Los Angeles County
Metropolitan Transportation Authority

West Santa Ana Branch Transit Corridor

Final EIS/EIR Appendix D: Responses to Comments Received on the Draft EIS/EIR

Metro

WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT

Final EIS/EIR Appendix D: Responses to Comments Received on the Draft EIS/EIR

Part 1

March 2024

Final Environmental Impact Statement/ Environmental Impact Report

LEAD AGENCIES: Federal Transit Administration of the U.S. Department of Transportation; Los Angeles County Metropolitan Transportation Authority

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1 INTRODUCTION

This Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the West Santa Ana Branch (WSAB) Transit Corridor Project (Project) incorporates the comments received on the WSAB Transit Corridor Project Draft EIS/EIR during the 60-day review and comment period that began on July 30, 2021, and concluded on September 28, 2021. During the public review period, the Draft EIS/EIR was made available to stakeholders, agencies, and the general public for review and comment. The Draft EIS/EIR public review period also included eight virtual (via Zoom) public engagements, including four public hearings and four virtual community information sessions. The public hearings were held to receive public comments in writing and orally (via a court reporter). During this period, Metro also hosted four virtual community information sessions to provide an opportunity for focused dialogue with the project team regarding specific topics. In total, 452 formal comments submissions (e.g., comment cards, emails, letters) were received containing approximately 2,255 individual comments during the public review period. Chapter 7 of this Final EIS/EIR describes the public outreach process and summarizes comments received during public review of the Draft EIS/EIR.

1.1 Regulatory Framework

The Code of Federal Regulations (CFR) (40 CFR 1503.4) requires that an agency preparing a final environmental impact statement under the National Environmental Policy Act assess and consider comments both individually and collectively, and respond by one or more of the means listed below, stating its response in the final environmental impact statement. Possible responses are to:

- Modify alternatives, including the proposed action
- Develop and evaluate alternatives not previously given serious consideration by the agency
- Supplement, improve, or modify its analyses
- Make factual corrections
- Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons that support the agency's position
- If appropriate, indicate those circumstances that would trigger agency reappraisal or further response

Section 15088(c) of the California Environmental Quality Act Guidelines describes the evaluation that is required in the response to comments:

> *The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be a good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.*

In order to comply with 40 CFR 1503.4 and Section 15088(c) of the California Environmental Quality Act, factual responses have been provided for all substantive comments received during the comment period, with a particular emphasis on significant environmental issues. Generally, the responses to comments provide explanation, clarification, or amplification of information contained in the Draft EIS/EIR.

1.2 Document Organization

This appendix contains copies of all comment submissions received during the comment period on the Draft EIS/EIR and Metro's responses to the comments. In order to facilitate review of the responses to comments, this appendix includes common responses that respond to issues and questions raised by a number of the comments.

This appendix is organized as follows:

- Section 1 – Introduction
- Section 2 – Common Responses
- Section 3 – Comments and Responses

Section 3 is organized by affiliation, with submissions presented in alphabetical order by commenter.

1.3 Overview of Comments and Responses

Submissions received on the Draft EIS/EIR were organized and grouped into the categories shown in Table 1-1 based on the affiliation of the commenter. Some commenters or affiliations submitted more than one submission during the comment period, in which case these were counted as separate submissions in the tally shown in Table 1-1. The comments received on the Draft EIS/EIR addressed a variety of topics. Some included general statements of support or opposition to the Project or the four Build Alternatives evaluated in the Draft EIS/EIR. Other comments offered suggestions on how to modify the Project through refinements, as well as requests for changes, clarification, and/or new or additional analysis and mitigation to the Draft EIS/EIR. Additionally, other comments expressed concern over environmental impacts and funding/cost.

Common themes of comments received are as follows:

- Project alternatives or features (e.g., alignment, stations, traction power substations, construction staging areas)
- Comments requesting grade separation of the alignment
- Comments regarding mitigation measures
- Comments regarding operation and construction activities in the Little Tokyo community
- Impacts related to displacements and acquisitions
- Impacts related to noise during operation and construction
- Impacts related to visual changes, including screening of project components on aerial structures
- Safety and security along the alignment and at stations
- Impacts related to air quality, including dust and emissions during operation and construction
- Impacts related to traffic and parking, including the provision of dedicated transit parking

Table 1-1. Commentor Affiliation

Affiliation	Number of Submissions
Federal Agencies	3
State Agencies	3
Regional Agencies	13
Elected Officials	3
Corridor Cities	12
School Districts	2
Businesses	15
Organizations	13
Improvement Districts and Joint Powers Authorities	8
Individuals	380

Source: Metro, 2023
Note: The term "submission" refers to a comment card, email, or letter containing comments.

Coordination continued after circulation of the Draft EIS/EIR with cities, agencies, and stakeholders that included discussions related to comments received on the Draft EIS/EIR as well as project updates, including design refinements and updated analysis. This coordination is documented in Section 7.8 of Chapter 7, Public Outreach, Agency Consultation, and Coordination, of this Final EIS/EIR. Refinements to the LPA made as a result of these comments and coordination are detailed in Section 2.4.3.2 of Chapter 2, Project Description/Alternatives Considered, and Appendix E, Project Refinements since Circulation of the Draft EIS/EIR, of this Final EIS/EIR.

The responses to comments describe changes made to the LPA and any updated or new analysis conducted in response to comments received or as a result of coordination with stakeholders. These changes are intended to clarify and refine the description of the Project, refine measures to minimize environmental impacts, and to ensure that the Project is carried out in a manner that minimizes environmental impacts, responds to community concerns, and is consistent with the laws and policies governing the project area and its resources. These modifications do not change the conclusions of the analysis presented in the Draft EIS/EIR and do not introduce significant new information on the Project, project impacts, or mitigation that is substantially different from what was presented and analyzed in the Draft EIS/EIR.

In some instances, a comment resulted in a need to make a change to the Draft EIS/EIR. Where a change was made, the appropriate section in which the change was made is referenced in the response. Responses reference the Draft EIS/EIR when the information needed to respond to the comment was available in the Draft EIS/EIR and remained unchanged. References to the Final EIS/EIR were used if information changed since circulation of the Draft EIS/EIR.

2 COMMON RESPONSES

Common themes emerged from the comments received on the Draft EIS/EIR. As such, common responses were developed for these frequently asked questions and comments to address broad issue areas where there was extensive public comment and to respond to the various comments in a comprehensive fashion. The text for each common response is provided here for ease of reference instead of repeating text for each individual comment received. Each common response has been assigned a unique identifier (e.g., CR-GEN-1), as summarized in Table 2-1.

Table 2-1. Common Response Identifier

Identifier	Description
CR-GEN	General common responses
CR-TRA-1	Transit parking
CR-DIS	Displacements and Acquisitions
CR-VA	Visual and Aesthetics
CR-AQ	Air Quality
CR-NOI	Noise
CR-SAF	Safety and Security
CR-EJ	Environmental Justice
CR-FIN	Funding and Financing

2.1 CR-GEN-1: Identification of the Locally Preferred Alternative

2.1.1 Summary of Comments

Comments expressing support for or opposition to a specific Build Alternative presented in the Draft EIS/EIR.

2.1.2 Response

In January 2022, the Metro Board of Directors identified Alternative 3 as the Locally Preferred Alternative (LPA) for the Project. The Metro Board also identified Los Angeles Union Station as the ultimate northern terminus for the corridor in the future. Alternative 3 is identified as the LPA in the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR). As illustrated in Table 6.2 in Chapter 6 of the Draft EIS/EIR, Alternative 3 will provide substantial benefits to transit users and reduce regional vehicle traffic. Section 6.2 of the Draft EIS/EIR provides an explanation of the considerations in identifying Alternative 3 as the recommended alternative stating that "[i]n addition to considering the effectiveness in meeting the Purpose and Need and environmental impacts and benefits, the financial capacity to construct, operate, and maintain the Project as well as strategies to fund the Project were primary considerations in determining the staff preferred alternative." As noted in Table 6.1 in Chapter 6 of the Draft EIS/EIR, total capital cost estimates for Alternatives 1 and 2 range from $8.5 to $9.5 billion (2020 dollars), depending on which maintenance and

storage facility (MSF) was included in the capital cost. Alternative 3 was estimated to cost $4.9 to $5.1 billion.

Table 3.20 in Chapter 3 of the Draft EIS/EIR provides transit performance metrics for Alternatives 1 through 4. Ridership on Alternative 3 is shown in Table 3.26 in Chapter 3 of the Draft EIS/EIR. With the completion of the Regional Connector, the LPA will provide a connection to LA Union Station via transfer at the Slauson/A Line Station to the A Line. In response to comments received on the Draft EIS/EIR, the Slauson/A Line Station was reconfigured to ease transfers to the existing A Line Station. Approximately 7,000 daily transfers are projected to occur between the LPA and the A Line. The A Line ridership increase is relatively small compared to the high overall ridership forecasted on the A Line. Transfers between lines will be accommodated by pedestrian bridges.

By direction of the Metro Board of Directors and a motion by Directors Hahn, Solis, Garcetti, Mitchell, and Dutra (File #2022-0023), Metro staff were directed to identify and evaluate a more cost-effective alignment between the Slauson/A Line Station and LA Union Station and to re-engage the community to best define a transit solution, including alignment profile, station locations, and design, that meets the changing mobility needs of Little Tokyo, the Arts District, LA Union Station, and surrounding area residents, employees, and businesses. In response to the Board motion, a standalone study, the *West Santa Ana Branch Transit Corridor Project Slauson/A Line to LA Union Station Segment Study*, is underway. This standalone study does not include discussion of the LPA, which has its own independent utility separate from the connection between the Slauson/A Line Station and LA Union Station. The standalone study is evaluating cost-effective options (underground, aerial, at-grade) for the approximately 4.5-mile segment along Alameda Street from LA Union Station to the Slauson/A Line Station, inclusive of three proposed stations (LA Union Station, Little Tokyo, and Arts/Industrial District). The study is also identifying environmental considerations for the Little Tokyo, Arts District, LA Union Station, and surrounding area residents, employees, and businesses.

Metro continues to coordinate extensively with stakeholders, the public, and Solutions Alameda Coalition to gather input and suggestions for the standalone study. The insights gained from the standalone study will inform the Metro Board's decision-making process regarding the advancement of subsequent analyses for the segment north of the Slauson/A Line Station. While Alternatives 1 and 2 identified in the Draft EIS/EIR remain under consideration, modifications to those alternatives made in response to the standalone study, or as a result of design refinements, would be the subject of a future environmental document.

2.2 CR-GEN-2: Maintenance and Storage Facility

2.2.1 Summary of Comments

Comments related to the Paramount Maintenance and Storage Facility (MSF) or stating a preference for either the Paramount MSF or Bellflower MSF.

2.2.2 Response

With the identification of the LPA in January 2022, the Metro Board included the MSF site option located in the City of Bellflower as a component of the Locally Preferred Alternative.

2.3 CR-GEN-3: Underground Alignment

2.3.1 Summary of Comments

Comments requested assessing a cut-and-cover underground alignment in various locations where the project alignment would be elevated.

2.3.2 Response

In January 2022, a Metro Board motion (Board Motion 2022-0023) directed staff to conduct an assessment of above-grade/aerial sections of the Locally Preferred Alternative (LPA) to determine if cut-and-cover could be constructed at lower cost. In response to the Board motion, Metro completed the Cut-and-Cover Analysis Memo (Metro 2022). The study evaluated a cut-and-cover alignment at six locations where the LPA would be aerial based on the Draft Environmental Impact Statement/ Environmental Impact Report (EIS/EIR). For each of the six locations, Metro prepared conceptual designs and performed an evaluation focusing on construction constraints, cost estimates, and potential environmental impacts.

The analysis revealed significant design constraints, primarily due to existing major utility networks and the necessity to maintain existing freight rail traffic. The cost implications of these constraints were substantial. The study showed that, in 2022 dollars, a cut-and-cover design would result in an increase in project costs ranging from an additional $28 million to $949 million when compared to the aerial alignments. When adjusted to projected year of expenditure costs, this increase translated to approximately $45 million to $1.6 billion.

Following the completion of the study, Metro staff presented the findings to representative cities, the Transportation Advisory Committee, and Eco-Rapid Transit, ensuring that stakeholders were informed of the results of the study. After careful consideration of the study's findings, staff prepared an informal report to the Board determining that a cut-and-cover alignment is not a feasible alternative for the LPA due to the significant cost increases identified.

2.4 CR-GEN-4: Grade Separation

2.4.1 Summary of Comments

Comments requested grade separating the alignment where the Draft EIS/EIR alignment was proposed at-grade.

2.4.2 Response

The Metro Board-approved Grade Crossing Safety Policy for Light Rail Transit, prepared in December 2003 and revised in October 2010, was used to determine locations for grade separation for the Project. This policy provides a systemwide standard methodology in Los Angeles County to determine whether grade crossings along light rail transit (LRT) lines should be grade separated or at-grade. Key factors in evaluating the need for a grade separation include traffic volumes, train frequency, safety considerations, and a variety of special circumstances (e.g., vertical engineering alignment considerations, effects on traffic operations, pedestrian activity, and adjacent land uses). Based on the Metro Grade Crossing Policy, areas that satisfied the grade separation criteria along the LPA alignment were identified and evaluated. The location of grade separations was also determined in coordination with the California Public Utilities Commission (CPUC).

Metro continues to coordinate with the CPUC to identify design requirements where the LRT alignment passes through intersections at grade. Coordination will continue through the design phases of the Project, and approvals from CPUC will be required prior to operation.

2.5 CR-GEN-5: Mitigation Measures

2.5.1 Summary of Comments

Comments regarding the implementation and recommendation of feasible mitigation measures.

2.5.2 Response

Section 102 of the National Environmental Policy Act (NEPA) establishes procedural requirements, applying that national policy to proposals for major federal actions significantly affecting the quality of the human environment by requiring federal agencies to prepare a detailed statement on: (1) the environmental impact of the proposed action; (2) any adverse effects that cannot be avoided; (3) alternatives to the proposed action; (4) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity; and (5) any irreversible and irretrievable commitments of resources that would be involved in the proposed action (42 United States Code 4332(2)(C)). NEPA does not require the decision-making agency to mitigate every project effect.

The California Environmental Quality Act (CEQA) has similar, yet distinct, requirements. CEQA mandates that agencies must avoid or reduce the significant environmental impacts of projects they carry out or approve wherever feasible (Public Resources Code [PRC], § 21002). To that end, an Environmental Impact Report (EIR) must identify the significant environmental effects of the project, identify alternatives to the project, and indicate the manner in which those significant effects can be avoided or mitigated (PRC, § 21002.1(a), CEQA Guidelines, § 15126.4). Unlike measures in a Mitigated Negative Declaration, mitigation measures in an EIR need not reduce a significant impact to a less than significant level. But, if a project's significant impacts are not avoided or substantially lessened by feasible mitigation, in considering whether to approve the project, the lead agency must balance the economic, legal, social, technological, or other benefits of the project against its significant environmental impacts. If the agency determines that the benefits of the project outweigh its significant environmental effects, the agency may approve the project, but before doing so, must prepare and adopt findings and a statement of overriding considerations articulating the agency's rationale for proceeding with the project despite its significant and unavoidable environmental effects. The statement must be based on information in the EIR and/or other information in the record and supported by substantial evidence in the record (CEQA Guidelines, § 15093).

The Federal Transit Administration and Metro's application of mitigation to the West Santa Ana Branch Transit Corridor Project is consistent with the requirements of NEPA and CEQA. For each significant impact identified, the Draft and Final EIS/EIRs identify feasible mitigation measures that would avoid or minimize the significant environmental effects. Because feasible mitigation measures do not exist to reduce each of the Project's effects to a less than significant level, the Metro Board will need to adopt findings and a statement of overriding consideration in order to approve the Project.

2.6 CR-GEN-6: Little Tokyo

2.6.1 Summary of Comments

Comments regarding operation and construction activities in the Little Tokyo community.

2.6.2 Response

In January 2021, Metro Board identified:

- Slauson/A Line to Pioneer as the Locally Preferred Alternative (LPA) and focus of the Final EIS/EIR
- LA Union Station as the ultimate northern terminus for the corridor, inclusive of a station in Little Tokyo

The LPA's northern terminus will be at the Slauson/A Line Station located approximately 4 miles south of Little Tokyo. Construction activities will not involve off-road equipment or on-road trucking activities within several miles of the Little Tokyo neighborhood.

As discussed in response CR-GEN-1, by direction of the Board, a separate study is underway to determine cost-effective alignments between LA Union Station and the Slauson/A Line Station, inclusive of a station in Little Tokyo. The *West Santa Ana Branch Transit Corridor Project Slauson/A Line to LA Union Station Segment Study* includes developing the Little Tokyo Station location and access, in collaboration with the Little Tokyo and surrounding communities. This effort also includes re-engaging the community, stakeholders (including property owners and business owners), and Solutions Alameda Coalition in the study process to best define a transit solution, including alignment profile, station locations, and design, that meets the changing mobility needs of Little Tokyo, the Arts District, LA Union Station, and surrounding area residents, employees, and businesses. The alignment north of the Slauson/A Line Station would be the subject of a future environmental document once an alignment and funding sources are identified.

2.7 CR-GEN-7: Alternative 2

2.7.1 Summary of Comments

Comments in favor of Alternative 2.

2.7.2 Response

Chapter 6 of the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) considers the trade-offs among the alternatives. As illustrated in Table 6.2 in the Draft EIS/EIR, Alternative 3 would provide substantial benefits to transit users and reduce regional vehicle traffic, but to a lesser extent than Alternative 2. Section 6.2 of the Draft EIS/EIR provides an explanation of the considerations in identifying Alternative 3 as the recommended alternative stating that "[i]n addition to considering the effectiveness in meeting the Purpose and Need and environmental impacts and benefits, the financial capacity to construct, operate, and maintain the Project as well as strategies to fund the Project were primary considerations in determining the staff preferred alternative." After public distribution of the Draft EIS/EIR and considering public comment, the Metro Board of Directors identified Alternative 3 as the Locally Preferred Alternative, but LA Union Station was identified as the ultimate northern terminus for the Project. Alternative 3 would provide connection to 7th Street/Metro Center via transfer at the Slauson/A Line Station to the A Line.

2.8 CR-TRA-1: Transit Parking

2.8.1 Summary of Comments

Comments related to additional transit parking and/or spillover parking impacts.

2.8.2 Response

The Locally Preferred Alternative (LPA) proposes five stations with dedicated transit parking: Firestone Station, I-105/C Line Station, Paramount/Rosecrans Station, Bellflower Station, and Pioneer Station. Dedicated transit parking is not proposed at the remaining four stations (Slauson/A Line Station, Pacific/Randolph Station, Florence/Salt Lake, and Gardendale Station). These locations are unchanged from the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). The locations of dedicated parking facilities were aimed at distributing parking demand across the corridor efficiently.

In response to comments received on the EIS/EIR requesting that additional transit parking be considered, Metro completed a Transit Parking Study that carefully considered whether dedicated transit parking should be added to one or more of the four transit stations without dedicated transit parking. In addition, the study examined whether the parking supply at the transit stations with proposed parking would be sufficient to meet transit parking demand. The study also explored potential sites that could be used for parking near the four stations that do not include parking facilities, but the use of these sites was not recommended because they would require substantial additional property acquisition for the Project and are not necessary to meet the Project's transit parking demands.

Metro used its Travel Demand Model to forecast parking demand at the nine stations along the LPA. This information was then used to estimate the total demand for transit-related parking across the corridor. The findings indicate that, should transit parking demand reach peak projection at peak hours, there would be a shortage of approximately 10 parking spaces, combined across the parking supply at the five transit parking facilities. However, when the forecast of transit parking demand is restricted to the five stations with transit parking, consistent with the Draft EIS/EIR, a surplus of 50 parking spaces was projected.

The shift in demand indicates that at stations where transit parking is not proposed, it is anticipated that commuters desiring to park and ride will adapt by using a station with dedicated transit parking or by finding another way to complete their trip. At stations where transit parking is proposed, it is possible that parking would occasionally reach capacity. Over time, commuters are expected to modify their travel habits, such as shifting to other modes (e.g., kiss and ride, bicycle, or transit) to access the station, driving to a station with available parking supply, or driving to their ultimate destination. The analysis of spillover parking in Chapter 3, Section 3.4.4, of the Final EIS/EIR and in Section 5.4 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* has been updated since the Draft EIS/EIR and includes the forecasted parking demand at all nine stations in addition to the forecasted demand restricted to the five stations with transit parking. The analysis was also updated to no longer rely on available on-street parking where the demand for transit parking is forecasted to exceed supply. Removing availability of on-street parking as a consideration for transit parking provides a more conservative approach to the analysis of potential impacts related to spillover parking at the stations because it does not assume that demand could be met by using on-street parking, if available.

As stated above, spillover parking is not expected to occur because it is anticipated that over time drivers will shift to stations with available dedicated transit parking or find other ways to make the trip. The decision not to include additional transit-dedicated parking facilities is also driven by Metro's commitment to fiscal responsibility and sustainable urban development. Building and maintaining large parking lots is costly and can detract from the walkability and community-oriented design of station areas.

With implementation of Mitigation Measure TRA-19 (Parking Monitoring and Community Outreach) (referred to as Mitigation Measure TRA-21 in the Draft EIS/EIR), an assessment will be conducted to monitor on- and off-street parking activity resulting from operation of the Project. Surveys will be conducted within one-half mile of each station to compare parking availability prior to the start of service to the availability six months following the start of service. In locations where parking demand is at least 20 percent greater than the demand before prior to the start of service, Metro will work with the appropriate local jurisdiction, business owners, and affected communities to assess the need for an appropriate on-and off-street parking management program. Metro will also coordinate with and support jurisdictions in outreach meetings within the affected communities to gauge the interest of residents participating in a residential permit parking program. Additionally, Metro may implement a parking fee, consistent with the Supportive Transit Parking Program Master Plan, which would further control demand. Refer to Chapter 3, Section 3.5.2.4 in the Final EIS/EIR for additional information on Mitigation Measure TRA-19 (Parking Monitoring and Community Outreach).Although it is anticipated that parking demand will be accommodated, it should be noted that an awareness is emerging among policy experts and public agencies that parking shortages near transit stations can provide environmental benefits. First, if there is not an over-abundance of parking spaces, people are encouraged to use public transportation instead of personal vehicles, reducing traffic congestion and associated emissions. Additionally, parking shortages near transit stations can promote walking and cycling, further reducing carbon emissions and improving air quality. Overall, a shift away from car-centric infrastructure aligns with the principles of sustainable urban planning. Recent legislation—most notably, Assembly Bill 2097, which prohibits public agencies from imposing or enforcing minimum parking requirements on development projects located within a half mile of a major transit stop—underscores California's dedication to prioritizing transit over personable vehicle usage.

It should also be noted that the California Environmental Quality Act does not require an analysis of or mitigation measures for parking shortages; an EIR is only required to address parking shortages to the extent the shortage has secondary impacts on the environment. (*Save Our Access-San Gabriel Mountains v. Watershed Conservation Authority* (2021) 68 Cal.App.5th 8.) No such secondary impacts have been identified.

Prior to circulation of the Draft EIS/EIR, Metro coordinated with the City of Artesia in support of parking focused on the design of the Pioneer Station parking structure. Metro has continued coordination efforts with stakeholders regarding on- and off-street parking, transit parking demand, spillover parking, parking mitigation measures, and/or transit parking facility design after the release of the Draft EIS/EIR. Chapter 7 of the Final EIS/EIR summarizes coordination with corridor cities.

2.9 CR-DIS-1: Process for Acquisitions and Relocations

2.9.1 Summary of Comments

Comments regarding the acquisition and/or relocation process.

2.9.2 Response

The Project will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 United States Code Section 61) (Uniform Act), California Relocation Act (Government Code Section 7260 et seq.), policies and procedures of Metro, and other applicable regulations related to displacements and acquisitions. Metro will provide relocation assistance and compensation for eligible displaced businesses and residences as required under the Uniform Act and California Relocation Act. Where acquisitions and relocation are unavoidable, the Federal Transit Administration and Metro will follow the provisions of both Acts, as amended; however, there will be no duplication of benefits. Metro will appraise any project-required right-of-way to determine the fair market value and set just compensation. Just compensation will not be less than the approved appraised value. Businesses and residents displaced as a result of the Project will be given advance written notice and informed of their eligibility for relocation assistance and payments before being required to move.

2.10 CR-DIS-2: Acquisitions and Displacement Data

2.10.1 Summary of Comments

Comments regarding the acquisition and displacement data for the LPA.

2.10.2 Response

Permanent and temporary acquisitions and displacements were discussed in Chapter 4, Sections 4.3 and 4.19.3.2, respectively, of the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) and in greater detail in the *West Santa Ana Branch Transit Corridor Project Final Displacements and Acquisitions Impact Analysis Report* (Appendix H to the Draft EIS/EIR).

Chapter 4, Section 4.3 and Section 4.19.3.2 of the Final EIS/EIR focuses on acquisitions and displacements required for the LPA (evaluated as Alternative 3 in the Draft EIS/EIR). Appendix A, Acquisitions and Displacements Parcel Data, and Appendix B, Acquisitions and Displacements Figures, of the *West Santa Ana Branch Transit Corridor Project Final Displacements and Acquisitions Impact Analysis Report*, provides the details for each parcel that will be affected by the LPA.

Metro developed an interactive map of the Project to enhance the public's understanding of key project features, including acquisitions and displacements, which can be found at https://www.metro.net/projects/west-santa-ana/. The Interactive Mapping interface has been updated with the acquisitions and displacements for the LPA consistent with the Final EIS/EIR.

2.11 CR-VA-1: Visual and Aesthetics

2.11.1 Summary of Comments

Comments regarding privacy at residences adjacent to aerial portions of the project alignment.

2.11.2 Response

Project Measure VA PM-8 (Residential Screening for Aerial Structures) has been added to Chapter 4, Section 4.4.4.1 of the Final Environmental Impact Statement/Environmental Impact Report, as well as Section 8.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report*. This project measure will provide privacy screening elements to limit views of project components on the aerial structures from residential backyards. The text of the measure is as follows:

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

In addition to this project measure, the aerial structures will follow the Metro Rail Design Criteria (MRDC) or equivalent criteria, which require aerial structures to be "slim, not bulky." The MRDC requires that the materials and surface textures of aerial structures be selected in accordance with generally accepted architectural principles, in collaboration with project stakeholders, to achieve an effective integration between structures and their surrounding environment. Landscaping will be used, as appropriate and as practicable, to achieve this integration. The MRDC also requires the use of landscaping on soundwalls and retaining walls, as appropriate, for graffiti management. The Project will also follow the West Santa Ana Branch Transit Corridor Urban Design Guide, and will include landscaping, such as vines or a landscape buffer, on or along mechanically stabilized earth walls and soundwalls where feasible. This landscaping presents opportunities for local representation as vine material and/or plant selection can vary by community. Landscape design and coordination will be refined as design advances. Metro will coordinate with corridor city staff per executed Master Cooperative Agreements. The Master Cooperative Agreements provide cities the opportunity to review design packages and provide comments.

2.12 CR-AQ-1: Dust Emissions (Construction)

2.12.1 Summary of Comments

Comments regarding fugitive dust emissions during construction.

2.12.2 Response

Dust emissions generated by project construction activities will primarily come from construction equipment moving on unpaved ground surfaces within the construction area footprint. Dust emissions will be minimized by mandated compliance with the South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust) and Rule 402

(Nuisance). The construction contractor is mandated to comply with SCAQMD Rule 403 related to the control of fugitive dust, as well as all best management practices contained within the Metro Green Construction Policy (now referred to as Project Measure AQ PM-1 in Section 4.19.3.5 in Chapter 4 of the Final Environmental Impact Statement/Environmental Impact Report [EIS/EIR]). These requirements include, but are not limited to, control strategies such as the application of water or dust suppressants to unpaved areas to maintain soil moisture content and limiting vehicle speeds on unpaved areas to 15 mph.

The Draft EIS/EIR addressed localized emissions from various types of construction sites involved in construction of the Project. The localized emissions analyses presented in Tables 4.19.14 through 4.19.19 in Section 4.19.3.5 of the Draft EIS/EIR state that emissions from on-site construction sources will not exceed applicable SCAQMD thresholds at any type of construction site involved in project construction, which serves as a screening approach to evaluating the possibility of unhealthy pollutant concentrations occurring throughout nearby communities. The results of the localized emissions analyses substantiate that emissions from sources located within construction sites will not create adverse air quality conditions in nearby communities. As shown in Tables 4.19.14 through 4.19.19, compliance with these regulatory best management practices will effectively control fugitive dust emissions to levels below the applicable localized significance threshold values established by the SCAQMD to prevent the occurrence of elevated dust concentrations near construction sites. Therefore, dust emissions from sources located on the construction site will remain less than significant under the California Environmental Quality Act.

The existing condition in the project corridor includes dust generated by on-road vehicle movements on the freeway and arterial streets, and by freight trains. Construction-related trips generated by the Project will not result in a cumulatively significant impact related to dust emissions because the Project's incremental increase in vehicle volumes will be minimal. Moreover, the Project will implement best management practices to reduce on-road vehicle dust emissions during construction, including:

- Maintaining a 12-inch freeboard height and tarp cover for all trucks hauling bulk materials
- Installing and using a wheel-washing system to remove bulk material from tires and vehicle undercarriages at site access points, and/or installing a pad consisting of washed gravel at each vehicle egress from the site to a paved public road

Additionally, provisions of the Metro Green Construction Policy require that the following best management practices related to construction traffic be implemented at a minimum:

- Maintain a buffer zone that is a minimum of 1,000 feet between truck traffic and sensitive receptors, where feasible
- If feasible and as allowed by local jurisdictions, configure construction parking to minimize traffic interference
- Enforce truck parking restrictions, where applicable
- Prepare haul routes that conform to local requirements to minimize traversing through congested streets or near sensitive receptor areas
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable

- Use construction equipment with engines meeting Tier 4 Final emissions standards and use haul trucks that comply with 2007 U.S. Environmental Protection Agency on-road emissions standards for particulate matter and NO_X

Each of these strategies will contribute to the control of fugitive dust emissions from construction vehicles and reduce the likelihood of dust plumes reaching sensitive receptors. As discussed in Chapter 4, Section 4.5.1.2 of the Draft EIS/EIR, the impact analysis was completed in accordance with guidance established by the SCAQMD and the Federal Transit Administration. The results show that Alternative 3 (identified as the Locally Preferred Alternative in the Final EIS/EIR) will not generate emissions that exceed the regional or localized significance thresholds established by the SCAQMD.

If a nuisance condition arises during construction of the Project related to visible dust plumes, odorous emissions, or other conditions, complaints may be submitted to the SCAQMD. Emissions of air pollutants produced during construction of the Project will be temporary in nature and will not cause long-term effects to air quality.

2.13 CR-AQ-2: Dust Emissions (Operation)

2.13.1 Summary of Comments

Comments regarding fugitive dust during project operations.

2.13.2 Response

Existing particulate matter emissions and dust deposition are not related to the environmental effects of the Project itself. Future operation of the Project will result in a net decrease in particulate matter and dust emissions at the regional scale relative to the No Build Alternative, as shown in Table 4.5.12 in Chapter 4 of the Draft Environmental Impact Statement/ Environmental Impact Report (EIS/EIR). Additionally, ambient particulate matter concentrations and resulting dust deposition are anticipated to decrease between the existing environmental setting (2017) discussed in Chapter 4, Section 4.5.2 of the Draft EIS/EIR and the horizon year of 2042 as a result of future implementation of control strategies outlined in the South Coast Air Quality Management District 2016 Air Quality Management Plan.

Regarding particulate emissions from freight train movements, implementation of the Project will not increase freight train activities at any location along the project alignment. Review of observational counts taken at various points along the right-of-way indicate that existing average daily train passbys are only one or two per day. Any potential increases in freight activity would be separate from the West Santa Ana Branch Project. Furthermore, relocating the existing train tracks by a distance of 15 to 20 feet will not increase particulate emissions from freight train movements and will not substantially alter dust deposition from those movements.

The Project will be propelled by electricity, which produces negligible emissions of particulate matter compared to diesel-powered freight trains as there is no source of combustion emissions. The only source of particulate emissions associated with operation of the Project within the corridor will be associated with brake friction dust resulting from friction between the rail car wheels and the tracks due to the cars being powered by electric propulsion and not diesel-fueled internal combustion engines, which will be minimal. Emissions of brake friction dust are reduced relative to diesel-powered trains because

primary braking is regenerative through the electric motors of light rail transit vehicles. Therefore, operation of the Project will not result in significant environmental impacts related to dust generation.

2.14 CR-AQ-3: Air Quality Impacts and Thresholds

2.14.1 Summary of Comments

Comments regarding regional and/or localized air quality impacts, including thresholds, guidance, and Metro-related policy.

2.14.2 Response

As discussed in Chapter 4, Section 4.5.1.2 of the Draft Environmental Impact Statement/ Environmental Impact Report (EIS/EIR), the air quality impact analysis was completed in accordance with guidance established by the South Coast Air Quality Management District (SCAQMD) and the Federal Transit Administration. The results indicate that operation of Alternative 3 (referred to as the Locally Preferred Alternative in the Final EIS/EIR) will not generate emissions that exceed the regional or localized significance thresholds established by the SCAQMD. Therefore, operation of Alternative 3 will not result in significant impacts under the California Environmental Quality Act or adverse impacts under the National Environmental Policy Act.

Metro also requires compliance with and enforcement of the Green Construction Policy (now referred to as Project Measure AQ PM-1 in Section 4.19.3.5 in Chapter 4 of the Final EIS/EIR) to be included in construction contracts and be implemented as feasible, which will minimize emissions. Metro adopted the Green Construction Policy in 2011 to reduce environmental impacts from construction activities associated with Metro projects. The policy provides requirements for identifying and mitigating air emission impacts on human health, the environment, and the climate of on-road and off-road construction equipment and generators used in construction and development activities; implementing appropriate best management practices to complement equipment mitigations; and implementing strategies to ensure compliance with applicable rules and regulations.

Best management practices in the Green Construction Policy include, but are not limited to: maintaining equipment according to manufacturer's specifications; restricting idling of construction equipment and on-road heavy-duty trucks to a maximum of five minutes when not in use; use of diesel particulate traps as feasible; configuration of haul routes to conform to local requirements to minimize traversing through congested streets, near sensitive receptor areas, and during peak traffic periods; and limiting traffic speeds on unpaved roads to less than 15 mph.

The Green Construction Policy also includes requirements for off-road construction equipment to meet Tier 4 off-road emission standards where feasible or be outfitted with Best Available Control Technology devices; compliance with federal on-road emission standards for on-road heavy-duty diesel trucks or equipment with a gross vehicle weight rating of 19,500 pounds or greater; and for the utilization of grid-based electric power at any construction site where feasible. These best management practices and control strategies will minimize pollutant emissions to the maximum extent feasible and represent some of the most stringent and effective methods to reduce air pollutant emissions associated with construction activities.

2.15 CR-NOI-1: Noise Impact Standards

2.15.1 Summary of Comments

Comments regarding standards used for the noise impacts analysis and proposed mitigation measures to reduce noise levels during project operation.

2.15.2 Response

The operational noise and vibration analysis was included in Chapter 4, Section 4.7 in the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). The impact analyses were prepared in accordance with the Federal Transit Administration (FTA) 2018 Transit Noise and Vibration Impact Assessment Manual, which is the guidance used for EIS/EIR documents for which FTA is the federal lead agency. This manual contains a comprehensive analysis methodology of the potential noise and vibration effects of transit projects, including light rail transit (LRT) train movements and station activities, special trackwork, relocated freight tracks, new or modified grade crossings, and traction power substations. The manual includes methodology for an assessment of daytime and nighttime noise at residences and other noise-sensitive locations.

Noise-sensitive uses were identified for analysis within the Draft EIS/EIR for consideration in the noise analysis. Sensitive land uses, such as residences and parks within 350 feet of the project alignment, were divided into clusters, depending on the similarity of existing noise conditions, distance to the alignment, light rail system operating parameters, trackwork, and light rail speed along the alignment. Clusters represent a modeling unit that have similar existing noise levels and will experience similar noise levels generated by the Project. Distances were conservatively measured from the nearest representative sensitive land use within the cluster. All sensitive land uses identified within the FTA screening distances were assigned to a cluster for consideration in the analysis.

The Draft EIS/EIR included project-generated noise levels that were calculated by frequency of service during different times of day and the relative distance of sensitive receptors from the Project. During nighttime hours, the project-related noise levels were “penalized” with an additional weighting to account for increased sensitivity during nighttime hours. The existing noise measurements used to establish the FTA noise impact criteria included 24-hour noise measurements that captured both daytime and nighttime ambient noise levels and daytime 1-hour representative short-term noise measurements.

Permanent operational activities will generate noise and vibration. Noise impacts have been predicted based on the total operational frequency of the LRT over a 24-hour period, and mitigation has been identified to reduce noise levels to the extent practicable. Noise and vibration mitigation measures are identified in Section 4.7.4.2 of the Draft EIS/EIR to reduce potentially significant noise and vibration effects that will occur during construction activities and during operations. In response to comments and to reflect changes in design made since circulation of the Draft EIS/EIR, the Final EIS/EIR includes refined mitigation measures to reduce potentially significant noise and vibration effects that will occur during operations. The soundwall design at at-grade crossings was refined to bring the edge of the soundwall to the pedestrian crossing in order to minimize the gap in the soundwall and increase noise reduction benefits for adjacent sensitive receivers. Regarding soundwall heights, maximum heights considered in the Draft EIS/EIR were 4 feet for soundwalls on the aerial structure and 8 feet for soundwalls at-grade. The maximum soundwalls heights considered for the LPA

are 12 feet on the aerial structure and 16 feet at-grade. Mitigation Measures NOI-1 (Soundwalls) through NOI-5 (Freight Track Relocation Soundwalls) will be implemented to reduce operational noise levels to the extent feasible.

Mitigation Measure NOI-1 (Soundwalls) and NOI-5 (Freight Track Relocation Soundwalls) work by blocking the direct path of noise from the noise source, such as the LRT, to the sensitive receptor. Standard non-absorptive soundwalls are capable of reducing noise levels up to 12 dB at sensitive receptors. The height and length of the soundwall is dependent on the relative location and height of the source and sensitive receptor.

Mitigation Measure NOI-2 (Low Impact Frogs) will eliminate the "clickety-clack" noise associated with the crossovers which, as part of the noise model, results in a +5 dB addition to affected receptors. The mitigation will reduce the overall LRT noise level by 5 dB at receptors affected by crossovers.

Mitigation Measure NOI-3 (Wheel Squeal Noise Monitoring) will require noise monitoring to occur prior to the start of revenue operations to determine if wheel squeal is occurring at curves with the potential for wheel squeal. If wheel squeal is identified, then wayside lubricators shall be installed to lubricate the wheels and eliminate wheel squeal. The +10 dB addition at affected receptors will then be removed by the mitigation and the overall LRT noise level will be reduced by 10 dB at affected curves.

Draft EIS/EIR Mitigation Measures NOI-4 (Crossing Signal Bell Shrouds) and NOI-5 (Gate-Down-Bell-Stop Variance) were recommended to further reduce noise at grade crossings within the Draft EIS/EIR, but reductions were not accounted for in the analysis due to the requirement for California Public Utilities Commission (CPUC) approval. Subsequent to the circulation of the Draft EIS/EIR, Metro coordinated with CPUC regarding these mitigation measures. Since circulation of the Draft EIS/EIR, Mitigation Measures NOI-4 and NOI-5 have been incorporated as Project Measures NOI PM-1 and NOI PM-2, respectively), and their associated noise reductions are included in the Final EIS/EIR in Section 4.7 based on Metro experience implementing these measures on other projects and coordination with CPUC subsequent to circulation of the Draft EIS/EIR. Crossing signal bell shrouds partially enclose the crossing signal bells at at-grade crossings. The bell shrouds direct crossing signal noise toward the at-grade crossing and away from sensitive receptors located adjacent to the crossing. A Gate-Down-Bell-Stop Variance will allow Metro to stop crossing signal bell ringing once the crossing gates have completely lowered. This reduces the duration of crossing signal ringing and reduces the overall noise exposure generated by the bells.

Final EIS/EIR Mitigation Measure NOI-4 (TPSS Noise Reduction) requires implementation of noise reduction measures at TPSS sites that were identified to exceed FTA noise impact criteria (this measure was referred to as Mitigation Measure NOI-6 in the Draft EIS/EIR). This mitigation measure requires Metro to reduce TPSS noise to a level below the FTA noise impact criteria. Available noise reduction measures include orienting cooling fans and HVAC equipment away from sensitive receptors, using quieter cooling fans or HVAC equipment, installing an enclosure around the TPSS unit, installing baffles, or providing sound insulation of the TPSS unit enclosure.

Although mitigation measures will be implemented to reduce noise levels to the maximum extent feasible where noise impacts were identified, residual impacts will remain at sensitive receptors, as identified in Chapter 4, Section 4.7.4.2 of the Final EIS/EIR.

Overall, the refinements in noise modeling, including implementation of Project Measures NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop-Variance) and refinements of the soundwall heights and locations, have reduced the number of residual impacts compared to the residual impacts for Alternative 3 presented in the Draft EIS/EIR from 101 moderate impacts to 31 moderate impacts and 59 severe impacts to 4 severe impacts for LRT noise without the design option. The Locally Preferred Alternative with the design option will result in 33 moderate impacts and 2 severe impacts remaining after mitigation. Regarding the sensitive uses affected by the combination of LRT noise with freight noise, the number of residual impacts compared to Alternative 3 will be reduced from 37 moderate impacts to 31 moderate impacts and 11 severe impacts to 1 severe impact.

2.16 CR-NOI-2: Construction Noise

2.16.1 Summary of Comments

Comments regarding the construction noise analysis.

2.16.2 Response

The construction noise analysis was provided in Chapter 4, Section 4.19.3.7 of the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). Construction activities will generate noise that may exceed the Federal Transit Administration noise criteria. Noise and vibration mitigation measures are identified in Section 4.7.4.2 of the Draft EIS/EIR. Final EIS/EIR Mitigation Measure NOI-6 (Noise Control Plan) requires the preparation of a Noise Control Plan that will be implemented during construction to reduce construction noise impacts to the extent feasible (this measure was referred to as NOI-8 in the Draft EIS/EIR). Construction noise levels will be temporary disruptions and are not anticipated to reach noise levels that will inhibit use of community facilities and residential properties. As part of Mitigation Measure NOI-6, the construction contractor will conduct noise monitoring to ensure compliance with contract noise limits to limit excessive construction noise. Metro and the construction contractor are contractually required to implement these measures.

2.17 CR-SAF-1: Security Features

2.17.1 Summary of Comments

Comments related to security and crime prevention along and surrounding the project alignment and at stations.

2.17.2 Response

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.

2.18 CR-SAF-2: Homeless Outreach

2.18.1 Summary of Comments

Comments related to homelessness on the Metro system.

2.18.2 Response

Metro's Board and Chief Executive Officer have prioritized addressing homelessness on transit through a holistic approach, putting human-centered, trauma-informed care at the core. 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 transit services Metro has in operation.

Metro continues to work in coordination with partners from local authorities to address issues affecting the transit system and will continue to seek housing and services for persons experiencing homelessness during operation of the Project.

Metro will dedicate resources to address homelessness on the transit system and is working with the County and the Los Angeles Homeless Services Authority to bring more outreach and resources to Metro stations.

2.19 CR-SAF-3: Law Enforcement

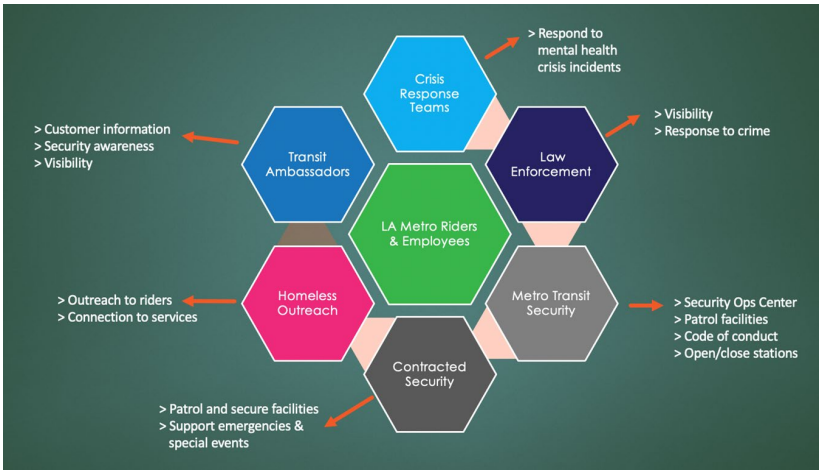
2.19.1 Summary of Comments

Comments related to security patrols and enforcement.

2.19.2 Response

Metro's multi-layered safety and security model includes law enforcement contract services, private security contract services, and Metro Transit Security. They work in tandem to secure Metro's trains, buses, stations, platforms, and other Metro properties. Metro's law enforcement partners address criminal acts on the system and, as part of their contractual key performance indicators, are to provide prompt response to calls for service. Private security contract services provide infrastructure protection of Metro properties, such as stations, and are an augmented force to aid in special events. Metro Transit Security performs Code of Conduct enforcement, such as fare compliance, and responds to Transit Watch App reports submitted by riders. This layered model allows for the effective

deployment and coordination of safety and security resources across the system and will be implemented for the Project and any future expansion of the Metro system.



Metro is currently expanding additional safety initiatives

- Upgrading closed-circuit television (CCTV)
- Installing emergency blue light call boxes
- Implementing the Metro Transit Watch App
- Increasing the number of Transit Security Officers
- Increasing the number of Homeless Engagement and Crisis Intervention Teams

2.20 CR-SAF-4: Safe Operations

2.20.1 Summary of Comments

Comments related to motorist, pedestrian, and bicyclist safety.

2.20.2 Response

The design of the Project incorporates safety features for pedestrians and bicyclists along the alignment, at station locations, at designated crossings, and at parking facilities. The Project will be operated in accordance with Metro system safety plans, policies, and procedures and will provide for the safety of those riding within the light rail vehicles (LRV) and for pedestrians and bicyclists along the guideway and at stations.

As indicated in Chapter 4, Section 4.18.3.2, under the subheading "Motorist, Pedestrian, and Bicyclist Safety" of the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR), the potential for impacts to motorists, pedestrians, and/or bicyclists will be minimized because the Project will follow the Manual on Uniform Traffic Control Devices standards, observe all applicable traffic laws, implement and follow California Public Utilities Commission (CPUC) and local safety requirements, and incorporate design features such as signs and markings, flashing light signals, gates and traffic-control signals, pathway grade crossings, illumination, and safety barriers. There will be no adverse effects related to motorist safety and collisions, and mitigation measures are not required.

The Project will follow Metro's latest Rail Operating Rulebook and CPUC regulations, which allow LRV operators to use audible warning devices to alert pedestrians and bicyclists that an LRV is approaching. Pedestrian and bicycle traffic control and channelization techniques (e.g., crossing gates and right-of-way barriers) will be used to direct pedestrian and bicycle movements at grade crossings and to encourage the use of designated crossings. Signage will be posted at these locations to provide safety information and awareness. The Project will comply with applicable regulations and the Metro Rail Design Criteria or equivalent. In addition, a Preliminary Hazards Assessment and a Threat and Vulnerability Assessment will be prepared as design of the Project advances to verify hazards and features for enhanced pedestrian and bicyclist safety, such as pavement markings and signs. The analysis will verify illumination levels and sight distance improvements, as necessary. Table 4.18.2 in Section 4.18.3.2 of Chapter 4, under the subheading "Motorist, Pedestrian, and Bicyclist Safety" of the Draft EIS/EIR, provides a qualitative evaluation of safety and security conditions for pedestrians and bicyclists along the alignment and at stations. Table 4.18.3 in the same section provides a qualitative assessment of safety and security conditions for pedestrians and bicyclists at each proposed parking facility.

2.21 CR-EJ-1: Environmental Justice Communities

2.21.1 Summary of Comments

Comments regarding the approach and guidance used for the Environmental Justice (EJ) analysis and the identification of EJ communities.

2.21.2 Response

The EJ analysis follows Federal Transit Administration (FTA) Circular 4703.1, U.S. Department of Transportation (USDOT) Order 5610.2C, and the Council on Environmental Quality (CEQ) Environmental Justice Guidance under the National Environmental Policy Act (NEPA) when considering an EJ community and the analysis approach. USDOT Order 5610.2C and subsequent guidance was used to define minority populations and low-income populations. Based on USDOT Order 5610.2C, FTA Circular 4703.1, and subsequent guidance, it was determined that each community along the project corridor meets the criteria to be considered an EJ community.

As stated in Chapter 4, Section 4.22.1.2 of the Draft Environmental Impact Statement/ Environmental Impact Report (EIS/EIR), for purposes of the EJ analysis, the EJ Affected Area is defined as the U.S. Census block groups that are located within or intersect the area within 0.25 mile of the alignments, parking facilities, and maintenance and storage facility site options, and within 0.5 mile of stations. As described in Chapter 4, Section 4.22.3.2 of the Draft EIS/EIR and in greater detail in Section 5.2 of the *West Santa Ana Branch Transit Corridor Project Final Environmental Justice Impact Analysis Report* (Appendix FF of the Draft EIS/EIR), the EJ analysis recognizes that all of the affected jurisdictions are considered EJ communities with EJ populations, and the EJ Affected Area encompasses predominately EJ communities. Non-EJ communities were not identified within the project corridor and EJ Affected Area.

To avoid an oversimplification that adverse effects will occur throughout the EJ communities equally and adverse effects will not be disproportionately high and adverse, the EJ analysis took an extra step to evaluate if EJ communities with a higher EJ population compared to a less dense EJ population will be disproportionately affected. This was done by evaluating EJ

population distribution within the EJ Affected Area and determining which communities had high concentrations of EJ populations with comparable low concentrations. The EJ analysis also considered the location and distribution of adverse effects through the project corridor.

The analysis also compared the Project to similar Metro light rail transit projects in Los Angeles County, involving both EJ communities and non-EJ communities. The review concluded that both community types received comparable attention regarding adverse effects and mitigation. The review confirmed that the Project will address and mitigate adverse effects in a similar manner as other similar Metro light rail projects in both EJ and non-EJ communities. Design of the alignment and stations will be consistent with Metro Rail Design Criteria and Metro's Systemwide Design Standards which are uniformly applied across all Metro lines.

With this approach, it is not necessary to identify the entire corridor as an "EJ corridor" as adverse effects were adequately analyzed to show that a disproportionately high and adverse effect on EJ communities will not occur. Identifying an EJ corridor does not follow FTA Circular 4703.1, USDOT Order 5610.2C, and the CEQ Environmental Justice Guidance under NEPA.

2.22 CR-EJ-2: Little Tokyo

2.22.1 Summary of Comments

Comments requesting the identification of Little Tokyo as an Environmental Justice community.

2.22.2 Response

The City of Los Angeles maintains 35 Community Plans, one for each of its Community Plan Areas. Within the Community Plan Areas are several smaller neighborhoods totaling over 100 recognized City of Los Angeles neighborhoods. The Central City Community Plan Area is composed of nine districts/neighborhoods: Civic Center, Bunker Hill, Financial Core, Convention Center/Arena, South Park, Center City/Historic Core, Little Tokyo, Central City East, and South Market. The Little Tokyo community is listed in the detailed description of the Central City Community in Chapter 4, Section 4.1.2 of the West *Santa Ana Branch Transit Corridor Project Final Communities and Neighborhoods Impact Analysis Report* (Appendix G to the Draft Environmental Impact Statement/Environmental Impact Report [EIS/EIR]). As discussed in Chapter 4, Section 4.22.2.1 of the Draft EIS/EIR, the Central City Community is identified as an Environmental Justice community, which includes the Little Tokyo community. The Locally Preferred Alternative's northern terminus will be at the Slauson/A Line Station, which is located approximately 4 miles south of Little Tokyo.

2.23 CR-FIN-1: Funding

2.23.1 Summary of Comments

Comments regarding the Measure M Ordinance 3 percent match.

2.23.2 Response

The Measure M Ordinance requires local jurisdictions to contribute 3 percent of the cost of major rail transit capital projects. Metro's implementation of this requirement is guided by the Ordinance, Board-approved Measure M Guidelines, and Administrative Procedures. The

3 percent local contribution is separate from the National Environmental Policy Act/California Environmental Quality Act process, and Metro is working with all jurisdictions along the project corridor to come to an agreement on how the contribution will be met. Metro has discussed the 3 percent match with various cities during meetings held throughout 2022. In August 2022 and September 2023, the Metro Board approved the release of revised Measure M 3 percent Local Contribution Guidelines. The revisions changed the method of allocating the 3 percent cost among cities. Previously, the allocation was based on the number of stations within a city, using a 0.5-mile distance around each station. With the revisions, the allocation will be based on the number of centerline track miles within a jurisdiction, limiting the contribution to the area immediately surrounding the light rail transit tracks. The revisions do not otherwise exempt any jurisdictions from the requirement (e.g., those with Equity Focus Communities are not exempt), nor do they provide for payment timeframe extensions that are guided by Metro's administrative procedures.

In February 2023, Metro staff presented further revision that the substantive changes resulting from this action, including expanding credit for first/last mile improvements and excluding first/last mile costs from the "total project cost." These changes will result in a financial benefit and increased flexibility for jurisdictions with a 3 percent contribution, including some with Equity Focus Communities. The remainder of the revisions to the Guidelines clarify existing practices and enhance consistency of current policy with the Measure M Ordinance and, therefore, have no impact on equity opportunities.

The 3 percent local contribution is one of the financial resources supporting Metro's major rail transit projects program in the Measure M Expenditure Plan. The funding sources available to jurisdictions to satisfy the contribution are detailed in Metro's Measure M Guidelines. Metro is also looking at funding opportunities from state funding sources. The 3 percent contribution will be based on 30 percent design, which will include escalation in cost from the current estimate, which is based on approximately 15 percent design. Metro staff will also work with cities on first/last mile improvements that may count toward the contribution.

3 COMMENTS AND RESPONSES

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- U.S. Department of the Interior - FA-1
- U.S. Environmental Protection Agency - FA-2

State Agencies

- California Department of Transportation - SA-3
- California Highway Patrol - SA-1
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- Gateway Cities Council of Government - RA-2
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- Los Angeles County CEO's Office - RA-12
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- Eco-Rapid Transit - JPA-1
- Eco-Rapid Transit Joint Powers Authority, Downtown Industrial District Business Improvement District - JPA-2

- Eco-Rapid Transit, Downtown Industrial District Business Improvement District, & Arts District LA - JPA-3
- Little Tokyo Business Association - ID-3
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FEDERAL AGENCIES

US Army Corps of Engineers

From: Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>
Sent: Wednesday, October 6, 2021 5:55 PM
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Subject: West Santa Ana Branch Extension Project - DEIS Comments (SPL-2021-00450)

Meghna/Charlene,
Please see the attached comment letter on the West Santa Ana Branch Extension Project Draft EIS. Please reference Corps File No. SPL-2021-00450 in future correspondence for this project.

FA-3-1

Thanks,
Veronica Li
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DEPARTMENT OF THE ARMY
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October 6, 2021

SUBJECT: USACE Request to be Cooperating Agency and Comments on DEIR/S for West Santa Ana Branch Transit Corridor Project.

Charlene Lee Lorenzo, Director
Federal Transit Administration, Region 9, Los Angeles Office
888 South Figueroa Suite 440
Los Angeles, California 90017-5467

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

Dear Ms. Lorenzo and Ms. Khanna:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) for the West Santa Ana Branch Transit Corridor Project. Our comments represent the Los Angeles District of the U.S. Army Corps of Engineers ("Corps") Regulatory and Engineering Divisions' interests in the project pursuant to our regulatory authorities promulgated under Section 404 of the Clean Water Act (33 U.S.C. 1344; hereafter, Section 404) and Section 14 of the Rivers and Harbors Act (33 U.S.C. 408; hereafter, Section 408) and considering our National Environmental Policy Act (NEPA) responsibilities. FA-3-2

Build Alternatives 1-3 involve the alteration of and discharge of fill material into three (3) federal flood control projects (federal project) containing waters of the U.S., specifically the Los Angeles River, Rio Hondo, and San Gabriel River. Build Alternative 4 involves the alteration of and a discharge of fill material into one (1) federal project containing waters of the U.S., specifically the San Gabriel River. As such, all the build alternatives would require authorization from the Corps under Section 404 and Section 408.

Based on the Draft EIS/EIR documentation, the Corps' Engineering Division believes that their action to authorize any of the proposed crossings under Section 408 may require the Corps to conduct at least an Environmental Assessment to fulfill their requirements under NEPA. As stated on page S-78 of the Draft EIS/EIR, the Federal Transit Administration (FTA) published the Notice of Intent pursuant to NEPA in the *Federal Register* on July 26, 2017. Under this version of the NEPA Regulations and the FA-3-3

version in the *Federal Register* as of the date of this letter, Federal agencies which have jurisdiction by law can be cooperating agencies in the preparation of an EIS.

By this letter, the Corps hereby requests to be a cooperating agency under 40 CFR Part 1501 and agrees to assist the FTA with preparing the final EIS/EIR due to our jurisdiction by law for areas that could be affected by the project and our special expertise in the following areas:

- Corps' Regulatory Program regulations at 33 CFR parts 320-332;
- Flood control; and
- Assessing the functions and services of aquatic resources and identifying appropriate methods to conduct such assessments.

FA-3-3

Subject to availability of resources and in accordance with applicable laws and regulations, the Corps agrees to:

1. Assist in reviewing information and environmental analysis concerning which the Corps has special expertise.
2. Identify issues, concerns, and any technical studies that the Final EIS should address, including risk assessments for completed federal projects, to support the Corps in fulfilling its NEPA and other legal responsibilities.
3. Review the administrative final EIS/EIR. We request that FTA allow the Corps at least 30 days to review such documents.
4. Cooperate in the application of principles for integration of NEPA, the Section 404 Clean Water Act review process, the Public Interest Review process pursuant to 33 CFR 320.4, and the Section 408 review process pursuant to Engineering Circular 1165-2-220 Item 12.

FA-3-4

The Corps will be required to comply with Section 106 of the National Historic Preservation Act of 1966 (NHPA; herein "Section 106") and Section 7 of the Endangered Species Act (ESA; herein "Section 7") for the federal actions under evaluation. It is appropriate for the FTA as the lead federal agency under NEPA to be the lead federal agency for purposes of compliance with Section 106 and Section 7. Pursuant to 50 C.F.R. § 402 and 36 C.F.R. § 800.2(a)(2), we request the FTA to ensure that the effects of the proposed activities subject to our statutory authorities are fully considered in the consultations with the U.S. Fish and Wildlife Service (USFWS), State Historic Preservation Officer (SHPO) and/or the Advisory Council on Historic Preservation, as applicable. In the event the FTA makes an effect determination or completes Section 7 of the ESA or Section 106 of the NHPA consultations absent coordination with the Corps, our agency must still demonstrate it is in compliance with the ESA and/or NHPA for our discretionary federal actions. The resource agencies with whom you consult and seek concurrence on your analysis of effects related to federally listed species and/or historic properties should be informed that the FTA's consultations

FA-3-5

FA-3-6

are inclusive of the Corps' federal actions/undertakings and are being carried out by the FTA on our behalf. I also request that we be given the opportunity to review pertinent biological and cultural resources documents, including draft biological opinions and draft MOAs. The Corps must be provided with a copy of the documentation demonstrating the FTA has complied with applicable requirements set forth in Section 7 of the ESA and Section 106 of the NHPA for the proposed project before we are able to render final Department of the Army (DA) permit decisions. When applications are submitted to the Corps for authorization under Section 404 and Section 408, please provide information documenting compliance with Section 106 and Section 7, which clearly describes the Area of Potential Effect and effects of the undertaking under Section 106 and the Action Area and effects of the activity under Section 7, such that the Corps can positively determine that the Section 106 and Section 7 compliance covers the Corps' action to authorize the regulated activities. FA-3-6 FA-3-7

Comment 1. Chapter 2, Section 2.5.2 Build Alternatives (Page 2-16): If the existing piers and embankment walls are to be replaced, then the Corps would like to have as few piers in the channel as possible and the abutment placement pushed out to the land side of the levee systems LAR-CC2 and LAR RH2. The addition of new piers makes it harder for the Corps to keep the channel clear of debris and flowing as designed. FA-3-8

In addition, the SPL-HH policy for debris titled "Debris Loading on Bridges and Culverts" need to be satisfied wherever it is applied. FA-3-9

Comment 2. In Chapter 2 Alternatives Considered/Project Description, Table 2.8 Permits and Approvals (Page 2-54): The Corps' regulatory authority is identified as Section 404 and Section 408. This is confusing, because it obscures the fact that they are two very different pieces of legislation with different purposes. These short-hand names for the legislations should either be defined earlier in the document or within the table itself using the following example: "Section 404 of the Clean Water Act (33 U.S.C. 1344, hereafter Section 404)" and "Section 14 of the Rivers and Harbors Act (33 U.S.C. 408, hereafter Section 408)". In addition, remove reference to "Section 10 Bridge Permit". Section 10 of the Rivers and Harbors Act pertains to navigable waters of the U.S. While the Los Angeles River is a Traditionally Navigable Waterway for the purposes of Section 404, these reaches have not been evaluated for navigability under Section 10 of the Rivers and Harbors Act and are not subject to the ebb and flood of the tides. FA-3-10 FA-3-11

Comment 3. In Chapter 2 Alternatives Considered/Project Description, Table 2.8 Permits and Approvals (Page 2-55): Under Regional Jurisdiction, please replace "Regional Water Quality Control Boards" with "Los Angeles Regional Water Quality Control Board" and add "Clean Water Act," before "Section 401". FA-3-12

Comment 4. Chapter 4 Affected Environment and Environmental Consequences (Starting on Page 4-1): For the Corps to be able to demonstrate that this EIS adequately covers the Corps' action (i.e., authorization of the river crossings under Section 404 and Section 408), the effects of the Section 408 components of this project (i.e., the river crossings) need to be identified as a Section 408 action and explicitly named, described, and evaluated for each element of the affected environment considered. Therefore, for each element considered (i.e., Land Use, Communities and Neighborhoods, etc.) the description of the Affected Environment must include a description of what is affected by the Section 408 action (i.e., each river crossing) and the analysis of the Effects of the Action must include an analysis of the effects due to the Section 408 action (i.e., each river crossing). FA-3-13

This is necessary to ensure that the Corps can base our Record of Decision for the Section 408 action on FTA's final EIS.

Comment 5. In Chapter 4 Affected Environment and Environmental Consequences, Table 4.0.1 Geographic Extent of Evaluation (Page 4-2, 4-3): The geographic extent for Noise and Vibration is defined as "Immediate vicinity". This is not a clear extent and is inconsistent with the 500-foot buffer evaluated in the discussion of Construction Impacts (Page 4-626). Recommend replacing with "500-feet". Finally, regarding the geographic extent for Archaeological Resources, the direct APE should include a direct reference to the bridge footings within the flood control channel. For example: "The direct APE encompasses the alignment ROWs, as well as all associated elements where construction would occur, including stations, laydown yards, maintenance facilities, parking lots, and bridge footings within flood control channels and waters of the U.S. … Where the Project is aerial, including where it bridges over flood control channels and waters of the U.S., the direct APE encompasses the width of the proposed ROW. In areas with potential direct ground disturbance, including at bridge footings in flood control channels and waters of the U.S., the vertical extent of the direct APE extends approximately…" FA-3-14 FA-3-15

Comment 6. In Chapter 4, Section 4.8.1.1 Ecosystems/Biological Resources, Regulatory Setting and Methodology, Regulatory Setting (Page 4-320): Add "The Fish and Wildlife Act of 1956" to the list of authorities attributed to the U.S. Fish and Wildlife Service. The Fish and Wildlife Coordination Act (15 U.S.C. 742a, *et seq.*) requires that any federal agency that proposes to control or modify any body of water must first consult with US Fish and Wildlife Service or the National Marine Fisheries Service, as appropriate, with a view to the conservation of wildlife resources. FA-3-16

Comment 7. In Chapter 4, Section 4.8.2.2 Ecosystems/Biological Resources, Affected Environment/Existing Conditions, Special-Status Biological Resources, FA-3-17

Jurisdictional Waters (Page 4-327): Please change this header to "Wetlands and Other Waters of the U.S." FA-3-17

Comment 8. In Chapter 4, Section 4.8 Ecosystems/Biological Resources (Page 4-328): Remove reference to Section 10 of Rivers and Harbors Act. While the Los Angeles River is a Traditionally Navigable Waterway for the purposes of Section 404 of the Clean Water Act, these reaches have not been evaluated for navigability under Section 10 and are not subject to the ebb and flood of the tides. FA-3-18

Comment 9. In Chapter 4, Section 4.8 Ecosystems/Biological Resources (Page 4-333): This section describes the environmental consequences of the operation of the LRT on jurisdictional waters, not the construction. Please clarify this in the discussion. For example: "The LRT would span over these resources and therefore it's operation would not disturb…" FA-3-19

Comment 10. In Chapter 4, Section 4.10.4 Hazards and Hazardous Materials Project Measures and Mitigation Measures (Page 4-405): Mitigation Measure HAZ PM-2 Disposal of Groundwater (Operation) indicates the possibility of dewatering contaminated groundwater during operations. Under certain circumstances, such as when there is measurable sediment in that water, this could trigger a Clean Water Act section 404 permit. This possibility should be mentioned, and the Corps listed as one of the agencies that would be notified. FA-3-20

Comment 11. In Chapter 4, Section 4.11.1.1 Water Resources, Regulatory Setting, Federal, Clean Water Act (Page 4-415): Please strike "navigable waters and traditionally navigable" from the first sentence, so that it reads "The USACE has jurisdiction over waters of the U.S., which are defined in Title 33, Part 328.3 of the Code of Federal Regulations." We recommend removing all capitalizations of *waters* of the U.S. to be consistent with the referenced code. Please add a sentence stating that temporary (such as water diversion barriers) or permanent (such as bridge supports) discharges of dredged or fill material into the Los Angeles River, Rio Hondo, and San Gabriel River would require authorization from the Corps under Section 404 of the Clean Water Act. Finally, this is the appropriate place to discuss Section 401 and Section 402 of the Clean Water Act, currently discussed under State Regulations. These are federal regulations, even though the State implements them. FA-3-21 FA-3-22 FA-3-23

Comment 12. In Chapter 4, Section 4.11.1.1 Water Resources, Regulatory Setting, Rivers and Harbors Act of 1899 (Page 4-415): Please add "as amended" after 1899 and strike 403 from "(33 U.S.C. 403 and 408)", so that it reads "Rivers and Harbors Act of 1899, as amended (33 U.S.C. 408)." Refer to Comment 2 above. FA-3-24

Comment 13. In Chapter 4, Section 4.11.3 Environmental Consequences/ Environmental Impacts on Water Resources: The Draft EIS does not evaluate the environmental consequences of the proposed river crossings on the hydrology within the channels. This evaluation is critical for informing a decision to authorize the crossings or not under Section 408. Furthermore, Appendices A, B, and C to Appendix T to the DEIS mentions that the water surface elevation is dropped due to the proposed project and that the change was due to having a supercritical flow condition at these locations. The Corps will need to review in detail the hydraulic analysis and the hydraulic models used in the analysis before making a determination regarding the significance of these impacts. This section, along with Appendix T and its Appendices A, B, and C should be updated accordingly, as necessary. FA-3-25

In addition, the appropriate Manning's roughness coefficient should be used in the model geometry. For example, using 0.013 for San Gabriel River is not appropriate unless there is a specific reason. FA-3-26

Comment 14. Chapter 4, Section 4.14.2.1 Built Environment Historic Properties and Historical Resources (starting on Page 4-485): The Los Angeles River channel (as-builts dated 1950, last modified in 1952), Rio Hondo channel (as-builts dated 1950, last modified in 1952), and San Gabriel River channel (possibly constructed in 1964) are considered elements of the built environment. It does not appear that these were evaluated for eligibility to be listed in the National Register of Historical Places. These channels should be described and evaluated for eligibility in the Cultural Resources Survey Report (Appendix W) and the Cultural Resources Effects Report (Appendix X) pursuant to 36 CFR 60.4. If any of these channels are determined to be eligible, the effects should be described in the Cultural Resources Effects Report as well as in Section 4.14 of the Draft EIS. FA-3-27

If the Union Pacific Railroad (Map Reference No. 17-006, Page 4-490) was previously determined eligible, the date of determination, date of SHPO concurrence letter, and relevant SHPO concurrence letter should be included in the Cultural Resources Survey Report (Appendix W, Page 7-78) and Cultural Resources Effects Report (Appendix X, Page 5-161). If the resource has been recommended, but not determined eligible with SHPO concurrence, the cited evaluation should be reviewed, an eligibility determination made, and the reasoning conveyed in the Cultural Resources Survey Report (Appendix W, Page 7-78) and Cultural Resources Effects Report (Appendix X, Page 5-161). FA-3-28

Finally, the date of SHPO concurrence and the relevant SHPO letter for P-19-192309, the SCE's Long Beach-Laguna Bell 66kV and 220 kV Transmission lines (Map Reference No. 18-016) should be included in the Cultural Resources Survey Report (Appendix W, Page 7-72) and Cultural Resources Effects Report (Appendix X, Page 5-142). FA-3-29

Comment 15. In Chapter 4, Section 4.14.1.2 Historic, Archaeological, and Paleontological Resources; Methodology (Page 4-470): It would be helpful to the reader FA-3-30

to restate the depths of the APE from the table on page 4-3. Also, please include statement of the vertical APE at the water crossings. FA-3-30

Comment 16. In Chapter 4, Section 4.15.1.2 Tribal Cultural Resources, Methodology (Page 4-515): In the last sentence of the first paragraph under the heading "Native American Heritage Commission Sacred Lands File Search", please insert "(Appendix Z)" after "prepared for this Project", so that it reads "Responses received from the NAHC are included in Appendix A of the Traditional Cultural Properties and Tribal Cultural Resources Impact Analysis Report prepared for the Project (Appendix Z)". FA-3-31

Comment 17. Chapter 4, Section 4.18 Safety and Security (Page 4-571): The extension of existing abutments and new bridge beams have the potential to create new areas for individuals experiencing homelessness to occupy. This potential adverse effect on safety and security should be discussed in this section. If individuals were to occupy the abutments or under the bridge beams, they create a safety and security risk to regular maintenance of the flood control system, to themselves during rain events, and to the emergency personnel sent to rescue them. However, these adverse effects can be minimized by designing restrictive access to the abutments and areas under the bridge, designing the abutments in such a way as to prevent loitering or occupation, and relocating or preventing trespassers on a regular basis and at the request of the Corps. FA-3-32

Comment 18. Chapter 4, Section 4.19 Construction Impacts (Page 4-603): Construction related impacts on the operation and maintenance of the Los Angeles River are not assessed but should be. Potential adverse effects include localized flooding and decreased flood protection upstream. The potential adverse effects can be minimized by maintaining an open path through the construction site for the Corps' maintenance equipment at all times during construction, timing construction to occur in the dry season and in dry weather, and by complying with conditions attached to the Section 408 authorization. FA-3-33

We look forward to continued dialogue and coordination with the FTA and the Los Angeles County Transportation Authority on this project. If you have any Regulatory-related questions, please contact Lia Protopapadakis at (213) 452-3372 or via email at Lia.Protopapadakis@usace.army.mil; and for any Section 408-related questions, please contact Rafi Talukder at (213) 452-3745 or via email at Rafiqul.I.Talukder@usace.army.mil. Please refer to this letter and the Corps' Regulatory File Number SPL-2021-00450-LPF in your reply.

Sincerely,

TALUKDER.RAFIQUL.I.1391001010

Digitally signed by TALUKDER.RAFIQUL.I.1391001010
Date: 2021.10.06 16:47:40 -07'00'

Rafi Talukder, P.E.
Chief, Facility Support and Permits Section
408 Permit Coordinator
Engineering Division

US Army Corps of Engineers – FA-3

Comment ID	Response
FA-3-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
FA-3-2	Regarding the United States Army Corps of Engineers (Corps) jurisdiction over waters of the United States, clarification that the Project will require authorization from the Corps per Section 404 permit has been added under Chapter 4, Section 4.11.1.1 of the Final EIS/EIR, under the subheading "Federal." Discussion was added regarding the alteration and discharge of fill material into the Los Angeles River, Rio Hondo Channel, and San Gabriel River, and general project impacts within the Corps' channels in Chapter 4, Section 4.11.3.6 and Section 4.19.3.11 under the subheading "U.S. Army Corps of Engineers Facilities" of the Final EIS/EIR. Also, discussion of project impacts on the Corps facilities was added in Section 5.6 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report* (previously Appendix T of the Draft EIS/EIR). Discussion of project impacts at river crossings was previously included in Chapter 4, Section 4.11.3.3 of the Draft EIS/EIR, under the subheading "Floodplains." As stated in this section, the Project would cross three flood control channels, with new permanent structures located within each channel. As stated in Chapter 4, Section 4.19.3.11 of the Draft EIS/EIR, under the subheading "Floodplains," construction activities would also result in dredged and fill materials being placed within the channels. The Final EIS/EIR includes a focused discussion on effects to Corps' facilities in Chapter 4, Section 4.11.3.6. The discussion of Corps authorization per Section 408 permit is included in Chapter 4, Section 4.11.1.1 of the Draft EIS/EIR, under the subheading "Federal." Section 404 and 408 permit requirements are also discussed in Section 3.1 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report.*
FA-3-3	The request by the Corps to serve as a cooperating agency has been noted in Chapter 7, Sections 7.2.2 and 7.8.1 of the Final EIS/EIR. The Federal Transit Administration (FTA) acknowledged the Corps as a cooperating agency in a letter dated October 31, 2021. This correspondence is included in Appendix G of the Final EIS/EIR.
FA-3-4	Metro and FTA coordinated with the Corps during preparation of the Final EIS/EIR. Coordination included providing draft documents, including sections and technical reports, to the Corps for review. Comments from the Corps were addressed accordingly and are reflected in the Final EIS/EIR. Review durations were coordinated with the Corps. Metro and FTA will continue to coordinate with the Corps in support of the Section 404 and Section 408 permits and review processes.

Comment ID	Response
FA-3-5	FTA and Metro have coordinated with the Corps for the review of information and environmental analysis in the areas where the Corps has special expertise. Additionally, Metro and FTA coordinated with the Corps in support of Section 106 and consulted with the State Historic Preservation Officer (SHPO). As discussed in Chapter 7, Section 7.5.1 of the Draft EIS/EIR, on September 12, 2018, a meeting was held with the U.S. Fish and Wildlife Service (USFWS) to evaluate the Special Status Species list. The USFWS agreed with the findings in the species list and did not express concerns with the project alignment; therefore, additional Section 7 consultation is not necessary.
FA-3-6	As discussed in Chapter 7, Section 7.5.1 of the Draft EIS/EIR, on September 12, 2018, a meeting was held with the USFWS to evaluate the Special Status Species list. The USFWS agreed with the findings in the species list and did not express concerns with the project alignment; therefore, additional Section 7 consultation is not necessary. In support of Section 106 consultation, FTA and Metro informed the SHPO that the FTA's consultations are inclusive of the Corps' federal actions/undertakings and are being carried out by the FTA on behalf of the Corps. This information was included in letters and reports submitted to SHPO for review. Correspondence with SHPO is included in Appendix J of the *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report—Rev 2*, Appendix B of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report*, and Appendix G of the Final EIS/EIR.
FA-3-7	In recognition of the Corps' cooperating agency status, Metro provided the Corps with copies of documents developed to support Section 106 and Section 7 compliance. Metro also will provide the Corps with documentation of Section 7 ESA and Section 106 NHPA compliance as part of permit applications.
FA-3-8	No existing piers or embankment walls will be replaced. Text has been added to Chapter 4, Section 4.11.3.3 of the Final EIS/EIR and to Section 5.3.3 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report.* The addition of new piers is discussed in Chapter 4, Section 4.11.3.1 of the Draft EIS/EIR. The new piers will be oriented parallel with the direction of flow within the channel to minimize impacts and maintain design flows. Detailed hydraulic analysis for each river crossing is provided as appendices to the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report.* This analysis is based on the present conceptual design of the alternatives. As the final design progresses, if the existing piers and embankment walls are to be replaced, Metro will consider these recommendations and incorporate these where feasible.
FA-3-9	Hydraulic analysis is presented as appendices to the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report*. As stated in Section 6 of each of these appendices, the basis of the river analysis is the existing Corps Hydrologic Engineering Center's River Analysis System (HEC-RAS) model (version 4.1.0), which is a one-dimensional hydraulic model provided by the Corps in 2017. Each model was adopted without modifications for the purpose of the study. With regard to the application of debris factors, these models are not in compliance with the Corps Los Angeles District Hydrology & Hydraulics (SPL-HH) policy. Metro will incorporate the Corps SPL-HH policy titled "Debris Loading on Bridges and Culverts" into future hydraulic analysis performed as the design progresses.
FA-3-10	The suggested revisions have been incorporated in Table 2.11 of the Final EIS/EIR.
FA-3-11	The suggested revision has been incorporated in Table 2.11 of the Final EIS/EIR.

Comment ID	Response
FA-3-12	The suggested revisions have been incorporated in Table 2.11 of the Final EIS/EIR.
FA-3-13	The Final EIS/EIR has been revised to identify the Section 408 action and relevant project effects. A subsection has been added in Chapters 3 and 4 for each topic to summarize the evaluation of effects to Corps' facilities.
FA-3-14	Table 4.0.1 in Chapter 4 of the Final EIS/EIR has been updated to note that the extent of analysis for operational impacts is 350 feet per the FTA screening distance and 500 feet for construction.
FA-3-15	The Area of Potential Effect (APE) delineation included in Section 4.1 of the *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report—Rev 2* (circulated as the Final Cultural Resources Survey Report–Rev 1, Appendix W of the Draft EIS/EIR) has been updated to include a direct reference to the bridge footings within the flood control channel.
FA-3-16	Chapter 4, Section 4.8.1.1 of the Final EIS/EIR has been revised to add "Fish and Wildlife Act of 1956" to the list of authorities attributed to the USFWS.
FA-3-17	The header "Jurisdictional Waters" is a term that includes wetlands and other waters of the U.S. but also encompasses wetland and other waters of the state regulated by the Regional Water Quality Control Board in addition to streambeds regulated by the California Department of Fish and Wildlife. Therefore, the header has not been updated in Chapter 4, Section 4.8.2.2 of the Final EIS/EIR in order to continue to include the other waters of the state and streambeds.
FA-3-18	The reference to Section 10 of the Rivers and Harbors Act has been removed from Section 4.8.2.2 of the Final EIS/EIR and Section 4.1.3.3 of the *West Santa Ana Branch Transit Corridor Project Final Biological Resources Impact Analysis Report* (previously Appendix N of the Draft EIS/EIR). The reference has also been removed from Table 2.11 in Chapter 2 of the Final EIS/EIR.
FA-3-19	As noted in Section 4.8.3.2 in Chapter 4 of the Draft EIS/EIR, the analysis conclusions for the Build Alternatives are specific to operation of the Project. As stated in the introduction to Chapter 4 of the Draft EIS/EIR, effects during construction are discussed in Section 4.19, Construction Impacts, for each element of the environment. Construction impacts to jurisdictional waters are addressed in Chapter 4, Section 4.19.3.8 of the Draft EIS/EIR.
FA-3-20	If dewatering of contaminated groundwater is necessary, groundwater will be properly managed onsite prior to disposal or recycling of contaminated groundwater offsite at appropriate waste management facilities. As Section 4.10.4.1 indicates, compliance with Los Angeles Regional Water Quality Control Board requirements (including National Pollutant Discharge Elimination System [NPDES] permits and Waste Discharge Requirements) governing groundwater discharges will be mandatory prior to discharging dewatered groundwater during operations, if required. Compliance will minimize discharge of contaminants and sediment. Furthermore, dewatered groundwater will not be discharged directly to Corps facilities. Therefore, a Clean Water Act Section 404 permit is not anticipated to be required for disposal of contaminated groundwater. As stated in Project Measures HAZ PM-2 (Disposal of Groundwater-Operation) (Chapter 4, Section 4.10.4.1 of the Draft EIS/EIR) and HAZ PM-7 (Disposal of Groundwater) (Chapter 4, Section 4.19.3.10 of the Draft EIS/EIR), various agencies will be notified, and discharge and disposal requirements will be developed in consultation with the agencies and project proponent.
FA-3-21	Chapter 4, Section 4.11.1.1 of the Final EIS/EIR was updated based on coordination with the Corps.

Comment ID	Response
FA-3-22	The recommended capitalization change to waters of the U.S. has been incorporated throughout the Final EIS/EIR and the technical reports. Chapter 4, Section 4.11.1.1 of the Final EIS/EIR was updated based on coordination with the Corps.
FA-3-23	The discussion of Section 401 and Section 402 has been moved from the subheading "State Regulations" to "Federal Regulations" in Chapter 4, Section 4.11.1.1 of the Final EIS/EIR.
FA-3-24	The change was incorporated into Chapter 4, Section 4.11.1.1 of the Final EIS/EIR and Section 3.1.2 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report*.
FA-3-25	Hydraulic analysis and potential flooding impacts are discussed in Chapter 4, Sections 4.11.3.3 and 4.19.3.11, Water Resources, of the Draft EIS/EIR. Section 4.11.3.3 under the subheading "Floodplains" identifies the three major flood-control channels that would be crossed and how the project design features would avoid encroachment of the existing rivers and floodplains. Reference to the location hydraulic studies of each crossing is mentioned, along with the impact to water surface elevations. Chapter 4, Section 4.19.3.11 of the Draft EIS/EIR, under the subheading "Floodplains" identifies the three rivers where construction would be required for the new bridge piers. Discussion of construction impacts to the ordinary high-water mark, banks, and levees under the Corps' jurisdiction is included. Also included is a discussion of construction activity compliance with all federal and local regulations to minimize construction impacts. Appendices to the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report* also provide detailed location hydraulic study results. During the design phase, detailed analysis will be performed to evaluate the potential for hydraulic impacts within the channel and will be submitted to the Corps for review as part of the Section 408 Permit submittal.
FA-3-26	The hydraulic analysis presented is based on a base line model provided by the Los Angeles County Flood Control District at the start of the analysis (2017). As the baseline model was presumed to be approved for use by the agencies, a re-assessment of the existing roughness coefficients was deemed unnecessary. Project conditions models were developed by implementing relevant changes to the baseline model. However, in general, as the Project would affect small portions of the channel lining, with the invert paving to be replaced in-kind, no changes to roughness parameters were expected to be required. These parameters will also be evaluated in support of the Project's future Section 408 Permit submittal.
FA-3-27	The portions of the Los Angeles River channel, Rio Hondo Channel, and San Gabriel River channel in the APE have been evaluated for eligibility, as documented in Section 7.2.2 of the *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report—Rev 2*. The portions of all three river channels in the APE have been assumed eligible for listing in the National Register of Historic Places (NRHP) for the purposes of the Project. SHPO concurred with this eligibility assessment in a letter dated June 29, 2023. Accordingly, potential effects to these river channels are also described in Section 5.2 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* (circulated as the Revised Preliminary Cultural Resources Effects Report, Appendix X of the Draft EIS/EIR), as well as in Sections 4.14 and 4.19 of the Final EIS/EIR. SHPO concurred with the effects assessment in a letter dated March 12, 2024.

Comment ID	Response
FA-3-28	Map Reference No. (MRN) 17-006 refers to the Union Pacific Railroad Bridge, not the Union Pacific Railroad. MRN 17-006 has not been subject to survey and evaluation efforts prior to the West Santa Ana Branch Project. As summarized in Section 7.2.2 of the *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report—Rev 1* in support of the Project, Secretary of Interior-qualified architectural historians evaluated the bridge and recommended it eligible for listing in the NRHP and the California Register of Historical Places under Criteria C/3 as an excellent and rare example of a subdivided Warren truss steel bridge. It additionally is recommended eligible for local designation under South Gate Criteria E as a distinguished engineered structure. This determination of eligibility was included in the Cultural Resources Survey Report, which was sent to the SHPO for concurrence in March 2020. No comments were received from SHPO on the determinations of eligibility included in the Cultural Resources Survey Report. The resource was also included in the Cultural Resources Survey Report—Rev 2 which was submitted to SHPO for review in May 2023, after circulation of the Draft EIS/EIR. SHPO provided concurrence on the report in a letter dated June 29, 2023.
FA-3-29	A set of California Department of Park and Recreation 523 Series Forms associated with Resource P-19-192309 was obtained via the California Historical Resource Information System search conducted on April 17, 2017, in support of the Project. The forms indicate that the resource has been determined eligible for listing in the NRHP, with the application of a California Historical Resource Status Code '2S2,' indicating that it is an individual property determined eligible for the National Register by a consensus through the Section 106 process and is listed in the California Register. The resource is additionally listed in the California Office of Historic Preservation Built Environment Resources Directory (BERD) for Los Angeles County with a '2S2' status code. The BERD additionally indicates that the resource was evaluated on April 25, 2018, and provides its evaluation identifier as 'COE_2017_1127_002' indicating that its evaluation was completed by the Corps in 2017. This information has been added throughout. However, a corresponding SHPO concurrence letter has not been located.
FA-3-30	A footnote regarding the vertical extent of the APE has been added to the bottom of Figure 4.14-1 (Direct and Architectural APE and Built Environment Results) in Chapter 4, Section 4.14.1.2 of the Final EIS/EIR. Additionally, a statement regarding the vertical APE at water crossings has also been added to the APE delineation included in Section 4.1 of the *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report—Rev 2.*
FA-3-31	The text in Chapter 4, Section 4.15.1.2 in the Final EIS/EIR has been updated to read "Responses received from the NAHC are included in Appendix A of the *West Santa Ana Branch Transit Corridor Project Final Traditional Cultural Properties and Tribal Cultural Resources Impact Analysis Report* prepared for the Project."
FA-3-32	The extension of the abutments and new bridge beams will not create new areas for individuals experiencing homelessness to occupy. The Project's bridges will be designed to incorporate Crime Prevention through Environmental Design (CPTED) strategies. CPTED is a multi-disciplinary approach of crime prevention that uses urban and architectural design and the management of built and natural environments. The design will restrict public access from Metro right-of-way to the Project's bridge beams and abutments, preventing individuals experiencing homelessness from occupying Metro's facilities. The areas under the bridge (in this case the flood control system as cited in the comment) is not the property of Metro, and it is the local jurisdiction's responsibility to prevent public access into the flood control system. Therefore, the analysis presented in Chapter 4, Section 4.18 of the Draft EIS/EIR is sufficient, and the design restricts access to prevent loitering or occupation. No further updates are needed.

