# 4. Responses to Comments

In accordance with section 15088 of the State CEQA Guidelines, this chapter identifies and provides responses to comments received during the public comment period on the Recirculated Draft EIR (June 30, 2022 to August 29, 2022). It also describes the distribution of the Recirculated Draft EIR, presents the number of comment submissions received and the method by which they were received, and provides a list of persons, organizations, and agencies that provided comments on the Recirculated Draft EIR. **Section 4.3** of this chapter provides the text of each comment submission delineated into individual comments followed by Metro's written response to each individual comment. The original comment transcripts and submissions, including any graphics, charts, and attachments, are provided in their entirety in **Appendix A**. Consistent with section 15088.5(f)(1) of the CEQA Guidelines, the Recirculated Draft EIR replaced the 2014 Draft Environmental Impact Report/Environmental Impact Statement (Draft EIS/EIR). As a result, comments submitted on the 2014 Draft EIS/EIR have not been provided responses, although those comments remain part of the administrative record.

## 4.1 Distribution of the Recirculated Draft EIR

The Recirculated Draft EIR was submitted to the State Clearinghouse Office of Planning and Research on June 30, 2022 and circulated for public review for 60 days, until August 29, 2022. To inform agencies, stakeholders, and the community about the release of the Recirculated Draft EIR, a notice of availability was distributed to agencies, organizations, elected officials, and other interested parties. A newspaper notice was published in the Los Angeles Times, La Opinion (Spanish), Whittier Daily News, and Eastside Sun and a public mailer was distributed that included information on the release of the Recirculated Draft EIR, details on community information sessions and public hearings, and information on how to access and comment on the document. Additional efforts to inform the public on the availability of the Recirculated Draft EIR included social media postings, a second mailing, display of banners, distribution of flyers and lawn signs, distribution of a toolkit to stakeholders for spreading the information to the community, slides provided to cities for posting on their cable channel, and posting on Metro's website and news blog.

The Recirculated Draft EIR was made available online at the California State Clearinghouse website, the Metro project webpage and StoryMap, and printed copies were made available at Metro Headquarters and six libraries along the corridor.[4] Metro conducted four public hearings – three in-person and one virtual with in-person remote viewing access at a central site along the corridor – to provide information on the Recirculated Draft EIR evaluation and receive verbal and written public comments. The public hearings were held July 21, 2022 in East Los Angeles, July 30, 2022 in Montebello, August 11, 2022 in Pico Rivera/virtual, and August 17, 2022 in Whittier. Additional information on outreach is provided in **Appendix B**, Outreach Summary Report.

[4] East Los Angeles Library (4837 E 3rd Street, East Los Angeles); Commerce Public Library (5655 Jillson Street, Commerce); Chet Holifield County Library (1060 S Greenwood Avenue, Montebello); Pico Rivera Library (9001 Mines Avenue, Pico Rivera); Los Nietos County Library (8511 Duchess Drive, Whittier); and Whittier Public Library (7344 Washington Avenue, Whittier).

Metro accepted comment submissions on the Recirculated Draft EIR via the project website, email, U.S. mail, helpline (submitted via voicemail), and written and oral comments provided at public hearings or other public settings. During the 60-day public comment period, 301 comment submissions were received. One additional comment submission was received three months after the close of the comment period. The late submission is similar to a submittal by the same commenter that was received during the public comment period and to which responses are provided. The late submission is provided for informational purposes.

## 4.2 Comments on the Recirculated Draft EIR

Section 15204 of the CEQA Guidelines provides guidance to the public in reviewing CEQA documents. This section of CEQA is designed not to limit the scope of comments that can be submitted by the public, but to focus comments on issues that are substantive to the environmental analysis. Commenting entities should focus on the adequacy of the document in identifying and analyzing impacts to the environment and ways in which the significant effects of the project could be avoided or mitigated. Section 15204 states that comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or reduce specific significant environmental effects. Reviewers should explain the basis for their comments and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion support by facts in support of the comments.

As identified above, a total of 301 comment submissions were submitted during the public review period and one submission was provided after this period closed. An alphanumeric Identification (ID) Code is used to identify each comment submission provided to Metro on the Recirculated Draft EIR. The ID Code consists of a letter to denote the category of submittal followed by a sequential digit number within that category. The categories are labeled “A” for Agency, “CO” for Community Organization, “B” for Business, “I” for Individual, “O” for Other,” and “L” for the submission received after the close of the comment period. Within each category, comment submissions are numbered sequentially, generally in the order in which they were received. For instance, four submittals were received from businesses; they are labeled B-1 through B-4.

**Table 4-1** presents a list of those agencies, community organizations, businesses, individuals, and others who commented on the Recirculated Draft EIR, with the ID Code, and the page number where the comment(s) and response(s) can be found. The table also lists the method that was used to provide the comment submission to Metro.

## Table 4-1. Comment Submissions Received on the Recirculated Draft EIR

| ID Code | Date (of Receipt) | Submission Method | Agency/Organization/Individual | Page |
|---|---|---|---|---|
| **Agencies** | | | | |
| A-1 | July 26, 2022 | Website | LA County Library | 4-13 |
| A-2 | August 19, 2022 | Website | Los Angeles Unified School District | 4-13 |
| A-3 | August 23, 2022 | Email | California Department of Fish and Wildlife | 4-24 |
| A-4 | August 23, 2022 | Email | California Department of Transportation (Caltrans) | 4-45 |
| A-5 | August 29, 2022 | Email | County of Los Angeles Department of Parks and Recreation | 4-48 |
| A-6 | August 29, 2022 | Email | Los Angeles County Sanitation Districts | 4-53 |
| A-7 | August 29, 2022 | Website | City of Commerce | 4-59 |
| A-8 | August 29, 2022 | Email | City of Pico Rivera | 4-66 |
| A-9 | August 29, 2022 | Email | City of Commerce | 4-78 |
| A-10 | August 30, 2022 | Email | California Public Utilities Commission | 4-80 |
| A-11 | August 31, 2022 | Email | Caltrans District 7 | 4-86 |
| **Community Organizations** | | | | |
| CO-1 | July 21, 2022 | Oral | East Los Angeles Chamber of Commerce | 4-94 |
| CO-2 | July 21, 2022 | Oral | East Los Angeles Chamber of Commerce | 4-96 |
| CO-3 | August 29, 2022 | Website | Via Care Community Health Center | 4-98 |
| CO-4 | August 29, 2022 | Website | East Los Angeles Boyle Heights Coalition | 4-99 |
| CO-5 | August 26, 2022 | Email | East Los Angeles Chamber of Commerce | 4-109 |
| CO-6 | August 26, 2022 | Email | Whittier Boulevard Merchants Association | 4-110 |
| CO-7 | August 29, 2022 | Email | Maravilla Community Advisory Committee | 4-111 |
| CO-8 | August 29, 2022 | Email | East Los Angeles Boyle Heights Coalition | 4-113 |
| CO-9 | August 25, 2022 | Email | East Los Angeles Coalition | 4-116 |
| CO-10 | August 17, 2022 | PH#4 CC | Whittier Area Chamber of Commerce | 4-117 |
| CO-11 | August 29, 2022 | Email | Washington Blvd Light Rail Transit Coalition | 4-118 |
| **Businesses** | | | | |
| B-1 | July 1, 2022 | Website | A TORRES TUXEDOS | 4-119 |
| B-2 | August 19, 2022 | Website | GFC Atlantic Associates, LLC | 4-119 |
| B-3 | August 19, 2022 | Email | GFC Atlantic Associates, LLC | 4-123 |
| B-4 | August 17, 2022 | PH comment card | PIH Health | 4-125 |
| **Individuals** | | | | |
| I-1 | June 30, 2022 | Website | David Barboza | 4-126 |
| I-2 | July 1, 2022 | Website | Christine Mowles | 4-128 |
| I-3 | July 4, 2022 | Website | David Woolery | 4-128 |
| I-4 | July 8, 2022 | Website | Shirley Davis | 4-129 |
| I-5 | July 8, 2022 | Website | Jessica Huerta | 4-130 |
| I-6 | July 3, 2022 | Email | Manuel R | 4-130 |

| ID Code | Date (of Receipt) | Submission Method | Agency/Organization/Individual | Page |
|---|---|---|---|---|
| I-7 | July 13, 2022 | Website | Lawrence Reynolds | 4-131 |
| I-8 | July 15, 2022 | Website | Jose | 4-132 |
| I-9 | July 16, 2022 | Website | Mario Tovar | 4-132 |
| I-10 | July 16, 2022 | Website | Cristina Tovar | 4-134 |
| I-11 | July 18, 2022 | Website | Celia Medina | 4-135 |
| I-12 | July 19, 2022 | Website | Patricia Gomez | 4-136 |
| I-13 | July 20, 2022 | Website | Amy Margolis | 4-137 |
| I-14 | July 20, 2022 | Website | Ed Izaguirre | 4-137 |
| I-15 | July 20, 2022 | Website | Daniel Gomez | 4-137 |
| I-16 | July 20, 2022 | Website | Dominic Gonzalez | 4-138 |
| I-17 | July 21, 2022 | Website | Cristina Zuniga | 4-141 |
| I-18 | July 22, 2022 | Website | Amy Gong | 4-141 |
| I-19 | July 24, 2022 | Website | Iris Nunez | 4-141 |
| I-20 | July 25, 2022 | Website | Anonymous | 4-142 |
| I-21 | July 15, 2022 | Email | Richard Farber | 4-143 |
| I-22 | July 26, 2022 | Website | Joe Chaides | 4-143 |
| I-23 | July 26, 2022 | Website | Assal Farahani | 4-144 |
| I-24 | July 28, 2022 | Website | Drew Katonak | 4-144 |
| I-25 | August 1, 2022 | Website | Arturo Ramirez | 4-144 |
| I-26 | August 1, 2022 | Website | Andrew Morrish | 4-144 |
| I-27 | August 5, 2022 | Website | Emmanuel Sandoval | 4-145 |
| I-28 | August 8, 2022 | Website | Hue Doan | 4-146 |
| I-29 | August 8, 2022 | Website | Alice Serna | 4-146 |
| I-30 | July 30, 2022 | Event | Lorena Hernandez | 4-147 |
| I-31 | July 30, 2022 | Event | Ernie Macias | 4-147 |
| I-32 | August 8, 2022 | Website | Eugenia Falcon | 4-147 |
| I-33 | August 8, 2022 | Website | Ernest and Lisa Valentino | 4-148 |
| I-34 | August 8, 2022 | Website | John Carrillo | 4-149 |
| I-35 | August 8, 2022 | Website | Michel | 4-149 |
| I-36 | August 9, 2022 | Website | Diana Gomez | 4-150 |
| I-37 | August 9, 2022 | Website | Oswald Ruiz | 4-151 |
| I-38 | August 5, 2022 | Event | Beatriz Sanchez | 4-152 |
| I-39 | August 5, 2022 | Event | Rebecca Sanchez | 4-152 |
| I-40 | August 9, 2022 | Website | Alex Ortiz | 4-152 |
| I-41 | August 9, 2022 | Website | Marlene Duenas | 4-153 |
| I-42 | August 9, 2022 | Website | john | 4-154 |
| I-43 | August 10, 2022 | Website | Frank Ventura | 4-154 |
| I-44 | August 10, 2022 | Website | Aurelia Ayala | 4-155 |

| ID Code | Date (of Receipt) | Submission Method | Agency/Organization/Individual | Page |
|---|---|---|---|---|
| I-45 | August 10, 2022 | Website | Rita Rojas | 4-155 |
| I-46 | August 11, 2022 | Website | Jorge Martinez | 4-157 |
| I-47 | August 11, 2022 | Website | Denise Gonzalez | 4-157 |
| I-48 | August 11, 2022 | Website | Ms Martinez | 4-158 |
| I-49 | August 11, 2022 | Website | Stephanie Vallejo | 4-159 |
| I-50 | August 11, 2022 | Website | Gabriela Sanchez | 4-160 |
| I-51 | August 11, 2022 | Website | Miguel G | 4-162 |
| I-52 | August 11, 2022 | Website | David Gomez | 4-162 |
| I-53 | August 11, 2022 | Website | Anonymous | 4-163 |
| I-54 | August 11, 2022 | Website | Sergio Arambula | 4-164 |
| I-55 | August 11, 2022 | Website | Rose Morales | 4-165 |
| I-56 | August 12, 2022 | Website | Jorge Rodriguez | 4-167 |
| I-57 | August 12, 2022 | Website | Adam Garcia | 4-167 |
| I-58 | August 12, 2022 | Website | Daniel T | 4-168 |
| I-59 | August 12, 2022 | Website | Larry Whitmer | 4-168 |
| I-60 | August 12, 2022 | Website | Maria Lopez | 4-169 |
| I-61 | August 12, 2022 | Website | Tony Guzman | 4-170 |
| I-62 | August 12, 2022 | Website | Lucy Marquez | 4-170 |
| I-63 | August 12, 2022 | Website | John M | 4-171 |
| I-64 | August 12, 2022 | Website | Carrie Gomez | 4-171 |
| I-65 | August 13, 2022 | Website | Sophia Marquez | 4-172 |
| I-66 | August 13, 2022 | Website | Frank Gomez | 4-172 |
| I-67 | August 13, 2022 | Website | Y T | 4-172 |
| I-68 | August 13, 2022 | Website | Tony Gonzales | 4-173 |
| I-69 | August 13, 2022 | Website | Jennifer F | 4-174 |
| I-70 | August 13, 2022 | Website | Frank Gomez | 4-174 |
| I-71 | August 13, 2022 | Website | Diego Ramirez | 4-174 |
| I-72 | August 13, 2022 | Website | Jason Fang | 4-174 |
| I-73 | August 13, 2022 | Website | Amy Ramirez | 4-175 |
| I-74 | August 13, 2022 | Website | Sammy Larson | 4-175 |
| I-75 | August 13, 2022 | Website | Tom Carter | 4-176 |
| I-76 | August 13, 2022 | Website | Sam Clark | 4-176 |
| I-77 | August 13, 2022 | Website | Josefina S | 4-176 |
| I-78 | August 13, 2022 | Website | Anonymous | 4-177 |
| I-79 | August 13, 2022 | Website | Maria Lopez | 4-177 |
| I-80 | August 13, 2022 | Website | Larry Gomez | 4-177 |
| I-81 | August 13, 2022 | Website | M Thomas | 4-178 |
| I-82 | August 13, 2022 | Website | Gary Peters | 4-178 |

| ID Code | Date (of Receipt) | Submission Method | Agency/Organization/Individual | Page |
|---|---|---|---|---|
| I-83 | August 13, 2022 | Website | J Garcia | 4-179 |
| I-84 | August 13, 2022 | Website | Francisco T | 4-179 |
| I-85 | August 13, 2022 | Website | Laura S | 4-180 |
| I-86 | August 13, 2022 | Website | D Lopez | 4-180 |
| I-87 | August 14, 2022 | Website | Ivan Y | 4-181 |
| I-88 | August 14, 2022 | Website | Josh P | 4-181 |
| I-89 | August 14, 2022 | Website | J D | 4-181 |
| I-90 | August 14, 2022 | Website | Ur Mom | 4-182 |
| I-91 | August 14, 2022 | Website | Samantha Gomez | 4-182 |
| I-92 | August 14, 2022 | Website | Jay H | 4-182 |
| I-93 | August 14, 2022 | Website | T Clark | 4-182 |
| I-94 | August 14, 2022 | Website | JD Lopez | 4-183 |
| I-95 | August 14, 2022 | Website | Jess Ramirez | 4-183 |
| I-96 | August 14, 2022 | Website | JP Sanchez | 4-183 |
| I-97 | August 14, 2022 | Website | Tom C | 4-184 |
| I-98 | August 15, 2022 | Website | Pete K | 4-184 |
| I-99 | August 15, 2022 | Website | Anonymous | 4-184 |
| I-100 | August 15, 2022 | Website | Nancy W | 4-185 |
| I-101 | August 15, 2022 | Website | Maria L | 4-185 |
| I-102 | August 15, 2022 | Website | Common Sense | 4-185 |
| I-103 | August 15, 2022 | Website | Juan | 4-186 |
| I-104 | August 15, 2022 | Website | Ernest Valentino | 4-186 |
| I-105 | August 15, 2022 | Website | A T | 4-187 |
| I-106 | August 15, 2022 | Website | Rob Garcia | 4-187 |
| I-107 | August 15, 2022 | Website | Jamie Hwang | 4-187 |
| I-108 | August 15, 2022 | Website | JD Lopez | 4-188 |
| I-109 | August 16, 2022 | Website | Donna Cruz | 4-188 |
| I-110 | August 16, 2022 | Website | Gerardo Madrigal | 4-188 |
| I-111 | August 16, 2022 | Website | Michelle Rodriguez | 4-189 |
| I-112 | August 16, 2022 | Website | Metro IsCorrupt | 4-189 |
| I-113 | August 16, 2022 | Website | P Johnson | 4-189 |
| I-114 | August 12, 2022 | Event | Donald R. | 4-190 |
| I-115 | August 12, 2022 | Event | Aurera Camarena | 4-190 |
| I-116 | August 12, 2022 | Event | N/A | 4-190 |
| I-117 | August 17, 2022 | Website | Gabby M | 4-191 |
| I-118 | August 17, 2022 | Website | J L | 4-192 |
| I-119 | August 17, 2022 | Website | Daniel T | 4-192 |
| I-120 | August 17, 2022 | Website | Jason Miller | 4-192 |

| ID Code | Date (of Receipt) | Submission Method | Agency/Organization/Individual | Page |
|---|---|---|---|---|
| I-121 | August 17, 2022 | Website | Anonymous | 4-193 |
| I-122 | August 18, 2022 | Website | Anonymous | 4-193 |
| I-123 | August 18, 2022 | Website | Joe | 4-194 |
| I-124 | August 18, 2022 | Website | J Rodriguez | 4-194 |
| I-125 | July 30, 2022 | Oral | Eugenia Reyes | 4-194 |
| I-126 | July 30, 2022 | Oral | Jesse Garcia | 4-195 |
| I-127 | July 30, 2022 | Oral | Edmund Veloz | 4-196 |
| I-128 | July 30, 2022 | Oral | Esther Celiz | 4-196 |
| I-129 | July 30, 2022 | Oral | Jorge Martinez | 4-198 |
| I-130 | July 30, 2022 | Oral | Marina Martinez | 4-199 |
| I-131 | July 30, 2022 | Website | Mike Martinez | 4-200 |
| I-132 | July 30, 2022 | Oral | Sandra Sandoval | 4-201 |
| I-133 | August 18, 2022 | Website | Rob Lopez | 4-202 |
| I-134 | August 18, 2022 | Website | Gloria Zelaya | 4-202 |
| I-135 | August 18, 2022 | Website | Metro is Corrupt | 4-203 |
| I-136 | August 18, 2022 | Website | Anonymous | 4-203 |
| I-137 | August 18, 2022 | Website | Anonymous | 4-204 |
| I-138 | August 19, 2022 | Website | C J | 4-204 |
| I-139 | August 19, 2022 | Website | Jason S | 4-205 |
| I-140 | August 19, 2022 | Website | Jamie | 4-206 |
| I-141 | August 19, 2022 | Website | Anonymous | 4-206 |
| I-142 | July 30, 2022 | Oral | Enerina Clift | 4-207 |
| I-143 | July 30, 2022 | Oral | Anonymous | 4-208 |
| I-144 | July 30, 2022 | Oral | Lourdes Ruiz | 4-209 |
| I-145 | July 30, 2022 | Oral | Ava Tejada | 4-209 |
| I-146 | August 19, 2022 | Website | R T | 4-209 |
| I-147 | August 19, 2022 | Website | Mike Missel | 4-210 |
| I-148 | August 19, 2022 | Website | RJ Smith | 4-210 |
| I-149 | August 20, 2022 | Website | Alex Barnhart | 4-211 |
| I-150 | August 20, 2022 | Website | A Martinez | 4-211 |
| I-151 | August 20, 2022 | Website | Anonymous | 4-212 |
| I-152 | August 21, 2022 | Website | Gabriel Lopez | 4-212 |
| I-153 | August 21, 2022 | Website | Jay Miller | 4-213 |
| I-154 | August 21, 2022 | Website | Sam Lee | 4-213 |
| I-155 | August 21, 2022 | Website | Tony Garcia | 4-214 |
| I-156 | August 21, 2022 | Website | Ray Garcia | 4-215 |
| I-157 | August 21, 2022 | Website | CJ Ramirez | 4-215 |
| I-158 | August 22, 2022 | Website | Ray Garcia | 4-215 |

| ID Code | Date (of Receipt) | Submission Method | Agency/Organization/Individual | Page |
|---|---|---|---|---|
| I-159 | August 17, 2022 | PH comment card | Irene Carrillo | 4-216 |
| I-160 | August 17, 2022 | PH comment card | N/A | 4-216 |
| I-161 | August 23, 2022 | Website | Clara Solis | 4-217 |
| I-162 | August 24, 2022 | Website | Diana Gomez | 4-234 |
| I-163 | August 22, 2022 | Email | Kevin Chu | 4-236 |
| I-164 | August 24, 2022 | Website | Patty | 4-236 |
| I-165 | July 21, 2022 | Oral | Jorge Martinez | 4-236 |
| I-166 | July 21, 2022 | Oral | Edmund Veloz | 4-237 |
| I-167 | July 21, 2022 | Oral | Francisco Martinez | 4-237 |
| I-168 | July 21, 2022 | Oral | Blanca Chavez | 4-238 |
| I-169 | July 21, 2022 | Oral | Denise Hagopian | 4-238 |
| I-170 | August 25, 2022 | Website | Esther Celiz | 4-240 |
| I-171 | August 25, 2022 | Website | Catalina Castro | 4-241 |
| I-172 | August 25, 2022 | Website | Maria Garcia | 4-242 |
| I-173 | August 25, 2022 | Website | David Reynoso | 4-242 |
| I-174 | August 25, 2022 | Website | Michael Hlebovy | 4-244 |
| I-175 | August 25, 2022 | Website | Campbell Sadeghy | 4-244 |
| I-176 | August 26, 2022 | Website | Alfredo Acosta | 4-245 |
| I-177 | August 26, 2022 | Website | Jasmine Torres | 4-245 |
| I-178 | August 26, 2022 | Website | James Prado | 4-246 |
| I-179 | August 27, 2022 | Website | Matt Diaz | 4-247 |
| I-180 | August 27, 2022 | Website | Grady Yu | 4-248 |
| I-181 | August 27, 2022 | Website | Anonymous | 4-248 |
| I-182 | August 28, 2022 | Website | Brayden Yoder | 4-249 |
| I-183 | August 28, 2022 | Website | Jamie Shepherd | 4-249 |
| I-184 | August 28, 2022 | Website | Paul Hennessy | 4-249 |
| I-185 | August 28, 2022 | Website | Leticia Gordo | 4-250 |
| I-186 | August 28, 2022 | Website | William Moreno | 4-255 |
| I-187 | August 28, 2022 | Website | Larry Batista | 4-255 |
| I-188 | August 28, 2022 | Website | Maria Rivera | 4-256 |
| I-189 | August 29, 2022 | Website | Frank Sanford | 4-257 |
| I-190 | August 29, 2022 | Website | Christopher Lord | 4-260 |
| I-191 | August 29, 2022 | Website | Bruce Rochford | 4-261 |
| I-192 | August 29, 2022 | Website | Eric Gordillo | 4-261 |
| I-193 | August 29, 2022 | Website | Mike Martinez | 4-263 |
| I-194 | August 29, 2022 | Website | Esperanza Fuentes | 4-268 |
| I-195 | August 29, 2022 | Website | Lisa Valentino | 4-268 |
| I-196 | August 29, 2022 | Website | Xavier Arambula | 4-269 |

| ID Code | Date (of Receipt) | Submission Method | Agency/Organization/Individual | Page |
|---|---|---|---|---|
| I-197 | August 29, 2022 | Website | Joyce Dillard | 4-271 |
| I-198 | August 29, 2022 | Website | karyn chen | 4-272 |
| I-199 | August 29, 2022 | Website | Clara and Clara S. Solis | 4-272 |
| I-200 | August 29, 2022 | Website | Samuel Chen | 4-297 |
| I-201 | August 29, 2022 | Website | Esther mejia | 4-298 |
| I-202 | August 29, 2022 | Website | Roman Vazquez | 4-299 |
| I-203 | August 29, 2022 | Website | Clara Solis | 4-301 |
| I-204 | August 29, 2022 | Website | Jay Salazar | 4-301 |
| I-205 | August 29, 2022 | Website | Nicholas Gutierrez | 4-302 |
| I-206 | August 29, 2022 | Website | Madison Gutierrez | 4-305 |
| I-207 | August 29, 2022 | Website | Raul Cuevas | 4-307 |
| I-208 | August 29, 2022 | Website | Hector Gutierrez | 4-308 |
| I-209 | August 29, 2022 | Website | Anonymous | 4-309 |
| I-210 | August 29, 2022 | Website | Iquibalan Avila | 4-309 |
| I-211 | August 29, 2022 | Website | Carmen Cuevas | 4-310 |
| I-212 | August 29, 2022 | Website | Denise Gutierrez | 4-310 |
| I-213 | August 26, 2022 | Email | Ron Mukai | 4-314 |
| I-214 | August 27, 2022 | Email | Sandra Parra | 4-315 |
| I-215 | August 11, 2022 | Oral | Arturo Hay | 4-315 |
| I-216 | August 11, 2022 | Oral | Bricia Satello | 4-316 |
| I-217 | August 11, 2022 | Oral | D K | 4-316 |
| I-218 | August 11, 2022 | Oral | Edmund Veloz | 4-318 |
| I-219 | August 11, 2022 | Oral | Esther Celiz | 4-318 |
| I-220 | August 11, 2022 | Oral | Jesse Garcia | 4-320 |
| I-221 | August 11, 2022 | Oral | Jiu Yoon | 4-321 |
| I-222 | August 11, 2022 | Oral | Jorge Martinez | 4-322 |
| I-223 | August 11, 2022 | Oral | Jorge Martinez | 4-323 |
| I-224 | August 11, 2022 | Oral | Linda Palacios | 4-324 |
| I-225 | August 11, 2022 | Oral | Marina Martinez | 4-324 |
| I-226 | August 11, 2022 | Oral | Maude Manji | 4-325 |
| I-227 | August 11, 2022 | Oral | Mike Martinez | 4-326 |
| I-228 | August 11, 2022 | Oral | S D | 4-327 |
| I-229 | August 11, 2022 | Oral | Sergio Arangula | 4-328 |
| I-230 | August 10, 2022 | Mail | Eva Cuellar | 4-329 |
| I-231 | August 10, 2022 | Mail | Cassie Cuellar | 4-329 |
| I-232 | August 10, 2022 | Mail | Nicole Cuellar | 4-329 |
| I-233 | August 11, 2022 | PH comment card | Esther Celiz | 4-329 |
| I-234 | August 29, 2022 | Mail | Edmund Veloz | 4-330 |

| ID Code | Date (of Receipt) | Submission Method | Agency/Organization/Individual | Page |
|---|---|---|---|---|
| I-235 | August 17, 2022 | PH comment card | Irene Carillo | 4-337 |
| I-236 | August 17, 2022 | PH comment card | Anonymous | 4-338 |
| I-237 | July 19, 2022 | Helpline | Yolanda | 4-339 |
| I-238 | June 30, 2022 | Helpline | Anonymous | 4-339 |
| I-239 | July 20, 2022 | Helpline | Maria Gonzalez | 4-340 |
| I-240 | August 9, 2022 | Helpline | Martha Fausto | 4-340 |
| I-241 | August 8, 2022 | Helpline | Cheryl Parker | 4-341 |
| I-242 | August 17, 2022 | PH comment card | Mohammed Abass | 4-342 |
| I-243 | August 17, 2022 | PH comment card | Maggie Mo | 4-342 |
| I-244 | August 17, 2022 | PH comment card | Edgar Edmond Veloz | 4-344 |
| I-245 | August 17, 2022 | PH comment card | Jorge Martinez | 4-344 |
| I-246 | August 17, 2022 | PH comment card | Mike Martinez | 4-345 |
| I-247 | August 17, 2022 | PH comment card | Diana Gomez | 4-346 |
| I-248 | August 17, 2022 | PH comment card | Eugenia Reyes | 4-347 |
| I-249 | August 17, 2022 | PH comment card | Jessie Garcia | 4-347 |
| I-250 | August 17, 2022 | PH comment card | Maria Reyes | 4-348 |
| I-251 | August 17, 2022 | PH comment card | Jesus Reyes | 4-349 |
| I-252 | August 17, 2022 | PH comment card | Reuben Valdez | 4-349 |
| I-253 | June 30, 2022 | Helpline | Howard Reuben | 4-350 |
| I-254 | August 17, 2022 | PH comment card | Anonymous | 4-350 |
| I-255 | August 17, 2022 | PH comment card | Tom Roblino | 4-351 |
| I-256 | August 17, 2022 | PH comment card | Maria Reyes | 4-352 |
| I-257 | August 17, 2022 | PH comment card | Eugenia Reyes | 4-353 |
| I-258 | August 17, 2022 | PH comment card | Edmond Veloz | 4-354 |
| I-259 | August 17, 2022 | PH comment card | Miguel Perla | 4-355 |
| I-260 | August 17, 2022 | PH comment card | Esther Celiz | 4-356 |
| I-261 | August 17, 2022 | PH comment card | Danny Hom | 4-356 |
| I-262 | July 21, 2022 | PH comment card | Mike Martinez | 4-357 |
| I-263 | August 22, 2022 | Mail | Martinez | 4-357 |
| I-264 | July 30, 2022 | PH comment card | Eugenia G. Reyes | 4-359 |
| I-265 | July 30, 2022 | PH comment card | Jose Moises Martinez | 4-359 |
| I-266 | July 30, 2022 | PH comment card | Mike Martinez | 4-360 |
| I-267 | July 30, 2022 | PH comment card | Anonymous | 4-360 |
| I-268 | July 30, 2022 | PH comment card | Roberta Torres | 4-360 |
| **Other** | | | | |
| O-1 | August 12, 2022 | Website | Residents against waste | 4-362 |
| O-2 | August 18, 2022 | Website | Metro Corruption Must Be Exposed | 4-363 |
| O-3 | August 20, 2022 | Website | Metro Corruption Needs Exposure | 4-364 |

| ID Code | Date (of Receipt) | Submission Method | Agency/Organization/Individual | Page |
|---|---|---|---|---|
| O-4 | August 21, 2022 | Website | Independent Third Party Audit Needed | 4-365 |
| O-5 | August 21, 2022 | Website | LA County residents against the misuse of public funds | 4-366 |
| O-6 | August 27, 2022 | Website | Whistleblowers Against Metro Corruption | 4-366 |
| O-7 | August 28, 2022 | Website | Third Party Review Needed | 4-368 |
| **Comments Received After the Close of the Public Comment Period** | | | | |
| L-1 | November 30, 2922 | Mail | Edmund Veloz | 4-368 |

# 4.3 Responses to Comments on the Recirculated Draft EIR

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." Consistent with Section 15088, written responses have been prepared associated with the environmental issues raised in the comments. In addition, where appropriate, the basis for incorporating or not incorporating specific suggestions into the Project is provided. In each case, Metro has expended a good faith effort, supported by reasoned analysis, to respond to comments.

As required by the State CEQA Guidelines, the focus of the responses to comments is on the "disposition of significant environmental issues raised" and detailed responses are not provided on the merits of the Project or on other topics that do not relate to environmental issues, even though they may well address legitimate concerns of public policy (e.g., economic, fiscal, or social issues). Some comments merely expressed approval or disapproval of one or more of the Build Alternatives. Some comments criticized the Project from a policy standpoint, or characterized it in negative terms, but did not assert that the Recirculated Draft EIR is in any way deficient. All such comments are part of the administrative record for the Project, have been considered by Metro staff, and will be forwarded, as part of this Final EIR, to the decision-makers (the voting members of the Metro Board of Directors) for their careful consideration, as, in weighing the various benefits and detriments associated with the Locally Preferred Alternative and the other alternatives, including the No Build Alternative, the decision-makers must balance economic, social, fiscal, and other concerns against the environmental impacts of the various options.

The level of detail in the response generally corresponds to the level of detail in the comment. For example, pursuant to Section 15088(c), a general response is provided when a comment does not contain or specifically refer to readily available information or explain the relevance of evidence submitted with the comment.

Section 15204 of the CEQA Guidelines reiterate that the Lead Agency is bound by "reasonableness" in its analysis and that the Lead Agency is not required to respond to comments in the Final EIR that do not identify significant environmental issues; nor does it need to provide all information requested by reviewers as long as a good faith effort at full disclosure is made.

## 4.3.1 Comment and Response Format

As described in **Section 4.2** and shown in **Table 4-1**, each comment submission is assigned an alphanumeric ID code. Metro further breaks down, or delineates, each comment submission into individual comments which are then numbered sequentially. For example, within comment submission I-1, six individual comments have been delineated which are identified as Comment I-1-1 through Comment I-1-6. This process allows Metro to more clearly address each topic raised in a comment submission.

**Section 4.3.2** below provides the text of the individual comment ordered sequentially by the alphanumeric ID code, followed by Metro's response to that comment. The original comment submissions have been bracketed to show the individual comment delineation and are provided in **Appendix A**. **Appendix A** also include any tables, graphics, and/or attachments that were provided as part of the comment submissions. All comments and responses to comments are provided in this Final EIR and will be considered by the Metro Board prior to certification of this Final EIR and in any approval of the Project.

## 4.3.2 Comments and Responses

This section includes responses to the comment submissions received during the 60-day public review period of the Recirculated Draft EIR, as well as a comment submission received three months following the close of the public comment period. Some comments have prompted revisions to the text of the Recirculated Draft EIR. The revisions are identified in the responses to comments herein and listed in Chapter 2, Corrections and Additions to the Recirculated Draft EIR, of this Final EIR.

As described in Section 1.5.2, pursuant to the Metro Board decision on December 1, 2022, the Final EIR advances the evaluation of the following alternatives:

- Alternative 1 with the Atlantic/Pomona Station Option, the Montebello At-Grade Option and the Montebello MSF
- Alternative 3 with the Atlantic/Pomona Station Option, the Montebello At-Grade Option, and the Montebello MSF (the LPA)

Thus, Metro is not moving forward with Alternative 2 or the Commerce MSF. However, while the Metro Board is not advancing Alternative 2 to the Final EIR, Chapter 3, Responses to Comments, address comments on all alternatives, design options, and MSF site options evaluated in Recirculated Draft EIR.

# 4.3.2.1 Agencies

## A-1: LA County Library

### Comment A-1-1

This is to provide comments regarding the Recirculated Draft Environmental Impact Report Metro Gold Line Eastside Transit Corridor Phase 2 which proposes to extend the Light Rail Transit Metro L (Gold) LIne from the current terminus CO-10-1 at the Atlantic Station into eastern Los Angeles County. LA County Library operates the Chet Holifield Library, which is 0.2 miles from the proposed aerial Greenwood station. Library has reviewed the findings and agrees that there is a less than significant impact to library services. If you have any questions or need additional information, please contact Elsa Munoz at (562) 940-8450 or EMunoz@library.lacounty.gov.

### Response to A-1-1

The Los Angeles County Library's Public Services and Recreation comment, which agrees that the Project would have a less than significant impact to library services and provides the name and phone number of the contact person at the department should questions arise, is noted.

## A-2: Los Angeles Unified School District

### Comment A-2-1

Presented below are comments submitted on behalf of the Los Angeles Unified School District's (Los Angeles Unified) Office of Environmental Health and Safety (OEHS) regarding the Recirculated Draft Environmental Impact Report (Draft EIR) for the proposed Metro Gold Line Eastside Transit Corridor Phase 2 Project (Project). LAUSD understands that the Project includes approximately 3.2 to 9 miles of extension, depending on the Build Alternative, of the Metro L (Gold) Line, a Light Rail Transit (LRT) line, from its current terminus at Atlantic Station in the unincorporated area of East Los Angeles to eastern Los Angeles County. The LRT guideway would begin at the eastern end of the existing East Los Angeles Civic Center Station, transitioning from at-grade to underground at the intersection of South La Verne Avenue and East 3rd Street. The guideway would then turn south and run beneath Atlantic Boulevard to approximately Verona Street and Olympic Boulevard. The existing Atlantic Station would be relocated and reconfigured to an underground center platform station located beneath Atlantic Boulevard south of Beverly Boulevard in East Los Angeles.

Due to the proximity of the project to Los Angeles Unified schools, we have the following concerns about potential negative impacts on the operation of schools as well as the school communities, including students, teachers, staff, and parents.

### Response to A-2-1

See Responses Comments A-2-2 through A-2-24 below.

### Comment A-2-2

Potential Impacts to 4th Street Elementary School, 4th Street Primary Center, Garfield High School, Griffith Middle School STEAM Magnet, and Monterey Continuation High School

4th Street Elementary School, 4th Street Primary Center, and Griffith Middle School STEAM Magnet are immediately adjacent to the Project Corridor. Garfield High School and Monterey Continuation High School are located approximately 330 feet east of the Project Corridor.

### Response to A-2-2

The Recirculated Draft EIR identifies and addresses impacts to schools located within the DSA throughout the analysis. The Recirculated Draft EIR, however, inadvertently did not include the 4th Street Primary Center in the list of schools; therefore, the Recirculated EIR has been modified in the Final EIR to add 4th Street Primary Center to the list of schools on pages 3.8-25, 3.8-45, 3.8-46, 3.8-47, 3.8-48, 3.8-49, 3.13-7, 3.13-10, 3.13-14, 3.13-16, 3.13-17, and 3.13-18. The 4th Street Primary Center is located along the underground portion of the alignment adjacent to 4th Street Elementary School and as identified the revised text, the impacts would be the same as identified for the 4th Street Elementary School and there would be no new significant impacts.

The same edits have been incorporated into Appendix I, Hazards and Hazardous Materials on pages 49, 90, 91, 93, 94, 96, 97 and 98, and Appendix M, Community and Neighborhood Impacts Report on pages 42, 56, 60, 63, 66, 69, and 72.

### Comment A-2-3

Noise and Vibration

LAUSD requests that the Final EIR studies Noise and Vibration impacts during Construction and Operation to 4th Street Primary Center located immediately adjacent to the Project Corridor. Located at 469 Amalia Avenue, 4th Street Primary Center is bounded by Atlantic Boulevard on the western border of the Campus.

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

### Response to A-2-3

Section 2.5 of the Recirculated Draft EIR describes the aerial, at-grade, and underground configurations of the Build Alternatives along their alignments. As outlined in that section, the configuration of the alignment adjacent to 4th Street Primary Center at 469 Amalia Avenue would be underground and construction would occur using a tunnel boring machine. As presented in Section 3.11.6 of the Recirculated Draft EIR, the nearest representative receptor to the site in question is M03 at 743 Amalia Avenue. As discussed in this section, in the vicinity of this receptor, the Project would not have a significant impact from operations (Table 3.11-9) but would have a significant impact from construction (Table 3.11-13). As further discussed in Section 3.11.6.1.1, compliance with project measures PM NOI-1 and PM NOI-2 and implementation of mitigation measures MM NOI-1 through MM NOI-11 would reduce construction noise impacts experienced by sensitive receptors to a less than significant level through means such as noise buffers (if required) and establishing a Construction Hotline to resolve noise issues. Specifically, MM NOI-9

and MM NOI-11 would reduce noise associated with underground boring construction activities. Project measures and mitigation measures are listed in Section 3.11.7.1 of the Recirculated Draft EIR, beginning on page 3.11-47 and summarized in greater detail on page 3.11-24 in Section 3.11.6.1.1. Chapter 3 of the Final EIR identifies revisions to the mitigation measures and project measures. See further discussion on noise mitigation below.

As described in the CEQA Guidelines Section 15064.7(b), lead agencies have the discretion to establish the appropriate threshold of significance for determining the significance of environmental effects; these thresholds may also be used on a case by case basis as provided in Section 15064(b)(2). The thresholds of significance used to evaluate environmental effects in the Recirculated Draft EIR are defined in Section 3.11.4, and are based on the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA 2018). Based on the application of the methodology for assessing noise impacts in the manual and as assessed in Section 3.11.6, the Project would have a less than significant operational impact on institutional receptors (including schools), and a less than significant construction impact on institutional receptors (including schools) after mitigation. As identified in project measure PM NOI-2, Metro, as a state-chartered transportation agency, is exempt from local noise ordinances. However, the agency is committed to complying with local construction noise limits whenever feasible and reasonable in accordance with its own construction specifications. Metro's contractor would utilize control measures from Metro's Metro Rail Design Criteria (MRDC) baseline specifications Section 01 56 19, Construction Noise and Vibration Control, to minimize noise and vibration impacts in the community and to minimize, to the greatest extent practicable, disturbance to the public in areas adjacent to the construction activities and to occupants of nearby buildings. As discussed in Section 3.11.3.10 of the Recirculated Draft EIR, it takes a doubling of traffic volumes for noise levels to change by 3 dBA. Even assuming a higher noise factor for haul trucks compared to passenger vehicles, the addition of construction truck trips would not be so substantial as to result in an acoustically perceptible change in ambient noise levels.

In addition to MM NOI-9 and MM NOI-11 discussed above, Section 3.11.7.2 identifies other construction noise mitigation measures that would be implemented to reduce construction noise. MM NOI-1 requires the contractor to develop a construction noise control plan to minimize noise impacts. This would include identification of construction noise performance criteria consistent with FTA general assessment criteria. The construction noise performance criteria would prohibit construction noise from exceeding the FTA general assessment construction noise criteria of 80 dBA for nighttime work and 90 dBA for daytime work at residential properties, or 100 dBA at commercial or industrial properties for daytime or nighttime, work. These criteria shall be measured at the boundary of any occupied property where the noise is being received. However, Metro may consider construction requirements and area context to identify construction noise performance criteria that is more strict than the FTA general assessment construction noise criteria. Additionally, while no piles are expected to be needed in the vicinity of LAUSD schools, MM NOI-2 requires pile-driving to be avoided where necessary to comply with performance criteria at locations containing noise- and vibration-sensitive receptors, such as schools. To clarify the intent of MM NOI-3, the mitigation measure has been revised in the Final EIR as follows:

> Metro shall require the Contractor to erect temporary noise barriers between noisy activities and noise sensitive receptors as necessary to ensure compliance with applicable *construction* noise *performance criteria as specified in the construction noise monitoring plan developed under MM NOI-1* ~~limits~~. *During construction, Metro shall perform audits to monitor the effectiveness of the noise barriers*.

As discussed in the Recirculated Draft EIR and described above, construction noise impacts are mitigated to less than significant and therefore, additional mitigation is not required.

It should also be noted that the California High Performance Schools (CHPS) and LAUSD noise standards referenced in the comment pertain to the design and construction of school buildings and not to the design and construction of facilities off campus, such as the Project. The FTA methodology and impact criteria utilized in the Recirculated Draft EIR are specifically tailored for transit projects, and address the unique challenges and impacts associated with construction and operation of transit systems.

### Comment A-2-4

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

- A temporary noise barrier capable of reducing construction noise levels on the 4th Street Primary Center and Griffith Middle School STEAM Magnet campuses to 67 dBA Leq shall be installed between the rail corridor and the schools.

### Response to A-2-4

As described in Response to Comment A-2-3, project measure PM NOI-2 identifies that Metro, as a state-chartered transportation agency, is exempt from local noise ordinances. However, the agency is committed to consistency with local construction noise limits whenever feasible and reasonable in accordance with its own construction specifications.

As presented in Section 3.11.7 in Section 3.11, Noise and Vibration, of the Recirculated Draft EIR, and revised in the Final EIR, mitigation measure MM NOI-1 requires the contractor to develop a construction noise control plan and a construction noise monitoring plan to minimize noise impacts. This would include construction noise performance criteria that would prohibit construction noise from exceeding the FTA general assessment construction noise criteria of 80 dBA for nighttime work and 90 dBA for daytime work at residential properties, or 100 dBA at commercial or industrial properties for daytime or nighttime, work. These criteria shall be measured at the boundary of any occupied property where the noise is being received. Depending on construction requirements and work context, Metro may identify construction noise assessment criteria that is more strict than the FTA general assessment construction noise criteria. The specific noise barrier requirements would be assessed by the Contractor as part of the construction noise control plan and construction noise monitoring plan for the Project, as required by mitigation measure MM NOI-1 and implemented as necessary as required by MM NOI-3 (see Section 3.11.7 of the Recirculated Draft EIR).

MM NOI-3, which has been revised as identified in Response to Comment A-2-3, requires the Contractor to erect temporary noise barriers as necessary between noisy activities and noise sensitive receptors as necessary to ensure compliance with applicable construction noise performance criteria as specified in the construction noise monitoring plan developed under MM NOI-1 and requires Metro to perform audits to monitor the effectiveness of the noise barriers. This applies to all sensitive receptors including the schools identified in the comment.

Therefore, construction noise impacts are mitigated to less than significant and additional mitigation is not required to ensure that construction noise at 4th Street Primary Center and Griffith Middle School would remain below the required noise limit.

### Comment A-2-5

- Provisions shall be made to allow school administrators and/or their designated representative(s) to notify the contractor if construction noise levels are adversely impacting the learning environment. In this event, the contractor must implement additional noise attenuation measures or reschedule noise-generating activities to a time when school is not in session.

### Response to A-2-5

Metro includes communication with local school districts as part of its standard outreach procedures. This outreach would continue during Project construction and would include communication between Metro's Construction Relations Officers and LAUSD representatives on construction schedules and activities and the construction noise mitigation plan. Metro would work with the construction contractor to address any concerns voiced by LAUSD as part of this standard outreach process. Further, communication between Metro, LAUSD, and Metro Contractors would be consistent with mitigation measure MM NOI-8 identified in Section 3.11.7 of the Recirculated Draft EIR as modified in the Final EIR. This mitigation measure requires Metro to notify the public of construction operations and schedule and establishes a Construction Hotline, which would provide an additional way for LAUSD representatives and LAUSD families to contact Metro during construction. To provide further clarity on this issue, MM NOI-8 has been revised in the Final EIR as follows:

> Metro shall notify the public*, including schools,* of construction operations and schedules.

Therefore, LAUSD would have communication avenues with Metro through standard outreach procedures and MM NOI-8. Adding additional mitigation to provide for direct contact between LAUSD and the contractor is not necessary. Further, as discussed under Response to Comment A-2-3 above, implementation of mitigation measure MM NOI-3, would ensure that construction activities would comply with applicable noise limits as identified in the construction noise control plan. Construction noise impacts are mitigated to less than significant and additional mitigation is not required.

### Comment A-2-6

Pedestrian Safety, and Traffic OEHS approves of the below grade light rail transit, as this eliminates potential conflict points between the trains and pedestrians or vehicles. However, OEHS is concerned with the close proximity of the proposed staging area located west of Atlantic Boulevard between Corona Street and East 4th Street. Construction activities will also lead to the presence of heavy equipment and increased truck trips to haul materials on and off the project site, which can lead to safety hazards for people walking or driving in the vicinity of the construction site.

### Response to A-2-6

As discussed in Section 3.14.7.1 of the Recirculated Draft EIR, the Project would include construction best management practices (BMPs) to address safety as identified in project measure PM TRA-2. Methods may include signage, partial lane closures, and construction barriers. Pedestrian access to adjacent properties would be maintained during construction and the Project would adhere to applicable design and safety criteria and standards, including the MRDC and the California Manual of Uniform Traffic Control Devices.

Additionally, mitigation measure MM TRA-1 identified in Section 3.14.7.2 of the Recirculated Draft EIR and as modified in the Final EIR, requires the contractor to implement a Traffic Management Plan as needed to facilitate the flow of traffic in and around construction zones. The Traffic Management Plan would, at a minimum, include elements such as providing wayfinding signage, lighting and access to pedestrian safety amenities, providing pedestrian detour routes and temporary pedestrian shelters as needed, and providing traffic control officers at major intersections at peak hours as feasible if delays are related to construction activities.

Implementation of safety measures specified in PM TRA-2 and MM TRA-1 would ensure that construction staging and construction activities would not pose a significant risk to the public. With implementation of PM TRA-2 and MM TRA-1, the impact is less than significant and no further mitigation is required.

### Comment A-2-7

In addition, construction activities also may lead to increased traffic volumes or traffic disruptions in an already congested area during school drop off and pickup times.

### Response to A-2-7

Project measure PM TRA-2 and mitigation measure MM TRA-1 would require the implementation of traffic controls during construction which would ensure impacts are less than significant. For additional information, see Section 3.14.7.1 of the Recirculated Draft EIR and Response to Comment A-2-6.

### Comment A-2-8

To ensure that impacts on nearby schools from the construction of the proposed Project are reduced to the extent feasible, OEHS asks that the following mitigation measures be required:

- Contractors must maintain ongoing communication with Los Angeles Unified school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to schools may be impacted.

### Response to A-2-8

As described in Section 3.14.7 of the Recirculated Draft EIR, a Traffic Management Plan would be implemented to help reduce the impacts on traffic movement in the construction work zones and would ensure that adequate and safe access would remain available to schools and other facilities within and near the Project construction zone as required by mitigation measure MM TRA-1. Additionally, the Recirculated Draft EIR has been revised to add the following bullet to MM TRA-1 on page 3.14-48 and page 3.14-49:

- *Regular communication with school administrators shall be maintained to ensure sufficient notice of construction activities and/or detours, that could affect pedestrian routes to schools is provided.*

The same edit has been made to MM TRA-1 on page 141 and 142 of Appendix N, Transportation and Traffic Impacts Report.

### Comment A-2-9

- Contractors must maintain safe and convenient pedestrian routes to Los Angeles Unified schools. Los Angeles Unified's School Pedestrian Route Maps are available at: http://www.lausdoehs.org/saferoutestoschools.asp.

### Response to A-2-9

Section 3.14.6.1 of the Recirculated Draft EIR evaluates potential impacts to pedestrian circulation during construction. As discussed in that section, implementation of MM TRA-1 would require a Traffic Management Plan that specifies measures to minimize disruption of pedestrian circulation during construction, such as providing pedestrian detour routes, temporary pedestrian shelters, and wayfinding. Additionally, Metro's standard outreach activities include regular communication with LAUSD and, as identified in Response to Comment A-2-8 above. As noted in Response to Comment A-2-8, MM TRA-1 has been revised to require regular communication with school administrators to be maintained to ensure sufficient notice of construction activities and/or detours that may affect pedestrian routes to schools. With implementation of mitigation measure MM TRA-1, impacts are less than significant and no further mitigation is required.

### Comment A-2-10

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety

### Response to A-2-10

Regarding construction traffic controls, see Response to Comment A-2-8 above. As described therein, a Traffic Management Plan would be developed as required under MM TRA-1. Additionally, project measure PM-TRA-2, identified in Section 3.14.7 of the Recirculated Draft EIR, specifies best management practices and regulations and policies to which construction activities must adhere, including installation of signage and other controls to maintain pedestrian and vehicle safety. As discussed in Section 3.14 of the Recirculated Draft EIR, traffic controls to ensure pedestrian and vehicle safety would be implemented as required by MM TRA-1 and PM TRA-2, and traffic impacts have been mitigated to less than significant. As such, further mitigation is not required.

### Comment A-2-11

- Haul routes are not to pass by any school, except when school is not in session.

### Response to A-2-11

As explained in Section 3.14.6.1 of the Recirculated Draft EIR, transporting and hauling of construction-related materials would occur along designated truck routes within the Project corridor ROW and/or major streets connecting to construction staging areas and the nearest freeways (e.g., SR-60, I-5, and I-605). As identified Section 3.14.6.1, the haul routes would be determined in cooperation with the jurisdictions along the corridor consistent with local land use and mobility plans and would be situated to minimize noise, vibration, and other possible impacts and impacts associated with hauling were determined to be less than significant. The analysis considered proximity of schools to haul routes, such as the KIPP Raices Academy at 668 Atlantic Boulevard, and determined that no significant impacts with respect to proximity to haul routes would occur, including potential impacts associated with traffic safety (Section 3.14), air quality (Section 3.2), noise and vibration (Section 3.11), and hazards and hazardous materials (Section

3.8). The 4th Street Primary Center is located 469 Amalia Avenue. The rear of the school is on Atlantic Boulevard, which is a major arterial that is designated and currently used for truck traffic so haul trucks would not be a new or inconsistent use on this roadway. The 4th Street Primary Center's pedestrian entrance is accessed from Amalia Avenue and Eagle Street. These streets would not be used as haul routes and therefore, students would not be entering and exiting the school onto a street that could be used for hauling. Additionally, the Recirculated Draft EIR has been revised to add following bullet to MM TRA-1 on page 3.14-48 and page 3.14-49:

- *Contractors shall maintain safe and convenient pedestrian routes to school by ensuring project haul routes and construction traffic, to the greatest extent possible, avoid any published school pedestrian routes.*

Further, as identified in Section 3.11.6.1 of the Recirculated Draft EIR, the addition of construction traffic, including assuming a higher noise factor for haul trucks, would not be so substantial that it would result in an acoustically perceptible change in ambient noise levels. Mitigation measure MM NOI-5 requires the contractor to route construction traffic and haul routes along roads in areas without receptors sensitive to noise and vibration where practicable; such receptors would include LAUSD schools.

No significant impacts associated with haul trucks have been identified and as discussed in Section 3.14.6 through Section 3.14-8 of the Recirculated Draft EIR, all construction traffic impacts are less than significant with implementation of mitigation and further mitigation is not required.

### Comment A-2-12

- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.

### Response to A-2-12

Designated construction staging areas have been identified located along the alignment that would be used for parking of construction related vehicles. None of these sites is located at or immediately adjacent to LAUSD schools. Further, as stated in Section 2.6.2 in Chapter 2, Project Description, in the Recirculated Draft EIR, if any construction staging on public sidewalks, streets, or private property is necessary, temporary easements for these activities would be obtained. Construction staging areas are addressed in further detail in Appendix P and Volume 2 of the Recirculated Draft EIR. As discussed in Section 3.14.6 through Section 3.14.8 of the Recirculated Draft EIR, construction traffic impacts have been mitigated to less than significant and further mitigation is not required.

### Comment A-2-13

- Funding for crossing guards or flaggers, at the project proponent's expense, is required any time the safety of children may be compromised by construction-related activities at impacted school crossings.

### Response to A-2-13

As described in Section 3.14.7 of the Recirculated Draft EIR, a Traffic Management Plan would be implemented to help ensure that adequate and safe access would remain available to schools and other facilities within the Project construction zone as required by mitigation measure MM TRA-1.

Additionally, the Recirculated Draft EIR has been revised to add following bullet to MM TRA-1 on page 3.14-48 and page 3.14-49:

- *Construction flaggers shall be implemented any time a construction ingress or egress is located within 200 feet of a schools' student entrance during school hours.*

The same edit has been made to MM TRA-1 on page 141 and 142 of Appendix N, Transportation and Traffic Impacts Report. As discussed in Section 3.14.6 through Section 3.14.8 of the Recirculated Draft EIR, construction traffic impacts have been mitigated to less than significant and further mitigation is not required.

### Comment A-2-14

- Barriers and/or fencing shall be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.

### Response to A-2-14

As discussed in Section 3.13.6.1 of the Recirculated Draft EIR and Section 3.3.3 of Appendix P, Construction Impacts, of the Recirculated Draft EIR, for security purposes, construction staging areas would be equipped with security measures to discourage vandalism and theft. As addressed in Section 3.13, Public Services and Recreation, no significant impacts associated with police protection services would occur and mitigation is not required.

### Comment A-2-15

- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

### Response to A-2-15

The Contractor shall implement safety and security measure as required by Metro's Construction Safety and Security Manual. See Response to Comment A-2-14 regarding construction safety measures. As addressed in Section 3.13, Public Services and Recreation, no significant impacts associated with police protection services would occur and mitigation is not required.

### Comment A-2-16

- Los Angeles Unified's Transportation Branch must be contacted at (213) 580-2900 regarding the project's potential effect upon existing school bus routes.

### Response to A-2-16

The Recirculated Draft EIR has been revised to specifically require that coordination with school districts would occur during construction, including in regard to activities that could affect bus routes and bus stops. The following bullet has been added to MM TRA-1 on page 3.14-48 and page 3.14-49:

- *Metro's construction outreach efforts shall include reaching out to local school district administrators to provide advanced information regarding construction activities and/or detours if construction activities will affect bus routes and stops to schools.*

The same edit has been made to Appendix N, Transportation and Traffic Impacts Report.

Additionally, the Traffic Management Plan requires Metro to develop and implement an outreach program and public awareness campaign in coordination with transit agencies to inform the general public about the construction process and planned roadway closures, potential impacts, and mitigation measures, including temporary bus stop relocation.

### Comment A-2-17

- The Project Manager or designee shall notify the Los Angeles Unified Transportation Branch of the expected start and ending dates for various portions of the proposed project that may affect traffic within the nearby school areas.

### Response to A-2-17

As identified in Section 3.14.7 of the Recirculated Draft EIR, MM TRA-1 includes a coordinated outreach program with local jurisdictions and business owners to inform the general public about the construction process and activities. Additionally, as identified in Response to Comment A-2-16, mitigation measure MM TRA-1 in the Recirculated Draft EIR has been revised to specifically require that coordination with school districts would occur.

### Comment A-2-18

- School buses must have unrestricted access to Los Angeles Unified schools.

### Response to A-2-18

See Responses to Comments A-2-8, A-2-10, and A-2-16 above. Additionally, the Recirculated Draft EIR has been revised to add following bullet to MM TRA-1 on page 3.14-48 and page 3.14-49:

- *Access to adjacent businesses and schools (including access to passenger loading areas for student drop-offs at schools) shall be provided via existing or temporary driveways or loading zones during business and school hours throughout the construction period.*

The same edit has been made to MM TRA-1 on page 141 and 142 of Appendix N, Transportation and Traffic Impacts Report.

### Comment A-2-19

- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.

### Response to A-2-19

Given the extent of construction activities that would occur and the fact that lane closures would be required, it is not possible to avoid all traffic delays. However, much of the construction occurring in the vicinity of the schools identified in Comment A-2-2, would occur underground (i.e., tunneling), which would reduce the need for lane closures and the potential for associated traffic delays. Additionally, the Traffic Management Plan would minimize the delays associated with construction. As explained in Section 3.14.7 of the Recirculated Draft EIR, MM-TRA-1 would require preparation of a Traffic Management Plan that would include developing detour routes to facilitate traffic movement through construction zones without significantly increasing cut-through-traffic in adjacent residential areas, and where necessary, traffic control officers would be at major intersections during peak hours if delays are related to construction activities. Vehicle delay is not considered a significant impact under CEQA and no additional mitigation associated with potential vehicle delay is required.

### Comment A-2-20

- During and after construction, changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.

### Response to A-2-20

Given the extent of construction activities that would occur and the fact that lane closures would be required, it is not possible to avoid all effects on traffic. However, as explained in Section 3.14.7 of the Recirculated Draft EIR, MM TRA-1 requires preparation of a Traffic Management Plan that would include developing detour routes to facilitate traffic movement through construction zones without significantly increasing cut-through-traffic in adjacent residential areas. As identified in Response to Comment A-2-16, MM TRA-1 has been revised to specify that Metro's construction outreach efforts will include providing advanced information regarding construction activities and/or detours if construction activities will affect bus routes and stops to schools. With implementation of MM TRA-1, traffic impacts during construction would be less than significant and further no further mitigation is required.

Operation of the Project within the LAUSD boundary would be underground and therefore, would minimally affect traffic patterns, traffic light patterns or bus stop locations, and LAUSD school bus stops and school bus operations would not be significantly impacted.

### Comment A-2-21

- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.

### Response to A-2-21

Construction contractors would comply with all existing California Vehicle Code requirements. Accordingly, no changes to the mitigation measures in the Recirculated Draft EIR are required.

### Comment A-2-22

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.

### Response to A-2-22

See Responses to Comments A-2-10 and A-2-16 above regarding the Traffic Management Plan required by mitigation measure MM TRA-1. Additionally, as discussed in Section 3.14.7.1 of the Recirculated Draft EIR, project measure PM TRA-2 ensures the Project would be designed and constructed per applicable State, Metro, and city design criteria and standards, including Metro's design and safety standards (i.e., MRDC) and the California Manual of Uniform Traffic Control Devices (CA MUTCD) which provides requirements and standards for temporary traffic control measures such as signage, for facilitating road users through a construction zone. As discussed in Section 3.14.7 of the Recirculated Draft EIR, traffic controls to ensure pedestrian and vehicle safety would be implemented as required by MM TRA-1 and PM TRA-2 and construction traffic impacts would be mitigated to less than significant. As such, further mitigation is not required.

### Comment A-2-23

- Contractors must maintain ongoing communication with Los Angeles Unified school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.

### Response to A-2-23

See Response to Comment A-2-16, Response to Comment A-2-17, and Response to Comment A-2-18 regarding coordination and communication during construction activities. As identified therein, Metro's standard construction outreach efforts include informing local school districts on construction schedule and activities. The requirement to coordinate with local school districts to provide information on construction related activities has also been added to MM TRA-1 (see Response to Comment A-2-16).

### Comment A-2-24

- Parents dropping off their children must have access to the passenger loading areas.

### Response to A-2-24

See Response to Comment A-2-18 regarding maintaining access to schools. As discussed therein, MM TRA-1 has been revised to include a requirement that access to adjacent schools be provided via existing or temporary driveways or loading zones during school hours throughout the construction period.

### Comment A-2-25

OEHS's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be either analyzed further or addressed to ensure the welfare of the students attending Los Angeles Unified schools, their teachers and the staff, as well as to assuage the concerns of the parents of the students. Therefore, the measures set forth in these comments should be adopted as conditions of project approval to offset unmitigated impacts on the students and staff at Los Angeles Unified schools. Thank you for your attention to this matter. If you need additional information, please contact me at (213) 241-3394.

### Response to A-2-25

The comment summarizing the purpose of OEHS's letter and review of the Recirculated Draft EIR and providing the name and phone number of the contact person at the department is noted. See Responses to Comments A-2-2 through A-2-24 that address the measures recommended by OEHS.

## A-3: California Department of Fish and Wildlife

### Comment A-3-1

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) for the Eastside Transit Corridor Phase 2 Project (Project) from the Los Angeles County Metropolitan Transportation Authority (LACMTA). Associated documents reviewed also included the Biological Resources Impacts Reports (BRIR). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the

Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

**Objective:** The Project would extend the Los Angeles County Metropolitan Transportation Authority L Line, a light rail transit line, from its current terminus at the Atlantic Station in the unincorporated community of East Los Angeles to the city of Whittier. It would extend the Metro L Line approximately 3.2 to 9.0 miles, depending on the Build Alternative. The Build Alternatives are: Alternative 1 Washington (Alternative 1), Alternative 2 Atlantic to Commerce/Citadel Initial Operating Segment (IOS) (Alternative 2), and Alternative 3 Atlantic to Greenwood IOS (Alternative 3). By extending the existing LACMTA L Line into eastern Los Angeles County, the Project will provide connectivity to other destinations along LACMTA's regional system. Further, the Project will reduce travel times and the need for transfers within the system by providing a one-seat ride via the Regional Connector.

**Location:** The Project area is generally bounded by I-10 to the north, Peck Road in South El Monte and Lambert Road in Whittier to the east, I-5 and Washington Boulevard to the south, and I-710 to the west. The new alignment corridor will run through five cities of Commerce, Montebello, Pico Rivera, Santa Fe Springs, and Whittier and communities of unincorporated East Los Angeles and Whittier-Los Nietos.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist LACMTA in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other

suggestions are also included to improve the environmental document. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

### Response to A-3-1

The role of the California Department of Fish and Wildlife (CDFW) is acknowledged. Responses to the specific comments and recommendations are provided in Responses to Comments A-3-2 through A-3-10 below.

### Comment A-3-2

Specific Comments

Comment #1: Impacts on Species of Special Concern – Reptiles

**Issue:** The Project may impact coastal whiptail (*Aspidoscelis tigris stejnegeri*) and western spadefoot toad (*Spea hammondii*), both species designated as California Species of Special Concern (SSC).

**Specific impacts:** Project construction and activities, directly or through habitat modification, may result in direct injury or mortality (trampling, crushing), reduced reproductive capacity, population declines, or local extirpation of an SSC. Also, loss of foraging, breeding, or nursery habitat for an SSC may occur.

**Why impacts would occur:** Table 6-1. Special-Status Wildlife and Plant Species Potential in the BRSA [Biological Resources Study Area] lists the coastal whiptail and western spadefoot toad as having potential suitable habitat in the BRSA. However, appropriate avoidance, minimization, or mitigation measures were not included in the DEIR in the event an SSC is discovered on site. Impacts to an SSC could result from ground-disturbing activities and vegetation removal. Wildlife may be trapped or crushed under structures. Large equipment, equipment and material staging, and vehicle and foot traffic could trample or bury wildlife. SSC could be injured or killed. Impacts on these SSC are more likely to occur because these are cryptic species that are less mobile and seek refuge under structures. In addition, focused surveys for amphibian and reptile species were not conducted for the DEIR to determine presence/absence on site. As such, there is potential for the Project to impact SSC.

**Evidence impacts would be significant:** A California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- Is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- Is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- Is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or

- Has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2022a).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).

Impacts to any sensitive or special status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. The DEIR does not provide mitigation for potential impacts on SSC. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

**Mitigation Measure #1: Biological Monitor** – To avoid direct injury and mortality of any SSC, CDFW recommends LACMTA require a qualified biologist on site to move out of harm's way wildlife of low mobility that would be injured or killed. Wildlife should be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to suitable habitat adjacent to the Project site. In areas where any SSC was found, work may only occur in these areas after a qualified biologist has determined it is safe to do so. Even so, the qualified biologist should advise workers to proceed with caution near flagged areas. A qualified biologist should be on site daily during initial ground and habitat disturbing activities and vegetation removal. Then, the qualified biologist should be on site weekly or bi-weekly (once every two weeks) for the remainder of Project until the cessation of all ground disturbing activities to ensure that no wildlife of any kind is harmed.

**Mitigation Measure #2: Scientific Collecting Permit** – CDFW recommends LACMTA retain a qualified biologist with appropriate handling permits, or should obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's Scientific Collection Permits webpage for information (CDFW 2022b). Pursuant to the California Code of Regulations, title 14, section 650, LACMTA/qualified biologist must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. The LSA Agreement may provide similar take or possession of species as described in the conditions of the agreement (see Comment #2 Impacts on Streams).

**Mitigation Measure #3: Wildlife Relocation Plan** – Prior to initial ground and habitat disturbing activities and vegetation removal, CDFW recommends LACMTA retain a qualified biologist to prepare a Wildlife Relocation Plan. The Wildlife Relocation Plan should describe all wildlife species that could occur within the Project site and proper handling and relocation protocols. The Wildlife

Relocation Plan should include species-specific relocation areas, at least 200 feet outside of the Project site and in suitable and safe relocation areas. No wildlife nests, eggs, or nestlings may be removed or relocated at any time.

**Mitigation Measure #4: Injured or Dead Wildlife** – If any SSC are harmed during relocation or a dead or injured animal is found, work in the immediate area should stop immediately, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and LACMTA within three calendar days of the incident or finding. The report should include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

## Response to A-3-2

This comment states that the Project would have impacts on Species of Special Concern and recommends several measures to address these impacts. Responses to these comments, and to the measures recommended by CDFW to address their comments, are provided below.

Recommended Mitigation Measures #1 through #4

CDFW states that Table 6-1 (in Appendix D of the Recirculated Draft EIR) indicates there is potential suitable habitat for the coastal whiptail and spadefoot toad within the biological resources study area (BRSA). Additionally, CDFW asserts that that, because of the potential presence of the whiptail and toad, significant impacts could occur. These statements do not fully or accurately reflect the information presented in Appendix D. As stated in Section 6.0 of Appendix D, wildlife habitats that exist within the BRSA are mainly associated with the BRSA of Alternative 1 where it crosses the Rio Hondo and the San Gabriel River and the Rio Hondo Spreading Grounds. Existing conditions of these natural areas within the Alternative 1 BRSA are shown in Figures 6.1 through 6.5 of Appendix D. Table 6-1, Special-Status Wildlife and Plant Species Potentially in the BRSA, identifies that "[s]uitable habitat is very limited within the BRSAs" for these two species, bearing in mind that the subject statement is a general characterization for the overall Alternative 1 BRSA, as shown in Figure 4-1 of Appendix D; however, in looking more specifically at the habitat present where proposed construction would occur (i.e., at the Washington Boulevard crossings over the Rio Hondo and San Gabriel River), the habitat at/near the proposed construction areas is not considered to be supportive of the subject species. Coastal whiptails require dense vegetation for cover that is not present in the proposed construction areas. Spadefoot toads require burrows within grasslands that are not present in the proposed construction areas. These determinations are supported by Appendix D Attachment A, the Terrestrial Biological Resources Technical Memorandum for the Project, which presents the findings of surveys for terrestrial biological resources that could be affected by the Project. The following information is from Section 3.2.2 of the memo:

No sensitive wildlife species were observed in the project area during the biological survey conducted on May 23 through May 25, 2016. Western spadefoot is unlikely to occur within or near either of the proposed LRT alignments due to lack of suitable vernal pools with surrounding grassland habitat. The most recent documented observation of western spadefoot near the project area was in temporary ponds within grazed non-native grassland in 1998 in the Puente Hills (Appendix D Attachment A). Coastal whiptail is unlikely to occur within or near the proposed LRT alignments due to lack of arid open areas with sparse foliage. The most recent documented

observation of coastal whiptail near the project area was in 2000 within the Sycamore Canyon area of the Puente Hills Landfill. (Appendix D Attachment A).

The remainder of the land within the Build Alternative BRSAs, including the MSF site options, is highly developed and covered with impervious surfaces such as parking lots and buildings. The highly developed nature of the project area is shown in Figures 6.6 through 6.14 in Appendix D, which provide aerial vegetation maps of the above-ground Alternative 1 alignment.

Therefore, Table 6-1 of Appendix D, Biological Resources Impacts Report has been revised to clarify that there is "*Very low or no potential to occur*" for both species.

As stated in Section 3.3.5.1 of the Recirculated Draft EIR, "[t]here are no known occurrences of special-status species in the BRSA of Alternative 1, and suitable habitat for special-status species was not observed during field investigations." The Recirculated Draft EIR concluded that the Project would have no impacts on special-status species. Due to the lack of suitable habitat in the BRSAs, the proposed Project would have no impacts on any Species of Special Concern and CDFW's recommended Mitigation Measures #1 through #4 are not necessary or required by CEQA.

## Comment A-3-3

Comment #2: Impacts to Streams

**Issue:** For Alternative 1, the DEIR proposes to replace one bridge column within the Rio Hondo, one column within the Rio Hondo Spreading Grounds, and four columns within the San Gabriel River.

**Specific impacts:** The Project has potential to result in temporary impacts to streams and biological diversity in and downstream of the Project. The BRIR states, "If groundwater is encountered during excavation for bridge piers, the excavation would be supported with the use of drilling muds, or the "wet method of construction." With this method, the hole is kept filled with a drilling fluid during the entire operation of drilling the hole and placing the reinforcing and concrete. The drilling fluid may consist of water if the hole is stable against collapse, or a prepared slurry designed to maintain stability of the hole. The drilling slurry is formed by adding either mineral bentonite or synthetic polymers to water and is maintained inside the drilled hole at least five or more feet higher than the groundwater level."

**Why impacts would occur:** Project activities may potentially introduce deleterious materials into the Rio Hondo, Rio Hondo Spreading Grounds, or San Gabriel River, potentially impacting fish and wildlife resources downstream. Drilling within the streambed, placing equipment into the riparian area, and introducing artificial structures to the bed, bank, or channel of a stream has the potential to alter flows and result in scouring of a streambed. Scouring during and after storm events could potentially lead to shifting or exposure of Project components, such as pipes or manholes, that may further alter the shape and flows of the stream and diminish downstream water quality. Placing heavy construction equipment into the Rio Hondo, Rio Hondo Spreading Grounds, or San Gabriel River could decrease water quality on the Project site via leaks of water, groundwater, oil, or other petroleum products. In addition, deleterious materials may contaminate the Rio Hondo, Rio Hondo Spreading Grounds, or San Gabriel River due to fracout. Bridge pier excavation has potential to release drilling fluids into the surrounding environment through frac-outs. A frac-out occurs when drilling fluids penetrate fractured bedrock, or seeps and flows into rock or sediment eventually reaching the surface. Because drilling muds consist largely of a

bentonite-clay mixture, they may not be classified as toxic or hazardous substances. However, if released into water bodies, bentonite has the potential to adversely impact fish and invertebrates.

**Evidence impacts would be significant:** CDFW concurs with the DEIR that construction of Alternative 1 would require a section 1602 Lake and Streambed Alteration Agreement with CDFW. Fish and Game Code section 1602 requires any person, State or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or,
- Deposit or dispose of material into any river, stream, or lake.

According to Fish and Game Code Section 5650 (a), it is unlawful to deposit in, permit to pass into, or place where it can pass into the waters of this state any of the following:

1. Any petroleum, acid, coal or oil tar, lampblack, aniline, asphalt, bitumen, or residuary product of petroleum, or carbonaceous material or substance.
2. Any refuse, liquid or solid, from any refinery, gas house, tannery, distillery, chemical works, mill, or factory of any kind.
3. Any sawdust, shavings, slabs, or edgings.
4. Any factory refuse, lime, or slag.
5. Any cocculus indicus.
6. Any substance or material deleterious to fish, plant life, mammals, or bird life.

Per Fish and Game Code 5652 (a), "It is unlawful to deposit, permit to pass into, or place where it can pass into the waters of the state, or to abandon, dispose of, or throw away, within 150 feet of the high water mark of the waters of the state, any cans, bottles, garbage, motor vehicle or parts thereof, rubbish, litter, refuse, waste, debris, or the viscera or carcass of any dead mammal, or the carcass of any dead bird." The Project may substantially adversely affect the existing stream pattern of the Project site through the alteration or diversion of a stream, which absent specific mitigation, could result in substantial erosion or siltation on site or off site of the Project. Debris, soil, silt, sawdust, rubbish, raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous or deleterious to aquatic life, wildlife, or riparian habitat resulting from Project related activities may enter the stream.

## Response to A-3-3

Erosion, siltation, and other water quality impacts in the Rio Hondo, Rio Hondo Spreading Grounds, and San Gabriel River are addressed in Section 3.9, Hydrology and Water Quality, of the Recirculated Draft EIR. Specifically, the Recirculated Draft EIR addresses the potential for Project operations and construction to result in alteration to the course of any stream or river, erosion and siltation, the introduction of contaminants, and other water quality impacts. The comment states that “[t]he Project may substantially adversely affect the stream pattern of the Project site through

the alteration or diversion of a stream, which …. could result in substantial erosion or siltation." However, the commenter does not provide substantial evidence to support this conclusion. To the contrary, as noted in the Recirculated Draft EIR, construction and operation would not substantially alter the course of a stream or river or result in substantial erosion. Moreover, project operations would be subject to regulatory requirements, including National Pollutant Discharge Elimination System (NPDES), low impact development (LID) standards, and local policies that would address water quality. In addition, construction work would be scheduled to occur in the dry season (per PM HWQ-3) and construction best management practices (BMPs) would be implemented to minimize potential impacts (per PM HWQ-2). However, the Recirculated Draft EIR acknowledges that, even with these measures, there is a potential for significant impacts to water quality related to construction across the Rio Hondo and San Gabriel River and the Rio Hondo Spreading Grounds. Mitigation is included in Section 3.9.7.2 of the Recirculated Draft EIR, and revised in the Final EIR, to address these impacts (MM HWQ-1, MM HWQ-2, MM HAZ-2, and MM HAZ-3). With implementation of these measures, impacts to water quality, including impacts related to hazardous materials, would be reduced to a level that is less than significant. These measures would prevent water quality impacts from occurring that could, in turn, adversely affect fish and/or wildlife in the stream.

The comment that CDFW concurs with the Recirculated Draft DEIR that construction of Alternative 1 would require a section 1602 Lake and Streambed Alteration Agreement with CDFW is noted. Metro will coordinate with CDFW to obtain all required permits for the Project and comply with any local, state, and federal laws.

## Comment A-3-4

Recommended Potentially Feasible Mitigation Measure(s):

**Mitigation Measure #5:** CDFW recommends the LSA Notification include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity within and downstream of the Project site. The hydrology report should also include an analysis to determine if Project activities will impact the current hydrologic regime or change the velocity of flows on site and downstream. The hydrology report should also determine if the Project will result in substantial changes to water availability downstream for biological resources. CDFW also requests a hydrological evaluation of any potential scour or erosion at the Project site and downstream due to a 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions to determine how the Project activities may change the hydrology on site.

**Mitigation Measure #6:** CDFW recommends the Project implement Best Management Practices (BMPs) to prevent erosion and the discharge of sediment and pollutants into drainages during Project activities. CDFW recommends BMPs be monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control. LACMTA should prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within stream areas. All fiber rolls, straw wattles, and/or hay bales utilized within and adjacent to the Project site should be free of nonnative plant materials. Fiber rolls or erosion control mesh should be made of loose-weave mesh that is not fused at the intersections of the weave, such as jute, or coconut (coir) fiber, or other products without welded weaves. Non-welded weaves reduce entanglement risks to wildlife by allowing animals to push through the weave, which expands when spread.

**Mitigation Measure #7:** The Project should not allow drill cuttings, drilling mud, and/or materials or water contaminated with bentonite, or any other substance deemed deleterious to fish or wildlife be allowed to enter the stream or be placed where they may be washed into the stream. Any contaminated water/materials from the drilling and/or project activities shall be pumped or placed into a holding facility and removed for proper disposal.

**Mitigation Measure #8:** The LACMTA should develop a frac-out contingency plan. The frac-out plan should establish operational procedures and responsibilities for the prevention, containment, and clean-up of frac-outs associated with proposed drilling activities.

## Response to A-3-4

This comment includes mitigation measures recommended by CDFW to address the agency's concerns regarding impacts to streams raised in Comment A-3-3. See Response to Comment A-3-3 for a general discussion of these concerns. Responses to CDFW's specific recommended mitigation measures are provided below.

Recommended Mitigation Measure #5

CDFW recommends that the Lake and Streambed Alteration Notification for the Project include a hydrology report to assess changes in hydrologic activity, velocity of flows, and water availability onsite and downstream of the Project and assess scour or erosion at the Project site. As discussed in Section 3.9.7.2 of the Recirculated Draft EIR, and revised in the Final EIR, mitigation measure MM HWQ-2 requires the construction of compensatory mitigation to compensate for potential loss of flood storage and infiltration potential due to placement of the bridge piers in federally authorized and Los Angeles County Department of Public Works (LACDPW) flood control facilities. Compensatory mitigation within the impacted flood control facility shall be based on the volume of the flood storage loss and a hydraulic analysis in compliance with applicable Federal, state, and local requirements, such as the Rivers and Harbors Act Section 408 program. The planning, design, and engineering of that compensatory mitigation will include the types of evaluations delineated in CDFW's recommended measure, which can be provided to, and reviewed by, CDFW as part of the Lake and Streambed Alteration Notification for the Project. In response to this comment, Mitigation measure MM HWQ-2 has been updated to include the following text:

A hydrology report to assess changes in hydrologic activity, velocity of flows, and water availability onsite and downstream of the Project and assess scour or erosion at the Project site will be prepared and submitted to CDFW in conjunction with the Lake and Streambed Alteration Notification for the Project.

Recommended Mitigation Measure #6

CDFW's recommendation to include a mitigation measure to implement BMPs to prevent erosion and the discharge of sediments and pollutants is noted. Project measure PM HWQ-2, discussed in Section 3.9.7.1 of the Recirculated Draft EIR and revised in the Final EIR, already requires the implementation of BMPs for this purpose. Specifically, in accordance with PM HWQ-2, Metro would establish an erosion and sediment control plan prior to the initiation of construction activities. BMPs to control erosion may include the use of natural drainage, detention ponds, sediment ponds, or infiltration pits to collect runoff; use of barriers to direct and slow the rate of runoff; and use of down drains. Metro would also develop a Stormwater Pollution Prevention Plan (SWPPP) to ensure that pollutant discharges would be properly controlled. The SWPPP would

comply with SWRCB's NPDES Construction General Permit and would be subject to regular inspections by applicable jurisdictions to ensure compliance. Erosion-control BMPs and requirements of the plans are detailed in Section 3.9.7.1.

Regarding the suggestion that Metro should prohibit the use of erosion control materials potentially harmful to fish and wildlife species, as described in Response to Comment A-3-2, no sensitive wildlife species are anticipated to occur in the BRSAs due to the lack of suitable habitat. There would be no impacts on sensitive species and therefore, the addition of mitigation requiring the use of loose weave mesh to prevent wildlife entanglement is not required. Nonetheless, in response to CDFW's concerns, PM HWQ-2 in the Recirculated Draft EIR has been revised to include the following text:

> To protect fish and wildlife species, Metro shall prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting or similar material, in stream areas. Metro shall require the use of certified weed-free material for erosion control when working in areas of exposed soil.

Recommended Mitigation Measures #7 and #8

CDFW's recommendations to include mitigation measures related to drilling and developing a frac-out contingency plan are noted. With implementation of an existing project measure and existing mitigation measures, which are described in more detail below, impacts on surface water and groundwater quality from construction of the Project, including drilling activities, would be less than significant and no new mitigation measures are required. However, the mitigation measures provided in the Recirculated Draft EIR have been modified in the Final EIR to address CDFW's concerns, as described below.

As identified in PM HWQ-2 and noted above, Metro would implement a SWPPP to ensure that pollutant discharges during construction would be properly controlled. The SWPPP would comply with SWRCB's NPDES Construction General Permit and would be subject to regular inspections by applicable jurisdictions to ensure compliance. However, in addition to PM HWQ-2 and in response to CDFW's comment, the following bullet has been added to PM HWQ-2 on page 3.9-61 to page 3.9-62 of the Recirculated Draft EIR:

- Metro shall not allow drill cuttings, drilling mud, and/or materials or water contaminated with bentonite, or any other substance deemed deleterious to fish or wildlife, to enter the stream or be placed where they may be washed into the stream. Any contaminated water/materials from the drilling and/or project activities shall be pumped or placed into a holding facility and removed for proper disposal. The contractor shall develop a frac-out contingency plan, which will establish operational procedures and responsibilities for the prevention, containment, and clean-up of frac-outs associated with proposed drilling activities.

The same edits have been made to PM HWQ-2 on page 138 of Appendix J, Hydrology and Water Quality Impacts Report and page 6 of Appendix U, Project Measures.

As identified in PM HWQ-3, to the extent feasible, construction work within the Rio Hondo, Rio Hondo Spreading Grounds, and San Gabriel River will be scheduled to occur in the dry season when there is no water present. If work were to occur when water is present in the Rio Hondo and spreading grounds or the San Gabriel River, Metro would implement MM HWQ-1, discussed in Section 3.9.7.2, which requires water present in the work area to be isolated such that construction

does not occur in water. Therefore, any drilling fluid (i.e., bentonite) accidentally released during a frac-out would be contained and cleaned up in accordance with the SWPPP to prevent release to surface waters.

Moreover, per MM HAZ-3, discussed in Section 3.9.7.2, contractors would be required to inspect groundwater for signs of contamination, and if contaminated groundwater is found, halt work and test materials, and develop an investigation and site-specific groundwater management plan to ensure contaminants are not spread. Implementation of this mitigation measure would help minimize the spread of contaminated surface water and groundwater during Project construction and would reduce the potential impact to less than significant.

### Comment A-3-5

**Recommendation #1:** CDFW's issuance of an LSA Agreement for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the LACMTA for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

To compensate for any on- and off-site impacts to wetlands or riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on and/ or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity

### Response to A-3-5

Sections 3.3 and 3.9 of the Recirculated Draft EIR fully identify potential impacts on stream and riparian resources and provide project measures and mitigation measures for protecting these resources. Specifically, Section 3.9.7.1 provides erosion and pollution control measures that would be implemented during operation and construction of the Project, which would avoid impacts on downstream resources. No additional analysis is required, and no additional mitigation measures need to be included in the Recirculated Draft EIR.

### Comment A-3-6

Comment #3: Impacts to Trees and Tree Replacement

**Issue:** An unknown number of trees may be removed or disturbed during construction activities.

**Specific impact:** The Project will remove an unknown number and unknown species of trees. Project activities that result in the removal of trees may cause temporary or permanent impacts to wildlife that utilize the tree as habitat. In addition, Project activities that involve removal of trees have the potential to result in the spread of tree insect pests and disease into areas not currently exposed to these stressors. This could result in expediting the loss of trees in California which may support a high biological diversity including special status species.

**Why impacts would occur:** Page 18 of the BRIR states, "Most of the municipalities do not have specific replacement requirements and mitigation is developed on a case-by-case basis within each jurisdiction." However, page 79 of the BRIR states, "Local tree protection policies typically require

tree removal permits which may include tree replacement or relocation under a plan prepared in compliance with tree protection policies." It is unclear which cities may have their own tree replacement policies, if at all. If so, the DEIR does not present what these replacement policies are nor does it present any tree replacement mitigation in the event there are no policies in place. CDFW is therefore unable to determine if these policies are sufficient in mitigating for impacts to trees removed. The lack of mitigation measures in the DEIR may result in an ultimate total net loss of trees associated with the Project activities.

Moreover, all trees on site may provide habitat for wildlife within the Project vicinity. These trees may provide adequate habitat for nesting birds and small mammals. Removal of trees on site may temporarily or permanently impact available habitat for wildlife in the area. The loss of trees should be included in the mitigation efforts.

Lastly, there is no proposed investigation and plan for managing tree pests or pathogens at the time of removal. This may result in the introduction of pests, pathogens, or diseases to areas where they previously have not been found.

**Evidence impacts would be significant:** The greater Los Angeles area is home to a wide variety of migratory and non-migratory species of birds that utilize the urban ecosystem. Studies have shown that street trees provide necessary foraging habitat to birds and are a critical resource to promote avian biodiversity. Feeding bird density has been shown to be positively associated with increases in density and size of street trees. In addition, there is evidence that avian species generally prefer native street-tree species and only a few nonnative tree species for foraging (Wood & Esaian 2020). CDFW is concerned that without sufficient mitigation for the loss of street trees, there will be a negative impact of wildlife species, such as birds, in the alignment area that would use these street trees for potential nesting and foraging habitat. Lastly, without a proper investigation and management plan, the Project may also result in an adverse effect, either directly or through habitat modifications, by exposing other habitats to insect and/or disease pathogens. Exposure to insect and/or disease pathogens may have a substantial adverse effect on any sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s):

**Mitigation Measure #9:** An infectious tree disease management plan should be developed and implemented prior to initiating Project activities. All trees scheduled for removal should be identified and counted to provide total numbers and species type. In addition, trees scheduled for removal resulting from the Project should be inspected for contagious tree diseases including but not limited to: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees should not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.

**Mitigation Measure #10:** Given that the DEIR does not provide justification for how any city mitigation ratio would adequately reduce impacts to below a level of significance while considering temporal loss, native trees, size of trees, potential mitigation failure, or other factors, CDFW recommends replacing native trees with at least a 3:1 ratio. CDFW also recommends replacing non-native trees with at least a 1:1 ratio with native trees.

## Response to A-3-6

This comment pertains to the removal or disturbance of trees during construction activities. Subsequent to publication of the Recirculated Draft EIR, the Metro Board of Directors adopted the agency's first tree policy to help preserve and grow Los Angeles County's urban tree canopy. The LA Metro Tree Policy will protect trees impacted by Metro construction activity and includes a tree replacement and establishment program in the event tree removals are unavoidable. In accordance with the new policy, Metro would plan and design project construction so that large, healthy trees are preserved to the extent possible. Prior to construction, Metro would prepare a tree protection plan identifying tree protection zones for all trees designated for protection. The plan would protect the designated trees from immediate and delayed construction-related damage, such as loss of root area or soil compaction. Metro would also prepare a mitigation plan, in consultation with a certified arborist, for damaged trees and trees whose removal cannot be avoided. Street trees removed in association with the Project would be replaced at a minimum 2:1 ratio with 36-inch box trees (i.e., young trees with a large root ball) at or near the removal location, or consistent with the current Metro Tree Policy. In the case of heritage or protected trees, all options would be exhausted before such trees are removed. When necessary, trees that are designated as heritage trees by a local ordinance would be replaced at a 4:1 ratio by the trees of the same variety. Replacement trees would be California native trees or similar species with low water demand, ability to provide shade, and compatibility with regional efforts to mitigate exposure to high heat. The plant establishment period would be consistent with the Metro Tree Policy. Section 3.3 of the Recirculated Draft EIR and Appendix D, Biological Resources Impacts Report, have been revised to reflect the new LA Metro Tree Policy. Each of the revisions to Recirculated Draft EIR are listed in Chapter 2, Corrections and Additions, of this Final EIR.

This comment states that the removal of trees associated with Project implementation would have impacts on wildlife that utilize the trees as habitat, and to trees that would not be removed due to pests and disease. This comment recommends several measures to address these impacts. Responses to these specific comments, and to the measures recommended by CDFW to address their comments, are provided below.

Recommended Mitigation Measure #9

The comment expresses CDFW's concern that the tree removals associated with the Project may expose other habitats to insect and/or disease pathogens directly or indirectly through habitat modification. To address this concern, CDFW recommends a mitigation measure related to controlling infectious tree disease. Based on site surveys and review of aerial imagery, as discussed in Section 6.7 of Appendix D of the Recirculated Draft EIR, street trees along the alignments of the Build Alternatives and within the MSF site options are primarily nonnative and ornamental. As described in Section 6.5 of Appendix D, individual street trees were not considered a vegetation community unless they were grouped together to form a canopy; in these cases, street trees were counted as ornamental vegetation. As shown in Figure 6.6 through 6.14 of Appendix D, there are very limited areas of ornamental vegetation along the above-ground portion of the Build Alternatives' alignments; these are within the river channels and spreading grounds. Rather, the majority of street trees along the alignments are isolated from each other and therefore less susceptible to insect pests (Garcia et al 2022). Furthermore, during the preliminary survey of street trees that may be removed by the Project, no black walnut trees (susceptible to thousand canker fungus), or oak trees (susceptible to goldspotted oak borer) were noted.

Mitigation measure MM BIO-5 and MM BIO-6 have been revised to require construction vehicles and equipment operating within rivers and spreading grounds to be cleaned in accordance with

the Invasive Plant and Infectious Tree Disease Mitigation Plan to remove pathogens, invasive plant seeds, or plant parts. Only Alternative 1 would cross the rivers and spreading grounds; thus, this mitigation is only needed for construction of Alternative 1. Implementation of MM BIO-5 and MM BIO-6 would reduce impacts for Alternative 1 to less than significant. In addition, the Project would comply with the recently adopted LA Metro Tree Policy, which requires that during the tree establishment period a certified arborist would assist in basic tree maintenance with regular inspections to determine the trees' needs, including pest management. MM BIO-5 and MM BIO-6 have been revised on page 3.3-33 of the Recirculated Draft EIR and page 92-93 of Appendix D, Biological Resources Impacts Report, as follows:

**MM BIO-5:** *Prior to construction, the Contractor shall prepare an Invasive Plant and Infectious Tree Disease Mitigation Plan t*~~T~~o minimize the introduction *or migration* of invasive plant species into *other* construction areas~~,~~. *The plan shall be implemented where construction activities cross the rivers and spreading grounds and shall include, at a minimum, the following:*

- *C*~~c~~*onstruction* vehicles and equipment shall be cleaned *of pathogens and/or invasive or diseased plants and/or seeds* with compressed water or air ~~within a designated containment area to remove pathogens, invasive plant seeds, or plant parts and dispose of them in an appropriate disposal facility.~~*, or similar compression device, before working in an area of exposed soil and before leaving the area of exposed soil during the course of construction.*

- *Cleaning of equipment shall occur within a designated containment area to avoid the spread of pathogens, invasive plant seeds, or plant parts.*

- *Materials removed from construction equipment pursuant to this measure shall be disposed of at an appropriate disposal facility in accordance with applicable laws and regulations.*

- *Trees removed during construction shall be inspected for contagious tree diseases, and diseased trees shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.*

**MM BIO-6:** *In accordance with the Invasive Plant and Infectious Tree Disease Mitigation Plan identified in MM BIO-5 for construction across rivers and spreading grounds, t*~~T~~he contractor shall wash soil and plant material off all equipment tires and treads *or otherwise clean the construction vehicles and equipment as specified in the Plan* before moving from one construction area, or area of exposed soil to another (or moving to and from the staging area to the area of exposed soil).

Recommended Mitigation Measure #10

CDFW raises several additional issues pertaining to the removal of street trees, including the loss of habitat provided by the trees and the adequacy of existing local jurisdictions' regulations pertaining to tree removals.

With regard to local jurisdictions' regulations and policies pertaining to tree removals, the comment states that "CDFW is .... unable to determine if these policies are sufficient in mitigating

for impacts to trees removed" and further states that "[t]he DEIR does not provide justification for how any city mitigation ratio would adequately reduce impacts to below a level of significance while considering temporal loss, native trees, size of trees, potential mitigation failure, or other factors." The threshold of significance pertaining to local policies or ordinances that protect biological resources that is used in the Draft Recirculated EIR is from Appendix G of the CEQA Guidelines. In accordance with this threshold, the Draft Recirculated EIR assesses whether the Project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. As discussed in Section 3.3.2.3 of the Recirculated Draft EIR, Los Angeles County and cities within the Build Alternative BRSAs have local regulations pertaining to the protection of street trees in public areas and cutting or removal of trees would require permits from these jurisdictions. These regulations are discussed in more detail in Section 3.3.2 of Appendix D, which specifies that, while Los Angeles County requires the replacement of any removed tree, the ordinances of other jurisdictions are less specific with respect to the need to replace removed trees. As discussed in Section 3.3.6.4 of the Recirculated Draft EIR, any Project-related construction activities that require tree removal would be conducted in compliance with local policies and municipal codes protecting native trees and street trees. Thus, the Recirculated Draft EIR concluded that impacts with respect to local policies or ordinances that protect biological resources, such as trees, would be less than significant. As noted above, subsequent to the publication of the Recirculated Draft EIR, Metro adopted the LA Metro Tree Policy. Among other measures, the policy would require replacement of any street trees removed in association with the Project. The Project would comply with the new LA Metro Tree Policy, which addresses native trees, size of trees, and potential mitigation failure, among other factors.

CDFW comments that the trees that could be removed with Project implementation may provide habitat for wildlife within the Project vicinity, and that removal of trees may temporarily or permanently impact available habitat for wildlife in the area. Additionally, CDFW states that "without sufficient mitigation for the loss of street trees, there will be a negative impact on wildlife species, such as birds, in the alignment area that would use these street trees for potential nesting and foraging habitat." The thresholds of significance for biological resources used in the Recirculated Draft EIR focus on substantial adverse effects to special-status species or sensitive natural communities; and substantial interference with the movement of any native resident wildlife species, established native resident or migratory wildlife corridors, or wildlife nursery sites. With the exception of the portion of the Alternative 1 BRSA where it crosses the Rio Hondo and the San Gabriel River and the Rio Hondo Spreading Grounds, the study area is highly developed and covered with impervious services such as parking lots and buildings. The study area does not provide high value habitat or support terrestrial wildlife corridors. Although the removal of trees may reduce foraging and nesting sites, the reduction of trees by itself would not result in substantial adverse effects to biological resources as defined by the significance thresholds used in the EIR. The Recirculated Draft EIR correctly assesses impacts on special status species and migratory birds from removal of trees, per CEQA requirements. As mentioned in Section 3.3.5.3, no sensitive vegetation communities were identified along the alignments for Alternatives 1, 2, or 3, or the MSF site options. Impacts on special-status species are discussed in more detail in Section 3.3.6.1 of the Recirculated Draft EIR and Section 7.1 of Appendix D. Based on this analysis, the Project would not impact special-status species because of the developed nature of the BRSA and the lack of suitable habitat along the alignment. Impacts on migratory birds from tree removal are addressed in Section 3.3.6.1 of the Recirculated Draft EIR and Section 7.1 of Appendix D, as revised by this Final EIR. Implementation of MM BIO-4, which requires nesting bird surveys and avoidance of active nests if vegetation is removed or disturbed during the bird nesting season, would ensure that bird nests would be avoided. Thus, as concluded in Section 3.3.8 of the

Recirculated Draft EIR, impacts on migratory birds from implementation of the Project, which includes impacts from tree removal, would be less than significant.

## Comment A-3-7

Additional Recommendations

**Recommendation #2:** CDFW recommends modifying BIO-MM-1 to include underlined language and remove language with strikethrough.

"Up to a year prior to demolition work occurring at bridges, and in coordination with CDFW, bat emergence surveys and nighttime surveys shall be conducted at each affected bridge site to confirm whether bats are roosting on or within 100 feet of any of the bridges affected by construction activities. Surveys shall be scheduled by Metro or the contractor. Surveys shall be conducted using ultrasonic detectors and night vision technology in order to capture species and emergence locations. Surveys shall include species classification of detected bat calls to help identify bat species roosting within 100 feet of the construction area. If it is determined that bat species are roosting on or within 100 feet of the bridges affected by construction activities, MM BIO-3 shall be implemented.

If maternity roosts are found, to the extent feasible, work should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30). If maternity roosts are found and LACMTA determines that impacts are unavoidable, a qualified bat specialist should conduct a preconstruction survey to identify those trees proposed for disturbance that could provide hibernacula or nursery colony roosting habitat. Acoustic recognition technology should be used to maximize the detection of bats. Each tree identified as potentially supporting an active maternity roost should be closely inspected by the bat specialist no more than 7 days prior to tree disturbance to determine the presence or absence of roost bats more precisely. If maternity roosts are detected, trees/structures determined to be maternity roosts should be left in place until the end of the maternity season. Work should not occur within 100 feet of or directly under or adjacent to an active roost. Work should also not occur between 30 minutes before sunset and 30 minutes after sunrise."

**Recommendation #3**: CDFW recommends modifying BIO-MM-2 to include underlined language and remove language with strikethrough.

"Prior to demolition work occurring at bridges and outside of the bird nesting season for cliff swallows (February 15 to August 31), inactive swallow nests on or within 100 feet of the affected bridges shall be surveyed by a qualified biologist to determine whether they are occupied by roosting bats. Nests should be removed prior to overwintering use by bats and in a manner that ensures they do not fall to the ground or are otherwise destroyed unless absence of bats is confirmed through inspection by a qualified bat biologist. ~~If the nests are unoccupied, they shall be removed under the direction of a qualified biologist. Any nests occupied by bats shall be removed under supervision of a qualified biologist in consultation with CDFW during nighttime hours following the evening emergence of occupying bats.~~ The DEIR will incorporate mitigation measures in accordance with California Bat Mitigation Measures (Johnston et al. 2004)."