Comment ID	Response
FA-3-33	Chapter 4, Section 4.11.3.1 of the Final EIS/EIR has been updated to identify Section 408 compliance as a mandatory requirement. Compliance will occur after the Record of Decision is issued on the Final EIS. Construction-related impacts are discussed in Chapter 4, Section 4.19.3.11 of the Draft EIS/EIR. Section 4.19.3.11 under the subheading "Construction General NPDES Permit Compliance" discusses implementation of a Stormwater Pollution Prevention Plan and lists the strategies to be used during construction to maintain river operation and minimize impacts for in-stream construction activities. Additionally, under the subheading "Floodplains," it discusses the construction-related impacts to the river and that all activities would comply with all federal and local floodplain regulations. Applicable federal regulations are identified in Chapter 4, Section 4.11.1.1 of the Draft EIS/EIR under the subheading "Federal," and include the "Rivers and Harbors Act of 1899." This section also includes a discussion that construction and operation of the Project at the Los Angeles River would require the Corps' review and approval through a Section 408 permit. Section 4.19.3.11 includes a discussion of impacts to Corps facilities. As noted in this section, all work involving storm drains and flood-control channels will occur outside the storm season between October 15 through April 15 and will require review and approval through a Section 408 permit. Construction will conform to the Corps' full channel construction limitations. For example, from April 15 through May 31 and September 1 through October 15, 33.3% of the original channel design capacity will be preserved. From June 1 through August 31, 5% of the original channel design capacity will be preserved. With compliance with floodplain regulations and the project design features, the LPA's potential impacts will be minimized and will not result in adverse effects during construction.

US Department of the Interior

From: Whitlock, Janet L [janet_whitlock@ios.doi.gov]
Sent: 9/23/2021, 4:27 PM
To: wsab@metro.net
Cc: david_louter@nps.gov; roxanne_runkel@nps.gov; doug_wilson@nps.gov; shawn_alam@ios.doi.gov; nicholas_mitrovich@nps.gov; danette_woo@nps.gov
Subject: DOI Comment letter West Santa Ana Branch Transit Project

Please see the attached comment letter on the subject project. FA-1-1

Thank you.

Janet Whitlock

Regional Environmental Officer; CA, NV, AZ and Pacific Islands (Regions 8, 10, and 12)
Office of Environmental Policy and Compliance
US Department of the Interior
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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
2800 Cottage Way, Rm E-1712
Sacramento, California, 95825

In Reply Refer To:
9043.1
21/0304

September 23, 2021

Meghna Khanna
Project Manager
One Gateway Plaza, M/S 99-22-7
Los Angeles, CA 90012
wsab@metro.net

Subject: Draft Environmental Assessment and Draft Section 4(f) Evaluation for the West SantaAna Branch Transit Corridor Project

Dear Project Manager Khanna:

As required under Section 4(f) of the Department of Transportation Act of 1966, the United States Department of the Interior, through the National Park Service, has reviewed a draft Section 4(f) evaluation for the West Santa Ana Branch Transit Corridor project.

In a report dated July 30, 2021, the Federal Transit Administration of the U.S. Department of Transportation and the Los Angeles County Metropolitan Transportation Authority evaluated Section 4(f) properties affected by the West Santa Ana Branch Transit Corridor project in Los Angeles County, California: Los Angeles Union Station; the Barker Brothers Furniture Store; I-105/Century Freeway- Transitway Historic District; 6000 Alameda Stree; 6101 Santa Fe Avenue; Seventh Street Commercial Historic District; Paramount Park; and resources associated with temporary occupancy. They concluded that the project would have a *de minimis* impact or fell under the temporary use exception for these properties. FA-1-2

No Department of the Interior Bureaus have identified any concerns with the 4(f) evaluation and the relevant National Park Service programs indicate no comments either. As such, the Department of the Interior has no comments on this project.

If you have any questions regarding the review by the National Park Service please contact Doug Wilson at doug_wilson@nps.gov. For all other questions, please contact me at janet_whitlock@ios.doi.gov or at 415 420-0524.

Sincerely,

JANET WHITLOCK
Digitally signed by JANET WHITLOCK
Date: 2021.09.23 16:23:38 -07'00'

Janet L. Whitlock
Regional Environmental Officer

cc:
Shawn Alam, DOI
David Louter, NPS
Nick Mitrovich, NPS
Roxanne Runkel, NPS
Doug Wilson, NPS
Danette Woo, NPS

US Department of Interior – FA-1

Comment ID	Response
FA-1-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
FA-1-2	FTA and Metro appreciate the Department of the Interior's review and attention to the Draft Section 4(f) Evaluation for the West Santa Ana Branch Transit Corridor Project. In January 2022, the Metro Board of Directors identified Alternative 3 from the Draft EIS/EIR as the Locally Preferred Alternative (LPA). The Final Section 4(f) Evaluation, which is summarized in Chapter 5 of the Final EIS/EIR, documents the effects analysis for the LPA. The LPA avoids many of the Section 4(f) impacts identified for Alternatives 1 and 2 in the Draft EIS/EIR, including Los Angeles Union Station; the Barker Brothers Furniture Store; and Seventh Street Commercial Historic District. The Section 4(f) impacts under the LPA are generally consistent with those identified for Alternative 3 in the Draft Section 4(f) Evaluation, with findings for additional historic properties evaluated under Section 106 of the National Historic Preservation Act: ▪ De minimis impacts at the Century Freeway-Transitway Historic District, 6000 Alameda Street, 6101 Santa Fe Avenue, Huntington Park High School, Cudahy Substation, LA River Channel, Rio Hondo River Channel, San Gabriel River Channel, and Paramount Park. ▪ Temporary occupancy (no use) at Paramount Park, Los Angeles River Bike Path, Rio Hondo Bike Path, and San Gabriel River Mid-Trail. Metro provided an update on the Section 4(f) analysis and findings to the Department of the Interior in a letter dated September 26, 2023. No response was received from Department of the Interior. Section 5.5 of the Final EIS/EIR and Appendix A to the Final Section 4(f) Evaluation documents concurrence from the California State Historic Preservation Office, City of Paramount, and County of Los Angeles Department of Public Works, as applicable. Should there be a change to impacts or use after the Record of Decision, the Department of the Interior will be provided a copy of the changes.

U.S. Environmental Protection Agency, Region 9

From: Appleton, Zac <Appleton.Zac@epa.gov>
Sent: Tuesday, September 28, 2021 2:47 PM
To: russell.whisman@dot.gov
Cc: Khanna, Meghna <KhannaM@metro.net>
Subject: FTA West Santa Ana Branch DEIS - EPA's Comment Letter

Rusty,

Here is EPA's comment letter for FTA/Metro's West Santa Ana Branch DEIS. Rusty and Meghna, I will share your e-mail addresses with Sharissa Singh, the Remedial Project Manager for the three Superfund sites in South Gate, to facilitate coordination. If you have any questions about EPA's comment letter, please feel free to contact me directly. FA-2-1

Thanks,

Zac Appleton, NEPA Reviewer
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street, TIP-2
San Francisco, CA 94105
Phone: 415-972-3321
Fax: 415-947-8026

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

September 28, 2021

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

Subject: Draft Environmental Impact Statement for the West Santa Ana Branch Transit Corridor Project, Los Angeles, California. (EIS No. 20210103)

Dear Rusty Whisman:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The U.S. Federal Transit Administration and the Los Angeles County Metropolitan Transportation Authority propose to improve the overall mobility and connectivity with reliable transit service for future and current historically underserved and transit-dependent communities by adding a new 20-mile light rail transit line connecting downtown Los Angeles to southeast Los Angeles County. The EPA accepted the invitation from FTA and Metro to become a Participating Agency as defined by 23 USC 139 and provided scoping comments for the preparation of this Draft EIS on August 4, 2017. We appreciate that FTA and Metro addressed many of our scoping comments in the preparation of this combined Draft EIS/Draft EIR. We note FTA and Metro have identified Alternative 3 as the Staff Preferred Alternative, and the Locally Preferred Alternative will be selected by the Metro Board following the circulation and consideration of public comments on this combined Draft EIS/Draft EIR. The attached detailed comments further describe EPA recommendations for the project regarding impacts to air quality, environmental justice, aquatic resources, and Superfund sites. FA-2-2

The EPA appreciates the opportunity to review this Draft EIS. If you have any questions, please contact me at (415) 947-4167, or Zac Appleton, the lead reviewer for this project, at (415) 972-3321. When the Final EIS is prepared and released for public review, please send a digital copy to appleton.zac@epa.gov.

Sincerely,

CONNELL DUNNING Digitally signed by CONNELL DUNNING Date: 2021.09.28 14:22:23 -07'00'

for Jean Prijatel
Manager, Environmental Review Branch

Enclosures: Detailed Comments

cc: Candice Hughes, Federal Transit Administration
Fanny Pan, Los Angeles County Metropolitan Transportation Authority
Lijin Sun, South Coast Air Quality Management District

U.S. EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT, LOS ANGELES, CALIFORNIA, SEPTEMBER 28, 2021

Air Quality

The Environmental Protection Agency notes that the proposed West Santa Ana Branch Transit project is included in the financially-constrained Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy and the analysis prepared for the project supports the conclusion that it will not significantly delay attainment or contribute to a new violation of the National Ambient Air Quality Standards. The air quality analysis indicates that the project is not a Project of Air Quality Concern, will not significantly worsen existing or contribute to localized particulate matter hot-spots, and will reduce emissions associated with vehicle miles traveled. The proposed project therefore satisfies Transportation Conformity requirements under the Clean Air Act Section 176(c) at the regional and project scale. We similarly note that the Draft EIS analysis and supporting technical reports indicate that the project would not significantly contribute to mobile source air toxics emissions. However, we also note that for Build Alternatives 1, 2 and 3 for the proposed project, freight rail tracks may be relocated within the existing right of way, including potentially relocated tracks 15 feet closer to residences along Facade Avenue near Rosecrans Avenue. While analysis was completed for noise and vibration impacts for the residences near this infrequently used track, the EPA recommends that potential exposure to diesel particulate matter from freight rail operations be assessed in the Final EIS. The EPA also recommends that the Draft EIS consider additional measures to reduce haul trucks exceedances of daily NOx emissions limits during the construction phase of the project.

FA-2-3

FA-2-4

***Recommendations*:**

- In the Final EIS, the EPA recommends that the Federal Transit Administration and Metro analyze whether the relocation of the freight tracks within the existing right of way would increase air pollutants to residences and any sensitive receptors adjacent to the rail right of way. Disclose potential emissions increases and identify and commit to mitigation measures or project design features to reduce project impacts to sensitive receptors.
- We recommend the FTA and Metro continue to work closely with the South Coast Air Quality Management District to further reduce emissions and health-related impacts through identification of mitigation measures and project design refinements, including any commitments to reduce construction phase haul truck NOx emissions quantities.

FA-2-5

Environmental Justice

The EPA acknowledges the FTA and Metro's extensive Environmental Justice analysis regarding the environmental effects from all the Build Alternatives, design options, and Maintenance and Storage Facility (MSF) options that would be predominantly borne by multiple communities with environmental justice concerns, including three designated AB 617 communities: 1) East Los Angeles, Boyle Heights, West Commerce, 2) Southeast Los Angeles, and 3) South Los Angeles. The Draft EIS analysis states that with mitigation commitments for traffic circulation, parking, noise and vibration, and bike plan consistency, the communities in the EJ Affected Area would not be disproportionately impacted by the build alternatives, design options, and MSF site options. The Draft EIS also concludes that, when completed, the proposed light rail transit project will address the mobility and access constraints faced by communities in the project area that have environmental justice concerns and are transit-dependent. From a land acquisition perspective, we note that between the two proposed MSF options, the Bellflower site would require the least land acquisition and have 118,300 fewer square feet of affected

FA-2-6

area. According to the Draft EIS, neither MSF site option would require acquisition of residential property, and neither site option would adversely affect community stability.

> ***Recommendations*:** We recommend the FTA and Metro continue to engage the communities in the EJ Affected Area well into construction phase to confirm the project design and mitigation commitments are implemented as intended and result in effective reduction of adverse impacts. In particular, since Randolph Street in Huntington Park will experience adverse traffic effects after mitigation due to the at-grade construction of the project, we recommend that FTA and Metro extend ongoing active engagement to communities along adjacent parallel streets which may experience greater vehicle traffic, such as East Gage and East Slauson Avenues.

FA-2-6

Aquatic Resources

The EPA acknowledges the extensive aquatic resource impact analysis included in the Draft EIS for the project. The Draft EIS concludes that none of the build alternatives, design options, or Maintenance and Storage Facility sites would result in adverse effects to hydrology, surface water bodies, water quality, floodplains, or groundwater, and therefore mitigation would not be required. The Draft EIS also states that all rail operations, stations, parking facilities, local street improvements and Traction Power Substations would not adversely affect water quality. The EPA appreciates the commitments to Low Impact Development Best Management Practices for all the build alternatives, relating to the post-construction and hydromodification requirements for the Los Angeles County Municipal Separate Storm Sewer System National Pollutant Discharge Elimination System permit. The EPA supports the groundwater disposal plan in the event that long-term contaminated groundwater dewatering is necessary, though the Draft EIS indicates that this is not anticipated for the Staff Preferred Build Alternative.

FA-2-7

> ***Recommendations***: We recommend the FTA and Metro continue to coordinate closely with the Los Angeles Regional Water Quality Control Board as the project design is refined and commit to all Board recommendations to protect aquatic resources. Consult with the Board for any permit compliance recommendations should long-term contaminated groundwater dewatering become necessary for any build alternative.

Superfund Sites

The EPA notes that all build alternatives for the proposed project will include at-grade construction adjacent to three contaminated cleanup sites in South Gate. The sites are Jervis B. Webb Company (CAD008339467), Cooper Drum Company (CAD055753370), and the Southern Avenue Industrial Area (CAN000905902). Any construction disturbance of soils in that area could result in the exposure and release of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBS) and inorganics (metals). Exposure to contaminated groundwater will also need to be managed. Construction work adjacent to identified Superfund cleanup sites requires coordination with the EPA and state regulators to assure that:

FA-2-8

1) workers are properly trained and use appropriate personal protective equipment,
2) construction work will not disrupt ongoing remedial actions or result in changes in site conditions which will affect cleanup progress (e.g. disturbing contaminated soil or causing contaminated groundwater to migrate in a way which would disrupt an ongoing remedial investigation),
3) contaminated media are properly characterized and managed if disturbed, and
4) responsibility for any costs associated with the management of contaminated material is clearly understood.

In the event that contaminated soil is generated during construction, the EPA would have to approve a soil management plan and final disposition of generated contaminated soil and groundwater. With respect to the three known Superfund sites in the project area, the EPA has numerous monitoring wells on and within the vicinity of the South Gate Superfund Sites and may be adding more. All monitoring wells associated with these sites shall not be disturbed in any way and shall be protected from damage during all construction activities. The EPA shall be notified prior to working in any areas that may impact the integrity of the remedial wells for any of these sites. FA-2-9

***Recommendations*:**

- Review the site information for each Superfund site in the project area and confirm that the Final EIS includes up to date information in the Affected Environment and Impact Analysis sections: https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0903253 https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0904837 https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0905902
- Contact the EPA Remedial Project Manager for all three sites (Sharissa Singh (Singh.Sharissa@epa.gov, (213) 244-1809) to coordinate effective coordination and community engagement, and to learn the appropriate contacts for outreach and meaningful feedback from the City of South Gate and the Communities for Environmental Health Action Team (CEHAT).
- Consult closely with the EPA Remedial Project Manager for all final design work in the South Gate area to establish a schedule for the EPA to review the finalized route alignment and soil vapor testing plan, and approve the contaminated soil/groundwater management plan for that project area.

FA-2-10

US Environmental Protection Agency, Region 9 – FA-2

Comment ID	Response
FA-2-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
FA-2-2	The comment regarding US Environmental Protection Agency's review of the Draft EIS/EIR and engagement in the Project has been noted.
FA-2-3	The commenter is correct that the Project (the Locally Preferred Alternative [LPA], referred to as Alternative 3 in the Draft EIS/EIR) has satisfied Transportation Conformity requirements under the Clean Air Act Section 176(c) at the regional and project scale.
FA-2-4	The Project will require realignment of freight tracks in select locations, such that the tracks will be relocated approximately 10 to 15 feet closer to some residential receptors and an equal distance farther from other receptors. This includes the area parallel to Façade Avenue between Rosecrans Avenue and the I-105 freeway. To characterize existing conditions for the Project, freight train activity in this area was monitored over nine days in 2019. The maximum number of daily freight trains recorded traversing this segment of the corridor was four trains per day, which occurred on only a single day. Typically, one to two trains per day passed through the area. Implementation of the Project will not increase the frequency of freight train activity anywhere along the corridor; therefore, the average daily emission rate of diesel particulate matter from freight train propulsion will not increase as a result of the Project relative to existing conditions near the sensitive receptors. Section 6.3.2 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* and Section 4.5.5.3 in Chapter 4 of the Final EIS/EIR has been updated to include a discussion of particulate emissions from freight train movement. Emissions produced by two locomotives passing by per day are intermittent and of minor magnitude given that the trains will be within 50 feet of the residences for only a matter of minutes per day. Exposures to diesel particulate matter are based on 24-hour average and annual average concentrations as there is no acute reference exposure level established. Dispersion modeling of two train pass-bys per day relocated by 10 to 15 feet from their current location will not produce meaningful results related to chronic (24-hour) diesel particulate matter exposure. Alternative 3 is identified as the LPA in the Final EIS/EIR. As presented in Table 4.19.10 of the Draft EIS/EIR, construction of Alternative 3 will not result in daily emissions of air pollutants in excess of any applicable South Coast Air Quality Management District (SCAQMD) regional threshold, including nitrogen oxide (NO_X) emissions from haul trucks. Because regional thresholds will not be exceeded, additional measures to reduce haul truck NO_X emissions are not required. There is no significant impact related to NO_X emissions from construction of the LPA.

Comment ID	Response
FA-2-5	Refer to response to comment FA-2-4 related to freight rail emissions. Long-term operational air pollutant emissions will not increase as a result of the freight track relocation; therefore, there will not be long-term health-related impacts from the LPA related to freight track relocation. Separately, the light rail transit train cars for the LPA will be propelled by electricity and will not produce engine emissions. The SCAQMD established Localized Significance Thresholds screening values to evaluate whether near-source concentrations of pollutants generated by on-site construction activities (e.g., equipment exhaust and fugitive dust) could potentially reach levels that would be of concern to public health and nearby sensitive receptors. As presented in Chapter 4, Section 4.19.3.5, Table 4.19.10 of the Draft EIS/EIR, Alternative 3 construction activities will not result in daily emissions of air pollutants in excess of any applicable SCAQMD regional threshold, including NO_X from haul trucks. Although the Draft EIS/EIR disclosed potentially significant air quality impacts during construction of Alternatives 1 and 2, the construction analysis determined that Alternative 3 would not result in significant air quality impacts. As discussed in Section 4.19.3.5 of the Final EIS/EIR, impacts to air quality for the LPA are unchanged from those presented for Alternative 3 in the Draft EIS/EIR. Construction activities related to the LPA will not result in adverse effects related to air quality; therefore, no mitigation measures related to haul trucks emissions are required to reduce NO_X emissions.
FA-2-6	Metro will continue to coordinate with the affected jurisdictions during design, construction, and operation of the Project. Per Master Cooperative Agreements being executed with cities, cities will have the opportunity to review design packages and provide comments. Metro has continued to coordinate with City of Huntington Park staff regarding intersection improvements and traffic operations since circulation of the Draft EIS/EIR. Following meetings with the City of Huntington Park in June and September 2022, and a site visit in July 2022, the design has been updated to include opening crossings that were proposed to be closed in the Draft EIS/EIR, closing other at-grade crossings that were proposed to remain open in the Draft EIS/EIR, and implementing left-turn restrictions as requested by the city. The traffic analysis for the Final EIS/EIR has been updated to reflect these changes. Refer to Chapter 3, Section 3.4.1.2 of the Final EIS/EIR for the updated analysis and Section 3.5.2.1 for the updated mitigation.
FA-2-7	Chapter 4, Section 4.11.1.1 of the Draft EIS/EIR, under the subheading “State” discusses the Project’s commitment to comply with waste discharge requirements developed by the Regional Water Quality Control Board (RWQCB) and to be regulated by the Los Angeles Regional Water Quality Control Board. Chapter 4, Section 4.11.3.1 of the Draft EIS/EIR indicates that design features will be reviewed and confirmed by Metro. Metro is committed to ongoing coordination with stakeholders throughout the project development, including the RWQCB.

Comment ID	Response
FA-2-8	Project measures for operation and construction of the Project were identified in Chapter 4, Sections 4.10.4 and 4.19.3.10 of the Draft EIS/EIR for contaminated sites along the alignment. Specifically, Project Measures HAZ PM-3 (Contaminated Soil, Soil Vapor, and Groundwater [Operation]) discussed in Section 4.10.4.1, and HAZ PM-9 (Contaminated Soil, Soil Vapor, and Groundwater) discussed in Section 4.19.3.10 of the Draft EIS/EIR, require regulatory notification (e.g., USEPA, the Department of Toxic Substances Control, and RWQCB) for open and closed cases where operation or construction of the Project involves plans to alter the use of the site and/or disturb contaminated soil and/or groundwater onsite. This notification allows the regulatory agency to determine the level of investigation and/or remediation necessary on a case-by-case basis. A closure or no further action determination letter from the regulatory agency will be obtained for the contaminated site when investigation and/or remediation is complete. Project Measures HAZ PM-3 and HAZ PM-9 also require that the contractor and operator retain a qualified environmental consultant to prepare a Soil Management Plan, Soil Vapor Management Plan, Soil Reuse Management Plan, and Groundwater Management Plan or a combined Soil, Soil Vapor, Soil Reuse, and Groundwater Management Plan to address the possibility of encountering soil, soil vapor, and groundwater during project construction and operation.
FA-2-9	See response to comment FA-2-8. Project Measure HAZ PM-9 (Contaminated Soil, Soil Vapor, and Groundwater) includes the requirement to prepare a Soil Management Plan prior to ground-disturbing activities for the Project. The plan can be provided to USEPA. Metro requested and received location identification of groundwater wells from USEPA in February 2023. This information has been added to Section 4.14.4.1 of the *West Santa Ana Branch Transit Corridor Project Final Hazardous Materials Impact Analysis Report* and Section 4.14 of the Final EIS/EIR. The information was reviewed to determine if construction would affect wells. As discussed in Chapter 4, Section 4.19.3.10 of the Final EIS/EIR, with implementation of HAZ PM-4 (Handling, Storage, and Transport of Hazardous Materials or Wastes), HAZ PM-5 (Property Assessment–Phase I and II Environmental Site Assessments), HAZ PM-7 (Disposal of Groundwater), and HAZ PM-9 (Contaminated Soil, Soil Vapor, and Groundwater), construction of the Project will not result in adverse effects related to environmental concern sites. Protection of the Superfund site monitoring wells and other potential remedial systems during operation and construction will be discussed and planned for as part of HAZ PM-3 (Contaminated Soil, Soil Vapor, and Groundwater [Operation]) and HAZ PM-9 (Contaminated Soil, Soil Vapor, and Groundwater). Metro is the generator of soils from Metro projects and is responsible for the profiling, disposition, and disposal of contaminated soils and groundwater under manifest. Copies of the Soil Management Plan and associated data can be provided to USEPA.
FA-2-10	See response to comment FA-2-9. Updated Superfund site status information has been added to Section 4.14.4.1 of the *West Santa Ana Branch Transit Corridor Project Final Hazardous Materials Impact Analysis Report.* As stated in Project Measures HAZ PM-3 (Chapter 4, Section 4.10.4.1 of the Draft EIS/EIR) and HAZ PM-9 (Chapter 4, Section 4.19.3.10 of the Draft EIS/EIR), USEPA will be notified for open and closed cases where Metro's construction or operation of the Project involves plans to alter the use of the site and/or disturb contaminated soil and/or groundwater onsite. This notification allows the regulatory agency to determine the level of investigation and/or remediation (performance standards) necessary on a case-by-case basis.

STATE AGENCIES

California Department of Transportation

From: Wong, Alison@DOT <Alison.Wong@dot.ca.gov>
Sent: Tuesday, September 28, 2021 7:06:53 PM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Lu, Janice C@DOT <Janice.Lu@dot.ca.gov>; Kayoda, Kaz T@DOT <kaz.kayoda@dot.ca.gov>; Le, Thoa@DOT <thoa.le@dot.ca.gov>
Subject: West Santa Ana Branch Comment Letter

Hi Meghna,

Caltrans' comment letter for the West Santa Ana Branch Draft EIS/EIR is attached. Please also expect a signed letter in the mail from us soon! SA-3-1

Thank you,

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Making Conservation a California Way of Life.

September 28, 2021

Ms. Meghna Khanna
Project Manager
Metro
One Gateway Plaza, MS 99-22-7
Los Angeles, CA 90012

Dear Ms. Khanna:

Thank you for the opportunity to comment on the West Santa Ana Branch Draft Environmental Impact Statement/Environmental Impact Report and for coordinating with Caltrans staff throughout the project development process. As participating and cooperating agency, Caltrans looks forward to continued communication with Metro as the project moves forward. The Study Area crosses state and interstate freeways at several locations, and the Caltrans team has the following comments on those portions of the project, separated by subject. SA-3-2

Air Quality

- Section 1.5: Section 93.116(a) of the conformity rule requires that conformity analyses consider the full time frame of the conforming transportation plan; and the project should also analyze peak emissions according to the latest EPA conformity guidance. It is suggested to consider the horizon year of the latest conforming RTP (2020 RTP/SCS) of 2045 and the opening year of 2028. SA-3-3
- Section 1.5.1: Section 1.5 notes that the entire South Coast Air Basin represents the "affected area" on which VMTs are estimated based and, in turn, from which emissions are estimated. The boundary of the Basin (or affected area) encompasses counties of Riverside and San Bernardino. Section 1.6.1 in the Draft EIR/EIS, on the other hand, delineates travel market and study area; but Riverside or San Bernardino Counties are not identified as origin or destinations. It is suggested to clarify: how this project affects travel to and from Riverside and San Bernardino Counties; and how an evaluation of changes in emissions in Riverside or San Bernardino Counties is relevant. SA-3-4
- Section 1.5.2, Page 1-12: According to Table 2.2, 4 or 5 parking facilities are proposed as part of the Alternatives. These parking facilities are stationary sources similar to the maintenance support facility. The parking facilities, however, were not considered in any of the operational analyses in the same fashion as the MSF. SA-3-5
- Section 2.2, Page 2-7: It is suggested to revise all references to the latest conforming 2020 RTP/SCS throughout the report. SA-3-6

- Table 2.2: Freeway crossings should include I-10 and US 101 for some Alternatives. SA-3-7
- Tables 4.2 through 4.4: It is suggested that the monitoring data be updated with more recent years. SA-3-8
- Section 5.2.1.3: Section 7.1 notes that the construction would take approximately 6 years and the RTP 1TR1011 identifies the project completion in 2028. However, the FTIP ID LA0G1094 is currently identified as a study, not a project, and does not identify any programmed allocations in the next 6 years for construction or right-of-way activities. FTIP ID LA0G1094 erroneously identifies that this project is associated with RTP ID 1TR1017, not 1TR1011. SA-3-9
- Page 5-5, CO Analysis: It is suggested that the CO analyses consider such stationary sources as the proposed parking facilities. SA-3-10
- Section 5.2.2.3: There are 4 Alternatives with significantly different alignments; but only one FTIP ID is identified for conformity demonstration. Which alignment is currently identified in the regional model for conformity demonstration and will the project be able to be amended to the FTIP (and RTP) if a different alignment is selected as a preferred alternative? SA-3-11

Biology

- It appears that many of the highway crossings are existing rail routes. However, we are concerned that construction activities associated with development or modification of highway crossings could have impacts to biological resources within Caltrans' right of way. Concerns include excavation and grading impacts, clearing and grubbing impacts, noise and vibration impacts from construction work and potential pile driving, impacts to nesting birds and roosting bats (including urban populations), invasive species impacts, as well as permanent impacts of the project footprint. If excavation and grading occur within Caltrans' right of way, these activities could impact small mammals, reptiles, and insects within our right of way. SA-3-12
- If rail constantly travels beneath our freeways through Caltrans' existing box tunnel structures, this could have permanent noise impacts which would affect nesting birds and roosting bats within joints and cracks in our freeway structure. SA-3-13
- If clearing and grubbing would occur within Caltrans' right of way, this could impact nesting birds, bats, and sensitive plant species within Caltrans' right of way. In addition, clearing and grubbing could cause a spread of invasive plant species within Caltrans' right of way. It could also impact large, mature trees that birds use for roosting, foraging, and breeding habitat. SA-3-14
- Invasive plant species are not discussed in the Final Biological Resources Impact Analysis Report, but should be addressed, not only for their propensity to spread, but also that no invasive species will be used in any planting plans. SA-3-15

- California Department of Fish and Wildlife has defined the nesting season for passerines as starting February 1. This is the date Caltrans uses as the beginning of the bird nesting season. SA-3-16

Communities and Neighborhoods/Environmental Justice

- Consider using tools like CalEPA's California Communities Environmental Health Screening Tool (CalEnviroScreen) or US EPA's Environmental Justice Screening and Mapping Tool (EJSCREEN) to further investigate potential impacts to disadvantaged communities. SA-3-17
- Page 4-875 discusses that noise and vibration impacts to residential and other sensitive receptors remain adverse even after mitigation. We suggest including additional measures to further mitigate operational noise impacts from the project to nearby residents and other sensitive receptors. SA-3-18
- There are some discrepancies in the Environmental Justice discussion throughout the document. The Summary (Page S-74) states that for traffic operation, the project would result in a disproportionately high and adverse effect to the environmental justice community of Huntington Park, but the Environmental Justice section of the document states no disproportionately high and adverse effect. SA-3-19 Similarly, environmental justice discussion pertinent to noise and vibration is confusing. We suggest revising the analysis to be consistent and to include additional measures to address any disproportionately high and adverse effects to environmental justice communities. SA-3-20

Corridor Management

- Pages 55, 211, 213, and 214: There are new proposed stations, park and ride facilities that are close to the on/off-ramps on Route 91 and Route 105. Should those on-/off-ramps be studied since there are more vehicle trips will be added to the on-/off-ramps? SA-3-21
- Page 224: Is this proposed new parking space? SA-3-22

Cultural

- Has the Revised Preliminary Cultural Resources Effects Report been submitted to the State Historic Preservation Officer (SHPO)? Please include the response or the proposed timeline for submittal and any comments or questions from SHPO or her staff regarding the proposed project when received. The document should discuss coordination with SHPO and other consulting parties and the outcome of the coordination. SA-3-23
- Caltrans has concerns about the Revised Preliminary Cultural Resources Effects Report in Appendix X regarding the expected effects and impacts to Century Freeway- SA-3-24

Transitway Historic District. Please disclose or describe expected effects and impacts to the Historic District and specify a requirement for design review and approval by a qualified historic Architect for the proposed four new bridge designs, post-construction replacement of character-defining landscape features or proposed Green Line platform alterations and improvements (including platform station improvements, elevators, escalators, stair enclosures, and soundwalls) for conformance with the Secretary of the Interior's Standards for Rehabilitation. SA-3-24

- The comments below address the analysis in Appendix X specifically, but they also apply to any summary in the EIS/EIR.

Effects/Impacts Analysis

- In Section 5, Effects/Impacts Analysis section of the technical report, please elaborate on the effects or impacts caused by the proposed project to the Century Freeway-Transitway Historic District. Caltrans disagrees that "The construction and operation of Alternatives 1, 2, 3, and 4 would result in no adverse effect/less than significant impacts to this historic property/historical resource and no minimization/mitigation measures are required" (page 5-166), given the proposed demolition of three contributing bridges and landscape and changes to the contributing light rail or to the mainline of the freeway lanes, which are each historic fabric of and were identified as contributing features to the Century Freeway-Transitway Historic District. SA-3-25

- Caltrans finds that the effects and impacts expected to be caused by the proposed project were not adequately discussed, and no build alternatives were analyzed that would avoid or lessen the effects and impacts that would be caused to the Century Freeway-Transitway Historic District. If the effects on to the Century Freeway-Transitway Historic District had been more thoroughly analyzed, the proposed project build alternatives would likely have been found to cause an adverse effect or impact to the historic district. Please revise the documents to adequately analyze the impacts of the project on the Century Freeway-Transitway Historic District. SA-3-26

- The term "reconstruction" is misused in the technical document and is potentially misleading in the context of historic preservation practice and actual project plans and measures. The National Park Service directs "Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location" (The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, 2017). Reconstruction as a treatment is not applicable to extant contributing features that are proposed for demolition and would subsequently be constructed in different configurations. "Rehabilitation" is likely the appropriate treatment to be used in designing the proposed new bridges. Each of the three bridges, Façade Avenue SA-3-27

Overcrossing, Century Boulevard UP and Arthur Avenue Pedestrian and Utility Overcrossing unless specified otherwise, can be expected to be replaced by bridges that possess different characteristics than the existing bridges including visual qualities, including overall appearances, widths, distances among them, immediate and surrounding settings, materials, workmanship and in some cases, uses of the existing bridges. SA-3-27

Century Boulevard UP Bridge

- Appendix X does not clearly disclose that the Century Boulevard UP bridge (approximately 30-foot-wide in its existing state) would be replaced by two separate bridges, which are expected to be 74 feet or more wide. Additionally, Caltrans disagrees with the statement under bridge modification that they "would be reconstructed to maintain the rhythm of bridges that occurs throughout district," because none of the existing, contributing bridges are spaced that closely, which means that the physical spacing seen by motorists, users of the light rail, and passersby would be changed. The statement that the bridges were "not identified as eligible for architecture or engineering" is incorrect and inconsistent with the Finding of Effect prepared for the I-105 ExpressLanes project (December 2020). SA-3-28 SA-3-29

- Based on the distinctive bridge barrier designs and detailing, the FOE for the I-105 ExpressLanes project concluded that the bridge widenings with rehabilitation and reconstructed decorative barrier treatments was not expected to cause an adverse effect. However, the proposed bridge replacements at Century Boulevard UP bridge would include a 20-foot-wide freight bridge with no accommodation for an access road, which currently exists on the freight bridge. It would be adjacent to and require construction of a second, 46-foot-wide, separate light rail bridge with fewer than 10 feet separating the new bridges (Appendix B – SHPO Consultation), which would be considerably larger and wider than the existing single overcrossing. Additionally, no mention was made of the proposed appearances of the new bridges or comparisons between existing and proposed (*e.g.* rail height, bridge depth top-to bottom, numbers of bents, types of abutments, materials, colors and finishes). Proposed replacement bridges would further contain additional improvements including an unknown number of OCS poles and catenary wires that would be far different in appearance, and likely requiring higher fences and railings than existing. SA-3-30

- Access roads required by UPRR/BNSF for inspections, maintenance and passage are a minimum of 13 feet in width at present. The railroad specifies, "The outside edge of the Access Road shall be located a minimum of 27 feet from the centerline of the nearest existing or future track" (*UPRR/BNSF Guidelines for Railroad Grade Separation Projects,* May 2016). Those railroad guidelines also direct that "If a bridge maintenance structure is not provided, an Access Road with a turnaround shall be designed and constructed in conjunction with the grade separation bridge structure." Caltrans staff SA-3-31

expects that the replacement railroad bridge would be considerably be wider than depicted and analyzed. If no access road would be included, would turnarounds north and south of the proposed new railroad bridge be required as well? They should also be analyzed. SA-3-31

Light Rail Platform Alterations

- Proposed alterations to the extant light rail alignment and its width, the addition of a platform, canopies, elevator, escalator and stair enclosures (vertical circulation elements) as well as soundwalls depicted in the plans at the light rail platform and the demolition of existing historic fabric should be fully explained and designed to be differentiated and compatible with the existing facility, in conformance with the Secretary of the Interior's Standards for Rehabilitation, subject to review and approval by a qualified Historic Architect to avoid an adverse effect or an impact. SA-3-32

Cumulative Impact

- Please elaborate on the cumulative impacts to the Century Freeway-Transitway Historic District by other known projects with the proposed project. Proposed alterations to the I-105 ExpressLanes Project, I-105/I405 Tunnel Lighting, Rosa Park Station Improvement Project, Vermont Transit Corridor, Crenshaw/LAX Transit Project, Crenshaw Northern Extension Project, and Airport Metro Connector or C Line (Green) Extension to Torrance could each be expected to cause small effects and impacts to the Century Freeway-Transitway Historic District that could become cumulatively considerable, including both direct and indirect effects. How many bridges and light rail stations are proposed to be altered or demolished as parts of these recent and future projects? SA-3-33

Consulting Party Status Request

- Based on the identification of these Cultural Resources issues and as the legal owner of the I-105 Century Freeway-Transitway Historic District, Caltrans herewith requests consulting party status for this project under Section 106 of the National Historic Preservation Act, pursuant to 36 CFR Section 800.2 (a) (2), 800.2 (c) (5) and 800.3(f) (3). Please contact Caltrans Environmental, Cultural Resources unit with your agency's response and all project-related Cultural Resources technical reports, SHPO responses and environmental documents via e-mail at claudia.harbert@dot.ca.gov (subject line: Metro WSAB Project Consulting Party). Kindly consider and respond to this written consulting party request within 30 days of its receipt. SA-3-34

Section 4(f)

- The Section 4(f) determination for the Century Freeway-Transitway Historic District may change depending on whether effects are found to be adverse. If they are found to be SA-3-35

adverse, the Section 4(f) analysis should be an individual evaluation rather than *de minimis*. SA-3-35

Visual/Aesthetics SA-3-36

- On pages 24 and 25, it is difficult to distinguish between the symbols for at-grade, underground and aerial.
- Structures within Caltrans right of way (including aerial structures crossing over freeways) shall have aesthetic treatment commensurate with aesthetic enhancements provided to municipalities and Metro facilities. Aesthetics on structures should have concurrence from Caltrans Engineering Services (DES) and the project Landscape Architect. SA-3-37
- Landscaping disturbed by the project shall be replaced in kind or as agreed upon by the Caltrans project Landscape Architect. Any irrigation disturbed by the project shall be replaced or repaired to be fully functional and connected to the remainder of the irrigation system. Any bare soil will be given a suitable ground cover of planting, hardscape or a 4" deep layer of mulch, with the concurrence of the Caltrans project Landscape Architect. SA-3-38
- Sound walls placed within the State right of way shall have suitable aesthetic design, with the concurrence of the Caltrans project Landscape Architect. SA-3-39

Hydraulics/Water Resources

- While most of the alternatives cross Caltrans freeways, there was no mention of drainage impacts at Caltrans' freeway crossings. Are there any impacts to drainages at those locations? If so, what will be the impact and how it will be mitigated? SA-3-40

General

- Please indicate in the document that Caltrans will be a cooperating agency under NEPA and a responsible agency under CEQA. SA-3-41

Thank you for considering our comments on the Draft EIS/EIR. If you have any questions, please contact Thoa Le at thoa.le@dot.ca.gov.

Sincerely,

RON KOSINSKI
District Director
Division of Environmental Planning

California Department of Transportation – SA-3

Comment ID	Response
SA-3-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
SA-3-2	The comment regarding coordination with Caltrans is noted.
SA-3-3	The U.S. Environmental Protection Agency submitted a comment letter that stated the Project satisfies Transportation Conformity requirements under the Clean Air Act Section 176(c) at the regional and project scale (included in this appendix as FA-2). No further conformity analysis is required by the Federal Transit Administration (FTA), which is the National Environmental Policy Act Lead Agency. The year 2042 was selected as the horizon year for the Project based on FTA standard practice of a 25-year planning timeframe from the date the Notice of Intent was published in the Federal Register (June 26, 2017). A refined emissions analysis using a horizon year of 2045 based on the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and an opening year of 2028 is not necessary to adequately evaluate the potential air quality impacts of the Project or to meet the Transportation Conformity requirements. Typically, in a CEQA analysis, project-related impacts are compared to existing (without project) conditions as of the date that the notice of preparation of the Draft EIR was issued (May 25, 2017 for the WSAB Draft EIS/EIR). In 2017, the most recently approved conforming transportation plan was the Southern California Association of Governments (SCAG) 2016-2040 RTP/SCS, as the 2016-2040 RTP/SCS Amendment #2 and the 2017 Federal Transportation Improvement Program (FTIP) Consistency Amendment #17-07 received federal approval of the transportation conformity determination on August 1, 2017. As summarized in the introduction to Chapter 4 of the Draft EIS/EIR, the 2016 and 2020 RTP/SCS socioeconomic data were compared for the WSAB Study Area. The results of the comparison for future year 2042 show a less than 1 percent difference in the population and employment growth forecasts for Los Angeles County and for the Study Area. After circulation of the Draft EIS/EIR, the *West Santa Ana Branch Transit Corridor Project Final RTP/SCS Study* was prepared and it compared the differences between the SCAG 2016-2040 RTP/SCS and the Connect SoCal (2020 RTP/SCS) regional forecast (e.g., population, housing, and employment). Based on the conclusions presented in the *West Santa Ana Branch Transit Corridor Project Final RTP/SCS Study,* updated analysis using Connect SoCal's growth forecast as baseline data was not conducted because the results and findings would not be substantially different than what was presented in the Draft EIS/EIR. Connect SoCal is included in Section 4.5 of the Final EIS/EIR to address consistency with regional conformity. Specifically, in Section 4.5.3.2 of the Final EIS/EIR, the Locally Preferred Alternative (LPA) is listed in the Connect SoCal Transportation System Financially Constrained Project List as a LA County transit project under the RTP ID 1TR1011 ("West Santa Ana Branch Transit Corridor LRT"). Connect SoCal Amendment #3 received federal approval of the transportation conformity determination from the Federal Highway Administration (FHWA) and FTA on June 9, 2023. Section 5.3.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (previously Appendix J of the Draft EIS/EIR) was also updated to reference the current conforming RTP/SCS. Therefore, the Final EIS/EIR addresses air conformity consistent with the 2020 RTP/SCS.

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	The air quality analysis performed for the Draft EIS/EIR used 2017 conditions as the existing conditions baseline. For the air quality analysis, the projected future conditions baseline (no Build) is 2042. To calculate project-specific air pollutant emissions, the air quality impact analysis compared the emissions of the Build Alternatives in the year 2042 against the 2017 and 2042 baseline (No Build) conditions. Use of the 2042 analysis year provides informational value and is based on substantial evidence. An additional emissions analysis using a horizon year of 2045 and an opening year of 2028 is not necessary to adequately evaluate the potential air quality impacts of the Project or to meet Transportation Conformity requirements.
SA-3-4	The South Coast Air Basin is an appropriate "Affected Area" for the air quality analysis. Ozone is formed by complex atmospheric interactions between two or more reactive organic gas compounds (including volatile organic compounds and nitrogen oxides) in the presence of ultraviolet sunlight. This formation often occurs many miles from the source of emissions due to a variety of reasons, including wind. Accordingly, for regional pollution emissions, the appropriate Affected Area is the South Coast Air Basin. The travel analysis of the Affected Area reflects travel decisions throughout the entire region. Both Riverside and San Bernardino Counties are distinct districts of the analysis. However, given the distance from the project Study Area, travel between Riverside and San Bernardino Counties and the Study Area accounts for less than 1 percent of the overall Study Area trips. While Riverside and San Bernardino Counties are not a focus of the study analysis, any changes in travel behavior from trips to or from Riverside and San Bernardino Counties that travel through the Study Area are accounted for in the vehicle miles traveled and emission estimates for the Affected Area.
SA-3-5	Parking facilities are not considered stationary sources. According to the South Coast Air Quality Management District (SCAQMD), "air pollutant emissions sources are typically grouped into two categories: stationary and mobile sources. Stationary sources are further divided into two major subcategories: point and area sources. Point sources consist of a single emission source with an identified location point at a facility. Area sources are small emission sources that are widely distributed, but may have substantial cumulative emissions; examples include residential water heaters, small engines, and consumer products, such as barbeque lighter fluid and hair spray." At the state emissions inventory scale, the California Air Resources Board (CARB) identifies stationary sources as, "non-mobile sources such as power plants, refineries, and manufacturing facilities which emit air pollutants." The proposed park-and-ride facilities do not fit the definition of stationary sources; rather park-and-rides are facilities that mobile sources travel to and from in connection with using the Project. The park-and-ride locations are not characterized by any permanent, stationary sources of emissions themselves, and air quality regulatory agencies do not classify them as stationary sources. Travel activities of vehicles entering or exiting park-and-ride facilities are accounted for in the Metro Travel Demand Model and included in the regional vehicles miles traveled used to estimate project emissions. Regarding potential hot spots caused by on-site emissions, carbon monoxide (CO) serves as an indicator of localized hot spots resulting from traffic congestion or in areas where vehicles travel slowly and/or congregate. The use of CO as an indicator of localized hot spots is supported by the Caltrans CO Protocol. Although the basin is designated as a maintenance area for CO, it is no longer a pollutant of concern in the region. This is evident in the ambient air quality monitoring data. The National Ambient Air Quality Standards (NAAQS) for CO was last exceeded 20 years ago in 2002 according to the CARB. The SCAQMD last published data for 2020, which included maximum 1- and 8-hour concentrations of 4.5 ppm and 3.1 ppm, respectively. These concentrations were substantially below the 1- and 8-hour NAAQS of 35

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	ppm and 9 pm (representing approximately 13 percent and 34 percent of the respective standards), as well as the more stringent 1-hour CAAQS of 20 ppm. Furthermore, the CARB EMFAC model indicates that CO emission rates would be substantially less in 2028 (the opening year of the Project assumed in the Draft EIS/EIR) than in 2003 when CO attainment was demonstrated in the Air Quality Management Plan. For example, the running exhaust emission rate for a gasoline passenger vehicle was 5.02 grams per mile in 2003 and is anticipated to be 0.51 gram per mile in 2028. The idling exhaust emission rate for a diesel truck was 5.27 grams per vehicle per day in 2003 and is anticipated to be 0.12 gram per vehicle per day in 2028. The combination of the ambient monitoring data and the changes in CO emission rates indicate that there is no potential for parking facilities to generate a CO hotspot. Since circulation of the Draft EIS/EIR, the opening year for the LPA has been updated to 2035. Aggregate average emission rates in 2035 would be even lower than those in 2028, reflecting a greater reduction from the 2003 emission rates used in the attainment demonstration. There is no possibility of localized pollutant hot spots occurring as a result of vehicles circulating around the proposed parking facilities.
SA-3-6	See response to comment SA-3-3.
SA-3-7	Table 2.2 of the Draft EIS/EIR identifies the existing transportation network and planned improvements that are included in the 2042 No Build Alternative. It is assumed this comment is in reference to Table 2.3 in the Draft EIS/EIR, which identified components associated with each Build Alternative, including freeway crossings. The table identified the number of freeway crossings and provided specificity for those freeways where the alignment crosses under the freeway. Table 2.3 lists 6 freeway crossings for Alternative 1, which includes the I-10 and US-101 freeways, and each crossing is further described in Section 2.5.2 of the Draft EIS/EIR. The Alternative 1 alignment in the Draft EIS/EIR was proposed underground at the US-101 freeway and would cross over I-10.
SA-3-8	Tables 4.5.6 and 4.5.7 in Chapter 4, Section 4.5 of the Final EIS/EIR include updated monitoring data for 2018 and 2019, which reflects 5 years of data from the date of the Notice of Intent. Updates are also included in Tables 4.2 through 4.4 in the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (previously Appendix J of the Draft EIS/EIR). The attainment designations for the Los Angeles County portion of the South Coast Air Basin have not changed since 2017.
SA-3-9	The RTP ID associated with the Project has been updated to RTP ID 1TR1011. The RTP entry for the LPA was updated within Draft Amendment #3 to the 2020-2045 RTP/SCS, with changes comprising an update of the opening year and a decrease of the project cost associated with the length of the LPA alignment relative to other alternatives assessed in the Draft EIS/EIR. Amendment #3 was approved in June 2023. The project description update included in Amendment #23-03 for the 2023 FTIP (Project ID LA0G1094) reflects the LPA. Appendix B to the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* includes conformity documentation. The construction schedule for the Project has been updated since circulation of the Draft EIS/EIR. As noted in Section 2.5.2.7 in Chapter 2 of the Final EIS/EIR, revenue service is anticipated to begin in 2035.
SA-3-10	See response to comment SA-3-5. Although the basin is designated as a maintenance area for CO, it is no longer a pollutant of concern in the region. The combination of the ambient monitoring data and the changes in CO emission rates indicate that there is no potential for parking facilities to generate a CO hot spot.

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SA-3-11	See response to comment SA-3-9. All four Build Alternatives included in the Draft EIS/EIR went through the SCAG interagency consultation process and were determined not to be projects of air quality concern by the Transportation Conformity Working Group, comprised of representatives from the U.S. Environmental Protection Agency, FTA, and FHWA. The SCAG 2023 FTIP Consistency Amendment #23-03 to the Connect SoCal 2020-2045 RTP/SCS Amendment #3 identifies the LPA (Alternative 3 within the Draft EIS/EIR) as the segment from Pioneer Station in the City of Artesia to the Slauson/A-Line Station (RTP ID 1TR1011).
SA-3-12	As discussed in Chapter 4, Section 4.19.3.8 of the Draft and Final EIS/EIR, Mitigation Measures BIO-1 (Bats) and BIO-2 (Nesting Birds) will be implemented in the Affected Area for bio during construction, including during construction within Caltrans right-of-way. If bats are present during construction, disruptive construction activities within 100 feet of an active maternity roost will be delayed until after the maternity season. Similarly, if construction occurs within the peak bird breeding season and active nests are found, an appropriate avoidance buffer will be determined by a qualified biologist prior to ground and/or vegetation disturbance activities. Therefore, no adverse effects related to bats and nesting birds will occur as a result of project construction. Additional information on construction-related impacts to biological resources within Caltrans right-of-way is available in Section 5.2.6 of the *West Santa Ana Branch Transit Corridor Project Biological Resources Impact Analysis Report* (previously Appendix N of the Draft EIS/EIR). Potential project impacts to special-status species are not anticipated.
SA-3-13	Caltrans rights-of-way, including the interiors of box tunnel structures, currently experience high levels of transportation noise. While LRT operations would add to the existing transportation noise, the sound exposure levels from each LRT vehicle pass-by is less than for a heavy truck. As such, the incremental noise effect to nesting birds and roosting bats that are already acclimated to the elevated transportation noise levels within a right-of-way is not anticipated to be substantial. As stated in response to comment SA-3-12, Mitigation Measure BIO-1 (Bats) will be implemented during construction. This measure has been revised in Chapter 4, Section 4.19.3.8 of the Final EIS/EIR and in Section 6.2.2 of the *West Santa Ana Branch Transit Corridor Project Final Biological Resources Impact Analysis Report* (previously Appendix N to the Draft EIS/EIR) to include a California Department of Fish and Wildlife-approved bat relocation plan, including evaluation of the availability of nearby alternative bat maternity colony sites. If alternative roosting habitat is not available, substitute maternity roost sites would be installed prior to relocation efforts. Any substitute maternity roost sites installed to address construction effects would remain in place to offer long-term roosting-site replacement for bats that select not to return to previously used structures. With implementation of this measure, project operation would not result in adverse effects to special-status bats. The loss of habitat for nesting birds within joints and cracks in the freeway structure would not result in a meaningful reduction in the availability of habitat for nesting birds.
SA-3-14	As discussed in Chapter 4, Section 4.8.2.2 of the Draft EIS/EIR, suitable habitat for special-status plant species is not present within the Affected Area for biological resources, including within Caltrans right-of-way. Accordingly, no mitigation measures are required for impacts to special-status plant species. See response to comment SA-3-12 regarding bats and nesting birds. Vegetation that may provide roosting, foraging, and breeding habitat for nesting birds would be removed in accordance with Mitigation Measure BIO-2 (Nesting Birds), but would not result in a meaningful reduction in the availability of habitat for nesting birds. As discussed during meetings with Caltrans, trees removed during construction within Caltrans right-of-way at I-105 (i.e., the Century Freeway-Transitway Historic District) will be replaced at a 1:1 ratio. Minimal additional trees at other Caltrans crossings may be impacted by

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	construction of the Project. Metro will continue to coordinate with Caltrans regarding tree loss within Caltrans right-of-way (ROW) and potential replacement locations as applicable. A discussion on invasive plant species has been added to the Final EIS/EIR in Chapter 4, Section 4.19.3.8, and in Section 5.2.2.3 of the *West Santa Ana Branch Transit Corridor Project Final Biological Resources Impact Analysis Report* (previously Appendix N to the Draft EIS/EIR). Project Measure BIO PM-1 (Invasive Plant Species Best Management Practices) has been added to provide best management practices to prevent the spread of invasive plant species during construction. This measure is summarized in Chapter 4, Section 4.19.3.8 of the Final EIS/EIR and Section 6.1.2 of the *West Santa Ana Branch Transit Corridor Project Final Biological Resources Impact Analysis Report* (previously Appendix N to the Draft EIS/EIR).
SA-3-15	A discussion on invasive plant species has been added to the Final EIS/EIR in Chapter 4, Section 4.19.3.8, and in Section 5.2.2.3 of the *West Santa Ana Branch Transit Corridor Project Final Biological Resources Impact Analysis Report* (previously Appendix N to the Draft EIS/EIR). Project Measure BIO PM-2 (Prohibition of Invasive Plant Species in Landscape Plans) has been added to clarify that no invasive species will be used in planting plans prepared for the Project. See also response to comment SA-3-14.
SA-3-16	Mitigation Measure BIO-2 (Nesting Birds) has been updated in Chapter 4, Section 4.19.3.8 of the Final EIS/EIR, and in Section 6.2.2 of the *West Santa Ana Branch Transit Corridor Project Final Biological Resources Impact Analysis Report* (previously Appendix N to the Draft EIS/EIR) to revise the starting date of the nesting season for passerines to February 1.
SA-3-17	See response CR-EJ-1 regarding the approach and guidance used for the Environmental Justice (EJ) analysis and the identification of EJ communities.
SA-3-18	In response to comments received on the Draft EIS/EIR and stakeholder coordination conducted after circulation of the Draft EIS/EIR, Metro completed additional analysis and included additional project measures, such as bell shrouds and bell stop variances (Project Measures NOI PM-1 and NOI PM-2, respectively), that will reduce the number and severity of noise impacts compared to what was identified in the Draft EIS/EIR (these measures were previously included as mitigation measures but the reduction was not included in the mitigated noise levels). Additionally, soundwall height was increased where practicable to further reduce residual noise impacts. The updated analysis is reflected in Chapter 4, Section 4.7 of the Final EIS/EIR and in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR).
SA-3-19	Chapter 4, Section 4.22.3.2 of the Final EIS/EIR and Section 5.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Environmental Justice Impact Analysis Report* (previously Appendix FF to the Draft EIS/EIR) have been updated to clarify that a disproportionately high and adverse effect to Huntington Park would occur as it relates to traffic operations.
SA-3-20	Chapter 4, Section 4.22.3.2 of the Draft EIS/EIR refers to the mitigation measures that will be implemented as part of the Project. The EJ noise analysis concluded that the Project would not result in disproportionately high and adverse effects related to noise to EJ communities. Noise impacts would not be concentrated in one EJ community and would not result in an appreciably more severe or greater in magnitude adverse effect than other areas with comparable non-EJ populations. See response CR-GEN-5 regarding the implementation and recommendation of feasible mitigation measures.
SA-3-21	Station-generated vehicle traffic and trip patterns were analyzed and further validated using Metro's Travel Demand Model. The majority of the trips were determined to have local origins, and therefore freeway access was not projected to be affected. As a result, on-/off-ramps did not require evaluation.

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SA-3-22	It is assumed this comment applies to Table 3.10 on page 3-34 in Chapter 3 of the Draft EIS/EIR (PDF page 224 in the combined Draft EIS/EIR file). This table identifies existing conditions for off-street parking along the alternatives evaluated in the Draft EIS/EIR. It does not reflect proposed or new parking. Table 2.3 in Chapter 2 of the Draft EIS/EIR identified the number of parking facilities and total number of parking spaces that would be provided under each Build Alternative evaluated in the Draft EIS/EIR. As shown, Alternative 3 would provide 5 park-and-ride facilities with up to approximately 2,795 spaces. These spaces will be dedicated to transit patrons.
SA-3-23	The *West Santa Ana Branch Revised Preliminary Cultural Resources Effects Report* (Appendix X of the Draft EIS/EIR) was not submitted to the State Historic Preservation Officer (SHPO) prior to release of the Draft EIS/EIR. However, a meeting was held with SHPO in September 2020 to discuss the preliminary findings of the analysis, inclusive of those for the Century Freeway-Transitway Historic District. A detailed summary of Section 106 consultation that occurred in support of the Project prior to release of the Draft EIS/EIR was included in Chapter 7, Section 7.7 of the Draft EIS/EIR; Chapter 4 of the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 1* (Appendix W of the Draft EIS/EIR); and Appendix B of the *West Santa Ana Branch Transit Corridor Project Revised Preliminary Cultural Resources Effects Report*. Information on consultation that has occurred since circulation of the Draft EIS/EIR is included in Sections 4.2.4 and 4.2.5 of the *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report—Rev 2*; Chapter 7, Section 7.10 of the Final EIS/EIR; and in Section 8 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report*. Copies of comment letters from SHPO and other consulting parties received after circulation of the Draft EIS/EIR are included in Appendices C and J of the *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report—Rev 2* and Appendix B of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report*. The letter received from SHPO concurring on the finding of effect is included in Appendix G of the Final EIS/EIR. The following is a summary of the SHPO consultation that occurred prior to the release of the Draft EIS/EIR, as discussed in Chapter 7, Section 7.7 of the Draft EIS/EIR: ▪ December 2018 through May 2019: Consultation among FTA, Metro, and the SHPO regarding the Area of Potential Effects (APE) delineation and historic resources screening methodology. ▪ March 2020: Submittal of the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 1* to SHPO for review and concurrence; no response was received. ▪ September 9, 2020: Meeting with representatives of FTA, Metro, and SHPO to present the preliminary assessment of effects of the Project on the Century Freeway-Transitway Historic District. The representative from the SHPO's office noted there was no objection to the proposed finding of no adverse effect to historic properties. The following bullets summarize the SHPO consultation that occurred following release of the Draft EIS/EIR, as described in Chapter 7, Section 7.10.2.3 of the Final EIS/EIR: ▪ May 11, 2023: The *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 2* was submitted to SHPO, which accounted for expansion of the APE as a result of design refinements, traffic mitigation measures, and changes in temporary construction easements; an update in the Project's construction schedule; determinations of eligibility of three river channels as a result of comments received from the United States Army Corps of Engineers on the Draft EIS/EIR; and integration of information related to one archaeological historic property/historical resource (P-19-002849) assumed eligible in the

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	West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 1, which is no longer extant. ▪ May 22, 2023: Representatives from Metro and FTA met with representatives of the SHPO's office to provide updates on the Project and discuss the recently submitted *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 2*. Meeting topics included identification of the LPA; updates to the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report* since circulation of the Draft EIS/EIR; expansion of the APE; and the cultural resources effects assessment with a focus on the anticipated findings for the Century Freeway-Transitway Historic District. The Metro team summarized the conclusion of the updated effects assessment for the Century Freeway-Transitway Historic District, stating that FTA intends to make a finding of no adverse effects to historic properties. Feedback from SHPO is included in Section 8.3 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report*. ▪ June 14, 2023: Representatives from the SHPO's office contacted FTA via email requesting clarification on the addresses of four properties that were recommended ineligible for listing in the National Register of Historic Places (NRHP) in the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 2*. FTA provided clarification regarding these properties on June 23, 2023. ▪ June 29, 2023: In a letter to FTA dated June 29, 2023, SHPO provided concurrence on the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 2*, including FTA's documentation and delineation of the APE and on FTA's determination of NRHP eligibility of three properties and NRHP ineligibility of 27 properties not included in the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 1* but included in the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 2* due to expansion of the APE following circulation of the Draft EIS/EIR. ▪ November 17, 2023: The *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Effects Report* was submitted to SHPO for review and concurrence via email. ▪ December 14, 2023: FTA was notified by a representative from the SHPO's office that review of the Project was underway and that a response letter could be expected by December 21, 2023. ▪ December 28, 2023: a representative from the SHPO's office requested a meeting with FTA to discuss the Project. The email request indicated that the project reviewer had comments and requests regarding documentation for visual effects that may be helpful to discuss with the FTA/Metro team. ▪ January 3, 2024: representatives from FTA and Metro met with a representative from the SHPO's office. The purpose of the meeting was to discuss the reviewers' questions related to the potential visual effects of the LPA, as expressed in the above-described email sent on December 28, 2023. The primary focus of the meeting was the potential effect of the LPA on the Union Pacific LA River Bridge (MRN 17-006). During the meeting, the FTA/Metro team shared images of the existing conditions of the bridge and its setting in addition to engineering drawings depicting changes to the debris walls associated with the bridge as a result of implementation of the LPA. The potential effects of the LPA on the Rio Hondo Bridge (MRN 18-015) and the San Gabriel River Bridge (MRN 29-022) were also briefly discussed; the FTA/Metro team clarified that neither of these bridges is historic. The FTA/Metro team also briefly discussed potential visual effects to Pueblo Del Rio (MRN 8-013). After the FTA/Metro team shared photographs of the existing setting surrounding Pueblo Del Rio, the SHPO representative stated that there were no concerns regarding potential visual impacts to the historic property/historical resource and that visual aids were not necessary.

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	▪ January 4, 2024: FTA received a letter from the SHPO via email. The letter provided a summary of consultation that had occurred between FTA and SHPO in support of the WSAB Project and the FTA's findings as presented in the Final Cultural Resources Effects Report. The letter requested a revised APE map that denotes APE revisions related to the depth of the depth of the geotechnical borings. Additionally, the letter requested a photo simulation or artistic rendering that illustrates what the new light rail bridge will look like next to the existing Union Pacific Los Angeles River Rail Bridge and modifying the name of the Cultural Resources Mitigation and Monitoring Program to Cultural Resources Monitoring and Discovery Program. The letter also requested SHPO review of the treatment plan prepared under Mitigation Measure CR-4 (Treatment of Unanticipated Discoveries). ▪ February 13, 2024: The *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* was updated to address comments in the January 4, 2024 letter and January 3, 2024 meeting and submitted to SHPO for review and concurrence via email. ▪ March 12, 2024: SHPO concurrence on the Finding of Effect was received.
SA-3-24	As discussed in Section 5.2.2 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* and summarized in Chapter 4, Section 4.14.3 of the Final EIS/EIR, the following project elements are proposed within the boundaries of the Century Freeway-Transitway Historic District (district/historic district): ▪ Removal and replacement of the Century Boulevard Underpass with a new LRT bridge to accommodate the project alignment and a replacement freight bridge to the immediate west of the new LRT bridge to accommodate the Union Pacific Railroad (UPRR) freight rail line that currently runs on the existing Century Boulevard Underpass ▪ Construction of a new Metro C Line infill station in the I-105 median with vertical circulation elements attached to the existing Façade Avenue Overcrossing and new LRT bridge ▪ Realignment of 2,500 feet of Metro C Line track ▪ Minimal landscaping removal and replacement The *West Santa Ana Branch Transit Corridor Project Revised Preliminary Cultural Resources Effects Report* (Appendix X of the Draft EIS/EIR) analyzed the potential impacts pursuant to CEQA and effects in accordance with Section 106 associated with the demolition and replacement of three of the district's character-defining bridges: the Century Boulevard Underpass, the Arthur Avenue Pedestrian Overcrossing, and the Façade Avenue Overcrossing. However, the Project has since been refined and now includes the demolition of only one of the district's character-defining bridges, the Century Boulevard Underpass. As the Arthur Avenue Pedestrian Overcrossing and Façade Avenue Overcrossing no longer require demolition and replacement, potential impacts to historic resources and effects to historic properties have been reduced since the Draft EIS/EIR. Additionally, the design of the replacement freight bridge has been refined from four spans to two spans, consistent with the existing bridge. Further, its superstructure will integrate a concrete relief similar to that on other bridges throughout the district. As further described below, taking into account comments received from Caltrans on the Draft EIS/EIR regarding potential effects/impacts to the historic district and consultation with Caltrans in 2021, 2022, and 2023, the analysis presented in Section 5.2.2 of the *West Santa Ana Branch Transit Corridor Project Revised Preliminary Cultural Resources Effects Report* (Appendix X of the Draft EIS/EIR) has been updated in Section 5.2.2.18 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* to more fully describe potential effects to the historic district under Section 106. Additionally, a more robust analysis for CEQA was added to Section 7.1.1.2 of that report. This information is summarized in Chapter 4, Section 4.14.3 of the Final EIS/EIR. A summary of the effects assessment in accordance with Section 106/impacts assessment pursuant to CEQA is included below. Please

Comment ID	Response
	note that the analysis in Section 5.2.2.18 has been updated to indicate that pursuant to Project Measure CR PM-1 (SOI Standards Design Review), design of the new LRT bridge and new infill Metro C Line station will be reviewed by a professional who meets the Secretary of the Interior (SOI) Professional Qualification Standards (PQS) to confirm design remains consistent with the fundamental principles of the SOI Standards for the Treatment of Historic Properties (Standards) as they advance. Additionally, as indicated in the updated analysis, any trees removed within the historic district in the APE during construction of the Project will be replaced at a ratio of 1:1, consistent with the recommendations included in the Draft Landscaping Impact Summary – I-105 ExpressLanes Project-Post Mile: R0.5 to R 18.1. Focused meetings to discuss Caltrans' comments related to the Project's potential to impact/effect the historic district were held with Caltrans, FTA, and/or Metro on December 7, 2021; April 21, 2022; February 9, 2023; March 2, 2023; and September 27, 2023. The meetings are summarized in Chapter 7, Section 7.10.2.2 of the Final EIS/EIR and Section 8.6 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* and meeting materials, including meeting summaries, are included in Appendix B of that report. Brief summaries of these meetings are as follows. ▪ December 7, 2021: The purpose of this meeting was to provide Caltrans with an overview of the Project and discuss its comments on the Draft EIS/EIR related to the historic district. Caltrans staff stated that the comments in the letter it sent to FTA and Metro were related to CEQA and not directed at Section 106 compliance. Additionally, Caltrans provided the following primary comments: potential for a substantial adverse change and material impairment to occur as a result of bridge demolition proposed by the Project; lack of information in analysis related to the design of the new bridges proposed by the Project; lack of SOI qualified design review; lack of discussion of landscaping; and potential for cumulative impacts to occur as a result of the Project and future projects combined. Caltrans provided the following recommendations to address its comments: use the CEQA checklist as a guideline for updated analysis; address potential impacts to landscaping; integrate the Project's alternative analysis into the cultural resources assessment; further consider the potential for substantial adverse change to the district; and review the finding of effect for the I-105 ExpressLanes Project for guidance. ▪ April 21, 2022: The purpose of this meeting was to provide Caltrans with an overview of the Project and an update of the analysis performed since the December 7, 2021, meeting. The following are key topics from the meeting: the proposed infill station's design; the 1:1 replacement ratio (for trees and shrubs) that will be implemented by the Project; the potential applicability of Public Resources Code (PRC) 5024 due to the fact that the district is a state-owned resource; and the status of the Project's design, including details relating to the proposed replacement freight bridge and involvement of UPRR in the design. ▪ February 9, 2023: Caltrans provided Metro with a memorandum on January 24, 2023, following review of an updated draft CEQA evaluation for the Century Freeway-Transitway Historic District. Metro met with Caltrans on February 9, 2023, to discuss the memorandum and a path forward. The meeting also included discussion of the CEQA Guidelines and their interpretation. Caltrans' cultural resources staff provided hypotheticals and examples to illustrate application of the CEQA Guidelines; however, interpretation of the CEQA Guidelines differed between Metro and Caltrans. During the meeting, Caltrans requested the following: details on alternatives that would avoid demolition of the freight bridge; a change in Metro's findings to note that the Project would have a significant impact on the district under CEQA; changes to the design to consider the number of bent piers and bridge spans, glare from soundwalls, overall aesthetics, and freight bridge design; and improved landscaping analysis to provide the specific number of trees and species affected. ▪ March 2, 2023: This meeting was a follow-up to the February 9, 2023, meeting and included Metro outside legal counsel in attendance. The purpose of the meeting was to have Metro

Comment ID	Response
	counsel respond to Caltrans' comments regarding interpretation of the CEQA Guidelines. Caltrans cultural resources staff disagreed with Metro's attorneys' interpretation of the law and restated its position from the February 9, 2023, meeting. Metro agreed to add additional detail to the CEQA analysis previously requested by Caltrans; however, parties still differed on CEQA interpretation. ▪ September 27, 2023: This meeting was held to discuss an August 24, 2023, a letter from Caltrans to Metro and SHPO. In the letter, Caltrans stated that it is the opinion of Caltrans District 7 that the Project does not meet the SOI Standards and will therefore cause an adverse effect under Section 106 and a significant impact under CEQA. During the meeting, Metro provided a presentation and summarized changes made to the Project and cultural resources analysis resulting from consultation with Caltrans. Notable changes mentioned in the meeting included: avoiding the demolition of two bridges within the historic district, review of the LRT bridge and infill station to SOI Standards, modifying the design of the replacement freight bridge from 2 span to 4 span consistent with the existing bridge, replacing trees removed during construction at a 1:1 ratio, and providing a more robust analysis including for cumulative impacts. Metro also summarized consultation with SHPO. The presentation also compared effects of the WSAB Project and ExpressLanes Project and highlighted that the WSAB conclusions were consistent with those for the ExpressLanes Project. ▪ On October 6, 2023, Metro received a letter from Caltrans, which stated that "based on conversations between the project team and Caltrans, Metro has incorporated design changes that we feel meet the Secretary of the Interior's Standards for Rehabilitation." It enumerated several of the changes described earlier in this response. The letter further stated the following: "Caltrans appreciates the collaboration with Metro and does not object to your Finding of No Adverse Effect for the project, particularly with regard the Century Freeway-Transitway Historic District. As Caltrans has responsibilities for historical resources in their right of way under PRC 5024, we do request review of a Secretary of the Interior's Standards (SOIS) Action Plan as design of the project advances. A copy of the final Plan will be required before Caltrans can approve an encroachment permit for the project. In addition, Caltrans does not object to the conclusion in the Updated Report's CEQA section that the proposed project would not alter the historic district such that it would be materially impaired." In response to the above-summarized consultation with Caltrans, the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 2* was updated to provide a more thorough description of the historic district, relying on information and previous documentation compiled by Caltrans. Additionally, the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* (Sections 5.2.2.18 and 7.1.1.2) and Chapter 4, Section 4.14.3 of the Final EIS/EIR were updated to include a more robust effects/impacts assessment of the LPA on the historic district. Based on Caltrans's input, the following revisions were made to the analysis included in the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report:* ▪ The replacement freight bridge will be four spans and concrete, consistent with the current bridge (previously, a two-span bridge was proposed). ▪ The potential effects of the LPA on the I-105 are more thoroughly analyzed. ▪ The term "reconstruction" has been removed from the analysis. ▪ The design of the proposed bridges is described in further detail. ▪ The analysis states that designs for the proposed new LRT bridge and Metro C Line station will undergo SOI Standards design review in accordance with Project Measure CR PM-1 (SOI Standards Design Review).

Comment ID	Response
	▪ The analysis indicates that landscaping removed by the LPA will be replaced at a 1:1 ratio and the number of trees potentially effected has been quantified. ▪ Potential cumulative impacts of the LPA and future projects are more thoroughly discussed in Section 5.3 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report.* ▪ The potential for substantial adverse change to the district as a result of the LPA has been more thoroughly considered, relying on the CEQA Guidelines and several documents compiled by Caltrans, including the ExpressLanes Finding of Effect, for guidance. The following is a summary of updated effects/impacts assessment for the district: The Project will not result in the material impairment and/or the adverse effect of the Century Freeway-Transitway Historic District. According to the Caltrans guidance, *A Historical Context and Methodology for Evaluating Trails, Roads, and Highways in California* (Caltrans 2016), alterations to any component of a historic road may impact its historic integrity and, therefore, also its historical resources eligibility. Although the Project will remove a character-defining underpass from the district, the Century Boulevard Underpass, this underpass constitutes less than 1 percent of the character-defining bridges within the district, 117 of which will remain following project implementation. Additionally, the elements proposed for construction within the district, the new LRT bridge and replacement freight bridge, would be of a scale and mass commensurate with the district. The superstructures of the new LRT bridge and replacement freight bridge will integrate a concrete relief consistent with the relief design currently present on character-defining bridges throughout the district. In addition, to support compliance with the SOI Standards, design of the new LRT bridge and new Metro C Line infill station will be reviewed by a professional who meets the SOI PQS in architectural history, history, or architecture (36 Code of Federal Regulations (CFR) Part 61) to confirm the designs remain consistent with the fundamental principles of the SOI Standards and any trees removed from the APE during construction of the Project will be replaced at a ratio of 1:1. The analysis presented in Section 5.2.2.18 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* and summarized in Chapter 4, Section 4.14.3 of the Final EIS/EIR indicates that the Project will result in no adverse effect in accordance with Section 106 and less than significant impacts pursuant to CEQA. Coordination with Caltrans will continue as the project design progresses.
SA-3-25	See response to comment SA-3-24. The analysis presented in Section 5.2.2 of the *West Santa Ana Branch Transit Corridor Project Revised Preliminary Cultural Resources Effects Report* (Appendix X of the Draft EIS/EIR) and summarized in Chapter 4, Section 4.14 of the Draft EIS/EIR assumed that three character-defining bridges in the APE would be demolished by the Project. However, since circulation of the Draft EIS/EIR, the Project has been refined and only one character-defining bridge (the Century Boulevard Underpass) will be demolished as a result of the Project. Although the Project will demolish one bridge and introduce several new visual elements into the district, these new elements will be designed in a manner compatible in massing, scale, and overall design with the district. Additionally, new elements such as soundwalls and the station platform are consistent with the district's transportation use and will be consistent in form and function with other such elements throughout the district. As noted in response to comment SA-3-24, taking into account comments received from Caltrans on the Draft EIS/EIR regarding potential effects/impacts to the historic district, the analysis presented in Section 5.2.2.18 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* has been updated to more fully describe potential effects to the historic district under Section 106. Additionally, a more robust analysis for CEQA was added to Section 7.1.1.2 of that report. Chapter 4, Sections 4.14 and 4.19.3.14 have also been updated to include a summary of the analysis contained in the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report*.

Comment ID	Response
SA-3-26	See response to comment SA-3-24. Information and analysis related to alternatives considered for the Project were presented in Chapter 2, Section 2.4.4.1 of the Draft EIS/EIR. As the analysis presented in the *West Santa Ana Branch Transit Corridor Project Revised Preliminary Cultural Resources Effects Report* (Appendix X of the Draft EIS/EIR) indicated that the Project will result in no adverse effect in accordance with Section 106 and less than significant impacts pursuant to CEQA, a property-specific alternatives analysis was not included in the report. However, the updated analysis presented in the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* has been updated to include information related to the alternatives considered for the Project in support of the analysis of potential impacts in accordance with CEQA.
SA-3-27	See responses to comments SA-3-24 and SA-3-25. The term "reconstruction" has been removed from the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* and Final EIS/EIR. As indicated by the updated analysis, the removal and replacement of the Century Boulevard Underpass are necessary to accommodate both the freight rail line and the Project's LRT tracks within the existing ROW while reducing displacement. The Project will remove the existing Century Boulevard Underpass and replace it with two new overcrossings: a new LRT bridge will accommodate the project alignment and a replacement freight bridge will accommodate the UPRR freight rail line. The new LRT and replacement freight bridges will be generally consistent in their scale and massing with the other character-defining bridges throughout the district and will be sited in the approximate location of the current Century Boulevard Underpass. Additionally, in compliance with Project Measure CR PM-1 (SOI Standards Design Review), design of the new LRT bridge will be reviewed by a professional who meets the SOI PQS in architectural history, history, or architecture (36 CFR Part 61) to confirm that its designs remain consistent with SOI Standards and guidelines for Rehabilitation as it advances.
SA-3-28	See response to comment SA-3-24. The analysis presented in Section 5.2.2.18 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* and summarized in Chapter 4, Section 4.14.3 of the Final EIS/EIR has been updated to include additional detail related the designs of the proposed new LRT and replacement freight bridges. The width of the new LRT bridge will be approximately 46 feet, and the adjacently located replacement freight bridge will be up to 35 feet wide.
SA-3-29	See response to comment SA-3-24. The new LRT and freight bridges will be located immediately adjacent to one another and will read as a singular visual element. Although Metro disagrees with the assertion that the rhythm of the bridges would not be retained, in response to Caltrans' comments, the updated analysis in the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* no longer states that the rhythm of bridges would be retained. Rather, it states that the deviation in one area will not result in the significant alteration or interruption of the overall rhythm of overcrossings throughout the district. Additionally, the analysis presented in the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* has been updated to directly refer to information presented in Caltrans' Finding of Effect-Interstate 105 ExpressLanes Project-Cities of El Segundo, Los Angeles, Inglewood, Hawthorne, Lynwood, Paramount, South Gate, Downey and Norwalk and Unincorporated Los Angeles County (Lennox, Athens and Willowbrook)-Los Angeles, County, California, which states that none of the character-defining bridges proposed for alteration by the ExpressLanes Project "...is separately significant." Additionally, Caltrans' report states that "none of the bridges proposed for alteration is significant for its aesthetic or engineering qualities; that significance lies in their direct association to the larger linear resource which is important for the linked ITS system, the integral high-occupancy vehicle lanes, the concurrently constructed light rail line and ten light rail stations" (Caltrans 2020).

Comment ID	Response
SA-3-30	See response to comment SA-3-24. The analysis presented in Section 5.2.2.18 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* and summarized in Chapter 4, Section 4.14.3 of the Final EIS/EIR has been updated to include additional detail related the design of the proposed replacement freight bridge. The analysis now indicates that the replacement freight bridge will be a four-span, cast-in-place, prestressed concrete box girder structure up to 35 feet wide. The new freight bridge will be 444 feet long with a 9-foot depth of the box girder, with an additional 2-foot, 6-inch depth of the bridge deck to top of rail. The new freight bridge will have a 24-foot minimal vertical clearance from the bottom of the structure to the roadway below. The total vertical length from the roadway inclusive of the bridge deck and box girder will be a minimum of 35 feet, 6 inches. The new freight bridge will have a 22-foot, 2-inch minimum vertical clearance from the bottom of the structure to the C Line below the bridge. The total vertical length from the C Line, inclusive of the bridge deck and box girder, will be a minimum of 33 feet, 8 inches. In addition to the integration of the concrete relief, the analysis now notes that the structure will be consistent in its overall scale and massing with other bridges throughout the district, including the proposed new LRT bridge, and that its deck will be situated slightly below that of the adjacent new LRT bridge.
SA-3-31	See responses to comments SA-3-24 and SA-3-30. The analysis presented in Section 5.2.2.18 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* and summarized in Chapter 4, Section 4.14.3 of the Final EIS/EIR has been updated to include additional detail related to the design of the replacement freight bridge. It states that the replacement freight bridge will be constructed to the immediate west of the new LRT bridge and will be a four-span, cast-in-place, prestressed concrete box girder structure up to 35 feet wide. It states further that the utilitarian structure will be consistent in its overall scale and massing with other bridges throughout the district, including the proposed new LRT bridge, and that its deck will be situated slightly below that of the adjacent, new LRT bridge. It notes that additionally, the bridge railing will feature a decorative relief to match the relief present on character-defining bridges throughout the district. The analysis additionally acknowledges that its design is largely dependent on the requirements of the UPRR. The design presented and analyzed in the Final EIS/EIR and supporting reports accurately depict the Project as proposed.
SA-3-32	See response to comment SA-3-24. The analysis presented in Section 5.2.2.18 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* and summarized in Chapter 4, Section 4.14.3 of the Final EIS/EIR has been updated to include additional detail related to the designs of the new infill Metro C Line station and associated vertical circulation elements. The analysis now indicates that to support compliance with the SOI Standards, Project Measure CR PM-1 (SOI Standards Design Review) will be implemented. Accordingly, as it advances, design of the new infill Metro C Line station will be reviewed and approved by a professional who meets the SOI PQS in architectural history, history, or architecture to confirm that it remains consistent with the SOI Standards and guidelines for Rehabilitation.

Comment ID	Response
SA-3-33	The cumulative impact analysis included in Section 5.3 of the *West Santa Ana Branch Transit Corridor Project Revised Preliminary Cultural Resources Effects Report* (Appendix X of the Draft EIS/EIR) has been updated in Section 5.3 of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* to address the projects noted by Caltrans. The updated analysis considered seven reasonably foreseeable future projects located within or proximate to the historic district. Based on the information currently available about each of the projects, the analysis concluded that the combined effects of these projects and the WSAB Project will not have a cumulatively significant impact on the district. The revised cumulative impact analysis was shared with Caltrans in July 2023.
SA-3-34	In a letter dated October 26, 2021, FTA acknowledged Caltrans as a cooperating agency. Refer to Appendix B of the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report*. Additionally, the Abstract of the Final EIS/EIR identifies Caltrans as a cooperating agency and Chapter 7 of the Final EIS/EIR identifies Caltrans as a cooperating agency and responsible agency.
SA-3-35	The effects analysis for the Century Freeway-Transitway Historic District is presented in the *West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report* and the *West Santa Ana Branch Transit Corridor Project Final Section 4(f) and Section 6(f) Evaluation* and summarized in Chapter 5 of the Final EIS/EIR. As documented in Chapter 7, Section 7.10 of the Final EIS/EIR, the preliminary effect determination of No Adverse Effect that was documented in Chapter 4, Table 4.14.2 of the Draft EIS/EIR has been confirmed by FTA with concurrence of the SHPO on March 12, 2024. As documented in Chapter 5, Section 5.1.3.5 of the Draft EIS/EIR, a *de minimis* impact on a historic site means that the FTA has determined, in accordance with 36 CFR Part 800, that no historic property is affected by the Project, or the Project would have "no adverse effect" on the historic property in question. The preliminary *de minimis* finding from the Draft EIS/EIR has been confirmed for the Final EIS/EIR.
SA-3-36	Figure 2-4 in Chapter 2 of the Draft EIS/EIR identified the project alignment by alignment type (at-grade, aerial, or underground). The figure has been updated for the Final EIS/EIR to depict the LPA and better distinguish at-grade from aerial segments. Refer to Figure 2.5 in Chapter 2 of the Final EIS/EIR.
SA-3-37	See responses to comments SA-3-7 and SA-3-24. The LPA will cross Caltrans rights-of-way at I-710, I-105, SR-91, and I-605. An aerial structure is proposed at I-105, and the LPA will cross under I-710, SR-91, and I-605. The LPA will follow the Metro Rail Design Criteria or equivalent, the *West Santa Ana Branch Transit Corridor Urban Design Report* and the *West Santa Ana Branch Transit Corridor Project Urban Design Guide*. Caltrans will have the opportunity to review the design of the proposed structures within its right-of-way. Aesthetic treatment will not be provided where the alignment will cross under the I-710, SR-91, and I-605 freeways because the rail rights-of-way will not be visible within the Caltrans right-of-way in these areas.
SA-3-38	Vegetation outside of the project work limits will remain in place. Vegetation within the work limits will be replaced where there is sufficient room and will not conflict with the project components, such as railroad tracks. Landscaping and irrigation will follow the Metro Rail Design Criteria or equivalent criteria, the *West Santa Ana Branch Transit Corridor Project Urban Design Report* and the *West Santa Ana Branch Transit Corridor Project Urban Design Guide*. Trees removed within the historic district will be replaced at a 1:1 ratio. Design plans for project features within Caltrans right-of-way will be provided to Caltrans for review as design advances.

Comment ID	Response
SA-3-39	No soundwalls are proposed on the aerial structures within Caltrans right-of-way at I-105. Transparent soundwalls will be situated at the new infill station in the median of I-105. The I-105/C Line Station Plans, included in Appendix B of the Final EIS/EIR, show the locations of the soundwalls at the station (see Sheet A6-201). Caltrans will have the opportunity to review the design of these soundwalls. No soundwalls are proposed at other Caltrans rights-of-way (i.e., I-710, SR-91, and I-605) as the alignment will cross under these freeways and soundwalls are not required.
SA-3-40	Chapter 4, Section 4.11.3 of the Draft EIS/EIR and Section 5.7 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report* (previously Appendix T of the Draft EIS/EIR) were updated to include discussion of Caltrans facilities. Changes to drainage conditions within Caltrans rights-of-way due to construction of a new rail alignment will be site specific and dependent on the type of construction at each site. Section 4.11.1.1 under the subheading "State" was updated to reflect the Project will comply with the Caltrans Statewide Stormwater Permit. Section 4.11.3.1 was updated to clarify that project design features will meet Caltrans Stormwater Management Plan requirements. Low impact development design features would be implemented in compliance with Caltrans Stormwater Management Plan requirements and design standards to avoid and minimize impacts to water resources. Specific stormwater best management practices would be determined during the final design phase. Metro is committed to implementing these design features, which would ensure the project improvements within Caltrans rights-of-way would not result in adverse effects to water quality. Therefore, additional mitigation would not be required.
SA-3-41	Chapter 7 of the Final EIS/EIR has been updated to reflect changes to agency status since the Draft EIS/EIR. Caltrans is identified as a cooperating agency in Section 7.2.2 of the Final EIS/EIR.

California Highway Patrol

From: Saunders, Joseph@CHP <JCSaunders@chp.ca.gov>
Sent: Friday, September 10, 2021 11:10:26 AM
To: Khanna, Meghna <KhannaM@metro.net>; AVL <AVL@metro.net>
Cc: state.clearinghouse@opr.ca.gov <state.clearinghouse@opr.ca.gov>; Enciso, Blanca@CHP <Blanca.Enciso@chp.ca.gov>; Nunez, Jose@CHP <JONunez@chp.ca.gov>
Subject: 063 – BE – Environmental Document Review – SCH #2017061007 - Due to Lead Agency by 09/28/2021

Good Morning,

No impact to any Southern Division Area local operations and/or public safety by SCH# 2017061007 was identified.