**Recommendation #4**: CDFW recommends modifying BIO-MM-4 to include underlined language and remove language with strikethrough

"To the extent feasible, ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal during the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs. Prior to the implementation of construction activities (e.g., demolition of structures, excavation, grading, construction of access roads) that would result in removal of or disturbances to vegetation and structures providing bird nesting habitat, and prior to pile driving near active bird nests and maintenance activities (e.g., tree trimming) during the bird nesting season, which generally runs from January 1 through September 1, the following shall occur:

One ~~biological~~ nesting bird survey shall be conducted 72 hours prior to construction or maintenance that shall remove or disturb suitable nesting habitat during the breeding season. The survey shall be performed by a biologist with experience conducting breeding bird surveys. The biologist shall prepare a survey report within 24 hours of conducting the survey, documenting the presence or absence of any active nest of a migratory bird. If an active nest is located, an appropriate no-work buffer shall be established. Buffers may be as large as 300 feet for migratory bird nests and 500 feet for raptor nests. ~~by CDFW and v~~ Vegetation removal within the buffer shall be postponed until the nest is vacated and juveniles have fledged (minimum of six weeks after egglaying) and when there is no evidence of a second attempt at nesting."

It should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the permanent removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

**Recommendation #5:** The DEIR states, "Some migratory birds could nest in street trees along Alternative 1 and within station footprints and the Commerce MSF site option. Cliff swallows were observed nesting under the Washington Boulevard bridge during surveys." CDFW recommends the following measures be incorporated into the DEIR to protect cliff swallows (*Petrochelidon pyrrhonota*) during construction activities:

*Swallow Nesting*. Construction should either occur outside of the swallow nesting period (March 15 through August 31), or the suitable bridge nesting habitat should be netted by LACMTA before initiation of the breeding season to prevent nesting. The netting should remain in place until August 1 or until construction activities at the site are complete. The netting should be anchored such that swallows cannot attach their nests to the structure through gaps in the net. If swallows begin building nests on the structure after net installation, the mud placed by the swallows should be removed and the net's integrity repaired.

*Swallow Exclusion*. LACMTA should exclude swallows from areas where construction activities cause nest damage or abandonment.

*Swallow Inspection*. Weekly inspection of the bridge for nesting activity should begin by March. If cliff swallows begin colonizing the bridge prior to beginning bridge work, all nest precursors (mud placed by swallows for construction of nests) should be washed down at least once daily until swallows cease trying to construct nests. This activity should not result in harm or death to adult swallows. This weekly inspection and washing activity should occur until April 1, after that period, no washing activity should occur to prevent harm or death to eggs or nestlings.

*Swallow Nest Removal*. Swallow nests should be removed in the fall after nesting season (February 15 to August 31) to prevent swallows from further nesting within the Project area during construction activities and only after nests are confirmed to be inactive.

**Recommendation #6:** CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species detected by completing and submitting CNDDB Field Survey Forms (CDFW 2022c). This includes all documented occurrences of special status species. LACMTA should ensure the data has been properly submitted, with all data fields applicable filled out, prior to Project ground-disturbing activities. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. The LACMTA should provide CDFW with confirmation of data submittal.

**Recommendation #7:** Per Public Resources Code section 21081.6(a)(1), CDFW has provided the LACMTA with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A). A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

## Response to A-3-7

This comment provides recommended modifications to several mitigation measures included in the Recirculated Draft EIR and the inclusion of new mitigation. Responses to these recommendations are provided below.

Recommendation #2

CDFW recommends modifications to BIO MM-1 to address impacts to bats. The Recirculated Draft EIR includes three measures to address impacts to bats, BIO MM-1, BIO MM-2, and BIO MM-3. If roosting bats are found during the surveys required by BIO MM-1, MM BIO-3 would be implemented, which requires consultation with CDFW and development of a CDFW-approved bat exclusion plan. Bat exclusion measures would be implemented to reduce the potential for bat presence (including maternity roosts), and additional pre-construction surveys would confirm the exclusionary measures have been successful. If bats remain, additional measures would be implemented as necessary and in coordination with CDFW to prevent impacts to bats. Therefore, the recommended revisions to MM BIO-1 provided in this comment are not needed.

To clarify that trees within 100 feet of affected bridges are to be included in the survey area described in MM BIO-1, MM BIO-1 has been modified in the Final EIR to add the following sentence after the first sentence:

> *Surveys shall include identification of any trees within 100 feet of the bridges affected by construction activities that could provide hibernacula or nursery colony roosting habitat*.

This change has been made on page 3.3-32 of the Recirculated Draft EIR and page 85 of Appendix D, Biological Resources Impacts Report.

In addition, MM BIO-3 has been modified in the Final EIR to add the following text to the first sentence of the second bullet: *including tree roosts* after "within 100 feet of the affect bridges." This

change has been made on page 3.3-32 of the Recirculated Draft EIR and page 86 of Appendix D, Biological Resources Impacts Report.

Recommendation #3

CDFW's recommended modifications to MM BIO-2 are noted. In response to this comment, the first sentence of underlined text provided in Recommendation #3 will be added to MM BIO-2 and the strikethrough text will be deleted. For clarity, the updates to MM BIO-2 are as follows:

> *Nests shall be removed prior to overwintering use by bats and in a manner that ensures they do not fall to the ground or are otherwise destroyed unless absence of bats is confirmed through inspection by a qualified bat biologist.* ~~If the nests are unoccupied, they shall be removed under the direction of a qualified biologist. Any nests occupied by bats shall be removed under supervision of a qualified biologist in consultation with CDFW during nighttime hours following the evening emergence of occupying bats.~~

The text of MM BIO-3 provided in the Recirculated Draft EIR requires the development of a bat exclusion plan in consultation with, and subject to the approval of, CDFW. Therefore, the second sentence of underlined text recommended in this comment, which directs incorporation of mitigation measures in accordance with "California Bat Mitigation Measures" (Johnson et al. 2004), is not necessary and will not be added.

Note, the cliff swallow nesting period will be extended to February 15 through September 15 to be conservative and consistent with the bird nesting season included in CDFW's Recommendation #4.

Recommendation #4

CDFW's recommended modifications to MM BIO-4 are noted. In response to this comment, the following text will be added to the beginning of the first bullet of MM BIO-4:

> *If construction is scheduled to occur during the bird nesting season (generally February 15 through September 15, and as early as January 1 for some raptors), vegetation that will be impacted by the Project shall be removed in advance of the construction activities and outside the nesting season, if feasible, to avoid take of birds, raptors, or their eggs. If this is not feasible, prior to the implementation of construction activities, one nesting bird…*

The following text "…. during the bird nesting season, which generally runs from January 1 through September 1" will be deleted, as this information is redundant with the additional text. Additionally, MM BIO-4 has been further modified in the Final EIR to incorporate CDFW's recommended revisions to the first bullet of the measure (i.e., replacing "biological" with "nesting bird" and removing "by CDFW" from the clause requiring the establishment of a no-work buffer). MM BIO-4 has been modified in the Final EIR on page 3.3-33 of the Recirculated Draft EIR and page 86 of Appendix D, Biological Resources Impacts Report. For clarity, the first paragraph of MM BIO-4 has been revised as follows:

> Prior to the implementation of construction activities (e.g., demolition of structures, excavation, grading, construction of access roads) that would result in removal of or disturbances to vegetation and structures providing bird nesting habitat, ~~and~~ prior to pile driving near active bird nests, *and prior to tree trimming during the maintenance period* ~~during~~

~~the bird nesting season, which generally runs from January 1 through September 1~~, the following shall occur:

- *If construction is scheduled to occur during the bird nesting season (generally February 15 through September 15, and as early as January 1 for some raptors), vegetation that will be impacted by the Project shall be removed in advance of the construction activities and outside the nesting season, if feasible, to avoid take of birds, raptors, or their eggs. If this is not feasible, prior to the implementation of construction activities,* ~~One biological~~ *one nesting bird* survey shall be conducted 72 hours prior to construction or maintenance that shall remove or disturb suitable nesting habitat during the breeding season. The survey shall be performed by a biologist with experience conducting breeding bird surveys. The biologist shall prepare a survey report within 24 hours of conducting the survey, documenting the presence or absence of any active nest of a migratory bird. If an active nest is located, an appropriate no-work buffer shall be established ~~by CDFW~~ and vegetation removal within the buffer shall be postponed until the nest is vacated and juveniles have fledged (minimum of six weeks after egg-laying) and when there is no evidence of a second attempt at nesting. Buffers may be as large as 300 feet for migratory bird nests and 500 feet for raptor nests.

The comment also states that additional mitigation is required to compensate for the permanent removal of nesting habitat with the Project site, and that mitigation ratios would increase with the occurrence of a species of special concern or a CEQA-listed species. As noted in Section 3.3.5.1 of the Recirculated Draft EIR, there are no known occurrences of special-status species and no suitable habitat for special-status species with the BRSAs of Project alternatives or design options. Therefore, no mitigation is required for impacts to special-status species due to modifications to habitat. Moreover, as noted in Response to Comment A-3-6 above, removal of vegetation by itself would not result in substantial adverse effects to biological resources as defined by the significance thresholds used in the EIR; therefore, no mitigation for the removal of vegetation that may serve as nesting sites is required.

Recommendation #5

While cliff swallows are not a special-status species, in response to this comment, MM BIO-4 has been revised on page 3.3-33 of the Recirculated Draft EIR and page 86 of Appendix D, Biological Resources Impacts Report to add the following bullets:

The following shall occur if Alternative 1 is selected and approved:

- *Swallow Nesting and Exclusion. Demolition work occurring at the Washington Boulevard bridges shall either occur outside of the swallow nesting period (February 15 through September 15) or Metro shall exclude swallows from areas along the bridges where demolition activities would cause nest damage or abandonment (i.e., on any part of the bridges) using netting. The netting shall remain in place until August 1 or until construction activities at the site are complete. The netting shall be anchored such that swallows cannot attach their nests to the structure through gaps in the net. If swallows begin building nests on the structure after net installation, the mud placed by the swallows shall be removed and the net's integrity repaired.*

- *Swallow Nesting Inspection. If demolition of the Washington Boulevard bridges occurs between February 15 through September 15, the portion of the bridges where construction activities would occur shall be subject to weekly inspection for nesting activity in that time period. If cliff swallows begin colonizing the bridge(s) prior to beginning bridge work, all nest precursors (e.g., mud placed by swallows for construction of nests) shall be washed down at least once daily until swallows cease trying to construct nests. This activity shall not result in harm or death to adult swallows. This weekly inspection and washing activity shall occur until April 1; after that period, no washing activity shall occur to prevent harm or death to eggs or nestlings.*

- *Swallow Nest Removal. Swallow nests on the Washington Boulevard bridges shall be removed in the fall after nesting season (February 15 to September 15), consistent with MM BIO-2, to further discourage swallows from nesting on the bridges during construction activities occurring within 100 feet of the bridges and only after nests are confirmed to be inactive.*

Note, the cliff swallow nesting period will be extended to February 15 through September 15 to be conservative and consistent with the bird nesting season included in CDFW's Recommendation #4.

Recommendation #6

Metro will report any special status species detected by completing and submitting CNDDB Field Survey Forms, per CDFW's request.

Recommendation #7

Metro will prepare a Mitigation Monitoring and Reporting Program (MMRP) in accordance with Section 21082.3 of CEQA and Section 15097 of the CEQA Guidelines. The MMRP will include all mitigation measures provided in the Final EIR for the Project, including any modifications to the mitigation measures that are included in the Final EIR in response to the comments received from CDFW.

## Comment A-3-8

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the LACMTA of Los Angeles and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

## Response to A-3-8

Metro will pay the CDFW filing fees as required by law.

### Comment A-3-9

Conclusion

We appreciate the opportunity to comment on the Project to assist the LACMTA in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the LACMTA has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at Felicia.Silva@wildlife.ca.gov or (562) 292-8105.

### Response to A-3-9

As required by Section 15088 of the CEQA Guidelines, Metro will provide CDFW with written responses to CDFW's comments at least 10 days prior to certification of the EIR and will notify CDFW of public hearing dates for the Project.

### Comment A-3-10

Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project. A final MMRP shall reflect results following additional plant and wildlife surveys and the Project's final on and/or off-site mitigation plans.

*[See the original Comment Submission A-3 located in Appendix A of the Final EIR for the referenced draft Mitigation and Monitoring Reporting Plan provided by CDFW]*

### Response to A-3-10

See Responses to Comments A-3-2 through A-3-9, which address the suggested new and revised mitigation measures. The timing and responsible party identified in Attachment A have been considered in development of the Mitigation and Monitoring and Reporting Program provided to the Metro Board of Directors for consideration.

## A-4: California Department of Transportation (Caltrans)

### Comment A-4-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. This is a recirculation of an earlier DEIR that was issued for public review on August 22, 2014. Per CEQA Guidelines, recirculation is required when significant new information is added to the EIR after the public review notice was given, such as changes to either the Project or environmental setting.

### Response to A-4-1

Comment noted.

### Comment A-4-2

The Project would extend the Los Angeles County Metropolitan Transportation Authority L (Gold) Line, a light rail transit (LRT) line, from its current terminus at the Atlantic Station in the

unincorporated community of East Los Angeles to the City of Whittier. It would extend the Metro L (Gold) Line approximately 3.2 to 9.0 miles, depending on the Build Alternative. The four alternatives to be evaluated include: Washington (Alternative 1), Atlantic to Commerce/Citadel Initial Operating Segment (IOS) (Alternative 2), Atlantic to Greenwood IOS (Alternative 3), and a No Build Alternative. The Los Angeles County Metropolitan Transportation Authority is the Lead Agency under the California Environmental Quality Act (CEQA).

### Response to A-4-2

Comment noted.

### Comment A-4-3

Caltrans supports transportation projects that bring all modes of transportation together to increase connectivity, expand the use of public transportation, and advance equity and livability in all communities. It is our goal to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability while maintaining the safety and integrity of the State's transportation system.

### Response to A-4-3

Comment noted.

### Comment A-4-4

After reviewing the re-circulated DEIR, Caltrans has the following comments: Caltrans does not anticipate any potential safety impacts on its facilities from the three (3) proposed build alternatives along Washington Boulevard. However, trucks hauling materials should have tarp covers to prevent debris from falling onto State facilities' on/offramps and should avoid peak hours of congestion.

### Response to A-4-4

Hauling would be carried out under California Vehicle Code Sections 23114 and 23115, which require vehicles operating on the highway to be properly loaded and covered so that no part spills, leaks, blows, sifts, or otherwise escapes the vehicle. Further, as identified in MM TRA-1 as revised in this Final EIR, construction-related travel would be scheduled during off-peak hours where feasible.

### Comment A-4-5

Also, Alternative 1 is outside Caltrans' right of way, except the crossing at the I-605 freeway. Alternatives 2 and 3 are outside of Caltrans' right of way. On Washington Boulevard at the I-605 interchange, if there is a change in geometry/configuration (e.g., reduction in the number of lanes, traffic control, etc.), a Traffic Operations Analysis Report (TOAR) including an Intersection Control Evaluation (ICE) should be prepared.

### Response to A-4-5

Project-related improvements affecting Caltrans facilities will undergo the required design reviews and evaluation reports, subject to Caltrans review and approval processes; however, it should be noted that under current CEQA requirements, regional vehicle miles traveled (VMT), rather than delay, is used as the metric for determining traffic impacts within an EIR. See also Response to Comment A-11-12.

### Comment A-4-6

Regarding Complete Streets for Alternative 1, the project should consider upgrading all existing station-adjacent intersection crosswalks to Continental style for increased visibility and pedestrian accessibility. Further considerations consist of addressing sidewalk gap closures, sidewalk widening, and ADA compliance, where needed. For the six new stations, the adjacent crosswalks should include Leading Pedestrian Intervals (LPIs) due to the lengthy intersections.

### Response to A-4-6

As stated in Section 3.14.6.1.1 of the Recirculated Draft EIR, at some locations along the alignment, sidewalks would be relocated, widened, and/or replaced with the same widths where possible to accommodate the light rail guideway, traction power substations (TPSS), stations, or other related infrastructure, but only in the immediate area adjacent to these elements; however, these would be improvements to existing conditions, as they would enhance the overall walkability and bike accessibility of the proposed station areas. Station adjacent crosswalk design will be decided during Final Design and will be consistent with Metro Rail Design Criteria (MRDC) and Metro Systemwide Station Design Standards Policy, and Metro Transfer Design Guide, taking into consideration the standards and policies of the authorities having jurisdiction. Additionally, as stated in Section 3.14.6.3.1 of the Recirculated Draft EIR, the possibility of conflicts between automobiles and pedestrians would arise if pedestrians do not use designated, signalized crosswalks to access station platforms. As identified in PM TRA-1 (page 3.14-45 and 3.14-46), best practice safety measures would be implemented to minimize potential conflicts such as mid-block crosswalks, high visibility curbs between the guideway and roadway, and warning signs to provide for safe access to station platforms.

### Comment A-4-7

Additionally, most of the planned route would run along Atlantic and Washington Boulevard, two streets that do not have bicycle facilities. A total of 50.9 existing miles of Class I-IV bicycle facilities traverse or are adjacent to the project area. To further increase multimodal safety, the project should incorporate bike signage and wayfinding to existing (or planned) facilities.

### Response to A-4-7

As described in Section 3.14.6.1 of the Recirculated Draft EIR, the Project would provide bicycle circulation and enhanced access in the immediate station areas. Improvements in the immediate station area, such as bike parking, connections to existing nearby bike facilities, and wayfinding signage, would be determined during preliminary engineering and would be consistent with the Systemwide Station Design Standards as contained in the MRDC and Architectural Standard and Directive Drawings, as required by the Metro Systemwide Station Design Standards Policy.

### Comment A-4-8

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

### Response to A-4-8

Metro will comply with Caltrans permit requirements. As identified in MM TRA-1 as revised in this Final EIR, the Traffic Management Plan prepared and implemented pursuant to MM TRA-1 will include a measure requiring Metro to schedule construction-related travel during off-peak hours where feasible. As noted in response to comment A-4-5, traffic impacts as measured by delay (e.g., level of service) are not environmental impacts subject to CEQA.

### Comment A-4-9

Finally, any work completed on or near Caltrans' right of way may require an encroachment permit. However, the final determination on this will be made by Caltrans' Office of Permits. This work would require additional review and may be subject to additional requirements to ensure current design standards and access management elements are being addressed. For more information on encroachment permits, see: https://dot.ca.gov/programs/traffic-operations/ep. If you have any questions, please feel free to contact Karen Herrera, the project coordinator, at Karen.Herrera@dot.ca.gov and refer to GTS # 07-LA- 2019-03991.

### Response to A-4-9

Metro will comply with Caltrans permit requirements.

## A-5: County of Los Angeles Department of Parks and Recreation

### Comment A-5-1

The NOA for the Recirculated Draft Environmental Impact Report for the Metro Gold Line Eastside Transit Corridor Phase 2 Project has been reviewed for potential impact on the facilities of the Los Angeles County Department of Parks and Recreation (DPR). The Project would extend the Metro Gold Line from the existing Atlantic Station in East Los Angeles to Whittier along Washington Boulevard. Impacts on Multi-Use Trails The proposed Alternative 1 may affect both the Rio Hondo River Trail and the San Gabriel River Trail operated and maintained by DPR. The EIR analysis mainly focuses on paved river bikeways operated by Los Angeles County Department of Public Works (PW). DPR's multi-use (hiking, biking and horseback riding) trails need to be taken into consideration for project planning and impact evaluation. The PW bikeway and DPR multi-use trail are separated at the Rio Hondo River intersection along Washington Boulevard (Exhibit 1) and on the San Gabriel River (Exhibit 3). Along the Rio Hondo River, the multi-use trail is on the western bank and the bikeway runs alongside the eastern side of the river (Exhibit 2). At the San Gabriel River Trail undercrossing, the bike path and multi-use trail are separated on the eastern bank side (Exhibit 3). A general overview of both rivers and trails (Exhibit 4) and a screenshot of PW's bikeway map data (Exhibit 5) are also attached. The Alternative 1 contains at grade segments at the Rio Hondo River Trail crossing and the San Gabriel River Trail crossing, which may affect trail users. Further clarification on the change in elevation of the tracks is needed.

### Response to A-5-1

Section 3.13, Public Services and Recreation, of the Recirculated Draft EIR addresses potential impacts to parks and recreational facilities, including trails. Although the Recirculated Draft EIR's discussion of trails is presented primarily in terms of bike trails, the analysis of potential impacts to bike trails also applies to multi-use trails. Notwithstanding, the following relevant discussions in the Recirculated Draft EIR have been revised to more clearly make that point and respond to the

comment. The following revisions include new text, shown in underlined italicized font (*Example*) and deleted text, shown in strikeout font (~~Example~~).

**Section 3.13.5.4 Parks and Recreational Facilities** (First paragraph and table on page 3.13-8)

**Table 3.13-5** identifies the parks and recreational facilities within one quarter mile of the Build Alternatives and **Figure 3.13.1** shows their locations. Parks and recreational facilities in closest proximity to the Project are Atlantic Avenue Park on Atlantic Boulevard, Chet Holifield Park on Greenwood Avenue, and the Rio Hondo and San Gabriel River Spreading Grounds and ~~bike~~ *multi-use (i.e., hiking, biking and horseback riding)* trails.

**Table 3.13-5. Parks and Recreational Facilities within 0.25 Miles of Build Alternatives**

| *Map ID* | *Name* | *Address* | *City* |
|---|---|---|---|
| 32 | Chet Holifield Park and Community Center | 1060 S. Greenwood Ave | Montebello |
| 33 | Woods Avenue Park | Verona St and Woods Ave | Los Angeles |
| 34 | Atlantic Avenue Park | 570 South Atlantic Blvd | Los Angeles |
| 35 | Belvedere Park Lake | 3rd St and La Verne Ave | Los Angeles |
| 36 | Rio Hondo Spreading Grounds and ~~Bike~~ *Multi-Use* Trail*s* | Not available | Pico Rivera |
| 37 | San Gabriel River Spreading Grounds and ~~Bike~~ *Multi-Use* Trail*s* | Not available | Pico Rivera |
| 38 | Whittier Greenway Trail | Not available | Whittier |

The same modifications have been made to Appendix M, Community and Neighborhood Impacts Report, on page 43.

**Section 3.13.6 Impact Evaluation**

**3.13.6.1 Impact PSR-1: Public Services**

**3.13.6.1.1 Alternative 1 Washington**

**Operational Impacts**

***Parks and Recreational Facilities*** (Third paragraph on page 3.13-11)

Operation of Alternative 1 would not result in impacts to parks. There would be no acquisitions or reduction of access to parks that could require alteration or new construction of parks and recreational facilities in order to maintain park and recreation services. No physical alterations or impacts to Atlantic Avenue Park would occur because the LRT guideway would be underground. Chet Holifield Park is proximate to the ~~aerial~~ Greenwood station. Although the proposed station would provide additional access to the park, attendance is not likely to increase since this is a neighborhood-scale park that is unlikely to attract visitors from beyond the immediate vicinity. Similarly, the use of both the Rio Hondo and San Gabriel River Spreading Ground and associated ~~bike~~ *multi-use* trails would not be affected, and trail use is not anticipated to notably increase. *The finish grade of the rail bridge crossings of the Rio Hondo and San Gabriel River would maintain or increase clearance compared to the existing conditions.*

*Therefore, no decrease in the clearance heights would occur that could restrict use of the multi-use trail crossings beneath the bridges.*

The same modifications would be made to Appendix M, Community and Neighborhood Impacts Report, on page 57.

**Construction Impacts**

***Parks and Recreational Facilities*** (Last paragraph on page 3.13-14)

Bridge replacement at the Rio Hondo and the San Gabriel River may inhibit access or require temporary closure of their respective ~~bike~~ *multi-use* trails. ~~A short, t~~Temporary re-routing of the ~~bike~~ trail around the construction area would allow it to remain open continuously. The re-routing would not require substantial physical alterations or construction and would be accomplished *primarily* with signage and ground markings. While access to the ~~bike~~ *multi-use* trails would be limited in the vicinity of the bridges while construction is occurring, access to other portions of the trail would be maintained uninterrupted during construction. As identified in PM TRA-2, identified in Section 3.14, Transportation and Traffic, Metro standard practices shall include timing closures to minimize disruptions and developing a Traffic Management Plan for construction activities for parks and recreational facilities. *Development of a Traffic Management Plan will include coordination with affected jurisdictions along the route, which would include, but not be limited to, Los Angeles County Department of Parks and Recreation.* Detours would ~~be provided to~~ provide safe access around the construction areas, and access to the ~~bike~~ *multi-use* trails and other parks and recreational facilities would remain available; there would be no need for new or physically altered parks and recreation, the construction of which could cause significant environmental impacts, in order to maintain acceptable service levels. Therefore, construction of Alternative 1 would have less than significant impacts on parks and recreational facilities.

The same modifications have been made to Appendix M, Community and Neighborhood Impacts Report, on pages 61 and 96.

**3.13.6.2Impact PSR-2: Increased Recreation**

**3.13.6.2.1 Alternative 1 Washington**

**Operational Impacts** (Last paragraph on page 3.13-20)

There is the potential for an indirect impact given that new transit stations would be constructed in areas near parks and recreational facilities which would enable transit riders to visit these facilities, such as Chet Holifield Park which is located near the Greenwood station, and the Rio Hondo and San Gabriel River Spreading Grounds and associated ~~bike~~ *multi-use* trails located in the vicinity of Norwalk station. However, as discussed in **Section 3.13.6.1.1**, local residents are the primary users of these parks and recreational facilities, and it is not anticipated that Alternative 1 would induce a substantial number of new visitors to parks and recreational facilities such that substantial deterioration would occur. Therefore, operation of Alternative 1 would have a less than significant impact from increased recreation.

The same modifications have been made to Appendix M, Community and Neighborhood Impacts Report, on page 78.

**Construction Impacts** (Third paragraph on page 3.13-21)

Construction of Alternative 1 would not require the physical acquisition, displacement, or relocation of parks or other recreational facilities. Construction activities associated with Alternative 1 could result in temporary nuisances associated with intermittent increases in noise, dust, odors, and traffic delays, which could affect the use and physical quality of adjacent parks and recreational facilities, including Chet Holifield Park, the Rio Hondo and San Gabriel River Spreading Grounds, and associated ~~bike~~ *multi-use* trails. As discussed in Section 3.2 Air Quality, Section 3.11 Noise and Vibration, and Section 3.14 Transportation, however, these impacts would be less than significant with implementation of standard control measures. Further, these impacts would not lead to increased use of parks or other recreational facilities. Construction activities would likely require intermittent sidewalk and lane closures and detours which could inhibit access to recreational facilities. The reconstruction of the Rio Hondo and San Gabriel River bridges may require temporary closure or re-routing of the ~~bike~~ multi-use trails. As identified in PM TRA-2, Metro standard practices include timing closures to minimize disruptions and developing a Traffic Management Plan for construction activities as discussed in Section 3.14, Transportation and Traffic, and Appendix N. *Development of a Traffic Management Plan will include coordination with affected jurisdictions along the route, which would include, but not be limited to, Los Angeles County Department of Parks and Recreation.* Thus, access to parks and recreational facilities would be maintained during construction. Additionally, construction of Alternative 1 would not increase use of the parks and recreational facilities through population growth as a result of construction job opportunities. Construction jobs are temporary in nature and the employment opportunities resulting from construction are not anticipated to result in population growth that would increase the use and physical deterioration of park and recreational facilities. Therefore, construction of Alternative 1 would have a less than significant impact from increased recreation.

The same modifications have been made to Appendix M, Community and Neighborhood Impacts Report, on page 79.

**Section 3.14 Transportation and Traffic**

3.14.7 Project Measures and Mitigation Measures

PM TRA-2 (first and fifth bullets on page 3.14-46)

- Cooperation with the corridor cities *and the County* shall occur throughout the construction process. Restrictions on haul routes may be incorporated into the construction specifications according to local permitting requirements.

- Safety for pedestrians, bicyclists, *multi-use trail users (i.e., hikers, bicyclists, equestrians),* and motorists shall be maintained during construction*; methods may include* ~~using~~ signage, partial lane closures, *and* construction barriers~~, and supervision by safety and security personnel at access points and throughout construction sites~~.

Additionally, the following modification has been made in the Final EIR to Section 3.14.6.1.3, page 3.14-26:

As set forth in PM TRA-2 (Section 3.14.7.1), cooperation with the corridor cities *and the County* shall occur throughout the construction process and restrictions on haul routes can be incorporated into the construction specifications according to local permitting requirements.

The following modification has been made in the Final EIR to Section 3.14.6.3.1, Section 3.14.6.3.2, Section 3.14.6.3.3, and Section 3.14.6.3.4:

> Safety for pedestrians, bicyclists, *multi-use trail users (i.e., hikers, bicyclists, equestrians)*, and motorists shall be maintained during construction*; methods may include*~~using~~ signage, partial lane closures, *and* construction barriers~~, and supervision by safety and security personnel at access points and throughout construction sites~~. The same modifications would be made to Appendix N, Transportation and Traffic Impacts Report, on pages 122, 124, 126, 128, and 139.

**Comment A-5-2**

All construction activities, specifically those which generate construction traffic, noise and/or disturbances, shall occur outside of high visitations days (weekends) and holidays. If temporary trail closure, obstruction detour, and/or restrictions are deemed necessary, Metro shall coordinate with DPR sixty (60) days prior to the onset of construction activities to allow for review and coordination of schedule for construction activities. Prior to temporary trail closure, obstructions, detour and/or restrictions, Metro shall provide DPR a complete description of construction activity, materials, equipment, method, trail re-route options and vehicles to be used, temporary signage as well as best management practices to be implemented. For trail inquiries, please contact Ms. Natasha Krakowiak, Trail Planner, at (626) 588-5813 or at nkrakowiak@parks.lacounty.gov.

**Response to A-5-2**

As concluded in Section 3.13.6 of the Recirculated Draft EIR, construction of the Project would not result in significant impacts associated with the use of parks and recreational facilities. Consistent with Metro's standard outreach efforts, Construction Relations Officers will reach out to DPR if temporary trail closure, obstruction detour, and/or restrictions are deemed necessary. The request to avoid high intensity construction activities adjacent to parks on weekends and holidays, is noted and will be implemented as feasible. Some Project construction, such as but not limited to bridge demolition and concrete pours, may require weekend closures. Such closures, however, would not result in physical impacts to the environment.

**Comment A-5-3**

Public Noticing Prior to construction or any disturbance of the trail, Metro shall notify the public at-large of the pending construction activity, if any, forty-five (45) days prior to commencing construction. The form of public outreach shall be through several mediums such as local publications and public signs within a one-mile radius of trail access points or existing trails. Notices on the trail shall begin approximately two (2) miles north and south of the construction zone in both directions with intermediate signs every one-half mile. Notice shall be sent to groups such as equestrian, mountain bike, and hiking groups in the general area. Please coordinate with our trail staff regarding re-routing of the Rio Hondo River Trail and the San Gabriel River Trail during construction. Right-of-Entry Permit Construction activities and operations occurring within Rio Hondo River Trail and San Gabriel River Trail may require a right-of-entry permit from DPR. Metro shall contact DPR ninety (90) days prior to commencing construction. For inquiries on the right-of- entry permit, please contact Ms. Diane Thome, at (626) 588-5324 or by email at dthorne@parks.lacounty.gov.

### Response to A-5-3

MM TRA-1, as discussed in Section 3.14.7 of the Recirculated Draft EIR and modified in the Final EIR, requires that the contractor prepare a Traffic Management Plan that facilitates the flow of traffic in around construction zones. This includes provisions for pedestrians, trail users, bicyclists. Signage will be implemented to inform users of the detours. Additionally, per Metro's standard practice, Metro's Construction Relations Officers will perform extensive outreach before and during construction to keep the local community informed of activities includes closures and detours. Outreach efforts include flyers, social media posts, and email communication.

Metro will coordinate with DPR on construction activities and operations occurring within the vicinity of the trails and any required permits/approvals will be obtained.

## A-6: Los Angeles County Sanitation Districts

### Comment A-6-1

The Los Angeles County Sanitation Districts (Districts) received a Notice of Availability of a Recirculated Draft Environmental Impact Report (Draft EIR) for the subject project on July 5, 2022. The proposed project is located within the jurisdictional boundaries of Districts Nos. 2 and 18. Previous comments submitted by the Districts to your agency in correspondences dated March 30, 2010, and October 22, 2014, (copies enclosed) still apply to the subject project with the following comment and updated information:

### Response to A-6-1

See Responses to Comments A-6-2 through A-6-7 to the letter dated August 29, 2022; Responses to Comments A-6-8 through A-6-15 to the letter dated March 30, 2010; and Response to Comment A-6-16 to the letter dated October 22, 2014.

### Comment A-6-2

1. Section 3.16.6 Impact Evaluation; Operational Impacts; pages 3.16-12, 3.16-16, 3.16-20, 3.16-29; 3.16- 30; 3.16-31: the Draft EIR mentioned that "...underground stations and control rooms at at-grade stations would be equipped with sump pumps/clarifiers that would drain to the sewer in the event of a flood." Please note that the Districts will not be able to accept discharge during rainfall or regional flooding. Other emergency discharges of flood water into the sewers, as a result of a burst pipe for example, are generally not allowed and should be directed to the storm drains. Some emergency discharges may be allowed on a case-by-case basis and would require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at (562) 908-4288, extension 2900, in order to reach a determination on this matter. Project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to https://www.lacsd.org/services/wastewater-programs-permits/industrial-waste-pretreatment-program/industrial-wastewater-discharge-permits.

### Response to A-6-2

Los Angeles Metro will coordinate with the Los Angeles County Sanitation Districts' Industrial Waste Section regarding the need for an Industrial Wastewater Discharge permit for discharges to

the sewer as authorized under the Sanitation Districts' Wastewater Ordinance as amended July 1, 1998. Discharges to the sewer will comply with permit requirements.

Table 2-5 of Section 2.7 of the Recirculated Draft EIR has been revised to reflect the following correction, which is shown in underlined italicized (new) text:

**Table 2-5. Required Agency/Jurisdiction Permits**

| Agency/Jurisdiction | Permits |
|---|---|
| State Water Resources Control Board | NPDES Dewatering permit, Los Angeles County MS4 NPDES Package, Industrial General Permit; Construction General Permit and SWPPP |
| Regional Water Quality Control Boards | Section 401 |
| SCAQMD | Consultation to identify best practices for construction emissions, Clean Air Act Title V permit (if required) |
| BNSF Railroad | Encroachment permits |
| UPRR | Encroachment permits |
| Los Angeles County Flood Control District | Permits |
| Los Angeles County Department of Public Works | Permits |
| *Los Angeles County Sanitation Districts* | *Permits* |
| County of Los Angeles and cities of Commerce, Montebello, Pico Rivera, Santa Fe Springs, and Whittier | Permits and/or discretionary actions required |

Key:
BNSF = Burlington Northern Santa Fe
NPDES= National Pollutant Discharge Elimination System
SWPPP = Stormwater pollution prevention plan
MS4 = Municipal Separate Storm Sewer System
SCAQMD = Southern Coast Air Quality Management District
UPRR = Union Pacific Railroad

## Comment A-6-3

2. The proposed project may impact existing and/or proposed Districts' facilities (e.g. trunk sewers, recycled waterlines, etc.) over which it will be constructed. Districts' facilities are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specification that incorporate Districts' facilities are submitted for our review. To obtain copies of as-built drawings of the Districts' facilities within the project limits, please contact the Districts' Engineering Counter at engineeringcounter@lacsd.org or (562) 908-4288, extension 1205. When project plans that incorporate our facilities have been prepared, please submit copies of the same to the Engineering Counter for our review and comment.

## Response to A-6-3

During the project design phase, Metro will coordinate with the Los Angeles County Sanitation Districts regarding design and required permitting.

## Comment A-6-4

3. The wastewater flow originating from the Maintenance and Storage Facilities (MSF's) of the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Montebello Diversion Trunk Sewer, located in South Malt Avenue,

north of Telegraph Road. The Districts' 18-inch diameter trunk sewer has a capacity of 3.8 million gallons per day (mgd) and conveyed a peak flow of 0.3 mgd when last measured in 2016.

### Response to A-6-4

Based on information provided in the comment, the affected Districts' trunk sewer appears to have available capacity. The Commerce MSF and Montebello MSF would generate sewer wastewater from employee hygiene facilities like restrooms. Based on the available conveyance and treatment capacities available in the Districts' existing facilities, sufficient capacity appears to be available. Additionally, as indicated by the LACSD in Comment A-6-4 and Comment A-6-5, and as addressed in Section 3.16 of the Recirculated Draft EIR, the addition of wastewater generated from the MSF employee restrooms would be negligible. During the project design phase, Metro will coordinate with local sanitation jurisdictions, including the Montebello Department of Public Works and the Whittier Public Works Department, and the Los Angeles County Sanitation Districts to confirm that the sewer conveyance infrastructure is capable of supporting project demands.

### Comment A-6-5

4. The wastewater generated by the MSF's of the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 243.1 mgd.

### Response to A-6-5

Based on information provided in the comment, the affected Joint Water Pollution Control Plant appears to have a substantial amount of available treatment capacity.

### Comment A-6-6

5. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the Table 1, Loadings for Each Class of Land Use link for a copy of the Districts' average wastewater generation factors.

### Response to A-6-6

As described in Sections 3.16.6.1 and 3.16.6.3 of the Recirculated Draft EIR, the stations will not have public restrooms and will not generate sewer wastewater. The Commerce MSF and Montebello MSF would generate sewer wastewater from employee hygiene facilities like restrooms. Based on the available conveyance and treatment capacities available in the Districts' existing facilities sufficient capacity appears to be available, and as indicated above in Comments A-6-4 and A-6-5, and addressed in Section 3.16, the addition of wastewater generated from the MSF employee restrooms would be negligible. During the project design phase Metro will coordinate with the Los Angeles County Sanitation Districts to confirm that the sewer conveyance infrastructure and treatment facility are capable of supporting project demands.

### Comment A-6-7

6. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the

Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908 4288, extension 2727. If an Industrial Wastewater Discharge Permit is required, connection fee charges will be determined by the Industrial Waste Section. If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsd.org

### Response to A-6-7

See response to Comment A-6-2 regarding coordination with the Los Angeles County Sanitation Districts' Industrial Waste Section on Industrial Wastewater Discharge permit requirements. During the project design phase, Metro will coordinate with the Los Angeles County Sanitation Districts regarding any other permitting requirements and connection fees.

### Comment A-6-8 (First Attachment)

This is in reply to your letter, which was received by the County Sanitation Districts of Los Angeles County (Districts) on February 8, 2010. The proposed transit corridor routes cross Districts Nos. 2, 15, and 18. We offer the following comments regarding sewerage service:

### Response to A-6-8

See Responses to Comments A-6-9 through A-6-15 below.

### Comment A-6-9

1. The Districts maintain sewerage facilities within the project area that may be affected by the proposed project. Approval to construct improvements within a Districts' sewer easement and/or over or near a Districts' sewer is required before construction may begin. For a copy of the Districts buildover procedures and requirements, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the buildover procedure, please contact Mr. Tony Wehbe at extension 2720.

### Response to A-6-9

See Response to Comment A-6-2.

### Comment A-6-10

2. The proposed project may impact existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specifications that incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Ms. Martha Tremblay of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities that will be impacted by the proposed

project. Then, when revised plans that incorporate our sewers have been prepared, please submit copies of the same for our review and comment.

### Response to A-6-10

See Response to Comment A-6-3.

### Comment A-6-11

3. The Districts own, operate and maintain only the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system for the proposed project except to state that presently no deficiencies exist in Districts' facilities that serve the project area. For information on deficiencies for a specific City's sewerage system you should contact that City's Department of Public Works and/or the Los Angeles County Department of Public Works.

### Response to A-6-11

See Response to Comment A-6-4.

### Comment A-6-12

4. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 281.1 mgd, or the Los Coyotes Water Reclamation Plant located in the City of Cerritos, which has a design capacity of 37.5 mgd and currently processes an average flow of 26.5 mgd.

### Response to A-6-12

See Response to Comment A-6-5.

### Comment A-6-13

5. In order to estimate the volume of wastewater the project will generate, a copy of the Districts' average wastewater generation factors is available online. Go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2.

### Response to A-6-13

See Response to Comment A-6-6.

### Comment A-6-14

6. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2.

For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.

### Response to A-6-14

See response to Comment A-6-2 regarding coordination with the Los Angeles County Sanitation Districts' Industrial Waste Section on Industrial Wastewater Discharge permit requirements. During the project design phase, Metro will coordinate with the Los Angeles County Sanitation Districts regarding any other permitting requirements and connection fees.

### Comment A-6-15

7. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernadino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

### Response to A-6-15

Comment noted.

### Comment A-6-16 (Second Attachment)

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on August 19, 2014. We offer the following comment:

The proposed project may impact existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specification that incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Mr. Jon Ganz of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities that will be impacted by the proposed project. Then, when revised plans that incorporate our sewers have been prepared, please submit copies of the same for our review and comment.

### Response to A-6-16

See Response to Comment A-6-3.

## A-7: City of Commerce

### Comment A-7-1

Thank you for allowing the City of Commerce to comment on Metro's Recirculated Draft Environmental Impact Report for the Gold Line Eastside Transit Corridor Phase Two Project. This Project is very significant to the region, especially for us in the City of Commerce. Below are the City of Commerce's comments on the EIR.

General Comment, as a member of the Five-City Washington Light Rail Transit Coalition, the City of Commerce is in full support of any and all efforts to see the complete development and construction of the nine-mile segment that encompasses Metro's Phase Two Project as described in the Recirculated EIR (SCH#2010011062) and discussed herein.

### Response to A-7-1

The commenter's support for the Project is noted. See Responses to Comments A-7-2 through A-7-19 below.

### Comment A-7-2

General Comment, the City of Commerce encourages Metro Staff to undertake any and all efforts to ensure all possible funding mechanisms are being explored in order to complete this project in an expeditious manner. This would include undertaking the NEPA process in order to qualify for certain federal funds.

### Response to A-7-2

A NEPA evaluation of the Project is currently underway.

### Comment A-7-3

On Page ES-7 and ES-8, it is suggested that all proposed train stations be clearly identified to include their tentative names.

### Response to A-7-3

As indicated on page ES-7 in the introduction to the description of the Build Alternatives, the information provided therein is a summary of the Build Alternatives and design options. A more detailed description of each Build Alternative and associated design options is provided in Section 2.5 of the Recirculated Draft EIR, which includes the identification of each proposed station. At this level of planning and evaluation in the EIR, each proposed station is identified/labeled in terms of its geographic location (i.e., nearby intersection, street, or other geographic reference point) and no tentative station names are currently proposed.

### Comment A-7-4

On page ES-9, please clarify when, or what event(s) will initiate the 60 to 84 month construction schedule.

### Response to A-7-4

Groundbreaking of the construction phase would be initiated after the Metro Board awards a contractor through the competitive contract procurement process. As discussed in Section 2.6.1 of

the Recirculated Draft EIR, Table 2-3 provides a summary of typical construction activities to support LRT construction, describing the activity, typical duration, description of construction activities, and equipment required. This summary is meant to be representative not all inclusive.

### Comment A-7-5

Throughout the document and when referring to the Commerce/Citadel Station, there is a statement which reads, "Parking would not be provided at this station." Clarity or additional context is requested with this statement. In other words, will the document prevent/prohibit, the City or Metro in the future from exploring alternative parking scenarios based on the deployment of light rail in the general area of the Commerce/Citadel Station?

### Response to A-7-5

Parking facilities at the Commerce/Citadel Station are not currently proposed as part of the Project addressed in the Recirculated Draft EIR. That does not, however, prevent or prohibit the city, Metro, or other entity in the future from exploring alternative parking scenarios providing that the advancement and approval of such parking undergo the required environmental review process specific to that proposal.

### Comment A-7-6

Under 2.5.5.1.5 (Page 2-36) Traction Power Substations, the City of Commerce would like to take part in any discussions and decisions regarding the placement of any power substations within the City of Commerce.

### Response to A-7-6

This comment is noted. Metro will continue to coordinate with the city of Commerce during future phases of the Project.

### Comment A-7-7

City of Commerce would like to kindly remind Metro and its contractors that any and all construction activities as described in Section 2.6.1 Construction Sequencing (Page 2-39) within the City of Commerce shall obtain any and all necessary permits from the City prior to the commencement of any work within the City.

### Response to A-7-7

As indicated in Table 2-5 of the Recirculated Draft EIR, the Project shall obtain permitting from the city of Commerce.

### Comment A-7-8

The City of Commerce respectfully requests proper notice be given to the City on any and all property acquisitions within the City of Commerce for the proposed Construction Staging Areas as identified in Section 2.6.2 or as indicated in further detail in Appendix P and Volume 2 of the Recirculated Draft EIR. This statement would include any other private property acquisitions in conjunction with the proposed Project.

### Response to A-7-8

This comment is noted. Metro will continue to coordinate with the city of Commerce during future phases of the Project.

### Comment A-7-9

In reference to Implementation Schedule 2.8 (Page 2-45), the City of Commerce would like to encourage Metro staff to explore any and all alternatives to accelerate the construction of light rail in the region. This would include exploring any and all alternatives to complete the entire segment within a foreseeable future.

### Response to A-7-9

The commenter's support for light rail is noted.

### Comment A-7-10

Paragraph three on page 3-1-10 makes reference to Smithway Street as a "not typically busy" roadway. Please note, this segment of roadway is vital to the Citadel Retail Center and surrounding businesses throughout the year, especially during the winter holiday season (ex. Black Friday Sale.) City of Commerce requests that any impacts that could limit the use of this roadway be first reviewed and discussed with the City and any business that may be impacted by construction activity along Smithway Street.

### Response to A-7-10

As stated in 3.14.6.1.1 of the Recirculated Draft EIR, construction of the Project would require temporary closures of intersections, lanes, or sidewalks, which may result in disruptions to bus service along Atlantic Boulevard, Flotilla Street, Smithway Street, and Washington Boulevard. As the Project would be constructed in segments, these temporary lane closures and turn restrictions would not affect all intersections simultaneously. Additionally, construction activities for the Project would require temporary closures and detours that would cause a reduction in capacity along affected roads, particularly along Washington Boulevard, which is an important truck route. Trucks using Washington Boulevard would be affected due to temporary closures and associated detours. At the proposed Commerce/Citadel station, industrial properties that rely on Smithway Street as their only access point for trucks would also be affected during project construction if access is unable to be maintained during construction. Prohibiting access to these properties would be considered a significant impact. Implementation of PM TRA-2, discussed in Section 3.14.7.1, would require cooperation with corridor cities, which would include Commerce, throughout the construction process. Additionally, implementation of MM TRA-1, discussed in Section 3.14.7.2 and modified in the Final EIR, would require the preparation of a Traffic Management Plan that specifies measures to minimize disruption during construction, such as developing detour routes and coordinating with local business owners, which would reduce impacts to less than significant.

### Comment A-7-11

Figure 3.4.6. Goodyear Tire and Rubber Company Warehouse image (2353 Garfield Avenue),(View east) appears to be an adjacent building, and not the former Goodyear Building.

### Response to A-7-11

The comment is correct. The title of Figure 3.4.6 on page 3.4-21 of the Recirculated Draft EIR has been revised to *Existing Rail Alignment North of Goodyear Tire and Rubber Company Warehouse at Washington Boulevard (View north)* and the text on page 3.4-21 has been revised as follows:

> The Goodyear Tire and Rubber Company Warehouse is an approximately 300,000-square-foot, one-story reinforced concrete bow truss-roofed warehouse with an attached one-story flat-roof office ell along the north (Washington Boulevard) elevation ~~(Figure 3.4.6)~~. *Figure 3.4.6 shows the existing rail alignment north of the Goodyear Tire and Rubber Company Warehouse.*

The Recirculated Draft EIR table of contents (page xxxii) has been updated to reflect the revised figure name. The same edits to the name of figure (Figure 6-15 on page 64), text (page 63), and Table of Contents (page vii) have been made to Appendix E, Cultural Resources Impacts Report.

### Comment A-7-12

As understood by City staff, Alternative Three with the Montebello MSF site option, with or without the design alternatives, would be the environmentally superior alternative as it would result in a lower number of significant and unavoidable impacts compared to Alternatives One, Two, and Three with the Commerce MSF site option, and smaller level of environmental effects when compared to the full build-out of the Alternative One with Montebello MSF site option. As an alternative mitigation measure to the possible loss of historic contributing resources to the Vail Field Industrial Addition, in anticipation of the Commerce MSF site, including the potential loss of the Pacific Metals Company Building; the City of Commerce requests that Metro explore and include the dedication of open space in the general area of the Pacific Metal Building that pays tribute to the former Vail Airfield as well as the history of the general area. This request is in addition to the interpretive material being recommended as a mitigation measure. If the mitigation measure is acknowledged, then the City of Commerce would like to take part in any consideration involving the dedication of open space as recommended herein.

### Response to A-7-12

Mitigation measure MM CUL-3 in Section 3.4.7, page 3.4-50, explains that the intended interpretive material would concentrate on the historical resource that would be lost, including its site and history, which may include discussion of the former Vail Airfield. This would result in the preservation of photographs and information about the lost resource. The commenter's suggestion for a dedication of open space would not be mitigative for the loss of the historical resource (Pacific Metals Company Building). Demolition or alteration of a historical resource to the point that it is no longer eligible for listing is a significant and unavoidable impact, and mitigation cannot reduce the impact to a less than significant level. There is no clear nexus between the removal of this resource and mitigating the impact by obligating Metro to dedicate open space to the city. MM CUL-3 ensures establishment of an interpretive program that would be provided to the city for use in educating the public on this resource and its place in local history. Because it would not preserve the resource, the dedication of an open space would not lessen the severity of this significant and unavoidable impact. However, if the open space at this site is used for the interpretive program under MM CUL-3, then inclusion of material regarding Vail Airfield may be appropriate. The long–term plan for the location of the interpretive program (physical or digital) is subject to further stakeholder agreement and will be discussed in the Cultural Resources Monitoring and Mitigation Plan–developed under MM CUL-8.

### Comment A-7-13

In addition, the plans show an aerial configuration occupying a considerable portion of the street side as the tracks head east along Washington Blvd. This may result in the bifurcation of this part of the community. Staff would like to work closely with METRO on alternatives to ensure the City is not left with a street side that is void of any pedestrian opportunities.

### Response to A-7-13

As discussed in Section 3.10.6.1.1 of the Recirculated Draft EIR, the Project along Washington Boulevard would be consistent with the land use characteristics of the existing transportation corridor. The addition of a new LRT system along Washington Boulevard would not affect vehicular, bicycle, or pedestrian access or result in property acquisitions of residential uses, and would not physically divide an established community. Regarding pedestrian opportunities, as stated in Section 3.14.6.1.1 of the Recirculated Draft EIR, at some locations along the alignment, sidewalks would be relocated, widened, and/or replaced with the same widths where possible to accommodate project-related features and infrastructure in the immediate area adjacent to these elements; these would be improvements to existing conditions as they would enhance the overall walkability and bike accessibility of the proposed station areas.

### Comment A-7-14

The Project may potentially impact property within the City, including the one at Northwest corner of Washington Blvd. and Garfield Ave. The project should consider the widening of the west side of Garfield Ave. and north side of Washington Blvd. to create additional room for bus stops and a right turn lane from Garfield south to Washington west.

### Response to A-7-14

As stated in 3.14.6.1.1 of the Recirculated Draft EIR, the Project has proposed traffic lane reconfigurations, which would result in reduction of roadway capacity. As such, re-routing and/or relocating existing bus stops may be required. As identified under Impact TRA-1 in Section 3.14.6 of the Recirculated Draft EIR, the Project would support several regional and local plans and policies and would not conflict with adopted regional or local policies or plans related to roadway circulation or transit. This will be refined further in Preliminary Engineering/Final Design. See also Response to Comment A-7-15 below regarding coordination with Metro at this intersection.

### Comment A-7-15

The City is working on adding a right turn lane from westbound Washington Blvd. to northbound Garfield at the northeast corner. The plans reviewed by staff show impacts at this intersection, the widening of this intersection and adding a right turn lane may not be possible due to the proposed work/improvements related to Eastside Project. The Eastside Phase 2 Project should consider reimbursing the City for the costs the City had spent related to the right turn evaluation (City did appraisals, survey, designs for the potential right turn lane).

### Response to A-7-15

The Project's concept design was based on existing conditions. The LRT design at that location is an aerial guideway with columns placed within the Washington Boulevard right-of-way. The city should continue to coordinate its plans for a new westbound-to-northbound right turn lane with Metro so that the aerial LRT guideway and columns can be designed to accommodate this lane

addition and eliminate any potential conflict. Consideration of cost reimbursement is beyond the scope of this Recirculated Draft EIR and the requirements of CEQA.

### Comment A-7-16

The Eastside Phase 2 Project will eliminate the third lanes (curb lanes) on both directions of Washington Blvd., starting at Garfield Ave., which will reduce the capacity of Washington Blvd. by approximately one-third. This may result in traffic being diverted to other City Streets. The Eastside Phase 2 Project should consider and provide mitigation measures to offset the impacts.

### Response to A-7-16

As stated in Section 3.14.6.1.1 of the Recirculated Draft EIR, parallel east–west routes (e.g., Telegraph Road, Olympic Boulevard, Whittier Boulevard) would continue to serve as alternatives to Washington Boulevard, providing additional connections to and from the regional freeway network. As such, changes in general-purpose travel lanes would be consistent with local and regional circulation elements and plans. Further, as explained in Section 3.14.2.2, Senate Bill (SB) 743, which was codified in Public Resources Code Section 21099, required the California Office of Planning and Research (OPR) to establish new CEQA Guidelines "for determining the significance of transportation impacts of projects within transit priority areas." The new criteria were required to move away from vehicle delay and level-of-service (LOS) and move toward more multimodal concepts "that may include, but are not limited to, VMT, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." Public Resources Code Section 21099 directed that once those guidelines were certified, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion" would no longer be considered a significant impact under CEQA.

As identified in Section 3.14.6.2 of the Recirculated Draft EIR, Alternative 1 would result in approximately 10,000 daily reduced VMT compared to the No Project Alternative, which is consistent with project objectives to provide additional mobility options, and improve accessibility and connectivity to transit-dependent communities.

As discussed above and in Section 3.14 of the Recirculated Draft EIR, no significant operational traffic impacts would occur and no mitigation is required.

### Comment A-7-17

The City is looking to realign some of the streets within the project area to provide for better mobility which would complement and mitigate the proposed Eastside Phase 2 Project. These include, but are not limited to Smithway St. being realigned, Saybrook Ave to be extended, and Tubeway St to be realigned and extended, among others. The City would like to request that Metro work with staff to discuss/explore the feasibility/options if the takes by the project can be evaluated/adjusted to assist the City with the proposed street extensions/realignments.

### Response to A-7-17

As identified under Impact TRA-1 in Section 3.14.6 of the Recirculated Draft EIR, operation of the Project would not conflict with any identified local programs, plans, or policies for circulation elements in coordination with local jurisdictions. The Project's concept design was based on existing conditions. The city should continue to coordinate its plans for street extensions/realignments with Metro to eliminate any potential conflict. Metro will continue to coordinate with the city of Commerce during future phases of the Project.

### Comment A-7-18

The project should discuss various improvements to mitigate the impacts of the project, and consider improvements, such as upgrading signals, rehabilitation of pavements, sidewalks, etc. within the impact areas, especially along Washington Blvd.

### Response to A-7-18

Improvements such as those suggested by the commenter would occur at some locations along the alignment as part of the Project. As discussed in Section 3.14, Transportation and Traffic, of the Recirculated Draft EIR, operation of the Project would not result in significant impacts and therefore, no additional street improvements or other operational mitigation is required under CEQA. As identified in project measure PM TRA-1 (Section 3.14.7.1 of the Recirculated Draft EIR), the Project would include new or modifications to existing traffic signals to accommodate light rail movements and traffic circulation patterns at intersections, enhancements to existing signalized crosswalks, and bicycle circulation and access amenities in immediate station areas. Additionally, as discussed in Section 3.14.6, at some locations along the alignment, sidewalks would be relocated, widened, and/or replaced with the same widths where possible to accommodate the light rail guideway, TPSS, stations, or other related infrastructure, but only in the immediate area adjacent to these elements; these would be improvements to existing conditions by enhancing the overall walkability and bike accessibility of the proposed station areas.

### Comment A-7-19

There are overhead Southern California Edison ("SCE") Power Poles along Washington Blvd. Discussions on the relocation, including grounding, should take place with SCE.

### Response to A-7-19

The majority of the poles along Washington Boulevard are proposed to remain in place with a few relocations on the block approaching Greenwood station. Coordination with SCE will continue, and the ultimate condition will be determined further in the design phase. Protection-in-place and relocation of utilities is addressed in Section 3.16, Utilities and Service Systems, and Appendix P, Construction, of the Recirculated Draft EIR and no significant impact is anticipated from these few relocations.

### Comment A-7-20

The City of Commerce, and its staff are available to further discuss these comments or Metro's recommendations at any moment prior to final decision, as well as moving forward.

The items discuss herein are a summary of our comments, and should not be construed as an exclusive list of corrections or comments. Please feel free to reach out to us should you have any questions regarding the enclosed information on this letter. I can be reached by phone at 323-722-4805, ext. 2389 or via email at jjimenez@ci.commerce.ca.us. Thank you. Stay Safe. Stay Healthy.

### Response to A-7-20

The city's comments are addressed in Responses to Comments A-7-1 through A-7-19 above.

## A-8: City of Pico Rivera

### Comment A-8-1

The City of Pico Rivera ("City") will be significantly affected by the proposed Metro Gold Line Eastside Transit Corridor Phase 2 Project ("Project"). The City has carefully reviewed the Gold Line Eastside Transit Corridor Phase 2 Recirculated Draft Environmental Impact Report, dated June 2022 ("Draft EIR") and offer the attached comments and questions ("City's Comments and Questions to the Draft EIR") consistent with the process expressed in Section 6.10 of the Draft EIR. On behalf of the City, we ask that the City's Comments and Questions to the Draft EIR be addressed and analyzed. The City's Comments and Questions to the Draft EIR are the City's initial comments and the City reserves the right to present additional comments and/or questions as the scope of this Project develops. Thank you in advance for Metro's review and evaluation of the City's response to the Draft EIR. The City of Pico Rivera will remain interested and engaged in the process of the Project and the impact it will create upon the residents and businesses of our City. If you have any questions concerning the City's Comments and Questions to the Draft EIR, please feel free to contact my office.

### Response to A-8-1

See Responses to Comment A-8-2 through Comment A-8-24, which address the specific comments and questions contained in the city's comment letter.

### Comment A-8-2

ES-6 ES.3 Alternatives Considered/Project Description

To be more cost effective, what actions can Metro take to re-evaluate extending the line without relocating or reconfiguring the existing Atlantic/Pomona station, currently operates as intended? Why is relocating and reconfiguring the Atlantic/Pomona station deemed necessary for this project?

### Response to A-8-2

Various factors have led to the proposed alignment, and the feasibility of maintaining the existing Atlantic/Pomona station was studied; however, the current station location/position cannot accommodate the proposed alignment's horizontal/vertical geometric requirements. Therefore, relocation/reconfiguration of the existing station is required so that the proposed extension can be implemented. See Appendix T, Alternatives Withdrawn from Further Evaluation, in the Recirculated Draft EIR, for information on the evaluation and screening of concepts, engineering and environmental refinements, and decisions to withdraw alternatives from consideration, which has a long history in the development of the Project.

### Comment A-8-3

Considering the cost, it appears this project betterment comes at the expense of extending the line all the way to Whittier in a timely manner.

### Response to A-8-3

The relocation/reconfiguration of the existing Atlantic Station is necessary for the project design and is not a "betterment." As described in Response to Comment A-8-2, the horizontal/vertical geometric requirements for the extension are not accommodated with the current station

location/position. Therefore, the relocation/reconfiguration is necessary for implementation of any of the three alternatives and cannot be eliminated to reduce project schedule or costs. See drawings T-W-131 and T-W-132 of Volume 2, Advanced Conceptual Design, of the Recirculated Draft EIR.

### Comment A-8-4

ES-7 ES.3.1 Build Alternatives

Altnernatives 2 and 3 reference IOS. Does this imply that these build altneratives will not extend beyond the determined end-point? OR is this an attempt to introduce a phasing strategy? If so, can you please describe the subsequent phases with more detail?

### Response to A-8-4

As indicated in Section 2.5 of the Recirculated Draft EIR, two initial operating segments (IOS), Alternatives 2 and 3, are evaluated as individual Build Alternatives and would function as stand-alone projects. However, if one of those IOS is the Project approved by the Metro Board of Directors, the full length of Alternative 1 may still be constructed and operated sometime in the future, contingent on future funding sources being identified and secured and compliance with CEQA.

### Comment A-8-5

Please provide timeframes, segment lengths, and constraints associated with each of the subsequent phases.

### Response to A-8-5

See Response to Comment A-8-4. As stated in Response to Comment A-8-4, if an IOS (Alternative 2 or Alternative 3) is selected for implementation, the feasibility and timing of constructing the full length of Alternative 1 would be contingent on future funding sources. As such, no future phasing or timing has yet been identified.

### Comment A-8-6

ES-13 Table ES-2 Summary of Impacts by Environmental Resource

Considering the distance of travel and number of stations, it appears that Alternative 1 - Montebello MSF has the least amount of impacts and is therefore most beneficial from an enviornmental standpoint. How did Alternative 3 elevate as the most superior when the benefits are nowhere near as significant?

### Response to A-8-6

The city's opinion that Alternative 1 should be identified as the environmentally superior alternative is noted. As stated in Section 5.7 of the Recirculated Draft EIR, Section 15126.6(a) of the CEQA Guidelines requires that an "environmentally superior alternative" is identified in order to determine which alternative possesses an overall environmental advantage when compared to all other alternatives evaluated. As described in Section 5.7, based on the comparison of environmental analysis, on balance, Alternative 3 with the Montebello MSF site option, with or without the design alternatives, would be the environmentally superior alternative as it would result in a lower number of significant and unavoidable impacts compared to Alternatives 1, 2, and

3 with the Commerce MSF site option, and smaller level of environmental effects compared to the full build-out of Alternative 1 with Montebello MSF site option.

### Comment A-8-7

ES-37 ES.5.1 Environmentally Superior Alternantive

The environmental analysis summary indicates that both Alternative 1 and 3 are equivilent. However, per the technical analysis on greenhouse gas reductions and vehicle miles traveled, Alternative 1 offers much greater environmental benefit.

### Response to A-8-7

See Response to Comment A-8-6 regarding the selection of the environmentally superior alternative.

### Comment A-8-8

3.4-25 3.4.5.9 Dal Rae Restaurant

Considering that Alternative 1 will introduce a visual impact to a site that is eligible for historic preserveration, how will Metro support that establishment or the local city to preserve its historical sigifnicance?

3.4-25 3.4.5.10 Atchison, Topeka & Santa Fe Railway Depot (PR Museum)

Considering that Alternative 1 will introduce a visual impact to a site that is eligible for historic preserveration, how will Metro support that establishment or the local city to preserve its historical sigifnicance?

3.4-26 3.4.5.11 Cliff May Ranch House 6751 Lindsey Avenue

Considering that Alternative 1 will introduce a visual impact to a site that is eligible for historic preserveration, how will Metro support that establishment or the local city to preserve its historical sigifnicance?

3.4.35 3.4.6.1.1 Alt 1. Construction Impacts – Dal Rae

According to the DEIR, a sliver of property is required to reconfigure the existing curb, sidewalk, and landscaping along Washington Blvd. Construction will not alter the character-defining sign of Dal Rae but may disturb the feature. Impacts must be avoided to prevent damaging the sign.

### Response to A-8-8

As discussed in Section 3.4.5.10 and 3.4.5.11 of the Recirculated Draft EIR, the former Atchison, Topeka & Santa Fe Railway Depot and the Cliff May-Designed Ranch House at 6751 Lindsey Avenue are historical resources for the purposes of CEQA. Further, as explained in Section 3.4.6.1.1, page 3.4.-36, the new at-grade alignment would introduce new visual, audible, and atmospheric elements within the immediate surroundings of the former Atchison, Topeka & Santa Fe Railway Depot and the Cliff May-Designed Ranch House, but the alteration of the setting would not materially impair the significance of these historical resources. Therefore, the historical significance would not be impacted by the Project.

As explained in Section 3.4.7, the mitigation measure to address the protection and avoidance of the Dal Rae Restaurant Sign is MM CUL-4 located on page 3.4-51 of the Recirculated Draft EIR. MM CUL-4 requires the contractor to conduct a pre-construction baseline survey, implement building protection measures (e.g., fencing or sensitive construction techniques based on final project design), and conduct a post-construction survey of the Dal Rae Restaurant Sign to ensure that the integrity of the sign is not compromised.

### Comment A-8-9

3.5-17 3.5.6.1.1 Alt 1. Operational Impacts – Regional Traffic

Per the DEIR, Alterntive 1 will result in 3.2 million VMT reduction, which is equalt to an annual reduction of 89,000 gallons of gas and 4,000 gal of diesel, resulting in 11.3 billion BTUs of energy saved. Alt. 1 reduces 2.2 billion BTUs more energy that Alt. 3. Why is Alternative 3 determined to be more superior when Alerternative 1 clearly provides much greater benefit.

3.5-28 3.5.6.1.3 Alt 3. Operational Impacts – Regional Traffic

2.5 million VMT reduction = annual reduction of 71,000 gal of gas & 3,000 gal of diesel = 9.1 billion BTUs of energy saved.

### Response to A-8-9

See Response to Comment A-8-6. As described therein, the selection of the Environmentally Superior Alternative is based on the significant adverse environmental effects that each of the alternatives would have, not potential benefits.

### Comment A-8-10

3.7-18 3.7.6.1.1 Alt 1. Op. Impacts – Total Op Emissions

Alternative 1 would reduce regional VMT by 3,180,000 miles per year and GHG by 300 metric tons of CO2e per year plus an additional VMT/GHG reductions with future transit connections and improvements. Alternative 1 is superior to Alternative 3 in reducing VMT & GHG. 3.7-34 3.7.6.1.3 Alt 3. Operational Impacts – Regional Traffic Alt 2 will reduce regional VMT by 2,544,00 miles/yr and GHG by 299 metric tons CO2e/yr

### Response to A-8-10

The comment summarizes the Alternative 1 and Alternative 3 operational reductions to VMT and GHG emissions accurately. However, temporary construction related greenhouse (GHG) emissions presented in Tables 3.7-12 and 3.7-29 of the Recirculated Draft EIR would be greater under Alternative 1 than under Alternatives 3. As indicated on Pages 3.7-19 and 3.7-34 of the Recirculated Draft EIR, when also considering amortized construction related GHG emissions, total annual GHG emissions reductions would be greater under Alternative 3 than under Alternative 1.

### Comment A-8-11

3.10-17 3.10.6.2 Impacts LUP-2 – Plan Policy, or Regulation Conflicts – Alt 1

Alternative 1 helps to advance the 2014 Pico Rivera General Plan by satisfying Environmental Resource Policy 8.3-1, Circulation Policy 5.1-5, Healthy Community Goal 10.2-3, Section 3.2 – Air

Quality, Section 3.7 – GHG. Alternative 2 or 3 do not assist Pico Rivera to acheive these goals, and are therefore not superior.

### Response to A-8-11

See Response to Comment A-8-6 regarding the selection of the Environmentally Superior Alternative. As described therein, the selection of the Environmentally Superior Alternative is based on the significant environmental effects that each of the Build Alternatives would have, not potential benefits. As described in Section 7.2.2.1 and 7.2.3.1 in Appendix K, while Alternative 2 and Alternative 3 would not directly support the goals of the plans located further east of the Project terminus, Alternative 2 or Alternative 3 would provide more convenient access to transit for those communities and would not prevent a future rail extension to serve those areas. Similarly, the operation of Alternative 2 or Alternative 3 would help to implement plans, policies, and regulations encouraging circulation improvements, community access and development, and air pollutant emissions and GHG reductions in East Los Angeles. Therefore, while the commenter is correct that Alternative 2 and Alternative 3 would help to implement Pico Rivera General Plan polices to a lesser degree than Alternative 1, there would be no conflict with the plan and thus, all three Build Alternatives (Alternative 1, Alternative 2 and Alternative 3) would not result in a significant land use impact.

### Comment A-8-12

3.12-8 3.12.6.1.1 Unplanned Pop Growth

EIR states that Alternative 1 "would not induce unplanned population growth or dramatically stimulate development;" EIR does not mention or account for the current, ongoing transit-oriented development planning around the Rosemead Bl. Station, which will definitely have an impact on population growth via mixed use development, with an emphasis on affordable housing near the station. The EIR mischaracterizes ongoing efforts to plan population growth around the station area.

### Response to A-8-12

The comment incorrectly states the EIR does not mention or account for current, on-going transit-oriented development around the Rosemead Boulevard Station. As discussed in Section 3.12.6.1.1 of the Recirculated Draft EIR, implementation of Alternative 1 could indirectly affect growth and development in the detailed study area (DSA) by providing enhanced transit connections that could make station areas more desirable locations for residences and businesses and could encourage growth and economic development in the surrounding communities. There are state and regional planning programs and policies to encourage and incentivize development near transit stations. For example, the County of Los Angeles identifies Transit Oriented Districts where specific development standards can be established to encourage in-fill development, pedestrian-friendly, and community-serving uses near transit stops. Metro also supports local jurisdictions in developing and adopting transit-supportive policies and programs to leverage the value of transit investments and increase ridership. The Project would expand transit service in the region which would allow for increased development around station areas consistent with local policies and zoning requirements and restrictions.

### Comment A-8-13

3.13-8 3.13.6.1.1 Alt. 1 Fire & Police Protection

Alternative 1 would potentially increase fire and police response times but remain acceptable with coordination and design practices. Delays would be minor due to small trainsets and the short time period to enter and exit an at-grade crossing. Trains can clear signaled and unsignaled intersections quickly allowing emergency vehicles to pass. Alternative 1 will comply with National Fire Protection Assciation 130 Standard for fixed guideway Transit and Passenger Rail Systems and Metro's Fire/Life Safety Criteria. Considering the depth of quantitative data that Metro has collected during it's existance and througout the countywide transit system, the EIR does not provide and/or evaluate any before-and-after data, rates, statistics, averages on the potential increase of incidents. Metro can and should utilize existing data to extrapolate incident rates that would be comparable and correlate with the new proposed stations for Alternative 1.

3.13-9 3.13.6.1.1 Alt. 1 Fire & Police Protection

Alternative 1 may increase demand for fire/police due to incidents and emergencies resulting from stations, facilities, and grade crosings. Fare evasion, assualt/robbery can occur at stations. Metro shall provide police from the Transit Services Bureau to suppliment law enforcement efforts. Metro is also launching a 3-yr pilot Transit Amabassador Program to observe and report incidents/emergencies. Metro should provide quantitative analsysis and data regarding the total, average, and rates of incidents in light rail corridors to fully understand the potential impacts to to fire/police response. Furthermore, the DEIR does not provide insight on the increase services hours from fire/police. Will Metro be responsible for increase service hours resulting from incidents on or near the light rail facilities? How will Metro compensate local jurisdictions for budgetary impacts resulting from increase in fire/police services?

## Response to A-8-13

The commenter suggests that additional quantitative analyses be included related to LRT incidents extrapolation to understand potential impacts to emergency response. CEQA does not require quantitative impact analyses related to vehicular or pedestrian incidents occurring along light rail corridors. Fire and police protection facilities and services were qualitatively assessed to determine the potential for the Project to result in the need for such facilities to make physical alterations to maintain levels of service that could result in environmental impacts. As discussed in Section 3.13.6, Public Services and Recreation, of the Recirculated Draft EIR, the Project would implement standard coordination and design practices to maintain response times at acceptable levels. The analyses related to the increase in services hours and associated costs to attend to incidents on or near LRT facilities are beyond the scope of this Recirculated Draft EIR and the requirements of CEQA.

## Comment A-8-14

Impacts to Local and Regional Truck Routes and Commerce

The DEIR did not include analysis that evaluates the project impacts to regional truck routes and commerce, especially on Washington Bl., which the local warehouse, industrial and commercial areas of the local economy rely on. How does the loss of truck lanes, lane width reductions, and reduced turn-radii impact local and regional commerce? Metro should conduct an economic impact assessment and an cost/benefit analysis. Provide a complete operational analysis of the proposal to change Washington Boulevard from 6 through lanes to 4 through lanes, including traffic levels of service and delays associated with both scenarios. Address all modes of transportation in this analysis.

## Response to A-8-14

The potential impacts of the Project on transportation and traffic are analyzed in Section 3.14.6 of the Recirculated Draft EIR. Regarding congestion, CEQA and the CEQA Guidelines no longer require a level of service analysis to determine significant impacts. See Response to Comment A-7-16 for additional information.

As stated in Section 3.14.6.1.1 of the Recirculated Draft EIR, Alternative 1 would result in a reduction in general-purpose travel lanes from three lanes to two lanes. Reductions in lane width would be within roadway standards and would not result in restricting truck movements. Likewise, turning radii for trucks has been evaluated and would be maintained. There would be some elimination of ingress/egress movements at driveways and selected cross streets from the median of Washington Boulevard, which could require some changes to truck ingress/egress for industrial properties in Commerce and Montebello. Approach and departure routes for trucks, for example, might need to change slightly to accommodate new turn restrictions at selected locations. However, the Project would not preclude vehicle or truck access along Washington Boulevard, and left-turn movements would continue to be allowed to and from major cross-streets (e.g., Garfield Avenue, Greenwood Avenue) at signalized intersections as identified in PM TRA-1 (Section 3.14.7.1). In addition, parallel east–west routes (e.g., Telegraph Road, Olympic Boulevard, Whittier Boulevard) would continue to serve as alternatives to Washington Boulevard, providing additional connections to and from the regional freeway network. The changes in general-purpose travel lanes would be consistent with local and regional circulation elements and plans and as addressed in Section 3.14, operation would result in less than significant impacts related to traffic circulation, including truck movements. Further, the Project would result in a reduction in VMT and provide additional mobility options and improve accessibility and connectivity to transit-dependent communities. As such, operation of the Project is not expected to lead to a substantial or measurable increase in vehicle travel.

CEQA does not require an economic impact assessment or a cost/benefit analysis. Pursuant to CEQA, the purpose of the Recirculated Draft EIR is to evaluate potential impacts of a project and project alternatives on the physical environment; unless the funding or costs cause such an impact, they are outside the scope of the Recirculated Draft EIR.

## Comment A-8-15

Cost Overruns – Rebuilding Atlantic/Pomona Station

The project cost estimates are skyrocketing due to the significant cost drivers such as the relocation/reconfiguration of the Atlantic/Pomona station, tunnel, maintenance yard, and bridges.

Metro should consider maintaining the existing the Atlantic/Pomona Station as-is and begin tunneling once the LRT is on Atlantic Blvd.

## Response to A-8-15

See Response to Comment A-8-2. The horizontal/vertical geometric requirements are not accommodated with the current station location/position and therefore, relocation of the existing station is required.

### Comment A-8-16

The cost overruns will impact the project's ability to reach the proposed terminus in the City of Whittier in a timely manner. What are the impacts to the project timeline if the underground Atlantic/Pomona Station was completed as the final phase of the project?

### Response to A-8-16

Deferring the Atlantic/Pomona station would have no effect or benefit. The cost estimate and schedule assume completion to the Project's terminus. As described in Section 2.6.1 of Chapter 2 (Project Description), construction along various portions of the alignment could occur simultaneously. The precise construction phasing has not yet been determined.

### Comment A-8-17

The uincorporated community of East LA has 4 existing LRT stations plus 1 new proposed station for a population of 120,000 people. That is equal to one station for every 24,000 people. Pico Rivera is proposed to have 1 station for its population of 64,000. How does Metro plan to rectify the inequitable use of funding to rebuild a fully functioning station at the expense of communities that do not have high quality transit?

### Response to A-8-17

As described in Response to Comment A-8-2, relocation/reconfiguration of the existing Atlantic Station is required because the horizontal/vertical geometric requirements to extend the alignment are not accommodated with the current station location/position (see Volume 2 of the Recirculated Draft EIR). Therefore, the relocation of the existing station is necessary to construct the expansion that will extend further into eastern Los Angeles County and thereby bring transit to those communities.

### Comment A-8-18

If cost and construction impacts are a major influence on extending the light rail line to Whittier in a timely manner, Metro should explore maintaining the existing Atlantic/Pomona station as-is or consider eliminating the station all together.

### Response to A-8-18

See Response to Comment A-8-2. The horizontal/vertical geometric requirements are not accommodated with the current station location/position, and therefore, relocation of the existing station is required.

### Comment A-8-19

Homelessness Support

What resources and/or support will Metro provide to address homelessness on its facilities?

### Response to A-8-19

The potential for the Project to attract people experiencing homelessness is beyond the scope of CEQA to address. Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment.

For its transit system, Metro works with the Los Angeles County Department of Mental Health (DMH) and the Los Angeles Homeless Services Authority (LAHSA) to respond to homelessness by working with people experiencing homelessness and connecting them to resources and services. Metro convenes a homeless task force comprised of various partners such as agency staff, DMH, LAHSA and others to discuss and address homelessness throughout its transit system. As of 2022, Metro is updating a strategic plan to develop a coordinated and comprehensive approach that maintains a safe and clean environment for patrons, while connecting individuals experiencing homelessness to services and resources.

Metro's Board and Chief Executive Officer have prioritized addressing homelessness on transit through a holistic approach that focuses on human-centered, trauma-informed care. Metro outreach workers serve Metro riders daily through outreach and engagement. They are specially trained staff who directly address the needs of Metro riders by offering connections to services and housing. The outreach teams provide resources, including addiction, mental health, and social services, at many rail and bus stations and will expand that work for any new Metro transit services in operation.

The Project would integrate measures to maximize safety and security for all passengers. As identified in Section 3.13.6.1, Public Services and Recreation, of the Recirculated Draft EIR, security issues, such as fare evasion, assault or robbery, could potentially occur at stations. Per Section 3.13.6.1 of the Recirculated Draft EIR and as identified in project measure PM PSR-1, Metro shall supplement existing police protection services by providing Transit Services Bureau officers and contracted police services at all new LRT facilities, as needed to ensure that adequate police protection services are provided.

Metro implements security features on its bus and rail system, including closed-circuit television (CCTV) cameras, emergency call boxes, fully lighted station stops, and bicycle parking. These features, which are on trains and buses or at the rail stations and associated transit parking, are designed to offer security and a sense of personal well-being for patrons and passengers.

Safety and security at project stations will be consistent with the approaches used throughout the Metro system. The Project will be designed to include security features such as lighting, surveillance, CCTV, access control, and emergency call boxes to reduce the potential for crime. In addition, stations will be consistent with Metro's Systemwide Station Design Standards, which includes guidance on safety and security elements.

In addition, Metro will conduct a Threat and Vulnerability Assessment (TVA) as design advances. The TVA will follow Federal Transit Administration guidelines and Metro protocols or equivalent, such as the Metro Rail Design Criteria and Metro Fire/Life Design Criteria. The TVA process will give a more refined and detailed analysis of the security environment; identify potential domestic and international security threats, and potential vulnerabilities and shortcomings in the transit system; and make recommendations to reduce identified vulnerabilities to acceptable levels. The TVA analysis of crime prevention and security issues will focus on the potential for violent crimes, property theft, fare evasion, vandalism, quality of life offenses (e.g., disorderly conduct, littering, excessive noise, and loitering), and terrorist attacks.

Further, beginning in October 2022, subsequent to the release of the Recirculated Draft EIR, Metro began deploying trained contract personnel on Metro's buses, bus stops, trains, and stations to provide customer support. Ambassadors are unarmed and travel the system or are present at stations to promote safety for riders and operators. While not acting as security officers or replacing security officers, they provide a visible presence and support riders by connecting them

with resources they may need such as providing directions or connecting them to other agencies and services as appropriate or warranted. They also help Metro to respond to issues more quickly by reporting maintenance, cleanliness, or safety concerns directly to the appropriate Metro department. Section 3.13, Public Services and Recreation, and Appendix M, Community and Neighborhoods Impacts Report, of the Recirculated Draft EIR have been revised to reflect that the Ambassador program has commenced.

**Comment A-8-20**

Traffic Light Synchronization

What agency will be responsible for providing LRT priority light syncronization to minimize traffic impacts and to maximize LRT travel times within the corridor? How will this impact perpindicular roadway traffic, signals and intersections that cross Washington Blvd?

Property Acquisitions & Dispensation

Metro is proposing to acquire land surrounding the station near the intersection of Rosemead Boulevard and Washington Boulevard for purpose of construction staging. Upon completion of the project, the City of Pico Rivea would like to explore the dispensation of those lands to the local jurisdiction for the purpose of mixed-use transit oriented community defvelopment with maximum local control.

**Response to A-8-20**

As addressed in Section 3.14.6 of the Recirculated Draft EIR, new traffic signals or modifications to existing traffic signals (e.g., signal phasing changes) to minimize, not maximize LRT travel times; accommodate light rail movements, traffic circulation patterns at intersections, and grade crossings; and to facilitate pedestrian access to/from stations (e.g., mid-block crossings at stations) would be required. As identified in PM TRA-1 in Section 3.14.7.1 of the Recirculated Draft EIR, these changes would be designed according to applicable Metro Rail Design Criteria (MRDC) and standards and would provide for adequate emergency access and would not result in a substantial or measurable increase in VMT. Signal synchronization would be designed and coordinated with the authority having jurisdictions. Regarding reuse of construction staging areas, as noted in Section 3.10, Land Use, of the Recirculated Draft EIR, upon completion of the construction activities, properties acquired for construction activities may be available for joint development or parking facilities subject to standard planning and permitting review processes separate from this environmental review process.

**Comment A-8-21**

Business Impacts & Local Tax Base

According to a 2017 study from Columbia University and published in the Journal of Transportation and Land Use, "station construction appears to increase the risk of business failure by 46% for businesses within 400 meters of a station." The study goes on to suggest that loan and technical assistance programs for businesses affected by construction should become standard practice to support businesses in retooling to meet new demand in addition to mitigating construction nuisance. Businesses at the Pico Rivera Towne Center have generated an average of $1.7 million in sales tax annually over the past 10 years. Most recently, Pico Rivera Towne Center businesses generated $2.2 million in sales tax revenue. Station construction will negatively impact these vital City revenues for a prolonged period of time. Construction for Alternative 1 will

significantly hinder local business productivity and impact the local tax revenues received from business along the Washington Blvd. corridor. How will Metro support local businesses subject to construction impacts? How will Metro compensate local jurisdictions for the decline and/or loss of tax revenues?

Business Closures

According to a 2011 technical report from the U.S. Department of Transportation's Federal Transit Administration, light rail projects present the following impacts, which may result in loss of business revenue along Washington Boulevard: pedestrian access, traffic and vehicular access, temporary parking loss, utility shutoffs, noise and vibration, increased dirt and dust, and visual impacts. If businesses, especially small long-standing businesses are unable to endure the construction impacts and ultimately have to close, how will Metro make up for this type of cultural and economic loss? Will these local businesses receive some form of restitution, compensation, and/or relocation assistance?

**Response to A-8-21**

The potential for the Project to create economic hardship for small businesses is largely beyond the scope of CEQA to address. Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment. As a result, the Recirculated Draft EIR does not consider economic impacts as environmental impacts. The indirect environmental effects of the Project's social and economic impacts are assessed, as applicable, in the individual resource sections of the Recirculated Draft EIR (Section 3.1 through Section 3.17).

Metro values local business and is committed to reducing potential negative effects of the Project. As required by law, Metro would comply with the provisions of the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act) (if federal funding is used for the Project) and the California Relocation Act. The Uniform Act mandates that certain relocation services and payments be made available to eligible residents, businesses, and nonprofit organizations displaced as a direct result of projects undertaken by a federal agency or with federal financial assistance (Note: Although Metro is under consideration of pursuing federal funds for the Project, Metro would comply with Uniform Act provisions). The Uniform Act provides for uniform and equitable treatment for persons displaced from their homes or businesses and establishes uniform and equitable land acquisition policies. Relocation assistance and benefits would be provided to displaced businesses in compliance with state regulations and Metro's policies. However, economic impacts could occur to other businesses that depend on the revenue generated by transactions with businesses that would be displaced by the Project. Under the regulations of the Uniform Act, since the businesses that experience those economic impacts would not be displaced by the Project, they would not be eligible for financial assistance under the Uniform Act.

Additionally, since 2014, Metro has launched pilot programs that provide financial assistance to small businesses located along rail corridors under construction. When Metro's staff presents the Project to the Metro Board of Directors for approval, it is anticipated that the Metro Board will approve programs similar to what has been previously approved for other Metro projects. These programs include a Metro Business Interruption Fund, a Metro Business Solution Center, and Metro's Eat Shop Play Local business mitigation program meant to bring focused attention to local businesses affected by Metro construction, would be implemented. Additionally, Metro's Construction Relations Officers will work with local businesses to provide signage and marketing

assistance, such as providing “Open During Construction,” wayfinding, and promotional signage for businesses.

### Comment A-8-22

Local cities such as Pico Rivera are involved in reviewing project plans, documents, and designs, and support efforts related to community outreach and engagement. How will Metro compensate and/or reimburse local jurisdictions for project reviews and participation?

### Response to A-8-22

Metro appreciates local cities’ involvement in all aspects of the Project planning and design, including participation in the CEQA process. Metro will continue to work with the city of Pico Rivera consistent with a cooperative agreement.

### Comment A-8-23

The development of safe, multimodal access to public transportation networks is critical to the @moosuccess of this project. This also includes first/Last mile planning that relates to street and sidewalk infastructure for vulnerable road users such as pedestrians, bicyclists, peopel with disabilities, and other users. Multimodal access needs to consider and accommodate the many ways public transportation users get to and from a public transporation stop or access it. For example, the inclusion of a complete streets concept is crucial. With this concept, it is critical that the infrascture around the lightrail is built to support multimodal access - including crosswalks, bike lanes, bike parking, benches, wayfinding, etc.

### Response to A-8-23

As explained in Section 3.14.6.1 of the Recirculated Draft EIR, the Project would provide bicycle circulation and enhanced access in the immediate station areas, such as bike parking and connections to existing nearby bike facilities within up to a 600-foot radius for improved bicycle-to-transit connections, which would be determined during preliminary engineering. At some locations along the alignment, sidewalks would be relocated, widened, and/or replaced with the same widths where possible to accommodate the light rail guideway, TPSS, stations, or other related infrastructure, but only in the immediate area adjacent to these elements; however, these would be improvements to existing conditions by enhancing the overall walkability and bike accessibility of the proposed station areas. Sidewalks would not be altered to the extent that pedestrian circulation would be impaired or in violation of ADA standards as identified in PM TRA-1 (see pages 3.14-45 and 3.14-46). As discussed in Section 3.3.1 of Appendix N of the Recirculated Draft EIR, Metro’s first/last mile policies describe a process and set of roles whereby Metro initiates station access improvements through planning stages and provides various incentives and assistance for local agencies to deliver planned improvements. First/last mile efforts focus on streetscape elements that improve access, safety, and user experience for people on foot, bike, or other rolling modes as the predominant means that riders use to access the Metro systems. Pursuant to the Metro First/Last Mile Guidelines, cities are responsible for advancing the design, environmental clearance (if needed), construction, and maintenance of first/Last mile (FLM) connections.

### Comment A-8-24

Advocate for creation of a "buffer zone" that serves as noise attenuation betweent the track and any vibration sensitive receivers adjacent to the single-family residences (and TELACU residential development) along Washington Boulevard. The stretch from Washington Blvd at Rosemead

through Washington Boulevard at Pico Vista Rd. is the only stretch in the entire proposed extension that passes directly accross residences. Noise attenuation levels need to be assessed specifically for residential areas (vs. commercial, industrial, etc.)

### Response to A-8-24

As identified in Section 3.11, Noise and Vibration, of the Recirculated Draft EIR which assesses noise and vibration impacts on residences and other properties, noise impacts are less than significant and noise attenuation is not required. The location of the alignment along the Washington Boulevard median already maximizes the buffer distance to the residences on each side. See Table 3.11-9 on page 3.11-16 of the Recirculated Draft EIR that identifies existing and Project noise levels at noise monitoring locations along the alignment, including at single-family residences along Washington Boulevard. See also Attachment A of Appendix L which shows the location of the receptors along the alignment.

## A-9: City of Commerce

### Comment A-9-1

Thank you for allowing the City of Commerce to comment on Metro's Recirculated Draft Environmental Impact Report for the Gold Line Eastside Transit Corridor Phase Two Project. This Project is very significant to the region, especially for us in the City of Commerce. Below are the City of Commerce's comments on the EIR.

- General Comment, as a member of the Five-City Washington Light Rail Transit Coalition, the City of Commerce is in full support of any and all efforts to see the complete development and construction of the nine-mile segment that encompasses Metro's Phase Two Project as described in the Recirculated EIR (SCH#2010011062) and discussed herein.

- General Comment, the City of Commerce encourages Metro Staff to undertake any and all efforts to ensure all possible funding mechanisms are being explored in order to complete this project in an expeditious manner. This would include undertaking the NEPA process in order to qualify for certain federal funds.

- On Page ES-7 and ES-8, it is suggested that all proposed train stations be clearly identified to include their tentative names.

- On page ES-9, please clarify when, or what event(s) will initiate the 60 to 84 month construction schedule. Throughout the document and when referring to the Commerce/Citadel Station, there is a statement which reads, "Parking would not be provided at this station." Clarity or additional context is requested with this statement. In other words, will the document prevent/prohibit, the City or Metro in the future from exploring alternative parking scenarios based on the deployment of light rail in the general area of the Commerce/Citadel Station?

- Under 2.5.5.1.5 (Page 2-36) Traction Power Substations, the City of Commerce would like to take part in any discussions and decisions regarding the placement of any power substations within the City of Commerce. • City of Commerce would like to kindly remind Metro and its contractors that any and all construction activities as described in Section 2.6.1 Construction Sequencing (Page 2-39) within the City of Commerce shall obtain any and all necessary permits from the City prior to the commencement of any work within the City.

- The City of Commerce respectfully requests proper notice be given to the City on any and all property acquisitions within the City of Commerce for the proposed Construction Staging Areas as identified in Section 2.6.2 or as indicated in further detail in Appendix P and Volume 2 of the Recirculated Draft EIR. This statement would include any other private property acquisitions in conjunction with the proposed Project.

- In reference to Implementation Schedule 2.8 (Page 2-45), the City of Commerce would like to encourage Metro staff to explore any and all alternatives to accelerate the construction of light rail in the region. This would include exploring any and all alternatives to complete the entire segment within a foreseeable future.

- Paragraph three on page 3"10 makes reference to Smithway Street as a "not typically busy" roadway. Please note, this segment of roadway is vital to the Citadel Retail Center and surrounding businesses throughout the year, especially during the winter holiday season (ex. Black Friday Sale.) City of Commerce requests that any impacts that could limit the use of this roadway be first reviewed and discussed with the City and any business that may be impacted by construction activity along Smithway Street.

- Figure 3.4.6. Goodyear Tire and Rubber Company Warehouse image (2353 Garfield Avenue),(View east) appears to be an adjacent building, and not the former Goodyear Building.

- As understood by City staff, Alternative Three with the Montebello MSF site option, with or without the design alternatives, would be the environmentally superior alternative as it would result in a lower number of significant and unavoidable impacts compared to Alternatives One, Two, and Three with the Commerce MSF site option, and smaller level of environmental effects when compared to the full build-out of the Alternative One with Montebello MSF site option. As an alternative mitigation measure to the possible loss of historic contributing resources to the Vail Field Industrial Addition, in anticipation of the Commerce MSF site, including the potential loss of the Pacific Metals Company Building; the City of Commerce requests that Metro explore and include the dedication of open space in the general area of the Pacific Metal Building that pays tribute to the former Vail Airfield as well as the history of the general area. This request is in addition to the interpretive material being recommended as a mitigation measure. If the mitigation measure is acknowledged, then the City of Commerce would like to take part in any consideration involving the dedication of open space as recommended herein.

- In addition, the plans show an aerial configuration occupying a considerable portion of the street side as the tracks head east along Washington Blvd. This may result in the bifurcation of this part of the community. Staff would like to work closely with METRO on alternatives to ensure the City is not left with a street side that is void of any pedestrian opportunities.

- The Project may potentially impact property within the City, including the one at Northwest corner of Washington Blvd. and Garfield Ave. The project should consider the widening of the west side of Garfield Ave. and north side of Washington Blvd. to create additional room for bus stops and a right turn lane from Garfield south to Washington west.

- The City is working on adding a right turn lane from westbound Washington Blvd. to northbound Garfield at the northeast corner. The plans reviewed by staff show impacts at this intersection, the widening of this intersection and adding a right turn lane may not be possible due to the proposed work/improvements related to Eastside Project. The Eastside

Phase 2 Project should consider reimbursing the City for the costs the City had spent related to the right turn evaluation (City did appraisals, survey, designs for the potential right turn lane).

- The Eastside Phase 2 Project will eliminate the third lanes (curb lanes) on both directions of Washington Blvd., starting at Garfield Ave., which will reduce the capacity of Washington Blvd. by approximately one-third. This may result in traffic being diverted to other City Streets. The Eastside Phase 2 Project should consider and provide mitigation measures to offset the impacts.

- The City is looking to realign some of the streets within the project area to provide for better mobility which would complement and mitigate the proposed Eastside Phase 2 Project. These include, but are not limited to Smithway St. being realigned, Saybrook Ave to be extended, and Tubeway St to be realigned and extended, among others. The City would like to request that Metro work with staff to discuss/explore the feasibility/options if the takes by the project can be evaluated/adjusted to assist the City with the proposed street extensions/realignments.

- The project should discuss various improvements to mitigate the impacts of the project, and consider improvements, such as upgrading signals, rehabilitation of pavements, sidewalks, etc. within the impact areas, especially along Washington Blvd.

- There are overhead Southern California Edison ("SCE") Power Poles along Washington Blvd. Discussions on the relocation, including grounding, should take place with SCE.

- The City of Commerce, and its staff are available to further discuss these comments or Metro's recommendations at any moment prior to final decision, as well as moving forward.

The items discuss herein are a summary of our comments, and should not be construed as an exclusive list of corrections or comments. Please feel free to reach out to us should you have any questions regarding the enclosed information on this letter. I can be reached by phone at 323-722-4805, ext. 2389 or via email at jjimenez@ci.commerce.ca.us. Thank you. Stay Safe. Stay Healthy.

### Response to A-9-1

Comment Submission A-9 is identical to Comment Submission A-7. See Responses to Comments A-7-1 through A-7-20.

## A-10: California Public Utilities Commission

### Comment A-10-1

The California Public Utilities Commission (Commission) has jurisdiction over rail crossings (crossings) and rail transit projects in California. All rail fixed guideway systems are subject to the Commissions Safety Oversight Program requirements. Safety Certification Plan (SCP) approval and Safety Certification Verification Report (SCVR) approval from the Commission are required for rail transit projects to be placed in revenue service. In addition, the California Public Utilities Code requires Commission approval for construction or alteration of crossings and grants the Commission exclusive authority on the design, alteration, and/or closure of crossings in California. The Commission's Rail Transit Safety Branch (RTSB) will review rail transit project matters and the Rail Crossings and Engineering Branch (RCEB) will review crossing matters. The

Commission has reviewed the Recirculated Draft Environmental Impact Report (DEIR) from Los Angeles County Metropolitan Transportation Authority (LACMTA or Metro), who is the lead agency for the proposed Metro Gold Line Eastside Transit Corridor Phase 2 Project (Project).

The Commission previously commented in 2010 to the project's Notice of Preparation of A DEIR, and again in 2014 to the project's DEIR. We welcome the opportunity to comment on the project's Recirculated DEIR. According to the Recirculated DEIR, the Project would extend the existing Metro Gold Line, or L Line, from the current terminus at Atlantic Station into eastern Los Angeles County. There are 3 proposed Base Build alternatives which have the same guideway alignment east of the existing terminus at Atlantic Station but vary in length: Alternative 1 Washington, Alternative 2 Atlantic to Commerce /Citadel initial Operating Segment (IOS), and Alternative 3 Atlantic to Greenwood IOS. There is also one No Build Alternative.

Additionally, two IOS alternatives are being evaluated in this Recirculated DEIR (Alternative 2 and Alternative 3). An IOS is a segment of the Project alignment that can function as a standalone Project with independent constructability (independent of other segments or phases to be constructed).

There are design options under consideration for each of the three Build Alternatives that consists of a variation in the design of the relocated/reconfigured Atlantic Station (applicable to Alternatives 1, 2, and 3) and a variation in the station and alignment profile in the city of Montebello (applicable to Alternatives 1 and 3). Construction and operation of one or both designs options are considered and evaluated for Alternative 1 and Alternative 3.

Base Alternative 2 to Commerce/Citadel IOS is the shortest alignment with 3.2 mile of underground alignment. Three new underground stations (including the relocated Atlantic Station) are proposed.

Base Alternative 3 includes Base Alternative 2 and would extend the project with an additional 1.5 miles of aerial alignment to an aerial terminal station (Greenwood Station) in the city of Montebello. The Montebello At-Grade design option to Base Alternative 3 would move 1.1 miles of the proposed aerial alignment in the base alternative to an at-grade alignment with 4 crossings.

Base Alternative 1 includes Base Alternative 3 and would extend the project with an additional 4.5 miles of at-grade alignment with 11 crossings. The Alternative 1 alignment crosses the Rio Hondo and San Gabriel River and the Rio Hondo Spreading Grounds. The existing San Gabriel River and Rio Hondo bridges would be replaced. The Montebello At-grade design option would also be applied to Base Alternative 1 and replace 1 mile of aerial alignment with an at-grade alignment with 4 crossings. According to conceptual drawings in the Recirculated DEIR, the at-grade alignments would be street running light rail transit along Washington Boulevard for Base Alternative 1 from Carob Way to the proposed terminus of Lambert Station in the city of Whitter. The at-grade alignments of the Montebello At-grade Options for Alternative 1 and 3 would also be street running light rail transit along Washington Boulevard between Yates Avenue and Carob Way in the city of Montebello.

The three Build Alternatives are rail fixed guideway systems and therefore will be subject to several rules and regulations involving the Commission. These may include, but are not limited to:

- California Public Utilities Code, Sections 1201 et al, which requires Commission authority to construct rail crossings

- California Public Utilities Code, Section 99152; rail transit safety
- Commission's Rules of Practice and Procedure, which detail the Formal Application process for construction or modification of a public crossing. These are available on the CPUC website: https://www.cpuc.ca.gov.
- The design criteria of the proposed project must comply with Commission General Orders (Gos), such as:
- GO 26 series, Clearances on Railroads and Street Railroads as to Side and Overhead Structures, Parallel Tracks and Crossings,
- GO 72 series, Construction and Maintenance of Crossings – Standard Types of Pavement Construction at Railroad Grade Crossings (if any),
- GO 75 series, Warning Devices for At-Grade Railroad Crossings (if any),
- GO 95 series, Overhead Electric Line Construction (if any),
- GO 128 series, Construction of Underground Electric Supply and Communication Systems,
- GO 143 series, Design, Construction and Operation Safety Rules and Regulations Governing Light-Rail Transit, and
- GO 164 series, Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems.

The project must ensure compliance with federal regulations including:

- 49 CFR Part 674, Rail Fixed Guideway Systems: State Safety Oversight.

The following link provides resources on the Commission's rules and regulations regarding rail safety: https://www.cpuc.ca.gov/about-cpuc/divisions/rail-safety-division.

### Response to A-10-1

The jurisdiction, oversight, reviews, and approvals identified in the comment are noted. The Project will comply with the cited rules and regulations. Additionally, the comment characterizes the Project correctly.

### Comment A-10-2

The proposed project options may disrupt the heavily used roadway network in the surrounding communities. The potential impacts should be identified, discussed, and evaluated for necessary safety improvements and mitigations at each proposed construction stage. This includes considering traffic circulation and queuing, level of service, emergency service response, and compliance with the Americans with Disabilities Act.

### Response to A-10-2

As discussed in Section 3.14.7.1 of the Recirculated Draft EIR, as identified in PM TRA-1, components of the Project shall include new or modifications to existing traffic signals to accommodate light rail movements and traffic circulation patterns at intersections, enhancements

to existing signalized crosswalks, and bicycle circulation and access amenities in immediate station areas. Additionally, sidewalks would not be altered to the extent that pedestrian circulation would be impaired or in violation of ADA standards. Furthermore, as identified in PM TRA-2 (see pages 3.14-46 and 3.14-47), Metro would coordinate with staff of the East Los Angeles Sheriff Station, Los Angeles County Fire Department Fire Station 50, and Presbyterian Intercommunity Health (PIH) Health Whittier Hospital in advance of any construction activities to preserve access. Standard practices, as identified in PM TRA-2, require that lane and/or road closures are scheduled to minimize disruptions in coordination with local fire and police departments prior to construction and that the nearest local first responders would be notified, as appropriate, of traffic control measures identified in the Traffic Management Plan (required under mitigation measure MM TRA-1) during construction to coordinate emergency response routing.

As explained in Section 3.14.2.2, Senate Bill (SB) 743, which was codified in Public Resources Code Section 21099, required the California Office of Planning and Research (OPR) to establish new CEQA Guidelines "for determining the significance of transportation impacts of projects within transit priority areas." The new criteria were required to move away from vehicle delay and level-of-service (LOS) and move toward more multimodal concepts "that may include, but are not limited to, vehicle miles traveled (VMT), vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." Public Resources Code section 21099 directed that once those guidelines were certified, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion" would no longer be considered a significant impact under CEQA.

OPR and the Natural Resources Agency certified and adopted the new criteria, contained in CEQA Guidelines Section 15064.3, in December 2018. LOS impacts are therefore no longer considered under CEQA.

### Comment A-10-3

For those Build Alternatives that contain elevated guideway, Commission authorization is required to construct the grade-separated crossings above streets and intersections. Similarly, for the Build Alternatives and design options that contain at-grade guideway, Commission authorization to construct at-grade crossings across roadways and through intersections is also required. LACMTA will have to apply to the Commission for approval of its crossing designs and authorization to construct those crossings. Applications to the Commission must include a copy of the environmental analysis undertaken by the applicant. We encourage early coordination with Commission staff in order to provide consultation on proposed design and engineering of this Project prior to filing applications seeking Commission authorization to construct.

### Response to A-10-3

Commission requirements are noted and will be complied with.

### Comment A-10-4

A general concern for this project regarding the construction of proposed aerial stations would be to ensure that the design provides adequate fall protection for passengers of berthing and departing trains and for patrons waiting on platforms. Additionally, careful consideration should be given to station configurations, including pedestrian paths of travel through the stations as patrons move between LACMTA trains and the other modes of transportation at the station locations. Pedestrian paths of travel should avoid crossing the tracks at grade to access or depart from the station platforms, where feasible.

### Response to A-10-4

Pedestrian and passenger safety is a key consideration for all stations. There is only one aerial station proposed, Greenwood station under base Alternative 1 and base Alternative 3. This station has a separate pedestrian overcrossing to allow for passengers to switch platform sides without having to cross the tracks. Required safety features will be incorporated at all stations and on structures, including at any proposed pedestrian crossings.

### Comment A-10-5

Finally, in addition to our general concerns above, Commission staff would like to advise you of some specific crossing related concerns with the Project as follows:

Evaluation of Transportation Impacts:

We understand that changes in CEQA on evaluating transportation impacts changed with the passage of SB 743 in 2013 and implementation in 2018 when the Governor's Office of Planning and Research (OPR) issued guidance in the form of a Technical Advisory on Evaluating Transportation Impacts in California Environmental Quality Act. All projects now must be analyzed by their impact on Vehicle Miles Traveled (VMT) rather than vehicle delay and level of service (LOS). The OPR's technical advisory specifies that transit and active transportation projects generally reduce VMT and are therefore anticipated to cause less than significant impacts on transportation.

Subsequently, the Recirculated DEIR indicates that changes to Washington Boulevard, for the at-grade guideways, like reductions in vehicle lanes from 3 to 2 per direction, elimination of ingress/egress movements at driveways and selected cross streets that can impact truck ingress/egress for industrial properties in Commerce and Montebello, are determined to result in less than significant impacts related to traffic circulation because the changes "would not preclude vehicle or truck access along Washington Boulevard and left-turn movements would continue to be allowed to and from major cross-streets (e.g., Garfield Avenue, Greenwood Avenue) at signalized intersections..." However, it is this type of interaction between vehicles and trucks at intersections with light rail vehicles that impacts safety and traffic circulation.

Commission staff cannot ignore the significant impacts to traffic that were identified in the 2014 DEIR, for which the Commission submitted comments. When reviewing the Transportation and Traffic Impact Report in appendix N of the Recirculated DEIR, we find that none of the impacts to traffic identified in the 2014 DEIR have been addressed. Specifically, there remain significant impacts for the following Build Alternatives:

Build Alternative 1 Washington with Montebello At-Grade Option:

The 2014 DEIR identified 16 of 17 intersections on the Washington Boulevard at-grade guideway would suffer significant/adverse impacts with no feasible mitigation measures identified due largely to ROW constraints or significant secondary effects to upstream and downstream intersections. (The Recirculated DEIR identifies 15 intersections with implementation of the Montebello At-Grade Option). These 16 intersections (2014 DEIR) would suffer Level of Service ratings of E or F, resulting in unacceptable traffic congestion impacts to surface traffic.

It is these types of negative impacts to traffic circulation that lead to increased roadway user frustration, increased motorist risky behavior and higher risks of train-vehicle collisions at signalized intersections. Furthermore, experience has shown that at-grade street-running

guideways lead to driver confusion and vehicle-train collisions, especially from vehicles making left turns and U-turns across LRT tracks at roadway intersections. LACMTA continues to struggle with these types of collisions on every street-running portion of its existing A/Blue Line, L/Eastside Gold Line Phase 1, and E/Exposition Line.

In addition, the 2014 DEIR also identified the two intersections: Rosemead Boulevard and I-605 Freeway/Pioneer Boulevard based on detrimental impacts to intersection Level of Service and efficiency. It also identified design options to grade separate these two locations to eliminate the adverse impacts of the project. Commission staff recommends these grade separation options be implemented if Build Alternative 1 is selected.

Also, if Build Alternative 1 is selected, Commission staff recommends reevaluating the 11 intersections for grade separation.

## Response to A-10-5

See Response to Comment A-10-2, which explains why changes to level in service are no longer considered significant impacts under CEQA. LOS impacts identified in the 2014 DEIR are therefore no longer applicable.

Grade separations are evaluated based on Metro's Grade Crossing Safety Policy. As stated in Section 3.14.6.3.1 of the Recirculated Draft EIR, an initial screening (Milestone 1) analysis according to Metro's Grade Crossing Policy indicates that all proposed grade crossings under Alternative 1 would fall under the least restrictive category "At Grade Operation Should Be Feasible," with the exception of the crossing at the Lambert Road terminal approach. At this location, the alignment would be at-grade and cross eastbound traffic on Washington Boulevard to access the station platform. The initial screening shows that this location would fall under the "Possible At Grade Operation" category. This grade crossing, like the others proposed elsewhere on the line, would be designed according to applicable MRDC and standards and would include traffic signal coordination and upgrades to avoid conflicts between light rail vehicles (LRV) and eastbound traffic along Washington Boulevard. Regarding safety, as identified in project measure PM TRA-1 in Section 3.14.7 of the Recirculated Draft EIR, unsignalized left turns and pedestrian crossings would be controlled using best practice safety measures, such as channelization, use of barriers, high visibility curbs between the guideway and roadway, and barriers to protect and route pedestrians. As discussed in Section 3.14.6.4 of the Recirculated Draft EIR and as identified in project measure PM TRA-1, all new LRT facilities and crossings would be designed in accordance with MRDC, including Fire/Life Safety Criteria, to ensure safety and minimize potential hazards at all locations. Additionally, best practice safety measures would be implemented to minimize potential conflicts including mid-block crosswalks, signal-protected pedestrian movements, channelization, high visibility curbs between the guideway and roadway to prohibit vehicles from driving onto the tracks, barriers to protect and route pedestrians, ADA-compliant curb ramps, and warning signs to provide for convenient and safe access to station platforms. As such, the commentor's concerns regarding train and vehicle collisions at intersections would not amount to significant safety impacts.

## Comment A-10-6

We also recommend not implementing the Montebello At- Grade Option and keeping that portion of the guideway grade-separated.

Build Alternative 3 Atlantic to Greenwood IOS with Montebello At-Grade Option:

Commission staff has the same concerns for the four at-grade intersections that would be constructed with implementation of the Montebello At-Grade Option as previously discussed under our comments to Build Alternative 1, above. Commission staff recommends that if Build Alternative 3 is selected, the Montebello At-Grade Option be eliminated so that no new at-grade crossings are constructed.

### Response to A-10-6

The commenter's opposition to the Montebello At-Grade Option is noted. For a discussion of grade separations and grade crossings, see Response to Comment A-10-5.

### Comment A-10-7

The Commission appreciates the opportunity to provide comments on the project described in the Recirculated DEIR. Please feel free to contact me at (916) 928-6858 or daren.gilbert@cpuc.ca.gov or contact our lead staff on this project: Ainsley Kung at (213) 330- 9496 or ainsley.kung@cpuc.ca.gov for transit safety matters and Jose Pereyra at (213) 576-7083 or jose.pereyra@cpuc.ca.gov for crossing matters.

### Response to A-10-7

See Responses to Comments A-10-1 through A-10-6 above.

## A-11: Caltrans District 7

### Comment A-11-1

Thank you for the opportunity to provide input on the Draft EIR for the Eastside Transit Corridor Phase 2 Project.

Caltrans is eager to enhance and connect the multimodal transportation network, we highly recommend that commuters be offered incentives to encourage the use of rail options for example, offering commuters a free ride ticket.

### Response to A-11-1

Comment noted.

### Comment A-11-2

Metro will need to apply for an encroachment permit because the proposed project will encroach on State Right of Way on I-605. The National Environmental Policy Act (NEPA) applies to encroachment permits when there is federal funding, or a federal approval is required. Examples of federal approvals include:

- Federal Highway Administration (FHWA) or Caltrans approval of a non-highway use on a federal-aid highway.
- A federal permit issued by another federal agency (e.g., United States Army Corps of Engineers (USACE), United States Fish and Wildlife Service (USFWS), etc.).
- The action is occurring on federal lands requiring the federal land-management agency to comply with NEPA.

### Response to A-11-2

The Project will comply with Caltrans permit/approval requirements. A NEPA evaluation of the Project is currently underway.

### Comment A-11-3

FHWA or Caltrans Approval of a Non-Highway Use

FHWA approval of a non-highway use on a federal-aid highway is a federal action that requires compliance with NEPA, even in those instances in which the approval of the non-highway use (i.e., the encroachment permit or other right-of-way agreement) is delegated to Caltrans through the FHWA/Caltrans Stewardship and Oversight Agreement. A federal-aid highway is defined as any public highway eligible for Title 23 assistance (funding) except a highway functionally classified as a local road or rural minor collector. The "federal-aid system" is synonymous with the "National Highway System" which includes interstate routes.

### Response to A-11-3

The Project will comply with Caltrans permit/approval requirements. A NEPA evaluation of the Project is currently underway.

### Comment A-11-4

Biological Resources:

1) General- When trimming trees, in addition to impact concerns to nesting or migratory birds, no more than 25% of the tree canopy should be removed during trimming to reduce impacts to, and preserve the integrity of, the tree.

### Response to A-11-4

The Recirculated Draft EIR requires that operation and construction of the Project would comply with local requirements for protecting street trees and determined that impacts would be less than significant. Section 3.3.6.4 of the Recirculated Draft EIR acknowledges that operation and construction of the Project could require tree trimming at various locations along the Build Alternatives. As discussed in Section 3.3.2.3 of the Recirculated Draft EIR and in more detail in Section 3.3.2 of Appendix D, Los Angeles County and cities within the Build Alternatives' biological resources study areas (BRSAs) have local regulations pertaining to the protection of street trees in public areas. In addition, subsequent to publication of the Recirculated Draft EIR, the Metro Board of Directors adopted the LA Metro Tree Policy, which includes requirements pertaining to the protection of street trees that may be adversely affected during construction (see Response to Comment A-3-6 for additional information). Any maintenance that requires tree trimming and construction activities that require tree removal or trimming would comply with the LA Metro Tree Policy and with local policies and municipal codes protecting native trees and street trees, per Section 3.3.6.4 of the Recirculated Draft EIR, as revised in this Final EIR. Furthermore, tree trimming is expected to be minor and construction and maintenance activities would impact the least area and number of trees necessary. As stated in Section 3.3.6.4 of the Recirculated Draft EIR, as project design progresses and construction plans are finalized, it may be possible to minimize the number of affected trees by avoidance or fencing. Per the revisions to Section 3.3.6.4 in this Final EIR, in accordance with the LA Metro Tree Policy, Metro would protect large trees that would remain in place from immediate damage during construction and from delayed damage due to

construction activities, such as loss of root area or compaction of the soil by equipment. Thus, additional protections for street trees are not necessary.

Impacts on migratory birds are discussed in Section 3.3.6.1 of the Recirculated Draft EIR, as revised in the Final EIR. Per the revisions to Section 3.3.6.1 in the Final EIR, tree trimming along the alignment would primarily affect smaller branches that may be starting to encroach into the transit right-of-way where most birds would be unlikely to nest. Maintenance activities would be required to comply with the MBTA, California Fish and Game Code, and other regulations protecting migratory birds. In the event that tree trimming is needed during the tree establishment maintenance period, implementation of MM BIO-4, which requires nesting bird surveys and avoidance of active nests during the bird nesting season, would ensure that bird nests would be avoided.

### Comment A-11-5

2) P. 3.3-5, under 3.3.3.2.2 Rare Plant Surveys, indicates that rare plant surveys were conducted during May 2016. A more current rare plant survey should be conducted prior to construction or clearing and grubbing, or any vegetation removal.

3) P. 3.3-9, Paragraph 5, Sentence 1: Since surveys for bats and bat habitat were conducted in September 2015 at the Washington Boulevard bridges over the Rio Hondo and San Gabriel River, an additional survey should be conducted prior to construction.

### Response to A-11-5

As discussed in Section 3.3.3.2.6 of the Recirculated Draft EIR, site visits were conducted on March 28, 2021 and April 9, 2021 to document existing conditions. Additionally, as detailed in Section 3.3.3.2 and Appendix D Attachment A, an updated desktop review was performed in 2021 to re-evaluate the current status of biological resources in the BRSA. Based on these site visits and a desktop review of existing conditions, there have been no substantial changes to habitats, vegetative conditions, special-status species, wetlands, street trees, or other biological resources in the BRSA since the completion of the previous field surveys. The previous surveys adequately describe the existing biological resources in the BRSA.

As detailed in Section 3.3.7.2 of the Recirculated Draft EIR, and revised in the Final EIR, MM BIO-1 through MM BIO-3 would be implemented to protect bats from construction activities and ensure that bats have alternative habitat options during construction. These mitigation measures require pre-demolition bat surveys at each affected bridge site, removal of cliff swallow nests that provide or could provide bat habitat, and the development of alternative bat habitat or implementation of bat exclusion measures as needed. Thus, the Recirculated Draft EIR already requires that bat surveys be conducted prior to construction.

### Comment A-11-6

4) P. 3.3-16, Paragraph 2, Sentence 1: In addition to Oregon wedge enclosures and bat houses, bat habitat in the form of crevices or gaps on the underside concrete portion of a bridge should be incorporated into the plans for any new bridges over drainages or open spaces where bats are known to exist and done in such a manner as to not interfere with maintenance activities.

### Response to A-11-6

As discussed in Section 3.3.6.1.1 of the Recirculated Draft EIR, permanent loss of bat roosting sites at bridges over the Rio Hondo and/or San Gabriel River is not anticipated as bats require only a

small opening and the new bridges are likely to have crevices in the substructure of the bridges where bats could roost. Thus, no significant impacts during operations on bat roosting would occur and no mitigation requiring crevices or gaps on the underside of the bridges is required.

### Comment A-11-7

5) P. 3.3-16, Paragraph 2, Sentence 2, and Paragraph 2, Sentence 1: A sound survey should be conducted once the rail system is completed to determine the difference in sound levels below the conventional highway bridges and any newly constructed rail bridges to determine if sound impact minimization or mitigation measures are necessary for roosting bats or nesting birds.

### Response to A-11-7

As discussed in Section 3.3.6.1.1 of the Recirculated Draft EIR, bats and nesting birds roosting in bridges under existing conditions are already adapted to the regular noise and vibration from vehicular traffic. Thus, recurring train movement from operation of Alternative 1 would not inhibit bat roosting and no significant impact would occur. Furthermore, as detailed in Section 3.11 of the Recirculated Draft EIR, operation of Alternative 1 would have less than significant impacts on ambient noise levels in the vicinity of the Project. With implementation of mitigation, the Project would have less than significant impacts related to the generation of excessive ground-borne vibration or ground-borne noise levels.

### Comment A-11-8

6) P. 3.3-32, Paragraph 4, MM BIO-2, Sentence 1: Caltrans uses a nesting bird survey season of February 1 to September 1 for all passerines and songbirds, and January 1 to September 1 for raptors.

### Response to A-11-8

The nesting season referenced in MM BIO-2 is specific to cliff swallows, which have a slightly later bird nesting season than other passerines or songbirds. Thus, the start of the bird nesting season referenced in mitigation measure MM BIO-2 (February 15) is appropriate. However, the mitigation measure has been revised in the Final EIR from February 15 to August 31, as currently referenced, to February 15 to September 15 to be conservative and consistent with recommendations provided by the California Department of Fish and Wildlife (see Comment A-3-7 and Response to Comment A-3-7).

### Comment A-11-9

7) P. 3.3-33, Paragraph 1, MM BIO-3, Sentence 1: It should be noted, and exclusionary measures developed for bats that roost in the falsework of a bridge during construction.

### Response to A-11-9

Roosting bats that would use falsework and be disturbed during construction would be able to fly away from the site. Additionally, the Project would be required to follow mitigation measure MM BIO-3, discussed in Section 3.3.7.2 of the Recirculated Draft EIR and revised in the Final EIR, which include bat exclusion measures on bridges and within 100 feet of affected bridges. Thus, impacts on bats would be mitigated to less than significant.

### Comment A-11-10

8) General: A mitigation measure for storage of equipment in environmentally sensitive areas such as riverbeds should include the use of drip pans to prevent equipment fluids from entering the environment.

### Response to A-11-10

As discussed in Impact HAZ-1 and identified in project measures PM HAZ-2 in Section 3.8.7.1 of the Recirculated DEIR as revised in the Final EIR, Metro would obtain and comply with a National Pollutant Discharge Elimination System (NPDES) permit, specifically the State Water Resources Control Board (SWRCB) Construction General Permit. As part of the Construction General Permit, the contractor would be required to prepare and implement a Stormwater Pollution Prevention Plan which would include best management practices (BMP), including BMPs to minimize potential fugitive emissions of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. Service/maintenance vehicles would carry materials to absorb leaks or spills. Servicing, refueling, and staging of construction equipment would take place only at designated areas where a spill would not flow to drainages. Also see details of SWPPP requirements in Section 3.9.7.1 in Section 3.9, Hydrology and Water Quality, of the Recirculated DEIR. Therefore, as the Project would comply with PM HAZ-2, the recommendations presented in the comment would occur. There would be no significant impacts and no mitigation measures are required.

### Comment A-11-11

Traffic:

During construction, I recommend that hauling trucks should avoid congested freeway locations especially during peak hours. To avoid debris from falling down, a tarp cover is recommended.

### Response to A-11-11

Hauling would be carried out in compliance with California Vehicle Code Sections 23114 and 23115 regulating proper covering of vehicles. As identified in MM TRA-1 as revised in this Final EIR, construction-related travel would be scheduled during off-peak hours where feasible.

### Comment A-11-12

On Washington Boulevard at the I-605 Interchange, if there's a reduction in the number of lanes, a Traffic Operations Analysis Report (TOAR) including an Intersection Control Evaluation (ICE) should be prepared. Also, per HDM Section 308.1, depending on the proposed lane configuration: Where the 2-lane local facility connects to a freeway within an interchange, the lane width of the local facility shall be 12 feet.

Where a multilane local facility connects to a freeway within an interchange, the outer most lane in each direction of the local facility shall be 12 feet. If Metro cannot conform to the Highway Design Manual (HDM) standard, then a Design Standard Decision Document (DSDD) must be completed.

### Response to A-11-12

Project-related improvements affecting Caltrans facilities will undergo the required design reviews and evaluation reports, subject to Caltrans review and approval processes; however, it should be noted that completion of such reviews and evaluations is not required as part of the CEQA process. Under current CEQA requirements, regional VMT is used as the metric for determining

traffic impacts within an EIR. Regardless, the comment related to HDM 308.1 is noted as the multilane local facility scenario would be applicable to the proposed configuration. There is a lane reduction from three to two westbound lanes where the southbound off-ramp meets Washington Boulevard. Twelve feet (or more) for the outside lane will be provided where possible, and the approach will be confirmed at a few pinch points. If further design determines that less than twelve feet is needed, a DSDD will be prepared.

### Comment A-11-13

Visual Resources:

Refer to the San Gabriel River Master Plan for aesthetic consideration for Washington Boulevard Bridge over the San Gabriel River. In addition, The Los Angeles River Design Guidelines are applicable standards for trails, lighting, fences, bridges, and other landscape elements that will also apply to the San Gabriel River.

With respect to the I-605 Washington Boulevard Bridge Under Crossing, if the bridge is modified, aesthetic treatment must comply with the I-605 Corridor Aesthetic Master Plan, MTA/Caltrans.

### Response to A-11-13

The requests for aesthetic treatment considerations for the proposed bridges at Rio Hondo and San Gabriel River are noted. Metro will continue to engage with and solicit input from community organizations on the Project's design as it proceeds, contingent upon approval of the Project by the Metro Board, through preliminary engineering, final design, and construction. The architectural treatments will comply with applicable design standards and be determined during the preliminary engineering and design phase of the Project.

### Comment A-11-14

Air Quality:

According to the Air Quality Impacts Report (dated June 2022), the project construction is set to complete by 2035. However, construction emissions for all alternatives are quantified based on construction schedules that begins on 1/1/22 and end, respectively, on 10/8/26 (Alt 1) or on 10/22/25 (Alt 2) or on 8/25/26 (Alt 3). The construction emissions quantified for evaluation in the Report account for emissions from certain mobile sources; therefore, it is suggested to revise the construction emissions estimate based on the updated construction schedules to complete by 2035.

### Response to A-11-14

The comment summarizes the Air Quality Impact Report's construction criteria pollutant analysis accurately. Criteria pollutant emissions are estimated based primarily on projected equipment usage during construction activities and equipment engine exhaust emission factors from industry standard models, as described in Section 3.2.3 of the Recirculated Draft EIR. The emission factors from these models decrease over time, accounting for general turnover in equipment in the regional vehicle fleets and implementation of newer engine technologies compliant with adopted future vehicle engine standards. Therefore, by modeling construction emissions during an earlier timeframe, the construction criteria pollutant analysis represents a conservative assessment of criteria pollutant emissions for the construction of the Project.

### Comment A-11-15

Hydrology:

- Has a Location Hydraulics Study for crossing, river or creek etc. been prepared?

### Response to A-11-15

Mitigation measure MM HWQ-2, as discussed in Section 3.9.7.2 of the Recirculated Draft EIR, and revised in the Final EIR, requires the construction of compensatory mitigation to compensate for potential loss of flood storage and infiltration potential due to placement of the bridge piers based on the volume of the flood storage loss and a hydraulic analysis. Thus, Metro is required to prepare a hydraulics analysis for the Washington Boulevard crossing of the Rio Hondo and San Gabriel River. This would occur during bridge design and engineering. Additionally, as discussed in Response to Comment A-3-4, MM HWQ-2 has been revised to include the following text:

> *A hydrology report to assess changes in hydrologic activity, velocity of flows, and water availability onsite and downstream of the Project and assess scour or erosion at the Project site will be prepared and submitted to CDFW in conjunction with the Lake and Streambed Alteration Notification for the Project*.

### Comment A-11-16

- If Caltrans drainage systems are being impacted due to proposal, then Caltrans Hydrology Unit must review the encroachment permit package.

### Response to A-11-16

Comment noted.

### Comment A-11-17

Hazardous Waste:

1. Page ES-20 to 25 (Hazards and Hazardous) - It states "Alt 1 with Potentially Significant including MM HAZ-1 thru 5 various hazardous concerns". Since this EIR covers the whole project of the 9 miles limit. It is recommended to have a separate section, or a separate report, to focus on Caltrans ROW portion of the hazardous finding/discussion.

### Response to A-11-17

The comment references Table ES-3 in the Executive Summary of the Recirculated Draft EIR, which provides a summary of the information presented in Section 3.8, Hazards and Hazardous Materials, and Appendix I, Hazards and Hazardous Materials Impacts Report. The commenter is correct that the Recirculated Draft EIR addresses the full 9-mile alignment. As presented in Section 3.8 and Appendix I of the Recirculated Draft EIR, the analysis provides a general discussion of hazards and hazardous materials along the entire alignment, and it also identifies specific locations of concern (see Section 3.8.5 and Appendix I Section 6.0). These specific areas are identified by text and shown on maps so that their location relative to the Project alignment can be readily identified. As shown on the maps, no specific areas of concern relative to hazards and hazardous materials sites are identified within the Caltrans ROW at I-605. Providing a separate section or report to discuss this portion of the alignment is neither warranted or required relative to determining the Project's potentially significant hazard and hazardous material impacts.

### Comment A-11-18

2. Section 3.8 (Hazards and Hazardous) - Section 3.8.5.2 mentioned a "May 2021 Draft Final ISA identified 30 affected properties", and Figure 3.8.3 identified site 27 to be the nearest location to I-605. Please verify if any ISA concern regarding at the Caltrans ROW vs. the Project SOW. Please also refer the Section 3.8.5.3 Omega Superfund Site for the ISA concern.

### Response to A-11-18

The Commenter is correct that Site 27 is the closest to the Caltrans right of way (ROW). Project construction and operation at Site 27 does not pose a risk that could impact the Caltrans ROW. The comment regarding the Omega Superfund Site is unclear. The Omega Superfund Site is identified on Figure 3.8.3 and is not related to Site 27. Project construction and operation at the Omega Superfund site would not affect the Caltrans ROW.

### Comment A-11-19

3. Section 3.8 (Hazards and Hazardous) - Section 3.8.5.4 states "hazardous materials from roadway corridors has lead concerns on yellow thermoplastic and yellow-painted traffic stripe and pavement marking". In additional to that, the non-yellow traffic striping may also contain lead but may be classified as non-hazardous waste for disposal. It is still an OSHA requirement to obtain an LCP/HASP for worker safety.

### Response to A-11-19

MM HAZ-4 in Section 3.8.7.2, Hazards and Hazardous Materials, of the Recirculated Draft EIR requires the contractor to prepare site-specific safety manuals and construction work plans to protect the general public and workers in the construction area for Metro's review and approval. The safety manuals and construction work plans shall be prepared in accordance with State and California Division of Occupational Safety and Health (Cal/OSHA) regulations. Copies of the plans shall be made available to construction workers for review during their orientation and/or regular health and safety meetings. The plans shall identify chemicals of concern, potential hazards, worker training requirements, personal protective equipment and devices, decontamination procedures, the need for personal or area monitoring, and emergency response procedures. The plans shall be amended, as necessary, if new information becomes available that could affect implementation of the plan.

### Comment A-11-20

4. Section 3.8 (Hazards and Hazardous) - Section 3.8.7 Impact Evaluation HAZ-1 mentions Phase II Environmental Site Investigation (ESI), however ADL was not addressed. It is contradicting the statement in the EIR states "Aerially-deposited lead (ADL) can be present along major roadway corridors, such as Washington Boulevard and Atlantic Boulevard, from historical use of leaded gasoline (DTSC 2004)", and the May 2021 Draft Final ISA Report identified "Elevated concentrations of lead (from use of leaded gasoline) and other metals are sometimes associated with older roadways. ADL may be present in shallow soil along these roadways, especially along Atlantic Boulevard and Washington Boulevard". Please clarify if the "metals" mentioned in MM HAZ-1 includes ADL and Title 22 metals for ESI.

### Response to A-11-20

MM HAZ-1 on page 3.8-69 of the Recirculated Draft EIR and page 136 of Appendix I, Hazards and Hazardous Materials Impacts Report, have been revised to reflect the following correction, which

is shown in underlined italicized (new) text. Additional revisions were also made to enhance clarity.

> Phase II Environmental Site *Assessment* ~~Investigation~~ (*ESA*~~ESI~~). ~~Prior to the issuance of a grading permit and b~~*B*efore any substantial ground disturbance occurs on or near the properties with documented releases, Metro shall hire a qualified environmental professional to conduct a Phase II Environmental Site *Assessment* ~~Investigation~~ to determine the potential presence of petroleum hydrocarbons, metals *(i.e., lead that was aerially deposited and lead chromate) that exceed thresholds established by the California Health and Safety Code and Title 22*, and VOCs in soil and/or groundwater in accordance with the findings and recommendations of the Draft Final Initial Site Assessment Report prepared for Alternative 1 (Washington Alternative) (Kleinfelder 2021).

This change does not alter the environmental conclusions reached in the Recirculated Draft EIR.

**Comment A-11-21**

5. Please identify Caltrans ROW and provide a Caltrans specific conceptual design plan and the scope of work.

**Response to A-11-21**

Caltrans ROW will be identified on project plans. That information is not necessary for an adequate environmental analysis under CEQA. Metro's standard process for submitting plans and scopes of work with Caltrans will be followed for this project.

**Comment A-11-22**

In the event if the Project involve work within Caltrans ROW, a Caltrans Project Specific Initial Site Assessment (ISA), a Health and Safety Plan (HASP), and Site Investigation Work Plan (SI-WP) are required for Caltrans review / approval prior for Caltrans permit to access for a Site Investigation (SI).

**Response to A-11-22**

This project will follow Metro's standard process for coordinating work with Caltrans within the Caltrans ROW and comply with Caltrans permits/requirements.

# 4.3.2.2 Community Organizations

## CO-1: East Los Angeles Chamber of Commerce

**Comment CO-1-1**

Eddie Torres, resident of East Los Angeles, co-founder of the East Los Angeles Coalition. So I'm the co-founder of the East Los Angeles Coalition. Early on we asked Metro to provide us with parking if they were going to take the Sketcher's parking lot on Atlantic and Whittier. We see that the EIR is going to affect the parking structure, and we're going to lose the parking structure on Atlantic and Whittier. So we feel that we need parking replaced because people are going to be coming and parking in private parking lots to go take the Metro. They do it right now currently on the Pomona and Atlantic station. Instead of paying for parking, parking at the station, they'll park at the Metro Plaza privately-owned parking, and they'll park at the McDonald's parking and --

because the customers -- the businesses lose the customer parking, right. And then also we've asked from Metro and the powers that be to strongly enforce the parking regulations on Atlantic Boulevard because, once the construction starts, there's going to be less parking and more impacts.

### Response to CO-1-1

Pursuant to SB 743, adequacy of parking is not a significant impact under CEQA (see Pub. Resources Code, § 21099(b)(3)). As described in Section 2.5.1.2 of Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the relocated Atlantic/Pomona station, and surface parking would be provided at each of the at-grade stations. Regarding construction, mitigation measure MM TRA-1 described in Section 3.14.7 of the Recirculated Draft EIR and modified in the Final EIR would facilitate the flow of traffic in and around construction zones; this will include developing and implementing a program with business owners to minimize effects to businesses during construction activity.

### Comment CO-1-2

L.A. County spent over $100,000 on a parking study proving that we were -- for the businesses we didn't have enough parking spaces to have -- help the businesses stay in business, flourish. But on that note they're not enforcing any of the parking laws, and when Metro starts, it's going to be increased of an impact.

### Response to CO-1-2

See Response to Comment CO-1-1 above regarding parking associated with the Project.

### Comment CO-1-3

We've asked from the very beginning to have security and be -- be aware that the underground stations, we want to make sure that there's security and there's people looking out for the commuters and not allow the homeless people to bother them or set up encampments. I don't see that addressed.

### Response to CO-1-3

The potential for the Project to attract people experiencing homelessness is beyond the scope of CEQA to address. Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment. See Response to Comment A-8-19 regarding security and people experiencing homelessness.

### Comment CO-1-4

The addresses that were clearly stated in prior EIR's from Metro now are parcel numbers. We feel that that's a disservice to the process, and they're not being transparent.

### Response to CO-1-4

Where specific properties are discussed in the Recirculated Draft EIR main document (Volume 1, Chapter 1 through Chapter 9), the properties are identified by street address and Assessor's parcel number (APN) (see Section 3.4, Cultural Resources, and Section 3.8, Hazards and Hazardous Materials, of the Recirculated Draft EIR, as revised in the Final EIR).

The commenter may be referring to Volume 2, Advanced Conceptual Design, which consists of the conceptual engineering plans for the Project and which identifies easements and partial easements by APN. The use of APNs on the drawings instead of listing addresses is consistent with standard practice for engineering drawings. The location of the referenced parcel is marked on the drawings, so the specific property can be understood. Further, CEQA Section 15151 states that "An EIR Should be prepared with a sufficient degree of analysis to provide decision makers with information which enable them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effect of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." The parcel numbers provided in Volume 2 were determined to be reasonably feasible for meeting the purpose of an EIR.

### Comment CO-1-5

Metro on the Third Street project promised us businesses on the bottom floor of the Metro parking lot on Pomona and Atlantic. They never did that. They promised us they were going to replace the parking that they took along third street. Metro never did that. So we want to hold Metro accountable and make sure that we get all that we need and not sold a bill of goods.

### Response to CO-1-5

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment CO-1-6

Also, the East Los Angeles Chamber of Commerce and the East L.A. Coalition support the covered concept for the relocation of the Atlantic and Pomona station. We do not support the open-air design. Thank you.

### Response to CO-1-6

The commenter's support for the underground Atlantic Station (relocated/reconfigured) and opposition to the open-air Atlantic/Pomona Station Option is noted.

## CO-2: East Los Angeles Chamber of Commerce

### Comment CO-2-1

My name is Eddie Torres, resident, East Los Angeles, all my life. I'm here representing the East Los Angeles Chamber of Commerce that has the best interest of the business of the community. NO. 1, the timeline for this Metro project right now is too fast. It started from the first meeting in January, now mid July -- early July, it's already going to the EIR. That's too fast.

### Response to CO-2-1

The commenter states that the Project timeline for outreach meetings in relation to the publication of the Recirculated Draft EIR is too expedited. However, as discussed in Chapter 6, Public Outreach, in the Recirculated Draft EIR, Metro has implemented a comprehensive outreach program for the Project, starting in 2007 with outreach meetings for the Alternatives Analysis (AA) and continuing through the present time for the efforts related to this EIR. Pursuant to CEQA, Metro issued a Recirculated Notice of Preparation (NOP) on May 31, 2019 for the Recirculated Draft EIR. Metro conducted six public Scoping Meetings in June 2019 to receive formal public

comments on the Build Alternatives and their potential impacts to the environment and quality of life. In 2020, in anticipation of recommending the withdrawal of the SR-60 Alternative and Combined Alternative from further evaluation to the Metro Planning and Programing Committee and Metro Board, Metro staff prepared for and planned three community meetings in February 2020 to provide a comprehensive Project update. Metro hosted another round of update meetings in November 2021 to provide a Project update, share information on the ongoing station design efforts. As a follow-up to the community meeting series hosted in November 2021, Metro hosted another round of update meetings in March 2022 to provide Project updates focused on specific communities and cities to share information on the ongoing station design efforts and provide stakeholders the opportunity to ask questions. Information was also provided at the meetings to inform the public of the expected date when the Recirculated Draft EIR would be released to the public. The public outreach plan prepared for the Recirculated Draft EIR is consistent with outreach requirements outlined in CEQA.

### Comment CO-2-2

There is -- the community had a meeting at Atlantic Park, and there was a lot of people that just were shut off. Their comments were not heard. Metro never made that up to us.

### Response to CO-2-2

The commenter may be referring to a community meeting held on March 9, 2022 that was scheduled for one hour. This was one of four one-hour community meetings that took place between March 9 and March 17, 2022 that were held virtually and also had an in-person technical booth location with free wifi, laptops for participants to use, and staff support. The intent of the four meetings was to provide the public with information on the Project in advance of the public release of the Recirculated Draft EIR. Following the presentation, the public was allowed to provide input through the online chat feature or a live question and answer feature. To ensure that as many participants were able to speak as possible within the allotted time, speakers were limited to 90 seconds. Participants were not allowed to use their webcams, and microphones were only enabled during a speaker's 90 second time period. The one-hour meeting was extended an additional 30 minutes to allow a greater number of people to speak and concluded after the 30 minutes of added time. This meeting was one of many public meetings and public events that have been held to provide the public with opportunities to learn and speak about the Project. Following the March 9 meeting, the three additional meetings identified above were in held in March, public information sessions were held in June 2022, and public hearings on the Recirculated Draft EIR, which included public comment opportunities, were held in July and August 2022. See Chapter 6, Public Outreach, of the Recirculated Draft EIR regarding the public outreach and opportunities/methods that have been available to the public to provide input on the Project. See also Response to Comment CO-2-1 and Response to Comment CO-4-9 regarding opportunities for providing comment relative to the CEQA process and CEQA requirements.

### Comment CO-2-3

The EIR doesn't list addresses. It gives parcel numbers. So we had to research it. And thank God for Hilda Solis' office. They gave us the actual addresses, and there's a ton of them. Why would you hide that?

### Response to CO-2-3

See Response to Comment CO-1-4 regarding use of parcel numbers in the Recirculated Draft EIR.

### Comment CO-2-4

The station being relocated from Atlantic and Pomona where it's currently at to Atlantic and Beverly, I believe, we should have had some renderings here to see the covered concept or the open concept.

### Response to CO-2-4

As discussed in Chapter 2, Project Description, the Atlantic station (relocated/reconfigured) would be fully underground while the Atlantic/Pomona Station Option would be a shallow open air underground station with two side platforms and a canopy. While renderings are not currently available, the conceptual site plans for the stations are shown in Chapter 2, Project Description, Figure 2.7 Atlantic Station (Relocated/Reconfigured Conceptual Site Plan) on page 2-17 and Figure 2.14 Atlantic/Pomona Station Option on page 2-21 of the Recirculated Draft EIR. Additional discussion of the station aesthetics is discussed in Section 3.1, Aesthetics, of the Recirculated Draft EIR.

### Comment CO-2-5

The EIR should be extended because we don't have city council to oversee what we're doing. Being part of the East L.A. Chamber of Commerce, one of the local voices you have, I have a sign-in sheet here. So if anyone wants to join, I'm part of the East L.A. Coalition, residents and businesses working together to hold Metro accountable. We don't want another Third Street. Thank you.

### Response to CO-2-5

The comment appears to be suggesting that the public review period of the Recirculated Draft EIR be extended because it is not being overseen by a city council. Metro has the principal responsibility for carrying it out this Project and therefore, pursuant to CEQA Section 21067, is the lead agency. The certification of the Project's EIR will be considered by the Metro Board of Directors. Cities (and their city councils) located along and near the Project's alignment have been provided with opportunities to provide input on this Project. Additionally, the cities were notified of the release of the Recirculated Draft EIR, and, along with other public agencies and members of the public, were given the opportunity to provide public comments.

Regarding the length of the public review period, the public review period for the Recirculated Draft EIR was 60 days from June 30 to August 29, which is longer than the minimum 45 day public review period required under CEQA. The longer time period was provided to additional time for agencies and members of the public to review and comment on the document and no further extension was required.

## CO-3: Via Care Community Health Center

### Comment CO-3-1

We serve over 8,000 low-income individuals with life-saving primary care medical, dental, behavioral health and supportive services, at our non-profit federally-qualified health centers on Atlantic Blvd. It is critical that the impacts of this project be transparent and fully investigated. Any interruption or loss of our services could have severe impacts on the health and well-being of the surrounding community, and our ability to deliver services. Thank you.

### Response to CO-3-1

The Recirculated Draft EIR was prepared to comply with CEQA and is a public disclosure document that objectively evaluates the environmental impacts of the Project to inform government decision-makers and the public of the environmental effects of a proposed activity and to avoid or reduce significant impacts of the activity when feasible to do so. The Recirculated Draft EIR assesses potential impacts from operation and construction of the Project on a variety of resources. See the Recirculated Draft EIR for a complete list of resource topics. A summary of impact evaluations for all resource topics considered in the Recirculated Draft EIR and identification of required mitigation measures to reduce significant impacts, is provided in Table ES-2 in the Executive Summary of the Recirculated Draft EIR. As described therein, impacts associated with transportation and traffic (Section 3.14) are less than significant with the incorporation of mitigation during construction and impacts on public services (Section 3.13) are less than significant and no adverse impacts to health services are expected.

## CO-4: East Los Angeles Boyle Heights Coalition

### Comment CO-4-1

In East Los Angeles, Boyle Heights and beyond we claim genocide and ecocide! People in our communities have died and so have other life forms. Entire families in our neighborhoods are chronically sick. Children have been born with congenital health problems and families have suffered from spontaneous abortion and other reproductive issues. Our future generations along with the planet will forever be impacted by the long term environmental racism we have been exposed to for more than a century. Currently, Los Angeles County METRO formerly known as the MTA, is attempting to expand the Eastside Gold Line with an Extension. This project is another example of the anti Mexican hate crimes that LACMETRO/MTA has perpetuated against our communities and others for years. There are violation of our human and civil right, and political corruption including mis appropriatuon of funds. Land use projects were approved by politicians who served on the LACMETRO/MTA board that are currently under indictement. Mark Ridley Thomas and Jose Huizar did not recuse themselves when voting on these projects. They also received campaign contributions from These entities. and did not disclose the relationship they had with them. It is unacceptable to allow for this extension project to be taken into consideration when so many issues continue to be ignored and have yet to be addressed or resolved with the Gold Line.

### Response to CO-4-1

The commenter's opposition to the Project is noted. The purpose of the Recirculated Draft EIR is to evaluate potential impacts of the Project on the physical environment as compared to baseline conditions. Pursuant to CEQA Guidelines Section 15125, to determine if a project would have significant physical impacts on the environment, a project's likely near-term and long-term impacts are compared to the existing physical environmental conditions that constitute the baseline. Accordingly, the Project's environmental impacts are analyzed as compared to the baseline, which is defined as being conditions in 2019, as indicated in Section 3.0.2.1 of the Recirculated Draft EIR, and disclosed in the Recirculated Draft EIR.

### Comment CO-4-2

This DEIR does not comply with CEQA. It left out all the environmental hazards that have resulted from the Exide exposure, Cogen Landfill, Maravilla and Montebello and other community dump repositories, also including gas and oil wells, incinerators, and all the other contaminating

facilities. Furthermore, the City of Los Angeles voted to build all contaminated facility on the Eastside back in the 1930's. We are surrounded by the East LA Interchange, one of the largest freeway intersections in the country. We are also surrounded by the Railroads and other major throughways.

The proposed project consists of a subway, stations, storage and workstations. The subway will go 50 feet underground and will cross all along the contaminated region.

**Response to CO-4-2**

A Draft Final Initial Site Assessment (ISA) Report was prepared for the Project (see Attachment A of Appendix I of the Recirculated Draft EIR). For preparation of the ISA, an Environmental Data Resources Inc (EDR) database search was conducted for listings within the appropriate American Society for Testing and Materials (ASTM) minimum search distance of the Project. EDR utilizes a geographical information system to plot the locations of reported spills, leaks, and incidents, and this information establishes if properties within, or near the Project area have the to affect the Project. The ISA also includes a review of standard historical sources including aerial photographs, topographic maps, and Sanborn Fire Insurance Maps to supplement regulatory agency database records. In addition, a review of the U.S. Department of Transportation (USDOT) National Pipeline Mapping System online database and the State of California Department of Conservation, California Geologic Energy Management Division Well Finder online database was conducted during preparation of the ISA. Furthermore, a search was conducted of publicly available databases maintained under Public Resources Code Section 65962.5 (i.e., the Cortese List) to determine whether any known hazardous materials are present in the DSA.

The Recirculated Draft EIR Section 3.8, revised in the Final EIR, provides a thorough and comprehensive description of existing hazardous materials conditions and the potential for hazardous materials to create a significant hazard to the public or the environment. As identified in Section 3.8.5.2, 30 properties in the resource study area for hazardous materials have documented releases. The affected properties are listed in Table 3.8-1 on pages 3.8-9 through 3.8-17 and depicted graphically on Figure 3.8.3 on page 3.8-18 of the Recirculated Draft EIR. As described throughout Section 3.8.2 of the Recirculated Draft EIR, there is an established, comprehensive federal, state, regional, and local framework independent of the CEQA process that is intended to reduce the risks associated with the use, transport, and disposal of hazardous materials, and Metro would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases (see Attachment A of Appendix I of the Recirculated Draft EIR for further discussion of the regulatory framework applicable to hazards and hazardous materials).

An additional 98 properties were identified that may have potential subsurface contamination from undocumented releases associated with current and/or historical uses of the properties (e.g., former railroad corridors, former gas stations, former dry cleaners, or former industrial properties). The location of these 98 additional properties is provided in Attachment A of Appendix I of the Recirculated Draft EIR. Mitigation measures to address the potential for encountering contamination of soils or groundwater during construction are MM HAZ-1 through MM HAZ-4, discussed on pages 3.8-69 and 3.8-70 of the Recirculated Draft EIR and revised in the Final EIR; revisions to MM HAZ-1 are further discussed in Response to Comment A-11-20. These measures establish a protocol for construction by which the aforementioned requisite federal, state, regional, and local hazardous materials risk reduction framework be implemented for properties with potential, undocumented releases of hazardous materials.

With the application of these mitigation measures, construction of each alternative would have a less than significant impact related to the creation of significant hazards to the public, including children and schools, through transportation, storage, use, and disposal of hazardous materials. These mitigative safeguards and federal, state, regional, and local risk reduction frameworks against hazardous material exposure would result in a less than significant impact relative to hazardous materials and would therefore not be expected to meaningfully contribute to the human health risks associated with construction, analyzed in Section 3.2.6.5 of the Recirculated Draft EIR.

### Comment CO-4-3

It will also cross the San Gabriel River, streams and flood channels/dams. This proposed project will negatively impact the biodiversity around the river and streams along the path.

### Response to CO-4-3

The commenter states that the Project would adversely impact biodiversity near and within the Rio Hondo and San Gabriel River. However, this is not the case because, as detailed in Section 3.3 of the Recirculated Draft EIR, operation and construction of Alternative 1, which crosses the Rio Hondo, Rio Hondo Spreading Grounds, and San Gabriel River, would have less than significant impacts on biological resources with implementation of mitigation measures. Biological mitigation measures are provided in Section 3.3.7.2 of the Recirculated Draft EIR and revised in the Final EIR. See Section 3.3.8 for a summary of impacts on biological resources after mitigation.

### Comment CO-4-4

During the Gold Line construction our burial grounds were desecrated even though we objected to and shared our concerns and knowledge of the territory and provided an alternative. The DEIR discusses once again that human remains will be unearthed. The determination that these impacts would be less than significant once again, exposes the violent racist description LACMETRO/MTA holds against our communities. The generational trauma that this has caused our community is unrepairable. The potential unearthing of human remains also poses extreme danger to workers and to the community at large. Serious life threatening illnesses remain in the bones of our ancestors. Ancient burial grounds and grave pits, that resulted from the U.S. War with Mexico (or the genocide) of aboriginal indigenous peoples, included humans classified as slaves due to conquest and manifest destiny. These remains or sacred burial items should not be touched or placed in a museum as the DEIR proposes.

### Response to CO-4-4

As explained in Section 3.4, Cultural Resources, and Section 3.15, Tribal Cultural Resources, of the Recirculated Draft EIR, it is not anticipated that human remains will be uncovered. However, the potential exists that it could occur. As presented in Section 3.4.7, the mitigation measure to address the Unanticipated Discovery of Human Remains is MM CUL-9 on page 3.4-53 of the Recirculated Draft EIR. MM CUL-9 conforms to Public Resources Code (PRC) Section 5097.98 and CEQA Guidelines Section 15064.5. Also see MM TCR-3 in Section 3.15.7, which specifies that if any uncovered cultural resources are Native American in origin and may also be Tribal Cultural Resources, treatment and curation of these resources shall be determined in consultation with the Native American monitor. As stated therein, 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. MM CUL-9 and MM TCR-3 have been revised in the Final EIR for clarification.

### Comment CO-4-5

The proposed subway also poses another problem. Since we are expected to have another hundred year flood these plans jeopardize the river, streams, as well as the flood channels, dams, and communities along its path.

### Response to CO-4-5

Alternative 1 would involve construction across the Rio Hondo, Rio Hondo Spreading Grounds, and San Gabriel River, which are within the 100-year and 500-year floodplain, as discussed in Section 3.9.5.5.1 and shown in Figure 3.9.3 of the Recirculated Draft EIR. As discussed in Section 3.9.6.3, the Washington Boulevard bridges over these waterways would be demolished and replaced with new bridges that carry both the LRT facility and the roadway. Although the replacement bridge piers would be larger than the existing bridge piers, implementation of MM HWQ-2, which would require compensatory flood storage to be provided as discussed in Section 3.9.7 of the Recirculated Draft EIR and revised in the Final EIR (see Response to Comment A-3-4), would reduce impacts on flood flows to less than significant. The potential slight increase in the size of the bridge piers would not impede or redirect flood flows because compensatory mitigation would allow flood waters to flow freely into and out of the storage area in a similar manner as pre-Project conditions. Therefore, operation and construction of Alternative 1 would not impede or redirect flood flows and impacts would be less than significant.

### Comment CO-4-6

The proposed subway is in the geographical region of the San Andres and Whittier Fault Lines. A major earthquake will jeopardize the health and safety of our communities. There is the possibility that after a large earthquake a massive explosion may occur. We testified at meetings requesting information including maps of fault lines, dumps, gas lines, and oil wells, that were in the path and all along the region of the subway. This information was never provided.

### Response to CO-4-6

Section 3.6, Geology, Soils, and Paleontological Resources, in the Recirculated Draft EIR provides a detailed description of existing seismic hazards and Figure 3.6.2 shows regional fault lines within the General study area (GSA). Then, the Recirculated Draft EIR analyzes the potential seismic hazard impact based on seismic conditions and project design. Section 3.6.7 further describes project measure PM GEO-1 that would be implemented regarding seismic design standards and compliance measures. The analysis concludes that the project would have a less than significant impact relative to GEO-1, Exposure to Seismic Hazards.

In addition, Section 3.8, Hazards and Hazardous Materials of the Recirculated Draft EIR, revised in the Final EIR, provides a detailed discussion of existing subsurface gas conditions (see Section 3.8.5.6), oil and gas wells (see Section 3.8.5.6 and Figure 3.8.4), petroleum and natural gas pipelines (see Section 3.8.5.7 and Figure 3.8.4), and properties with documented releases (see Table 3.8-1 and Figure 3.8.3).

### Comment CO-4-7

We also requested CDC information that would show the cancer clusters and all the other health issues we are suffering from in the area and this was also never provided. Furthermore, DTSC recently admitted publicly that they are following through on a failed remediiation plan as it relates to the Exide cleanup. To this day DTSC has done nothing to change the way they are remediating the cleaning up. They have failed to remove the contamination from the region which is all along

the subway pathway. The following is taken from the following article. https://capitalandmain.com/california-quietly-stored-500000-pounds-of-contaminated-soil-in-jurupa-valley-then-residents-found-out "Four years, thousands of soil samples and paint chips taken from homes, schools, parks and parkways near the former Exide battery facility have been stored inside shipping containers at a Superfund site. Without consulting local officials or residents, California's Department of Toxic Substances Control transported the samples to the Stringfellow facility, an Inland Empire quarry that once served as an industrial dumping ground — one that leaked toxic chemicals into groundwater and soil over several decades." The DTSC transported hazardous waste from a predominantly Mexican and Mexican American community into another one without notice; this is unacceptable! Although we refer to Mexican and Mexican Americans, all other ethnic groups that live in the contaminated region are also significantly impacted. This proposed subway will endanger the lives of people and all life forms in the region. We are concerned that we will be actively exposed to carcinogenic chemicals, led, arsenic, benzine, cadmium haxalavent chromium 6, methane, xylene, toluene, and VOCs that combine with another industrial pollutant, nitrogen oxide, in sunlight to form ozone.

### Response to CO-4-7

The commenter's statements regarding the actions of the California Department of Toxic Substances Control (DTSC) does not pertain the Recirculated Draft EIR or to the Project. See Response to Comment CO-4-2 that discusses hazardous sites identified in the Project vicinity and mitigation measures to reduce associated risks to less than significant, and see Response to Comment CO-4-10 that addresses human health risk relative to Project emissions. See also Response to Comment CO-4-1, which explains that the Project's environmental impacts are analyzed as compared to the baseline, as indicated in Section 3.0.2.1 of the Recirculated Draft EIR.

### Comment CO-4-8

The DEIR did not contain clear and detailed discussion of impact significance determinations, and in particular it has to explain the nature and magnitude of significant impacts.

The DEIR failed to include analysis that correlated the project's soil, air, and water pollutants and air emissions that will continue to impact our health. It lacks analysis and omits discussing the magnitude of the impacts.

### Response to CO-4-8

The determination of significance for the Build Alternatives for each resource area is addressed in Section 3.1 through 3.19 in the subsection 7, Impact Evaluation and in more detail in Section 7 of Appendices B through Appendix O. Pursuant to Section 15126.2 of the CEQA Guidelines, the focus is on the significant effects of the Project. In compliance with Section 15126.2 of the CEQA Guidelines, direct and indirect significant effects of the Project on the environment are clearly identified and described for both short-term (construction) and long-term (operations).

Risks to public health and the environment are assessed in the Recirculated Draft EIR and have been determined to be less than significant (air pollutants) or less than significant with mitigation (soil contamination and water quality). Analysis of these impacts is provided in Section 3.1, Air Quality, and Appendix C; Section 3.8, Hazards and Hazardous Materials, and Appendix I (as revised in the Final EIR); and Section 3.8, Hydrology and Water Quality and Appendix J of the Recirculated Draft EIR (as revised in the Final EIR), respectively.

## Comment CO-4-9

The DEIR fails to comport with its intended function. The fact remains that this DEIR was conducted during a pandemic. It failed to include the public. The community did not participate in the preparation of the DEIR. To exclude the people specifically, those considered meaningful who are currently diagnosed with cancer and other illnesses raises serious concerns with the legality of this DEIR and its false content.

## Response to CO-4-9

The commenter's statement that the Recirculated Draft EIR does not meet its intended function is incorrect. The Recirculated Draft EIR has been prepared consistent with CEQA (Public Resources Code Section 21000 *et seq.*). This includes compliance with the primary purpose of CEQA to inform government decision-makers and the public of the environmental effects of a proposed activity and to avoid or reduce significant impacts of the activity when feasible to do so. Pursuant to this primary purpose, the Recirculated Draft EIR identifies project impacts for three Build Alternatives and a No Project Alternative. Where impacts of the Build Alternatives have been determined to be significant, the Recirculated Draft EIR identifies mitigation measures design to reduce or avoid such impacts.

The commenter's suggestion that people were excluded from participating in the Recirculated Draft EIR is also incorrect. Public agencies and members of the public have had the opportunity to provide input on the content of the Recirculated Draft EIR consistent with CEQA requirements. Pursuant to CEQA Guidelines Section 15082 and 15083, scoping for the Project was conducted to provide agencies and the public the opportunity to assist in identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the Recirculated Draft EIR. The scoping process included six scoping meetings held in June 2019, prior to the COVID pandemic, to receive public input. The scoping process is described in Section 6.3.4 in Chapter 6, Public Outreach, and a Scoping Summary Report is provided in Attachment C and D of Appendix A of the Recirculated Draft EIR. Additional outreach events and activities conducted for the Project are also described in Chapter 6 and documented in Appendix A. Public input on the Recirculated Draft EIR was also solicited during a 60-day public comment period that included four public hearings to give agencies and members of the public the opportunity to review the document and provide comment. To facilitate this effort, the Recirculated Draft EIR was made available both on-line and at libraries for in-person and remote access. Similarly, the public hearings include both in-person events and a virtual event to provide for maximum access and accommodate health concerns related to COVID-19 pandemic. The public comments received and responses to those comments are part of the Final EIR and will be taken into consideration by the Metro Board of Directors when considering certification of the Final EIR.

The commenter states that the EIR has false content, but does not provide any specific information in support of that assertion.

## Comment CO-4-10

Our communities know first hand what the impacts are because our family members have died and we are currently sick from toxic long term exposure of so many pollutants. For the report to describe the impacts as less than significant is not only false but a premeditated act of murder and genocide. The toxic exposure exceeds the threshold therefore, the DEIR does not provide evidence to show the level of pollutant reduction and how that would reduce the adverse health effects.

The determination whether a discussion is sufficient is not solely a matter of discerning whether there is substantial evidence to support the agency's factual conclusions. Applying these principles, we claim the DEIR failed to adequately inform the public about the health effects of the project's significant air, soil, and water pollution impacts. We deem the exposure of the pollutants to be extremely significant and this will cause unavoidable health and environmental impacts.

The DEIR also contained a discussion, general in nature, about the health effects associated with the project. However, because the DEIR's discussion of health effects failed to indicate the concentrations at which such pollutants would trigger the identified symptoms, we find the DEIR's discussion inadequate, and hold that a sufficient discussion of impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impacts.

The omission of materials in the DEIR's discussion are necessary for informed decision-making and to enable the public to understand and meaningfully consider the impacts of the project.

Therefore, we reject this DEIR from the project developer for additional information connecting emissions, soil, water and health effects could not be provided.

Given the current state of environmental science, and the lack of scientific data provided only supports our arguments to reject this proposal. The DEIR itself must explain why, in a manner reasonably calculated to inform the public of the scope of what is and is not yet known about the pojects impacts.

**Response to CO-4-10**

As described in the Response to Comment CO-4-1, to determine if a project would have significant physical impacts on the environment, a project's likely near-term and long-term impacts are compared to the existing physical environmental conditions that constitute the baseline. As discussed in Section 3.2.3.4 in Section 3.2, Air Quality, of the Recirculated Draft EIR, health risk assessments (HRA) conducted to accompany a CEQA air quality analysis are performed to identify the short and long term health effects of project activities on local sensitive receptors. The process does not require nor imply that projects must evaluate or reduce existing human health impacts in the project area. Nonetheless, as discussed in Section 3.2.6.5 of the Recirculated Draft EIR, operation of the Project would result in long term reductions to existing toxic air contaminants (TAC) concentrations to which local sensitive receptors are exposed, including the primary Project related TAC of concern – diesel particulate matter (a carcinogenic compound emitted to the air through diesel vehicle exhaust). These reductions would be driven by the reduction to passenger vehicle operations in the Project area.

Further, as described in Section 3.2.6.5 of the Recirculated Draft EIR, construction of the Project would not result in the short-term release of TAC that would cause a substantial increase in human health risk. Tables 3.2-18, 3.2-19, and 3.2-20 present the hazard indices, calculated consistent with South Coast Air Quality Management District (SCAQMD) screening methodologies, for short term (acute 1-hour, chronic 8-hour, and chronic annual) health hazards. As indicated in footnote 2 to each of these tables, to ensure a conservative assessment, the calculated hazard indices are presented as summations accounting for the combined health effects across all affected organ systems in a maximally exposed receptor; these hazard indices are not evaluated for individual symptoms across any single given organ group. As shown, all hazard indices would be below the Tier 2 Risk Thresholds established by SCAQMD. These hazard index thresholds are developed by SCAQMD to be protective of the most sensitive individuals of a

population. Project hazard indices below the thresholds indicate that adverse human health impacts would not be expected. Calculations detailing the development of the SCAQMD screening tool inputs are available in Attachment B to Appendix C of the Recirculated Draft EIR.

Similarly, the Project would not result in impacts to soil or water that could result in a human health risk as discussed in Section 3.8, Hazards and Hazardous Materials, and Section 3.8, Hydrology and Water Quality, of the Recirculated Draft EIR and revised in the Final EIR. See also Response to Comment CO-4-8 regarding the Recirculated Draft EIR's consideration of risks associated with air emissions, soil contamination, and water quality.

In summary, the information provided in the Recirculated Draft EIR is sufficient to inform the public and decision makers of the Project's impacts, which meets the requirements of CEQA. Further evaluation or data is neither required nor warranted.

### Comment CO-4-11

Our communties are supposed to be protected by the Clean Water Act of 1972. Yet the USEPA, California State Water Control Resource Board, Regional Water Control Board, California Air Resorce Board, AQMD, CDC, and Public Health Department have failed to effectively implement pollutant control measures or implement significant educational and health programs for our communities. No type of health plan or medical treatment plan has been designed to deal with these catastrophic environmental disasters. This project will exacerbate the pollution in our aquifers and negatively impact the biodiversity of the soil. This will also impact to the natural hydrological cycle system of the atmosphere and impact the precipitation during an already prolonged drought.

### Response to CO-4-11

The commenter's statement that agencies have failed to effectively implement pollutant control measures or programs based on environmental laws does not pertain the Recirculated Draft EIR. Further, see Response to Comment CO-4-1, which explains that the Project's environmental impacts are analyzed as compared to the baseline, as indicated in Section 3.0.2.1 of the Recirculated Draft EIR.

The commenter states that the Project would exacerbate the pollution in aquifers. However, this is not accurate. Per Section 3.9.6.1 of the Recirculated Draft EIR, water quality impacts on groundwater from operation of the Project would be less than significant and impacts from construction the Project would be less than significant with implementation of mitigation measures MM HAZ-2 and MM HAZ-3. MM HAZ-2, discussed in Section 3.9.7.2, includes requiring the preparation of a Soil and Groundwater Management Plan in consultation with the Los Angeles Regional Water Quality Control Board (LARWQCB) and other appropriate regulatory agencies. The plan would identify and delineate contaminated areas; provide procedures for handling, excavating, and managing excavated soils and dewatering effluent and for notifying appropriate agencies; and provide requirements for site-specific safety manuals and construction work plans. MM HAZ-3, discussed in Section 3.9.7.2, requires contractors to inspect groundwater for signs of contamination, and if contaminated groundwater is found, halt work and test materials, and develop an investigation and site-specific groundwater management plan to ensure contaminants are not spread. As concluded in Section 3.18, Cumulative Impacts, subsection 3.18.6.8, of the Recirculated Draft EIR, the Project would not result in significant cumulative impacts with respect to hazards and hazardous materials.

The commenter states that the Project would negatively impact the biodiversity of the soil. However, this assertion is not accurate. As detailed in Section 3.3, operation and construction of the Project would have less than significant impacts on biological resources. As noted in Section 3.3.5 of the Recirculated Draft EIR, the majority of the land within the Project vicinity is highly developed and covered with impervious surfaces such as parking lots and buildings. The only natural areas occur where Alternative 1 crosses the Rio Hondo, Rio Hondo Spreading Grounds, and the San Gabriel River. Construction of Alternative 1 could increase erosion and sedimentation around proposed construction and staging areas, particularly in these natural areas. As discussed in Section 3.9.6.3.1, to reduce potential impacts related to erosion and siltation, the Project would comply with California State Water Resource Control Board's National Pollutant Discharge Elimination System (NPDES) Construction General Permit and the LARWQCB NPDES MS4 permit, which require measures to control erosion and sedimentation during construction. See project measure PM HWQ-1 and PM HWQ-2 in Section 3.9.7.1 of the Recirculated Draft EIR, as revised in the Final EIR, for more information about these erosion control measures. PM HWQ-2 has been revised in the Final EIR, as discussed in Response to Comment A-3-4. Thus, construction of the Project would have less than significant impacts related to erosion. Cumulative water quality impacts would also be less than significant with mitigation, as detailed in Section 3.18.6.9 of the Recirculated Draft EIR.

The commenter states that the Project would negatively impact the natural hydrological cycle system of the atmosphere and the precipitation during an already prolonged drought. As discussed in Section 3.7, operation and construction of the Project would have less than significant impacts from greenhouse gas emission generation. Thus, the Project would not affect climate or the atmosphere.

### Comment CO-4-12

The DEIR's determination that mitigation measures would "substantially" reduce air quality impacts (without reducing them to a less-than-significant level), holding that the DEIR contained no facts or analysis to support the "substantial" reduction characterization.

Therefore, the DEIR needs to be rejected or revised to provide evidence to show the level of pollutant reduction and how that would reduce the adverse health and environmental effects. We also want to make it clear that mitigation measures we claim are not invalid simply because the DEIR did not have the capability of fully having access to scientific data or that the agencies responsible for the protection and clean up of our communities have failed to provide the data or that they have not done the work expected of them.

### Response to CO-4-12

As identified in Section 3.2, Air Quality, of the Recirculated Draft EIR, no significant air quality impacts would occur under the Project and therefore, no mitigation measures are identified or required. Therefore, the premise of the comment is not valid and does not accurately reflect facts and conclusions of the Recirculated Draft EIR relative to air quality impacts.

Further, as described in Section 3.2.6.2, operation of the Project would reduce VMT and thereby result in a decrease in most regional criteria air pollutants. The modeling data and results used make the determination of less than significant impacts on air quality is provided in Attachments A through D in Appendix C of the Recirculated Draft EIR.

### Comment CO-4-13

The zone change and proposed subway will drastically expand the occupation and displacement of our communities and our businesses. This will further obliterate what was once known as the Eastside and the peoples in it.

### Response to CO-4-13

No zone change would occur as part of the Project. Metro values local business and is committed to reducing potential negative effects of the Project. To minimize those impacts, relocation assistance and benefits would be provided to displaced businesses in accordance with state and federal regulations and in accordance with Metro policies. In addition, as discussed in Section 3.10.6, Land Use and Planning, of the Recirculated Draft EIR, properties acquired may be available for joint development or parking facilities subject to standard planning and permitting review processes separate from this environmental review process. Property acquisition would be generally limited to properties currently zoned for commercial or industrial uses. The new uses would be consistent with existing commercial and industrial uses and the land use characteristics of the transportation corridor.

### Comment CO-4-14

The current census data being applied is racist it fails to properly count our community and it fails to adequately identify the ethnic background of those currently residing in the region. The income of this community is grossly misrepresented. Incomes are inflated by improperly adding or bundling the incomes from individuals living on parcels and not distinguishing multigeneration families, tenants, or units.

### Response to CO-4-14

In regard to the ethnic background of the community, see Response to Comment I-161-9. Table 3.12-4 on page 3.12-6 of the Recirculated Draft EIR and Table 6-4 on page 38 of Appendix M, Community and Neighborhoods Impacts Report have been revised to reflect a correction to show the percentage of the Hispanic or Latino population of any race as 89 percent. The commenter also asserts that the income figures shown in Table 3.12-4 on page 3.12-6 have been inflated and do not represent the community. However, this table provides the total population living in census tracts within a half-mile of stations that are below the poverty line. The data is sourced from the Census Bureau, who uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using the Consumer Price Index (CPI-U).

### Comment CO-4-15

We are proposing an alternative solution to address the transportation needs for those traveling through our communities via the Gold Line on Atlantic Blvd and Pomona Blvd, that instead of building a dangerous underground environmentally toxic subway extension that will cost an enormous amount of money and displace our homes and businesses. We are proposing that instead we add the Gold Streak Rapid Transit Route via bus. Where passengers from the Gold Line can transfer ontto a rapid cleaner smaller triple or double clean bus to arrive at their destination further east. This alternative proposal addresses the need for transportation from one area to the other. It will save an enormous amount of money. It will protect the integrity of our homes and business. It will prevent the toxic exposure that subway construction could release. It is a safer alternative because of the San Andreas and Whittier Fault Lines and it can prevent a potential explosion. This alternative will significantly lower the gigantic carbon footprint that a subway

would have had on our planet. This alternative plan can also happen much faster. Furthermore, if our alternative plan is accepted we believe this will aid in repairing the contentious relationship that exists between the eastside and LACMETRO/MTA. Por Mi Raza Habla Mi Espíritu!

### Response to CO-4-15

The commenter's opposition to the Project is noted. As stated in Section 5.1 of the Recirculated Draft EIR, Section 15126.6(a) of the CEQA Guidelines requires an EIR to describe the 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. Additionally, 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.

As discussed in Recirculated Draft EIR Appendix T, Alternatives Withdrawn from Further Evaluation, the evaluation and screening of concepts, engineering and environmental refinements, and decisions to withdraw alternatives from consideration has a long history in the development of the Project. For background information on the transit options that have been considered and evaluated for the region, including alternatives that included alternative routing and alternative modes. and that have led to the evolution and selection of the Project evaluated in the Recirculated Draft EIR, see the Eastside Transit Corridor Phase 2 Alternatives Analysis (AA) Report that was published in 2009. As described in Section 2.1 and Section 5.3 of the Recirculated Draft EIR, the AA process was completed in October 2009 and included preliminary, initial, final and conceptual engineering screening of concepts; the AA analysis is included in the Recirculated Draft EIR as Attachment A of Appendix T. The 2009 AA evaluated 47 conceptual alternatives and recommended four conceptual alternatives for further consideration. These initial concepts included various alternatives for light rail transit (LRT), bus rapid transit (BRT), bus improvements, and multi-modal improvements.

As summarized in Section 5.3 of the Recirculated Draft EIR, alternative routes and modes were dismissed from consideration for a variety of reasons, including conflicts with Southern California Edison facilities, parks and protected green spaces, Union Pacific railroad facilities and operations, environmentally sensitive land uses, low projected ridership levels, cost-effectiveness, and other considerations described in Table 5-1. Consequently, the Build Alternatives were evaluated in the Recirculated Draft EIR as the range of reasonable project alternatives which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen the significant effects of the Project.

See Responses to Comments CO-4-1 and CO-4-14 above, in response to the commenter's concerns related to hazards and hazardous materials and seismic risks.

## CO-5: East Los Angeles Chamber of Commerce

### Comment CO-5-1

Please receive this letter as a formal request for an extension of the EIR document draft, pertaining to the Metro Eastside Gold line extension. The East Los Angeles Chamber of Commerce has had a long working relationship with many community members; to mention one of them, Clara Solis. Clara's findings in the EIR substantiate that Metro are fast tracking the entire process. In addition, Metro Staff has ignored Community comments and concerns by failing to address them; this

behavior from Metro representatives will impact businesses and will only lead to an unsuccessful project. The East Los Angeles Chamber of Commerce has many impacted businesses from the original Eastside Gold Line on 3rd Street and now on Atlantic Boulevard / Pomona Boulevard. We strongly recommend and request an extension of the EIR draft and allow an additional 60 days or however long it takes for Metro to modify the errors and redistribute the document. It is not fair that residents and business owners are being confused by the Metro East Side Extension and the metro Area Plan, both are being confused.

### Response to CO-5-1

The request for an extension is assumed to refer to a request to extend the public review period of the Recirculated Draft EIR. The 60-day review period provided (June 30 through August 29) exceeded the CEQA requirements for a 45-day review period and therefore, no extension was made. Additionally, the 60-day review period, in excess of the 45-day requirement, also refutes the assertion that the Recirculated Draft EIR was "fast-tracked" as suggested by the commenter. The Recirculated Draft EIR is the recirculation of a Draft EIR that was originally prepared in 2014 based on the AA study which commenced in 2007. The Recirculated Draft EIR updates and refines the information and the alternatives addressed in the 2014 analysis. Additionally, the notice of preparation (NOP) for this Recirculated Draft EIR and public scoping period occurred in three years previously, in 2019, which also refutes the assertion that the Recirculated Draft EIR was fast-tracked. Further, from the time that the NOP was released to the release of the Recirculated Draft EIR, Metro has provided information to the public on the Project and expected public release date of the Recirculated Draft EIR. For additional information on the public scoping that occurred in 2019 and outreach provided to the public during the course of the preparation of EIR, see Chapter 6, Public Outreach, Appendix A, Notice of Preparation and 2019 Scoping Summary Report, and Appendix S, Public Outreach, of the Recirculated Draft EIR.

Regarding comments on Recirculated Draft EIR made by Clara Solis, see responses to submissions I-161, I-199, and I-203.

Regarding impacts to businesses, pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment. As a result, the Recirculated Draft EIR does not consider economic impacts as environmental impacts. The indirect environmental effects of the Project's social and economic impacts are assessed, as applicable, in the individual resource sections of the Recirculated Draft EIR. Metro values local business and is committed to reducing potential negative effects of the Project. Relocation assistance and benefits would be provided to displaced businesses in compliance with state regulations and Metro's policies.

Regarding the request for Metro to modify the errors and redistribute the document, the commenter does not provide evidence for errors that would result in need to recirculate the document as specified under Section 15088.5 of the CEQA Guidelines.

## CO-6: Whittier Boulevard Merchants Association

### Comment CO-6-1

My name is Tony DeMarco, I am president of the Whittier Boulevard Merchants Association of East Los Angeles, I am a property owner and business owner for over 23 years on Whittier Boulevard. Many of our members feel we are being ignored by Metro. We have so many concerns that have went unaddressed because Metro is in a hurry to pass this EIR without the real

stakeholders' comments. We as taxpayers deserve better representation than what we have now. Whittier Boulevard Merchants supports Clara's request in its entirety. It is a fact that 3rd Street got ruined by Metro, to the extent that Congresswoman Roybal Allard had Metro meet with us when this project began to promise the "3rd Street debacle" would never happen again. We should learn by those mistakes, slow the process down, get the impacted individuals input and let's do this project right this time for unincorporated East Los Angeles.

### Response to CO-6-1

The public comments received and responses to those comments are part of the Final EIR and will be taken into consideration by the Metro Board of Directors when considering certification of the Final EIR. For information on the public outreach and opportunities for public input that have occurred for the Project, see Chapter 6, Public Outreach, of the Recirculated Draft EIR. See also Response to Comment CO-2-1 and CO-4-9. Regarding comments on Recirculated Draft EIR made by Clara Solis, see responses to Comment Submissions I-161, I-199, and I-203.

## CO-7: Maravilla Community Advisory Committee

### Comment CO-7-1

On behalf of the Maravilla Community Advisory Committee (MCAC), we are reaching out to you today to express our support for the extension of the community comment period of the Extension for Gold Line Eastside Transit Corridor Draft EIR.

Our membership is made up of residents, homeowners, business owners and other community stakeholders in Unincorporated East LA, which will be impacted by the Gold Line Transit Corridor Project.

The community has expressed numerous concerns with this project and that the additional outreach efforts are necessary prior to proceeding:

- Additional notices sent to community residents and further opportunities for feedback. Many residents within impacted areas have reported not receiving notice of community meetings and members that have attended have reported insufficient time to be heard.

### Response to CO-7-1

See Response to Comment CO-5-1 regarding the request for an extension of the public comment period. For information on the public outreach that has occurred for the Project, see Chapter 6, Public Outreach, of the Recirculated Draft EIR. See also Responses to Comment CO-2-1 and CO-4-9.

### Comment CO-7-2

- Further analysis as to the impact to affected businesses as well as what supportive services will be provided.

### Response to CO-7-2

Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment. As a result, the Recirculated Draft EIR does not consider economic impacts as environmental impacts.

The indirect environmental effects of the Project's social and economic impacts are assessed, as applicable, in the individual resource sections of the Recirculated Draft EIR. Metro values local business and is committed to reducing potential negative effects of the Project. Relocation assistance and benefits would be provided to displaced businesses in compliance with state regulations and Metro's policies.

### Comment CO-7-3

- Added detail as to how concerns to the impact of gentrification, demography, rental rates and fresh food retailer availability will be addressed.

### Response to CO-7-3

As explained in Section 3.17.6.1 of the Recirculated Draft EIR, as a transit infrastructure project, The Project is not anticipated to directly foster growth since no housing would be constructed as part of the Project. The Project is designed to improve transit service to help accommodate the forecasted growth in the region's population and workforce. While housing development would not be directly induced by the Project, there would be opportunities where the Project could serve as a catalyst for economic revitalization and growth in areas where development has already occurred. Section 3.10, Land Use and Planning, and Appendix K identify that there may be opportunities within the project vicinity for joint development at station locations and other public/private transit-oriented development opportunities along the proposed alignment at properties proposed to be acquired for the Project. Additionally, as discussed in Section 3.12, Population and Housing, of the Recirculated Draft EIR, the Project would not result in substantial changes to the existing population of unincorporated Los Angeles. While it may encourage growth in surrounding areas, that growth would be contingent upon local city zoning regulations and approvals, which would consider a development's consistency with local general plans and transit-oriented development policies; therefore, any growth is anticipated to be consistent with local polices and requirements, and local growth projections. Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment.

### Comment CO-7-4

- More information on how traffic and parking impacts will be remediated including law enforcement budget allocations.

### Response to CO-7-4

As discussed in Section 3.14.6.2 of the Recirculated Draft EIR, construction or operation of the Project is not expected to lead to a substantial or measurable increase in vehicle travel. Project measures to accommodate light rail movements and traffic circulation during construction and operation are PM TRA-1 and PM TRA-2, discussed in Section 3.14.7.1 of the Recirculated Draft EIR. PM TRA-2 has been revised in the Final EIR (see Response to Comment A-5-1). Pursuant to SB 743, adequacy of parking is not a significant environmental impact under CEQA (see Pub. Resources Code, § 21099(b)(3)). Regarding budget allocations, pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment. As described in Section 2.5.1.2 of Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the Atlantic/Pomona station (relocated/reconfigured), and surface parking would be provided at each of the at-grade stations.

### Comment CO-7-5

This project will impact Unincorporated East Los Angeles for generations to come and it's vital that the community's concerns be sufficiently heard, understood and incorporated at this critical step in the process.

Additionally, we welcome you to attend one of our upcoming monthly meetings and provide additional information on the topic to the community, which are held on the first Tuesday of each month. Thank you for your consideration,

### Response to CO-7-5

For information on the public outreach and opportunities for public input that has occurred for the Project, see Chapter 6, Public Outreach, of the Recirculated Draft EIR. Thank you for your invitation to attend a meeting.

## CO-8: East Los Angeles Boyle Heights Coalition

### Comment CO-8-1

In East Los Angeles, Boyle Heights and beyond we claim genocide and ecocide! People in our communities have died and so have other life forms. Entire families in our neighborhoods are chronically sick. Children have been born with congenital health problems and families have suffered from spontaneous abortion and other reproductive issues. Our future generations along with the planet will forever be impacted by the long term environmental racism we have been exposed to for more than a century.

Currently, Los Angeles County METRO formerly known as the MTA, is attempting to expand the Eastside Gold Line with an Extension. This project is another example of the anti Mexican hate crimes that LACMETRO/MTA has perpetuated against our communities and others for years. There are violation of our human and civil right, and political corruption including mis appropriation of funds. Land use projects were approved by politicians who served on the LACMETRO/MTA board that are currently under indictment. Mark Ridley Thomas and Jose Huizar did not recuse themselves when voting on these projects. They also received campaign contributions from These entities. and did not disclose the relationship they had with them. It is unacceptable to allow for this extension project to be taken into consideration when so many issues continue to be ignored and have yet to be addressed or resolved with the Gold Line.

This DEIR does not comply with CEQA. It left out all the environmental hazards that have resulted from the Exide exposure, Cogen Landfill, Maravilla and Montebello and other community dump repositories, also including gas and oil wells, incinerators, and all the other contaminating facilities. Furthermore, the City of Los Angeles voted to build all contaminated facility on the Eastside back in the 1930's. We are surrounded by the East LA Interchange, one of the largest freeway intersections in the country. We are also surrounded by the Railroads and other major throughways.

The proposed project consists of a subway, stations, storage and workstations. The subway will go 50 feet underground and will cross all along the contaminated region. It will also cross the San Gabriel River, streams and flood channels/dams. This proposed project will negatively impact the biodiversity around the river and streams along the path.

During the Gold Line construction our burial grounds were desecrated even though we objected to and shared our concerns and knowledge of the territory and provided an alternative. The DEIR discusses once again that human remains will be unearthed. The determination that these impacts would be less than significant once again, exposes the violent racist description LACMETRO/MTA holds against our communities. The generational trauma that this has caused our community is unrepairable. The potential unearthing of human remains also poses extreme danger to workers and to the community at large. Serious life threatening illnesses remain in the bones of our ancestors. Ancient burial grounds and grave pits, that resulted from the U.S. War with Mexico (or the genocide) of aboriginal indigenous peoples, included humans classified as slaves due to conquest and manifest destiny. These remains or sacred burial items should not be touched or placed in a museum as the DEIR proposes.

The proposed subway also poses another problem. Since we are expected to have another hundred year flood these plans jeopardize the river, streams, as well as the flood channels, dams, and communities along its path.

The proposed subway is in the geographical region of the San Andres and Whittier Fault Lines. A major earthquake will jeopardize the health and safety of our communities. There is the possibility that after a large earthquake a massive explosion may occur. We testified at meetings requesting information including maps of fault lines, dumps, gas lines, and oil wells, that were in the path and all along the region of the subway. This information was never provided. We also requested CDC information that would show the cancer clusters and all the other health issues we are suffering from in the area and this was also never provided.

Furthermore, DTSC recently admitted publicly that they are following through on a failed remediiation plan as it relates to the Exide cleanup. To this day DTSC has done nothing to change the way they are remediating the cleaning up. They have failed to remove the contamination from the region which is all along the subway pathway. The following is taken from the following article.

https://capitalandmain.com/california-quietly-stored-500000-pounds-of-contaminated-soil-in-jurupa-valley-then-residents-found-out

“Four years, thousands of soil samples and paint chips taken from homes, schools, parks and parkways near the former Exide battery facility have been stored inside shipping containers at a Superfund site. Without consulting local officials or residents, California’s Department of Toxic Substances Control transported the samples to the Stringfellow facility, an Inland Empire quarry that once served as an industrial dumping ground — one that leaked toxic chemicals into groundwater and soil over several decades.”

The DTSC transported hazardous waste from a predominantly Mexican and Mexican American community into another one without notice; this is unacceptable! Although we refer to Mexican and Mexican Americans, all other ethnic groups that live in the contaminated region are also significantly impacted.

This proposed subway will endanger the lives of people and all life forms in the region. We are concerned that we will be actively exposed to carcinogenic chemicals, led, arsenic, benzine, cadmium haxalavent chromium 6, methane, xylene, toluene, and VOCs that combine with another industrial pollutant, nitrogen oxide, in sunlight to form ozone.

The DEIR did not contain clear and detailed discussion of impact significance determinations, and in particular it has to explain the nature and magnitude of significant impacts.

The DEIR failed to include analysis that correlated the project's soil, air, and water pollutants and air emissions that will continue to impact our health. It lacks analysis and omits discussing the magnitude of the impacts. The DEIR fails to comport with its intended function. The fact remains that this DEIR was conducted during a pandemic. It failed to include the public. The community did not participate in the preparation of the DEIR. To exclude the people specifically, those considered meaningful who are currently diagnosed with cancer and other illnesses raises serious concerns with the legality of this DEIR and its false content.

Our communities know first hand what the impacts are because our family members have died and we are currently sick from toxic long term exposure of so many pollutants. For the report to describe the impacts as less than significant is not only false but a premeditated act of murder and genocide. The toxic exposure exceeds the threshold therefore, the DEIR does not provide evidence to show the level of pollutant reduction and how that would reduce the adverse health effects.

The determination whether a discussion is sufficient is not solely a matter of discerning whether there is substantial evidence to support the agency's factual conclusions. Applying these principles, we claim the DEIR failed to adequately inform the public about the health effects of the project's significant air, soil, and water pollution impacts. We deem the exposure of the pollutants to be extremely significant and this will cause unavoidable health and environmental impacts.

The DEIR also contained a discussion, general in nature, about the health effects associated with the project. However, because the DEIR's discussion of health effects failed to indicate the concentrations at which such pollutants would trigger the identified symptoms, we find the DEIR's discussion inadequate, and hold that a sufficient discussion of impacts requires not merely a determination of whether an impact is significant, but some effort to explain the nature and magnitude of the impacts.

The omission of materials in the DEIR's discussion are necessary for informed decision-making and to enable the public to understand and meaningfully consider the impacts of the project.

Therefore, we reject this DEIR from the project developer for additional information connecting emissions, soil, water and health effects could not be provided.

Given the current state of environmental science, and the lack of scientific data provided only supports our arguments to reject this proposal. The DEIR itself must explain why, in a manner reasonably calculated to inform the public of the scope of what is and is not yet known about the projects impacts.

Our communities are supposed to be protected by the Clean Water Act of 1972. Yet the USEPA, California State Water Control Resource Board, Regional Water Control Board, California Air Resource Board, AQMD, CDC, and Public Health Department have failed to effectively implement pollutant control measures or implement significant educational and health programs for our communities. No type of health plan or medical treatment plan has been designed to deal with these catastrophic environmental disasters. This project will exacerbate the pollution in our aquifers and negatively impact the biodiversity of the soil. This will also impact to the natural hydrological cycle system of the atmosphere and impact the precipitation during an already prolonged drought.

The DEIR's determination that mitigation measures would "substantially" reduce air quality impacts (without reducing them to a less-than-significant level), holding that the DEIR contained no facts or analysis to support the "substantial" reduction characterization.

Therefore, the DEIR needs to be rejected or revised to provide evidence to show the level of pollutant reduction and how that would reduce the adverse health and environmental effects. We also want to make it clear that mitigation measures we claim are not invalid simply because the DEIR did not have the capability of fully having access to scientific data or that the agencies responsible for the protection and clean up of our communities have failed to provide the data or that they have not done the work expected of them.

The zone change and proposed subway will drastically expand the occupation and displacement of our communities and our businesses. This will further obliterate what was once known as the Eastside and the peoples in it.

The current census data being applied is racist it fails to properly count our community and it fails to adequately identify the ethnic background of those currently residing in the region. The income of this community is grossly misrepresented. Incomes are inflated by improperly adding or bundling the incomes from individuals living on parcels and not distinguishing multigenerational families, tenants, or units.

We are proposing an alternative solution to address the transportation needs for those traveling through our communities via the Gold Line on Atlantic Blvd and Pomona Blvd, that instead of building a dangerous underground environmentally toxic subway extension that will cost an enormous amount of money and displace our homes and businesses. We are proposing that instead we add the Gold Streak Rapid Transit Route via bus. Where passengers from the Gold Line can transfer on to a rapid cleaner smaller triple or double clean bus to arrive at their destination further east.

This alternative proposal addresses the need for transportation from one area to the other. It will save an enormous amount of money. It will protect the integrity of our homes and business. It will prevent the toxic exposure that subway construction could release. It is a safer alternative because of the San Andreas and Whittier Fault Lines and it can prevent a potential explosion.

This alternative will significantly lower the gigantic carbon footprint that a subway would have had on our planet. This alternative plan can also happen much faster. Furthermore, if our alternative plan is accepted we believe this will aid in repairing the contentious relationship that exists between the eastside and LACMETRO/MTA.

Por Mi Raza Habla Mi Espíritu!

### Response to CO-8-1

Comment submission CO-8-1 is identical to Comment Submission CO-4. See Responses to Comments CO-4-1 through CO-4-15.

## CO-9: East Los Angeles Coalition

### Comment CO-9-1

Hello everyone my name is Eddie Torres I'm the co-founder of the East Los Angeles coalition, immediate past president of the East Los Angeles Chamber of Commerce. Lifelong resident and property owner in east Los Angeles also will be impacted as a East Los Angeles resident by the upcoming Construction for the East Side gold Lane Extension. We agree that there needs to be an extension and a redistribution of the environmental impact report it is severely flawed does not

address East Los Angeles as it should be addressed as an underserved minority economically disadvantaged community.

### Response to CO-9-1

The commenter's opposition to the Project is noted. See Response to Comment CO-5-1 regarding the request for an extension of the public comment period. The commenter does not provide evidence for flaws that would result in need to recirculate the document as specified under Section 15088.5 of the CEQA Guidelines.

### Comment CO-9-2

Also at the public hearing at Kaiser Permanente July 21st 2022 I attended there was only seven or eight individuals the publicly spoke all only three of them were residents of East Los Angeles but every single person other than those three spoke against the Metro Light Rail there must have been about 15 and I'm being generous attendees there was more Metro Staff than there was attendees. Also I believe was March 2022 East Los Angeles residents at a community outreach meeting were cut off from being able to give their public comments even though they waited for over 45 minutes to an hour. Metro should have made up that meeting.

### Response to CO-9-2

See Chapter 6, Public Outreach, of the Recirculated Draft EIR regarding the public outreach and opportunities/methods for the public to provide input on the Project. See also Response to Comment CO-2-1 and CO-4-9.

### Comment CO-9-3

As an East Los Angeles resident and also representing businesses as a former Metro review advisory committee executive member for the East Side goal line extension 3rd Street project we are very let down by Metro's lack of consideration for East Los Angeles. Metro's process is flawed also I would ask everybody to support and demand that this project has a resident/ business Review advisory committee of impacted individuals I recommend and request that the East Los Angeles Chamber of Commerce and the Whittier Boulevard Merchant Association are allowed to appoint someone to represent them also the East Los Angeles coalition would request the same since we have residence and business owners that will be impacted.

### Response to CO-9-3

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

## CO-10: Whittier Area Chamber of Commerce

### Comment CO-10-1

Good evening. My name is R.D. McDonald, 90605. I am here speaking on behalf of the Whittier Area Chamber of Commerce, representing over 500 businesses in the Whittier area. Dating back to 2010, when this project was first proposed, the Whittier chamber along with the Chamber Alliance, which represents seven chambers throughout the region that's affected by the proposed line -- we support the Alternative 1, the Washington Boulevard extension all the way to the Lambert and Washington Boulevard intersection.

### Response to CO-10-1

The commenter's support for Alternative 1 is noted.

### Comment CO-10-2

I'd like to thank the project team for a very thorough presentation and having reviewed portions of the draft EIR -- I haven't gotten through all of it just yet, but the depth of experience and the expertise of the team members not only has been reflected in your thorough presentation this evening, but also through the EIR. We feel that the environmental -- following the CEQA regulations, the significant and unavoidable impacts, that appropriate mitigation measures are being considered, both the short-term impacts during the construction phase, as well as the long-term impacts during operations – that appropriate mitigation measures are being considered. And thank you.

### Response to CO-10-2

Comment noted.

## CO-11: Washington Blvd Light Rail Transit Coalition

### Comment CO-11-1

The five incorporated cities along the nine-mile Eastside Transit Corridor have advocated for years for Metro's planned Eastside Extension. Thank you for the opportunity to comment on the draft Environmental Impact Report. The Coalition strongly advocates for the full nine-mile extension of the project, from its current terminus at Atlantic Station in the unincorporated area of East Los Angeles to eastern Los Angeles County and ending in the City of Whittier. As a Coalition we are well-positioned to help Metro advocate for state and federal funding so that this project can be completed in a timely manner.

### Response to CO-11-1

The commenter's support for Alternative 1 is noted.

### Comment CO-11-2

According to the Draft EIR, Alternative 3 was identified as the most environmentally superior. However, after careful review, the DEIR clearly illustrates that Alternative 1 reduces more Vehicles Miles Traveled (VMT), more Greenhouse Gas (GHG) emissions, and results in more British Thermal Units (BTU) of saved energy throughout the region. As such, Alternative 1 offers the greatest environmental benefits in the region and far surpasses Alternative 3 from an environmental standpoint. Furthermore, Alternative 1 allows all cities in the corridor to advance their respective General Plans sooner than later, which further enhances secondary environmental benefits stemming from multimodal transit connections and corridor-adjacent transit-oriented development including affordable housing. Considering these facts, the Washington Boulevard Coalition would like to implore that Metro select Alternative 1 as the locally preferred alternative to ensure greater environmental benefits sooner.

### Response to CO-11-2

See Response to Comment A-8-6 regarding the selection of the environmentally superior alternative.

**Comment CO-11-3**

We are looking forward to continuing to advocate for the Project on a timeline that brings the Eastside Extension to completion in 2035, as directed by the Metro Board and as expected by the public when they approved Measure M in 2016.

**Response to CO-11-3**

Comment noted.

# 4.3.2.3 Businesses

## B-1: A TORRES TUXEDOS

**Comment B-1-1**

We dont see any restroms in the plans of the extension , people will go around the business or sometimes even urinate in front of the business.

**Response to B-1-1**

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

## B-2: GFC Atlantic Associates, LLC

**Comment B-2-1**

The purpose of this letter is to voice our strong objection to the Eastside Transit Corridor Phase 2 expansion project. We believe there are numerous impacts beyond Metro's awareness, which include the suffering of the silent and the incalculable damages from the second and third-degree consequences of Metro expansions. Minority business owners (like ourselves) are less likely to know how or have the resources to navigate the complex political environments to seek restitution for damages caused to us by Metro expansion projects.

**Response to B-2-1**

The commenter's opposition to the Project is noted. See Responses B-2-2 and B-2-14 below.

**Comment B-2-2**

We believe a large proportion of damages inflicted on minorities and their small businesses have been overlooked and will continue to be overlooked by Metro. We, along with all the shop tenants are each minority-owned small businesses, and we have all already been significantly impacted by the previous Metro expansion, Atlantic Station, that was constructed on Pomona Blvd. around 2010. Atlantic Station is directly across the street from our property, located at 271-289 S. Atlantic Blvd., in East Los Angeles, CA

**Response to B-2-2**

Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment. As a

result, the Recirculated Draft EIR does not consider economic impacts as environmental impacts. The indirect environmental effects of the Project's social and economic impacts are assessed, as applicable, in the individual resource sections of the Recirculated Draft EIR. Metro values local business and is committed to reducing potential negative effects of the Project. See also Response to Comment A-8-21 and B-2-9 below.

### Comment B-2-3

Our property lost significant visibility from southbound traffic on Atlantic Blvd a·nd westbound traffic on Pomona Blvd., which negatively affected our small business tenants (most minority owned).

### Response to B-2-3

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment B-2-4

In the years to follow, we've had tenants who were put out of business and our property saw its lowest occupancy in the last decade of 74% in 2012, which was a direct result from Atlantic Station beginning its operations.

### Response to B-2-4

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment B-2-5

If the Metro Station had any positive contribution to our tenant businesses, we believe some of these benefits would have translated to increasing rents. Unfortunately, this is not the case. Our property never recovered to pre-2007 rents. Our 2022 base rents are down 20.79% from 2007, despite 90% occupancy. See Exhibit A. *[See the original Comment Submission B-2 located in Appendix A of the Final EIR for the referenced Exhibit A]*

### Response to B-2-5

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment B-2-6

Is Metro even aware of the challenges we've endured? We would guess not. We've received zero dollars in compensation or relief for this negative impact from the Atlantic Station expansion. Clearly the damages we've absorbed were either not anticipated in Metro's impact studies or Metro grossly underestimated the projects impacts to minorities prior to construction. We're probably not the only property owner and business adversely affected this way. Similar negative impacts have likely been replicated all the way through the path of this Metro expansion.

### Response to B-2-6

Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment. As a

result, the Recirculated Draft EIR does not consider economic impacts as environmental impacts. The indirect environmental effects of the Project's social and economic impacts are assessed, as applicable, in the individual resource sections of the Recirculated Draft EIR. Metro values local business and is committed to reducing potential negative effects of the Project. See also Response to Comment B-2-9 below.

### Comment B-2-7

Why weren't we or our tenants considered and included in the calculations for relief? Was it oversight and lack of awareness? What recourse do we have even now, years later, when it's clear that the result of Atlantic Station has been negative?

### Response to B-2-7

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment B-2-8

In regard to the proposed Phase 2 expansion of this line, it is indescribable what further consequences will come onto our property. The last two years, we had to borrow money to support our bank mortgage for this property, while receiving little revenue due to several tenants not being able to pay their rents. We are still bearing the burden trying to crawl out of this financial burden. Our family has owned this small shopping center since 1996. We've worked hard to help small businesses start up and grow in the East Los Angeles community. As a family asset, we have never considered selling the property; however, we understand there is now a good chance that we will be forced to sell to Metro.

### Response to B-2-8

The financial concerns expressed in the comment do not pertain to the environmental analysis in the Recirculated Draft EIR and no further response is required. However, it should be noted that relocation assistance and benefits would be provided to displaced businesses in compliance with state regulations and Metro's policies.

### Comment B-2-9

We are extremely concerned that the valuation of the shopping center will continue to degrade over the coming years, as more tenants choose not to lease at our shopping center. With the public announcement of this upcoming expansion that will probably result in a forced taking and sale of our property to Metro, it is understandable that current tenants and prospective tenants will not want to invest and try to grow their small business on a property that will be gone in a few years. Therefore, with lower occupancy and lower rents in the coming years, we feel that Metro is negatively influencing the value of our property, so when the time comes for Metro to acquire our property, the property will be in a significantly inferior position with a considerably lower valuation. We feel that this is extremely unfair to a small property owner.

### Response to B-2-9

Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment. However, CEQA requires discussion of the ways in which the project could promote economic or population growth in the vicinity of the project (CEQA Guidelines Section 15126.2[e]) and

assessment whether a project would remove obstacles to growth, require construction of new facilities or facilitate other activities that could cause significant environmental effects. See Section 3.17, Growth Inducing Impacts, of the Recirculated DEIR for a detailed discussion of potential growth-inducing impacts related to operation and construction of the Project. Pursuant to Section 15126.2[e], growth-inducing impacts would be considered significant if the Project would foster economic or population growth or the construction of additional housing either directly or indirectly and/or encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. As identified in Section 3.17, growth inducing impacts of the Project were determined to be less than significant.

As mentioned above, an economic or social change by itself that it is not related to a physical change shall not be considered a significant effect on the environment. As a result, the Recirculated Draft EIR does not consider economic impacts as environmental impacts. The indirect environmental effects of the Project's social and economic impacts are assessed, as applicable, in the individual resource sections of the Recirculated Draft EIR. Metro values local business and is committed to reducing potential negative effects of the Project. Relocation assistance and benefits would be provided to displaced businesses in compliance with state regulations and Metro's policies. See Response to Comment A-8-21 for additional information.

### Comment B-2-10

If Metro, despite our objection, pushes forward with the Eastside Transit Corridor Phase 2 project, we strongly request that Metro work with our property specifically to account and compensate us for all past damages along with the full economic value of the property had there been no Metro impact.

### Response to B-2-10

The financial concerns expressed in the comment do not pertain to the environmental analysis in the Recirculated Draft EIR as identified in Response to Comment B-2-9 above. However, it should be noted that relocation assistance and benefits would be provided to displaced businesses in compliance with state regulations and Metro's policies.

### Comment B-2-11

Based on the operating history of Metro light rail, it's difficult to see a net benefit to our community. Light rail in Los Angeles County over its history has made no financial sense.