SA-1-1

Thank you,

Joseph Saunders, Sergeant
Southern Division
Staff Services
411 N. Central Avenue, suite 410
Glendale, CA 91203
(818) 240-8200
(818) 240-1496 (fax)
Email: jcsaunders@chp.ca.gov

From: CHP-EIR <EIR@chp.ca.gov>
Sent: Tuesday, August 24, 2021 2:37 PM
To: Nunez, Jose@CHP <JONunez@chp.ca.gov>
Cc: Enciso, Blanca@CHP <Blanca.Enciso@chp.ca.gov>
Subject: 063 – BE – Environmental Document Review – SCH #2017061007 - Due to Lead Agency by 09/28/2021

Good afternoon,

Special Projects Section (SPS) recently received the referenced Notice of Environmental Impact document from the State Clearinghouse (SCH) outlined in the following Web site:

https://ceqanet.opr.ca.gov/2017061007/3

Due to the project's geographical proximity to Southern Division, please use the attached checklist to assess its potential impact to local Area/Section operations and public safety. If impact is determined, responses should be e-mailed directly to **Los Angeles County Metropolitan Transportation Authority (Lead Agency)** with cc to SCH, respective Division, and myself.

Please feel free to e-mail me if you have any questions.

Thank you!

Kind regards,

Blanca Enciso
Special Projects Section- 063
Transportation Planning Unit
California Highway Patrol
Office: (916) 843-3365

Memorandum

Date: August 20, 2021

To: Southern Division

From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**
Special Projects Section

File No.: 063.A10212.A18109.Noc.Doc

Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE
SCH# 2017061007

Special Projects Section (SPS) recently received the referenced "Notice of Completion" environmental impact document from the State Clearinghouse (SCH).

Please use the attached checklist to assess its potential impact to local Area operations and public safety. If it is determined that departmental input is advisable, your written comments referencing the above SCH number must be sent to the lead agency and emailed to state.clearinghouse@opr.ca.gov. Your written comments must be received by SCH no later than **September 28, 2021**. For reference, additional information can be found in General Order 41.2, Environmental Impact Documents.

For project tracking purposes, SPS must be notified of the assessment of the project (including negative reports). Please email a copy of the response to EIR@chp.ca.gov. For questions or concerns, please contact Blanca Enciso at (916) 843-3370.

L. NARVAEZ, SSM III
Commander

Attachments: Checklist
Project File

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #2017061007

Project Title: West Santa Ana Branch Transit Corridor Project

Lead Agency: Los Angeles County Metropolitan Transportation Authority
Contact Person: Meghna Khanna
Mailing Address: One Gateway Plaza, MS: 99-22-7
Phone: 213-922-3931
City: Los Angeles Zip: 90012
County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: _____
Cross Streets: _____ Zip Code: _____
Longitude/Latitude (degrees, minutes and seconds): ____° ____′ ____″ N / ____° ____′ ____″ W Total Acres: _____
Assessor's Parcel No.: _____ Section: _____ Twp.: _____ Range: _____ Base: _____
Within 2 Miles: State Hwy #: 710, 5, 60,10, 101,605, 91 Waterways: LA River, San Gabriel River, Rio Hondo Channel
Airports: _____ Railways: _____ Schools: _____

Document Type:

CEQA: ☐ NOP ☒ Draft EIR NEPA: ☐ NOI Other: ☐ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document
☐ Neg Dec (Prior SCH No.) _____ ☒ Draft EIS ☐ Other: _____
☐ Mit Neg Dec Other: _____ ☐ FONSI

Local Action Type:

☐ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, etc.) ☐ Other: _____

Development Type:

☐ Residential: Units _____ Acres _____
☐ Office: Sq.ft. _____ Acres _____ Employees _____
☐ Commercial: Sq.ft. _____ Acres _____ Employees _____
☐ Industrial: Sq.ft. _____ Acres _____ Employees _____
☐ Educational: _____
☐ Recreational: _____
☐ Water Facilities: Type _____ MGD _____
☒ Transportation: Type Light Rail Transit
☐ Mining: Mineral _____
☐ Power: Type _____ MW _____
☐ Waste Treatment: Type _____ MGD _____
☐ Hazardous Waste: Type _____
☐ Other: _____

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☒ Fiscal ☒ Recreation/Parks ☐ Vegetation
☐ Agricultural Land ☒ Flood Plain/Flooding ☒ Schools/Universities ☒ Water Quality
☒ Air Quality ☐ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☐ Sewer Capacity ☐ Wetland/Riparian
☒ Biological Resources ☐ Minerals ☒ Soil Erosion/Compaction/Grading ☒ Growth Inducement
☐ Coastal Zone ☒ Noise ☒ Solid Waste ☒ Land Use
☒ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☒ Cumulative Effects
☒ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☐ Other: _____

Present Land Use/Zoning/General Plan Designation:

Project Description: *(please use a separate page if necessary)*
LACMTA proposes to implement a project that would extend a new light rail line from four possible northern termini in downtown Los Angeles through southeast Los Angeles County to a southern terminus in the City of Artesia. Alternatives studied include a No Build and four Build Alternatives: Alternative 1: Los Angeles Union Station to Pioneer Station (19.3 miles; 11 stations) [Design Option 1: LA Union Station Metropolitan Water District & Design Option 2: Add Little Tokyo Station]; Alternative 2: 7th Street/Metro Center to Pioneer Station (19.3 miles; 12 stations); Alternative 3: Slauson/A Line (Blue) to Pioneer Station (Staff Preferred Alternative) (14.8 miles; 9 stations); Alternative 4: I-105/C Line (Green) to Pioneer Station (6.6 miles; 4 stations). Two maintenance and storage facility (MSF) site options are also under consideration at Paramount & Bellflower.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".
If you have already sent your document to the agency please denote that with an "S".

X	Air Resources Board	X	Office of Historic Preservation
	Boating & Waterways, Department of		Office of Public School Construction
	California Emergency Management Agency	X	Parks & Recreation, Department of
	California Highway Patrol		Pesticide Regulation, Department of
X	Caltrans District #7	X	Public Utilities Commission
	Caltrans Division of Aeronautics	X	Regional WQCB #4
X	Caltrans Planning		Resources Agency
	Central Valley Flood Protection Board		Resources Recycling and Recovery, Department of
	Coachella Valley Mtns. Conservancy		S.F. Bay Conservation & Development Comm.
	Coastal Commission		San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
	Colorado River Board		San Joaquin River Conservancy
	Conservation, Department of		Santa Monica Mtns. Conservancy
	Corrections, Department of	X	State Lands Commission
	Delta Protection Commission		SWRCB: Clean Water Grants
	Education, Department of		SWRCB: Water Quality
	Energy Commission		SWRCB: Water Rights
X	Fish & Game Region #5		Tahoe Regional Planning Agency
	Food & Agriculture, Department of	X	Toxic Substances Control, Department of
	Forestry and Fire Protection, Department of	X	Water Resources, Department of
	General Services, Department of		
	Health Services, Department of		Other:
	Housing & Community Development		Other:
X	Native American Heritage Commission		

Local Public Review Period (to be filled in by lead agency)

Starting Date 7/30/21 Ending Date 9/13/21

Lead Agency (Complete if applicable):

Consulting Firm: LA County Metro. Trans. Authority
Address: One Gateway Plaza, Mail Stop: 99-22-7
City/State/Zip: Los Angeles, CA 90012
Contact: Meghna Khanna
Phone: 213-922-3931

Applicant: LA County Metropolitan Transportation Authority
Address: One Gateway Plaza, Mail Stop: 99-22-7
City/State/Zip: Los Angeles, CA 90012
Phone: 213-922-3931

Signature of Lead Agency Representative: *Meghna Khanna* **Date:** 07/27/21

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

ENVIRONMENTAL IMPACT REPORT
EVALUATION/RESPONSE CHECKLIST
FOR AREA/SECTION

Reference: General Order 41.2

	Action	Reference GO 41.2
☐	Review memorandum for the due date(s).	
☐	Determine if the proposed project might impact local operations and/or public safety. Examples include: housing developments, large commercial projects, large recreational developments or expansions, landfill or quarry operations, hazardous materials storage and/or dump sites, highway construction/improvement projects, new schools, airport improvements, annexations/incorporations, off-highway vehicle facilities, and Indian gaming facilities.	Page 5
☐	Review environmental impact documents to identify issues or concerns with possible impact to departmental operations (i.e., increased response times, enforcement, emergency services, service calls, telecommunications, public safety).	
	Responses	
☐	If comments are advisable:	
☐	Correspondence should focus primarily on traffic safety, congestion, or other impacts to the CHP's mission; however, **Areas shall not indicate to the lead agency that additional personnel, facilities, vehicles, etc., are a means to mitigate departmental service issues**.	Page 7
☐	Ensure the State Clearinghouse number (SCH#) is included in all correspondence.	
☐	Comments shall be provided directly to the lead agency and emailed to State Clearinghouse at state.clearinghouse@opr.ca.gov no later than the designated due date. Provide a copy to Special Projects Section (SPS) via electronic mail (e-mail).	
	For project tracking purposes, SPS must be notified of Area/Section's assessment of the project. After mailing your comments to the SCH or lead agency, send a scanned copy via e-mail to SPS.	
☐	If no impact is determined:	
☐	Via e-mail, please respond "no impact to _____ Area's local operations and/or public safety by SCH# _____ was identified," by the designated SCH due date to the SPS analyst listed on the Environmental Document Review and Response memorandum. Ensure the SCH# is included.	

California Highway Patrol – SA-1

Comment ID	Response
SA-1-1	The comment regarding no impact to California Highway Patrol operations has been noted.

California Public Utilities Commission

Greetings:Attached is the comment letter of the California Public Utilities Commission staff on the referencedDEIS/EIR for the West Santa Ana Branch Transit Corridor project.Daren Gilbert, Manager

SA-2-1

STATE OF CALIFORNIA Gavin Newsom, Governor

PUBLIC UTILITIES COMMISSION

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

September 23, 2021

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

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

Dear Ms. Khanna,

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) and rail transit projects in California. All rail fixed guideway systems are subject to the Commission's Safety Oversight Program requirements. Safety Certification Plan (SCP) approval and Safety Certification Verification Report (SCVR) approval is 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 power on 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 received a copy of the *Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR)* from the Los Angeles County Metropolitan Transportation Authority (Metro), who is the lead agency for the proposed West Santa Ana Branch Transit Corridor Project (WSAB Project).

SA-2-2

Commission staff has been coordinating with Metro on crossing design requirements, and we welcome the opportunity to formally comment on the DEIS/EIR. According to the DEIS/EIR, the WSAB Project is a light rail transit (LRT) project that would extend from four possible northern termini in downtown Los Angeles through southeast Los Angeles County to a southern terminus (Pioneer Station) in the City of Artesia. The WSAB Project would transport riders from the downtown Los Angeles area to the Gateway Cities subregion of Los Angeles County. The region to be served includes 20 cities: Los Angeles, Vernon, Maywood, Huntington Park, Commerce, Bell, Cudahy, Bell Gardens, South Gate, Lynwood, Compton, Downey, Paramount, Bellflower, Long Beach, Lakewood, Norwalk, Artesia, Cerritos, and Hawaiian Gardens, as well as portions of unincorporated LA County. Alternatives studied include a No Build Alternative and four Build Alternatives, as follows:

- Alternative 1: Los Angeles Union Station to Pioneer Station
- Alternative 2: 7th Street/Metro Center to Pioneer Station
- Alternative 3: Slauson A (Blue) Line to Pioneer Station (Staff Preferred Alternative)
- Alternative 4: I-105/C (Green) Line to Pioneer Station

The WSAB Project described in the DEIS/EIR is 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 public crossings. These are available on the CPUC web site. www.cpuc.ca.gov

SA-2-3

The design criteria of the proposed ITC Project must comply with Commission General Orders (GOs), such as:

- GO 26-D, Clearances on Railroads and Street Railroads as to Side and Overhead Structures, Parallel Tracks and Crossings,
- GO 72-B, Construction and Maintenance of Crossings – Standard Types of Pavement Construction at Railroad Grade Crossings (if any),
- GO 75-D, Warning Devices for At-Grade Railroad Crossings (if any),
- GO 88-B, Rules for Altering Public Highway-Rail Crossings (if any),
- GO 95, Overhead Electric Line Construction (if catenary is used),
- GO 128, Construction of Underground Electric Supply and Communication Systems,
- GO 143-B, Design, Construction and Operation Safety Rules and Regulations Governing
- Light-Rail Transit, and
- GO 164-E, Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems

SA-2-4

The project must ensure compliance with federal regulations including:

- 49 CFR Part 674, State Safety Oversight

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

SA-2-5

The DEIS/EIR identifies significant and adverse impacts to traffic operations due to construction of crossings at grade or street level. The impacts consist of roadway intersections where operations deteriorate because LRT tracks are constructed either through or adjacent to the intersections, and vehicle queues build up when crossing gates are down. Alternatives 1-3 would impact 20 intersections, while Alternative 4 would impact 7 intersections. Alternatives 1-3 would continue to have adverse impacts at 12 intersections, after implementing mitigation measures such as signalization strategies to minimize traffic queuing impacts and intersection modifications at specific locations.

SA-2-6

The WSAB Project would also cause noise impacts at sensitive land uses due to LRT pass-by operations, ancillary facilities, and relocated freight train operations even after implementation of mitigation measures such as sound walls, low-impact frogs, wheel squeal noise monitoring, crossing signal bells, gate-down-bell stop variance, and Traction Power Sub-Station (TPSS) noise reduction. Approximately 120 – 225 sensitive land uses would remain adversely impacted. SA-2-7

In addition, the WSAB Project would cause ground borne vibration that would exceed Federal Transit Administration (FTA) impact criteria at a varying number of sensitive land uses. Identified mitigation measures such as ballast mat or resilient rail fasteners, and low-impact frogs would not eliminate the number of sensitive land uses impacted. Depending on the Build Alternative selected, significant and unavoidable vibration impacts would remain at between 11-14 sensitive land uses. SA-2-8

Finally, the DEIS/EIR identifies that the WSAB Project would have significant cumulative impacts. Specifically, during operation, transportation, land use, noise, vibration, parklands, and community facilities would result in significant cumulative impacts that would be cumulatively considerable. SA-2-9

The four Build Alternatives studied contain segments proposed to operate at-grade or street level. Alternatives 1 -3 contain approximately 12 miles of at-grade operations with 31 proposed crossings, while Alternative 4 contains an at-grade operational segment of 5.6 miles with 11 proposed crossings. At-grade operations, as detailed in the DEIS/EIR, would disrupt the heavily used roadway network within the densely populated communities of the Gateway Cities subregion of Los Angeles County, as well portions of unincorporated Los Angeles County. Furthermore, the WSAB Project results in significant and adverse impacts to traffic operations, noise and ground borne impacts to sensitive land uses, and significant cumulative impacts due to its operation. Therefore, Commission staff recommend Metro further evaluate additional grade separations and/or elimination and consolidation of proposed at-grade crossing locations. Commission staff will not support at-grade designs at crossing locations where significant and adverse impacts cannot be mitigated. SA-2-10

We understand that this is a complex and challenging project with funding, design, and environmental approval considerations for Metro. Assuming the project advances in some form, the Commission will need to provide applicable regulatory oversight for the WSAB Project. Oversight activities include approval of the WSAB Project SCP and SCVR, selected document reviews, sampling inspections, participation in fire-life safety and safety certification related meetings, and pre-revenue testing observations. Commission staff will provide the WSAB Project team a project-specific Safety and Security Certification Oversight Plan (SSCOP) after Commission approval of WSAB Project's SCP. The SSCOP will detail Commission staff's oversight process and activities prior to the Project's proposed revenue service date.

We encourage early coordination between Commission staff and Metro personnel in order to provide consultation on proposed design and engineering of the WSAB Project prior to Metro filing applications seeking Commission authorization to construct. SA-2-11

Thank you for the opportunity to comment on the Metro's DEIR for the WSAB Project. We look forward to working with Metro. Please feel free to contact me at (916) 928-6858 or daren.gilbert@cpuc.ca.gov or contact our lead staff on this project: Madeline Ocampo at (213) 503-5243 or madeline.ocampo@cpuc.ca.gov for transit safety matters, and Jose Pereyra at (213) 576-7083 or jose.pereyra@cpuc.ca.gov for crossing matters.

Sincerely,

Daren Gilbert, Manager
Rail Transit Safety Branch
Rail Safety Division

cc: State Clearinghouse
Roger Clugston, Director, Rail Safety Division, CPUC
Anton Garabetian, Manager, RCEB, CPUC
Stephen Artus, Program and Project Supervisor, RTSB, CPUC
Matthew Bond, Program and Project Supervisor – Southern California, RCEB, CPUC
Ainsley Kung, Senior Utilities Engineer Supervisor, RTSB, CPUC
Madeline Ocampo, Utilities Engineer, RTSB, CPUC
Jose Pereyra, Utilities Engineer, RCEB, CPUC

California Public Utilities Commission – SA-2

Comment ID	Response
SA-2-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
SA-2-2	Metro recognizes CPUC's authority regarding highway-rail crossing safety.
SA-2-3	Metro will comply with the applicable CPUC rules and regulations as design advances and through construction.
SA-2-4	Metro will comply with the applicable CPUC General Orders as design advances and through construction.
SA-2-5	Metro will comply with 49 CFR Part 674 as applicable.
SA-2-6	The traffic analysis has been updated since circulation of the Draft EIS/EIR. Specifically, as a result of coordination with the City of Huntington Park, the Malabar and Arbutus at-grade crossings will be closed to vehicular traffic across the tracks. Additionally, the Draft EIS/EIR identified the closure of the Albany Street and Rugby Avenue at-grade crossings; these crossings will now remain open. The locations of at-grade train crossing closures in the City of Huntington Park are identified in Project Measure TR PM-3 (Randolph Street Intersection Modifications) in Chapter 3, Section 3.5.1 of the Final EIS/EIR. Additionally, left-turn restrictions have been identified at several intersections in the City of Huntington Park and are identified in Project Measure TR PM-4 (Randolph Street Lane Reduction) in Section 3.5.1. Consistent with the Draft EIS/EIR, Project Measure TR PM-1 (Pre-signals and Queue-cutter signals) will also be implemented to prevent vehicles from queueing onto the railroad tracks. The updated traffic analysis is presented in Chapter 3, Section 3.4.1 of the Final EIS/EIR. The LPA (previously evaluated as Alternative 3 in the Draft EIS/EIR) will result in adverse impacts at 19 intersections based on changes in level-of-service. Mitigation has been identified at intersections to minimize impacts to the extent feasible and includes adding left-turn lane(s), extending existing left-turn lane(s), adding a through lane, and/or converting stop-controlled intersections to signal-controlled. With implementation of mitigation, adverse effects will be fully mitigated in both peak periods at seven intersections. For the 12 locations where adverse effects will remain during one or both peak periods, 8 are along Randolph Street. Implementation of the Locally Preferred Alternative (LPA) requires reducing the number of travel lanes on Randolph Street, which combined with train crossing activity, will result in adverse impacts at intersections. Additional mitigation is not feasible as right-of-way acquisitions would be required to accommodate additional travel lanes. Similarly, right-of-way acquisitions would be required to minimize adverse effects at the two intersections along Gage Avenue and the two intersections along Florence Avenue.

Comment ID	Response
SA-2-7	In response to comments received from, and coordination with, CPUC, additional analysis has been prepared since the Draft EIS/EIR to identify possible additional noise reduction measures, including: ▪ Taller soundwall heights to further reduce operational light rail transit (LRT) and relocated freight noise per Mitigation Measure NOI-1 (Soundwalls) and NOI-5 (Freight Track Relocation Soundwalls). ▪ Extension of soundwalls to the pedestrian crossings to maximize noise-reduction benefits for sensitive receptors near at-grade crossings. ▪ Implementation of Project Measures NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop Variance), which will reduce noise related to at-grade crossings. The noise analysis presented in Sections 4.7.3 and 4.7.4 of the Final EIS/EIR incorporates additional analysis completed since the Draft EIS/EIR and identifies additional noise reductions. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR). The updates to the noise methodology, including implementation of Project Measures NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop Variance) and updates to Mitigation Measures NOI-1 through NOI-5, resulted in an overall decrease in the number of moderate and severe impacts compared to the Draft EIS/EIR. Specifically, the number of LRT pass-by noise impacts after mitigation was reduced from 101 moderate and 59 severe impacts identified in the Draft EIS/EIR to 31 moderate and 4 severe impacts. Regarding relocated freight tracks, the number of relocated freight track noise impacts after mitigation was reduced from 37 moderate and 11 severe impacts identified in the Draft EIS/EIR to 38 moderate and 1 severe impacts for the LPA. See also response to comment SA-2-10 for additional information regarding updates to the noise analysis.
SA-2-8	Metro's experience with mitigating groundborne vibration has been successful with the use of different trackwork designs such as ballast mats, resilient rail fasteners, and low impact frogs. The Final EIS/EIR identifies the location of sensitive land uses that could be affected by system operation. At those identified locations, a more detailed assessment will be conducted as design advances to confirm if the mitigation measures identified in Mitigation Measures VIB-1 (Ballast Mat or Resilient Rail Fasteners) and VIB-2 (Low Impact Frogs) are needed to reduce vibration levels at affected vibration-sensitive locations and establish site-specific design parameters based on local geotechnical conditions. As shown in Table 4.7.10 of Chapter 4, Section 4.7.4 of the Final EIS/EIR, with mitigation, 2 vibration-sensitive clusters will still experience LRT vibration impacts in the range of 1 VdB to 2 VdB greater than the impact criteria.

Comment ID	Response
SA-2-9	To satisfy the requirements of the National Environmental Policy Act, the analysis of cumulative effects considers the potential for effects that are later in time or farther removed in distance, in accordance with Council on Environmental Quality regulations (40 CFR Sections 1500 – 1508), which define effects as "changes to the human environment from the proposed action or alternatives that are reasonably foreseeable...and may include effects that are later in time or farther removed in distance from the proposed action or alternatives. Section 15355 of the California Environmental Quality Act (CEQA) Guidelines defines cumulative impacts as "two or more individual impacts which, when considered together, are considerable or that compound or increase other environmental impacts." CEQA Guidelines, Section 15064(h)(1)) states, "'Cumulatively considerable' means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." Chapter 4, Sections 4.21.3 and 4.21.4 of the Draft EIS/EIR concluded that impacts related to operational and construction transportation impacts, operational land use effects with respect to planned Class I bicycle paths, operational and construction noise impacts to sensitive receptors, and operational vibration impacts would be cumulatively considerable. Sections 4.21.3 and 4.21.4 of the Draft EIS/EIR concluded that the Project would not result in significant cumulative parklands and community facility effects during operations or construction.
SA-2-10	As noted in response to comment SA-2-7 in response to CPUC comments, Metro completed additional analysis and included additional project measures, such as bell shrouds and bell stop variances, that reduced the number and severity of noise impacts near grade crossings. Metro met with CPUC on March 7, 2023, to discuss the updated noise analysis and results. CPUC was provided a summary of the updated noise impacts and analysis assumptions at at-grade crossing for further review. On April 4, 2023, CPUC notified Metro via email that it had no further comments on the noise analysis. This analysis was incorporated into Chapter 4, Section 4.7 of the Final EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report*. The project measures (NOI PM-1, Crossing Signal Bells and NOI PM-2, Gate-Down-Bell-Stop Variance) have been coordinated with CPUC but remain subject to CPUC's final approval. Based on the updated analysis and coordination with CPUC, no additional grade separations are proposed in the Final EIS/EIR. Refer to the response to comment SA-2-6 regarding updates to grade crossing closures/openings and left-turn restrictions since the Draft EIS/EIR.
SA-2-11	Metro has coordinated with CPUC at various points throughout development of the Draft EIS/EIR and continued coordination after circulation of the Draft EIS/EIR to address comments received from CPUC and discuss design changes. Specifically, meetings occurred on May 17, 2022, August 15, 2022, and March 7, 2023. Additionally, a meeting occurred with CPUC and the City of Artesia on November 9, 2022. Metro also held a series of meetings with CPUC, Union Pacific Railroad, the Ports of Long Beach and Los Angeles, and the City of Huntington Park in August and September 2023 regarding design at two at-grade crossings in the City of Huntington Park. Design modifications were made following those meetings. Metro looks forward to continued coordination with CPUC throughout the next phases of the design, field diagnostics, and construction process.

REGIONAL AGENCIES

RA-4

RA-4-1

Alameda Corridor Transportation Authority (Michael Leue)

ALAMEDA CORRIDOR TRANSPORTATION AUTHORITY

3760 KILROY AIRPORT WAY, SUITE 200, LONG BEACH, CA 90806 – (562) 247-7777 • FAX (562) 247-7090

September 28, 2021

Ms. Meghna Khanna
Project Manager
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza, M/S 99-22-4
Los Angeles, CA 900121

Subject: Alameda Corridor Transportation Authority Comments on Draft Environmental Impact Statement/Environmental Impact Report for Metro's West Santa Ana Branch Transit Corridor Project

Dear Ms. Khanna,

These comments are submitted by the Alameda Corridor Transportation Authority ("ACTA") in response to the Metropolitan Transportation Authority's ("Metro") Draft Environmental Impact Statement/Environmental Impact Report ("Draft EIS/EIR") for Metro's proposed West Santa Ana Branch Transit Corridor Project, a light rail transit line connecting downtown Los Angeles to southeast Los Angeles County (the "Metro Project" or "Project"). The Draft EIS/EIR proposes to utilize certain property under ACTA's operational jurisdiction, and these comments are submitted in response to the portions of the Metro Project impacting ACTA.

RA-4-2

ACTA is a Joint Powers Authority created by the Cities of Los Angeles and Long Beach, governed by a seven-member board consisting of representatives from the Cities of Los Angeles and Long Beach, the Ports of Los Angeles and Long Beach and the Los Angeles County Board of Supervisors. ACTA's Mission is to facilitate the movement of goods from the southern California Ports to local and nationwide goods distribution networks on a twenty-four hour, seven days a week operation via the Alameda Corridor rail system. In fulfillment of this Mission, ACTA manages and operates the Alameda Corridor, a 20-mile-long freight rail expressway between the Ports of Los Angeles and Long Beach to BNSF and UP railroad yards in the City of Commerce. In addition to this dedicated rail corridor, ACTA also has certain rights to operate freight rail over property owned jointly by the ports of Los Angeles and Long Beach, commonly referred to as the San Pedro Branch line. The Metro Project proposes to cross over the Alameda Corridor as well as utilize certain portions of the San Pedro Branch property.

1) The Metro Project proposes to cross over the Alameda Corridor at street level at Alameda Boulevard and Randolph Street.

If the final approved Metro Project requires one or more aerial crossings over the Alameda Corridor, Metro will need to obtain appropriate access rights from the ports of Los Angeles and Long Beach as joint owners of the Alameda Corridor property. If not already included, ACTA recommends that Metro discuss the proposed crossings as part of their on-going work with the two ports, in order to acquire all necessary rights-of-way for the Project. As a critical piece in the national goods movement infrastructure, it is imperative that the Alameda Corridor not be impacted structurally and remain operational before, during and after construction of the Metro Project. ACTA also recommends that Metro staff begin discussions with ACTA in order to obtain relevant engineering details on the Alameda Corridor, including as-built drawings at the proposed crossing points, to facilitate all planning and engineering for the Project. RA-4-3

2) The Metro Project proposes to build, operate and maintain a separate track adjacent to the San Pedro Branch Line on an approximate six-mile-long right-of-way between Florence Avenue (In Huntington Park) and Rosecrans Avenue (in Paramount).

In addition to obtaining property for the main Alameda Corridor line, in 1994 the ports of Los Angeles and Long Beach purchased the San Pedro Branch Line and all associated rights-of-way from the predecessor to the Union Pacific Railroad ("UP"). The Metro Project proposes to utilize a six-mile right-of-way of the San Pedro Branch property between Florence Avenue and Rosecrans Avenue. Metro should be aware that pursuant to certain agreements, ACTA has rights to operate freight rail on the San Pedro Branch Line as an alternate route in the event that the Alameda Corridor becomes partially or fully blocked, or inoperable for any other reason. Moreover, in the event the San Pedro Branch is used as an alternative route for freight rail, UP and BNSF Railway Company, are required to pay Use Fees and Container Charges to ACTA for such use. For these reasons, it is critical that Metro ensure that the San Pedro Branch Line used for the Metro Project remain fully intact with no interference to freight operations or availability as an alternative Alameda Corridor route, both during the construction phase and operational phase of the Metro Project. RA-4-4

ACTA refers Metro to comments to be provided by the Port of Long Beach and the Port of Los Angeles in response to the Draft EIR/EIS. These comments will address additional areas of importance to operation of the Alameda Corridor including construction and operational safety of the Metro Project in relation to the freight rail operations. As mentioned above, there will also be right-of-way acquisition issues and on-going property management obligations that Metro will need to address.

Thank you for the opportunity to submit these comments. As you can see, there is a critical need for Metro to coordinate closely with ACTA and both Ports throughout the environmental review process as well as during design and construction to ensure the continued safe and efficient operation of the Alameda Corridor, a vitally important asset to the nation's economy.

RA-4-5

If you have questions, need additional information or to coordinate discussions as recommended above, please contact the undersigned at your convenience. ACTA looks forward to future close agency coordination to ensure Metro's success with the Project.

Sincerely,

Michael Leue, P.E.
Chief Executive Officer

cc: ACTA Board Members
Gene Seroka, POLA
Mario Cordero, POLB
Sara Bailiff, BNSF
Melissa Grosz, UPRR
Chuck Waddell, Cal Pacific
Kerry Cartwright, POLA
Carlo Luzzi, POLB

Alameda Corridor Transportation Authority – RA-4

Comment ID	Response
RA-4-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
RA-4-2	Thank you for your comment and interest in the Project.
RA-4-3	Consistent with the design in the Draft EIS/EIR, the Project will be located at-grade in the public street right-of-way in the center of Randolph Street when it crosses over the Alameda Corridor. Only minor curb modifications are proposed within the Alameda Corridor right-of-way. As-Builts for the existing Alameda Corridor aerial structure for Randolph Street have been reviewed and the bridge has been designed to accommodate the original Cooper E-80 loading and HS 25-44 Truck loading. The existing design does not require structural changes to the Alameda Corridor. Metro met with a representative of the Alameda Corridor Transportation Authority on April 27, 2023, to provide an update on the Project. Metro will continue to coordinate with the Alameda Corridor Transportation Authority as needed as design progresses.
RA-4-4	Freight operations along the San Pedro Corridor will not be affected by the Project. The freight alignment and storage tracks will be shifted to accommodate the Project's light rail transit tracks. Construction will be phased to provide continuous freight operations to the extent practicable.
RA-4-5	Metro continues to coordinate with partner jurisdictions and authorities.

Gateway Cities Council of Government

From: nmichali@sbcglobal.net <nmichali@sbcglobal.net>
Sent: Tuesday, September 28, 2021 4:13 PM
To: Khanna, Meghna <KhannaM@metro.net>
Subject: WSAB DEIS/EIR Review Comments from the WSAB City Manager TAC

Good afternoon Meghna,
Please find attached the review comments of the WSAB City Manager Technical Advisory (TAC) of the Gateway Cities Council of Government on the WSAB Project Draft Environment Impact Statement/Environment Impact Report.
A hard copy of these comments will be mailed as well.

Thank you for the opportunity to comment on this important step forward towards construction of the WSAB Project.
Nancy Michali

RA-2-1

Nancy Michali
WSAB City Manager Technical Advisory Committee Consultant
Gateway Cities Council of Governments
nmichali@sbcglobal.net | 805.707.3713
www.gatewaycog.org | Meet our Board Members

GATEWAY CITIES

September 28, 2021

Ms. Meghna Khanna
Project Manager
One Gateway Plaza, M/S 99-22-7
Los Angeles, CA 90012

Dear Ms. Khanna:

West Santa Ana Branch Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report

The West Santa Ana Branch City Manager Technical Advisory Committee (WSAB CM TAC) has reviewed the WSAB Transit Corridor Draft Environmental Impact Statement/Environment Impact Report (DEIS/EIR) document. We have prepared a list of WSAB Corridor-wide policy issues and project concerns for your consideration in the preparation of the Final EIS/EIR.

The DEIS/EIR document is comprehensive and provides a detailed understanding of the environmental and community benefits and impacts which may result from implementation of this much-needed rail project. We request more detail and attention in the Final EIS/EIR on two key project issues discussed below, and several WSAB Project Corridor-wide Issues and Concerns identified in attached materials. RA-2-2

Without further evaluation and the requested information being provided for in the Final EIS/EIR for decision-makers and future funding efforts, the following two Project concerns may result in increased challenges to successfully building a rail system in this unique Corridor, and possible adverse impacts to the Environmental Justice cities of the Gateway Cities Subregion as the WSAB Project proceeds into construction.

The first challenge concerns the Environmental Justice analysis. The WSAB Project has been identified as an "Environmental Justice" Project by Metro and the Federal Transit Administration – and the Gateway Cities portion of the project clearly qualifies as an Environmental Justice Corridor. A majority of the WSAB Corridor cities have median household incomes well below the County of Los Angeles average. In addition, the Corridor cities are densely populated with two cities – Huntington Park and Cudahy – having a population density per square mile just below that of New York City and almost RA-2-3

along with Pandemic-related impacts, clearly identify the Subregion's challenges. In addition, these financial constraints will negatively impact the ability of the cities of the Gateway Cities Subregion to provide their 3% Local Contribution funding, which should be reflected in the Economic/Fiscal analysis of the FEIS/EIR. RA-2-3

The WSAB Corridor has a mix of industrial and residential uses, often located adjacent to each other, creating a unique public and community environment. Active and once active railroad lines are threaded through the Corridor's communities. There is a significant amount of Goods Movement throughout the Corridor with trucks traveling from the Ports of Long Beach and Los Angeles on the south end to serve the BNSF and UP intermodal yards to the north – and serving the Corridor's businesses. The Gateway Cities was once was a major part of Los Angeles' manufacturing corridor running from Downtown Los Angeles to the Ports. Over the years, more than 100,000 manufacturing jobs have been lost in the Gateway Cities alone. Many of the Corridor's businesses are reinventing themselves and new small businesses have been started. It is a tough group of cities who continue to grow and survive through many economic cycles, including the latest brought on by the Pandemic, which severely impacted the businesses and related jobs in these communities. The Gateway Cities Subregion is a unique area with unique challenges, and yet the DEIS/EIR raises none of these issues – the environmental review reads like a study of any suburban area in Los Angeles County. If Metro is seeking, and the Subregion's agencies are supporting the WSAB Project as a priority for state and federal funding beyond regional funding, the case has not been made from an environmental justice perspective. The very real transportation, economic and community challenges that the Corridor faces are not identified and addressed. The impacts, such as taking 191 properties and displacing 65 businesses, should be addressed as the significant challenges that they will be for the Corridor's cities. The Final EIS/EIR needs to address and propose stronger and more proactive mitigation measures for these challenges. The cities and the Gateway Cities COG are ready to continue being strong partners in addressing this unique Corridor's with unique solutions. RA-2-4 RA-2-5

The second issue is in the Hazards and Hazardous Materials review section, the DEIS/EIR identifies 298 historic environmental concern sites in the Gateway Cities portion of the WSAB Corridor. This significant number of contaminated soil and related groundwater sites clearly represents the many years of heavy railroad and truck travel. Soil along the future WSAB Project right-of-way has been identified as highly contaminated, as has the groundwater in some areas, reflecting its many years of handling freight and passenger trains – more than 100 years of service. The WSAB light rail project will require reconfiguring the rail right-of-way from its current profile serving 1-2 tracks to accommodating a four-track configuration – two for light rail and two for freight rail service. Reconfiguration efforts from along Randolph Street south along the Harbor Subdivision and then along the former Pacific Electric right-of-way may require moving and handling of large amounts of right-of-way soil. The DEIS/EIR does not address this issue nor propose any mitigation measures for the proposed handling of contaminated soil during construction, nor contaminated groundwater during project construction and possibly permanently through many years of operation. Impacts during right-of-way reconfiguration may include: RA-2-6

- **Air Quality** and **Community/Neighborhood impacts** to adjacent residential neighborhoods, schools, parks, sensitive uses and businesses.
- **Traffic impacts** as haul trucks will be required for contaminated soil removal; the final destination for the contaminated soil and groundwater should be identified.
- **Water impacts** – if the water table is contaminated under the rail right-of-way, contaminated water removal, storing and filtering may have physical and health impacts to adjacent neighborhoods.

RA-2-6

We look forward to more detailed analysis, discussion and strengthened mitigation measures on these two issues for the Final EIS/EIR. These efforts will build a strong basis for funding this Environmental Justice Project, while addressing the scope of the project's impacts on environmental justice communities.

RA-2-7

We have identified additional issues that we request further information and discussion on, as summarized in an attachment and detailed review and comment table –

1. **WSAB Project Issues that Metro has addressed and successfully resolved with other cities on other Metro projects**, such as the Crenshaw-LAX, Expo Line Phase 2 and the Gold Line to Pasadena projects.
2. **Opportunities for the WSAB Corridor cities** to provide Metro with risk-preventative support efforts that will widen the type of allowable in-kind contributions.

RA-2-8

The WSAB City Manager TAC looks forward to continuing to work with Metro in successfully delivering the WSAB Project in a timely manner to support mobility, connectivity and the economic strength of our cities and communities.

Respectfully submitted,

John Moreno,
WSAB City Manager TAC Chair
City Manager
City of Paramount

Gilbert Livas,
WSAB City Manager TAC Co-Chair
City Manager
City of Downey

WSAB Project DEIS/EIR Corridor-wide Issues and Concerns

We request additional information on **WSAB Project Issues of concern to the Gateway Cities**. **The following issues are those that Metro has successfully addressed and resolved with other cities on other Metro projects**, such as the Crenshaw-LAX, Expo Line Phase 2 and the Gold Line to Pasadena projects. This information should be used to refine the WSAB Project mitigation measures. RA-2-9

- **Community Outreach Plan (COM-1)** mitigation measure identified in the DEIS/EIR addresses a wide range of issues, including temporary vehicle, freight, pedestrian and bicycle circulation to minimize impacts on businesses and residents, along with Circulation, Communities/Neighborhoods, Acquisitions/Displacements and Economic/Fiscal Impacts, Business Impacts and Safety/Security Impacts. We request additional information to understand the full set of issues identified and evaluated in this document, and how the strategies to address these issues were developed. It will be important for the WSAB Corridor cities to participate in development of viable strategies as we will be involved in implementing them. RA-2-10
- **Transportation/Parking and Circulation** – Understanding the planned handling of the loss of on-street parking; development of temporary parking and vehicular, pedestrian and bicycle circulation plans during Construction. RA-2-11
- **Property Acquisition/Residential Displacements –** Developing a proactive program to share assistance and compensation information with residents and businesses displaced by the Project. RA-2-12
- **Business Displacements and Economic/Fiscal Business Impacts** – Understanding assistance and compensation efforts, along with needed further analysis – are there really opportunities for businesses to relocate in their communities? Corridor's small businesses have been badly hurt by the Pandemic, and it is a key concern to the Gateway Cities to protect and successfully relocate businesses to be displaced. RA-2-13
- **Noise Impacts** – Understanding how Metro and other communities on other rail projects have successfully mitigated noise impacts, including possible soundwall solutions to mitigate the noise of trains, and past efforts to work with the California Public Utilities Commission (CPUC) to reduce decibel level requirements for train horns and crossing gate-down bells. RA-2-14
- **Securing Metro support** for cities seeking funding to modify bike and ACP plans impacted by the WSAB Project. RA-2-15

We request the opportunity to discuss **Opportunities for the WSAB Corridor cities** to provide Metro with risk-preventative support efforts, such as Mitigation Measures, that will widen the types of allowable in-kind contributions. RA-2-16

- **Work with Corridor cities** to make following improvements to streets, highways and signals systems that are under their jurisdiction, such as – RA-2-17
  - Implement intersection modifications at 20 intersections.
  - Develop and implement signalization strategies.
- With the projected significant increase in transit trips, recognize that in this densely-occupied Corridor with primarily suburban development pattern, the importance of local shuttles providing neighborhood access to rail stations for a wide range of passengers who cannot walk or bike to the station. RA-2-18

Gateway Cities Council of Government – RA-2

Comment ID	Response
RA-2-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
RA-2-2	The identified items are addressed individually where they appear in the attached materials and responses that follow.
RA-2-3	As part of the Project's Purpose and Need described in Chapter 1, Section 1.2 of the Draft EIS/EIR, Metro is dedicated to improving access for the densely populated neighborhoods, major employment centers, and other key regional destinations where future growth is forecasted to occur within the Study Area. The Project will also address mobility and access constraints faced by transit-dependent communities and environmental justice communities. See response CR-FIN-1 regarding the 3 percent match and response CR-EJ-1 regarding environmental justice communities.
RA-2-4	As discussed in Chapter 4, Section 4.22 of the Draft EIS/EIR, the Environmental Justice (EJ) Affected Area is defined as the U.S. Census block groups that are located within or intersect the area within 0.25 mile of the alignments, parking facilities, and maintenance and storage facility (MSF) site, and within 0.5 mile of the proposed stations. This Affected Area follows Federal Transit Administration (FTA) direction on EJ analysis and adequately describes the unique characteristics of the EJ Affected Areas of the Cities of Los Angeles (including the Central City North, Central City, and Southeast Los Angeles communities), Vernon, Huntington Park, Bell, Cudahy, South Gate, Downey, Paramount, Bellflower, Artesia, and Cerritos, and the unincorporated Florence-Firestone community of LA County, identified in the Draft EIS/EIR. Section 4.22.2.1 of the Draft EIS/EIR details the demographic and socioeconomic characteristics of each city. Metro is pursuing multiple avenues of funding to complete the Locally Preferred Alternative (LPA) and continues to coordinate with the partner jurisdictions. In addition, the LPA meets the Purpose and Need of the Project as described in the Draft EIS/EIR, in particular "Address mobility and access constraints faced by transit-dependent communities and environmental justice communities."

Comment ID	Response
RA-2-5	The Draft EIS/EIR and its supporting analysis included evaluation of the affected environment and existing conditions for each environmental topic evaluated. Acquisitions and displacements are discussed in Chapter 4, Section 4.3 of the Draft EIS/EIR and in greater detail in the *West Santa Ana Branch Transit Corridor Project Final Displacements and Acquisitions Impact Analysis Report* (Appendix H to the Draft EIS/EIR). The supply of currently available replacement sites for business displacements within a 6-mile radius is sufficient to relocate nearly all displaced businesses. Metro will provide relocation assistance and compensation for all displaced businesses as required under the Uniform Act and California Relocation Act. Metro will also follow the policies and procedures contained within Metro's acquisition and relocation policies and procedures. It is likely that some of the displaced jobs would be relocated within their local municipalities. The economic and fiscal analysis also found that redevelopment opportunities and construction jobs and construction-related spending will contribute to increasing tax revenues. Both the acquisition and displacement and economic and fiscal analyses were updated for the Final EIS/EIR to reflect refinements to the LPA. Refer to Sections 4.3 and 4.17, respectively, of the Final EIS/EIR for the updated analysis. As discussed therein, the LPA with the MSF will require 50 full acquisitions and will displace approximately 59 businesses. The Project will also comply with existing Metro policies and programs that support job creation and workforce development, including the Project Labor Agreement & Construction Careers Policy and Local Hire Program. These policies and programs encourage construction employment and training opportunities to those who reside in economically disadvantaged areas of Metro construction projects. See response CR-GEN-5 regarding the implementation and recommendation of feasible mitigation measures.

Comment ID	Response
RA-2-6	Chapter 4, Section 4.10.2.3 of the Draft EIS/EIR identifies common railroad corridor contaminants as a hazardous material concern along the project corridor. In addition, Section 4.4 of the *West Santa Ana Branch Transit Corridor Project Final Hazardous Materials Impact Analysis Report* (Appendix S of the Draft EIS/EIR) identifies petroleum hydrocarbons, pesticides/ herbicides, polycyclic aromatic hydrocarbons, and heavy metals, including arsenic and lead, as common contaminants in railway corridors. Project Measures HAZ PM-5 (Property Assessment – Phase I and II Environmental Site Assessments [ESAs]), HAZ PM-7 (Disposal of Groundwater), and HAZ PM-9 (Contaminated Soil, Soil Vapor, and Groundwater), discussed in Chapter 4, Section 4.19.3.10 of the Draft EIS/EIR, address effects associated with transporting contaminated soil and groundwater and details how contaminated soil and groundwater will be handled during construction. Chapter 4, Section 4.19.3.10 of the Draft EIS/EIR, under the subheading "Project Measures" includes Project Measure HAZ PM-5 (Property Assessment – Phase I and II ESAs) which requires the assessment of land use history for each parcel/property that will be acquired/utilized for the Project, including the railroad corridor. HAZ PM-5 also states that the determination of parcels that require a Phase II ESA (i.e., soil, groundwater, soil vapor subsurface investigations) will be evaluated after the Phase I ESAs have been completed and will be based on the results of the Phase I ESAs. Suspected contaminated soils will be managed through Project Measure HAZ PM-9 (Contaminated Soil, Soil Vapor, and Groundwater) which states a Soil Management Plan and/or a Soil Reuse Management Plan will be prepared and will include specifications regarding proper management and disposition of contaminated soils. The management of soil will be determined in consultation with the appropriate regulatory agencies and in accordance with applicable federal and/or state guidance. Suspected contaminated soil will either be profiled via laboratory analysis prior to disturbance or during construction. Once laboratory results are available, a determination of appropriate reuse or disposal options can be determined based on the concentrations of contaminants present in the soil. Landfills and recycling facilities that may be used could include, but are not limited to, Soil Safe Thermal Desorption Facility (Adelanto, CA), Waste Management Kettleman Hills Facility (Kettleman City, CA), CleanHarbors Buttonwillow Landfill (Buttonwillow, CA), and Waste Management McKittrick Waste Landfill (McKittrick, CA). Haul routes for construction materials, including contaminated materials, will be identified as part of the Transportation Management Plan (TMP).
RA-2-7	See responses to comments RA-2-4 and RA-2-5, and CR-GEN-5 regarding the implementation and recommendation of feasible mitigation measures.
RA-2-8	The identified items included in the attachment are addressed individually where they appear in the attachment.
RA-2-9	The identified items are addressed individually in the responses that follow.
RA-2-10	The environmental analysis for the Project is included in Chapter 3 and Chapter 4 of the Draft EIS/EIR. Chapter 3 provides an evaluation of impacts to the transportation system, including traffic, transit, active transportation, parking, and freight. Chapter 4 includes the evaluation of a variety of environmental topics. Section 4.19 includes the discussion of construction impacts for each environmental topic, including Communities and Neighborhoods (Section 4.19.3.2), Displacements and Acquisitions (Section 4.19.3.3), Economic and Fiscal Impacts (Section 4.19.3.17), and Safety and Security (Section 4.19.3.18). Metro will continue to coordinate with the affected jurisdictions and local agencies in support of the Community Outreach Plan as required in Mitigation Measure COM-1 (Construction Outreach Plan).

Comment ID	Response
RA-2-11	With implementation of Mitigation Measure TRA-19 (Loss of Parking [Construction]), referred to as Mitigation Measure TRA-21 in Chapter 3, Section 3.7.3.8 of the Draft EIS/EIR, Metro will coordinate with local jurisdictions to address the loss of public parking spaces during construction. As stated, "This could include, but not be limited to, restriping the existing street to allow for diagonal parking, reducing the number of restricted parking areas, phasing construction activities in a way that minimizes parking disruption, and adjusting the time limits for on-street parking." Additionally, with implementation of TRA-18 (Transportation Management Plan(s) (TMPs)), (referred to as Mitigation Measure TRA-20 in the Draft EIS/EIR), TMPs will be prepared to address potential impacts from construction activities on vehicular, transit, pedestrian, and bicycle access and mobility. Where Mitigation Measure TRA-18 is implemented, TMPs will be coordinated with local jurisdictions, agencies, and other potentially affected parties and will identify specific strategies, responsible parties for implementation, parties to be coordinated with, and implementation timing.
RA-2-12	See Common Response CR-DIS-1 regarding compliance with the Uniform Act and California Relocation Act.
RA-2-13	As discussed in Chapter 4, Section 4.3.3.2, under the subheading "Replacement and Relocation" of the Draft EIS/EIR, a gap analysis was "conducted to identify available replacement sites for lease and sale within each city and 6 miles of each affected property based on market conditions and vacancy as of June/July 2020. Table 4.3.7 [of the Draft EIS/EIR] summarizes the gap analysis, which determined that a sufficient number of comparable replacement sites may not be available within displacement cities, specifically for automotive businesses in the Cities of Los Angeles and South Gate. These uses may not be able to relocate within the same city; however, expanding the search to nearby cities shows that a sufficient number of replacement sites are available within 6 miles of the affected business." Chapter 4, Section 4.3.3.8 of the Draft EIS/EIR further discusses strategies to address complex relocation issues related to commercial and industrial businesses. Chapter 4, Section 4.3.3.2 of the Final EIS/EIR has been updated based on refinements to the LPA and the gap analysis based on market conditions and vacancy as of June/July 2023. As discussed in Section 4.3.3.2 under the subheading "Replacement and Relocation" of the Final EIS/EIR, Table 4.3.5 summarizes the gap analysis, which determined that a sufficient number of comparable replacement sites may not be available within displacement cities, specifically for automotive businesses in the Cities of Los Angeles, South Gate, Cudahy, and Artesia; a food service and a hotel property in the City of Huntington Park; and a nursery property in the City of South Gate. Expanding the search to nearby cities shows that a sufficient number of replacement sites are available within 6 miles of the affected location for the automotive businesses in the Cities of Los Angeles, South Gate, Cudahy, and Artesia; and the food service business and hotel property in the City of Huntington Park. However, special property conditions, such as the nursery in the City of South Gate and the Hollywood Sports Paintball & Airsoft Park and Bellflower BMX business, may not be able to relocate within the city or within 6 miles of the affected business. As discussed in Chapter 4, Section 4.3.3.2, Section 4.3.3.4, and Section 4.3.36 of the Final EIS/EIR, Metro will provide relocation assistance and compensation for all identified eligible displaced businesses and residences as required under the Uniform Act and California Relocation Act. See Common Response CR-DIS-1 regarding compliance with the Uniform Act and California Relocation Act.

Comment ID	Response
RA-2-14	Metro transit projects, including the WSAB Project, assess potential noise impacts using the FTA Transit Noise and Vibration Impact Assessment Manual, 2018. Mitigation measures included for other Metro transit projects typically include soundwalls, special track work to reduce rail noise, and lubrication on curves to reduce wheel squeal. Mitigation measures for the Project, as described in Chapter 4, Section 4.7.4.2 of the Draft EIS/EIR, include soundwalls, low-impact frogs for crossover noise, wheel squeal noise monitoring, traction power substation noise reduction measures, crossing signal bell shrouds, and the gate-down-bell-stop variance. See Common Response CR-NOI-1 regarding guidance used for the noise impacts analysis and proposed mitigation measures to reduce noise levels during construction and operation activities. Additional analysis has been prepared since the Draft EIS/EIR to identify possible additional noise reduction measures. The noise analysis in Section 4.7.3 and 4.7.4 of the Final EIS/EIR incorporates additional analysis completed since the Draft EIS/EIR to identify possible additional noise reductions. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Report* (previously Appendix M of the Draft EIS/EIR). In response to comments on the Draft EIS/EIR, and based on coordination with the California Public Utilities Commission (CPUC), Metro completed additional analysis and included additional project measures, such as bell shrouds NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop Variance), that reduced the number and severity of noise impacts near at-grade crossings. These project measures remain subject to CPUC approval. The updated analysis is reflected in Chapter 4, Section 4.7 of the Final EIS/EIR and in the updated *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Report.*
RA-2-15	Metro encourages, supports, and recommends affected cities develop plans, goals, and development that incorporate bicycle facilities that connect with public transportation. Implementation of Mitigation Measure LU-1 (Consistency with Bike Plans) will maintain connectivity of existing bicycle paths in the affected cities. As explained in Chapter 4, Section 4.1.3.2, of the Draft EIS/EIR, Metro will continue to coordinate with the affected jurisdictions and local agencies to minimize the preemption of future development, goals, and plans within each of the affected jurisdictions. As part of this effort, Metro, as appropriate, will support preparation of amended language for each affected bicycle plan demonstrating that planned bicycle facilities could still achieve an individual city's mobility and connectivity goals. However, because the process to amend bike plans is a local process, including public participation, the ultimate outcome and resolution of plan elements cannot be predicted. Metro will continue to encourage, support, and recommend that the affected cities develop plans, goals, and development that incorporate bicycle facilities that achieve the affected cities' mobility and connectivity goals.
RA-2-16	Metro continues to coordinate with partner jurisdictions. Refer to response CR-FIN-1 regarding local contribution requirements.

Comment ID	Response
RA-2-17	Metro will continue to actively work with the various cities along the LPA alignment to implement project measures and mitigation measures identified in the Draft and Final EIS/EIR. Metro will coordinate with city staff per executed Master Cooperative Agreements. The Master Cooperative Agreements provide cities the opportunity to review design packages and provide comments. Transportation Mitigation Measures TRA-1 through TRA-17 recommend specific roadway lane and/or traffic signal modifications at locations where traffic impacts were identified based on changes in level-of-service. Each of these mitigation measures are subject to the approval of the local jurisdiction(s), and design will continue to be coordinated with the jurisdiction(s) during future design phases. Transportation project measures are specific design features for the Project and have been coordinated with local jurisdictions during project development. Similar to mitigation measures, design of the project measures will continue to be coordinated in future design phases. Some project measures, such as TR PM-3 (Randolph Street Intersection Modifications) and TR PM-7 (Bellflower MSF entrance/exit driveway), are requests from local jurisdictions. New traffic signals are proposed at a number of locations along and near the LPA alignment. Metro will continue to work with the applicable jurisdiction to advance the design and implementation of traffic signals and adjustments to signal design and timing where required as part of a project measure or mitigation measure.
RA-2-18	Bus connections at proposed stations will be considered as part of a bus connection interface study that will be conducted as design advances and prior to the start of revenue service.

Long Beach Transit

From: Hsiao, Shirley <shsiao@lbtransit.com>
Sent: Friday, October 8, 2021 11:28 AM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Dierking, Mark <DierkingM@metro.net>
Subject: LBT Review Comments on WSAB DEIR/EIS

Hi Meghna,

Enclosed is the LBT submittal on WSAB DEIR/EIS review comments.
Please let us know if you have any questions.
Look forward to collaborating with your team on the bus/rail connection design effort later on !

RA-13-1

Best,

Shirley Hsiao |Service Planning Manager
Service Planning
Long Beach Transit | lbtransit.com
(P) 562.599.8540 | (E) shsiao@lbtransit.com
1963 E. Anaheim St., Long Beach, CA 90813

"Dedicated to connecting communities and moving people...
making everyday life better."

From: Hsiao, Shirley
Sent: Wednesday, September 29, 2021 9:02 AM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Dierking, Mark <DierkingM@metro.net>
Subject: RE: Thank you for your inquiry Shirley

Hi Meghna,

Thanks for approving the request for comment period extension.
We will submit our review comments by October 8, 2021.

Best,

Shirley Hsiao |Service Planning Manager
Service Planning
Long Beach Transit | lbtransit.com
(P) 562.599.8540 | (E) shsiao@lbtransit.com
1963 E. Anaheim St., Long Beach, CA 90813

"Dedicated to connecting communities and moving people... making everyday life better."

From: Khanna, Meghna <KhannaM@metro.net>
Sent: Tuesday, September 28, 2021 5:11 PM
To: Hsiao, Shirley <shsiao@lbtransit.com>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Dierking, Mark <DierkingM@metro.net>
Subject: FW: Thank you for your inquiry Shirley

Hello Shirley,
In coordination with FTA, we have agreed to extend the comment period to **October 8, 2021** per your request. Your email below will be included and noted in the administrative record.
We look forward to receiving your comments by **October 8, 2021**.
Please feel free to contact us if you have any questions.
Thanks,
Meghna Khanna, AICP
LA Metro
Senior Director, Countywide Planning & Development
Mobility Corridors
213.922.3931
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Metro provides excellence in service and support.

---------- Original Message ----------
From: Hsiao, Shirley [shsiao@lbtransit.com]
Sent: 9/28/2021, 4:24 PM
To: wsab@metro.net; mkhanna@metro.net
Subject: From Long Beach Transit

Dear Ms. Khanna,

Greetings from Long Beach Transit!

Our Service Planning team has prepared comments on the draft EIR released for the West Santa Ana Branch Transit Corridor, but it is being circulated for internal review and approval at this time. Given today is the due day for comments, may I request an extension for submittal in the next week or two? Or I should email you the current draft version as a placeholder, then replace with the formal submittal later on? Please let me know.

Thank you so much!

Best,

Shirley Hsiao |Service Planning Manager
Service Planning
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LONG BEACH TRANSIT

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www.lbtransit.com

September 21, 2021

To: Meghna Khanna, Senior Director, Metro Countywide Planning & Development

From: Shirley Hsiao, Service Development Manager, Long Beach Transit

Cc: Lee Burner, Executive Director/VP, Transit Service Delivery and Planning

Re: Long Beach Transit Review Comments on WSAB DEIR

Dear Ms. Khanna:

The purpose of this memorandum is to provide review comments on the West Santa Ana Branch (WSAB) Draft EIS/EIR.

Recognizing the importance of rail/bus connection at stations, Long Beach Transit (LBT) would like to recommend that each WSAB station concept design illustrate how local buses will circulate with safe and convenient accessibility for passenger use. RA-13-2

Based on LBT's routing network, a conceptual plan on the bus feeder route connection has been prepared at each rail station for the Metro project team to reference. The table below highlights the recommendation of layover and bus bay improvements to be specified for LBT use in the final EIR. We appreciate the DEIR review opportunity and would be glad to discuss this subject further.

LBT Comments on WSAB DEIR Station Design

Station:	LBT Routes	Bus Connection Requests:	
I-105 Station	21, 23	Two pull-out bus bays are required for LBT use.	RA-13-3
Rosecrans & Paramount Station	21, 23, 71	Turnaround loop and layover space required for two LBT buses	RA-13-4
Bellflower Station	91, 92, 93	Turnaround loop and bus stop to accommodate 2 LBT buses in each direction.	RA-13-5
Pioneer Station	130, 172, 173, 192	Three layover space and bus bays for LBT use.	RA-13-6

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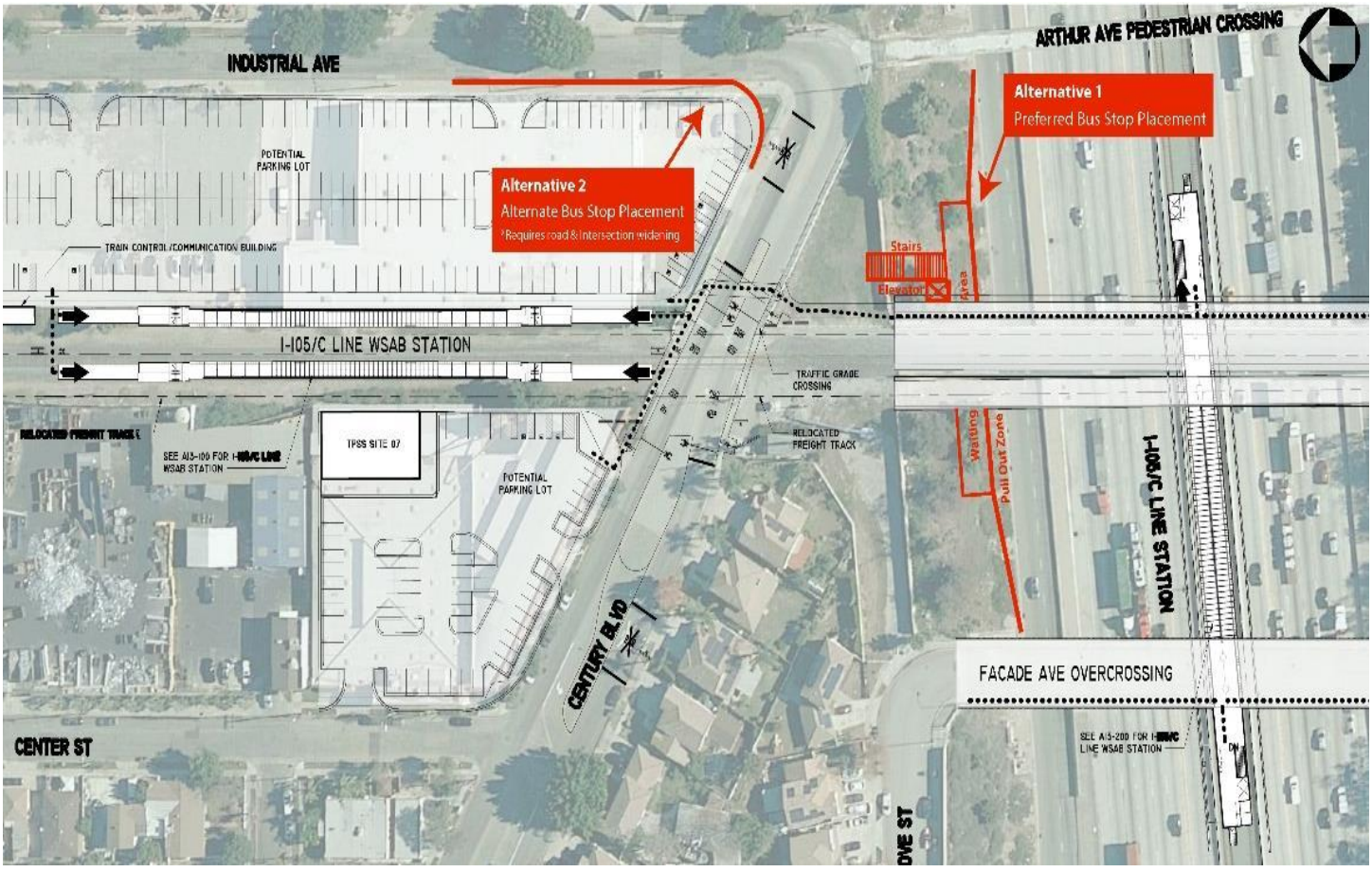
1. I-105 Station

LBT proposes extending Lines 21 and 23 to the I-105 Station. Line 21 operates from Downtown Long Beach to Rosecrans Avenue mostly along Cherry and Garfield Avenues, and Line 23 follows a similar routing to Line 21 except for serving a short stretch of Paramount Blvd in the city of Paramount. The routes will be extended to serve this station via a loop from Garfield/Paramount via S/N Somerset Ranch Road, Garfield Avenue/Paramount Blvd, N/S Somerset Ranch Road.

RA-3-7

Two pull-out bays suitable for a layover would need to be provided at N Somerset Ranch Road with an ADA accessible entrance to the station. This would allow our customers access to not only the WSAB Line but also the existing C (Green) Line. Alternative 1 on N Somerset Road is operationally preferred to limit lengthy deviations in the adjacent residential neighborhoods.

Note: If Alternative 1 is not possible, LBT prefers to end Lines 21 & 23 at the Paramount/Rosecrans Station.



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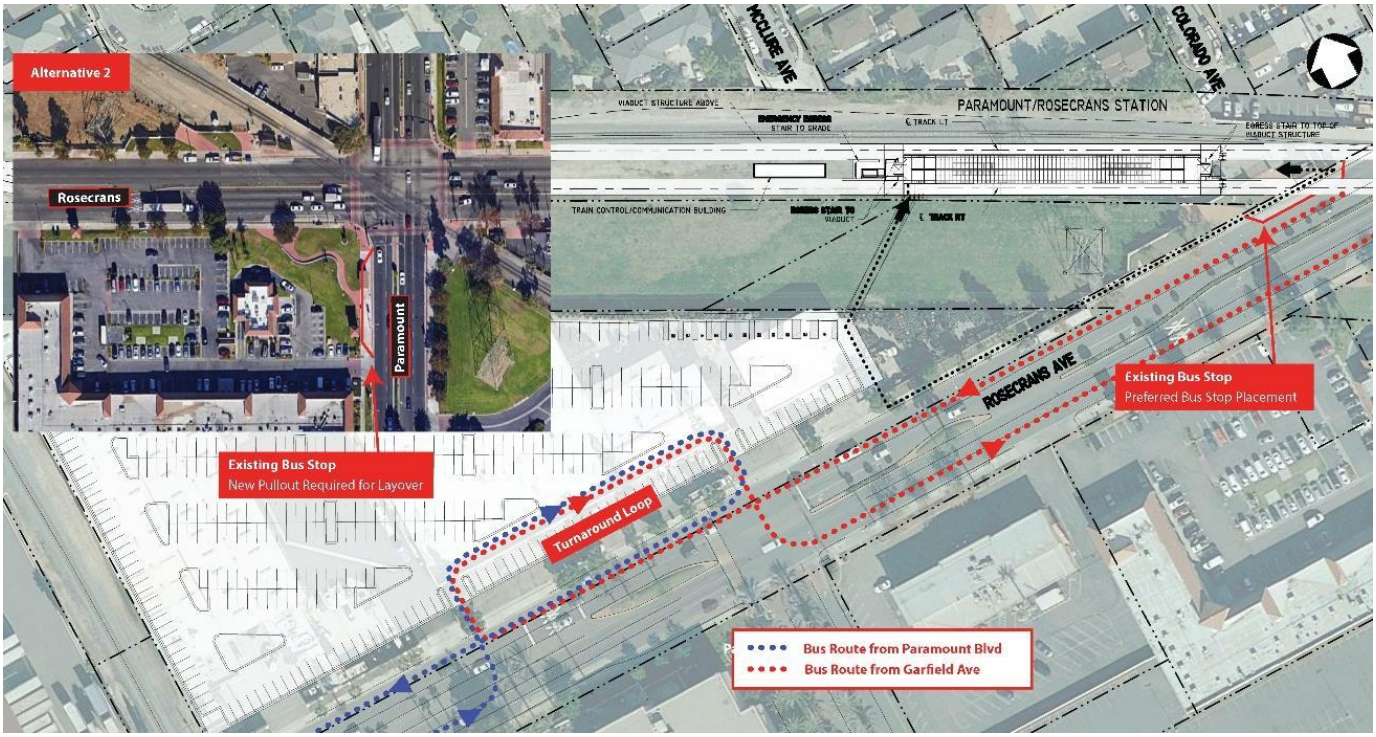
2. Paramount / Rosecrans Station

Option 1 - LBT's existing Routes 21, 23 and 71 will serve on-street stops at this location. A turnaround loop will be required in the parking lot to orient buses in the correct direction. Buses will layover on the westbound direction of Rosecrans Ave, after the existing bus stop.

RA-3-8

Option 2 - Relocate the end of line/layover to the corner of Paramount and Rosecrans. Routes 21 & 23 layover on Rosecrans at Paramount NW is fine as shown in the site plan. However, Paramount at Rosecrans SW requires constructing a pull-out bus bay to allow for layover on Paramount (by Dentist sign). Alternatively, the layover could occur before the intersection on Rosecrans by removing a travel lane and peak hour parking restrictions.



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3. Bellflower Station

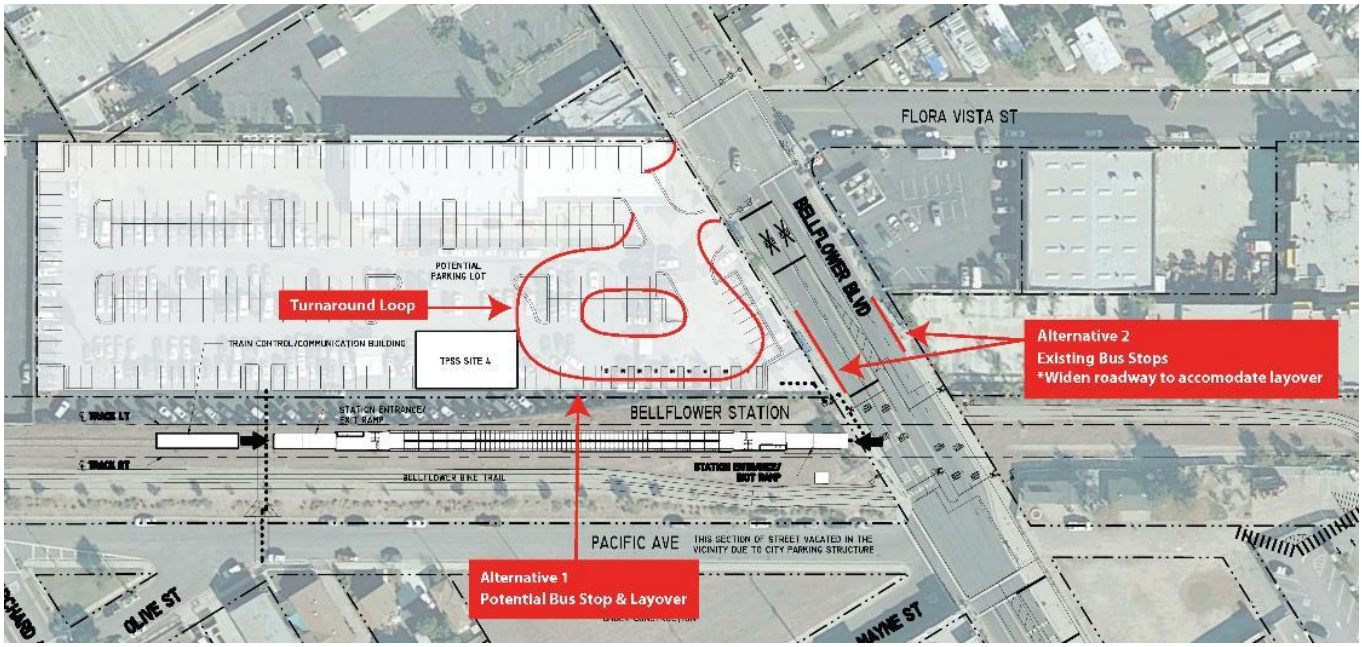
LBT's existing Routes 91, 92, and 93 operate in the vicinity of this station. In the future, Routes 91, 92 & 93 will end at the Bellflower Station. Route 92 will be extended from Alondra at Woodruff via Alondra, Bellflower, or by using Flower between Woodruff and Bellflower.

To allow for buses to end and layover at this station, LBT would like to request the following:

a. One bus stop in each direction on Bellflower Blvd directly in front of the station. Both bus stops should allow space for two buses to layover/board/disembark passengers simultaneously. Both of these bus stops should be located sufficiently south of the turnaround described below, to allow for buses serving both stops to utilize the turnaround.

b. Space for a 40' transit coach to turn around in the park and ride lot adjacent to the station. This turn around should be accessible from both the north and the south to allow for buses to be oriented in the correct direction without utilizing residential streets. The entrance/exit to this turnaround from Bellflower Blvd should be traffic signal controlled. If space in the turnaround loop permits, a bus stop should be added to provide a safer boarding location for passengers.

RA-3-9



LONG BEACH TRANSIT
1963 E. Anaheim St., Long Beach, CA 90813
Phone: 562.591.8753 I Fax: 562.218.1994
www.lbtransit.com

4. Pioneer Station

The following routes are proposed to be modified to serve Pioneer Station:

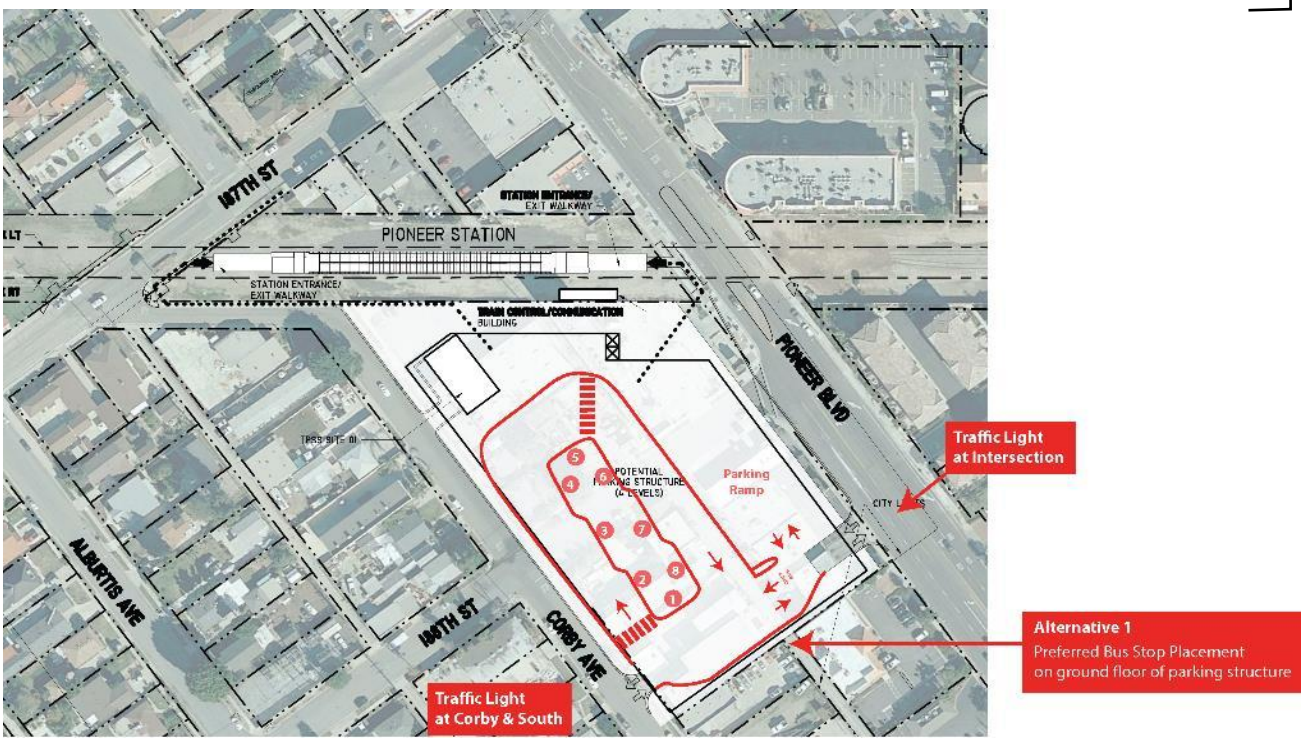
a. Current Metro / future LBT Route 130 Artesia Blvd will be extended from Cerritos Center to Pioneer Station via 183rd, Pioneer to Pioneer Station. This route will need to layover at the Pioneer Station bus facility.
b. LBT Route 192 South Street will be extended from Cerritos Center to Pioneer Station via South, Pioneer to Pioneer Station. This route will need to layover at the Pioneer Station bus facility.
c. LBT Route 173 will loop through the Pioneer Station bus facility but will continue to layover at Norwalk Station.

RA-3-10

Other nearby routes will not be modified. Route 172 will continue to layover at Cerritos Center or Norwalk Station, depending on the time of day, and Route 191 will continue to terminate on Del Amo at Bloomfield.

In conclusion, LBT would like to request space for three buses to layover at Pioneer Station and two bus stop boarding locations at Pioneer Station (i.e., one for 173 North, 192 and one for 173 South, 130).

Note – if no layover space is provided 130 and 192 will have to stop on street and interline with each other. If that were to happen 192 would have to end at Del Amo Station due to the length of the route. New Route 12 would have to cover downtown – Del Amo Station.



Long Beach Transit – RA-13

Comment ID	Response
RA-13-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
RA-13-2	Metro acknowledges the conceptual plan for bus feeder routes provided by the commenter. Bus connections at proposed stations will be considered as part of a bus connection interface study that will be conducted as design advances and prior to the start of revenue service. Metro will coordinate with Long Beach Transit in support of this study.
RA-13-3	See response to comment RA-13-2.
RA-13-4	See response to comment RA-13-2.
RA-13-5	See response to comment RA-13-2.
RA-13-6	See response to comment RA-13-2.
RA-13-7	See response to comment RA-13-2.
RA-13-8	See response to comment RA-13-2.
RA-13-9	See response to comment RA-13-2.
RA-13-10	See response to comment RA-13-2.

Los Angeles County CEO's Office

From: Ivan Matthews (contractor) <IMatthews@ceo.lacounty.gov>
Sent: Tuesday, September 28, 2021 5:32:13 PM
To: Khanna, Meghna <KhannaM@metro.net>
Subject: LA County CEO Response letter to WSAB DEIR

Good evening Meghna,
Please see the attached letter from the LA County CEOs Office regarding the WSAB DEIR.

RA-12-1

Please let me know if you have any questions.

Thank you
Ivan

Ivan Matthews | **Master Planning Unit**
Kenneth Hahn Hall of Administration – Chief Executive Office
500 West Temple Street, Los Angeles CA 90012
Office 213-202-5825

County of Los Angeles
CHIEF EXECUTIVE OFFICE
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
http://ceo.lacounty.gov

FESIA A. DAVENPORT
Chief Executive Officer

September 28, 2021

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

Dear Ms. Khanna:

WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS FROM COUNTY OF LOS ANGELES CHIEF EXECUTIVE OFFICE

Thank you for providing the County of Los Angeles Chief Executive Office ("County") an opportunity to review and provide comments on the West Santa Ana Branch Transit Corridor Project Draft Environmental Impact Report ("WSAB DEIR").

The County has completed a review of the document and focused its attention on the future Gardendale Station in the City of Downey, as it is adjacent to a large County owned property, the Rancho Los Amigos South Campus. The current Gardendale Station Plan does not incorporate any dedicated parking for future Metro riders and assumes all riders will live in the immediate area of the station. The County highly encourages Metro to work proactively and collaboratively with the surrounding cities, Downey and Southgate, and Los Angeles County to identify a future location and funding for a dedicated parking area to minimize potential future Metro riders parking their vehicles on residential streets. RA-12-2

If you have any questions regarding these comments, please contact Ivan Matthews by email at imatthews@ceo.lacounty.gov, or by telephone at (213) 202-5825.

Sincerely,

KELLY QUINN, Manager
Master Planning Division

KQ:MWT:kb

Attachment

Los Angeles County CEO's Office – RA-12

Comment ID	Response
RA-12-1	Metro has coordinated internally with its departments and all internal comments have been considered in project development.
RA-12-2	See response CR-TRA-1 regarding additional transit parking and the spillover parking analysis. The Transit Parking Study determined that the provision of parking facilities beyond what is proposed in the Draft EIS/EIR was not recommended. The spillover parking analysis has been updated in the Final EIS/EIR to include stations that do not provide transit parking. Table 3.20 in Chapter 3, Section 3.4.4 of the Final EIS/EIR notes that the projected 2042 transit parking demand at the Gardendale Station is approximately 200 spaces. At stations where transit parking is not provided, it is assumed that demand will shift to the stations with transit parking. The Firestone Station and I-105/C Line Station, which are the stations nearest to the Gardendale Station, are projected to have excess parking supply to accommodate a shift in demand. Additionally, on- or off-street parking impacts were not identified within the City of Downey. Off-street parking will not be removed within Los Angeles County or the City of Downey.

Los Angeles County Department of Public Works

From: Toan Duong <TDUONG@dpw.lacounty.gov>
Sent: Monday, October 18, 2021 12:56 PM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Aracely Lasso <ALASSO@dpw.lacounty.gov>; Daniel Keyribaryan <DKeyribaryan@dpw.lacounty.gov>; Ed Gerlits <EGERLITS@dpw.lacounty.gov>
Subject: RE: DEIR for the West Santa Ana Branch Transit Corridor Project (RPPL2021008777)

Mrs. Meghna Khanna, Project Manager

Please see attached for Public Works formal response to the subject project DEIR.

RA-8-1

Regards,

Toan Duong
Civil Engineer
Los Angeles County Public Works
Office: (626) 458-4921

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

MARK PESTRELLA, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

October 12, 2021

IN REPLY PLEASE
REFER TO FILE: LD-3

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

Dear Ms. Khanna:

DRAFT ENVIRONMENTAL IMPACT REPORT
WEST SANTA ANA BRANCH TRANSIT CORRIDOR (WSAB) PROJECT
ENVIRONMENTAL PLAN (RPPL2021008777)

Public Works reviewed the Draft Environmental Impact Report (DEIR) for the proposed project. The project would extend a new light rail line from four possible northern termini in Downtown Los Angeles through southeast Los Angeles County to a southern terminus in the City of Artesia. RA-8-2

We have the following comments for your consideration:

1. **General Comments:**

   1.1. Any activities impacting Public Works' Hollydale Yard, near the proposed Gardendale Station, should be coordinated with Public Works. Any proposed use of County property for "Temporary Construction Easement" and a "Partial Acquisition" will require approval from the County. For additional information, please contact Jolene Guerrero of Public Works, Operational Services Division, at (626) 458-7300 or jguerrer@pw.lacounty.gov. RA-8-3

   1.2. The infrastructure identified in the Metro Board-approved A (Blue) Line First Last Mile Plan for the Slauson station should be incorporated into the First Last Mile Plan for the West Santa Ana Branch proposed Slauson station. RA-8-4

2. **Section 4.11.1.1, Regulatory Setting, page 4-416:**

   Please note the requirements of the Governor's Executive Order B37-77 regarding the minimization and avoidance of flood hazards in connection with state financed, insured, or assisted improvements. If the proposed project is receiving State assistance, the project will need to meet Executive Order. B37-77 RA-8-5

requirements state agencies issuing permits, such as the State Water Resources Control Board, Regional Water Quality Control Boards, and Department of Fish and Wildlife, will also need to comply with the Executive Order. RA-8-5

3. **Section 4.11.2.3, Floodplains, Figure 4.11-4, page 4-427:**

There appears to be a discrepancy between the 500-year flood zone in this figure in comparison to Public Works' records. Public Works' 500-year flood zone determination is available online at https://pw.lacounty.gov/floodzone and is shown in bright green. The remaining "X-Shaded" zones shown on the FEMA Flood Insurance Rate maps are areas protected from a 1 percent annual chance flood by levees. Any adverse impacts to the levees from the proposed project could thus increase flood hazards in these areas. RA-8-6

4. **Section 4.11.3, Environmental Consequences/Environmental Impacts, page 4-428 - 4-444:**

- The levees of the Los Angeles River, Rio Hondo River, and San Gabriel River were constructed by the U.S. Army Corps of Engineers (USACE) and will thus require a 408 Permission from the Corps. The Los Angeles River, Rio Hondo River, and San Gabriel River channels are maintained by the Los Angeles County Flood Control District (LACFCD) and permits from the LACFCD will be required. The USACE 408 process and the LACFCD's permit process for the project's final design will require proof, by engineering analyses if necessary, to ensure the proposed project does not adversely impact the structural integrity of the levees, nor decrease the USACE and FEMA required freeboard of the Los Angeles River, Rio Hondo River, and San Gabriel River channels. RA-8-7

- The Los Angeles River, Rio Hondo River, and San Gabriel River channels are all in a FEMA Zone A (1 percent annual chance flood area, no Base Flood Elevations defined). The final design of the proposed project will be required to comply with the requirements of Title 44 of the Code of Federal Regulations (44 CFR), Part 60.3(b)(4), in regard to the impacts to the Base Flood Elevation, and the LACFCD permit process will require proof of compliance. RA-8-8

- LACFCD permits will require the project to include measures to ensure drainage patterns are maintained at all times during construction. All work involving LACFCD's storm drains and flood control channels shall occur outside the period of October 15 through April 15 (storm season). RA-8-9

5. **Section 4.11.3.3, Alternative 1: Los Angeles Union Station to Pioneer Station Floodplains, page 4-436, Paragraph 5:**

   There appears to be a discrepancy between the 100-year flows used in Appendix T for the Los Angeles River and the Rio Hondo for all four alternatives and the 100-year flows in comparison to Public Works' records for these channels. Public Works' flood zone determination is available at https://pw.lacounty.gov/floodzone. RA-8-10

6. **Section 4.11.5.7, In Flood Hazard, Tsunami, or Seiche Zones, Risk Release of Pollutants Due to Project Inundation, Page 4-448 – 4-449:** RA-8-11

   Our comments from Section 4.11.3 also apply to this section.

7. **Section 4.19.2.3, Utility Relocation and Installation, Page 4-609:**

   This section indicates the project will require relocation or protection in place of some LACFCD storm drains. This protection or relocation work should comply with the LACFCD Guidelines for Overbuilding and Air Rights document available online at https://dpw.lacounty.gov/spats/public/spatsfaq/forms/GUIDELINES-OVERBUILD.pdf. RA-8-12

   For questions regarding the above comments, please contact Patricia Wood of Public Works, Stormwater Engineering Division, at (626) 458-6131 or pwood@pw.lacounty.gov.

If you have any other questions or require additional information, please contact Aracely Lasso of Public Works, Land Development Division, at (626) 458-5915 or alasso@pw.lacounty.gov.

Very truly yours,

MARK PESTRELLA, PE
Director of Public Works

for

GREG EVEN, PE, MBA
Assistant Deputy Director
Land Development Division

DK:la
P:\ldpub\SUBPCHECK\Plan Checking Files\Projects submitted by Other Agencies\RPPL2021008777 - West Santa Ana Branch Transit Corridor Project\DPW_Not Cleared_2021-09-27_RPPL2021008777.docx

Los Angeles County Department of Public Works – RA-8

Comment ID	Response
RA-8-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
RA-8-2	The comment regarding the Project is acknowledged.
RA-8-3	Metro will coordinate with Los Angeles County Public Works for proposed use of county property.
RA-8-4	First/Last Mile (FLM) Planning considered existing FLM plans at proposed Locally Preferred Alternative (LPA) stations. Local plans and projects were reviewed during a data compilation task, and relevant FLM projects formed the basis of the initial potential projects lists, along with input from City of LA and LA County during agency coordination meetings.
RA-8-5	It is presumed that the comment refers to Executive Order (EO) B39-77. Discussion of the EO and the Cobey-Alquist Floodplain Management Act have been included in Chapter 4, Section 4.11.1.1 of the Final EIS/EIR, under the subheading "State" and to Section 3.2.9 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report* (previously Appendix T of the Draft EIS/EIR). Metro will comply if state assistance subject to Executive Order B39-77 is received.
RA-8-6	The current LA County floodplain information was reviewed and Figure 4.11-3 in Chapter 4, Section 4.11.2.1 of the Final EIS/EIR and Figure 4-3 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report* (previously Appendix T of the Draft EIS/EIR) reflect the most current floodplain information. As discussed in Section 4.11.3.3 Floodplains and in the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report* in Section 5.3.4, the aerial LRT structures will be elevated above existing levees to limit impacts on floodwaters and the existing flood control channels. Therefore, there will be minimal impacts to the existing levees, and no increases in flood hazards are expected in these areas.
RA-8-7	Chapter 4, Section 4.11.1.1 under the heading "Federal" of the Draft EIS/EIR includes a discussion on the Section 408 Permit review and approval requirements by the U.S. Army Corps of Engineers (USACE). Chapter 4, Section 4.11.1.1 under the subheading "Regional" of the Final EIS/EIR and in Section 3.3.5 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report* was revised to include text reflecting that the Los Angeles River channel, Rio Hondo Channel, and San Gabriel River channel are maintained by the Los Angeles County Flood Control District (LACFCD) and construction and operation of the LPA will require approval by the LACFCD.
RA-8-8	Requirements of 44 Code of Federal Regulations 60 are discussed in Chapter 4, Section 4.11.1 of the Draft EIS/EIR. Metro will comply with these requirements, as it is expected that the LA County Flood Control District and USACE will make compliance with these requirements conditions of approval during the design phase of the Project.