### Response to B-2-11

See Section 2.2 of the Recirculated Draft EIR for the project objectives. As described therein, East Los Angeles County faces an increasing number of mobility challenges due to high population, employment growth, and a constrained transportation network. These mobility challenges pose a risk to future population and economic growth, including challenges for transit dependent populations, capacity constraints on existing infrastructure, inefficiency of goods movement, poor air quality conditions, and other environmental considerations. To help address these challenges, the objectives of the Project include providing additional mobility options, improving accessibility and connectivity to transit-dependent communities, and enhancing regional connectivity and air quality goals. Pursuant to CEQA, the purpose of the Recirculated Draft EIR is to evaluate potential impacts of the project and project alternatives on the physical environment; unless the funding or costs cause such an impact, they are outside the scope of the Recirculated Draft EIR.

### Comment B-2-12

We only need to look at Metro's light rail 'farebox recovery.'

"The farebox recovery ratio of a passenger transportation system is the fraction of operating expenses which are met by the fares paid by passengers."

Pre-covid, Metro light rail farebox recovery at its best, in 2012 and 2013, was at 19% and has declined each year to 9% in 2019, pre-covid. See Exhibit B. *[See the original Comment Submission B-2 located in Appendix A of the Final EIR for the referenced Exhibit B]*

Compare this to farebox recovery in other countries such as Japan 120% (2018), or Taiwan 83% (2015), or Singapore 101% (2018), Germany 70% (2010).

Low farebox recovery can signal a combination of factors including Metro being operationally inefficient, low rider demand and/or an environment not ideal for light rail, whether it's due to LA driving culture or not enough density.

### Response to B-2-12

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment B-2-13

Regardless of the mix of these factors, it's clear that light rail, especially light rail expansions to less dense areas, such as the Metro Eastside Transit Corridor Phase 2, shouldn't be pursued at all.

### Response to B-2-13

See Response to Comment B-2-11 regarding Project need and project objectives.

### Comment B-2-14

The destruction, environmental impact, destabilization of minority families is too costly a tradeoff for the expansion of an unsustainable operation such as the Metro light rail.

### Response to B-2-14

The commenter's opposition to the Project is noted. See Response to Comment I-4-3 regarding general environmental impacts. See Response to Comment B-2-2 and Response to Comment B-2-9 regarding minority populations. See Response to Comment I-9-2 regarding project costs.

## B-3: GFC Atlantic Associates, LLC

### Comment B-3-1

The purpose of this letter is to voice our strong objection to the Eastside Transit Corridor Phase 2 expansion project.

We believe there are numerous impacts beyond Metro's awareness, which include the suffering of the silent and the incalculable damages from the second and third-degree consequences of Metro expansions.

Minority business owners (like ourselves) are less likely to know how or have the resources to navigate the complex political environments to seek restitution for damages caused to us by Metro expansion projects. We believe a large proportion of damages inflicted on minorities and their small businesses have been overlooked and will continue to be overlooked by Metro.

We, along with all the shop tenants are each minority-owned small businesses, and we have all already been significantly impacted by the previous Metro expansion, Atlantic Station, that was constructed on Pomona Blvd. around 2010. Atlantic Station is directly across the street from our property, located at 271-289 S. Atlantic Blvd., in East Los Angeles, CA.

Our property lost significant visibility from southbound traffic on Atlantic Blvd a·nd westbound traffic on Pomona Blvd., which negatively affected our small business tenants (most minority owned). In the years to follow, we've had tenants who were put out of business and our property saw its lowest occupancy in the last decade of 74% in 2012, which was a direct result from Atlantic Station beginning its operations.

If the Metro Station had any positive contribution to our tenant businesses, we believe some of these benefits would have translated to increasing rents. Unfortunately, this is not the case. Our property never recovered to pre-2007 rents. Our 2022 base rents are down 20.79% from 2007, despite 90% occupancy. See Exhibit A. *[See the original Comment Submission B-3 located in Appendix A of the Final EIR for the referenced Exhibit A]*

Is Metro even aware of the challenges we've endured? We would guess not. We've received zero dollars in compensation or relief for this negative impact from the Atlantic Station expansion. Clearly the damages we've absorbed were either not anticipated in Metro's impact studies or Metro grossly underestimated the projects impacts to minorities prior to construction. We're probably not the only property owner and business adversely affected this way. Similar negative impacts have likely been replicated all the way through the path of this Metro expansion.

Why weren't we or our tenants considered and included in the calculations for relief? Was it oversight and lack of awareness? What recourse do we have even now, years later, when it's clear that the result of Atlantic Station has been negative?

In regard to the proposed Phase 2 expansion of this line, it is indescribable what further consequences will come onto our property. The last two years, we had to borrow money to support our bank mortgage for this property, while receiving little revenue due to several tenants not being able to pay their rents. We are still bearing the burden trying to crawl out of this financial burden. Our family has owned this small shopping center since 1996. We've worked hard to help small businesses start up and grow in the East Los Angeles community. As a family asset, we have never considered selling the property; however, we understand there is now a good chance that we will be forced to sell to Metro.

We are extremely concerned that the valuation of the shopping center will continue to degrade over the coming years, as more tenants choose not to lease at our shopping center. With the public announcement of this upcoming expansion that will probably result in a forced taking and sale of our property to Metro, it is understandable that current tenants and prospective tenants will not want to invest and try to grow their small business on a property that will be gone in a few years. Therefore, with lower occupancy and lower rents in the coming years, we feel that Metro is negatively influencing the value of our property, so when the time comes for Metro to acquire our property, the property will be in a significantly inferior position with a considerably lower valuation. We feel that this is extremely unfair to a small property owner.

If Metro, despite our objection, pushes forward with the Eastside Transit Corridor Phase 2 project, we strongly request that Metro work with our property specifically to account and compensate us for all past damages along with the full economic value of the property had there been no Metro impact.

Based on the operating history of Metro light rail, it's difficult to see a net benefit to our community. Light rail in Los Angeles County over its history has made no financial sense. We only need to look at Metro's light rail 'farebox recovery.'

"The farebox recovery ratio of a passenger transportation system is the fraction of operating expenses which are met by the fares paid by passengers."

Pre-covid, Metro light rail farebox recovery at its best, in 2012 and 2013, was at 19% and has declined each year to 9% in 2019, pre-covid. See Exhibit B. *[See the original Comment Submission B-3 located in Appendix A of the Final EIR for the referenced Exhibit B]*

Compare this to farebox recovery in other countries such as Japan 120% (2018), or Taiwan 83% (2015), or Singapore 101% (2018), Germany 70% (2010).

Low farebox recovery can signal a combination of factors including Metro being operationally inefficient, low rider demand and/or an environment not ideal for light rail, whether it's due to LA driving culture or not enough density. Regardless of the mix of these factors, it's clear that light rail, especially light rail expansions to less dense areas, such as the Metro Eastside Transit Corridor Phase 2, shouldn't be pursued at all.

The destruction, environmental impact, destabilization of minority families is too costly a tradeoff for the expansion of an unsustainable operation such as the Metro light rail.

### Response to B-3-1

Comment submission B-3 is identical to Comment Submission B-2. See Responses to Comments B-2-1 through B-2-14.

## B-4: PIH Health

### Comment B-4-1

Good evening. My name is Kevin Coca. I'm representing PIH Health. We support the Metro extension to Whittier because we believe it will enhance the access to health care services, especially to transients and indigent.

### Response to B-4-1

The commenter's support for Alternative 1 is noted.

### Comment B-4-2

We ask that noise vibrations as well as vehicle and pedestrian access to the campus be considered and addressed during construction,

### Response to B-4-2

Noise and vibration are addressed in Section 3.11 of the Recirculated Draft EIR, which includes consideration of PIH as well as other sensitive receptors. As described therein, impacts associated with construction would be less than significant with incorporation of mitigation. As described in Section 3.14, Transportation and Traffic of the Recirculated Draft EIR, a Traffic Management Plan would be implemented to help reduce the impacts on traffic movement in the construction work zones and would ensure that adequate and safe access would remain available to facilities within and near the Project construction zone.

### Comment B-4-3

but we're looking forward to the completion of the project. Thank you.

### Response to B-4-3

Comment noted.

# 4.3.2.4 Individuals

## I-1: David Barboza

### Comment I-1-1

1) I support Alternative 1 to extend this light rail line all the way to the City of Whittier. This will provide the maximum benefit in terms of convenient transit service and getting people to drive less.

### Response to I-1-1

The commenter's support for Alternative 1 is noted.

### Comment I-1-2

2) More grade separations would be beneficial if funding is available. This would allow the line to operate faster and be more reliable by experiencing fewer traffic collisions.

### Response to I-1-2

This project follows Metro's Grade Crossing Policy which requires a technical examination of all LRT-traffic crossings against a set of established criteria. While grade separations have a benefit of avoiding traffic signals and separating LRT from roadway vehicles, they also have a significant cost as the commenter noted. The technical examination found that the grade crossings on this project do not meet the minimum thresholds for recommending grade separations; it is consistent with other LRT lines within the Metro system, including the E Line, for safely run. As stated in Section 3.14.6.3.1 of the Recirculated Draft EIR, An initial screening (Milestone 1) analysis according to Metro's Grade Crossing Policy indicates that all proposed grade crossings under Alternative 1 would fall under the least restrictive category "At Grade Operation Should Be Feasible", with the exception of the crossing at the Lambert Road terminal approach. At this location, the alignment would be at-grade and cross eastbound traffic on Washington Boulevard to access the station platform. The initial screening shows that this location would fall under the "Possible At Grade Operation" category. This grade crossing, like the others proposed elsewhere on the line, would be designed according to applicable MRDC and CPUC standards and would include traffic signal

coordination and upgrades to avoid conflicts between LRVs and eastbound traffic along Washington Boulevard.

### Comment I-1-3

An aerial alignment is okay, since that can be done at a lower cost than an underground alignment.

### Response to I-1-3

The commenter's support for the aerial alignment is noted.

### Comment I-1-4

3) The proposed route comes very close to Uptown Whittier, which is a major source of residential and employment density, and thus potential ridership, but doesn't quite get there, which is very unfortunate. If we're going to spend billions of dollars on a light rail line, it should serve the major centers in the corridor.

### Response to I-1-4

As discussed in Recirculated Draft EIR Appendix T, Alternatives Withdrawn from Further Evaluation, the evaluation and screening of concepts, engineering and environmental refinements, and decisions to withdraw alternatives from consideration has a long history in the development of the Project. The 2009 Alternatives Analysis developed 47 conceptual alternatives that were narrowed to 17 initial alternatives. The Alternatives Analysis evaluated a direct route to Uptown Whittier but noted concern for potential impacts to businesses during construction, right-of-way requirements and increased congestion. The commenter asserts that the Project should serve major centers in the corridor. As discussed in Section 2, Project Description, of the Recirculated Draft EIR, the Project would serve major activity centers. This includes large educational institutions, such as Whittier College, and East Los Angeles Community College, recreation areas serving local residents, major retail and commercial centers (e.g., Citadel Outlets and the Historic Whittier Boulevard Shopping District), civic centers (Pico Rivera City Center), and medical centers (Whittier Presbyterian Intercommunity Hospital). Figure 2.5 in the Recirculated Draft EIR illustrates the major centers the Project would serve.

### Comment I-1-5

Transit connections to the terminus will be critical if this problem isn't fixed, but currently they aren't very strong at all.

### Response to I-1-5

As discussed in Section 3.14.6.1 of the Recirculated Draft EIR, the Project may result in increases in ridership for bus lines that provide connections or feeder services to the alignment. The existing bus routes have capacity and with anticipated improvements described in the *NextGen Bus Plan*, additional efficiencies and improvement will be made to local services. Additionally, the Project would provide travel time savings benefits and would enhance transit connectivity with the existing local bus network. As also discussed in Section 3.14.6.1. the Project would provide bicycle circulation and enhanced access in the immediate station areas, such as bicycle parking and connections to existing nearby bike facilities within up to a 600-foot radius for improved bicycle-to-transit connections, which would be determined during preliminary engineering.

### Comment I-1-6

4) Metro should aggressively pursue opportunities for transit oriented development along the entire corridor to address our housing affordability crisis and allow more people to access the line without having to drive.

### Response to I-1-6

As discussed in Section 3.17.6.1 of the Recirculated Draft EIR, potential indirect effects related to the Project would include the future planning and development of TODs surrounding the proposed station areas. As identified in project measure PM GRW-1 in Section 3.17.7.1, Metro would coordinate with local jurisdictions to develop new corridor-wide governance strategies and implement plans, policies, and economic development strategies to transform station areas into equitable, sustainable and safe areas for development in the Project corridor. In addition, several jurisdictions in the corridor have completed or are in the process of developing their own individual station area plans.

## I-2: Christine Mowles

### Comment I-2-1

-If Alternative 1 is selected, what is the plan for commuters who might need a place to park before getting on the light rail?

### Response to I-2-1

As described in Section 2.5.1.2 of Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the Atlantic/Pomona station (relocated/reconfigured), and surface parking would be provided at each of the at-grade stations.

## I-3: David Woolery

### Comment I-3-1

I want to submit that I am very happy about this rail line coming to the Whittier area, and look forward to it being built.

### Response to I-3-1

The commenter's support for the Project is noted.

### Comment I-3-2

The station location at 5-points is an excellent choice, as I see it not only serving Whittier, but it also serves as a good strategic location from which to possibly extend future lines using the Lambert Road rail corridor into the North OC region. I would like to think that in the coming decades, this line could eventually extend to serve Fullerton, Buena Park, Anaheim, and beyond.

### Response to I-3-2

The commenter's support for the location of the proposed Lambert station is noted.

## I-4: Shirley Davis

### Comment I-4-1

We believe that either Alternative 2-Commerce/Citadel or Alternative 3- Greenwood Station would be best.

### Response to I-4-1

The commenter's support for Alternative 2 and Alternative 3 are noted.

### Comment I-4-2

We do not want it going down Washington Blvd because it is already too crowded with all the Trucks and Factory traffic. It is extremely bad during holidays because of people going to the Citadel. It would really help the citizens in the Rosewood and Roseini neighborhoods if the Gold Line went directly to the Citadel. That way all the shoppers will go right to where they want to be and not be dumped off on Washington and then have to go walk the rest of the way to the Citadel. That will be a nightmare!

### Response to I-4-2

The commenter's opposition to Alternative 1, going down Washington Boulevard, and support for Alternative 2, which goes to Citadel, is noted. The potential impacts of the Project on transportation and traffic are analyzed in Section 3.14.6 of the Recirculated Draft EIR. Regarding congestion, CEQA and the CEQA Guidelines no longer require a level of service analysis to determine significant impacts. See Response to Comment A-7-16 for additional information.

### Comment I-4-3

Please do not put the Gold Line on Washington Blvd. We already have it bad. Don't make it worse for us that live in the area.

### Response to I-4-3

The commenter's opposition to the Project is noted. The commenter is referred to Table ES-2 in the Executive Summary of the Recirculated Draft EIR. This table provides a summary of impact evaluations for all resource topics considered in the Recirculated Draft EIR, including required mitigation measures for potentially significant impacts.

In particular, the commenter is referred to Section 3.1, Aesthetics, Section 3.2, Air Quality, Section 3.11, Noise and Vibration, Section 3.13, Public Services and Recreation, Section 3.14, Transportation and Traffic, and Section 3.17, Growth Inducing Impacts, of the Recirculated DEIR for a detailed discussion of impacts related to these resources from operation and construction of the Project. A brief summary of impacts related to these resource topics is provided below:

- Aesthetics: As identified in Section 3.1, operation and construction of the Project would result in less than significant impacts on aesthetics and no mitigation is required.
- Air Quality: As identified in Section 3.2, operation and construction of the Project would result in less than significant impacts on air quality and no mitigation is required.

- Noise and Vibration: As identified in Section 3.11, operation and construction of the Project would result in less than significant impacts from noise and vibration, with implementation of mitigation.
- Public Services and Recreation: As identified in Section 3.13, operation and construction of the Project would result in less than significant impacts on public services and no mitigation is required.
- Transportation and Traffic: As identified in Section 3.14, operation and construction of the Project would result in less than significant transportation impacts, with implementation of mitigation.
- Growth-Inducing Impacts: As identified in Section 3.17, operation and construction of the Project would result in less than significant growth-inducing impacts and no mitigation is required.

## I-5: Jessica Huerta

### Comment I-5-1

My concern is more traffic in our community. The line will bring more people and more of a dirty environment like what we see in other communities affected by the metro.

### Response to I-5-1

As identified in Section 3.14 of the Recirculated Draft EIR, with implementation of mitigation for construction impacts, operation and construction of the Project would result in less than significant impacts to traffic. See Response to Comment CO-7-3, regarding the potential for the Project to induce growth; also see Response to Comment I-4-3 regarding environmental impacts evaluated in the Recirculated Draft EIR.

### Comment I-5-2

The neighbors hate the idea and feel that only because we are a lower income community is why we are being targeted for the project. You do not find the metro in nicer upscale communities. The environment of our community will change to more of a busy downtown city feel, something we chose to distance ourselves from by moving to Pico Rivera or Montebello.

### Response to I-5-2

The commenter's opposition to Alternative 2 and Alternative 3 is noted. See Response to Comment B-2-11 regarding the need for the Project and Project objectives. As identified therein, and identified in Section 2.2 of the Recirculated Draft EIR, Project objectives include enhancing mobility and access throughout the region and improving accessibility and connectivity to transit-dependent communities.

## I-6: Manuel R

### Comment I-6-1

I am a resident of montebello. I live on Washington blvd. This will cause traffic, and stores will out of business. Don't turn this another East Los Angeles.

### Response to I-6-1

As explained in Section 3.14.6.2 of the Recirculated Draft EIR, Alternative 1 would result in reduced VMT (approximately 10,000 daily) compared to the No Project Alternative. Additionally, as identified in PM TRA-1 (Section 3.14.7.1), components of the Project will include new or modifications to existing traffic signals to accommodate light rail movements and traffic circulation patterns at intersections, enhancements to existing signalized crosswalks, and bicycle circulation and access amenities in immediate station areas. As such, operation of the Project is not expected to lead to a substantial or measurable increase in vehicle travel. See Response to Comment A-8-21 regarding impacts to small businesses.

## I-7: Lawrence Reynolds

### Comment I-7-1

Good Day Metro Board, It makes little to no sense to disrupt, as we have come to experience with past projects of this type, the lives and transportation venues for any option other than the Alternative 1 -Washington. Alternative 1 would connect the multiple communities (East Los Angeles, Santa Fee Springs, Pico Rivera, Whittier and etc.) and also provide access to Rio Hondo CC.

### Response to I-7-1

The commenter's support for Alternative 1 is noted.

### Comment I-7-2

In defense of the other Alternatives 2 & 3, they have their merits; but fall woefully short of expanding the line so that ridership, aka utilization, can be significantly improved.

### Response to I-7-2

The commenter's opposition to Alternative 2 and Alternative 3 is noted.

### Comment I-7-3

Lastly, none of the above routes will be utilized unless they are fully and properly secured with both uniform and undercover metro police officer/security. In closing, I personally have not used a metro bus or light or heavy rail since prior to the pandemic due to my concern for mine and those riding with me personal safety. Frankly, ridership WILL NOT increase without a "Law and Order" upgrade/change in the Los Angeles DA Office. "Cashless Bail" MUST be OVERTURNED with all due haste. Simply put, "Yesterday would NOT be too soon." The current occupant must be removed and replaced with an Officer of the Court who possesses and will operate the DA Office with the mindset like that of the new DA in San Francisco. the DA major and primary concern must be that of safety for law abiding riders and citizens. Misbehavior and bad acts, aka criminal acts, must have negative consequences. "You DO the CRIME. You MUST do the TIME."

### Response to I-7-3

The potential for the Project to introduce or increase criminal activity is beyond the scope of CEQA to address. Pursuant to CEQA Guidelines Section 15382, an economic or social change by itself that is not related to a physical change shall not be considered a significant effect on the environment. However, the Project would integrate measures to maximize security for all

passengers. As identified in Section 3.13.6.1, Public Services and Recreation, of the Recirculated Draft EIR, security issues, such as fare evasion, assault or robbery, could potentially occur at stations. Per Section 3.13.6.1 of the Recirculated Draft EIR and as identified in PM PSR-1, Metro shall supplement existing police protection services by providing Transit Services Bureau officers and contracted police services at all new LRT facilities, as needed, to ensure that adequate police protection services are provided. As discussed in Response to Comment A-8-19, in the fall of 2022, Metro launched a three-year pilot transit ambassador program and is deploying trained contract personnel on Metro's buses, bus stops, trains, and stations. Ambassadors are unarmed and travel the system or are present at stations to promote safety for riders and operators. The primary role of the transit ambassador program is to be a visible presence. LRT system riders would be subject to Metro guidelines and requirements pertaining to safety and crime prevention. Therefore, the Project would result in a less than significant impact in respect to police protection services and no mitigation measures are required.

## I-8: Jose

### Comment I-8-1

My major concern with this project is the reduction in scope without any potential of an expedited timeline. I would urge metro to build the entire line as originally proposed, in a phased manner. The Residents of East LA are eager for improved access to rail and the benefits those bring to the community.

### Response to I-8-1

The commenter notes that selection of Alternative 2 or Alternative 3, which are Initial Operating Segments, would have similar construction timeframes as the full alignment (Alternative 1). This is because construction of the underground portion of the Project, which is common to all Build Alternatives, would require the longest duration among all construction activities. As discussed in Section 2.6.1 of the Draft Recirculated EIR, the construction of the Project is expected to last approximately 60 to 84 months. The underground portion of the Project is part of the construction schedule's critical path for all alternatives.

## I-9: Mario Tovar

### Comment I-9-1

Even though the "experts" have said the environment would not be affected, the working citizens would include the following.

-higher crime and homeless people that the MTA will bring. (police are inept at doing their job)

### Response to I-9-1

See Response to Comment A-8-19 regarding security and people experiencing homelessness and Response to Comment I-7-3 regarding crime.

### Comment I-9-2

-Still does not justify 3 billion dollars for digging holes in the ground. (buy electric buses cheaper than a train)

### Response to I-9-2

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues. Pursuant to CEQA, the purpose of the Recirculated Draft EIR is to evaluate potential impacts of the project and project alternatives on the physical environment; unless the funding or costs cause such an impact, they are outside the scope of the Recirculated Draft EIR. Consequently, project costs and funding mechanisms, which alone do not constitute an environmental impact, are not required to be evaluated under CEQA and are accordingly not evaluated in the Recirculated Draft EIR. In accordance with the CEQA Guidelines, Section 15126.6(f)(1), economic viability was considered when identifying the feasibility of alternatives which would avoid or substantially lessen significant effects of the project. However, as described above, analyses of project costs relative to project or alternative benefits is outside the scope of this Recirculated Draft EIR.

### Comment I-9-3

-how does MTA know our city needs more public transportation Montebello, Pico, Commerce, and Whittier already have a public transportation system.

-There is already too much traffic around our small cities. This train will only exacerbate every problem on this small list of mine.

### Response to I-9-3

The Project was initiated in 2007 and the Eastside Transit Corridor Phase 2 Alternatives Analysis (AA) was published in 2009. The AA Report conducted technical studies and established the purpose and need of the project by defining mobility challenges and developing project goals and objectives within the study area. The AA Report also identified and assessed transportation alternatives to be studied further in the environmental process. In October 2009, the Metro Board authorized staff to advance environmental analysis for the Eastside Transit Corridor Phase 2 Project. Additionally, as stated in Section 3.14.2.3 of the Recirculated Draft EIR, the Project is included in the list of projects anticipated to be initiated or completed through the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) horizon year of 2045. The Project is also listed in the Los Angeles County Transportation Expenditure Plan (2016) developed by Metro for implementing the transportation projects funded by Measure M, a sales tax measure to fund infrastructure expansion throughout Los Angeles County. See also Response to Comment B-2-11 regarding need and project objectives.

### Comment I-9-4

-The city of Los Angeles has a bigger police department even though they cannot stop the high crime in their public transportation. Which makes the surrounding small police department not capable of stopping crime here.

DO NOT WASTE TAXPAYERS MONEY AND MAKE CRIME AN EVERYDAY ISSUE, TRAFFIC WORSE than it is

### Response to I-9-4

See Response to Comment I-9-2 regarding cost and Response to Comment I-7-3 regarding crime. Regarding traffic, as discussed in Section 3.14.6.2 of the Recirculated Draft EIR, Alternative 1 would result in approximately 10,000 daily reduced VMT compared to the No Project Alternative. Additionally, as identified in PM TRA-1 (Section 3.14.7.1 of the Recirculated Draft EIR), components

of the Project shall include new or modifications to existing traffic signals to accommodate light rail movements and traffic circulation patterns at intersections, enhancements to existing signalized crosswalks, and bicycle circulation and access amenities in immediate station areas. As such, operation of Alternative 1 is not expected to lead to a substantial or measurable increase in vehicle travel.

## I-10: Cristina Tovar

### Comment I-10-1

I am a wife and mother of 3, and I am very concerned about my family here in Montebello. The crime in Montebello is getting worse, especially regarding shootings around the corner from my house. This Gold Line MTA is not just a waste of money but will bring crime and homeless people. The best example I can give is the city of Los Angeles which has public transportation (MTA), and with a police department that big, they can't even handle the crime on their trains. The LAPD has the largest police department with unlimited resources, and they can not solve the high crime on trains. I can imagine a small city with a police force of fewer than 80 cops.

### Response to I-10-1

The comment raises concerns similar to those in Comment I-9-4. See Response to Comment I-9-4. Please also see Response to Comment A-8-19 for additional discussion related to security and people experiencing homelessness and Response to Comment I-7-3 for additional discussion related to crime.

### Comment I-10-2

-3 billion dollars is way too much money for 9 miles of the train.

### Response to I-10-2

See Response to Comment I-9-2.

### Comment I-10-3

-traffic is already bad, and the train will be a problem.

### Response to I-10-3

The commenter's opposition to the Project is noted. See Response to Comment I-6-1 regarding traffic.

### Comment I-10-4

- The police and the government officials do not do anything about the rising crime and homeless people.

### Response to I-10-4

See Response to Comment A-8-19 regarding project safety and security and people experiencing homelessness.

### Comment I-10-5

-We already have public transportation in Montebello why do we need a 3 billion dollar train? Sounds like a waste of money which is better used to buy electric buses and not a train.

### Response to I-10-5

As stated in Section 3.14.2.3 of the Recirculated Draft EIR, the Project is included in the list of projects anticipated to be initiated or completed through the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) horizon year of 2045. The Project is also listed in the Los Angeles County Transportation Expenditure Plan (2016) developed by Metro for implementing the transportation projects funded by Measure M, a sales tax measure to fund infrastructure expansion throughout Los Angeles County. As stated in Section 2.2 of the Recirculated Draft EIR, East Los Angeles County faces an increasing number of mobility challenges due to high population, employment growth, and a constrained transportation network. There is no rail connection for communities and if left unaddressed, these mobility challenges pose a risk to future population and economic growth, including challenges for transit dependent populations, pedestrian and bicycle safety, capacity constraints on existing infrastructure, inefficiency of goods movement, poor air quality conditions, and other environmental considerations. As further described in Section 2.2, to help address these challenges, the objectives of the Project include providing additional mobility options, improving accessibility and connectivity to transit-dependent communities, and enhancing regional connectivity and air quality goals. By serving concentrated areas of employment, activity centers and residential communities, the Project will support transit-oriented community goals and address the mobility needs of transit-dependent populations. The Project will provide new and faster transit options which will help lead to equitable development and in-fill growth opportunities throughout eastern Los Angeles County. See also Section 3.14.6.1 of the Recirculated Draft EIR for more information on how the Project would increase countywide transit travel.

Regarding the project cost, see Response to Comment I-9-2. Regarding alternatives to the Project that have been considered, including buses, see Response to Comment CO-4-15.

### Comment I-10-6

-This project is obviously about money, and the only people that will suffer are the working people and small children

### Response to I-10-6

The commenter's opposition to the Project is noted. See Response to Comment I-4-3 regarding the Project's environmental impacts.

## I-11: Celia Medina

### Comment I-11-1

This community that you are going to disrupt with this metro is not supportive of this situation! There is already an increase in crime and this metro being input into our city will only create more crime.

### Response to I-11-1

The commenter's opposition to the Project is noted. See Response to Comment I-7-3 which addresses concerns related to security and crime.

### Comment I-11-2

You are also disrupting the city and its beauty. People come to live in this city to stay away from the LA over population. Please do not bring this metro into our community! We do not want it.

### Response to I-11-2

The commenter's opposition to the project is noted. Although not specific, the comment's reference to the city's "beauty" could relate to visual/aesthetic impacts and may also relate to population density. Visual impacts are discussed in Section 3.1, Aesthetics, of the Recirculated Draft EIR. As discussed therein, the Project is not anticipated to cause a significant impact to scenic vistas, scenic resources, or the visual character and quality of public views and the Project surroundings. The aesthetic design of stations and related transit facilities would aim to promote a sense of place. Population impacts are addressed in Section 3.12, Population and Housing, of the Recirculated Draft EIR. As indicated in Section 3.12.6.1, implementation of the Project would not induce unplanned population growth or dramatically stimulate development, and the impact would be less than significant.

## I-12: Patricia Gomez

### Comment I-12-1

This project is a complete waste, and we do not want more crime in East LA.

### Response to I-12-1

The commenter's opposition to the Project is noted. See Response to Comment I-7-3 which addresses concerns related to security and crime.

### Comment I-12-2

There are much better ways to spend taxpayer money. Please release a full cost benefit analysis that includes other alternatives. You only have 1 route, with no real alternatives. Prove that there is a need for this project.

### Response to I-12-2

See Response to Comment I-9-2 regarding the project cost. See Response to Comment I-10-5 regarding the project need. The Recirculated Draft EIR considered three Build Alternatives and the No Project alternative. The Build Alternatives include Alternative 1 (Atlantic Boulevard to Lambert station), Alternative 2 (Atlantic to Commerce/Citadel Initial Operating Segment [IOS]), and Alternative 3 (Atlantic to Greenwood IOS). The Recirculated Draft EIR also considered design options for each of the three Build Alternatives. Pursuant to CEQA requirements, the EIR evaluates a range of reasonable alternatives to the Project that would feasibly attain most of the basic objectives of the Project, but would avoid or substantially lessen any of the significant effects. For a comparison of the three Build Alternatives and the No Project Alternative, see Chapter 5 of the Recirculated Draft EIR. Additionally, see Appendix T for detail about alternatives that that were considered and withdrawn from further evaluation.

## I-13: Amy Margolis

### Comment I-13-1

Please release all ridership data and a full cost-benefit analysis for this project, comparing this project to other Metro projects and existing lines. The public deserves to know how well used this project will be, and how it compares to other mega projects. Metro owes the public an explanation as to why $5 billion should be sent for less than 10,000 boardings when there are several other Metro lines and projects with exponentially higher ridership and use. We will not accept the standard boilerplate response you have given to date.

### Response to I-13-1

As stated in Section 3.14.6.1.1 of the Recirculated Draft EIR, Alternative 1 is forecasted to increase countywide transit travel by approximately 7,700 new transit trips daily compared to the No Project Alternative (difference between daily linked transit trips for Alternative 1 and the No Project Alternative), and approximately 15,000 total weekday boardings. As stated in Section 3.14.6.1.2, Alternative 2 is forecasted to increase countywide transit travel by almost 4,000 new transit trips daily and approximately 7,800 total weekday boardings. As stated in Section 3.14.6.1.3, Alternative 3 is forecasted to increase countywide transit travel by almost 6,000 new transit trips daily and approximately 11,000 total weekday boardings.

Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5.

## I-14: Ed Izaguirre

### Comment I-14-1

Hello, My name is Ed Izaguirre, and I am a Whittier resident. After looking at the three alternatives, I would appreciate the Alternative 1 option, which would take the Gold Line out here to Whittier. Living in the Gateway Cities my entire life, we have been desperately underserviced by public transportation. An option to take light rail would truly be life changing. I would stop taking my car to many places, and would instead take public transportation. Thank you, Ed

### Response to I-14-1

The commenter's support for Alternative 1 is noted.

## I-15: Daniel Gomez

### Comment I-15-1

This project does not make financial sense in any way, shape or form. Metro owes it to the public to publish a full cost-benefit analysis that compares this project with other transit projects across the county. Why is a project that serves less than 1,700 riders per mile, less than all other projects and several dozen bus lines, being prioritized instead of others that serve more people, more transit riders, more destinations, etc.?

### Response to I-15-1

Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1.

## I-16: Dominic Gonzalez

### Comment I-16-1

Build Alternatives: Preferred option would be Op.1. Breaking up may allow quicker implementation but make it possible more expensive due to inflation and other issues such as tariffs, inflation, material scarcity, etc.

### Response to I-16-1

The commenter's preference for Alternative 1 is noted. However, regarding schedule, the underground portion of the Project is part of the construction schedule's critical path for all alternatives.

### Comment I-16-2

I do not like the placing of the final Whittier station going down Lambert though. Positing it in a way to make an extension to Whittier Blvd and old town Whittier would be much more impactful for the community and future ridership rather than pushing it down Lambert.

### Response to I-16-2

The commenter's opposition to the Whittier station on Lambert is noted. It should be clarified that the alignment does not extend down Lambert Road but instead curves southward approximately one block west of Lambert Road. Regarding an alignment along Whittier Boulevard, the commenter is referred to Appendix T, Alternatives Withdrawn from Further Evaluation, of the Draft Recirculated EIR. As described therein, Whittier Boulevard was analyzed in the 2009 Alternatives Analysis (Attachment A of Appendix T) but was eliminated from further evaluation due to significant community impacts, including a high potential for noise and vibration, community cohesion, and street system capacity impacts.

### Comment I-16-3

My next preferred option would be Op.3. Although it would no go as far, this extension would provide the greatest connectivity beyond the East Los Angeles; however, I would push this alternative to Rosemead at least to better connect with future BRT that is planned through SGVCOG.

### Response to I-16-3

The commenter's support for Alternative 3 with a further extension to Rosemead is noted.

### Comment I-16-4

Option 2 would get it started but is far to insufficient for what we need to transition from auto to train travel.

### Response to I-16-4

The commenter's opposition to Alternative 2 is noted.

### Comment I-16-5

In terms of stations, I prefer the Atlantic/Pomona Station option as it is a nice layout similar to that in Pasadena and save a great deal of money. But I would design it in a way to have a new tower constructed on a portion of the triangular site in the future.

### Response to I-16-5

The commenter's support for the Atlantic/Pomona Station Option is noted.

### Comment I-16-6

I prefer the commerce location due to the flexibility.

### Response to I-16-6

The commenter's support for the Commerce MSF site option is noted.

### Comment I-16-7

Aesthetic:

For the Bridge over the river, please employ an aesthetic design reminiscent of the the bridges over the LA River in Downtown LA or newer bridges such as the Basket Bridge for the Gold Line over the 2010. This area is a more natural river bed in LA County with a great bike path. Adding a nice architectural feature here would be great in terms of sprucing up the experience.

### Response to I-16-7

As discussed in Section 3.1,6.3 of the Recirculated Draft EIR, the replacement bridges would alter, but not substantially degrade, the visual character and quality of their surroundings. Therefore, impacts associated with visual character would be less than significant. Metro will continue to engage with and solicit input from community organizations on the Project's design as it proceeds, contingent upon approval of the project by the Metro Board, through preliminary engineering, final design, and construction. The architectural treatments will be determined during the preliminary engineering and design phase of the Project.

### Comment I-16-8

Also look at upgrades to the bike paths that it will be covering and see about basic upgrades to the bike lanes that run under it. and street bridge.

### Response to I-16-8

As described in Section 3.14.6.1 of the Recirculated Draft EIR, the Project would provide bicycle circulation and enhanced access in the immediate station areas, such as bike parking and connections to existing nearby bike facilities within up to a 600-foot radius for improved bicycle-to-transit connections, which would be determined during preliminary engineering. Upgrades to the multi-use trails/bike path located underneath the bridges are not in the Project's scope. If any damage to the trails occurs during construction activities, the trails would be restored to existing conditions.

### Comment I-16-9

Transportation and Traffic:

I would look to future proof the design by allowing the existing segment to be broken up into three future lines. The first new line would be an extension of the E line from Atlantic station down Beverly Blvd to Whittier Old town and then possibly connect with a further extension of the currently planned L line extension to Whittier Blvd and Painter/Greenleaf. A second line till go down Atlantic Blvd which is currently being studied for implementation by SGVCOG, and could connect this area to San Gabriel Valley cities such as Monterey Park, and Alhambra, San Marino and South Pasadena and south to Maywood, Bell, Cudahy, South Gate (connecting to the future Artesia Line Station), and eventually south to Long Beach. The third line would be the portion the existing lines portion Along Washington then connection to the original L Line with increased service west of Atlantic/Pomona station or down Olympic into DTLA.

### Response to I-16-9

The first discussed new line was considered in the 2009 Alternatives Analysis for this Project but not recommended for further study due to right-of-way issues, traversing land owned by Southern California Edison and Union Pacific Railroad, community impacts along the alignment (with impacts to sensitive land uses, including possible visual, traffic, safety, noise and vibration impacts), constrained sections on Beverly Boulevard making it difficult for rail operations and necessary vehicular capacity to coexist, and lack of community, stakeholder, and elected official support. For additional information see Appendix T of the Recirculated Draft EIR.

The second discussed line would not serve the general project area as it would be further north and south, and therefore, it would not be consistent with the area the identified funding for this Project.

The third discussed line has common elements with Alternative 1 along Washington Boulevard, but instead proposes to run east/west along Olympic Boulevard into downtown. This would be a parallel service with the existing L Line running along 3rd Street but would be outside of the General Project Area.

### Comment I-16-10

For traffic mitigation at crossings, please put extra effort into the intersection of Rosemead and Washington as this will intersection is highly trafficked and it would be best for the train service, traffic, and future rail down Rosemead, so it is very important to grade separate this intersection.

### Response to I-16-10

The commenter's support for a grade-separated crossing at Rosemead Boulevard is noted. See Response to Comment A-10-5 regarding the evaluation of intersections for grade separation.

Regarding project measures that will be implemented at crossings, Section 3.14.7.1 of the Recirculated Draft EIR, PM TRA-1 outlines project measures which are components of the Project that would provide enhancements to signalized crosswalks and signals in accordance with Metro Rail Design Criteria (MRDC) standards to accommodate light rail movements, traffic circulation patterns at intersections, grade crossings, and to facilitate pedestrian access to/from stations (e.g., mid-block crossings at stations).

## I-17: Cristina Zuniga

### Comment I-17-1

A light rail light is very much needed from DTLA to Whittier. There aren't any freeways that go directory to south Montebello, Pico Rivera and Whittier. We are forced to take the streets. A under or above ground line would help alleviate that traffic.

### Response to I-17-1

The commenter's support for Alternative 1 is noted.

### Comment I-17-2

It would also open up more employment opportunities for these communities. South Montebello and commerce are industrial areas which will bring many jobs opportunities.

### Response to I-17-2

The commenter accurately characterizes the Project. As discussed in Section 2, Project Description, of the Recirculated Draft EIR, Alternative 1 would serve major employment centers.

## I-18: Amy Gong

### Comment I-18-1

This is so wonderful! So excited and can't wait for the day it extends even further east!! Thank you for all your amazing work!

### Response to I-18-1

The commenter's support for the Project is noted.

## I-19: Iris Nunez

### Comment I-19-1

I welcome the possibility of rail transit extending the gold line to the south. It was disheartening when the gold line was extended to the northeast in advance of the south east.

### Response to I-19-1

The commenter's support for the Project is noted.

### Comment I-19-2

Many people do not take public transportations because it would take them so much longer than driving. The last time I went downtown, it took me 3 hours from Pico Rivera. It took me 2-3 buses depending on my route. 2 of those buses were late. I spent much of that time waiting for the different buses. The transit app was highly inaccurate with transit times. Google maps had less inconsistencies. There is a great need to better public transit here. But the reliability and frequency of that needs to increase.

The underground alternatives are more attractive, because the trains will not have to stop for streetlights. The line could also be extended once more funds are available.

### Response to I-19-2

The commenter's support for Alternative 2 is noted.

### Comment I-19-3

All the alternatives follow the same route, but there should be more routes considered, like placing the line alongside the Union Pacific Railroad.

### Response to I-19-3

See Response to Comment CO-4-15 regarding alternatives for the Project that have been considered and withdrawn.

### Comment I-19-4

Everything considered, I would welcome a rail line connecting the southeast community to other cities in a reliable and frequent way.

### Response to I-19-4

The commenter's support for the Project is noted.

## I-20: Anonymous

### Comment I-20-1

Please explain why rail is justified in this corridor when Metro's own presentations and guidance indicate that rail is meant for high demand corridors where the number of riders justifies this higher capacity mode. Metro also needs to justify why rail subway is justified for an extension that will only serve 7,800 daily boardings, less than what some Metro BUS stops at major intersections handle today. Metro is contradicting itself by showing graphics where rail is best suited for corridors with the highest demand, highest congestion, and most dense urban settings. Please explain why this subway should be a priority over any other subway project in the county, including projects with much higher benefits to hundreds of thousands of riders. As "transit planners", Metro has a responsibility to the public to reveal how this project will perform, what its benefits are compared to other potential projects in the county, and why these low ridership numbers justify rail, let alone rail subway. Metro is doing the exact opposite in this document, burying ridership numbers and doing absolutely no comparison to other projects to show whether or not this investment is worth the small benefits.

### Response to I-20-1

The Project was initiated in 2007 and the Eastside Transit Corridor Phase 2 Alternatives Analysis (AA) was published in 2009. The AA Report conducted technical studies and established the purpose and need of the project by defining mobility challenges and developing project goals and objectives within the study area. The AA Report also identified and assessed transportation alternatives to be studied further in the environmental process. In October 2009, the Metro Board authorized staff to advance environmental analysis for the Eastside Transit Corridor Phase 2 Project. Additionally, as stated in Section 3.14.2.3 of the Recirculated Draft EIR, the Project is

included in the list of projects anticipated to be initiated or completed through the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) horizon year of 2045. The Project is also listed in the Los Angeles County Transportation Expenditure Plan (2016) developed by Metro for implementing the transportation projects funded by Measure M, a sales tax measure to fund infrastructure expansion throughout Los Angeles County. See also Response to Comment B-2-11 regarding need and project objectives. See Response to Comment I-13-1 regarding ridership.

## I-21: Richard Farber

### Comment I-21-1

This isn't a question; it's a gripe. I've complained before; I'll keep this brief. The Southern residents of Montebello as you are aware, do not want this rail put through. The added congestion will be miserable. Your people have already told us that the reason for this route is to save money. But that's unconscionable knowing that it will impact our standard of living greatly in southern Montebello.

### Response to I-21-1

The commenter's opposition to the Project is noted. As discussed in Section 3.14.6.2 of the Recirculated Draft EIR, Alternative 1 would result in approximately 10,000 daily reduced VMT compared to the No Project Alternative. Additionally, as identified in PM TRA-1 (Section 3.14.7.1 of the Recirculated Draft EIR), components of the Project shall include new or modifications to existing traffic signals to accommodate light rail movements and traffic circulation patterns at intersections, enhancements to existing signalized crosswalks, and bicycle circulation and access amenities in immediate station areas. As such, operation of the Project is not expected to lead to a substantial or measurable increase in vehicle travel. See Section 3.14, Transportation and Traffic, for additional information. Regarding congestion, CEQA and the CEQA Guidelines no longer require a level of service analysis to determine significant impacts; see Response to Comment A-8-14 regarding this change.

## I-22: Joe Chaides

### Comment I-22-1

I am concerned about an at grade transit corridor along Washington Blvd. It will congest, an already congested area. It should either be above or below ground or find another corridor instead of Washington Blvd.

### Response to I-22-1

The commenter's opposition to an at-grade configuration is noted. Regarding alternative routes that have been considered, see Response to Comment CO-4-15. Regarding grade-separation, see Response to Comment A-10-5. Regarding congestion, see Response to Comment I-21-1.

## I-23: Assal Farahani

### Comment I-23-1

I used to take the metro to downtown and back 3 years ago . But now I don't feel safe taking the metro it's too dangerous for me. We have to put many security force so that people can feel safe taking the metro.

### Response to I-23-1

See Response to Comment I-7-3 regarding safety and security.

## I-24: Drew Katonak

### Comment I-24-1

I think this is a great idea for La County residents I live in the county I love the county and love Metro so I think this is a great idea for you guys to build a line

### Response to I-24-1

The commenter's support for the Project is noted.

## I-25: Arturo Ramirez

### Comment I-25-1

The EIR document, including transportation technical report and appendix, and all boardings reported for this project have a clear and significant error. The project cannot claim boardings at the existing Atlantic station as boardings or benefits of the project, especially when boardings at the Atlantic station will be higher without the project! The project is taking credit for an extra 4,000 boardings at Atlantic that would happen without the project as well. The 14,965 total boardings for the project should be reduced to less than 10,965, based on the no build ridership at the Atlantic station. Yet another way Metro is deceiving the public on the supposed benefits of this wasteful mega project.

### Response to I-25-1

The 14,965 is total station boardings. The additional boarding at the Atlantic (relocated/reconfigured) station associated with the Project would be a result of a shift in passengers boarding to travel to the southeast from the existing Atlantic Station. The current Atlantic Station could experience some shifts due to the Project because some riders who drive to the current terminus would instead utilize the extension associated with the Project.

## I-26: Andrew Morrish

### Comment I-26-1

I am writing as a resident of the southside of Montebello and I fully support the Alternative 1 Washington extension plan.

### Response to I-26-1

The commenter's support for Alternative 1 is noted.

## I-27: Emmanuel Sandoval

### Comment I-27-1

Pedestrian crossovers:

-Has there been any implementation/study of pedestrian crossovers that are not near a station stop or intersection? How will residents be able to cross over the train line without having to walk all the way to the nearest intersection? In some cases this will be a hassle to get over to the other side of the light rail line.

Vehicle crossovers:

-How many current vehicle crossovers off washington blvd into residential neighborhoods will be eliminated with the new light rail line? -Will left turn signals at intersections be upgraded to make allow U-turns?

### Response to I-27-1

As shown in drawings CS-W-116 through CS-W-141 of Volume 2, Advanced Conceptual Design, of the Recirculated Draft EIR, pedestrian crossings would be maintained at major signalized intersections or signalized pedestrian crossings, and would be eliminated at unsignalized minor intersections between Montebello Boulevard and Lambert Road for the baseline Alternative 1. U-turns would be allowed at signalized intersections; in some locations, the introduction of an LRT median guideway improves the turning radius provided for U-turns.

### Comment I-27-2

Station Quantity:

-7 total stations may be too few, has there been a design scheme with more stations?

-It already takes forever to get from the atlantic station to union station and vice versa, might as well make more stations in each city for the new extension.

### Response to I-27-2

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR. Section 2, Project Description, provides information regarding the stations proposed for the Project.

### Comment I-27-3

Duration of time: -Where is the study that shows how long it will take to get from one station to DTLA?

### Response to I-27-3

As stated in Section 3.14.6.1.1 of the Recirculated Draft EIR, travel time between the Atlantic station (relocated/reconfigured) and the terminal station at Lambert would be approximately 22.6

minutes. The travel time from the existing Atlantic Station to Union Station in downtown Los Angeles is approximately 24 minutes.

## I-28: Hue Doan

### Comment I-28-1

Please do not build it near Greenwood. This train will cause congestion and bring the homeless to our neighborhoods. I take the gold line for 4 years and there is always a homeless problem where they sleep on the trains.

### Response to I-28-1

See Response to Comment I-21-1 regarding congestion and Response to Comment A-8-19 regarding security and people experiencing homelessness.

### Comment I-28-2

Crime will increase in my neighborhood.

### Response to I-28-2

As described in Section 3.13.6.1 of the Recirculated Draft EIR and as identified PM PSR-1, Metro shall supplement existing police protection services by providing Transit Services Bureau officers and contracted police services at all new LRT facilities, as needed to ensure that adequate police protection services are provided. See also Response to Comment I-7-3.

## I-29: Alice Serna

### Comment I-29-1

I totally oppose phase II of this project going down Washington Blvd. I really don't believe any thought was given regarding the properties that are currently on the route.

### Response to I-29-1

The commenter's opposition to Alternatives 1 and 3 is noted. Impacts to properties located along the alignment are addressed in the impacts analysis of each resource topic addressed in Chapter 3 of the Recirculated Draft EIR. Property acquisition has been minimized where feasible, and was a key consideration during development of the Build Alternatives.

### Comment I-29-2

Our home shakes now with all the traffic and we get so much fine dust. I know with construction this would be even worse. Please contact me to discuss.

### Response to I-29-2

Section 3.2, Air Quality, of the Recirculated Draft EIR provides analysis of potential air quality impacts in association with dust particles. Section 3.11, Noise and Vibration, of the Recirculated Draft EIR provides analysis of potential vibration impacts associated with the Project. As described therein, construction air quality impacts would be less than significant, and construction vibration impacts would be less than significant with implementation of mitigation.

## I-30: Lorena Hernandez

### Comment I-30-1

I am a Montebello resident living off of S. Bluff Rd. and Washington Bl. I am not for this plan. The congestion on Washington Bl. Is already a nightmare. To have to endure not only the construction, but the long term of effects of traffic is not ideal.

### Response to I-30-1

The commenter's opposition to the Project is noted. See Response to Comment I-21-1 regarding congestion. See also Section 3.14, Transportation and Traffic, regarding traffic impacts.

## I-31: Ernie Macias

### Comment I-31-1

I support this project. 100% public support.

### Response to I-31-1

The commenter's support for the Project is noted.

## I-32: Eugenia Falcon

### Comment I-32-1

I am concern of what this project would do to my community as well as the traffic too. * I don't agree on this plan of transportation

### Response to I-32-1

The commentor's opposition to the Project is noted. The commenter is referred to Section 3.12, Population and Housing, Section 3.13, Public Services and Recreation, and Section 3.14, Transportation and Traffic, of the Recirculated Draft EIR for a detailed discussion of impacts related to these resources from operation and construction of the Project. These sections have been revised in the Final EIR, although the impact conclusions remain the same. A brief summary of impacts related to these resource topics is provided below:

- Population and Housing: As identified in Section 3.12, operation and construction of the Project would result in less than significant impacts on population and housing and no mitigation is required.
- Public Services and Recreation: As identified in Section 3.13, operation and construction of the Project would result in less than significant impacts on public services and no mitigation is required.
- Transportation and Traffic: As identified in Section 3.14, operation and construction of the Project would result in less than significant transportation impacts, with implementation of mitigation.

### Comment I-32-2

*it is going to have a major impact on the value of my home

### Response to I-32-2

The commenter's concern about property values is noted. Also see Response to Comment B-2-9. The financial concerns expressed in the comment do not pertain to the environmental analysis in the Recirculated Draft EIR and no further response is required.

### Comment I-32-3

*It is an Environment concern

a total benefit for politicians and not to the general well being of the community.

### Response to I-32-3

The commenter's opposition to the Project is noted. See Response to Comment B-2-11 regarding the Project objectives.

## I-33: Ernest and Lisa Valentino

### Comment I-33-1

We have been Whittier residents for 30 years and we DO NOT wish to have the Eastside Transit Corridor Phase 2 line come to the City of Whittier for the following reasons:

### Response to I-33-1

The commenter's opposition to Alternative 1 is noted. See Responses to Comment I-33-2 and I-33-3 below.

### Comment I-33-2

1. We have seen first-hand the problems with homelessness around the stations and on the trains at existing stations. Our daughter works for an airline and rides the C lIne at least once a week from Norwalk to Aviation Station. We drop her off and pick her up at Norwalk Stations. There are transients around the station at every hour of the day. There are homeless and transients on the train s also. The trains have become a homeless hotel and no one is doing anything about it. What are you waiting for? For someone to be attacked, injured or killed? We only allow our daughter to ride the train during the daylight hours, because at night there are more transients on the train and it just isn't safe anymore.

2. Our concern is that, unless you address the situation with the transient population, the new Line will exacerbate the problem outlined in Item 1. In the last few years, we have had many problems with crime in our city. We believe that bringing a station to Whittier could potentially bring more crime and more violence to our city.

### Response to I-33-2

See Response to Comment A-8-19 regarding security and people experiencing homelessness and Response to Comment I-7-3 regarding crime.

### Comment I-33-3

3. We already have a problem with traffic in our city. We do not need any more congestion. There are no freeways in Whittier, therefore everyone has to travel on surface street. Has anyone done a study on how the Metro Station would impact traffic in our city?

The above issues need to be addressed and resolved prior to bringing the new Metro Line to the Whittier area.

Thank you.

### Response to I-33-3

See Section 3.14, Transportation and Traffic, of the Recirculated Draft EIR which evaluates traffic impacts. As described therein, operational impacts would be less than significant and construction impacts would be less than significant with implementation of mitigation. Additionally, see Response to Comment I-21-1 regarding traffic congestion and Response to Comment A-10-2 regarding the CEQA requirements for determining significant transportation impacts.

## I-34: John Carrillo

### Comment I-34-1

This Metro proposal will be a nightmare for Montebello, Pico Rivera and the other communities that share Washington Boulevard. This street has six lanes, three going west and three going east. In the afternoon rush it can hardely keep up with the volume of traffic. To cross traffic light intersections it takes two signal changes. This is especially true of east Montebello and all of Pico Rivera. This proposal will reduce the existing six lanes to just four. This makes no sense. There aren't enough people, and there never has been, using the Metro that would alleviate any traffic congestion. The reverse is certainly true, that it would hold up more traffic. For the sake of the affected areas, please reconsider.

### Response to I-34-1

The commenter's opposition to the Project is noted. See Section 3.14, Transportation and Traffic, of the Recirculated Draft EIR which evaluates traffic impacts. As described therein, operational impacts would be less than significant and construction impacts would be less than significant with implementation of mitigation. Additionally, see Response to Comment I-21-1 regarding traffic congestion and Response to Comment A-10-2 regarding the CEQA requirements for determining significant transportation impacts.

## I-35: Michel

### Comment I-35-1

Building a transit will cause chaos on Washington Blvd...where there's already chaos. Our community does NOT want the transit built.

### Response to I-35-1

The commenter's opposition to the project is noted. Regarding environmental impacts, see Response to Comment I-4-3. Regarding the project need, see Response to Comment I-10-5.

## I-36: Diana Gomez

### Comment I-36-1

I would like to give some insight on the reasons why this project should be shutdown immediately. First of all, the city of Pico Rivera has already two train tracks that were causing hazardous traffic congestions and an underpass had to be built to resolve those issues. In 2012 an underpass located on Passons costs residents/taxpayers 43.5 million a recent opened underpass on Durfee costs residents/taxpayers 107 million dollars. The main reasons why these underpass were built was to relieve traffic congestion for our residents, commuter delays and it was causing first responders delay in care due to traffic.

### Response to I-36-1

The commenter's opposition to the Project is noted. See Response to Comment I-21-1 regarding congestion.

As stated in Section 3.14.6.4.1 of the Recirculated Draft EIR, operation of the Project would potentially increase fire and police protection response times as a result of delays at new grade crossings. Grade crossings, particularly those along Washington Boulevard between Greenwood Boulevard and Lambert Road, could potentially delay fire and police protection vehicles if they arrive at a crossing at the same time as a passing train. However, delays would be brief due to the short length of the trainsets and the short time required for LRT vehicles to enter and exit the crossings. Given that trains would be operating in exclusive street-running right-of-way (ROW) at these locations, it would be possible for trains to clear signaled and unsignalized intersections quickly to allow emergency vehicles to pass. Further, the Project would be designed in accordance with the Metro Rail Design Criteria (MRDC), including the Fire/Life Safety Criteria, to ensure safety and minimize potential hazards at all locations. As discussed in Section 3.13.6.1 of the Recirculated Draft EIR, compliance with code requirements pertaining to emergency vehicle access and building standards ensure that response times are maintained at acceptable levels. As standard practice and as identified in PM TRA-1, Metro would coordinate with fire and police protection officials when designing grade crossings to ensure that access for police and fire protection services would be maintained under Alternative 1. As indicated on page 3.14-40 of the Recirculated Draft EIR, it is anticipated that emergency response times would remain at acceptable levels.

### Comment I-36-2

In addition, pollution emissions were also a factor, cars waiting in the train crossing increases pollution for our residents.

### Response to I-36-2

As shown in the Alternative 1, 2, and 3 Traffic Summary and the Traffic Emission Factors Summary subsections of Attachment C of the Air Quality Technical Report (Appendix C of the Recirculated Draft EIR), regional and project area average vehicle speeds were considered during the analysis of operational vehicle emissions. While average project area and regional vehicle speeds would differ between the No Build and Build Alternatives, the difference would be negligible, resulting in no difference between the alternatives when rounded to the nearest mile per hour. Further, as indicated in Sections 3.2.6.2 and 3.2.6.3 of the Recirculated Draft EIR, implementation of any of the Build Alternatives would result in a reduction to criteria pollutant emissions and would not result in vehicle counts which could have the potential to result in irregularly high carbon monoxide concentrations (CO Hot Spots) from vehicle idling.

### Comment I-36-3

Furthermore, train crossing is not safe for our kids walking to school and pedestrians crossing, this train crossing will cause a safety issue and a dangerous environment for our children. In. 2005 a 14 year old El Rancho high school student was killed at the Passons train crossing which was one of the reasons the underpass was built. This train crossing posses a safety issue for our first responders, our children and pedestrians, it makes it more dangerous for our kids to walk freely in our beautiful city of Pico Rivera. Stop this project in the beginning footsteps and help save the lives of our children in the future.

### Response to I-36-3

The Project would limit vehicle and pedestrian crossings with a barrier along the median of Washington Boulevard, except at controlled intersections. The Project would integrate measures to maximize safety for the surrounding communities. As discussed in Section 3.14.6.1, Transportation and Traffic, of the Recirculated Draft EIR and as identified in PM TRA-1, unsignalized left turns and pedestrian crossings shall be controlled using best practice safety measures (e.g., curbs and fencing to prevent uncontrolled left-turns, high visibility curbs between roadway and guideway, mid-block crosswalks, signal-protected pedestrian movements, channelization, barriers to protect and route pedestrians, Americans with Disabilities Act [ADA]-compliant curb ramps, and warning signs). Considering the safety measures included above, the transportation analysis concluded that the Project would not result in significant impacts to pedestrian safety. See also Response to Comment I-36-1 above.

## I-37: Oswald Ruiz

### Comment I-37-1

How much influence does the City of Commerce and the Citadel have on this project? It appears from the alternatives that every listed option makes it a point to include a station at the Citadel, Commerce. Being a resident of East Los Angeles for many years, I have witnessed first hand how often the best interest future young generation of East LA is not a top priority. Atlantic is beyond congested as it is. It serves mostly as a direct pass through to commerce for many delivery trucks, leaving behind significant amounts of added air pollution. In a way, there should be an ethical responsibility for Commerce to consider how much of East LA it utilizes on a daily basis. In my honest humble opinion, it appears as though the Gold line extension will serve Citadel Commerce in its best interest, but has it taken into consideration its neighbor to the North?

### Response to I-37-1

As described in Appendix T, Alternatives Withdrawn from Further Evaluation, of the Draft Recirculated EIR, the area in Commerce surrounding the Citadel showed the highest ridership catchment in the Project's ridership model. The 2009 Alternatives Analysis which serves as Attachment A of Appendix T of the Draft Recirculated EIR defines the Citadel Regional Shopping Area as an Activity Center/Destination.

See Response to Comment CO-4-1 regarding existing conditions in East Los Angeles. See Response to Comment I-4-3 regarding environmental impacts associated with the Project. See Response to Comment B-2-9 regarding equity.

### Comment I-37-2

I have even heard from Deputies of the East LA Sheriffs department noting that Commerce often requests additional patrol in its City, taking away value resources for East LA and other unincorporated communities. Isn't Commerce incorporated? Shouldn't they be able to afford their own patrol? Again, it appears as an example of a City looking out only for its best interest.

### Response to I-37-2

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR. See Response to Comment I-7-3 regarding safety and security.

### Comment I-37-3

The way many residents see it is, if the Gold line is to benefit communities, is it truly doing so by making best use of its budget once, so future generations can benefit and not have make considerable corrections/expenses in the future.

### Response to I-37-3

See Response to Comment I-9-2 regarding project cost. See also Response to Comment B-2-11 regarding need and project objectives.

## I-38: Beatriz Sanchez

### Comment I-38-1

Yes, I really want the line to Whittier.

### Response to I-38-1

The commenter's support for Alternative 1 is noted.

## I-39: Rebecca Sanchez

### Comment I-39-1

Love the idea of extending the Gold Line & public transportation is great to have accessibility to it.

### Response to I-39-1

The commenter's support for the Project is noted.

## I-40: Alex Ortiz

### Comment I-40-1

I do not want this. The metro is no good in a city with a lot of drivers. The metro is causing too much traffic. 3rd st and mednik ave train signals do NOT work, it is as if there is always a train passing causing rush hour traffic times for people on mednik, which is awful at 4am. If anything, if you want to make a Californian from east los angeles happy, get rid of the metro at pomona blvd

and atlantic blvd and at mednik ave and 3rd st PLEASE. Do NOT spend my tax dollars on this project PLEASE.

### Response to I-40-1

The commenter's opposition to the Project is noted. Addressing traffic impacts associated with the existing Metro E Line (formerly the Metro L [Gold] Line) is outside of the scope of the Recirculated Draft EIR. For information on traffic congestion relative to the Project, see Response to Comment I-21-1.

## I-41: Marlene Duenas

### Comment I-41-1

I want to start off by saying this is the worst idea ever. It will pass by a super transited area which will equal to more traffic.

### Response to I-41-1

The commenter's opposition to the Project is noted. Existing transit conditions in the project area are described in Section 3.14.5 of the Recirculated Draft EIR. See Response to Comment I-21-1 regarding traffic congestion.

### Comment I-41-2

It will also go through neighborhoods with grade schools K-12. By passing the metro through those streets our children will not be safe nor are we.

### Response to I-41-2

See Response to Comment I-36-3 regarding pedestrian safety.

### Comment I-41-3

It will bring more noise, homelessness, violence and chaos. That is something we do not need in family neighborhoods.

### Response to I-41-3

The commenter is referred to the Table ES-2 in the Executive Summary of the Recirculated Draft EIR. This table provides a summary of impact evaluations for all resource topics considered in the Recirculated Draft EIR, including required mitigation measures for potentially significant impacts.

The commenter is referred to Section 3.11, Noise and Vibration, of the Recirculated DEIR for a detailed discussion of impacts related to these resources from operation and construction of the Project. As identified therein, operation and construction of the Project would result in less than significant impacts from noise and vibration, with implementation of mitigation.

See Response to Comment A-8-19 regarding security and people experiencing homelessness and Response to Comment I-7-3 regarding crime.

## I-42: john

### Comment I-42-1

I own a business on the intersection of washington blvd in Pico Rivera. This project will devestate our business, my employees, and the future of our family. This is a costly bill that will waste millions and millions in taxpayer dollars, mostly at the expense of small family business owners which have been job creators for the local community.

### Response to I-42-1

See Response to Comment A-8-21 regarding impacts to small businesses. See Response to Comment I-9-2 regarding project cost.

### Comment I-42-2

Worse yet, these projects tend to have lower ridership historically, and thus will be to no avail. I am strongly against this proposal.

### Response to I-42-2

The commenter's opposition to the Project is noted. See Response to Comment I-13-1 regarding ridership.

## I-43: Frank Ventura

### Comment I-43-1

Hello, My main concern for this project is the traffic. 1. Atlantic blvd North and South is one of the main streets used to avoid the 5 fwy , 60 fwy, and 710 fwy. Putting a metro train through Atlantic blvd will cause three times more traffic on our streets and community. The damage caused to our community with the 3rd street project is unforgivable. I don't use 3rd st anymore due to the congestion caused by the train project. - Closing additional lanes for the track will cause traffic congestion. - There are two schools and a third being built on Atlantic Blvd. Throughout the school year traffic in the community at mid mornings and afternoon with parent dropping off and picking up students is already bad. If not for the additional lane on Atlantic Blvd traffic would be at a stand still. - There will be more traffic in our residential area. I live on 6th St. and we constantly have car using 6th st as a short cut to avoid using Atlantic Blvd.( north & south) ,Whittier Blvd (east &west) , and Beverly Blvd (east & west).

### Response to I-43-1

All Build Alternatives proposed would be in an underground configuration under Atlantic Boulevard using a tunnel boring machine to minimize disruptions to surface traffic.

As stated in 3.14.6.1.1 of the Recirculated Draft EIR, Alternative 1 would result in a reduction in general-purpose travel lanes from three lanes to two lanes. Parallel east–west routes (e.g., Telegraph Road, Olympic Boulevard, Whittier Boulevard) would continue to serve as alternatives to Washington Boulevard, providing additional connections to and from the regional freeway network. As such, changes in general-purpose travel lanes would be consistent with local and regional circulation elements and plans. Therefore, operation of the Project would result in less than significant impacts related to traffic circulation.

### Comment I-43-2

- We have no support from Law enforcement to make sure drivers are obeying or abiding by residential street laws.

### Response to I-43-2

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR.

### Comment I-43-3

My last comment regarding this project is no one on the project committee, contractor, or so called community representative live in this area and could care less how this will impact the community. The only concern for them is to complete the project to get paid and use this for political gain. Every person that uses public transportation if had a choice would rather drive his/hers own vehicle. I hope this project does not run down Atlantic Blvd. in our Hispanic/Latino community. This is a horrible idea and hope it does not happen.

### Response to I-43-3

The commenter's opposition to the Project is noted.

## I-44: Aurelia Ayala

### Comment I-44-1

Me parece una excelente idea la extensión Gracias

[Translation: The extension looks like an excellent idea to me. Thank you]

### Response to I-44-1

The commenter's support for the Project is noted.

## I-45: Rita Rojas

### Comment I-45-1

Extending the metro would not be necessary. 1.The first and most important reason. Extending the the metro to suburban areas with high median household income defeats the purpose of having a metro in the first place. The metro should be in low income neighborhoods where it is needed.

### Response to I-45-1

Section 2.2 of the Recirculated Draft EIR explains there is no rail connection for communities located to the east of Atlantic Station in Los Angeles County. Many residents within the general study area (GSA) encounter long travel delays connecting to and from downtown Los Angeles and beyond. If unaddressed, these mobility challenges pose a risk to future population and economic growth, including challenges for transit dependent populations, pedestrian and bicycle safety, capacity constraints on existing infrastructure, inefficiency of goods movement, poor air quality conditions, and other environmental considerations. If no action is taken, these transportation challenges will continue to grow.

Relative to low-income neighborhoods, the Recirculated Draft EIR presents demographic information, including income, in Section 3.12 and Section 3.17 of the Recirculated Draft EIR. As shown in Table 3.12-4 of the Recirculated Draft EIR, approximately 15 percent of households within a half-mile of the proposed stations are below the county poverty level. Also, see Response to Comment I-161-9 regarding revisions to Table 3.12-3.

### Comment I-45-2

2.Extending would cause profound traffic which is already a major issue. The streets that have metro railing in East Los Angeles (3rd and 1st) have to deal with cars waiting an extensive amount of time whilst the metro passes through. The extended metro line will be traveling through Atlantic and Washington Blvd. which are heavily traveled streets. It will lead to more time spent in cars traveling and more smog released. This will also increase the chances of speeding, car accidents and road rage which can lead to arguments and violence.

### Response to I-45-2

See Response to Comment I-21-1 regarding traffic congestion. Regarding smog, as identified in Section 3.2 Air Quality of the Recirculated Draft EIR operation and construction of the Project would result in less than significant impacts on air quality and no mitigation would be required. Regarding safety, Impact TRA-3, evaluated in Section 3.14.6.3 of the Recirculated Draft EIR, includes potential impacts related to roadway and geometric design hazards. As discussed in that section, with compliance with PM TRA-1 and PM TRA-2, the Project would have a less than significant impact relative to Impact TRA-3. These project measures are described in full in Section 3.14.7.1 of the Draft Recirculated EIR; PM TRA-2 has been revised in the Final EIR per Response to Comment A-5-1. The revisions to PM TRA-2 do not alter the impact conclusions of the Recirculated Draft EIR, including with respect to Impact TRA-3.

### Comment I-45-3

3.From my observations living here for a long time, the metro is not being used significantly in East Los Angeles or in Boyle Heights. All stations in East Los Angeles are never crowded. Occupants of the metro in east Los Angeles has reduced throughout the years.

### Response to I-45-3

Existing ridership conditions in the project area are described in Section 3.14.5 of the Recirculated Draft EIR.

### Comment I-45-4

4.Metro stations are not secure and unsafe at times. Throughout the years there have been shootings and sexual assaults at metro stations which does not make people feel safe traveling through metro. There is no security guard at stations until it is too late.

### Response to I-45-4

See Response to Comment I-7-3 regarding crime and safety.

### Comment I-45-5

Please do not extend the metro line. It is a waste of money that can be used on education and fixing other issues such as building affordable housing, offering more resources through social services, and helping the homeless.

There will be backlash before, during and after construction if this metro line is extended.

I speak for many people that agree with me on these points

### Response to I-45-5

The commenter's opposition to the Project is noted.

## I-46: Jorge Martinez

### Comment I-46-1

My family and local community are not in favor of the metro transit passing thru Washington Blvd. We have seen how these metro rails have destroyed communities by increase in crime and traffic. I will support all recalls and vote anyone involved out of office who was in favor of this project. We will not allow our community to be bullied into this project.

### Response to I-46-1

The commenter's opposition to the Project is noted. In See Response to Comment I-7-3 regarding crime and safety. See Response to Comment I-21-1 regarding traffic.

## I-47: Denise Gonzalez

### Comment I-47-1

Concerns: more homeless to Whittier from downtown

### Response to I-47-1

See Response to Comment A-8-19 regarding security and people experiencing homelessness.

### Comment I-47-2

-construction traffic/delays/inconvenience

### Response to I-47-2

As identified in Section 3.14, Transportation and Traffic, construction of the Project would result in less than significant transportation impacts with implementation of mitigation measure MM TRA-1, which, as discussed in Section 3.14.7.2 of the Recirculated Draft EIR and revised in the Final EIR, would require the preparation of a Traffic Management Plan that specifies measures to minimize disruption during construction, such as establishing detour routes and coordinating with local business owners and local jurisdictions.

### Comment I-47-3

-effect local businesses

-unable to drive across Washington Blvd from my residence to regular business locations, rerouted or detoured

### Response to I-47-3

See Response to Comment I-47-2 above. Additionally, as explained in Section 3.14.6.1 of the Recirculated Draft EIR, during operations, Alternative 1 would not preclude vehicle or truck access along Washington Boulevard, and left-turn movements would continue to be allowed to and from major cross-streets (e.g., Garfield Avenue, Greenwood Avenue) at signalized intersections as identified in PM TRA-1 (Section 3.14.7.1). In addition, parallel east–west routes (e.g., Telegraph Road, Olympic Boulevard, Whittier Boulevard) would continue to serve as alternatives to Washington Boulevard, providing additional connections to and from the regional freeway network. See also Response to Comment A-8-21 regarding small businesses.

### Comment I-47-4

-will become too congested on Washington Blvd, increased traffic

### Response to I-47-4

See Response to Comment I-21-1.

## I-48: Ms Martinez

### Comment I-48-1

I am writing to express my very strong opposition to having the Goldline in Whittier.

### Response to I-48-1

The commenter's opposition to Alternative 1 is noted.

### Comment I-48-2

The Environmental Report shows this is a horrible thing for our city and we should not have to pay the consequences of the greed of the Metro Board or Whittier City Council and other governmental factions.

### Response to I-48-2

The Recirculated Draft EIR was prepared to comply with CEQA and is a public disclosure document that objectively evaluates the environmental impacts of the Project to inform government decision-makers and the public of the environmental effects of a proposed activity and to avoid or reduce significant impacts of the activity when feasible to do so. A summary of impact evaluations for all resource topics considered in the Recirculated Draft EIR and identification of required mitigation measures to reduce significant impacts, is provided in Table ES-2 in the Executive Summary of the Recirculated Draft EIR.

### Comment I-48-3

The people of Whittier do not want this. Studies have shown that your Metro lines vaguely reduce traffic temporarily.

### Response to I-48-3

The commenter's opposition to the Project is noted. The commenter is referred to Section 3.14, Transportation and Traffic, of the Recirculated DEIR for a detailed discussion of impacts related to

these resources from operation and construction of the Project. As explained in Section 3.14.6.2 of the Recirculated Draft EIR, Alternative 1 would result in reduced VMT (approximately 10,000 daily) compared to the No Project Alternative. Additionally, as identified in PM TRA-1 (Section 3.14.7.1), components of the Project will include new or modifications to existing traffic signals to accommodate light rail movements and traffic circulation patterns at intersections, enhancements to existing signalized crosswalks, and bicycle circulation and access amenities in immediate station areas. As such, operation of the Project is not expected to lead to a substantial or measurable increase in vehicle travel.

### Comment I-48-4

The City of Whittier already has problems with high-density housing that is bringing more traffic and we have a huge homeless problem.

### Response to I-48-4

As discussed in Section 3.12, Population and Housing, of the Recirculated Draft EIR, the Project would not result in substantial changes to the existing population. As explained in Section 3.17.6.1 of the Recirculated Draft EIR, as a transit infrastructure project, The Project is not anticipated to directly foster growth since no housing would be constructed as part of the Project. The Project is designed to improve transit service to help accommodate the forecasted growth in the region's population and workforce. Land use controls, however, such as the establishment of high-density residential zones, lie with the local jurisdictions. See also Response to Comment CO-7-3 regarding the potential for the Project to serve as a catalyst for economic revitalization and growth. See Response to Comment A-8-19 regarding security and people experiencing homelessness.

### Comment I-48-5

The Metro will just bring more homeless people to Whittier. The Metro lines are extremely unsafe. You have no armed police officers on the trains or platforms. I took the Long Beach line once and all I saw was a dirty train and every platform was plagued with homeless people. My daughter and I witnessed a homeless person defecating on a platform and I saw no police in sight.

### Response to I-48-5

See Response to Comment A-8-19 regarding security and people experiencing homelessness and Response to Comment I-7-3 regarding crime.

### Comment I-48-6

WE DO NOT WANT the GOLDLINE IN WHITTIER. Regardless of whatever Council Member Dutra says, we do not want it.

### Response to I-48-6

The commenter's opposition to the Project is noted.

## I-49: Stephanie Vallejo

### Comment I-49-1

I am a long-time resident of Whittier and I am opposed to this project for many reasons.

### Response to I-49-1

The commenter's opposition to the Project is noted.

### Comment I-49-2

The Goldline has not been proven to reduce traffic nor has it been proven to be a safe mode of transportation.

### Response to I-49-2

Addressing traffic impacts associated with the existing Metro E Line (formerly Metro L [Gold)] Line) is outside of the scope of the Recirculated Draft EIR. See Response to Comment I-21-1 regarding traffic relative to the Project. See Response to Comment A-4-6 regarding pedestrian and vehicle safety.

### Comment I-49-3

I have taken the Goldline in East Los Angeles and all I saw were vagrants and a worn down/graffitied train. I did not feel safe. I recall seeing a homeless person drinking alcohol in front of me and throwing his can on the floor. I exited as soon as I could.

### Response to I-49-3

See Response to Comment A-8-19 regarding security and people experiencing homelessness.

### Comment I-49-4

As a long time resident, I oppose this project as it will harm our residents, businesses, quality of life, and undermine our safety

### Response to I-49-4

The commenter's opposition to the Project is noted.

## I-50: Gabriela Sanchez

### Comment I-50-1

This project will break the world record for most expensive transit project per new station, with the $5 billion initial subway to the Citadel serving only 4,122 new riders at 2 new stations.

### Response to I-50-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership. Regarding the commenter's description of the Project as a subway train to the Citadel Outlets, as discussed in Section 2, Project Description of the Recirculated Draft EIR, the Project is light rail that would, serve major activity centers including large educational institutions, such as Whittier College, and East Los Angeles Community College, recreation areas serving local residents, major retail and commercial centers (e.g., Citadel Outlets and the Historic Whittier Boulevard Shopping District), civic centers (Pico Rivera City Center), and medical centers (Whittier Presbyterian Intercommunity Hospital). Alternative 2 is the only alternative studied that would terminate in the city of Commerce. See also Response to I-37-1 regarding ridership near the Citadel Outlets.

### Comment I-50-2

Metro has bus lines stuck in congestion that serve much more people today, and rail projects that would serve almost 100,000 riders.

### Response to I-50-2

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment I-50-3

Why is Metro prioritizing this absurd waste of public resources for a $5 billion subway to an outlet mall next to a highway, in an industrial zone? The cost to benefit ratio of this project is too low to warrant a subway, and Metro should know this

### Response to I-50-3

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-50-1 regarding the commenter's description of the Project as a subway train to the Citadel Outlets.

### Comment I-50-4

Metro's other presentations show that rail is meant for the busiest corridors with the highest ridership, not for 4,122 riders or 11,000 riders.

### Response to I-50-4

The Metro E Line Eastside Extension (formerly Metro L [Gold] Line) is included in Measure M. As stated in Section 2.2 of the Recirculated Draft EIR, East Los Angeles County faces an increasing number of mobility challenges due to high population, employment growth, and a constrained transportation network. There is no rail connection for many communities and if left unaddressed, these mobility challenges pose a risk to future population and economic growth, including challenges for transit dependent populations, pedestrian and bicycle safety, capacity constraints on existing infrastructure, inefficiency of goods movement, poor air quality conditions, and other environmental considerations.

### Comment I-50-5

We demand to know why Metro is insisting this particular project is the right $5 billion solution to transit needs on the eastside, when better bus and BRT service could be implemented almost overnight for billions less, and across a wider area that serves more of the Eastside, not just Washington Blvd

### Response to I-50-5

See Response to Comment I-9-2 regarding the project cost. See Response to Comment CO-4-15 regarding alternatives to the Project that have been considered, including alternative modes.

## I-51: Miguel G

### Comment I-51-1

Please cancel this project.

Your whole presentation and speeches are geared towards approving this project, and you're not giving a fair shot of the No Build alternative.

### Response to I-51-1

The commenter's opposition to the Build Alternatives are noted.

### Comment I-51-2

This project is an incredible waste of money, with $5 billion for only 4,000 riders. Stop forcing this project on us

### Response to I-51-2

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership.

## I-52: David Gomez

### Comment I-52-1

We oppose this unnecessary project. The time it will take to get from Whittier to downtown LA will never encourage people to use the train instead of driving.

### Response to I-52-1

The commenter's opposition to the Project is noted. See Response to Comment I-10-5 regarding the project need. As identified in Section 3.14.6.1.1 of the Recirculated Draft EIR, travel time between the Atlantic station (relocated/reconfigured) and the Lambert station for Alternative 1 would be approximately 22.6 minutes, which would be approximately 9 minutes faster than the projected auto travel time (32 minutes) between these two points.

### Comment I-52-2

The train will always be slower, even with traffic. The current east side gold line is one of the slowest lines with the lowest ridership.

### Response to I-52-2

The commenter's assertion that the train will be slower, even with traffic is incorrect. As stated in Response to Comment I-52-1 above, travel time between the Atlantic station (relocated/reconfigured) and the Lambert station for Alternative 1 would be approximately 9 minutes faster than the projected auto travel time. See Response to Comment I-13-1 regarding ridership.

### Comment I-52-3

So few people use that East LA line now, so why are you doubling down on it? Fix the current line, fix your bus service in East LA.

### Response to I-52-3

See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership.

### Comment I-52-4

There are so many more cost effective solutions for transportation that would serve so much more than just the Citadel and Washington Blvd from Greenwood to Lambert.

### Response to I-52-4

See Response to Comment I-9-2 regarding project cost. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

### Comment I-52-5

Metro refuses to give a fair analysis of those other options because they are insititng on this over $6 billion subway as the only solution. Metro owes it to the public to reveal the real cost and benefits of this project, and whether other alternatives could achieve more (more riders, more benefits) for less than $6 billion.

### Response to I-52-5

See Response to Comment I-9-2 regarding project cost. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered, including alternative routing and alternative modes.

## I-53: Anonymous

### Comment I-53-1

Does Metro understand basic facts about public transit?

### Response to I-53-1

Metro has in-depth knowledge of and experience in public transit, including with respect to the planning, implementation, and management of a wide variety of transit projects. Metro employs professionals with high levels of experience, expertise and specialized training in all aspects of transportation, including the technical, financial, and social aspects public transit, urban planning, engineering, and traffic management. Metro continuously analyzes its own data and those of other transit systems and stays informed of best practices, new technologies, and transit trends. Metro also actively seeks regular feedback from passengers and community stakeholders, helping Metro to understand and address the needs and concerns of its riders, and to continuously improve Metro services. Additionally, as a public agency with a Board of Directors that includes multiple elected officials, Metro's discretionary decisions are accountable to the public. The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment I-53-2

Subways are the highest capacity and most expensive transportation solution and are usually built where ridership will be the highest in the system, not where it will only serve 4,000 riders.

### Response to I-53-2

The commenter's opposition to the Project is noted. See Response to Comment CO-4-15 for information on process for evaluation and screening of concepts, engineering and environmental refinements for the Project. See Response to Comment I-9-2 regarding project cost See Response to Comment I-13-1 regarding ridership.

### Comment I-53-3

Metro is burying the real costs and benefits of this project and not fairly analyzing the project from a neutral standpoint

### Response to I-53-3

See Response to Comment I-9-2 regarding project cost. Regarding the Project's environmental analysis, the Recirculated Draft EIR was prepared to comply with CEQA and is a public disclosure document that objectively evaluates the environmental impacts of the Project to inform government decision-makers and the public of the environmental effects of a proposed activity and to avoid or reduce significant impacts of the activity when feasible to do so.

### Comment I-53-4

Dutra and Solis have convinced Metro to ignore all reasoning and logic, in order to push a $5 billion subway to an outlet mall.

Please explain why

### Response to I-53-4

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-50-1 regarding the commenter's characterization of the Project as a subway to an outlet mall.

## I-54: Sergio Arambula

### Comment I-54-1

As a Whittier resident. I am looking forward to alternative route option 1 (east LA to Lambert). I am excited for the light rail to be expanded to my city.

### Response to I-54-1

The commenter's support for Alternative 1 is noted.

### Comment I-54-2

I am however a bit concerned about the amount of transmission lines we will be going under.

Specifically as we get closer to Whittier (200kV & 500kV). Have we looked at required clearances between SCE lines and the light rail conductor?

Will we have to mitigate SCE lines and what about the lower voltage lines?

What if we can't raise structure to a certain height?

### Response to I-54-2

As discussed in Appendix T, Alternatives Withdrawn from Further Evaluation, of the Draft Recirculated EIR, coordination with Southern California Edison has been conducted regarding the vertical clearance of their transmission lines. Clearance requirements have been considered and follow MRDC and CPUC General Order (GO)-95 standards which establishes requirements and safety standards for overhead line design, construction, and maintenance. Further coordination with SCE and other utility owners will be ongoing as the project progresses in preliminary and final design.

No vertical clearance conflicts have been identified along the Washington Alternative at this time. Overhead lines will be surveyed as part of on-going work to confirm clearances as the project design progresses to preliminary and final design.

Further, as described in Section 2.6 of Chapter 2 of the Recirculated Draft EIR, some utility relocation and installation would be required. However, the major transmission lines along the corridor would not require relocation or undergrounding based on the existing conceptual design of the Project.

### Comment I-54-3

Does that mean we will have to underground those lines?

And how will this affect our budget? These are all concerns that I have.

### Response to I-54-3

See Response to Comment I-54-2 above regarding vertical clearance. Undergrounding the transmission lines would not be required.

## I-55: Rose Morales

### Comment I-55-1

We have seen how these how these GRADE LEVEL metro lines have Environmentally destroyed single family residencies.

### Response to I-55-1

The Project would not require acquisition of residential structures; therefore, no housing would be displaced. See Response to Comment I-4-3 regarding environmental impacts.

### Comment I-55-2

Serapis street that connected from Slauson to Rex Road got got cut off due to all the train crossing accidents and deaths.

How can you honestly say our kids will be safe walking to El Rancho HS & Rivera Middle School crossing Washington Blvd thru Loch Allene and Passons.

### Response to I-55-2

Passons Boulevard would be a fully signalized intersection that includes left turn lanes for vehicles and fully signalized pedestrian crossings (see Sheet TR-W-123 in Volume 2 of the Recirculated Draft EIR). At Loch Alene Avenue, vehicles would be allowed make right turns only. Two at-grade signalized pedestrian crossings would be constructed to provide for safe pedestrian crossing of Washington Boulevard (see Sheet TR-W-122 in Volume 2 of the Recirculated Draft EIR). As with all grade crossings along Washington Boulevard, the crossings at Passons Boulevard and Loch Allene Avenue would be designed in accordance with Metro Rail Design Criteria (MRDC) to ensure safety and minimize potential hazards, as set forth in project measure PM TRA-1 (see Section 3.14.7, Transportation and Traffic, in the Recirculated Draft EIR. Best practice safety measures that would be implemented at these and all crossings along the alignment to minimize potential conflicts include signal-protected pedestrian movements, channelization, high visibility curbs between the guideway and roadway to prohibit vehicles from driving onto the tracks, barriers to protect and route pedestrians, ADA-compliant curb ramps, and warning signs. The Transit Cooperative Research Program provides guidelines for the safe and integrated movement of all traffic, including light rail vehicles (LRVs). These guidelines cover automatic gate placement, pedestrian control, and education and enforcement techniques to ensure the safety of pedestrians, including students, at light rail crossings. Therefore, pedestrians and students would be safe at crossings due to the implementation of various safety measures and education programs.

### Comment I-55-3

My family and local community are not in favor of the proposed Gold Metro line extension.

### Response to I-55-3

The commenter's opposition to the Project is noted.

### Comment I-55-4

I live off Lindsey Ave and Washington Blvd, where their is nothing but residential homes that run from Loch Allene all the way to the 605 FWY. The noise pollution and trembling from the trains passing thru will make living conditions unbearable.

### Response to I-55-4

See Section 3.11 of the Recirculated Draft EIR, which analyzes the impacts of operation and construction of the Project on ambient noise levels and generation of excessive ground-borne vibration or ground-borne noise levels in the vicinity of the Project. The analysis found that operation and construction of the Build Alternatives would result in less than significant impacts related to ambient noise levels and ground-borne vibration and noise in the project area with implementation of mitigation. A summary of mitigation measures is provided in Section 3.11.7.2, and a summary of impacts after mitigation is provided in Section 3.11.8.

### Comment I-55-5

Unless this train goes underground thru Pico Rivera as a registered voter I will make it my duty to support any recall or vote out any public official who was in favor of this project.

### Response to I-55-5

The commenter's opposition to an at-grade or aerial alignment is noted.

## I-56: Jorge Rodriguez

### Comment I-56-1

Montebello residents do not want this project and we demand that you cancel it.

### Response to I-56-1

The commenter's opposition to the Project is noted.

### Comment I-56-2

This project will create havoc on Washington Blvd and there's no reason why we need a train on Washington.

### Response to I-56-2

The commenter's opposition to the Project is noted. See Response to Comment I-4-3 regarding the environmental impacts. See Response to Comment I-10-5 regarding project need.

### Comment I-56-3

Please do not build any of these project options, they are all awful.

### Response to I-56-3

The commenter's opposition to the Project is noted.

## I-57: Adam Garcia

### Comment I-57-1

Metro is shoving this project onto communities that do not want it. The few people who say they will ride it don't even know how long it will take to reach downtown LA, the gold line is slow and not used in East LA and Metro is copying its mistakes again on Washington Blvd.

### Response to I-57-1

The commenter's opposition to the Project is noted. As identified in Section 3.14.6.1.1 of the Recirculated Draft EIR, travel time between the Atlantic station (relocated/reconfigured) and the Lambert station for Alternative 1 would be approximately 22.6 minutes, which would be approximately 9 minutes faster than the projected auto travel time (32 minutes) between these two points. The travel time from the existing Atlantic Station to Union Station in downtown Los Angeles is approximately 24 minutes.

### Comment I-57-2

Metro needs to listen to the community and all the other better options that could be implemented with a much lower cost.

### Response to I-57-2

See Response to Comment I-9-2 regarding project cost and Response to Comment CO-4-15 regarding alternatives to the project that have been considered. Additionally, see Chapter 6, Public Outreach, of the Recirculated Draft EIR regarding the public outreach for the Project.

### Comment I-57-3

All project alternatives should be eliminated and Metro needs to do a real study of what makes the most sense before you spend 6.5 billion dollars on this train to nowhere.

### Response to I-57-3

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment CO-4-15 regarding alternatives to the Project that have been considered, including alternative routing and alternative modes.

## I-58: Daniel T

### Comment I-58-1

As a resident of Montebello, I want Metro to know that my neighbors and I do not want this project built on Washington and we oppose our tax dollars going to this train.

### Response to I-58-1

The commenter's opposition to Alternative 1 and Alternative 3 is noted.

## I-59: Larry Whitmer

### Comment I-59-1

Instead of this $6 billion project that will cripple Washington Boulevard traffic and add noise and crime to our city, Metro and Solis and Dutra need to explore other ways to improve transportation.

### Response to I-59-1

Potential impacts related to traffic are addressed in Section 3.14, Transportation and Traffic, of the Recirculated Draft EIR, and potential noise impacts are addressed in Section 3.11, Noise and Vibration. As indicated in those sections, and as summarized in Table ES-3, Summary of Impact Evaluation of Recirculated Draft EIR, traffic and noise impacts will, with mitigation, be less than significant. See Response to Comment I-7-3 regarding crime. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered, including alternative routing and alternative modes.

### Comment I-59-2

Electric buses, BRT, express buses from Whittier to Downtown, would all work a lot better for a lot lower cost.

And you can use them serve a lot more communities and improve their bus ride almost immediately.

### Response to I-59-2

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered, including alternative routing and alternative modes.

### Comment I-59-3

Instead of this subway that will take at least 10 years to finish.

Project Manager Jenny keeps promising something by the Olympics, apparently based on some fantasy schedule that she isn't sharing with the public.

The project manager shouldn't lie to the community by promising something that isn't realistic.

### Response to I-59-3

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues. As stated in Section 2.8, Implementation Schedule, of the Recirculated Draft EIR, the Project was identified by the Metro Board as a priority project to be completed in time for the 2028 Olympics. However, as shown in Table 2-6, Project Timeline, of the Recirculated Draft EIR, due to the current funding availability, the Project would be operational in 2035.

## I-60: Maria Lopez

### Comment I-60-1

This EIR fails to make the case for this project and I strongly oppose any construction for this train on Washington.

### Response to I-60-1

The commenter's opposition to Alternative 1 and Alternative 3 is noted. The Recirculated Draft EIR was prepared to comply with CEQA and is a public disclosure document that objectively evaluates the environmental impacts of the Project to inform government decision-makers and the public of the environmental effects of a proposed activity and to avoid or reduce significant impacts of the activity when feasible to do so.

### Comment I-60-2

Metro needs to go back and come back with better solutions

### Response to I-60-2

See Response to Comment I-10-5 regarding the project need. Regarding alternatives to the Project that have been considered, including alternative routing and alternative modes, see Response to Comment CO-4-15.

### Comment I-60-3

Has Metro looked at Washington bus usage?

It's very low because everyone using this corridor is driving.

And they will all drive with this project too, but in traffic, because the train will always be slower and dirtier than driving.

### Response to I-60-3

Existing bus ridership is described in Table 6-1 and identified on maps provided in Appendix N of the Recirculated Draft EIR. Regarding travel time, see Response to Comment I-52-2. Regarding alternatives to the Project that have been considered, including alternative routing and alternative modes, see Response to Comment CO-4-15.

## I-61: Tony Guzman

### Comment I-61-1

No Build is the answer.

### Response to I-61-1

The commenter's support for the No Build Alternative is noted.

### Comment I-61-2

If Metro and Dutra insist on building this, we oppose anything on washington that isn't subway.

We will do everything we can to stop Metro from destroying Washington Blvd and copying what you did in East LA with the gold line.

### Response to I-61-2

The commenter's opposition to Alternative 1 and Alternative 3 is noted.

## I-62: Lucy Marquez

### Comment I-62-1

Please choose the no build or tsm alternatives.

### Response to I-62-1

The commenter's support for the No Project Alternative is noted.

It is understood that the Transportation Systems Management (TSM) Alternative referenced by the comment refers to an alternative evaluated in the 2014 Draft EIS/EIR. In the 2014 Draft EIS/EIR, the TSM Alternative was evaluated to comply with the Federal Transit Administration (FTA) implementing regulations' requirements for New Starts funding. These regulations required evaluation of a "baseline alternative," which generally represented the best that could be done without major capital investment. The TSM Alternative represented the "baseline alternative," and remained distinct from the No Build Alternative (required to be evaluated under the National Environmental Policy Act [NEPA]), which represents no federal action at all. Therefore, the 2014 Draft EIS/EIR evaluated both a No Build Alternative (no investment) and a TSM Alternative (non-major investment). As described in the 2014 Draft EIS/EIR, the TSM Alternative represented all

provisions of the No Build Alternative plus enhancements to east-west and north-south bus services in the project area.

In 2013, FTA published a Final Rule updating New Starts and Small Starts funding requirements (78 FR 1991, https://www.govinfo.gov/content/pkg/FR-2013-01-09/pdf/2012-31540.pdf). This rule amended CFR Title 49, Part 611 regulations on how FTA evaluates and rates major capital investments seeking funding under the New Starts and Small Starts programs. The rule removed the requirement that a "baseline alternative" be evaluated and adopted the use of a No Build Alternative. Consequently, Metro revisited the assumptions underlying the No Project Alternative and the TSM Alternative for the Recirculated Draft EIR. The No Project Alternative for the Recirculated Draft EIR assumes future capital and operational improvements to bus services and enhancements to east-west and north-south bus services in the area, including NextGen bus improvements; the differences with a TSM Alternative would be negligible. Therefore, the Recirculated Draft EIR does not, and was not required to, evaluate a separate TSM Alternative. The withdrawal of the TSM Alternative is addressed in Appendix T of the Recirculated Draft EIR. As also identified in Appendix T, it was determined in the 2014 Draft EIS/EIR that TSM Alternative was less successful than the LRT alternatives in leveraging transit investments. The TSM Alternative also resulted in the lowest reduction in VMT compared to the LRT build alternatives.

The No Project Alternative is described and evaluated in Section 5.4, Section 5.5, and Section 5.6 of the Recirculated Draft EIR. The No Project Alternative would have a lower capital cost and a lower operations and maintenance cost than Alternative 1, Alternative 2, or Alternative 3. However, the No Project Alternative would have significantly fewer benefits than the Build Alternatives and would not meet the project objectives that are identified in Section 2.2 and Section 5.2 of the Recirculated Draft EIR. Further, as stated in Section 5.7, the No Project Alternative would have the greatest number of significant and unavoidable impacts to environmental resources as it would be inconsistent and conflict with regional and local programs, plans, ordinances, and policies related to air quality, greenhouse gases, land use, and transportation.

## I-63: John M

### Comment I-63-1

I oppose the project and support the no build alternative.

### Response to I-63-1

The commenter's opposition to the Project and support for the No Project Alternative is noted.

## I-64: Carrie Gomez

### Comment I-64-1

Metro is not listening to the community, our opposition to this gold line extension, and other ways to improve transportation that doesn't dig up our streets for decades for a train that will only cause more traffic and serve very few people.

### Response to I-64-1

The commenter's opposition to the Project is noted. See Response to Comment I-21-1 regarding traffic increase. See Response to Comment CO-4-15 regarding the range of alternatives considered.

### Comment I-64-2

Metro, Solis and Dutra are all trying everything to convince us that this project makes sense, but the EIR numbers speak for themselves.

### Response to I-64-2

The commenter's opposition to the Project is noted. See Response to Comment I-10-5 regarding the project need. The commenter does not identify what "EIR numbers" are being referred to and therefore, a meaningful response cannot be provided.

## I-65: Sophia Marquez

### Comment I-65-1

I do not support this project and oppose any train that will run down Washington blvd.

### Response to I-65-1

The commenter's opposition to the Project in general and Alternatives 1 and 3 specifically is noted.

### Comment I-65-2

Please vote no on this project, Solis and Dutra do not speak for us and the community.

We want better bus service now, not this train extension.

### Response to I-65-2

The commenter's opposition to the Project is noted.

## I-66: Frank Gomez

### Comment I-66-1

Stop this eastside train project now, we did not ask for it and this 1,000 page DEIR document is too long for the community to properly review in just 60 days.

If you must go ahead with a project, Metro must choose no build or tsm based on all the facts and community input.

### Response to I-66-1

The commenter's opposition to the Project is noted. See Response to Comment CO-5-1 regarding the Recirculated Draft EIR review period. See Response to Comments I-62-1 regarding the TSM alternative.

## I-67: Y T

### Comment I-67-1

Montebello and Pico Rivera do not want this project and oppose all the build alternatives.

### Response to I-67-1

The commenter's opposition to the Project is noted.

## I-68: Tony Gonzales

### Comment I-68-1

All 3 alternatives fail to address any known transportation or transit issue in this corridor and Metro owes it to LA County residents to reveal how this project performs compared to all the other projects Metro is pursuing or can pursue if $5 billion in valuable taxpayer resources aren't sunk into an initial 3 mile subway to an outlet mall next to a freeway and industrial buildings.

### Response to I-68-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership. See Response to Comment I-50-1 regarding the commenter's characterization of the Project as a subway to an outlet mall.

### Comment I-68-2

Metro project manager Jenny Cristalles is stating outright lies by claiming heavy ridership on the eastside gold line and her own agency's numbers contradict what she claims to the community.

### Response to I-68-2

See Response to Comment I-13-1 regarding ridership.

### Comment I-68-3

Her condescending attitude towards those of who live on the Gold Line and experience it every day is not welcome, and she has demonstrated a clear bias in favor of building the full project.

She dismisses any other alternative or anything that does not involve building this subway to the Citadel, not caring about addressing the real transportation and transit needs of our communities.

### Response to I-68-3

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR.

### Comment I-68-4

We deserve better bus service today, not a 3 mile $5 billion subway to an outlet mall in a decade.

### Response to I-68-4

See Response to Comment CO-4-15 regarding alternatives to the Project that have been considered, including buses. See also Response to Comment I-10-5 and I-50-1 regarding project need and activity centers served by the Project.

## I-69: Jennifer F

### Comment I-69-1

Stop this project now and stay away from Washington Bl.

### Response to I-69-1

The commenter's opposition to the Project is noted.

## I-70: Frank Gomez

### Comment I-70-1

By moving forward with this crazy project, Metro's Board of Directors (especially Solis and Dutra) are ignoring and discarding their fiscal responsibility to approve projects that will have the biggest benefits and ridership for these incredible $6 plus billion investments.

### Response to I-70-1

See Response to Comment I-9-2 regarding the project cost, Response to Comment I-10-5 regarding Project need, and Response to Comment I-13-1 regarding ridership.

### Comment I-70-2

The public deserves the best projects that will serve the most amount of people possible given limited resources and taxpayer dollars.

### Response to I-70-2

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

## I-71: Diego Ramirez

### Comment I-71-1

Keep this train away from Pico Rivera and Montebello.

My neighbors and I are all opposed.

### Response to I-71-1

The commenter's opposition to Alternatives 1 and 3 is noted.

## I-72: Jason Fang

### Comment I-72-1

The streets you are proposing to extend the gold line on are already busy to begin with throughout the day.

### Response to I-72-1

See Response to Comment I-21-1 regarding traffic congestion relative to the Recirculated Draft EIR. See also Response to Comment CO-4-15 regarding alternatives to the Project that were considered, including alternative routing.