Comment ID	Response
RA-8-9	Chapter 4, Section 4.11.3 of the Draft EIS/EIR discusses the low impact development (LID) strategies the Project will use to maintain pre-development drainage patterns(e.g., not to exceed pre-development storm water discharge rates). Chapter 4, Section 4.19.3.11 of the Draft EIS/EIR discusses the strategies to be used during construction to minimize impacts to existing drainage patterns. Additional discussion was added to Chapter 3, Section 3.3.5 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report* to clarify that LACFCD permits require drainage patterns to be maintained during construction and that work must be conducted outside the storm season. Chapter 4, Section 4.11.1.1 of the Final EIS/EIR, under the subheading "Regional" was updated to include the LACFCD and permitting requirements for modifications to county flood control facilities. Chapter 4, Section 4.19.3.11 under the subheading "Locally Preferred Alternative" of the Final EIS/EIR was updated to include discussion of the requirements to coordinate with both USACE and LACFCD to obtain permits for construction of facilities owned by these agencies. Metro is committed to coordinating with LACDPW and USACE during the final design and permitting. As part of the permit process, the final construction schedule will be subject to review. Metro will comply with these requirements, as it is expected that LA County Flood Control District and USACE will make compliance with these requirements conditions of approval during the design phase of the Project.
RA-8-10	The hydraulic analysis uses flow profiles provided directly by LACFCD in 2017. These flows are discussed in detail in Section 5.2 of Appendices A, B, and C of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report*. Data sources are identified in Table 5-4 in Chapter 5 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report*. See also response to comment RA-8-6.
RA-8-11	See responses to comments RA-8-7 through RA-8-10.
RA-8-12	The comment regarding LACFCD storm drains is acknowledged. Metro will comply with LACFCD Guidelines for Overbuilding and Air Rights, as applicable. Metro will comply with these requirements, as it is expected that LACFCD will make compliance with these requirements conditions of approval during the design phase of the Project.

Los Angeles County Department of Regional Planning

From: Patricia Hachiya [phachiya@planning.lacounty.gov]
Sent: 9/28/2021, 8:24 AM
To: wsab@metro.net
Subject: Comments on the WSAB EIS/EIR

Please see attached comments from the County of Los Angeles Department of Regional Planning. Thank you. RA-5-1

Patricia Lin Hachiya, AICP
Supervising Regional Planner
General Plan/Transit-Oriented Communities
Department of Regional Planning
Office: (213) 974-6316 (fastest way to reach me during the COVID period is via email)

In response to the evolving coronavirus emergency, Los Angeles County facilities are closed to the public at this time. For the most current information about available services, public meeting schedules, and planning projects, please visit planning.lacounty.gov

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

September 28, 2021
Meghna Khanna, Project Manager
Metro
One Gateway Plaza, MS 99-22-7
Los Angeles, CA 90012

Dear Ms. Khanna:

COMMENTS ON THE PROPOSED WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)/ENVIRONMENTAL IMPACT REPORT (EIR)

The County of Los Angeles Department of Regional Planning (DRP) appreciates the opportunity to provide written comments on the Draft EIR/EIS for the West Santa Ana Branch (WSAB) Transit Corridor Project. DRP recognizes the importance of this project and the numerous benefits it will provide to residents of Los Angeles County and is in full support of the development of the WSAB Corridor project. RA-5-2

DRP released a draft of the Florence-Firestone Transit Oriented District Specific Plan (FFTODSP) and the accompanying Draft EIR for public review from 9/21/21 to 11/5/21. The FFTODSP focuses on increasing housing opportunities, transit access, and density around the three A line stations of Slauson, Florence, and Firestone. The greatest amount of density is being proposed around the unincorporated Los Angeles County side of the Slauson station, due, in part, to the three proposed WSAB Corridor alternatives that all include the Slauson station. For this reason, DRP is in support of alternatives 1, 2, and 3, which include the Slauson station; and not in support of alternative 4, which does not include the Slauson station. Please review the draft FFTODSP, section 3.2.2 Slauson Station TOD Area Concept, on pg. 3-5, which focuses on the Slauson station (https://planning.lacounty.gov/assets/upl/project/fftod_draft-specific-plan.pdf). RA-5-3

Through the FFTODSP and a pedestrian planning effort, the County has committed to increasing transit ridership, and promoting active transportation and safety in Florence-Firestone. Metro's investment in a station for the WSAB line would be heavily leveraged with the County's planning efforts. These efforts are described in greater detail in section 5.3 Summary of Major Projects in the Mobility chapter of the FFTODSP. RA-5-4

Furthermore, during the process of developing the FFTODSP, community stakeholders overwhelmingly identified the need for additional parking for potential riders of the A line. Metro should consider innovative parking strategies for the station areas to serve Florence-Firestone and the surrounding community. RA-5-5

If you have any questions, please contact me at phachiya@planning.lacounty.gov. Thank you for the opportunity to provide our comments.

Sincerely,

DEPARTMENT OF REGIONAL PLANNING

Patricia L. Hachiya

Patricia L. Hachiya, AICP
Section Head, General Plan/Transit Oriented Communities Section

Los Angeles County Department of Regional Planning – RA-5

Comment ID	Response
RA-5-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
RA-5-2	The comment regarding the benefits of the Project is acknowledged.
RA-5-3	See response CR-GEN-1 regarding identification of the Locally Preferred Alternative (LPA). Alternative 3 was identified as the LPA, which includes a northern terminus at the Slauson/A Line Station.
RA-5-4	The comment regarding the County's planning efforts is acknowledged.
RA-5-5	See response CR-TRA-1 regarding transit parking.

Joint: Los Angeles Department of Transportation & Los Angeles Department of City Planning (Edward Guerrero Jr.)

From: Eddie Guerrero <eddie.guerrero@lacity.org>
Sent: Tuesday, September 28, 2021 8:02:14 PM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: doug.mensman@lacity.org <doug.mensman@lacity.org>; Sahag Yedalian <sahag.yedalian@lacity.org>; eric.bruins@lacity.org <eric.bruins@lacity.org>; Nate Hayward <nate.hayward@lacity.org>; Manuel Anaya <manuel.anaya@lacity.org>; Roy Kim <roy.kim@lacity.org>; Clare Eberle <clare.eberle@lacity.org>; Tanijiri, Randall <randall.tanijiri@lacity.org>; Jose Hernandez <jose.d.hernandez@lacity.org>; Tomas Carranza <tomas.carranza@lacity.org>; Jay Kim <jay.kim@lacity.org>; Wes Pringle <wes.pringle@lacity.org>
Subject: West Santa Ana Branch Draft EIR

Dear Ms. Khanna,

Attached is LADOT's and LADCP's joint letter of record regarding the subject project EIR.

Please advise if there are any problems accessing the attached letter or if there are any questions.

Thank you for the opportunity to comment on this very important project.

RA-6-1

--

Edward Guerrero Jr.
Senior Transportation Engineer
Transportation Planning & Development Review
Los Angeles Department of Transportation
213.972.8476

CITY OF LOS ANGELES

CALIFORNIA

Seleta J. Reynolds
GENERAL MANAGER

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
FAX (213) 972-8410

ERIC GARCETTI
MAYOR

September 28, 2021

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

WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT – LADOT AND CITY PLANNING COMMENTS

Dear Ms. Khanna:

The City of Los Angeles Departments of Transportation (LADOT) and City Planning (LACP) appreciate the opportunity to review the Draft Environmental Impact Report (EIR), dated July 2021, for the proposed West Santa Ana Branch Transit Corridor Project. As cited in the project abstract, Metro proposes to implement a light rail transit service that will extend from four possible northern termini through southeast Los Angeles County to a southern terminus in the City of Artesia. The Draft EIR included a review of the following four Build Alternatives and two design options:

- Alternative 1: Los Angeles Union Station to Pioneer Station
  - Design Option 1: Los Angeles Union Station – Metropolitan Water District (MWD) Station
  - Design Option 2: Addition of a Little Tokyo Station
- Alternative 2: 7th Street / Metro Center to Pioneer Station
- Alternative 3: Slauson / A Line (Blue) to Pioneer Station [Staff Preferred Alternative]
- Alternative 4: I-105 / C Line (Green) to Pioneer Station

RA-6-2

As noted above, the report cites Alternative 3 as the Staff Preferred Alternative (SPA) which would connect the new light rail service to the existing A (Blue) Line at the Slauson Avenue station. The report acknowledges that because Alternative 3 does not introduce new transit service north of the Slauson station, as would be the case with Alternatives 1 and 2, potential ridership for Alternative 3 will likely be measurably less than the potential ridership of Alternatives 1 or 2. However, the report is silent on how the new transit ridership introduced by the alternatives that end at Slauson Station will impact the operation of the existing A Line service. The A Line is currently particularly impacted in the street running portion between the 7th Street and Washington stations. Additionally, the selection of Alternative 3 as the SPA does not account for the anticipated housing and jobs growth outlined in the

RA-6-3

RA-6-4

proposed Downtown Community Plan's rezoning efforts - to which Alternatives 1 and 2 would provide direct, efficient, and reliable connection. To ensure a redress of these and other potential issues, LADOT and LACP offer the following comments and recommendations. RA-6-4

ANALYSIS

On July 30, 2019, the City of Los Angeles adopted vehicle miles travelled (VMT) as the criteria for determining transportation impacts under the State's California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the CEQA Guidelines. LADOT relies on comprehensive performance metrics that align with the City's Mobility Plan 2035 to ensure that important safety and accessibility needs are met in addition to the environmental goals captured in the new CEQA emphasis on vehicle miles traveled (VMT). In conjunction with the adoption of the VMT performance metric, LADOT also updated its Transportation Assessment Guidelines, which aims to provide clarity on methodologies, and distinction between impact categories that are required by CEQA from the analyses (non-CEQA) applied to address access, circulation, and safety concerns. The DEIR should consult and apply the most recent publication of the TAG update which can found on the LADOT website at https://ladot.city.org/businesses/development -reviews RA-6-5

CEQA Analysis

Section 2.3 of the LADOT Transportation Assessment Guidelines provides screening criteria, impact criteria and a methodology for determining if a transportation project would induce additional vehicle miles traveled (VMT). One of the key impact criteria defined for the CEQA analysis is the assurance that, *"A Proposed Project would have a significant impact related to transportation if it would "conflict with a program, plan, ordinance or publicly addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities."* RA-6-6

A conflict or inconsistency could result if the project proposes features that would obstruct the ability of the City to implement the policies and programs of the Mobility Plan 2035, which include implementing designated modal priority networks. The draft EIR acknowledges this potential impact in Section 3.6 for all of the proposed alternatives. To ensure full disclosure of all potential impacts, Section 3.6 of the draft EIR should be expanded to include an accounting of all pertinent plans and programs relevant to the project (similar to Table 4.1.4), such as the Plan for a Healthy Los Angeles and the proposed Downtown Los Angeles Community Plan and its zoning strategy. To facilitate this process, Attachment D (Plans, Policies and Programs Consistency Worksheet) of LADOT's Transportation Assessment Guidelines should be consulted.

NON-CEQA Analysis

The adoption of the Mobility Plan 2035 committed the City to continue to communicate to the public the consequences of any major proposed changes to the public right-of-way that carries out the Plan's vision. As discussed above, in addition to revising our review procedures to comply with the new VMT performance metric established under SB 743, LADOT also updated its Transportation Assessment Guidelines so as to clearly define the methodologies and impact categories that are required by CEQA from the non-CEQA analyses required to address access, circulation, and safety concerns. Therefore, all references to LADOT's 2016 Transportation Impact Study Guidelines should be updated to reflect LADOT's current Transportation Impact Assessment Guidelines found on LADOT's website: https://ladot.lacity.org/documents/transportation-assessment. RA-6-7

Alternatives 1 and 2

Included in Alternatives 1 and 2 is the proposed closure of Long Beach Avenue and 14th Street in order to construct a grade-separation portal that would accommodate the transition of the project service from an underground operation to an aerial operation. In order to fully disclose the potential effect these proposed closures could have on the surrounding street system, the Transportation Impact Analysis Report (Appendix D of the DEIR) should be expanded to disclose the potential traffic diversion that may occur as a result of these closures. RA-6-8

ALTERNATIVES

Alternative 3

As previously noted, the draft EIR has identified Alternative 3 as the staff preferred alternative for the project; however, as discussed above, the service efficiency of the A Line is already operating under considerable strain, particularly the street running segments along Washington Boulevard and Flower Street. Therefore, it is unclear at this juncture, how the implementation of Alternative 3 can occur without sufficiently addressing current and potential future strain to the A Line operations. Impacting A Line operations would likely present direct impacts on the immediate network, including the E Line, and downstream impacts on the larger transit network. RA-6-9

In 2018, Metro commissioned a traffic analysis titled the Blue / Expo Improvement Project. In this report it was noted that: *"Metro Operations staff has seen the degradation of rail speeds and reliability on the Metro Blue and Exposition (EXPO) lines. Much of the degradation is due to the operation in street running portions of the alignments in downtown Los Angeles, downtown Long Beach, and the operation through the Washington Boulevard Wye. In the two street running alignments, the traffic signal timing and left-turn movements affect the efficiency of operations of the two lines. With the anticipated opening of the Regional Connector, train service on the Blue and Expo lines will increase to headways of every 5 minutes on both branches. The result will be a train every 2.5 minutes in both directions traversing through the Wye. With increased train traffic, strategies to improve operation will be needed."*

The report determined that a number of intersection closures and left-turn restrictions would be required in order to achieve a measurable improvement in the operation of the Washington Boulevard corridor and that the recommended actions would, *"..take some time to implement since closing intersections has an impact to residents, schools, and businesses."*

In a subsequent report dated October 15, 2020, the Metro Board further recommended the continued evaluations of the A (Blue), E (Expo) and L (Gold) Lines to identify *"…locations that most frequently cause delays and/or require schedule padding because of reliability issues, and identify mechanisms to mitigate the identified challenges, including estimates."*

Therefore, based on the 2020 Metro Board Action and the information disclosed in the 2018 Metro study, the WSAB Draft EIR should provide a broader explanation of how the Alternative 3 connection can be implemented without further exacerbating the constraints identified in the 2018 Blue / Expo Improvement Project report. RA-6-10

Alternatives 1 and 2

As described in the draft EIR, Alternatives 1 and 2 would extend the WSAB service into the downtown core via an exclusive rail line north of the A Line Slauson Station. As a result of this direct connection, RA-6-11

the ridership projection for these two alternatives is expected to be significantly greater than the ridership projections for Alternatives 3 and 4. However, in addition to the greater ridership potential, it should also be noted that the exclusive line operation that would be implemented under these two alternatives could also serve to provide some relief to the street running constraints of the A and E Line services identified in the 2018 Metro study. As such, it is LADOT and LACP's recommendation that either Alternative 1 or 2 be selected as the Locally Preferred Alternative (LPA) for this project, even if this approach requires implementation phasing. If implementation phasing is considered by Metro, a priority bus corridor service along the LPA route north of Slauson Avenue could temporarily assist in meeting the core objectives of the WSAB project while Metro continues to pursue funding for a LPA segment that connects to Downtown L.A.

RA-6-11

RA-6-12

RA-6-13

Not selecting Alternatives 1 or 2 could have other ramifications. According to the Measure M Expenditure Plan, the Central City Subregion would provide 37-percent of the total cost of the WSAB. The expenditure plan was meant to equitably divide funding commitments among subregions. Yet Alternative 3 does not include any construction or new services within the Central City Subregion.

RA-6-14

LADOT and LACP support a direct connection to Downtown L.A., the regional hub of employment, housing, commercial, cultural, and educational uses, as well as the confluence of mobility infrastructure, which would better serve existing and future Metro customers and complement the immense growth projected to occur within Downtown. According to Metro's Transit Operations team, as of September 2021, one third of countywide buses pass through Downtown L.A. In the coming decades, as a result of Regional Connector, rail service is expected to improve connectivity in the regional core. Additionally, Downtown L.A. is home to multiple municipal bus lines (including LADOT DASH), Metro Bike Share, Blue LA EV carshare, an expanding protected bike lane network and more. The Mobility Hubs Program is also expected to launch in Downtown L.A. (and two other locations) further expanding mobility services.

RA-6-15

RA-6-16

The Southern California Association of Governments (SCAG) projected that by the year 2040, Downtown L.A. will have 125,000 new residents, 70,000 new housing units, and 55,000 new employees. This represents a tripling of Downtown L.A.'s existing residential population. The Downtown Community Plan was recommended for approval by the Los Angeles City Planning Commission (CPC) on September 23, 2021 and proceeds to Los Angeles City Council as the last step in the adoption process later this year. The Downtown Community Plan proposes a strategy of bold growth by not only accommodating SCAG's regional growth projections, but by also creating additional capacity beyond that for housing and employment - totaling 175,000 new residents, 100,000 new housing units, and 100,000 new employees. Although Downtown L.A. represents just 1-percent of the City's total land area, the proposed Downtown Community Plan will create the capacity to accommodate over 20-percent of the City's total projected household growth. Furthermore, 80-percent of the Downtown Community Plan's anticipated growth is located within one-half mile of a major transit stop - helping our City address climate change goals by reducing VMT and also increasing equitable access to housing, jobs, and services.

RA-6-17

Given Downtown L.A.'s anticipated growth, LADOT is developing the Downtown Los Angeles Mobility Investment Plan (DTLA MIP). The DTLA MIP is a proposed program of the Downtown Community Plan and will develop a priority project list and funding plan for transportation improvements that support equitable and sustainable growth in Downtown L.A. A direct pathway to connect Downtown L.A.'s existing and planned suite of mobility services, along with ever-expanding employment, manufacturing, commercial, and residential uses, would improve overall regional equity and access to opportunity, especially for those served by the West Santa Ana Branch alignment in South and Southeast Los Angeles

RA-6-18

County. Studying this connection would create new opportunities to seek future funding to support the extension of the West Santa Ana Branch into Downtown L.A. to meet regional and state goals of expanding equitable access to jobs and services through sustainable transit connections. RA-6-18

Continued Analysis of Alternatives

LADOT offers to continue collaborating with Metro staff in the next stages of the West Santa Ana Branch project study to assess benefits of the proposed alternatives using LADOT's Connectivity Platform Tool. LADOT's Connectivity Platform measures changes to opportunity as a result of land use and mobility investment decisions. The Connectivity Platform compares door-to-door travel times by various modes of transportation to reach destinations, such as employment sites, schools, grocery stores, and medical centers. Measuring connectivity is aligned with the goals of Senate Bill 743 to maximize people's access while minimizing overall VMT or driving. RA-6-19

CEQA IMPACTS

Construction

As discussed in Section 3.7.3 of the draft EIR, minor impacts to traffic operations associated with the staging/laydown areas and haul routes would occur. All construction trucks would use designated haul routes (as listed in Table 3.50 of the report) to access the freeway system. The construction related traffic volumes would be minimal compared to the overall background traffic volumes and generally occur during off-peak periods when volumes and congestion are lower. In order to address these impacts, the project would include the execution of a construction Transportation Management Plan [TMP (Mitigation Measure TRA-20)] to minimize their effect. It is important that the TMP be developed in early coordination with LADOT staff. RA-6-20

Emergency Access

Since the locally preferred alternative (LPA) has yet to be determined for the project, it is unclear at this juncture if the project would pose a significant impact to emergency access. Therefore, in order to ensure that any potential emergency access issue is fully addressed, LADOT recommends that the Metro team consult with the appropriate City staff, and incorporate any design considerations needed, as part of the final EIR process. RA-6-21

ACCESS/CIRCULATION (NON-CEQA) REQUIREMENTS

Project Design

Alternative 3

As discussed above, based on the information provided in the 2018 Metro Blue/Expo Improvement study, the A Line service operation is already experiencing severe efficiency strain along the street running segments of the service. Therefore, it is unclear how the implementation of Alternative 3 can be introduced to this same service line without further exacerbating this strain. In addition to expanding the EIR discussion on how this potential issue would be addressed, the Metro team should meet with the appropriate LADOT staff to review this potential issue so that an appropriate project design plan can be developed as part of the final EIR process. RA-6-22

Advanced Conceptual Engineering

In October of 2019, LADOT submitted comments to the advanced conceptual plans prepared for the service segment north of the project's Slauson Station and A Line connection (Alternatives 1 and 2). During this discussion, LADOT noted the following: RA-6-23

1) Both Long Beach Avenue and 14th Street are designated Avenue III arterials in the City's Mobility Plan so any street vacation needed to accommodate the proposed below grade to aerial transition alignment design will require a street reclassification filing with City Planning. RA-6-23

2) LADOT may prefer an alternate design plan to the proposed Long Beach Avenue cul-de-sac currently shown in the Advanced Conceptual Engineering so an additional design discussion should be held prior to finalizing this alignment detail. RA-6-24

3) Property acquisitions may need to be considered to minimize alignment impacts. RA-6-25

LADOT continues to recommend that the Metro team consult with the appropriate City staff, and incorporate any design considerations needed, as part of the final EIR process.

Parking Inventory

It should be noted that as part of the project final design process, all proposals for parking removal will require LADOT review and approval. The project should refer to the current publication of LADOT's Transportation Assessment Guidelines for direction regarding the removal of on-street parking and the project's obligation in this regard. Additionally, the Mobility Plan 2035 mitigation monitoring program requires that, prior to project decision, all businesses that may be directly affected by the removal of on-street parking be notified of the project and the potential removal of said parking. RA-6-26

New Traffic Control Measures

It is unclear at this juncture, to what extent new traffic control measures may be needed to facilitate implementation of any of the project Build Alternatives. However, prior to installation, all new traffic control measures have to be reviewed and approved by the appropriate LADOT District Operations staff. Therefore, inasmuch as the determination of this review/approval process can significantly affect the final configuration of the project, a convening with the appropriate LADOT District office will need to be completed in conjunction with the project final design process.

CONCLUSION

LADOT and LACP fully support the purpose of and need for the WSAB project and see it not only as an important regional connectivity enhancement that can help reduce the State's overall greenhouse gas emissions and VMT, but also as a key necessary link in the overall transit network. **However, the WSAB should connect to Union Station or 7th Street/Metro Center Station to offer the greatest benefit to the region and enhance connectivity, as represented in Alternatives 1 and 2.** RA-6-27

In the Measure M Expenditure Plan, a total of $4 billion is identified for the WSAB project. Of this total, 37-percent is specified to be used in the Central City Subregion. However, Alternative 3 does not include any construction within the Central City Subregion. The strain and operational issues that Alternative 3 would cause on the A Line could become a deterrent to use of the WSAB service without substantial investments to the A Line. For these reasons, **Metro should pursue the environmental clearance of Alternatives 1 and 2, then explore other financial opportunities or lower-cost design options to implement a final alignment that would most benefit the region, realize the highest ridership potential, and connect more communities to job destinations and major activity centers.** RA-6-28

As noted previously in the various discussion areas cited above, there still remains a number of access and circulation issues that need to be addressed prior to completing the final design process for the RA-6-29

project. Therefore, in order to ensure the best possible strategy for fully addressing the potential impacts of this project, the WSAB project team should engage LADOT, LACP, and City staff to discuss the various comments provided in this review prior to moving forward with the development of the final environmental impact report. RA-6-29

If you have any questions, please contact LADOT at eddie.guerrero@lacity.org or LACP at valerie.watson@lacity.org.

Sincerely,

Edward Guerrero Jr.

Edward Guerrero Jr.
Senior Transportation Engineer

Valerie Watson

Valerie Watson
Senior City Planner

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Clare Eberle, LADOT Active Transportation
Randall Tanijiri, LADOT Permits and Plan Review
Jose Hernandez, LADOT Parking Meters Division

Los Angeles Department of Transportation and Los Angeles Department of City Planning – RA-6

Comment ID	Response
RA-6-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
RA-6-2	This comment summarizes the commenter's understanding of project information.
RA-6-3	The comment was written prior to the start of Regional Connector service. Operations on the Metro A (Blue) Line have changed with the opening of the Regional Connector. Additionally, Metro continues to monitor operation of the A Line and explore ways to minimize impacts to the operation of the line. The Slauson/A Line Station and WSAB alignment were designed to avoid operational impacts to A Line trains, as the two lines will operate on separate tracks. Additionally, the stations between the two lines will be connected by two pedestrian bridges in order to disperse riders transferring between the lines, thereby minimizing dwell times and impacts to reliability related to the increased transfer activity. As the Slauson/A Line Station is the northern terminus of the LPA, it is not anticipated that the LPA would affect operation of the A Line where the line is street running between the 7th Street and Washington Street stations. The ridership information included in the Final EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Transportation Impact Analysis Report* reflects conditions in the horizon year of 2042, inclusive of changes in the transportation network (including the Regional Connector) and growth in population and employment. The WSAB Project will begin revenue service in 2035. Ridership levels on the A Line at the start of WSAB revenue service would be subject to a number of factors, including headways on both the WSAB and the A Lines, population and employment in the service area, and travel patterns and demand. These variables are subject to change by the start of revenue service compared to current conditions. Additionally, it is unknown to what degree the lingering effects of the COVID pandemic may still affect ridership levels in 2035. Therefore, the potential for WSAB to impact ridership on the A Line such that it would affect the overall performance of that line is unknown and speculative. Metro routinely monitors ridership on lines to determine if passenger loads (defined as the number of passengers per vehicle) during peak periods exceed established thresholds. These thresholds consider the design of the vehicle, including the space available for standing or sitting. If loads are exceeded, Metro identifies means to shift the demand to other transit services (such as by introducing a bus route that parallels the rail line) or to accommodate the demand (for instance, increasing headways). Metro will monitor passenger loads on the A Line after the start of revenue service of WSAB. If the thresholds applicable at that time are exceeded, Metro will identify ways to accommodate the demand to avoid impacts to the operation of the A Line. It should be noted that ridership forecasting conducted by Metro in support of planning for the WSAB Project shows increased ridership for the A Line as a result of opening of the LPA, but the increased peak hour loads fit within the loads standard for the planned A Line service.
RA-6-4	See response CR-GEN-1 regarding identification of the LPA and study of a future extension to LA Union Station, inclusive of Little Tokyo. Although access to jobs, activity centers, and transfer points is informative to the LPA decision, there are other considerations in the identification of the Locally Preferred Alternative (LPA), including cost and satisfying stated project goals.

Comment ID	Response
RA-6-5	In compliance with California Senate Bill 743, an analysis focused on vehicle miles traveled (VMT) was completed for the WSAB Project for purposes of California Environmental Quality Act (CEQA) and documented in Chapter 3, Section 3.6.2 of the Draft EIS/EIR. As discussed in Section 3.6.2, the overall guidance is that transportation projects will have a less than significant project impact if they reduce VMT. Agencies are given "broad discretion" to select the methodology for analysis, or even apply a qualitative approach. The assessment for this CEQA requirement is focused on the forecasted change in VMT with the Project. The Project will have a less than significant impact because VMT will be reduced under both the existing and horizon year scenarios, and mitigation will not be required. Using the regional travel demand model (six-county Southern California Association of Governments region), VMT was assessed for the LPA (evaluated as Alternative 3 in the Draft EIS/EIR). VMT will be reduced with implementation of the LPA, as shown in Table 3.48, in Section 3.6.2.
RA-6-6	Refer to the response to comment RA-6-5. As described in Chapter 3, Section 3.6.1 of the Draft EIS/EIR, the LPA will be consistent with plans, ordinances, and policies addressing the circulation system for transit, roadway, bicycle, and pedestrian facilities, as summarized in Table 3.47. The LPA will not preempt the development and implementation of proposed bicycle paths within the LADOT jurisdiction. Chapter 3, Section 3.6.1 of the Draft EIS/EIR acknowledges the LPA could preempt the future development and implementation of several proposed bicycle paths within the Cities of Huntington Park, Bell, Cudahy, and South Gate, and significant impacts associated with applicable programs, plans, ordinances, or policies will occur. Metro will continue coordination efforts with these cities to minimize potential impacts to the future implementation of the planned bike trails identified in their general plans and/or bike and trail master plans. Mitigation Measure LU-1 (Consistency with Bike Plans) will be effective to maintain continuity in the bike trails within the Cities of Huntington Park, Bell, Cudahy, and South Gate, which will further improve mobility in the four cities so that the Project will be consistent with applicable land use plans and policies. Even with implementation of Mitigation Measure LU-1 (Consistency with Bike Plans), the LPA could result in a significant and unavoidable impact because the process to amend bike plans is a local process, including public participation, and the ultimate outcome and resolution of plan elements cannot be predicted. Therefore, significant and unavoidable impacts will occur, and Mitigation Measure LU-1 (Consistency with Bike Plans) is required. These areas are not within the City of Los Angeles.
RA-6-7	The year 2017 was used for the existing conditions analysis as that was the year the Notice of Preparation was filed, initiating the CEQA process. In that year, LADOT's 2016 Transportation Impact Study Guidelines were the current guidelines. From the guidelines, the Level-of-Service guidelines were applied to complete the traffic operations analysis in the National Environmental Policy Act sections of the Draft and Final EIS/EIR. See response to comment RA-6-3 regarding future operating conditions of the Metro A (Blue) line.
RA-6-8	In January 2022, the Metro Board of Directors identified Alternative 3 as the LPA, but LA Union Station was identified as the ultimate northern terminus for the corridor. Alternative 3 is identified as the LPA in the Final EIS/EIR. The northern terminus for the LPA is the Slauson/A Line Station, and closures of Long Beach Avenue and 14th Street will not occur as part of the LPA. A separate study is being completed to determine cost-effective alignments between LA Union Station and the Slauson/A Line Station, inclusive of a station in Little Tokyo.

Comment ID	Response
RA-6-9	See responses to comments RA-6-3 and RA-6-4 regarding passenger loads on the A Line. No changes to operating plans on other rail lines are proposed with implementation of the LPA. Table 3-15 in Chapter 3 of the Final EIS/EIR presents the change in daily boardings along other Metro lines in 2042. Increases in daily boardings will be under 1 percent for all other Metro lines and will not strain the overall Metro network.
RA-6-10	See response to comment RA-6-3 and RA-6-9.
RA-6-11	Transit trips (ridership) for each of the alternatives discussed in the Draft EIS/EIR are included in Chapter 3, Table 3.20 in the Draft EIS/EIR. As shown in that table, approximately 793,000 daily fixed-guideway trips are projected on Metro in 2042 with the LPA (Alternative 3 in the Draft EIS/EIR). If Alternative 1 or Alternative 2 was to be implemented, that number would be approximately 804,000 or 806,000 trips, respectively. See also response to RA-6-3.
RA-6-12	See response CR-GEN-1 and response to comment RA-6-3. A financially constrained funding plan is currently not available for the extension to LA Union Station north of the Slauson/A Line Station. A separate study is being completed to analyze more cost-effective alignments to reach LA Union Station.
RA-6-13	As part of the study authorized by the Metro Board in January 2022, Metro is identifying potential interim connections for riders seeking to travel between the LPA terminus at the Slauson/A Line Station and LA Union Station. Additionally, riders wishing to travel to downtown LA can also transfer to the A Line at the Slauson/A Line Station.
RA-6-14	Approximately $400 million of the Central Cities' portion of Measure M funds is reserved.
RA-6-15	See response CR-GEN-1 and response to comment RA-6-12. The LPA will serve downtown via transfer at the Slauson/A Line Station to the A Line.
RA-6-16	The comment regarding mobility services in Downtown L.A. is acknowledged.
RA-6-17	See response to comment RA-6-4. As one of Los Angeles's densest population and employment areas, Downtown LA currently has the highest concentration of both fixed guideway and bus transit service in the region and will continue to do so into the future. The WSAB Project will provide new transit access to and from the corridor cities to downtown LA through transfer to the A (Blue) Line.
RA-6-18	See response to comment RA-6-12. Metro recognizes the City of Los Angeles's goals for the *Downtown Los Angeles Mobility Investment Plan* and is interested in coordination for future planning of a transit connection between the Slauson/A Line Station and LA Union Station.
RA-6-19	See response to comment RA-6-18. The Metro Board of Directors identified Alternative 3 as the LPA, but LA Union Station was identified as the ultimate northern terminus of the corridor. VMT will be reduced by the LPA as shown in Table 3.48 in Chapter 3, Section 3.6.2 of the Draft EIS/EIR. Metro will coordinate with LADOT as applicable regarding LADOT's Connectivity Platform Tool as it relates to the Project.
RA-6-20	The development of the Transportation Management Plan(s) will begin during the design phase of the Project with input from the applicable jurisdictional agencies and the plan applied during construction. Metro will coordinate with LADOT as applicable for potential effects to LADOT facilities.

Comment ID	Response
RA-6-21	See response CR-GEN-1. The LPA is Alternative 3 from the Draft EIS/EIR, with refinements made in response to stakeholder coordination and comments on the Draft EIS/EIR. Alternative 3 was identified as the Staff Preferred Alternative in the Draft EIS/EIR. Emergency access was fully evaluated for all alternatives, including Alternative 3, in the Draft EIS/EIR. The analysis was summarized in Chapter 4, Section 4.18.3.2 of the Draft EIS/EIR and in the *West Santa Ana Branch Transit Corridor Project Final Safety and Security Impact Analysis Report* (Appendix F of the Draft EIS/EIR). As stated in Chapter 4, Section 4.18.3.2 under the subheading "Emergency Response Services" in the Draft EIS/EIR, Metro will coordinate with involved fire and police departments to address fire/life safety and security for the proposed alignment, parking facilities, and station areas within their respective jurisdictions. A comprehensive emergency preparedness plan that can be integrated with emergency service providers, local jurisdictional emergency response plans, and Metro's existing emergency procedures will be developed for operation of the Project, as required by FTA. Metro, in coordination with local jurisdictions, will develop traffic management plans to reduce delays in response times for emergency service providers. Gate operations at at-grade crossings will be configured per California Public Utilities Commission standards as part of the Project and the traffic mitigation measures.
RA-6-22	See response to comment RA-6-3 and RA-6-9.
RA-6-23	See response CR-GEN-1 and response to comment RA-6-18. No construction activities will occur north of the Slauson/A Line Station as part of the LPA.
RA-6-24	The LPA will not require the cul-de-sac mentioned in the comment. Metro will coordinate with LADOT regarding design of an extension north of the Slauson/A Line Station at the time such an extension advances.
RA-6-25	See response to comment RA-6-24.
RA-6-26	As identified in Chapter 3, Section 3.4.4.2 of the Final EIS/EIR, implementation of the LPA will require the removal of 15 parking spaces on Long Beach Avenue within the City of Los Angeles. As discussed in Section 5.4.2 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (previously Appendix D of the Draft EIS/EIR), there is sufficient capacity on adjacent streets to accommodate the parking demand, and any circulation on local roads to find parking will be minimal. Additionally, with implementation of Mitigation Measure TRA-22 (Parking Mitigation Program [Permanent]), discussed in Chapter 3, Section 3.5.2.4 of the Draft EIS/EIR, Metro will coordinate with local jurisdictions to address the physical loss of public parking spaces resulting from implementation of the LPA (this measure is referred to as Mitigation Measure TRA-20 (Parking Mitigation Program [Permanent]) in the Final EIS/EIR). This could include, but not be limited to, restriping the existing street to allow for diagonal parking, reducing the number of restricted parking areas, and adjusting the time limits for on-street parking. Metro will coordinate with city staff per an executed Master Cooperative Agreement. The Master Cooperative Agreements provide cities the opportunity to review design packages and provide comments. Chapter 4, Section 4.1.3 of the Draft EIS/EIR also included a discussion of property acquisitions related to land use compatibility. As discussed in this section, property acquisitions will not conflict with other uses in the surrounding area, physically divide an established community, change, or impair the function of surrounding uses, or create new land use incompatibilities.
RA-6-27	See response CR-GEN-1 regarding identification of the LPA. See response CR-GEN-7 regarding Alternative 2. See response to comments RA-6-12 and RA-6-19.
RA-6-28	Refer to the response to comments RA-6-14 and RA-6-18.

Comment ID	Response
RA-6-29	The individual access and circulation comments are addressed individually in the prior responses. Metro continued coordination with partner jurisdictions after circulation of the Draft EIS/EIR in support of the Final EIS/EIR, and the outcome of the coordination is reflected in these responses.

LA Metro (Service Planning)

Metro Service Planning appreciates the opportunity to review and comment on the West Santa Ana Branch EIR/EIS. The following comments are provided below:

• The references to Metro bus service provided in the EIR/EIS is prior to the implementation of NextGen Bus Plan. Two phases have been implemented thus far (December 2020 and June 2021) with the third phase coming up in December 2021. The document should acknowledge that the Metro bus network referenced and analyzed in the EIR/EIS would be different from the new network resulting from the NextGen Bus Plan.
• On Page 1-11: Figure 1.5: The map should include the date the Metro bus network is from along with a disclaimer stating changes for the NextGen Bus Plan have occurred since this map.
• Metro Service Planning is concerned with the deficiency of available bus facilities and its details especially at the Firestone and Pioneer Stations where significant bus services will ideally serve these stations, including lines that may ideally terminate at these stations, maximizing the potential to feed transit riders to/from the rail service
• The following comments are with regards to the Firestone Station:
o Metro has a bus line on Atlantic Avenue, Line 260, which has an existing bus stop on southbound Atlantic Avenue at Firestone Boulevard (nearside). For better connectivity with this bus stop and Line 260, east-west pedestrian crosswalks should be provided at the Atlantic Avenue and Azalea West intersection. RA-11-1
o To improve pedestrian safety and reduce delay, the pedestrian crosswalk should be grade separated from the freight rail tracks.
• The following comments are with regards to the Pioneer Station:
o Metro Service Planning is concerned with the proposed disconnect to 187th Street as this would negatively affect buses being able to turn around effectively to access future bus bays along Pioneer Street. New disconnected street at 188th Street also eliminates opportunities for effective bus turn around to access future bus bays as well. Metro Service Planning recommends further coordination with the West Santa Ana Branch Team to address access to the future bus bays on Pioneer Street.
o Bus operator restrooms should also be available in close proximity to the future bus bays on Pioneer Street.
o Please clarify if there is a pedestrian access to traverse between south and north of the station. With the disconnect of 187th Street brings concern of disconnection between neighborhoods.

Again, Metro Service Planning appreciates the opportunity to review and comment on the West Santa Ana Branch EIR/EIS and looks forward to further coordination with the West Santa Ana Branch Team.

Los Angeles Metro (Service Planning) – RA-11

Comment ID	Response
RA-11-1	Metro has coordinated internally with its departments and all comments have been considered in project development. Existing conditions information in the Draft and Final EIS/EIR is noted as representing 2017, which was the date the Notice of Preparation was filed, unless otherwise noted. The analysis also considered a 2042 horizon year, which was based on the transportation network as identified in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. Text has been modified where applicable in the Final EIS/EIR to clarify the date of existing conditions. Detailed design of each station, including configuration of bus transfer areas, will be refined as design advances and prior to the start of revenue service. Additionally, Metro will undertake a bus-rail interface study prior to the start of revenue service to determine if adjustments are needed to existing or planned bus routes to align with the service provided by the new rail transit line.

Metropolitan Water District of Southern California

From: Marks,Alexander S <AMarks@mwdh2o.com>
Sent: Tuesday, September 28, 2021 5:26:29 PM
To: WSAB <WSAB@metro.net>
Cc: Carlson,Sean A <SCarlson@mwdh2o.com>; Ditmar,Jolene M <JDitmar@mwdh2o.com>; Flores,Francisco <FFlores@mwdh2o.com>; Fong,David R <DFong@mwdh2o.com>; Khanna, Meghna <KhannaM@metro.net>
Subject: West Santa Ana Branch Transit Corridor Project DEIR/DEIS - Metropolitan Water District of Southern California Comment Letter

Please find additional comments from the Metropolitan Water District of Southern California on the West Santa Ana Branch Transit Corridor Project DEIR/DIER attached. RA-1-1

Thank you,

Alex Marks, AICP
Environmental Specialist
The Metropolitan Water District
(213) 217-7629

EPS Environmental Planning Section

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

September 28, 2021 **VIA EMAIL**

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

Dear Ms. Khanna:

Additional Comments to the Notice of Availability and Draft Environmental Impact Report/Environmental Impact Statement for the West Santa Ana Branch Transit Corridor

On August 27, 2021, the Metropolitan Water District of Southern California (Metropolitan) provided comments as a potentially affected public agency to the Notice of Availability and Draft Environmental Impact Report/Environmental Impact Statement for the proposed West Santa Ana Branch Transit Corridor (WSABTC). This letter contains additional comments regarding the proposed project's potential to impact six Metropolitan pipelines and Metropolitan's Headquarters facility at Union Station. Please find our August correspondence and "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way" referenced in that letter attached. RA-1-2

1. Metropolitan's pipelines were not designed to withstand loading from railways and rail cars, and must be protected in place during both construction and operation of the WSABTC. Therefore, prior to construction, structural calculations and details showing no adverse impacts will need to be provided to Metropolitan where the proposed rail lines would cross over the pipeline's identified in our August correspondence. RA-1-3

2. Construction of the WSABTC must not impose excessive unbalanced loads on Metropolitan's pipelines. Therefore, prior to construction, the specifications of construction equipment to be used for the removal, placement, and compaction of soil and pavement will need to be submitted to Metropolitan prior to construction of the WSABTC in the vicinity of our pipelines. RA-1-4

3. Construction of the WSABTC cannot subject Metropolitan's pipelines to excessive vehicle, impact, or vibratory loads. No vibratory equipment in vibratory mode must be used within 25 feet of the centerline of our pipelines. The specifications of any construction equipment over AASHTO H-20 loading to be used in the area of our pipelines must be submitted to Metropolitan prior to construction of the WSABTC. The RA-1-5

list should include a description of the equipment, and the year, make, and model number. RA-1-5

4. Material stockpiling and construction vehicle parking is not permitted over Metropolitan's pipelines or rights-of-way. RA-1-6

5. Metropolitan's pipelines must be potholed to determine their precise location and elevation prior to construction of the WSABTC starting. A Metropolitan representative must be present during the potholing operation and will assist in locating the pipelines. A minimum two working days advance notice prior to any potholing activity is required. Therefore, we request that the plans and/or specifications include a requirement that Kevin Johansen of our Water System Operations Group at (562) 713-0348 be notified at least two working days (Monday through Thursday) before starting any work in the vicinity of our facilities. RA-1-7

6. In the event that Alternative 1 is selected as the preferred project alternative, appropriate land rights would need to be obtained from Metropolitan for work located within our fee property. Such rights may be subject to Metropolitan's Board of Directors approval. Please contact Kevin Webb of our Real Property and Development and Management Group, by telephone at (213) 217-6909, concerning this matter. An application for use of our fee property can be found at the following: https://www.mwdh2o.com/media/17781/471_land_use_request_form_revised.pdf. RA-1-8

We appreciate the opportunity to provide input to your planning process, and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Ms. Jolene Ditmar at (213) 217-6184.

Very truly yours,

DocuSigned by:
Sean Carlson
A67ED56B82914E6...

Sean Carlson
Team Manager, Environmental Planning Section

JD:ds
SharePoint\SharePoint\Metro West Santa Ana Branch Transit Corridor Comment Letter

Enclosures:

(1) August 27, 2021 Correspondence and Map
(2) Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

August 25, 2021 **VIA E-MAIL**

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

Dear Ms. Khanna:

Review of the Notice of Availability and Draft Environmental Impact Report/Environmental Impact Statement for the West Santa Ana Branch Transit Corridor

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Availability and Draft Environmental Impact Report/Environmental Impact Statement for the West Santa Ana Branch Transit Corridor. The Project is a proposed light rail transit system that would extend from four possible northern termini in downtown Los Angeles through southeast Los Angeles County to a southern terminus in the City of Artesia. Four Build Alternatives have been identified with a range of options for each alternative and traverse the cities of Artesia, Bell, Bellflower, Bell Gardens, Cudahy, Downey, Huntington Park, Lakewood, Los Angeles, Maywood, Paramount, South Gate, and Vernon. The Los Angeles Union Station (LAUS) Forecourt would serve as the northern terminus under Alternative 1. The underground station box would be located west of LAUS, under the LAUS Forecourt driveway. The station would be accessed through an entrance from Alameda Street. A second entrance would be provided through an approximately 500-foot long pedestrian tunnel from the LAUS Forecourt Station to the existing Metro lines within Union Station. The Project Study Area encompasses an approximately two-mile buffer for the Project's proposed alignments. The Los Angeles Metropolitan Transportation Authority (Metro) is the CEQA Lead Agency and the Federal Transit Administration (FTA) is the NEPA Lead Agency. This letter contains Metropolitan's comments as a potentially affected public agency.

RA-1-9

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies, serving approximately 19 million people in portions of six counties in Southern California, including Los Angeles County. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. Metropolitan owns and operates six pipelines within the Project Study Area.

RA-1-10

Metropolitan's Palos Verdes Feeder is a 51-inch-inside-diameter pipeline. The Palos Verdes Feeder originates from a Metropolitan facility in the community of Eagle Rock in the City of Los Angeles and transports treated water to the Palos Verdes Reservoir in the City of Rolling Hills Estates. The Palos Verdes Feeder within the Study Area runs in a north-south direction through East and South Los Angeles.

The Middle Feeder South is a 72-inch-inside-diameter, treated water pipeline that originates from Metropolitan's Garvey Reservoir in the city of Monterey Park and connects with Metropolitan's Victoria Street Lateral pipeline in the city of Compton. The Middle Feeder South generally parallels the east side of Interstate Route 710 through the Study Area.

The Middle Cross Feeder is a 78-inch-inside-diameter, treated water pipeline that originates from a junction with Metropolitan's Middle Feeder South in the city of South Gate and connects with Metropolitan's Inglewood Lateral pipeline near the intersection of South Figueroa Street and West 92nd Street in the city of Los Angeles. The Middle Cross Feeder runs in an east-west direction, generally below East 91st Street through the Study Area.

The West Coast Feeder is a 66-inch-inside-diameter, treated water pipeline that originates from a junction with Metropolitan's Lower Feeder in the city of Downey and terminates near the intersection of East El Segundo Boulevard and Aviation Boulevard in the city of Hawthorne. The West Coast Feeder runs in an east-west direction, generally below East El Segundo Boulevard through the Study Area.

RA-1-10

The Lower Feeder is a 78-inch-inside-diameter, treated water pipeline that originates from Metropolitan's Robert B. Diemer Water Treatment Plant in the city of Yorba Linda and connects with Metropolitan's Middle Feeder South and Middle Cross Feeder in the City of South Gate. The Lower Feeder runs in an east-west direction, generally below Stewart and Grey Road in the Study Area.

The South Coast Feeder is a 48-inch-inside-diameter, treated water pipeline that originates from a junction with Metropolitan's Lower Feeder in the city of Downey and terminates near the intersection of Wardlow Street and Woodruff Avenue in the city of Long Beach. The South Coast Feeder runs in a north-south direction, generally below Woodruff Avenue through the Study Area.

Additionally, Metropolitan's Headquarters facility is located directly adjacent to the Union Station complex. Metropolitan's Headquarters facility was constructed in 1997 and is the reporting location for approximately 900 Metropolitan employees. The Headquarters facility is located on Metropolitan fee-owned property. Metropolitan also holds several permanent easements surrounding LAUS for pedestrian and vehicular access including at the main Union Station entrance from Alameda Street.

Based on a review of the proposed Project, there is the potential to impact six Metropolitan pipelines and the Metropolitan Headquarters facility. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to its facilities in order to maintain and repair its system. In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not permit procedures that could subject the pipeline to excessive vehicle, impact or vibratory loads. Any future design plans associated with this project should be submitted to the attention of Metropolitan's Substructures Team. Approval of the project should be contingent on Metropolitan's approval of design plans for portions of the proposed project that could impact its facilities.

RA-1-11

RA-1-12

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-7663. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have a link to the "Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way" at http://www.mwdh2o.com/PDF_Doing_Your_Business/4.7.1_Guidelines_development.pdf. Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

RA-1-13

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation and plans for this project. For further assistance, please contact Ms. Michelle Morrison at (213) 217-7906.

Very truly yours,

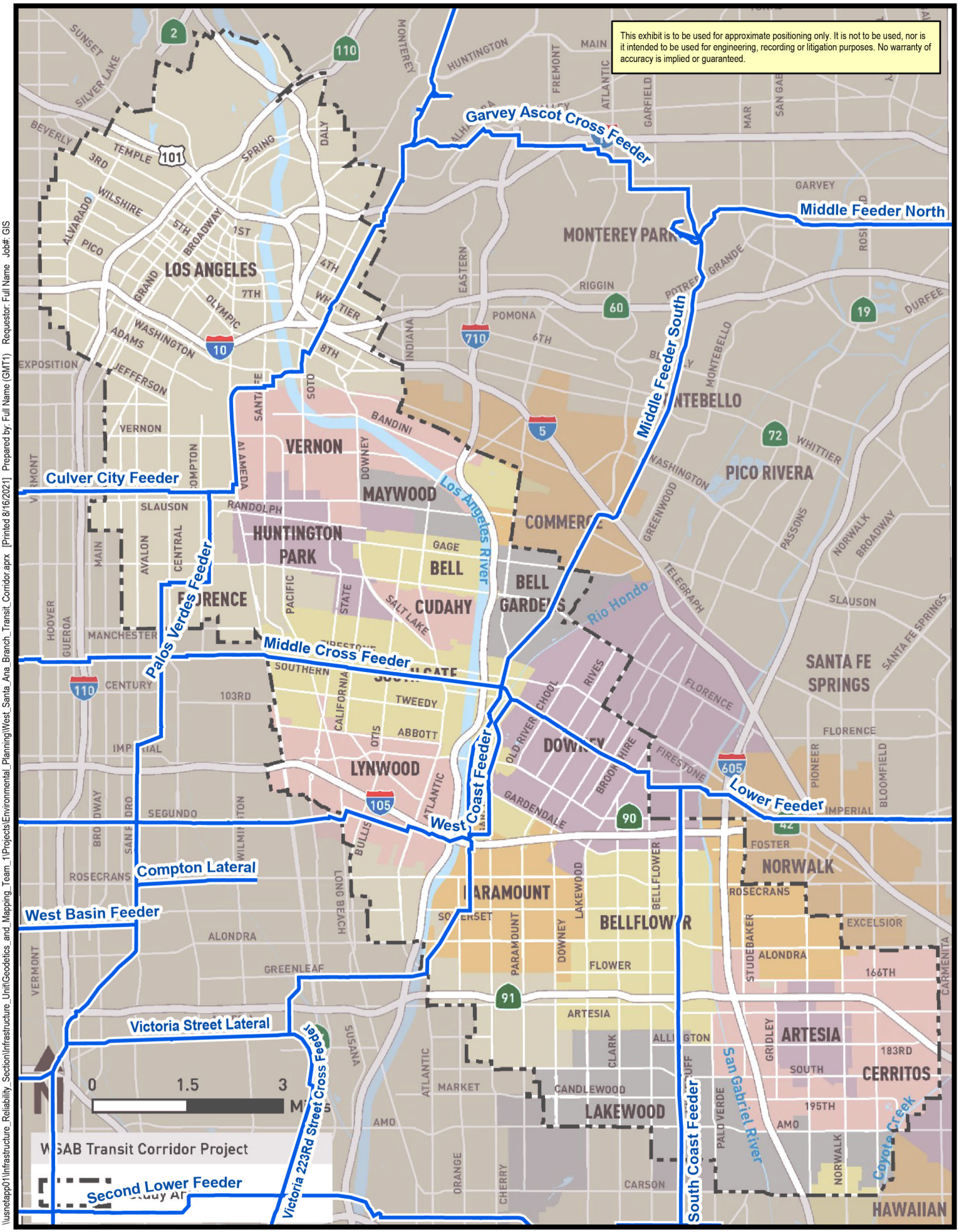
DocuSigned by:
Sean Carlson
A67ED56B82914E6...

Sean Carlson
Team Manager, Environmental Planning Section

MM:ds
SharePoint\Metro West Santa Ana Branch Transit Corridor Comment Letter

Enclosures:

(1) MWD System-West Santa Ana Branch Study Area Map
(2) MWD System-West Santa Ana Branch Alternatives Map
(3) MWD HQ Right of Way-West Santa Ana Branch Forecourt Station Map



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The Metropolitan Water District of Southern California
Engineering Services Group

MWD System
West Santa Ana Branch Study Area

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The Metropolitan Water District of Southern California
Engineering Services Group

MWD System

West Santa Ana Branch Alternatives

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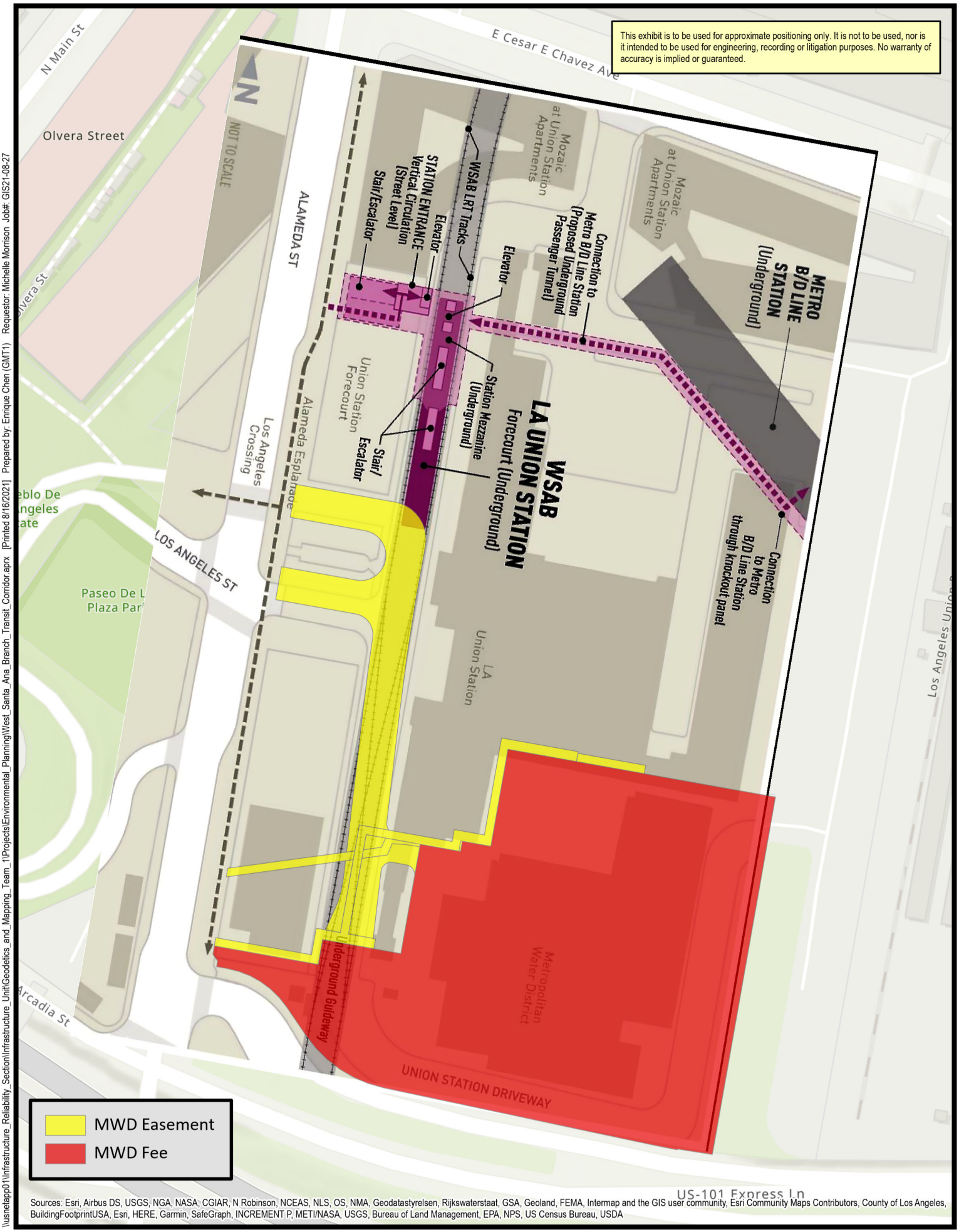

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The Metropolitan Water District of Southern California
Engineering Services Group

MWD HQ Right of Way

West Santa Ana Branch Forecourt Station

0 50 100 200

Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way

July 2018

Prepared By:
The Metropolitan Water District of Southern California
Substructures Team, Engineering Services
700 North Alameda Street
Los Angeles, California 90012

Additional Copies: To obtain a copy of this document, please contact the Engineering Services Group, Substructures Team.

Disclaimer

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as deemed prudent, to assure that project plans are correct. The appropriate representative from Metropolitan must be contacted at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

PUBLICATION HISTORY:

Initial Release	*July 2018*

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1.0 GENERAL INFORMATION

Note: Underground Service Alert at 811 must be notified at least two working days before excavating in proximity to Metropolitan's facilities.

1.1 Introduction

These guidelines provide minimum design and construction requirements for any utilities, facilities, developments, and improvements, or any other projects or activities, proposed in or near Metropolitan Water District of Southern California (Metropolitan) facilities and rights-of-way. Additional conditions and stipulations may also be required depending on project and site specific conditions. Any adverse impacts to Metropolitan's conveyance system, as determined by Metropolitan, will need to be mitigated to its satisfaction.

All improvements and activities must be designed so as to allow for removal or relocation at builder or developer expense, as set forth in the paramount rights provisions of Section 20.0. Metropolitan shall not be responsible for repair or replacement of improvements, landscaping or vegetation in the event Metropolitan exercises its paramount rights powers.

1.2 Submittal and Review of Project Plans/Utilities and Maps

Metropolitan requires project plans/utilities be submitted for all proposed activities that may impact Metropolitan's facilities or rights-of-way. Project plans shall include copies of all pertinent utilities, sewer line, storm drain, street improvement, grading, site development, landscaping, irrigation and other plans, all tract and parcel maps, and all necessary state and federal environmental documentation. Metropolitan will review the project plans and provide written approval, as it pertains to Metropolitan's facilities and rights-of-way. Written approval from Metropolitan must be obtained, prior to the start of any activity or construction in the area of Metropolitan's facilities or rights-of-way. Once complete project plans and supporting documents are submitted to Metropolitan, it generally takes 30 days to review and to prepare a detailed written response. Complex engineering plans that have the potential for significant impacts on Metropolitan's facilities or rights-of-way may require a longer review time.

Project plans, maps, or any other information should be submitted to Metropolitan's Substructures Team at the following mailing address:

Attn: Substructures Team
The Metropolitan Water District of Southern California
700 North Alameda St.
Los Angeles, CA 90012

General Mailing Address: P.O. Box 54153
Los Angeles, CA 90054-0153

Email: EngineeringSubstructures@mwdh2o.com

For additional information, or to request prints of detailed drawings for Metropolitan's facilities and rights-of-way, please contact Metropolitan's Substructures Team at 213-217-7663 or EngineeringSubstructures@mwdh2o.com.

1.3 Identification of Metropolitan's Facilities and Rights-of-Way

Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's, with official recording data, on the following:

A. All applicable plans

B. All applicable tract and parcel maps

Metropolitan's rights-of-ways and existing survey monuments must be tied dimensionally to the tract or parcel boundaries. Metropolitan's Records of Survey must be referenced on the tract and parcel maps with the appropriate Book and Page.

2.0 General Requirements

2.1 Vehicular Access

Metropolitan must have vehicular access along its rights-of-way at all times for routine inspection, patrolling, operations, and maintenance of its facilities and construction activities. All proposed improvements and activities must be designed so as to accommodate such vehicular access.

2.2 Fences

Fences installed across Metropolitan's rights-of-way must include a 16-foot-wide gate to accommodate vehicular access by Metropolitan. Additionally, gates may be required at other specified locations to prevent unauthorized entry into Metropolitan's rights-of-way.

All gates must accommodate a Metropolitan lock or Knox-Box with override switch to allow Metropolitan unrestricted access. There should be a minimum 20-foot setback for gates from the street at the driveway approach. The setback is necessary to allow Metropolitan vehicles to safely pull off the road prior to opening the gate.

2.3 Driveways and Ramps

Construction of 16-foot-wide commercial-type driveway approaches is required on both sides of all streets that cross Metropolitan's rights-of-way. Access ramps, if necessary, must be a minimum of 16 feet wide.

There should be a minimum 20-foot setback for gates from the street at the driveway approach. Grades of ramps and access roads must not exceed 10 percent; if the slope of an access ramp or road must exceed 10 percent due to topography, then the ramp or road must be paved.

2.4 Walks, Bike Paths, and Trails

All walkways, bike paths, and trails along Metropolitan's rights-of-way must be a minimum 12-foot wide and have a 50-foot or greater radius on all horizontal curves if also used as Metropolitan's access roads. Metropolitan's access routes, including all walks and drainage facilities crossing the access routes, must be constructed to American Association of State Highway and Transportation Officials (AASHTO) H-20 loading standards (see Figure 1). Additional requirements will be placed on equestrian trails to protect the water quality of Metropolitan's pipelines and facilities.

2.5 Clear Zones

A 20-foot-wide clear zone is required to be maintained around Metropolitan's manholes and other above-ground facilities to accommodate vehicular access and maintenance. The clear zone should slope away from Metropolitan's facilities on a grade not to exceed 2 percent.

2.6 Slopes

Cut or fill slopes proposed within Metropolitan's rights-of-way must not exceed 10 percent. The proposed grade must not worsen the existing condition. This restriction is required to facilitate Metropolitan use of construction and maintenance equipment and allow uninhibited access to above-ground and below-ground facilities.

2.7 Structures

Construction of structures of any type is not allowed within the limits of Metropolitan's rights-of-way to avoid interference with the operation and maintenance of Metropolitan's facilities and possible construction of future facilities.

Footings and roof eaves of any proposed buildings adjacent to Metropolitan's rights-of-way must meet the following criteria:

A. Footings and roof eaves must not encroach onto Metropolitan's rights-of-way.

B. Footings must not impose any additional loading on Metropolitan's facilities.

C. Roof eaves must not overhang onto Metropolitan's rights-of-way.

Detailed plans of footings and roof eaves adjacent to Metropolitan's rights-of-way must be submitted for Metropolitan's review and written approval, as pertains to Metropolitan's facilities.

2.8 Protection of Metropolitan Facilities

Metropolitan facilities within its rights-of-way, including pipelines, structures, manholes, survey monuments, etc., must be protected from damage by the project proponent or property owner, at no expense to Metropolitan. The exact location, description and method of protection must be shown on the project plans.

2.9 Potholing of Metropolitan Pipelines

Metropolitan's pipelines must be potholed in advance, if the vertical clearance between a proposed utility and Metropolitan's pipeline is indicated to be 4 feet or less. A Metropolitan representative must be present during the potholing operation and will assist in locating the pipeline. Notice is required, a minimum of three working days, prior to any potholing activity.

2.10 Jacked Casings or Tunnels

A. General Requirements

Utility crossings installed by jacking, or in a jacked casing or tunnel under/over a Metropolitan pipeline, must have at least 3 feet of vertical clearance between the outside diameter of the pipelines and the jacked pipe, casing, or tunnel. The actual

cover over Metropolitan's pipeline shall be determined by potholing, under Metropolitan's supervision.

Utilities installed in a jacked casing or tunnel must have the annular space between the utility and the jacked casing or tunnel filled with grout. Provisions must be made for grouting any voids around the exterior of the jacked pipe, casing, or tunnel.

B. Jacking or Tunneling Procedures

Detailed jacking, tunneling, or directional boring procedures must be submitted to Metropolitan for review and approval. The procedures must cover all aspects of operation, including, but not limited to, dewatering, ground control, alignment control, and grouting pressure. The submittal must also include procedures to be used to control sloughing, running, or wet ground, if encountered. A minimum 10-foot clearance must be maintained between the face of the tunneling or receiving pits and outside edges of Metropolitan's facility.

C. Shoring

Detailed drawings of shoring for jacking or receiving pits must be submitted to Metropolitan for review and written-approval. (See Section 10 for shoring requirements).

D. Temporary Support

Temporary support of Metropolitan's pipelines may be required when a utility crosses under a Metropolitan pipeline and is installed by means of an open trench. Plans for temporary support must be reviewed and approved in writing by Metropolitan. (See Section 11, Supports of Metropolitan Facilities).

3.0 Landscaping

3.1 Plans

All landscape plans must show the location and limits of Metropolitan's right-of-way and the location and size of Metropolitan's pipeline and related facilities therein. All landscaping and vegetation shall be subject to removal without notice, as may be required by Metropolitan for ongoing maintenance, access, repair, and construction activities. Metropolitan will not be financially responsible for the removal of any landscaping and vegetation.

3.2 Drought-Tolerant Native and California Friendly Plants

Metropolitan recommends use of drought-tolerant native and California Friendly® plants (excluding sensitive plants) on proposed projects. For more information regarding California Friendly® plants refer to www.bewaterwise.com.

3.3 Trees

Trees are generally prohibited within Metropolitan's rights-of-way as they restrict Metropolitan's ability to operate, maintain and/or install new pipeline(s) located within these rights-of-way. Metropolitan will not be financially responsible for the removal and replacement of any existing trees should they interfere with access and any current or future Metropolitan project located within the right-of-way.

3.4 Other Vegetation

Shrubs, bushes, vines, and groundcover are generally allowed within Metropolitan's rights-of-way. Larger shrubs are not allowed on Metropolitan fee properties; however, they may be allowed within its easements if planted no closer than 15 feet from the outside edges of existing or future Metropolitan facilities. Only groundcover is allowed to be planted directly over Metropolitan pipeline, turf blocks or similar is recommended to accommodate our utility vehicle access. Metropolitan will not be financially responsible for the removal and replacement of the vegetation should it interfere with access and any current or future Metropolitan project.

3.5 Irrigation

Irrigation systems are acceptable within Metropolitan's rights-of-way, provided valves and controllers are located near the edges of the right-of-way and do not interfere with Metropolitan vehicular access. A shutoff valve should also be located along the edge of the right-of-way that will allow the shutdown of the system within the right-of-way should Metropolitan need to do any excavation. No pooling or saturation of water above Metropolitan's pipeline and right-of-way is allowed. Additional restrictions apply to non-potable water such as Recycled Water and are covered on Table 3 of Page 20.

3.6 Metropolitan Vehicular Access

Landscape plans must show Metropolitan vehicular access to Metropolitan's facilities and rights-of-way and must be maintained by the property owner or manager or homeowners association at all times. Walkways, bike paths, and trails within Metropolitan's rights-of-way may be used as Metropolitan access routes. (See Section 2.4, Walks, Bike Paths, and Trails).

4.0 General Utilities

Note: For non-potable piping like sewer, hazardous fluid, storm drain, disinfected tertiary recycled water and recycled water irrigation see Table 1 through Table 3.

4.1 Utility Structures

Permanent utility structures (e.g., manholes, power poles, pull boxes, electrical vaults, etc.) are not allowed within Metropolitan's rights-of-way. Metropolitan requests that all permanent utility structures within public streets be placed as far from its pipelines and facilities as practical, but not closer than 5 feet from the outside edges of Metropolitan facilities.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation.

4.2 Utility Crossings

Metropolitan requests a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and any utility crossing the pipeline. Utility lines crossing Metropolitan's pipelines must be as perpendicular to the pipeline as possible. Cross-section drawings, showing proposed locations and elevations of utility lines and locations of Metropolitan's pipelines and limits of rights-of-way, must be submitted with utility plans, for all

crossings. Metropolitan's pipeline must be potholed under Metropolitan's supervision at the crossings (See Section 2.9).

4.3 Longitudinal Utilities

Installation of longitudinal utilities is generally not allowed along Metropolitan's rights-of-way. Within public streets, Metropolitan requests that all utilities parallel to Metropolitan's pipelines and appurtenant structures (facilities) be located as far from the facilities as possible, with a minimum clearance of 5 feet from the outside edges of the pipeline.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation (for more information See Table 1 on Page 18).

4.4 Underground Electrical Lines

Underground electrical conduits (110 volts or greater) which cross a Metropolitan's pipeline must have a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and the electrical lines. Longitudinal electrical lines, including pull boxes and vaults, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipeline or structures.

4.5 Fiber Optic Lines

Fiber optic lines installed by directional boring require a minimum of 3 feet of vertical clearance when boring is over Metropolitan's pipelines and a minimum of 5 feet of vertical clearance when boring is under Metropolitan's pipelines. Longitudinal fiber optic lines, including pull boxes, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipelines or structures. Potholing must be performed, under Metropolitan's supervision, to verify the vertical clearances are maintained.

4.6 Overhead Electrical and Telephone Lines

Overhead electrical and telephone lines, where they cross Metropolitan's rights-of-way, must have a minimum 35 feet of clearance, as measured from the ground to the lowest point of the overhead line. Overhead electrical lines poles must be located at least 30 feet laterally from the edges of Metropolitan's facilities or outside Metropolitan's right-of-way, whichever is greater.

Longitudinal overhead electrical and or telephone lines in public streets should have a minimum separation of 10 feet from the edge of a Metropolitan pipelines or structures where possible.

4.7 Sewage Disposal Systems

Sewage disposal systems, including leach lines and septic tanks, must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or the edge of its facilities, whichever is greater. If soil conditions are poor, or other adverse site-specific conditions exist, a minimum distance of 150 feet is required. They must also comply with local and state health code requirements as they relate to sewage disposal systems in proximity to major drinking water supply pipelines.

4.8 Underground Tanks

Underground tanks containing hazardous materials must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or edge of its facilities, whichever is greater. In addition, groundwater flow should be considered with the placement of underground tanks down-gradient of Metropolitan's facilities.

5.0 Specific Utilities: Non-Potable Utility Pipelines

In addition to Metropolitan's general requirements, installation of non-potable utility pipelines (e.g., storm drains, sewers, and hazardous fluids pipelines) in Metropolitan's rights-of-way and public street rights-of-way must also conform to the State Water Resources Control Board's Division of Drinking Water (DDW) regulation (Waterworks Standards) and guidance for separation of water mains and non-potable pipelines and to applicable local county health code requirements. Written approval is required from DDW for the implementation of alternatives to the Waterworks Standards and, effective December 14, 2017, requests for alternatives to the Waterworks Standards must include information consistent with: DDW's Waterworks Standards Main Separation Alternative Request Checklist.

In addition to the following general guidelines, further review of the proposed project must be evaluated by Metropolitan and requirements may vary based on site specific conditions.

A. Sanitary Sewer and Hazardous Fluids (General Guideline See Table 1 on Page 18)

B. Storm Drain and Recycled Water (General Guideline See Table 2 on Page 19)

C. Irrigation with Recycled Water (General Guideline See Table 3 on Page 20)

D. Metropolitan generally does not allow Irrigation with recycled water to be applied directly above its treated water pipelines

E. Metropolitan requests copies of project correspondence with regulating agencies (e.g., Regional Water Quality Control Board, DDW); regarding the application of recycled water for all projects located on Metropolitan's rights-of-way

6.0 Cathodic Protection/Electrolysis Test Stations

6.1 Metropolitan Cathodic Protection

Metropolitan's existing cathodic protection facilities in the vicinity of any proposed work must be identified prior to any grading or excavation. The exact location, description, and type of protection must be shown on all project plans. Please contact Metropolitan for the location of its cathodic protection stations.

6.2 Review of Cathodic Protection Systems

Metropolitan must review any proposed installation of impressed-current cathodic protection systems on pipelines crossing or paralleling Metropolitan's pipelines to determine any potential conflicts with Metropolitan's existing cathodic protection system.

7.0 Drainage

7.1 Drainage Changes Affecting Metropolitan Rights-of-Way

Changes to existing drainage that could affect Metropolitan's rights-of-way require Metropolitan's approval. The project proponent must provide acceptable solutions to ensure Metropolitan's rights-of-way are not negatively affected by changes in the drainage conditions. Plans showing the changes, with a copy of a supporting hydrology report and hydraulic calculations, must be submitted to Metropolitan for review and approval. Long term maintenance of any proposed drainage facilities must be the responsibility of the project proponent, City, County, homeowner's association, etc., with a clear understanding of where this responsibility lies. If drainage must be discharged across Metropolitan's rights-of-way, it must be carried across by closed conduit or lined open channel and must be shown on the plans.

7.2 Metropolitan's Blowoff and Pumpwell Structures

Any changes to the existing local watercourse systems will need to be designed to accommodate Metropolitan's blowoff and pumpwell structures, which periodically convey discharged water from Metropolitan's blowoff and pumping well structures during pipeline dewatering. The project proponents' plans should include details of how these discharges are accommodated within the proposed development and must be submitted to Metropolitan for review and approval. Any blowoff discharge lines impacted must be modified accordingly at the expense of the project proponent.

8.0 Grading and Settlement

8.1 Changes in Cover over Metropolitan Pipelines

The existing cover over Metropolitan's pipelines must be maintained unless Metropolitan determines that proposed changes in grade and cover do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance capability. Load and settlement or rebound due to change in cover over a Metropolitan pipeline or ground in the area of Metropolitan's rights-of-way will be factors considered by Metropolitan during project review.

In general, the minimum cover over a Metropolitan pipeline is 4 feet and the maximum cover varies per different pipeline. Any changes to the existing grade may require that Metropolitan's pipeline be potholed under Metropolitan's supervision to verify the existing cover.

8.2 Settlement

Any changes to the existing topography in the area of Metropolitan's pipeline or right-of-way that result in significant settlement or lateral displacement of Metropolitan's pipelines are not acceptable. Metropolitan may require submittal of a soils report showing the predicted settlement of the pipeline at 10-foot intervals for review. The data must be carried past the point of zero change in each direction and the actual size and varying depth of the fill must be considered when determining the settlement. Possible settlement due to soil collapse, rebound and lateral displacement must also be included.

In general, the typical maximum allowed deflection for Metropolitan's pipelines must not exceed a deflection of 1/4-inch for every 100 feet of pipe length. Metropolitan may require additional information per its Geotechnical Guidelines. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

9.0 Construction Equipment

9.1 Review of Proposed Equipment

Use of equipment across or adjacent to Metropolitan's facilities is subject to prior review and written approval by Metropolitan. Excavation, backfill, and other work in the vicinity of Metropolitan's facilities must be performed only by methods and with equipment approved by Metropolitan. A list of all equipment to be used must be submitted to Metropolitan a minimum of 30 days before the start of work.

A. For equipment operating within paved public roadways, equipment that imposes loads not greater than that of an AASHTO H-20 vehicle (see Figure 1 on Page 21) may operate across or adjacent to Metropolitan's pipelines provided the equipment operates in non-vibratory mode and the road remains continuously paved.

B. For equipment operating within unpaved public roadways, when the total cover over Metropolitan's pipeline is 10 feet or greater, equipment imposing loads no greater than those imposed by an AASHTO H-20 vehicle may operate over or adjacent to the pipeline provided the equipment is operated in non-vibratory mode. For crossings, vehicle path shall be maintained in a smooth condition, with no breaks in grade for 3 vehicle lengths on each side of the pipeline.

9.2 Equipment Restrictions

In general, no equipment may be used closer than 20 feet from all Metropolitan above-ground structures. The area around the structures should be flagged to prevent equipment encroaching into this zone.

9.3 Vibratory Compaction Equipment

Vibratory compaction equipment may not be used in vibratory mode within 20 feet of the edge of Metropolitan's pipelines.

9.4 Equipment Descriptions

The following information/specifications for each piece of equipment should be included on the list:

A. A description of the equipment, including the type, manufacturer, model year, and model number. For example, wheel tractor-scraper, 1990 Caterpillar 627E.

B. The empty and loaded total weight and the corresponding weight distribution. If equipment will be used empty only, it should be clearly stated.

C. The wheel base (for each axle), tread width (for each axle), and tire footprint (width and length) or the track ground contact (width and length), and track gauge (center to center of track).

10.0 Excavations Close to Metropolitan Facilities

10.1 Shoring Design Submittal

Excavation that impacts Metropolitan's facilities requires that the contractor submit an engineered shoring design to Metropolitan for review and acceptance a minimum of 30 days before the scheduled start of excavation. Excavation may not begin until the shoring design is accepted in writing by Metropolitan.

Shoring design submittals must include all required trenches, pits, and tunnel or jacking operations and related calculations. Before starting the shoring design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements, particularly as to any special procedures that may be required.

10.2 Shoring Design Requirements

Shoring design submittals must be stamped and signed by a California registered civil or structural engineer. The following requirements apply:

A. The submitted shoring must provide appropriate support for soil adjacent to and under Metropolitan's facilities.

B. Shoring submittals must include detailed procedures for the installation and removal of the shoring.

C. Design calculations must follow the Title 8, Chapter 4, Article 6 of the California Code of Regulations (CCR) guidelines. Accepted methods of analysis must be used.

D. Loads must be in accordance with the CCR guidelines or a soils report by a geotechnical consultant.

E. All members must be secured to prevent sliding, falling, or kickouts.

Metropolitan's pipelines must be located by potholing under Metropolitan's supervision before the beginning construction. Use of driven piles within 20 feet of the centerline of Metropolitan's pipeline is not allowed. Piles installed in drilled holes must have a minimum 2-foot clearance between Metropolitan's pipeline and the edge of the drilled hole, and a minimum of 1-foot clearance between any part of the shoring and Metropolitan's pipeline.

11.0 Support of Metropolitan Facilities

11.1 Support Design Submittal

If temporary support of a Metropolitan facility is required, the contractor shall submit a support design plan to Metropolitan for review and approval a minimum of 30 days before the scheduled start of work. Work may not begin until the support design is approved in writing by Metropolitan. Before starting design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements.

11.2 Support Design Requirements

Support design submittals must be prepared, stamped, and signed by a California registered civil or structural engineer. The following requirements apply:

A. Support drawings must include detailed procedures for the installation and removal of the support system.

B. Design calculations must follow accepted practices, and accepted methods of analysis must be used.

C. Support designs must show uniform support of Metropolitan's facilities with minimal deflection.

D. The total weight of the facility must be transferred to the support system before supporting soil is fully excavated.

E. All members must be secured to prevent sliding, falling, or kickouts.

12.0 Backfill

12.1 Metropolitan Pipeline Not Supported

In areas where a portion of Metropolitan pipeline is not supported during construction, the backfill under and to an elevation of 6 inches above the top of the pipeline must be one-sack minimum cement sand slurry. To prevent adhesion of the slurry to Metropolitan's pipeline, a minimum 6-mil-thick layer of polyethylene sheeting or similar approved sheeting must be placed between the concrete support and the pipeline.

12.2 Metropolitan Pipeline Partially Exposed

In areas where a Metropolitan pipeline is partially exposed during construction, the backfill must be a minimum of 6 inches above the top of the pipeline with sand compacted to minimum 90 percent compaction.

12.3 Metropolitan Cut and Cover Conduit on Colorado River Aqueduct (CRA)

In areas where a Metropolitan cut and cover conduit is exposed, the following guidelines apply:

A. No vehicle or equipment shall operate over or cross the conduit when the cover is less than 3 feet.

B. Track-type dozer with a gross vehicle weight of 12,000 lbs or less may be used over the conduit when the cover is a minimum of 3 feet.

C. Wheeled vehicles with a gross vehicle weight of 8,000 lbs or less may operate over the conduit when the cover is a minimum of 4 feet.

D. Tracked dozer or wheeled vehicle should be used to push material over the conduit from the side.

E. Tracked dozer or wheeled vehicle should gradually increase cover on one side of the conduit and then cross the conduit and increase cover on the other side of the conduit. The cover should be increased on one side of the conduit until a maximum of 2 feet of fill has been placed. The cover over the conduit is not allowed to be more than 2 feet higher on one side of the conduit than on the other side.

F. The cover should be gradually increased over the conduit until the grade elevations have been restored.

13.0 Piles

13.1 Impacts on Metropolitan Pipelines

Pile support for structures could impose lateral, vertical and seismic loads on Metropolitan's pipelines. Since the installation of piles could also cause settlement of Metropolitan pipelines, a settlement and/or lateral deformation study may be required for pile installations within 50 feet of Metropolitan's pipelines. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

13.2 Permanent Cast-in-place Piles

Permanent cast-in-place piles must be constructed so that down drag forces of the pile do not act on Metropolitan's pipeline. The pile must be designed so that down drag forces are not developed from the ground surface to springline of Metropolitan's pipeline.

Permanent cast-in-place piles shall not be placed closer than 5 feet from the edge of Metropolitan's pipeline. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

14.0 Protective Slabs for Road Crossings Over Metropolitan Pipelines

Protective slabs must be permanent cast-in-place concrete protective slabs configured in accordance with Drawing SK-1 (See Figure 2 on Page 22).

The moments and shear for the protective slab may be derived from the American Association of State Highway and Transportation Officials (AASHTO). The following requirements apply:

A. The concrete must be designed to meet the requirements of AASHTO

B. Load and impact factors must be in accordance with AASHTO. Accepted methods of analysis must be used.

C. The protective slab design must be stamped and signed by a California registered civil or structural engineer and submitted to Metropolitan with supporting calculations for review and approval.

Existing protective slabs that need to be lengthened can be lengthened without modification, provided the cover and other loading have not been increased.

15.0 Blasting

At least 90 days prior to the start of any drilling for rock excavation blasting, or any blasting in the vicinity of Metropolitan's facilities, a site-specific blasting plan must be submitted to Metropolitan for review and approval. The plan must consist of, but not be limited to, hole diameters, timing sequences, explosive weights, peak particle velocities (PPV) at Metropolitan pipelines/structures, and their distances to blast locations. The PPV must be estimated based on a site-specific power law equation. The power law equation provides the peak particle velocity versus the scaled distance and must be calibrated based on measured values at the site.

16.0 Metropolitan Plan Review Costs, Construction Costs and Billing

16.1 Plan Review Costs

Metropolitan plan reviews requiring 8 labor hours or less are generally performed at no cost to the project proponent. Metropolitan plan reviews requiring more than 8 labor hours must be paid by the project proponent, unless the project proponent has superior rights at the project area. The plan review will include a written response detailing Metropolitan's comments, requirements, and/or approval.

A deposit of funds in the amount of the estimated cost and a signed letter agreement will be required from the project proponent before Metropolitan begins or continues a detailed engineering plan review that exceeds 8 labor hours.

16.2 Cost of Modification of Facilities Performed by Metropolitan

Cost of modification work conducted by Metropolitan will be borne by the project proponent, when Metropolitan has paramount/prior rights at the subject location.

Metropolitan will transmit a cost estimate for the modification work to be performed (when it has paramount/prior rights) and will require that a deposit, in the amount of the estimate, be received before the work will be performed.

16.3 Final Billing

Final billing will be based on the actual costs incurred, including engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the total cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice for the additional amount will be forwarded for payment.

17.0 Street Vacations and Reservation of Easements for Metropolitan

A reservation of an easement is required when all or a portion of a public street where Metropolitan facilities are located is to be vacated. The easement must be equal to the street width being vacated or a minimum 40 feet. The reservation must identify Metropolitan as a "public entity" and not a "public utility," prior to recordation of the vacation or tract map. The reservation of an easement must be submitted to Metropolitan for review prior to final approval.

18.0 Metropolitan Land Use Guidelines

If you are interested in obtaining permission to use Metropolitan land (temporary or long term), a Land Use Form must be completed and submitted to Metropolitan for review and consideration. A nonrefundable processing fee is required to cover Metropolitan's costs for reviewing your request. Land Use Request Forms can be found at:

http://mwdh2o.com/PDF_Doing_Your_Business/4.7.1_Land_Use_Request_form_revised.pdf

The request should be emailed to RealEstateServices@mwdh2o.com,or contact the Real Property Development and Management (RPDM) Group at (213) 217-7750.

After the initial application form has been submitted, Metropolitan may require the following in order to process your request:

A. A map indicating the location(s) where access is needed, and the location & size (height, width and depth) of any invasive subsurface activity (boreholes, trenches, etc.).

B. The California Environmental Quality Act (CEQA) document(s) or studies that have been prepared for the project (e.g., initial study, notice of exemption, Environmental Impact Report (EIR), Mitigated Negative Declaration (MND), etc.).

C. A copy of an ACORD insurance certification naming Metropolitan as an additional insured, or a current copy of a statement of self-insurance.

D. Confirmation of the legal name of the person(s) or entity(ies) that are to be named as the permittee(s) in the entry permit.

E. Confirmation of the purpose of the land use.

F. The name of the person(s) with the authority to sign the documents and any specific signature title block requirements for that person or any other persons required to sign the document (i.e., legal counsel, Board Secretary/Clerk, etc.).

G. A description of any vehicles that will have access to the property. The exact make or model information is not necessary; however, the general vehicle type, expected maximum dimensions (height, length, width), and a specific maximum weight must be provided.

Land use applications and proposed use of the property must be compatible with Metropolitan's present and/or future use of the property. Any preliminary review of your request by Metropolitan shall not be construed as a promise to grant any property rights for the use of Metropolitan's property.

19.0 Compliance with Environmental Laws and Regulations

As a public agency, Metropolitan is required to comply with all applicable environmental laws and regulations related to the activities it carries out or approves. Consequently, project plans, maps, and other information must be reviewed to determine Metropolitan's obligations pursuant to state and federal environmental laws and regulations, including, but not limited to:

A. California Environmental Quality Act (CEQA) (Public Resources Code 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 1500-15387)

B. Federal Endangered Species Act (ESA) of 1973, 16 U.S.C. §§ 1531, et seq.

C. California Fish and Game Code Sections 2050-2069 (California ESA)

D. California Fish and Game Code Section 1602

E. California Fish and Game Code Sections 3511, 4700, 5050 and 5515 (California fully protected species)

F. Federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. §§ 703-712

G. Federal Clean Water Act (including but not limited to Sections 404 and 401) 33 U.S.C. §§ 1342, 1344)

H. Porter Cologne Water Quality Control Act of 1969, California Water Code §§ 13000-14076.

I. Title 22, California Code of Regulations, Chapter 16 (California Waterworks Standards), Section 64572 (Water Main Separation)

Metropolitan may require the project applicant to pay for any environmental review, compliance and/or mitigation costs incurred to satisfy such legal obligations.