### Comment I-72-2

The idea to cause more traffic by closing out lanes for construction, turning 3 lanes to 2 lanes, and on top of that adding delay by drivers who are uncertain of what to do when they see a rail line in the middle of the street is absurd.

### Response to I-72-2

See Response to Comment I-43-1 and Response to Comment I-190-3 regarding changes to travel lanes. See Response to Comment I-21-1 regarding traffic congestion.

### Comment I-72-3

I drive through East LA all the time where this line is already implemented and if this is the future, it isn't working.

I see no benefit at all with this project.

### Response to I-72-3

See Response to Comment I-10-5 regarding the project need.

## I-73: Amy Ramirez

### Comment I-73-1

Please cancel this project. Our community and businesses cannot handle the 8 to 12 years it will take for construction.

### Response to I-73-1

The commenter's opposition to the Project is noted.

## I-74: Sammy Larson

### Comment I-74-1

This project is awful and needs to be canceled immediately. Stop wasting our tax dollars on a washington train that will barely have riders.

### Response to I-74-1

The commenter's opposition to the Project is noted. See Response to Comment I-13-1 regarding ridership.

## I-75: Tom Carter

### Comment I-75-1

Metro should select the no build option and look at other ways to bring better transit to the eastside with things like electric buses or upgrading the metrolink lines that are already there and already pass right by the citadel.

### Response to I-75-1

The commenter's support for the No Project Alternative is noted. See Response to Comment CO-4-15 regarding alternatives to the Project that have been considered. Metrolink is not operated by Metro nor under Metro's jurisdiction. Improvements to Metrolink service are outside the scope of the Recirculated Draft EIR.

## I-76: Sam Clark

### Comment I-76-1

Metro needs to stop this project and take a serious look at other ways $6.5 billion can be used to improve transportation in East LA, Boyle Heights, Montebello and Whittier.

### Response to I-76-1

The commenter's opposition to the Project is noted. See Response to Comment I-9-2 regarding the project cost. See Response to Comment CO-4-15 regarding alternatives to the Project that have been considered.

## I-77: Josefina S

### Comment I-77-1

I vote for the TSM alternative.

### Response to I-77-1

See Response to Comment I-62-1 regarding a TSM Alternative.

### Comment I-77-2

Do not touch Washington Blvd unless it's a full subway and you can finish construction within a year.

### Response to I-77-2

The commenter's opposition to Alternatives 1 and 3 is noted.

## I-78: Anonymous

### Comment I-78-1

I oppose this project and think Metro needs to study something else that will give our city more immediate traffic solutions that doesn't need a 7billion dollar subway through ELA.

### Response to I-78-1

The commenter's opposition to the Project is noted. See Response to Comment CO-4-15 regarding alternatives to the Project that have been considered.

## I-79: Maria Lopez

### Comment I-79-1

We oppose this project and support the no build or tsm alternatives.

### Response to I-79-1

The commenter's support for the No Project Alternative is noted. See Response to Comment I-62-1 regarding the TSM Alternative.

### Comment I-79-2

Stop wasting our tax money on a $6 billion train in a place where it doesn't belong.

### Response to I-79-2

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need.

## I-80: Larry Gomez

### Comment I-80-1

We request that Metro cancel this project.

### Response to I-80-1

The commenter's opposition to the Project is noted.

### Comment I-80-2

We do not want a train on Washington, and this project doesn't pencil out.

### Response to I-80-2

The commenter's opposition to Alternative 1 is noted. See Response to Comment I-9-2 regarding the project cost.

## I-81: M Thomas

### Comment I-81-1

The eastside gold line is slow and creates lots of problems on 3rd street.

### Response to I-81-1

Addressing perceived problems of the existing Metro E Line (formerly Metro L [Gold] Line) is outside of the scope of the Recirculated Draft EIR. Refer to Section 3.14.5.1 of the Recirculated Draft EIR for discussion of existing transit operations within the Detailed Study Area (DSA).

### Comment I-81-2

Metro should not expand it and needs to listen to the community.

We oppose this expansion.

### Response to I-81-2

The commenter's opposition to the Project is noted.

## I-82: Gary Peters

### Comment I-82-1

Why does Commerce get a subway but Montebello and Pico Rivera have to deal with Washington Boulevard impacts?

### Response to I-82-1

The commenter is referred to Table 1-1 of Appendix T, Alternatives Withdrawn from Further Evaluation, of the Draft Recirculated EIR. Table 1-1 Concepts and Alternatives Withdrawn identifies key reasons an aerial configuration along Garfield Boulevard at Commerce was eliminated. Additionally, an at-grade crossing analysis on Atlantic Boulevard concluded that an at-grade LRT at Commerce could result in non-mitigatable significant traffic/circulation and access impacts. As a result of these key reasons, the Project was designed as an underground configuration at Commerce.

### Comment I-82-2

This train extension should not go forward as Metro and Solis and Dutra are demanding.

### Response to I-82-2

The commenter's opposition to the Project is noted.

### Comment I-82-3

We want a Washington Blvd subway for the whole thing or do not build it at all.

### Response to I-82-3

The commenter's opposition to Alternatives 1 and 3 is noted.

## I-83: J Garcia

### Comment I-83-1

Why is Metro not giving a fair look at Whittier or Beverly instead of Washington?

### Response to I-83-1

The commenter is referred to Table 1-1 of Appendix T, Alternatives Withdrawn from Further Evaluation, of the Draft Recirculated EIR. Table 1-1 Concepts and Alternatives Withdrawn identifies key reasons why alternatives along Beverly Boulevard and Whittier Boulevard were eliminated. The basis for elimination of alternatives at Beverly Boulevard and Whittier Boulevard was analyzed in the 2009 Alternatives Analysis which is included as Attachment A of Appendix T of the Draft Recirculated EIR.

### Comment I-83-2

Washington barely has any bus service and there's no reason to put a train there.

### Response to I-83-2

Section 3.14.5 of the Recirculated Draft EIR describes currently existing bus services in the project area. See Response to Comment I-10-5 regarding project need.

### Comment I-83-3

Your map claims Whittier College as a destination but this won't even go there.

### Response to I-83-3

The commenter erroneously asserts that Whittier College is identified as a Project destination. The comment may be referring to Figure 2.5, Major Activity Centers, on page 2-9 of the Recirculated Draft EIR which shows Whittier College among other activity centers located in the region that would be served by the Project. As explained on page 2-5, the Project study area encompasses a general study area (GSA) that is regional in scope and scale and consists of a wider area that is expected to be served by the Project in addition to the detailed study area (DSA) that is within two miles of the alignment. The GSA currently has limited transportation options, which contributes to long travel delays connecting to and from downtown Los Angeles and as such, the region as a whole would be served by improved access to LRT. The discussion of the GSA and DSA goes on to describe regional activity centers within those boundaries that would support the Project, including Whittier College. The regional activity centers are shown on Figure 2.5.

## I-84: Francisco T

### Comment I-84-1

I don't want this project built, choose the no build, thank you

### Response to I-84-1

The commenter's opposition to the Project and support for the No Project Alternative is noted.

## I-85: Laura S

### Comment I-85-1

Metro, Solis and Dutra are forcing this project on us with a biased document that doesn't look at all the other cheaper and less destructive alternatives that could serve east county.

### Response to I-85-1

The commenter asserts that the Recirculated Draft EIR is biased, but does not provide any specific information in support of that assertion. Pursuant to CEQA, the Recirculated Draft EIR is a public disclosure document that objectively evaluates the environmental impacts of the Build Alternatives proposed by the Lead Agency and the No Project Alternative. It evaluates the impacts of all alternatives and identifies the environmentally superior alternative (Section 15126.6 CEQA Guidelines), but it does not make a recommendation to decision-makers (Metro Board of Directors). See Response to Comment CO-4-15 regarding alternatives to the Project that have been considered.

### Comment I-85-2

The no build alternative is the only one Metro should pick.

### Response to I-85-2

The commenter's opposition to the Project and support for the No Project Alternative is noted.

## I-86: D Lopez

### Comment I-86-1

Metro should look at BRT instead of the eir alternatives.

### Response to I-86-1

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

### Comment I-86-2

The subway train doesn't pencil out financially, it's 2 billion more than what we can build now.

### Response to I-86-2

See Response to Comment I-9-2 regarding project cost.

### Comment I-86-3

BRT can be done on corridors like Beverly and Whittier where there's more action than Washington.

### Response to I-86-3

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

## I-87: Ivan Y

### Comment I-87-1

This project cannot go forward the way Metro is planning it.

### Response to I-87-1

The commenter's opposition to the Project is noted.

### Comment I-87-2

Your document doesn't show why this project will help the eastside more than it will hurt it, with all your construction and business closures. Look at what you did to 3rd street.

### Response to I-87-2

The financial concerns expressed in the comment do not pertain to the environmental analysis in the Recirculated Draft EIR. However, it should be noted that relocation assistance and benefits would be provided to displaced businesses in compliance with state regulations and Metro's policies. See also Response to Comment I-10-5 regarding the need for the Project.

## I-88: Josh P

### Comment I-88-1

Why doesn't Metro look at ways to upgrade the metrolink lines in this area? one of them goes right by the citadel, you can just add a station there and save billions of dollars.

### Response to I-88-1

Metrolink is not operated by Metro nor under Metro's jurisdiction. Improvements to Metrolink service are outside the scope of the Recirculated Draft EIR. Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5.

## I-89: J D

### Comment I-89-1

Metro needs to look at what buses could do for this project. There's no need to tear up Atlantic and Washington for a train when buses can offer greater service and so much sooner.

### Response to I-89-1

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

## I-90: Ur Mom

### Comment I-90-1

How will this benefit all the homeless and elderly that will become house less after you destroy homes like you did with the last metro line. Fuck yall gentrifiers

### Response to I-90-1

As explained in Section 3.12.6.2 of the Recirculated Draft EIR, operation of the Project would occur within the transportation ROW and at the new stations. Under the Project, no acquisition of residential structures would occur; therefore, no people or housing would be displaced. See Response to Comment B-2-9 regarding social and economic impacts, such as gentrification.

## I-91: Samantha Gomez

### Comment I-91-1

Metro's math for this project makes no sense. A $5 billion subway to an industrial zone will not solve our transportation problems on the eastside. For $5 billion, we should get a lot more than just a first phase subway to Commerce.

### Response to I-91-1

See Response to Comment I-9-2 regarding the project cost. Regarding the project need, see Response to Comment I-10-5.

## I-92: Jay H

### Comment I-92-1

keep this train and metro's homeless and crime problem out of whittier! we are not long beach or santa monica and we don't want to ruin our city with useless train that will only bring more crime and traffic to our streets.

### Response to I-92-1

The commenter's opposition to the Project is noted. See Response to Comment A-8-19 regarding security and people experiencing homelessness. See Response to Comment I-7-3 regarding crime. See Response to Comment I-21-1 regarding traffic.

## I-93: T Clark

### Comment I-93-1

Do Metro staff also work for Solis and Dutra? Is that why Metro is letting them dictate this project and demand it be built no matter what and ASAP, even if there's no money for it to get to Commerce, let alone Montebello or Pico Rivera? Metro came up with the most expensive solution, for the lowest benefits to transit riders. Solis and Dutra are corruptly influencing this project for their own personal political benefit, at the expense of superior alternatives that can be done quicker, cheaper, and for the benefit of a lot more people.

### Response to I-93-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

## I-94: JD Lopez

### Comment I-94-1

We were promised a subway under Whittier Boulevard going west to east, not this one stop that will end at the citadel for decades because metro always runs out of money on these projects and opens years late. Build it right or don't build it at all.

### Response to I-94-1

See Response to Comment I-10-5 regarding the project need. See Response to Comment CO-4-15 regarding range of alternatives to the Project that have been considered, including alternative alignments.

## I-95: Jess Ramirez

### Comment I-95-1

I oppose this project and do not believe this EIR gives a fair look at so many other ways to spend $7 billion

### Response to I-95-1

The commenter's opposition to the Project is noted. See Response to Comment I-9-2 regarding the project cost. Section 5.1 of the Recirculated Draft EIR evaluates a reasonable range of alternatives as described in Section 15126.6(a) of the CEQA Guidelines. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

## I-96: JP Sanchez

### Comment I-96-1

This project needs to be stopped now. Don't bring more crime and homelessness to our cities.

### Response to I-96-1

The commenter's opposition to the Project is noted. See Response to Comment A-8-19 and Response to Comment I-7-3 which address security concerns, in terms of crime and homelessness.

### Comment I-96-2

This is a waste of taxpayer money and Metro is letting Solis and Dutra strongarm them into pushing this on the community no matter what it costs and how much it will impact our traffic and put a big strain on our police.

### Response to I-96-2

Regarding environmental impacts, see Response to Comment I-4-3. Regarding project costs, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5.

## I-97: Tom C

### Comment I-97-1

Metro should use the existing Metrolink train track land for this project, the land is already there and it's cheaper than a 6billion$ subway. The Metrolink tracks run right along the citadel too.

### Response to I-97-1

Metrolink is not operated by Metro nor under Metro's jurisdiction. Improvements to Metrolink service are outside the scope of the Recirculated Draft EIR. See Response to Comment CO-4-15 regarding the range of alternatives that were considered.

## I-98: Pete K

### Comment I-98-1

The light rail alternatives for this project make no sense. $6.5 billion for 4,000 riders is laughable and Metro should needs to figure out what else $6.5 billion could buy in terms of transit in the eastside cities. We strongly oppose any of the light rail build alternatives.

### Response to I-98-1

The commenter's opposition to the Project is noted. See Response to Comment I-9-2 regarding the project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership. It should be clarified that the cost cited in the comment is for Alternative 1 (the full 9.0 mile alignment) and the number of riders cited in the comment is for Alternative 2 (3.2 mile IOS).

## I-99: Anonymous

### Comment I-99-1

Metro is going to destroy our neighborhoods and traffic with this project and none of my neighbors want it.

### Response to I-99-1

See Response to Comment I-4-3 regarding environmental impacts including traffic.

### Comment I-99-2

Metro and Dutra are in cahoots to push this project regardless of the cost and lack of benefits f11or residents. Stop this project now before wasting millions more on a subway that few will ride.

### Response to I-99-2

The commenter's opposition to the Project is noted. Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1.

## I-100: Nancy W

### Comment I-100-1

Metro's CEO used to be the CEO of Metrolink - Metro should take advantage of this and look at ways to improve Metrolink service and add a station at the Citadel for billions less than a new subway line to the Citadel. I strongly oppose the alternatives Metro and Dutra are demanding be built at the expense of much more sound cost effective solutions

### Response to I-100-1

Metrolink is not operated by Metro nor is it under Metro's jurisdiction. Improvements to Metrolink service are outside the scope of the Recirculated Draft EIR.

## I-101: Maria L

### Comment I-101-1

Please do not bring this project into Montebello. We can't handle the homeless and crime from metro trains. All the homeless will be dropped off in our neighborhoods. but metro and dutra don't care.

### Response to I-101-1

The commenter's opposition to the Project is noted. See Response to Comment A-8-19 regarding security and people experiencing homelessness and Response to Comment I-7-3 regarding crime.

## I-102: Common Sense

### Comment I-102-1

The cost of this train extension has ballooned to 6 billion, for only 4,000 new riders. Does Metro have calculators? That's over $1.5 million per new rider in case Metro can't do the math. Explain why $1.5 million per rider is a wise investment. Does Metro always have to spend so much for its ridership?

### Response to I-102-1

Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1. It should be clarified that the cost cited in the comment is for Alternative 1 (the full 9.0 mile alignment) and the number of riders cited in the comment is for Alternative 2 (3.2 mile IOS).

## I-103: Juan

### Comment I-103-1

I vote for the no build alternative. The other alternatives don't make sense given their costs, impacts and low use.

### Response to I-103-1

The commenter's support for the No Project Alternative is noted. Regarding the project cost, see Response to Comment I-9-2. Regarding the project impacts, see Response to Comment I-4-3. Regarding ridership, see Response to Comment I-13-1.

### Comment I-103-2

Metro and Montebello need to look at improving service on its busiest bus routes before building a new train that will divide our community and create a giant barrier on Washington.

### Response to I-103-2

See Response to Comment I-10-5 regarding the project need. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered. The commenter states that building the Project would create a barrier on Washington Boulevard. However, this is not the case. The commenter is referred to Section 3.10.6.1 of the Draft Recirculated EIR, which addresses whether the Build Alternatives would physically divide an established community (Impact LUP-1). As identified therein, the operation of the Project would still allow left-turning traffic and pedestrian access via crosswalks at signalized intersections and surrounding land uses would continue to have access to the surrounding roadway, bicycle, and sidewalk network. The addition of permanent light rail guideway infrastructure on an existing roadway would not physically divide existing neighborhoods, communities, or land uses to the extent to which they would be disrupted or isolated and would have a less than significant impact.

## I-104: Ernest Valentino

### Comment I-104-1

we oppose the Metro Line coming to Whittier, until the high crime caused by transients in LA County is resolved.

### Response to I-104-1

The commenter's opposition to Alternative 1 is noted. See Response to Comment A-8-19 regarding security and people experiencing homelessness and Response to Comment I-7-3 regarding crime.

### Comment I-104-2

Something you need to look at is: Olympics coming to Los Angeles in 2028. LA City will want to clean up all of homeless sites in the city before the Olympics. Where are they going to do with all of the transients? Are they going to farm them out and moved the out to our cities?

We are at the Norwalk station every week and our daughter rides the trains. Until you resolve the transient problem, we DO NOT wish to have a Metro Station in our City.

Thank you

### Response to I-104-2

The commenter's opposition to Alternative 1 is noted. See Response to Comment A-8-19 regarding security and people experiencing homelessness.

## I-105: A T

### Comment I-105-1

This EIR is impractical. Metro isn't able to fund the Gold Line extension to Claremont but wants to build a new subway extension for billions more than Metro has in funding. Metro needs to go back to the drawing board and come up with something that's financially feasible and provides the best transit possible for East LA and the cities east of East LA.

### Response to I-105-1

The statement that the EIR is impractical is not clear and as such cannot be provided with a response. The Recirculated Draft EIR was prepared in compliance with CEQA and the CEQA Guidelines. See Response to Comment I-9-2 regarding the project cost. See Response to Comment CO-4-15 regarding the range of alternatives that have been considered.

## I-106: Rob Garcia

### Comment I-106-1

I support the No Build Alternative. Thank you

### Response to I-106-1

The commenter's support for the No Project Alternative is noted.

## I-107: Jamie Hwang

### Comment I-107-1

I support Alt 1 with the MSF in Montebello.

### Response to I-107-1

The commenter's support for Alternative 1 and the Montebello MSF site option is noted.

### Comment I-107-2

Stopping the line extension short of Whittier would be an extremely poor investment in public transportation in the long run. I live in a mixed-use development off of Whittier between Sorenson and Washington/Lambert, and our community desperately needs alternatives to driving. If we had access to a line that can take us to LA, it would reduce parking issues, improve air quality, and reduce traffic/speeding problems in our community.

### Response to I-107-2

The commenter's opposition to Alternative 2 and Alternative 3 and support for Alternative 1 is noted.

## I-108: JD Lopez

### Comment I-108-1

The project should be 100% in a subway, especially on Washington, or it should not be built. Commerce gets a subway, where almost nobody lives, but Montebello, Pico Rivera and Whittier all get heavier traffic.

### Response to I-108-1

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered, including various Project configurations. See Response to Comment A-10-5 regarding grade separation.

## I-109: Donna Cruz

### Comment I-109-1

I have lived in Whittier for 32 years. We have public transportation available already. I appreciate that the freeways do not run through this city. Bringing the train through Whittier will only bring more crime and homelessness. I am against the train coming through Whittier.

### Response to I-109-1

The commenter's opposition to Alternative 1 is noted. See Response to Comment A-8-19 regarding security and people experiencing homelessness and Response to Comment I-7-3 regarding crime.

## I-110: Gerardo Madrigal

### Comment I-110-1

Our main concern is the traffic delays this will create both during construction and operation. The gold line on pomona/3rd street already runs extremely slow during rush hour. I lived to see that street run faster before the train arrived. Given our population increase to double by 2050, this will create havoc unless people started opting to take the train instead of drive their own vehicles.

### Response to I-110-1

See Response to Comment I-21-1 regarding congestion.

### Comment I-110-2

My take is go underground.

### Response to I-110-2

The commenter's opposition to an at-grade or aerial configuration is noted. See Response to Comment A-10-5 regarding grade separation.

## I-111: Michelle Rodriguez

### Comment I-111-1

Metro needs to cancel this boondoggle now, before LA County wastes over $6 billion for the least useful transit line possible in southern California. The no build and no project is the only sound alternative the Metro Board can choose unless they want to flagrantly waste billions in taxpayer funding.

### Response to I-111-1

The commenter's support for the No Project Alternative and opposition to the Build Alternatives is noted. Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5.

## I-112: Metro IsCorrupt

### Comment I-112-1

Metro wants to build a $5 billion subway line to an outlet mall for 4,000 new riders over 10 years from now, less than what Metro serves at just 1 of their many rail stations today and less than what Metro's busiest buses serve at just 1 of their stops. How can Metro make the case for a subway train that will only benefit 4,000 riders when there are other projects that will benefit ten times as many riders for a lower cost?

### Response to I-112-1

Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1. Regarding the commenter's characterization of the Project as a subway to an outlet mall, see Response to Comment I-50-1.

## I-113: P Johnson

### Comment I-113-1

Fernando Dutra is colluding with Metro staff to build this project no matter what the community says and no matter how small the gain will be for over $6 Billion spent in public taxpayer funds. Dutra is forcing Metro staff to ignore the fact that this project doesn't make any financial sense and will serve less people after 10 years of construction and $6 billion spent than many Metro buses do today.

### Response to I-113-1

Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1. The

Recirculated Draft EIR evaluates the impacts of all alternatives and identifies the environmentally superior alternative (Section 15126.6 CEQA Guidelines), but it does not make a recommendation to decision-makers (Metro Board of Directors). The decision of whether to approve the Project rests with the Metro Board of Directors, not Metro staff.

## I-114: Donald R.

### Comment I-114-1

My sister takes the bus to and from work. I'm sure the Metro buses are vital to her commute from work, and goes as well to the citizens who also take the bus.

### Response to I-114-1

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

## I-115: Aurera Camarena

### Comment I-115-1

They take care of people that or Anicad give good segection Aurorac.

### Response to I-115-1

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

## I-116: N/A

### Comment I-116-1

- concerned of homeless population riding the new extended transit line.

### Response to I-116-1

See Response to Comment A-8-19 regarding security and people experiencing homelessness.

### Comment I-116-2

- wants to ensure that there are facts/studies done to provide relevancy for the project.

### Response to I-116-2

The Project was initiated in 2007 and the Eastside Transit Corridor Phase 2 Alternatives Analysis (AA) was published in 2009. The AA Report conducted technical studies and established the purpose and need of the project by defining mobility challenges and developing project goals and objectives within the study area. The AA Report also identified and assessed transportation alternatives to be studied further in the environmental process. In October 2009, the Metro Board authorized staff to advance environmental analysis for the Eastside Transit Corridor Phase 2 Project. The AA Report, which is provided in Appendix T, Attachment A, of the Recirculated Draft EIR, describes the screening process and evaluation criteria for selecting alternatives for further

study. Additional information on the evolution and selection of the Project evaluated in the Recirculated Draft EIR is provided in Appendix T, Alternatives Withdrawn from Further Evaluation. See also Section 2.2 in Chapter 2, Project Description, of the Recirculated Draft EIR, which presents the project objectives, including enhancing mobility and access throughout the region and see Response to Comment CO-4-15.

## I-117: Gabby M

### Comment I-117-1

This project needs to be stopped before it tears up our streets for years and adds traffic on Washington.

### Response to I-117-1

As identified in Section 3.14, Transportation and Traffic, construction of the Project would result in less than significant transportation impacts with implementation of mitigation measure MM TRA-1, which, as discussed in Section 3.14.7.2 of the Recirculated Draft EIR and revised in the Final EIR, would require the preparation of a Traffic Management Plan that specifies measures to minimize disruption during construction, such as establishing detour routes and coordinating with local business owners and local jurisdictions. As discussed in Section 3.14.6.2 of the Recirculated Draft EIR, Alternative 1 would result in approximately 10,000 daily reduced VMT compared to the No Project Alternative. Additionally, as identified in PM TRA-1 (Section 3.14.7.1 of the Recirculated Draft EIR), components of the Project shall include new or modifications to existing traffic signals to accommodate light rail movements and traffic circulation patterns at intersections, enhancements to existing signalized crosswalks, and bicycle circulation and access amenities in immediate station areas. As such, operation of the Project is not expected to lead to a substantial or measurable increase in vehicle travel.

### Comment I-117-2

Please listen to the community, Metro, before making our neighborhoods suffer more traffic and construction and crime.

### Response to I-117-2

Concern about traffic and community impacts is noted. The commenter is referred to Section 3.12, Population and Housing, Section 3.13, Public Services and Recreation, and Section 3.14, Transportation and Traffic, of the Recirculated Draft EIR for a detailed discussion of impacts related to these resources from operation and construction of the Project. A brief summary of impacts related to these resource topics is provided below:

- Population and Housing: As identified in Section 3.12, operation and construction of the Project would result in less than significant impacts on population and housing and no mitigation is required.
- Public Services and Recreation: As identified in Section 3.13, operation and construction of the Project would result in less than significant impacts on public services and no mitigation is required.

- Transportation and Traffic: As identified in Section 3.14, operation and construction of the Project would result in less than significant transportation impacts, with implementation of mitigation.

Regarding concerns related to crime, the commenter is referred to Response to Comment I-7-3.

## I-118: J L

### Comment I-118-1

Shame on Metro for pushing this $5 billion subway for only 4,122 new riders. Metro staff clearly does not understand transportation if all you could come up with is something Metro cannot afford by billions of dollars, and will take over a decade to build.

### Response to I-118-1

The commenter's opposition to the Project is noted. Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1. Regarding Metro expertise in transit, see Response to Comment I-53-1.

## I-119: Daniel T

### Comment I-119-1

We never asked for this project and it will cost too much for almost no benefit. Metro needs to learn how subway trains work and why you build subways where you will have the most use, not for an outlet mall by a freeway for $6 billion. Metro is doing the dirty bidding of Dutra and Solis, who are demanding this awful project at any cost.

### Response to I-119-1

The commenter's opposition to the Project is noted. Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding the commenter's characterization of the Project as a subway to an outlet mall, see Response to Comment I-50-1.

## I-120: Jason Miller

### Comment I-120-1

This project makes no sense and is a waste of $6 billion that could otherwise go to improving transit today with better bus service. There is some serious corruption going on between Metro, Dutra, and the Citadel, and the public should know all the facts before we spend billions on a subway to an outlet mall when so many other places need better transit first, like Whittier Blvd.

### Response to I-120-1

The commenter's opposition to the Project is noted. Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding

environmental impacts, see Response to Comment I-4-3. Regarding the commenter's characterization of the Project as a subway to an outlet mall, see Response to Comment I-50-1.

## I-121: Anonymous

### Comment I-121-1

Congratulations to Metro and Dutra! You've managed to design the most expensive transit project in the world, breaking a world record for billions$ spent per new station and rider, for the lowest possible ridership and use. A special thank you to Dutra for making sure the $5 billion subway for the first phase will use up all the funds available for the project and require billions more to get to Whittier, ensuring it never reaches the city limit of Whittier in anyone's lifetime. And that when it does get to Whittier, it will be miles away from Uptown and Whittier College, and yet still take 45 minutes to reach downtown LA once you've gotten to the station and onto the train. It's hard to spend $5-7 billion for such little gain, bravo.

### Response to I-121-1

The commenter's opposition to the Project is noted. Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1. Please note that per Section 3.14.6.1.1 of the Recirculated Draft EIR, travel time between the Atlantic station (relocated/reconfigured) and the Lambert station for Alternative 1 would be approximately 22.6 minutes, which would be approximately 9 minutes faster than the projected auto travel time (32 minutes) between these two points.

## I-122: Anonymous

### Comment I-122-1

Metro needs to disclose to the public how and why the Citadel outlet mall managed to transform a project over 10 years in planning, in order to serve their mall with a $5 billion subway that does not solve a critical transportation need or problem. How did the Citadel all of a sudden become a priority to serve with subway trains? Metro must disclose to the public all of the influences the Citadel is exerting on Metro staff and board members Dutra and Solis. There is no reason the Citadel should have a subway station before lower income residential communities of color. Metro staff will eventually be exposed for their blind allegiance to the citadel, and for writing an environmental document heavily swayed by and influenced by a corporation for their own benefit, at the expense of transit riders. If Metro does not want to reveal these publicly, we will file lawsuits to ensure everything behind this $5 billion subway for 4,000 riders is exposed for the awful project it is, driven by political corruption and not by a real transportation need.

### Response to I-122-1

The commenter's opposition to the Project is noted. The Recirculated Draft EIR was prepared to comply with CEQA and is a public disclosure document that objectively evaluates the environmental impacts of the Project to inform government decision-makers and the public of the environmental effects of a proposed activity and to avoid or reduce significant impacts of the activity when feasible to do so. Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response

to Comment I-13-1. Regarding the commenter's characterization of the Project as a subway to an outlet mall, see Response to Comment I-50-1.

## I-123: Joe

### Comment I-123-1

This project has become a complete joke and the people working on it have proven to be incredibly inept at their job. Metro staff doesn't appear to know the basics of public transportation, and what the difference between a bus and a high capacity train is. And why you build trains where demand and use will be highest, not lowest. If Metro staff can't even understand the basic of public transit, how can we trust them to plan and design multi billion mega projects across LA County? Only an inept transportation professional would propose a $5 billion subway train that will serve 4,000 new station boardings. And only corrupt leadership would approve such a waste of public funds for such little gain when they know there are numerous other Metro projects that will have much higher demand and use, for a much lower cost.

### Response to I-123-1

The commenter's opposition to the Project is noted. Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1. Regarding Metro expertise in transit, see Response to Comment I-53-1.

## I-124: J Rodriguez

### Comment I-124-1

We do not want this project, it will bring homeless and crime to our neighborhoods and add traffic.

### Response to I-124-1

The commenter's opposition to the Project is noted. See Response to Comment A-8-19 which address security concerns, in terms of crime and homelessness.

## I-125: Eugenia Reyes

### Comment I-125-1

My name is Eugenia Reyes. I do live on the south side of Maple. I do agree with everybody here. I'm happy that somebody from East L.A. that was in Metro, in front of the Metro, you're here, because, to be honest, I used to go to the Santuario de Guadalupe, the church right there. And you know what? After that, you don't see no more cars. Nobody wants to be nearby, barely, Third Street, et cetera. It's going to impact all those semi-trucks. And they have to back up, unload. I don't want it. I already had enough, and I have to deal with this since I was born, because my parents have lived in that house since 1977. So I am already used to the noise of the trucks.

### Response to I-125-1

The commenter's opposition to the Project is noted. Regarding congestion, see Response to Comment I-21-1. Regarding truck movements, see Response to Comment A-8-20. The commenter is referred to Section 3.11, Noise and Vibration, of the Recirculated Draft EIR for a detailed discussion of impacts related to these resources from operation and construction of the Project. As identified therein, operation and construction of the Project would result in less than significant impacts from noise and vibration, with implementation of mitigation.

### Comment I-125-2

I don't want no more. I don't want it to go under. I don't want it to go on top. We've already had enough with so much stuff going on, destroying our mother nature. And to top it off, when is it going to get fixed? You already saw what happened to the bridge on Sixth Street. People are going to be on the Metro and start destroying it (speaking in Spanish.) It's all trash. People are going to, little by little, start graffiti. No, thank you. I don't want people from outside coming over here, and I don't want any people from here -- because I'm not saying that all the angels are here in Montebello. There are some bad ones, too. I don't want them to cause problems in other sides of the city. If you guys want a Metro, do it downtown. If you want that to look like New York, go for it. But not Commerce, not Montebello, not anything in this area. I'm sorry.

### Response to I-125-2

The commenter's opposition to the Project is noted. See Response to Comment I-7-3 regarding crime. The Project's selection of materials will comply with the MRDC, which requires the use of landscaping on soundwalls and retaining walls, as appropriate, for graffiti management.

## I-126: Jesse Garcia

### Comment I-126-1

Thank you. My name's Jesse Garcia. I live at 90640 zip code. So presently you have a $3 billion project. It is 9.4 miles, more or less, so I run to the office of 10 miles. That's about $300 million per mile that will be spent. Now, the cost of ridership is $1.75. Max occupancy is at 405 passengers, which will never happen. So I rounded this to 250. That's 125 passengers per train. That's roughly about $1,304.50 every hour. It says it's going to run for 24/7. It's not going to happen, so I rounded that to ten hours. That's roughly $13,125 per day. In a 30-day time frame, that's $393,750. In one year, that's 4,000,750. In order to pay back the principal of $3 billion, that's 52 years; okay? And, again, this is at the 10,000-foot level. I didn't put in any other variables. With something of the scope of this size, the nature and scope, it's a lot. So basically, if I were to present this to my manager, he would throw me out of his office. And I am a product manager, a program manager in my 14· ·past life. So in order for this to be paid off in five years -- every company wants their principal to be paid back in five years, ridership would have to increase to $14 per head. Now, the reason we can do this, it's public money. It is all public money.

### Response to I-126-1

Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1. Regarding the range of alternatives to the Project that have been considered, see Response to Comment CO-4-15.

## I-127: Edmund Veloz

### Comment I-127-1

Okay. I'm going to read something to you. My name is Edmond Veloz.·I live in 90640, Montebello.· I'm going to read something to you directly. These are Jenny Cristales-Cevallos's own words from the Whittier meeting last -- in 2019. It says here "So all these elements need to go through the public review process and the elemental process down to when we identify the locally preferred alternative. So this is currently the purpose and need of the project." Again, we are soliciting input to ensure this purpose meets the meets the community's needs and concerns."

### Response to I-127-1

The commenter may be referring to the public scoping period where input was solicited from agencies and interested members of the public to assist in determining the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in the Recirculated Draft EIR. Comments received during the scoping period were considered in preparation of the Recirculated Draft EIR pursuant to CEQA requirements. Also pursuant to CEQA requirements, a public comment period for the Recirculated Draft EIR was held from June 30 through August 29. Comments received on the Recirculated Draft EIR will be provided to the decision-makers for their review and consideration prior to taking any action on the Project. Additionally, see Chapter 6, Public Outreach, of the Recirculated Draft EIR regarding the public outreach and opportunities/methods for the public to provide input on the Project.

### Comment I-127-2

We are local here. These are the locally preferred alternatives. TSM, electric buses. That's what we want. There's 1,235 -- 1,250 names here, and we have over 1,600 now. This is the locally preferred alternative. This is what we want, not what they want. This is all they want.

### Response to I-127-2

See Response to Comment I-62-1 regarding the TSM Alternative. See Response to Comment CO-4-15, regarding the range of alternatives to the Project that have been considered.

### Comment I-127-3

We've never been involved in the project, whether you know it or not. The Montebello city council has this, and so does the Metro have this, yet they don't want to acknowledge any of this. Folks, you're being -- you're being -- you're being robbed today, and they're filling you with 20 years full of cow manure today to tell you, oh, you matter. You don't matter. Not one bit. Thank you.

### Response to I-127-3

See Chapter 6, Public Outreach, of the Recirculated Draft EIR regarding the public outreach and opportunities for the public to provide input on the Project.

## I-128: Esther Celiz

### Comment I-128-1

Hello. My name is Esther Solis. I live in Pico Rivera. I am very glad to be here for this presentation. But they haven't even mentioned Pico Rivera. We are over 65,000 residents. On the map top side,

you see the stations. You see all the way coming down from East L.A. and Commerce. They go all the way over to Washington and Whittier by the PIH hospital. They don't show you the part of Pico Rivera. Pico Rivera starts on Rosemead, which is very important with all our commercial industries there. We have all our shopping centers. They would be affected. They were affected all through COVID and lost so much money.

### Response to I-128-1

It is not clear what map the commenter is referencing. Figures in the Recirculated Draft EIR that show the Project alignment include the boundaries of all cities and unincorporated communities in the study area by color and label. For example, Figure 2.1. on page 2-4 of the Recirculated Draft EIR shows the entire city of Pico Rivera in a salmon color with a label of the city name. The proposed station at Rosemead Boulevard, also depicted on this map, is in the city of Pico Rivera. Regarding concern for local businesses, see Response to Comment B-2-9.

### Comment I-128-2

Now they're going to be affected by having all the construction on that street. They're not going to allow the trucks to come through. We have many trucks, Commerce, going through. Where are those trucks going to go? They're going to go on Slauson, which is going to impact Slauson.

### Response to I-128-2

As explained in Section 3.14.6.1 of the Recirculated Draft EIR, consistent with local plans, truck routes that may be used for transporting and hauling construction-related materials include Atlantic Boulevard, Saybrook Avenue, Telegraph Road, Washington Boulevard, Paramount Boulevard, Rosemead Boulevard, Slauson Avenue, and Whittier Boulevard. Restrictions on haul routes can be incorporated into the construction specifications according to local permitting requirements as identified in PM TRA-2 (discussed in Section 3.14.7.1 of the Recirculated Draft EIR and revised in the Final EIR, per Response to Comment A-5-1). Table 3.14.-3 in Section 3.14.8 of the Recirculated Draft EIR summarizes the mitigation measures and impact determinations. Regarding traffic movement during construction, implementation of MM TRA-1, as discussed in Section 3.14.7.2 of the Recirculated Draft EIR and revised in the Final EIR, would require the preparation of a Traffic Management Plan that specifies measures to minimize disruption during construction, such as establishing detour routes and coordinating with local business owners.

### Comment I-128-3

We have Passons and Washington over there by Rancho High School and Rivera Middle School that has over 45,000 children crossing both ways. The safety of our children is in jeopardy. They're telling me they: Oh, they can stop quickly. They cannot stop quickly. When you stand there and look at them, you've got 100 to 200 kids crossing both ways. It's a safety issue.

### Response to I-128-3

The commenter asserts that there are 45,000 children crossing at Washington Boulevard and Passons Boulevard, near Rancho High School and Rivera Middle School. However, this estimate appears to be overstated. The two schools are both located approximately 0.25 mile from the intersection (El Rancho High School to the north and Rivera Middle School to the south) and the combined number of students who attend these schools is approximately 3,000. While some students would cross at this intersection, others would use other routes that do not require crossing Washington Boulevard (e.g., students that live on the same side of Washington Boulevard as the schools they attend) or that would use modes of transportation such as school

buses or personal vehicles that do not involve pedestrian or bicycle crossing. Therefore, the number of children crossing the intersection is expected to be much lower than asserted by the commenter.

The Washington Boulevard and Passons Boulevard intersection would be fully signalized with pedestrian crossings. As with all grade crossings along Washington Boulevard, the crossing at Passons Boulevard would be designed in accordance with Metro Rail Design Criteria (MRDC) to ensure safety and minimize potential hazards, as set forth in project measure PM TRA-1 (see Section 3.14.7, Transportation and Traffic, in the Recirculated Draft EIR.) See Response to Comment I-55-2 for additional information about this intersection and safety measures that would be implemented.

### Comment I-128-4

And we have homes, homes from Rosemead all the way down to the 65 Freeway. The homes are there. How are you going to affect them with the staging sections? Where are they going to be? How is our community going to be taken care of? It's 65,000 residents and we had to fight for the in-house meeting in the city council.

### Response to I-128-4

Construction staging areas are described in Section 2.6.2 Construction Staging Areas of the Recirculated Draft EIR and Appendix P (Construction) of the Recirculated Draft EIR and shown on Drawings R-W-101 through R-W-118 in Volume 2, Advanced Conceptual Design, of the Recirculated Draft EIR. Construction areas would be located at existing commercial and industrial sites. No residential properties would be displaced for construction or operation of the Project.

See also Section 3.12, Population and Housing, and Section 3.13, Public Services and Recreation, of the Recirculated Draft EIR for a detailed discussion of impacts related to these resources from operation and construction of the Project. A brief summary of impacts related to these resource topics is provided below:

- Population and Housing: As identified in Section 3.12, operation and construction of the Project would result in less than significant impacts on population and housing and no mitigation is required.
- Public Services and Recreation: As identified in Section 3.13, operation and construction of the Project would result in less than significant impacts on public services and no mitigation is required.

For more information on public outreach efforts during the Recirculated Draft EIR public review period, see Response to Comments I-162-5 and I-161-3.

## I-129: Jorge Martinez

### Comment I-129-1

I have a for-instance. Say I live in Montebello south of the Washington Boulevard, and it's already constructed. I'm diabetic. I'm a cardiac patient. And I know for a fact that there's going to be hampered emergency vehicle response times. So if I die on the way to the hospital or the ambulance or the paramedics don't reach me in time because the only north-and-south route is

going to be Greenwood, I'm dead. My family is going to sue the Metro. And you multiply this by thousands or hundreds of people that are diabetic and cardiac people. Well, you've got your answer there. Mitigate that. Thank you.

### Response to I-129-1

See Response to Comment I-36-1 regarding emergency services. As described therein and in Section 3.13, Public Services and Recreation, of the Recirculated Draft EIR, fire and police protection response times are anticipated to remain at acceptable levels. Impacts on emergency services would be less than significant and no mitigation is required.

### Comment I-129-2

And say no to the -- say no to the Gold Line.

### Response to I-129-2

The commenter's opposition to the project is noted.

## I-130: Marina Martinez

### Comment I-130-1

Hi. My name is Marina Martinez, and I live in Pico Rivera. The zip code is 90660. And let me just point out that at the Zoom meeting on June 27th, I had to bring up the fact that Pico Rivera was not receiving a copy of the Environmental Impact Report, which -- thanks -- afterwards, they did have it available, and also to the City of Commerce. And as far as the public meetings, originally scheduled, it was only three, and now they included Pico Rivera as well, and I think that's a good thing, but we shouldn't have to have -- we shouldn't have been an afterthought. But besides that point, if you looked at the data analysis for the ridership of the Gold Line back in 2019, it was very low. It was the lowest of all the light-rail systems.

### Response to I-130-1

See Chapter 6, Public Outreach, of the Recirculated Draft EIR regarding availability of the document for public review. Regarding public hearing locations, originally, three in-person and one virtual meeting were scheduled. In response to concerns voiced by Pico Rivera residents, an in-person component located at Pico Rivera City Hall was added to the virtual hearing on August 11, 2022.

Regarding ridership, see Response to Comment I-13-1.

### Comment I-130-2

It is not making money for Metro. It is considered -- many people cite safety reasons, and the fact that it is not -- takes them to where they want to go. So as far as the Washington Boulevard alternative, it's going to Washington and Lambert, but where will people get off if they want to go to work? I mean, I don't work at the hospital. I don't work there at -- why would I take the Gold Line? So, to me, it's a train that goes nowhere. For $3 billion, it goes nowhere.

### Response to I-130-2

See Response to Comment I-7-3 regarding safety. See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need.

## I-131: Mike Martinez

### Comment I-131-1

Hi. Good morning, everybody. My name is Mike Martinez, East L.A. resident. I live literally in front of the Gold Line on Third Street. I see the impact it has for our community, and we hate it. It was – nobody liked it, even after the fact. It was just a bad idea overall for above-ground train. One thing I'd like to mention, the report, page 3.4-34, over on Washington Boulevard over Rio Hondo, they're going to change your – three lanes on each side to two lanes, and that's going to be across the board. It's going to create congestion. I've seen it in front of my house.

### Response to I-131-1

The commenter's assertion that the project would convert three lanes to two travel lanes over the Rio Hondo Bridge is incorrect. As explained in Section 3.14.6.1, construction would require a temporary reduction in the number of travel lanes on the two bridges. The bridge reconstruction would occur in two phases (one for each side of the bridge) and the roadways would be partially closed for an extended period of time during construction. Implementation of MM TRA-1, as discussed in Section 3.14.7.2 of the Recirculated Draft EIR and revised in the Final EIR, would require the preparation of a Traffic Management Plan that specifies measures to minimize disruption during construction, such as establishing detour routes and coordinating with local business owners. Additionally, as explained in Section 3.9.6.1 of the Recirculated Draft EIR, the replacement bridges would be wider than the existing bridges to accommodate the light rail guideway.

### Comment I-131-2

They're going to work during the nighttime hours, so just imagine all the loud noise. And that's Section 3.8-60 of the Environmental Report. They're also saying in Section 3.4-14 that all the congestion from the trucks on Washington -- that they're going to be going on Telegraph Road, Olympic Boulevard, and Whittier Boulevard. Section 3.4-29 of the report, they're thinking -- there's approximately -- they need to take off 10,000 cars off the street because of this.

### Response to I-131-2

The commenter incorrectly asserts that Section 3.4-14 of the Recirculated Draft EIR states trucks on Washington would travel on Telegraph Road, Olympic Boulevard, and Whittier Boulevard. Section 3.14.6.1 of the Recirculated Draft EIR explains that parallel east–west routes (e.g., Telegraph Road, Olympic Boulevard, Whittier Boulevard) would continue to serve as alternatives to Washington Boulevard, providing additional connections to and from the regional freeway network. Regarding congestion, CEQA and the CEQA Guidelines no longer require a level of service analysis to determine significant impacts; see Response to Comment A-8-14 regarding this change.

### Comment I-131-3

And let me tell you this much. I live in front of the rail. I count how many passengers ride that Gold Line. Per cabin, a maximum occupancy of 75 people. There's only six people riding it on average, and that's very generous. That's only 3.5 percent of occupancy. That's $4 billion for 3.5 percent. Think about that.

### Response to I-131-3

As stated in Section 3.14.6.3.1 of the Recirculated Draft EIR, Table 3.14-1 shows that the average daily ridership on what was formerly the Metro L (Gold) Line is 52,183 passengers.

## I-132: Sandra Sandoval

### Comment I-132-1

Hi. My name is Sandra. My zip code is 90022. I'm from -- MS. ARELLANO: Excuse me. Can you repeat your last name? MS. SANDOVAL: Sandra Sandoval. East L.A. My comment is that -- well, I have a question. You mentioned the rail yard. Could you please tell me where that rail yard is? Is it the old train station? You probably can't answer my question, but I would hate to have those old historic trains torn down. So if you're going to build a yard at the old train station, I'd like to know where it's at. Is it in the City of Commerce, and which rail station is it? Because I don't think you need to be tearing down our old historic buildings.

### Response to I-132-1

The commenter may be referring to the former Union Pacific Railroad Station located near 5480 Ferguson Drive. The Commerce MSF site option is located over one mile to the east of this building and it would not be impacted. See Section 2, Project Description, which provides maps and description of the Project components, including the Commerce MSF.

### Comment I-132-2

And my only comment is you need to build subways. I'm just against light rail. The red cars, yellow cars, they've been gone for more than 50 years. You know, we've adjusted to cars. They've built freeways, so everybody's used to the cars. People are not going to stop buying cars. So you if you want to build rail, you need to be underground. So I am for subway. If we need to wait 50 years -- because we already did – wait another 100 years, then go ahead. We may never see another subway all the way to Orange County, but we need subways. So I am all for the subways. Please do not be creating more traffic, because I rode the Eastside Gold Line every day for work and it was empty.

### Response to I-132-2

The commenter's support for an underground alignment is noted. See Response to Comment A-10-5 regarding grade separation and Response to Comment I-41-1 regarding traffic congestion.

### Comment I-132-3

I rode the Eastside Gold Line every day for work and it was empty. I was the only person -- maybe two people on the entire train going to Pasadena alone at 6:00 o'clock in the morning. No one else was on the train other than me and one other person on the Pasadena Gold Line. Thank you.

### Response to I-132-3

See Response to Comment I-13-1 regarding ridership.

## I-133: Rob Lopez

### Comment I-133-1

Please stop this plan to destroy Washington blvd and cause more traffic and crime.

### Response to I-133-1

The commenter's opposition to the Project is noted. See Response to Comment I-21-1 regarding traffic impacts and Response to Comment I-7-3 regarding crime.

## I-134: Gloria Zelaya

### Comment I-134-1

Why South Montebello.

Beverly is a better option, it goes to Whittier, and follows same route as Washington Blvd.

Washington blvd is a busy street. Underground rather than aerial or ground level

South Montebello is going to be exposed to more traffic, noise, pollution.

### Response to I-134-1

The commenter is referred to Table 1-1 of Appendix T, Alternatives Withdrawn from Further Evaluation, of the Draft Recirculated EIR. Table 1-1 Concepts and Alternatives Withdrawn identifies key reasons why alternatives along Beverly Boulevard and Whittier Boulevard were eliminated. The basis for elimination of alternatives at Beverly Boulevard and Whittier Boulevard was analyzed in the 2009 Alternatives Analysis which is included as Attachment A of Appendix T of the Draft Recirculated EIR. See Response to Comment A-10-5 regarding grade separation and Response to Comment I-21-1 regarding traffic impacts. Section 3.2, Air Quality, of the Recirculated Draft EIR provides analysis regarding potential air quality impacts and Section 3.11, Noise and Vibration, of the Recirculated Draft EIR provides analysis regarding potential noise impacts. As described therein, air quality impacts would be less than significant, and noise impacts would be less than significant with implementation of mitigation.

### Comment I-134-2

South Montebello is going to be exposed to more traffic, noise, pollution. South Montebello already has a train going through, this will is added stress on already hectic living conditions.

### Response to I-134-2

The commenter's opposition to the Project noted. See Response to Comment I-134-1 above regarding traffic, noise, and pollution.

## I-135: Metro is Corrupt

### Comment I-135-1

Metro is ignoring the more critical needs of bus riders so that Dutra can get a subway train to the citadel mall for $5 billion. Metro has dozens of bus lines that serve more people today than this train to Whittier will ever serve in the future, and Metro professionals are abdicating all professional duties and responsibility to the public as stewards of scarce financial public resources, all to support a subway that will serve 4,122 new station boardings.

### Response to I-135-1

Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1. Regarding the commenter's characterization of the Project as a subway to the Citadel Outlets, see Response to Comment I-50-1.

### Comment I-135-2

Shame on anyone at Metro that is blindly pushing this forward without properly vetting superior alternatives that would serve more transit riders sooner than a $5 billion subway that is billions short of funding before it can even reach the Citadel.

### Response to I-135-2

See Response to Comment CO-4-15 regarding alternatives that have been considered. Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1.

## I-136: Anonymous

### Comment I-136-1

Does Metro's Project Manager Jenny Cristales ever ride the system she works for? Do her managers ever bother to ride? If they did, they would quickly learn why and where subway trains are needed to serve lots of riders, where demand is high enough to warrant an underground train.

### Response to I-136-1

See Response to Comment I-10-5 regarding the project need.

### Comment I-136-2

They could ride any bus on Vermont Avenue south of Wilshire to see why the corridor needs an underground train to serve the tremendous demand and density. Then they could ride the existing Gold Line out to Atlantic and see how little the 3rd street stations are used and how slow the train is. If they don't want to ride the system they work for, they also have access to Metro's own ridership data that shows the 3rd street stations are the lowest ridership rail stations Metro has ever built (until now). They can educate themselves from their own computer, on why a subway train that costs $6 billion for just a few thousand new boardings is an egregious misuse of public funds. And how less than half that amount could go towards transit improvements that would serve more people than a subway to the Citadel.

### Response to I-136-2

Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1. Regarding the commenter's characterization of the Project as a subway to the Citadel Outlets, see Response to Comment I-50-1.

## I-137: Anonymous

### Comment I-137-1

Local news outlets like the LA Times need to fully investigate this project and reveal why Metro staff, with the backing of Hilda Solis and Fernando Dutra, are insisting $5 billion in public funds be spent for only 4,000 riders and boardings.

### Response to I-137-1

See Response to Comment I-9-2 regarding the project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership.

### Comment I-137-2

Metro has a responsibility to reveal to the public what that amount of spending could otherwise achieve, and why a $5 billion subway to the Citadel Mall is the best solution to transportation problems and needs throughout the eastside communities.

### Response to I-137-2

See Response to Comment I-9-2 regarding the project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-50-1 regarding the commenter's characterization of the Project as a subway to the Citadel Outlets.

## I-138: C J

### Comment I-138-1

We strongly oppose any alternative that includes Washington Boulevard and support the No Build and No Project alternative.

### Response to I-138-1

The commenter's opposition to Alternative 1 and Alternative 3 is noted, as is the commenter's support for the No Project Alternative.

### Comment I-138-2

Metro's EIR document does not make the case for a rail line on washington, proven by Metro's own numbers and analyses.

### Response to I-138-2

Pursuant to CEQA, the Recirculated Draft EIR is a public disclosure document that objectively evaluates the environmental impacts of the Build Alternatives being considered by the Lead

Agency and the No Project Alternative. It evaluates the impacts of the alternatives and identifies the environmentally superior alternative (Section 15126.6 CEQA Guidelines), but it does not make a recommendation to decision-makers (Metro Board of Directors).

### Comment I-138-3

Metro owes it to the public and LA County taxpayers to choose the best performing alternative, not a political alternative that serves the least amount of people possible for billions in spending in order to appease a specific politician for their own political gain at the expense of transit riders.

### Response to I-138-3

Section 5.1 of the Recirculated Draft EIR evaluates a reasonable range of alternatives as described in Section 15126.6(a) of the CEQA Guidelines. See also Response to Comment CO-4-15 regarding the range of alternatives that were considered. See Response to Comment I-9-2 regarding project cost and see Response to Comment I-10-5 project need.

## I-139: Jason S

### Comment I-139-1

Before mocking the public and claiming the eastside gold line has high ridership, Project Manager Jenny Cristales should do herself a favor and actually get out and ride the line she claims to be an expert on. Riding the system would teach her how slow the gold line is on 3rd street, that the stations on 3rd are the least used in the entire Metro system, and that an east-west line doesn't benefit from a north-south subway to an outlet mall.

### Response to I-139-1

See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership. See Response to Comment I-50-1 regarding the commenter's characterization of the Project as a subway to an outlet mall.

### Comment I-139-2

Riding the system would teach her how slow the gold line is on 3rd street, that the stations on 3rd are the least used in the entire Metro system, and that an east-west line doesn't benefit from a north-south subway to an outlet mall. If Metro staff and management do not ride transit other than when forced to by their CEO, how can we trust them to plan and design the best transit projects for LA County residents that do ride transit?

### Response to I-139-2

As discussed in Recirculated Draft EIR Appendix T, Alternatives Withdrawn from Further Evaluation, the evaluation and screening of concepts, engineering and environmental refinements, and decisions to withdraw alternatives from consideration has a long history in the development of the Project. For background information on the transit options that have been considered and evaluated for the region and that have led to the evolution and selection of the Project evaluated in the Recirculated Draft EIR, see the Eastside Transit Corridor Phase 2 Alternatives Analysis (AA) Report that was published in 2009. The AA Report established the purpose and need of the project and identified and assessed transportation alternatives to be studied further in the environmental process. See also Response to Comment CO-4-15 and Response to Comment I-116-2.

## I-140: Jamie 11

### Comment I-140-1

For over 10 years, Metro studied this project without a Citadel subway or a Citadel station. All of Metro's reports over those 10 years never claimed the need for a subway to the Citadel mall. Then, when Jenny Cristales became "project manager", the project suddenly shifted away from an eastward extension, and fully embraced a new subway line to the Citadel Mall, with a subway station at the Citadel. Jenny and all Metro management staff are required to disclose any inappropriate relationship with the Citadel or any sort of agreement, formal or informal, with the Citadel that suddenly caused it to become the most important destination for a new subway train in LA County. What agreements do Metro staff have with the Citadel that caused them to do a complete reversal of all the routes they studied for this project for a decade, in order to reroute it to the Citadel?

### Response to I-140-1

See Response to Comment I-139-2, Response to Comment CO-4-15, and Response to Comment I-116-2 regarding the evaluation and screening of concepts, engineering and environmental refinements that led to the selection of the Build Alternatives evaluated in the Recirculated Draft EIR.

### Comment I-140-2

The public has the right to know before Jenny and Metro sink over $5 billion into a first phase priority subway that will only reach the Citadel in the next 20 years. Do Jenny and Metro think a subway to the Citadel is the most vital transit link Metro could provide to residents for $5 billion or more in spending? If so, they need to prove it. Prove it with the numbers, data, and facts, not the wishes or desires of Dutra, a councilmember from Whittier who insists on a Whittier train even though he knows the funds aren't there to get the train to Citadel, let alone Whittier. A man who claims he wants the train to avoid traffic on his trips to Downtown LA, ignoring the fact that the train will take him 45 minutes from Whittier to reach downtown, and that's after he's managed to get himself to the intersection of Lambert and Washington, in the far western corner of his city, near the city limit.

### Response to I-140-2

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership. See Response to Comment I-121-1 regarding travel time. See Response to Comment I-50-1 regarding the commenter's characterization of the Project as a subway to an outlet mall.

## I-141: Anonymous

### Comment I-141-1

This project is a perfect example of what happens when Metro employees who do not ride transit are allowed to plan and design transit projects for people who do ride. The Metro Managers working on this project would not be caught dead riding a bus or train in LA, but they think they have the education, knowledge, and expertise to plan multi billion dollar transit projects for people they would never associate with or ride with. Managers who use their own private cars to get

everywhere in LA, including to their own job at Metro Headquarters, one of the most transit accessible places in California.

### Response to I-141-1

See Response to Comment I-139-2, Response to Comment CO-4-15, and Response to Comment I-116-2 regarding the evaluation and screening of concepts, engineering and environmental refinements that led to the selection of the Build Alternatives evaluated in the Recirculated Draft EIR.

### Comment I-141-2

These same managers think they are doing good public work by developing the most expensive projects for the least amount of gain. Only an inept transportation planner would ever propose a $5 billion subway to an outlet mall for 4,000 new rider boardings. In any rational world, this would get laughed out of the room during the initial brainstorming phase. But Metro staff who do not ride transit think it's the ideal solution to transit needs for East LA County.

### Response to I-141-2

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership. See Response to Comment I-50-1 regarding the commenter's characterization of the Project as a subway to an outlet mall.

### Comment I-141-3

And have no idea how to come up with better alternatives that would cost less than $5 billion and could be built as soon as possible.

### Response to I-141-3

See Response to Comment I-9-2 regarding the project cost. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

## I-142: Enerina Clift

### Comment I-142-1

My name is Enerina, E-N-E-R-I-N-A Clift, C-L-I F-T. My question is: Why don't let the residents of Pico Rivera knowing about this prior? It's only the people that live by Washington Boulevard and Pico Rivera. Nobody else in the north of the city knows about this project. That is my question. Thank you for taking the time.

### Response to I-142-1

See Chapter 6, Public Outreach, of the Recirculated Draft EIR regarding the public outreach and opportunities/methods for the public to provide input on the Project. Since fall 2021, Metro held consecutive stakeholder engagement campaigns within a few months apart to ensure the corridor communities had ample opportunities to become informed, engaged and prepared for the release of the Recirculated Draft EIR. As part of these efforts, the project team conducted three rounds of community meetings (November 2021, March 2022, June 2022), a robust notification campaign and public hearings during the 60-day Draft EIR review period (June 30 to August 29, 2022),

targeted stakeholder meetings to address specific concerns (e.g., East Los Angeles business), Community Based Organizations (CBO) Roundtable meetings, event booths and pop-up information tables, and other focused outreach.

Major outreach campaigns in the City of Pico Rivera included a virtual meeting via Zoom with a remote site viewing via a Tech Van at the Pico Rivera Senior Center on November 17, 2021 and March 16, 2022. In addition, a public hearing was livestreamed from the City of Pico Rivera Council Chamber on August 11, 2022. See also Response to I-161-3.

## I-143: Anonymous

### Comment I-143-1

I want to make a few comments about this. As a resident of Montebello, I completely disagree with this project in every aspect of it. Not because of the environmental impact it's going to have on our community, but the idea as -- they just selected Washington Boulevard instead of looking at alternatives off of the 60 Freeway. That was already in place at one point in time. There was a lot of protest that was done, and then that project stopped on that side.

### Response to I-143-1

The commenter's opposition to the Project is noted. As described in Section 5.3 of the Recirculated Draft EIR, the SR 60 Alternative was dismissed from consideration in February 2020 by the Metro Board as a result of significant environmental and engineering challenges. Consequently, the Build Alternatives were evaluated in the Recirculated Draft EIR as the range of reasonable project alternatives which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen the significant effects of the project.

### Comment I-143-2

And this area -- the city council did not really take into consideration any of the residents' needs. And to put this project on Washington Boulevard, that's something that should have been done, and the city completely just disregarded the part of the city on the south side of Montebello. I haven't reviewed all the information, but I will review it and make additional comments as I review it. That's very important. I do not want to share my name at this point in time. Another thing that I just want to make, I notice that the gentleman, Mr. Avilos, he has a sheet that a lot of people have signed against this project. Is that being considered as part of the no-project part of Metro? That's what I also kind of -- I also am not sure that -- he made a comment that the city knows about it. Metro knows about it, and nobody really pays attention. Those are my concerns. I've been listening to what's going on in the city. Thank you.

### Response to I-143-2

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered. The commenter may be referring to a petition submitted as part of Comment Submission I-234. See Response to Comments I-234-1 through I-234-19.

## I-144: Lourdes Ruiz

### Comment I-144-1

My name is Lourdes Ruiz. I belong to Montebello. My address is 1201 Carol Way, Montebello. And I'm here to support the Metro's construction because it seems to me that Metro is making progress. It helps the people, the people that don't drive. That way we can get home. It helps us to do our shopping. That's the reason why I'm here. I'm here to support the construction.

### Response to I-144-1

The commenter's support for the Project is noted.

## I-145: Ava Tejada

### Comment I-145-1

My name is Ava Tejada. My profession is a medical doctor. I've been living here in Montebello, United States for a short time. I've been here for, like, three-and-a-half years. But where I live at, it's my own home. I live by Neil Armstrong, right in that area where the mall is, near to the mall. I do not use the Metro. I do not use the But that does not mean that I do not support the construction, Metro's construction. But my sister-in-law -- I agree that there is progress. It's all an issue of getting used to it, because people are used to being in their car, and that's it. We don't walk. Here in this country, we don't walk. We don't walk, and that's wrong. Why? Because other examples from other countries, like Europe, small cities, large cities -- everyone has Metro. For example, the Asian countries – for example, I've been to Korea. Everything is with Metro, big cities, and it brings progress. I don't know what else to say because I'm not really too familiar with the entire project, but I'm happy with the Metro, even though I may not use it.

### Response to I-145-1

The commenter's support for the Project is noted.

## I-146: R T

### Comment I-146-1

A lot of people live near the Metrolink Riverside line tracks. Nobody lives in Commerce. The Metrolink tracks pass right by the Citadel too.

### Response to I-146-1

The commenter is referred to Section 3.12, Population and Housing, of the Recirculated Draft EIR which identifies a population of 13,172 in Commerce (Table 3.12-1). If the comment is referring to the size population being an indicator of ridership, it should be noted that as described in Appendix T, Alternatives Withdrawn from Further Evaluation, of the Draft Recirculated EIR, the area in Commerce surrounding the Citadel showed the highest ridership catchment in the Project's ridership model. The 2009 Alternatives Analysis which serves as Attachment A of Appendix T of the Draft Recirculated EIR defines the Citadel Regional Shopping Area as an Activity Center/Destination.

Metrolink is not operated by Metro nor under Metro's jurisdiction. Improvements to Metrolink service are outside the scope of the Recirculated Draft EIR.

### Comment I-146-2

Metro should look at what they can do to improve that line and add a station where it will serve a lot more people than what is being proposed, and would probably save billions of dollars, which Metro could use to extend the line further out.

### Response to I-146-2

Metrolink is not operated by Metro nor under Metro's jurisdiction. Improvements to Metrolink service are outside the scope of the Recirculated Draft EIR. See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership.

## I-147: Mike Missel

### Comment I-147-1

As a patient at the West LA VA Hospital I would love the choice of train ride. You are building a stop on the hospital grounds and back you building the train to Whittier. I am tired of the long commute and I am for the light rail to Whittier.

### Response to I-147-1

The commenter's support for Alternative 1 is noted.

## I-148: RJ Smith

### Comment I-148-1

Instead of this very expensive subway train that Metro cannot afford to build for 10 or 20 years, Metro needs to look at immediately providing electric express and BRT bus service on all the busiest east-west streets through Montebello, Pico Rivera and Whittier, with direct faster service to places people want to go like Whittier College and Uptown Whittier.

### Response to I-148-1

See Response to Comment I-9-2 regarding the project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

### Comment I-148-2

Metro cannot expect people to have to transfer at Lambert after riding the train for 45 minutes from downtown LA to reach these important destinations and where lots of people live and where transit will work best.

### Response to I-148-2

See Response to Comment I-121-1 regarding travel time.

## I-149: Alex Barnhart

### Comment I-149-1

I whole heartedly support the alternative 1 rail expansions in this corridor. The city of Los Angeles desperately needs to prioritize alternative modes of transportation other than cars. With the ongoing expansion of metro with measures R and M overhauling high traffic routes in LA, this spur line would connect many people to parts of the city they would otherwise need cars for.

### Response to I-149-1

The commenter's support for Alternative 1 is noted.

### Comment I-149-2

Traffic death in LA is an on going crisis and this would also be a major win for public safety. Getting people out of cars and into trains will cause deaths to plummet for riders. Also LA is forever dealing with climate change and auto travel is the #1 cause of greenhouse gas emissions. This would prioritize better climate policy.

### Response to I-149-2

The commenter's support for the Project is noted.

### Comment I-149-3

Access to quality transit is also a major boost to the economy of the region as it prioritizes walkable areas which bring people into the area as seen by Culver Cities huge boom for example since the expo line started serving the area. Anything less than alternative 1 would be a disservice to East LA.

### Response to I-149-3

The commenter's support for Alternative 1 is noted.

## I-150: A Martinez

### Comment I-150-1

Please do not build this project and bring more construction traffic

### Response to I-150-1

The commenter's opposition to the Project is noted. As identified in Section 3.14, Transportation and Traffic, construction of the Project would result in less than significant transportation impacts with implementation of mitigation measure MM TRA-1, which, as discussed in Section 3.14.7.2 of the Recirculated Draft EIR and revised in the Final EIR, would require the preparation of a Traffic Management Plan that specifies measures to minimize disruption during construction, such as establishing detour routes and coordinating with local business owners and local jurisdictions.

### Comment I-150-2

and crime to our neighborhood. Stick to the Metrolink routes or upgrade your bus service on Whittier and Beverly Blvd instead.

### Response to I-150-2

Metrolink is not operated by Metro nor under Metro's jurisdiction. Improvements to Metrolink service are outside the scope of the Recirculated Draft EIR. See Response to Comment I-7-3 regarding crime. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

## I-151: Anonymous

### Comment I-151-1

Only a deeply corrupt agency with corrupt leaders would come up with and promote a $6 billion subway to an outlet mall as the best transit solution for "the Eastside" and best use of dollars for transit riders, both current and future. $6 billion to reach an outlet mall surrounded by a freeway and industrial land cut off from any surroundings neighborhoods or destinations other than Citadel.

### Response to I-151-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-50-1 regarding the commenter's characterization of the Project as a subway to an outlet mall, see Response to Comment I-50-1.

### Comment I-151-2

To only add 4,000 new transit boardings, something many intersections throughout LA County serve with buses alone today. Metro owes it to the public to explain why $6 billion in public funds must be spent to only serve 4,000 when Metro has projects that would cost less and serve over 10 to 25 times that amount.

### Response to I-151-2

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. As stated in Section 3.14.2.3 of the Recirculated Draft EIR, the Project is included in the list of projects anticipated to be initiated or completed through the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS) horizon year of 2045. The Project is also listed in the Los Angeles County Transportation Expenditure Plan (2016) developed by Metro for implementing the transportation projects funded by Measure M, a sales tax measure to fund infrastructure expansion throughout Los Angeles County.

## I-152: Gabriel Lopez

### Comment I-152-1

We do not appreciate being talked down to by project manager Jenny Cristales-Cevalos, telling us we don't know our own community or street we live on, that we don't observe the empty Gold Line trains on 3rd street.

### Response to I-152-1

The comment does not pertain to the environmental analysis in the Recirculated Draft or otherwise raise significant environmental issues.

### Comment I-152-2

The agency Jenny works for publishes the real numbers of ridership that show we were correct when we said it gets little use - Metro's own numbers prove it but Jenny wants to claim this extension will somehow solve that issue and her project will have a great benefit when it connects to something so awful built today by her agency as well. This project makes no sense whatsoever and Metro is ignoring the public and only listening to Fernando Dutra, a man who is a councilmember of just 1 city at the very end of this project and should not be dictating this project for his own whims and personal desires.

### Response to I-152-2

The commenter's opposition to the Project is noted. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership.

## I-153: Jay Miller

### Comment I-153-1

This project needs to be canceled and Metro needs to look at what they can do with buses.

### Response to I-153-1

The commenter's opposition to the Project is noted. See Response to Comment CO-4-15 regarding alternatives that have been considered, including alternative routes and modes.

### Comment I-153-2

Please listen to the community and stop letting Fernando Dutra speak for us.

### Response to I-153-2

See Chapter 6, Public Outreach, of the Recirculated Draft EIR regarding the public outreach and opportunities/methods for the public to provide input on the Project.

## I-154: Sam Lee

### Comment I-154-1

We cannot afford the metro coming here, it will cause more traffic on Washington

### Response to I-154-1

See Response to Comment I-21-1 regarding traffic.

### Comment I-154-2

and bring a lot of crime and homeless on the trains.

### Response to I-154-2

See Response to Comment A-8-19 regarding security and people experiencing homelessness and Response to Comment I-7-3 regarding crime.

## I-155: Tony Garcia

### Comment I-155-1

Metro wants to build a $6 subway to Citadel to gain 4,000 riders. Metro needs to explain why they have to spend $6 billion to gain only 4,000 riders and if they can gain more riders

### Response to I-155-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership. See Response to Comment I-50-1 regarding the activity centers served by the Project. It should be clarified that the cost cited in the comment is for Alternative 1 (the full 9.0 mile alignment) and the number of riders cited in the comment is for Alternative 2 (3.2 mile IOS).

### Comment I-155-2

with alternatives like buses and BRT that would cost billions less and benefit transit in LA County more.

### Response to I-155-2

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered, including busses and BRT. See Response to Comment I-10-5 regarding project need.

### Comment I-155-3

Otherwise, Metro needs to disclose all relationships with Citadel and documentation showing how and why this outlet mall was selected as the best place to build a $6 billion subway, including private deals made with Citadel ownership to secure their approval and backing. Only an agency corrupt to the core would advocate spending $6 billion on a subway to serve 4,000 riders in a place where hundreds of thousands of people are crowded onto slow over-capacity buses every day.

### Response to I-155-3

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership. It should be clarified that the cost cited in the comment is for Alternative 1 (the full 9.0 mile alignment) and the number of riders cited in the comment is for Alternative 2 (3.2 mile IOS). Regarding the commenter's characterization of the Project as a subway to the Citadel Outlets, see Response to Comment I-50-1.

## I-156: Ray Garcia

### Comment I-156-1

Keep this train and Metro's homeless and crime problem away from Washington and Whittier. Our city cannot handle all the homeless criminals dumped out into our streets when Metro sweeps the trains at the end of the line.

### Response to I-156-1

The commenter's opposition to the Project is noted. See Response to Comment A-8-19 regarding security and people experiencing homelessness.

## I-157: CJ Ramirez

### Comment I-157-1

Why does Commerce get a subway but Montebello, Pico Rivera, Santa Fe Springs, Los Nietos and Whittier have to have a train on the street level messing with traffic?

### Response to I-157-1

See Response to Comment A-10-5 regarding grade separation and see Response to Comment I-21-1 regarding traffic.

### Comment I-157-2

This is not fair and Metro should not build this project until they have the money to do it right. If it has to be built, it has to be underground the whole way.

### Response to I-157-2

The commenter's support for an underground alignment is noted. See Response to Comment A-10-5 regarding grade separation.

## I-158: Ray Garcia

### Comment I-158-1

Please choose the No Project or No Build alternative.

### Response to I-158-1

The commenter's support for the No Project Alternative is noted.

### Comment I-158-2

We do not want trains on Washington

### Response to I-158-2

The commenter's opposition to Alternatives 1 and 3 is noted.

## I-159: Irene Carrillo

### Comment I-159-1

I am against it; I live off of Washington Blvd. and Broadway and traffic is bad on Broadway. And I feel it's going to get worst. My house was hit twelve years ago because of speeding - they drive on Broadway like it is the 605 freeway. I have lived here for thirty-eight years. And traffic has tripled and going to get worst. So I am against this & traffic is bad.

### Response to I-159-1

The commenter's opposition to the Project is noted. See Response to Comment I-21-1 regarding traffic.

## I-160: N/A

### Comment I-160-1

I do not care for the Metro Track Run on street level for the Pico Rivera area. Why not use the train track that area already has the overpassed. Rethink would work best. Pico Rivera just build the new train tracks to over passed to help clear traffic and waiting time that traffic was watting to get across Town.

### Response to I-160-1

The commenter's opposition to Alternative 1 is noted. The commenter may be referring to the train bridge at Durfee Avenue. The train bridge is along the Union Pacific railroad tracks that is used by heavy rail freight trains. As stated in Section 2.5 of the Recirculated Draft EIR, the Project will operate as an underground extension of the existing Metro light rail system (not heavy rail). The light rail is not compatible with the heavy rail tracks, and further, the heavy tracks are not operated by Metro or under Metro's jurisdiction.

### Comment I-160-2

Pico Rivera has many vehicles and traffic from many places that travel through the town. this will be a hardship for our town and communitie. Metro track need to be alevate not run street leveal, that traffic need not to stop and wait for train to pass. Rethink!!! - Please Stop -

### Response to I-160-2

The commenter's opposition to the Project is noted. See Response to Comment I-4-3 regarding environmental impacts and Response to Comment A-10-5 regarding grade separation.

### Comment I-160-3

Maybe elevate the tracks up with overhead post, Not street level. Rosemead/Washington Do not build these tracks. No Metro!!! Environmental Impact - Hurt Emergency response, police respons, danger students walking to and from school crossing

### Response to I-160-3

See Response to Comment A-10-5 regarding grade separation, Response to Comment I-36-1 regarding emergency services, and Response to Comment I-36-3 regarding pedestrian safety.

### Comment I-160-4

danger traffic, danger Pedestrians crossing, No parking outsiders, safety on trains, Depot's safety

### Response to I-160-4

See Response to Comment I-36-3 regarding pedestrian and vehicle safety and Response to Comment I-7-3 regarding crime.

### Comment I-160-5

more homeless... this will dirty our town. What these plans will do is bring trash to inte our town.

### Response to I-160-5

See Response to Comment A-8-19 regarding security and people experiencing homelessness.

## I-161: Clara Solis

### Comment I-161-1

Dear Metro Staff,

Please see the attached letter outlining the reasons why I am requesting that the EIR/EIS be withdraw or alternatively that the comment period be extended.

Thank You,

Clara Solis (323)422-6446

### Response to I-161-1

Thank you for your comments. See responses to Comments I-161-2 through I-161-14 below.

### Comment I-161-2

REQUEST THAT RECIRCULATED DRAFT EIR/EIS BE WITHDRAWN OR ALTERNATIVELY THAT THE COMMENT PERIOD BE EXTENDED

I request that the Recirculated Draft EIR/EIS for the Gold Line Eastside Transit Corridor Phase 2 (DEIR) be withdrawn and recirculated with corrections. Alternatively, I join in the request by the East Los Angeles Chamber of Commerce that the comment period should be extended.

### Response to I-161-2

See Responses to Comments I-161-3 through I-161-4 which address the suggested corrections/comments identified by the commenter. No corrections to the Recirculated Draft EIR are required that would result in the need for recirculation pursuant to Section 15088.5 of the CEQA Guidelines.

Regarding the request for an extension of the public comment period for the Recirculated Draft EIR, see Response to Comment CO-5-1 and the responses to Comment I-161-3 through I-161-6 below.

## Comment I-161-3

The reasons for this request are that:

g) 1) Community outreach has been ineffective and has not notified communities impacted how this project may impact them. The notices sent to area residents are so devoid of this information that residents will largely ignore them. The notices in some instances arrived after or the day of the hearing. In one instance a resident found the notice thrown in her front yard. (Testimony at 1st East Los Angeles hearing)

## Response to I-161-3

Noticing and public outreach to inform the public of the availability of the Recirculated Draft EIR has been extensive and has exceeded minimum CEQA requirements set forth in CEQA Guidelines Section 15087. Section 15087 requires that notice be giving to those who have requested a notice in writing and one of the following: (1) Publication at least once in a newspaper of general circulation in the area affected by the proposed project; (2) Posting of notice by in the area where the project is to be located; (3) Direct mailing to the property contiguous to the parcel or parcels on which the project is located. As described in detail below, in compliance with CEQA, notices were published in several newspapers and delivered to contiguous properties. Additionally, banners were posted in several locations at and near the alignment and other forms of public outreach were performed.

To inform agencies, stakeholders, and the community about this Project, a notice of availability was distributed to agencies, organizations, elected officials, and other interested parties. A newspaper notice was published in the Los Angeles Times, La Opinion (Spanish), Whittier Daily News, and Eastside Sun. The notice of availability and newspaper notice identified the environmental topics studies in the Recirculated Draft EIR and those that were determined to have significant and unavoidable impacts. Additionally, a public mailer was distributed that included information on the release of the Recirculated Draft EIR and how to access the document and comment, as well as details on the community information sessions and public hearings, and details on the new virtual interactive tool. The mailer was sent to:

- Property owners and tenants within:
  - 500-foot buffer along the corridor
  - ½ mile buffer around the proposed stations
- 500-foot buffer around each MSF site
- Database contacts that do not have an email nor mailing addresses

A second mailing consisting of a post-card was distributed as a reminder to 31,000 addresses within a ¼ mile buffer of the alignment and to contacts that have not provided an email address. Two rounds of approximately 46,000 notices each were also hand-delivered within the buffer area (mid-June 2022 and mid-July 2022). Eleven eblasts were distributed from June 16 through August 29, 2022.

Banners advertising the availability of the Recirculated Draft EIR for review were displayed from July 15 through August 29, 2022 at Arizona Street and Whittier Boulevard, at the Sheriff Station and Belvedere Park Lake facing South 3rd Street, and along the alignment at Atlantic Avenue Park.

Additional outreach/notification included Facebook events to advertise the public hearings, text messages distributed to stakeholders who opted to received mobile text messages, distribution of flyers and lawn signs for display to local cities, public institutions, and organizations, a toolkit to stakeholders for spreading the information to the community, slides provided to cities for posting on their cable channel, and posting on Metro's website and news blog. Additionally, several media agencies, organizations and cities published their own related announcements or articles including the cities of Montebello, Pico Rivera, and Whittier, and the Los Angeles Unified School District and Los Nietos School District. See also Chapter 6, Public Outreach, of the Recirculated Draft EIR regarding the public outreach that has been conducted for the Project leading up to the Recirculated Draft EIR.

## Comment I-161-4

2) The DEIR was released at a time when residents are unable to participate fully.

a. The DEIR was released during a period of high transmission of Covid 19. Community residents living near freeways have been shown to have worse outcomes from Covid19. See Near-roadway air pollution associated with COVID-19 severity and mortality – Multiethnic cohort study in Southern California https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8416551/. From LA County Public Health website below are the numbers for East Los Angeles and some nearby communities The death rate for East Los Angeles is one of the highest for a large community - roughly one in 228 residents in East Los Angeles lost their life to Covid 19. *[See the table in the original Comment Submission I-161 located in Appendix A of the Final EIR]*

Note Boyle Heights is also located near multiple freeways.

## Response to I-161-4

The commenter's suggestion that the timing of the release of the Recirculated Draft EIR prevented full participation by the public is not supported by evidence. In summer 2022 when the Recirculated Draft EIR was released, many COVID-19 precautions remained place; however, schools and businesses had generally re-opened and in-person public events such as city council meetings and community gatherings had largely resumed. To accommodate those who were comfortable resuming public activities and those who were not, the Recirculated Draft EIR was made available both on-line and at libraries for in-person or remote access. Similarly, the public hearings include both in-person events and a virtual event to provide for maximum access and accommodate health concerns related to the COVID-19 pandemic. Additionally, recordings of the public hearings were provided on Metro's website. Consistent with standard practices and health guidance at the time of the public hearings, staff wore protective facemasks and attendees were encouraged, but not required, to also wear facemasks. Facemasks were provided to anyone who wished. Other precautions at the in-person hearings including practicing social distancing, staff holding of the microphone, and provision of hand sanitizers and "clean" and "dirty" pen receptacles. Additionally, one of the hearings was held fully outdoors and one was partially outdoors. For those who wished to comment on the Recirculated Draft EIR but not attend the public hearings, comments were accepted via mail, email, Metro's website, and voicemail.

## Comment I-161-5

b. Was released during summer months when residents typically are not as available. Additionally, during the summer residents are unable to do outreach at schools.

### Response to I-161-5

The CEQA Guidelines do not establish a required or recommended time of year for release of a document for public review, nor are the requirements for the length of the public review period based on the time of year. Therefore, the time of year does not have bearing on the length of the public review period. The 45-day public review period required under CEQA was extended to 60-days to give agencies and public additional time to review and comment on the document. Regarding conducting outreach at school, CEQA does not have a requirement about where outreach should be conducted. Further, see Response to Comment I-161-3 regarding outreach efforts after release of the Recirculated Draft EIR. Additionally, outreach was conducted prior to the Recirculated Draft EIR release, including at several community events along the corridor.

### Comment I-161-6

c. Was released when residents have other projects to respond to. The Metro Area Plan had community meetings. The I-710 South Corridor Project has had numerous meetings during this time period and the Metro Area Plan Historical Context Statement had a deadline to respond of August 22, 2022. Many community residents who are more active have had their hands full responding to these documents.

### Response to I-161-6

There is no CEQA requirement to coordinate a public review period with other documents/projects that might also be taking place in the project vicinity or to extend a public review period for this reason.

### Comment I-161-7

3) The document contains substantive errors and omissions.

Although, I have not had time to fully analyze the DEIR, my limited review thus far has revealed several substantive errors and omissions.

A. The impacts to residents of East Los Angeles in terms of loss of businesses is not clearly stated. There is no documentation in the main DEIR that shows the names and addresses of the businesses that will be loss or that in anyway analyzes what will be the impacts to area residents from the loss of these businesses.

a) This is concerning as residents of East Los Angeles have contemplated Cityhood for East Los Angeles the loss of businesses will further make this more difficult for area residents.

b) East Los Angeles needs more businesses and supermarkets. The location of the Atlantic/3rd/Beverly station used to house a grocery store. Before the freeways, East Los Angeles used to have grocery stores. Now, resident's access to fresh healthy foods from super markets and produce centers is limited. Some might even call it a food desert.

### Response to I-161-7

The comment regarding desire for inclusion of addresses in the EIR noted. CEQA Section 15151 states that “An EIR Should be prepared with a sufficient degree of analysis to provide decision makers with information which enable them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effect of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is

reasonably feasible." The parcel numbers provided were determined to be reasonable feasible for meeting the purpose of an EIR. See also Response to Comment CO-1-4.

See Responses to Comments A-8-21 and B-2-9 regarding economic and social impacts and impacts to businesses. The provision of grocery stores is beyond the scope of the Project need and objectives.

### Comment I-161-8

B) How this project will impact housing is not addressed. A presentation on the Metro Area Plan seemed to designate some of the business areas that will be lost as areas for Transit Oriented Development, including housing which would be 80 percent Market Rate and 20 percent "affordable". We have seen such plans with 80 percent market rate projects putting upward pressure on area rents in surrounding neighborhoods. Developers typically choose the plans which tender the least number of units that are affordable. See https://jorgedelaroca.name/p_latoc.pdf. Housing accessible by lower middle income and middle income residents is not the choice of developers.

### Response to I-161-8

The commenter asserts that impacts to housing are not addressed, however, that is not correct. As explained in Section 3.12.6.2 of the Recirculated Draft EIR, while construction of the Project would result in acquisition of non-residential properties, no residential parcels would be acquired. Operation of the Project would occur within the transportation ROW and at the new stations. Under the Project, no acquisition of residential structures would occur; therefore, no people or housing would be displaced and there would be no need for replacement housing. While the Project may encourage growth in surrounding areas, that growth would be contingent upon local city zoning regulations and approvals, which would consider a development's consistency with local general plans and transit oriented development policies; therefore, any growth is anticipated to be consistent with local polices and requirements, and local growth projections. Also see Responses to Comments A-8-21 and B-2-9 regarding economic and social impacts and impacts to businesses.

The Project is distinct and separate from the Metro Area Plan being proposed by the County of Los Angeles and subject to a separate CEQA evaluation and approval process. The comment regarding affordable housing is outside the scope of the Project and the Recirculated Draft EIR.

### Comment I-161-9

C) Will this gentrify East Los Angeles? See Transit Oriented Displacement, MIT Press by Karen Chapple and Anastasia Loukaitou-Sideris.

D) The DEIR fails to correctly analyze race and ethnicity and its impacts on environmental justice communities. Because it uses the Race Series instead of the Hispanic Race Series it fails to identify an environmental justice community. Since it has not identified the community properly it cannot and does not evaluate the impacts and burdens on the environmental justice community of East Los Angeles. Table 6-4, in Appendix M shows a community that is 51 percent White. According to Dr. Manuel Pastor, "The percent "minority" is defined – particularly in California – as the share of the population that is not non-Hispanic white. So, it's Latinos plus non-Hispanic (NH) Black, NH-AAPI, NH-Native Americans, and NH Other/mixed."

See the website, the National Equity Atlas for the definition of race/ethnicity.

https://nationalequityatlas.org/about-the-atlas#data

The state of California uses a similar method:

https://dof.ca.gov/forecasting/demographics/

This is important, because CEQA requires that environmental impacts must be considered in context, cities and counties should pay special attention to whether a project might cause additional impacts to communities that already are affected by, or particularly vulnerable to, environmental impacts like air and water pollution.

By using incorrect analysis and methods the Metro DEIR cannot correctly evaluate the impacts to communities of color/ environmental justice communities and in this instance to the Latinx community of East Los Angeles.

See below a portion of Table 6-4 of Appendix M which identifies the population within a half mile of the stations as being 51 percent white.

*[See the table in the original Comment Submission I-161 located in Appendix A of the Final EIR]*

## Response to I-161-9

The potential for the Project to create equity disparities and promote gentrification is largely beyond the scope of CEQA to address. As identified in Section 3.17, Growth Inducing Impacts, of the Recirculated Draft EIR, Metro takes social justice and equity very seriously with its own Metro Board adopted Equity Platform. The Platform is explicit in its focus on the vast disparities that exist in access to opportunity and is intended to help identify and implement projects or programs that reduce and ultimately eliminate those disparities. Metro has considered social justice and equity through the deliberate location of proposed stations to service populations. TOD planning can also be supported by Metro's Equity Platform by enhancing areas surrounding the proposed stations to accommodate all levels of access and income. The Project could indirectly affect development in the surrounding areas by focusing growth on housing, employment, and commercial development within walking distance of the proposed stations along the Project corridor. This development pattern would be consistent with regional goals as discussed in Section 3.17. To learn more about Metro's efforts to address economic and physical displacement, refer to Metro's website at https://www.metro.net/about/gentrification-displacement/. See also Response to Comment B-2-9.

The commenter also states that the Recirculated Draft EIR incorrectly analyzed race and ethnicity by specifically not including the non-white population that fall under the Non-Hispanic or Latino ethnicity. A correction to Table 3.12-4 has been identified as described below. The correction does not alter the analysis presented in Section 3.12, Population and Housing because the minority composition that was previously identified in Table 3.12-4 is not different from what is now presented in corrected Table 3.12-4. The people identified as Non-Hispanic or Latino (excluding White alone) adds approximately six percent to the total minority composition.

The commenter's assertion that CEQA requires the analysis to analyze impacts specific to environmental justice communities is incorrect. There are currently no formal requirements or procedures to evaluate potential direct or indirect impacts specific to environmental justice communities under CEQA and the CEQA Guidelines. Clarification is needed regarding the commenter's statement that environmental impacts be considered in context. Section 15125 of the

CEQA Guidelines identify that an EIR must include a description of the "physical environmental conditions in the vicinity of the project." Pursuant to Section 15125, this environmental setting constitutes the baseline physical conditions used to determine whether an impact is significant. Section 15125(c) identifies that the knowledge of this physical setting is critical in the assessment of environmental impacts and the emphasis should be on environmental resources that are rare or unique and that would be affected by the project and that the EIR must "permit the significant effects of a project to be considered in full environmental context." (CEQA Guidelines 15125(c)). The physical environmental conditions in the vicinity of Project have been identified for every resource topic evaluated in the Recirculated Draft EIR (see the Existing Setting in Subsection 5 of each resource topic discussed in Chapter 3 of the Recirculated Draft EIR). These conditions typically constitute the baseline that is used to evaluate the Project's impacts. See Section 3.0.2.1 on page 3.0-2 of the Recirculated Draft EIR for additional information.

Regarding the demographic characteristics of census tracts within 0.5 miles of stations presented in Table 3.12-4 on page 3.12-6 of the Recirculated Draft EIR and Table 6-4 on page 38 of Appendix M, Community and Neighborhoods Impacts Report, those tables have been revised to reflect the following corrections, which are shown in strike-through (deleted) and underlined italicized (new) text:

**Table 3.12-4. General Demographic Characteristics of Census Tracts within 0.5 Miles of Stations**

| | Persons | % of Population |
|---|---|---|
| **Race** | | |
| White | 60,584 | 51% |
| Black or African American | 1,238 | 1% |
| American Indian and Alaska Native | 1,014 | 1% |
| Asian | 5,155 | 4% |
| Native Hawaiian / Other Pacific Islander | 170 | ~~0~~<*1*% |
| Some other race[1] | 49,122 | 41% |
| Two or more races[2] | 2,476 | 2% |
| **Ethnicity** | | |
| Hispanic or Latino (of any race)[3] | 106,823 | ~~N/A~~ *89%* |
| *Not Hispanic or Latino (Some other race)* | *7,277* | *6%* |
| *Not Hispanic or Latino (White alone)* | *5,659* | *5%* |
| *Minority*[4] | *114,100* | *95%* |
| **Transit-Dependent Population Groups** | | |
| Students Age 5-19 | 25,062 | 21% |
| Age 65+ Years | 14,802 | 13% |
| **Mode of Transportation to Work** | | |
| Car, Truck or Van – Drove Alone | 41,143 | 77% |
| Car, Truck or Van – Carpool | 5,987 | 11% |
| Public Transportation for Work | 2,650 | 5% |

**Table 3.12-4. General Demographic Characteristics of Census Tracts within 0.5 Miles of Stations**

| | Persons | % of Population |
|---|---|---|
| Work from Home | 1,421 | 3% |
| Walked | 1,327 | 2% |
| Taxicab, Motorcycle, Bicycle or other Means | 731 | 1% |
| **Poverty Levels** | | |
| Total Population Below Poverty Level | 18,205 | 15% |

Source: 2015-2019 American Community Survey (ACS) 5-Year Estimates for Census Tracts.
*Notes:*
1 *Includes responses in the 2019 U.S. Census for "Black or African American," "American Indian or Alaska Native," "Asian," and "Native Hawaiian or Other Pacific Islander" race categories listed in the rows above. Also respondents providing write-in entries such as multiracial, mixed, or interracial in the "Some Other Race" write-in space are included in this category.*
2 *Includes those people who chose to provide two or more races on the U.S. Census by selecting two or more race response check boxes. There are 57 possible combinations involving the race categories (Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian or Other Pacific Islander, and/or Some Other Race).*
3 *Includes Mexican, Puerto Rican, Cuban, and Other Hispanic or Latino groups.*
4 *Includes the sum of Hispanic or Latino (of any race) and Not Hispanic or Latino (Some other races).*

## Comment I-161-10

A memo issued by the office of then California Attorney General Kamala Harris, now United States Vice President, stated:

Cities, counties, and other local governmental entities have an important role to play in ensuring environmental justice for all of California's residents. Under state law: "[E]nvironmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

## Response to I-161-10

As outlined in the *Environmental Justice at the Local and Regional Level* (2012) fact sheet issued by the Office of the California Attorney General Kamala Harris (2012 California Attorney General Environmental Justice Fact Sheet),[5] there are a number of state laws and programs relating to environmental justice. The 2012 California Attorney General Environmental Justice Fact Sheet focuses on two sources of environmental justice-related responsibilities for local governments: those contained in Government Code section 11135, subdivision (a) and CEQA. Regarding Government Code section 11135, subdivision (a), that provision states:

> No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state....

The Office of the Attorney General Environmental Justice Fact Sheet explains that although this provision does not include the phrase "environmental justice," in certain circumstances, it can require local agencies to consider fairness in the distribution of environmental benefits and

[5] State of California Department of Justice. 2012. Environmental Justice at the Local and Regional Level Legal Background. https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf.

burdens. As pertinent to the Eastside Transit Corridor Phase 2 Project, the Build Alternatives foster equal access to a clean environment and public health benefits (such as public transportation) and do not result in the unmitigated significant impacts that could affect public health, such as air quality, hazardous materials, noise, and water quality impacts.

Regarding CEQA, the Office of the Attorney General Environmental Justice Fact Sheet explains that the importance of a healthy environment for all of California's residents is reflected in CEQA's purposes, which include the following:

- The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern (Pub. Res. Code, § 21000, subd. (a)). The analysis and conclusions of the Recirculated Draft EIR align with this Legislative goal as follows:
    - **Air Quality**: As described in Section 3.2.6 of the Recirculated Draft EIR, the construction and subsequent operation of the Build Alternatives[6] would reduce regional passenger vehicle VMT and associated criteria pollutants, consistent with the VMT-reducing objectives of the Air Quality Management Plan (AQMP). The Project would not delay the timely attainment of air quality standards or interim emission reductions specified in the AQMP. Construction and operational emissions would be below the SCAQMD threshold and impacts related to regional criteria pollutant emissions would be less than significant. Operation of the Build Alternatives would not expose sensitive receptors to substantial carbon monoxide (CO) concentrations, and construction for on-site emissions would be less than the SCAQMD localized significance thresholds (LST) and localized criteria pollutant concentrations. Operation and construction of the Build Alternatives would have less than significant impacts with respect to other emissions (such as those leading to odors) with the potential to adversely affect a substantial number of people.
    - **Water Quality**: As described in Section 3.9.6 of the Recirculated Draft EIR, which has been revised in the Final EIR, operation of the Build Alternatives would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Water quality impacts could potentially result from construction of the Build Alternatives related to stormwater runoff, ground disturbance, and encountering known and/or unknown groundwater contamination in the vicinity of the DSA. However, implementation of a Storm Water Pollution Prevention Plan (SWPPP) and Best Management Practices (BMP) to control erosion, as identified in project measure PM HWQ-2 as revised in the Final EIR, would reduce any potential impacts related to stormwater runoff. Project measure PM HWQ-3 and mitigation measures MM HWQ-1 would reduce impacts from in water work under Alternative 1 (e.g., release of contaminated in water) to less than significant. Alternatives 2 and 3 would not have impacts related to in water work as they would not cross the rivers; therefore PM HWQ-3 and MM HWQ-1 would not be applicable to these alternatives. MM HAZ-2 would help minimize the spread of contaminated groundwater and MM HAZ-3 requires contractors to inspect groundwater for signs of contamination and halt work and test materials if contaminated groundwater is found, which would reduce impacts to less than significant. These project measures and mitigation measures are provided in Section 3.9.7 of the Draft

[6] Impacts from the base Alternative 1 are generally the same as impacts from Alternative 1 with the design options and Alternatives 2 and 3 with or without the design options, except where noted.

Recirculated EIR and PM HWQ-2 has been revised in the Final EIR, as discussed in Response to Comment A-3-4.

- Identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds from being reached (*Id.* at subd. (d)). The analysis and conclusions of the Recirculated Draft EIR are consistent with this Legislative direction, as follows:

  - **Air Quality**: As described in Section 3.2.6 of the Recirculated Draft EIR, operation of the Build Alternatives would not expose sensitive receptors to toxic air contaminates (TAC) that would be likely to cause a substantial increase in human health risks. Construction of the Build Alternatives would result in local exposure to TAC that would be less than the SCAQMD Tier 2 screening criteria for acute, chronic, and carcinogenic exposure; therefore, impacts with respect to construction human health risk would be less than significant. For operations, TAC from vehicle exhaust is expected to decrease proportional to regional reductions in VMT.

  - **Hazards and Hazardous Materials**: As described in Section 3.8.6 of the Recirculated Draft EIR, which has been revised in the Final EIR, compliance with existing regulations would ensure proper transportation, use, and storage of hazardous materials, and the handling of hazardous materials within one-quarter mile of an existing school, would be less than significant during operation and construction. As identified in PM HAZ-1, storage and disposal of hazardous materials and waste would be conducted in accordance with all federal and state regulatory requirements that are intended to prevent or manage hazards, and if a spill does occur, it would be remediated accordingly. Therefore, operation of the Build Alternatives would have a less than significant impact related to creating a significant hazard to the public or the environment from the release of hazardous materials. As described in PM HAZ-2 as revised in the Final EIR, Metro's contractor shall obtain permits and comply with appropriate regulatory standards design to avoid hazardous waste releases during construction. Implementation of MM HAZ-1 through MM HAZ-5, would ensure that workers have a clear understanding of hazardous materials that may occur in the construction area as well as procedures and plans for safely handling and minimizing risk from hazardous materials; thus, impacts would be reduced to less than significant. These mitigation measures are provided in full in Section 3.8.7.2 of the Recirculated Draft EIR and revised in the Final EIR; revisions to MM HAZ-1 are discussed in Response to Comment A-11-20.

  - **Public Services**: As described in Section 3.13.6 of the Recirculated Draft EIR, which has been revised in the Final EIR, the demand for fire and police protection is anticipated to remain at acceptable levels and would not require new fire or police protection facilities or physical alterations to existing fire or police protection facilities during operation and construction. The Build Alternatives would not result in the need for new construction or physical alterations to schools that could cause significant environmental impacts to maintain acceptable service during operations and construction.

- Major consideration must be given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian (*Id.* at subd. (g)). Consistent with this objective, the Recirculated Draft EIR gives major consideration to preventing environmental damage, while not adversely affecting the provision of housing or a satisfying living environment, as discussed below:

  - **Population and Housing**: As described in Section 3.12.6 of the Recirculated Draft EIR, which has been revised in the Final EIR, operation and construction of the Build Alternatives would not induce unplanned population growth or dramatically stimulate development. Operation of the Build Alternatives would occur within the transportation ROW and at the new stations; therefore, operation and construction of the Build Alternatives would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere and no impact would occur. For additional information on growth-inducing impacts and benefits of the Project, see Section 3.17.6 of the DEIR and Response to Comment CO-7-3 and B-2-9 for additional information on growth-inducing impacts.

  - **Recreation**: As described in Section 3.13.6 of the Recirculated Draft EIR, the Build Alternatives would not induce a substantial number of new visitors to parks and recreational facilities such that substantial deterioration would occur. Therefore, impacts on recreation would be less than significant. Additionally, no new recreational facilities or expansion of existing recreational facilities would be included as part of the operation and construction of the Build Alternatives, and no impacts would occur.

- Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise (Pub. Res. Code, § 21001, subd. (b)). As demonstrated in the Recirculated Draft EIR, and summarized below, the Project, as mitigated, would not result in significant air quality, water quality, aesthetic, or noise impacts. Further, impacts to historic resources will be mitigated to the extent feasible.