20.0 Paramount Rights / Metropolitan's Rights within Existing Rights-of-Way

Facilities constructed within Metropolitan's rights-of-way shall be subject to the paramount right of Metropolitan to use its rights-of-way for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove or relocate any facilities from its rights-of-way, such removal and replacement or relocation shall be at the expense of the owner of the facility.

21.0 Disclaimer and Information Accuracy

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as you may deem prudent, to assure that your project plans are correct. The relevant representative from Metropolitan must be called at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

Table 1: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Sanitary Sewer[2] or Hazardous Fluid Pipeline[3]

Pipeline Crossings	Metropolitan requires that sanitary sewer and hazardous fluid pipelines that cross Metropolitan's pipelines have special pipe construction (no joints) **and** secondary containment[4]. This is required for the full width of Metropolitan's rights-of-way or within 10 feet tangent to the outer edges of Metropolitan's pipeline within public streets. Additionally, sanitary sewer and hazardous fluid pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance between the top and the bottom of Metropolitan's pipeline and the pipe casing. These requirements apply to all sanitary sewer crossings regardless if the sanitary sewer main is located below or above Metropolitan's pipeline.
Parallel Pipeline	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requires that all parallel sanitary sewer, hazardous fluid pipelines and/or non-potable utilities be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, longitudinal pipelines require special pipe construction (no joints) **and** secondary containment[4].
Sewer Manhole	Sanitary sewer manholes are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests manholes parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment[5].

Notes:

[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Sanitary sewer requirements apply to all recycled water treated to less than disinfected tertiary recycled water (disinfected secondary recycled water or less).* Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

[3] *Hazardous fluids include e.g., oil, fuels, chemicals, industrial wastes, wastewater sludge, etc.*

[4] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[5] *Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.*

Table 2: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Storm Drain and/or Disinfected Tertiary Recycled Water[2]

Pipeline Crossings	Metropolitan requires crossing pipelines to be special pipe construction (no joints) or have secondary containment[3] within 10-feet tangent to the outer edges of Metropolitan's pipeline. Additionally, pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance.
Parallel Pipeline	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requests that all parallel pipelines be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, special pipe construction (no joints) or secondary containment[3] are required.
Storm Drain Manhole	Permanent utility structures (e.g., manhole. catch basin, inlets) are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests all structures parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment[4].

Notes:

[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Disinfected tertiary recycled water as defined* in Title 22, California Code of Regulations, Chapter 3 (*Water Recycling Criteria*), Section 60301.

[3] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[4] *Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.*

Table 3: General Guidelines for Pipeline Separation[1] between Metropolitan's Pipeline and Recycled Water[2,4] Irrigations

Pressurized recycled irrigation mainlines	• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing pressurized recycled irrigation mainlines must be special pipe construction (no joints) or have secondary containment[3] within 10-feet tangent to the outer edges of Metropolitan's pipeline. • Longitudinal - must maintain a minimum 10-foot horizontal separation and route along the perimeter of Metropolitan's rights-of-way where possible.
Intermittently Energized Recycled Water Irrigation System Components	• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment[3]. • Longitudinal – must maintain a minimum 5-foot horizontal separation between all intermittently energized recycled water irrigation system components (e.g. irrigation lateral lines, control valves, rotors) and the outer edges of Metropolitan's pipeline. Longitudinal irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment[3].
Irrigation Structures	Irrigation structures such as meters, pumps, control valves, etc. must be located outside of Metropolitan's rights-of-way.
Irrigation spray rotors near Metropolitan's aboveground facilities	Irrigation spray rotors must be located a minimum of 20-foot from any Metropolitan above ground structures with the spray direction away from these structures. These rotors should be routinely maintained and adjusted as necessary to ensure no over-spray into 20-foot clear zones.
Irrigations near open canals and aqueducts	Irrigation with recycled water near open canals and aqueducts will require a setback distance to be determined based on site-specific conditions. Runoff of recycled water must be contained within an approved use area and not impact Metropolitan facilities. Appropriate setbacks must also be in place to prevent overspray of recycled water impacting Metropolitan's facilities.

Notes:

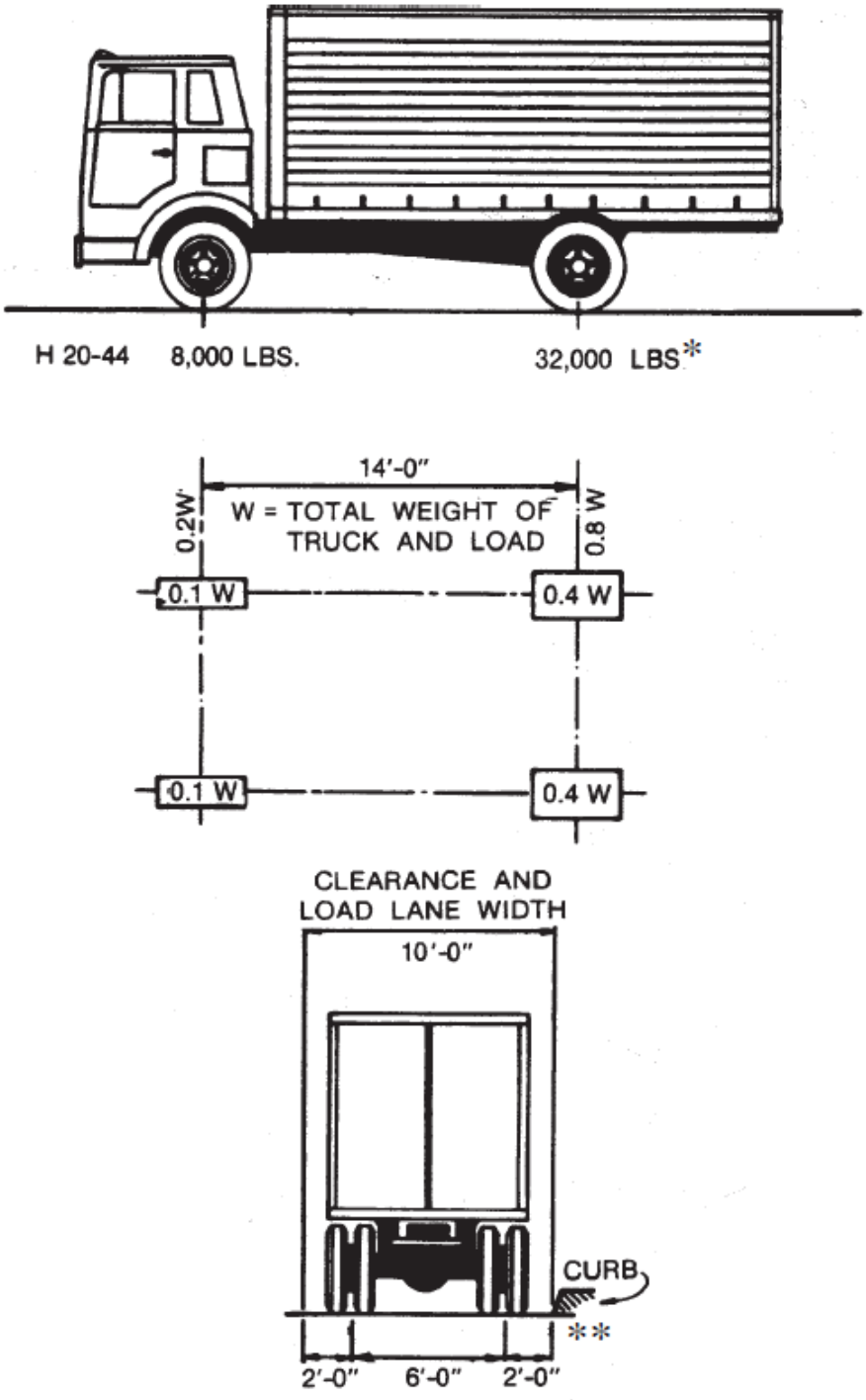
[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Requirements for recycled water irrigation apply to all levels of treatment of recycled water for non-potable uses.* Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (*Water Recycling Criteria*), Section 60301.

[3] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

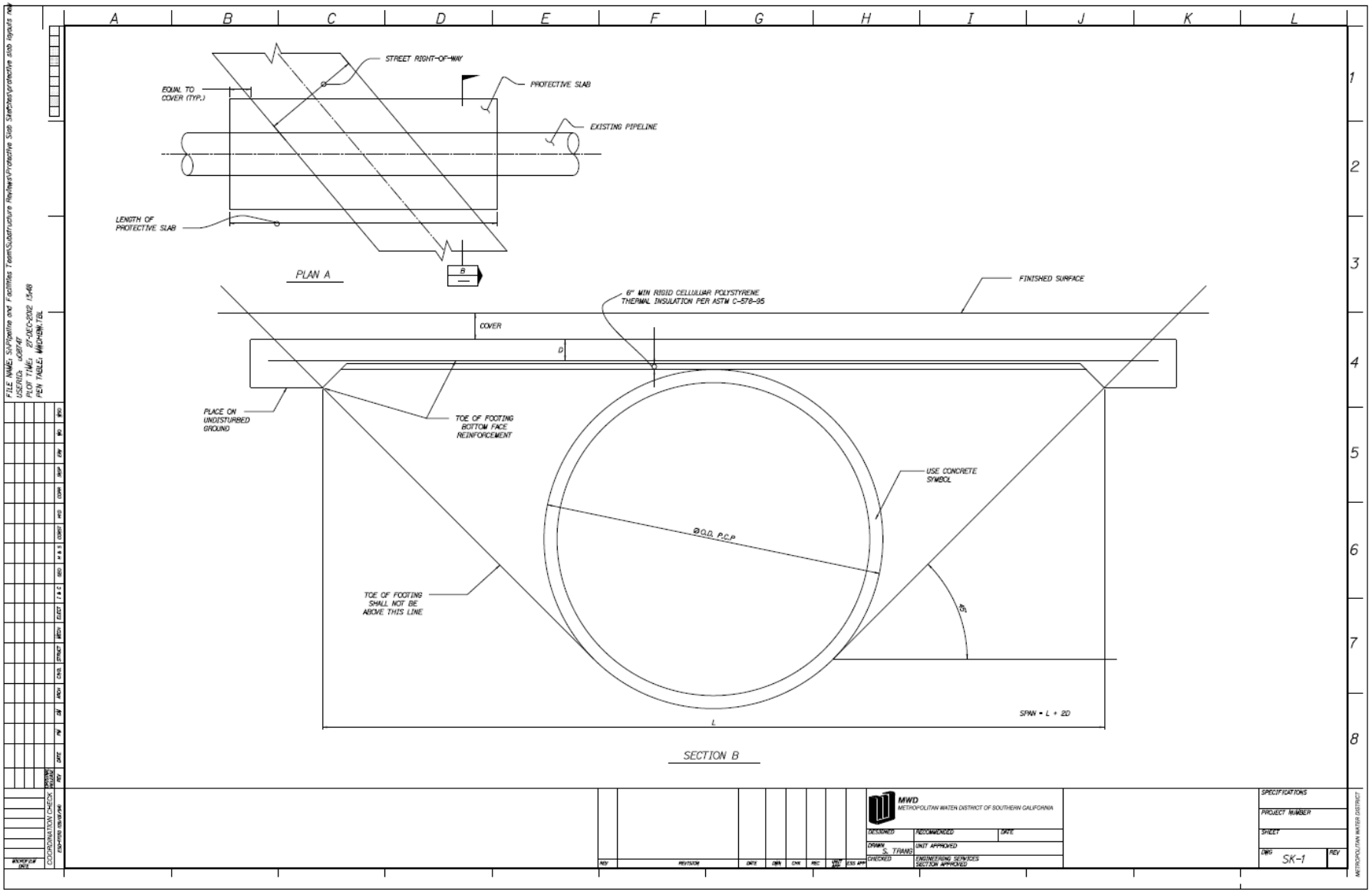
[4] *Irrigation with recycled water shall not be applied directly above Metropolitan's treated water pipelines.*

Figure 1: AASHTO H-20 Loading



Note: The H loadings consist of a two-axle truck or the corresponding lane loadings as illustrated above. The H loadings are designated "H" followed by a number indicating the gross weight in tons of the standard truck.

Figure 2: Drawing SK-1



RA-90

Metropolitan Water District of Southern California – RA-1

Comment ID	Response
RA-1-1	No response needed
RA-1-2	The comment regarding the referenced correspondence letter is acknowledged.
RA-1-3	Metro will coordinate with the Metropolitan Water District of Southern California as applicable as design of the Project advances and utility plans, including for protection in place, are developed. For additional information, refer to Chapter 4, Section 4.19.2.3 of the Draft EIS/EIR.
RA-1-4	Metro will submit applicable construction specifications to the Metropolitan Water District of Southern California prior to the start of construction.
RA-1-5	Chapter 4, Section 4.19.3.7 in the Final EIS/EIR contains additional analysis related to construction vibration effects on underground utilities, including protective impact criteria for such utilities.
RA-1-6	Metro will coordinate with the Metropolitan Water District of Southern California to identify load-restricted locations.
RA-1-7	Metro will coordinate with the Metropolitan Water District of Southern California as applicable as design of the Project advances. This includes potholing as part of the development of utility plans.
RA-1-8	See response CR-GEN-1 regarding identification of the LPA.
RA-1-9	The comment regarding the Project is acknowledged.
RA-1-10	Feeders identified are underground and generally not affected by the Project. Where the feeders do cross the LPA, the LPA alignment will be at grade or in an aerial configuration. These pipelines have been identified and will be considered as design progresses.
RA-1-11	Metro will coordinate with the Metropolitan Water District of Southern California as applicable as design of the Project advances. Plans that affect Metropolitan Water District right-of-way or its facilities will be shared for review and coordination.
RA-1-12	Refer to the responses to comments RA-1-5 and RA-1-11.
RA-1-13	Metro will coordinate with the Metropolitan Water District of Southern California as applicable as design of the Project advances and utility plans are developed. As-built information on existing utilities will be confirmed as design progresses.

Orange County Transportation Authority

From: Lauren Sato <lsato@octa.net>
Sent: Thursday, September 30, 2021 11:14 AM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Dan Phu <DPhu@octa.net>; Kim Tucker <ktucker@octa.net>; Angel Lin <alin@octa.net>; Angel Castro <acastro1@octa.net>
Subject: OCTA Comments: LA Metro - West Santa Ana Branch Transit Corridor Project Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR)

Dear Mrs. Khanna—

Thank you for providing the Orange County Transportation Authority (OCTA) with the opportunity to review the EIS/EIR for the West Santa Ana Branch Transit Corridor Project (Project). We acknowledge that we are late in submitting, but would appreciate your consideration of the attached comments from OCTA in regards to the Project. RA-7-1

If you have any questions, feel free to contact me.

Thank you,

Lauren Sato (she/her/hers)
Transportation Analyst
Orange County Transportation Authority
lsato@octa.net | 714.560.5756

September 30, 2021

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

Subject: **West Santa Ana Branch Transit Corridor Project Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR)**

Dear Mrs. Khanna:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Draft EIS/EIR for the West Santa Ana Branch Transit Corridor Project (Project). The following comments are provided for your consideration.

- Page 1-11, Figure 1-5. ('Study Area Bus Service'), please exclude OCTA Routes 701 (traveling on Interstates 105 and 605) and 721 (shown on State Route 91) from the map as they have been temporarily suspended as a result of COVID-19. OCTA is currently underway with the bus restructuring plan which is anticipated to conclude in late 2022. This process will determine if OCTA is going to reinitiate these routes. RA-7-2

- Draft EIS/EIR Appendix D ('Final Transportation Impact Analysis Report'):
  - Page 5-40, please exclude OCTA Routes 701 and 721 from Table 5.32 ('Bus Boardings by Line') as noted above.
  - Page 5-45, please exclude OCTA Routes 701 and 721 from Table 5.38 ('Bus Boardings by Line') as noted above. RA-7-3
  - Pages 5-40 and 5-45, Tables 5.32 and 5.38, respectively; please consider creating another header, such as "Other Agency Routes," after OCTA Routes 30 and 38 are listed to clearly show that the subsequent routes do not belong to OCTA. RA-7-4

Orange County Transportation Authority
550 South Main Street / P.O. Box 14184 / Orange / California 92863-1584 / (714) 560-OCTA (6282)

Throughout the development of this project, we encourage communication with OCTA on any matters discussed herein. If you have any questions or comments, please contact me at dphu@octa.net or (714) 560-5907.

Sincerely,

Dan Phu
Environmental Programs Manager

Orange County Transportation Authority – RA-7

Comment ID	Response
RA-7-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
RA-7-2	The Federal Transit Administration published the Notice of Intent (NOI) in the Federal Register on July 26, 2017, pursuant to the requirements of the National Environmental Protection Act. Prior to the NOI publication, Metro issued a Notice of Preparation (NOP) on May 25, 2017, pursuant to the requirements of the California Environmental Quality Act. Based on the timing of the NOI and NOP publication, the required environmental baseline socioeconomic growth projections were established in July 2017. The existing conditions assessment was based on best available data available from either 2016 or 2017, depending on availability. To maintain consistency, the 2016/2017 baseline data was not modified in the Final EIS/EIR, unless new data was collected to support analyses. Routes 701 and 721 were in operation in 2017 and are correctly included as part of existing conditions. The title of Figure 1-5 was updated to include 2017 to clarify the timeframe the information reflects. The introduction to Chapter 4 of the Final EIS/EIR provides further discussion of the unchanged baseline year 2017 for the Final EIS/EIR.
RA-7-3	See response to comment RA-7-2
RA-7-4	A new header has been added to Table 5.13 of the *West Santa Ana Branch Transit Corridor Final Transportation Impact Analysis Report* (previously Appendix D of the Draft EIS/EIR) to separate Orange County Transportation Authority routes from other agency routes.

Port of Long Beach

From: Holford, Alex <alex.holford@polb.com>
Sent: Thursday, October 14, 2021 12:58 PM
To: Khanna, Meghna <KhannaM@metro.net>; Yoh, Allison <YohA@metro.net>
Cc: Vernon, James <james.vernon@polb.com>; Killeen, Eamonn <eamonn.killeen@polb.com>; Luzzi, Carlo <carlo.luzzi@polb.com>; Dau-Ngo, Theresa <theresa.dau-ngo@polb.com>; Takahashi, Mari <mari.takahashi@polb.com>; Ramsay, Daniel <daniel.ramsay@polb.com>; Shepack, Debra <debra.shepack@polb.com>; kcartwright@portla.org; MKatnich@portla.org
Subject: West Santa Ana Branch Transit Corridor Project DEIS-DEIR - Port of Long Beach Comment Letter

Good afternoon Meghna,

Attached are Port of Long Beach's comments on the West Santa Ana Branch Transit Corridor Project Draft EIS-EIR. Please feel free to contact me if you have any questions.

RA-9-1

Thanks,
Alex

Alex Holford
Environmental Specialist Associate
Environmental Planning
Port of Long Beach

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Port of
LONG BEACH
THE PORT OF CHOICE

October 15, 2021

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

Subject: **West Santa Ana Branch Transit Corridor Project Draft Environmental Impact Statement/Environmental Impact Report Comment Letter**

Dear Ms. Khanna,

The Port of Long Beach (Port) appreciates the opportunity to review and comment on the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) prepared by the Los Angeles County Metropolitan Transportation Authority (Metro) and Federal Transit Administration (FTA) for the proposed West Santa Ana Branch Transit Corridor Project (Project). The Project's overall purpose is to provide high-quality reliable transit service to meet the future mobility needs of residents, employees, and visitors who travel within and through the southeastern Los Angeles County region. This new transit service will increase mobility and connectivity for historically underserved and transit-dependent communities, improve travel times on local and regional transportation networks, and accommodate substantial future employment and population growth.

The Port has made significant investments over the years, and will continue to make investments, to build rail infrastructure in the terminals and throughout the Port complex, with the goal of accommodating 35% of all cargo leaving the Port complex by rail. Projects such as the Pier B On-Dock Rail Support Facility will greatly improve rail operations while also easing roadway traffic congestion and improving air quality. In 2016, 23.5% of all containerized cargo moving through the Port went by rail and over the long term, the Port will seek to handle up to 50% of all cargo leaving the Port complex by rail. Thus freight rail networks in the region are a vital component in pursuing our rail goals.

RA-9-2

The Port is in support of the Project and its purpose of providing mobility options to the Los Angeles County region, and as such, is committed to working collaboratively with Metro and other stakeholders. The Port of Long Beach has reviewed the Draft EIS/EIR and is providing the following comments for consideration:

RA-9-3

<u>Right of Way and Property Rights</u>

- The Port requests preservation of the San Pedro Branch Right of Way (ROW) (approximately 20 miles) as an emergency route for the Alameda Corridor Transportation Authority (ACTA). This ROW, which is jointly owned by the Port of Long Beach and Port of Los Angeles, needs to be able

RA-9-4

to accommodate the demands of the heavy freight cargo movement similar to the railcar traffic flow on the Alameda Corridor. Metro proposes to use approximately 6.1 miles of the San Pedro Branch ROW, between Florence Avenue (in Huntington Park, CA) and Rosecrans Avenue (in Paramount, CA). The Project would require modification to the San Pedro Branch ROW, including proposed realignment of freight rail tracks. RA-9-4

- The Project will limit the ability to add additional tracks in the future that serve the joint ports and other stakeholders, therefore diminishing the functional ability of the ROW. The Port requests Metro to address impacts to future use for freight rail service, and to mitigate the loss and functional ability of the ROW and offset the diminished monetary value of the remaining ROW. RA-9-5
- The Port requests Metro to address just compensation for the acquisition of the rights along the San Pedro Branch ROW. The type of acquisitions such as railroad easements, aerial easements, fee takes, and temporary construction easements need to be identified and negotiated with the joint ports. Further research may be required for any requirements the joint ports may need to address for any type of acquisition by Metro (i.e. impacts on ties to bond issuance). Additionally, there will need to be verification of real property rights along the ROW, including title reports, ALTA surveys, etc. RA-9-6
- Metro will need to cooperate with the joint ports on any existing and future third party use of the ROW such as utilities and other uses, which may include entering into real estate agreements with these entities. RA-9-7

<u>Alignment</u>

- The joint Ports and Union Pacific Railroad Company (UPRR) will need further discussion on the proposed alignment and the impacts to UPRR and/or the Alameda Corridor's rail continuity. Metro will need to preserve the joint ports' operating agreement with Union Pacific Railroad (UPRR). RA-9-8
- Metro has defined a minimum safety clearance of 20' between the freight and light rail tracks. Metro must ensure that both UPRR and the Public Utilities Commission (PUC) are in agreement with the minimum safety clearance. RA-9-9
- The EIR/EIS states that after a meeting with the Ports of Los Angeles and Long Beach was held on September 11, 2018, the WSAB design was updated to relocate the project tracks to the west side. However, the location of the freight tracks are shown on the west side of the plans. Metro should address this discrepancy. RA-9-10

Port of
LONG BEACH
THE PORT OF CHOICE

Maintenance

- Currently, UPRR is responsible for maintenance duties such as weed abatement, graffiti removal, free of encroachments, homeless encampments, etc. Metro will need to coordinate with the Ports and UPRR on how Metro will address the maintenance within the 6.1 mile stretch of the proposed alignment within the San Pedro Branch ROW. RA-9-11

Stakeholder Coordination

- Metro will need to address and be responsible for any future residential complaints and issues with the realignment adjacent to residential property; potentially entering into a MOU between Metro and the Port to address these types of issues. RA-9-12
- The Port requests continued coordination with Metro, along with other relevant stakeholders, including Port of Los Angeles, UPPR, and ACTA. RA-9-13

The Port of Long Beach appreciates the opportunity to comment on the Draft EIS/EIR for the Project and looks forward to further collaboration as the Project develops. If you have questions regarding this letter, please contact Alex Holford at (562) 283-7100 or alex.holford@polb.com.

Sincerely,

James Vernon
Assistant Director of Environmental Planning

cc: Eamonn Killeen, Director of Real Estate
Mari Takahashi, Assistant Director of Real Estate
Debbie Shepack, Senior Leasing Officer V
Carlo Luzzi, Acting Director of Tenant Services and Operations
Theresa Dau-Ngo, Acting Director of Transportation Planning
Dan Ramsay, Manager of Environmental Remediation
Kerry Cartwright, Director of Goods Movement (Port of Los Angeles)
Marisa Katnich, Director of Cargo and Industrial Real Estate (Port of Los Angeles)

Port of Long Beach – RA-9

Comment ID	Response
RA-9-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
RA-9-2	Metro recognizes the Port's dependence on freight rail.
RA-9-3	The Port of Long Beach's support for the Project is noted.
RA-9-4	The Project will not affect the ability of the Alameda Corridor Transportation Authority to use the San Pedro Branch right-of-way. Existing tracks and through-connections will be maintained or replaced to provide equivalent capabilities of the existing tracks, where feasible. Modifications to freight tracks have been coordinated with Union Pacific Railroad (UPRR) and the Ports during meetings since circulation of the Draft EIS/EIR.
RA-9-5	Since circulation of the Draft EIS/EIR, Metro completed a study of changes to the light rail transit (LRT) alignment to accommodate a second mainline track. The study concluded that refinements to the LRT to accommodate a second mainline track would substantially increase the cost of the Project and therefore was determined infeasible. This study was shared with the Port of Long Beach and Port of Los Angeles in January 2023 and concurrence was received on the findings. The WSAB Project has been designed for forward compatibility with identified projects in the corridor. Metro has not received design requirements for potential future freight track expansion; therefore, Metro is unable to confirm compatibility. Analysis of potential conflicts would be speculative without the design requirements for future planned services.
RA-9-6	As part of regularly scheduled monthly meetings, Metro has regularly coordinated with the Port of Los Angeles and Port of Long Beach since circulation of the Draft EIS/EIR. The comment regarding property transition being subject to the review and approval processes is noted. The acquisition process is independent of the National Environmental Policy Act and California Environmental Quality Act processes. Discussions have begun on the type of acquisition, but acquisitions will not occur until after the issuance of the Record of Decision.
RA-9-7	The comment regarding use of right-of-way is acknowledged. Coordination with the Port of Long Beach will continue as design advances.
RA-9-8	Metro has regularly coordinated with the Port of Los Angeles and Port of Long Beach since circulation of the Draft EIS/EIR. Coordination has included discussion on design of the Project and realignment of the existing freight tracks. Refer to the response to comment RA-9-4 regarding the Alameda Corridor Transportation Authority.
RA-9-9	The 20-foot track separation has been discussed in meetings with the UPRR, the California Public Utilities Commission, and the joint Ports since circulation of the Draft EIS/EIR. The 20-foot separation has been determined acceptable. In February 2024, Metro executed an initial Memorandum of Understanding (MOU) with UPRR, the Port of Long Beach, the Port of LA, and the Alameda Corridor Transportation Authority (ACTA) to memorialize key project components, including horizontal and vertical clearances, with the understanding that the parties will work together to form consensus and provide recommendations on terms and conditions that will be included in the ultimate agreement(s), also known as the Construction and Maintenance Agreement.

Comment ID	Response
RA-9-10	The text refers to the location of the LRT tracks within the San Pedro subdivision. LRT tracks will be on the east side of the subdivision, while the freight tracks will be relocated toward the west along the subdivision. This design has been coordinated, reviewed, and shared with UPRR and the joint Ports since circulation of the Draft EIS/EIR. The summary of the September 11, 2018, meeting has been updated in Chapter 7, Section 7.5.3 of the Final EIS/EIR.
RA-9-11	Metro will maintain the area within Metro right-of-way. Metro has a graffiti program that requires removal of graffiti within 24 hours of when it is reported. In addition, the Metro Rail Design Criteria requires a graffiti-resistant coating to furnishings and surfaces to prevent graffiti. Additional language regarding Metro's littering, dumping, and graffiti programs has been incorporated into Chapter 4, Section 4.18.3.2 of the Final EIS/EIR and in Chapter 5, Sections 5.2.7 and 5.4.7 of the *West Santa Ana Branch Transit Corridor Project Final Safety and Security Impact Analysis Report* (previously Appendix F of the Draft EIS/EIR). While it is not anticipated there will be added trespassing, encampments, dumping, or graffiti generated from the Project, these issues will continue to be considered as design continues to advance for the Project.
RA-9-12	Metro has responsibility to address impacts created by construction or operation of the LRT project. Where new impacts will occur as a result of freight track relocation to accommodate the LRT project, those impacts have been treated as project impacts and Metro's responsibility. As such, the LPA includes mitigation, such as soundwalls, for impacts associated with relocated freight tracks, where mitigation is feasible. Alternatively, impacts related to operation of the existing system, or effects from operation on relocated tracks that would also have occurred with the tracks remaining in their current location, including any effects related to future changes in freight operations independent of the LRT project, would continue to be the responsibility of the freight rail operator.
RA-9-13	Metro staff met with ACTA on April 27, 2023, to provide a project update. Refer to response to RA-9-9 regarding the initial MOU and ongoing coordination. Metro will continue to coordinate with UPRR, the Port of Long Beach, the Port of LA, and ACTA throughout design and construction of the Project, as applicable.

Port of Los Angeles

From: Sanchez, Deyra <DSanchez2@portla.org>
Sent: Friday, October 15, 2021 7:56:30 AM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Gioiello, Tony <TGioiello@portla.org>; Katnich, Marisa <MKatnich@portla.org>; Globus, Regner <RGlobus@portla.org>; Cartwright, Kerry <KCartwright@portla.org>; Cannon, Chris <CCannon@portla.org>; Barry, Sabrina <SBarry@portla.org>; Bijelic, Danielle <DBijelic@portla.org>; REDClerical <REDClerical@portla.org>
Subject: Letter to Metro Re: West Santa Ana Branch Transit Corridor Project

Please see the attached letter on behalf of the Port of Los Angeles, Real Estate Division. Ms. Khanna, a hardcopy will follow in the mail. Any questions can be sent to Marisa Katnich at mkatnich@portla.org.

RA-10-1

Deyra Sanchez
Port of Los Angeles
Real Estate Division
425 S. Palos Verdes Street
San Pedro, CA 90731
(310) 732-3895

THE PORT OF LOS ANGELES
425 S. Palos Verdes Street Post Office Box 151 San Pedro, CA 90733-0151 TEL/TDD 310 SEA-PORT www.portoflosangeles.org

October 14, 2021

Sent via US Mail and E-mail
KhannaM@metro.net

Ms. Meghna Khanna
Project Manager
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza, M/S 99-22-4
Los Angeles, CA 90012

Dear Ms. Khanna:

SUBJECT: PORT OF LOS ANGELES COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT FOR METRO'S WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT

Thank you for the opportunity to provide comments on the West Santa Ana Branch Transit Corridor Project (Project). While we recognize the many benefits of this Project and expect there will be extensive ongoing coordination efforts concerning Project execution, we are taking this opportunity to memorialize the Port of Los Angeles' comments on the Project. RA-10-2

1. Right-of-Way Requirements and Alignment

   - Certain portions of the right-of-way required for the Project are jointly owned by the Port of Los Angeles (POLA) and Port of Long Beach (collectively, Ports). The Ports are focused on providing a comprehensive response for this project. As such, please furnish a property impact statement and right-of-way requirements exhibit detailing the exact location and dimensions of the joint-owned property required for this Project, as well as copies of title reports and surveys. The type of acquisitions that Metropolitan Transportation Authority (Metro) seeks (e.g. fee simple acquisition, rail easements, and temporary construction easements) also need to be identified and negotiated. RA-10-3

     The effectiveness of any property transaction is subject to full completion of all review and approval processes required by the Los Angeles City Charter and Administrative Code, inclusive of approval by the Board of Harbor Commissioners and Los Angeles City Council, if applicable. Further, POLA transactions are subject to compliance with the Tidelands Trust Act. Port of Long Beach presumably has similar approval processes.

- The Ports issue real estate permits allowing various secondary users to cross the Ports jointly-owned property. These permits are not recorded with the County Recorder's Office. It is incumbent upon Metro to determine whether any of these permits conflict with the proposed alignment and to manage tenant relocation in accordance with applicable laws. Future coordination between the Ports and Metro concerning issuance of future agreements of this nature will be required. RA-10-4

- POLA is operating under the premise that Metro will be the lead on engaging with all affected property owners and securing all required right-of-way for the project. This includes acquiring any property rights required in order for Metro to relocate the San Pedro Branch tracks. RA-10-5

- POLA recommends Metro takes into account the following Purchase and Sale Agreement, and any amendments and other agreements made therein when conducting its due diligence concerning execution of the Project. Coordination with Union Pacific Railroad, Metro, and the Ports will be required now and throughout design/construction. Metro is specifically referred to Section 2.1 of the Operating Agreement. RA-10-6

  Purchase and Sale Agreement dated as of December 22, 1994, between and among Union Pacific Railroad Company, a Utah corporation ("Seller",) The City of Los Angeles, acting by and-through The Board of Harbor Commissioners of The Port of Los Angeles ("POLA"), and The City of Long Beach, acting by and through its Board of Harbor Commissioners ("POLB") (collectively, "purchaser"). LA Agreement #1814

- POLA requests Metro ensure the San Pedro Branch Right-of-Way (ROW) (approximately 20 miles) continues to be available as an emergency route for the Alameda Corridor Transportation Authority. It is critical that there is no interference to freight operations or disruption to this as an alternative Alameda Corridor route, both during the construction phase and operational phase of the Project. RA-10-7

- POLA requests Metro provide evidence that the minimum safety clearance of 20' between the freight and light rail tracks complies with all applicable laws. RA-10-8

- In connection with the planned sound walls/retaining walls and the intertrack fence in many areas, POLA requests how Metro will ensure the Ports have adequate and continued access and maintenance. RA-10-9

- POLA seeks to preserve the ability to add new track on the Ports' right-of-way in the future. RA-10-10

2. Environmental Considerations

- Metro has included mitigation measures in the Draft EIS/EIR that are designed to avoid, minimize, or compensate for adverse or significant impacts. There is currently a lack of clarity in the mitigation measures since they do not adequately specify responsible parties. POLA requests the addition of responsible parties for each mitigation measure. RA-10-11

- Port application process is required if any permits are needed. All permits issued by POLA require an Application for Port Permit (APP). The APP can be filled out and submitted online at: https://permits.portoflosangeles.org/application-type. It is important to note that permits for jointly owned property would require a separate application to each responsible entity. RA-10-12

Should you have any questions, please feel free to contact Marisa Katnich, Director of Cargo and Industrial Real Estate, at mkatnich@portla.org.

Sincerely,

Michael DiBernardo

MICHAEL DiBERNARDO
Deputy Executive Director

MD:MK:raw
G:\doc\Marisa\ACP LA Metro W Santa Ana_Cmmt Ltr

ec: Tony Gioiello, Port of Los Angeles, Deputy Executive Director
Marisa Katnich, Port of Los Angeles, Real Estate
Regner Globus, Port of Los Angeles, Real Estate
Kerry Cartwright, Port of Los Angeles, Goods Movement
Chris Cannon, Port of Los Angeles, Environmental Management

Port of Los Angeles – RA-10

Comment ID	
RA-10-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
RA-10-2	Refer to the following responses to comments below.
RA-10-3	As part of regularly scheduled monthly meetings, Metro has coordinated with the Port of Los Angeles (POLA) and Port of Long Beach since circulation of the Draft EIS/EIR. This coordination has included in-person sessions discussing a range of topics. Right-of-way plans have been shared with the joint Ports. The comment regarding property transition being subject to review and approval processes is noted. The acquisition process is independent of the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA)processes. Discussions have begun on the type of acquisition, but acquisitions will not occur until after receiving the Record of Decision. Title reports and boundary surveys will be completed as part of the acquisition process after the issuance of the Record of Decision pursuant to NEPA and Notice of Determination pursuant to CEQA.
RA-10-4	Metro would appreciate access to POLA and Port of Long Beach permit records to be able to identify real estate permits applicable to the LPA. Right-of-way plans prepared for the Project are included as Appendix B in the Draft and Final EIS/EIR and serve as a starting point to identify potential conflicts.
RA-10-5	Metro confirms that they will be the lead on acquiring the right-of-way needed for the Project. This process can formally begin after completion of the environmental clearance process.
RA-10-6	Metro has regularly coordinated with Union Pacific Railroad (UPRR) and the joints Ports since circulation of the Draft EIS/EIR. This coordination will continue through design and construction. Refer to response to comment RA-10-3 for a summary of coordination.
RA-10-7	The West Santa Ana Branch Project will not affect the ability of the Alameda Corridor Transportation Authority (ACTA) to use the San Pedro Branch right-of-way. As design progresses, this requirement will be considered. In addition, Metro met with ACTA on April 27, 2023, to provide a project update. Metro will continue to coordinate with ACTA throughout design and construction of the Project, as applicable.
RA-10-8	A 20-foot minimum clearance between tracks conforms to the minimum clearance required by UPRR Engineering Standards. An example can be seen in STD DWGs 0001D and STD DWG 0038K that show the minimum operating clearances for freight in Appendix B of the Draft and Final EIS/EIR. This clearance also meets Metro Rail Design Criteria. In February 2024, Metro executed an initial Memorandum of Understanding with UPRR, the Port of Long Beach, POLA, and ACTA to memorialize key project components, including horizontal and vertical clearances, with the understanding that the parties will work together to form consensus and provide recommendations on terms and conditions that will be included in the ultimate agreement(s), also known as the Construction and Maintenance Agreement.
RA-10-9	Access to tracks will be considered as design progresses. Points of access along soundwalls will be provided taking both emergency and maintenance access into consideration. Soundwalls have been placed on each side of the light rail transit (LRT) tracks rather than each side of the right-of-way to maintain maintenance access to the freight tracks. Additionally, access will be maintained at all grade crossings.

Comment ID	
RA-10-10	Since circulation of the Draft EIS/EIR, Metro completed a study of changes to the LRT alignment to accommodate a second mainline track. The study concluded that refinements to the LRT to accommodate a second mainline track would substantially increase the cost of the Project and, therefore, was determined infeasible. This study was shared with the Port of Long Beach and POLA in January 2023, and concurrence was received on findings. The WSAB Project has been designed for forward compatibility with identified projects in the corridor. Metro has not received design requirements for potential future freight track expansion; therefore, Metro is unable to confirm compatibility.
RA-10-11	All mitigation measures are ultimately the responsibility of Metro as the project sponsor. Certain mitigation measures are subject to approval of other jurisdictions and agencies; the text of mitigation measures indicates when they are subject to approval of others.
RA-10-12	The comment regarding the Port application process is noted. Metro will submit the permit if applicable.

South Coast Air Quality Management District

From: Alina Mullins <AMullins@aqmd.gov>
Sent: Friday, September 24, 2021 8:34:45 AM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Lijin Sun <LSun@aqmd.gov>
Subject: South Coast AQMD Staff's Comments on Draft EIR for the Proposed WSAB Transit Corridor Project (SCH No.: 2017061007)

Dear Mrs. Khanna,

Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report (Draft EIR) for the Proposed West Santa Ana Basin Transit Corridor Project (SCH No.: 2017061007) (South Coast AQMD Control Number: LAC210803-11). Please contact me if you have any questions regarding these comments. RA-3-1

Thank you,

Alina Mullins
Air Quality Specialist, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
P. (909) 396-2402
E. amullins@aqmd.gov
**Please note that South Coast AQMD is closed on Mondays. Additionally, in response to COVID-19, our building is currently closed to the public and I am working remotely. I will be responding to emails and voice messages during my scheduled work hours, Tuesday through Friday 7:00 am to 5:30 pm.*

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
Khannam@metro.net
Meghna Khanna, Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-22-7
Los Angeles, California 90012

September 24, 2021

Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Proposed West Santa Ana Branch Transit Corridor Project (Proposed Project) (SCH No.: 2017061007)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Los Angeles County Metropolitan Transportation Authority (Metro) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include the CEQA air quality analysis for operational impacts from freight relocation, recommended project design features and mitigation measure, and South Coast AQMD permits that the Lead Agency should include in the Final EIS/EIR.

Based on the Draft EIS/EIR, the Proposed Project consists of construction of a 20-mile light rail transit system with up to 12 stations. The overall purpose of the Proposed Project is to provide high-quality and reliable transit service to meet the future mobility and connectivity needs of communities in southeastern Los Angeles County. The Proposed Project encompasses 98 square miles and includes three designated AB 617 communities: 1) East Los Angeles, Boyle Heights, West Commerce, 2) Southeast Los Angeles, and 3) South Los Angeles. The Draft EIS/EIR evaluated four Build Alternatives for the Proposed Project and identified Alterative 3 as the preferred Build Alternative for the Proposed Project. Construction is anticipated to begin in 2022 and will be completed in 2028[1]. Once operational, the Proposed Project is anticipated to reduce between 70,800 to 437,800 vehicle miles traveled (VMT) in the analysis year 2042[2]. RA-3-2

Based on a review of the Draft EIS/EIR and supporting technical documents, South Coast AQMD staff has four main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. CEQA Air Quality Analysis for Operational Impacts from Freight Relocation: The Draft EIS/EIR stated that segments of any of the Build Alternatives would require relocation and reconstruction of existing freight tracks. If any of the Build Alternatives is selected for the Proposed Project, it could bring emissions from freight activities closer to sensitive receptors. However, the Draft EIS/EIR did not provide additional information or analysis of the environmental impacts associated with this direct impact of Proposed RA-3-3

[1] Draft EIR. Page 4-879.
[2] *Ibid*. Chapter 3. Transportation. Pages 3-111 to 3-112.

Project. The Lead Agency should provide more information on freight relocation, freight activities on the relocated tracks, and analyze the direct and indirect air quality and health risk impacts from the relocated freight activities on nearby sensitive receptors in the Final EIS/EIR. RA-3-3

2. Recommend Project Design Features: In the Draft EIS/EIR, the Lead Agency is committed to implementing Mitigation Measure AQ-1 (Vehicle Emissions), which requires the use of on-road haul and vendor delivery trucks that meet 2010 emission standards and off-road construction equipment that meets Tier 4 emission standards. To be consistent with the provisions of the Metro Green Construction Policy, which applies to all Metro's construction activities and requires the use of next cleanest piece of equipment or vehicle, Mitigation Measure AQ-1 should be the starting point for the Proposed Project as a project design feature. Additionally, to further reduce the Proposed Project's construction emissions, if one of the Build Alternative is selected, South Coast AQMD staff recommends that the Lead Agency include new project design features in the Final EIS/EIR to require the use of zero-emission (ZE) or near-zero-emission (NZE) on-road haul trucks and Tier 4 Final or better off-road equipment during construction as they are the next cleanest construction equipment or vehicle envisioned in the Metro Green Construction Policy and are feasible to implement at the Proposed Project. RA-3-4

3. Additional Recommended Mitigation Measure: In the Draft EIS/EIR, the Lead Agency assumed that maximum daily truck activity would not exceed 150 hauling trucks and 100 material deliveries regardless of the Build Alternative ultimately selected and used this assumption to quantify the Proposed Project's construction emissions. South Coast AQMD staff recommends that the Lead Agency make this underlying assumption used in construction emission calculations a CEQA mitigation measure in the Final EIS/EIR. RA-3-5

4. Responsible Agency and South Coast AQMD Permits: In the Draft EIS/EIR, the Proposed Project's various construction and operational activities may involve the use of stationary source equipment that requires permits from South Coast AQMD. South Coast AQMD should be identified as a CEQA Responsible Agency for the Proposed Project in the Final EIS/EIR. RA-3-6

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Air Quality Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS:AM
LAC210803-11
Control Number

ATTACHMENT

South Coast AQMD Staff's Summary of Air Quality Analysis in the Draft EIS/EIR

In the Air Quality Analysis Section of the Draft EIS/EIR, the Lead Agency quantified the Proposed Project's maximum daily construction emissions and also quantified maximum daily operational emissions with and without the Proposed Project in future analysis year 2042. The Lead Agency compared both construction and operational emissions to South Coast AQMD's recommended regional air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be significant if Build Alternatives 1 or 2 is selected as the Proposed Project, with an estimated 118 pounds per day (lbs/day) of NOx emissions[3], which is above South Coast AQMD's CEQA significance threshold for regional construction NOx emissions at 100 lbs/day. Mitigation Measure AQ-1 would require the use of on-road diesel-fueled haul and vendor delivery trucks to meet 2010 emission standards to reduce construction-related NOx emissions; however, the Lead Agency found that Build Alternatives 1 and 2 would still result in significant and unavoidable air quality impacts with NOx emissions at 118 lbs/day during construction[4]. The Lead Agency also found that since the Proposed Project would reduce regional daily VMT, the Proposed Project's regional operational impacts in future analysis year 2042 for all Build Alternatives would result in a net reduction of regional emissions compared to the future analysis year without the Proposed Project. Therefore, regional operational air quality impacts for all Build Alternatives were found to be less than significant[5].

RA-3-7

In the Draft EIS/EIR, the Lead Agency also quantified the Proposed Project's localized construction emissions and compared them to the applicable South Coast AQMD's localized significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's localized construction air quality impacts would be less than significant[6].

South Coast AQMD staff's detailed comments on the CEQA air quality impacts analysis is provided as follows.

1. **CEQA Air Quality Analysis for Operational Impacts from Freight Relocation**

Based on the Draft EIS/EIR, approximately 8.1 miles of Build Alternatives 1, 2, and 3 and approximately 1.3 miles of Build Alternative 4 would require relocation and reconstruction of existing freight rail tracks[7]. The relocations would only differ by a few feet and would remain within the rail right-of-way, resulting in the freight tracks being relocated in proximity to sensitive receptors (i.e. residential units) at two locations, and at one of the locations, freight tracks would be brought within 50 feet from inhabited structures[8]. The Proposed Project is located in a densely populated area that includes three designated AB 617 communities. If any of the Build Alternatives is selected for the Proposed Project, relocation of freight rail tracks, which is a direct impact of the Proposed Project, has the potential to bring emissions from freight activities closer to sensitive receptors. Sensitive receptors are people that have an increased

RA-3-8

[3] Draft EIR. Appendix J Air Quality. Pages 7-6 to 7-10
[4] *Ibid*.
[5] Draft EIR. Chapter 4, Section 4.5. Air Quality. Pages 4-210 to 4-214.
[6] *Ibid*. Appendix J Air Quality. Pages 7-18 to 7-22.
[7] *Ibid*. Page 4-609.
[8] Draft EIS/EIR. Chapter 4, Section 4.7 Noise and Vibration. Page 4-254.

sensitivity to air pollution or environmental contaminants. Therefore, the environmental impacts associated with freight activities occurring at the relocation sites should be analyzed and disclosed in the Final EIS/EIR. The Lead Agency should provide more information on freight relocation and freight activities and analyze the direct and indirect air quality and health risk impacts from the relocated freight activities on nearby sensitive receptors in the Final EIS/EIR. If the direct and indirect air quality and health risk impacts from freight relocation are not included in the Final EIS/EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record. RA-3-8

2. **Recommended Project Design Features**

In the Draft EIS/EIR, the Lead Agency is committed to complying with the Metro Green Construction Policy. To further reduce emissions from off-road and on-road construction equipment during construction of Build Alternatives 1 and 2, the Lead Agency also committed to implementing Mitigation Measure AQ-1 (Vehicle Emissions), which requires the use of off-road construction equipment that meets Tier 4 emission standards and on-road construction haul and vendor delivery trucks that meet 2010 emission standards.

The Metro Green Construction Policy applies to all Metro's construction activities such as those for the Proposed Project's Build Alternatives, and the Policy requires the use of next cleanest piece of equipment or vehicle[9]. To be consistent with the Metro Green Construction Policy, South Coast AQMD staff recommends that the Lead Agency make the requirements outlined in Mitigation Measure AQ-1 the starting point for the Proposed Project. Additionally, to further reduce the Proposed Project's construction emissions, if one of the Build Alternative is selected, South Coast AQMD staff recommends that the Lead Agency include new project design features in the Final EIS/EIR to require the use of zero-emission (ZE) or near-zero-emission (NZE) on-road haul trucks and Tier 4 Final or better off-road equipment during construction as they are the next cleanest construction equipment or vehicle envisioned in the Metro Green Construction Policy and are feasible to implement during construction of the Proposed Project. The recommended additions and changes to Mitigation Measure AQ-1 are shown in underline and ~~strikethrough~~, respectively. RA-3-9

~~Mitigation Measure~~ Project Design Feature AQ-1 (Vehicle Emissions):

- Require the use of zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks (e.g. material or soil import/export trucks) such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule[10] and the Heavy-Duty Low NOx Omnibus Regulation[11], ZE and NZE trucks will become increasingly more available

[9] Los Angeles County Metropolitan Transportation Authority. July 21, 2011. Green Construction Policy. Accessed at: Green_Construction_Policy.pdf (metro.net).

[10] CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.

[11] CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus

to use, especially during the construction lifetime of the Proposed Project, which begins in 2022 and is anticipated to end in 2028. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require ~~O~~ on-road vehicles registered with the California Air Resource Board's 2010 engine emissions standards[12] of 0.01 grams per brake horsepower-hour (g/bhp-hr) of particulate matter and 0.2 g/bhp-hr of nitrogen oxide emissions ~~would~~ be used during construction. Include these truck requirements in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance. Operators would maintain records of all trucks associated with project construction to document that each truck used meets these emissions standards and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.

- Additionally, require that all ~~O~~off road vehicles or equipment greater than 50 horsepower (hp) shall ~~would~~ meet Tier 4 Final emission standards requirements, or better (e.g. near-zero emissions, or zero-emissions) at a minimum. Include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. Require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 Final or better engine certification, the project representative or contractor must demonstrate through future studies with written findings supported by substantial evidence that is approved by the lead agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.

RA-3-9

Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox.

[12] CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

- The Lead Agency should include and identify sufficient electricity supplies and necessary infrastructures to support the use of ZE or NZE technologies in the Final EIS/EIR, where appropriate.

RA-3-9

3. **Additional Recommended Mitigation Measure**

In the Draft EIS/EIR, the Lead Agency assumed that, "[…] maximum daily truck activity would not exceed 150 hauling trucks and 100 material deliveries" during the Proposed Project's construction, regardless of Build Alternative selected"[13]. This underlying assumption was used by the Lead Agency to quantify the Proposed Project's maximum daily construction emissions. Additionally, each Build Alternative is unique. For example, each Build Alternative will require different amounts of soil import and export ranging from 7,000 cubic yards of soil export to over 1,000,000 cubic yards of soil export[14]. To ensure that the Proposed Project's construction emissions from truck trips associated with soil hauling and material deliveries are not underestimated, if a Build Alternative is selected, South Coast AQMD staff recommends that the Lead Agency incorporate a new condition or mitigation measure in the Final EIS/EIR that will limit the amount of maximum daily truck activity to no more than 150 daily haul trucks and 100 daily material deliveries along the Proposed Project's corridor, regardless of Build Alternative.

RA-3-10

4. **Responsible Agency and South Coast AQMD Permits**

In the Draft EIS/EIR, Build Alternatives 1 and 2 will include underground construction activities which would involve a tunnel boring machine (TBM)[15]. TBMs are used to cut through rock and may require additional equipment such as a blending plant and storage silos, both of which require permits from South Coast AQMD. Additionally, the Proposed Project will include operation of one Maintenance and Storage Facility (MSF) that will house a traction power substation and a paint and body shop[16]. If stationary generators or coating spray booths are used during the MSF's operation, permits from South Coast AQMD are required. Therefore, the Final EIS/EIR should identify South Coast AQMD as a CEQA Responsible Agency for the Proposed Project. Any assumptions used in the Final EIS/EIR will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

RA-3-11

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIS/EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will

RA-3-12

[13] Draft EIR. Appendix J Air Quality. Page 7-4.
[14] *Ibid*.
[15] Draft EIS/EIR Chapter 4. Affected Environment and Environmental Consequences. Page 4-610.
[16] Draft EIS/EIR. Chapter 2. Project Description. Page 2-46.

not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the finding that the recommended project design features and additional mitigation measure are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIS/EIR (CEQA Guidelines Section 15091). RA-3-12

South Coast Air Quality Management District – RA-3

Comment ID	Response
RA-3-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
RA-3-2	This comment summarizes the commenter's understanding of project information. The comments are addressed individually in the responses that follow.
RA-3-3	As part of characterizing existing conditions for the Project, freight train activity along the segment of the freight tracks between Rosecrans Avenue and the I-105 freeway was monitored over nine days in 2019 (along with three other locations). The maximum number of daily freight trains recorded traversing this segment of the corridor to be relocated was four trains per day, which occurred on only a single day out of the nine. The typical freight train activity was one to two trains per day passing through the segment. An average of two trains per 24 hours will not result in an average daily diesel particulate matter emission rate that will pose long-term health concerns. At any given location along the corridor, each train pass-by will last for, at most, several minutes. Diesel particulate matter will be the carcinogenic risk driver for a health risk assessment at sensitive receptor locations along the freight track alignments, and there is no acute reference exposure level for diesel particulate matter. Therefore, exposure to diesel particulate matter are based on 24-hour average and annual average concentrations. Average 24-hour and annual average diesel particulate matter concentrations resulting from two daily train pass-bys lasting a couple of minutes each and relocated by 15 to 20 feet from their current location will be negligible from a health risk assessment perspective. Section 4.5.5.3 in the Final EIS/EIR and Section 6.3.2 in the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (previously Appendix J of the Draft EIS/EIR) have been updated to include this clarification.
RA-3-4	As a clarification of fact, Mitigation Measure AQ-1 (Vehicle Emissions) requires emission controls for on-road vehicles. The mitigation measure does not require off-road construction equipment to meet Tier 4 emission standards. The use of Tier 4 emission controls for off-road construction equipment was included in the unmitigated estimation of emissions per compliance with the Metro Green Construction Policy. As discussed in Chapter 4, Section 4.19.3.5 in the Draft EIS/EIR, the LPA (evaluated as Alternative 3 in the Draft EIS/EIR) will not result in significant construction emissions. The use of zero-emission or near-zero-emission trucks and/or off-road is not required to mitigate emissions.

Comment ID	Response
RA-3-5	Based on Metro's prior experience with construction of transit projects, the truck volumes associated with the LPA are reasonable planning assumptions for estimating emissions and based on periods of time where truck trips would be high; no significant impacts are identified; and a mitigation measure is not required. Construction activities, including equipment and typical work rates, are discussed in Section 4.19.2 in Chapter 4 of the Final EIS/EIR. The contractor will be required to comply with the conditions included in the Final EIS/EIR analysis. In January 2022, the Metro Board of Directors identified Alternative 3 as the LPA, but LA Union Station was identified as the ultimate northern terminus for the corridor. Alternative 3 is identified as the LPA in the Final EIS/EIR. As shown in Table 4.19.10 of the Draft EIS/EIR, maximum daily regional emissions during construction of Alternative 3 will not exceed regional SCAQMD thresholds. Under CEQA, mitigation measures are only required when a potentially significant impact has been identified; therefore, the suggestion in this comment does not warrant the creation of a new mitigation measure for the Final EIS/EIR. As described in Section 7.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (Appendix J of the Draft EIS/EIR), the methodology for the LPA involves the parameters that no more than 120 haul truck trips and no more than 80 material deliveries occur to and from LPA construction sites per day, based on Metro resource allocations and availabilities. The average daily truck volume would be less.
RA-3-6	The commenter is correct that the Project would likely require permits issued by SCAQMD. SCAQMD requested to be listed as a Responsible Agency following the Notice of Preparation pursuant to CEQA issued on May 25, 2017. This request was noted and included in Chapter 7, Section 7.2.2 of the Draft EIS/EIR. Metro and/or the construction contractor will apply for permits during the final design process for the Project. All applicable permitting analyses will be completed at that time for submittal to SCAQMD.
RA-3-7	The comment correctly summarizes the finding from the Draft EIS/EIR corresponding to Alternatives 1 and 2. Refer to response CR-GEN-1 regarding identification of Alternative 3 by the Metro Board as the LPA.
RA-3-8	See response CR-AQ-2 regarding dust during project operation. Long-term operation of the LPA will result in a decrease in particulate matter and dust emissions at the regional scale compared to the No Build Alternative, as summarized in Table 4.5.12 in Chapter 4, Section 4.5.3.4 of the Draft EIS/EIR. This reduction is attributed to the reduction in on-road vehicle miles traveled. Operation of the LPA will not increase the frequency of freight train operations anywhere along the corridor, and freight train dust emissions will not increase relative to existing conditions. Refer to the response to comment RA-3-3 regarding the frequency of freight trains. Because implementation of the LPA will not increase the frequency of freight train activities anywhere along the corridor, the average daily emission rate of diesel particulate matter from freight train propulsion will not increase near the sensitive receptors as a result of the Project. Emissions produced by two locomotives passing by per day are intermittent and of very minor magnitude given that the trains will be within 50 feet of the residences for only a matter of minutes per day. Furthermore, relocating the existing train tracks by 15 to 20 feet will not increase particulate emissions from freight train movements and will not substantially alter dust deposition from those movements. The response to comment RA-3-3 also provides information regarding diesel particulate matter and proximity to sensitive receptors.

Comment ID	Response
RA-3-9	Refer to response CR-GEN-1 regarding identification of Alternative 3 as the LPA. No potentially significant air quality impacts were identified during construction or operation for this alternative in the Draft or Final EIS/EIR. Mitigation Measure AQ-1 (Vehicle Emissions) was identified for construction of Alternatives 1 and 2 and required emission controls for on-road vehicles. This mitigation measure does not require off-road construction equipment to meet Tier 4 emission standards. The use of Tier 4 emission controls for on-road vehicles was included in the unmitigated estimation of emissions per compliance with the Metro Green Construction Policy. Beginning in January 2023, commercially operated heavy-duty trucks (including construction haul trucks) are required to comply with the 2020 U.S. Environmental Protection Agency emissions standards as a regulatory default baseline. The LPA will not result in significant construction emissions, and the use of zero-emission or near-zero-emission trucks and/or off-road equipment is not required to mitigate emissions; therefore, mitigation is not required, including mitigation related to near-zero-emission vehicles.
RA-3-10	See response to comment RA-3-5.
RA-3-11	See response to comment RA-3-6.
RA-3-12	Responses to all public comments are provided in Appendix D of the Final EIS/EIR. All responses to comments identify whether changes were made to the text in the Final EIS/EIR and/or impact analysis report, and an explanation if revisions were not required. Responses do not include conclusionary statements that are unsupported by information.

ELECTED OFFICIALS

14th Council District (Nate Hayward)

From: Nate Hayward <nate.hayward@lacity.org>
Sent: Tuesday, September 28, 2021 11:29:16 PM
To: Khanna, Meghna <KhannaM@metro.net>
Subject: CM KDL WSAB DEIR Comment Letter

Hi Meghna,
Please see attached.

EO-3-1

Thanks!

--
Nate Hayward
Policy & Capital Projects Director
Office of Councilmember Kevin de LeÓn
200 N. Spring Street, Suite 425
Los Angeles, CA 90012
Cell: (323) 383-4906
e-mail: nate.hayward@lacity.org

Kevin de León
Councilmember, Fourteenth District

September 28, 2021

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

RE: West Santa Ana Branch Draft EIR

Dear Ms. Khanna,

I am writing to provide feedback on the West Santa Ana Branch (WSAB) Transit Corridor proposed by Metro. After reviewing the Draft Environmental Impact Report (DEIR), I must strongly oppose both the Staff Preferred Alternative 3 as well as Alternative 4. Neither of these proposed routes takes the WSAB to Downtown which was one of the principal goals of the project. Building the project to Slauson or to the 105 Freeway is the same concept as building the Green Line to end before reaching LAX - it is a decision that might make sense in the short term but will have long term consequences. EO-3-2

<u>Taking the Route to Downtown</u>
Metro needs to environmentally clear the project all the way to Downtown Los Angeles, which is why Alternatives 1 and 2 are the better options. Alternatives 3 and 4 terminate well south of Downtown Los Angeles and will force multiple transfers to get to Downtown. Furthermore, 37% of the project's funds come from the Metro Central Subregion, but the staff recommendation is to terminate the project at Slauson which doesn't even reach the Metro Central Subregion. If the Metro Central Subregion is spending a portion of its Measure M funding allotment on this project, then it deserves to reap the benefits of the project. EO-3-3 EO-3-4

Accelerating the Project

While I understand that funding is a major reason for breaking the project into phases, it is shortsighted and doesn't consider creative ways to get the project done faster. For example, Metro should look at alternative design solutions north of the Washington Boulevard that reduce cost while not negatively impacting the community. It should also look at partnering with the city on the Enhanced Infrastructure Financing District (EIFD) being considered for Downtown Los Angeles to ensure both the City and LA County contribute to fund the WSAB. EO-3-5

Addressing the Flower Bottleneck

With the pending completion of the Regional Connector, much more of Downtown will be accessible by train. Despite this, Metro has failed to adequately study and propose solutions for the portion of the Expo/Blue line from Metro Center to the Washington/Flower Wye. This section runs at grade along Flower Street and will experience further delays if the WSAB is built to Slauson. Furthermore, the Pico Station is woefully inadequate for a station that serves LA Live and the Staples Center and will serve as a major transit hub for the 2028 Olympics. Metro must immediately begin a comprehensive study of this area to upgrade the Pico Station and improve delays along Flower Street. EO-3-6 EO-3-7

Impacts to Little Tokyo

Of particular concern is the proposed impacts to Little Tokyo. Little Tokyo has experienced more Metro construction over the past 18 years than any other neighborhood in the County. From 2004 to 2009, the Gold Line Eastside Extension was constructed through the neighborhood. Beginning in 2012 and lasting until 2022, the Regional Connector project has been undergoing construction. That leaves only three years over an 18 year period where Little Tokyo will not be experiencing Metro construction. This level of impact to one neighborhood is unacceptable. EO-3-8

Project Mitigations

Furthermore, construction of the project must happen in a way that minimizes impacts to the community by implementing robust mitigation measures including, but not limited to, the following: EO-3-9

Aesthetics

- Aesthetic treatments along the rail right of way that fit the character of the neighborhood and minimize the visual blight of the trains and accompanying infrastructure
- All alternatives shall have no above ground impacts in and adjacent to Little Tokyo including but not limited to: utility relocation, right of way acquisition, cut-and-cover trenching, grouting, and temporary traffic control EO-3-10

Land Use and Planning EO-3-11

- Minimizes right of way acquisition of privately owned properties
- Does not cross over or under the City of Los Angeles Mangrove property at 1st Street and Alameda EO-3-12

Noise

- Ample noise mitigation measures such as sound-absorbing materials are used to prevent noise pollution in the residential neighborhoods the route goes through

EO-3-13

Population and Housing

- A Business Interruption Fund that serves the whole neighborhood and not just businesses immediately adjacent to the project route
- Allowing new businesses the ability to access the Business Interruption Fund instead of just those who have been around for over two years

EO-3-14

- Continuation of the Metro-funded Go Little Tokyo marketing campaign to help support businesses affected by construction
- Continuation of the small business counselor program to provide support for businesses before, during, and after construction

EO-3-15

- Development of an anti-displacement plan that facilitates keeping residents and businesses impacted by increased rents post-construction from being forced out of the neighborhood

EO-3-16

Transportation and Traffic

- Construct multimodal infrastructure adjacent to the project stations consistent with Metro's 1st/Last Mile Plan and the City of Los Angeles Mobility Plan and Complete Streets Design Guide

EO-3-17

- Constructed via a Tunnel Boring Machine (TBM) and not Cut-and-Cover throughout all of Little Tokyo

EO-3-18

- Mitigates parking loss during construction by providing alternative parking locations or shuttle service to affected communities

EO-3-19

- A parking validation program that provides offsite parking for businesses who lose parking during construction

EO-3-20

- Should Alternative 1 be chosen, a robust community process should be conducted to determine whether or not a station should be placed in Little Tokyo, and if so, how it can be constructed to minimize community impacts

EO-3-21

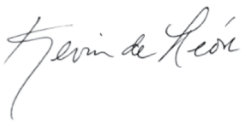
I am pleased that Metro is moving this project forward, but I am concerned about the shortsighted decision to approve a project that doesn't even reach the City of Los Angeles. Metro must approve an Alternative that terminates in Downtown Los Angeles and not cut the project short. Furthermore, Metro needs to address valid concerns raised by stakeholders by implementing a more robust mitigation plan to minimize the negative impacts of the project.

EO-3-22

EO-3-23

Should you have any questions, please contact Nate Hayward, Policy & Capital Projects Director, from my office at (323) 383-4906 or via email at Nate.Hayward@lacity.org.

Sincerely,



KEVIN DE LEÓN
City of Los Angeles, Fourteenth Council District

14th Council District – EO-3

Comment ID	Response
EO-3-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
EO-3-2	The commenter's opposition to Alternative 3 (referred to in the Final EIS/EIR as the LPA) and Alternative 4 has been noted. Refer to response CR-GEN-1 regarding Metro Board identification of the Locally Preferred Alternative (LPA) and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo. Alternative 3 will provide connection to downtown via transfer at the Slauson/A Line Station to the A Line. As illustrated in Table 6.2 in Chapter 6 of the Draft EIS/EIR, Alternative 3 will provide substantial benefits to transit users and reduce regional vehicle traffic, but to a lesser extent than Alternatives 1 or 2. Section 6.2 of the Draft EIS/EIR provides an explanation of the considerations in identifying Alternative 3 as the recommended alternative stating that "[i]n addition to considering the effectiveness in meeting the Purpose and Need and environmental impacts and benefits, the financial capacity to construct, operate, and maintain the Project as well as strategies to fund the Project were primary considerations in determining the staff preferred alternative." After public distribution of the Draft EIS/EIR and considering public comment, the Metro Board of Directors identified Alternative 3 as the LPA, but LA Union Station was identified as the ultimate northern terminus for the corridor in the future.
EO-3-3	See response to comment EO-3-2. A financially constrained funding plan is currently not available for the extension to LA Union Station north of the Slauson/A Line Station. Based on discussions with the Federal Transit Administration, the Record of Decision will be issued on the financially feasible alternative. During the January 2022 meeting, the Metro Board identified LA Union Station as the ultimate terminus for the corridor in the future. By direction of the Metro Board of Directors, Metro staff were directed to identify and evaluate a more cost-effective alignment between the Slauson/A Line Station and LA Union Station, in light of the funding gap, and to re-engage the community to best define a transit solution, including alignment profile, station locations, and design, that meets the changing mobility needs of Little Tokyo, the Arts District, LA Union Station, and surrounding area residents, employees, and businesses. In response to the Board Motion, a standalone study, the *West Santa Ana Branch Transit Corridor Project Slauson/A Line to LA Union Station Segment Study,* is underway. This standalone study does not include discussion of the LPA. While Alternatives 1 and 2 identified in the Draft EIS/EIR remain under consideration, modifications to those alternatives made in response to the standalone study, or as a result of design refinements, would be the subject of a future environmental document.
EO-3-4	The funding plan for the LPA does not include the $400 million of funding (in 2015 dollars) associated with the Central City Area subregion, as defined in the Measure M Ordinance (refer to Appendix F of this Final EIS/EIR for a summary of the funding plan). The Measure M funding for the LPA only includes the amount associated with the Gateway Cities subregion.
EO-3-5	See responses to comments EO-3-2 and EO-3-3. Metro is conducting the downtown study mentioned in response CR-GEN-1 to identify a more cost-effective alignment between the Slauson/A Line Station and Union Station. Metro will continue to coordinate with City of Los Angeles and key stakeholders on efforts related to the Enhanced Infrastructure Financing District as part of efforts related to a future extension to LA Union Station.

Comment ID	Response
EO-3-6	The comment was written prior to the start of Regional Connector service. Operations on the Metro A (Blue) Line have changed with the start of Regional Connector service. The Slauson/A Line Station and WSAB alignment were designed to avoid operational impacts to A Line trains, as the two lines will operate on separate tracks. Additionally, the stations between the two lines will be connected by two pedestrian bridges in order to disperse riders transferring between the lines, thereby minimizing dwell times and impacts to reliability related to the increased transfer activity. As the Slauson/A Line Station is the northern terminus of the LPA, it is not anticipated that the LPA would affect operation of the A Line where the line is street running.
EO-3-7	The comment does not raise any environmental issues or pertain to the adequacy of the Draft EIS/EIR. Modifications to the Pico Station are beyond the Purpose and Need of the WSAB Project.
EO-3-8	Refer to response CR-GEN-6. Construction of the LPA will not involve construction activities in the Little Tokyo community.
EO-3-9	Chapter 4, Section 4.4, of the Draft EIS/EIR provides an analysis of the potential impacts the Project will have on visual and aesthetics. Tables 4.4.4 through 4.4.8 in Section 4.4.3 of the Draft EIS/EIR identify the project components and evaluate how these components will change the visual character and quality for each landscape unit along the alignment. As discussed, project components will not detract from, and will be compatible with, the visual character and quality of the Affected Area, including the rail ROWs, which currently have active freight north of Somerset Boulevard. Additionally, Project Measures VA PM-1 (Design Standards), VA PM-2 (Public Art), VA PM-3 (Landscaping), and VA PM-4 (Landscaping Screening), discussed in Section 4.4.4.1 of the Draft EIS/EIR, will be implemented. Project components will be designed per the Metro Rail Design Criteria and Metro's Systemwide Station Design Standards and will include public art. New landscaping will be installed consistent with the Metro Rail Design Criteria and Metro's Systemwide Station Design Standards, and traction power substations in residential areas will be landscaped or incorporate design features to screen or improve the appearance of structures.
EO-3-10	See response to comment EO-3-8.
EO-3-11	Property acquisitions have been minimized where feasible, and residential relocation was a major consideration when the alignment was designed. See response CR-DIS-1 regarding compliance with the Uniform Act and California Relocation Act. As compliance with the Uniform Act and California Relocation Act are federal and state requirements, they are not considered mitigation. The LPA will affect more parcels and require more full and partial acquisitions compared to Alternative 3 as evaluated in the Draft EIS/EIR; however, the LPA will displace fewer businesses and residential units compared to Alternative 3. Project refinements were made to avoid affecting existing structures where feasible, which resulted in a decrease in business and residential displacements.
EO-3-12	See response to comment EO-3-2. The LPA's northern terminus at the Slauson/A Line Station will not be located in the 14th Council District or near the 1st Street and Alameda property referenced in the comment.
EO-3-13	See responses to comments EO-3-2 and EO-3-12. Noise and vibration mitigation measures to reduce potentially significant noise and vibration effects that will occur during construction and operation were identified in Chapter 4, Sections 4.19.3.7 and 4.7.4.2 of the Draft EIS/EIR, respectively.

Comment ID	Response
EO-3-14	Guidelines and eligibility for Metro's Pilot Business Interruption Fund are set by Metro's Board of Directors. At present, the Metro Board of Directors has not approved the Business Interruption Fund for this Project. When and if the Metro Board of Directors considers a Business Interruption Fund for this Project, questions about eligibility and scope can be addressed. Consideration by the Metro Board would occur after certification of the Final EIS/EIR and closer to the start of construction.
EO-3-15	See response to comments EO-3-2 and EO-3-8.
EO-3-16	Land use controls within the station areas lie with the local jurisdictions. The Project is a regional light rail transit system that will connect southeast LA County with other portions of LA County, serving cities and communities along the alignment and jurisdictions directly surrounding the alignment. The Project will provide local jurisdictions with opportunities to plan future land use patterns locally, including preservation or development goals appropriate for each community.
EO-3-17	Consistent with the Metro First/Last Mile (FLM) Guidelines, Metro will continue to coordinate with the City of Los Angeles regarding FLM connections. Cities are responsible for advancing the design, environmental clearance, construction, and maintenance of FLM improvements.
EO-3-18	See response to comments EO-3-2 and EO-3-8. Use of a TBM and/or cut-and-cover construction is not required for construction of the LPA because the LPA is entirely above ground.
EO-3-19	See response to comments EO-3-2 and EO-3-8. The LPA will not result in a loss of parking in the Little Tokyo community. Mitigation Measure TRA-23 (Loss of Parking [Construction]), described in Chapter 3, Section 3.7.3.8 of the Draft EIS/EIR, will be implemented where parking is temporarily removed during construction.
EO-3-20	See response to comment EO-3-19.
EO-3-21	See response to comments EO-3-2 and EO-3-8 and response CR-GEN-1. As part of the January 2022 Board meeting, the alignment north of the Slauson/A Line Station would include a station in Little Tokyo.
EO-3-22	The comment does not raise any environmental issues or pertain to the adequacy of the Draft EIS/EIR. See responses to comments EO-3-2 and EO-3-3.
EO-3-23	Mitigation measures have been identified as feasible to address adverse impacts pursuant to the National Environmental Policy Act and/or significant impacts pursuant to the California Environmental Quality Act. These mitigation measures are identified in the applicable sections of Chapters 3 and 4 of the Draft EIS/EIR. The mitigation measures will also be documented in a Mitigation Monitoring and Reporting Program that will be included with the Record of Decision and adopted by the Metro Board. See also response CR-GEN-5.

Labor, Health and Human Services, and Education,
Vice Chairwoman

Leader's Council

Congressional Hispanic Caucus

Smithsonian Institution, Board of Regents

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September 28, 2021

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

EO-1-1

Dear Ms. Khanna:

I am writing to express my strong support for Alternative 1, the Pioneer Station to Los Angeles Union Station route, and Design Option 2, which includes the addition of the Little Tokyo Station, as the Locally Preferred Alternative (LPA) for the West Santa Ana Branch project. As you may know, this option is supported by the Eco-Rapid Transit.

EO-1-2

Since 2002, Eco-Rapid Transit (ERT), also known as the Orangeline Development Authority has been the leading advocate for the WSAB project. Eco-Rapid Transit consists of 12 members including Artesia, *Bell*, *Bell Gardens*, Cerritos, *Cudahy*, *Downey*, Glendale, *Huntington Park*, *Maywood*, *Paramount*, South Gate and the Burbank Glendale Pasadena Airport Authority. The seven cities in Italics are in my 40th Congressional District. The members have consistently supported a one-seat ride to Union Station (Alternative 1) because of its transit ridership and regional connectivity.

EO-1-3

Alternative 1 provides the most direct route from the Southeast Los Angeles cities to Union Station and northeast Los Angeles County. The long-term plan is to have the light rail line continue north to Burbank and the Hollywood Burbank Airport. Design Option 2 would allow riders the opportunity to transfer in Little Tokyo and travel to West Los Angeles/Santa Monica, or to East Los Angeles without having to ride into Union Station.

EO-1-4

In addition to supporting Alternative 1 and Design Option 2, I also write to express my concern about several items. The ERT recognizes the challenges of obtaining sufficient funding to build this project; they are committed to partnering with Metro to seek and secure financial options to help Metro keep their Measure M promise to the Southeast communities. However, it is also important to address the *cost* with the *need* to create a high-quality sustainable light rail transit line that can provide 100 years of service.

EO-1-5

At the present, there is no mass transit system, or rapid bus line, that serves these communities. Thus, for Southeast Los Angeles residents, building this project is also an issue of fairness and equity. As an Environmental Justice community, the Southeast

EO-1-6

deserves to be treated fairly and given the same consideration as Metro projects that have been serving other areas of Los Angeles County for the past 20 years. As a Justice40 project, under the Biden Administration, we must recognize the importance of moving forward quickly together. EO-1-6

As I have mentioned publicly, I also support ERT's development of the proposed station at the Rio Hondo Confluence. While it may be difficult to include this station in the current analysis, the current design and analysis must not preclude it, which can be studied as an amendment or a supplement to the current Draft Environmental Impact Report/Statement. As a long-time supporter of the Los Angeles River Revitalization project, I believe we would be remiss and shortsighted if we do not build a station at this location. EO-1-7

I am also requesting that Bell Gardens and Maywood be included in all analyses as identified in the WSAB Transit Corridor Study Area map and in pages 1-4, 1-6 and 1-7. The EIR/EIS needs to include connectivity from the WSAB stations to Bell Gardens and Maywood. Both communities need to be included in first mile/last mile analysis as described in the FTA/Metro/Eco-Rapid Transit/South Gate TOD SIP. EO-1-8

While the member cities of the ERT support the project, there is some concern about being able to provide the 3% local match, especially after losing tax revenues due to the COVID-19 pandemic. I ask that Metro work with the cities on identifying non city general funds that can recognized as that match. Additionally, it is my understanding that the ERT requests that the southeast cities only be required to pay its share of the 3 percent local contribution for the first operating segment in Gateway Cities from Artesia to Slauson. EO-1-9

Finally, I strongly encourage Metro to provide all courtesies to the WSAB and Eco-Rapid Transit member cities that have been afforded to previous and current projects. EO-1-10

Thank you for your consideration.

Sincerely,

Lucille Roybal-Allard

LUCILLE ROYBAL-ALLARD
Member of Congress

40th Congressional District – EO-1

Comment ID	Response
EO-1-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
EO-1-2	The commenter's support for Alternative 1 and Design Option 2 has been noted. See response CR-GEN-1 regarding identification of the Locally Preferred Alternative (LPA) and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo. As illustrated in Table 6.2 in Chapter 6 of the Draft EIS/EIR, Alternative 3 will provide substantial benefits to transit users and reduce regional vehicle traffic, but to a lesser extent than Alternatives 1 or 2.
EO-1-3	See response to comment EO-1-2. Chapter 6, Section 6.2 of the Draft EIS/EIR provides an explanation of the considerations in identifying Alternative 3 as the recommended alternative stating that "[i]n addition to considering the effectiveness in meeting the Purpose and Need and environmental impacts and benefits, the financial capacity to construct, operate, and maintain the Project as well as strategies to fund the Project were primary considerations in determining the staff preferred alternative." After public distribution of the Draft EIS/EIR and considering public comment, the Metro Board of Directors identified Alternative 3 as the LPA, but LA Union Station was identified as the ultimate northern terminus for the corridor.
EO-1-4	See response to comment EO-1-2. Chapter 2, Section 2.4 of the Draft EIS/EIR discusses the identification of the WSAB corridor. Appendix A of the Draft EIS/EIR provides additional information on alternatives considered and eliminated. Metro has studied a potential rail line to Burbank Airport from Union Station; however, this is not part of the WSAB Project. Continued analysis of this segment would occur as a separate project. LA Metro provides service to the Burbank Airport through Metrolink's Antelope Valley Line, which can be accessed through transfer at Union Station.
EO-1-5	Metro is appreciative of congressional support for its program and specifically for the WSAB Project. To deliver this Project, Metro will require federal financial support in the form of a New Starts Capital Investment Grant, for which Measure M funds will serve as the federally required local match. The Project is being designed to meet Federal Transit Administration design life requirements.
EO-1-6	Metro is dedicated to expanding the regional transit network and providing a project that will establish a reliable transit service and address mobility and access constraints faced by transit-dependent communities and environmental justice communities.
EO-1-7	The commenter's request for a station at the Rio Hondo Confluence is noted. The project alignment has been designed not to preclude a future station at the Rio Hondo Confluence. Any station at the Rio Hondo Confluence would require additional environmental review, which could be completed either by supplementing the environmental documentation for the WSAB Project or as a separate analysis, depending on when planning for the station is advanced.

Comment ID	Response
EO-1-8	The Study Area for the Project encompasses a 2-mile buffer from the project alignment, which includes the Cities of Bell Gardens and Maywood. The Study Area maps and discussions in Chapters 1 and 2 of the Draft EIS/EIR and Final EIS/EIR correctly include Bell Gardens and Maywood within this buffer. Current and projected Study Area characteristics within the full 2-mile buffer, such as traffic conditions, transit service and demand, population and employment densities, and travel demand, were considered and informed the Project's Purpose and Need in Chapter 1. Each individual section of the environmental document defines a specific Affected Area that is appropriate for that particular subject. The extent of the Affected Area for each topic is included in Chapter 4, Table 4.0.1 of the Draft EIS/EIR. Both cities are included in the First/Last Mile planning efforts that examined safe bike connections to the surrounding community within 3 miles of project stations. Both cities are located within 2 miles of the Project and are included in these planning efforts.
EO-1-9	The comment does not raise any environmental issues or pertain to the adequacy of the Draft EIS/EIR. Refer to the response CR-FIN-1.
EO-1-10	See response to comment EO-1-6.

44th Congressional District (Sean Kearns)

From: Kearns, Sean <Sean.Kearns@mail.house.gov>
Sent: Tuesday, September 21, 2021 9:52 AM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Dernoga, Matt <Matt.Dernoga@mail.house.gov>; Camacho, Patricia <Patricia.Camacho@mail.house.gov>; BarraganLegislation.Letters <BarraganLegislation.Letters@mail.house.gov>; Forsythe, Liam <Liam.Forsythe@mail.house.gov>
Subject: Rep. Barragán letter: West Santa Ana Branch Transit Corridor

Good Morning Mrs. Khanna,

I hope this message finds you well. Attached is a letter from Rep. Barragán regarding LACMTA's selection of a Locally Preferred Alternative for the West Santa Ana Branch Transit Corridor. If you have any questions, please do not hesitate to contact me.

EO-2-1

Thank you,

Sean Kearns | Field Representative
U.S. Representative Nanette Diaz Barragán (CA-44)
302 W 5th Street, Suite 201, San Pedro, CA 90731
Office: 310-831-1799| Fax: 844-273-0996
barragan.house.gov |

NANETTE DIAZ BARRAGÁN
44TH DISTRICT, CALIFORNIA
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COMMITTEE ON ENERGY AND COMMERCE

COMMITTEE ON HOMELAND SECURITY

CONGRESSIONAL HISPANIC CAUCUS

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House of Representatives
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SOUTH GATE, CA 90280

September 16, 2021

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

RE: West Santa Ana Branch Transit Corridor

Dear Mrs. Khanna:

I write in regard to the Los Angeles County Metropolitan Transit Authority's (LACMTA) upcoming selection of a Locally Preferred Alternative (LPA) for the West Santa Ana Branch (WSAB) Transit Corridor.

The WSAB Transit Corridor is an important opportunity to enhance transit equity in the underserved communities of Southeast Los Angeles. As LACTMA considers selecting an LPA from the four alternatives presented in the project's Draft Environmental Impact Statement, I urge you to consider the transportation and environmental challenges experienced by residents of Southeast Los Angeles County, as well as previous statements made by LACTMA regarding this transformative project. During an April 2017 briefing, LACMTA presented a document titled *Measure M: The Los Angeles County Traffic Improvement Plan* which included a new 20-mile light rail line from the City of Artesia to Union Station in the City of Los Angeles. EO-2-2

To follow through on this commitment to the community. it is imperative for LACMTA to select Alternative 1, which would travel from Pioneer Station in the City of Artesia to Los Angeles Union Station, as the LPA. Alternative 1 is consistent with LACTMA's prior statement and most effectively addresses the transit inequities impacting many Southeast Los Angeles County residents. EO-2-3

My district, which includes the City of South Gate and neighboring communities in Southeast Los Angeles County, is disproportionately impacted by the lack of public transit options. In a region where many residents are dependent on public transit to travel to and from their employment and other essential destinations, a direct route from Southeast Los Angeles County to Los Angeles Union Station is vital. EO-2-4 Additionally, the communities of this region are overwhelmingly burdened by air pollution, incompatible land use, and a myriad of other environmental injustices. By selecting Alternative 1, LACTMA can demonstrate their solidarity to the community by to improving public transit accessibility and correcting decades of underinvestment. EO-2-5

As the Representative of California's 44th Congressional District, I respectfully request LACTMA's thorough consideration of selecting Alternative 1 as the WSAB Transit Corridor LPA. EO-2-5

Sincerely,

Nanette Diaz Barragán

Nanette Diaz Barragán
Member of Congress

44th Congressional District – EO-2

Comment ID	Response
EO-2-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
EO-2-2	See response CR-GEN-1 regarding identification of the Locally Preferred Alternative (LPA) and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo. Metro is dedicated to expanding the regional transit network and providing a project that will establish a reliable transit service and address mobility and access constraints faced by transit-dependent communities and environmental justice communities.
EO-2-3	The commenter's support for Alternative 1 has been noted. See response to comment EO-2-2. As illustrated in Table 6.2 in Chapter 6 of the Draft EIS/EIR, Alternative 3 will provide substantial benefits to transit users and reduce regional vehicle traffic, but to a lesser extent than Alternative 1. A financially constrained funding plan is currently not available for the extension to LA Union Station north of the Slauson/A Line Station. As discussed in response CR-GEN-1, a separate study is being conducted to analyze more cost-effective alignments to reach Union Station and advance the environmental process.
EO-2-4	See response to comment EO-2-2 and EO-2-3. Environmental Justice impacts are discussed in Chapter 4, Section 4.22 of the Draft EIS/EIR.
EO-2-5	See responses to comments EO-2-2 and EO-2-3. Air quality effects are discussed in Chapter 4, Section 4.5 (operations) of the Draft EIS/EIR. Environmental Justice impacts are discussed in Chapter 4, Section 4.22 of the Draft EIS/EIR.

CORRIDOR CITIES

City of Artesia

Please see a letter and attached comments from the City of Artesia.

CC-3-1

THE CITY OF ARTESIA, CALIFORNIA

18747 CLARKDALE AVENUE, ARTESIA, CALIFORNIA 90701
Telephone 562 / 865-6262
FAX 562 / 865-6240

"Service Builds Tomorrow's Progress"

September 28, 2021

Los Angeles County Metropolitan Transportation Authority
Attn: Meghna Khanna, Project Manager
One Gateway Plaza
Los Angeles, CA 90012

RE: Public Comment Letter for the Los Angeles County Metropolitan Transportation Authority's ("Metro") Draft Environmental Impact Study/Report released for West Santa Ana Branch Transit Corridor (WSAB DEIS/DEIR) 60-day Public Review and Comment Period closing September 28, 2021

Dear Metro Board Members:

This letter is sent on behalf of the City of Artesia ("City"). While the City is not opposed to the West Santa Ana Branch Transit Corridor project ("Proposed Project"), it is very disappointing to see the Lead Agency has chosen to move forward with various project elements that Metro failed to discuss with the City in advance, such as the closure of 187th Street--which the City does not support. It is also disappointing that Metro has not definitively demonstrated or justified the preclusion of a below grade alignment within the City, which the City prefers to reduce impacts to the City of Artesia. CC-3-2

The WSAB DEIS/DEIR contains a high-level analysis that would typically determine where to further provided detailed environmental review and does not adequately address potential environmental impacts as required under CEQA. Several impact responses do not clearly indicate why a particular issue would not result in a significant impact and would not require further evaluation or are not even discussed. For example, the amount of vague and generalized information within the document does not adequately show how potential impacts from improvements not yet designed would be mitigated and compliant with local standards by the governing jurisdiction. CC-3-3 The City is concerned that the level of analysis provided within the WSAB DEIS/DEIR does not adequately address potential impacts to the City's residents, especially those located adjacent the proposed alignment, as well as sensitive uses within the affected area and immediate vicinity of the project CC-3-4

area. The Metro Guideline on Station location specifies that a one-half mile radius impact area should be analyzed, which was not done for the proposed Pioneer Station. CC-3-4

Due to the inadequate analysis presented in the WSAB DEIS/DEIR, the City of Artesia expects that the WSAB DEIS/DEIR will be revised and recirculated for public comment pursuant to CEQA Guidelines Section 15088.5(a)(4) once the comments are responded to and additional analysis is completed. CC-3-5

The City of Artesia strongly prefers Alignment 1, Design Option 2 as the Locally Preferred Alternative, and requests additional project-level environmental review for the chosen LPA. CC-3-6

Attachment A – *City of Artesia Public Comments* is for Metro's response. In the meantime, please do not hesitate to contact the undersigned with any questions regarding this correspondence.

Sincerely,

Fiona Graham, Planning Manager
The City of Artesia
18747 Clarkdale Ave, Artesia, CA 90701

Comment No.	General Comments	
1	**The WSAB DEIS/DEIR is insufficient for purposes of CEQA.** Additional detail is required for potential impacts surrounding the proposed development within the City of Artesia. Each impact section should detail how the proposed project would impact the City of Artesia as it relates to that section (i.e., aesthetics, water resources, construction impacts, etc.).	CC-3-7
2	**The City of Artesia strongly prefers Alternative 1, Design Option 2, due to the direct route from Artesia to downtown Los Angeles, and specifically Union Station, without the need for passengers to change lines/trains.** By providing a direct route from the southern terminus of the proposed line to the City of Los Angeles, there would be a greater number of residents and visitors willing to use the line for travel purposes because obstacles, such as changing trains and lines, would be reduced. Projected boardings are shown as highest for the direct route of Alternatives 1 and 2 (Appendix II, p. 5-6). **The City strongly recommends that all Alternatives be proposed as either underground or trenched throughout their alignment within the City of Artesia. The City opposes both at-grade and aerial track within the City of Artesia limits.** The draft document does not adequately substantiate why an underground alignment in the City of Artesia is infeasible. The at-grade Pioneer Station is acceptable; however, from there the track should be below grade. This would limit the amount of traffic impacts within the City at proposed at-grade crossings**. In addition to complying with the Metro at-grade train policy, a train and vehicle traffic frequency analysis should be performed.**	CC-3-8 CC-3-9
3	**The City of Artesia does not support the closing of 187th Street under any Alternative proposed. The closure of 187th Street will economically and physically divide the City in half with the WSAB project.** 187th Street is the main east-west connecting street at the City's South City Limit boundary. This corridor connects residents and visitors both in vehicles and as pedestrians to the City's commercial shopping centers located south of South Street and along Pioneer Boulevard.	CC-3-10
4	**The proposed parking structure should comply with the pedestrian orientation of Pioneer Boulevard, consistent with the City's General Plan objectives and policies for Pioneer Boulevard. The parking structure's design should include commercial tenant space at the ground level on the Pioneer Boulevard frontage for commercial uses.** The City should have exclusive control of the commercial tenant spaces. The space should be conditioned and designed to allow for restaurant uses (e.g., ceiling heights that allow for restaurant HVAC equipment) in addition to general commercial uses. The Pioneer frontage of the proposed structure should be consistent with the pedestrian feel of surrounding development and consistent with the General Plan policies outlined below. This information should be within the WSAB DEIS/DEIR. **The City requests operational and maintenance control of the parking structure either by itself or through a corridor-wide parking authority to be established with station cities, which should be incorporated into the Master Cooperative Agreement between Metro and the City of Artesia.**	CC-3-11
5	**The document does not analyze consistency with the following General Plan policies that apply to the Proposed Project.** • The proposed parking structure and Pioneer station improvements would be located on parcels with the Pioneer Boulevard Commercial designation. The draft document should show how the project would be consistent with the following:	CC-3-12

Comment No.	General Comments	
	Pioneer Boulevard Commercial ○ The Pioneer Boulevard Commercial designation encourages locally serving commercial retail development that enhances functional integration and buffering of adjacent single-family neighborhoods. Integrated, mixed-use commercial and residential development that provides residential development and complimentary, pedestrian-friendly retail activities are encouraged (p. LU-10). Commercial retail development is encouraged adjacent to the Artesia Boulevard and Pioneer Boulevard corridors to enhance local and regionally serving commercial activity. Well designed, functionally integrated retail development is encouraged at primary intersections (p. LU-10).	CC-3-12
6	The City's General Plan identifies *The International Cultural District* as an important tourist destination and major economic source for the City (pp. CHR-3 – CHR 4). **No analysis within the document regarding the potential economic, traffic, and noise impacts to this important economic feature of the City is discussed in the draft.** This discussion and analysis should be provided within the draft document.	CC-3-13
7	How does the proposed Pioneer parking structure impact businesses within the business district during construction and operation based on the proposed design? **How would construction from the proposed project, including the Pioneer parking structure, impact the existing businesses located on Pioneer Boulevard?**	CC-3-14
8	TPSS Sites: The draft document states "Although Metro transportation projects are not required to adhere to local land use regulations, Metro would comply with local policies and regulations regarding such improvements" (p. 4-20). Based on this language, **the proposed TPSS sites at Gridley and 183rd, Pioneer Station, and the tail tracks at the terminus (optional) should be consistent with the City's design guidelines and zoning standards.** How would the proposed TPSS sites comply with such regulations to ensure no visual, noise, or health and safety impacts?	CC-3-15
9	According to the draft document, improvements proposed outside of the rail and public rights of way would adhere to the local jurisdiction's zoning ordinance. The City requests any development that is outside the public rights of way, such as the proposed parking structure, be designed consistent with the following City policy documents: 1. City of Artesia Municipal Code 2. Downtown Design Guidelines 3. Community Design Guidelines **The WSAB DEIS/DEIR should show how such structures comply with the City's Municipal Code and Design Guidelines.** For example, parking structures within the Commercial General zone are required to comply with Article 11 – Off Street Parking and Loading; however, the document does not explain how the proposed Pioneer parking structure would meet these requirements.	CC-3-16

Comment No.	General Comments	
10	Property Acquisitions: Parcels located directly adjacent to the north of the proposed Pioneer station should also be acquired for inclusion into the proposed development. **This area should be used as plaza/pedestrian area and open space to further the City's General Plan policies and provide a clear visual and pedestrian linkage to downtown Artesia.**	CC-3-17
11	Station plan Sheet 99 of 101 for the proposed Pioneer Station (Appendix B, Part 5) should note compliance with City of Artesia engineering and development standards for drive aisles, curb cuts, right of way dimensions, etc.	CC-3-18
12	Right of way plan Sheet 128 of 138 (Appendix B, Part 3) shows the existing right of way line bisecting an existing residence north of the proposed track alignment. This should be confirmed for accuracy.	CC-3-19
13	Right of way plan sheet 128 of 138 (Appendix B, Part 3) shows a "Future Bike Trail" north of the proposed track within the right of way. **The bike trail is already constructed, and proposed plans should be updated to reflect the existing improvement.** Further, the bike trail exists beginning at the 183rd and Gridley intersection to 187th Street and should be shown on all applicable plan sheets.	CC-3-20
14	Potential impacts associated with signage from the proposed project is not discussed at length within the document. **Please include signage information pertaining to the proposed alignments, stations, TPSS, parking structures, etc., and how that would comply with the City's Sign Ordinance (Title 9, Chapter 2, Article 12).** Address whether any signage would have visual/aesthetic impacts and/or light and glare impacts from illumination.	CC-3-21
15	Section 9-2.1401(d)(3) of Title 9, Chapter 2 of the City's Municipal Code governs temporary fencing within the City. Construction mitigation measure VA-4 Construction Screening entails temporary screening of construction areas. Would the project comply with City requirements? If so, please clarify and **detail how the temporary fencing for construction would comply with the City's Municipal Code in the environmental document.**	CC-3-22
16	The draft document discusses in multiple sections that adherence to local zoning ordinances/jurisdictional requirements will occur; however, there is conflicting project details that contradict certain City of Artesia regulations (e.g., construction noise). How will project implementation occur in the event Metro's forthcoming designs of project elements, such as the parking structures, conflict with local jurisdictional requirements?	CC-3-23
17	The following permits would be required through the City of Artesia for the proposed project: i. **Variance:** Building Height in the Light Manufacturing and Industrial (M-1) Zone is limited to 35 feet (Title 9, Chapter 2, Article 34, Section 9-2.3403(d)). ii. **Conditional Use Permit:** Proposed parking structures in the General Commercial (C-G) Zone (Title 9, Chapter 2, Article 32, Section 9-2.3203) and the Light Manufacturing and Industrial (M-1) Zone (Title 9, Chapter 2, Article 34, Section 9-2.3402).	CC-3-24

Comment No.	General Comments	
	iii. **Design Review Approval:** Any building or structure requiring a building permit, or the modification of the exterior design or color of an existing structure or element thereof, including architectural accents, that is located on a site in any zone other than the Single Family Residential (R-1) Zone or the Agricultural (A-1) Zone. iv. **Encroachment Permit:** An Encroachment Permit is required for any proposed work to be undertaken in the public right of way. This includes utility work, changes to driveways and roadways, changes to the parkway or the movement of large vehicles through the City. v. **Highway Permit:** Required for the moving of buildings, the making of excavations in public streets, and the laying, constructing, and repairing of curbs and sidewalks. vi. **Street Abandonment:** Permanent closure of streets subject to California Streets and Highways Code, Division 9, Part 3, Chapter 2, Section 8312 vii. **MS4 Stormwater Permit:** Site development data and conditions shall comply with the City's MS4 Stormwater Permit.	CC-3-24
18	The City of Artesia requests collaboration and the ability to work with Metro on the design of Pioneer Station and the Pioneer Station Parking Structure, so that both are consistent with City policy documents, such as the City's Zoning Ordinance, General Plan, and Design Guidelines.	CC-3-25

Comment No.	Section	Reference Text	Comment	
2 – Alternatives Considered/Project Description				
19	Section 2.1 – Introduction and 6.6 – Locally Preferred Alternative Potential Implementation Strategy	An environmental reevaluation could be required depending on the phasing selected.	**The City of Artesia requests that Alignment 1, Design Option 2 be selected as the LPA and it be appropriately evaluated for compliance with CEQA/NEPA.** An environmental reevaluation for the LPA is strongly supported and recommended as opposed to the limits of this environmental document.	CC-3-26
20	Sections 2 and 4	Figure 2-19 – Pioneer Station and Figure 4.3-17 – Property Acquisitions for the Build Alternatives	These figures contain discrepancies on the area of the proposed parking area/structure. If the area shown in Figure 4.3-17 as **not** for full acquisition, there should be acknowledgement that the proposed parking area would expand to the adjacent eastern parcel.	CC-3-27

Comment No.	Section	Reference Text	Comment	
21	Section 2.5.2.2 – Alternative 1, *Stations and Park and Ride Facilities: Pioneer Station*	--	This description/discussion of the Pioneer Station does not include language of the proposed street closures that are a direct result of the proposed design. This section should include reference to the closure of 188th and 187th Streets. As commented on Item 3 above, **the City does NOT support the closure of 187th Street.**	CC-3-28
3 - Transportation				
22	Section 3.4.3.2 – Alternative 1…(including Figure 3-9)	"The bicycle and pedestrian system under Alternative 1 would generally be the same as with the No Build Alternative."	The project would result in closure of 187th and 188th Streets, both of which are currently improved with sidewalks for pedestrians. However, no discussion or mention about the removal of the 188th Street pedestrian circulation is provided in the draft document, which should be included as the proposed Pioneer parking garage would result in the closure of 188th Street. **The change to local street circulation would significantly reduce pedestrian and bicycle access through the area immediately around the proposed station, which is counterproductive to mass transit.** Additionally, there are impacts to the bike trail system within the cities of Paramount and Bellflower, requiring a mitigation measure (MM LU-1) that is not enforceable as it is dependent on each independent jurisdiction's legislative body to approve (amendments to city policy documents).	CC-3-29
23	**Appendix D – Transportation Impact Report**	Page 1-3, second paragraph.	Document describes that the level-of-service (LOS) methodology is based on the 2010 Highway Capacity Manual; this is not the most current edition. In accordance with standard industry practice, LOS analysis should be performed using the current version, HCM 6th Edition (2016).	CC-3-30
24	**Appendix D – Transportation Impact Report**	Page 4-23 to 4-25.	This part of Table 4.5 summarizes the existing LOS operations for intersections in the City of Artesia. It is noted that the nine study intersections in the City of Artesia are shown to be currently operating at LOS B or better during the peak hours. It is	CC-3-31

Comment No.	Section	Reference Text	Comment	
			recommended that these LOS results be cross-checked with City data or available traffic studies for other projects (i.e., Artesia Live I and II projects). **A complete traffic circulation analysis should be performed to include the City's Downtown Area with the Shopping Centers south of the South Street commercial area.**	CC-3-31
	Appendix D – Transportation Impact Report	--	The TIA Report does not include operational analysis of the following intersections: A. Alburtis Avenue/South Street B. Corby Avenue/South Street, or C. The two parking structure access points. With the proposed closure of 187th Street between Corby Avenue (West) and Corby Avenue (East), the intersection of Alburtis Avenue/South Street is likely to experience an increase in traffic volume associated with the re-directed through traffic from 187th Street. **The TIA Report should include analysis of the currently unsignalized Corby Avenue/South Street intersection to determine if the existing traffic control/lane configuration can adequately accommodate additional traffic that will access the proposed parking structure via Corby Avenue.**	CC-3-32
			The proposed parking structure access at Pioneer Boulevard appears to be unsignalized and located approximately 300 feet north of the intersection of Pioneer Boulevard/South Street. Based on the P&R and K&R volumes shown in Tables A5.2 and A5.3, the northbound left turn volume from Pioneer Boulevard into the parking structure appears to be equal approximately 478 trips during the AM peak hour. **Due to the short distance from the intersection of Pioneer Boulevard/South Street and high northbound left turn volume, adverse effects from queuing and congestion impacts could be severe and the TIA Report should**	CC-3-33

Comment No.	Section	Reference Text	Comment	
			include an operational analysis of the Pioneer Boulevard/Parking Structure Access intersection. The potential tail tracks crossing Pioneer Boulevard may cause significant traffic impacts, especially in conjunction with increased traffic resulting from the new station and changed traffic circulation due to the parking structure. These impacts must be adequately analyzed, for both northbound and southbound traffic.	CC-3-33
26	**Appendix D – Transportation Impact Report**	--	No traditional project trip generation table or trip distribution data is provided for vehicles accessing the Pioneer Station parking structure. It is not possible to check volume calculations or underlying assumptions for reasonableness without this information. **In accordance with standard industry practice, the TIA Report documentation should include a trip generation table or summary and trip distribution data for each Station.** Based on the intersection volumes/LOS summary in Attachment A of the TIA Report, approximately 718 vehicle trips (sum of P&R and K&R trips) appear to be traveling inbound to the parking structure during the AM peak hour (80 trips from Corby Avenue via 187th Street, 160 trips from southbound Pioneer Boulevard, and 478 from northbound Pioneer Boulevard). This does not include additional trips potentially entering from northbound Corby Avenue via eastbound South Street.	CC-3-34
27	**Appendix D – Transportation Impact Report**	--	The TIA Report does not include intersection turning movement counts or LOS calculation worksheets typically included in the appendices for documentation. Without such documentation, it is not possible to verify the baseline assumptions for the analysis.	CC-3-35
28	**Appendix D – Transportation Impact Report**	Page 4-76	Appendix D notes that parking observations around the proposed Pioneer Station were conducted between 11:00 AM and 1:30 PM on a Tuesday in September 2017, with an observed on-street	CC-3-36

Comment No.	Section	Reference Text	Comment	
			parking of approximately 20 percent. The observed time period may not reflect peak on-street parking demand, especially on residential streets which is more likely to occur before 8:00 AM or after 5:00 PM on weekdays. **The TIA Report should include additional time periods for the parking analysis to ensure the cumulative peak of both the proposed Pioneer Station and the existing on-street parking demand are adequately accounted for.**	CC-3-36
29	**Appendix D – Transportation Impact Report**	Page 5-69	Appendix D identifies a projected parking demand of 1,450 parking stalls at the Pioneer Station for Alternative 1. This would exceed the parking structure supply of 1,100 parking stalls by 350; however, the TIA Report does not consider this to be an adverse effect by taking credit for 630 unused on-street parking stalls. The use of on-street parking to accommodate demand associated with the proposed Station does not accurately reflect the potential parking impacts that will be perceived by the existing residential users when on-street parking is no longer available, especially those most likely to be impacted on along Corby Avenue, Alburtis Avenue, Jersey Avenue, and 188th Street. **The City strongly opposes the use of on-street parking to make up any parking shortfall. The City has the authority to implement a permit parking program, which may be supported by residents if on-street parking impacts are experienced as a result of inadequate provision of off-street parking. The implementation of a permit parking program would resolve local on-street parking congestion but would only serve to push vehicles to other nearby areas. The lack of sufficient parking capacity will remain an issue.**	CC-3-37
30	**Appendix D – Transportation Impact Report**	Page 5-71	Appendix D identifies a projected parking demand of 1,650 parking stalls at the Pioneer Station for Alternative 2. This would exceed the parking structure supply of 1,100 parking stalls by 550; however,	CC-3-38

Comment No.	Section	Reference Text	Comment	
			the TIA Report does not consider this to be an adverse effect by taking credit for 630 unused on street parking stalls. The use of on-street parking to accommodate demand associated with the proposed Station does not accurately reflect the potential parking impacts that will be perceived by the existing residential users when on-street parking is no longer available, especially those most likely to be impacted on along Corby Avenue, Alburtis Avenue, Jersey Avenue, and 188th Street. **As stated in Comment 29, the City strongly opposes the use of on-street parking to make up any parking shortfall.**	CC-3-38
31	**Appendix D – Transportation Impact Report**	Page 5-73	Appendix D identifies projected parking demand of 1,090 parking stalls at the Pioneer Station for Alternative 3, which would not exceed the parking structure supply of 1,100 parking stalls. Although a surplus of 10 parking stalls is projected to occur at the Pioneer Station under Alternative 3, parking spillover effects are likely to occur since Station riders may have difficulty finding a parking stall as the parking structure approaches 99 percent capacity. **As stated in Comment 29, the City strongly opposes the use of on-street parking to make up any parking shortfall.**	CC-3-39
32	**Appendix D – Transportation Impact Report**	Page 8-32 to 8-33	Mitigation Measures TRA-21 (Parking Monitoring and Community Outreach) and TRA-22 (Loss of Parking) conclude that "adverse effects would be reduced with implementation of this measure; however, adverse effects are likely to remain." This statement appears to conflict with the spillover parking impacts assessment for Alternative 1 (page 5-69) and Alternative 2 (page 5-72) that state "parking effects are unlikely at the stations north of Firestone Stations, as well as… the Pioneer Stations."	CC-3-40

Comment No.	Section	Reference Text	Comment	
		4.1 – Land Use		
33	4.1.3.2 – Alternative 1: LAUS to Pioneer Station, Land Use Compatibility, *Alignment*:	"Furthermore, the proposed aerial alignment would not result in land use incompatibility with urban and suburban areas along the alignment. Overall, the alignment would not conflict with or impede the use of the surrounding land uses, change the function of the public street and rail ROWs as transportation corridors, impede or change the function of the freight tracks and freight sidings that are used by nearby industrial uses, create new land use incompatibilities in the Affected Area for land use, or physically divide an established community."	**Additional detail is requested on how the proposed aerial alignment within the City of Artesia would not result in land use incompatibility with the adjacent residential uses. There would be potential noise and transportation impacts which could result in severe incompatibility with these sensitive uses. As stated in Comment 3, the City of Artesia does not support the closing of 187th Street under any Alternative proposed. 187th Street is the main east-west connecting street at the City's South City Limit boundary. This corridor connects residents and visitors both in vehicles and as pedestrians to the City's commercial shopping centers located south of South Street. The closure of 187th Street will economically and physically divide the City in half with the WSAB project. Closure of two streets that provide east/west access to downtown Artesia inherently disrupt permanent access for the residents who utilize those streets. City staff does not support the permanent closure of 187th Street.**	CC-3-41
34	4.1.3.2 – Alternative 1: LAUS to Pioneer Station, Land Use Compatibility, *Parking*:	"The proposed stations are anticipated to become important junctions for residents, employees, and visitors from neighboring communities and the region promoting existing and planned future development"	The draft document states that the stations would become important junctions from neighboring communities and for the region, implying an increase in travel to the station via various modes of transit. The City is concerned with how this would impact circulation on Pioneer Boulevard from State Route 91 to the proposed station, and South Street from the 605 freeway. **A detailed traffic circulation and pedestrian linkage analysis should be performed and any impacts requiring mitigation should be identified in the Mitigation Measure Report Program (MMRP).**	CC-3-42
35	4.1.3.2 – Alternative 1: LAUS to Pioneer	"…with the exception of the Pioneer Station parking facility, which is currently developed with multifamily residential, industrial, and commercial	The City is concerned regarding the exception of the proposed Pioneer Station parking facility and the claim of general compatibility of parking facilities with surrounding uses. As stated	CC-3-43

Comment No.	Section	Reference Text	Comment	
	Station, Land Use Compatibility, *Parking:*	uses. Nonetheless, the parking facilities would be generally compatible with the surrounding land uses."	in previous comments, Alternatives 1, 2, and 3, provide for a parking demand that is 99% or higher, with Alternatives 1 and 2 resulting in inadequate parking. This will have adverse impacts to the surrounding existing residential development to the proposed parking facility area. Mitigation measures should be listed as state in Item 34 above.	CC-3-43
36	4.1.3.2 – Alternative 1: LAUS to Pioneer Station, Land Use Compatibility, *Parking*:	"The proposed station entrances are not expected to introduce physical barriers or change or impair the function of the surrounding uses; and access to the surrounding community would remain available. The proposed stations would be designed and integrated with the surrounding uses and be compatible with the surrounding land uses."	The Pioneer Station would result in the closure of 188th Street and the at grade track would result in the closure of 187th Street. **As stated in Item 3 above, closure of 187th Street is not acceptable with reasons indicated.** This would impair certain residents the ability to access Pioneer Boulevard without having to proceed in the opposite direction first via Jersey Avenue to 186th Street or to the South Street and Alburtis intersection.	CC-3-44
37	4.1.3.2 – Alternative 1: LAUS to Pioneer Station, Land Use Compatibility, *Street Closures*:	"In addition, 188th Street between Corby Avenue and Pioneer Boulevard and 187th Street and Corby Avenue in Artesia would be permanently closed to build a parking structure, accommodate traffic flow, and reduce cut-through traffic. Access to the surrounding uses would be maintained by re-routing traffic to adjacent streets, and permanent access disruptions to existing land uses on either side of the alignment would not occur. The proposed street closures would not conflict with the surrounding land uses and would not physically divide an established community since the surrounding land uses would remain accessible."	**Closure of two streets that provide east/west access to downtown Artesia inherently disrupt permanent access for the residents who utilize those streets. City staff does not support the permanent closure of 187th Street.**	CC-3-45

Comment No.	Section	Reference Text	Comment	
38	4.1.3.2 – Alternative 1: LAUS to Pioneer Station, Land Use Compatibility, *Stations*	"The proposed stations would be designed and integrated with the surrounding uses and be compatible with the surrounding land uses."	Please explain how the proposed structure is designed to be integrated with the surrounding uses. Does the Pioneer Station comply with the City's Design Guidelines? It is not clear in the draft document. See Item No. 36 and 37 above.	CC-3-46
39	4.1.3.2 – Alternative 1: LAUS to Pioneer Station, Land Use Compatibility, *Barriers*:	"Barriers introduced along the proposed alignment would follow the Metro Rail Design Criteria (MRDC) guidance or equivalent criteria."	Proposed barriers should be consistent with City requirements, as outlined in the City's Design Guidelines. Metro should include language that states they will work with jurisdictions to ensure the proposed barriers are consistent with local design guidelines.	CC-3-47
40	4.1. Land Use	"Similar to Alternatives 1, 2 and 3, Alternative 4 would be consistent with the same applicable goals, objectives, and policies related to alternative transportation, public transportation, and future growth in transit identified in the general plans, specific plans, master plans, and bicycle master plans for the Cities of South Gate, Downey, Paramount, Bellflower, Cerritos, and Artesia."	**There is no analysis of consistency with any approved specific plans within the City of Artesia.** This section outlines the local plan reviewed for consistency and only notes consistency with the city's general plan. Yet as noted in comment above, text states consistency against Specific Plans was reviewed. The city has the Artesia Live Specific Plan and Pioneer Specific Plan, both of which are located on Pioneer Boulevard and within the Study Area of the proposed project. The Pioneer Specific Plan is located within .5 miles of the proposed Pioneer Station and within the Surrounding Area of the alignments. The Artesia Live II Project Specific Plan is less than ½ miles of the Intersection of 183rd Street and Gridley intersection. The South Street Specific Plan would also be impacted by the station and parking structure as it is located within 450 feet of the future parking structure.	CC-3-48
41	Section 4 – Affected Environment and Environmental Consequences	*"City of Artesia General Plan 2030* (City of Artesia 2010). • *Alternative modes of Transportation:* City of Artesia General Plan Circulation and Mobility Sub-Element Policy Action CIR4.2.4 and Community Goal CIR5; Air Quality and Climate Change Sub-Element Policy Action AQ2.1.1; and Sustainability Element Community Goal SUS5 • *Increased mobility, transit access, and transit services: City of Artesia General Plan Circulation and Mobility Sub-Element*		

Comment No.	Section	Reference Text	Comment	
		Policy CIR5.1 and Community Policy CIR6.2, *Air Quality and Climate ChangeSub-Element* Policy Action AQ2.1.6, *Sustainability Element* Community Policy Action SUS5.1.7 • *Policies for compact and denser development, including TODs*: *City of Artesia General Plan Air Quality and Climate Change Sub-Element* Policy Action AQ2.2.3"		CC-3-48
42	Appendix E – Land Use Impact Report	"The parking facility and its associated street closure would not conflict with the surrounding land uses, physically divide an established community, or adversely affect the viability of the existing land uses or create adverse effects to sensitive uses. Therefore, no adverse effects regarding land use compatibility would occur."	The proposed parking structure is stated to be four stories and contain up to 1,100 parking spaces. According to the Transportation Impact Analysis and Parking Study for the WSAB DEIS/DEIR, parking demand for the structure would exceed 1,100 spaces for Alternatives 1 and 2 and be at 99% capacity under Alternative 3. **This could result in vehicles circulating on the adjacent roadways, impacting the existing residential land uses and causing adverse air quality and noise impacts to those sensitive uses.**	CC-3-49
4.2 – Communities and Neighborhoods				
43	4.2.3.2 - Access and Mobility	"188th Street between Corby Avenue and Pioneer Boulevard and 187th Street and Corby Avenue in Artesia would be permanently closed to build a parking structure, accommodate traffic flow, and reduce cut-through traffic. Access to the surrounding uses would be maintained by re-routing traffic to adjacent streets, and permanent access disruptions to existing land uses on either side of the alignment would not occur. The proposed street closures would not conflict with	**As referenced in Item 3 above, Closure of 187th Street is not acceptable to the City.** Closure of 187th street would impact the planned future trail connection to the newly constructed portion of the existing pedestrian trail on 187th Street. Mitigation measures should be listed in the MMRP. Therefore, the DEIR is inadequate in this regard.	CC-3-50

Comment No.	Section	Reference Text	Comment	
		the surrounding land uses and would not physically divide an established community since the surrounding land uses would remain accessible."		CC-3-50
44	4.2.3.2 – At-Grade Grade Crossings	"Existing pedestrian crossings would remain available at intersections with grade crossings."	Would this be the same for the 187th Street crossing that intends to close the street? Would pedestrian crossing remain even though vehicle access would be eliminated?	CC-3-51
45	4.2 Communities and Neighborhoods	"The best available data to determine residential stability is the U.S. Census Bureau 2015 ACS data for 'Residents in Same House After 1 Year.'"	Substantiate this claim. Show justification. There is no pedestrian linkage analysis and study performed.	CC-3-52
46	4.2 Communities and Neighborhoods	--	There is no discussion with how the Property acquisition to accommodate proposed parking facility at Pioneer Station would be consistent with the City's General Plan. **The DEIR should state the criteria for addressing housing relocation assistance and compensation.**	CC-3-53
4.3 - Acquisitions and Displacements				
47	4.3.3.2 – Alternative 1, Replacement and Relocation, *Residential Replacements:*	"This analysis does not account for residents currently living in rent-controlled units and relocation to market-rate units."	Does the proposed project impact rent controlled units? This section should state whether there are or are not impacted rent-controlled units for clarification purposes.	CC-3-54
4.4 - Visual and Aesthetics				
48	Section 4.4 – Visual and Aesthetics	--	Incorporate the following into Section 4.4 of the WSAB DEIS/DEIR document as it pertains to proposed development from the project within the City of Artesia: "For future non-residential development located in or immediately adjacent to residentially zoned properties, construction documents shall include language that requires all construction contractors to	CC-3-55

Comment No.	Section	Reference Text	Comment	
			strictly control the staging of construction equipment and the cleanliness of construction equipment stored or driven beyond the limits of the construction work area. Construction equipment shall be parked and staged within the project site. Staging areas shall be screened from view from residential properties. Construction worker parking may be located off-site with approval of the City; however, on-street parking of construction worker vehicles on residential streets shall be prohibited. Vehicles shall be kept clean and free of mud and dust before leaving the development site. Surrounding streets shall be swept daily and maintained free of dirt and debris."	CC-3-55
49	**Appendix I – Visual and Aesthetic Impact Report**	**"VA PM-6 Local Zoning Ordinances.** Project elements that are located on properties outside of the rail ROW and public rights-of-way would adhere to local zoning ordinances."	This project measure is located within the document section related to visual and aesthetic impacts but is framed more generally. Would this apply to all aspects of the proposed project or only aesthetics and visual impacts?	CC-3-56
50	Section 4.4 – Visual and Aesthetics	--	**The proposed aerial alignment within Artesia would adversely impact the sensitive receptors directly adjacent that portion of the line by degrading their existing visual character.** The project measures to comply with local jurisdictional zoning ordinances and inclusion of landscaping should be further explained as to how those would reduce impacts to the adjacent sensitive receptors within the City of Artesia. **The City supports below grade line entrance to the City with the Station at grade.**	CC-3-57
4.5 – Air Quality				
51	**Appendix J – Air Quality Impact Report**	Page 1-8, first paragraph, "Changes to regional transportation patterns resulting from Project implementation are quantified for informational disclosure using VMT produced by the regional transportation model."	Please provide a citation/reference for the transportation analysis.	CC-3-58

Comment No.	Section	Reference Text	Comment	
52	**Appendix J – Air Quality Impact Report**	Page 5-1, the paragraph above Table 5.1	The discussion regarding VMT needs to cite the traffic analysis as the source for the VMT-based data.	CC-3-58
53	**Appendix J – Air Quality Impact Report**	Page 5-6, top paragraph, "The members of the TCWG concurred that the Project would not be a Project of Air Quality Concern, thereby establishing that PM emissions from diesel trucks would not present localized air quality concerns along roadways affected by the Project."	A screenshot of that decision should be provided as proof of concurrence in the appendices.	CC-3-59
54	**Appendix J – Air Quality Impact Report**	Page 7-1, Table 7.1 General Construction Activity Schedule.	The data provided in Table 7.1 General Construction Activity Schedule is inconsistent with the references provided. The information provided in this table does not completely match the information in Table 4.1 of the Final Construction Methods Report (2021). As the reports should be consistent, please provide an explanation as to why certain construction activities were omitted or combined with other activities.	CC-3-60
55	**Appendix J – Air Quality Impact Report**	Page 7-3, Section 7.2.1 Regional Emissions Analysis, "CalEEMod was used to prepare reasonably conservative estimates of maximum daily regional emissions that would be generated by the sources involved in construction activities described in the West Santa Ana Branch Transit Corridor Project Construction Methods Report (Metro 2020g)."	The reference appears to be outdated. Was the latest version of the Final Construction Methods Report (June 2021) used as the basis of the emissions calculations?	CC-3-61
56	**Appendix J – Air Quality Impact Report**	Page 7-3, Table 7.2 Examples of the Maximum Daily Construction Activity Parameters – Regional Analysis.	The values given in Table 7.2 do not reflect the values given in Appendix A, Construction Emissions Light Rail Corridor Construction Maximum Daily Activity Emissions in the Trips and VMT table on page 187/240 of the report PDF. For example, the worker trips are listed as 300 for each construction activity in the CalEEMod output	CC-3-62

Comment No.	Section	Reference Text	Comment	
			in Appendix A, whereas the worker trips in Table 7.2 vary by activity from 100 to 200. Please explain the discrepancies.	CC-3-62
57	**Appendix J – Air Quality Impact Report**	Page 7-6, first paragraph below the heading 7.3 Construction Impacts.	There is a typographical error. Please change SCAMD to SCAQMD.	CC-3-63
58	**Appendix J – Air Quality Impact Report**	Pages 7-7 to 7-9	For Tables 7.4 through 7.6. It is unclear how the values in these tables were calculated as the CalEEMod output provided for construction emissions only show maximum daily construction activity for the construction activities described in Table 7.2. Please include additional tables, CalEEMod data or an explanation in the appendices to show how the calculations for each Alternative were performed using the CalEEMod output based on the maximum daily construction activity.	CC-3-64
59	**Appendix J – Air Quality Impact Report**	Page 7-7, "Implementation of Mitigation Measure AQ-1 (Vehicle Emissions) would require the use of on-road diesel-fueled haul and vendor delivery trucks to meet the more stringent 2010 CARB on-road emissions standards for PM (0.01 g/bhp-hr) and NOX (0.20 g/bhphr))."	Please add additional text advising the reader to see section 8 for details, so MM AQ-1 can be readily located.	CC-3-65
60	**Appendix J – Air Quality Impact Report**	Page 7-7, 7.3.3.1 Criteria Pollutant and Ozone Precursor Emissions, "Construction of Alternative 2 would employ the same equipment and vehicle fleet as Alternative 1 and the maximum daily construction activity and emissions would be consistent with Alternative 1, as shown in Table 7.4."	Could the additional underground station proposed for Alternative 2 create additional emissions due to additional excavation/hauling activities? If so, construction emissions associated with Alternative 2 should have their own table.	CC-3-66
61	**Appendix J – Air Quality Impact Report**	Pages 7-8 and 7-9, analysis of Alternatives 3 and 4.	When stating that these Alternative will result in "less excavation, a reduction of maximum daily haul truck loads from…" is this in	CC-3-67

Comment No.	Section	Reference Text	Comment	
			comparison to Alternatives 1 and 2? If so, please add text to clarify that fact.	CC-3-67
62	**Appendix J – Air Quality Impact Report**	Page 7-10 under 7.3.7 Maintenance Storage Facility	In the Final Construction Methods Report (June 2021), in the Construction Methods/Affected Environment section it states on page 4-1 that "It is anticipated that construction activities would occur simultaneously along the project alignment." If the MSF is constructed at the same time as the alignment, those emissions should be added together to show the grand total for each alternative analyzed.	CC-3-68
63	**Appendix J – Air Quality Impact Report**	Page 7-12, Table 7.8 Maximum Daily Regional Emissions – Build Alternatives	Please provide supporting documentation in the appendices showing what assumptions were used as the basis for the calculations. In comparison to the Final GHG Impact Report and the Final Energy Impact Report, the Appendices for the Final Air Quality Impact Report are remarkably small and may be missing some data. Please clarify whether any calculation data is missing and include any additional data as needed.	CC-3-69
64	**Appendix J – Air Quality Impact Report** **Appendix K – Greenhouse Gas Emissions Impact Report**	--	Global comment for Air Quality and Greenhouse Gas Impact Reports: The CalEEMod runs for the project were performed in January and February of 2020 using CalEEMod version 2016.3.2; however, the report is dated June 2021 and CalEEMod released their newest version of the model, version 2020.4.0, in June 2021. **Therefore, any revisions to the GHG and/or AQ impact analyses should be performed using the latest version of CalEEMod.**	CC-3-70
65	**Appendix J – Air Quality Impact Report**	--	**WSAB DEIS/EIR: The WSAB DEIS/EIR Air Quality Section must be redone as needed per comments on the Air Quality Impact Report.**	CC-3-71

Comment No.	Section	Reference Text	Comment	
4.6 – Greenhouse Gas Emissions				
66	**Appendix K – Greenhouse Gas Emissions Impact Report**	Page 7-2, Table 7.1 General Construction Activity Schedule.	Table 7-1 does not include demolition activities detailed in Table 4.1 of the Final Construction Methods Report (2021); however, demolition was included in the analysis provided in the CalEEMod output in the Appendix. Update Table 7-2 to reflect more accurately what was analyzed.	CC-3-72
67	**Appendix K – Greenhouse Gas Emissions Impact Report**	Page 7-3 Table 7.2 Build Alternatives Export and Import Quantities.	The amounts listed in Table 7.2 do not match the amounts listed in Table 7.3 Export and Import Quantities – Build Alternatives in the Final Air Quality Impact Analysis Report (June 2021). Please confirm which is correct and which data were used in the analyses. The analyses should be consistent across the air quality and GHG reports and use the same data as the basis for the construction analyses.	CC-3-73
68	**Appendix K – Greenhouse Gas Emissions Impact Report**	--	Global comment for Air Quality and Greenhouse Gas Impact Reports: The CalEEMod runs for the project were performed in January and February of 2020 using CalEEMod version 2016.3.2; however, the report is dated June 2021 and CalEEMod released their newest version of the model, version 2020.4.0, in June 2021. Therefore, any revisions to the GHG and/or AQ impact analyses should be performed using the latest version of CalEEMod.	CC-3-74
69	Section 4.6 – Greenhouse Gas Emissions	--	**WSAB DEIS/EIR: Update the WSAB DEIS/EIR Greenhouse Gas Section as needed per comments on the Greenhouse Gas Emissions Impact Report.**	CC-3-75
4.7 – Noise and Vibration				
70	**Appendix M – Noise and Vibration Impact Report**	Page 1-20, Section 1.5.5.2	An assumption was made that groundborne vibration propagation measurements from completely different locations could be applied to the project site. This methodology is questionable given how much soil type affects groundborne vibration propagation. **Vibration measurements should be considered in conjunction**	CC-3-76

Comment No.	Section	Reference Text	Comment	
			with site-specific geotechnical reports that provide information related to the soil composition at each site.	CC-3-76
71	**Appendix M – Noise and Vibration Impact Report**	Page 1-14, "Emergency, standby and critical operations power system generators, located along the alignment, at maintenance facilities, and at a rail operations control center would be another potential source of noise. Reduction of noise from these sources will be provided by barriers, enclosure, sound absorptive materials, and engine silencers as applicable to the individual facility or unit design."	The text is used to justify no further noise analysis for generators. These noise mitigating features should be included as mitigation measures.	CC-3-77
72	**Appendix M – Noise and Vibration Impact Report**	Table 1.1 LRT on page 1-10	Include the units on Table 1.1 LRT on page 1-10, Operating Schedule for Train Length.	CC-3-78
73	**Appendix M – Noise and Vibration Impact Report**	Page 1-5 - Public Address System, "These systems will have automatic volume adjustment controls that are designed so the announcements are only a few decibels above ambient noise levels."	This should be included as a mitigation measure. Further, as stated on page 1-4 of the Noise and Vibration Impact Report, studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately 3 dBA. Therefore, the PA system will likely need to be at least 3 dB louder than the ambient noise environment.	CC-3-79
74	**Appendix M – Noise and Vibration Impact Report**	--	Compared to other available models, i.e., SoundPLAN and Cadna, the FTA noise modeling methodology is more of a screening analysis. For example, in the FTA analysis, a penalty of 5 dB is applied to the noise level at a receiver when a noise source is elevated. The elevation of the noise source and the receiver is not considered. This screening level of analysis also applies to intervening barriers, locations of receptors, and topography and ground absorption. The more sophisticated models that are capable of modeling rail noise use a digital ground model based on actual	CC-3-80

Comment No.	Section	Reference Text	Comment	
			topography on which existing and proposed buildings, barriers, and noise sources are modeled. **In order to meet the typical level of analysis required in most CEQA documents a detailed noise impact analysis must be conducted using a model that can more accurately consider these specifics to make sure proposed mitigation will be effective before spending taxpayer money.** This detailed analysis should at least be done for areas where the rail is elevated such as the proposed 183rd and Gridley interchange structure. If the analysis cannot be done in a timely manner, it should be included in the Noise and Vibration Impact Report as mitigation to be conducted during the design/build phase.	CC-3-80
75	**Appendix M – Noise and Vibration Impact Report**	--	The Noise and Vibration Impact Report states that nighttime construction may occur and that it should also be clarified that construction noise is only exempt from noise ordinances where it is officially exempted in the ordinance. There is not enough evidence to prove the effectiveness of provided construction noise mitigation. For example, the City of Los Angeles has a 75 dBA Lmax noise standard for construction which is difficult to meet during regular building construction. The Noise and Vibration Impact Report defers this impact analysis and mitigation. Mitigation provided to meet the much less strict FTA thresholds will likely not work to meet City standards that apply. The Artesia Municipal Code Title 5, Chapter 2, Section 5-2.03 quantifies a nighttime exterior noise standard of 50dB(A), and Title 5, Chapter 2, Section 5-2.04 quantifies a nighttime interior noise standard of 45dB(A). **The Artesia Municipal Code Title 5, Chapter 2, Section 5-2.07 Exemptions does NOT exempt construction noise from the City's noise standards.**	CC-3-81

Comment No.	Section	Reference Text	Comment	
			FTA Construction noise standards at residential land uses are 90 dBA Leq during daytime hours and 80 dBA Leq during nighttime hours. There are affected residences that will be exposed to very high noise levels that are not usually allowed by many local jurisdictions.	CC-3-81
76	**Appendix M – Noise and Vibration Impact Report**	"The regulations of local jurisdictions do not apply transit noise, which is most appropriately assessed using guidance provided by the FTA. However, the regulations of local jurisdictions are relevant with regard to Project construction."	Please provide the source of the quoted information. The Noise and Vibration Impact Report was prepared to support a CEQA/NEPA document. Multiple decisionmakers will want to see the impacts in light of CEQA standards. On page 1-8 the Noise and Vibration Impact Report states "To satisfy California Environmental Quality Act (CEQA) requirements, noise and vibration impacts are analyzed in accordance with Appendix G of the CEQA Guidelines….". In fact, the Noise and Vibration Impact Report does not analyze project impacts in light of the Guidelines presented in Appendix G. For example, there is no information in the report that a reviewer could use to address CEQA Guidelines Appendix G Checklist question XIII. a (below). This question is address in terms of FTA thresholds only. CEQA Checklist Question XIII. A) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?* The City of Artesia (and most all other affected cities) have a version of the state's Noise and Land Use Compatibility Matrix. The City of Artesia General Plan Noise Element states that this matrix is the primary tool that allows the City to ensure integrated planning for compatibility between land uses and outdoor noise. The City of Artesia Matrix indicates that exterior noise levels of up to 60 dBA CNEL are considered normally acceptable at residential land uses	CC-3-82 CC-3-83

Comment No.	Section	Reference Text	Comment	
			and noise levels of up to 70 dBA CNEL are considered to be conditionally acceptable at residential land uses. City of Artesia Community Policy N 4.1 reinforces the use of the standards presented in the Noise and Land Use Compatibility Matrix. The Noise and Vibration Impact Report discusses impacts as being light, moderate, or severe in context of existing measured noise levels. **The CEQA impact section should discuss potential impacts in light of the City's Noise and Land Use Compatibility Matrix.** Further, because the FTA analysis methodology differs greatly from what is usually used for CEQA analysis, it is not easy for decisionmakers and the public to understand the impacts in terms of what they are accustomed to. **This shortcoming is carried forward into the EIS/EIR where technical details are supposed to be summarized in a manner that the average person could understand. The analysis and associated mitigation, where applicable, that is necessary to address CEQA Checklist Question XIII. a) needs to be performed and not be put off at a later date. A CEQA finding cannot be made.**	CC-3-83
77	**Appendix M – Noise and Vibration Impact Report**	Page 7-11, "The project would be located in multiple jurisdictions with competing noise standards."	The above discussion in comment no. 76 also applies to any ordinances or General Plan policies that pertain to construction noise. For the purposes of this analysis, the FTA general assessment construction noise limit criteria 1-hour Leq have been applied. Mitigation Measure 7 states that it would comply with local construction ordinances where applicable. The Noise and Vibration Impact Report acknowledge the existence of the local standards but do not evaluate potential construction noise impacts in light of those standards. Also, noise standards do not compete.	CC-3-84

Comment No.	Section	Reference Text	Comment	
78	**Appendix M – Noise and Vibration Impact Report**	Page 7.1, Table 7.1 – City of Artesia	The table states the City of Artesia General Plan does not include a quantitative construction noise standard. **This is NOT true.** Refer to the City's General Plan, Noise Sub Element, Table N-2, which identifies a conditionally acceptable Community Noise Exposure level of 55-70 dB(A). Construction noise is not exempted from the City's municipal code. Short-term increases in ambient noise are limited to those increases as identified in Artesia Municipal Code Title 5, Chapter 2, Section 5-2.03, or a maximum of 20dB(A) for less than 1 minute.	CC-3-85
79	Section 4.7 – Nosie and Vibration	--	Does the WSAB DEIS/DEIR address potential noise impacts from the rapid change in grade at the retained fill guideways with the City of Artesia? **Provide clarification on whether the change in elevation for the proposed LRT at projected speeds would result in wheel noise that could impact sensitive receptors adjacent to the areas of track proposed.**	CC-3-86
4.11 – Water Resources				
80	Section 5.4.1 – Hydrology and Surface Water Bodies	"Modifications to local storm drain systems would be required to discharge runoff from the project site. New drainage pipes under at-grade track would collect stormwater to earthen or concrete drainage swales running parallel to the track. Drainage systems within the portions of elevated track and near tunnel portals would collect and discharge stormwater to the existing local stormwater infrastructure... New or modified storm drainage systems would be designed to meet local and regional standards."	Where would local storm drain systems be required for modification? Modification to local storm drain systems within the City of Artesia would require review and approval by the City's Community Development Department. Document acknowledges local jurisdictions have review authority over local improvements and storm drain modifications. The project, generally, and the parking structure specifically will require Low Impact Development (LID). As such, appropriate LID Infrastructure will be required. The City supports the use of the aforementioned plaza for the construction of LID infrastructure (see comment 10).	CC-3-87

Comment No.	Section	Reference Text	Comment	
81	Appendix T – Water Resources Impact Report	"WR PM-1: The project will acquire and comply with all relevant permits identified in Section 2."	Clarify what Section 2 is referencing as there are no listed permits in Section 2 of Appendix T.	CC-3-88
4.12 – Energy				
82	Section 4.12 - Energy	--	**If revisions are made to the air quality and greenhouse gas analysis CalEEMod modeling, please update the Energy Impact Analysis Report as needed based on the revised data.**	CC-3-89
83	Section 4.12 - Energy	--	**WSAB DEIS/EIR: Please update the WSAB DEIS/EIR Energy Section as needed per comments on the Energy Impact Analysis Report.**	
4.16 – Parklands and Community Facilities				
84	Appendix AA – Parkland and Communities Impact Report	Table 4.2 – Bike Facilities Identified within 0.25 Mile of Build Alternatives	The table does not include the bike trail located within the City of Artesia that is located on the WSAB corridor. **This portion of multiuse path (including bicycles) would be directly impacted as a result of the proposed alignments.** While Section 1.2(c) of the license agreement between Metro and the City stipulates Metro's ability to repossess the area, there is a minimum 180 day written notice to terminate the agreement.	CC-3-90
(Multiple Sections) - Utilities and Service Systems				
85	Section 4.19.2.3 – Utility Relocation and Installation	"Nevertheless, positioning of project elements may require the relocation, modification, or protection in place of utilities. Utility relocation work would generally occur within the affected ROW and on adjacent and nearby streets. Affected utilities would include storm drains, sanitary sewers, power lines, gas pipelines, electrical duct banks, oil pipelines, electrical transmission lines,	The WSAB DEIS/DEIR concludes that impacts to utilities and service systems are considered to be effects determined not to be significant; however, Section 4.19.2.3 states a myriad of utilities would be impacted. Where in the document are the details of these utility impacts explained for the City of Artesia? Additional information regarding utility impacts within Artesia should be included within the utility subsections related to project construction and operations.	CC-3-91

Comment No.	Section	Reference Text	Comment
		lighting, irrigation pipelines, water lines, fiber optic lines, telephone, and cable lines."	

CC-3-91

City of Artesia – CC-3

Comment ID	Response
CC-3-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-3-2	The Final EIS/EIR was updated to include a design option that would keep the 187th Street grade crossing open but close 186th Street. The analysis is included in each topic in Chapters 3 and 4 of the Final EIS/EIR as applicable. Metro met with the City of Artesia since circulation of the Draft EIS/EIR regarding the closure of 187th Street. A meeting also occurred on November 9, 2022, with Metro, the City of Artesia, and the California Public Utilities Commission (CPUC). As explained in the meeting with CPUC, given the proximity of 186th and 187th Streets, one of the streets will need to be closed to accommodate the Project. As discussed during the meeting, the request from CPUC is consistent with other light rail transit (LRT) projects in Metro's system, in which CPUC requests that Metro evaluate limiting new at-grade crossings to limit conflicts between pedestrians, rail vehicles, and automobiles. CPUC stated its position that new at-grade crossings should be minimized as much as possible during the development of the alignment. Metro, in coordination with the City, will determine which street will remain open prior to adopting the Project and issuance of the Record of Decision. Based on discussions in February 2024, the City has expressed a preference for the design option, which would close 186th Street and keep 187th Street open. Regarding a below-grade alignment, refer to CR-GEN-3. Additionally, on October 10, 2022, the City of Artesia provided a letter to Metro withdrawing the request that the Final EIS/EIR evaluate a below-grade cut-and-cover alignment at the intersection of Gridley Road and 183rd Street and as an alternative to the closure of 187th Street.

Comment ID	Response
CC-3-3	The Draft EIS/EIR includes a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently considers the environmental consequences of the alternatives evaluated (State California Environmental Quality Act [CEQA] Guidelines, § 15151). As provided by the CEQA Guidelines, the adequacy of an environmental document is determined in terms of what is reasonable and feasible, in light of such factors as the magnitude of the project at issue, the severity of its likely environmental impact, and the geographic scope of the project (State CEQA Guideline, § 15204[a])). For a linear project that spans approximately 6.6 miles (Alternative 4) to approximately 19.3 miles (Alternatives 1 and 2), and traverses through or is directly adjacent to 12 cities and 1 unincorporated community, what is reasonable and feasible is different than what could be reasonably accomplished for smaller projects with relatively simple analyses. The Draft EIS/EIR is based on detailed project planning and design specific to the West Santa Ana Branch Transit Corridor, including in the City of Artesia. The Draft EIS/EIR includes thorough information about the Purpose and Need of the Project, the construction and operational components of each of the Build Alternatives, including design options and the maintenance and storage facility (MSF), applicable regulations regarding the various resource topics addressed, the analytic methodology employed for each topic, the existing environmental setting, the environmental consequences and impacts of the Build Alternatives, and regulatory requirements, including local standards, project commitments, and mitigation measures with which the Project will comply and that will ensure environmental impacts are minimized. The Draft EIS/EIR also includes appropriate graphics, tables, and figures to help convey the technical detail in a manner that is comprehensible for a layperson. To avoid unnecessary repetition, the Draft EIS/EIR's CEQA sections rely on and reference information presented earlier in each section that was originally presented in support of the National Environmental Policy Act (NEPA) analysis. The analyses are also based on the more detailed technical studies, which are referenced at the beginning of each Draft EIS/EIR section and were included as appendices to the Draft EIS/EIR. Contrary to the assertion in the comment, the Draft EIS/EIR explains why and to what degree compliance with applicable regulations and mitigation measures will be effective at reducing and mitigating the identified significant impacts. Although the comment asserts that the Draft EIS/EIR does not adequately address the potential environmental effects of the Project, the comment does not provide an example of any potential environmental impact that the commenter believes has been insufficiently addressed. Nor does the comment provide any information indicating that the environmental effects identified in the Draft EIS/EIR cannot be adequately mitigated as proposed, or any evidence that the Project cannot or would not comply with applicable regulatory standards. As provided in the CEQA Guidelines, comments on a draft EIR should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (State CEQA Guidelines, § 15204[a]). Responses to the specific concerns raised by the comment or any specific information identified as vague or generalized are provided in the responses below.
CC-3-4	The analysis in each section of the environmental document follows state and federal guidelines for each individual topic. Each individual section of the environmental document defines a specific "Affected Area" that is appropriate for the analysis of each particular subject. The Affected Areas are identified in Chapter 4, Table 4.0.1 of the Draft EIS/EIR. Metro does not have guidelines on station location and the one-half-mile radius impact area for environmental analysis.

Comment ID	Response
CC-3-5	CEQA Guidelines section 15088.5(a)(4), cited by the comment, provides that recirculation of a draft EIR is required if the "draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." The Draft EIS/EIR provides a comprehensive analysis of the potential environmental effects of the alternatives and mitigation measures to avoid or minimize those effects. As such, the Draft EIS/EIR will not be recirculated. The Final EIS/EIR will be made available for public review. Refer to response to comment CC-3-3.
CC-3-6	See CR-GEN-1 regarding identification of the LPA and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo. Project-level environmental review in the Final EIS/EIR was updated to reflect refinements made to the LPA in response to comments received on the Draft EIS/EIR and stakeholder coordination completed subsequent to circulation of the Draft EIS/EIR. Per 23 U.S.C. 139, the Final EIS/EIR includes detail on the LPA to support development of mitigation measures and compliance with other environmental laws.
CC-3-7	The Draft EIS/EIR fully considers the potential environmental effects of construction and operation of Build Alternatives, including impacts within the City of Artesia. Additional information regarding the impacts of the Build Alternatives and resource-specific background information, data, and other evidence supporting the analyses is included in the detailed technical reports referenced at the beginning of each resource section of the Draft EIS/EIR and included as appendices to the Draft EIS/EIR. In addition, Appendix B, Final Advanced Conceptual Alignment Design, of the Draft EIS/EIR provides parcel-specific information regarding the Build Alternatives, including the proposed LRT alignments, trackwork, grade crossings, freight realignment, rights-of-way, and stations. Regarding aesthetic impacts, cited in the comment as a topic that the Draft EIS/EIR should consider with respect to impacts within the City of Artesia, the Draft EIS/EIR explains that the City of Artesia is located within the "Suburban Residential Landscape Unit" evaluated in Chapter 4, Section 4.4 of the Draft EIS/EIR. Table 4.4.7 in Section 4.4 of the Draft EIS/EIR summarizes the potential effects to the visual character, visual sensitivity, and visual quality in the Suburban Residential Landscape Unit, including effects related to the Pioneer Station (located within the City of Artesia just west of the City of Cerritos boundary), and the potential effects on this landscape unit caused by the Build Alternatives' parking facilities, LRT tracks, overhead catenary system poles, overhead wires, utility poles, fences and retaining walls, soundwalls, landscape removal, and grade crossings and other modifications. Additionally, Figure 4.4-10 in Section 4.4 of the Draft EIS/EIR depicts the change in visual character and quality at the Pioneer Station. As concluded in the Draft EIS/EIR, the Build Alternatives would not cause a significant aesthetic impact within the Suburban Residential Landscape Unit, including within the City of Artesia. The project components would not detract from the visual character and quality and would not significantly increase light and glare in this area. Further, the Build Alternatives would not conflict with any applicable zoning or other zoning regulations governing scenic quality. Additional information concerning the potential for visual impacts, including impacts within the City of Artesia, is provided in Section 4.4.1.5 of the *West Santa Ana Branch Transit Corridor Project Visual and Aesthetic Impact Analysis Report* (Appendix I of the Draft EIS/EIR), which discusses visual resources near the Pioneer Station. Regarding impacts to water resources, also cited as an example in the comment, Chapter 4, Section 4.11 of the Draft EIS/EIR provides a thorough analysis of the Build Alternatives' potential effects on hydrology and surface water bodies, water quality, floodplains, and groundwater within the Affected Area, including within the City of Artesia. The figures contained in Section 4.11 provide information concerning hydrology and water resources specific to the City of Artesia. The *West Santa Ana Branch Transit Corridor Project Water Resources Impact Analysis Report* (Appendix T of the Draft EIS/EIR) and the *West Santa Ana*

Comment ID	Response
	Branch Transit Corridor Project Hazardous Materials Impact Analysis Report (Appendix S of the Draft EIS/EIR) provide additional specific information on hydrology and water quality-related topics. The Draft EIS/EIR concludes that the Build Alternatives would not cause significant impacts related to water resources, including within the City of Artesia. Regarding construction impacts, also cited as an example in the comment, Chapter 3, Section 3.7 and Chapter 4, Section 4.19 of the Draft EIS/EIR provide an extensive analysis of the potential construction-related impacts of the Build Alternatives, including potential construction-related impacts within the City of Artesia. Additional information on construction means and methods is provided in the Construction Methods Impact Report (Appendix L of the Draft EIS/EIR) and each topic specific technical report. Additionally, traffic and parking impacts are discussed in Chapter 3 the Draft EIS/EIR and in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (previously Appendix D of the Draft EIS/EIR). As noted in Table 5.4 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report,* intersections in the City of Artesia will not experience adverse effects. On-street parking loss due to implementation of the LPA will not result in the on-street parking supply to decrease below demand within the City of Artesia, and adverse impacts were not identified. See response CR-TRA-1 regarding spillover parking impacts. Consistent with the Draft EIS/EIR, the supply of parking in the transit parking structure will accommodate demand at the Pioneer Station. See response to comment CC-3-13 regarding noise impacts. Noise mitigation measures are identified in Section 4.7.4.2 of the Draft EIS/EIR to reduce potentially significant noise and vibration effects that will occur during construction activities and during operations, with updated measures included in Section 4.7.4.2 of the Final EIS/EIR. Refer also to the response to comment CC-3-3.
CC-3-8	See response to comment CC-3-6 regarding identification of the LPA.
CC-3-9	See response to comment CC-3-2. See response CR-GEN-4 regarding Metro's Grade Crossing Safety Policy for Light Rail Transit, which includes consideration of train and vehicle traffic frequency.
CC-3-10	See response to comment CC-3-2.
CC-3-11	The parking structure design was discussed at a January 28, 2020 meeting between Metro and the City. Additionally, Metro sent a letter to the City dated May 12, 2020, with a revised parking structure design in response to the City's comments. The structure was extended closer to the Pioneer Station platform and the ground floor was designed to not preclude future development considerations. Additionally, in response to a June 1, 2022 meeting with the City of Artesia, the design of the parking structure was further refined based on meetings between Metro and the City. These modifications included shifting the driveway on Pioneer Boulevard to align with Solana Place and adding a traffic signal and shifting the structure to the north to provide alley egress. Metro will also coordinate with city staff per an executed Master Cooperative Agreement. The Master Cooperative Agreement provides the City the opportunity to review design packages and provide comments. Because all the parking facilities are Metro properties and considered as Metro right-of-way (ROW), the structure will be governed by Metro Board adopted policy and will be operated by Metro personnel. Metro will coordinate with the City regarding ongoing operating and maintenance feedback.

Comment ID	Response
CC-3-12	According to the City's 2030 General Plan, the parking structure will be located in an area that is designated as South Street Gateway Commercial (Exhibit LU-3: General Plan 2030 Land Use), not Pioneer Boulevard Commercial. According to the City's 2030 General Plan, the South Street Gateway Commercial land use designation "provides for the enhancement of retail and service uses along the South Street corridor. The South Street Gateway Commercial area is envisioned as a commercial node that enhances functional connectivity with the City Center Mixed Use area. Higher intensity, integrated developments area encouraged. Complimentary urban design and streetscape improvements are envisioned to enhance the area's function and a southern gateway to the City." As discussed in Section 5.2.3.1, Table 5.21 "Policy Action AQ 2.2.3" in the *West Santa Ana Branch Transit Corridor Project Final Land Use Impact Analysis Report* (Appendix E of the Draft EIS/EIR) "Land use patterns adjacent to and surrounding the proposed alignment and stations would be guided by the policies of the local government's general plan. The Pioneer Station will be located at the northeastern end of the area that is designated as South Street Gateway Commercial by the City's General Plan Land Use Element. According to the City's General Plan, the South Street Gateway Commercial area would encourage higher intensity, integrated developments. The Pioneer Station would provide opportunities for this area to be developed with higher residential and commercial densities."
CC-3-13	Some businesses may experience some nuisance impacts due to construction activities (e.g., noise, dust), but the impacts are expected to be minimal. Implementation of the Construction Outreach Plan (Mitigation Measure COM-1, described in Chapter 4, Section 4.19.3.2 of the Draft EIS/EIR) will alert visitors to the area that businesses are open during construction. Based on analysis in the *West Santa Ana Branch Transit Corridor Project Transportation Impact Analysis Report* (Appendix D of the Draft EIS/EIR) and Chapter 3, Section 3.4.1 of the Draft EIS/EIR, the LPA will not have adverse traffic impacts after mitigation at intersection in the City of Artesia. See response to comments CC-3-28 and CC-3-29 for additional information regarding traffic operations on intersections along and near Pioneer Boulevard (the International Cultural District). Therefore, there is no evidence of potential impacts to traffic for businesses in the International Cultural District. In regard to noise impacts to the International Cultural District, noise-sensitive uses were identified for the noise analysis within the Draft EIS/EIR in Section 4.7.3 of Chapter 4. Sensitive land uses, such as residences and parks within 350 feet of the LRT alignment, were included in the analysis. The noise analysis considered sensitive uses located within the City of Artesia International Cultural District within the vicinity of Pioneer Boulevard, 186th Street, and 187th Street. The construction noise and vibration analysis was provided in Chapter 4, Section 4.19.3.7 of the Draft EIS/EIR. Draft EIS/EIR Mitigation Measure NOI-8 (Noise Control Plan) requires the preparation of a Noise Control Plan that will be implemented during construction to reduce construction noise impacts to the extent feasible (this measure is referred to as Mitigation Measure NOI-6 in the Final EIS/EIR). Construction noise levels will be temporary disruptions and are not anticipated to reach noise levels that will inhibit use of community facilities and residential properties.

Comment ID	Response
CC-3-14	Construction activities will occur within the area acquired for the Pioneer Station parking structure and will not extend to businesses outside of those limits. Although some businesses may experience some nuisance impacts due to construction activities (e.g., noise, dust), the impacts are expected to be minimal. Implementation of the Construction Outreach Plan (Mitigation Measure COM-1, described in Chapter 4, Section 4.19.3.2 of the Draft EIS/EIR) will notify visitors to the area that businesses are open during construction. 13 businesses will be permanently relocated for the Pioneer Station parking structure. See responses CR-DIS-1 and CR-DIS-2 regarding compliance with the Uniform Act and California Relocation Act and acquisition and displacement data. Access to other businesses in the vicinity of the Pioneer Station parking structure will be maintained during construction and operation. 188th Street between Corby Avenue and Pioneer Boulevard will be permanently closed for the Pioneer Station parking structure, but access to the surrounding businesses will be maintained through surrounding streets (i.e., Pioneer Street, South Street, and Corby Avenue), which are one or two blocks (or less than 500 feet) from the street closure. Additionally, vehicles leaving the Little India Food Court driveway will no longer be able to turn left (south) onto Pioneer Boulevard, but access to businesses will be maintained.

Comment ID	Response
CC-3-15	As evaluated in the Final EIS/EIR, two traction power substations (TPSS) sites will be located in the City of Artesia. The TPSS proposed at Gridley Road/183rd Street will be located within the Metro-owned Pacific Electric Right-of-Way (PEROW) at the southeast corner of the intersection and will be situated south of the Artesia Historic District Recreational Trail and to the rear of commercial properties. The TPSS proposed at the Pioneer Station will be located on the east side of Corby Avenue, immediately south of the PEROW. The property on which the TPSS will be located is zoned Light Manufacturing and Industrial. According to Section 9-2.3403 of the City of Artesia Municipal Code, Light Manufacturing and Industrial zone areas have no minimum front, side, and rear yard setback requirements. Although residences are located across the street from the TPSS site proposed at Pioneer Station, the residential properties are also in the Light Manufacturing and Industrial zone. No residential zones are located to the side or rear of the TPSS site. Although the rear of the TPSS site is zoned commercial, this parcel will be acquired and will be developed with a parking structure as part of the LPA. The TPSS will be set back by more than 10 feet from the rear property line that is zoned commercial. The TPSS will comply with the City's setback and height requirements. Either the existing wall along the westerly perimeter of the TPSS site will be maintained and designed to screen and soften views of the TPSS from adjacent residential properties or landscaping, or if the existing wall is removed, fencing will be installed around the site, which is consistent with the fences and walls requirement in Section 9-2.3403(h) of the City of Artesia Municipal Code. Section 9-2.3403(d) of the City of Artesia Municipal Code limits building heights in the Light Manufacturing and Industrial zone to 35 feet. The height of the proposed TPSS will be well below this height limit. Compliance with the City of Artesia zoning standards will maintain that the TPSS is not out of scale with the surrounding structures. The height, scale, and visual character will be consistent with the surrounding one-story structures. Design of the TPSS and screening of the TPSS site will follow guidance of the Metro Rail Design Criteria (MRDC) or equivalent criteria to minimize adverse effects related to visual, noise, and public safety. In addition, Project Measure VA PM-4 (Landscaping Screening) will be implemented as needed to improve the appearance of the structure. Metro will also coordinate with city staff per an executed Master Cooperative Agreement. The Master Cooperative Agreement provides the City the opportunity to review design packages and provide comments. As part of this process, a list of applicable standards will be obtained from the City. In regard to TPSS noise, the noise analysis in the Draft EIS/EIR evaluated TPSS facilities in Chapter 4, Section 4.7.3.1. Mitigation Measure NOI-6 (TPSS Noise Reduction) identifies several methods to reduce TPSS noise for the TPSS units that will result in noise impacts. Mitigation Measure NOI-6 (TPSS Noise Reduction) is referred to as Mitigation Measure NOI-4 (TPSS Noise Reduction) in the Final EIS/EIR. Potential noise-reduction measures include orienting cooling fans and heating, ventilation, and air conditioning (HVAC) equipment away from sensitive receptors, using quieter cooling fans or HVAC equipment, installing an enclosure around the TPSS unit, installing baffles, or providing sound insulation of the TPSS unit enclosure. Where there are no noise impacts from a TPSS, then providing a noise reduction measure would be a betterment
CC-3-16	See response to comment CC-3-15 regarding compliance with the City of Artesia Municipal Code. Metro will consult applicable city requirements as design of the structure advances. As stated in response to comment CC-3-15, Metro will coordinate with city staff per an executed Master Cooperative Agreement that will provide the City of Artesia with the opportunity to review design packages and provide comments, including whether the project elements in the City of Artesia comply with the City's Municipal Code and Design Guidelines. Additionally, Metro has coordinated, and continues to coordinate, with the City of Artesia as it relates to project design.

Comment ID	Response
CC-3-17	In response to comments on the Draft EIS/EIR and stakeholder coordination, the project design has been refined, with refinements described in Chapter 2 and Appendix E of the Final EIS/EIR. Updated station and right-of-way plans are included in Appendix B of the Final EIS/EIR. In coordination with the City of Artesia, the entrance to the Pioneer Station parking structure has been modified to align with Solana Place and include a traffic signal, and the structure has been shifted north. Refinements will require the permanent full acquisition of 10 parcels for the Pioneer Station parking facility, 1 permanent full acquisition for a TPSS site adjacent to the Pioneer Station, and 1 permanent partial acquisition for a grade crossing. Figure 4.3-14 in Chapter 4, Section 4.3 of the Final EIS/EIR has been updated to identify the following parcels that will be affected by the LPA in the City of Artesia: APNs 7039-012-004, 7039-012-012, 7039-013-016, 7039-013-023, 7039-013-008, 7039-013-007, 7039-013-006, 7039-013-014, 7039-013-013, and 7039-013-005 (for Pioneer Station parking facility), APN 7039-012-013 (for TPSS site), and APN 7039-025-018 (for grade crossing). Metro can only acquire the property needed for project elements. The footprint of the Pioneer Station and parking structure as shown in the Final EIS/EIR is sufficient to accommodate these project elements, including pedestrian circulation. Metro has previously discussed this with the City, including in a letter to the City dated May 12, 2020. Should the City acquire these parcels in the future, the design could be adapted to not preclude connectivity to Pioneer Station.
CC-3-18	A general note is included in Appendix B of this Final EIS/EIR that the design of the Project will comply with applicable State, local, and city code requirements. This includes geometric design such as drive aisles, curb cuts, and right-of-way dimensions. Coordination with the City will continue during future stages of design.
CC-3-19	The right-of-way lines shown on the referenced plan sheet are accurate. The residential structure currently encroaches into the Metro-owned PEROW. However, the LRT tracks and project elements will not extend to the northern edge of the PEROW, as such, the residence will be unaffected by the Project.
CC-3-20	The right-of-way and grade crossing plans in Appendix B of the Final EIS/EIR have been updated to reflect the completion of the Artesia Historic District Recreational Trails. See specifically sheets T-216 through T-218 and T-260 through T-263 in Appendix B of the Final EIS/EIR. The analysis in the Final EIS/EIR reflects this update to the right-of-way and grade crossing plans, which does not affect the conclusions presented in the Draft EIS/EIR. No new impacts were identified in the Final EIS/EIR.

Comment ID	Response
CC-3-21	Signage for the LPA will include station identification signage, wayfinding signage, and real-time electronic signage that provide real-time arrival information. Signage will primarily be located at station areas. Signage will follow the MRDC, which requires signs to be integrated into the design of stations, canopies, and other structures or elements that are part of the Project. Metro's Systemwide Station Design Standards and West Santa Ana Branch Transit Corridor Urban Design Guide also provide guidance on consistent identification signage. All signage and graphics will fully conform to the MRDC and follow the West Santa Ana Branch Transit Corridor Urban Design Guide and is not expected to degrade the visual character of the Affected Area. Any signs that are illuminated will not spill over onto adjacent properties. Lighting from signs will be comparable to lighting from the surrounding area. The signs will not use materials that will cast glare. Thus, signs are not expected to result in visual and aesthetic (including light and glare) impacts. Metro will coordinate with city staff on applicable standards per an executed Master Cooperative Agreement. Additional information regarding signage has been added to Chapter 4, Section 4.4.3.2 of the Final EIS/EIR and to the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report.*
CC-3-22	Construction Mitigation Measure VA-4 (Construction Screening) in the Draft EIS/EIR is referred to as to Mitigation Measure VA-3 (Construction Screening) in the Final EIS/EIR. Section 9-2.1401(d)(3) of the City of Artesia Municipal Code states that heavy-duty chain-link fence shall be erected during the construction period. The installation of a chain link fence will not shield views of construction activities and laydown areas from residential properties and other visually sensitive land uses. Mitigation Measure VA-3 (Construction Screening) will limit views of construction activities from residential properties and other visually sensitive land uses through the installation of screening that will obstruct views of construction activities and will be designed to be consistent with Metro requirements. With regard to temporary fencing around construction areas, the MRDC requires construction sites and contractors' areas to have temporary fencing and suitable barricades. Metro will also coordinate with the City of Artesia prior to the installation of the temporary screening elements to be consistent with the City's municipal code, as applicable.
CC-3-23	See responses to comments CC-3-15 and CC-3-16. City of Artesia Municipal Code Section 5-2.06 (f) includes non-permissible hours of construction between 7:00 p.m. and 7:00 a.m. on weekdays or at any time on Sunday or a federal holiday. As noted in the Final EIS/EIR under Mitigation Measure NOI-6 (Noise Control Plan), Metro will comply with local noise ordinances, including the City of Artesia Municipal Code. Mitigation Measure NOI-6 (Noise Control Plan) also includes noise-reduction measures such as the installation of temporary construction noise barriers, limiting unnecessary idling of equipment, and minimizing use of impact devices such as jackhammers, among other methods.
CC-3-24	Metro will obtain the applicable permits. During construction, utilities will be protected in place or relocated. Any disruptions that are necessary will be coordinated with the applicable jurisdiction and/or utility provider.
CC-3-25	Refer to response to comment CC-3-11 regarding refinements to the Pioneer Station parking structure made in coordination with the City of Artesia and response to comment CC-3-15 regarding elements of the Master Cooperative Agreement, including receiving a list of applicable standards.

Comment ID	Response
CC-3-26	See response CR-GEN-1 regarding identification of the LPA and responses to comments CC-3-5 and CC-3-7 regarding the content of the environmental document. The CEQA sections largely rely on and reference information presented earlier in each section that was originally presented in support of the NEPA analysis. All analysis is also based on the more detailed technical studies, which are also referenced at the beginning of each EIS/EIR section. The environmental analysis in the Final EIS/EIR was updated to reflect refinements made to the LPA in response to comments received on the Draft EIS/EIR and stakeholder coordination completed subsequent to circulation of the Draft EIS/EIR.
CC-3-27	Figure 2-19 in Chapter 2 of the Draft EIS/EIR illustrates the preliminary design of the Pioneer Station and access to the adjacent parking facility and TPSS. The figure is depicted in a northwest configuration showing the LRT alignment in a horizonal fashion. See response to comment CC-3-17 regarding parcels that will be affected by the LPA in the City of Artesia. Figure 4.3-17 (right side graphic) in Chapter 4, Section 4.3.3 of the Draft EIS/EIR is in a north configuration showing the property acquisitions related to the Pioneer Station parking facility on an aerial base map. Figure 4.3-17 in the Draft EIS/EIR does not identify the parcel along Pioneer Boulevard as a full acquisition for the Pioneer Station parking facility.
CC-3-28	The segment of 188th Street between Corby Avenue and Pioneer Boulevard will be closed to accommodate the park-and-ride structure. Chapter 2 provides an overview of the project description. Chapter 2 of the Final EIS/EIR includes revisions to identify street closures required for project elements. Information on impacts from the Project are included under the applicable topics in Chapters 3 and 4 of the Draft EIS/EIR. The closure of 188th Street was evaluated and analyzed in Chapter 3 of the Draft EIS/EIR, with level-of-service (LOS) presented in Table 3.14. Refer to the response to CC-3-29 for additional information on the analysis for 188th Street that was included in the Draft EIS/EIR. Regarding the closure of 187th Street, see response for CC-3-2.

Comment ID	Response
CC-3-29	Refer to the response to CC-3-28 regarding closure of 188th Street and the traffic analysis. As noted in Chapter 4, Section 4.2.3.2 of the Draft EIS/EIR, although 188th Street will be closed, vehicular, bicycle, and pedestrian access in the surrounding area will be maintained through the surrounding streets (i.e., Pioneer Street, South Street, and Corby Avenue), which are one or two blocks (or less than 500 feet) from the proposed street closure. Therefore, street closures will not adversely affect access to and from the surrounding communities. Additional discussion on the effects of street closures on pedestrian circulation and bicycle access has been added to Chapter 4, Section 4.2.3 of the Final EIS/EIR and in Section 5.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Communities and Neighborhoods Impact Analysis Report*, including at 188th Street. Mitigation Measure LU-1 requires coordination and support from the affected cities as it pertains to future bicycle facilities. Although the mitigation measure involves amending the language to each of the affected jurisdiction's bicycle plans, it requires the approval of the affected jurisdictions. Additionally, as explained in Chapter 4 Section 4.1.3.2 under the subheading "Consistency with Local Land Use Plans, Policies, and Regulations" of the Draft EIS/EIR, the planned bicycle facilities that could potentially be affected by the Project are not currently funded or scheduled for implementation and, thus, are not considered reasonably foreseeable. The Draft EIS/EIR concluded that even with implementation of Mitigation Measure LU-1, adverse effects would remain after mitigation because the measure is not fully under Metro's jurisdiction to implement. Nevertheless, Metro will continue to encourage, support, and recommend that the affected jurisdictions amend and/or develop bicycle plans and paths that maintain connectivity and mobility.
CC-3-30	The LOS grades in the analysis are based on delay, and those ranges are based on the Highway Capacity Manual (HCM). The relationship between delay and LOS has not changed since the 2010 HCM. Additionally, reported delay values were determined using the SimTraffic software, not the HCM methodologies. Simulation was determined to be a more robust and accurate means of projecting delay than the analytical methodologies in the HCM.
CC-3-31	The traffic analysis and LOS were based on intersection traffic counts, geometry, and signal timing observations. The year 2017 was used for the existing conditions analysis as that was the year the Notice of Preparation was filed, initiating the CEQA process. The industry-standard Synchro/SimTraffic software was used to conduct the assessment. Future developments are captured in the ambient growth, which was developed from output from the Metro Travel Demand Model. Further traffic circulation analysis is not required.
CC-3-32	Refer to the response to comment CC-3-2 regarding the design option included in the Final EIS/EIR. In response to comments received on the Draft EIS/EIR, including this comment, the traffic analysis was updated to include additional intersections in the City of Artesia, including the Alburtis Avenue/South Street intersection, which is shown in Table 5.4 in Section 5.1.2 of the Transportation Impact Analysis Report and in Chapter 3, Section 3.4.1.2 of the Final EIS/EIR. The Corby Avenue/South Street intersection was not analyzed or added to the traffic analysis based on an assessment of changes in traffic volumes resulting from the Project. Specifically, this intersection did not meet the threshold for inclusion in the traffic analysis as there will not be 50 or more project trips added to this location. Additionally, in response to this comment, the new intersection at the parking structure entrance/Solana Place on Pioneer Boulevard was added to the traffic analysis and is included in Table 5.4 in Section 5.1.2 of the Transportation Impact Analysis Report and in Chapter 3, Section 3.4.1.2 of the Final EIS/EIR. The other parking structure access intersection from Corby Avenue was not analyzed because that will not be a primary access point to the structure.

Comment ID	Response
CC-3-33	Refer to the response to comment CC-3-11 regarding modifications made to the entrance of the parking structure since the Draft EIS/EIR, including the addition of a traffic signal. As stated in response to comment CC-3-32, this intersection has been added to the traffic analysis prepared in support of the Final EIS/EIR. Regarding the Pioneer Boulevard and 188th Street intersection, under the No Build Alternative, the intersection will operate at LOS A (5 seconds/vehicle) for the overall intersection. While the northbound left-turn volumes will increase with the Project, the southbound through/right volume (462 vehicles/hour in the AM peak) are low enough to allow for the permissive left turn for the northbound left turn. Therefore, the total combined volume (less than 1,000 vehicles/hour) is low enough that the northbound queues will not reach to South Street. The intersection will be closed to accommodate the Pioneer Station park-and-ride structure under the LPA. To provide a conservative analysis, tail tracks were analyzed as part of the traffic analysis of the Pioneer Station, with an assumption of a gate down time of 45 seconds, a value that is consistent with the other terminus station locations in the Metro Rail system. However, typical train operations at the Pioneer Station will use the front end crossover north of the station platform to change train directions. The usage of the back end crossovers and tail track provides operational flexibility in the event of a service disruption or special service, and is only employed during normal operations. Information regarding the use of the tail tracks has been added to Chapter 2, Section 2.5.2.1 of the Final EIS/EIR, under the heading "From I-105/C Line Station to Pioneer Station."
CC-3-34	Due to the regional nature of the Project, the Metro Travel Demand Model was the appropriate tool for forecast, including ridership projection and mode split that determine the number of park-and-ride and kiss-and-ride trips within the vicinity of the proposed stations. Appendix A of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D to the Draft EIS/EIR) best summarizes the model output for the kiss-and-ride and park-and-ride turning movement volumes at the study intersections as a result of implementing the Project. As stated in response to comment CC-3-32, Corby Avenue is not the primary access point to the parking structure. Chapter 3, Section 3.5.1 of the Draft EIS/EIR included Project Measure TR PM-10 (Pioneer Station Parking Access), which stated that vehicle access to the parking structure would be directed through signage to enter/exit from Pioneer Boulevard.
CC-3-35	Appendix A of the West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report (Appendix D to the Draft EIS/EIR) included all intersection volume counts, including turning movements, for existing conditions, the No Build Alternative, and the Build Alternatives. The appendix has been updated to include the corresponding information for the intersections added to the traffic analysis since circulation of the Draft EIS/EIR. Metro provided the SimTraffic output to staff from various departments for review via email on July 20, 2022. These files are included as an attachment to the updated Final Transportation Impact Analysis Report that supports the Final EIS/EIR.
CC-3-36	Updated parking surveys were conducted on select streets near the Pioneer Station during non-holiday weekdays in March and May 2023 on Tuesdays, Wednesdays, and Thursdays between 6:30 a.m. and 8:30 a.m. and 11:00 a.m. and 2:00 p.m.. The survey time periods were determined based on the surrounding land uses and considered parking restrictions in each neighborhood. The visual survey map is included in Appendix A of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. Table 4.46 identifies parking by location (side street) and notes if there are parking restrictions. The parking identified is located in publicly accessible locations.

Comment ID	Response
CC-3-37	The parking demand noted in this comment is applicable to Alternative 1 in the Draft EIS/EIR. See response CR-GEN-1 regarding identification of the LPA and response to comment CC-3-39 regarding the updated spillover parking analysis for the LPA in the Final EIS/EIR.
CC-3-38	The parking demand noted in this comment is applicable to Alternative 2 in the Draft EIS/EIR. See response CR-GEN-1 regarding identification of the LPA and response to comment CC-3-39 regarding the updated spillover parking analysis for the LPA in the Final EIS/EIR.
CC-3-39	See response CR-TRA-1 regarding spillover parking impacts and additional transit parking. Consistent with the Draft EIS/EIR, the supply of parking in the parking structure will accommodate demand at the Pioneer Station. Additionally, the spillover parking analysis has been updated in the Final EIS/EIR to no longer rely on available on-street parking where the demand for transit parking is forecasted to exceed supply. Removing the availability of on-street parking as a consideration for transit parking provides a more conservative approach to the analysis of potential impacts related to spillover parking at the stations because it does not assume that demand could be met by using on-street parking, if available.
CC-3-40	As stated in Chapter 3, Section 3.4.4 of the Draft EIS/EIR for Alternatives 1 and 2, it is possible that adverse effects would remain after mitigation because parking demand, the subsequent strategies that may be utilized with implementation of the mitigation measures, and the community response are unknown. The analysis acknowledges that although model projections do not show parking demand exceeding supply, there is a potential for an adjustment period in the short term after the Project opens and passengers seek to find parking at certain locations.

Comment ID	Response
CC-3-41	Section 5.2.1.2 of the *West Santa Ana Branch Transit Corridor Project Final Land Use Impact Analysis Report* (Appendix E of the Draft EIS/EIR) discusses the potential land use impacts associated with the aerial alignment. Specifically, within the City of Artesia the Project will be on an aerial structure at Gridley Road/183rd Street. The aerial alignment will be situated within the PEROW and to the rear of residential and commercial properties. The highest point (35 feet) will be at the street intersection and the structure will decrease in height. The aerial structure will be approximately 25 feet or less to the rear of residential and commercial structures in the City of Artesia. The height and massing of the aerial structure will be compatible with the surrounding residential and commercial uses. Additionally, VA PM-8 (Residential Screening for Aerial Structures) has been added, which will screen the aerial structure from residential properties, making the aerial structure more compatible with the adjacent land uses where the soundwall is not sufficiently tall to provide similar privacy screening. This measure is described in Chapter 4, Section 4.4.4.1 of the Final EIS/EIR. The closure of 187th Street at the railroad ROW is not expected to create a significant impact related to the physical division of a community within the City of Artesia because access to the other side of the railroad ROW will be provided along 186th Street, 188th Street, and South Street, all of which are within 1,100 feet of 187th Street. The closure of 187th Street will not interfere with vehicular access and mobility to community assets and residential neighborhoods as alternate routes between both sides of the affected streets will be available, and vehicular access to all properties will be maintained. Thus, the closure of 187th Street at the railroad ROW will not adversely affect the character and cohesion of the City of Artesia. Analysis of a new design option (closure of 186th Street, 187th Street remains open) has been incorporated as Section 4.1.3.3 in the Final EIS/EIR and in Section 5.3 in the *West Santa Ana Branch Transit Corridor Project Final Land Use Impact Analysis Report*. Traffic impacts are discussed in Chapter 3, Section 3.4.1 of the Draft EIS/EIR and Section 5.1.2 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. As noted in Table 5.4 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*, intersections in the City of Artesia will not result in adverse effects. See response to comment CC-3-13 regarding noise impacts. Noise mitigation measures are identified in Section 4.7.4.2 of the Draft EIS/EIR to reduce potentially significant noise and vibration effects that will occur during construction activities and during operations, with updated measures included in Section 4.7.4.2 of the Final EIS/EIR.
CC-3-42	See response to comments CC-3-31 and CC-3-32 regarding the traffic methodology. South Street at the I-605 northbound and southbound off-ramps and Pioneer Boulevard at the SR-91 eastbound and westbound off-ramps did not meet the threshold for inclusion in the traffic analysis as there will not be 50 or more project trips added to these locations.
CC-3-43	See response to comment CC-3-39.
CC-3-44	See response to comment CC-3-2.
CC-3-45	See response to comment CC-3-2.