  - **Air Quality**: Refer to the previous sections describing air quality impacts.

  - **Water Quality**: Refer to the previous sections describing water quality impacts.

  - **Aesthetics (natural and scenic)**: As described in Section 3.1.6 of the Recirculated Draft EIR, no scenic vistas are present in the DSA. Views of surrounding landscapes and topography are available but not considered unique or of aesthetic significance. Construction and operation of the Build Alternatives would not substantially obstruct views of the San Gabriel Mountains, Puente Hills, or downtown Los Angeles skyline; therefore, impacts would be less than significant. Based on a review of the general plans and community plans of those jurisdictions, no state- or local-designated scenic highway, or eligible state scenic highways are located in the DSA. Therefore, operation and construction of the Build Alternatives would not damage any scenic resources (e.g., trees, rock outcroppings, or historic buildings) within the viewshed of a state scenic highway, and no impact would occur. Operation and construction of the Build Alternatives would not conflict with local zoning ordinances pertaining to scenic quality and impacts would be less than significant. The Build Alternatives would create a negligible addition to light and

glare and would not constitute a substantial change in existing light and glare in the immediate area. Therefore, operation and construction of the Build Alternatives would have a less than significant impact related to light and glare.

- **Cultural Resources (Historic, Archaeological, and Human Remains)**: As described in Section 3.4.6 of the Recirculated Draft EIR, operation of Alternative 1 and Alternative 3 with the Montebello MSF site option would not physically demolish, destroy, relocate, or alter any historical resources. Additionally, noise and vibration impacts would not exceed the FTA impact criteria at any historical resources, and visual changes would not cause a substantial adverse change in the significance of a historic resource. Project activities during construction of the alignment would include property acquisitions, demolition of historical resources, and new construction of permanent Project features. The Golden Gate Theater would not be physically demolished, destroyed, relocated, or altered due to the underground nature of the improvements, and MM CUL-1 would reduce the potential for vibration generated during construction activities to damage the Golden Gate Theater to less than significant. Six contributing resources within the Vail Field Industrial Addition would be acquired primarily as ROW acquisition to enable construction of the guideway and would potentially be demolished. However, the potential historic district, with a reduced boundary, would still convey its historical significance and would be eligible for listing in the CRHR; therefore, construction of Alternative 1 and Alternative 3 with the Montebello MSF site option would not have a substantial adverse change on the Vail Field Industrial Addition and would result in a less than significant impact. Operation of the Build Alternatives would not physically demolish, destroy, relocate, or alter any archaeological resources and would thus have no impact on archaeological resources. MM CUL-7 and MM CUL-8 would be implemented to reduce impacts to less than significant related to the potential to disturb and destroy a significant unknown archaeological resource. Additionally, there are no known cemeteries or archaeological sites including human remains within the Area of Direct Impact (ADI); therefore, operational activities would not involve excavation and would not have the potential to disturb any human remains, including those interred outside of formal cemeteries. MM CUL-9 would be implemented to ensure proper treatment of human remains would occur if discovered during construction.

- Under Alternative 2, 16 properties in the Vail Field Industrial Addition historic district would be acquired and demolished. Under Alternative 1 and Alternative 3, 16 properties in the Vail Field Industrial Addition historic district and the Pacific Metals Company Building would be acquired and demolished if the Commerce MSF site option is selected. The physical demolition would materially impair the significance of the historical resources; thus, construction of the Commerce MSF site option would result in a significant impact on historic resources. With implementation of mitigation measures MM CUL-2, MM CUL-3, MM CUL-5, and MM CUL-6, as identified in Section 3.4.7 of the Recirculated Draft EIR and as revised in the Final EIR, impacts would be reduced; however, impacts resulting from demolition or alterations with the Commerce MFS site option would remain significant and unavoidable. Impacts of Alternative 1 or Alternative 3 with the Montebello MSF site option are less than significant with mitigation.

- **Paleontological Resources**: As described in Section 3.4.6 of the Recirculated Draft EIR, the Build Alternatives are in area of high sensitivity for paleontological resources, which means that paleontological resources are likely to be present, and loss of paleontological resources could occur during construction. Implementation of MM GEO-1 through MM GEO-4 as identified in Section 3.4.6 of the Recirculated Draft EIR and revised in the Final EIR, would reduce the potential impact on paleontological resources. However, because monitoring of tunnel boring is not feasible, unique paleontological resources may be destroyed and impacts would be significant and unavoidable.

- **Noise**: As described in Section 3.11.6 of the Recirculated Draft EIR, noise generated by passby LRT vehicles, special trackwork, and the TPSS's would not exceed the FTA moderate noise impact criteria at any sensitive receptors along the Project alignment. The closest noise-sensitive receptors at most grade crossings are shielded by commercial buildings. None of the Project noise levels at the parks, schools, libraries, hospitals, or churches are predicted to exceed the FTA moderate or severe impact criteria along the Project alignment. Therefore, impacts would be less than significant during operations. Compliance with PM NOI-1 and PM NOI-2 would reduce potential noise impacts during construction. Additionally, MM NOI-1 through MM NOI-11, as identified in Section 3.11.7.2 of the Recirculated Draft EIR and revised in the Final EIR, would include implementation of noise control measures such as establishing a noise control plan that would specify construction noise limits for daytime or nighttime work near sensitive receivers, which would reduce impacts to less than significant.

In addition to the Legislative findings identified above, the Office of the Attorney General Environmental Justice Fact Sheet further explains that specific provisions of CEQA and the CEQA Guidelines require that local lead agencies consider how the environmental and public health burdens of a project might specially affect certain communities based on the environmental setting and cumulative impacts. The Recirculated Draft EIR considers such impacts, as summarized below:

- Environmental Setting and Cumulative Impacts

  - **Environmental Setting**: Refer to text above describing impacts to the environmental setting.

  - **Cumulative Impacts**: As summarized in Table 3.18-4 of the Recirculated Draft EIR, the Project's contribution would not be cumulatively considerable for all resources analyzed, except cultural resources with the Commerce MSF site option and paleontological resources. As discussed in Section 3.18 of the Recirculated Draft EIR, acquisition and demolition of historic resources associated with construction of the Build Alternatives if the Commerce MSF site option is selected would remain significant and unavoidable. Additionally, as described above, the significant impact from tunnel boring activities on paleontological resources could not be reduced by mitigation measures and would remain significant and unavoidable.

The Office of the Attorney General Environmental Justice Fact Sheet also explains that, although CEQA does not apply to social or economic impacts, such impacts may be relevant in determining significance under CEQA in two ways. First, social and economic impacts may lead to physical

changes on the environment that are significant. Second, economic and social effects of a physical change to the environment may be considered in determining whether the physical change is, in fact, significant. These issues are discussed as follows:

- **Social Impacts (Land Use)**: As described in Section 3.10.6 of the Recirculated Draft EIR, operation and construction of the Build Alternatives would require property acquisition generally limited to properties currently zoned for commercial or industrial uses, and no residential uses, churches, schools, parks, or other sensitive land uses would be permanently acquired. The new uses would be consistent with existing commercial and industrial uses and the land use characteristics of the transportation corridor. The properties under construction easements would retain their original land use designation and zoning classifications, and upon termination of the construction easement, would likely return to their original use. Properties acquired for construction activities may, upon completion of the construction activities, be available for joint development or parking facilities subject to standard planning and permitting review processes separate from this environmental review process. The property acquisition and change in uses under the Build Alternatives would not affect vehicular, bicycle, or pedestrian access, and would not physically divide an established community. Therefore, operation and construction of the Build Alternatives would not physically divide an established community and would result in a less than significant impact.

- **Economic Impacts**: As described in Section 3.12.6 and Section 3.17.6 of the Recirculated Draft EIR, the Build Alternatives would not include development of new housing or businesses that would directly induce population growth. Operation of the Build Alternatives is not anticipated to change existing growth and development patterns and any such housing and business development growth would be contingent upon local city zoning regulations and approvals, which would also consider a development's consistency with local general plans and transit oriented development policies. While construction of the Build Alternatives would result in acquisition of non-residential properties, no residential parcels would be acquired. See Response to Comment A-8-21 regarding acquisition of non-residential properties. As required by law, Metro would comply with the provisions of the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act) (if federal funding is used for the Project) and the California Relocation Act (in the absence of federal funds for the Project). The Uniform Act mandates that certain relocation services and payments be made available to eligible residents, businesses, and nonprofit organizations displaced as a direct result of projects undertaken by a federal agency or with federal financial assistance. The California Relocation Act applies in the absence of federal funds and/or involvement if a public entity undertakes a project and consequently must provide relocation assistance and benefits. The California Relocation Act is discussed further in Section 3.12.2.1.1 of the DEIR. Owners of private property have state constitutional guarantees that their property will not be acquired, taken, or damaged for public use unless they first receive an offer of just compensation. A just compensation amount is measured by the "fair market value" (FMV) of the real estate property interests and rights acquired. See also Response to Comment A-8-21 for additional information on small businesses and Response to Comment I-189-2 for additional information on access concerns to businesses in the Recirculated Draft EIR. See Response to Comment CO-7-3 and B-2-9 for additional information on growth-inducing impacts.

Further, Section 3.10, Land Use, or the Recirculated Draft EIR has been revised to identify that the acquisition of property would not result in economic or social affects that would have physical impacts. The text on page 3.10-9 and page of 40 Appendix K has been revised as follows:

> Property acquisition would be generally limited to properties currently zoned for commercial or industrial uses, and no residential uses, churches, schools, parks, or other sensitive land uses would be permanently acquired. *Relocation assistance and benefits would be provided to displaced businesses in compliance with state and federal regulations and Metro's policies. Because the properties acquired for construction activities would be available for future use under the same land use designations, property acquisitions are not anticipated to result in economic or social harm that could lead to physical impacts such as deterioration of the local area and other surrounding businesses. While economic impacts could occur to other businesses that depend on the revenue generated by transactions with businesses that would be displaced by the Project, since 2014, Metro has launched pilot programs that provide financial assistance to small businesses located along rail corridors under construction. These programs include a Metro Business Interruption Fund, a Metro Business Solution Center, and Metro's Eat Shop Play Local business mitigation program meant to bring focused attention to local businesses affected by Metro construction, would be implemented. Additionally, Metro's Construction Relations Officers will work with local businesses to provide signage and marketing assistance, such as providing "Open During Construction," wayfinding, and promotional signage for businesses. Therefore, the property acquisition for construction under Alternative 1 would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Construction of Alternative 1 would be conducted in compliance with local land use plans and codes, including the provision of noise control measures in order to avoid conflict with the goals of local noise ordinances.* Therefore, *t*~~T~~he construction of Alternative 1 would result in a less than significant impact.

Another aspect of CEQA identified in the Office of the Attorney General Environmental Justice Fact Sheet is CEQA's substantive mandate that public agencies shall not approve projects with significant environmental impacts if there are feasible alternatives or mitigation measures that would substantially lessen or avoid those effects. The Recirculated Draft EIR identifies alternatives and mitigation measures that would reduce or eliminate the potential environmental impacts of the Build Alternatives, as discussed below:

- **Alternatives (Project Benefits)**: As shown in Table 5-3 of the Recirculated Draft EIR, Alternatives 1 and 3 would provide the highest level of environmental benefits considering the length of the alignments and number of proposed stations that would also best support the Project objectives by providing regional connectivity and new transit access for local communities. Alternative 3 with the Montebello MSF site option, with or without the design alternatives, would be the environmentally superior alternative as it would result in a lower number of significant and unavoidable impacts compared to Alternatives 1, 2, and 3 with the Commerce MSF site option, and smaller level of environmental effects when compared to the full build-out of the Alternative 1 with Montebello MSF site option.

- **Mitigation**: Proposed mitigation measures specific to each CEQA threshold are summarized in Table ES-3 and are described in greater detail within the impact evaluation sections for the environmental topics. Other interested parties and the public had the opportunity to review and provide comments on the proposed mitigation measures during the 60-day public comment period, commencing on Thursday, June 30, 2022, and concluding on Monday, August 29, 2022, as documented in the Notice of Availability. Section 21081.6 of the California

Public Resources Code requires that, upon certification of an EIR, a lead agency must adopt a "reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." As lead agency for the Project, Metro is responsible for administering and implementing a Mitigation Monitoring and Reporting Program (MMRP) for the Project. The MMRP for the Project will be included as Chapter 4 of the Final EIR.

Lastly, the Office of the Attorney General Environmental Justice Fact Sheet explains that the Statement of Overriding Considerations that a lead agency must adopt before it may approve a project with significant and unavoidable impacts provides a mechanism for transparency in the decision-making process as to how the benefits and impacts of a project are distributed. For example, if the benefits of the project will be widely felt, but the environmental burdens of the project will be experienced particularly by the neighboring communities, this should be stated in the Statement of Overriding Considerations.

- The Metro Board of Directors will weigh the Project's benefits against its environmental impacts, including in reaching a decision as to whether to approve the Project. As required under CEQA, if the Metro Board of Directors determines to approve the Project, it will adopt a Statement of Overriding Considerations that explains the specific reasons the Board of Directors found the benefits of the Project to outweigh its adverse impacts.

### Comment I-161-11

Although CEQA focuses on impacts to the physical environment, economic and social effects may be relevant in determining significance under CEQA in two ways. (See CEQA Guidelines, §§ 15064, subd. (e), 15131.) First, as the CEQA Guidelines note, social or economic impacts may lead to physical changes to the environment that are significant. (Id. at §§ 15064, subd. (e), 15131, subd. (a).) To illustrate, if a proposed development project may cause economic harm to a community's existing businesses, and if that could in turn "result in business closures and physical deterioration" of that community, then the agency "should consider these problems to the extent that potential is demonstrated to be an indirect environmental effect of the proposed project." (See Citizens for Quality Growth v. City of Mt. Shasta (1988) 198 Cal.App.3d 433, 446.)

### Response to I-161-11

See Response to Comment I-199-16 regarding CEQA requirements related to social and economic effects, Response to Comment I-161-9 regarding the CEQA analysis to environmental justice communities, Response to Comment 1-161-10 regarding consistency of the CEQA analysis with the 2012 California Attorney General Environmental Justice Fact Sheet, and Response to Comment A-8-21 for additional information on small businesses.

### Comment I-161-12

Government Code

Government Code section 11135, subdivision (a) provides in relevant part: No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state..

While this provision does not include the words "environmental justice," in certain circumstances, it can require local agencies to undertake the same consideration of fairness in the distribution of environmental benefits and burdens discussed above.

### Response to I-161-12

See Response to Comment I-199-16 regarding CEQA requirements related to social and economic effects, Response to Comment I-161-9 regarding the CEQA analysis to environmental justice communities, Response to Comment 1-161-10 regarding consistency of the CEQA analysis with the 2012 California Attorney General Environmental Justice Fact Sheet, and Response to Comment A-8-21 for additional information on small businesses in the Recirculated Draft EIR.

### Comment I-161-13

Where, for example, a general plan update is funded by or receives financial assistance from the state or a state agency, the local government should take special care to ensure that the plan's goals, objectives, policies and implementation measures (a) foster equal access to a clean environment and public health benefits (such as parks, sidewalks, and public transportation); and (b) do not result in the unmitigated concentration of polluting activities near communities that fall into the categories defined in Government Code section 11135. In addition, in formulating its public outreach for the general plan update, the local agency should evaluate whether regulations governing equal "opportunity to participate" and requiring "alternative communication services" (e.g., translations) apply. (See Cal. Code Regs., tit. 22, §§ 98101, 98211.)

### Response to I-161-13

See Response to Comment I-161-9 regarding the CEQA analysis to environmental justice communities and see Response to Comment 1-161-10 regarding consistency of the CEQA analysis with the 2012 California Attorney General Environmental Justice Fact Sheet. Although the Project does not involve a general plan update, the Project would foster equal access to a clean environment and public health benefits (such as public transportation) and does not result in the unmitigated significant impacts that could affect public health, such as air quality, hazardous materials, noise, and water quality impacts.

### Comment I-161-14

Note the direction in the footnote:

**1 To support a finding that such concentration will not occur, the local government likely will need to identity candidate communities and assess their current burdens.**

The DEIR fails in this regard, because it has failed to identify the communities properly and to evaluate their burdens.

For the foregoing reasons, I request that the DEIR be withdrawn or alternatively that the comment period be extended.

cc: Los Angeles County Supervisor Hilda Solis, Senator Maria Elena Durazo and Assemblyperson Wendy Carrillo

### Response to I-161-14

See Response to Comment I-161-9 regarding the CEQA analysis to environmental justice communities and see Response to Comment 1-161-10 regarding consistency of the CEQA analysis with the 2012 California Attorney General Environmental Justice Fact Sheet. The project, as mitigated, would not result adverse impacts on public health, including those related to air quality, noise, hazards and hazardous materials, and water quality, during both construction and operational phases. Consequently, there will be no disproportionate effects on any group, as the project effectively eliminates such potential impacts. See Responses to Comment CO-5-1 and I-161-2 regarding the request to withdraw the EIR or extend the comment period.

## I-162: Diana Gomez

### Comment I-162-1

I wanted to express my comments against the extension of the gold line in my city of Pico Rivere. This train extension will negatively impact Pico Rivera in the following ways, first of all, the street Washington is already a heavy transional traffic street that people use to commute to nearby businesses, its highly populated community, traffic will increase due to elimInes to accomodate the train an issue that is evident on your above grade train station located at 3rd street in LA.

### Response to I-162-1

The commenter's opposition to the Project is noted. See Response to Comment I-43-1 and Response to Comment I-190-3 regarding changes to travel lanes. See Response to Comment I-21-1 regarding traffic.

### Comment I-162-2

Second, parking issues, commuters will park nearby to ride the train which will impact our residents, metro has stated that they don't plan to build parking because commuters will ride their bikes or walk to stations which is not true, does Metro see people riding bikes at 4 in the morning when people are commuting to work?. Third, increase crime at stations, fights and drug use. These problems are evident on your above grade train located on 3rd street, this is why commuters don't ride your trains.

### Response to I-162-2

The commenter states that the Project would not include parking facilities. However, this is not the case; as described in Section 2.5.1.2 of Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the Atlantic/Pomona station (relocated/reconfigured), and surface parking would be provided at each of the at-grade stations. See Response to Comment I-7-3 regarding policing and crime.

### Comment I-162-3

Lastly, increased homeless population. The train located on 3rd street in LA already displays issues with the homeless population. If this train is extended, homeless people will now commute to other nearby cities. Metro spoke about mitigation programs to compate the homeless and unsheltered individuals but the reality is that the train stations attract homelessness and crime in order to mitigate that is not to build the extension. Metro also stated that the homeless population is a state issue but i disagree its a city of LA issue, the city is now plagued by homelessness,

rampant drug use and crime. The residents Pico Rivera do not want our city to be similar to LA. Why does metro think we need a train in our city? Do metro employees commute to work in trains? For those that do not, i urge you to ride the 3rd street metro line and see firsthand what you are creating.

### Response to I-162-3

See Response to Comment A-8-19 regarding security and people experiencing homelessness and Response to Comment I-7-3 regarding crime. Regarding the project need, see Response to Comment I-10-5. See Response to Comment I-13-1 regarding ridership.

### Comment I-162-4

I begin to question the reason why Metro wants to extend the gold line when the residents don't want it, is to increase your profits due to a 30% rideshare decrease over the years? Metro needs to look at the statistics and determine that rideshare has decreased. So why build another train? People have spoken with their pockets and stopped riding your trains for the reasons mentioned above.

### Response to I-162-4

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership.

### Comment I-162-5

Another comment is that metro did a bad job in outreach, I didn't not see any signs around my city regarding community meetings, since this will severely impact my city and residents, no street banners, no posters adjacent to rail construction sites or neighborhoods, Metro did the bare minimal in outreach, i received one postcard via mail, thats it.

### Response to I-162-5

As described in Chapter 6, Public Outreach, of the Recirculated Draft EIR, since fall 2021, Metro held consecutive stakeholder engagement campaigns to ensure the corridor communities had ample opportunity to become informed, engaged and prepared for the release of the Recirculated Draft EIR. As part of these efforts, the project team conducted three rounds of community meetings (November 2021, March 2022, June 2022), a robust notification campaign and public hearings during the 60-day Draft EIR review period (June 30 to August 29, 2022), targeted stakeholder meetings to address specific concerns (e.g., East Los Angeles business), CBO Roundtable meetings, event booths and pop-up information tables, and other focused outreach.

For more information on public outreach efforts during the Recirculated Draft EIR public review period, including the banners that were displayed, see Response to Comment I-161-3.

### Comment I-162-6

This is a 3 billion project, Metro should invest that money in the purchasing of electrical buses which is the future, the replacing gas vehicles with electric ones, not extending metro gold line and taking valuable space and eliminating lanes for our vehicles.

### Response to I-162-6

See Response to Comment I-9-2 regarding the project cost and Response to Comment CO-4-15 regarding the range of alternatives considered.

## I-163: Kevin Chu

### Comment I-163-1

Hello. Thank you for considering to extend your railroad network. I know that Metro has already decided to go south after Atlantic Station. I am just wondering if the SR60 Alternative has a chance to come back to live. Since "The shop at Montebello" is right next to SR60, it would definitely be a good station for residents from the west side to shop here. South El Monte is also another great place to set a station since El Monte has Metrolink and El Monte Metro bus station. City of El monte can definitely provide connections within this 3 places using their city bus lines. More people are living east of I605 along SR60 such as Rowland Height and Hacienda Height. If the L line is going east along SR60. This could prepare itself to extend to the east side in the future. Thank you so much for your time.

### Response to I-163-1

Regarding the elimination of the SR-60 Alternative, as described in Chapter 5, Comparison of Alternatives, and in more detail in Appendix T of the Recirculated Draft EIR, this alternative was withdrawn due to environmental constraints and other considerations in addition to public opposition during the scoping period. See also Response to Comment CO-4-15 regarding the range of alternatives that have been considered and withdrawn from further evaluation.

## I-164: Patty

### Comment I-164-1

I have submitted many comments before. I still feel this project is wrong for Washington Blvd. Too many environmental and traffic concerns. It will only bring problems to Pico Rivera and Whittier.

### Response to I-164-1

The commenter's opposition to Alternatives 1 and 3 is noted. See Response to Comment I-4-3 regarding environmental impacts.

## I-165: Jorge Martinez

### Comment I-165-1

My name is Jorge Martinez from Montebello, 90640, and I'd like to say that Montebello doesn't want this, Pico Rivera doesn't want this Metro, and we're finding out that people in Whittier do not want this either. And why do we get -- what is it? -- backseat treatment when people in North Montebello put up a petition with 400 signatures and we've got over 1300 in South Montebello and Pico Rivera and nothing happened? We've turned it in and absolutely nothing has happened. And with the other situation, the SR-60 was stopped because 400 people signed the petition, and we're not getting equal treatment. That's it. Thank you.

### Response to I-165-1

Regarding the elimination of the SR-60 Alternative, as described in Chapter 5, Comparison of Alternatives, and in more detail in Appendix T of the Recirculated Draft EIR, this alternative was withdrawn due to environmental constraints and other considerations in addition to public opposition during the scoping period.

## I-166: Edmund Veloz

### Comment I-166-1

Hello, my name is Edmund Veloz. I live in South Montebello, and I'm 100 percent against this project. In 2019 there were six scoping meetings. In Pico Rivera there were 16 people against the light rail, 3 in favor. Montebello, 26 against, 8 in favor. Whittier, 10 in favor -- no -- 20 in favor, 10 against. South El Monte, 4 in favor, 4 against. East L.A., 20 against light rail, 4 against. Commerce, 2 in favor -- 2 against and 7 in favor. What we did, we're advocating the TSM alternative, and we've gotten -- now it's close to over 1700 signatures in favor of the TSM alternative and opposing the light rail. We're going to continue with that. It grows -- it's continuing to grow. We have been -- we have submitted this to the Metro people -- thirteen -- 1239 signatures they got, and in Montebello, same thing. So they know. Hilda Solis knows that she's on the wrong side and so does our Montebello city council know. But all other people are going to know. We're not going to stop. I don't know where this man is coming from because he says there's no more TSM alternative. He didn't even mention it, but I know it's there, and that's what we're going to continue with because it's the best one.

### Response to I-166-1

See Response to Comment I-62-1 regarding the TSM Alternative.

### Comment I-166-2

It costs us 1/100th of the value of this piece of crap. Don't let them steal this money from you.

### Response to I-166-2

See Response to Comment I-9-2 regarding the project cost.

## I-167: Francisco Martinez

### Comment I-167-1

Thank you for being here. I gave up the hearings of the Senate congressional on the Trump takeover of American democracy. So this is good. This is a good example of American democracy where we get up and speak our peace. I live in unincorporated East Los Angeles. As a result, I have a very narrow interest, and the narrow interest is we'd like to be treated fairly in the process of this development. We've already had a previous experience with this when it came through Los Angeles, and then it came into unincorporated East Los Angeles. Unincorporated East Los Angeles, we got ripped apart.

### Response to I-167-1

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment I-167-2

Boyle Heights, they got treated nice. It went underground, did not disrupt anything on the surface. Got into unincorporated East Los Angeles and we got ripped up on Fourth Avenue. Destroyed the sense of community in that area. Now I'm not against progress, and I favor all advancements in transportation. And in particular, with regards to coming through unincorporated East Los Angeles, Atlantic into the City of Commerce, go underground not on the surface.

### Response to I-167-2

As described in Chapter 2, Project Description, the guideway would begin at the eastern end of the existing East Los Angeles Civic Center Station, transitioning from at-grade to underground at the intersection of South La Verne Avenue and East 3rd Street. The guideway would daylight from an underground configuration after crossing Saybrook Avenue east of the proposed Commerce station.

## I-168: Blanca Chavez

### Comment I-168-1

One must know the schedule of the bus because we want to know when what bus comes and another one comes. So it's important to have a schedule. Yeah, they take a long time from one bus to another; so we need to know that. Yeah, there's also the bus stop there, and they just take a long time there at the bus top, and also the passengers are losing time as well. So we also want them to train the bus drivers so that, when the bus is really full, that he would be kind enough to just people to move on down so that everybody can be seated or be orderly in the bus.

### Response to I-168-1

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment I-168-2

Thank you very much. Thank you very much for this meeting. I think it's very helpful. I got the flyer at home, and I congratulate you for this.

### Response to I-168-2

The commenter's support for the Project is noted.

## I-169: Denise Hagopian

### Comment I-169-1

Denise Hagopian, Montebello, 90640. I have a couple of comments. I don't feel that the businesses that are on Washington have been notified properly or at all.

### Response to I-169-1

See Responses to Comment I-161-3 and I-162-5 regarding public outreach that has been conducted for the Project.

### Comment I-169-2

I feel that Washington Boulevard doesn't have buses now which to me means that residents aren't using that route to go Downtown L.A.

### Response to I-169-2

Montebello Bus Line Route 50 operates along Washington Boulevard throughout the Detailed Study Area, but this line only operates within the City of Montebello and therefore does not connect directly with Downtown Los Angeles.

### Comment I-169-3

Montebello is being used as a thoroughfare. So our businesses will be put out of business. The property values will be degraded.

### Response to I-169-3

Regarding concern for small businesses, see Response to Comment A-8-21, Response to Comment B-2-8, and Response to Comment B-2-9.

### Comment I-169-4

The noise and the pollution level will be increased. And I don't know if you were listening to the trains as they were going by and the cars, but I could hear them from here.

### Response to I-169-4

Section 3.2, Air Quality, of the Recirculated Draft EIR provides analysis regarding potential air quality impacts associated with the Project. As described in Section 3.2.6.2, operation of the Project would reduce VMT and thereby result in a decrease in most regional criteria air pollutants and impacts are less than significant. Section 3.11, Noise and Vibration, of the Recirculated Draft EIR provides analysis regarding potential noise impacts associated with the Project. As described therein, with implementation of mitigation, noise impacts would be less than significant.

### Comment I-169-5

So I think that we have a lot of noise and pollution mitigations and property owners to discuss where they stand so that they don't lose their investment but especially all the businesses.

### Response to I-169-5

See Response to Comment I-169-4. Air quality impacts are less than significant and no mitigation is required. Mitigation measures to reduce noise impacts to less than signification is identified in Section 3.11.7 of the Recirculated Draft EIR.

### Comment I-169-6

With lessened truck traffic, all those truck service stations, truck car washes, maintenance men, their whole lives were invested in their business, and they'll now be out of business. And they

already proved on Third Street that they didn't take care of the business owners because those business owners went bankrupt. Thank you.

### Response to I-169-6

The commenter's opposition to the Project is noted. Regarding concern for local businesses, see Response to Comment A-8-21 and Response to Comment B-2-9.

## I-170: Esther Celiz

### Comment I-170-1

I have shared other concerns, Pico Rivera, Washington and Passons where more then 3,000 children will be crossing that intersection Monday three Friday mornings and afternoon, students from Rivera Middle School and from El Ramncho High School.

### Response to I-170-1

The comment is understood to be asserting that more than 3,000 students would be crossing at the intersection of Washington Boulevard and Passons Boulevard in Pico Rivera twice a day to get to and from Rivera Middle School and El Rancho High School. These schools are located approximately 0.25 mile from the intersection (El Rancho High School to the north and Rivera Middle School to the south) and have a combined student population of approximately 3,000. Therefore, the commenter is asserting that the total student population of these two schools would cross the street at Washington Boulevard and Passons Boulevard. While it is expected that some students would cross at this street intersection, many students would use other routes including those that do not require crossing Washington Boulevard and different modes of transportation such as school buses, and personal vehicles. Thus, the number of students using that intersection would be much lower. Therefore, it is not reasonable to assume that all students from the two schools would be crossing the street intersection twice daily. Regarding safety at the Washington Boulevard and Passons Boulevard intersection, see Response to Comment I-55-2 and I-128-3.

### Comment I-170-2

Mornings will be impacted so much with the rail train, our community will be on a grid lock, emergency vehicles will be at a very big disadvantage trying to get thru. Please reconsider the train ending at Commerce at Citadel please do not come any further.

### Response to I-170-2

The commenter's opposition to Alternative 1 and Alternative 3 is noted. See Response to Comment I-21-1 regarding traffic congestion. See Response to Comment I-36-1 regarding emergency vehicle delays.

### Comment I-170-3

PIH is also a great concern, having a station in Lambert will cause so much traffic as it already has with ambulances and emergency vehicles trying to get to Hospitial.

### Response to I-170-3

PIH Health Whittier Hospital, which includes emergency care services, is located on Washington Boulevard near Lambert Road. The intersection of Washington Boulevard and Lambert Road would be preserved as-is because the alignment curves southward approximately one block west of the intersection and does not impact the intersection. The ingress and egress of emergency vehicles to and from the hospital would remain. See also Response to Comment I-36-1 regarding emergency vehicle response time.

## I-171: Catalina Castro

### Comment I-171-1

I am delighted to see this amazing project move along. I think that this is an excellent way of reducing vehicle smog, and moving into the future more efficiently.

### Response to I-171-1

The commenter's support for the Project is noted.

### Comment I-171-2

Here are my concerns: 1. Security on platforms and in general. I don't think that "ambassadors" are adequate..

### Response to I-171-2

See Response to A-8-19 regarding security features at Metro stations and platforms, in addition to the ambassador program.

### Comment I-171-3

2. Senior citizen mobility assistance.

3. Long time residents will always be a problem because they want more and pay less.

### Response to I-171-3

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment I-171-4

4. Not enough Rest Areas along path. Might encounter homeless issues.

5. Elderly are not (usually) computer savvy. Availability of tickets/passes at brick and mortar locations.

6. Advertisement on trains given to local businesses so they can "shut up" sorry!

7. toilet/restroom facility on train.

### Response to I-171-4

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

## I-172: Maria Garcia

### Comment I-172-1

The project is completely unnecessary. Metro's own study and numbers prove it will be one of the most expensive lines for the smallest gain.

### Response to I-172-1

Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5.

### Comment I-172-2

There is no network analysis showing how this line performs relative to other projects in the same area or alternatives that cost less than $6.5 billion for more than 11,000 riders.

### Response to I-172-2

A network analysis is outside of the scope of the Recirculated Draft EIR. See Response to Comment I-9-2 regarding project cost. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

## I-173: David Reynoso

### Comment I-173-1

I wanted to express my comments against the extension of the gold line in my city of Pico Rivere. This train extension will negatively impact Pico Rivera in the following ways, first of all, the street Washington is already a heavy transional traffic street that people use to commute to nearby businesses, its highly populated community, traffic will increase due to eliminating lanes to accomodate the train an issue that is evident on your above grade train station located at 3rd street in LA.

### Response to I-173-1

The commenter's opposition to the Project is noted. Regarding the changes to travel lanes, see Response to Comment I-43-1 and Response to Comment I-190-3. Regarding traffic congestion, see Response to Comment I-21-1.

### Comment I-173-2

Second, parking issues, commuters will park nearby to ride the train which will impact our residents, metro has stated that they don't plan to build parking because commuters will ride their bikes or walk to stations which is not true, does Metro see people riding bikes at 4 in the morning when people are commuting to work?.

### Response to I-173-2

Pursuant to SB 743, adequacy of parking is not a significant impact under CEQA (see Pub. Resources Code, § 21099(b)(3). As described in Section 2.5.1.2 of Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the Atlantic/Pomona station (relocated/reconfigured), and surface parking would be provided at each of the at-grade stations.

### Comment I-173-3

Third, increase crime at stations, fights and drug use. These problems are evident on your above grade train located on 3rd street, this is why commuters don't ride your trains.

### Response to I-173-3

See Responses to Comments I-7-3 and A-8-19 regarding public safety.

### Comment I-173-4

Lastly, increased homeless population. The train located on 3rd street in LA already displays issues with the homeless population. If this train is extended, homeless people will now commute to other nearby cities. Metro spoke about mitigation programs to compate the homeless and unsheltered individuals but the reality is that the train stations attract homelessness and crime in order to mitigate that is not to build the extension. Metro also stated that the homeless population is a state issue but i disagree its a city of LA issue, the city is now plagued by homelessness, rampant drug use and crime.

### Response to I-173-4

See Responses to Comments A-8-19 and I-7-3 regarding crime, security, and people experiencing homelessness.

### Comment I-173-5

The residents Pico Rivera do not want our city to be similar to LA. Why does metro think we need a train in our city? Do metro employees commute to work in trains? For those that do not, i urge you to ride the 3rd street metro line and see firsthand what you are creating.

### Response to I-173-5

The commenter's opposition to the Project is noted. See Response to Comment I-10-5 regarding the project need.

### Comment I-173-6

I begin to question the reason why Metro wants to extend the gold line when the residents don't want it, is to increase your profits due to a 30% rideshare decrease over the years?

### Response to I-173-6

See Response to Comment I-10-5 regarding the project need.

### Comment I-173-7

Metro needs to look at the statistics and determine that rideshare has decreased. So why build another train? People have spoken with their pockets and stopped riding your trains for the reasons mentioned above.

### Response to I-173-7

See Response to Comment I-10-5 regarding the project need.

### Comment I-173-8

Another comment is that metro did a bad job in outreach, I didn't not see any signs around my city regarding community meetings, since this will severely impact my city and residents, no street banners, no posters adjacent to rail construction sites or neighborhoods, Metro did the bare minimal in outreach, i received one postcard via mail, thats it.

### Response to I-173-8

See Responses to Comment I-161-3 and I-162-5 regarding public outreach that has been conducted for the Project.

### Comment I-173-9

This is a 3 billion project, Metro should invest that money in the purchasing of electrical buses which is the future, the replacing gas vehicles with electric ones, not extending metro gold line and taking valuable space and eliminating lanes for our vehicles.

### Response to I-173-9

See Response to Comment I-9-2 regarding the project cost and Response to Comment CO-4-15 regarding the range of alternatives considered.

## I-174: Michael Hlebovy

### Comment I-174-1

Please build the Eastside gold line as far as you can. I voted for additional taxes for Metro on every ballot, but the Whittier area has gotten nothing to show for it. Build me something before I die of old age.

### Response to I-174-1

The commenter's support for the Project is noted.

## I-175: Campbell Sadeghy

### Comment I-175-1

Please add as many grade separations as possible.

Ensure the tracks can handle 6 car trains.

Plan for an integration of a possible future CA-60 alignment when Caltrans widens that freeway.

### Response to I-175-1

Grade separations are evaluated based on Metro's Grade Crossing Safety Policy. As stated in Section 3.14.6.3.1 of the Recirculated Draft EIR, an initial screening (Milestone 1) analysis according to Metro's Grade Crossing Policy indicates that all proposed grade crossings under Alternative 1 would fall under the least restrictive category "At Grade Operation Should Be Feasible," with the exception of the crossing at the Lambert Road terminal approach. At this location, the alignment would be at-grade and cross eastbound traffic on Washington Boulevard to access the station platform. The initial screening shows that this location would fall under the "Possible At Grade Operation" category. This grade crossing, like the others proposed elsewhere on the line, would be designed according to applicable MRDC and standards and would include traffic signal coordination and upgrades to avoid conflicts between LRVs and eastbound traffic along Washington Boulevard.

Three car trains will be used for this project to be consistent with other Metro LRT stations and Metro Rail Design Criteria.

The proposed LRT alignments will immediately turn south from the current terminus of the Metro E Line (formerly Metro L [Gold] Line) and would not cross or impact the SR-60 freeway.

## I-176: Alfredo Acosta

### Comment I-176-1

While I live in Pomona I frequently find my self going to Pico Rivera to visit family it takes 2 hours to go on bus so this would shorten my trip time enabling me to get home early with the Blue Line to Pomona it will be much easier

### Response to I-176-1

The commenter's support for the Project is noted.

## I-177: Jasmine Torres

### Comment I-177-1

While the extension Eastward towards Whittier I'm sure is helpful, having a rail system running through a still relatively small neighborhood like Santa Fe Springs would be devastating to traffic, especially with a train system already close to Whittier (Los Nietos Road) that impacts traffic enough, that doesn't include the no doubt longer than 4 year minimum construction to make this possible. Should the Gold Line be extended towards Whittier, once passengers arrive to the Greenwood station, a bus system should be implemented not rails to help minimize the chaos that would descend on the area from a Metro rail system.

### Response to I-177-1

See Response to Comment I-21-1 regarding traffic. See Response to Comment CO-4-15 regarding the range of alternatives considered, including bus alternatives.

## I-178: James Prado

### Comment I-178-1

I was raised in Pico Rivera and own our home near the proposed location. I don't agree with this extension . Many of our residents are home owners to middle and low income but majority of all have vehicles . We are not relying on public transportation to get around , the buses that are in route are seldom full.

### Response to I-178-1

The commenter's opposition to the Project is noted.

### Comment I-178-2

There is a lot of children that cross Washington Blvd. from the Jr.High & High schools daily for school and functions throughout the year. During every sport season the teams run through the neighborhood & Washington Blvd while training not to mention the family's that walk from homes to the neighborhood parks and city hall functions. This will be very disrupting and dangerous for all of them . One fatal accident is one too many to except . Consider the overpass just minutes away that was installed on Passons to help avoid any more deaths the family's had to experience and the other off of Durfee ave.

### Response to I-178-2

See Response to Comment I-36-3 regarding pedestrian safety in general and Response to Comment I-55-2 regarding safety at the Washington Boulevard and Passons Boulevard intersection. See Response to Comment I-160-1 regarding the train bridge at Durfee Avenue.

### Comment I-178-3

Why would we fail and take steps backwards ? Pico Rivera or West Whittier doesn't need this train. This in not areas with multiple housing units or apartments.

### Response to I-178-3

See Response to Comment I-10-5 regarding project need.

### Comment I-178-4

If any of the options to consider would be the second ending up at Citadel and traveling through Atlantic shopping area. Downey, La Mirada , East Whittier , or Fullerton wouldn't allow you to invade their family environment, then why take advantage of our neighborhood?

### Response to I-178-4

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

### Comment I-178-5

The traffic congestion through our city will largely increase as well as the noise and pollute the landscape. It is very critical that I influence you not to enter Pico Rivera . I appreciate the opportunity to acknowledge our families community and safe haven we've been trying for decades to improve .

### Response to I-178-5

See Response to Comment I-21-1 regarding congestion. Section 3.2, Air Quality, of the Recirculated Draft EIR provides analysis regarding potential air quality impacts and Section 3.11, Noise and Vibration, of the Recirculated Draft EIR provides analysis regarding potential noise impacts. As described therein, air quality impacts would be less than significant, and noise impacts would be less than significant with implementation of mitigation.

### Comment I-178-6

Please consider option 2 and I'll be looking forward to sharing this information to all our neighbors , family & city members.

### Response to I-178-6

The commenter's support for Alternative 2 is noted.

### Comment I-178-7

I will like to know which city officials are in favor of this extension and will look forward to any petition or act in voting to deny this proposed completion. Thank You

### Response to I-178-7

The commenter's opposition to the Project is noted.

## I-179: Matt Diaz

### Comment I-179-1

The Greenwood option colored green on the map, is a great option. I can just imagine the areas between and Citadel mall and Greenwood being rezoned to provide thousands of units of Homes and becoming a transit oriented community.

### Response to I-179-1

The commenter's support for Alternative 3 is noted. It should be noted that there is no zone change or new housing proposed as part of the Project.

### Comment I-179-2

A subway stop on the established and active community along Whittier blvd would also be a benefit to the whole city. A second phase further to Whittier City would be best if funds aren't available.

### Response to I-179-2

The commenter suggests that a station should be located on Whittier Boulevard in the city of Whittier. As discussed in Recirculated Draft EIR Appendix T, Alternatives Withdrawn from Further Evaluation, the evaluation and screening of concepts, engineering and environmental refinements, and decisions to withdraw alternatives from consideration has a long history in the development of the Project including withdrawn alternatives on Whittier Boulevard. For additional information, see Response to Comment I-1-4.

## I-180: Grady Yu

### Comment I-180-1

The storymap of the Eastside Transit Corridor depicts a design option for Atlantic/Pomona Station that appears to limit pedestrian access to the station. The Atlantic/Pomona Station: Open Underground Option appears to have an entrance on only one side of Atlantic Blvd. This station should be designed to allow for a station entrance to be built on the other side of Atlantic Blvd if funding becomes available.

The Atlantic/Pomona Station: Open Underground Option appears to have been designed with more entrances than the other option. Metro should consider how this station connects to the intersection at Beverly Blvd and Atlantic Blvd.

### Response to I-180-1

The Atlantic/Pomona station option would have the platform and entrance located west of Atlantic Boulevard, with easy at-grade access across Atlantic to the station. The proposed design follows standard design requirements. A connection from the east side of Atlantic Boulevard would involve a grade-separated pedestrian crossing, which would potentially introduce additional impacts on the east of (and along) Atlantic Boulevard.

## I-181: Anonymous

### Comment I-181-1

My concern with the extension of the gold line to pass through Pico Rivera is the access that is being given to homeless to come into our City.

### Response to I-181-1

See Response to Comment A-8-19 regarding security and people experiencing homelessness.

### Comment I-181-2

Not only that the look of a rail coming through is not appealing to our City. I don't see how this extension is going to benefit the City and am against this project.

### Response to I-181-2

The commenter's opposition to the Project is noted. Impacts to the existing visual character and quality of public views and its surroundings are discussed in Section 3.1.6.3, Aesthetics, of the Recirculated Draft EIR. As discussed therein, the Project would be visually incompatible with the existing urban and transportation-oriented visual aesthetic of Washington Boulevard. Therefore, the Project is not anticipated to substantially degrade the existing visual character and quality of the immediate areas. See Response to Comment I-10-5 regarding project need.

## I-182: Brayden Yoder

### Comment I-182-1

I believe it is very important to continue Metro's expansion in all directions, as service of public transit always drives demand. Phase 2 of the Eastside Transit Corridor is a worthwhile project that will help to further integrate our city and provide needed relief from LA's crushing traffic.

### Response to I-182-1

The commenter's support for the Project is noted.

### Comment I-182-2

Please push forward with this project all the way to Lambert. I understand that costs for aerial stations and underground subway lines are more expensive than at-grade, but you can't put a price on convenience of travel and avoidance of vehicle traffic.

### Response to I-182-2

The commenter's support for Alternative 1 is noted.

### Comment I-182-3

As always, the costs of building such light rails systems need to be weighed not against current taxpayer dollars but rather against future generations, who will look back and wonder why we didn't build when we had the chance. The cost of doing nothing is far more prohibitive than the costs that would be incurred now.

### Response to I-182-3

The commenter's support for the Project is noted. Regarding the project cost, see Response to Comment I-9-2.

## I-183: Jamie Shepherd

### Comment I-183-1

The line should terminate either at Whittier College or the Whittier Courthouse.

### Response to I-183-1

The commenter is referred to Table 1-1 of Appendix T, Alternatives Withdrawn from Further Evaluation, of the Draft Recirculated EIR. Table 1-1 Concepts and Alternatives Withdrawn identifies other alternatives considered and key reasons why they were eliminated. See also Response to Comment CO-4-15.

## I-184: Paul Hennessy

### Comment I-184-1

Fully support building as fast as possible and don't think this would pose any environmental risk. We must build this train as far east as possible to help with the sprawl.

### Response to I-184-1

The commenter's support for the Project is noted. The commenter is referred to Table ES-2 in the Executive Summary of the Recirculated Draft EIR. This table provides a summary of impact evaluations for all resource topics considered in the Recirculated Draft EIR, including required mitigation measures for potentially significant impacts.

### Comment I-184-2

Please also upgrade trains and buses with equipment to fight Covid and airborne viruses. Improved ventilation and far UV lights will help with public health and trust of returning to public transit

### Response to I-184-2

The health and safety of transit riders and operators are Metro's top priority. Metro continues to follow the orders and recommendations from the L.A. County Department of Public Health and the Center for Disease Control (CDC). Metro has installed transparent protective barriers that separate operators from passengers and the use of rear-door boarding to help ensure social distancing. Metro also installed mask dispensers and hand sanitizers on buses and systemwide to help protect the health of its riders. Metro's COVID-19 Recovery Task Force released their final report, "A Path Forward," which is accessible online at https://www.metro.net/about/plans/recovery-task-force. Metro is exploring options to improve air flow and air filtering on transit vehicles and in stations.

## I-185: Leticia Gordo

### Comment I-185-1

g) 1) There is no overhead sample of the Washington as San Gabriel River North. The sample present in the EIR only shows the side of the bridge so it is difficult to understand how much the bridge will be widen and its impact on the residents to the southeast of Washington Blvd. Because the bridge will have to be widen, it appears it will impact the residents to the southeast of Washington Blvd.

### Response to I-185-1

As discussed in Section 3.3.1.2.1 of Appendix P, Construction Impacts, of this Recirculated Draft EIR, the San Gabriel River bridge replacement would be wider than the existing bridge by approximately 16 feet on both sides. Figure 3.7 of Appendix P, Construction Impacts, of this Recirculated Draft EIR illustrates a cross section of Alternative 1 over San Gabriel River- Bridge Replacement. Additionally, Volume 2, Advanced Conceptual Design, of this Recirculated Draft EIR illustrates the proposed section of the San Gabriel River Bridge in drawing number TX-W-118 and the proposed roadway plan at the San Gabriel River in drawing number CS-W-130. The proposed bridge widening would occur over the river channel and would not encroach on residential properties.

### Comment I-185-2

2) The document does not clearly present the impact to the smaller streets. It appears that those drivers trying to get onto Washington Blvd from one of the small streets only option will be to turn right. For example, Washington Blvd at Millux and Hasty Avenues. Driver exiting these two Avenues can only turn right thereby having to drive to Passons Blvd or Pioneer Blvd, respectively.

### Response to I-185-2

The commenter is correct that new controls would be implemented at unsignalized crossings using best practice safety measures (e.g., curbs and fencing to prevent uncontrolled left-turns). However, it should be noted that left turns are already limited. For example, the comment suggests the Project would prevent vehicles from turning left onto Washington Boulevard from Millux Avenue; however, this is incorrect because an existing median already prevents vehicles from turning left onto Washington Boulevard. As explained in Section 3.14.6.1, Transportation and Traffic, of the Recirculated Draft EIR, Alternative 1 would result in several changes to traffic circulation including access changes at selected cross streets due to LRT at-grade or aerial crossings, including prohibition of left-turn ingress/egress or through access. These changes would be designed according to applicable standards and criteria (as discussed under Impact TRA-3), would provide for adequate emergency access (as discussed under Impact TRA-4), and would not result in a substantial or measurable increase in VMT (as discussed under Impact TRA-2).

### Comment I-185-3

3) Document is inaccurate regarding Ferguson Drive. Ferguson Drive is only a 4 lanes up to Gerhart Avenue. Heading east after Gerhart Avenue, Ferguson becomes a 2 lanes. Having worked at one of the County Office's on Ferguson, my observation is that the Ferguson Drive does get a lot of through traffic and there is often delays resulting from the trucks entering and exiting the warehouses between Gerhart Avenue and Garfield Avenue.

### Response to I-185-3

The third sentence of the second paragraph under the heading Landscape Unit 2 - Smithway Street, Commerce of the Recirculated Draft EIR Section 3.1.5.4.2 (page 3.1-10) has been revised to reflect the following correction, which is shown in strike-through (deleted) and underlined italicized (new text).

Ferguson Boulevard is a four-lane collector roadway that runs east to west with two lanes of traffic in both directions and a sidewalk on the south side of the roadway *to the west of Gerhart Avenue*.

The same edit was made to Section 6.2.2 (page 36) of Appendix B of the Recirculated Draft EIR.

### Comment I-185-4

4) There is concern for the safety of the children of Greenwood Elementary School who live between Greenwood Avenue and Bluff Road, southeast of Washington Blvd. This area is a heavily populated residential area with low income families. It does not appear report or train route have given much review to the impact to these families and is more heavily concerned about the benefits to the Citadel Outlet, PIH, and others.

### Response to I-185-4

As discussed in Section 3.13.6.1, Public Services and Recreation, of the Recirculated Draft EIR, operation of the Project would not disrupt facilities or services provided at Greenwood Elementary School, no physical alternations would be required, and access would be maintained. The LRT station and crossings would be designed in accordance with Metro Rail Design Criteria (MRDC), including Fire/Life Safety Criteria, to ensure safety and minimize potential hazards at all locations. The Project would limit pedestrian crossings with a barrier along the median of Washington Boulevard, except at controlled intersections. The Project would integrate measures to maximize

safety for the surrounding communities. As discussed in Section 3.14.6.1, Transportation and Traffic, of the Recirculated Draft EIR and as identified in PM TRA-1, unsignalized left turns and pedestrian crossings will be controlled using best practice safety measures (e.g., curbs and fencing to prevent uncontrolled left-turns, high visibility curbs between roadway and guideway, mid-block crosswalks, signal-protected pedestrian movements, channelization, barriers to protect and route pedestrians, ADA-compliant curb ramps, and warning signs).

Residents in East Los Angeles face mobility challenges, including a high population and constrained transportation network. The Project is designed to benefit both the region and the local communities by enhancing mobility and connectivity. As outlined in Section 2.2 of the Recirculated Draft EIR, the objectives of the Project include providing mobility options to increase accessibility and convenience to and from Los Angeles County, improving accessibility and connectivity to transit dependent communities, and enabling jurisdictions in eastern Los Angeles County to address their transit-oriented community goals and providing equitable development opportunities. See also Response to Comment I-161-10 regarding consistency of the CEQA analysis with the 2012 California Attorney General Environmental Justice Fact Sheet.

## Comment I-185-5

5) The report indicates that the trees on Washington Blvd at Rio Hondo Spreading Grounds are an obstruction to the San Gabriel Mountains and Puente Hills to the east. This is inaccurate. The Mountains and Hills are visible heading east on Washington Blvd at Bluff Road. On a clear day, their site is beautiful especially when there is snow or at night during the Holiday seasons. We are currently encountering climate issues and yet these trees will be removed for this proposed transit. These trees have been here for many years and have provided calmness/serenity and shade for the drivers.

## Response to I-185-5

As described in Section 3.1.5.4.4, Aesthetics, of the Recirculated Draft EIR, the lines of trees along the center median of Washington Boulevard at Rio Hondo Spreading Grounds obscure but do not obstruct views of the San Gabriel Mountains to the north and Puente Hills to the east. The visual obscurity is partial, depending on location, weather and seasonal conditions, and time of the day. As discussed in Section 3.1.6.3.1, these trees would be removed to accommodate the placement of the proposed at-grade LRT guideway infrastructure, thus reducing the visual connectivity and changing the visual character of this segment of Washington Boulevard. However, as shown in Figure 3.1.29 on page 3.1.37 of the Recirculated Draft EIR, no new visible feature would be visually incompatible with the existing urban and transportation-oriented visual aesthetic of Washington Boulevard or substantially detract from the Rio Hondo and Rio Hondo Spreading Grounds, which are the primary focal point of this area. Therefore, the Project would alter, but not substantially degrade, the visual character and quality of its surroundings. See also Section 3.3.6.4.1 of the Recirculated Draft EIR. As stated therein, the Project would minimize tree removal if possible and any removal would occur in compliance with local tree protection policies or ordinances, including requirements for tree replacements. In addition, subsequent to publication of the Recirculated Draft EIR, Metro adopted the LA Metro Tree Policy, which addresses street tree removals and requires tree replacement (see Response to Comment A-3-6 and revisions to Final EIR).

## Comment I-185-6

6) The City of Pico Rivera had underpasses built at Durfee Road and Passons at Slauson to mitigate traffic delays and separate vehicles and pedestrians from trains. There were pedestrians killed at some of these crossings. In order to provide safer routes for pedestrians, mitigate traffic,

and eliminate the need for trains to blow their horns. These two projects cost millions which were paid for by state and federal funds. However, now the County and Metro want to build a light rail in Pico Rivera on Washington Blvd which appears to contradict the City of Pico Rivera efforts to mitigate traffic delays and provide safer routes for pedestrians.

### Response to I-185-6

As identified in PM TRA-1 in Section 3.14, Transportation and Traffic, of the Recirculated Draft EIR, left turns and pedestrian crossings at unsignalized crossings will be controlled using best practice safety measures (e.g., curbs and fencing to prevent uncontrolled left-turns, high visibility curbs between roadway and guideway, mid-block crosswalks, signal-protected pedestrian movements, channelization, barriers to protect and route pedestrians, ADA-compliant curb ramps, and warning signs). Left-turning traffic at signalized intersections would be maintained, and pedestrian access would be maintained via crosswalks. Further, delays resulting from LRT at-grade operations would be brief due to the short length of the LRT trainsets and the short time required for LRT vehicles to enter and exit the crossings. Given that trains would be operating in exclusive street-running ROW at these locations, it would be possible for trains to clear signaled and unsignalized intersections quickly.

### Comment I-185-7

7) This light rail route will create more traffic for the already heavy traffic related to El Rancho High School north of Washington and then south of Washington are Rivera Middle School and Rivera Elementary School. My observation when traveling Passons during school start and ending times is that traffic on the south of Washington gets backed up to Bert Street, which is approximately 1/4 of a mile. It appears that the light rail will create more traffic and delays on Passons. Additionally, drivers will look for alternate streets creating more thru traffic and speeders on residential streets.

### Response to I-185-7

See Response to Comment I-21-1 regarding traffic impacts.

### Comment I-185-8

8) I believe there are better and less costly alternatives to creating this light rail that impacts residents along Atlantic Blvd and Washington Blvd. The demographics of residents along the Atlantic Blvd area of low income, large households, and minimal education if any. This is similar demographics for the residents of Montebello living southeast of Washington Blvd at Greenwood Avenue.

### Response to I-185-8

Regarding project costs, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. As identified in Response to Comment I-10-5, one of the project objectives is to improve accessibility and connectivity to transit-dependent communities. Information about demographics in the project area is provided in Section 3.12, Population and Housing, and Section 3.17, Growth Inducing Impacts, of the Recirculated Draft EIR.

### Comment I-185-9

Some alternatives are: - Create a Bus Rapid Transit similar to what is used in North Hollywood (Chandler). Perhaps routes can be built partially next to existing trains such as the Montebello station or the train route near Slauson. The BRT route can be partially near existing train routes

and the other parts on streets such as Washington and Atlantic. - Somewhat like a Shuttle Service. Use more bus service (maybe double buses) that leave Atlantic Station and go to Citadel.

### Response to I-185-9

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered, including BRT.

### Comment I-185-10

Use some of existing spaces in parking structures specific for these riders or build a new parking structure at the corner of Washington and Telegraph. Can also more service from Citadel to Washington Blvd at Whittier Blvd. A parking structure can be built at the lot on the northwest corner.

### Response to I-185-10

Pursuant to SB 743, adequacy of parking is not a significant impact under CEQA (see Pub. Resources Code, § 21099(b)(3)). As described in Section 2.5.1.2 of Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the Atlantic/Pomona station (relocated/reconfigured), and surface parking would be provided at each of the at-grade stations.

### Comment I-185-11

The County currently has shuttle service for Hollywood Bowl, which seats approximately 18,000 people. The shuttle service is provided for various areas of the County for Hollywood Bowl attendees and is used to mitigate traffic delays. The County has taken steps to encourage people to attend the Hollywood Bowl using shuttle service and the County can take steps to create a similar solution for the east side.

### Response to I-185-11

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

### Comment I-185-12

My understanding is that Transportation System Management (TSM) has an alternative, electric buses. It appears this is much less costly and would take much less time to start than the light rail. Also, electric buses are much quieter and are safe for the environment.

### Response to I-185-12

See Response to Comment I-62-1 regarding the TSM Alternative.

### Comment I-185-13

There would be no need to remove existing medians that have plants and trees, no need to tear the street, and no need to take years building a light rail system that will be costly.

In summary, it does not appear that much thought was given on the impact to the demographics, the safety of children going to school, and impacts to tree removal.

I am truly surprised that the County is willing to remove trees when we need them most. I am also surprised that the safety of the school children was not considered.

### Response to I-185-13

The commenter's opposition to the Project is noted. As discussed in Section 3.12, Population and Housing, of the Recirculated Draft EIR, the Project would not result in substantial changes to the existing population or include development of new housing or businesses that would directly induce population growth. See Response to Comment I-36-3 which address safety concerns related to grade crossings near schools. Regarding tree removal, see Response to Comment A-3-6 and Section 3.3, Biological Resources, of the Recirculated Draft EIR, as revised in this Final EIR. See Response to Comment I-62-1 regarding the TSM Alternative.

### Comment I-185-14

In reviewing the report and reviewing the maps, it appears the light rail will create more traffic on the side streets especially during school start and end times.

### Response to I-185-14

See Response to Comment I-21-1 regarding traffic impacts. See Response to Comment I-36-3 regarding pedestrian safety.

## I-186: William Moreno

### Comment I-186-1

I fully support this project without reservations. It will provide new investment in the South part of Montebello.

### Response to I-186-1

The commenter's support for the Project is noted.

## I-187: Larry Batista

### Comment I-187-1

Hello My Comment: Why is another rail line needed if we already have a well-established rail line from Nowalk to downtown Los Angeles, which is approximately 3 miles south of this new proposed line?

### Response to I-187-1

See Response to Comment I-10-5 regarding the project need.

### Comment I-187-2

Is there that much more of a demand to commute by rail lines. From what i see is minimum ridership from rail lines and buses going downtown.

### Response to I-187-2

See Response to Comment I-13-1 regarding ridership. See Response to Comment I-10-5 regarding the project need.

### Comment I-187-3

seems to me that during the construction phase that this will cause a lot of traffic congestion and confusion because of limited area of available traffic lines. Therefore i am against this new proposed Rail line from Whittier to downtown Los Angeles.

### Response to I-187-3

The commenter's opposition to Alternative 1 is noted. See Response to Comment I-47-2 regarding construction traffic.

## I-188: Maria Rivera

### Comment I-188-1

I am AGAINST the expansion of the Metro Light Rail on Washington Blvd to the City of Whittier which would end at Lambert near PIH Hospital.

### Response to I-188-1

The commenter's opposition to Alternative 1 is noted.

### Comment I-188-2

The Metro train is used less and less by people due to the increase violence that takes place while waiting and in the metro rail cars by transients. This would also bring more homeless to our city making it more dangerous for those that live nearby.

### Response to I-188-2

See Responses to Comments A-8-19 and I-7-3 regarding crime, security, and people experiencing homelessness.

### Comment I-188-3

Also by building the metro it would reduce the amount of lanes and cause more grid lock, and would cause emergency vehicles a delay to get to the hospital. It would be more cost efficient to use electric buses and increase bus service to the routes you propose to build the metro rail.

### Response to I-188-3

See Response to Comment I-36-1 regarding emergency vehicle delays. See Response to Comment I-9-2 regarding project costs. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered, including buses.

### Comment I-188-4

Why not put this to vote in a local ballot so that you are aware of what the people actually want? Again, I DON'T want this metro rail to come to Whittier.

### Response to I-188-4

The commenter's opposition to the Alternative 1 is noted.

## I-189: Frank Sanford

### Comment I-189-1

My comments and questions focus on Alternative 1 and the area of Washington Blvd between Norwalk Blvd and Lambert Rd

Demand / Ridership

- Is there sufficient demand for Alternative 1.

- - Montebello Bus line 50 has low ridership and does not run on Sundays. The bus stops between Norwalk and Lambert are often empty.

-- The figures presented show daily ridership for bus line 50. There needs to be more specific breakouts. What is the ridership in the morning, afternoon and evening? Will the Alternative 1 trains be empty after 1pm?

- Section 3.14.6.1.1 says travel time between the Atlantic and Lambert stations would be approximately 22.6 minutes vs auto travel time of 32 minutes. Travel time should be estimated for various times of the day. Auto travel at night via the 60 freeway is usually 20 minutes.

- Is the travel time for other (shorter) routes improved? Rosemead to Lambert?

### Response to I-189-1

As stated in Section 3.14.6.1.1 of the Recirculated Draft EIR, Alternative 1 is forecasted to increase countywide transit travel by approximately 7,700 new transit trips daily compared to the No Project Alternative, and approximately 15,000 total weekday boardings.

As stated in Table 3.14-1 of the Recirculated Draft EIR, the average daily ridership for the Montebello Bus line 50 is 3,811.

Metro's regional travel demand forecasting model, the Corridor Based Model 2018 (CBM18) used to model ridership does not output hourly or time of day for ridership or travel time, but is instead used to model average daily weekday ridership.

Travel time for Alternative 1 is consistent throughout the day.

### Comment I-189-2

Traffic and the elimination of numerous left hand turn options

- Limiting left hand turns to signaled intersections will cause an excessive amount of u-turns and unsafe driving conditions. see attached file -- Drivers may have to drive up to a half mile in the opposite direction and make a u-turn to head back in their desired direction.

-- Eliminating left hand turns will funnel an excessive amount of cars to signaled intersections. -- Eliminating left hand turns will negatively impact large trucks, delivery vehicles, police, fire and ambulances.

- The extension at grade running down the middle of Washington will prevent emergency vehicles from using the opposite direction lanes to quickly reach PIH or other destinations.

- Reducing lanes from three to two will negatively impact emergency vehicles going to nearby PIH.

- Trucks often use multiple lanes when preparing to make wide right hand turns. This will become more dangerous if lanes are reduced from three to two lanes.

## Response to I-189-2

As stated in Section 3.14.6.3.1 of the Recirculated Draft EIR, vehicular and pedestrian crossings across the at-grade segments of the alignment would be limited to intersections controlled by traffic signals. Uncontrolled mid-block vehicular crossings of tracks and mid-block left-turns would not be permitted and would be physically prohibited by a curb between the roadway and at-grade guideway with a fence between the two tracks in the center of the guideway whenever feasible, as identified in PM TRA-1 (Section 3.14.7.1). These changes may result in changes to approach and departure traffic patterns for some properties with existing vehicle access along Washington Boulevard (e.g., for parking lots, loading docks, etc.), but would not preclude access completely. Traffic can be expected to increase slightly at locations where left-turn movements would continue to be allowed as a result of these changes in circulation patterns, and treatments such as additional left-turn storage or signal timing/phasing adjustments would be incorporated to help accommodate these changes, where deemed feasible and appropriate in subsequent detailed design of the project. Therefore, operation of Alternative 1 would result in a less than significant impact.

Regarding emergency vehicle response times at at-grade crossings, see Response to Comment I-36-1. Further, PIH Health Whittier Hospital, which includes emergency care services, is located on Washington Boulevard near Lambert Road. The intersection of Washington Boulevard and Lambert Road would be preserved as-is because the alignment curves southward approximately one block west of the intersection and does not impact the intersection. The ingress and egress of emergency vehicles to and from the hospital would remain. As indicated on page 3.14-40 of the Recirculated Draft EIR, it is anticipated that emergency response times would remain at acceptable levels.

## Comment I-189-3

Safety

- How are attendees (students, teachers, staff, parents) of Pioneer High School with the new aquatic center and Aeolin elementary impacted? - How will pedestrians be impacted? Will they walk long distances to the signaled intersections to cross the street or jump the tracks? - Please clarify how an intersection such as Washington between Allport and Gretna will look. Both streets have un-signaled left hand turn lanes with two other left hand turn lanes into business parks.

## Response to I-189-3

As is common for at-grade LRT in Los Angeles County (including the at-grade portions of the first phase of the Eastside Transit Corridor that opened in 2009), and as set forth in project measure

PM TRA-1 (see Section 3.14.7 in the Recirculated Draft EIR), vehicular and pedestrian crossings across the at-grade segments of the Project alignment would be limited to intersections controlled by traffic signals and signal controlled midblock crossings for pedestrians. Vehicular and pedestrian crossings of tracks and left-turns at uncontrolled intersections and mid-block crossings along Washington Boulevard, including Allport Avenue and Gretna Avenue, would not be permitted; they would be physically prohibited by a curb between the roadway and at-grade guideway with a fence between the two tracks in the center of the guideway wherever feasible, as set forth in PM TRA-1. Vehicles would only be allowed to turn right from Allport Avenue and Gretna Avenue on to Washington Boulevard and no pedestrian crossing of Washington Boulevard would be permitted at those intersections. The closest existing signalized intersections with signal protected crosswalks to Aeolin Elementary School on Washington Boulevard are Broadway Avenue and Sorensen Avenue. This would continue to be the case under the Project as pedestrian crossings, left turns, and through traffic would continue to be allowed at Broadway Avenue and Sorensen Avenue. See drawings TS-W-135, TS-W-136, and TS-W-137 of Volume 2, Advanced Conceptual Design, of the Recirculated Draft EIR for the signing and striping plan at these intersections, and drawings TR-W-128 and T-W-129 for the traffic signal plan.

Pioneer High School is located south of Washington Boulevard between Pioneer Boulevard and Millergrove Drive, and the Greater Whittier Aquatic Center is located at the southeast corner of Washington Boulevard and Pioneer Boulevard. Pioneer Boulevard would continue to have signal protected pedestrian crosswalks at Washington Boulevard on both sides and would continue to allow the same traffic movement (through traffic, left turns, and right turns). Millergrove Drive would continue to have one signal protected crosswalk for crossing Washington Boulevard on the western side of the street. However, at that location, vehicles would only be allowed to turn right onto Washington Boulevard. See drawings TS-W-132 and TS-W133 of Volume 2, Advanced Conceptual Design, of the Recirculated Draft EIR for the signing and striping plan at these intersections, and drawings TR-W-124 and T-W-125 for the traffic signal plan.

For additional information on pedestrian safety, see Response to Comment I-36-3.

### Comment I-189-4

Other - Washington Blvd floods after rain near Calobar and various areas in Pico Rivera. Will the extension make this worse?

### Response to I-189-4

As indicated in Section 3.9.6.3.1 of the Recirculated Draft EIR, implementation of Alternative 1 would result in a minimal increase in impervious surface, which would occur within the Rio Hondo Spreading Grounds and San Gabriel River in conjunction with replacement of bridge piers. (See Response to Comment A-11-15 for additional information on this issue.) Operation of Alternative 1 would not substantially change the rate or amount of surface runoff in a manner that would result in flooding on- or off-site and impacts would be less than significant. It should be noted that operation of Alternative 1 would include post-construction Best Management Practices (BMPs) as described in project measure PM HWQ-1 that include designing the Project to reduce impervious surfaces. Such reductions in existing impervious surfaces can help to reduce areas of localized flooding.

### Comment I-189-5

- Growth charts do not accurately portray the un-incorporated Whittier and Los Nietos areas. Including all of Los Angeles county in the count is misleading.

- The cost of this project, especially Alternative 1, is excessive and the money can be better spent elsewhere.

### Response to I-189-5

Appendix N of the Recirculated Draft EIR states the population of East Los Angeles and Los Nietos are not reported individually and are, therefore, encompassed in the data presented for all of Los Angeles County.

The commenter's opposition to the Project is noted. See Response to Comment I-9-2 regarding cost.

### Comment I-189-6

- Improving bus service should be priority.

### Response to I-189-6

See Response to Comment CO-4-15 regarding how the Build Alternatives evaluated in the Recirculated Draft EIR were determined, and alternatives that have been considered.

## I-190: Christopher Lord

### Comment I-190-1

Washington Blvd through the city of Pico Rivera has always been a very congested and challenging area during the morning commute. With the expectation of Phase 3 into Santa Fe Springs, there are many areas of concern for traffic flow:

### Response to I-190-1

See Response to Comment I-21-1 regarding traffic.

### Comment I-190-2

- At-grade Freight Rail 1 block south of Washington Blvd with heavy scheduled and non scheduled impact

### Response to I-190-2

The Project would not affect the existing freight rail operations. See Response to Comment I-21-1 regarding traffic associated with the Project and Response to Comment I-190-3 below.

### Comment I-190-3

- Washington Blvd limiting to only 2 lanes of traffic in each direction will impact vehicle traffic flow east/west of the 605

Please consider creating vehicle overpass or underpass intersections for the At-Grade Freight Rail crossing east of the 605 freeway (Norwalk Blvd and Pioneer Blvd) to help vehicle traffic flow in this area. This area currently gets extreme heavy congestion when freight rail is impacting the morning and evening commute which extends onto Washington Blvd.

### Response to I-190-3

As stated in Section 3.14.6.1.1 of the Recirculated Draft EIR, changes in general-purpose travel lanes would be consistent with local and regional circulation elements and plans. As stated in Section 3.14.6.2.1 of the Recirculated Draft EIR, Alternative 1 would result in reduced VMT by approximately 10,000 compared to the No Project Alternative.

The comment incorrectly states that there are at-grade freight rail crossings at Norwalk Boulevard and Pioneer Boulevard. Grade separations for light rail operations will be evaluated based on Metro's Grade Crossing Safety Policy. As stated in Section 3.14.6.3.1 of the Recirculated Draft EIR, An initial screening (Milestone 1) analysis according to Metro's Grade Crossing Policy indicates that all proposed grade crossings under Alternative 1 would fall under the least restrictive category "At Grade Operation Should Be Feasible", with the exception of the crossing at the Lambert Road terminal approach.

## I-191: Bruce Rochford

### Comment I-191-1

This project should be completed all the way to Whittier. Stop posturing that funds may not be available. The Biden administration has spent $6.82 trillion dollars in 2021.

A hallmark of the Biden administration is the infrastructure bill. At $1.2 trillion, the bill provided cash for a number of improvements, including $312 billion for roads, bridges, public transit, airports, ports, waterways and other transportation-related needs. The American Rescue Plan poured an additional $1.9 trillion into the mix. Many of the funds have never been spent and states are asking to use the monies for other things (i.e., transportation). All this combined with the Inflation Reduction Act means that if you're competent to do your job there should be no excuse about the money. (And, didn't Gov. Newsome say he was going to give So. CA several billion dollars for just such projects!?!)

### Response to I-191-1

The commenter's support for Alternative 1 is noted.

## I-192: Eric Gordillo

### Comment I-192-1

To whom it may concern: I have the following comments for the Alternate 1, at-grade configuration on Washington Boulevard: - "Washington Boulevard experiences higher traffic volumes and land uses with higher rates of trip generation." "Alternative 1 would result in a reduction in general-purpose travel lanes from three lanes to two lanes." Reducing capacity on Washington Boulevard by 33% will have significant traffic delays.

### Response to I-192-1

The comment identifies statements on page 3.13-8 and page 3.14-14 of the Recirculated Draft EIR. See Response to Comment I-21-1 regarding traffic impacts.

### Comment I-192-2

- Businesses will be severely impacted due to significant traffic delays.

- Businesses will be severely impacted due elimination or reduced parking.

### Response to I-192-2

See Response to Comment A-8-21 regarding small businesses. See Response to Comment I-21-1 regarding traffic congestion. See Response to Comment I-185-10 regarding parking.

### Comment I-192-3

- Significant traffic congestion will preclude bus service in the at-grade area.

### Response to I-192-3

See Response to Comment I-21-1 regarding traffic impacts and the reduction in daily VMT due to the Project and Response to Comment I-192-6 regarding transit impacts related to bus operations, which are less than significant even with the lane reduction on Washington Boulevard.

### Comment I-192-4

- The DEIR states that "Washington Boulevard experiences higher traffic volumes and land uses with higher rates of trip generation, which increases the likelihood of delay." The traffic delay is not a "likelihood" it will be a reality. You cannot reduced 33% of capacity and not expect significant traffic delay and congestion.

### Response to I-192-4

The comment mischaracterizes the sentence in reference which is found on page 3.14-39 of the Recirculated Draft EIR. As explained in Section 3.14.6.4 of the Recirculated Draft EIR, delays resulting from LRT operation would be less than delays from high traffic volumes due to the short length of the LRT trainsets and the short time required for LRT vehicles to enter and exit the crossings. Given that trains would be operating in exclusive street-running ROW at these locations, trains would clear signaled and unsignalized intersections more quickly to allow emergency vehicles to pass, as compared to vehicles in the thru-lanes which may not be able to clear the intersection as quickly due to traffic delays. See also Response to Comment I-21-1 regarding traffic impacts.

### Comment I-192-5

- Eliminated ingress/egress for driveways will have a significant adverse impact on the community and businesses.

### Response to I-192-5

As discussed in Section 3.14.6.1, Transportation and Traffic, the Project would result in a reduction in general-purpose travel lanes from three lanes to two lanes, and the elimination of ingress/egress movements at driveways and selected cross streets along Washington Boulevard, which could require some changes to truck ingress/egress for industrial properties in Commerce and Montebello. However, the Project would not preclude vehicle or truck access along Washington Boulevard, and left-turn movements would continue to be allowed to and from major

cross-streets (e.g., Garfield Avenue, Greenwood Avenue) at signalized intersections as identified in PM TRA-1.

### Comment I-192-6

- The DEIR states that "Local bus operating speeds may decrease along Washington Boulevard from east of Garfield Avenue to east of Carob Way due to proposed traffic lane reconfigurations, which would result in reduction of roadway capacity along Alternative 1". This is not an accurate or reasonable expectation. Local bus operating speeds will decrease, adversely affecting the community.

### Response to I-192-6

The Recirculated Draft EIR analyzes worse case future scenarios to understand the potential of impacts associated with the Project. Under future 2042 conditions, other changes to local bus services would likely occur to help maintain bus speeds or reduce traffic in the area (e.g., higher transit demand, alternative modes, rerouted local bus lines or relocated bus stops). Additionally, the Project would not conflict with future transit services but would provide travel time savings benefits and would enhance transit connectivity with the existing local bus network. As such, the Recirculated Draft EIR conclusion that lane reductions may affect travel speeds for local buses would result in less than significant impacts related to transit remains valid.

### Comment I-192-7

The Alternate 1, at-grade segment on Washington Boulevard should be replaced with a Below-Grade configuration. A Below-Grade configuration will adequately mitigate the At-Grade significant adverse impacts.

### Response to I-192-7

The commenter's opposition to an at-grade alignment is noted. See Response to Comment A-10-5 regarding grade separation. Also see Table ES-2 in the Executive Summary of the Recirculated Draft EIR which provides a summary of impact evaluations for all resource topics considered in the Recirculated Draft EIR and see Section 3.14, Transportation and Traffic, of the Recirculated Draft EIR. As identified therein, there are no significant unavoidable impacts relative the at-grade configuration.

## I-193: Mike Martinez

### Comment I-193-1

1. Page 6-17

Section 6.9.2.3 Notification and Project Awareness Efforts

A variety of notification and informational tools were used for outreach to target audiences. Outreach methods included the following:

**Traditional methods**

- Project awareness banners at highly visible locations along the Project corridor

Bullet #5 - Project awareness banners at highly visible locations along the Project corridor.
THIS WAS NOT DONE. SEVERAL OF US TOOK A DRIVE DOWN THE CORRIDOR SEVERAL DIFFERENT TIMES AND BANNERS WERE NOT PUT UP AT ALL.

**Other targeted outreach**

- Electronic signs

Bullet #1 - Electronic signs.
THIS WAS NOT DONE. SEVERAL OF US TOOK A DRIVE DOWN THE CORRIDOR SEVERAL DIFFERENT TIMES AND BANNERS WERE NOT PUT UP AT ALL.

## Response to I-193-1

Section 6.9.2.3 of the Recirculated Draft EIR lists outreach that has been conducted over the course of the Project at various intervals. Banners and electronic signs are one temporary means of public communication but are not continuously displayed. For information on those notification and outreach efforts that have been conducted for the Recirculated Draft EIR, see Response to Comment I-161-3. As identified in Comment I-161-3, banners advertising the availability of the Recirculated Draft EIR for review were displayed from July 15 through August 29, 2022 at Arizona Street and Whittier Boulevard, at the Sheriff Station and Belvedere Park Lake facing South 3rd Street, and along the alignment at Atlantic Avenue Park.

## Comment I-193-2

**2. The EIR should clearly state and outline the impact of lanes throughout each City, East Los Angeles, Montebello, Pico River & Whittier. The EIR needs to have a clear outline for each City similar to Page 3.4-34, Site of the Rio Honda Bridge.**

- Alternative 1 would construct the alignment at-grade in the center of Washington Boulevard and would replace the existing bridge over Rio Hondo to carry both the LRT facility and the **four-lane roadway**. Excavation related to the proposed bridge replacement and the partial property acquisition has the potential to encounter archaeological artifacts associated with the battle. Disturbance of these resources would result in potentially significant impacts as identified under Impact CUL-2.

## Response to I-193-2

Impacts to travel lanes during construction are described in Section 3.14.6.1 of the Recirculated Draft EIR. Implementation of MM TRA-1, as discussed in Section 3.14.7.2 of the Recirculated Draft EIR and revised in the Final EIR, would require the preparation of a Traffic Management Plan that specifies measures to minimize disruption during construction, such as establishing detour routes and coordinating with local business owners.

The commenter correctly reiterates the Recirculated Draft EIR's statement regarding potential impacts under CUL-2 before mitigation measures are applied. However, the commenter failed to note that the Recirculated Draft EIR identifies mitigation measures to address this impact, and that after mitigation, the Recirculated Draft EIR determines the impact to be less than significant.

Section 3.4.6.2.1 of the Recirculated Draft EIR assesses potential impacts under CUL-2; this section states: "MM CUL-7, which requires monitoring during ground disturbance at the Site of the Battle of Rio San Gabriel to ensure that appropriate treatment measures are put in place to protect and

document any resource(s) if encountered, and MM CUL-8, which requires that construction workers receive training on how to proceed if cultural resources are inadvertently discovered and that a Cultural Resources Monitoring and Mitigation Plan (CRMMP) be prepared as identified in Section 3.4.7 of the Recirculated Draft EIR, would be implemented. These mitigation measures would establish protections for unanticipated discoveries of archaeological resources and would reduce impacts to less than significant."

### Comment I-193-3

3. Proposed new extension has only 6 new stations not including the modification to the existing station in East L.A on Atlantic Blvd. and Pomona Blvd. This makes the new extension **VERY INEFFICIENT** for riders and makes absolutely no sense if Metro truly wants the public to have higher rideshare which I assume that is the goal for this project.

### Response to I-193-3

As discussed in Recirculated Draft EIR Appendix T, Alternatives Withdrawn from Further Consideration, the evaluation and screening of concepts, engineering and environmental refinements, and decisions to withdraw alternatives from consideration has a long history in the development of the Project. The 2009 Alternatives Analysis developed 47 conceptual alternatives that were narrowed to 17 initial alternatives. See also Response to Comment CO-4-15. Regarding project need, see Response to Comment I-10-5 and regarding ridership, see Response to Comment I-13-1.

### Comment I-193-4

**EAST LOS ANGELES**

Atlantic Blvd. and Whittier Blvd.

- Atlantic Blvd. and 6 th Street should be added for the following reasons.

  1. Garfield High School

  2. KIPP Raices Academy

  3. Fourth Street Elementary School

  4. New High School being built at 422 S. Atlantic Blvd. Construction to be complete by Summer 2023

  5. Saint Alphonsus Church

  6. Atlantic Park

  7. The distance between the Atlantic & Pomona station and Whittier Blvd. station is over 1 mile. Densely populated areas need more efficient stops for people to ride the train. Without having to walk a mile to get to a stop. **If you people to ride, add more stops.**

  8. And finally, more residential population that could benefit from riding the Metro

- Atlantic Blvd. and Olympic Blvd. Should **ALSO** have its own station for the following reasons

1. Olympic Blvd. serves as a main corridor for East and West Bound traffic

2. Dense residential population

3. Access to local businesses

4. The nearest proposed station is located on Atlantic Blvd. and Whittier Blvd. making the distance between this station and the Citadel station over 1.3 miles.

**MONTEBELLO**

Washington Blvd. and Greenwood Ave.

- Washington Blvd. and Garfield Ave. should be added for the following reasons.

  1. This intersection is a main artery for all directions. There are many local businesses that employee many people. This could be a great stop so people can get off in this station and walk to their jobs

  2. The distance between the Citadel station and the Washington Blvd. and Greenwood Ave. is much too far, that's over 2.3 miles.

**PICO RIVERA**

Washington Blvd. and Rosemead Blvd.

- Washington Blvd. and Paramount Blvd. should be added for the following reasons.

  1. This area has a large shopping center consisting of a Walmart Super Center, La Barca Restaurant, Lowe's Home Improvement, Ross, PetSmart, Marshalls, Aldi's, Walgreens, Chili's Restaurant, McDonalds and many other small businesses.

  2. The distance between the Washington Blvd. and Greenwood Ave. is much too far, that's over 1.5 miles. The distance is too far for a densely populated area not to have an additional stop.

- Washington Blvd. and Passons Blvd. should be added for the following reasons.

  1. This area has many residential properties and people living in these areas could benefit from an additional stop. The next stop is on Washington Blvd. and Norwalk Blvd. which is over 2 miles between stops

**CITY OF WHITTIER**

Washington Blvd. and Norwalk Blvd.

- Washington Blvd. and Sorenson Ave. should be added for the following reasons.

  1. This area has many residential properties and people living in these areas could benefit from an additional stop. The next stop is on Washington Blvd. and Lambert Rd. which is over 1.6 miles between stops

2. The Sorenson stop could benefit a mixture of business, shopping centers and residential areas.

### Response to I-193-4

For background information on the transit options that have been considered and evaluated for the region and that have led to the evolution and selection of the Project evaluated in the Recirculated Draft EIR, see the Eastside Transit Corridor Phase 2 Alternatives Analysis (AA) Report that was published in 2009 which is provided in Appendix T, Attachment A, of the Recirculated Draft EIR. The AA Report established the purpose and need of the project and identified and assessed transportation alternatives to be studied further in the environmental process. See also Response to Comment CO-4-15.

### Comment I-193-5

4.The Washington Blvd. San Gabriel River 605 freeway overpass bridge seems too low

1. The height of the Washington Blvd. street level and the 605-freeway overpass seem much too low. We would like to see how this is going to be addressed in the EIR.

*[See the photograph in the original Comment Submission I-193 located in Appendix A of the Final EIR]*

### Response to I-193-5

As discussed in Section 3.3.4.3 of Appendix P, Construction Impacts, of this Recirculated Draft EIR, roadway improvements for the Project would occasionally require the lowering of the existing roadway. This scenario would occur for the at-grade guideway in Alternative 1, where Washington Boulevard crosses under I-605. In these instances, excavation to the proposed subgrade would be lower than the existing subgrade. As a result, utilities with a compromised vertical clearance would be protected-in-place or relocated. Full replacement of the roadway would consist of demolition and removal of the existing asphalt, excavation to the designed subgrade, backfilling and compaction of the subbase, application of a tack coat or binder, and installation of the new asphalt using a heavy roller.

### Comment I-193-6

5. The EIR should include information of the type of brake pads that are installed in the train. There should be clear evidence no brake pads containing ASBESTOS are installed moving forward. Brake pads containing ASBESTOS is ILLEGAL as of the late 1990's.

### Response to I-193-6

As noted by the commenter, asbestos was often used in brake pads for heavy rail as well as other vehicles prior to the 1990s. This use has been largely discontinued due to health concerns. The light rail vehicles that will be used will be newer vehicles that do not have asbestos brake pads. No revisions to the Recirculated Draft EIR are required.

### Comment I-193-7

6. The EIR should contain the actual history of paid passengers riding the existing Gold Line from Union Station to the Atlantic Blvd. and Pomona Blvd. station to confirm this extension is NEEDED or if it's even worth **TAXPAYER** money to fund the **$4,000,000,000 BILLION PLUS** dollar project. In addition to all the subsidized TAXPAYER MONEY Metro will get for not having an investment

return on the money. According to study done by a local resident, **this project will take 50-100 years to have a break-even cost, BEST CASE SCENARIO.**

### Response to I-193-7

As discussed in Section 3.14.16.1, existing ridership for the Metro E Line (formerly Metro L [Gold] Line) from Union Station to the Atlantic Station is identified in Table 3.14-1 in the Recirculated Draft EIR.

### Comment I-193-8

7. **Metro should invest and implement Electrical Busses which would cut TAXPAYER money spending to 1/100 of the cost compared to this project.**

### Response to I-193-8

See Response to Comment I-9-2 regarding project cost. For a discussion regarding the evaluation and screening of concepts, engineering and environmental refinements, and decisions to withdraw alternatives from consideration, including buses, refer to Appendix T of the Recirculated Draft EIR. See also Response to Comment CO-4-15.

## I-194: Esperanza Fuentes

### Comment I-194-1

I've lived here in this house for 43 years, and the concern I have is the crossing of pedestrians and vehicles on Washington Blvd.

### Response to I-194-1

See Response to Comment I-36-3 regarding controlled pedestrian and vehicle crossings.

### Comment I-194-2

Also, the noise of the metro, as it is now with the large trucks. Is bad enough.

### Response to I-194-2

Section 3.11, Noise and Vibration, of the Recirculated Draft EIR provides analysis of noise impacts associated with the Project. As described therein, noise generated by the train passing by (passby LRT vehicles) would not exceed the Federal Transit Administration (FTA) moderate noise impact criteria at any sensitive receptors. The impact would be less than significant.

## I-195: Lisa Valentino

### Comment I-195-1

2nd comment - I previously submitted another comment. on Sunday August 21st, my family and I rode the C Line from Norwalk to Aviation station. We had to get to the airport and wanted to see for ourselves what the trains were like. Upon getting on the train, we saw at least a half dozen of transients covered in blankets, etc. in the train carts. We got on a train cart and the train smelled like urine. I know masks are required, not many people were wearing them, I put mine on, simply so that the smell of urine would be lessened. Our young adult daughter rides these trains during

the day ONLY and she says, they always smell like urine. When did these trains became from public transportation to homeless shelters? We absolutely DO NOT want the Eastside corridor to go through our city of Whittier and bring the above problems to our city. We have enough problems already and the police already has their hands full!

Mind you, I grew up in Italy, riding public transportation my entire life, so I am not against public transportation nor am I a snob, I grew up in a modest family and we didn't even have hot water in our house. I am only against the fact that they are now being used as homeless hotels and city, county and state officials etc. are not handling these issues.

### Response to I-195-1

See Responses to Comment Letter I-133 for responses to the commenter's first comment submission. See Response to Comment A-8-19 regarding people experiencing homelessness.

### Comment I-195-2

What will it take, someone getting assaulted or killed before these issues are addressed? I speak for the many many working class citizens who ride the trains everyday, because they sometimes have no other options. They deserve to ride safety without having to worry about getting attacked and without having to smell urine in the trains. Thank you and have a great day!

### Response to I-195-2

See Responses to Comments A-8-19 and I-7-3 regarding crime, security, and people experiencing homelessness.

## I-196: Xavier Arambula

### Comment I-196-1

I wholeheartedly support this project and recommend that it be expedited as quickly as possible. The station at the current terminus at Atlantic should be reconfigured so it's completely underground so as to minimize traffic congestion patterns in that area due to the irregular shape of the land for the proposed new station.

### Response to I-196-1

The commenter's support for the Project and support for the fully underground Atlantic station (relocated/reconfigured) is noted.

### Comment I-196-2

I completely agree with putting the Whittier Blvd and Citadel stations underground too. It's very important to also protect the existing Golden Gate theater building from an possible damage due to the construction of the underground station at the corner of Whittier and Atlantic. The station at the Citadel should be more comprehensive in it's design so that it can also serve as multi-modal transportation hub and not just a "standard" light rail station.

### Response to I-196-2

See Response to Comment CO-4-15 regarding the range of reasonable alternatives considered. Potential impacts to the Golden Gate Theater are discussed in the Recirculated Draft EIR in

Section 3.4.6.1.1. As described in that section, during Project construction, the Golden Gate Theater would not be physically demolished, destroyed, relocated, or altered. As further described in that section and in Section 3.11 of the Recirculated Draft EIR, construction activities would exceed the FTA impact criteria at the Golden Gate Theater, resulting in a significant impact without mitigation. However, as described in Section 3.4.7, MM CUL-1 would require building protection measures to be put in place, such as ground improvements and/or use of lower vibration-generating construction equipment, as identified in a pre-construction survey and building protection report. Implementation of MM CUL-1 and mitigation for vibration impacts identified in Section 3.11 would reduce the potential for vibration generated during construction activities to damage the Golden Gate Theater and would reduce impacts to less than significant.

As described in Section 3.14.6.1 of the Recirculated Draft EIR, the Project would provide bicycle circulation and enhanced access in the immediate station areas, such as bike parking and connections to existing nearby bike facilities within up to a 600-foot radius for improved bicycle-to-transit connections.

### Comment I-196-3

It should include space for buses, ride-sharing vehicles, bikes, etc. Because the Citadel serves not only the local community but it's a regional and tourist destination as well. Metro would be well served to take advantage of that fact to better improve public transit in the region. Improve coordination with other local transit systems to better serve residents and encourage them to use Metro light rail. For example, Commerce's free bus lines can better funnel passengers to the extension of this light rail system by stopping at the Whittier Blvd, Citadel, and Greenwood stations. I'm sure Montebello transit can do similar arrangements.

### Response to I-196-3

As described in Section 3.14.6.1 of the Recirculated Draft EIR, the Project would enhance transit connectivity with the existing local bus network and it would also provide bicycle circulation and enhanced access in the immediate station areas, such as bike parking and connections to existing nearby bike facilities within up to a 600-foot radius for improved bicycle-to-transit connections.

### Comment I-196-4

I've been impressed with the amount and variety of outreach Metro has done on this project. I hope it continues so we can get this project done by 2028.

### Response to I-196-4

The commenter’s support for the Project is noted.

### Comment I-196-5

We need to find the funds to get this done much sooner than later even if it means only doing the underground section first.

### Response to I-196-5

The commenter’s support for Alternative 2 is noted.

### Comment I-196-6

This area of Los Angeles County has been underserved when it comes to passenger rail service. Let's not forget that East LA was, originally, supposed to get a subway line. Due to politics, it hasn't happened.

### Response to I-196-6

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment I-196-7

Though I'm still hoping it will happen and we'll have a subway line going underneath Whittier Blvd where it could connect to this proposed extension of this light rail line at the Whittier and Atlantic station. Thank you, and let's get this done PRONTO!

### Response to I-196-7

The commenter's support for the Project is noted.

## I-197: Joyce Dillard

### Comment I-197-1

Alternative 1 Stormwater Drainage Flood Flows Not considered is any downstream effect on all the cities along the river. This could also effect water rights.

### Response to I-197-1

See Response to Comment CO-4-5 regarding impacts to flood flows from the Project.

As discussed in Section 3.9.6.3.1, operation and construction of Alternative 1 would have less than significant impacts related to stormwater drainage. As described therein, implementation of Alternative 1 would result in a minimal increase in impervious surface but this would not substantially alter existing drainage patterns of either the site or area and would not alter the course of a stream or river. Operation of Alternative 1 would comply with post-construction and erosion control measures in applicable National Pollution Discharge Elimination System (NPDES) permits, low impact development standards, and local policies protecting water quality, as outlined in Section 3.9.2 of the Recirculated Draft EIR. Thus, the Project would have less than significant impacts immediate to the Project site, which would also be the case on downstream communities where the Project's incremental contribution to hydrology would be even less.

Water rights are legal entitlements to which the Project has no relationship. As related to water use and supply, it should be noted that, as discussed in Section 3.16.6.2, operation and construction of the Project would not significantly deplete municipal water supplies during normal, dry, or multiple dry years. Any water use for the Project is expected to be minimal when compared to regional water use consumption. Further, any water use would be in compliance with Metro's Water Use and Conservation Policy, which limits use of potable water during construction when feasible. Therefore, operation and construction of the Project would have a less than significant impact on water supplies.

In summary, because the Project would have less than significant impacts on flood flows, stormwater drainage, and water use, it would have less than significant impacts on downstream communities along the Rio Hondo and San Gabriel River.

## I-198: karyn chen

### Comment I-198-1

Hello. I am very much in favor of alternative 1: Washington. After looking at the proposals, I feel that this would best serve the needs of the community, especially in the light of the cost of gas. I personally go to West Whittier and Santa Fe Springs at least once a month, if not more often. I offer my strong support of alternative 1: Washington.

### Response to I-198-1

The commenter's support for Alternative 1 is noted.

## I-199: Clara and Clara S. Solis

### Comment I-199-1

COMMENTS RE RECIRCULATED DRAFT EIR/EIS FOR THE GOLD LINE EASTSIDE TRANSIT CORRIDOR PHASE 2 (DEIR)

The Recirculated Draft EIR/EIS for the Gold Line Eastside Transit Corridor Phase 2 (DEIR) should have been withdrawn and recirculated with corrections. It was replete with errors and omissions.

### Response to I-199-1

See Responses to Comments I-199-2 through I-199-59 below. As described therein, no corrections to the Recirculated Draft EIR are required that would result in the need for recirculation pursuant to Section 15088.5 of the CEQA Guidelines.

### Comment I-199-2

COMMUNITY OUTREACH WAS INADEQUATE/CIRCULATION PERIOD WAS DURING A COVID 19 SURGE AND SUMMER MONTHS.

g) 1) Community outreach has been ineffective and has not notified communities impacted how this project may impact them. The notices sent to area residents are so devoid of this information that residents will largely ignore them. The notices in some instances arrived after or the day of the hearing. In one instance a resident found the notice thrown in her front yard. (Testimony at 1st East Los Angeles hearing)

### Response to I-199-2

This comment is similar to Comment I-161-3. See Response to Comment I-161-3.

### Comment I-199-3

2) The DEIR was released at a time when residents are unable to participate fully.

a. The DEIR was released during a period of high transmission of Covid 19. Community residents living near freeways have been shown to have worse outcomes from Covid19. See Near-roadway air pollution associated with COVID-19 severity and mortality – Multiethnic cohort study in Southern California https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8416551/ From LA County Public Health website below are the numbers for East Los Angeles and some nearby communities. The death rate for East Los Angeles is one of the highest for a large community - roughly one in 228 residents in East Los Angeles lost their life to Covid 19.

*[See the table in the original Comment Submission I-161 located in Appendix A of the Final EIR]*

Note Boyle Heights is also located near multiple freeways.

### Response to I-199-3

This comment is similar to Comment I-161-4. See Response to Comment 1-161-4.

### Comment I-199-4

b. Was released during summer months when residents typically are not as available. Additionally, during the summer residents are unable to do outreach at schools. Metro typically seems to plan specifically to release its EIR's in East Los Angeles during this time frame so as to limit participation.

### Response to I-199-4

This comment is similar to Comment I-161-5. See Response to Comment 1-161-5.

### Comment I-199-5

c. Was released when residents have other projects to respond to. The Metro Area Plan had community meetings. The I-710 South Corridor Project has had numerous meetings during this time period and the Metro Area Plan Historical Context Statement had a deadline to respond of August 22, 2022. Many community residents who are more active have had their hands full responding to these documents.

### Response to I-199-5

This comment is identical to Comment I-161-6. See Response to Comment I-161-6.

### Comment I-199-6

d. I and my family had Covid 19 during the comment period which lessened my ability to review and respond fully to the document. Additionally, my vacation was scheduled a full year in advance for part of August. This further made it difficult to participate. Finally, my children went back to school and college which also takes a lot of family time.

e. Metro has repeatedly been told not to schedule DEIR during summer months. Yet, they repeatedly do so. It appears there is an intention to not allow the community to fully participate.

f. To fully respond to a document as complex as this. Residents need time to organize and assign different sections to different community members, because of Covid and Summer this community was unable to do this.

### Response to I-199-6

As identified in Response to Comment I-161-5, the CEQA Guidelines do not establish a required or recommended time of year for release of a document for public review. The date selected to release the document for public review is based on overall project schedule considerations and document preparation time, and it is not feasible or appropriate to accommodate the individual schedules of an interested member of the public. The public review period exceeded the 45-day review mandated by CEQA to provide additional time for agencies and the public to review and comment on the Recirculated Draft EIR.

As previously stated, there is no time of year requirement for release of document for public review under CEQA. While the commenter's opinion is that summer is an inconvenient time to review a CEQA document, this may not be the case for all interested members of the public and agencies.

The public had been informed of the expected release of the Recirculated Draft EIR at community meetings and other events approximately one year ahead of time and the exact date of release was publicized over one month in advance of the publication. Regarding the COVID-19 pandemic's affect the public participation in the review of the document, see Response to Comment I-161-4.

### Comment I-199-7

g. Impacted property owners should have been contacted and told what the consequences will be for them. They should have been told:

How long their property would be partially impacted. That their property was going to be fully taken and purchased. Will they be offered first right to purchase the property back? If there is an recession and property values drop? Will the Fair market Value that is offered be at the previous prices? What relocation services will be offered? Will they be able to relocate within the area? I could not find any appendixes on impacted properties.

### Response to I-199-7

The commenter's concern about property acquisition and property values is noted. Regarding public outreach efforts during the Recirculated Draft EIR public review period, see Response to Comments I-162-5 and I-161-3. Additionally, see Response to Comment A-8-21 and Comment B-2-9 for information related to small businesses.

### Comment I-199-8

Residents, schools and businesses should have been notified that they could be impacted by noise and vibration.

### Response to I-199-8

See Response to Comment I-161-3 regarding outreach and notification efforts.

### Comment I-199-9

THE DOCUMENT CONTAINS SUBSTANTIVE ERRORS AND OMISSIONS

Although, I have not had time to fully analyze the DEIR, my limited review thus far has revealed several substantive errors and omissions.

The main DEIR failed to adequately document which businesses will be lost. Two impacted properties were not listed in the main DEIR.

The document failed to list the US Post office at Atlantic and Verona (969-975 S. Atlantic Blvd.). *[See the table in the original Comment Submission I-199 located in Appendix A of the Final EIR]* This post office was built in 1931 and should be listed as a historic resource. It has a distinctive design and has been a mainstay for the community for over 90 years. In the DEIR, it is not listed as being impacted even though a portion will be used as a temporary construction easement.