Comment ID	Response
CC-3-46	See response to comment CC-3-16. As discussed in Chapter 4, Section 4.4.3.2 of the Draft EIS/EIR, station areas are designed to be sensitive to the specific urban context. Pedestrian-oriented and public art will be installed to improve visual character. Stations will be designed to be consistent with Metro's Systemwide Station Design Standards, which allows flexibility to accommodate the visual character and identity of the surrounding community, including public art and landscaping. The MRDC requires that stations be designed to reflect the specific urban context of each station. The MRDC also requires that ornamental landscaping be provided for stations and landscaping should add to the character and identity of the existing neighborhood and is responsive to and complementary with station architecture, art, signage, graphics, and lighting design.
CC-3-47	See response to comment CC-3-16.
CC-3-48	As discussed in Chapter 4, Section 4.1.1.2 of the Draft EIS/EIR, "For purposes of the land use analysis, the Affected Area for land use is defined as the area within approximately 50 feet of the Build Alternatives, including the proposed alignment, stations, parking facilities, TPSSs, and MSF site options as these adjacent areas have been identified to be the area of potential impact." A distance of 50 feet was selected as the land uses immediately adjacent to the project components would be directly affected by land use compatibility issues associated with the project components. The specific plans identified in this comment are outside of the Affected Area and, thus, were not analyzed in the land use section. Nevertheless, the LPA will be consistent with these specific plans. The primary objectives of the Artesia Live Specific Plan, which is approximately 0.6 mile north of the Pioneer Station, are to identify land use options that include increased housing densities and mixed uses, as well as create pedestrian linkages, between community facilities and major recreation, retail, and residential nodes of activity, The Artesia Live Specific Plan includes the development of a mixed-use project that consists of a hotel, commercial, and residential uses. Applicable goals of the Pioneer Specific Plan include encouraging a pattern of mixed-use development that takes maximum advantage of the physical, social, and economic potential of the specific plan area without adversely impacting the adjacent viable residential and commercial properties and encouraging design standards that promote pedestrian and commercial activity and a quality living environment for the City's senior residents. Development associated with the Pioneer Specific Plan includes commercial retail and senior housing. The Pioneer Specific Plan encourages pedestrian-friendly amenities. The Artesia Live II Specific Plan consists of a mixed-use development with residential condominiums, retail, and restaurant uses. Applicable goals of the South Street Specific Plan include encouraging a pattern of commercial retail uses that takes maximum advantage of the physical, social, and economic potential of the specific plan area without adversely impacting the adjacent viable residential and commercial properties, and encouraging design standards that promote pedestrian and commercial activity. The South Street Specific Plan permits commercial land uses (office, retail, and restaurant) that serve the local and regional markets. As with the Pioneer Specific Plan, the South Street Specific Plan encourages pedestrian-friendly amenities. The LPA will not conflict with these specific plans because the LPA will provide transit stations that may encourage and promote development (such as higher-density development, mixed commercial/residential uses, affordable housing, neighborhood-oriented and regional retail, and employment opportunities) within the specific plan areas.
CC-3-49	See response to comment CC-3-39.

Comment ID	Response
CC-3-50	See response to comment CC-3-2. Although 187th Street is proposed for closure as part of the LPA (with 186th Street being closed instead if the design option is implemented), pedestrian crossings will be added to the north and south sides of 187th Street to maintain pedestrian bicycle circulation, preserving pedestrian and bicyclist access and connectivity to downtown Artesia and the surrounding neighborhood. The Artesia Historic District Recreational Trails will remain, and access will be maintained. The LPA will not preclude future development of a bike path along the PEROW. There is sufficient room within the PEROW to accommodate the proposed Pioneer Station and a future bike path in the area. All mitigation measures listed in the Final EIS/EIR will be part of the Mitigation Measure Report Program.
CC-3-51	See responses to comments CC-3-2 and CC-3-50. Pedestrian access will be maintained, as this will be the northern station entrance for the Pioneer Station.
CC-3-52	Demographic information presented in Chapter 4, Section 4.2 of the Draft EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Communities and Neighborhoods Impact Analysis Report* (Appendix G to the Draft EIS/EIR) is based on data from the U.S. Census Bureau and Southern California Association of Governments (SCAG). As described in Section 4.2.2 of the Draft EIS/EIR, an indicator of the stability of a community or neighborhood can be determined by how long the residents have lived at their current addresses. SCAG does not provide data with regard to the length of time residents have lived at their current address. The only available U.S. Census Bureau data regarding length of time residents have lived at their current address is the American Community Survey data for residents in the same house after one year. No other demographic data are available that show the length of time residents have lived at their current address. Metro will continue to coordinate with local jurisdictions regarding First/Last Mile (FLM) improvements, including pedestrian and bicycle connections, in accordance with the Metro First/Last Mile Guidelines. Improvements focus on specific pedestrian connections within 0.5 mile of stations and connections to bike networks within 3 miles of stations in coordination with cities and key stakeholders. Pursuant to the Metro FLM Guidelines, cities are responsible for advancing the design, environmental clearance (if needed), construction, and maintenance of FLM connections.
CC-3-53	See response to comments CC-3-11, CC-3-12, and CC-3-48. Section 5.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Land Use Impact Analysis Report* (Appendix E to the Draft EIS/EIR) discusses how the Project is consistent with applicable goals and policies of the City of Artesia General Plan as it relates to alternative modes of transportation, transit opportunities, and increased residential and commercial densities around transit facilities and major corridors. See response to comment CC-3-17 regarding acquisitions. Acquisitions and displacements have been minimized as feasible. See response CR-DIS-1 regarding compliance with the Uniform Act and California Relocation Act.
CC-3-54	See response CR-DIS-2 regarding updates to the acquisition and displacement data for the LPA. Chapter 4, Section 4.3.3 of the Final EIS/EIR has been updated to state that the affected residential acquisitions are not rent-controlled units. See Common Response CR-DIS-1 regarding compliance with the Uniform Act and California Relocation Act. When a relocation occurs, including rent-controlled units, a specific individual relocation process will be established for each business/residence and potential sites will be analyzed and considered. Coordination with affected businesses/residents is required as part of this process and will occur after the Record of Decision for the Final EIS is issued.

Comment ID	Response
CC-3-55	Mitigation Measure VA-3 (Construction Screening) has been revised to include residential properties as a type of sensitive land use where construction activities and laydown areas will be screened from view. Refer to Chapter 4, Section 4.19.3.4 of the Final EIS/EIR for the updated measure. The suggested language is similar to language that will be provided in the construction management plan. These types of measures will be applied along the entirety of the Project, as applicable, and not only to the City of Artesia. Section 4.2 of the *West Santa Ana Branch Transit Corridor Project Final Construction Methods Report* (previously Appendix L of the Draft EIS/EIR) states that construction staging areas will include areas for parking for field personnel. As discussed in the CEQA determination discussion in Section 4.19.3.4 of the Draft EIS/EIR and in Section 7.4.3.2 of the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* (previously Appendix I to the Draft EIS/EIR), project-related construction activities are required to comply with the South Coast Air Quality Management District Rule 403, which does not permit track-out dust to extend 25 feet or more beyond the active construction area and requires all track-out dirt to be removed at the end of each workday or evening shift.
CC-3-56	VA PM-6 (Local Zoning Ordinances) specifically pertains to scenic quality. Language has been added to VA PM-6 (Local Zoning Ordinances) to clarify that the project measure pertains to scenic quality. However, per the terms of the Master Cooperative Agreement, design plans will be provided to the city for review.

Comment ID	Response
CC-3-57	See response CR-GEN-3 regarding the Cut-and-Cover Study. Metro met with city staff on September 29, 2022, and the Technical Advisory Committee on October 3, 2022, to discuss results of the Cut-and-Cover Study. In a letter dated October 10, 2022, the City withdrew the request for consideration of underground alignments as alternatives to the LPA. An at-grade alignment at the intersection of Gridley Road/183rd Street is not feasible due to the street geometry and safety challenges at this intersection. An at-grade alignment at this location will require street restriping, lane configuration changes, potential property acquisitions, pedestrian and traffic safety improvements, traffic signaling changes, and reduced operational speeds. It was concluded that an at-grade configuration will remain operationally challenging even with safety improvements. In the City of Artesia, the PEROW is primarily situated to the rear of properties. The aerial structure at Gridley Road/183rd Street will be supported by retaining walls and columns northwest of Gridley Road/183rd Street. The aerial structure will be situated to the rear of the affected residential properties. Although residents of these properties will be able to see the retaining wall and/or columns from their backyards, many of the residential properties that will have views of the aerial structure currently have views of the rear of commercial buildings that are at a similar height as the proposed aerial structure. As discussed under "Aerial Structures" in Table 4.4.8 in Chapter 4, Section 4.4.3.2 of the Draft EIS/EIR, the aerial structure will be visible to residents, and the scale and massing will be consistent with the surrounding structures and fit with the character and context of the area. The aerial structure will not degrade visual character and quality of rail ROWs and the Affected Area. A TPSS and a parking structure will be located outside of the PEROW. As identified in Project Measure VA PM-4 (Landscaping Screening), TPSSs in residential areas will either be landscaped or incorporate design features to screen or improve the appearance of the TPSS. The parcels on which the parking structure will be located will be landscaped consistent with the local zoning ordinance as identified in Project Measure VA PM-6 (Local Zoning Ordinances). Landscaping that is installed will also be consistent with the MRDC or Metro Systemwide Station Design Standards, as identified in Project Measure VA PM-3 (Landscaping). The use of landscaping will soften the appearance of the project components and maintain, rather than degrade, the visual character of residential areas. A discussion has been added in Chapter 4, Section 4.4.4.1 of the Final EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* (previously Appendix I to the Draft EIS/EIR), as applicable, explaining how the project measures (VA PM-1 through VA PM-8) will reduce visual and aesthetic impacts.
CC-3-58	Table 4.5.9 and related analysis in Chapter 4, Section 4.5.3.1 of the Final EIS/EIR and Table 5.1 in Section 5.1.1 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (previously Appendix J of the Draft EIS/EIR) has been revised to clarify the transportation analysis as the source of the information.
CC-3-59	The concurrence from the Transportation Conformity Working Group has been added to the appendix for the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (previously Appendix J of the Draft EIS/EIR).

Comment ID	Response
CC-3-60	The construction durations listed in Table 4.1 of the *West Santa Ana Branch Transit Corridor Project Final Construction Methods Impact Report* (previously Appendix L of the Draft EIS/EIR) have been updated to reflect revised assumptions and durations for construction scheduling. After the release of the Draft EIS/EIR, coordination with key stakeholders continued, resulting in refinements to the LPA and a better understanding of project risks. Based on additional stakeholder feedback, staff has reassessed the schedule duration and contracting approach to reflect multiple contract packages. As such, the construction schedule has been modified from six years as shown in the Draft EIS/EIR to approximately eight years. Table 7.1 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (previously Appendix J of the Draft EIS/EIR) was removed from the Final EIS/EIR, and the final report instead references Table 4.1 of the West Santa Ana Branch Transit Corridor Project Final Construction Methods Impact Report. Emissions analyses were updated using the revised construction durations and schedule for all pollutants in the air quality analysis that supports the Final EIS/EIR. Emissions analyses reflect the point in time when the highest number of construction activities are occurring concurrently, so not all construction activities are included at a single point in time. Multiple scenarios were analyzed to determine the point in time with the highest quantity of construction emissions. See Section 7.2 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* for additional details regarding emissions analyses methodology.
CC-3-61	The *West Santa Ana Branch Transit Corridor Project Final Construction Methods Impact Report* (Metro 2021g) (Appendix L of the Draft EIS/EIR) was used as the basis of the emissions calculations presented in the Draft EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (Appendix J to the Draft EIS/EIR). The reference in Section 7.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* was incorrectly cited as (Metro 2020g) but the analysis did use the correct version of the report.
CC-3-62	Construction activities for the MSF site options were modeled separately from the other components of the Project in the Draft EIS/EIR. The MSF construction emissions were included in the maximum daily regional emissions analysis disclosed for all alternatives by combining them with the LRT construction emissions results from the first CalEEMod file. The "Worker Trip Number" values in the analysis represent one-way trips. Each instance of 300 one-way trips associated with each project component corresponds to 150 round trips, which is consistent with the values summarized in Table 7.2 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (Appendix J of the Draft EIS/EIR). The total daily one-way worker trips included in the regional emissions analysis for Alternatives 1 and 2 was 1,800 trips, which is consistent with the 900 round trips presented in Table 7.2. Refer to the MSF construction CalEEMod output file in the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (Appendix J of the Draft EIS/EIR) for additional detail. Chapter 4, Section 4.19.3.5 of the Draft EIS/EIR stated that Alternative 3 construction emissions modeling accounted for 120 daily haul truck loads and 700 construction crew vehicles. These values are the daily vehicle activity that was accounted for in the Alternative 3 construction emissions modeling, which was estimated by multiplying the Alternative 1 and 2 daily haul truck emissions by 80 percent and the daily worker trip emissions by 7/9 (approximately 78 percent).
CC-3-63	Section 7.3 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (previously Appendix J of the Draft EIS/EIR) that was prepared in support of the Final EIS/EIR has been revised to correct the typographical error.

Comment ID	Response
CC-3-64	Alternative 3 is identified as the LPA in the Final EIS/EIR. See GEN-1 regarding LPA identification. Table 7.5 in Section 7.3.4.1 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (Appendix J of the Draft EIS/EIR) summarized the maximum daily air pollutant emissions that would be generated during construction of Alternative 3. The CalEEMod output files for the light rail corridor construction emissions and the MSF construction emissions are included as Appendix A to the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report*. The maximum daily emissions shown in Table 7.5 represent the combined (summed) emissions from the two CalEEMod output files (light rail corridor + MSF) included in the appendix, accounting for the adjustments described above in response to comment CC-3-62. (Table 7.5 (120 daily haul truck trips instead of 150 and 700 daily worker vehicle trips instead of 900 as modeled for Alternative 1 and Alternative 2)).
CC-3-65	Alternative 3 will not generate emissions that exceed the regional or localized significance thresholds established by the South Coast Air Quality Management District (SCAQMD) as shown in Chapter 4, Table 4.19.6 and Table 4.19.7 of the Draft EIS/EIR. Therefore, no mitigation measures are required to comply with the CEQA regulation. See response CR-AQ-3 regarding air quality impact thresholds and guidance, and Metro-related policy.
CC-3-66	Alternative 3 is identified as the LPA in the Final EIS/EIR. The LPA does not include construction of underground stations.
CC-3-67	The text in the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (Appendix J of the Draft EIS/EIR) related to Alternatives 3 and 4 was in comparison to the analysis for Alternatives 1 and 2. Tables 7.4 through 7.6 in this report summarized the maximum daily emissions for construction of each Build Alternative and accounts for all sources involved in construction activities that could be occurring on a given day, including those associated with construction of the MSF.
CC-3-68	Emissions that will be generated by construction of the MSF are accounted for in the maximum daily emissions included in Table 7.5 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (Appendix J of the Draft EIS/EIR). The values shown in Table 7.5 reflect the combined (summed) emissions from construction of the light rail corridor and MSF CalEEMod output files provided in the appendix to the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (Appendix J of the Draft EIS/EIR), with adjustments made as described in response to comment CC-3-64, above: maximum daily haul truck loads reduced from 150 to 120 and maximum daily worker vehicle trips reduced from 900 to 700 for Alternative 3 relative to Alternatives 1 and 2. Consistent with the conclusions described in the Draft EIS/EIR for construction of Alternative 3, the analysis in the Final EIS/EIR for the LPA determined that construction will not generate emissions in excess of any SCAQMD regional or localized threshold, and impacts will be less than significant.
CC-3-69	The appendix provided in the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (Appendix J of the Draft EIS/EIR) included all relevant modeling files. This same information was also included in the appendices for the *West Santa Ana Branch Transit Corridor Project Final Greenhouse Gas Emissions Impact Analysis Report* (Appendix K of the Draft EIS/EIR) and the *West Santa Ana Branch Transit Corridor Project Final Energy Impact Analysis Report* (Appendix U of the Draft EIS/EIR).

Comment ID	Response
CC-3-70	In response to this comment, the analysis contained in the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* and the *West Santa Ana Branch Transit Corridor Project Final Greenhouse Gas Emissions Impact Analysis Report* have been updated for the Final EIS/EIR using CalEEMod version 2020.4.0. The updated results are included in Chapter 4, Section 4.19 of the Final EIS/EIR and Section 7.3.2 of the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report*. The analysis in the *West Santa Ana Branch Transit Corridor Project Final Greenhouse Gas Emissions Impact Analysis Report* has also been updated. Consistent with the conclusions described in the Draft EIS/EIR for Alternative 3, the greenhouse gas (GHG) emissions analysis in the Final EIS/EIR determined that construction and future operation of the LPA will result in less than significant impacts. The LPA will provide environmental benefits by inducing a net decrease in annual GHG emissions—approximately 8,202 metric tons of carbon dioxide equivalents (8,202 $MTCO_2e$) per year—through the indirect displacement of mobile source emissions resulting from transportation mode shift from passenger vehicle trips to light rail transit trips.
CC-3-71	All revisions made to the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (previously Appendix J of the Draft EIS/EIR) have been incorporated into Chapter 4, Sections 4.5 and 4.19.3.5 of the Final EIS/EIR. Refer to the responses to prior comments for specific edits made to the impact reports and Final EIS/EIR sections.
CC-3-72	The emissions modeling completed for the Draft EIS/EIR accounted for the demolition activities detailed in Table 4-1 of the *West Santa Ana Branch Transit Corridor Project Final Construction Methods Report* (Appendix L to the Draft EIS/EIR), although this information was not identified in Tables 7.1 and 7.2 of the *West Santa Ana Branch Transit Corridor Project Final Greenhouse Gas Emissions Impact Analysis Report* (Appendix K to the Draft EIS/EIR). The analysis in the Final EIS/EIR reflects the information in Table 4.1 of the *West Santa Ana Branch Transit Corridor Project Final Construction Methods Impact Report.*
CC-3-73	The export and import quantities listed in Table 7.3 in the *West Santa Ana Branch Transit Corridor Project Final Air Quality Impact Analysis Report* (Appendix J to the Draft EIS/EIR) were correct at the time of the Draft EIS/EIR. Subsequent calculations to reflect design refinements have resulted in updates to the export and import quantities, which are included in Table 4.19.8 in Chapter 4, Section 4.19.3.5 of the Final EIS/EIR and reflected in construction air quality and GHG analysis.
CC-3-74	See response to comment CC-3-70.
CC-3-75	The GHG emissions analysis documented in Chapter 4, Section 4.6 of the Final EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Greenhouse Gas Emissions Impact Analysis Report* has been updated to reflect responses to public comments related to GHG emissions. See responses to prior comments for specific changes. Consistent with the conclusions described in the Draft EIS/EIR for Alternative 3, the GHG emissions analysis in the Final EIS/EIR determined that construction and future operation of the LPA will result in less than significant impacts. The LPA will provide environmental benefits by inducing a net decrease in regional GHG emissions—approximately 8,202 metric tons of carbon dioxide equivalents (8,202 $MTCO_2e$) per year—through the indirect displacement of mobile source emissions resulting from transportation mode shift from passenger vehicle trips to light rail transit trips.

Comment ID	Response
CC-3-76	Section 1.5.5 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (Appendix M to the Draft EIS/EIR) documents the methodology used for vibration assessment. The report identifies that the Federal Transit Administration (FTA) General Assessment procedures were applied, which use generalized data to develop a curve of vibration level as a function of distance from the track. As stated in Section 1.5.5, the General Assessment was used to predict where potential vibration impacts would occur. The appropriateness of this approach is further documented in the FTA Transit Noise and Vibration Impact Assessment Manual, which is referenced as (FTA 2018) in the Impact Analysis Report. The Impact Assessment Manual, in Section 6.4, states "In the General Vibration Assessment, it is preferable to make a conservative assessment of the impact and include buildings that may ultimately not be subject to impact." The manual also states that following the General Vibration Assessment procedures, if the "Projected vibration is below the impact threshold [then v] vibration impact is unlikely, and the environmental document should state this." Additionally, the manual states that if the "Projected ground-borne vibration is 0 to 5 dB greater than the impact threshold [then t]here is a strong chance that actual ground-borne vibration levels will be below the impact threshold. The environmental document should report impact at these locations as exceeding the applicable threshold, present possible mitigation measures and costs, and commit to conducting more detailed studies to refine the vibration impact analysis during the engineering phase." Mitigation Measures VIB-3 (Vibration Control Plan) through VIB-7 (Construction Monitoring for Vibration Near Historic Properties/Historical Resources) are anticipated to avoid construction vibration levels that would exceed the FTA construction impact criteria. Therefore, impacts related to construction vibration will be less than significant with mitigation incorporated.
CC-3-77	The emergency generators are only used for emergency situations and do not represent a regular source of noise, such as the LRT vehicle noise or audible warnings at at-grade crossings. Therefore, emergency generators are not included in the noise analysis.
CC-3-78	Train length shown in Table 1.1 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (Appendix M to the Draft EIS/EIR) is number of carriages (i.e., the train consist). The value is unitless.
CC-3-79	The automatic volume adjustment controls on the public address system are components of the Project and included as part of the standard Metro design for stations. The automatic volume adjustment controls are not necessary to mitigate an impact and therefore are not included as a mitigation measure. See response CR-NOI-1 regarding the noise impacts analysis and proposed mitigation measures to reduce noise levels during construction and operational activities.

Comment ID	Response
CC-3-80	The noise analysis in the Draft and Final EIS/EIR follows the Detailed Noise Analysis Procedure per the FTA Transit Noise and Vibration Impact Assessment Manual, 2018. The Detailed Noise Analysis Procedure considers LRT sources of noise (LRT pass-by noise, TPSS noise, special trackwork, and crossing signals) and mitigation measures, such as soundwalls. The noise analysis considers the distance of receptors from the source, speeds, special trackwork (crossovers) noise penalties, intervening building rows, as well as the noted track elevation for aerial guideways. The analysis for determining barrier noise attenuation considers topography, receptor, source, and barrier elevations, respective heights and distances of each of these noted elements, along with barrier height. As noted in the comment, many of the listed variables have been included in the analysis to determine the effectiveness of mitigation and mitigated noise levels. The noise analysis was reviewed by FTA and found to be consistent with the Detailed Noise Analysis Procedure to assess transit noise. The level of detail satisfies both the requirements of NEPA and CEQA. See response CR-NOI-1 regarding guidance used for the noise impacts analysis and proposed mitigation measures to reduce noise levels during construction and operational activities.
CC-3-81	The standards noted in the comment are included in Table 3.18 in Section 3.4.11 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (Appendix M of the Draft EIS/EIR). The City of Los Angeles specifically notes 75 dBA at 50 feet as the construction equipment noise standard. The standards included in the City of Artesia Municipal Code are more similar to operational noise standards based on the lower limit of noise. The limit of the noise standard will not permit construction within the City of Artesia as most construction equipment will exceed the standard upon being started. Time limitations are one of the methods a city or public agency may try to limit exposure to construction noise. Per the City of Artesia General Plan Update Environmental Impact Report 2010, "As noted above, Municipal Code Section 5-2.06 Prohibited Noise – Specific Violations, allows construction noise provided activities occur between the hours of 7:00 AM and 7:00 PM." The exemption for construction noise occurring between 7:00 AM and 7:00 PM is also noted in the Arkansas Street Residential Development and Specific Plan Noise Impact Study, prepared by the City of Artesia and dated July 25, 2022. Draft EIS/EIR Mitigation Measure NOI-8 requires the preparation of a Noise Control Plan to minimize construction noise. As required by Mitigation Measure NOI-8, "If nighttime construction is planned, a noise variance may be prepared by the contractor, if required by the jurisdiction, that demonstrates the implementation of control measures to maintain noise levels below the applicable FTA standards." This measure is referred to as Mitigation Measure NOI-6 (Noise Control Plan) in the Final EIS/EIR. See response CR-NOI-1 regarding guidance used for the noise impacts analysis and proposed mitigation measures to reduce noise levels during operational activities. See response CR-NOI-2 regarding construction activities and mitigation.
CC-3-82	The noted language was written based on guidance provided by the 2018 FTA Transit Noise and Vibration Impact Assessment Manual and is not a direct quotation of text. The FTA guidance mandates specific noise impact criteria for transit operations based on existing ambient noise levels. Local city jurisdictions typically include "brightline" operational noise thresholds that may already be exceeded under the existing condition. A brightline noise threshold is a set number that does not take into account existing conditions and the potential for a project to result in a noticeable increase over existing conditions. The FTA operational noise impact criteria take into consideration the existing condition and the potential human response to changes in the existing condition.

Comment ID	Response
CC-3-83	Appendix G CEQA Checklist questions are addressed in Section 4.7.5 of the Draft EIS/EIR and in Section 6 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (Appendix M of the Draft EIS/EIR). Regarding using the FTA noise criteria, Appendix G of the CEQA Guidelines states that "[t]he following is a sample form that may be tailored to satisfy individual agencies' needs and project circumstances." Metro, as the CEQA lead agency, has the responsibility to determine the appropriate criteria for the Project. In adding an additional requirement, to compare the project-generated noise against the FTA impact criteria in addition to local general plans and ordinances, Metro has expanded the scope of the sample criteria. The FTA noise impact criteria were specifically developed to address transit noise based on well documented criteria and research on human response to community noise. The FTA noise criteria take into consideration the change from the existing condition and how noise generated by a project would result in noticeable, potentially impactful changes in the ambient noise environment. The existing ambient noise measurements form the baseline that determines the moderate and severe impact criteria and what increase may occur before these criteria for impacts are exceeded. The analysis includes consideration of the existing ambient noise and mitigation where the FTA criteria are exceeded. The City of Artesia General Plan Noise Element Noise and Land Use Compatibility Matrix was not developed for transit noise and does not take into account changes from existing conditions. It is frequently the case that the standards included in land use and noise compatibility matrices are already exceeded under existing conditions. For informational purposes, predicted operational LRT noise levels after implementation of mitigation will be in the range of 41 to 65 dBA L_{dn} for the entirety of the project extent. These noise levels will be in the residential (low density) normally acceptable range of 50 to 60 dBA L_{dn} conditionally acceptable range of 55 to 70 dBA L_{dn} as listed in Table 5.6-1 of the City of Artesia General Plan Noise Element.
CC-3-84	See responses to comment CC-3-81 and CC-3-83. The *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR) has been revised to remove "The project would be located in multiple jurisdictions with competing noise standards."
CC-3-85	See response to comment CC-3-81.
CC-3-86	The noise analysis includes the appropriate speed, elevation, and track type adjustment for the retained fill and elevated guideways in the City of Artesia and the predicted noise levels and impacts at nearby sensitive receptors. See Figure 4.7-11 in Section 4.7.4 of the Draft EIS/EIR for a depiction of proposed mitigation and potential residual impacts after mitigation in the City of Artesia. As described in Section 4.7 of the Final EIS/EIR, the analysis has been updated since circulation of the Draft EIS/EIR. The updated results are included in Sections 4.7.3 and 4.7.4.2 of the Final EIS/EIR. See response CR-NOI-1 regarding guidance used for the noise impacts analysis and proposed mitigation measures to reduce noise levels during operational activities.

Comment ID	Response
CC-3-87	Chapter 4, Section 4.11.3 of the Draft EIS/EIR discusses design features that will be implemented to address water quality impacts and ensure compliance with existing stormwater permits. As discussed in Section 4.11.3, low-impact development (LID) best management practices (BMPs) will be implemented at station parking facilities. The specific LID BMPs will be identified in later stages of design as design advances. Specific storm drain improvements required to provide adequate drainage for the Project will be developed as design advances. These improvements will also preserve drainage patterns and meet local standards. Additionally, specific water quality controls will be identified as design advances. With implementation of the design features described in Section 4.11.3.1 of the Draft EIS/EIR, the Project will not result in adverse effects to water quality; therefore, mitigation will not be required.
CC-3-88	The reference to Section 2 has been changed to Section 3. Section 3 of the *West Santa Ana Branch Transit Corridor Project Final Water Resources Impact Analysis Report* (previously Appendix T of the Draft EIS/EIR) discusses the regulatory and permit requirements.
CC-3-89	Operational energy consumption was estimated based on the reduction in regional vehicles miles traveled for passenger vehicles, electricity needed to power the stations and tracks, and energy required to operate the MSF. Since completion of the Draft EIS/EIR, these have not changed. The calculations were refined in the Final EIS/EIR with respect to the LPA to reflect newer energy consumption factors from EMFAC2021 and more precise information about Metro's fleet consumption rates. The operational results are reflected in Table 4.12.4 in Section 4.12.3.2 of the Final EIS/EIR. CalEEMod modeling has been revised to reflect an updated construction schedule for the LPA. The updated analysis is incorporated in Chapter 4, Section 4.19.3.12 of the Final EIS/EIR and in Chapter 7 of the *West Santa Ana Branch Transit Corridor Project Final Energy Impact Analysis Report*. The analysis has been updated with the construction-related energy use associated with off-road equipment, diesel trucks, and gasoline-powered vehicles. Similar to the conclusions in the Draft EIS/EIR for Alternative 3, the LPA will not result in a significant impact related to energy resource consumption during construction activities. The same updated CalEEMod modeling was also used to update the air quality and GHG emissions analyses.
CC-3-90	The City of Artesia Historic District Recreational Trail was completed in April 2021 during the preparation of the Draft EIS/EIR and approximately three months prior to the public release of the Draft EIS/EIR. In response to this comment, the City of Artesia Historic District Recreational Trail has been added to existing conditions and analysis in Section 4.16.2.2 and in Table 4.16.2 of Chapter 4 of the Final EIS/EIR. The engineering plans included in Appendix B have also been updated to include the recreational trail.
CC-3-91	Appendix A of the *West Santa Ana Branch Transit Corridor Project Construction Methods Report* (Appendix L of the Draft EIS/EIR) identified utilities that could be affected by the Project, including the owner, type, size, location, and the disposition (e.g., protect in place, relocate). This information has been updated for the Final EIS/EIR and is included as Appendix A in the updated *West Santa Ana Branch Transit Corridor Project Construction Methods Report.* Chapter 4, Section 4.19.2.4 of the Final EIS/EIR includes a reference to this appendix. Due to FTA page length requirements, not all utilities within all cities along the alignment can be identified within the body of the EIS/EIR.

City of Bell

From: Manuel Acosta <MAcosta@CITYOFBELL.ORG>
Sent: Tuesday, September 28, 2021 4:36 PM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Carlos Islas <cislas@CITYOFBELL.ORG>
Subject: RE: WSAB EIR Comments

Hi Meghna,

Attached please find the City of Bell EIR comments. Sorry for the delay.

If you have any questions please feel free to contact me.

CC-11-1

CITY of BELL

Manuel Acosta
Community Development Director

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September 28, 2021

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

Re: Comments West Santa Ana Branch Transit Corridor Draft Environmental/Environmental Impact Report

Ms. Khanna,

The City of Bell is pleased to submit its comments on the West Santa Ana Branch Transit Corridor Draft Environmental/Environmental Impact Report. The City believes that this is a great project and there is a great need for efficient public transportation, the City does have some concerns with the mitigation measures and impacts this project may have in our City and surrounding community. CC-11-2

General Comments

1. The intersections identified under the jurisdiction of the City of Bell included: 48-Gage Ave/California Ave; 49-Gage Ave/Salt Lake Ave (West); and 51-Bell Ave/Bissell St. It appears that 2 additional intersections in the City were incorrectly identified as being in the City of Huntington Park: 50-Bell Ave/California Ave; and 52-Bell Ave/Salt Lake Ave. Please confirm the jurisdiction of intersections number 50 and 52. CC-11-3
2. Section 9, References. Several items directly related to the West Santa Ana Branch analysis by Los Angeles County Metropolitan Transportation Authority (Metro) do not provide hyperlinks to easily cross reference. For example, first reference on page 9-3, Corridors Base Model 2018 Calibration and Validation Report, does not provide a hyperlink to the document. CC-11-4
3. There are no analysis sheets provided that detail the HCM/Synchro model analysis of the study intersections. The City is unable to determine if the Synchro analysis is correct without reviewing the analysis sheets. Please provide all Synchro analysis sheets, including the Synchro input files, for the City's review. CC-11-5
4. There are pages that appear to be left blank intentionally. Please identify these pages appropriately (see Page A6-2 for example). CC-11-6
5. Tables showing Headways do not clarify that headways are in minutes. Sample see Table 5.17. CC-11-7

Appendix D – Transportation Impact Analysis Report

1. Page 1-6, last paragraph – The paragraph begins with "Figure 1-2". This is the wrong reference. Should this be Figure 1-1? CC-11-8

6330 Pine Avenue, Bell, California 90201 • Phone (323) 588-6211 Fax (323) 771-9473

2. Section 1.5.1, Analysis Approach: Traffic Operations (Page 1-7) – What are the default value inputs used for coding the HCM/Synchro model analysis? Program default values may not represent study locations and should be adjusted to simulate actual field conditions. Section 9 References do not appear to include any analysis detail reports/studies. CC-11-9

3. Section 1.5.10, Applying LOS for Impact Assessment (Page 1-14) – How did the HCM/Synchro software simulate a rail crossing operation? It is our understanding that Synchro has limited ability to properly simulate a train crossing event. The main concern in using the Synchro software is that the schedule of events (an event is a train crossing and activating the gate) cannot be set and controlled in the model. So, even though headways of the trains are known, that information cannot be inputted into the model. The model generates vehicles randomly and as a result, a fixed set of assumptions and known conditions could generate different output results in separate runs. How many Synchro analysis runs were conducted to determine the delay and 95% vehicular queue for the study intersections? CC-11-10

4. Figure 2-2. Project Alignment by Alignment Type (Page 2-4) – The line definitions/legends for the "At-Grade, Aerial, and Underground" call outs are difficult to determine because of the scale of the map. Unless the reader translates line-by-line the details found on pages 2-12 to 2-14, the different line types are not distinguishable. How can this Figure be improved to clearly identify the proposed track position? CC-11-11

5. Table 4.46. On-Street Parking Conditions: Proposed Locations (Page 4-50) – Parking demand observations were made in 2017. Based on these observations near the Florence/Salt Lake station, the parking demand was 30%. Additional details on the observed parking can be found in Table 4.62. CC-11-12

Station	Parking Survey Area [3] (acres)	Applicable Alternative(s)	Existing On-Street Parking Spaces	Observed Field Utilization
Florence/Salt Lake	108.0	1, 2, 3	1,106	30%

6. Table 5.4. 2042 Build Alternative 2 Operations (Page 5-9) – This table identifies the delay (seconds) and Level of Service (LOS) for Alternative 2. The traffic impacts of Alternative 3 (Staff Preferred Alternative) "would be equal to or less than those at the same facilities for Alternative 2" (page 5-16, Section 5.1.4, Alternative 3: Slauson/A (Blue) Line to Pioneer Station). The impacts for the City of Bell (page 5-12) are shown: CC-11-13

No	Intersection Name	Jurisdiction	No Build Peak Hour Delay/LOS[a]	Alternative 2 Peak Hour Delay/LOS[b]
48	Gage Ave/California Ave	Bell	20/B-AM 98/F-PM	69/E-AM 120/F-PM
49	Gage Ave/Salt Lake Ave (West)	Bell	16/B-AM 34/C-PM	64/E-AM 114/F-PM
50	Bell Ave/California Ave	Bell? ntington Park	12/B-AM 9/A-PM	13/B-AM 8/A-PM
51	Bell Ave/Bissell St	Bell	5/A-AM 6/A-PM	13/B-AM 22/C-PM
52	Bell Ave/Salt Lake Ave	Bell? ntington Park	89/F-AM 88/F-PM	53/D-AM 19/B-PM

This Table indicates that 3 intersections in the City of Bell will be significantly impacted by the WSAB project. The delay at these intersections increases to unacceptable levels.

As previously stated, there are no analysis sheets provided that detail the HCM/Synchro model analysis of the study intersections. We are unable to determine if the analysis methodology and inputs are appropriate. Provide all Synchro analysis sheets, including the Synchro input files, for the City's review.

CC-11-13

7. Table 5.5. 2042 Build Alternative 2 95th Percentile Queues from Upstream Crossing to Intersection (Page 5-14) – This table indicates queue lengths can be accommodated at locations within the City.

CC-11-14

Crossing[a,b]	Intersection to the North/East of Train Crossing	Distance from Intersection Back to Rail Crossing (feet)	Build Alternatives 95th Percentile Queue[c] (feet)	Intersection to the South/West of Train Crossing	Distance from Intersection Back to Rail Crossing (feet)	Build Alternatives 95th Percentile Queue[c] (feet)
Bell	Bell Ave/ California Ave	350	81	Bell Ave/ Salt Lake Ave	Intersection operations coordinated with the adjacent crossing	
Gage	Gage Ave/ California Ave	435	421	Gage Ave/ Salt Lake Ave (West)[d]	Intersection operations coordinated with the adjacent crossing	

How does footnote "d" apply to the Gage Ave/Salt Lake Ave (West) intersection? Will the westbound queue on Gage Ave block access to the intersection of Gage Ave/Lucille Ave? If so, what mitigation measures will be implemented to address this blockage? CC-11-14

The analysis of Gage Ave/California Ave indicates the queue would not impact the intersection. However, the 14-foot difference (435-421=14) is essentially a single vehicle. Based on the Synchro simulation model, vehicles are generated randomly thus queue lengths could vary. With only a single vehicle difference, there should be some mitigation measure provided at Gage Ave/California Ave to address queue impacts. CC-11-15

Bell Ave/California Ave and Bell Ave/Salt Lake Ave are both all-way Stop controlled intersections. How will "Intersection operations coordinated with adjacent crossing" be accomplished? Based on the physical distance of Bell Ave/Salt Lake Ave to the Rail Crossing, the Bell Ave/Salt Lake Ave intersection should become a fully signalized intersection with the Rail Crossing incorporated into the intersection. CC-11-16

Due to the Bell Ave/Salt Lake Ave intersection located directly adjacent to the Rail Crossing, a queue analysis should be conducted for the Bell Ave/Bissell St intersection. Will the queue impact Bell Ave/Bissell St? CC-11-17

8. Table 5.7. Alternative 3 Intersection Adverse Effects Assessment (Page 5-18) – This Table identifies the 3 intersections in the City that are impacted by the WSAB project: 48-Gage Ave/California Ave; 49-Gage Ave/Salt Lake Ave (West); and 51-Bell Ave/Bissell St. The impacts are primarily a result of the nearby at-grade crossings. CC-11-18

Intersections with Adverse Effects
No. 48: Gage Ave/California Ave
No. 49: Gage Ave/Salt Lake Ave (West)
No. 51: Bell Ave/Bissell St

9. Table 5.53. On-Street Parking Impacts (Page 5-63) – This Table summarizes the on-street parking impacts of each Alternative. The Florence/Salt Lake Station identifies Alternatives 1, 2, and 3 would have no impact ("No change") to on-street parking in the City of Bell. CC-11-19

Location	Jurisdiction	Existing On-Street Parking Spaces	Observed Field Utilization[a]	Parking Spaces Added/ Removed[b]	Alternative(s) Affected	Description of Effect
Florence/Salt Lake Station	Huntington Park	1,106	30%	0	1, 2, 3	No change.

It should be noted that on-street parking is generally in high demand in residential neighborhoods throughout the City. The proposed mitigation measures (TRA-21: Parking Monitoring and Community Outreach, and TRA-22: Parking Mitigation Program (Permanent)) may be helpful but even the Report states (Page 5-62) "it is possible that adverse effects would remain after mitigation." It is important that the WASB project address the loss of any on-street parking to the satisfaction of the City and its residents. CC-11-19

10. Table 5.54. Off-Street Parking Impacts (Page 5-65) – The off-street parking impacts are adjacent to the City of Bell but primarily in Huntington Park. CC-11-20

Location	Jurisdiction	Project Element	Alternative(s) Affected	Number of Lost Spaces	Approximate % of Total Parking	Remaining Spaces Within Code Requirements?
Strip mall on the northeast corner of Walnut Street and California Avenue	Huntington Park	TPSS Site 13(E)	1, 2, 3	13	30%	yes

11. Spillover Parking Impacts (Page 5-68) – This section discusses the Florence/Salt Lake station in the following:

"On-street parking around the Pacific/Randolph, Florence/Salt Lake, and Gardendale Stations is largely time unlimited and was 60 percent or less utilized at the time of surveys. While it is not anticipated that transit passengers would access these stations via car because dedicated parking is not provided, on-street parking capacity is available to accommodate those who may try to do so without passengers displacing others using the spaces. Therefore, adverse effects from spillover parking would not occur." CC-11-21

The City disagrees with this statement. As stated previously, on-street parking in the City of Bell is in high demand especially in residential neighborhoods. Without dedicated parking for the Florence/Salt Lake Station, some rail passengers will be seeking parking in the surrounding neighborhoods. The proposed mitigation measures (TRA-21: Parking Monitoring and Community Outreach, and TRA-22: Parking Mitigation Program (Permanent)) must be applied to the Florence/Salt Lake Station especially with no on-site parking proposed. It is important that the WASB project address the loss of any on-street parking to the satisfaction of the City and its residents.

12. Section 7.3.2.2 Traffic Operations Effects (Page 7-25) – The construction impacts to the City are not clearly identified. This section describes general impacts to traffic circulation. Mitigation measure TRA-20, Transportation Management Plan (TMP) "will address construction impacts on transportation facilities under the jurisdiction of all involved cities and agencies, including Caltrans." We are requesting the EIS/EIR and the Transportation Impact Report indicate the timing of construction for those project elements located in the City of Bell. CC-11-22

13. Intersections Nos. 49 and 48 (Page 8-12) – This title should be corrected to "Nos. 48 and 49".

Table 8.4. 2042 Operations Without Mitigation Intersections Nos. 6 and 7 (Page 8-12) – This Table is incorrectly titled. This should be for "Nos. 48 and 49". Intersections Nos. 48 and 49 are identified as having "Adverse Effects" with the Build Alternatives. CC-11-23

Table 8.4. 2042 Operations Without Mitigation Intersection Nos. 6 and 7

No	Intersection	Peak	No Build (Delay in Sec/LOS)	Build Alternatives	Without Mitigation (Delay in Sec/LOS)	Adverse Effect?
48	Gage Avenue/ California Avenue	AM	16.3/B	1, 2, 3, Design Options 1 and 2	64.9/E	Yes
		PM	34.2/C	1, 2, 3, Design Options 1 and 2	114.4/F	Yes
49	Gage Avenue/ Salt Lake Avenue (West)	AM	16.3/B	1, 2, 3, Design Options 1 and 2	64.9/E	Yes
		PM	34.2/C	1, 2, 3, Design Options 1 and 2	114.4/F	Yes

Source: Compiled by Jacobs in 2020
Notes: The highlighted cells in red with bold "Yes" text indicate there would be adverse effects at the intersection.
AM = morning; LOS = level-of-service; PM = afternoon; Sec = seconds

The Report indicates that some preliminary mitigation measures would not be feasible due to the need to acquire several properties on Gage Avenue. The acquisitions include retail buildings, residential buildings, parking, and landscaping along both sides of Gage Avenue from west of Salt Lake Avenue to east of California Avenue.

Revised mitigation measures were applied to these 2 intersections and resulted in Table 8.6. Mitigation Measures for Intersections Nos. 48 and 49 (Page 8-14) and Figure 8-4. Intersection Nos. 48 and 49 Lane Configuration with Mitigation Measures (Page 8-15).

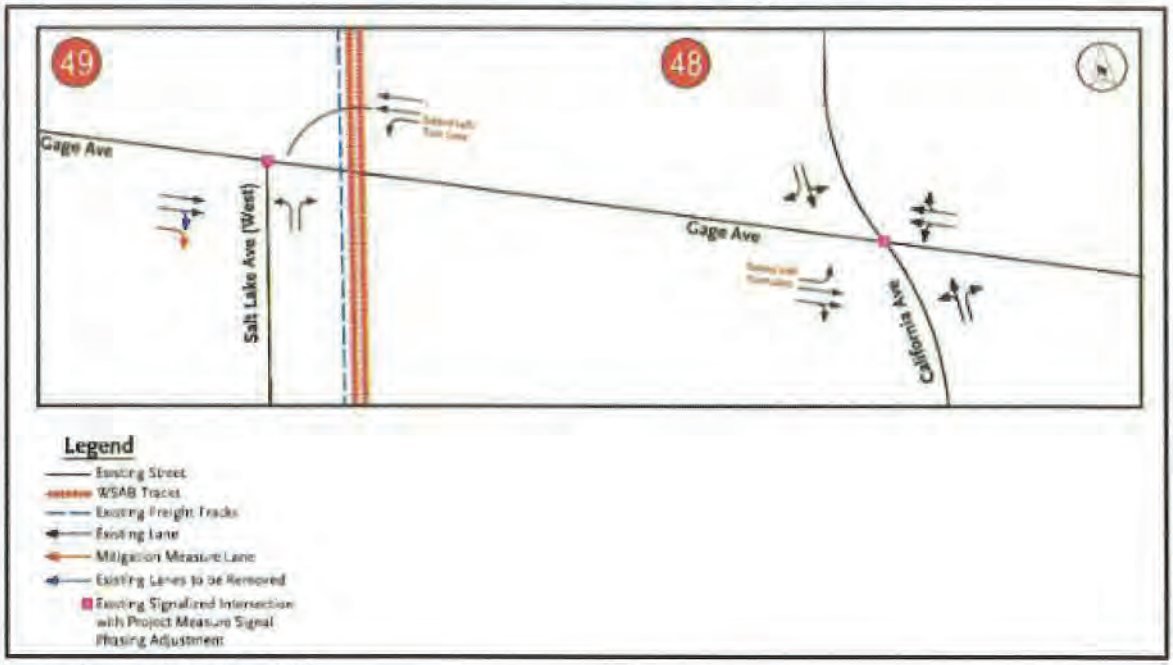
CC-11-23

Table 8.6. Mitigation Measures for Intersection Nos. 48 and 49

No	Intersection	Mitigation Description	Peak	No Build Delay/LOS	Build Alternatives	Without Mitigation (Delay in Sec/LOS)	With Mitigation (Delay in Sec/LOS)	Adverse Effect With Mitigation?
48	Gage Avenue/ California Avenue	TRA-4: Extend eastbound left-turn lane with a 150-foot turn bay. Metro would implement this measure subject to approval of the applicable jurisdiction (City of Bell).	AM	19.6/B	1, 2, 3, Design Options 1 and 2	69.4/E	63.1/E	Yes
			PM	97.5/F	1, 2, 3, Design Options 1 and 2	120.3/F	123.2/F	Yes
49	Gage Avenue/ Salt Lake Avenue (West)	TRA-3: Add eastbound right-turn lane with a 250-foot turn bay. Extend westbound left-turn lane with a 225-foot turn bay. Metro would implement this measure subject to approval of the applicable jurisdiction (City of Bell).	AM	16.3/B	1, 2, 3, Design Options 1 and 2	64.9/E	33.8/C	Yes
			PM	34.2/C	1, 2, 3, Design Options 1 and 2	114.4/F	100.9/F	Yes

Source: Compiled by Jacobs in 2020
Notes: The highlighted cells in red with bold "Yes" text indicate that adverse effects would still occur at the intersection after implementation of mitigation.
AM = morning; LOS = level-of-service; PM = afternoon; Sec = seconds

Figure 8-4. Intersection Nos. 48 and 49 Lane Configuration with Mitigation Measures



Source: Prepared by Jacobs in 2020

These mitigation measures reduce the delay experienced at the intersections. However, adverse effects of the WSAB project will remain after mitigation. The City of Bell is not satisfied with this conclusion. What improvements, if any, could be gained with the use of pre-signals or queue-cutter signals? As traffic signal timing was optimized for the analysis, what exactly does that entail? The need to see the actual Synchro detail sheets would help answer this question. Was any coordination of adjacent signals considered as mitigation?

CC-11-24

Intersection No. 48 proposes the extension of the eastbound left turn lane to 150 feet. This extension will impact the westbound left turn storage length of Gage Ave at Lucille Ave. Analysis of the intersection of Gage Ave and Lucille Ave should be included in the design of the eastbound left turn storage length of Gage Ave/California Ave

Intersection No. 49 proposes the extension of the westbound left turn lane to 225 feet. This extension may impact access to adjacent retail properties.

14. Intersection No. 51 (Page 8-15)

Intersection No. 51 experiences "Adverse Effects" during the PM peak with the Build Alternatives. Table 8.8. Mitigation Measures for Intersection No. 51 (Page 8-16) and Figure 8-6. Intersection No. 51 Lane Configuration with Mitigation Measures identifies the improvements with mitigation measures.

CC-11-25

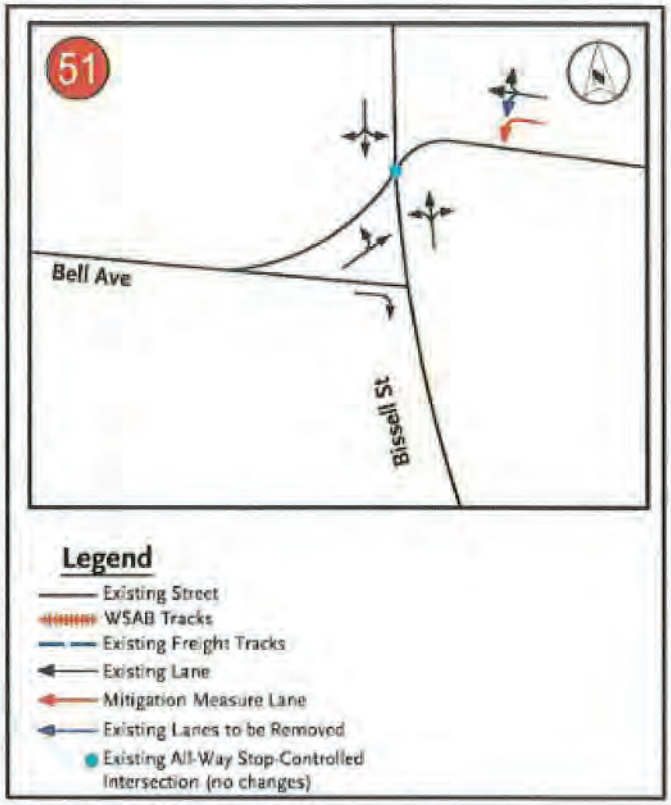
Table 8.8. Mitigation Measures for Intersection No. 51

No	Intersection	Mitigation Description	Peak	No Build Delay/ LOS	Build Alternatives	Without Mitigation (Delay in Sec/LOS)	With Mitigation (Delay in Sec/LOS)	Adverse Effect With Mitigation?
51	Bell Avenue/ Bissell Street	TRA-2: Add a westbound through-right lane. Convert westbound left-through-right lane into a left-turn lane. Metro would implement this measure subject to approval of the applicable jurisdiction (City of Bell).	AM	5.3/A	1, 2, 3, Design Options 1 and 2	13.9/B	6.8/A	No
			PM	5.7/A	1, 2, 3, Design Options 1 and 2	22.5/C	9.6/A	No

Source: Compiled by Jacobs in 2020
Notes: The highlighted green cells with "No" text indicate there would not be an adverse effect after mitigation.
AM = morning; LOS = level-of-service; PM = afternoon; Sec = seconds

15. Intersection No. 50 (not included in the Mitigation Measures section). The intersection of Bell Ave/California Ave is currently all-way Stop controlled. This intersection should include the installation of a traffic signal as a mitigation measure. Based on the physical distance of Bell Ave/Salt Lake Ave to the Rail Crossing, the Bell Ave/Salt Lake Ave intersection should become a fully signalized intersection with the Rail Crossing incorporated into the intersection. CC-11-26

Figure 8-6. Intersection No. 51 Lane Configuration with Mitigation Measures



Source: Prepared by Jacobs in 2020

Alternatives Considered/Project Description

Page 2-15, Figure 2-2 – the City appreciates the inclusion of High-Speed Rail from Burbank Airport to Union Station and the Link Union Station Project. Is the LA Streetcar project included in the analysis? This could potentially connect Broadway, 7th/Metro and 7th/Alameda together and provide Downtown Los Angeles connectivity with a proposed Alternative 1 alignment to Union Station.

Transportation

Page 3-72 When was the parking study conducted? Parking analysis conducted as part of the Near-Term Scope and Metro TOD SIP seems to be missing.

CC-11-27

Page 3-78 The statement that there will be no parking spillover because no transit parking is provided does not make sense.

Page 3-105 Parking monitoring is not adequate. The parking monitoring system needs to be based upon a set of guiding principles agreed to by Metro and the local jurisdictions. It should be a comprehensive on and off-street parking analysis by block, station area and for the corridor. This allows use of parking resources at various stations to meet Metro parking demand. The monitoring system should be inclusive of all parking users and not focus only on Metro customers. It must include and yet not be limited to visitors, customers, employees, residents and Metro commuters. It must analyze and reduce potential parking spillover issues, especially in existing residential neighborhoods.

Affected Environment and Environmental Consequences

Page 4-11 – WSAB provides important access to jobs and institutional/public facilities, medical facilities and recreational uses.

Page 4-30 – Above grade alignment at certain locations could divide established communities. Some of the communities may prefer columns over berms and walls to reduce physical barriers.

Page 4-56 – Since 87 to 89 percent of the residents have lived in their homes for more than one year, they are living in stable, existing residential communities that will need to be protected from potential environmental consequences. This is particularly important as we address both parking spillover and cruising for parking in stable neighborhoods that can exacerbate already poor air quality and traffic conditions in the residential areas surrounding the WSAB stations.

Page 4-193 – Eco-Rapid Transit recommends the inclusion of local artists from the impacted communities. This can be done by working with the local jurisdictions in the community.

Page 4-232 – Alternative 1 reduces more GHG than other options because of its regional connectivity.

Page 4-510 – The City is impressed with Metro's ability to mitigate noise and integrate into the community at the existing Santa Monica Light Rail Maintenance Facility. A similar approach and design to the Santa Monica model is necessary for the selected WSAB Maintenance Facility. The same Maintenance facility construction and operations impacts exist here are they do in Santa Monica.

Page 4-525 to 4-535 – Access to parklands and recreational facilities are important in the WSAB corridor. Access to the Los Angeles River and River LA project is more than a bicycle facility. It is also an important future parkland, cultural center and recreational facility. CC-11-27

Page 4-559 – The local government agencies need revenue to support local services, like public safety, the cost of which will only increase for communities with stations. The impact of the 3% local share required by Metro puts an unfair burden on our environmental justice communities.

Page 4-565, Table 4.17.5 – It seems that the General Fund Revenues should be higher in Alternative 1 and 2 than in Alternative 3 and 4 because of the access to Downtown Los Angeles and other regional destinations.

Page 4-571 – Safety and security is important for the entire line. A successful safety and security program must be a partnership between Metro, local jurisdictions, businesses and residents. Additionally, local municipalities shall be entitled to ongoing Metro funding to offset the added cost of police services that will generated by the station areas. As with other explanation of mitigations, the study refers to a Metro policy (920-924), but does not explain the policy nor provide a link to find it.

Section 4(f) Evaluation

The opportunity to leave these publicly owned assets in a better condition than prior to project has been ignored. For example, Salt Lake Park is listed as a property in need of protection under Section 4(f) yet the environmental analysis for the site states that the site will be left with insufficient parking (less than prior to the project construction and operation). Salt Lake Park is a good example of how an identified protected property can be left in a condition that benefits from the project. Increasing the parking for the park while

providing new additional recreational facilities on top of the parking has not been evaluated. Such an improvement should be considered, analyzed and evaluated under this section.

Greater access to historic sites along the different alternatives has not been identified as possible greater benefit under Section 4(f). For example, easier accessibility to El Pueblo De Los Angeles State and Historic Monument from the Gateway Cities area could benefit the state park through increased revenues and donations resulting from greater awareness of the historic resource.

The analysis in Appendix BB is inadequate and the conclusions made in the DEIR/EIS as it relates to Section 4(f) are at best inaccurate and in many instances short sighted of the opportunities available to improve Section 4(f) properties.

\Evaluation of Alternatives

Page 6-2 – How does the short line in Alternative 2 impact ridership? How does it impact the ability to compare ridership on Alternative 1 versus Alternative 2? While it costs $100 million more as part of Alternative 2, how would it change ridership on Alternative 1?

Page 6-6 – The City of Bell believes that there should be greater economic and community benefits if the line goes to Downtown Los Angeles (Alternative 1 and 2) rather than stopping at Slauson (Alternative 3). Please explain your statement.

Page 6-13 – Does Metro have a more detailed explanation and a list of community groups opposed and those in favor of the Little Tokyo station? Eco-Rapid Transit has heard from a number of groups within Little Tokyo in support of the station.

Public Outreach, Agency Consultation and Coordination

Page 7-19 – City of Bell would like to see the Downtown Los Angeles survey, survey methodology and be provided more qualitative and quantitative analysis. An appropriate survey should include information related to population, sample size, sample design, data collection and potential sampling error. It should minimize sampling error and present data with a minimum of potential biases. CC-11-27

Areas of Concern

- **Safety and security** – The Safety and Security thresholds in the environmental document are not substantial enough (Section 4.1.1.1, pg. 4-3 table) - 100 feet is too little to adequately address safety concerns - 0.25 mile is 1,320 feet so 100 feet is barely over 0.01 mile.
- **Safety and security** – appears lacking during construction and in the station areas.
- **Land use** – It appears analysis checking for consistency with local plans looks primarily at general plans and bicycle plans but no CAPS or otherwise local master plans/development plans (Table 4.1.4)
- **Land use** – The alignment for Alternative 1 is no impact (pg. 4-17) making it an acceptable choice for the Locally Preferred Alternative (LPA)
- **Land use** – Parking for Alternative 1 presents no adverse (pgs. 4-17, 4-18) making it an acceptable choice for the Locally Preferred Alternative (LPA).
- **Land use** – In terms of station design, what will be the experience of the rider when they emerge from the station? (Was that experience analyzed for impacts?) (pg. 4-18)

- **Land use** - Street closures – (pg. 4-19) – document suggests no division to community and no affect because access is still possible despite permanent road closures – what would that actual affect be?
- **Land Use** – Barriers – What specific impacts to truck traffic for turning restrictions? Actual design of barriers – visual blockage? (pg. 4-19) – How will this be mitigated?
- **Land Use** – Pedestrian Bridges – (pgs. 4-19, 4-20) – demolishing an aerial bridge and replacing it with an underground tunnel might have safety and security impacts that need to be mitigated/avoided/minimized. Metro is responsible for the change, not the school district, so expenses incurred for an increased need in safety and security should be incurred by Metro as a proper mitigation.
- **Land Use** – Property acquisitions – why are there any partial property acquisitions? A property owner cannot be made whole when there is only a partial acquisition. (pg. 4-20)
- **Land Use – No conflicts with Alternative 1 – supports the case to be made for Alt. 1 to be LPA (including Design Option 1 – Little Tokyo station)**
- **Land use** – Potential in Alternative 1 to get mitigations to pay for bike plans for cities of Huntington Park, Cudahy, South Gate and Bell (pg. 4-22) – including this in the LPA and environmental analysis allows these cities increases in opportunities to secure funding for their bike plans, e.g., eligibility for infrastructure grants.
- **FUNDING (general comment)** – if Alternative 1 is not chosen as the LPA in the FEIR then the potential for additional funding may be decreased. If it is considered as a phased project, then the environmental analysis will already be certified and it makes the likelihood of future funding greater because it is closer to shovel ready and is an analysis that many disadvantaged cities do not have the resources to pay for on their own as an individual entity (look at GCCOG STP for possible funding sources). Further, many funding eligibility requirements include the requirement for a certified environmental review, not just inclusion in an environmental analysis document. CC-11-27
- **Land Use** – Bike Path conflicts – Cities of Cudahy, Huntington Park, South Gate, and Bell – possible bike path/plan conflicts with WSAB project (potential impact and mitigations are the same for Alternatives 1 and 3). Metro is interested in providing language to all cities to alter their existing bike plans so that there is no longer a conflict. The cities are under no obligation to do so. This is why there is a mitigation and why it is considered a potential significant impact without mitigation. This mitigation measure seems insufficient to mitigate the conflicts. Metro should be proposing (and analyzing in the FEIR) mitigations for each city that enables them to fulfill their bike plans. For example, they should be paying for designs and potentially actual bike path improvements for each of these cities. Another possibility is to assist cities with securing grants to make those bike path improvements that would then be consistent with the WSAB project. This can be done and should be legally required under CEQA/NEPA (and lack of making such mitigations has the potential to affect environmental justice issues since these communities have residents often dependent on bicycles).
- **Communities and Neighborhoods** – SCAG 2016-2040 RTP/SCS is the document used for thresholds and goals (pg. 4-35) – Did the smaller cities provide updated information to SCAG for this document? Is it accurate? It is not uncommon for smaller staffs to rely on larger entities to update information even if it is not the most up to date information. If it is not the most accurate data, Metro should ask cities to provide the most up-to-date accurate information to be plugged into the analysis so that proposed mitigations address the most pertinent impacts.

- **Communities and Neighborhoods** – (pg. 4-35, maps pg. 4-37) Do any of the stations pose a problem in cities based on access and mobility? Does the station reinforce community character and cohesion and how was this analyzed in the environmental document? Was community stability on a station by station analyzed? Access and mobility can mean parking provision, at grade crossings, turning restrictions, street closures and vehicle delay at intersections. Was analysis of this conducted for all traffic such as truck traffic and increased passenger traffic traveling to station parking areas?
- **Acquisitions and Displacements** – (pg. 4-63) - Does Metro have an officially adopted internal acquisition and relocation policy? If so, what is it? It isn't sufficient to quote the law. There needs to be clear details on the process. For example, in relocation, how is FF&E handled, moving logistics as well as moving expenses, comparable location not just comparable compensation, etc.
- **Acquisitions and Displacements** – (pg. 4-64) - Section 4.3.1.2 states "The purchase of an easement is accomplished through a one-time payment and an easement deed is recorded" This does not speak to how the easement will be maintained. Further, earlier in this section it is noted that there may be temporary easements. In Metro public presentations, the example of a soundwall as a temporary easement where the soundwall was constructed on private property under a temporary easement and once constructed the "property" was returned to the property owner. There is not discussion about maintenance or the type of long-term impact this may have on a property. To state that the property is still "economically viable" could mean it's worth more than zero but does not acknowledge the loss of property value due to the improvements introduced by Metro. CC-11-27
- **Acquisitions and Displacements** – (pg. 4-65) - The paragraph that began in the page prior states that in order to satisfy NEPA property displacements were evaluated to determine if the use was no longer possible after project implementation. It does not speak to the lasting effect on that particular use. An example, a residence may still be feasible for residential uses and purposes but if the outdoor recreational space is compromised then the quality of the residential space is compromised. The quality of life or quality of land use performance and how it is affected (not whether it is simply possible or not) needs to be analyzed and compensation and/or relocation needs to be determined based on the totality of the effect on not just the use but the overall quality of life or use itself.
- **Acquisitions and Displacements** – (pg. 4-66) - Why isn't there a table showing construction impacts on acquisitions and relocations, why are only permanent property acquisitions represented? Without a synthesis of the construction impacts on acquisitions and relocations, it is more difficult to analyze the impacts of acquisitions and relocations during the time of construction which is likely to last years.
- **Acquisitions and Displacements** – (pgs. 4.13 - 4.29) - Any acquisition that is not specifically for realignment, rail, or a station should be analyzed for the potential to later be used (even if shared) for housing, recreation (active and/or passive), economic development, and parking replacement.
- **Acquisitions and Displacements** – (pgs. 4-30, 4-31, 4-37) - Tables 4.3.3 and 4.3.4 only represent the permanently displaced based on aerial structures, stations, TPSS sites, and grade crossings. There needs to be analysis on how many businesses (and employees) are likely to experience business interruptions during construction. Also, a table illustrating this analysis of business interruption needs to be introduced by alternative alongside the previously mentioned table.
- **Acquisitions and Displacements** – (pgs. 4-38, 4-40) - 188 partial acquisitions (Table 4.3.1) for Staff Preferred Alternative 3. This far exceeds Alternative 1 with only 20 partial acquisitions. This is a

great difference when it comes to construction interruption of residents lives and permanent changes to residential property.

- **Acquisitions and Displacements** – (pg. 4-42) - Phasing acquisition of a single site only helps Metro with relocation activities and does not reflect the complete scale of the business disruption created for those properties with special location considerations. This is not a sufficient mitigation for the difficulty created by having special replacement needs. Consultation with the cities and property owners, with binding mitigation, would allow the property/business owners to determine what best meets the needs of their business(es).
- **Acquisitions and Displacements** – (pg. 4-43) - Displacement of businesses resulting in some permanent job losses by employees needs to be better mitigated by Metro. Offering to "coordinate with the appropriate jurisdictions regarding business relocation" does not guarantee job placement for employees with job losses. Job losses due to the project must be replaced with a concrete strategy articulated by Metro in the environmental document in order to illustrate that the problem created is completely addressed.
- **Acquisitions and Displacements** – (pg. 4-46) - Having a MSF located directly adjacent to residents places noise, vibration, aesthetic, and potential air quality impacts on residents, many of whom may be considered sensitive receptors depending on health considerations and age. A landscaped and/or other aesthetically pleasing noise and air quality buffer between the MSF and residential uses must be present to offset these potential impacts.
- **Visual and Aesthetics** – (pg. 4-48) - Viewer sensitivity is a subjective threshold and is insufficient in determining the full extent of whether or not a visual or aesthetic impact is potentially created. Adhering to a similar scale, mass, form and lighting level does not address aesthetic degradation of a site when changes are made by the project. Also, compatibility with the visual character of a highly urbanized area is further inadequate in determining a potential significant impact in the area of visual and aesthetics. For example, the introduction of an aerial alignment rail may be considered compatible in visual character to an urbanized area but to a residential property owner who once had a view of the open sky and now directly faces a concrete railway, a dramatic impact is created. Treatment to railways visible to any residential property should be included as aesthetic mitigations. Strategic landscaping to preserve privacy for businesses and residents should be included as aesthetic mitigations. Landscaping stations and striving to make those stations aesthetically pleasing is a start in mitigation but is not sufficient in totality of mitigating visual and aesthetic impacts along the line in its entirety. CC-11-27
- **Visual and Aesthetics** – (pg. 4-52) - Section 4.4.2.3 Visual Character and Quality lists the categories analyzed and taken into consideration for each district. Suburban Residential Landscape Unit, and suburban Residential Units are mentioned in this section. However, when analyzing Figure 4.4-1, these categories are not included and are only included in 3 segments of Figure 4.4-2. Huntington Park, Bell, Cudahy, South Gate, Paramount, Bellflower, Artesia and Cerritos, as well as adjacent cities, should all be considered under the Suburban Residential Landscape Unit as the properties within less than a mile from the line are all part of a suburban development, often largely residential, that happens to have high density. The higher density of the population does not and should not negate the suburban development and character of these cities along the project line.
- **Visual and Aesthetics** – (pgs. 4-53 – 4-57) - Table 4.4.2 often characterizes the visual quality of the area as "inharmonious, disorderly, and incoherent." These are often the mix of land uses, and the character areas in environmental justice communities are described. Metro should not discount the need for visual and aesthetic mitigations along the entire line because of its

determination of the visual quality of such an area. Landscape buffers and visual treatments should be incorporated into the entire design and elements of the project, such as berms, columns, rail, and other planned improvements, to address the aesthetic impacts created by the project and improve the visual quality of the area, not simply replace like for like aesthetics, especially in environmental justice communities.

- **Visual and Aesthetics** – (pg. 4-57 – 4-185) – Cities should be empowered by Metro to weigh in on how they want individual station treatments to be handled as mitigations in visual and aesthetic impacts.
- **Visual and Aesthetics** – (pg. 4-189) - Lighting located in a manner to protect businesses and residents from glare is essential in aesthetics mitigation. However, the level of lighting and placement of lighting must also reflect the safety and security needs along the alignment and station areas and transitions to station areas. Not introducing a lighting source in an area to avoid an aesthetic impact may create a safety and/or security hazard. For example, if a column is placed along the alignment but no lighting is placed underneath it so as to avoid an additional light source creating an aesthetic impact, that darkened portion of the property may become a problem both for keeping pedestrians off the alignment or for security of individuals who could then be subject to crimes. Studies indicate that lower levels of lighting are more often greater areas of crime. Therefore, Metro should consider placing new sources of lighting in areas that could pose potential crime or safety issues and mitigate the aesthetic impact through placement and direction of the lighting itself. Thus, both sets of impacts are mitigated. CC-11-27
- **Visual and Aesthetics** – (pg. 4-190) - Wayfinding signage needs to be included in the development of any design standards used for the project and incorporated into all station areas with content directed by local municipalities and business owners (VA PM-1); If consistency with MRDC and Systemwide Station Design Standards do not include landscaping along the route itself, then this mitigation is inadequate. There must be treatments; Landscaping at the Bellflower MSF Site Option needs to augment existing landscaping at a minimum, as mitigation because the existing landscaping buffer is for a much less intense land use on the site (VA PM-5); Adhering to local zoning is not sufficient as an aesthetic mitigation, improvements should be subject to design review for affected local municipalities (VA PM-6); and Lighting should not be avoided as new sources but should be located and directed in a manner that is both aesthetically pleasing as determined by local entities and provides safety and security in darkened areas along the project (VA PM-7).
- **Visual and Aesthetics** – (pg. 4-191) - Views of historic and cultural resources should be considered and analyzed as scenic vistas along the corridor.
- **Visual and Aesthetics** – (pg. 4-192) - The CEQA requirement for determining if the Project would degrade the existing visual character or quality of the site and its surroundings does not qualify whether or not the Project is in an urbanized area (Checklist in Appendix G). To create a double standard for degradation of the site and its surroundings is to ignore potential Aesthetic impacts created by the project. It is not enough to avoid conflicts with applicable zoning and other regulations. This is addressed in analysis of Land Uses. The impact on the scenic quality of a site and/or its surroundings must meet a higher standard. One recommendation is to create a design review committee (using the Public Art policy Metro already employs, as a model) made up of local stakeholders to review potential aesthetic treatments wherever there is an aerial alignment, views from residences, station wayfinding signage, and view corridors to cultural and historic

properties. The treatments agreed upon by such a committee should be binding. This is one possible mitigation strategy Metro can employ.

- **Visual and Aesthetics** – (pgs. 4-193 – 4-196) - Visual and aesthetic impacts must be analyzed for the entire route, not just the station areas and/or areas called out by Metro. Any time the line is visible, a screening mitigation, special treatment, or potential visible impact to be mitigated needs to be considered.
- **Visual and Aesthetics / Safety and Security** – (pg. 4-197) - Providing lighting only within the areas of the MSF may avoid potential source of glare issues but it might also create new safety and security impacts. The mitigation of aesthetics should not create impacts in the areas of safety or security. Both must be analyzed together.
- **Visual and Aesthetics** – (pg. 4-198) - Does the project as proposed meet SCAQMD standards? (Even when cumulative impacts and existing conditions are taken into consideration?) Because if not, the project will be unable to secure federal (possibly state/local) funding for the project and that is contrary to the project goals. Do they meet the regional significance thresholds (need mitigation to meet)? Additionally, a threshold for establishing potential significant impacts on odors needs to be established. One possible threshold Metro could use to mitigate odor impacts could be to provide a reporting mechanism by which if an odor source with five (5) or more confirmed complaints in the new source area over the period of one year is considered to have a significant impact on receptors and must be mitigated through odor elimination monitoring and established strategies of odor elimination.
- **Air Quality** – (pg. 4-226) - Alternative 1, Option 2 would reduce daily VMT by 218,500. Design Option 2 would decrease road dust emissions in direct correlation with VMT, impacts related to operational odors and dust would be less than significant and mitigation would not be required (not sure how odor impacts are less than significant when no odor threshold is being used). The significant VMT reduction should be taken into account when deciding upon the LPA since it has a great air quality impact advantage over the Staff Preferred Alternative 3. CC-11-27
- **Greenhouse Gases** – (pg. 4-227) - The DEIS/EIR states that Metro has developed policies toward controlling GHG emissions but does not specifically state it will adhere to the policies that have been developed (adopted was not the work used which may imply these are considerations only and not adopted actions).
- **Greenhouse Gases / Air Quality** – (pg. 4-228) - The study area for GHGs is six counties under SCAG jurisdiction. This would seem to dilute any meaningful analysis of GHG impacts created specifically by the project. Further, there seems to be an emphasis on substantially reducing VMTs in order to address GHG emissions yet the Staff Preferred Alternative 3 has greater VMTs then Alternative 1, Option 2 which would make Alternative 1, Option 2 more advantageous as the Locally Preferred Alternative (LPA) as it pertains to GHGs (and air quality).
- **Greenhouse Gases** – (pg. 4-230) - If automobile exhaust is a majority contributor to GHG emissions then what role does truck traffic play?
- **Greenhouse Gases** – (pg. 4-235) - The DEIS/EIR states that "Although SCAQMD has regulatory role in the South Coast Air Basin, it has not adopted or proposed any quantitative thresholds that would be applicable to the proposed LRT corridor" yet projects that do not adhere to SCAQMD thresholds may not be eligible for future funding. So, it would appear that the SCAQMD quantitative thresholds are very applicable to the LRT corridor if Metro has any interest in securing future funding.

- **Greenhouse Gases** – (pg. 4-236) - Analysis of Alternative 1 states the alternative would generate direct GHG emissions through operations at the MSF and indirect GHG emissions through energy use (for operations). However, the analysis of Alternative 3 (the Staff Preferred Alternative) states there is no direct source of emissions because it excludes the MSF. The inclusion of the MSF in analysis for Alternative 1 and exclusion of the MSF for Alternative 3 not only appears arbitrary and unscientific in approach but actually skews the claim of the analysis supporting Alternative 3 when there appears to be no material difference between direct emission sources. This discrepancy needs to be addressed where the same application applies to both alternatives.
- **Greenhouse Gases** – (pg. 4-240) - Where does the definition put forth that "noise is generally defined as unwanted sound" come from? What is the source material or threshold? Further, the human body may be susceptible to noise frequencies the human ear cannot detect. The assertion that there is no physiological impact because the human ear may not be sensitive to a frequency may be an error and should be analyzed in the document. Also, vibration is more than just sound waves.
- **Noise and Vibrations** – (pg. 4-243) - Table 4.7.1 Levels of Impact analyzes impacts based only on community annoyance. There is no analysis here reflecting impacts on human health as it pertains to noise and vibration nor upon businesses (such as sound studios) which may be impacted in a manner that has nothing to do with community annoyance and more specifically in business interruption or compromise.
- **Noise and Vibrations** – (pg. 4-244) - Clearly the FTA Transit Noise and Vibration Impact Assessment Manual is being used as a threshold due to the partnership between Metro and FTA on the environmental document. However, is this a threshold that is used in environmental analysis for any projects outside of FTA's influence? What threshold is most frequently used to determine noise and vibration impacts as it pertains to CEQA and NEPA. It is unlike that the FTA threshold is an industry standard. Perhaps a more neutral threshold that is considered across a wide range of transportation projects should be used in the analysis of impacts as it pertains to noise and vibration. CC-11-27
- **Noise and Vibrations** – (pg. 4-246) - Again, the FTA guidance document does not appear to be a strong enough threshold to determine true vibration impacts.
- **Noise and Vibrations** – (pg. 4-248) - The document states that existing noise levels were identified at sensitive land uses. However, there appear to be sensitive land uses that were not taken into account such as schools directly adjacent to the tracks. Metro should provide the inventory and clusters it used and identify which are sensitive land uses. And any sensitive uses, such as schools, churches that provide daycare services, and any other use of builds that may or may not be consistent with the land use designations along the line should be included and analyzed.
- **Noise and Vibrations** – (pg. 4-248 con't) - The document states "Ambient vibration levels were not measured as part of this study because the FTA vibration impact assessment is not based on the ambient levels but rather on the FTA Vibration Impact Criteria". Most CEQA and NEPA studies on vibrations include an inventory of ambient levels of noise and/or vibrations. Stating that the project is located in an urban center and implying that high levels of noise is a normal part of the urban environment therefore negating the need for quantified data on vibration is inadequate analysis of the existing conditions of noise and vibrations, the quantified increase to be expected, and how that increase in noise and vibration will be mitigated for both residents and workplaces.
- **Noise and Vibrations** – (pg. 4-312) - Section 4.7.5.1 begins with what appears to be a CEQA checklist question for noise levels but the end of the question has been altered to reflect ""in

excess of standards established by FTA or in the local general plans or noise ordinances" which is not from the CEQA checklist. The question to be addressed is if the project increases ambient noise levels period, not if it increases noise levels as determined by general plans, noise ordinances and the FTA. The analysis must include analyzing the increase in ambient noise and how it will be mitigated.

- **Noise and Vibrations** – (pg. 4-314) - There are no noise impacts anticipated from the parking facilities, none. This seems unrealistic. The operation of a parking lot should generate some noise that did not exist prior to the existence of the parking lot. This should be looked at realistically based on the operation of a parking lot, analyzed and mitigations for minimizing any noise generated from the parking facility should be included in the environmental document.
- **Noise and Vibrations** – (general comment) - There is reference in the Noise and Vibrations section to what counts as operational noise and it includes items such as special tracks, bells, MSF operation, but it does not specifically state noise generated from the tracks themselves (not under special circumstances, just the sound made from the tracks). If the cars chosen for the project are not steel wheels on steel tracks, then no real analysis of what noise is being generated by simple track use has been included in this analysis.
- **Geotechnical / Seismic** – (pg. 4-342) - The discussion in 4.9.2.4 should include discussion about water reclamation and how it might be captured.
- **Geotechnical / Seismic** – (pg. 4-344) - Since the proposed LRT alignment crosses at least one seismic fault, what measures is Metro taking to ensure that trains are not derailed in during a seismic event (for at-grade, aerial and underground)? CC-11-27
- **Geotechnical / Seismic** – (pg. 4-348) - When a detailed liquefaction evaluation is conducted, binding commitment to mitigate whatever is discovered out of that evaluation should be included in this environmental document.
- **Geotechnical / Seismic** – (pg. 4-376) - Truck routes with vehicles carrying hazardous materials that are altered due to the project (and street closures) must be analyzed to see if they increase the risk of accident (and accidental exposure) to sensitive receptors and hazardous materials in general.
- **Hazards** – (pg. 4-383) - The location and number of environmental concern sites should be used in the environmental justice analysis as justification for a larger EJ study area/corridor.
- **Hazards** – (pg. 4-386) - Groundwater contamination concerns should be reviewed to see if water reclamation could help address any impacts to groundwater potentially created by the project.
- **Hazards** – (pg. 4-395) - The risk of hazardous substance emissions is identical for both Alternative 1 and Alternative 3, no risk. So, choosing Alternative 1 as the LPA would have the same impacts as the Staff Preferred Alternative.
- **Hazards** – (pg. 4-405) - HAZ PM-2 Disposal of Groundwater (Operational) - some of the municipalities along the line have water reclamation already in place. This should be looked at and considered as part of an incorporated strategy to mitigate disposal of groundwater during operations.
- **Hazards** – (pg. 4-406) - Metro should consider (and analyze the potential for) funding to clean up contaminated soil in the project that does not require transportation money.
- **Water Resources** – (pg. 4-436) - Community stakeholders support a station located at the Rio Hondo crossing. Consideration of a possible future station at this location should be included in the analysis in this section.

- **Energy** – (pg. 4-451) - The use of low floor vehicles, charging at stations only, energy generating brakes, and under carriage charging, would enable trains to be powered by more sustainable energy sources, mitigate aesthetic impacts at stations (and along the route if canilaries were eliminated) and would reduce energy resource expenditures which is consistent with project financial goals.
- **Electromagnetic Fields** – (pg. 4-463) - Again, charging trains at stations would eliminate electromagnetic emissions along the route and help protect potential negative significant impacts on human health.
- **Parklands and Community Facilities** – (pg. 4-540) - Mitigation Measure LU-1 (Consistency with Bike Plans) is inadequate as a mitigation for impacts created on Bike Paths. Local entities and municipalities should not have to change their plans to match Metro. Metro should incorporate improvements and designs into the project that helps satisfy the adopted bike plans of the local municipalities. This would truly mitigate impacts and not just satisfy a law of compatibility.
- **Parklands and Community Facilities** – (pg. 4-550) - 4.16.5.2 There would be no danger of the increase and deterioration of existing recreational facilities if Metro were to provide additional recreational opportunities. Additional facilities on parking sites would be one option and is worth analyzing as a mitigation option.
- **Economic Fiscal Impacts** – (pg. 4-557) - A 0.25-mile and 0.50-mile area around the proposed station areas is insufficient as the area providing data for economic analysis. This limited geography is not a reliable way to analyze fiscal information and does not reflect the true economic conditions of the areas/cities affected by the project.
- **Economic Fiscal Impacts** – (pg. 4-559) - Revitalization of underutilized or vacant parcels, encouragement of new housing near transit center, supporting pedestrians and bike facilities, and preserving or expanding of open spaces and recreation that is referred to in the environmental document in order to be realized, must be included in the design, environmental considerations and analysis, and used to identify new funding sources that are not solely transportation funding in nature.
- **Economic Fiscal Impacts** – (pg. 4-561) - Direct local hiring to fill transit jobs and indirectly as transit workers spend their earnings can only be realized if Metro commits to these measures.
- **Economic Fiscal Impacts** – (pg. 4-563) - The beneficial impacts to the regional economy will only happen if Metro commits to actions that analyze TOD development, economic opportunities and employment support in this environmental document.
- **Economic Fiscal Impacts** – (pg. 4-564) - Business parking losses are expected. This is an impact that needs to be mitigated and is contrary to project goals. Additional parking, parking replacement spaces, and business retention and support strategies need to be analyzed and committed to in this environmental review.
- **Economic Fiscal Impacts** – (pg. 4-566) - Determining the magnitude of the business displacement impact by comparing the number of employees displaced to the total employment in the areas surrounding the proposed light rail line is an inadequate analysis of how businesses will be impacted by the project. Quantifying the number of businesses (and their employees) who will have their businesses and/or jobs eliminated needs to be included in the analysis.
- **Economic Fiscal Impacts** – (pg. 4-568) - If the MSF is offering new jobs, then language about local hires needs to be considered and committed to in the environmental document.

CC-11-27

- **Economic Fiscal Impacts** –(pg.4-631)- Impacts to businesses during construction are more significant than can be addressed by the Community Outreach Plan. There is no discussion of developing programs that meet the businesses needs or mitigate losses after meeting with the owners. More is needed than marketing.
- **Environmental Justice** – (pg. 4-853) - The threshold definition of an environmental justice community must include quantifications and impacts to the human health of residents and workers in the cities identified in the study corridor.
- **Environmental Justice** – (pg. 4-853 con't) - The cities of Maywood and Bell Gardens were not included in the Environmental Justice analysis and are not considered affected by the project. These cities were included in the Metro study corridor and need to be included in all aspects of environmental review and analysis including the category of Environmental Justice. Connections between these cities and stations in Huntington Park and Cudahy need to be analyzed and included in the design for the project.
- **Environmental Justice** – (pg. 4-854) - Environmental Justice communities are also those communities exposed to greater numbers/amounts of toxic industry than other communities. Exposure to this type of industry and human health risks in general must be made a greater part of the environmental justice analysis in the document.
- **Environmental Justice** – (pg. 4-873) - Permanent business displacement must be fully mitigated and not just financially compensated.
- **Environmental Justice** – (pg. 4-875) - Metro admits to unmitigated impacts in noise and vibration. These need to be fully mitigated.
- **Environmental Justice / Noise and Vibrations / Transportation / Air Quality** – (pg. 4-869) - Metro admits to unmitigated impacts, in addition to noise and vibration, in transportation and air quality. These need to be fully mitigated.

CC-11-27

The City of Bell thanks the efforts of Metro and its development team. The City is in support of the development of the West Santa Ana Branch light rail transit project with appropriate mitigations and with a preference that the light rail is from Artesia to Union Station alignment and a station in Little Tokyo (Alternative 1, Design Option 2). If you have any questions, you can contact our Community Development Director, Manuel Acosta at macosta@cityofbell.org.