## Response to I-199-9

Regarding the commenter's allegation that the Recirculated Draft EIR contains substantive errors and omissions, see Responses to Comments I-199-1 through I-199-59 which address the specific comments made in Comment Submission I-199. As described therein, the commenter does not provide substantial evidence of the alleged errors and omissions.

The acquisition of businesses is not a physical impact on the environment and is not required to be addressed under CEQA except where a significant impact on the physical environment would result. Therefore, the acquisition is not analyzed in detail in the main document. The partial and full easements and acquisitions are shown in the conceptual engineering drawings in Volume 2 of the Recirculated Draft EIR.

The East Los Angeles Post Office at 975 South Atlantic Boulevard is located outside of the Area of Potential Effects (APE) for historic properties as discussed in Section 3.4, Cultural Resources, of the Recirculated Draft EIR and shown in Attachment A of Appendix E. The sliver easement is 47 square feet on the northwest corner of Atlantic Boulevard and Verona Street as shown on Sheet R-W-104. This easement is a portion of the pavement area located at the edge of sidewalk near the front entrance to the building and the improvements at this location are confined to curb and gutter modifications. The easement is identified for temporary construction purposes to allow the reconstruction of the adjacent sidewalk and intersection curb ramp. The easement provides the contractor with additional space to carry out the construction and neither the reconstruction nor the easement would impact the building, including the front steps at the building entrance.

See also Response to Comment I-199-11 for additional information.

## Comment I-199-10

The document also failed to list the temporary construction easement at 1002 S. Atlantic Blvd., Los Angeles CA 90022 in Volume 2

1270 Goodrich

## Response to I-199-10

The easement located at 1002 S. Atlantic Boulevard is shown on shown on Sheet R-W-104 in Volume 2 of the Recirculated Draft EIR. The 224 square foot partial acquisition is part of the sidewalk reconstruction of Atlantic Boulevard for the underground tunnel alignment. It is not clear why the commenter references 1270 Goodrich. As shown on Sheet R-W-104 in Volume 2 of the Recirculated Draft EIR, an easement would be located at 1270 Goodrich for the underground tunnel alignment. The parcel and structure would not be acquired or otherwise impacted.

### Comment I-199-11

1. The property is not evaluated historically or for impacts from noise/vibration. *[See the figure of the post office in the original Comment Submission I-199 located in Appendix A of the Final EIR]*

### Response to I-199-11

The properties where cultural resource impacts may occur are identified on APE maps provided in Attachment A of Appendix E, Cultural Resources Impacts Report, of the Recirculated Draft EIR. The property in question (East Los Angeles Post Office at 975 South Atlantic Boulevard) is not located within the APE for historic properties. As identified in Response to Comment I-199-9 above, the easement is a temporary construction easement that would provide the contractor with additional space during reconstruction of the adjacent sidewalk and intersection curb ramp. This reconstruction would not alter the character defining features of the Eastside Post Office building, and based upon the scale and nature of these improvements the entire parcel was not included within the APE. Further, the property, is located along the underground portion of the alignment. Due to the underground nature of the improvements at this location, no construction impacts or permanent visual impacts to historical resources would occur. Implementation of Mitigation Measures MM NOI-2, MM NOI-4, MM NOI-5, MM NOI-7, MM NOI-8, MM NOI-9, MM NOI-14, and MM NOI-15 as described in Section 3.11.7 of the Recirculated Draft EIR and revised in the Final EIR, would reduce construction vibration impacts to less than significant.

### Comment I-199-12

Loss of Businesses, a burden on an Environmental Justice/Community of Color that has been historically impacted by multiple projects.

The impacts and burdens to the Latinx community of East Los Angeles in terms of loss of businesses is not defined, enumerated, analyzed or mitigated. There is no documentation in the main DEIR that clearly shows the names and addresses of the businesses that will be loss or that in anyway analyzes what will be the impacts to area residents from the loss of these businesses.

### Response to I-199-12

There are currently no formal requirements or procedures to evaluate potential direct or indirect impacts specific to environmental justice communities under CEQA Guidelines. See additional information on this and on the baseline used to evaluate the Project's impacts in Response to Comment I-161-9. See Response A-8-21 regarding impacts to businesses.

### Comment I-199-13

CEQA requires that the burden to environmental justice communities be analyzed.

### Response to I-199-13

See Response to Comment 1-161-10 regarding consistency of the CEQA analysis with the 2012 California Attorney General Environmental Justice Fact Sheet. There are currently no formal requirements or procedures to evaluate potential direct or indirect impacts specific to environmental justice communities under CEQA Guidelines.

### Comment I-199-14

Any burden to an environmental justice community that has been historically impacted by multiple government projects should be analyzed and mitigated. In this case the DEIR failed to evaluate

and provide any mitigation for the loss of its businesses. Economic burdens should be analyzed and mitigated.

The Latinx community of East Los Angeles historically has been victim of multiple projects which have had significant impacts on residents.

### Response to I-199-14

There are currently no formal requirements or procedures to evaluate potential direct or indirect impacts specific to environmental justice communities under CEQA Guidelines. See additional information on this and on the baseline used to evaluate the Project's impacts in Response to Comment I-161-9 and see Response to Comment 1-161-10 regarding consistency of the CEQA analysis with the 2012 California Attorney General Environmental Justice Fact Sheet. See Response to Comment A-8-21 regarding impacts to businesses.

### Comment I-199-15

Those projects were the I-710, the SR 60, the I-5, the I-10 and the Metro Gold Line on 3rd which divided a community once again and had significant impacts on residents, their ability to access services, and receive emergency services.

### Response to I-199-15

The commenter refers to impacts from other projects: the I-710, the SR 60, the I-5, the I-10 and the existing Metro E Line (formerly Metro L [Gold] Line) on 3rd Street. The Recirculated Draft EIR considers impacts from projects other than the Project in context of cumulative impacts and the baseline existing conditions. The Recirculated Draft EIR evaluates cumulative impacts as described in Section 3.18.3 of the Recirculated Draft EIR in accordance with the CEQA Guidelines Section 15130 and Section 15355. Pursuant to CEQA Guidelines Section 15125, to determine if a project would have significant physical impacts on the environment, a project's likely near-term and long-term impacts are compared to the existing physical environmental conditions that constitute the baseline. Accordingly, the Project's environmental impacts are analyzed as compared to the baseline, which is defined as being conditions in 2019, as indicated in Section 3.0.2.1 of the Recirculated Draft EIR.

As discussed in Section 3.10.6.1.1, Land Use and Planning, of the Recirculated Draft EIR, the underground segment of the Project along Atlantic Boulevard and Smithway Street is below grade; therefore, it would not physically disrupt any existing land uses and would not physically divide an established community. The at-grade LRT infrastructure along Washington Boulevard, an existing roadway facility, would not physically divide existing neighborhoods, communities, or land uses to the extent to which they would disrupt access to public services or receipt of emergency services. Surrounding land uses would continue to be accessible from both sides of the at-grade guideway to vehicle and non-vehicle users via crossings at signalized intersections.

### Comment I-199-16

Economic and Social Effects

Economic or social effects of a project may be used to determine the significance of physical changes caused by the project. Although primarily directed at physical changes, CEQA regulations require that socioeconomic consequences of the physical change be analyzed. This means evaluating the impacts on an existing community, on religious practices, and on business activity

brought on by the physical changes directly related to the project. For additional information regarding social and economic effects, see Volume4 of the SER.

## Response to I-199-16

The commenter is referring to Section 15131 of the CEQA Guidelines. To clarify, Section 15131 states that "Economic or social information ***may*** be included in an EIR or may be presented in whatever form the agency desires" (emphasis added). Section 15131(a) further states that "Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes." As a result, the Recirculated Draft EIR does not consider economic or social impacts as environmental impacts. The indirect environmental effects of the Project's social and economic impacts are assessed, as applicable, in the individual resource sections of the Recirculated Draft EIR. Metro values local business and is committed to reducing potential negative effects of the Project.

It should be noted that the commenter refers to Volume 4 of the Caltrans Standard Environmental Reference (SER). As stated on the Caltrans website, the purpose of the SER is to "provide a single, standard reference on compliance with the National Environmental Policy Act (NEPA) and related federal laws, executive orders, regulations, and policies. ...This information is for use by Caltrans in the preparation of environmental documentation on projects for which it is the CEQA lead agency."[7] While other agencies, such as Metro (the Lead Agency for the Project) can refer to the document, they are not required to use it. Further, the SER includes CEQA guidance, but as stated above, a primary purpose of the SER is as a NEPA reference guide. As discussed further under Response to Comment I-199-22, the Recirculated Draft EIR is a CEQA-only document and is not required to comply with NEPA. Therefore, as described above, the SER is not applicable to the Recirculated Draft EIR.

## Comment I-199-17

Here the project has failed to consider the impacts on business activity. It has failed to study the impacts of the loss of these businesses on the community.

- East Los Angeles has the highest population density in the County for communities with a population over 100,000, and there are 16,000+ persons per square mile residing in this community. The median household income in East LA is $43,879 compared to $64,251 in the County. There is a high concentration of non-conforming residences (more units than allowed per zone) and higher than average household size. vehicle reliance for mobility results in high parking demand. (Parking Study)

## Response to I-199-17

See Response to Comment I-199-16 regarding economic and social impacts. See Response to Comment A-8-21 regarding economic and social impacts and impacts to businesses. See Responses to Comments I-199-43 through I-199-45 below regarding parking.

7 California Department of Transportation (Caltrans). Agency website: Purpose of the SER. Available at: https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser/purpose-of-ser.

### Comment I-199-18

Cumulative Impacts from Loss of businesses in East Los Angeles:

This project will remove businesses that residents rely upon. Recent projects in East Los Angeles have similarly removed business to create more housing on Whittier and 1st Street.

### Response to I-199-18

See Response to Comment I-199-16 regarding economic and social impacts. See Response to Comments A-8-21 and B-2-9 regarding economic and social impacts and impacts to businesses.

### Comment I-199-19

Now the Metro Area Plan is contemplating re-zoning Community Commercial along Whittier Blvd to Mixed Use. Further, the Metro Area Plan wants to concentrate 9000 additional housing units in the unincorporated regions of Los Angeles even though East Los Angeles is the 30th most dense community out of 265 communities in Los Angeles. It appears to want to achieve this by removing businesses from East Los Angeles and replacing them with dense housing.

### Response to I-199-19

As identified in Section 3.18.6.12 of the Recirculated Draft EIR, an increase in transit service in the region may allow for increased development around station areas; however, such development is anticipated in the local jurisdictions' general plans and would be contingent upon local city zoning regulations and approvals. See also Section 3.18.6.17 of the Recirculated Draft EIR that addresses cumulative impacts associated with growth inducing impacts of the Project.

### Comment I-199-20

The Metro Gold Line on Third Street in East Los Angeles was a business killer. It removed parking and made it difficult for businesses to survive. Most businesses along the stretch from Ford Blvd to Mednik have had a hard time surviving since the Gold Line was built.

### Response to I-199-20

See Responses to Comments A-8-21 and B-2-9 regarding economic and social impacts and impacts to businesses.

### Comment I-199-21

Metro and Regional County Planning staff on the one hand tout wanting residents to walk and use transit, but on the other hand they are removing local businesses that are accessible and within walking distance to East Los Angeles residents.

### Response to I-199-21

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR.

### Comment I-199-22

The cumulative impacts of the removal of businesses have not been studied.

An impact analysis needs to be included for East Los Angeles. It should address both direct and indirect impacts as well as the project's contribution to cumulative impacts. The CEQ NEPA

regulations provide the following definitions of effects as they relate to NEPA analysis (40 CFR §§ 1508.7 and 1508.8, also see Caltrans Guidance for Preparers of Cumulative Impact Analyses).

### Response to I-199-22

Regarding the commenter's statements on compliance with the Council on Environmental Quality (CEQ) NEPA regulations: the Recirculated Draft EIR was prepared in compliance with CEQA, not NEPA and therefore CEQ regulations are not applicable. As stated on page 1-1 of the Recirculated Draft EIR, the Recirculated Draft EIR was prepared to satisfy the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000, et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Chapter 3, Section 15000, et seq.).

The commenter's assertions regarding cumulative impacts of removal of businesses are similar to the content of Comment I-199-17 and Comment I-199-18; as noted in the Response to Comment I-199-17 and Response to Comment I-199-18, see Response to Comment I-199-16 regarding economic and social impacts and Responses to Comments A-8-21 and B-2-9 regarding economic and social impacts and impacts to businesses.

### Comment I-199-23

- Direct effects are caused by the action and occur at the same time and place.
- Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth- related effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

### Response to I-199-23

Comment I-199-23 cites from the definition of "effects" from the National Environmental Policy Act Implementing Regulations (40 CFR Section 1508.1). As identified in Response to Comment I-199-22, the Project is not subject to NEPA regulations. Pursuant to CEQA, the Recirculated Draft EIR evaluates direct and indirect environmental effects as defined in the CEQA Guidelines Section 15064(d)(1) and Section 15064(d)(2), respectively. Per the CEQA Guidelines, direct physical changes in the environment are caused by and immediately related to the project. Indirect physical changes in the environment are not immediately related to the project, but are caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment. Indirect physical changes are considered only if that change is a reasonably foreseeable impact which may be caused by the project; a change which is speculative or unlikely to occur is not reasonably foreseeable. The Recirculated Draft EIR addresses direct and indirect impacts in that manner, consistent with CEQA requirements.

### Comment I-199-24

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

### Response to I-199-24

Comment I-199-24 cites from the definition of "effects" from the National Environmental Policy Act Implementing Regulations (40 CFR Section 1508.1). As identified in Response to Comment I-199-22, the Project is not subject to NEPA regulations. The Recirculated Draft EIR evaluates cumulative impacts as described in Section 3.18.3 of the Recirculated Draft EIR in accordance with the CEQA Guidelines Section 15130 and Section 15355. Per the CEQA Guidelines, "'Cumulative impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. (a) The individual effects may be changes resulting from a single project or a number of separate projects. (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." The Recirculated Draft EIR addresses cumulative impacts in that manner, consistent with CEQA requirements.

### Comment I-199-25

The cumulative impacts section mentions the Dangler and 3rd project a 78 unit project not together with the project as causing cumulative impacts. However, the Dangler and 3rd project already has had a negative impact on community residents when a sewage line was ruptured.

### Response to I-199-25

As described in Section 3.18.2.2 of the Recirculated Draft EIR, pursuant to CEQA Guidelines Section 15130, a lead agency must consider whether a cumulative impact is significant and, if so, whether the project's incremental contribution to that impact is cumulatively considerable. When the project's incremental effect is not cumulatively considerable, the effect need not be considered significant, however the basis for concluding that the incremental effect is not cumulatively considerable must be described.

CEQA Guidelines Section 15355 describes how an individual effect alone does not represent a cumulative effect if it does not, when considered with one or more individual effects, become considerable or compound or increase other environmental impacts. The commenter does not identify the cause of the sewer line rupture or otherwise provide evidence to show that there is an associated cumulative impact, nor does the commenter provide substantial evidence to show that the Project would make a cumulatively considerable contribution to a significant impact. As described in Section 3.16, Utilities and Service Systems, of the Recirculated Draft EIR, neither construction nor operation of the Project would generate large amounts of wastewater and it would not exceed the capacity of the wastewater system. Additionally, while some existing utilities, including sewer lines, may require relocation during Project construction, no significant project impacts or cumulative impacts associated with this relocation are anticipated (See Section 3.16, Section 3.18.6.16, and Section 3.3.4.6 in Appendix P, Construction Impacts, of the Recirculated Draft EIR).

### Comment I-199-26

Along Third Street water would naturally flow from First Street down to Gratian. Residents historically, played in the water there where toads existed.

### Response to I-199-26

Pursuant to CEQA requirements, the Project's environmental impacts are analyzed as compared to the baseline, which is defined as being conditions in 2019, as indicated in Section 3.0.2.1 of the Recirculated Draft EIR.

### Comment I-199-27

The Dangler/3rd project caused a sewage leak which left residents on Gratian behind Lupe's Burritos stuck with sewage smells for days.

### Response to I-199-27

See Response to Comment I-199-25 and Section 3.1 Aesthetics and Section 3.18 Cumulative Impacts of the Recirculated Draft EIR.

### Comment I-199-28

Additionally, public testimony indicated that the residents who live in the area bounded by the 3rd Street Gold Line, the Pomona Freeway, the I-710 freeway and Mednik whose only ingress/egress is through 3rd Street will be impacted by the 3rd/Dangler project. One resident spoke of only having one horizon to look out at and that was over 3rd Street, now she will see a 4 story building.

### Response to I-199-28

See Response to Comment I-199-25.

### Comment I-199-29

Further, with more transit along Atlantic there will be more Transit Oriented Development. Already East Los Angeles is the 30th most dense community out of 265 communities, the most dense community among communities with populations above 100k, has around 16k people per square mile and a high number of occupants per unit.

### Response to I-199-29

As identified in Section 3.18.6.12 of the Recirculated Draft EIR, an increase in transit service in the region may allow for increased development around station areas; however, such development is anticipated in the local jurisdictions' general plans and would be contingent upon local city zoning regulations and approvals. Therefore, development around station areas would occur in a planned and regulated manner. The Project would not result in incremental effects relative to unplanned population growth that could be compounded or increased when considered together with similar effects from other related land development projects.

### Comment I-199-30

The plan of some is to increase density along rail to increase housing. The Metro Area Plan seeks to build 90 K plus units in unincorporated Los Angeles. East Los Angeles is obviously being seeing as a target for this increased density, but it already is dense.

### Response to I-199-30

See Response to Comment I-199-29. Additionally, as discussed in Section 3.12, Population and Housing, of the Recirculated Draft EIR, the Project would not result in substantial changes to the existing population of unincorporated Los Angeles. While it may encourage growth in surrounding

areas, that growth would be contingent upon local city zoning regulations and approvals, which would consider a development's consistency with local general plans and transit-oriented development policies; therefore, any growth is anticipated to be consistent with local polices and requirements, and local growth projections.

### Comment I-199-31

While some believe increasing density along transit corridors will reduce traffic, in East Los Angeles this will never happen. So, planning this way does nothing but create misery among residents who will see even more congestion, traffic, pollution, less parking and less businesses for them to easily shop at.

### Response to I-199-31

Evaluation of impacts associated with new development that may occur in the future is outside of the scope of the Recirculated Draft EIR. Regarding the Project's potential incremental impact when added to other closely related past, present, and reasonably foreseeable probable future projects, see Section 3.18 of the Recirculated Draft EIR, specifically, Section 3.18.6.14 regarding transportation and traffic, Section 3.18.6.2 regarding air quality, and Section 3.18.6.17 regarding the Project's growth inducing impacts.

### Comment I-199-32

Why, because East Los Angeles is a special case. It has 4 major freeways running through it. Its traffic mainly comes from outside. Unless, cars driving through the freeway are not allowed to exit, there will always be traffic. What will be the impacts of having 4 story buildings in an area so heavily impacted by air pollution and fugitive dust from the freeways. Will the pollution be trapped by the buildings.

### Response to I-199-32

Evaluation of impacts associated with residential development that may occur in the future is outside of the scope of the Recirculated Draft EIR. Regarding the Project's potential incremental impact when added to other closely related past, present, and reasonably foreseeable probable future projects, see Section 3.18 of the Recirculated Draft EIR, specifically, Section 3.18.6.14 regarding transportation and traffic and Section 3.18.6.2 regarding air quality.

### Comment I-199-33

What about heat island impacts? Where have heat island impacts been studied in this document?

### Response to I-199-33

The project area is already a highly developed urban setting with a high density of impervious surfaces, such as buildings and roads, which absorb and re-emit solar radiation more readily than natural landscapes, thus resulting in heat island effects. While the Project would not substantially change the existing heat island effects, consistent with Los Angeles County Green Building Code (Title 31), roofing materials for aboveground structures greater than or equal to 25,000 square feet would be constructed to meet cool roof requirements for the reduction of heat island effects. Existing impervious structures/surfaces that would be replaced with the new structures (e.g., for implementation of the MSF) may not meet the current code requirements for solar reflectance and thermal emittance, and thus, a fractional reduction in existing heat island effects may occur.

### Comment I-199-34

Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth- related effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems. In the foreseeable future, a multitude of 3 and 4 story buildings could populate Third, Atlantic and Whittier, additionally such projects allow for smaller open space requirements on the parcel. These projects will further increase the density of the already densest large community in the County. These building could exacerbate already bad air pollution, heat island impacts, resulting in poor outcomes for residents. These outcomes were not studied.

### Response to I-199-34

The Recirculated Draft EIR evaluates indirect effects as defined in the CEQA Guidelines Section 15064(d)(1) and Section 15064(d)(2), respectively and described in Response to Comment I-199-23.

Section 3.17 of the Recirculated Draft EIR evaluates potential growth-inducing impacts in accordance with CEQA Guidelines Section 15126.2(e). This section of the Recirculated Draft EIR includes analysis of reasonably foreseeable future growth and potential impacts that may result. As described therein, operation and construction of the Project would result in less than significant growth-inducing impacts and no mitigation is required.

Section 3.18 of the Recirculated Draft EIR evaluates cumulative impacts, including potential cumulative impacts from changes which result from the incremental impact of the Project when added to other closely related past, present, and reasonably foreseeable probable future projects. This section includes analysis of reasonably foreseeable probable future projects as suggested by the commenter.

### Comment I-199-35

IMPACTS FROM REMOVAL OF BUSINESSES NOT STUDIED AND WILL HAVE NEGATIVE IMPACTS

Additionally, the removal of businesses is also concerning to residents of East Los Angeles who have contemplated Cityhood for East Los Angeles the loss of businesses will further make this more difficult for area residents to have a sufficient economic base.

East Los Angeles needs more businesses and supermarkets. The location of the Atlantic/3rd/Beverly station used to house a grocery store. Before the freeways, East Los Angeles used to have grocery stores. Now, resident's access to fresh healthy foods from super markets and produce centers is limited. Some might even call it a food desert.

### Response to I-199-35

See Responses to Comments A-8-21 and B-2-9 regarding economic and social impacts and impacts to businesses.

### Comment I-199-36

HOUSING IMPACTS NOT STUDIED/ POSSIBLE GENTRIFICATION – INCREASED DISPLACEMENT OF EXISTING RESIDENTS

How this project will impact housing is not addressed. A presentation on the Metro Area Plan seemed to designate some of the business areas that will be lost as areas for Transit Oriented Development, including housing which would be 80 percent Market Rate and 20 percent "affordable". We have seen such plans with 80 percent market rate projects putting upward pressure on area rents in surrounding neighborhoods. Developers typically choose the plans which tender the least number of units that are affordable. See https://jorgedelaroca.name/p_latoc.pdf. Housing accessible by lower middle income and middle income residents is not the choice of developers.

Will this gentrify East Los Angeles? See Transit Oriented Displacement, MIT Press by Karen Chapple and Anastasia Loukaitou-Sideris.

### Response to I-199-36

This comment is similar to Comment I-161-8. See Response to Comment I-161-8.

### Comment I-199-37

DEIR FAILS TO CORRECTLY ANALYZE RACE AND ETHNICITY

The DEIR fails to correctly analyze race and ethnicity and its impacts on environmental justice communities. Because it uses the Race Series instead of the Hispanic Race Series it fails to identify an environmental justice community. Since it has not identified the community properly it cannot and does not evaluate the impacts and burdens on the environmental justice community of East Los Angeles. Table 6-4, in Appendix M shows a community that is 51 percent White. According to Dr. Manuel Pastor, “The percent “minority” is defined – particularly in California – as the share of the population that is not non-Hispanic white. So, it’s Latinos plus non-Hispanic (NH) Black, NH-AAPI, NH- Native Americans, and NH Other/mixed.”

See the website, the National Equity Atlas for the definition of race/ethnicity. https://nationalequityatlas.org/about-the-atlas#data The state of California uses a similar method: https://dof.ca.gov/forecasting/demographics/

### Response to I-199-37

This comment is similar to Comment I-161-9. See Response to Comment I-161-9.

### Comment I-199-38

This is important, because CEQA requires that environmental impacts must be considered in context, cities and counties should pay special attention to whether a project might cause additional impacts to communities that already are affected by, or particularly vulnerable to, environmental impacts like air and water pollution.

By using incorrect analysis and methods the Metro DEIR cannot correctly evaluate the impacts to communities of color/ environmental justice communities and in this instance to the Latinx community of East Los Angeles.

### Response to I-199-38

This comment is similar to Comment I-161-9. See Response to Comment I-161-9.

## Comment I-199-39

See below a portion of Table 6-4 *[See the table in the original Comment Submission I-199 located in Appendix A of the Final EIR]* of Appendix M which identifies the population within a mile of the stations as being 51 percent white.

A memo issued by the office of then California Attorney General Kamala Harris, now States Vice President, stated:

Cities, counties, and other local governmental entities have an important role to play in ensuring environmental justice for all of California's residents. Under state law:

"[E]nvironmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

## Response to I-199-39

See Response to Comment I-161-9 regarding corrections made to Table 6-4, and Response to Comment 1-161-10 regarding consistency of the CEQA analysis with the 2012 California Attorney General Environmental Justice Fact Sheet. There are currently no formal requirements or procedures to evaluate potential direct or indirect impacts specific to environmental justice communities under CEQA Guidelines.

## Comment I-199-40

Although CEQA focuses on impacts to the physical environment, economic and social effects may be relevant in determining significance under CEQA in two ways. (See CEQA Guidelines, §§ 15064, subd. (e), 15131.) First, as the CEQA Guidelines note, social or economic impacts may lead to physical changes to the environment that are significant. (Id. at §§ 15064, subd. (e), 15131, subd. (a).) To illustrate, if a proposed development project may cause economic harm to a community's existing businesses, and if that could in turn "result in business closures and physical deterioration" of that community, then the agency "should consider these problems to the extent that potential is demonstrated to be an indirect environmental effect of the proposed project." (See Citizens for Quality Growth v. City of Mt. Shasta (1988) 198 Cal.App.3d 433, 446.)

Government Code

Government Code section 11135, subdivision (a) provides in relevant part: No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state..

While this provision does not include the words "environmental justice," in certain circumstances, it can require local agencies to undertake the same consideration of fairness in the distribution of environmental benefits and burdens discussed above.

## Response to I-199-40

See Response to Comment I-199-16 regarding CEQA requirements related to social and economic effects; see Response to Comment I-161-10 regarding consistency of the CEQA analysis with the

2012 California Attorney General Environmental Justice Fact Sheet; and see Response to Comment A-8-21 for additional information on small businesses.

### Comment I-199-41

Where, for example, a general plan update is funded by or receives financial assistance from the state or a state agency, the local government should take special care to ensure that the plan's goals, objectives, policies and implementation measures (a) foster equal access to a clean environment and public health benefits (such as parks, sidewalks, and public transportation); and (b) do not result in the unmitigated concentration of polluting activities near communities that fall into the categories defined in Government Code section 11135. 1 In addition, in formulating its public outreach for the general plan update, the local agency should evaluate whether regulations governing equal "opportunity to participate" and requiring "alternative communication services" (e.g., translations) apply. (See Cal. Code Regs., tit. 22, §§ 98101, 98211.)

### Response to I-199-41

This comment is similar to Comment I-161-13. See Response to Comment I-161-13.

### Comment I-199-42

Note the direction in the footnote:

1 To support a finding that such concentration will not occur, the local government likely will need to identity candidate communities and assess their current burdens.

The DEIR fails in this regard, because it has failed to identify the communities properly and to evaluate their burdens.

### Response to I-199-42

This comment is similar to Comment I-161-14. See Response to Comment I-161-14.

### Comment I-199-43

PARKING

Metro has a poor reputation in East Los Angeles for its broken promises and constantly changing policies. Prior to construction of the Gold Line, Metro promised parking would be free at their parking structure. Subsequently, Metro decided to change their policy with the result that Metro Gold Line users from other communities now use the residential streets of East Los Angeles to park for free. See page 6 of the East Los Angeles Parking Availability Improvement Study (Parking Study) Existing Parking Conditions September 24, 2021, which states, "*Privately-owned off-street parking, as noted via the stakeholder outreach, is being encroached upon ..... In areas near transit, the encroachment is coming from commuters whom do not want to pay for parking at the transit station.*"

Metro's plan for dealing with parking is not to deal with parking. For example Parking will not be provided at the Atlantic/Whittier Station. Yet, parking was identified as an area of concern by community members in public comments and identified as an area of controversy in the DEIR. According to the parking study already areas on Atlantic and Whittier already do not have enough parking during week days. Socioeconomic Effects Under CEQA considered socioeconomic in nature are any effects that would result in inadequate parking capacity.

### Response to I-199-43

Pursuant to SB 743, adequacy of parking is not a significant impact under CEQA (see Pub. Resources Code, § 21099(b)(3)). As described in Section 2.5.1.2 in Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the Atlantic/Pomona station (relocated/reconfigured), and surface parking would be provided at Greenwood station and each of the at-grade stations.

### Comment I-199-44

The short supply and subsequent shorter supply when this project is build would result in cumulative impacts as well.

Residential parking on Whittier and Atlantic is shown below to have a deficit. As with the Gold Line on 3rd Street there is no reason to believe that commuters from nearby communities won't park in residential streets near the Whittier/Atlantic station. *[See the table provided in the original Comment Submission I-199 located in Appendix A of the Final EIR]*

### Response to I-199-44

Pursuant to SB 743, adequacy of parking is not a significant impact under CEQA (see Pub. Resources Code, § 21099(b)(3)).

### Comment I-199-45

The impact on parking has not been addressed and mitigation has not been studied or provided.

### Response to I-199-45

Pursuant to SB 743, adequacy of parking is not a significant impact under CEQA (see Pub. Resources Code, § 21099(b)(3)). As described in in Section 2.5.1.2 in Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the Atlantic/Pomona station (relocated/reconfigured), and surface parking would be provided at each of the at-grade stations.

### Comment I-199-46

HAZARDS:

Water With Climate Change it is anticipated California will see more intense weather and wildfires. The New York Times recently reported on a possible megastorm which could see 2 inches of rain an hour in Los Angeles' hillsides. The next super storm could come in the next 40 years. What would be the impact to the underground section of the Gold Line? Where is that considered? East Los Angeles in the past has seen damage from floods on Floral in 1938, near Fisher in 1913. The Long Beach freeway routinely floods. East Los Angeles has many former water ways, how will the diversion of these impact the rest of the community?

### Response to I-199-46

The underground alignment is not within the 100-year floodplain, as discussed in Section 3.9.5.5.1 and shown in Figure 3.9.3 of the Recirculated Draft EIR. Thus, it is not expected that the underground alignment would be inundated in a 100-year flood, which is the design flood considered in planning the alignments of underground segments. Notwithstanding, if there were

to be a flood event, "mega-flood" or otherwise, that inundates the LRT tracks during operation of the Project, operation of the train system shall not occur, as specified in project measure PM HWQ-4 (see Section 3.9.7 of the Recirculated Draft EIR).

## Comment I-199-47

Gas and Oil

Throughout Los Angeles Oil Wells were dug and many times abandoned. Some of these were never mapped. Here is an oil well map from the state of California. https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.16372/34.02812/15

*[See the map in the original Comment Submission I-199 located in Appendix A of the Final EIR]*

Yet, it appears in this 1932 Anton Wagner photo that there maybe an oil well behind Ford and Cesar Chavez. That does not appear on the map. See below:

*[See the historic figure in the original Comment Submission I-199 located in Appendix A of the Final EIR]*

Additionally, there are gas lines which run not too far from the project line in East Los Angeles. What would happen if there was a leak and explosion?

https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d6 7796 9335 s

The light blue lines are high pressure distribution lines. The dar blue are transmission lines. *[See the map in the original Comment Submission I-199 located in Appendix A of the Final EIR]*

## Response to I-199-47

Section 3.8, Hazards and Hazardous Materials, of the Recirculated Draft EIR provides a detailed discussion of existing subsurface gas conditions (see Section 3.8.5.6), oil and gas wells (see Section 3.8.5.6 and Figure 3.8.4), and petroleum and natural gas pipelines (see Section 3.8.5.7 and Figure 3.8.4) within the resource study area (RSA) for hazards and hazardous materials. These wells and pipelines were identified through searches of the U.S. Department of Transportation (USDOT) National Pipeline Mapping System online database and the State of California Department of Conservation, California Geologic Energy Management Division Well Finder online database. The wells and pipelines cited in the comment appear on Figure 3.8.4 and were considered in Impact HAZ-2 in Section 3.8 of the Recirculated Draft EIR.

The potential for an explosion associated with gas lines outside the RSA is beyond the scope of the Recirculated Draft EIR, as the Project would not have the potential to exacerbate risks associated with those gas lines.

## Comment I-199-48

Former and current gas stations -UST's: It is well known that many brown fields exist from gas stations where Underground Storage Tanks were never removed. In examining the records from the US Post Office on Atlantic and Verona at one point, a permit was pulled to remove a 5000 gallon tank. What the tank held is not mentioned. Further, the tank was apparently never removed

as the permit was cancelled – see below: *[See the figure in the original Comment Submission I-199 located in Appendix A of the Final EIR]*

Additionally, there was a gas station at 5085 E. Third Street near the corner of Woods and Third Street. I see no indication that the underground storage tank (UST) was ever removed. This is the current location of the 3 story National Core Alta Vista apartment buildings. If the UST was never removed contamination could have spread. The digging of the underground section could come across this and contamination could spread to neighborhood homes if not properly mitigated.

The Environmental Protection Agency website states:

A typical leaking underground storage tank (LUST) scenario involves the release of a fuel product from an underground storage tank (UST) that can contaminate surrounding soil, groundwater, or surface waters, or affect indoor air spaces.

The links below describe the dangers from leaking underground storage

tanks: https://www.epa.gov/ust/leaking-underground-storage-tanks-corrective-action-resources

Underground Storage Tanks:

https://www.csu.edu/cerc/documents/LUSTThreattoPublicHealth.pdf *[See the table in the original Comment Submission I-199 located in Appendix A of the Final EIR]*

I was not able to do an extensive search, but merely checked locations where I knew there had been a gas station in the past.

## Response to I-199-48

A Draft Final Initial Site Assessment (ISA) Report was prepared for the Project (see Attachment A of Appendix I of the Recirculated Draft EIR). For preparation of the ISA, an EDR database search was conducted for listings within the appropriate ASTM minimum search distance of the Project. EDR utilizes a geographical information system to plot the locations of reported spills, leaks, and incidents, and this information establishes if properties within, or near the Project area have the potential to affect the Project. The ISA also includes a review of standard historical sources including aerial photographs, topographic maps, and Sanborn Fire Insurance Maps to supplement regulatory agency database records. In addition, a review of the USDOT National Pipeline Mapping System online database and the State of California Department of Conservation, California Geologic Energy Management Division Well Finder online database was conducted during preparation of the ISA. Furthermore, publicly available databases maintained under Public Resources Code Section 65962.5 (i.e., the Cortese List) were searched to determine whether any known hazardous materials are present in the DSA.

As identified in Section 3.8.5.2, 30 properties in the resource study area for hazardous materials have documented releases. The affected properties are listed in Table 3.8-1 on pages 3.8-9 through 3.8-17 and depicted graphically on Figure 3.8.3 on page 3.8-18 of the Recirculated Draft EIR. As described throughout Section 3.8.2 of the Recirculated Draft EIR, there is an established, comprehensive federal, state, regional, and local framework independent of the CEQA process that is intended to reduce the risks associated with the use, transport, and disposal of hazardous materials, and Metro would be required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases (see Attachment A of Appendix I of

the Recirculated Draft EIR for further discussion of the regulatory framework applicable to hazards and hazardous materials).

An additional 98 properties were identified that may have potential subsurface contamination from undocumented releases associated with current and/or historical uses of the properties (e.g., former railroad corridors, former gas stations, former dry cleaners, or former industrial properties). The location of these 98 additional properties is provided in Attachment A of Appendix I of the Recirculated Draft EIR. Mitigation measures to address the potential for encountering contamination of soils or groundwater during construction are MM HAZ-1 through MM HAZ-4. These mitigation measures are provided in full in Section 3.8.7.2 of the Recirculated Draft EIR and revised in the Final EIR; revisions to MM HAZ-1 are discussed in Response to Comment A-11-20. These measures establish a protocol for construction by which the aforementioned requisite federal, state, regional, and local hazardous materials risk reduction framework be implemented for properties with potential, undocumented releases of hazardous materials.

With the application of these mitigation measures, construction of each alternative would have a less than significant impact related to the creation of significant hazards to the public, including children and schools, through transportation, storage, use, and disposal of hazardous materials. These mitigative safeguards and federal, state, regional, and local risk reduction frameworks against hazardous material exposure would result in a less than significant impact relative to hazardous materials and would therefore not be expected to meaningfully contribute to the human health risks associated with construction, analyzed in Section 3.2.6.5 of the Recirculated Draft EIR.

### Comment I-199-49

Amount of Contamination near build area is concerning:

It is concerning that so many LUST site and contamination exists near to the build area to be excavated for the underground section. Additionally, it is concerning that so many schools are within a half mile of this. How will construction deal with keeping the children safe from so much contamination? It doesn't appear that the magnitude of this is contemplated.

### Response to I-199-49

See Section 3.8.6.3 of the Recirculated Draft EIR that addresses risks associated with hazardous emissions and the handling of hazardous materials in the vicinity of schools and Response to Comment I-199-48 above regarding Project mitigation and federal, state, regional, and local risk reduction frameworks against hazardous material exposure that would result in a less than significant impact relative to hazardous materials.

### Comment I-199-50

Evacuation Routes not properly analyzed in East Los Angeles:

We are concerned that evacuation routes and emergency response delays were underestimated by the DEIR. We have experienced significant delays when there is an accident any where near the Gold Line. Traffic can back up for a half hour. Many residents abandon their vehicles on Mednik and Third and walk home. Atlantic at times is very congested. Construction delays on or near Atlantic with an accident or an emergency should be studied. The evaluation here is insufficient.

## Response to I-199-50

Emergency evacuation is addressed in Section 3.8, Hazards and Hazardous Materials, of the Recirculated Draft EIR. As stated therein, in the event of an emergency, Los Angeles County would implement its adopted Operational Area Emergency Response Plan, which applies to both the unincorporated county and all incorporated cities in the county. The Operational Area Emergency Response Plan establishes the coordinated emergency management system, which includes prevention, protection, response, recovery, and mitigation within the Operational Area.

I-605 freeway is identified as a primary disaster route, and Washington Boulevard is identified as a secondary disaster route for the Los Angeles County Operational Area, and both are designated as emergency evacuation routes for the cities of Commerce, Montebello, Pico Rivera, Santa Fe Springs, and Whittier.

As discussed in Impact HAZ-6 (Section 3.8.6.6), operations would not affect emergency evacuation plans and roadway conditions as the roadway width and configuration would be kept accessible to emergency vehicles and fire equipment. As standard practice, and as identified in project measure PM HAZ-1 (Section 3.8.7.1), the contractor would coordinate with fire and police protection officials when designing grade crossings to ensure that emergency access would be maintained. Metro shall be included in all correspondence with third parties. In addition, all new LRT guideway, stations, and crossings would be designed in accordance with Metro Rail Design Criteria, including Fire/Life Safety Design Criteria, to ensure safety and minimize potential hazards at all locations. Further, compliance with applicable county and city design criteria pertaining to emergency vehicle access, as well as the California Fire Code standards, would ensure that sufficient ingress and egress routes would be provided to new and relocated/reconfigured stations.

Temporary lane closures may be required and emergency routes may be temporarily disrupted during construction activities. The RSA is a fully built roadway network with parallel streets in every direction. Detour routes, of which there are multiple options, would be established in consultation with emergency service providers. As identified in PM HAZ-2 (Section 3.8.7.1 of the Recirculated Draft EIR, as revised in the Final EIR), standard practices require that lane and/or road closures are scheduled to minimize disruptions and that a Traffic Management Plan is prepared and approved in coordination with local fire and police departments prior to construction including the development of detour routes to facilitate traffic movement (see MM TRA-1, discussed in Section 3.14, Transportation and Traffic, and Appendix N of the Recirculated Draft EIR and revised in the Final EIR for further discussion of traffic control plans). The nearest local first responders would be notified, as appropriate, of traffic control plans during construction to coordinate emergency response routing.

## Comment I-199-51

Further, what if there is an incident on the Underground section of the Gold Line, what is the plan. This is not sufficiently analyzed. What if there is a gas explosion? What if there is an earthquake with multiple injuries. What if there is flooding? Not enough analysis is done here.

Additionally, what if there is an emergency at one of the schools, and multiple responses are needed?

Evacuation Routes HAZ 6 Not applicable - this does not make sense. I am concerned that evacuation routes were not adequately studied in this project.

The DEIR has failed to properly analyze how the project might exacerbate existing community evacuation risks. Additionally, will a possible need to evacuate residents in the nearby area in a major disaster be affected by the evacuation of the project's occupants?

### Response to I-199-51

The potential for when or if these disasters occur and the physical impacts that could result is speculative. Trying to forecast the Project's physical impacts on the environment without substantial evidence supporting the assertion would require a level of speculation that is inappropriate for an EIR.

Section 3.6, Geology, Soils, and Paleontological Resources, provides a detailed description of existing seismic hazards and Impact GEO-1 provides a comprehensive and thorough analysis of the potential for strong seismic ground shaking to result in injury or death. Section 3.9 of the Recirculated Draft EIR, as revised in the Final EIR, provides a detailed description of flood hazards and Impact HWQ-3 provides a comprehensive and thorough analysis of the potential for the Project to cause flooding. Section 3.8 of the Recirculated Draft EIR, as revised in the Final EIR, addresses risks to the public associated with methane and hydrogen sulfide and the proximity of the alignment to natural gas pipelines and oil or gas wells. Also see Response to Comment I-199-52 regarding seismic risk.

See Response to Comment I-199-50 regarding evacuation routes.

### Comment I-199-52

Earthquakes:

The statement that there could be structural damage and failure and lives can be lost is concerning. - Alternative 1 is located in a seismically active area, as is most of southern California and, thus, operation of Alternative 1 would potentially be subject to seismic ground shaking. Seismic shaking could result in damage to structures or human injury or death.

### Response to I-199-52

The comment is a partial representation of the full analysis contained in the Recirculated Draft EIR and presented in Section 3.6.6.1. The statement that Southern California experiences seismic shaking and that seismic shaking could result in damage to structures or human injury or death is intended to define the general seismic conditions of the area in which the Project is located. The Recirculated Draft EIR elaborates on this statement by explaining: "The potential to experience substantial seismic ground shaking is a common hazard for every project in Southern California. Structures have been and continue to be successfully designed and constructed based on mandatory design criteria as described below." Then, the Recirculated Draft EIR analyzes the potential seismic hazard impact based on seismic conditions and project design. Section 3.6.7 further describes project measure PM GEO-1 that would be implemented regarding seismic design standards and compliance measures. The analysis concludes that the project would have a less than significant impact relative to Impact GEO-1, Exposure to Seismic Hazards.

### Comment I-199-53

NOISE AND VIBRATION:

It appears that the open air option will have more vibration and noise impacts to residents along the line. I believe the other option is superior in this regard and if this project goes forward that route is superior in that it has less impacts.

### Response to I-199-53

The commenter's preference for the fully underground Atlantic station (relocated/reconfigured) is noted. While is it correct that the open air station would have greater audible noise and vibration at the surface than the fully underground station (Base Alternatives), construction and operation of the open-air station (Atlantic/Pomona Station Option) would not result in any increase in impacts to sensitive noise receptors as compared to the fully underground station. This is described on page 3.11-20 for operations and page 3.11-26 for construction in Section 3.11.6.1.1 of the Recirculated Draft EIR. With mitigation, noise impacts associated with construction and operation of either station design would be less than significant.

As discussed in Section 3.11.6.2.1 on page 3.11-36 – 3.11-37 (operations) and page 3.11-39 (construction), while operation and construction of the Project with the fully underground or open air station would impact the same number of residences, there would be some differences in which residences would be affected due to the variation in the alignment extending south from the station (see Attachment A of Appendix L for a map of affected properties). For both station designs, with implementation of mitigation, the impacts associated with both the Atlantic Station open design option and the fully underground option would be less than significant after mitigation.

### Comment I-199-54

Further, if there is ultimately found to be methane underground the open air option could impact nearby homes on Woods and 3rd.

### Response to I-199-54

See Section 3.8.5.6 in Section 3.8, Hazards and Hazardous Materials, of the Recirculated Draft EIR and revised in the Final EIR. As discussed therein, the Los Angeles County Public Works Department does not identify methane gas buffer zones within the Project alignment. In addition, the Final Draft ISA Report did not identify subsurface methane or hydrogen sulfide gases.

### Comment I-199-55

Schools

There are more schools in East Los Angeles impacted by this project than in any other community. It is not clear that each of the schools in East Los Angeles close to the project where analyzed for impacts in the noise and vibration study. Additionally, it does not appear that Atlantic Park was identified in the study. It doesn't appear to have been analyzed for impacts.

It is concerning that Kipps Raices school will be impacted. We are concerned that the mitigation measures will likely not be followed by workers. It seems unlikely that they will roll items.

Most of these schools do not appear to be analyzed in the noise and vibration study. This section of the report was very confusing and given the limited time for review the categories of the institutions, schools hospitals was confusing.

- Greenwood Elementary School located at 900 South Greenwood Avenue, Montebello

- Calvary Chapel Christian Academy, 931 South Maple Avenue, Montebello
- KIPP Promesa Prep located at 5156 Whittier Boulevard, Los Angeles
- KIPP Raices Academy located at 668 South Atlantic Boulevard, East Los Angeles
- 4th Street Elementary located at 420 Amalia Avenue, Los Angeles
- Garfield High School located at 5101 East 6th Street, Los Angeles
- Monterey Senior High School, 466 South Fraser Street, Los Angeles
- St. Alphonsus School, 552 South Amalia Avenue, Los Angeles
- Griffith STEAM Magnet Middle School, 4765 East Fourth Street, Los Angeles
- Arts in Action Community Charter Elementary School, 5115 Via Corona Street, Los Angeles

Has the project looked at local daycares within a half mile of the project?

## Response to I-199-55

Relative to the commenter's assertion that most schools near the Build Alternatives were not analyzed: As noted in Section 3.11.3.3, noise and vibration impacts were evaluated in accordance with the FTA's "Detailed Assessment" guidelines and stationary noise and vibration impacts were evaluated in accordance with the FTA's "General Assessment" guidelines. As detailed in Section 3.11.3.11, the area of potential impact included properties up to 350 feet away where there are no obstructions, and 150 feet where there are obstructions. With the exceptions of the Kipp Raices Academy at 668 S. Atlantic Boulevard and the Arts in Action Community Charter Elementary School, the schools and the Atlantic Park identified by the commenter are not within the area of potential impact and were therefore not individually evaluated in the Recirculated Draft EIR.

The Arts in Action Community Charter Elementary School was evaluated in the impact assessment. As stated in in the Atlantic/Pomona Station Option discussion on page 3.11-20 in Section 3.11.6.1.1, the school is screened by existing structures and the trackwork at the Atlantic/Pomona Station Option site would be below grade and the predicted noise levels at the school would not exceed the threshold of significance.

Regarding potential noise and vibration impacts at the Kipp Raices Academy, Metro requires a number of actions from the Contractor, (mitigation measures MM NOI-1 through MM NOI-15 and project measures PM NOI-1 and PM NOI-2 listed in Section 3.11.7 in Section 3.11, Noise and Vibration, of the Recirculated Draft EIR and as revised in the Final EIR) to assess and reduce noise at sensitive receivers including schools (such as Kipp Raices Academy) to less than significant. These measures include development of a construction noise control plan, a construction noise mitigation plan, a construction vibration control plan, and a construction vibration mitigation plan, as well as specific measures that include, where necessary to meet performance criteria, limiting certain noisy activities such as impact piling where practicable, the use of temporary noise barriers, location of staging areas away from sensitive receivers and routing of construction traffic. As discussed in Responses to Comment A-2-3, A-2-4 and A-2-5, MM NOI-3 and MM NOI-8 have been revised in the Final EIR to clarify that Metro will monitor the effectiveness of noise barriers and shall notify the public, including schools, of construction operations and schedules. Compliance with mitigation measures would be required and it would be responsibility of Metro

and Metro's contractors to ensure this compliance occurs as identified in the Mitigation Monitoring and Reporting Plan required under CEQA. There is no requirement for workers to roll items. Impacts at day care centers along the alignment would be the same as that that of other sensitive receptors, and therefore, impacts would be less than significant with implementation of mitigation.

The institutional land use category is Category 3 of the noise sensitive land use categories identified by the FTA as defined in Table 3.11-2 on page 3.11-3 of the Recirculated Draft EIR. The category identifies a noise metric to be used for noise measurement and assessment and is used in part to determine the FTA severe noise impact criteria for a noise sensitive use. If the FTA severe noise impact criteria is exceeded, a significant impact would occur. The impact assessment for institutional land uses evaluates if the FTA severe noise impact criteria is exceeded at any Category 3 land uses along the alignment.

### Comment I-199-56

SCHOOLS

Since East Los Angeles has more schools within a half mile than any other school, will there be greater impacts to area children? This has not been adequately addressed by the DEIR. East Los Angeles has 8 of the 10 schools within a half mile.

### Response to I-199-56

See Section 3.13.6.1, Public Services and Recreation, of the Recirculated Draft EIR and revised in the Final EIR. As discussed therein, schools were identified within 0.25 mile of the Project to address the potential for any direct physical impacts to facilities or access to such facilities, and to assess the potential for indirect impacts on levels of service if the Project were to induce new population growth to the region. The Project would not impact the performance objectives for the surrounding schools.

### Comment I-199-57

HEALTH RISK ASSESSMENT:

The health risk assessment fails to analyze heat island impacts to residents from new Transit Oriented Development. The health risk assessment fails to analyze air pollution impacts from more high rises and density in the East Los Angeles community, an area with 4 freeways.

### Response to I-199-57

The health risk assessment evaluates the impacts associated with that of the Project. Future development that may occur in the region would be subject to review under CEQA at the time the development is proposed. Further, the comment mischaracterizes the heat island effects in the project area as new influences that would be associated with future development. The project area is already a highly developed urban setting with a high density of impervious surfaces, such as buildings and roads, which absorb and re-emit solar radiation more readily than natural landscapes, thus resulting in heat island effects. Accordingly, heat island effects would influence pollutant dispersion throughout the project area under the existing conditions, the No Build Alternative, and any of the three Build Alternatives. While the Project would not substantially change the existing heat island effects, consistent with Los Angeles County Green Building Code (Title 31), roofing materials for aboveground structures greater than or equal to 25,000 square feet would be constructed to meet cool roof requirements for the reduction of heat island effects.

Existing impervious structures/surfaces that would be replaced with the new structures may not meet the current code requirements for solar reflectance and thermal emittance, and thus a fractional reduction in existing heat island effects may occur.

As described in Section 3.2.6.5 of the Recirculated Draft EIR, toxic air contaminant (TAC) emissions would decrease as a result of the Project relative to the existing conditions. Since the dispersion of emissions under both the existing conditions and future scenarios would be influenced by similar heat island effects, the Recirculated Draft EIR's conclusion that the reduction in TAC emissions would result in a less than significant impact with respect to the exposure of sensitive receptors to a substantial increase in human health risks remains valid.

### Comment I-199-58

The health risk assessment fails to analyze impacts to local children from the boring and movement of contaminated soil. There are many contamination and LUST sites near the build area in East Los Angeles. Additionally, eight schools are located within a half mile. Children and their parents walk near the construction area to get home. Atlantic Park is nearby as well.

### Response to I-199-58

See Response to Comment I-199-48 and Response to Comment I-199-49 regarding hazards and health risk.

### Comment I-199-59

Unfortunately, because our family were sick from Covid and took a vacation during the comment period we were unable to comment as fully and clearly as we would have like to.

Sincerely Clara M. Solis and Clara S Solis

Attachment provided separately. East LA Parking Study. 2021.

### Response to I-199-59

This comment does not pertain to the environmental analysis of the Project and no further response is required. The referenced attachment does not include comments on the Recirculated Draft EIR so no further response is required. The attachment is provided in the original Comment Submission I-199 located in **Appendix A**.

## I-200: Samuel Chen

### Comment I-200-1

I prefer option 1 (to Washington)

### Response to I-200-1

The commenter's support for Alternative 1 is noted.

## I-201: Esther mejia

### Comment I-201-1

What is the transit-dependent polulation mentioned in ES.2.2 it is not quantified What are the eastern LA County transit-oriented community goals listed in ES 2.2

### Response to I-201-1

The commenter asserts that the transit-dependent population was not quantified. See Table 3.12-4 Table 3.12in Section 3.12, Population and Housing, of the Recirculated Draft EIR for demographic information about the persons living in census tracts within a half-mile of the stations along the Project. Per U.S. Census data, approximately 15 percent of people within the census tracts located one half-mile of stations are transit-dependent.

For a list of policy goals under the *Los Angeles County 2035 General Plan* related to transit-dependent communities, see Section 3.3.3 of Appendix K, Land Use and Planning Impacts Report.

### Comment I-201-2

Disappointed that the no project alternative ES.3.2 does not have sufficient information. ES-13 Table ES-02 Summary of Impacts by Environmental Resource lists the no project alternative as Significant and Unavoidable for Green House Gas Emmissions yet this could be avoided with alternative energy sources such has electric buses

### Response to I-201-2

The section and tables in the Executive Summary of the Recirculated Draft EIR referenced by the commenter is a summary of the more detailed information contained in the other chapters of the Recirculated Draft EIR. Information on the No Project Alternative can be found in Chapter 5, Comparison of Alternatives, and by environmental topic in Appendices B through O of the Recirculated Draft EIR. The comment incorrectly infers a significant unavoidable impact would not occur under the No Project if use of alternative energy sources is increased. Under the No Project Alternative, no Project-related improvements would occur. While increased use of alternative energy sources is likely to occur in the future, this occurrence is associated with the future baseline conditions and would occur irrespective of the No Project Alternative. As identified in Appendix H, Climate Change and Greenhouse Gases Impacts Report, Section 5.0 and Section 3.7.4, in Section 3.7, Greenhouse Gas Emissions, the threshold for determining if the Project would have a significant impact relative to GHGs is if it would generate GHG emissions that would have a significant impact on the environment or if it would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As described in Section 5.5 in Chapter 5 and presented in greater detail in Section 9 of Appendix H, Climate Change and Greenhouse Gases Impacts Report, it was determined that the Project is identified as a component of the Southern California Association of Governments' Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, not implementing the Project would conflict with the RTP/SCS, as well as other state, regional and local plans and policies to increase mass transit and reduce use of personal vehicles as a key strategy to reduce GHG emissions. Because the No Project Alternative would not facilitate broader adoption of mass transit or contribute to reducing vehicle miles traveled and the associated reductions in GHG, it would conflict with plans and policies and would result in a significant and unavoidable impact.

### Comment I-201-3

How is the rail powered ? Same with Air quality 13 no impact areas listed.

### Response to I-201-3

Light rail is powered by electricity. The Executive Summary provide a summary table of impacts and mitigation measures. The impact analyses are provided in Chapter 3.0 of the Recirculated Draft EIR for each of the resource topics in Subsection 6. Specifically, Subsection 6 (3.5.6) in Section 3.5, Energy, discusses the operational energy use and potential impacts to energy associated with the Project. Subsection 6 (3.2.6) in Section 3.2, Air Quality, discusses air emissions and the potential impact to air quality associated with the Project.

### Comment I-201-4

ES.5.1 Will the environmentally superior alternative be brought forth as the recommended alternative?

### Response to I-201-4

As described in Section 5.7 of the Recirculated Draft EIR, the environmentally superior is identified to inform decisionmakers as part of the Project approval process; however, Metro is not required by CEQA to select the environmentally superior alternative as the approved project.

### Comment I-201-5

Page 3 4 1 3.4.3.2 no responses have been received to date, why?

### Response to I-201-5

The individuals and organizations likely to have knowledge of or concerns about historical resources who were sent letters have opted not to provide a response.

## I-202: Roman Vazquez

### Comment I-202-1

I fully support the project in the Alternative 1 Washington configuration. I also support the Commerce MSF option as it seems as it will lessen the traffic impacts on Washington Blvd at Garfield Blvd by remaining north of Washington Blvd. The implementation of mitigation measures CUL-1 through 6 will also aid in the impact significants.

### Response to I-202-1

The commenter's support for Alternative 1 is noted.

### Comment I-202-2

However, the draft does not explain clearly why the Commerce MSF needs to be accessed via an aerial guideway. Nor does the draft explain what the restored conditions would be of the acquired land under/adjacent to the spur guideways for both the Commerce and Montebello sites.

### Response to I-202-2

Aerial guideway through this area would span active freight tracks along either side of Garfield. The lead tracks to the Commerce MSF site option would be located northeast of the intersection of Gayhart Street and Washington Boulevard and would extend in an aerial configuration and then transition to at-grade within the MSF site option after crossing Davie Avenue. As noted in Section 3.10, Land Use, of the Recirculated Draft EIR, upon completion of the construction activities, properties acquired for construction activities may be available for joint development or parking facilities subject to standard planning and permitting review processes separate from this environmental review process.

### Comment I-202-3

Considering the number of visual and cultural impacts the public is being asked to comment on, this draft is lacking many visual simulations. Only seven were included along the entire 9 mile route. Please include, at a minimum, visual simulations of the MSF options that include the underground to aerial transitions, as well as their aerial spur guideways.

### Response to I-202-3

The commenter's request for additional visual simulations is noted. The visual simulations that are provided are intended to provide representative examples of the various alignment configurations. Text is provided to describe visual effects at other locations and conditions. The simulations and text description are sufficient in determining if the project would have significant aesthetic impacts pursuant to CEQA.

### Comment I-202-4

Regarding implementation of CUL-4, to hasten possible significant impacts occurring to the historical Dal Rae Restaurant resource, consider the use of a more aesthetically harmonious Overhead Contact System rather that the standard industrial-look poles. With little modification, the standard poles can likely be designed to more closely resemble the post–World War II aesthetic of the Dal Rae sign in color and shape.

### Response to I-202-4

As stated in Section 3.4.6, page 3.4-36, of the Recirculated Draft EIR, the setting of the Dal Rae Restaurant Sign would not be substantially altered by the installation of rail features nearby. Metro will continue to engage with and solicit input from community organizations on the Project's design as it proceeds, contingent upon approval of the project by the Metro Board, through preliminary engineering, final design, and construction. The architectural treatments will be determined during the preliminary engineering and design phase of the Project.

### Comment I-202-5

Perhaps a similar aesthetic treatment can me applied to the OCS in the vicinity of the Atchison, Topeka & Santa Fe Railway Depot as well.

### Response to I-202-5

As stated in Section 3.4.6, page 3.4-35, of the Recirculated Draft EIR, the setting of the Atchison, Topeka & Santa Fe Railway Depot would not be substantially altered by the installation of rail features nearby. The commenter's suggestion for aesthetic design treatments to the proposed overhead catenary system (OCS) are noted. Metro will continue to engage with and solicit input

from community organizations on the Project's design as it proceeds, contingent upon approval of the project by the Metro Board, through preliminary engineering, final design, and construction. The architectural treatments will be determined during the preliminary engineering and design phase of the Project.

## I-203: Clara Solis

### Comment I-203-1

The historical impact analysis missed much in East Los Angeles. Amalia Street has significant properties many of which are still representative of pre-WWII Los Angeles. Properties that have some changes can still be contributing. I submitted another letter but forgot to make a comment on the historical analysis section

### Response to I-203-1

The properties where cultural resource impacts may occur are identified on Area of Potential Effects (APE) maps provided in Attachment A of Appendix E, Cultural Resources Impacts Report, of the Recirculated Draft EIR. The street identified by the commenter, Amalia Street (Amalia Avenue), is located along the underground portion of the alignment. Due to the underground nature of the improvements at this location, no construction impacts or permanent visual impacts to historical resources would occur. Further, Section 3.11.6.2, Table 3.11 14., page 3.11-36, of the Recirculated Draft EIR explains that the vibration impact levels at Amalia Avenue do not exceed the Federal Transit Administration frequent impact criteria.

## I-204: Jay Salazar

### Comment I-204-1

Hello I'm jay Salazar I have been living in the Whittier Santa Fe springs area for 25 years and over the time I have seen lots of traffic and congestion in our area and putting this line in is definitely going to cause a huge back up especially on Washington Blvd. I've seen how the gold line runs near the Montebello sheriff's station and I dread driving home through there at 5 on a weekday. that area get so heavily congested with really no where to go and I can only imagine how that would be on Washington. People avoiding that area is going to make business that run along that new pink line lose customers due to people avoiding the area.

### Response to I-204-1

Regarding congestion, CEQA Guidelines no longer require a level of service analysis to determine significant impacts; see Response to Comment A-8-14 regarding this change. See also Response to Comment I-21-1 regarding traffic impacts. See Response to Comment A-8-21 and Response to Comment B-2-9 regarding concern for local businesses.

### Comment I-204-2

Also I use to ride the metro a lot but over the past 3-5 years I have stopped due to all the rise in crime in the areas that these metro stations are. I'm sure you can't help who uses the services. I have noticed that there have been more law enforcement on board the trains to help protect riders but these metro stations seem to be magnets to crime wether it be violent or drug related crime. I fear that putting one of these stations in our towns is going to have this type of negative impact.

We have seen this on the blue/Gold/green line. Type in stabbing in gold blue or green line in la and there is a lot of stories on there over the years and all these rail lines were built in different areas yet the outcome is the same. Santa Fe springs in the past year has had a huge meth problem. We see these meth heads just walking about our community and there is a small number of them out there currently but we add transportation to a area that it starting to have a problem, it's going to get worse. I never write in to these kinds of things like ever but this new line is going to be the start of many problems to our city and I would really strongly say this is not something I would like in my city. Thank you for your time

### Response to I-204-2

See Response to Comment I-7-3 and A-18-19 regarding crime and safety.

## I-205: Nicholas Gutierrez

### Comment I-205-1

My concerns regarding the Eastside Transit Corridor Phase 2 project are as follows: 1) Nowhere inside the Draft EIR does it adequately address parking for each of the stops. I live in Whittier and believe that the stops and need for parking at each one in Alternative 1 will be detrimental to the surrounding homes and businesses.

### Response to I-205-1

Pursuant to SB 743, adequacy of parking is not a significant impact under CEQA (see Pub. Resources Code, § 21099(b)(3)). As described in Section 2.5.1.2 of Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the Atlantic/Pomona station (relocated/reconfigured), and surface parking would be provided at each of the at-grade stations.

### Comment I-205-2

2) I live off of Washington Boulevard and am concerned with the noise and the amount of traffic the train will cause in Alternative 1 because it is above ground.

### Response to I-205-2

Section 3.11, Noise and Vibration, and Section 3.14, Transportation and Traffic, of the Recirculated Draft EIR provide discussion of the potential impacts to noise and transportation and traffic respectively associated with the Project. As described therein, impacts associated with noise and traffic would be less than significant with incorporation of mitigation. See also Response to Comment I-55-4 regarding noise and Response to Comment I-21-1 regarding traffic.

### Comment I-205-3

I am more in favor of the other alternatives which have more of the train located underground and will be less likely to conflict with traffic and effect the homes in the neighborhoods.

### Response to I-205-3

The commenter's preference for Alternative 2 and Alternative 3 is noted.

### Comment I-205-4

3) I am worried about the crime and homelessness that the train brings and am worried that despite what Metro has done, it has not been enough to adequately deal with the rampant homeless and crime that is evident on the trains.

### Response to I-205-4

See Responses to Comments A-8-19 and I-7-3 regarding crime, security, and people experiencing homelessness.

### Comment I-205-5

The amount of ridership does not justify taking a whole lane away of traffic and will only create more delays for current car drivers which is detrimental environmentally.

### Response to I-205-5

As stated in Section 3.14.6.1.1 of the Recirculated Draft EIR, Alternative 1 is forecasted to increase countywide transit travel by approximately 7,700 new transit trips daily compared to the No Project Alternative, and approximately 15,000 total weekday boardings. As stated in Section 3.14.6.2.1 of the Recirculated Draft EIR, Alternative 1 would result in a reduction of VMT by approximately 10,000 compared to the No Project Alternative. See also Response to Comment I-13-1 regarding ridership and Response to Comment I-10-5 regarding project need.

### Comment I-205-6

4) I do not understand the need for the train, I do not believe the ridership numbers justify the money spent on this project

### Response to I-205-6

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment I-13-1 regarding ridership.

### Comment I-205-7

nor do I believe this will be beneficial to our community because the fact of the matter is that the project will take too long to be built before it is operational and by then the move towards electric buses and vehicles will make the need for the train less necessary.

### Response to I-205-7

See Response to Comment I-10-5 regarding the project need.

### Comment I-205-8

5) I believe that the money for this project would be better spent on electric buses and only focusing on the alternatives which are going underground.

### Response to I-205-8

See Response to Comment I-9-2 regarding project cost. See Response to Comment CO-4-15 regarding the range of alternatives considered.

### Comment I-205-9

6) I am worried with the businesses and Hospitals along Washington Blvd, especially PIH that traffic and emergency vehicles will cause delays.

### Response to I-205-9

PIH Health Whittier Hospital, which includes emergency care services, is located on Washington Boulevard near Lambert Road. The intersection of Washington Boulevard and Lambert Road would be preserved as-is because the alignment curves southward approximately one block west of the intersection and does not impact the intersection. The ingress and egress of emergency vehicles to and from the hospital would remain. See also Response to Comment I-36-1 regarding emergency vehicle response time.

### Comment I-205-10

To reiterate, I believe that the traffic congestion, environmental hazards that come along with the project as noted in the report (such as geological, noise pollution, etc.), pollution, delays, unsafe train crossings, homelessness, as well as the impacts to surrounding homes outweigh any benefit that the construction of Alternative 1 could provide.

### Response to I-205-10

The commenter's opposition to Alternative 1 is noted. The commenter states that impacts associated with Alternative 1 would outweigh the environmental benefits associated with Alternative 1. Section 5.6 in Chapter 5, Comparison of Alternatives, of the Recirculated Draft EIR describes the Build Alternatives and the No Project Alternative and identifies benefits and compares the potential impacts of each. As discussed in Section 5.6 in the Recirculated Draft EIR, Alternatives 1 and 3 would provide the highest level of environmental benefits. Additionally, as discussed in Section 5.7 of the Recirculated Draft EIR, under Section 15126.6(a) of the CEQA Guidelines, an environmentally superior alternative must be identified in order to determine which alternative possesses an overall environmental advantage when compared to all other alternatives evaluated in this Recirculated Draft EIR. Alternatives 1 and 3 with the Montebello MSF site option, with or without the design options, would have similar findings of environmental impacts and mitigation measures. Alternative 3 with the Montebello MSF site option, with or without the design options, would be the environmentally superior alternative as it would result in a lower number of significant and unavoidable impacts compared to Alternatives 1, 2, and 3 with the Commerce MSF site option, and smaller level of environmental effects when compared to Alternative 1 with Montebello MSF site option. Table 5.3 of the Recirculated Draft EIR summarizes the Project Objectives Comparison for the three alternatives. The commenter is also referred to Table ES-2 in the Executive Summary of the Recirculated Draft EIR. This table provides a summary of impact evaluations for all resource topics considered in the Recirculated Draft EIR, including required mitigation measures for potentially significant impacts.

In particular, the commenter is referred to Section 3.2, Air Quality, Section 3.6, Geology, Soils, and Paleontological Resources, Section 3.11, Noise and Vibration, Section 3.13, Public Services and Recreation, Section 3.14, Transportation and Traffic, and Section 3.17, Growth Inducing Impacts, of the Recirculated DEIR for a detailed discussion of impacts related to these resources from operation and construction of the Project. A brief summary of impacts related to these resource topics is provided below:

- Air Quality: As identified in Section 3.2, operation and construction of the Project would result in less than significant impacts on air quality and no mitigation is required.
- Geology, Soils, and Paleontological Resources: As identified in Section 3.6, operation and construction of the Project would result in significant and unavoidable impacts on geology, soils, and paleontological resources and mitigation is required.
- Noise and Vibration: As identified in Section 3.11, operation and construction of the Project would result in less than significant impacts from noise and vibration, with implementation of mitigation.
- Public Services and Recreation: As identified in Section 3.13, operation and construction of the Project would result in less than significant impacts on public services and no mitigation is required.
- Transportation and Traffic: As identified in Section 3.14, operation and construction of the Project would result in less than significant transportation impacts, with implementation of mitigation.
- Growth-Inducing Impacts: As identified in Section 3.17, operation and construction of the Project would result in less than significant growth-inducing impacts and no mitigation is required.

Regarding security and people experiencing homelessness, see Response to Comment A-8-19.

### Comment I-205-11

Sticking to a plan that is entirely underground such as Alternative 3 would have less of a negative overall environmental impact.

### Response to I-205-11

The commenter's support for Alternative 3 is noted. However, it should be clarified that Alternative 2 is fully underground while Alternative 3 includes an aerial configuration and Alternative 3 with the Montebello At-Grade Option includes an at-grade configuration.

## I-206: Madison Gutierrez

### Comment I-206-1

I disagree with the Alternative 1, it is not the best plan and I see it as a detriment in many ways. It will inhibit traffic on a main street like Washington Boulevard and will only cause traffic and delays on an already busy street.

### Response to I-206-1

The commenter's opposition to Alternative 1 is noted. The potential impacts of the Project on transportation and traffic are analyzed in Section 3.14.6 of the Recirculated Draft EIR. Regarding congestion, CEQA Guidelines no longer require a level of service analysis to determine significant impacts; see Response to Comment A-8-14 regarding this change.

### Comment I-206-2

I am worried about the crime it will bring and the danger it will bring to crosswalks because they will be at level grade with the street versus underground.

### Response to I-206-2

See Response to Comment I-36-3 regarding pedestrian safety. See Responses to Comments I-7-3 and A-18-19 regarding crime and security

### Comment I-206-3

It will also negatively effect the businesses in the surrounding areas and will make it more difficult to get to them and park. Parking is also another issue which this EIR does not specifically touch on. The fact that existing businesses will have to be torn down in order to create parking lots for vehicles to take the train seems counterintuitive to wanting to help the environment.

### Response to I-206-3

Pursuant to SB 743, adequacy of parking is not a significant impact under CEQA (see Pub. Resources Code, § 21099(b)(3)). Adequacy of parking is not typically considered under CEQA, however, as described in Section 2.5.1.2 of Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the Atlantic/Pomona station (relocated/reconfigured), and surface parking would be provided at each of the at-grade stations. As identified in PM GRW-1 (Section 3.17.7.1 of the Recirculated Draft EIR), Metro would coordinate with local jurisdictions and Los Angeles County to develop new corridor-wide governance strategies and implement plans, policies, and economic development strategies to transform station areas into equitable, sustainable and safe areas for development in the Project corridor. See also Response to Comment I-189-2 regarding access to businesses.

### Comment I-206-4

Alternative 1 is the most at-grade plan and for that reason it will have the most negative impact on the lives of people.

### Response to I-206-4

The commenter's opposition to Alternative 1 is noted. See Chapter 5 of the Recirculated Draft EIR which compares the potential effects of the Build Alternatives and the No Project Alternative on the physical environment in accordance with CEQA. As described in Section 5.7 and illustrated in Table 5-4, Alternative 3 with the Montebello MSF site option was determined to be the environmentally superior alternative. The No Project Alternative was determined to have the greatest of significant and unavoidable impacts to environmental resources followed by Alternative 2. Alternatives 1 and 3 with the Montebello MSF site option, with or without the design options, would have similar findings of environmental impacts, however more mitigation measures would be required to mitigate impacts.

### Comment I-206-5

This is why I am not in favor of Alternative 1 and would much rather see nothing built, but if a plan must be decided I would go with Alternative 3 because it does most underground.

### Response to I-206-5

The commenter's support for the No Project Alternative or Alternative 3 is noted. However, it should be clarified that all alternatives have the same underground configuration. However Alternative 1 and Alternative 3 also have aerial configurations, and Alternative 1 and Alternative 3 with the Montebello At-Grade Option also have an at-grade configuration.

## I-207: Raul Cuevas

### Comment I-207-1

The only concern I have is at the intersection of Norwalk Blvd. and Washington Blvd. in Santa Fe Springs/West Whittier. Please be aware that area is a high traffic area. Many trucks and school pedestrian traffic.

### Response to I-207-1

The Project would not preclude vehicle or truck access along Washington Boulevard, and left-turn movements would continue to be allowed to and from major cross-streets at signalized intersections, including Norwalk Boulevard, as set forth in project measure PM TRA-1 in Section 3.14.7 of the Recirculated Draft EIR. Signal-protected pedestrian crosswalks would also be provided at Norwalk Boulevard and other signalized intersections. In addition, best practice safety measures would be implemented to minimize potential conflicts including channelization, high visibility curbs between the guideway and roadway to prohibit vehicles from driving onto the tracks, barriers to protect and route pedestrians, ADA-compliant curb ramps, and warning signs. See drawing TS-W-133 of Volume 2, Advanced Conceptual Design, of the Recirculated Draft EIR for the signing and striping plan and drawing TR-W-126 for the traffic signal plan at Norwalk Boulevard.

### Comment I-207-2

please consider elevated light rail or trench light rail options. In my opinion street-level track doesn't make sense. Also, I will address the homeless problem... briefly. Handle it like the city of Long Beach, the city of Culver city, and city of Pasadena. Be more assertive and determine.

### Response to I-207-2

The commenter's preference for aerial or underground configuration is noted. See Response to Comment A-10-5 regarding grade separation. See Response to Comment A-18-19 regarding people experiencing homelessness.

### Comment I-207-3

I support L line/Eastside corridor Phase 2 extension.

### Response to I-207-3

The commenter's support for the Project is noted.

## I-208: Hector Gutierrez

### Comment I-208-1

I am concerned with the noise and the amount of traffic the train will cause in Alternative 1 because it is above ground. I am more in favor of the other alternatives which have more of the train located underground and will be less likely to conflict with traffic and effect the homes in the neighborhoods.

### Response to I-208-1

This comment is similar to Comment I-205-2 and Comment I-205-3. See Response to Comment I-205-2 and Response to Comment I-205-3.

### Comment I-208-2

I am worried about the crime and homelessness that the train brings and am worried that despite what Metro has done, it has not been enough to adequately deal with the rampant homeless and crime that is evident on the trains as well as Greater Los Angeles County.

### Response to I-208-2

The content of this comment is similar to Comment I-205-4. See Response to Comment I-205-4

### Comment I-208-3

The amount of ridership does not justify taking a whole lane away of traffic and will only create more delays for current car drivers

### Response to I-208-3

The content of this comment is similar to Comment I-205-5. See Response to Comment I-205-5.

### Comment I-208-4

Nowhere inside the Draft EIR does it adequately address parking for each of the stops. I live in Whittier and believe that the stops and need for parking at each one in Alternative 1 will be detrimental to the surrounding homes and businesses.

### Response to I-208-4

The content of this comment is similar to Comment I-205-1. See Response to Comment I-205-1.

### Comment I-208-5

Traffic congestion, environmental hazards that come along with the project as noted in the report (such as geological, noise pollution, etc.), pollution, delays, unsafe train crossings, homelessness, as well as the impacts to surrounding homes outweigh any benefit that the construction of Alternative 1 could provide.

### Response to I-208-5

The content of this comment is similar to Comment I-205-10. See Response to Comment I-205-10.

### Comment I-208-6

Sticking to a plan that is entirely underground such as Alternative 3 would have less of a negative overall environmental impact.

### Response to I-208-6

The content of this comment is identical to Comment I-205-11. See Response to Comment I-205-11.

### Comment I-208-7

I disagree with the Alternative 1, it is not the best plan. It will inhibit traffic on a main street like Washington Boulevard and will only cause traffic and delays on an already busy street.

### Response to I-208-7

The content of this comment is similar to Comment I-206-1. See Response to Comment I-206-1.

## I-209: Anonymous

### Comment I-209-1

I am glad that noise is low.

### Response to I-209-1

The comment is noted.

### Comment I-209-2

How will property values be affected? How did the E Line in Santa Monica change noise and surrounding land use?

### Response to I-209-2

See Response to Comment B-2-9 for information on property values. The comment regarding the E Line in Santa Monica does not pertain to the environmental analysis of the Project and no further response is required.

### Comment I-209-3

This is a good project that should be accelarated.

### Response to I-209-3

The commenter's support for the Project is noted.

## I-210: Iquibalan Avila

### Comment I-210-1

Please do not continue with this project. 1. homeless will increase in Whittier. 2. Higher violence to whittier

**Response to I-210-1**

The commenter's opposition to the Project is noted. See Response to Comment A-8-19 and Response to Comment I-7-3 regarding security concerns in terms of homelessness and crime.

**Comment I-210-2**

3. Increase traffic

4. Sound pollution.

**Response to I-210-2**

Section 3.11, Noise and Vibration, and Section 3.14, Transportation and Traffic, of the Recirculated Draft EIR provide discussion of the potential impacts to noise and transportation and traffic respectively associated with the Project. As described therein, impacts associated with noise and traffic would be less than significant with incorporation of mitigation. See also Response to Comment I-55-4 regarding noise and Response to Comment I-21-1 regarding traffic.

## I-211: Carmen Cuevas

**Comment I-211-1**

Please, work with the city of Whittier and City of Santa fe Springs and the West Whittier/ Los Nietos community leader to address the homeless problem or potential future problems on the Eastside Transit Corridor phase. It seems some local residents fear a East skid row. HOMELESS PROBLEM ON THE TRAIN/LIGHT RAIL SHOUDN'T BE THE REASON NOT TO BUILD THE EASTSIDE TRANSIT CORRIDOR PHASE 2.

**Response to I-211-1**

See Response to Comment A-8-19 regarding people experiencing homelessness.

**Comment I-211-2**

I support the extension of the L line/eastside transit corridor phase 2... PLEASE BUILD IT ASAP.

**Response to I-211-2**

The commenter's support for the Project is noted.

## I-212: Denise Gutierrez

**Comment I-212-1**

My concerns regarding the Eastside Transit Corridor Phase 2 project are as follows:

1) Nowhere inside the Draft EIR does it adequately address parking for each of the stops. I live in Whittier and believe that the stops and need for parking at each one in Alternative 1 will be detrimental to the surrounding homes and businesses.

### Response to I-212-1

The content of this comment is identical to Comment I-205-1. See Response to Comment I-205-1.

### Comment I-212-2

2) I live off of Washington Boulevard and I am concerned with the noise and the amount of traffic the train will cause in Alternative 1 because it is above ground.

### Response to I-212-2

The content of this comment is identical to Comment I-205-2. See Response to Comment I-205-2.

### Comment I-212-3

I am more in favor of the other alternatives which have more of the train located underground and will be less likely to conflict with traffic and effect the homes in the neighborhoods.

### Response to I-212-3

The content of this comment is identical to Comment I-205-3. See Response to Comment I-205-3.

### Comment I-212-4

3) I am worried about the crime and homelessness that the train brings and am worried that despite what Metro has done, it has not been enough to adequately deal with the rampant homeless and crime that is evident on the trains as well as Greater Los Angeles County.

### Response to I-212-4

The content of this comment is similar to Comment I-205-4. See Response to Comment I-205-4.

### Comment I-212-5

The amount of ridership does not justify taking a whole lane away of traffic and will only create more delays for current car drivers which is detrimental environmentally.

### Response to I-212-5

The content of this comment is identical to Comment I-205-5. See Response to Comment I-205-5.

### Comment I-212-6

4) I do not understand the need for the train, I do not believe the ridership numbers justify the money spent on this project nor do I believe this will be beneficial to our community because the fact of the matter is that the project will take too long to be built before it is operational and by then the move towards electric buses and vehicles will make the need for the train less necessary.

### Response to I-212-6

The content of this comment is identical to Comment I-205-6 and Comment I-205-7. See Response to Comment I-205-6 and Comment I-205-7.

### Comment I-212-7

5) I believe that the money for this project would be better spent on electric buses and only focusing on the alternatives which are going underground.

### Response to I-212-7

The content of this comment is identical to Comment I-205-8. See Response to Comment I-205-8.

### Comment I-212-8

6) I am worried with the businesses and Hospitals along Washington Blvd, especially PIH that traffic and emergency vehicles will cause delays.

### Response to I-212-8

The content of this comment is identical to Comment I-205-9. See Response to Comment I-205-9.

### Comment I-212-9

7) Nowhere in the plan did it really discuss how noise pollution was going to be reduced, I do not believe the measures that will be taken will be effective enough to really make a difference.

### Response to I-212-9

Section 3.11, Noise and Vibration, of the Recirculated Draft EIR, presents mitigation measures for construction and operation of the Project (see mitigation measures MM NOI-1 through MM NOI-11 in Section 3.11.7.2 of the Recirculated Draft EIR; MM NOI-3 and MM NOI-8 have been revised in the Final EIR). As described in Section 3.11.6, these measures would reduce impacts to less than significant. The commenter asserts that they do not believe measures would be effective enough to make a difference but does not provide evidence to support this assertion.

### Comment I-212-10

8) The impact of the train that it would divert traffic into neighborhoods from Washington Blvd. into neighborhoods North of Washington creating more traffic, especially in residential streets. It would divert of traffic into neighborhoods east of Norwalk Blvd., South of Beverly Blvd., North of Whittier Blvd., and west of Pickering.

### Response to I-212-10

As discussed in Section 3.14.6.1, Alternative 1 would not preclude vehicle or truck access along Washington Boulevard, and left-turn movements would continue to be allowed to and from major cross-streets (e.g., Garfield Avenue, Greenwood Avenue) at signalized intersections as identified in PM TRA-1 (Section 3.14.7.1). In addition, parallel east–west routes (e.g., Telegraph Road, Olympic Boulevard, Whittier Boulevard) would continue to serve as alternatives to Washington Boulevard, providing additional connections to and from the regional freeway network. See also Response to Comment I-189-2.

### Comment I-212-11

9) Would create intractable and intolerable traffic and noise problems for Whittier residents, especially those like myself who live near Washington Blvd. The train would create traffic jams on Washington Boulevard as well as lead to more drivers taking Whittier Blvd. as an alternative.

### Response to I-212-11

See Response to Comment I-212-10 and Response to Comment I-21-1 regarding traffic. See Response to Comment I-212-9 and I-55-4 regarding noise.

### Comment I-212-12

10) I am really concerned that this train will destroy many small and local businesses on Washington from the 605 to Lambert, and on Lambert Ave in Whittier, and businesses on the streets off of Washington Ave.

### Response to I-212-12

See Response to Comment A-8-21 regarding small businesses.

### Comment I-212-13

I disagree with the Alternative 1, it is not the best plan and I see it as not only the least environmentally superior option but also the least practical. It will inhibit traffic on a main street like Washington Boulevard and will only cause traffic and delays on an already busy street.

### Response to I-212-13

The content of this comment is similar to Comment I-206-2. See Response to Comment I-206-2. See also Response to Comment I-206-4 regarding a comparison of alternatives.

### Comment I-212-14

I am worried about the crime it will bring and the danger it will bring to crosswalks because they will be at level grade with the street versus underground.

### Response to I-212-14

The content of this comment is identical to Comment I-206-2. See Response to Comment I-206-2.

### Comment I-212-15

It will also negatively affect the businesses in the surrounding areas and will make it more difficult to get to them and park. Parking is also another issue which this EIR does not specifically touch on. The fact that existing businesses will have to be torn down in order to create parking lots for vehicles to take the train seems counterintuitive to wanting to help the environment.

### Response to I-212-15

The content of this comment is similar to Comment I-206-3. See Response to Comment I-206-3.

### Comment I-212-16

Alternative 1 is the most at-grade plan and for that reason it will have the most negative impact on the lives of people. This is why I am not in favor of Alternative 1 and would much rather see nothing built and those funds spent on upgrading the fleet of Metro to Electric/Gas Powered Vehicles which will be instantly more beneficial environmentally than a plan that will not be ready for a minimum of 13 years from now.

### Response to I-212-16

A portion of this comment is identical to Comment I-206-4. See Response to Comment I-206-4 regarding a comparison of alternatives. See Response to Comment I-9-2 regarding the project cost. See Response to Comment CO-4-15 regarding the range of alternatives.

### Comment I-212-17

To finish off, I believe that the traffic congestion, environmental hazards that come along with the project as noted in the report (such as geological, noise pollution, etc.), pollution, delays, unsafe train crossings, homelessness, as well as the impacts to surrounding homes outweigh any benefit that the construction of Alternative 1 could provide.

### Response to I-212-17

The content of this comment is similar to Comment I-205-10. See Response to Comment I-205-10.

### Comment I-212-18

Sticking to a plan that is entirely underground such as Alternative 3 would have less of a negative overall environmental impact and the impact of surrounding homes and families.

### Response to I-212-18

The content of this comment is identical to Comment I-205-11. See Response to Comment I-205-11.

## I-213: Ron Mukai

### Comment I-213-1

Hello all, my name is Ron Mukai and I'm a property owner and business leader here in East LA. I was also a former member of the gold line RAC and was very involved with the MTA during that time. I fundamentally agree with Mr. Torres' letter. I would also add the additional comment that the MTA has a horrible reputation in East LA and the community does not trust them to do the right thing in the community's best interest. I, personally, have been lied to and misled by the MTA and i was a person deeply involved in these matters. The burden is on the MTA to overcome that stigma, to adequately inform the public and to build the best possible project for the community. The MTAs structure fundamentally lacks real accountability, so earlier mistakes can easily be blamed on the former team leaders and the community never really knows who is taking real responsibility. These are harsh accusations but I stand by each of them, as they are based on personal, ongoing experience with the MTA staff. I trust that the local political leaders will actually hold them accountable and not let them push through another mediocre project. I am happy to meet or answer any questions you may have. Ron Mukai

### Response to I-213-1

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues. Regarding the letter from Mr. Torres, see Responses to Comment CO-9-1 through CO-9-3.

## I-214: Sandra Parra

### Comment I-214-1

As an ELA resident, I concur with Eddie Torres that there should be transparency. Community members who this project would most impact should be able to voice their opinions, and county officials should not dismiss their concerns and limit their time to speak in meetings. I look forward to working with the community to address this issue.

### Response to I-214-1

During the 60-day public comment period, Metro accepted comment submissions via the project website, email, U.S. mail, oral comments submitted via voicemail, and written and oral comments provided at public hearings or other public settings. All comments received on the Recirculated Draft EIR receive a response in the Final EIR and are provided to decision-makers for their review and consideration prior to taking any action on the Project. Regarding limits on speaking time at public hearings and public meetings, the limits are provided so that all attendees have an opportunity to speak within the scheduled meeting time. If the speaking time allocated was not sufficient, as stated above, additional methods for submitting comments on the Recirculated Draft EIR were provided.

## I-215: Arturo Hay

### Comment I-215-1

Okay. Great. First of all, thank you. I appreciate this investment in the East Side. I want to make it quick, but I wanted to note that I've looked through the documentation in the previous EIRs and I have not found any information regarding an alternative to build this line along the Union Pacific right-of-way where the Montebello Metrolink currently is servicing. There's about 50 to 60 extra feet of right-of-way along the side of the rails that could easily fit a station. You could still have a Citadel station that would be adjacent to the Citadel, and you wouldn't require a subway or having to interrupt traffic and community members on Washington Boulevard. This alignment will go closer to population centers and Commerce, East LA along Garfield Avenue, closer to Downtown Montebello and closer to the Whittier Boulevard alignment and Pico Rivera. And it would save a lot of money, which, you know, this seems like a lot of an investment specifically to put the subway portion of the rail in an empty area where the Citadel has parking lots and there's warehouses. It will also be adjacent to many potential properties that could be used for maintenance facility without having a lot of the issues the current facility locations will be located. So, again, I'd just like to advocate to put the rail line along the Union Pacific tracks that are south of the Ferguson Avenue and north of Washington Boulevard. Thank you.

### Response to I-215-1

Constructing light rail tracks along the existing Union Pacific railroad is not a feasible alternative. There is insufficient area within the existing railroad ROW to accommodate new light rail tracks including an overhead catenary system while still providing an adequate safety buffer from the existing heavy rail track. Further, use of this land would require a land purchase or easement from Union Pacific Railroad Company, which would require further coordination and approval.

See also Response to Comment CO-4-15 regarding the range of alternatives that have been considered.

## I-216: Bricia Satello

### Comment I-216-1

Absolutely. My name is Bricia Satello, and I live in Montebello – south Montebello. So I am near one of the stations that you are proposing. So I'm not necessarily opposed to having a train as I believe that transportation is very crucial; however, I have to tell you that some of the points that have been brought up are some of the points that I want to bring up for sure. So having the train come down from East LA underground is great. I think that's great. You know, we reduce some of the traffic that would have been on there anyways, and it's safe; however, when you come up to Commerce, you put it up on top. I don't live in Commerce, but if I were a resident, I may have an opinion on that.

### Response to I-216-1

The commenter's support of an underground configuration is noted.

### Comment I-216-2

I do live in Montebello. And bringing it grade level, it's just -- to me, it almost seems like we're considered second to a different city. I have no idea why you didn't decide to go underground as well, especially when you have children crossing from one street to another in the only place that there's going to be a public elementary. And that is ongoing with where you propose to actually have a station. That is very crucial because I can just see accidents happen.

### Response to I-216-2

See Response to Comment A-10-5 regarding grade separation. See Response to Comment I-36-3 regarding pedestrian safety.

### Comment I-216-3

You did the same thing in Boyle Heights where you had no rail when you first put it in. And even with rail, that seemed still to be a very dangerous section. So if you were to go underground, I promise you that I will walk around and try to convince my neighbors that this is a good project; however, I want you to consider that.

### Response to I-216-3

The commenter's support for an underground alignment is noted. See Response to Comment I-36-3 regarding safety of the at-grade alignment.

## I-217: D K

### Comment I-217-1

From the Whittier Daily News, recent article, even the line going to Whittier with the Montebello site instead of Commerce has problems according to the report. It has many mitigation measures to address, noise and vibration impacts applied to 70 percent of the receivers compared to 29 percent of receivers, construction impacts associated with rerouting transit, traffic, bicycle and pedestrian facilities. Given the greater number of mitigation measures, the route to Whittier option would not be considered the environmentally superior alternative, the report said. On that,

I will say this can – we can attempt to stop this by valid measure if this goes forward in Whittier, which is what we will do if it does.

### Response to I-217-1

The commenter's opposition to Alternative 1 is noted. As clarification, the comment incorrectly states that mitigation measures apply to 70 percent of receivers under Alternative 1 and 29 percent under Alternative 3. The numbers "70" and "29" are the numbers of sensitive receptors that would be impacted and are not percentages. As stated on page 5-29 in Chapter 5 of the Recirculated Draft EIR, "mitigation measures to address noise and vibration impacts apply to 70 sensitive receivers compared to 29 sensitive receivers under Alternative 3..." This is because Alternative 1 is the longest alignment. As stated on page 5-9, "...while many of the same mitigation measures apply to both Alternative 1 and 3 and reduce impacts to less than significant, there is a greater number of properties and public rights-of-way with impacts that must be mitigated under Alternative 1." As noted in that statement, all noise and vibration impacts and construction traffic impacts under Alternative 1 (as with Alternative 2 and 3) would be reduced to less than significant with implementation of mitigation.

Regarding the commenter's suggestion that because Alternative 1 is not the environmentally preferred alternative, this Alternative should not be carried forward, as described in Section 5.7 of the Recirculated Draft EIR, the environmentally superior is identified to inform decisionmakers as part of the Project approval process; however, the Metro Board of Directors is not required by CEQA to select the environmentally superior alternative as the locally approved project. Also see Response to Comment A-8-6 regarding the selection of the environmentally preferred alternative.

### Comment I-217-2

Number three, homelessness and crime would decrease dramatically. 5,700 homeless ride the Metro today according to Sheriff Villanueva.

### Response to I-217-2

See Response to Comment A-8-19 regarding security concerns and people experiencing homelessness and see Response to Comment I-7-3 regarding crime.

### Comment I-217-3

The 2035 gas vehicle ban, which you can Google, is the gas vehicle ban planned by Newsome, would be disastrous. It's interesting that the end service date for the gold line to Whittier or whatever alternative you choose is 2035. I believe that this plan is to create riders by this ban, not that anyone would be riding this gold line. Nobody is going to be riding it. The Atlantic project proves that. This would destroy Whittier's quality of life.

### Response to I-217-3

The commenter's statement about the gas ban does not pertain to the environmental analysis in the Recirculated Draft EIR. For clarification, 2035 is the year that revenue service is anticipated to begin. This date is based on the anticipated design and construction schedule for the project based on availability of funding. Regarding environmental impacts of the Project, see Response to Comment I-4-3. Regarding ridership, see Response to Comment I-13-1.

## I-218: Edmund Veloz

### Comment I-218-1

I'm Edmond Veloz, V-E-L-O-Z. Tonight, we're talking about public transportation, the word "public." Now, in front of me here, I have a page from a 2019 public meeting that took place in Whittier, and these are the very words of a Cevallos, the project manager, and she was told to say this according by the EMTA. And these are from their transcripts. It says, "So all these elements need to go through the public review process and the environmental process down to when we identify the locally preferred alternative." So this is currently the purpose and need of the project. Again, we're soliciting input to ensure that that this purpose and need meets the community's needs and concerns.

### Response to I-218-1

This comment is similar to Comment I-271-1. See Response to Comment I-271-1.

### Comment I-218-2

I have here 1,550 signatures for the locally preferred alternative, which is the environmentally superb alternative and it is for the TSM alternative, transportation system management alternative. The Metro has no kind of support anything close to this, and we're advocating the use of electric buses instead of the light rail.

### Response to I-218-2

The commenter's statement referring to 1,550 signatures, may be referring to a petition submitted as part of Comment Submission I-234. See Response to Comments I-234-1 through I-234-19.

See Response to Comment I-62-1 regarding the TSM Alternative.

The Recirculated Draft EIR identifies Alternative 3 as the environmentally superior alternative. See Response to Comment A-8-6 regarding the selection of the environmentally superior alternative.

### Comment I-218-3

It'll cost 1/100th of the cost and it'll be much more efficient, a much better project and something that the public will definitely use.

### Response to I-218-3

See Response to Comment I-9-2 regarding the project cost.

## I-219: Esther Celiz

### Comment I-219-1

Hello. My name is Esther Celiz and I live here in Pico Rivera. I'm very against this project. During this meeting, none of the speakers mentioned Pico Rivera. Pico Rivera will be affected, because it comes down -- this train will come down Washington. So once it passes Bluff to Washington, you're going to hit our homes on Paramount. You're going to hit our businesses that have been very hard hit during the COVID, and now they're going to be hit again with construction on Washington.

### Response to I-219-1

As explained in Section 3.12.6.2 of the Recirculated Draft EIR, operation of Alternative 1 would occur within the transportation ROW and at the new stations. Under Alternative 1, no acquisition of residential structures would occur; therefore, no people or housing would be displaced. See Response to Comment A-8-21 regarding concerns over impacts to small businesses.

### Comment I-219-2

You will have a station on Washington and Rosemead that will affect our children and crossing on Passens and Washington where our children, over 3,000, will cross from school to El Rancho High School daily.

### Response to I-219-2

See Response to Comment I-55-2 regarding school children crossing at the intersection of Washington Boulevard and Passons Boulevard, and Response to Comment I-170-1 regarding the assertion that 3,000 students will cross Washington Boulevard on Passons Boulevard.

### Comment I-219-3

And you will have this train coming down Washington Boulevard. We have homes on Washington all the way down to the 605 freeway underpass. You have homes there. What are we going to do with that? What's going to happen to the street as all the construction is going on?

### Response to I-219-3

As discussed in Section 3.12.6.2, Population and Housing, of the Recirculated Draft EIR, the Project would not require the acquisition of residential structures; therefore, no people or housing would be displaced. See Appendix P, Construction Impacts Report, of the Recirculated Draft EIR for a description of potential impacts from construction of the Project. See also Response to Comment I-47-2 regarding construction traffic.

### Comment I-219-4

What's the safety issues, environmental issues? It's very dangerous to have this train come down for the sake of our children and the residents that live on that street.

### Response to I-219-4

See Response to Comment I-36-3 regarding pedestrian safety. See also Response to Comment I-4-3 regarding environmental issues addressed in the Recirculated Draft EIR.

### Comment I-219-5

I also would like to ask you to please extend the deadline. You have August 29th. You look at the books we have here, and they are huge. Please extend it another two months. At least give us to November 1st for the cities to look at this, because we do not want this coming into our city. Thank you.

### Response to I-219-5

The commenter's opposition to the Project is noted. Regarding the request for an extension of the public comment period for the Recirculated Draft EIR, see Response to Comment CO-5-1.

## I-220: Jesse Garcia

### Comment I-220-1

Okay. Jesse Garcia, 90640. As I mentioned at the last meeting and everybody keeps mentioning these $3 billion, everybody keeps forgetting in 2029, you're not going to have 3 billion. You may have it on paper, but you're actually going to have 2.5 billion. Inflation is going to already eat you. So you're already in the red, okay? When I broke everything down, this is going to be 52 years just to pay back $3 billion.

### Response to I-220-1

See Response to Comment I-9-2 regarding the project cost.

### Comment I-220-2

And we know we're not going to raise the ridership. Since the last meeting, I've been going up and down the boulevard during the weekday when I come home. Even the buses that run there right now don't have the audience you guys are looking for.

### Response to I-220-2

See Response to Comment I-13-1 regarding ridership.

### Comment I-220-3

Mr. Dutra, he's in it for himself. You can tell right off the bat. He's the only happy camper. The other folks who are for it, you guys have never really been involved in a mess. Once you see that mess going down Washington, good luck. So be careful what you wish for.

### Response to I-220-3

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment I-220-4

The other thing I'm looking at here is the video you keep presenting when this opens up, it's a bit misleading because you show Whittier Boulevard. This thing is not going down Whittier Boulevard. If you're going to redo this video or you're going to do it, do it right. Show it going down Atlantic and through Washington. Why do you keep showing Slauson? Why do you keep showing Beverly Boulevard?

### Response to I-220-4

The commenter may be referring to a video titled Eastside Transit Corridor Phase 2 published in 2019. The purpose of the 2019 video was to provide a comprehensive overview of the project area, including major roadways, local parks, small businesses, civic centers, and recognizable landmarks. While the video may feature areas where the Project would not operate, it was intended to demonstrate the potential impact and benefits of the Project on the surrounding area. The inclusion of various locations, even those not along the specific alignment of the Project, aims to provide a holistic view of how the Project could enhance overall accessibility and connectivity in the area. A more recent video that explains the project alignment and shows the three alternatives

studied in the Recirculated Draft EIR is available on Metro's storymap website for the Project (https://storymaps.arcgis.com/stories/f609c050ef0e405e995c195d3cb8449d).

### Comment I-220-5

Actually, Beverly Boulevard would be the best place for this track to go. It would hook up Rio Hondo and –

### Response to I-220-5

As discussed in Recirculated Draft EIR Appendix T, Alternatives Withdrawn from Further Consideration, the evaluation and screening of concepts, engineering and environmental refinements, and decisions to withdraw alternatives from consideration has a long history in the development of the Project including withdrawn alternatives on Beverly Boulevard. See also Response to Comment I-1-4 and CO-4-15.

### Response to I-222-3

The commenter states that the Project would create environmental noise, pollution and that trembling would devastate their home and their neighbor's homes. However, this is not the case. Regarding noise and vibration, see Response to Comment I-55-4. See also Section 3.2, Air Quality, of the Recirculated Draft EIR, which analyzes the impacts of operation and construction of the Project on air pollution and sensitive receptors. As identified in Section 3.2, operation and construction of the Project would result in less than significant impacts on air quality and no mitigation is required.

## I-221: Jiu Yoon

### Comment I-221-1

My name is Jiu Yoon, ZIP code 90640. I work at a -- on a business off of Washington and Greenwood. And like many of the residents and people who work there have already stated, we are very concerned about why the Metro is so adamant about running this line across Washington when we have Old Dominion right there. We have recycling centers and other construction sites going out with containers and huge, big rigs going in and out. And the Metro and MTA are saying that they'll mitigate traffic as much as possible when it's a nightmare already with three lanes each way. Like the previous resident already said, it just seems like a huge pie in the sky. It seems completely unfeasible. Hard to imagine how that's done.

### Response to I-221-1

See Response to Comment I-21-1 regarding traffic congestion. See Response to Comment CO-4-15 regarding the range of alternatives considered.

### Comment I-221-2

The Alternative 2 with the maintenance site off of -- behind Vail and Washington next to that church also seems completely unfeasible for the very same reasons as we have the trash echo or whatever, like literally right off of Vail going in and out every day with several containers as well in the back. It's just -- it's really baffling and completely really tone deaf with people who have never experienced what it's like traveling on Washington. Thank you.

### Response to I-221-2

The commenter's opposition to Alternative 2 and the Commerce MSF site option is noted. See Response to Comment I-21-1 and I-189-2 regarding traffic and access to businesses.

## I-222: Jorge Martinez

### Comment I-222-1

Hi. My name is Jorge Martinez, 90660 resident. We all have seen how these at-grade level Metro lines have been brought environmentally, destroying single-family residents. So we're at this street that connected Slauson to Rex Road -- got cut off due to all the train crossing accidents and deaths in the past. How can this not be a difference? How can you honestly say our kids will be safe walking to El Rancho High School crossing Washington Boulevard, crossing Lacaline Avenue into our high school and middle schools?

### Response to I-222-1

See Response to Comment I-36-3 regarding pedestrian safety. See also Response to Comment I-4-3 regarding the environmental impacts addressed in Recirculated Draft EIR.

### Comment I-222-2

My family and local community are not in favor of the proposed gold line extension. I live off Lindsay Avenue in Washington Boulevard.

### Response to I-222-2

The commenter's opposition to the Project is noted.

### Comment I-222-3

There are environmental noise, pollution. Trembling will just devastate my home and my surrounding neighbors.

### Comment I-222-4

The only way -- the only entrance to my home is northbound through Lindsay Avenue off Washington Boulevard. If the Metro goes through Washington Boulevard, my entrance will be entirely cut off. Unless this train goes underground through Pico Rivera, as a registered voter, I will make it my duty to support any recall or vote out any public official who was in favor of this project.

### Response to I-222-4

The commenter's opposition to the Project is noted. See Response to Comment I-189-2 regarding vehicle movement at unsignalized intersections.

## I-223: Jorge Martinez

### Comment I-223-1

Hello. My name is Jorge Martinez. I looked online and I found a figure for this project, the gold line, 6.5 billion. What a waste of money. For less than $50,000 -- I mean, $50 million, we can have electric buses that run on the boulevard every 15 minutes and have the fare subsidized, too.

### Response to I-223-1

See Response to Comment I-9-2 regarding the project cost.

### Comment I-223-2

And then why are they forcing trains on us when according to Metro data in February 2020, the agency reported an estimated average of almost 1.2 systemwide riders each weekday. Guess what? The buses take over the population. They're the preferred alternative. 871,000 took the bus. 321,000 were on the rails. And transit ridership is also a serious decline. And this is looking at Metro's old data and others that are available online.

### Response to I-223-2

It is understood that the commenter means to state that the weekday systemwide ridership (bus and rail) in February 2020 was estimated at almost 1.2 million riders. See Response to Comment I-13-1 regarding transit ridership and Response to Comment I-62-1 regarding the selection of alternatives. See also Response to Comment I-10-5 regarding the project need.

### Comment I-223-3

Better railroad administration statistics for 2021 show that highway rail crossings are more deadly in collisions in California between cars and trains. California ranks number two in collisions in the United States, and we will have at least four of them -- Greenwood Avenue, Rosemead Boulevard, Norwalk Boulevard and Lambert Road. These are at-grade. Everybody is on the same level -- pedestrians, cars, trucks, trains. They're dangerous. Thank you.

### Response to I-223-3

The Project would integrate measures to maximize safety for the surrounding communities. As described in Chapter 3.14.6.3 of the Recirculated Draft EIR, the Project would be designed, constructed, and operated per applicable State, Metro, and city design criteria and standards, including adherence to design codes and standards such as the California Division of Occupational Safety and Health Administration (Cal/OSHA), California Public Utilities Commission (CPUC), California Manual of Uniform Traffic Control Devices (CA MUTCD), and Metro safety and security programs and standards (i.e., MRDC and Metro Systemwide Station Design Standards Policy). Stations and grade crossings would be designed in accordance with MRDC, including Fire/Life Safety Design Criteria, to ensure safety and minimize potential hazards at all locations, as set forth in PM TRA-1. There would be no impact from the underground segments. For at-grade and aerial segments, station platforms would be located in the median of the roadway and would be accessible from signalized crosswalks. As set forth in PM TRA-1, best practice safety measures would be implemented to minimize potential conflicts including mid-block crosswalks, signal-protected pedestrian movements, channelization, high visibility curbs between the guideway and roadway to prohibit vehicles from driving onto the tracks, barriers to

protect and route pedestrians, ADA-compliant curb ramps, and warning signs to provide for convenient and safe access to station platforms.

## I-224: Linda Palacios

### Comment I-224-1

Hi. Thank you for your presentation. My name is Linda Palacios. I want to know why Metro is insisting on building this 5 billion subway to the Citadel Mall. Is this really the best and highest priority transit solution for the East Side? You know, Metro's own numbers say only 4100 people will ride the subway, which essentially equates to $1.5 million per rider. Metro has packed buses that have a lot more riders and you're making them ride slow buses on congested streets so you can prioritize this 5 billion subway to the Citadel. We know that Washington Boulevard buses are nearly empty and so is the current East Side gold line on Third Street. Again, Metro's own numbers show that it's lowest ridership segment in the system with two stations that barely serve a few hundred boardings each day. This is not the right solution for transportation in this area, and Metro definitely owes it to the public to review how low the project benefits are compared to this incredibly high cost. Ultimately, a $5 billion subway makes no sense, and we deserve a lot more transit service. Thank you.

### Response to I-224-1

Regarding the project cost, see Response to Comment I-9-2. Regarding the project need, see Response to Comment I-10-5. Regarding ridership, see Response to Comment I-13-1. Regarding the commenter's characterization of the Project as a subway to the Citadel Outlets, see Response to Comment I-50-1.

## I-225: Marina Martinez

### Comment I-225-1

My name is Marina Martinez and I'm a resident of Pico Rivera. And I'm opposed to the gold line, specifically the alternative coming down Washington and Lambert. This is a $3 billion train to nowhere. I don't know of anybody who would want to take the train down to its terminus, which is the hospital. And, you know, as far as the shops around that route, you know, it's not going to attract ridership that Metro is looking for. And that's been the problem with the gold line through – especially coming in through -- which I've seen coming in through the East Los Angeles area, coming down 3rd. I rarely see any car full. I see at the most 3 or 6 or 12 people, not even that. So it's a $3 billion debacle. It's a cash cow for I'm sure some people will benefit financially from it, but certainly not the residents or the people living along that route, which I do.

### Response to I-225-1

The commenter's opposition to Alternative 1 is noted. Regarding the project cost, see Response to Comment I-9-2. See also Response to Comment I-10-5 and Response to Comment I-50-1 regarding project need and activity centers served by the Project. Regarding ridership, see Response to Comment I-13-1.

### Comment I-225-2

I live about four or five blocks from Washington Boulevard and Rosemead. So I know I'm going to be impacted with noise, with pollution for seven years at least, and I'm not looking forward to that.

### Response to I-225-2

See Response to Comment I-169-4 regarding the analysis of noise and air quality impacts in the Recirculated Draft EIR. See also Response to Comment I-199-55 regarding construction noise.

### Comment I-225-3

And I know they said, oh, we're going to coordinate with the local law enforcement and, you know, traffic and all that. That's a lot of pie in the sky. That's a lot of pie in the sky. I'm sorry.

### Response to I-225-3

Metro has regular and consistent coordination with local law enforcement, including in the development of operation plans and providing appropriate public safety and security across the Metro system. As described in Section 3.13, Public Services, in the Recirculated Draft EIR, policing of Metro facilities is shared between Los Angeles County Sheriff's Department (LASD), Los Angeles Police Department (LAPD), and Long Beach Police Department (LBPD). The LASD would handle law enforcement along the Project alignment. Further, Project measure PM TRA-1 on pages 3.14-46 and 3.14-47 of the Recirculated Draft EIR requires Metro to coordinate with local fire and police protection services to preserve emergency access during construction and PM PSR-1 on page 3.13-26 requires the contractor to coordinate with fire and police protection officials to ensure that access for police and fire protection services is maintained during operations. Metro shall be included in all correspondence with third parties.

## I-226: Maude Manji

### Comment I-226-1

Hi. My name is Maude Manji. I'm a resident of Whittier 90602. Really excited for this project. Thank you, Metro, for bringing this project. You know, I would say the option that brings this the fastest in one phase, that's the option I support. You know, this is really a project we need. Nobody likes being stuck on the freeway going all the way to downtown. This is just really going to make my life easier. It's going to make my wife's life a lot a easier. We're really excited to have this project. You know, I was in south Pasadena for a while and, you know, they had the gold line down there. I would just go down to Downtown. Now I'm excited to be a homeowner in Whittier and to take this train down to Downtown and even hopefully down all the way to Santa Monica and the beach. So I'm just very excited for the project.

### Response to I-226-1

The commenter's support for Alternative 1 is noted.

### Comment I-226-2

The one thing I just want to add is I really hope there's a consideration of making an extension to Uptown, because that's really where I think a lot of businesses are, where a lot of folks can utilize this. And there's a lot of density in Uptown. For me, right now, if I were to walk to the station, it's like a 25-minute walk. It's a little bit selfish of me as well. I'd like if it's Uptown, that's more of a 10

or 15-minute walk for me. That's a little bit selfish, but I feel like a lot of the density, a lot of the apartment buildings are going to be in Uptown. So I'm just really hoping that's considered as well, but overall excited for this project. Thank you to the mayor of Whittier and to all the Metro board who brought this forward, and I hope we get this as soon as possible. So thank you again. Thank you to the staff as well. Thank you for putting the hearing together.

### Response to I-226-2

See Response to Comment I-1-4 and Comment CO-4-15 regarding the range of alternatives to the Project that have been considered, including a direct route to Uptown Whittier.

## I-227: Mike Martinez

### Comment I-227-1

Mike Martinez, ZIP code 90022, East LA resident for eight years who's been living in front of the gold line -- existing gold line on Third Street. I really don't have to be here because our extension is going to be all run underground through Atlantic. I'm looking out for more the residents after East LA. Don't let them build it above ground. It is not good. I'll tell you why. Environmental report, 1,012 pages long. Section 61. -- 6.9.2.3, the outreach, the outreach was supposed to – including banners and electronic signs down the corridors that they're going to build. I have not seen one sign, so they failed on that.

### Response to I-227-1

The public comments received and responses to those comments are part of the Final EIR and will be taken into consideration by the decision-makers when considering certification of the Final EIR. Regarding public outreach conducted for the Recirculated Draft EIR, see Response to Comment I-161-3. See also Response to Comment I-193-1 regarding electronic signs and banners.

### Comment I-227-2

There's going to be detour routes on Telegraph, Olympic, Whittier, and possibly Slauson. When they're building this thing, a lot of noise, a lot of dust.

### Response to I-227-2

Section 3.2, Air Quality, of the Recirculated Draft EIR provides analysis of potential air quality impacts in association with dust particles during construction and operations. Section 3.11, Noise and Vibration, of the Recirculated Draft EIR provides analysis of potential vibration impacts associated with the Project during construction and operations. As described therein, air quality impacts would be less than significant, and vibration impacts would be less than significant with implementation of mitigation. See also Response to Comment I-47-2 regarding construction traffic and detours.

### Comment I-227-3

Let's talk about asbestos. Asbestos was banned back in the late '90s because of the brake pads, a lot of the brake pads had asbestos. According to that law, asbestos in brake pads should have gone away. Any after-market brake pads, anybody can put on. Is Metro putting these types of brake pads on there? My son has asthma. He's only two years old. He's had asthma since he was small, since he was born. He has to be on nebulizer treatment every morning and afternoon. Could it be it? Who knows.

### Response to I-227-3

See Response to Comment I-193-6 regarding asbestos brake pads.

### Comment I-227-4

Underground is more efficient and more stations to be more efficient. Don't throw away $5 billion for nothing. Thank you

### Response to I-227-4

See Response to Comment A-10-5 regarding grade separation.

## I-228: S D

### Comment I-228-1

Hi. I'm just going to give my initials, SD. And I live in Whittier. I applaud the city of Pico Rivera residents for coming out and opposing this project. This is definitely something that I think is being perpetrated by politicians, such as Mr. Dutra who sits on the board and is also a council member. What I'd like to know is are you going to have Mr. Dutra recuse himself? And also, how much subsidies is the City of Whittier going to give Metro?

### Response to I-228-1

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment I-228-2

There's a public safety issue that I'm very concerned about. Our Whittier Police Department is already very understaffed. The unarmed people that you hired to go on the Metro lines are not going to stop a rape, a robbery, which you know are happening on the Metro line, as well as robberies and other things, thefts and things of those sorts.

### Response to I-228-2

See Responses to Comments I-7-3 and A-18-19 regarding security concerns, in terms of crime and policing.

### Comment I-228-3

Other than that, I'm very concerned of the impacts our businesses are going to have along Washington Boulevard. We're already very heavily impacted by the numbers that are causing the cities to rezone a lot of business areas to allow for high density housing, and this is causing a lot of businesses to shut down because they're being bought out. And I'm worried that your project is also going to harm our businesses and our residents.

### Response to I-228-3

Metro values local business and is committed to reducing potential negative effects of the Project. To minimize those impacts, relocation assistance and benefits would be provided to displaced businesses in accordance with state and federal regulations and in accordance with Metro policies. In addition, as discussed in Section 3.10.6, Land Use and Planning, of the Recirculated Draft EIR,

properties acquired may be available for joint development or parking facilities subject to standard planning and permitting review processes separate from this environmental review process. Property acquisition would be generally limited to properties currently zoned for commercial or industrial uses. The new uses would be consistent with existing commercial and industrial uses and the land use characteristics of the transportation corridor.

Regarding the commenter's stated concern that the Project would indirectly impact existing businesses in the area surrounding the Project, CEQA requires discussion of the ways in which the project could promote economic or population growth in the vicinity of the project (CEQA Guidelines Section 15126.2[e]) and assessment whether a project would remove obstacles to growth, require construction of new facilities or facilitate other activities that could cause significant environmental effects. See Response to Comment A-8-21 regarding concerns over impacts to local businesses. See Response to Comment B-2-9 regarding Growth Inducing Impacts.

### Comment I-228-4

We don't need the Metro in Whittier. I oppose it.

### Response to I-228-4

The commenter's opposition to Alternative 1 is noted.

## I-229: Sergio Arangula

### Comment I-229-1

Perfect. Okay. My name is Sergio Arangula, ZIP code is 90606. And unlike many who have been opposing this, I'm actually looking forward to this. I'm a young professional that lives close by on Washington and Broadway. And we're really looking forward to seeing this in the ballot. A lot of my friends have been looking for the day for us to support this.

### Response to I-229-1

The commenter's support for the Project is noted.

### Comment I-229-2

But I'm going to stick to the topic here and critique a little bit of the environmental aspect of this. I'm looking specifically on page 337 of the environmental document where it states about the transmission lines. My concern is how much will we have to mitigate those transmission lines as we get closer to Whittier? I know that when once you cross over, I believe, San Gabriel River, you have two 20KB and 500KB lines. And if we do have to mitigate those lines in regards to clearances to the OCS, how much would we be on the hook for? And would we have to underground lines as well? I guess -- and have we compared those to other route options such as the purple line or the blue line? How much more significant would that cost us if we were to keep it at-grade or aerial and then maybe move it down to underground? A couple of the comments. But for the most part, we're really looking forward to this. There will be a day where this will be on the ballot, and we can't wait to vote on that. Thank you.

### Response to I-229-2

See Response to Comment I-54-2 regarding Southern California Edison transmission lines.

## I-230: Eva Cuellar

### Comment I-230-1

Very, very, bad idea. Put your train someplace else. I oppose this project.

### Response to I-230-1

The commenter's opposition to the Project is noted.

## I-231: Cassie Cuellar

### Comment I-231-1

Pico Rivera is a residential city. We have a high school and a middle school this is going to be very dangerous. Kids don't even wait for green lights

### Response to I-231-1

See Response to Comment I-36-3 regarding pedestrian safety.

## I-232: Nicole Cuellar

### Comment I-232-1

Your project is a really bad idea Pico Rivera doesn't need any "train" the traffic is going to be dangerous and unbearable it will be difficult For Residents to get around.

### Response to I-232-1

The commenter's opposition to the Project is noted. See Response to Comment I-10-5 regarding project need. See Response to Comment I-21-1 regarding traffic.

## I-233: Esther Celiz

### Comment I-233-1

1) We are against this train coming through our city –your consideration for not coming down Washington Blvd. Please have consideration for our students from El Ranch High School crossing on Washington | Passons, students from Rivera middle school, a total of over 3,000 students will be crossing Washington Blvd and Passons on a daily basis very unsafe for our student and residents.

### Response to I-233-1

The commenter's opposition to Alternative 1 is noted. See Response to Comment I-55-2 regarding school children crossing at the intersection of Washington Boulevard and Passons Boulevard, and Response to Comment I-170-1 regarding the assertion that over 3,000 students will cross Washington Boulevard on Passons Boulevard.

### Comment I-233-2

2) We do not want another 3rd St. In ELA. Congestion on Washington Blvd will be tremendous with trucks and traffic, Washington Blvd. Bridge will need to be reinforced, from overuse of trucks. You will cause more traffic to also congest Slauson and Slauson bridge.

Homes on Washington, which you have not considered will be overwhelmed by construction and daily train noise.

### Response to I-233-2

The commenter's opposition to the Project is noted. See Response to Comment I-21-1 regarding traffic congestion and Response to Comment I-41-3 regarding operational noise.

### Comment I-233-3

Safety is our main concern, and your ridership is very low.

### Response to I-233-3

See Response to Comment I-36-3 regarding vehicle and pedestrian safety. See Response to Comment I-13-1 regarding ridership.

### Comment I-233-4

Do not ruin our city by making this train.

### Response to I-233-4

The commenter's opposition to the project is noted. See Response to Comment I-4-3 regarding environmental impacts of the Project.

## I-234: Edmund Veloz

### Comment I-234-1

This letter consists of my comments concerning the Eastside Transit Corridor Phase 2 - Draft Environmental Impact Report, June, 2022.

To begin with, due to the 1,012 page length of the report, the length of time for the public to examine the EIR should have been significantly more than 60 days. I believe this short period of· time to allow for the inspection of the document for accurancy, and cross-referencing of other information is a standard fixture of a corrupt project. Such a daunting amount of information as is contained in this EIR is impossible for even an experienced bureaucrat to be able to make a cursory examination of it in 60 days. I believe that was intentional. This document of 1,012 pages containing an overflow of dense, technical information basically crippled public scrutiny. I believe that a document packed with so much information as this EIR contained should allow the public at least 180 days to inspect it. After all, this project is supposed to be for the public, - and for the public's benefit, as in public transportation.

### Response to I-234-1

See Response to Comment CO-5-1 regarding the request for an extension of the public comment period for the Recirculated Draft EIR. The Recirculated Draft EIR presents complex information in

an accessible and easily digestible manner. It provides a comprehensive overview of the existing environmental setting, the build alternatives and no-build alternative, potential impacts, and proposed mitigation measures. It includes an Executive Summary, which effectively distills the impact discussions for each resource topic, and it includes graphics, tables, and figures to readily convey technical details and enhance the document's readability.

### Comment I-234-2

But, from what I could make out, this Environmental Impact Report is, in parts, biased, negligent, hypocritical, naive, contradictory, and possibly even fraudulent.

The bias of the people who produced the EIR of 2014, and the people who paid them to produce it, is right in plain sight. Going back to the EIR of August, 2014, it shows a light rail train right on the face page. That was the exact picture of what the final result of the EIR was going to be, and the public was supposed to immediately accept it. It was the light rail train that the EIR was always supposed to ultimately recommend. Virtually the same cover is on the new EIR dated June, 2022, and no doubt the same expectation is held by the producers of the EIR, and the people who paid them.

### Response to I-234-2

The commenter makes allegations about the veracity and accuracy Recirculated Draft EIR, but does not provide any specific information in support of that assertion.

Pursuant to CEQA, the Recirculated Draft EIR is a public disclosure document that objectively evaluates the environmental impacts of the Build Alternatives proposed by the Lead Agency and the No Project Alternative. It evaluates the impacts of all alternatives and identifies the environmentally superior alternative (Section 15126.6 CEQA Guidelines), but it does not make a recommendation to decision-makers (Metro Board of Directors) who will make the decision to certify the Final EIR. The cover graphic represents the proposed Build Alternatives analyzed in the Recirculated Draft EIR.

### Comment I-234-3

On one of the very first pages of the EIR of August, 2014 the original four alternatives were shown: 1. The No Build Alternative, 2. The TSM Alternative, 3. State Route 60 (SR 60) LRT Alternative, and 4. The Washington Boulevard LRT Alternative. Any project that would become reality would emanate from one of. these four alternatives. The entire EIR consists of data dealing with the four alternatives.

The data detailed in the EIR emanating from the four alternatives is supposed to result in the most ideal public transportation project. That most ideal public transportation project was/is stated as "a locally preferred alternative." In each of the six community scoping meetings which the Metro conducted in June of 2019 each one of your (Jenny Cristales Cevallos) introductory speeches stated that the goal of the Metro 2019 EIR scoping meetings was to identify "a locally preferred alternative." This was often accompanied by a statement similar to, "...we're soliciting input to ensure that this purpose and need meets the community's needs and concerns." The above excerpts were a policy speech written for you by a Metro administrator, and the excerpts defined official Metro policy, not that of Jenny Cristales-Cevallos. This Metro policy was carried forward, and showed-up in the EIR of June, 2022. It is stated in the last sentence of the second paragraph on page ES-5. It states, "The NOI/NOP also described consideration of adopting a Locally Preferred Alternative (LPA) by the Metro Board based on the findings of the

Supplemental/Recirculated Draft EIS/EIR." However, it is evident that the official Metro policy was to somehow force that the Washington Boulevard Gold Line light rail train system was the "locally preferred alternative," and "...meets the community's needs and concerns." - no matter what. That was to be done while making it look like the public actually had a voice in the matter. The other three alternatives were to · be eliminated from the very beginning. This was evidenced by the appearance of the term "Environmentally Superior Alternative" shown on page ES-37, and more thoroughly detailed on page 5-28.

### Response to I-234-3

The Recirculated Draft EIR supersedes the 2014 Draft EIR/EIS and therefore, no response to comments on the 2014 document is required. However, it should be noted that Metro selects a locally preferred alternative (LPA) based on a number of considerations, including an alternative's conformance with project objectives, environmental impacts identified in the environmental review, local community input, and cost and funding considerations.

For background information on the transit options that have been considered and evaluated for the region and that have led to the evolution and selection of the Project evaluated in the Recirculated Draft EIR, see the Eastside Transit Corridor Phase 2 Alternatives Analysis (AA) Report that was published in 2009. The AA Report established the purpose and need of the project and identified and assessed transportation alternatives to be studied further in the environmental process. See also Appendix T, Alternatives Withdrawn from Further Evaluation, of the Recirculated Draft EIR and See also Response to Comment I-116-2.

Regarding the alternatives evaluated in the Recirculated Draft EIR, refinements of two of the four alternatives addressed 2014 Draft EIR/EIS, are evaluated: the No Project Alternative and Washington Alternative. Regarding the other two alternatives, as described in Chapter 5, Comparison of Alternatives, and Appendix T in the Recirculated Draft EIR, the SR-60 Alternative was withdrawn due to environmental constraints and other considerations. See Response to Comment I-62-1 regarding why a TSM Alternative was not evaluated.

The identification of an "environmentally superior alternative" among the alternatives analyzed in an EIR is required pursuant to CEQA Guidelines Section 15126.6. As stated in Section 5.7 of Chapter 5, "Under Section 15126.6(a) of the CEQA Guidelines, an "environmentally superior alternative" must be identified in order to determine which alternative possesses an overall environmental advantage when compared to all other alternatives evaluated in this Recirculated Draft EIR." The determination of the environmentally superior alternative is based on the number and severity of significant impacts that an alternative would have. As further explained in Section 5.7, the identification is provided to inform the decision-makers, but they are not required to select this alternative.

### Comment I-234-4

In 2019, after studying the 2014 EIR, I realized that the Transportation System Management Alternative(TSM) was a much more efficient, and cheaper alternative than any of the other three. Also the TSM Alternative would have a much less negative effect on all neighborhoods through which Washington Boulevard ran.

### Response to I-234-4

See Response to Comment I-62-1 regarding the TSM Alternative.

### Comment I-234-5

I was able to put together some volunteers who believed the same as I, and we circulated petitions against the Washington Boulevard Gold Line. At the same time, those same petitions endorsed the TSM Alternative. For the purposes of fulfilling the input of comments concerning this newest EIR, I am submitting 16 mostly completed petitions, and one petition which contains the signers and the names of the businesses they represent, only. Enclosed are 16 mostly completed petitions which contain 1583 signatures. There is another petition for businesses only which contains 48 signatures. The total of all the petitions is 1631 signatures. All the signers of the petitions are against the Washington Boulevard Gold Line light rail, and all the signers endorsed the TSM Alternative. We have 1631 people who are unmistakeably stating that the TSM Alternative is our "locally preferred alternative," hands down. The Gold Line light rail must be eliminated. It has been thoroughly rejected. The Washington Boulevard Gold Line light rail has virtually no popular support. There is no case for it to be built. The TSM Alternative is also the "Environmentally Superior Alternative."

### Response to I-234-5

The petition is acknowledged and all petition signature pages provided with the Comment Submission are presented in **Appendix A** of the Final EIR. It should be noted that the petition contained one duplicate compilation of 100 signatures. **Appendix A** includes all pages submitted with the comment, including the duplicated signatures.

See Response to Comment I-62-1 regarding the TSM Alternative.

The Recirculated Draft EIR identifies Alternative 3 as the environmentally superior alternative. See Response to Comment A-8-6 regarding the selection of the environmentally superior alternative.

### Comment I-234-6

In looking through the EIR, I did not see where the subject of demolition was addressed. That is, if the light rail is to be constructed, along the entire atgrade route, much of Washington Boulevard will have to be demolished.

### Response to I-234-6

See Section 3.3.4.3 in Appendix P Construction Impacts Report of the Recirculated Draft EIR for a description of construction of the Project, including roadway demolition. Construction impacts, including those associated with demolition, are addressed for each resource topic in Chapter 3 of the Recirculated Draft EIR.

### Comment I-234-7

That means that much of the concrete and asphalt will have to be broken through with things like pile-drivers, jack hammers and other machines used for breaking-up large areas of concrete and asphalt. The problem is that over the several decades that the pavement has been in place it has absorbed huge amounts of various lubricants, automotive chemicals, and any other chemical or substance that falls on it. When the pavement is broken-up it releases clouds of dust into the air. This dust is contaminated with all the aforementioned substances, and it can be carried by the wind, and can affect large areas of the neighborhoods near Washington Boulevard.

### Response to I-234-7

The commenter states that the Project would result in contaminated dust from demolition activities being carried by winds to neighborhoods near Washington Boulevard. However, this is not the case because, as stated on page 3.2-5 of the Recirculated Draft EIR, SCAQMD Rule 403 for Dust Control would require construction contractors to implement best available dust control measures during construction activities capable of generating fugitive dust. Further, MM HAZ-3, detailed on Page 3.8-70 of the Recirculated Draft EIR, defines the procedure for the identification of unanticipated contamination during all ground-disturbing activities throughout Project construction. As indicated in the measure, should contamination be encountered, work shall be halted and materials tested, and the requisite project, local, and regional framework for addressing contamination would be applied.

### Comment I-234-8

Watering these sections down prior to demolishment can result in further contamination because the water sprayed on the demolition site will become contaminated and fall into the soil underneath where the broken pavement used to be.

### Response to I-234-8

Potential water quality impacts from construction of the Build Alternatives are addressed in Section 3.9.6.1 of the Recirculated Draft EIR. In this section, Metro acknowledges that contaminated runoff from construction sites would have the potential to degrade surface water quality. To reduce any potential impacts related to stormwater runoff, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared to comply with the California State Water Resource Control Board's NPDES Construction General Permit (see details of SWPPP requirements in Section 3.9.7.1 of the Recirculated Draft EIR and revised in the Final EIR). As outlined in Section 3.9.6.1, implementation of the SWPPP would ensure that pollutant discharges from the construction site would be properly controlled. The Los Angeles Regional Water Quality Control Board's NPDES MS4 permit also specifies that permittees must implement a program to control runoff from construction activities. The implementation of the SWPPP and compliance with NPDES permits would reduce impacts to less than significant.

### Comment I-234-9

Almost none of this would happen with the TSM Alternative. The only places that might have to be excavated would be to improve the bus stops, and that would be on the sidewalk, not in the roadway, and it would consist of a very minimum of jack-hammering to possibly place new support columns for the bus stop roofs. By itself, the TSM Alternative would be robust operation which can easily function on its own. It will operate with electric buses which emit no exhaust, and cause no noise pollution because they are silent. As it is, while not perfect, at present, the public is using the buses, even though they are presently diesel powered, and we are getting along with the buses just fine.

### Response to I-234-9

See Response to Comment I-62-1 regarding the TSM Alternative.

### Comment I-234-10

There is no listing for NEPA, or the National Environmental Policy Act in the section for references in the EIR.

### Response to I-234-10

This is correct. NEPA was not used or cited a reference document in the Recirculated Draft EIR and therefore is not cited in Chapter 9, References, of the Recirculated Draft EIR.

### Comment I-234-11

There is no remedy for the rights-of-way for emergency vehicles. It has been my experience on several occasions that emergency vehicles travelling down one side-of the street had to switch to the other side of the street when they encountered impassable congestion. That will not be possible if there is a light rail right-of-way in the middle of the street.

### Response to I-234-11

See Section 3.13.6.1, Public Services and Recreation, of the Recirculated Draft EIR. As discussed therein, trains would be operating in exclusive street-running ROW and would be able to clear signaled and unsignalized intersections quickly to allow emergency vehicles to pass. Delays resulting from LRT operation would be brief due to the short length of the LRT trainsets and the short time required for LRT vehicles to enter and exit the crossings. Therefore, the intersection would continue to facilitate the passage of emergency vehicles. As identified in project measure PM PSR-1, the contractor shall coordinate with fire and police protection officials when designing grade crossings to ensure that access for police and fire protection services is maintained under the Project. Metro shall be included in all correspondence with third parties.

### Comment I-234-12

Lastly, there is no contingency for earthquakes.

### Response to I-234-12

Section 3.6, Geology Soil and Paleontological Resources, provides a discussion of potential earthquake impacts in association with the Project. As described therein, the Project would be constructed in compliance with engineering codes, standards, and requirements for seismic safety. Operation of the Project would not cause potential substantial adverse effects, including the risk of loss, injury, or death from known earthquake fault rupture, strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides. Therefore, the impact would be less than significant.

### Comment I-234-13

PETITION FOR MONTEBELLO AND PICO RIVERA RESIDENTS AND LOS ANGELES COUNTY RESIDENTS AND TAXPAYERS AGAINST THS LOS ANGELES COUNTIY METROPOLITAN TRANSPORTATION AUTHORITY GOLD LINE TRANSIT CORRIDOR PHASE 2 EXTENSION_WASHINGTON BOULEVARD ALTERNATIVE.

I, the undersigned, declare that I am a taxpaying resident of Los Angeles County, and I am firmly opposed to the proposed Los Angeles County Metropolitan Transportation Authority (Metro) Light Rail Project known as the Gold Line Eastside Transit Corridor Phase 2 Extension, _Washington Boulevard Alternative. I oppose this project for any, or all, of the following reasons:

### Response to I-234-13

The petition is acknowledged and all petition signature pages provided in Comment Submission I-234 are included in **Appendix A** of the Final EIR. See Responses to Comment I-234-14 through I-234-19 below.

### Comment I-234-14

1. If the light rail is constructed, there will be two tracks down the middle of Washington Boulevard, and they will be fenced-in. It will be the same as a barrier wall down the middle of Washington Boulevard which cannot be crossed-through by vehicles, or pedestrians, and it will eliminate left turns either onto, or off of Washington Blvd., except at widely spaced-apart intersections. School children and parents will be in danger on school days in South Montebello. According to the Metro's own Environmental Impact Report (EIR) this will cause more traffic, congestion, and bring heightened danger to the neighborhoods north and south of Washington Boulevard.

### Response to I-234-14

The commenter mischaracterizes the determinations made in the Recirculated Draft EIR. As explained in Section 3.14.6.2 of the Recirculated Draft EIR, Alternative 1 would result in reduced VMT (approximately 10,000 daily) compared to the No Project Alternative, and is not expected to lead to a substantial or measurable increase in vehicle travel. Additionally, Section 3.13.6.1 explains the demand for fire and police protection demand during the construction and operation period is anticipated to remain at acceptable levels and would not require new or physically altered fire or police protection facilities. Impacts on public services would be less than significant. Additionally, see Response to Comment A-2-8 and A-2-10 regarding safety measures and nearby schools.

### Comment I-234-15

These problems will also lower the neighborhood's property values.

### Response to I-234-15

See Response to Comment B-2-9 regarding consideration of economic or social change under CEQA. The financial concerns expressed in the comment do not pertain to the environmental analysis in the Recirculated Draft EIR and no further response is required.

### Comment I-234-16

2. According to the Metro EIR, in order to make room for the light rail, which will be constructed down the middle of Washington Boulevard from Telegraph Road to Lambert Road in Whittier, one traffic lane in each direction will be eliminated. Traffic on Washington Boulevard will become impossibly congested, especially at rush hours.

### Response to I-234-16

As stated in 3.14.6.1.1 of the Recirculated Draft EIR, Alternative 1 would result in a reduction in general-purpose travel lanes from three lanes to two lanes, and the elimination of ingress/egress movements at driveways and selected cross streets along Washington Boulevard. In addition, parallel east–west routes (e.g., Telegraph Road, Olympic Boulevard, Whittier Boulevard) would continue to serve as alternatives to Washington Boulevard, providing additional connections to and from the regional freeway network. As such, changes in general-purpose travel lanes would be

consistent with local and regional circulation elements and plans. Therefore, operation of Alternative 1 would result in less than significant impacts related to traffic circulation.

### Comment I-234-17

3. I have become aware of the Transportation System Management (TSM) Alternative, which was detailed in Metro's own Environmental Impact Report (EIR), and I believe that the TSM Alternative will be a much better method of public transportation than then Metro Light Rail system. By using electric buses instead of rail cars the TSM Alternative will cost a fraction of the rail system. It can be up and running in 6 months to one year, and there will be no need for any major construction along the Washington Boulevard route. Using the TSM Alternative instead of constructing the Metro Light Rail will also save taxpayers approximately $1.65 billion.

### Response to I-234-17

See Response to Comment I-62-1 regarding the TSM Alternative.

### Comment I-234-18

4. The Gold Line light rail will cost taxpayers at least $1.7 billion to build. It may be possible to start using she TSM Alternative at a cost of $17 million, which is one one-hundreth of the $1.7 billion cost of the Gold Line. Even if he TSM cost is doubled to $34 million, that is still one- fiftieth of the cost of the Gold Line. Therefore, I believe building the Metro Gold Line Light Rail system will be a huge waste, and misspending of taxpayers' money if it is constructed.

### Response to I-234-18

See Response to Comment I-9-2 regarding the project cost. See Response to Comment I-62-1 regarding the TSM Alternative.

### Comment I-234-19

5. Because the Gold Line Light Rail informational, or scoping meetings about the light rail were conducted in a secretive and false manner, in is clear that the Metro people did not want the residents of South Montebello, and South Pico Rivera to know how bad the light rail system would be if it is built in chose neighborhoods. They did not tell the residents about the meetings, and they did now hold any meetings in South Montebello or South Pico Rivera.

### Response to I-234-19

The public comments received and responses to those comments are part of the Final EIR and will be taken into consideration by the decision-makers when considering certification of the Final EIR and whether to approve the Project. See Response to Comment I-161-3 regarding public outreach conducted for the Recirculated Draft EIR.

## I-235: Irene Carillo

### Comment I-235-1

I am against it; I live off of Washington Bl and Broadway and traffic is bad on Broadway. And i feel it's going to get worst. My house was hit twelve yrs. ago because of speed. they drive on Broadway like it is the 605 freeway. I have lived here for thirty-eight years. And traffic has triple. And going to get worse. So I am against this. Traffic is bad.

### Response to I-235-1

The commenter's opposition to the Project is noted. See Response to Comment I-21-1 regarding traffic congestion.

## I-236: Anonymous

### Comment I-236-1

I do not care for the Metro track Run on street level for the Pico Rivera area. Why not use the train track that area already has the over passed. Rethink would work best.

### Response to I-236-1

The commenter's opposition to an at-grade alignment is noted. See Response to Comment I-160-1 regarding the train bridge at Durfee Avenue. See Response to Comment A-10-5 regarding grade separation.

### Comment I-236-2

Pico Rivera just build the new train tracks to over passed to help clear traffic and waiting time that traffic was waiting to get across town. This will be a hardship for our town and community. Metro track need to be elevated not run street level.

### Response to I-236-2

The commenter's support for an elevated train is noted. Delays resulting from LRT at-grade operations would be brief due to the short length of the LRT trainsets and the short time required for LRT vehicles to enter and exit the crossings. Given that trains would be operating in exclusive street-running ROW at these locations, it would be possible for trains to clear signaled and unsignalized intersections quickly.

### Comment I-236-3

That traffic needs not to stop and wait for train to pass. Rethink!!! -Please stop-

### Response to I-236-3

See Response to Comment I-236-2 above.

### Comment I-236-4

Maybe elevate the tracks up with overhead post. Not street level. Rosemead/Washington Do not build these train tracks. No Metro!!!

### Response to I-236-4

The commenter's opposition to the at-grade configuration is noted. See Response to Comment A-10-5 regarding grade separation.

### Comment I-236-5

Environmental impact- Hurt. Emergency response, police response, students danger walking to and from school crossing, traffic, danger pedestrians crossing, no parking outsiders, safety on

trains, depots safety, more homeless... this will dirty our town. What these plans will do is bring trash to enter our town.

### Response to I-236-5

See Section 3.13, Public Services and Recreation, of the Recirculated Draft EIR for an analysis related to safety and security, fire and police protection services, and vehicular and pedestrian crossings. See also Response to Comment I-36-1 regarding emergency response. See Response to Comment A-8-19 regarding people experiencing homelessness. See Response to Comment I-2-1 regarding parking. See Response to Comment I-36-3 and Response to Comment I-223-2 regarding pedestrian and vehicle safety.

## I-237: Yolanda

### Comment I-237-1

Hi. My name is Yolanda. I got a notice regarding the project you guys want to do off of Washington. I really don't agree to this project for several reasons.

One is we already have a lot of homeless, and it will multiply by you guys having this Metro going through Washington.

### Response to I-237-1

The commenter's opposition to the Project is noted. See Response to Comment A-8-19 regarding security and people experiencing homelessness.

### Comment I-237-2

Another thing, it's really busy. It's a busy street as it is, and it's also very, very close to homes. It's -- there's a lot of homes that are really, really close, a lot of residents close to Washington. As it is, public transportation is definitely not safe, so I totally disagree with this project. You can reach me at (562) 762-8148, and I will also be attending the meeting on July 30th. Thank you.

### Response to I-237-2

The commenter's opposition to the Project is noted. As identified in Section 3.10.6.1.1, Land Use and Planning, of the Recirculated Draft EIR, the Project along Washington Boulevard would be consistent with the land use characteristics of the transportation corridor. The addition of a new LRT system along Washington Boulevard would not affect vehicular, bicycle, or pedestrian access or result in property acquisitions of residential uses, and would not physically divide an established community.

## I-238: Anonymous

### Comment I-238-1

Yes. I have a question regarding your Site Transit Corridor Phase 2. When the project is finished, will the Washington Boulevard in Whittier be down to one lane going both directions? That's my question; all right? Thank you. Bye. And give us a call back at your number. Please give me a call back at this number. Thank you.

### Response to I-238-1

As stated in 3.14.6.1.1 of the Recirculated Draft EIR, Alternative 1 would result in a reduction in general-purpose travel lanes from three lanes to two lanes. Parallel east–west routes (e.g., Telegraph Road, Olympic Boulevard, Whittier Boulevard) would continue to serve as alternatives to Washington Boulevard, providing additional connections to and from the regional freeway network. As such, changes in general-purpose travel lanes would be consistent with local and regional circulation elements and plans.

## I-239: Maria Gonzalez

### Comment I-239-1

Good morning. My name is Maria Gonzalez, and I live in Pico Rivera, 9612 Washington Boulevard. The reason that I am calling is because I don't agree with -- with -- that they are going to add a train in Pico Rivera. Pico Rivera is a city that is very pretty and -- and clean; and with this train, there is going to be a lot of people, a lot of homeless.

### Response to I-239-1

The commenter's opposition for the Project to extend to Pico Rivera is noted. See Response to Comment A-8-19 regarding security and people experiencing homelessness. The Project is not anticipated to directly foster growth since no housing would be constructed as part of the Project.

### Comment I-239-2

There is going to be a lot of traffic. There is going to be a lot of people that, like, just grab things. And I -- please, I ask -- I ask my vote for you not to add this train. Thank you. If you have any comments, you can call my telephone, (562) 413-1020. Thank you, and have a good day. Good-bye.

### Response to I-239-2

The commenter's opposition to the Project is noted. See Response to Comment I-21-1 regarding traffic. See Responses to Comments I-7-3 and A-18-19 regarding crime and safety.

## I-240: Martha Fausto

### Comment I-240-1

Hello. My name is Martha Fausto. I received a card here for the Metro. I do not like to have the Metro here. It's bad enough that we have the -- Whittier gross as it is. A lot of traffic already on Sorensen. We don't need any more traffic like Third Street, only one-way streets. It would be too much. And besides that, they can't go any further on Lambert, so what's the use?

### Response to I-240-1

The commenter's opposition to the Project is noted. See Response to Comment I-21-1 regarding traffic. See Response to Comment I-10-5 regarding project need.

### Comment I-240-2

So I would suggest that somebody get on this and try and demote the transition, trying to get the Metro all the way over here. And I hope to God that it does not happen. I am praying so much

because I lives close to Washington Boulevard. I think it's going to be a disaster. You guys don't seem to realize that, that people live around here. And we're going to have a lot of people coming in, and for what? For nothing.

### Response to I-240-2

The commenter's opposition to the Project is noted. See Response to Comment I-10-5 regarding the project need.

### Comment I-240-3

Just to do trouble, burglaries, trolling. As it is, we already have enough. So please think about this. I'm going to get ahold of the Whittier -- and City as well and let them know how I feel. I hope you have a lot more messages than mine. Thank you. And with regards -- I pray to not to bring that in. Thank you.

### Response to I-240-3

See Response to Comment I-7-3 regarding crime.

## I-241: Cheryl Parker

### Comment I-241-1

I'd like to let you know that I, Cheryl Parker -- I live in Whittier -- is completely against the Metro light rail. I think there are other ways that are a lot cheaper for the taxpayers and more convenient for the people that live in the are- ---Washington Boulevard area.

### Response to I-241-1

The commenter's opposition to the Project is noted. See Response to Comment I-9-2 regarding the project cost.

### Comment I-241-2

And I think this is a waste of taxpayers' money, by going down the middle of Washington – of Washington Boulevard on the light rail and therefore taking out at least two lanes, one going each way, for cars, because if you go in rush hour in the morning and rush hour in the afternoon, you'll see the cars are completely backed up. And I know the light rail -- you're thinking that it's going to take a lot of people out of their cars and onto the light rail; but still, there's going to be an overwhelming of cars, and they're going to be stuck. And I think there's an absolute less expensive way of doing this, and I think you guys really need to listen to the residents that live around here.

### Response to I-241-2

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership. See Response to Comment I-21-1 regarding traffic impacts. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

### Comment I-241-3

Whittier itself is not going to be affected that badly because the rail's on Washington and Uptown Whittier is another couple miles away. So I think you really need to listen to the people in

Montebello and in Pico Rivera. And I am in the unincorporated part of Whittier, so I will also be very affected by this. And I just think it's a bad idea all the way around. Thank you.

### Response to I-241-3

The commenter's opposition to the Project is noted.

## I-242: Mohammed Abass

### Comment I-242-1

Hello. My name is Mohammed Abass. I live on Sunset and Whittier at 90602. I'm very excited about this project and bringing the train as soon as possible. Back in 1923, when my house was built, there was the red car that came back to Whittier. So, I'm very excited to bring the trains back to Whittier, the public transit back to Whittier. My only question or comment is asking whether there's a potential to study an alternative that brings the train from the PIH where the current stop is proposed to uptown and closer to all the businesses.

### Response to I-242-1

The commenter's support for Alternative 1 is noted. A direct route to Uptown Whittier was considered in the 2009 Alternative Analysis but withdrawn due to concern for potential impacts to businesses during construction, right-of-way requirements and increased congestion. See Response to Comment I-1-4 and Recirculated Draft EIR Appendix T, Alternatives Withdrawn from Further Evaluation, for additional information.

### Comment I-242-2

There's a lot of jobs out there. I was just walking around uptown today. We have such a beautiful uptown, such a beautiful place with stores and whatnot, and places where people work. It would be great if we could connect that to the Metro as well. So, thank you to the Metro staff and to the council members who all put this together and to the supervisors who helped support this, and I hope this comes to Whittier as soon as possible. You know, I work in downtown. My wife works at UCLA. It would make our commute and our lives a lot better and easier. Thank you very much.

### Response to I-242-2

The commenter's support for Alternative 1 is noted.

## I-243: Maggie Mo

### Comment I-243-1

Hi. Good afternoon. Thank you, everybody, for coming. This is so important. My name is Maggie Mo. I have mixed feelings about this Gold Line. I'm very concerned that it's going to come -- this Gold Lineic going to come down to Lambert. And so, my question is -- I see all these beautiful plans, but I don't see any plans for a parking lot. Where are the people going to park? Do you really think that people are going to leave their cars and they're going to come down to Lambert and then get on the Gold Line? I don't see any plans for any parking at all, and we don't have any parking in District 1. This is going to create a big change in our -- in the City of Whittier.

### Response to I-243-1

As described in Section 2.5.1.2 of Chapter 2, Project Description, of the Recirculated Draft EIR, the existing parking structure located north of the 3rd Street and Atlantic Boulevard intersection would continue to serve the Atlantic/Pomona station (relocated/reconfigured), and surface parking would be provided at each of the at-grade stations. It should also be clarified that the alignment does not extend down Lambert Road and it instead curves southward approximately one block west of Lambert Road.

### Comment I-243-2

We already are gridlocked with traffic. Where is all the traffic going to be going to?· There will be traffic gridlocked on Washington, then Whittier Boulevard, and then a lot of people in the City of Whittier, like off Beverly Boulevard -- they -- people are already gridlocked, and they're going through their communities to avoid traffic. So I'm very concerned about the traffic. I'm concerned about our environment.

### Response to I-243-2

As stated in Section 3.14.6.1.1 of the Recirculated Draft EIR, Alternative 1 would result in a reduction in general-purpose travel lanes from three lanes to two lanes, and the elimination of ingress/egress movements at driveways and selected cross streets along Washington Boulevard, which could require some changes to truck ingress/egress for industrial properties in Commerce and Montebello. Approach and departure routes for trucks, for example, might need to change slightly to accommodate new turn restrictions at selected locations. However, Alternative 1 would not preclude vehicle or truck access along Washington Boulevard, and left-turn movements would continue to be allowed to and from major cross-streets (e.g., Garfield Avenue, Greenwood Avenue) at signalized intersections as identified in PM TRA-1 (Section 3.14.7.1). In addition, parallel east–west routes (e.g., Telegraph Road, Olympic Boulevard, Whittier Boulevard) would continue to serve as alternatives to Washington Boulevard, providing additional connections to and from the regional freeway network. As such, changes in general-purpose travel lanes would be consistent with local and regional circulation elements and plans. Therefore, operation of Alternative 1 would result in less than significant impacts related to traffic circulation.

### Comment I-243-3

I'm concerned about the noise. And I'm concerned about all of the crime and homelessness that will be coming to Whittier.

### Response to I-243-3

See Section 3.11, Noise and Vibration, of the Recirculated DEIR for a detailed discussion of impacts related to noise from operation and construction of the Project. As identified in Section 3.11, operation and construction of the Project would result in less than significant impacts from noise, with implementation of mitigation.

See Responses to Comments A-8-19 and I-7-3 regarding people experiencing homelessness and crime and security.

### Comment I-243-4

Sheriff Villanueva already said that there is a lot of crime, and I don't see any kind of security or police on any of these trains.

### Response to I-243-4

See Responses to Comments I-7-3 and A-18-19 regarding crime and security.

## I-244: Edgar Edmond Veloz

### Comment I-244-1

Okay. My name is Edgar Edmond Veloz. I live in Montebello. At the last Whittier meeting of August 17th, of June 13th, 2019, 30 people testified. 20 were for the Gold Line; 18·were residents. Ten were against the Gold Line; seven were residents. Tonight we have 147 signatures against the Gold Line and 147 signatures in favor of the MTA's own transportation system management, an alternative using electric buses, which will be much more efficient than the Gold Line light rail at 1/100th of the cost. These signatures came from residents living in the Whittier neighborhood on Washington Boulevard near Sorenson and the hospital. Tonight we represent those people because in 2019, Whittier officials would not. Overall, we have over 1800 signatures against the Gold Line and the same amount in favor of the TSM alternative. Metro has nothing like this in their support.

### Response to I-244-1

See Response to Comment I-62-1 regarding the TSM Alternative.

### Comment I-244-2

The TSM alternative is absolutely the locally preferred alternative and the environmentally superior alternative, which is what the MTA claims they are trying to achieve. I believe that we are proving that if the MTA Gold Line is built, it will be as a result of blatant corruption.

### Response to I-244-2

See Response to Comment I-62-1 regarding the TSM Alternative.

## I-245: Jorge Martinez

### Comment I-245-1

I'm Jorge Martinez, Montebello, 90640. This distance -- MTA has lost its way because it has lost sight of who is its customer. Is it the MTA board of directors? No. Is it the L.A. county board of supervisors? No. Is it the Washington Boulevard coalition? No. So who is their customer? We, the people. If we, the people, want electric buses, give us electric buses, not trains.

### Response to I-245-1

See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered. See response to Comment I-62-1 regarding the range of alternatives to the Project that have been considered.

### Comment I-245-2

MTA's own ridership statistic show a distinct preference for buses, so why do they want to ram trains down our throats? If you want to build light rail systems with higher ridership, place them

down the middle or alongside the freeways like the Gold Line down the 210 Freeway, or the, what is it, the 91? Say no to the Gold Line.com. Thank you very much.

### Response to I-245-2

The commenter's opposition to the Project is noted. See Response to Comment I-10-5 regarding project need.

## I-246: Mike Martinez

### Comment I-246-1

Mike Martinez, resident from East L.A., zip code 9022 [verbatim].First of all, I do not need to be here. I'm here to protect your city. I live right in front of the existing Gold Line on Third Street. It's horrible. There's so much traffic, so much smudge on my house -- my home walls. It's not your typical dust. It's black smudge. And it's from possibly all the traffic, including the train that's running in front of my house.

### Response to I-246-1

Addressing traffic impacts associated with the existing Metro E Line (formerly Metro L [Gold] Line) is outside of the scope of the Recirculated Draft EIR except insofar as that information is relevant to the existing setting and cumulative impacts. For information on traffic congestion relative to the Project, see Response to Comment I-21-1. See also Section 3.2 in the Recirculated Draft EIR regarding air quality impacts associated with the Project, and Section 3.18 regarding cumulative impacts. As described therein, operation and construction of the Project would result in less than significant impacts on air quality and no mitigation is required.

### Comment I-246-2

Number 1, Chapter 6 of the environmental report, Section 6.9.2.3, it says "Public Outreach." They were supposed to put banners and electric ---electronic signs along the corridor that they were going to build it. I literally just drove over here from East L.A. for you guys, and I did not see one sign, not one billboard. I have never seen it. Check it out. Drive for yourself. If you don't believe me in East L.A., go take a drive. Go take a weekend ·out of your drive and test it out. See how you're going to like it.

### Response to I-246-2

See Response to Comment I-193-1 regarding electronic signs and banners.

### Comment I-246-3

There's a lot of delays, especially the center divider. It's going to block a lot of residential streets. That means emergency vehicles are going to take longer because they're going to have to take a U-turn.

### Response to I-246-3

See Response to Comment I-36-1 regarding emergency vehicles and Response to Comment I-189-2 regarding access.

### Comment I-246-4

The riders are 135. I had said 75. But the maximum occupancy is 135. There's literally six people riding per cabin. I've seen it because I see it from my window. I've seen it. Are they going to build it underground? More stations, 12 stations versus six. Push it.

### Response to I-246-4

See Response to Comment I-13-1 regarding ridership. See Response to Comment A-10-5 regarding grade separation.

## I-247: Diana Gomez

### Comment I-247-1

Hello. Good afternoon. My name is Diana Gomez, a current resident of Pico Rivera, concerned parent, also, of growing children. So one of my comments. I really wanted to go really briefly, really quickly. So traffic congestion, community delays, besides the environmental components, delay in first responders,

### Response to I-247-1

As explained in Section 3.13.6.1 of the Recirculated Draft EIR, implementation of the standard coordination and design practices are anticipated to maintain response times at acceptable levels. See also Response to Comment I-36-1.

### Comment I-247-2

pollution emissions from stalled traffic, unsafe train crossing for pedestrians and for our growing children, train crossings that impact not only on community, but also our children from going to school.

### Response to I-247-2

See Section 3.13 Public Services and Recreation of the Recirculated Draft EIR for an analyses related to vehicular and pedestrian crossings. See also Response to Comment I-36-3. Regarding air pollution, as identified in Section 3.2 Air Quality of the Recirculated Draft EIR operation and construction of the Project would result in less than significant impacts on air quality and no mitigation is required. See Response to Comment I-192-4 regarding vehicle delays.

### Comment I-247-3

And then also the increase of homelessness these train stations are going to bring. For example, in L.A., we see the issues with homelessness. And then also just to inform some residents in order -- there is two train – train underpasses in the city of Pico Rivera to avoid all these issues and they cost -- they cost the City $43 million for the underpass that was created in Passons. And on Durfee that was just opened, that cost taxpayers $107 million. And that was only --that underpass was built only to prevent all these congestion issues.

### Response to I-247-3

See Response to Comment A-8-19 regarding people experiencing homelessness. See Response to Comment I-9-2 regarding project cost. See Response to Comment I-21-1 regarding traffic congestion.

### Comment I-247-4

So now my problem is building another train that's going to be preventing the beauty of our city. Our city should be beautiful, and in order for us to do that, we need to stop this train from Metro building. Thank you.

### Response to I-247-4

The commenter's opposition to the Project is noted. Visual impacts to the existing communities are discussed in Section 3.1, Aesthetics, of the Recirculated Draft EIR. As discussed therein, the Project is not anticipated to cause a significant impact to visual resources or the visual character of the surrounding communities.

## I-248: Eugenia Reyes

### Comment I-248-1

Yes. My name is Eugenia Reyes. I am from Montebello, south side, off of Washington Boulevard. And I really do not want this Gold Line on my block because I'm literally off Washington Boulevard. I already deal with trucks. I don't need to deal with trains. I have homeless people walking up and down my block. It's going to bring more homeless people. I work at John Adams Middle School. There is a Metro that comes in from Long Beach and connects to Washington Boulevard. There are also homeless people around that block. So, I can just imagine that all these homeless people that are stuck in L.A. -- and now when the East L.A. bridge opens, now you have more homeless people crossing that bridge. Those homeless are going to start coming, going to start getting to Commerce and to Montebello and Whittier. I don't want the Gold Line. If you guys want to build this, then wait about 30 years and see if the mind and mentality changes, but not now. That's all I have to say.

### Response to I-248-1

The commenter's opposition to the Project is noted. See Response to Comment A-8-19 regarding people experiencing homelessness.

## I-249: Jessie Garcia

### Comment I-249-1

Hi. I'm Jesse Garcia. I live in south Montebello. In the real world, if I were to go in front of my boss and present this project and have him cut a check for $3 billion and tell them, "By the way, it's going to take 53 years for you to get your principal back," two things are going to happen:·He's going to laugh at me and then I'm going to get fired. Okay? It's going to cost 300 million per mile to build this train. It's 9.4. I've rounded it to ten, because it's going to be costing over. Metro is already aware that it's going to cost 6 billion -- 3 billion. 3 billion in 2029 won't ·buy you two-and-a-half billion, so I don't know where the money is coming from. And this is all based on my management skills, all data that is available off the website. As far as what the councilman says, it's going to take you 16 minutes from Whittier to downtown? It's not going to happen. It takes 16 minutes from Atlantic to Union Station, and that's·9.1 miles. This is 9.7? You're looking at a half-hour. So it's a pipe dream. I'm glad you guys brought it out here because I took Washington from my house all the way to here.

### Response to I-249-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. Regarding travel time, as discussed in Section 3.14.6.1.1 of the Recirculated Draft EIR, travel time between the Atlantic station (relocated/reconfigured) and the Lambert station for Alternative 1 would be approximately 22.6 minutes, which would be approximately 9 minutes faster than the projected auto travel time (32 minutes) between these two points.

### Comment I-249-2

You're going to ruin the neighborhood. Del Rey? Good luck. If you like going there – I do it once a year. That's all I can afford. That place is gone. All the beautiful houses and everything down that block, forget it. It's not going to happen. I mean, the best thing, it's an election year. All council people know they're going to get fired if they go for it.

### Response to I-249-2

Opposition to the Project is noted. The commenter is referred to Section 3.12, Population and Housing, and Section 3.13, Public Services and Recreation, of the Recirculated DEIR for a detailed discussion of impacts related to these resources from operation and construction of the Project. A brief summary of impacts related to these resource topics is provided below:

- Population and Housing: As identified in Section 3.12, operation and construction of the Project would result in less than significant impacts on population and housing and no mitigation is required.
- Public Services and Recreation: As identified in Section 3.13, operation and construction of the Project would result in less than significant impacts on public services and recreational resources and no mitigation is required.

## I-250: Maria Reyes

### Comment I-250-1

My name is Maria Reyes, and I live here in Montebello. Yes, Maple Avenue. So Metrolink is south of where I live right now. So this is going ·to be another block south of Washington there, and we really don't need that service. There's quite a bit of traffic.

### Response to I-250-1

See Response to Comment I-10-5 regarding project need. See Response to Comment I-21-1 regarding traffic.

### Comment I-250-2

There are cars and a lot of trucks going through there, so -- there's an elementary school there on Greenwood Street. And so at the other side of Washington, there's also the library there, so we really don't need that. We don't need that service. So there's a lot of homeless there on Washington Street, so I wonder:·What are you going to do with all the things that I've said about that?

### Response to I-250-2

See Response to Comment I-223-3 regarding vehicle and pedestrian safety. See Response to Comment A-8-19 regarding policing, security, and people experiencing homelessness.

### Comment I-250-3

We need more buses. We don't live in Whittier; okay?

### Response to I-250-3

The commenter's opposition to the project noted. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered. See Response to Comment I-62-1 regarding the TSM Alternative.

## I-251: Jesus Reyes

### Comment I-251-1

Okay. My name is Jesus Reyes. What happens out in East L.A. -- I don't know why you would want to do that. They can get parking out of us if there are other companies. My name is Jesus Manuel Reyes. And the second point is that there are so many other truck companies, at least five of them that -- we can call upon them. They're not small pickup trucks or anything. They're big semi-trucks. So if you're going to do this project, you're going to take those tracks -- remove those tracks in order for the traffic to go through them. It's very difficult for us who live there. What do you want us to do?·Just to hop on a plane or a helicopter? So for the persons out of East L.A. -- just let me very briefly -- that traffic of the train is only from 7:00 to 8:00, and after that, there's nothing.

### Response to I-251-1

See Response to Comment I-21-1 regarding traffic. See Response to Comment I-162-2 regarding parking. See Response to Comment I-189-2 regarding truck access.

## I-252: Reuben Valdez

### Comment I-252-1

Hello. My name is Reuben Valdez. I live in Whittier, California, 90606. I just want to come out and say I'm in favor of this project. I've been in favor of it since 2017, when it first started. And it's forward thinking is what I think because eventually we're going to probably be getting out of our cars. We see how much it is right now for gas, $6 a gallon; right? That's a reality. And the more and more as we age as a population, we're not going to be able to drive those cars. So we'll have an alternative to get to East L.A., to Whittier, all the way to downtown L.A., to the airport, to a variety of places. A lot of people don't want this to come down their street, down their neighborhood. This has been an argument all along, and, you know, it's something to think about. Yes, there will be impacts, but there's a bigger trade-off for the worldwide community in the end, and we all like the Pacific -- well, for those of us around -- we all like the Red Line and the electric cars, the Greenway trail. It's that kind of thing that we're looking at, something going for the future of the next evolution of our lives, and that's why I'm in favor of the project. And also, you know, it's going to be long term, and I think it's a big thing to think about. Thank you.

### Response to I-252-1

The commenter's support for the Project is noted.

## I-253: Howard Reuben

### Comment I-253-1

Hi. This is Howard Reuben, (626) 482-1263. I do not have a computer. I'm 91 years old, and you really messed me up. You go ahead and you spend billions of dollars for this Gold Line extension, a fraction of which could restore some of the bus service that you last year eliminated. In Sierra Madre there were two lines. Now there's nothing. All you can do is dial a number and hope you can get some service. No more -- no more service that you can expect. Since 1907 there was service in Sierra Madre. You took it off, and you want to spend billions of dollars on some mad, crazy idea, and you can't even put a decent bus service in and eliminate it.

### Response to I-253-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding the project need. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

### Comment I-253-2

So this is Howard Reuben, and you really messed me up. I'm 91. I've got to beg for a ride because of you people.

### Response to I-253-2

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

## I-254: Anonymous

### Comment I-254-1

So I have a couple of thoughts. And the first one is: The proposal is for six stations at $6 billion; is that correct? Anyway, that's what I gather here, $6 billion for six stations. And here's -- and here's what I want to say: That's a lot of money for six stations that goes nowhere. Lambert and Washington, there's nothing there, and I never could understand this about Metro. They've always built these railroads that go nowhere at a considerable cost. That's one comment.

### Response to I-254-1

See Response to Comment I-9-2 regarding project cost. See also Response to Comment I-10-5 and Response to Comment I-50-1 regarding project need and activity centers served by the Project.

### Comment I-254-2

And the other one is: If we were to get back on to provide bus service at a more rapid headway, I think the people in the communities would utilize that more, and I think it would be cheaper, electric buses, instead of this electric railroad. And my second thought is we already have the freeways there. From East L.A., we have the 60 Freeway. And this has always been a thought in my

mind: Why not build a rail system right alongside that freeway where you don't interrupt all these other communities? The freeway's already existing. And if we could build some kind of construction, a monorail that would go into downtown Los Angeles and out into the suburbs, I think that would be something to consider. And that concludes my comment or my thoughts. Thank you.

### Response to I-254-2

See Response to Comment I-9-2 regarding project cost. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

## I-255: Tom Roblino

### Comment I-255-1

My name is Tom Roblino. I live right off of Washington Boulevard up by Rosemead, and I understand that there -- the train proposal -- of the track is going to go down the center of Washington Boulevard. It's going to eliminate one lane on each side. There's too much traffic there now. I don't know how -- what's going to happen then. That's number 1.

### Response to I-255-1

As stated in 3.14.6.1.1 of the Recirculated Draft EIR, Alternative 1 would result in a reduction in general-purpose travel lanes from three lanes to two lanes, and the elimination of ingress/egress movements at driveways and selected cross streets along Washington Boulevard. In addition, parallel east–west routes (e.g., Telegraph Road, Olympic Boulevard, Whittier Boulevard) would continue to serve as alternatives to Washington Boulevard, providing additional connections to and from the regional freeway network. As such, changes in general-purpose travel lanes would be consistent with local and regional circulation elements and plans. Therefore, operation of Alternative 1 would result in less than significant impacts related to traffic circulation. See also Response to Comment I-21-1 regarding traffic.

### Comment I-255-2

Number 2 is I heard one other gentleman say today about safety, that they're going to guarantee safety on the train. They can't do it now. What makes them think they're going to be able to do it then? I understand the homelessness is rising, a terrible epidemic that's happening now. It's going to get worse if a train comes down from L.A. down to where we live now. I've seen what happened.

### Response to I-255-2

See Responses to Comments A-8-19 and I-7-3 regarding crime, security, and people experiencing homelessness.

### Comment I-255-3

Look at the community, what happened that the gentleman was saying on First Street, how terrible it's gotten around the area. I don't want that to happen in my area. And for those gentlemen, whoever proposed to say that they're for it, I want them to ask me: How close do they live to the route? Thank you.

### Response to I-255-3

The commenter's opposition to the Project is noted. Regarding community impacts, the commenter is referred to Section 3.12, Population and Housing, and Section 3.13, Public Services and Recreation, of the Recirculated DEIR for a detailed discussion of impacts related to these resources from operation and construction of the Project. A brief summary of impacts related to these resource topics is provided below:

- Population and Housing: As identified in Section 3.12, operation and construction of the Project would result in less than significant impacts on population and housing and no mitigation is required.
- Public Services and Recreation: As identified in Section 3.13, operation and construction of the Project would result in less than significant impacts on public services and no mitigation is required.

## I-256: Maria Reyes

### Comment I-256-1

Maria Reyes (through a Spanish interpreter.) As I said in the beginning, the street where I live, there's quite a bit of traffic, a lot of trucks. In the south where I live, the south going towards north -- so about -- north of that about a block away from there, there is Metrolink. So the line -- the Metro line is going to go about -- pretty close to where I live, right in the middle of it.

### Response to I-256-1

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR or otherwise raise significant environmental issues.

### Comment I-256-2

On top of that, there's quite a bit of traffic; and besides that, we don't have any parking facility, either.

### Response to I-256-2

See Response to Comment I-21-1 regarding Project-related traffic and Response to Comment I-162-2 regarding parking at the proposed stations.

### Comment I-256-3

We have a lot of factories all around where I live. So the school is pretty close to there, close to Washington Street. And the library is across the street on Greenwood Street. So you're really presenting a very good-looking package, nothing really worth for us at all. On Washington Street, we have quite a bit of homeless people. On the weekends, on Sundays, there is a church near Washington Street.

### Response to I-256-3

See Response to Comment I-223-3 regarding vehicle and pedestrian safety. See Response to Comment I-10-5 regarding the project need. See Response to Comment A-8-19 regarding policing, security, and homelessness.

### Comment I-256-4

There's quite a bit of traffic, a lot of traffic. So we have to put up with that all the time, a lot of traffic. That's it.

### Response to I-256-4

See Response to Comment I-21-1 regarding Project-related traffic.

## I-257: Eugenia Reyes

### Comment I-257-1

E-U-G-E-N-I-A, R-E-Y-E-S. Another concern is that -- what are they going to do when they dig up everything? Where are they going to dump the -- you know, the pavement? Because I'm pretty sure they're going to take some old pavement out, put some new one, fix the street. And even when they go underneath, where are they going to dump all of that? That's a very big concern.

### Response to I-257-1

Solid waste disposal, including construction debris is addressed in Section 3.16.6.4 of the Recirculated Draft EIR. As stated therein, at least 50 percent of construction debris would be recycled as required by state law. Remaining materials that cannot be recycled or reused on-site, would be removed to a local landfill. There is sufficient land fill capacity available in Los Angeles for construction debris and impacts would be less than significant.

### Comment I-257-2

I don't see that working for our city. I think they need to go somewhere else. I am – like I said before, I am very concerned about homeless people being able to have access to move around and start building more cabinets, like -- cabinets? -- around our block. It's very busy.

### Response to I-257-2

See Response to Comment A-8-19 regarding people experiencing homelessness.

### Comment I-257-3

And just as my mother said, we also deal with the church of the Ark that's right there, a Christian church right on the corner, and these semi trucks -- they were not notified about the meetings. I went to the one in Montebello. The next day of the Montebello meeting -- not the next day, sorry, because that was a Sunday. So on Monday, I went around my block asking those companies if they were aware of the Metrolink. They said, no, they weren't. I have a feeling -- well, my thoughts and feelings is that they should have also notified them to see what is their point of view if they would like a Metro in the middle of our block, but they didn't. So I think that's very disappointing. And that's it.

### Response to I-257-3

As clarification, the Project is an extension of the Metro E Line (formerly Metro L [Gold] Line) and is not connected to Metrolink. Regarding public outreach that has been conducted for the Project, see Chapter 6, Public Outreach, of the Recirculated Draft EIR and see Response to Comment I-161-3 regarding public outreach conducted for the Recirculated Draft EIR.

## I-258: Edmond Veloz

### Comment I-258-1

Edmond Veloz. I have a little more to talk to you about. Let's see. One of the things that I've found as I'm doing this -- and this is why I talked about the Whittier city council not supporting their own people. But it wasn't just them. As I've been doing this -- I come from Montebello; okay? Now, in Montebello, there's a section between Vail Avenue and Bluff Road on Washington Boulevard. It's all businesses there, about maybe 70-some-odd businesses. When I first started this -- this was back in the fall -- I got a petition just for the businesses. I visited every single business there. Not a single one of them knew about this project. And this goes back to, like, 2007, when it was first starting to be talked about. Not a single business was told by our city council that this was coming. What's bad about that is that some of those businesses are the biggest contributors of tax income and revenues to the City, so how could it be that the City wouldn't tell them that this thing was coming? How could it be that they – and our city is in such bad shape. They desperately need that money. How could they tell the people who were helping them and then tell them – because they know it's going to be bad. It had to be the MTA got to them. But it's not just them. The same thing happened with Pico Rivera. I started circulating a petition letting them know. Nobody knew. They could hold meetings down there. We could have done that in south Montebello. They wouldn't hold a meeting down there because we had them a long time ago. People in Montebello -- they've got venues to hold them in south Pico Rivera, south of Washington Boulevard. They didn't do it. So they didn't know. I come up to Whittier. This one section between Sorenson Avenue and the Presbyterian hospital, the north side of Washington, there's a whole neighborhood, a residential neighborhood. None of them knew. The City didn't tell them.

### Response to I-258-1

The public comments received and responses to those comments are part of the Final EIR and will be taken into consideration by the decision-makers when considering certification of the Final EIR. See Chapter 6, Public Outreach, of the Recirculated Draft EIR regarding the public outreach and opportunities/methods for the public to provide input on the Project. See Response to Comment I-161-3 regarding public outreach conducted for the Recirculated Draft EIR.

### Comment I-258-2

It was collusion, collusion between – it had to be collusion between -- in my opinion, collusion between all of the cities not to tell the people because you can see it in the Environmental Impact Report that there's going to be bad things happening, and there's no way away from it. It's going to happen. Certain things are going to be permanent. Well, they didn't want them to know that. Okay. That's one thing. The last thing is the Whittier thing, it's not going to do Whittier any good anyway. It's going to end at Lambert Road.

### Response to I-258-2

Pursuant to CEQA, the Recirculated Draft EIR is a public disclosure document that objectively evaluates the environmental impacts of the Build Alternatives proposed by the Lead Agency and the No Project Alternative to inform government decision-makers and the public of the environmental effects of a proposed activity and to avoid or reduce significant impacts of the activity when feasible to do so. The Recirculated Draft EIR addresses short-term (construction) and long-term (operations) impacts.

The commenter's input on Alternative 1 which terminates at Lambert Road in the city of Whittier is noted. As described in Section 3.10, Land Use and Planning, of the Recirculated Draft EIR, Alternative 1 supports policies identified in the *Envision Whittier General Plan* that include encouraging the expansion of transit that connects the community to jobs and services, reducing congestion and GHG emissions, and supporting transit oriented development.

### Comment I-258-3

There's no real commercial area there other than maybe the Presbyterian hospital. That's not going to be that much. People from the Chamber of Commerce appeared here, from the uptown association. They appeared before the Whittier uptown. Whittier uptown is a mile and a half away from where the rail line is going to stop. How are they going to get there? It is going to do uptown Whittier absolutely no good. It's a mile and a half. How are people going to get there? They are either going to have to walk or Whittier is going to have to provide them a bus, which is what I'm suggesting. The next one is the Whittier quad, another mile and a half away. So the train ends in a place where it does Whittier no good. It's just – it just is a vanity train for them. But in the meantime, it comes through all of these neighborhoods, Pico Rivera and Montebello, and ruins our neighborhoods just so they can have a vanity train for themselves.

### Response to I-258-3

See Response to Comment I-1-4 regarding alternatives to the Project that were considered, including Uptown Whittier. See also Response to Comment CO-4-15 for additional information on alternatives considered.

### Comment I-258-4

And that's -- that's what they call environmental racism, that, you know, we're not going to -- this is going to ruin our neighborhoods, and everybody is very, very upset about it. Well, you saw them here tonight. Anyway, I don't want to tell you that. You can leave that part out. But they were here tonight, and they showed their disgust. I was very surprised at how many people were here against this project in Whittier. That's all I've got to say, I think.

### Response to I-258-4

See Response to Comment I-161-10 regarding consistency of the CEQA analysis with the 2012 California Attorney General Environmental Justice Fact Sheet.

## I-259: Miguel Perla

### Comment I-259-1

Miguel P-E-R-L-A. I'm a resident of Whittier, California, and I am here because I wanted to hear the concerns by my fellow community members and also hear about the plans. I am in favor of the extension of the Metro to Whittier, with some reservations, of course. I would love for there to be parking for all of that area that's going to be most impacted at the end of the line at Lambert and Washington Boulevard, which is a tough area as it is -- existing tough area.

### Response to I-259-1

The commenter's support for both Alternative 1 and parking facilities at the proposed Lambert station is noted. As stated in Section 2.5.1.2 of the Recirculated Draft EIR, this proposed station would provide a surface parking facility.

### Comment I-259-2

But I am in favor of this project because it's a forward-looking way to get people out of their cars and onto public transportation that doesn't pollute, that is safe. It can be beautiful, and it can connect us to different parts of Los Angeles County without having to hop in our cars. I think that's it. I think that's it.

### Response to I-259-2

The commenter's support for the Project is noted.

## I-260: Esther Celiz

### Comment I-260-1

Esther Celiz. My real concern is transportation for the pedestrians. So I don't know what that goes under. I think that chart is under Transportation. What does it go under? I have concern for the traffic, which isn't even on any of the charts. I am in Pico Rivera. It's on Washington and Passons. The stop is going to be on Washington and Rosemead. That's the stop. And you come down -- because it's all residential homes. They don't even talk about it. They aren't even bringing up Pico Rivera. So from -- I would say from Bluff, as you come down, there's no homes, and then the homes and the residential area hits on Washington and Rosemead. So you have homes on both sides. So there's a school, El Rancho High School, Rivera Middle School that the kids on Passons and Washington would be crossing, and that's what's going to be my concern. You're going to have between -- I would say the high school has around 3,000 kids, so say on average 1800 kids would be crossing Passons. Another 1200 would be in Rivera Middle School at 3:00 o'clock every day. And there's no stop right there for the train. The train is just going to be going straight. That's a big concern. In Pico Rivera, we've done two underpasses, one on Durfee and Whittier and one on Slauson and Passons, for the concern of the children, and now we're having a train come straight down Washington. So that's my concern for the people of Pico Rivera, is that that street -- they did a study for the pedestrians. The young lady explained it to me. But I don't think anybody went down there at 3:00 o'clock in the afternoon or at 7:30 in the morning when you have gridlock, parents taking their kids to school back and forth. So that's going to be a big concern, stopping on that intersection. And that's not even on that -- Passons is not even on the map, and that's a big street. That's a very important street. That's one of the main veins of Pico Rivera. That's one of our main concerns. Thank you.

### Response to I-260-1

See Response to Comment I-55-2 regarding school children crossing at the intersection of Washington Boulevard and Passons Boulevard. Regarding the commenter's statement that Passons is not on the map, it is not clear what map is being referred to. The Build Alternative maps of the Project alignment in Chapter 2 of the Recirculated Draft EIR show Passons Boulevard and label it with the street name. The maps also show and label the boundaries of Pico Rivera.

## I-261: Danny Hom

### Comment I-261-1

My name is Danny, D-A-N-N-Y. My last name is Hom, H-O-M. I'm supportive of Metro continuing development of the project on the corridor, and I want to urge Metro to really foreground

accessibility for people with disabilities who ride the system, when holding this, as much as possible. That's it.

### Response to I-261-1

The commenter's support for the Project is noted. See Response to Comment A-4-6 regarding accessibility.

## I-262: Mike Martinez

### Comment I-262-1

Hi, my name is Mike Martinez. I'm an East L.A. resident born and raised here for 43 years. I came back to East L.A. to my roots to make this community better. I've been back in East L.A. for 8 years living right in front of the Gold Line here on Third Street. Mostly I'm here to fight the inefficiency of the way this project is going. It seems like Metro is just throwing money at it. Want to run a 9-mile train, very inefficient design. I always mention this in our meetings: Why not copy New York subway station? Very efficient. Everybody rides the train over there. Same thing in Atlanta. I've been living in front of the train station -- even pre-pandemic -- and I see the cabins. They're not even halfway full. Just think of how much percentage is a lot for you of a way a train should be riding. How many riders? 20 percent? 50 percent? 60 percent? Well, I did my work, and I went into the cabins myself. I found out what's the maximum occupancy per each cabin, 75 passengers. You know how many passengers I see in front of my house every single day coming and going per cabin? 6, 6 riders each way every single day, pre-pandemic and after pandemic. That's only 3.5 percent riders. What is the inefficiency here? Not only that -- And one more thing for the people above rail, fight for them because they're going to block your streets. There was a traffic stop right in front of me, there was 21 sheriff patrol cars --

### Response to I-262-1

See Response to Comment I-13-1 regarding ridership. See Response to Comment I-9-2 regarding costs. See Response to Comment I-21-1 regarding traffic congestion.

## I-263: Martinez

### Comment I-263-1

attention: Pico Rivera, Whittier do not need or want this Project Eastside Transit metro L Line (Gold) it will be bringing a Wrecking ball right through these Communities. The Environmental inpact this project will Endanger these communities and the residence way of Life. People choose to live away from the big cities with all that nosie, crowds, busy. People move out to the subrbs arears to Enjoy the Quiet, strong bond of Neighbors, Quiet walks in the Community and the Family Life Style.

### Response to I-263-1

The commenter's opposition to the Project is noted. See Response to Comment I-4-3 regarding environmental impacts of the project.

### Comment I-263-2

Pico Rivera has last complete Two Train overpass bridge Projects to clear and free streets from Train Tracks. Safety, and the inconvenience for the community 43.5 million metro Project will take Pico Rivera backwards.

### Response to I-263-2

The comment does not pertain to the environmental analysis in the Recirculated Draft EIR.

### Comment I-263-3

Subrbs are not communities that are in high demand for rail commuters. Project will harm and bring heartship for communities:

Longer Traffic delays

Harmfull emission,

### Response to I-263-3

Regarding the project need, see Response to Comment I-10-5. Regarding environmental impacts of the Project including air quality and traffic, see Response to Comment I-4-3. See also Response to Comment I-21-1 regarding traffic impacts.

### Comment I-263-4

Noise Pollutions from trains pass Train horn blowing

Safety for Pedestrians Path and bicyclists

### Response to I-263-4

Regarding noise pollution, see Response to Comment I-55-4. Regarding pedestrian and bicycle safety, see Response to Comment A-4-7, Response to Comment A-8-23, and Response to Comment I-36-3.

### Comment I-263-5

Delay emergency vehicles path to respond Bring Trouble makers outsiders Homeless to the communities

### Response to I-263-5

See Response to Comment I-36-1 and Response to Comment I-205-9 regarding potential delays to emergency vehicles. See Response to Comment A-8-19 regarding safety and people experiencing homelessness.

### Comment I-263-6

There must be better Plan to work with the Public and communities for Ideas and the use of Funds on Transportant (work Together) Metro wants transportation for the Public, consider/Rethink: Share/use Trains Tracks available RunSide on freeways Keep Train and Tracks build only at Indrustaion areas. Build overhead Passways over Freeways. Public will drive and Park their vehicles to commute to their destinations Indrustion areas. Altenative 2: Commerce/Citadel Station los

much more achievable located: underground and Industrial area. Bussiness, Shopping, better useage to the Public. Please hear us and DO NOT bulldoze our Community.!!!!

### Response to I-263-6

The commenter's opposition to Alternative 1 and Alternative 3 is noted. Regarding other alternatives that have been considered, see Chapter 5, Comparison of Alternatives, and Appendix T for a discussion of alternatives that have been considered and withdrawn. Regarding the project need, see Response to Comment I-10-5.

## I-264: Eugenia G. Reyes

### Comment I-264-1

I don't approve of the project. Washington is more industrial, it will cause traffic. You guys can't stop the population, bringing the Metro won't solve the issue. Don't touch Montebello, Pico Rivera, Whittier – our zone, we (many residents) The reason why METRO wants it, is because you guys get money; you guys don't live on the southside and you guys don't know how it is. It's a BAD IDEA, please take your metro to the downtown L.A. area and leave us in peace. You guys (METRO) don't belong in this area.

### Response to I-264-1

The commenter's opposition to the Project is noted. See Response to Comment I-4-3 regarding general environmental impacts, Response to Comment I-21-1 regarding traffic, and Response to Comment I-10-5 regarding the project need.

## I-265: Jose Moises Martinez

### Comment I-265-1

As a homeowner & resident of Montebello for 11 years, I welcome the investment for new public transportation infrastructure, that will make this region more connected to the Metro LA area. Public transportation will hopefully reduce automotive congestion and encourage people to drive less.

### Response to I-265-1

The commenter's support for the Project is noted.

### Comment I-265-2

My main concern is that of increased traffic & impact to first responders, also noise & pedestrian safety. For this I would like to make the recommendation to go AERIAL for the entire stretch through Montebello. Aerial will also look much more modern & allow first responders to turn, make U-turn & reach all locations. Aerial will also reduce safety issues to pedestrians & children. I also recommend aerial through Pico Rivera & Whittier as well. Thank you for your work & hope to see light rail soon.

### Response to I-265-2

The commenter's preference for aerial configuration is noted. See Response to Comment A-10-5 regarding grade separation, Response to Comment I-21-1 regarding traffic, Response to Comment I-55-4 regarding noise, Response to Comment I-36-3 regarding pedestrian safety, and Response to Comment I-36-1 regarding impacts to emergency services.

## I-266: Mike Martinez

### Comment I-266-1

In the environmental report

1. Under section/page 6-18. Public Outreach "Project awareness at high visible locations along the project corridor." This was never done. 2. Page 6-18. Public Outreach. "Electronic signs" along the project corridor" This was not done.

### Response to I-266-1

For information on public outreach efforts during the Recirculated Draft EIR public review period, including the banners that were displayed, see Response to Comment I-161-3. See also Response to Comment I-193-1 regarding electronic signs and banners.

## I-267: Anonymous

### Comment I-267-1

To whom it may concern: Please, your just making a mess of these cities. 1. Congestion 2. Not appealing 3. Under construction the traffic will go into the neighborhoods. 4. Unnecessary. 5. Waste 6. Bringing in crime What are you people thinking.

### Response to I-267-1

The commenter's opposition to the Project is noted. See Response to Comment I-4-3 regarding general environmental impacts, Response to Comment I-21-1 regarding traffic, Response to Comment I-7-3 regarding crime and security, and Response to Comment I-10-5 regarding the project need.

## I-268: Roberta Torres

### Comment I-268-1

I am opposed to the Metro Train planned for Washington Blvd. I live North of Washington across from Walmart.

### Response to I-268-1

The commenter's opposition to the Project is noted.

### Comment I-268-2

(1) We already have all the trucks traveling to and from Montebello on Washington. With only 2 lanes of traffic on each side, there will be increased noise, pollution, and traffic. The traffic will be cutting off to the surfaces streets north of Washington especially to go to Paramount. Also, I live on Phaeton Ave which is double the width of a normal residential street which will allow semitrucks to turn on our street. This will create traffic all day & night.

### Response to I-268-2

The commenter's opposition to the Project is noted. See Response to Comment I-4-3 regarding general environmental impacts, Response to Comment I-55-4 regarding noise, and Response to Comment I-21-1 regarding traffic. Regarding truck traffic, the city of Pico Rivera Municipal Code Section 10.56 restricts commercial vehicles exceeding six thousand pounds (including some light-duty trucks as well as medium- and heavy-duty trucks) to operate on a state highway or a designated unrestricted street (truck route) with certain exceptions (e.g., point of origin destination to pick up or deliver goods, public emergencies, utility installation or repair,) Washington Boulevard and Paramount Avenue are designated truck routes but Phaeton Avenue is not (see Pico Rivera Municipal Code Section 10.56.030). Similarly, Carron Drive, which connects Phaeton Avenue to Paramount Boulevard is not a designated truck route. Therefore, commercial trucks are not allowed to use Phaeton Avenue.

### Comment I-268-3

(2) I have not heard or read what kind of security will be on the train. What is to stop the criminal element to travel from city to city. The train should stop running by 6 pm!

### Response to I-268-3

See Section 3.13.6.1, Public Services and Recreation, of the Recirculated Draft EIR regarding train security. Also see Responses to Comments I-7-3 and A-18-19 regarding security and crime. Regarding train operations, as identified in Section 2.5.6 of the Recirculated Draft EIR, hours of operating hours and schedules would be similar to the existing Metro E Line (formerly Metro L [Gold] Line) operations and consistent with Metro rail service design requirements.

### Comment I-268-4

(3) We already have plenty of buses that that transport people all day up & down Washington. The bus takes a person closer to their destination.

### Response to I-268-4

See Response to Comment I-10-5 regarding the project need.

### Comment I-268-5

(4) It is planned to go underground to Greenwood in Montebello. Your spending plenty of money so finish the whole route to Whittier underground.

### Response to I-268-5

The commenter's support for an underground alignment to Whittier is noted. See Response to Comment A-10-5 regarding grade separation and Response to Comment I-9-2 regarding project cost.

### Comment I-268-6

(5) Have you ever done a survey to see who will see who will ride the train (residents, etc). I have never received one.

### Response to I-268-6

Surveys were conducted as part of a series of public meetings conducted in February 2017 to raise awareness about the project and engage stakeholders. For more information on the survey methods and results, see Appendix S, Attachment A (Attachment A2 – 2017 Outreach for 2017 Post Technical Studies), of the Recirculated Draft EIR. For information on public outreach efforts during the Recirculated Draft EIR public review period see Response to Comment I-161-3. See also Response to Comment I-116-2 regarding the evaluation and screening of concepts, engineering and environmental refinements that led to the selection of the Build Alternatives evaluated in the Recirculated Draft EIR.

### Comment I-268-7

(6) It is unfortunate you put your train through low income communities, where residents either have their own car, ride the bus or city buses. The train should be continued by the 60 fwy where it would be utilized.

### Response to I-268-7

See Response to Comment I-10-5 regarding the project need and Response to Comment I-161-9 regarding Metro's consideration of social justice and equity.

As described in Section 5.3 of the Recirculated Draft EIR, the SR 60 Alternative was dismissed from consideration in February 2020 by the Metro Board as a result of significant environmental and engineering challenges. See also Response to Comment CO-4-15 and Appendix T of the Recirculated Draft EIR regarding other alignments considered in eastern Los Angeles.

### Comment I-268-8

(7) Already overbudget and eventually the homeowners and local taxes will have to fund this waste of time & money.

### Response to I-268-8

See Response to Comment I-9-2 regarding project cost and Response to Comment I-10-5 regarding the project need.

# 4.3.2.5 Other Commenters

## O-1: Residents against waste

### Comment O-1-1

We demand that Metro release a full cost benefit analysis of this project and explain why they are wasting $6.5 billion of our tax money for something the community does not want and will not use. The cost is not justified and Metro will destroy Washington Blvd.

### Response to O-1-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need.

### Comment O-1-2

Metro should fix the Gold Line that crawls through East LA on 3rd and Indiana before trying to expand a failure even more, costing us taxpayers money and headaches for 10 years for construction.

### Response to O-1-2

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need.

### Comment O-1-3

These projects always go over budget and years late too, so we will have to go through a traffic nightmare for 15 years before it opens.

### Response to O-1-3

See Response to Comment I-4-3 regarding environmental impacts. See Response to Comment I-9-2 regarding project cost.

## O-2: Metro Corruption Must Be Exposed

### Comment O-2-1

Top management at Metro know this project is a complete waste of money for the smallest benefits, returns, and public transit use possible. They are burying those facts in order to push the project through and get it built sooner regardless of facts and what the community wants and needs.

### Response to O-2-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need.

### Comment O-2-2

Metro is now hiring Ray Sosa, known as "Mister Eastside 2" for his 20 plus year history pushing the project as a consultant, to be one of the top managers at Metro, so that he can make this his number 1 priority above all other public transit needs in LA County. Not for the sake of good transit in LA County, but only in order to fulfill his lifetime goal of completing a project he worked on as a consultant for 20 years. A project he used to enrich his consulting firm by convincing Metro to complete numerous expensive studies over the last 15 years on this Eastside 2 Extension, none of which have gone anywhere because they all offer the worst possible transit solutions for the Eastside communities and cities, at the highest costs. Higher costs that his firm will benefit from when they get to complete the even more expensive engineering work for the project. Ray Sosa is being hired purely for his ties to this project and Jim de la Loza, the Chief Planning Officer at Metro and his fellow business partner and closest longtime friend from AECOM. Who will both ensure that their pet project, the most expensive possible project for the lowest ridership, will soar

to the top of Metro's priorities and become the sole focus on management and leadership, at the expense of poorer, more transit dependent residents in other corridors.

### Response to O-2-2

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-13-1 regarding ridership.

### Comment O-2-3

All with the help of "Project Manager" Jenny Cristales and Dolores Roybal, all of whom are in this purely out of their longtime friendships and promises to each other to build this Eastside 2 project before any other Metro rail project, at the expense of other corridors in higher need and at the expense of good public transit for LA County in general. They have all thrown out their professional credentials, and any background knowledge they ever had about transportation and public transit, and replaced it with a political promise to build the lowest performing $5 billion subway to the Citadel as a top priority for LA County and Metro.

### Response to O-2-3

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need.

## O-3: Metro Corruption Needs Exposure

### Comment O-3-1

Metro has turned this project into a $6 billion subway for 4,000 new riders. Where is the oversight on Metro staff to ensure they came up with the best way to spend $6 billion if it will only serve 4,000 riders?

### Response to O-3-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership. It should be clarified that the cost cited is for Alternative 1 (the full 9.0 mile alignment) and the number of riders cited is for Alternative 2 (3.2 mile IOS).

### Comment O-3-2

Metro staff claims this is an urgent transportation need, but none of their facts or data in this EIR support that claim. Not at a cost of over $1 million per rider when less expensive alternatives can serve more riders, more effectively. This is the clearest example of outright corruption at the highest levels of Metro Planning Department management.

### Response to O-3-2

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership.

### Comment O-3-3

Only the top level managers could greenlight such an absurd waste of public funds for such little gain. Lawsuits and full discovery will be needed to fully expose Metro management's corruptive

practices of developing transportation solutions that cost the most while serving the lowest amount of people and transit riders as possible. As well as to expose Metro's full ties with the Citadel Outlet Mall, which out of nowhere suddenly became the most important destination to serve with a $6 billion subway. Metro will eventually be exposed for these corrupt practices, corrupt planning, and outright misuse of public funds. Starting with the leader of the planning department, Jim de la Loza, whose primary mission is to build this project regardless of cost or benefits. Together with the help of his longtime crony and friend, Ray Sosa, from consulting firm AECOM, which has managed to profit tens of millions of dollars on this project over the past 15 years, resulting in nothing but this recirculated document pushing a $6 billion subway for 4,000 new station boardings. Ray Sosa now wants to be in charge of the Metro Planning Department so he can finally fulfill his wish of building this $6 Citadel Subway after the decade and a half he has spent planning it as a consultant. All the while, he and current Metro leadership know there are much more critical projects needed that would serve over ten times the riders, at a lower cost. Including projects in lower income transit dependent corridors where a $6 billion investment could serve over 100,000 riders on day one. This Eastside 2 Citadel Subway project is how billions in public funds get wasted on solutions that were drawn on a map by people who never ride public transit and will never ride public transit. Expensive solutions driven by senior Metro managers who drive everywhere in their private luxury cars, while complaining about traffic and transit in LA. Even though they are in control of planning and designing these transit projects they will never ride. Metro is proving with this project that their main goal and mission is not serving transit riders in the most effective manner, but rather padding the pockets of consultant firms like AECOM, and their friends that work there, who relish planning $6 billion subways anywhere they can, regardless of how useful they will be, or what those billions in public funds could otherwise go to. And they won't care one bit that bus riders are crammed on packed buses in congestion on corridors that they ignore and relegate to last priority for transit investment.

### Response to O-3-3

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership. See Response to Comment I-50-1 regarding the commenter's characterization of the Project as a subway to an outlet mall.

## O-4: Independent Third Party Audit Needed

### Comment O-4-1

An independent, third party outside Metro must do a full investigation of this project immediately to identify why Metro staff is advocating for and supporting a transit project that will cost taxpayers over $6 billion for the gain of only 4,000 new riders.

### Response to O-4-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership.

### Comment O-4-2

Citadel Outlet Mall is one of the last places in LA County that should have a subway station serving it before so many other more crucial needs, and yet Metro staff claims the Citadel needs a subway as soon as possible, before the Olympics.

### Response to O-4-2

See Response to Comment I-10-5 regarding project need. See Response to Comment I-50-1 regarding the activity centers served by the Project.

### Comment O-4-3

An independent audit and investigation would uncover severe corruption by Metro and Board Members backing their flawed analyses at any cost to the public and transit riders in LA County.

### Response to O-4-3

Comment noted.

## O-5: LA County residents against the misuse of public funds

### Comment O-5-1

This project was developed by Metro managers that do not ride public transit, avoid public transit, and constantly criticize the same transit system they are in charge of while driving alone in their luxury cars to and from their window offices at Metro every day - the epicenter of the transit universe in southern California. They are smart enough to be able to deceive the public into thinking they are doing their best to improve transit in LA County while promoting $5 billion solutions that will only benefit 4,000 riders. They could not care less if that money could be better spent on higher performing alternatives that would serve more transit riders and sooner. They could not care less about the success of public transit in LA County or throughout the Eastside cities. Their experience of LA County and the Eastside is through their car windshield. They will never have to rely on the Whittier Blvd buses or have to step foot on a Metro train outside of their job duties. They only care about their paycheck and getting a ribbon cutting for a project they will never use, on a system they will never use or have to use. Their master and commander is Fernando Dutra, the city council member of a city at the far end of the line, a city that Metro cannot reach with this project because they've decided the Citadel needs a $6 billion subway that will exhaust all funding before the line can even begin to venture further east.

### Response to O-5-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership.

## O-6: Whistleblowers Against Metro Corruption

### Comment O-6-1

Metro staff and this DEIR document fail to explain: - why the project cost has quadrupled from $1.7 billion to over $6.5 billion - whether the project benefits are commensurate with the cost of $6.5 billion - how this project performs as part of the Metro Rail network and overall system

- why this project should be a priority over projects that serve over hundreds of thousands of transit riders, 10 to 20 times the riders this project will serve

- why Citadel Mall should be the highest priority for the next $1 billion plus subway station in LA County

### Response to O-6-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership.

### Comment O-6-2

- why better bus service and BRT cannot meet the project's purpose and need, and why rail transit is necessary to serve the low demand for this project

### Response to O-6-2

See Response to Comment I-10-5 regarding project need. See Response to Comment CO-4-15 regarding the range of alternatives to the Project that have been considered.

### Comment O-6-3

- why rail transit is not being studied for busier corridors like Vermont, which has over 10 times the ridership of this project on existing bus service alone.

### Response to O-6-3

See Response to Comment I-10-5 regarding project need.

### Comment O-6-4

- why specific Board Members like Fernando Dutra are allowed to influence this project and demand it be built as a first priority for their own political benefit while ignoring all of the technical facts, data, and analyses that show this project does not need rail to serve the ridership demand

- why Fernando Dutra is allowed to advocate for this project while ignoring the needs of lower income and more transit dependent populations in other corridors on the Eastside

### Response to O-6-4

See Response to Comment I-10-5 regarding project need. See Response to Comment CO-4-15, and Chapter 5, Comparison of Alternatives, and Appendix T of the Recirculated Draft EIR regarding other alignments considered in eastern Los Angeles.

### Comment O-6-5

- why Metro's own studies show Whittier Blvd is the logical choice but has been eliminated from any consideration for better transit

### Response to O-6-5

Regarding a Whittier Boulevard alignment, as described in Chapter 5, Comparison of Alternatives, and in more detail in Appendix T of the Recirculated Draft EIR, this alternative was considered and withdrawn due to community impacts, community cohesion and street capacity impacts.

## O-7: Third Party Review Needed

### Comment O-7-1

An independent agency or group outside Metro needs to review this project, including its underestimated cost and ridership. If this project were subject to review by anyone other than Metro staff beholden to specific members of the Metro Board of Directors, they would quickly learn and reveal that this project will cost more than the $6.5 billion quoted by Metro and will serve less riders than what Metro could achieve by spending less than $6.5 billion. They could also come up with several other ways Metro could spend less money but serve more transit riders and transit needs throughout these cities and East LA.

### Response to O-7-1

See Response to Comment I-9-2 regarding project cost. See Response to Comment I-10-5 regarding project need. See Response to Comment I-13-1 regarding ridership.

# 4.3.2.6 Comments Received After Close of Comment Period

## L-1: Edmund Veloz

A submittal from Edmund Veloz was received by Metro's consultant team in late November subsequent to the closing of the public comment period. The submittal includes a cover letter and copies of signed petition forms. The content of the cover letter relevant to the Recirculated Draft EIR is largely similar to content of Comments I-234-1 through I-234-4, the preamble of the petition forms are identical to Comments I-234-13 through I-234-19. See Responses to Comments to Comment Submission I-234. The petition forms provided in each submittal included in Comment Submission L-1 contains duplicates of the forms submitted in Comment Submission I-234 provided in **Appendix A** of the Final EIR as well as 703 additional signatures.[8] Comment Submission L-1 is provided in its entirety in **Appendix A**.

[8] As identified in Response to Comment I-234, Comment Submission I-234 includes a compilation of 100 duplicated signatures. This duplicate was not included in Comment L-1.