CC-11-28

Sincerely,

Carlos Islas
Acting City Manager

City of Bell – CC-11

Comment ID	Response
CC-11-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-11-2	Comments are addressed individually by topic in the responses that follow.
CC-11-3	Table 5-2 and Table 5-4 in Section 5.1.2 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (previously Appendix D of the Draft EIS/EIR) have been updated to reflect that Intersections No. 50 and No. 52 are located within the City of Bell. Tables 3.10 and 3.12 in Chapter 3 of the Final EIS/EIR were also updated. These revisions do not affect the analysis or conclusions of the Draft EIS/EIR.
CC-11-4	Not all referenced documents are currently available online. Should a reviewing agency require additional supporting information for review, they may contact Metro to obtain copies of digitally available documents.
CC-11-5	The Synchro files have been added as an appendix to the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix A Attachment 8).
CC-11-6	Blank pages in the Final EIS/EIR have been updated to note "This page intentionally left blank." No change has been made to the Final EIS/EIR supporting documents.
CC-11-7	Table 5.10 in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (previously Appendix D to the Draft EIS/EIR) has been revised to note that the headways are shown in minutes.
CC-11-8	The reference to Figure 1-2 in Section 1.5.1 of the *West Santa Ana Branch Transit Corridor Project Transportation Impact Analysis Report* (Appendix D to the Draft EIS/EIR) is correct. The figure includes a photograph of current conditions at the existing Paramount Boulevard/Rosecrans Avenue crossing, which provides an example of one of the common configurations of at-grade crossings illustrated in Figure 1-1.
CC-11-9	Traffic analysis was conducted using Synchro and SimTraffic, the companion simulation tool. Section 1.6.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* has been updated to state that both tools were used. SimTraffic allows for the modeling of at-grade crossings, and implicitly considers the coordination effects of adjacent signals. It is a stochastic (random) process to simulate the vehicular traffic on the roads, and there are different results with each run. To account for the variations, five SimTraffic runs were conducted, and the average of the results was reported. The Synchro output files include details for the parameters used in the analysis. Synchro default values, which represent common practice, were used in some cases. Consistent values for these input parameters were used to allow for a consistent comparison between intersections in different jurisdictions and in future years where both field conditions and overall traffic conditions (e.g., improved vehicle technology) may change. Specific parameters were: ▪ Saturation flow rate: 1,900 vehicles/hour/lane ▪ Lane width: 12 feet ▪ Grade: 0% ▪ Storage length (for pockets): field-measured or from 10% engineering plans, from the end of the taper length (full width of pocket) to the limit line ▪ Link speed: coded directly based on field speed limit ▪ Peak hour factor: 0.92

Comment ID	Response
CC-11-10	Synchro and SimTraffic are both part of the same software package, but SimTraffic was specifically used to evaluate delay. The combined Synchro/SimTraffic package was used to evaluate the study intersections, using intersection geometry, traffic volumes, train schedules, and signal timing. Synchro was used to code the network (including basic details of geometry, volumes, and timing) but was not used to conduct level-of-service (LOS) analysis. The companion SimTraffic simulation tool was used to assess delay because SimTraffic considers the effects of the at-grade crossings and interactions between intersections (signal timing and queuing). SimTraffic is a stochastic (random) process for vehicular traffic on roads, and there are different results with each run. To account for the variations, five SimTraffic runs were conducted, and the average of the results was reported. Train schedules were coded into SimTraffic. To allow for a reasonable and accurate representation of the train crossing events for future train operations, a gate down event was coded at each train crossing location every 2.5 minutes. This approach represents a 5-minute headway for trains in both directions, consistent with the operating plan described in Chapter 2 of the Draft EIS/EIR. The SimTraffic model is stochastic (i.e., has random elements), so five separate simulation runs were conducted for each scenario, and the average of the five runs was used to report results. These procedures are consistent with standard professional practice. Similar analysis methodologies have been applied in Metro's most recent similar environmental study (Metro Gold Line Foothill Extension Phase 2B) and other transit projects.
CC-11-11	Figure 2-4 from the Draft EIS/EIR has been updated for the Final EIS/EIR to depict the Locally Preferred Alternative (LPA) and better distinguish at-grade from aerial segments. Please refer to Figure 2.3 in Chapter 2 of the Final EIS/EIR.
CC-11-12	The comment correctly summarizes information from the Draft EIS/EIR.
CC-11-13	Mitigation measures were considered for intersections where the Project will result in an adverse impact based on changes in LOS. Mitigation typically included signalizing intersections that were currently stop-controlled, adding lanes, and/or extending turn bays. If mitigation will result in secondary impacts (typically, acquisition of right-of-way), mitigation was not proposed. All feasible mitigation measures are described in Chapter 3, Section 3.5.2.1 of the Draft EIS/EIR. This section presents the mitigation deemed feasible in text, on figures, and in a table format. The table also presents the LOS with mitigation and identifies if adverse impacts will remain. Mitigation Measures TRA-2 (Bell Avenue/Bissell Street), TRA-3 (Gage Avenue/ Salt Lake Avenue (West)), and TRA-4 (Gage Avenue/ California Avenue) are proposed within the City of Bell. These measures are described in Tables 3.40 and 3.41 and are shown on Figures 3-11 and 3-12 in the Draft EIS/EIR. The text of the mitigation measures indicates they are subject to the approval of the City of Bell. See response to comment CC-11-5 regarding Synchro files.
CC-11-14	The footnote was a typographical error. The footnote was removed from the table for Gage Avenue/Salt Lake Avenue (West). The westbound vehicle queue from the Gage Avenue train crossing is not anticipated to extend to Gage Avenue/Lucille Avenue. Details are provided in Table 5.4 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D of the Draft EIS/EIR).
CC-11-15	The Draft EIS/EIR included Project Measure TR PM-1 (Pre-signals and Queue-cutter Signals). The project measure will be applied at locations where vehicle queuing is a concern and will discourage vehicles from queuing on railroad tracks. A pre-signal is proposed at the Gage Avenue at-grade crossing (see plan sheet CS-201 in Appendix B of the Final EIS/EIR).

Comment ID	Response
CC-11-16	With implementation of the Project, the Bell Avenue/Salt Lake Avenue intersection will become signalized and coordinated with the nearby Bell Avenue at-grade train crossing (see plan sheet CS-201 in Appendix B of the Final EIS/EIR). The traffic signal and rail crossing will communicate with interconnect cabling, a typical communication setup for a traffic signalized intersection adjacent to signalized train crossings.
CC-11-17	The eastbound vehicle queue from the Bell Avenue/Salt Lake Avenue intersection is not anticipated to extend to Bell Avenue/Bissell Street. Details are provided in Table 5.4 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D of the Draft EIS/EIR).
CC-11-18	See response to comment CC-11-13. Mitigation Measures TRA-2 (Bell Avenue/Bissell Street), TRA-3 (Gage Avenue/Salt Lake Avenue (West)), and TRA-4 (Gage Avenue/California Avenue) are identified for each of the three intersections cited in the comment. The mitigation measures will only be implemented subject to the approval of the applicable jurisdiction (City of Bell).
CC-11-19	On-street parking loss has not been identified within the City of Bell. As stated in Chapter 3, Section 3.4.4 of the Draft EIS/EIR, for Alternatives 1 and 2 it is possible that adverse effects would remain after mitigation because parking demand, the subsequent strategies that may be utilized with implementation of the mitigation measures, and the community response are unknown. Measure TRA-21 in the Draft EIS/EIR (now referred to as Mitigation Measure TRA-19 in the Final EIS/EIR) includes a variety of means to address spillover parking if it occurs. Metro will coordinate with the local jurisdiction if parking demand after the Project opens is at least 20% greater than pre-service demand. Mitigation Measure TRA-22 (Parking Mitigation Program [Permanent]), now referred to as Mitigation Measure TRA-20 in the Final EIS/EIR, will address the physical loss of public parking spaces resulting from implementation of the LPA. Consistent with the Draft EIS/EIR for Alternative 3, while adverse on-street parking or spillover parking effects are not anticipated for the LPA, Mitigation Measures TRA-19 and TRA-20 will be implemented.
CC-11-20	The comment correctly summarizes information from the Draft EIS/EIR.
CC-11-21	See response CR-TRA-1 regarding the spillover parking analysis, which has been updated in the Final EIS/EIR to no longer rely on available on-street parking where the demand for transit parking is forecasted to exceed supply. Removing the availability of on-street parking as a consideration for transit parking provides a more conservative approach to the analysis of potential impacts related to spillover parking at the stations because it does not assume that demand could be met by using on-street parking, if available. Parking demand from the Metro Travel Demand Model was also updated in Chapter 3, Section 3.4.4.2 of the Final EIS/EIR to include all nine stations along the LPA, in addition to the forecasted demand restricted to the five stations with transit parking in the Draft EIS/EIR. The analysis was also updated to represent the corridor-wide transit parking demand. As stated in this section, adverse effects related to spillover parking are not expected. Consistent with the Draft EIS/EIR for Alternative 3, while adverse spillover parking effects are not anticipated for the LPA, Mitigation Measure TRA-19 (Parking Monitoring and Community Outreach) will be implemented.

Comment ID	Response
CC-11-22	Updated information on construction timeframes is included in the Final EIS/EIR (Chapter 4, Section 4.19 and Chapter 3, Section 3.7). specific construction timing for the LPA has not yet been defined, as different construction approaches are currently under consideration and will ultimately be determined once a contractor is selected. A construction plan will be developed during the final design phase of the Project to further detail the construction durations, schedule, and sequencing. General construction durations are provided for specific project elements (e.g., demolition, utility relocation, and at-grade guideway) in Table 4.1 of the *West Santa Ana Branch Transit Corridor Project Construction Methods Impact Report* (previously Appendix L to the Draft EIS/EIR). Transportation Management Plans (TMPs) are a proven strategy for minimizing potential transportation impacts during construction. Pursuant to Mitigation Measure TRA-18 (Transportation Management Plan(s)) (identified as Mitigation Measure TRA-20 in the Draft EIS/EIR), the development of the TMPs would be coordinated by Metro with the local jurisdictions.
CC-11-23	The titles of the tables have been corrected. Refer to Tables 8.4 and 8.5 in the updated *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report.*
CC-11-24	The pre-signals or queue-cutter signals are identified in the Draft EIS/EIR as TR PM-1 (Pre-signals and Queue-cutter Signals) and will be implemented to discourage vehicles from stopping or queueing on the tracks. The pre-signal is shown on plan sheet CS-201 in Appendix B of the Final EIS/EIR for intersection No. 49 (Gage Avenue/Salt Lake Avenue). Traffic signal timing and the design of mitigation measures will be advanced based on field conditions during later stages of design. Intersections adjacent to those where mitigation is proposed will be reflected on plans as applicable depending on the limits of the mitigation design. The traffic signals and rail crossing will communicate with interconnect cabling, a typical communication setup for a traffic signalized intersection adjacent to signalized train crossings. Metro will coordinate with city staff per executed Master Cooperative Agreements. The Master Cooperative Agreements provide cities the opportunity to review design packages and provide comments. Mitigation measures are identified for the two intersections noted in the comment. See response to comment CC-11-18.
CC-11-25	Mitigation Measure TRA-2 (Bell Avenue/Bissell Street) was identified to address adverse impacts at intersection No. 51. With the implementation of the mitigation measure, adverse impacts are not anticipated, as shown in Chapter 3, Table 3.41 of the Draft EIS/EIR and Chapter 3, Table 3.24 of the Final EIS/EIR.
CC-11-26	The traffic operations analysis evaluated the Bell Avenue/California Avenue intersection. As shown in Table 3.14 in Chapter 3 of the Draft EIS/EIR, the Project will not result in adverse impacts at this intersection. Therefore, mitigation is not required. The Bell Avenue/Salt Lake Avenue intersection will be signalized and coordinated with the nearby Bell Avenue at-grade train crossing. The proposed signal is shown on plan sheet CS-201 in Appendix B of the Final EIS/EIR for intersection No. 51 (Bell/Salt Lake).
CC-11-27	See responses to comments JPA-1-45, 46, 49, 52, 65, 74, 98, 106, 130, 131, 137, 142, 145, 156-161, 164, 50, 51, 55-62, 167, 168, 133, 68, 69, 83-86, 53, 66, 70, 75-78, 80-82, 93-96, 98-100, 102-105, 107-129, 133, 134, 136-139, 141, 143, 144-149, 151, 153, and 154 submitted by Eco-Rapid Transit. These responses are included in Appendix D of the Final EIS/EIR in the "Improvement Districts and Joint Powers Authorities" grouping of submissions.
CC-11-28	See response CR-GEN-1 regarding identification of the LPA and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo.

The City of Bellflower
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September 28, 2021

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

RE: Comments West Santa Ana Branch (WSAB) Transit Corridor Draft Environmental/Environmental Impact Report

Dear Ms. Khanna,

The City of Bellflower ("City") has reviewed the West Santa Ana Branch (WSAB) Transit Corridor Draft Environmental Impact Report/Statement (EIR/EIS) and respectfully submits the following comments on the Draft EIR/EIS: CC-6-1

Section 1 – Summary: Areas of Concerns

Although the City is in general support of the West Santa Ana Branch (WSAB) Transit Corridor Project, Alternative 1 (Los Angeles Union Station to Pioneer Station), there are a number of concerns and mitigation measures that need to be addressed by the Los Angeles Metropolitan Transit Authority ("Metro"). The City's primary concerns include: CC-6-2

1. Vehicle traffic impact on Bellflower Boulevard – Metro refuses to believe there will be any traffic queuing issues. However, the City has proved there will indeed be a major vehicle impact on Bellflower Boulevard. Additionally, the traffic impact report provided was from 2017 and did not include several facilities that exist today, such as the Mayne Events Center & Los Angeles County Fire Museum, the City's downtown parking structure, a future 91-unit mixed-use development project at the southwest corner of Bellflower Boulevard and Mayne Street, and the traffic signals at Bellflower Boulevard/Mayne Street and Bellflower Boulevard/Harvard Street. CC-6-3

2. Parking impact to downtown Bellflower – The on-street parking analysis conducted in 2017 is flawed as the vehicle parking count was completed on a day and time in which no park was allowed due to street sweeping. Additionally, several changes have occurred in regards to loss of on-street parking capacity since 2017 and the current situation should be re-evaluated. CC-6-4

3. The proposed Maintenance and Storage Facility (MSF) impact on the surrounding neighborhoods – This is a major impact to the north side of town. But throughout CC-6-5

the entire EIR/EIS, Metro claims the MSF will have no impact on the surrounding neighborhood. The EIR references that this MSF site closely resembles the Lawndale site. This cannot be further from the truth. When the Lawndale site was selected, there were no residential units surrounding the site. Also, this site will be twice the size of the Lawndale site. Metro should be modeling the comparison of the proposed Bellflower site to the Santa Monica facility, and in doing so, provide Bellflower with the same mitigated improvements to our neighborhood as the Santa Monica neighborhood previously received. CC-6-5

4. Noise Issues – Even after Metro implements its noise mitigation measures, Bellflower will still have several (57 in total) cluster locations that will continue to experience severe or moderate impacts resulting from train noise. Metro offers no explanation as to why these sites cannot be mitigated. Again, a major negative impact on the community. CC-6-6

5. Vibration damage to the City's High Capacity Well and sub-grade reservoir – This was most likely done in error, but the EIR/EIS fails to recognize or identify that the City's high capacity water well, the City's 2-million-gallon reservoir and the City Public Works facility itself all lie adjacent to the Metro right-of-way. There is no call-out for a specific vibration analysis of these facilities in the EIR but there should definitely be one. This is another major issue as any loss of well or reservoir operations will have a devastating impact on 70,000 Bellflower residents CC-6-7

These concerns, along with others, are further explained in the subsequent sections of this letter. The City kindly asks that Metro fully consider and address each of our concerns. We believe addressing our concerns will promote the following values, consistent with NEPA and CEQA laws, as well as the goals of the project:

- Protect the communities and their sensitive land uses from Potential Significant Environmental Impacts.
- Maximize Economic and Community Development opportunities and not preclude them by construction design.
- Maximize opportunities for current local businesses and residents to thrive and not be displaced.
- Maximize Local, State, and Federal funding opportunities with environmental certification of a phased project, acknowledging the possible need for supplemental environmental documents for detailed aspects of each phase.
- Recognize the real impacts and create, implement and monitor mitigation measures that effectively reduce potential adverse impacts to a level of insignificance during construction and following the project completion.
- Build a quality, state of the art, regional transportation line.
- Minimize construction impacts including, but not limited to, traffic impacts associated with the diversion of tractor trailers and passenger vehicles onto secondary arterial and residential streets as well as additional construction impacts discussed below.

CC-6-8

- Plan for Safety and Security of system during project construction, anticipated future development surrounding the route, and operations through the deployment of video technology at station locations used to supplement local law enforcement.
- Minimize Noise, Vibrations and the generation of particulate matter from constriction and brake dust for all sensitive land uses, receptors and businesses with sensitive receptivity.
- Analyze housing, community development and recreational opportunities at staging and parking sites for the project.
- Promote and provide connections to other modes of transportation along the route including bike and pedestrian trails as identified in local bike plans and existing walking trails and providing adequate parking for residents and workers connecting to transit.
- Provide adequate parking to support station location on site and/by way of satellite parking structures supporting both transit and local businesses.

CC-6-8

Section 2 – Alternatives Considered/Project Description

Figure 2-31 Bellflower MSF Site Layout (Page 2-47)

The site layout presented in this exhibit shows the southeast most corner of the proposed site as occupying an existing City park facility, the Flora Vista Dog Park. Additionally, the layout shows the ingress/egress for the facility as being located to the eastern side of the property. The proposed site layout does not show any type of landscape setbacks.

CC-6-9

City Concerns:

While the Draft EIR document makes several references to the proposed Bellflower MSF site option, the Project Description in Section 2 provides an opportunity for the City to bring to light several general comments and concerns with what is proposed at this point.

Of utmost concern to the City, is that the top priority of the site's layout and eventual development should be to reduce the various impacts (visual, audible, operational, environmental and safety) the MSF will create for the surrounding neighborhoods. Throughout the EIR document, Metro claims that there will be little to no impact to the surrounding neighborhoods and therefore only minimal mitigation measures are needed. The City disagrees.

CC-6-10

The EIR document repeatedly states the proposed MSF will be similar to Metro Division 22 MSF in Lawndale. This could not be further from the case. The Division 22 MSF was built in the mid-1990's when the existing surrounding land uses were only commercial and industrial – no residential (neighboring residential units we later constructed in 2005). The Bellflower site has existing residential units on both the west and east side. Additionally, the Division 22 MSF is 10 acres in size whereas the Bellflower site is 22 acres, more than double in size.

CC-6-11

City Request:

For the purpose of study and comparison in the EIR document, Metro should utilize the Division 14 MSF site for comparison as the pre-construction land use is similar to the land use currently surrounding the proposed Bellflower site. At a minimum, the Bellflower site should include every mitigation measure the Metro Division 14 location received. The proposed facility will eliminate an important existing community asset and the loss of this asset will be significant. A community element benefitting the surrounding neighborhood needs to be included in the design. Traffic volume on Somerset Boulevard shall be analyzed to determine proper mitigation measures for safe vehicle ingress/egress into the MSF facility, coupled with mitigation measures for pedestrian safety associated with the existing pedestrian crossing for students and parents of Baxter Elementary School located less than 400 feet north of the proposed MSF site on Cerritos Avenue.

CC-6-11

Section 3 – Transportation

3.2.4.1 On- and Off-Street Parking Analysis (Page 3-10)

The loss of on-street parking itself is not an adverse effect under NEPA, but it can be a local concern. A visual survey was conducted for the parking Affected Area (approximately 0.25 mile around each station, along streets immediately adjacent to the proposed alignment and other project features, and off-street parking lots where permanent easements or acquisitions are required for the Project) to determine supply and utilization of on-street parking. On-street parking effects were assessed by comparing the observed parking utilization with the number of parking spaces available after the removal of spaces resulting from the Project.

City Concern:

As stated above, a visual survey was conducted for the Bellflower station area and can be found in the appendices section of the DEIR document as "Draft EIS/EIR Appendix D – Final Transportation Impact Analysis Report." In this document, the visual survey details specific to the Bellflower station can be found under section 4.5.1.13 and indicate that the visual inspection around the Bellflower station took place on Thursday, September 14, 2017 between the hours of 11:00 AM and 1:30 PM. The visual survey concluded that observations showed the on-street occupancy at only 30% on that date and time.

CC-6-12

- As is prominently posted throughout the majority of the streets surveyed, several segments of Bellflower streets are under "No Parking" restrictions every Thursday for weekly street sweeping activities between the hours of 8:00 AM and 1:00 PM, including the day of the visual survey.
- Of the 36 segments of streets surveyed, 27 (75%) of the segments prohibited parking during the time of the survey which contributed to the low on-street occupancy of 30%.

- The City also contends that any visual parking survey conducted near the proposed station should be done during critical AM and PM hours.
- Since the time of the survey (September 2017), there have been several significant changes to on-street parking surrounding the proposed station that did not exist at the time, including new red curb restrictions around the City's recently constructed parking structure, red curb installed at part of traffic signal projects (Bellflower/Mayne and Bellflower/Harvard) and limited time parking on Flora Vista Street.

CC-6-12

City Request:

For the reasons listed above, the City requests that Metro perform a new survey of the on-street parking using the following parameters:

- Visual analysis/survey be performed during the hours 6:00 AM to 8:30 AM as well as the hours of 4:00 PM to 6:30 PM.
- Any visual analysis/survey should NOT be conducted on a scheduled street sweeping day.

3.2.4.2 Spillover Parking Analysis (Page 3-11)

The spillover parking analysis considered whether operation of the Project could result in the demand for transit parking to exceed the parking supply being provided by the Project at the corresponding proposed station. Estimates of forecasted parking demand were extracted from the Metro regional travel demand model at each station where transit parking would be provided. At stations where transit parking demand is projected to exceed the number of parking spaces provided, the unutilized supply of on-street parking was also considered to determine if transit parking demand could be accommodated via available on-street parking. Adverse spillover parking impacts would occur if the demand is higher than the combined on- and off-street parking capacity at each station.

CC-6-13

City Concern:

As previously explained, the visual survey used in the document "Draft EIS/EIR Appendix D – Final Transportation Impact Analysis Report" is severely flawed as it does not take into account the present on-street parking capacity (today's capacity has significantly changed since 2017) and the actual survey was performed during posted "No Parking" restriction period for routine street sweeping activities. As a result, very few vehicles were parked on-street at that time and falsely represents the on-street parking capacity percentage Metro utilized in its report. More recent visual surveys performed by City staff on days when on-street parking is not prohibited by street sweeping activities shows the on-street parking occupancy between 80-85%.

When reviewing Table 3.35 Station Parking Demand – Alternative 1 on Page 3-79 of the Draft EIS/EIR document and utilizing current and correct on-street occupancy rates,

parking supply for the Bellflower station will be exceeded. In turn, this will create adverse spillover parking impacts for the neighborhood and represent an unmitigated negative impact to the residential and downtown areas surrounding the Bellflower station. Additionally, the lack of available on- and off-street parking will create environmental hazards as vehicles looking to park in the general area to utilize the train, visit the downtown businesses or simply find parking when going home will spend additional time idling and driving the neighborhood and increasing air pollution as a result.

City Request:

For the reasons listed above, the City requests that Metro perform a new survey of the on-street parking using the following parameters:

- Visual analysis/survey be performed during the hours 6:00 AM to 8:30 AM as well as the hours of 4:00 PM to 6:30 PM.
- Any visual analysis/survey NOT be conducted on a scheduled street sweeping day.
- Metro present alternative solutions to address the unmitigated impact caused by the spillover parking impact as well as address the increase in air pollution created as vehicles continuously circle the area looking for available parking, either on or off-street.

CC-6-13

Table 3.44. Mitigation Measures for Intersections Nos. 81, 82, and 84 (Page 3-99)

Specific to Mitigated Measure for Intersection 84 at Alondra Boulevard and Flora Vista Street, the mitigated measure is listed as TRA-17: Convert the two-way stop-controlled intersection to a signalized intersection. Metro would implement this measure subject to approval of the applicable jurisdiction (City of Bellflower).

City Concern:

Following Table 3.44 is "Figure 3-15. Intersections Nos. 81, 82, and 84 Lane Configuration with Mitigation Measures" which depicts the proposed changes at Alondra Boulevard at both Flora Vista Street (to the north) and Pacific Avenue (to the south). Currently, vehicles traveling westbound on Alondra Boulevard have a protected left turn lane allowing them to safely make a left turn onto southbound Pacific Avenue. Figure 3-15 shows that a left turn for vehicles traveling westbound Alondra Boulevard onto southbound Pacific Avenue will no longer be permitted after the implementation of TRA-17.

CC-6-14

City Request:

Vehicle access to Pacific Avenue from both west and eastbound Alondra Boulevard is important to the neighborhood with boundaries of Clark Avenue to the west, Pacific Avenue to the north and downtown Bellflower to the east. The elimination of the protected left turn onto Pacific Avenue leaves no alternative route for vehicles traveling westbound

on Alondra Boulevard to access this neighborhood as there are no proposed rail crossings between Bellflower Boulevard and Clark Avenue. The City requests that the protected left turn lane for westbound Alondra Boulevard vehicles not be eliminated without providing a viable alternative route to the neighborhood that will ultimately be negatively impacted by the loss of this access point. CC-6-14

Table 3.50. Construction Staging Areas and Haul Routes (Page 3-119)

Item No. 38 in Table 3.50 describes the construction staging area as being located at the northwest corner of Bellflower Boulevard and the railroad ROW. It also describes the proposed haul route from this location as SR-91, Bellflower Boulevard.

City Concern:

Bellflower Boulevard between Flora Vista Street and Flower Street specifically prohibits commercial truck traffic per City's municipal code. Commercial vehicles will be prohibited from leaving the proposed staging area and traveling south on Bellflower Boulevard, through the City's downtown area towards SR-91. CC-6-15

City Request:

The City will require Metro to list an alternative haul route from the proposed construction staging area described in Table 3.50, item No. 38 that does not violate the City's existing municipal code.

Section 3.6.3.7 Maintenance and Storage Facility

The Bellflower MSF site option would not introduce design elements that could increase hazards (e.g., new at-grade crossings, pedestrian crossings with safety issues). The MSF site options would be located on a site with fencing, preventing public access. Therefore, the MSF site options would not introduce design features that could result in hazards, would have less-than-significant impacts, and mitigation would not be required. CC-6-16

City Concern:

Currently, there is an existing crosswalk where Cerritos Avenue intersects with Somerset Boulevard (directly in the middle of the proposed Bellflower MSF location). This crosswalk represents the nearest crosswalk for students and parents walking to and from Baxter Elementary School daily. The school is located less than 400 feet away from the proposed Bellflower MSF site. Vehicles traveling in and out of the MSF will increase potential safety issues for this crosswalk.

City Request:

The City requests that Metro provide a mitigation plan that will account for the existing crosswalk use and the impact that the additional vehicles and operations associated with the MSF will have on the crosswalk. CC-6-16

Section 4 – Affected Environment and Environmental Consequences

Table 4.1.2. Existing Land Uses in the Affected Area and Surrounding Area of the Station Areas and Design Options (Page 4-12)

City Concern:

In this table, the "Affected Area" column only defines the land use within 50 feet of the station as commercial. It fails to list the City's parking structure - a public facility – which also lies within the 50-foot buffer, immediately to the south. Additionally, the "Surrounding Area" column is left blank. This column should include the following land use categories within 0.25 miles of the stations as residential, commercial, open space and institutional/public facilities. CC-6-17

City Request:

Please make these changes to the Draft EIR document to correctly reflect the actual land uses for both the "Affected" and "Surrounding" columns.

Section 4.2.3.2 Alternative 1: Los Angeles Union Station to Pioneer Station (Page 4-44)

Access and Mobility Summary:
While increased vehicle delays at intersections, turning movement restrictions, street closures, and installation of safety barriers or sound walls would occur under Alternative 1, the physical layout of the affected communities would remain similar to existing conditions and would not impede community access and mobility. Alternative 1 would shift some access and mobility patterns in the Affected Area for communities, resulting in different community access routes when compared to those under existing conditions. Access to the surrounding residential neighborhoods, businesses, and community assets would remain. CC-6-18

City Concern:

The selected at-grade crossing for Bellflower Boulevard will cause vehicle queuing through multiple signalized intersections for both north and south traffic during peak hours. The significant queuing will have a resonating negative impact on vehicles accessing the densely populated neighborhood and the downtown district south of the rail line. Community access and mobility will be negatively impacted and the excessive

traffic log jam that results from the queuing will increase air pollution in the immediate areas as vehicles spend unnecessary time waiting for the roadway to clear.

City Request:

The City requests that Metro provide alterative solutions to the increase in vehicle emissions caused by unnecessary vehicle queuing lines as well as alternative solutions to residents entering and exiting the neighborhood west of Bellflower Boulevard and south of the rail line. At this time, no viable solution has been presented by Metro to improve these unmitigated impacts.

CC-6-18

Table 4.2.4. Build Alternatives Effects on Community Character and Cohesion (Page 4-49)

City Concern:

In the above-mentioned table under the column title "Residences, Community Assets, or Commercial Businesses Permanently Acquired/Displaced" it states "At multifamily residential on east side of Bellflower Blvd, north of project alignment, partial acquisition of 10 multifamily residential units for grade-crossing improvements. Displacement of 16 residents."

CC-6-19

City Request:

The City cannot identify these 10 units anywhere else in the draft EIR document. Please provide specific details as to which units are being discussed in this comment.

4.2.3.7. Maintenance Storage Facility Site Options (Page 4-60)

Bellflower MSF Site Option:
The Bellflower MSF site option is located south of Somerset Boulevard in Bellflower, and the site is currently leased by Bellflower to the owners of a privately-owned recreational business. The Bellflower MSF site option is surrounded by single- and multifamily residences, mobile home communities, and industrial and commercial businesses. Security barriers would be installed along the perimeter of the Bellflower MSF site option. The MSF site option would not involve any roadway/intersection closures or turning restrictions that would restrict access to nearby residential neighborhoods or community assets. Pedestrian and vehicular access to nearby residential neighborhoods and mobile home communities would be maintained. Additionally, operation of the MSF is not expected to adversely affect any of the nearby street intersections. The lead tracks proposed within the PEROW on the south side of the MSF site option would not impede access to the Bellflower Bike Trail because the bike trail would be located south of the proposed lead and LRT tracks. Under NEPA, the Bellflower MSF site option would not result in adverse effects related to community access and mobility.

CC-6-20

City Concern:

The ingress/egress for the MSF off of Somerset Boulevard will be compromised by the existing vehicle traffic on Somerset Boulevard, particularly during peak commuting hours for parents/students both walking and driving to Baster Elementary school, located less than 400 feet from the proposed site. The existing crosswalk located at Cerritos Avenue represents the only pedestrian crossing for school access.

City Request:

If this site is ultimately selected, the City reserves the right to request an independent traffic study specific to the site development that will take into account the latest traffic count numbers (2020) for Somerset Boulevard, the current traffic impact analysis report for Paramount Petroleum expansion project (TIA estimates 1,000 trips per day of heavy duty commercial fuel haulers that routes these vehicles south on Lakewood Boulevard and east on Somerset Boulevard) and the pedestrian safety associated with the school crosswalk located immediately in front of the proposed MSF site. Any mitigation recommendations that result from this independent traffic study will subsequently be required as part of the site development.

CC-6-20

Table 4.3.6. Permanent Residential Displacements by Jurisdiction (Page 4-33)

Under the listed category of "Alternatives 1, 2, 3 & 4" only the jurisdictions of Paramount and Artesia are shown as having full or partial acquisitions and displacements.

City Concern:

According to Table 4.2.4 Metro states that there will be partial acquisition of 10 multi-family units displacing 16 residents.

City Request:

Please correct this table to reflect that Metro does in fact plan to displace 16 Bellflower residents as part of its train project.

CC-6-21

Table 4.4.1. Scenic Resources in Affected Area for Visual (Page 4-51)

City Concern:

This table does not include the Carpenter House Museum, a registered State historical site that sits on the Caruthers Park property.

CC-6-22

City Request:

The City requests that this facility be listed in the table to accurately reflects the scenic resources list for Bellflower.

CC-6-22

4.7.3.7. Maintenance and Storage Facility

Vibration: The Bellflower MSF site option is approximately 75 feet from the nearest residential land uses along Virginia Avenue. Train movements through crossover trackwork at 10 mph are predicted to result in a GBV level at these residential land uses of 71 VdB, which would not exceed the FTA impact threshold of 72 VdB. Train vibration is predicted to be below the impact threshold based on FTA guidance. Vibration impact is unlikely at the residential land uses along Virginia Avenue. Under NEPA, the Bellflower MSF site option would not result in adverse effects related to vibration.

City Concern:

Directly west of the proposed MSF, Dante Value Company is a manufacturing company that specializes in the manufacturing of value components for the United States military. This is a highly precise manufacturing operation that could experience severe impacts from vibrations associated with the operation of the rail line and the proposed MSF.

CC-6-23

City Request:

Based on the EIR document and discussions with the business itself, Metro has made no attempt to study vibration impacts and the effects on business operations. The City requests that, at a minimum, Metro staff contact the business and work with them in an effort to determine if there will be any impacts to their operations as a result of vibration.

4.7.4.2. Mitigation Measures

Mitigated LRT Noise (Page 4-267):

As shown in Table 4.7.6, after implementation of Mitigation Measures NOI-1 (Soundwalls), NOI-2 (Low Impact Frogs), and NOI-3 (Wheel Squeal Noise Monitoring), Alternatives 1 and 2 would result in 110 moderate and 60 severe impacts. Alternative 3 would have 101 moderate impacts and 59 severe impacts, and Alternative 4 would have 59 moderate impacts and 44 severe impacts. Implementation of mitigation would reduce impacts at many receptors, if not eliminating them. Mitigation under Alternative 1 would result in 165 benefited receptors, 166 benefited receptors under Alternative 2, 132 benefited receptors under Alternative 3, and 89 benefited receptors under Alternative 4. Mitigated impacts and impacts remaining after mitigation are shown in Table 4.7.7 through Table 4.7.10 and Figure 4.7-5 through Figure 4.7-11. Some impacts are not mitigable due to physical features preventing installation of soundwalls or the combination of mitigation measures not being able to provide adequate attenuation due to elevated

CC-6-24

project noise levels. Available mitigation methods, including soundwalls, methods to reduce special track work noise, and wheel squeal have been applied to reduce LRT noise to the greatest extent feasible. An explanation of areas where mitigation is not feasible or reasonable is included in Table 4.7.8.

City Concern:

As underlined above, Metro staff's preferred Alternative 3 shown in Table 4.7.6 shows that after mitigation measures are implemented, there will continue to be 101 clusters moderately impacted and 59 clusters severely impacted by train noise. Nearly 40% of the remaining clusters (57 clusters) are located within the City of Bellflower - 27 clusters (representing 27% of the Alt 3 total) rated as moderate clusters and 15 clusters (representing 25% of the Alt 3 total) rated as severe clusters AFTER mitigation measures are implemented.

The second underlined section states that Table 4.7.8 provides an explanation of areas where mitigation is not feasible or reasonable. Metro's EIR only presents an explanation as to why mitigation measures will not work for 2 of the 57 clusters in Bellflower.

CC-6-24

City Request:

The City requests that Metro provide a detailed explanation as to why, after mitigation measures are implemented, that the 55 clusters that will continue to experience moderate and severe noise impacts associated with the operation of the LRT. Without explanation, these 55 locations are considered to be unmitigated negative impacts to the Bellflower community, most of which are single and multi-family residences.

4.11.2.4. Groundwater

Figure 4.11-5. Groundwater Basins and Facilities (Page 4-429)

City Concern:

This map, as well as the entire Draft EIR document, does not recognize or consider the City of Bellflower's High Capacity Water Well or the City's 2 million gallon below-ground water reservoir. Both of these facilities represent the sole source of potable drinking water for over 80% of the Bellflower community. The High Capacity Well is over 1,300 feet deep and the well head is located 20 feet north of the Metro ROW. The southern wall of the City's reservoir is located 55 feet north of the Metro ROW. Both of these facilities are located within the confines of the Bellflower Public Works facility located at 9944 Flora Vista Street. Similar to the high capacity well and the reservoir, the Draft EIR document fails to recognize the Public Works facility, it's operations and the Land Use Category. As a result of this omission, there are several unmitigated impacts that the LRT will cause.

CC-6-25

City Request:

The City requests that these facilities be incorporated into the Draft EIR document and properly evaluated in regards to all aspects of the EIR report. Additionally, due to the close proximity of the Metro project to the City's reservoir and water well, a detailed vibration analysis should be completed to ensure that there will be no physical impacts caused to these facilities by ground-born vibration during construction as well as long-term vibration train operations. Any potential damage caused to either facility would have a significant financial impact on the community as the cost of repairs, or worse, the cost to drill a new water well in an alternate location, would be passed on to the community. CC-6-25

APPENDIX D – TRAFFIC IMPACT ANALYSIS REPORT

Section 2.3.8 Bellflower MSF Site Option

The Bellflower MSF site option is bounded by industrial facilities to the west, Somerset Boulevard and apartment complexes to the north, residential homes to the east, and the PEROW and Bellflower Bike Trail to the south. The site is approximately 21 acres in area and can accommodate up to 80 vehicles (Figure 2-7).

CC-6-26

City Concern:

The description of the surrounding uses of the potential MSF site is incorrect and does not account for the existing residential mobile home park on the west side.

City Request:

Please change the description to correctly reflect that the site is bound by industrial facilities and residential homes (mobile home park located at 9020 Somerset Blvd) to the west.

Section 1.5.10.2 Recommendation and Application of LADOT Guidelines for LOS Evaluation under NEPA

The conclusion from these assessments is that the best approach is to apply LADOT's 2016 Transportation Impact Study Guidelines, which represent an effective and accurate assessment methodology for potential delay-related traffic and transportation impacts that can be applied to the Build Alternatives. Also, these same procedures were applied in Metro's recent similar environmental study (Metro L [Gold] Line Foothill Extension Phase 2B). Alternative approaches, given the length of the Build Alternatives corridors and the 17 local jurisdictions involved, make it impractical to use different guidelines for different jurisdictions. CC-6-27

City Concern:

As the City has previously stated to Metro staff in past discussions, Metro's decision to use the City of Los Angeles' 2016 Transportation Impact Study Guidelines was made out of ease for Metro staff and its consultants. Traffic operations within the City of Bellflower do not remotely reflect traffic operations in the City of Los Angeles nor is it accurate for Metro to assume that they do. Metro's decision to ignore the unique traffic operations in each City and simply apply a blanket standard to all cities in an effort to claim "one size fits all" ignores any potential mitigation measures that may be required in each City. CC-6-27

APPENDIX M – NOISE AND VIBRATION IMPACT REPORT PART 1

4.2 Vibration

Table 4.2. Long-Term Noise Monitoring Locations

City Concern:

This table only lists one location within the City of Bellflower and it is defined as a Category 2 Land Use.

City Request: CC-6-28

The EIR report should consider multiple locations with various land use categories as Long-Term noise monitoring locations. Potential location options would be City Hall/Bristol Civic Auditorium located less than 50 feet from the rail line or the Mayne Events Center/L.A. County Fire Museum located less than 50 feet from the rail line. The City requests that both of these locations be added as long-term noise monitoring locations as they represent different land use categories and are located less than 100 feet of the rail line.

Table 5.1. Vibration Category 2 Land Use Light Rail Vibration Assessment – Alternatives 1

City Concern:

In this table, Footnote 3 states "Predicted GBV at these locations include a -10 deduction for building coupling loss." CC-6-29

City Request:

The footnote does not reference an accepted guideline or source of the -10 deduction. This amount represents a significant decrease of the predicted GBV. The footnote should include the source from which this guideline was obtained.

Appendix A - Unmitigated LRT Noise Clusters, Noise Monitoring Locations and Impacts (Page A-22)

City Concern:

In regards to this diagram, there are significant cluster locations that Metro has failed to identify or incorrectly identified. These locations are as follows:

- N264 is not a residential Category 2 Land Use
- Building immediately to the north of N264 is the Mayne Events Center and LA County Fire Museum which would be a Land Use Category 3 with a degree of impact rated as severe.
- Property immediately southeast of N267 is the Bellflower Public Works facility which would be a Land Use Category 3 with a degree of impact rated as severe.

CC-6-30

City Request:

The City requests that the diagram be amended to include these locations and the degree of impact as they each represent a significant cluster that is not identified in the EIR document. By not being identified, any negative impacts to these facilities are unmitigated at this time and need to be evaluated to determine proper mitigate measures.

APPENDIX BB – DRAFT SECTION 4(f) AND 6(f) EVALUATION

Section 4.1 Historical Sites

City Concern:

Metro and its team of consultants failed to recognize, identify and provide a description and evaluation of the Carpenter House Museum, a registered historical site with the State. The Museum is located within the boundaries of Caruthers Park which lies adjacent to Metro right-of-way. The Carpenter House Museum is dedicated to sharing the history of the City of Bellflower.

CC-6-31

City Request:

The City requests that this facility be evaluated and subsequently included in the list of historical sites in Appendix BB.

Section 5 – Noise

1. Appendix G (Mitigated LRT Noise Clusters, Noise Monitoring Location and Impacts) of Appendix M (Final Noise and Vibration Impact Analysis Report) indicated that locations N245, N246, N247, N249, N251, N253, N261, N267, N268, N274, N275, N283, N284, and N287 will continue to experience "Severe" noise impacts, even with implementation of mitigation measures.

CC-6-32

City Concern:

These particular locations are near Alondra Boulevard, Clarke Avenue, Orchard Avenue, Flora Vista Street, and Woodruff Boulevard in the City of Bellflower, and are characterized as "Residential", which are considered sensitive receptors to excessive noise levels. CC-6-32

City Request:

The City requests that additional mitigation measures be considered and required in the EIR to ensure that all noise levels are reduced to insignificant levels.

2. The following noise-related mitigation measures require additional clarification and explanation:

   - "NOI-1 Soundwalls. Soundwalls would be placed at the edge of the right-of-way or at the edge of aerial structures to reduce noise related to light rail transit vehicles at the identified sensitive receiver locations.... Height and length will be verified during final design to meet FTA requirements."

     Page 8-1 of Appendix M (Final Noise and Vibration Impact Analysis Report) recommended several soundwalls that measure 8 feet high near the LRT and along the train track ROW alignment. From a practical standpoint, while these recommended 8-foot walls could be capable of attenuating noise levels, construction of said 8-foot walls could be infeasible at certain locations, given neighboring land uses, varied topography, and land ownership patterns. The EIR must assess the feasibility of each recommended 8-foot wall to determine whether said wall could actually be constructed. If said wall is infeasible and cannot be constructed, then the mitigation measure cannot be implemented. CEQA indicates that infeasible mitigation measures cannot be considered by or recommended in the EIR. If the mitigation measure cannot be implemented, then the noise impact will continue to be significant and "Severe". CC-6-33

   - "NOI-2 Low Impact Frogs. Low impact frogs (Crossing point of two rails) would be installed...to reduce crossover impact noise. Locations will be verified during final design."

     Though Low Impact Frogs are referenced in this mitigation measure as a noise attenuation measure, the EIR does not thoroughly assess or measure how much noise reduction will actually occur at each specified location with the recommended Low Impact Frogs. The statement in the mitigation measure "Locations will be verified during final design", implied that the precise locations of these recommended Low Impact Frogs are still unknown. The EIR must assess and measure how much of the noise levels will be reduced and provide

the locations for these recommended Low Impact Frogs. If these recommended Low Impact Frogs do not reduce noise levels to insignificant levels, then the mitigation measure should not be considered or recommended.

- "NOI-4 Crossing Signal Bells. Crossing signal bells...would be equipped with shrouds to direct bell noise away from sensitive receivers. Crossing signal bell noise would not exceed 104 dBA sound exposure level at 50 feet. This measure is subject to CPUC approval."

  "NOI-5 Gate-Down-Bell-Stop Variance. Metro would apply for a gate-down-bell-stop variance to reduce the duration of bell ringing and therefore reduce impacts at sensitive receivers. Crossing signal noise would not exceed 30 seconds in duration. This measure is subject to CPUC approval."

  NOI-4 and NOI-5 provided mitigation measures to reduce crossing signal bell, and gate-down-bell noise levels. However, the EIR did not analyze or measure how much noise could potentially be generated by crossing signal bells and gate-down-bells. In accordance with CEQA, mitigation measures should only be recommended to alleviate potential impacts that are actually evaluated in the EIR. Therefore, the EIR must assess and measure how much crossing signal bell and gate-down-bell noise levels will actually be generated and how much of the noise levels will be reduced with Mitigation Measures NOI-4 and NOI-5.

  Furthermore, Mitigation Measures NOI-4 and NOI-5 require additional approval by the CPUC. The EIR should discuss the approval process, including information and details that will be reviewed by the CPUC. If the CPUC does not approve the Crossing Signal Bells and recommended shrouds, or the gate-down-bell-stop variances, then the mitigation measures should not be considered or recommended. CC-6-33

3. Page 7-20 of Appendix M (Final Noise and Vibration Impact Analysis Report) provided the following general statements when evaluating potential construction-related noise impacts resulting with the proposed Bellflower MSF: "Construction of the maintenance and storage facility at Paramount (should be Bellflower) would exceed the FTA standards for residential uses. Therefore, without mitigation, impacts related to temporary or periodic increases in ambient noise levels would be potentially significant."

   City Concern:

   The above statements were inadequate when discussing construction-related noise impacts. The EIR needed to evaluate and quantify noise levels resulting with actual construction activities and equipment required for construction of the Bellflower MSF. The EIR should have then evaluated how and to what extend

those sensitive receptors and residences that neighbor the Bellflower MSF would be adversely impacted and disturbed.

The EIR offered Mitigation Measure NOI-8 which was a "Noise Control Plan", as a solution to alleviating construction noise impacts. However, it is difficult to determine if preparation of a future Noise Control Plan would be adequate enough to mitigate construction noise impacts, since the EIR did not thoroughly assess or quantify noise levels or impacts, nor identify what neighboring sensitive receptors would be impacted. The EIR, to some extent admitted that the impact discussions were inadequate by stating that "... in some instances the FTA construction impact criteria may still be exceeded. Therefore, impacts related to temporary or periodic increases in ambient noise levels would be significant and unavoidable with mitigation." The use of the word "may" indicated that the EIR could not conclude whether significant construction noise impacts would actually result with construction of the Bellflower MSF. CC-6-33

City Request:

Again, the EIR must evaluate and quantify noise levels resulting with actual construction activities and equipment that would be required for construction of the Bellflower MSF, and also evaluate how and to what extend those sensitive receptors and residences that neighbor the Bellflower MSF would be adversely impacted and disturbed.

4. Similar to the above comments relating to the Bellflower MSF, Appendix M (Final Noise and Vibration Impact Analysis Report) only provided generalized discussions of construction noise impacts resulting with the LRT. In fact, the EIR admitted that: "Environmental impacts and consequences were analyzed for the Project as a whole and not broken down by geographic section as the urban nature of the Affected Area is generally consistent across geographic sections for this resource."

City Concern: CC-6-34

This decision to only evaluate construction noise impacts in a generalized manner is unacceptable. The Bellflower LRT and the adjoining train tracks will be located in and will traverse through portions of the City that are built-out with residential and other sensitive receptors.

City Request:

The EIR must evaluate and quantify noise levels resulting with actual construction activities and equipment required for construction of the Bellflower LRT, MSF, and the adjoining train tracks, and also evaluate how and to what extend those

sensitive receptors and residences that neighbor these improvements would be adversely impacted and disturbed. CC-6-34

Section 6 – Air Quality

1. Section 4.5 (Air Quality) of the EIR and Appendix J (Final Air Quality Impact Analysis Report) only provided generalized discussions of air quality impacts resulting with operations of the Bellflower LRT and MSF, which is unacceptable.

   The Bellflower LRT, MSF, and the adjoining train tracks will be located in and will traverse through portions of the City that are built-out with residential and other sensitive receptors. The EIR must therefore, evaluate and quantify air quality emission and pollutant levels resulting with operations of the Bellflower LRT, MSF, and the adjoining train tracks, and also evaluate how and to what extend those sensitive receptors and residences that neighbor these improvements would be adversely impacted and disturbed. CC-6-35

   Furthermore, the analysis of air quality impacts was based on an assumed reduction in vehicle traffic generation. Though it is acknowledged that increased train ridership will likely reduce public reliance on automobiles, the air quality analysis should also evaluate other sources of air pollution that would result directly from increased train travel. The type and levels of air emissions and pollutants from train movements and increased ridership should be thoroughly evaluated in the EIR. In addition, the EIR must then evaluate and quantify (through modeling) how these types and levels of air emissions and pollutants will impact those specific residences and other sensitive receptors that neighbor the Bellflower LRT, MSF, and train movements along the tracks.

2. Similar to the above comments relating to air quality impacts that would result with operations of the Bellflower LRT, MSF, and train movements along the tracks, the EIR must also evaluate and quantify (through modeling) the type and levels of air emissions and pollutants resulting with actual construction activities and equipment required for construction of the Bellflower LRT, MSF, and the adjoining train tracks, and also evaluate how and to what extend those sensitive receptors and residences that neighbor these improvements would be adversely impacted and disturbed by air emissions and pollutants. CC-6-36

Section 7 – Historical

1. As requested in the City's August 21, 2018 letter on the Notice of Preparation, the EIR provided a thorough discussion of the Bellflower Pacific Electric Railway Depot, and an older house at 10040 Flora Vista Street. However, the EIR did not provide a similar discussion of the City monument signage and fountain, and the Bellflower Bike and Pedestrian Trail as historical resources. Please provide CC-6-37

thorough discussions of these particular historical resources as requested in the City's August 21, 2018 letter on the Notice of Preparation. CC-6-37

Section 8 – Biology

1. The City in its August 21, 2018 letter on the Notice of Preparation, requested that bio-swale/flood control measures along the track ROW alignment be discussed and evaluated in the EIR. The City letter requested that bio-swale design, vegetation, depth of water table, etc. should be evaluated in the EIR. CC-6-38

   These issues, however, were not evaluated in the EIR, but should have been. Accordingly, the City continues to request that the EIR thoroughly evaluate bio-swales/flood control measures that could be required at the LRT and MSF locations, and along the track ROW alignment. Bio-swale design, vegetation, depth of water table and other similar features are issues requiring evaluation in the EIR.

Section 9 – Traffic (Chapter 3 of Draft EIR/EIS)

- The study in Chapter 3 of the Draft EIR/EIS states operational analysis via Synchro was completed to assess traffic related impacts, delay and queue. Synchro does not have the ability to replicate a train crossing. Therefore, how was Synchro used to address this deficiency? Please define how this was completed. CC-6-39

- Did the Synchro analysis incorporate existing traffic signal timing? Did said analysis recognize the new traffic signal to be constructed at the intersection of Bellflower Boulevard at Harvard Street? Did the analysis recognize that the intersections of Bellflower Boulevard at Flower, Oak, Mayne and Harvard operate in a split phase manner for north and south Bellflower Boulevard? In addition, the Bellflower Boulevard at Belmont Street operates as a pedestrian scramble intersection? If these factors were not incorporated the analysis may be presenting erroneous results.

- Present the results of the queue analysis graphically such as superimposition onto an aerial photograph for each crossing location as well as evaluating queueing on all intersecting streets. For example, when vehicles turning left from Mayne Street onto northbound Bellflower Boulevard during gate crossings, what is the back queue on Mayne Street? CC-6-40

- When were the traffic counts collected that were used in this analysis?

- To replicate actual traffic behavior, the City may be using flag people to temporarily stop traffic consistent with gate crossings every 2.5 minutes during the AM and PM peak hours to document true traffic impacts.

- The study did not incorporate the traffic impacts associated with the upcoming AltAir project impacts at the existing Paramount refinery located near the northwest corner of Lakewood Boulevard at Somerset Boulevard. A traffic study for that project was completed and is being revised. The AltAir project is expected to generate 540 daily inbound and 540 daily outbound truck trips and is anticipated to create traffic impacts at the Lakewood at Somerset intersection with possible impacts to the Lakewood at Paseo intersection. The study needs to look at the cumulative effects of this and all future projects. This will also impact the crossing on Somerset Boulevard west of Lakewood Boulevard. CC-6-40

- **Table 3.8** states 576 existing on-street parking spaces are available over a 164-acre area. Please define said 164-acre area. Also, a recent City parking assessment identified 185 on-street parking spaces serving the downtown area around and including Bellflower Boulevard north of Flower Street. The table shall be revised accordingly. CC-6-41

- A vibration analysis is required along the entire corridor. It is noted that a local business located at the northeast corner of Lakewood Boulevard at Paseo Street produces highly sensitive equipment used by the United States military and vibrations could significantly impact this business. CC-6-42

- **Page 3-47** identifies the intersections of Flora Vista/Clark, Alondra/Clark and Alondra Flora Vista at LOS F with delay up to 420 seconds. What is the resulting queue length from these delays? The report stated 80 seconds or greater of delay is LOS F. The report states that at 80 seconds of delay or greater results in severe intersection congestion with long delays and excessive queueing. If that is what occurs at 80 seconds, how would 420 seconds appear to the motorist?

- **Page 3-49** states that vehicle queues would exceed vehicle storage at Lakewood/Somerset, Clark/Alondra, Alondra/Clark, Bellflower/Flower and Bellflower/Oak. The report goes on to state that these impacts will be minimized via queue cutter and/or pre-signals. What does minimize mean? Please quantify the queue at all of these intersections post mitigation. Queue cutters are designed to prevent vehicles from queuing onto the tracks, not to reduce delay related vehicle queues. CC-6-43

- **Table 3.16** states the following intersections are without adverse effects; Somerset/Lakewood, Paseo/Lakewood, Alondra/Pacific, Alondra/Stevens, Bellflower/Flora Vista, Bellflower/Mayne, Bellflower/Oak. In other portions of the report some of these same intersections are defined as having impacts. That is not possible to have no impact and simultaneously have an impact. CC-6-44

- **Table 3.35** shows the Bellflower station to be under parked with on-street parking available to meet the excess demand. However, the report overstates the available CC-6-45

on street parking supply as well as current utilization of the on-street parking supply. The conclusions are erroneous.

- The report states that some on-street parking will be removed. The removal of any on-street parking is not acceptable to the business community.

CC-6-45

- **Section 3.5.1**, TR PM-2 states existing lane configurations near at grade crossings will be modified. What does that mean? Please define and provide the results of any analysis that reflects the delay and queue associated with any lane configurations or other geometric changes.

CC-6-46

- **Section 3.5.2.1** states that mitigation measures include street closures. Has the study defined which streets? How will the impacts of re-routed traffic be addressed? Has that been considered?

CC-6-47

- **Table 3.44** describes converting the existing two way STOP control to traffic signals at the intersections of Clark/Flora Vista and Alondra/Flora Vista. Specific studies will be required along with the development of timing and coordination subject to City review and approval. How is the coordination of traffic signals to be accomplished?

CC-6-48

- **Figure 3.15** appears to show the elimination of left turns from west bound Alondra onto Pacific Avenue, right turns from eastbound Alondra to Pacific, and left turns from Pacific to Alondra. If true, why? If true, what are the traffic impacts of these restrictions?

CC-6-49

- **TRA-21** states METRO will work with the local jurisdiction, business owners and the affected communities to assess the need for an off-street parking management program. Please be more specific as to what this means. Same comment applies to any on-street parking removal at any location including but not limited to all crossings as well as the proposed Bellflower Maintenance and Storage Facility (MSF).

CC-6-50

- **TRA-22** discusses the possible need for angled parking. However angled parking would require the removal of a travel lane which would only contribute to more delay.

CC-6-51

Section 10 – Economic and Parking Impacts

The following construction-related mitigation measures require additional clarification and explanation:

- **"COM-1 (Construction Outreach Plan)** would require Metro to develop a Construction Outreach Plan to minimize effect to affected communities and

CC-6-52

businesses and minimize impact to community gatherings or festivals in the project area."

City Concern:

Page 8-1 of Appendix CC (Final Economic and Fiscal Impact Analysis Report) indicated that Metro would develop a Construction Outreach Plan as part of Metro's Construction Relation & Mitigation Programs in Community Relations in coordination with affected communities and businesses that would be implemented by Metro and its contractors during construction of the Project. The Construction Outreach Plan is not enough.

CC-6-52

City Request:

The EIR should include the establishment of a Business Interruption, Promotion and Marketing Fund for each city, administered locally by each city. For the City of Bellflower, this fund will provide financial support to businesses negatively impacted by construction activities surrounding the four at-grade crossings (Lakewood Blvd., Clark Ave., Alondra Blvd., and Bellflower Blvd.), especially Downtown Bellflower.

- **"TRA-23 Loss of Parking (Construction):** Metro would require would coordinate with local jurisdictions to addresses the loss of public parking spaces during construction. This could include, but not be limited to, restriping the existing street to allow for diagonal parking…"

City Concern:

This mitigation measure is not practical and infeasible in Bellflower, especially on Bellflower Blvd., due to limited street width/public right of way and the resulting needed 3-phase traffic signal timing.

CC-6-53

City Request:

As this is not an effective mitigation, the EIR needs to offer alternative mitigation measures to address the loss of parking during construction.

- **"TRA-22 Loss of Parking (Permanent)**: Metro would require would coordinate with local jurisdictions to addresses the physical loss of public parking spaces resulting from implementation of the project. This could include, but not be limited to, restriping the existing street to allow for diagonal parking…"

CC-6-54

City Concern:

This mitigation measure is not practical and infeasible in Bellflower, especially on Bellflower Blvd., due to limited street width/public right of way and the resulting needed 3-phase traffic signal timing.

CC-6-54

City Request:

As this is not an effective mitigation, the EIR needs to offer alternative mitigation measures to address the permanent loss of parking resulting from implementation of the project.

Section 11 – Land Use

1. ***Section 4.1.1.1*** – Under Section 4.1.1.1 related to local plans, policies, and regulations, Downtown Bellflower's Transit Oriented Development Specific Plan (TOD SP) is not included.

   CC-6-55

   City Request:

   The City requests that the EIR be revised to reference the TOD SP. In addition, the EIR must evaluate any land use impacts based on, without limitation, the City's General Plan and TOD SP.

2. ***Section 4.1.3.2*** - This section indicates that portions of the "alignment structures would be built on retained fill with retailing walls or supported by columns that could create a barrier and separate land uses on both sides of the rail ROW (specifically, Flora Vista Street between Cornuta Avenue and Flower Street, and Flora Vista Street between Woodruff Avenue and California Avenue)." It further indicates that "barriers introduced along the proposed alignment would follow the Metro Rail Design Criteria (MRDC) guidance or equivalent criteria."

   CC-6-56

   City Request:

   The City requests input in the design of the barriers as these barriers could impact the visual and aesthetics of the surrounding areas where no barrier was previously located.

3. ***Section 4.1.3.6*** - Under Section 4.1.3.6 Consistency with Local Land Use Plans, Policies and Regulations – Bellflower MSF Site Option, it indicates that the "Bellflower MSF Site Option currently operates as a commercial business, that the property is not designated as a significant park or recreation area, and is not designated as having an important role in meeting the park and recreation objectives of the City." This statement is incorrect. This property was previously utilized as a golf and tennis center and operated on a concessionaire/lease

   CC-6-57

agreement. The golf and tennis center was identified as a Bellflower recreational facility to meet recreation needs of the community in the Open Space Element of the General Plan. In addition, the Open Space Element of the General Plan includes the total acreage of this site towards its park and recreation inventory. The existing use on the property as a paintball, airsoft, and BMX park is similar to the golf and tennis center in that it provides a significant recreational need of the community. In addition, it is the largest, open space parcel in the City.

City Request:

The EIR must be revised to evaluate, analyze, and address the elimination of 22 acres of significant recreational open space by converting this site to an MSF. The City previously adopted Resolution No. 18-67, which repealed Resolution No. 17-33, and restated the City's position of support, with conditions, on the potential use of this parcel as a potential location for the MSF. One of the conditions was that the MTA set aside and develop a location of not less than 1.5 acres of active "open space" within or adjacent to the proposed light rail maintenance facility site to service the residential community living on Somerset Boulevard and the Bellflower Community as a whole in a manner to be approved by the Bellflower City Council. Another condition included that the purchase price paid for the property be based on the fair market and will be sufficient to offset the costs of establishing adequate supplemental and/or replacement open space opportunities within the City of Bellflower. This City has always considered this site as a significant site in providing recreational open space and the EIR must be revised to consider the potential impacts in the loss of open space. CC-6-57

Section 12 – Acquisitions and Displacements

- ***Table 4.3.6*** – This table shows Permanent Residential Displacements by Jurisdiction and Bellflower shows all zeros across the columns. However, under the Residential Displacements Section of each Alternative, it lists Bellflower as having residential displacement. CC-6-58

  City Request:

  The City requests that these sections be revised to be consistent with one another.

Section 13 – Visual and Aesthetics

1. ***Table 4.4.8*** – In this table for the Bellflower Station Scenic Resources, it indicates that "views would remain available south of PEROW and along Bellflower Bike Trail; would not obstruct north-facing views of original Bellflower Pacific Electric Station." This section does not address the visual impacts from the north side of the PEROW and south facing views and identifies the change in visual qualify as "Neutral." CC-6-59

City Request:

The City requests that the document address the south facing views and the visual character of this area.

CC-6-59

2. ***Table 4.4.8*** – In this table for the Aerial Structures (32 feet height (36 feet with sound wall)), at Woodruff Ave/Flower St/Flora Vista St, the "Viewer Sensitivity" indicates that the "retaining wall would be new visual element. Visible from residences to the south or PEROW (primarily from second-story windows) and along north side of Flora Vista St." These 36' high walls will be constructed where no walls over 8 ft. high are currently located, thus creating a significant impact to the surrounding area. The mass and scale of the walls will be significant.

CC-6-60

City Request:
The City requests that mitigation measures be added to soften the visual impact of massive retaining walls where no high walls currently exist. Landscaping, public art, decorative block, and similar decorative treatment should be added to the retaining walls to make them visually and aesthetically pleasing.

3. **Table *4.4.8*** – In this table for the Aerial Structures (32 feet height (36 feet with sound wall)), at Woodruff Ave/Flower St/Flora Vista St, the "Visual Character" indicates "new visual element in area with low-rise commercial and residential structures; scale consistent with surrounding low-rise structures." The scale of a 36' high retaining/sound wall is not consistent with the surrounding area. Within this area, there are no walls over 8 ft. in height and the surrounding buildings are, as state, low-rise.

CC-6-61

City Request:

The EIR must be revised to address the compatibility of the new retaining/sound walls with the visual character of the surrounding areas. In addition, the City request mitigation measures be added to soften the visual impact of massive retaining/sound walls. Landscaping, public art, decorative block, and similar decorative treatment should be added to the retaining walls to make them visually and aesthetically pleasing.

4. ***Page 4-197*** – On this page under "Paramount MSF Site Option and Bellflower MSF Site Option," illumination of the site will be on a 24-hour bases. Immediately adjacent to the Bellflower MSF are residential uses.

CC-6-62

City Request:

In addition to shielding methods, the City requests additional mitigation measures for lighting, such as dense landscaping, to prevent the spill over of light onto neighboring residential properties. CC-6-62

Section 14 – Closing Comments

The City of Bellflower acknowledges the efforts of Metro and its team and is in general support of the development of the West Santa Ana Branch transit corridor project. However, the City urges Metro to closely consider and address the City's concerns in order to ensure the project is developed with appropriate mitigations. CC-6-63

We appreciate having an opportunity to comment on the Draft WSAB EIR/EIS and will continue to work with staff on the design, construction and mitigation of this project. If you have any questions, you can contact our Assistant City Manager/Director of Public Works, Len Gorecki at lgorecki@bellflower.org.

Sincerely,

Jeffrey L. Stewart
City Manager

City of Bellflower – CC-6

Comment ID	Response
CC-6-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-6-2	See response CR-GEN-1 regarding identification of the Locally Preferred Alternative (LPA) and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo.
CC-6-3	The traffic analysis completed for the WSAB Project was based on forecasts to a horizon year of 2042. Increases in traffic for future development (i.e., after 2017) were accounted for at a regional level by applying growth rates obtained from the Metro Travel Demand Model (adapted from the Southern California Association of Governments model). Future developments like the Mayne Events Center & Los Angeles County Fire Museum are captured as ambient growth, which was developed from outputs from the Metro Travel Demand Model. The parking structure is not a trip generator. The results of the level-of-service analysis for intersections on Bellflower Boulevard is included in Chapter 3, Table 3.14 of the Draft EIS/EIR (intersection Nos. 86, 87, and 88). The Bellflower/Harvard intersection was not analyzed in the Draft EIS/EIR. It is an unsignalized intersection (one-way stop-controlled). However, it was included in the additional analysis undertaken by Metro to support coordination with the City of Bellflower (separate from the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* [Appendix D of the Draft EIS/EIR]). That analysis focused on additional intersections in Bellflower, as requested by the City. Traffic operations were found to be acceptable. The Bellflower/Mayne intersection was analyzed as signalized in the Draft EIS/EIR (intersection No. 87 in Table 3.14). As shown in that table, the Project will not result in an adverse effect at that intersection and mitigation is not required.
CC-6-4	Updated parking surveys were conducted during non-holiday weekdays in January, March, and May 2023 on Tuesdays, Wednesdays, and Thursdays between the hours of 6:30 a.m. and 8:30 a.m. and 11:00 a.m. and 2:00 p.m. The survey time periods were determined based on the surrounding land uses and considered parking restrictions in each neighborhood. The updated field survey is summarized in Section 4.5.1.4 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* that corresponds to the Final EIS/EIR. Table 4.49 provides an updated summary of the field review of parking availability in the vicinity of the station. The number and type of parking spaces, including existing restrictions, in each block around the location, along with an assessment of available spaces (based on the field observation), are provided. The visual survey map is included in Appendix A of the report. On-street parking loss due to implementation of LPA will not result in the on-street parking supply to decrease below demand within the City of Bellflower, and adverse impacts were not identified.

Comment ID	Response
CC-6-5	As explained in Section 3.4.1 of the Draft EIS/EIR, the Bellflower maintenance and storage facility (MSF) site is similar in purpose and operation to the Metro Division 22 maintenance facility in the City of Lawndale. To determine traffic volumes for the WSAB Project MSF site, driveway traffic counts were conducted at Metro Division 22. The driveway counts were then used to establish a peak hour trip generation rate for the WSAB Project MSF site. However, the surrounding uses and conditions of the Division 22 maintenance facility were not used as a basis of the analysis of community effects for the Bellflower MSF. Site conditions, surrounding land uses, and surrounding community that are specific to the Bellflower MSF site were used to evaluate impacts of the Bellflower MSF site throughout the Draft EIS/EIR, including transportation, land use, neighborhoods, and communities. Metro has previously coordinated with the City of Bellflower regarding the design and site plan for the Bellflower MSF. Metro will continue to work with City of Bellflower staff to accommodate a future city open space on the parcel where the MSF will be located, with this future open space to be designed, environmentally cleared, and maintained by the City.
CC-6-6	Applicable and feasible mitigation measures have been applied where impacts were identified. Examples of these measures include soundwalls, low impact frogs to reduce crossover noise, and traction power substation (TPSS) noise reduction measures. The Draft EIS/EIR included Mitigation Measures NOI-4 (Crossing Signal Bells) and NOI-5 (Gate-Down-Bell-Stop Variance), which were recommended to further reduce noise at grade crossings, but require the approval of the California Public Utilities Commission (CPUC). Thus, while they were identified as mitigation measures in the Draft EIS/EIR, the benefits they provide were not included as part of the mitigated analysis in the Draft EIS/EIR in case they could not be implemented. Based on Metro's experience successfully implementing bell shrouds and gate-down-bell stop variances on other transit lines and coordination with CPUC subsequent to circulation of the Draft EIS/EIR, NOI-4 (Crossing Signal Bells) and NOI-5 (Gate-Down-Bell-Stop Variance) have now been incorporated as Project Measures (NOI PM-1 and NOI PM-2, respectively) within the Final EIS/EIR and the associated reductions are included in the analysis of noise impacts associated with the LPA. The project measures will be equally as effective as the NOI-4 (Crossing Signal Bells) and NOI-5 (Gate-Down-Bell-Stop Variance). Project Measures NOI PM-1 (Crossing Signal Bells) and NOI-PM-2 (Gate-Down-Bell-Stop Variance) remain subject to CPUC approval. Other measures such as resilient wheels/damped wheels only provide minor reductions in noise and are intended for reduction of noise at sharp curves. Additional analysis has been prepared since the Draft EIS/EIR to identify possible additional noise reduction measures for the LPA, beyond the inclusion of Project Measures NOI PM-1 and NOI PM-2. The noise analysis in Section 4.7.3 and 4.7.4 of the Final EIS/EIR incorporates additional analysis completed for the LPA since the Draft EIS/EIR to identify possible additional noise reductions. After implementation of both project measures and mitigation measures, operation of the LPA will result in 8 moderate impacts and 1 severe impact in the City of Bellflower. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Report* (previously Appendix M of the Draft EIS/EIR). Residual noise impacts have been reduced since the Draft EIS/EIR.

Comment ID	Response
CC-6-7	Subsequent to the Draft EIS/EIR, Metro coordinated with the City of Bellflower regarding the High Capacity Well Number 1 to determine if there would be adverse effects that were not identified in the Draft EIS/EIR. A groundborne vibration assessment was completed at High-Capacity Well Number 1. Vibration levels during operation will be less than levels during construction; therefore, only construction levels were analyzed quantitatively. As documented in Section 4.19.3.7 of the Final EIS/EIR, vibration levels at the City of Bellflower underground High Capacity Well No. 1 will not exceed the 2.0 in/sec PPV damage risk criteria appropriate for underground utilities. Although no adverse impacts are expected, an additional project measure was included in the Final EIS/EIR (VIB PM-1: City of Bellflower Vibration Sensitive Facilities), described in Section 4.19.3.7, limiting high-vibration construction activities near High-Capacity Well Number 1.
CC-6-8	The comment regarding project goals and values consistent with CEQA and NEPA is acknowledged. Responses to specific comments are provided as follows.
CC-6-9	The Bellflower MSF will not affect the Flora Vista Dog Park, which is located on the southern corner along the west boundary of the MSF site. Figure 2-31 in Chapter 2, Section 2.5.3.2 of the Draft EIS/EIR shows that access to the Bellflower MSF site will be from Somerset Boulevard and not from any other surrounding street. Figure 2-31 is a proposed layout of the MSF site and does not show detailed landscape setbacks; however, barriers and landscaping will be included in the design of the MSF site as design advances. As discussed in Chapter 4, Section 4.1.3.6 of the Draft EIS/EIR, design of the Bellflower MSF site "would follow MRDC guidance or equivalent criteria and would include barriers around the perimeter of the site to minimize potential adverse effects to surrounding land uses." In addition, Project Measure VA-5 (Landscaping at Bellflower MSF Site Option) discussed in Chapter 4, Section 4.4.4.1 of the Draft EIS/EIR, states that "[a]t the Bellflower MSF site option, existing landscaping and barriers facing residential areas would either remain in place or would be replaced with other types of landscaping and barriers that would obstruct views of the Bellflower MSF site option from residential areas."
CC-6-10	See response to comment CC-6-5. Each topic in Chapters 3 and 4 of the Draft EIS/EIR included a subsection focused on the analysis of the Bellflower MSF. Mitigation was identified as needed for impacts identified pursuant to NEPA and CEQA. The Bellflower MSF site has been designed to limit adverse effects on the surrounding neighborhoods. Project Measure VA PM-5 (Landscaping at Bellflower MSF Site Option) is integrated into the design of the Bellflower MSF to obstruct views of the Bellflower MSF site from adjacent residential areas. The Draft EIS/EIR assesses and explains how operation and construction of the Bellflower MSF site will not result in adverse effects for all analyzed environmental topic areas. Refer to CC-6-9 for additional information regarding landscaping at the MSF.
CC-6-11	See response to comment CC-6-5. References and similarity comparisons to the Metro Division 22 MSF in Lawndale were specific to the traffic analysis, as traffic counts from the Lawndale site were used to inform the traffic analysis for the Bellflower MSF. The Metro Division 22 MSF site in Lawndale was not repeatedly referenced in the Draft EIS/EIR, and other comparisons to this facility were not made. Per the city's request, and as noted in Chapter 2, Section 2.4.3.2 of the Final EIS/EIR, the design of the MSF has been refined to realign the MSF site entrance on Somerset Boulevard to align with Bayou Avenue to allow for signalization of an existing crosswalk across Somerset Boulevard. This design is included in the Final EIS/EIR. The refinement to the MSF was included in the analysis in the Final EIS/EIR and does not alter the impact conclusions contained in the Draft EIS/EIR. Metro will continue to coordinate with City of Bellflower staff regarding the design and site plan for the MSF facility.

Comment ID	Response
CC-6-12	See response to comment CC-6-4.
CC-6-13	See response to comment CC-6-4 and response CR-TRA-1 regarding spillover parking.
CC-6-14	The left-turn from westbound Alondra Boulevard to southbound Pacific Avenue is constrained by the geometry and raised median needed for the gate arm. Even if the site conditions could accommodate a left turn, maintaining left turns at that location could result in potential safety issues given the proximity of the turn to the at-grade crossing. The alternative route for westbound Alondra Boulevard to access Pacific Avenue is via a left turn to southbound Clark Avenue and then a left turn via Harvard Street or other streets to the south. While there will be a slight increase in travel distance, overall safety will likely be improved. Metro coordinated with the City of Bellflower in support of this comment in meetings in 2022. During these meetings, Metro explained why the left turn could not be maintained on westbound Alondra Boulevard. As a result of the coordination, a dedicated left-turn lane and a new traffic signal will be added on Clark Avenue at Los Angeles Street. This location was selected by the City of Bellflower. The traffic signal is included as Project Measure TR PM-8 in Section 3.5.1 in Chapter 3 of the Final EIS/EIR and in Section 8.1.1 in Chapter 8 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report.*
CC-6-15	An alternate haul route along Alondra Boulevard and I-605 has been identified for the construction staging area along Bellflower Boulevard. Chapter 3, Section 3.7.1 of the Final EIS/EIR and Section 7.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* and the *West Santa Ana Branch Transit Corridor Project Final Construction Methods Report* have been updated to reflect the revised haul route. These revisions were included in the analysis in the Final EIS/EIR and do not affect the environmental conclusions of the Draft EIS/EIR.
CC-6-16	After discussions with the City of Bellflower staff in 2022, the site plan for the MSF was updated to relocate the existing crosswalk to the new MSF vehicle driveway relocated across Bayou Avenue. At the City's request, this intersection will be signalized as part of the Project. The traffic signal is not required as mitigation. The realignment of the driveway and inclusion of the traffic signal are included as Project Measure TR PM-7 in Chapter 8, Section 8.1.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* and in Chapter 3, Section 3.5.1 of the Final EIS/EIR. See also Plan Sheet T-008 in Appendix B for the intersection drawing at this location. These project refinements were included in the analysis in the Final EIS/EIR and do not affect the environmental conclusions of the Draft EIS/EIR.
CC-6-17	The "Affected Area" and "Surrounding Area" column of Table 4.1.2 in the Final EIS/EIR and Table 4.2 of the *West Santa Ana Branch Transit Corridor Project Final Land Use Impact Analysis Report* (previously Appendix E of the Draft EIS/EIR) have been updated to include the land uses identified by the commentor. The "Surrounding Area" column of the tables does not indicate a blank column and is a merged row. The "Surrounding Area" characterization of "Residential, Commercial, Industrial, Open Space, Institutional/Public Facilities" is applicable to I-105/C Line, Paramount/Rosecrans, and Bellflower station areas. These revisions were included in the analysis in the Final EIS/EIR and do not affect the environmental conclusions of the Draft EIS/EIR.

Comment ID	Response
CC-6-18	The traffic analysis completed for the Project was documented in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D of the Draft EIS/EIR) and in Chapter 3 of the Draft EIS/EIR. In response to coordination with the City of Bellflower prior to release of the Draft EIS/EIR, additional analysis was completed that focused on intersections in Bellflower. Neither analysis indicated significant impacts on the intersections on Bellflower Boulevard related to traffic delay, or secondary effects related to queuing. The methodology used for the WSAB Project is similar to analysis methodologies applied on Metro's other most recent similar environmental study (Metro Gold Line Foothill Extension Phase 2B) and other transit projects.
CC-6-19	As summarized in Table 4.3.6 in Section 4.3.3, under the subheading "Residential Displacements," of the Draft EIS/EIR, the Project will not result in permanent residential displacements in the City of Bellflower. Table 4.2.4 of the Draft EIS/EIR under the subheading "Residences, Community Assets, or Commercial Businesses Permanently Acquired/Displaced" erroneously identified that the City of Bellflower would be affected by residential displacements, stating that "At multifamily residential on east side of Bellflower Blvd, north of project alignment, partial acquisition of 10 multifamily residential units for grade-crossing improvements. Displacement of 16 residents." Table 4.2.4 in Section 4.2.3.2, under the subheading "Community Cohesion," of the Final EIS/EIR has been updated to reflect the changes in the acquisition and displacement data for the LPA. Table 4.2.4 has been updated to delete the erroneous language regarding residential displacements in the City of Bellflower. Affected parcels within the City of Bellflower do not contain residential uses. The LPA will permanently impact six parcels in the City of Bellflower; three permanent full acquisitions will be required to accommodate the Bellflower MSF and parking facility and four permanent partial acquisitions will be required for an access road, grade crossings, and TPSS. Approximately four parcels will be affected by construction activities; one permanent full acquisition for a construction laydown area (that will also be used as the site for the Bellflower Station) and three temporary construction easements. It should be noted that "parcels" is not a total sum of the full and partial acquisitions. More than one partial acquisition may occur on a single parcel. See response CR-DIS-2 regarding updates to the acquisition and displacement data for the LPA.
CC-6-20	As the result of the low traffic generation (23 vehicle trips in the AM peak and 26 vehicle trips in the PM peak) associated with the Bellflower MSF, this intersection was not included in the traffic impact analysis, given that the impacts to the surrounding streets will be minimal. See response to comments CC-6-11 and CC-6-16 regarding access to the Bellflower MSF.
CC-6-21	See response to comment CC-6-19.
CC-6-22	Table 4.4.1 in Chapter 4, Section 4.4.2.2 of the Draft EIS/EIR lists scenic resources within the Affected Area, which "encompasses localized viewsheds, including the areas encompassing the proposed alignments and stations, areas that will be acquired for Project-related infrastructure (including TPSS, parking facilities, and MSF), adjacent parcels, any additional parcels that will have views of and across the proposed alignments and Project-related infrastructure, and adjacent street rights-of-way (ROWs) that parallel, intersect, or face the Build Alternatives." The Carpenter House Museum is located in an urban area surrounded by mature vegetation approximately 550 feet north of the project alignment. The Carpenter House Museum is not listed in Table 4.4.1 as it is not within the viewshed of the Pacific Electric Right-of-Way (PEROW). Views of the Carpenter House Museum are generally obstructed by landscaping between this scenic resource and the PEROW.

Comment ID	Response
CC-6-23	In response to this comment, subsequent to the Draft EIS/EIR, Metro coordinated with the Dante Valve Company to understand operational requirements and determine if there would be adverse effects on their operations that were not identified in the Draft EIS/EIR. An additional groundborne vibration assessment was completed at the Dante Valve Company. The assessment measured the existing vibration levels during normal operations at the test stand and CNC areas and predicted vibration levels from the construction of the trackwork and operation of the train passbys closest to these areas, including train operation associated with the tracks into the MSF. The results of the vibration assessment concluded that without mitigation, the predicted levels from the train operations through the crossover to the MSF of 77 VdB would exceed the existing vibration level at the test stand area. With a low impact crossover (Mitigation Measure VIB-2), the vibration levels will be reduced to 67 VdB, which is lower than the existing levels at the test stand area and CNC. Train operations on the tangent track would result in vibration levels of 72 VdB and would be lower than the existing vibration levels at the test stand area. Based on the analysis, operation of the LPA will not affect operations at the Dante Valve Company. Short-term vibration levels during construction would be below criteria protective of the facility and equipment. However, these vibration levels during construction immediately adjacent to the facility would exceed baseline levels measured at the test stand. Because the exact sensitivity of testing operations was not defined by Dante Valve Company and could not be otherwise established, testing could be limited during the limited period of construction immediately adjacent to the facility.
CC-6-24	Refer to response to comment CC-6-6 regarding the updated noise analysis that is documented in the Final EIS/EIR. See also responses CR-GEN-5 regarding implementation and recommendation of feasible mitigation measures and CR-NOI-1 regarding noise impacts analysis and proposed mitigation measures to reduce noise levels.
CC-6-25	Refer to the response to comment CC-6-7 regarding vibration analysis for the City of Bellflower's High Capacity Water Well located at 9944 Flora Vista Street. This well has also been added to Chapter 4, Sections 4.11.2.4 and 4.11.3.3 and Figure 4.11-4 of the Final EIS/EIR. As summarized in Section 4.11.3.3, the existing grade and right-of-way will be maintained adjacent to the water well site boundary. Additional analysis also had been added to Chapter 4, Section 4.19.3.7 regarding vibration levels at the location of the City of Bellflower High Capacity Well No. 1. Upon evaluation of the existing facility's proximity to the light rail transit (LRT) alignment, no impacts to existing water resources will occur as a result of construction or operation of the Project.
CC-6-26	Section 2.1.2.4 in Chapter 2 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* has been updated to indicate that the Bellflower MSF is bounded by a mobile home community and industrial uses to the west, consistent with the description of land uses provided in Chapter 4, Section 4.1.3.4 of the Draft EIS/EIR. This text is included in Section 2.2.4 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report.*
CC-6-27	The rationale for using a common set of criteria was provided in Chapter 1, Section 1.5.10 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D of the Draft EIS/EIR). As explained therein, only the Cities of Los Angeles (Los Angeles Department of Transportation 2016), Paramount (2007), and LA County (1997) have defined procedures for determining traffic impacts. In addition, using different criteria across the corridor could result in inconsistent conclusions (e.g., the same delay difference could result in an impact in one jurisdiction and not in the other). The decision to first assess all approaches and then apply one uniform approach to analyze intersection impacts was determined to be the most consistent and reasonable. No changes to the Draft EIS/EIR are necessary.

Comment ID	Response
CC-6-28	Noise monitoring was conducted throughout the corridor to establish a reasonable representation of different existing noise conditions for the various sensitive receptors. The Bristol Civic Auditorium and LA County Fire Museum were considered as part of the analysis. These uses are Category 3 uses, which are represented by short-term 1-hour L_{eq} noise levels per the FTA methodology. Long-term noise monitoring is not required at these locations because they do not have overnight use.
CC-6-29	The General Assessment considers the train vibration at various buildings along the project alignment. As described in Chapter 1, Section 1.5.5 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (Appendix M to the Draft EIS/EIR), the Federal Transit Administration (FTA) Guidance Manual defines the attenuation of different types of buildings, which is known as coupling loss. The vibration attenuation of smaller buildings is less than larger buildings. The building sizes and different foundations are referenced in the FTA Guidance Manual and used for this assessment. Chapter 1, Section 1.6.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* updated in support of the Final EIS/EIR discusses the inclusion of coupling loss in the vibration analysis and provides reference to the FTA Guidance Manual.
CC-6-30	Cluster N264 was incorrectly identified as a residential Category 2 land use in the Draft EIS/EIR. Review of the land use in 2023 indicates it is an Elks Lodge, which does not qualify as a sensitive receptor because it is not a use that requires quiet for study or meditation. The analysis was updated in Chapter 4, Section 4.7 of the Final EIS/EIR and in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* to identify the Mayne Events Center and the Los Angeles County Fire Museum as Cluster N348 with a designation as a Category 3 daytime institutional use. Cluster N266, which was previously identified as the LA County Fire Museum before construction of the new building, has been removed in the Final EIS/EIR. The Bellflower Public Works Facility is not a noise-sensitive use. The noise analysis shown in Figure 4.7.9 of the Final EIS/EIR has been updated to include the Mayne Events Center as N348 at its correct location. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report*. Predicted noise levels will be less than the FTA noise impact criteria at the Mayne Events Center (N348) and impacts would be less than significant.
CC-6-31	In the immediate vicinity of Caruthers Park, the Project will be located at grade within existing railroad or Metro rights-of-way. The Area of Potential Effects (APE) delineation methodology for the Project was developed through consultation among FTA, Metro, and the State Historic Preservation Officer (SHPO). In accordance with this approved methodology, in areas where the proposed alignment will be at-grade and within existing railroad or Metro ROWs, the APE was limited to the area of direct impact. In this case it is the existing railroad ROW because the introduction of a rail system in areas where a rail system functioned historically will not have an increased potential to cause indirect effects to historic properties. SHPO concurred with the methodology used to define the APE in a letter dated May 29, 2019. As a result, the property containing the Carpenter House, which encompasses Caruthers's Park, was excluded from the APE. It is acknowledged that the Carpenter House may constitute a historical resource. However, Carpenter House is located in an urban area surrounded by mature vegetation approximately 550 feet north of the project alignment. The property's existing setting and nature of the Project are such that the Project would not result in effects/impacts to the resource. No changes to the Section 4(f) and Section 6(f) evaluation are required.
CC-6-32	See response to comments CC-6-6 and C-6-24 regarding updates to the noise analysis.

Comment ID	Response
CC-6-33	Regarding NOI-1: Proposed soundwalls have been determined feasible based on design completed to date and will be constructed within the Metro ROW per the Metro Rail Design Criteria. Soundwalls were depicted on the LRT plans included as Appendix B to the Draft EIS/EIR. The locations of soundwalls have been updated since the Draft EIS/EIR to reflect design changes, and discussion of the noise analysis and the LRT plans in Appendix B of the Final EIS/EIR have been updated accordingly. Soundwalls that were deemed infeasible (e.g., at grade crossings) were not included in the analysis or proposed as mitigation. Metro has successfully implemented soundwalls along both at-grade rights-of-way and aerial structures for existing Metro LRT lines. Metro and FTA have reviewed the environmental document and found the mitigation identified to be feasible and appropriate. Regarding NOI-2: The low impact frogs will eliminate the "clickety-clack" noise associated with the crossovers, which is reflected in the noise model as a +5 dBA addition to affected receptors. The mitigation will reduce the overall LRT noise level by 5 dBA at receptors affected by crossovers. The specific locations where low impact frogs will be applied are shown Section 4.7.4.2 of the Draft EIS/EIR under Mitigation Measure NOI-2, with updates included in Section 4.7.4.2 of the Final EIS/EIR. Additional description of the low impact-frogs has been added to Section 1.6.1.13 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report*. Regarding NOI-4 (Crossing Signal Bells) and NOI-5 (Gate-Down-Bell-Stop Variance): Refer to the response to comment CC-6-6. In response to public and agency comments, additional analysis has been prepared since the Draft EIS/EIR to identify possible additional noise reduction measures and has been incorporated into Sections 4.7.3 and 4.7.4 of the Final EIS/EIR. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report*. Residual noise impacts have been reduced since the Draft EIS/EIR. The construction noise analysis was prepared to model typical anticipated scenarios and noise levels associated with the various construction phases/activity types. The FTA construction noise impact criteria were applied to provide a universal basis of analysis for the entire corridor, as many jurisdictions, including the City of Bellflower, have not established a quantitative standard for construction noise. An analysis of potential noise levels during construction of the Bellflower MSF is included in Chapter 4, Section 4.19.3.7 of the Draft EIS/EIR. As required by Final EIS/EIR Mitigation Measure NOI-6 (Noise Control Plan) (referred to as Mitigation Measure NOI-8 in the Draft EIS/EIR), the noise control plan will include measures to reduce construction noise that are routinely implemented on other construction projects, such as acoustical shields, high-performance muffler devices, temporary noise barriers, and the use of quieter electrical equipment. The mitigation measure also mandates construction noise monitoring to ensure compliance with the contract noise limits and to limit exceedances of construction noise criteria. Please see Chapter 4, Section 4.19.3.7 of the Draft EIS/EIR regarding impact conclusions for the Bellflower MSF. The Draft EIS/EIR concludes that construction noise impacts will be significant and unavoidable for the Bellflower MSF, similar to construction for the rest of the Project.

Comment ID	Response
CC-6-34	Section 4.19.3.7 of the Draft EIS/EIR includes a description of the type of equipment and noise levels that will occur for at-grade construction and at the MSF site. This section includes a description of possible noise levels that could be experienced by receptors adjacent to at-grade construction (91 dBA at 50 feet). The analysis also includes a discussion of noise levels at residences and Albert Baxter Elementary School surrounding the Bellflower MSF site. The analysis concludes that construction noise impacts will be significant and unavoidable. The construction noise analysis was prepared to model typical anticipated scenarios and noise levels associated with the various construction phases/activity types. Explicit details regarding construction scheduling and equipment are not available at this stage, and anticipated construction equipment for each activity is based on Metro's experience buildings other LRT transit lines. Construction along the alignment will not substantially vary and, therefore, mitigation can be applied throughout. The construction contractor will comply with the commitments included in the Draft and Final EIS/EIR when developing the construction schedule and determining construction means and methods. Refer also to the response to comment CC-6-33 regarding the construction noise analysis.
CC-6-35	Table 4.5.15 in Chapter 4, Section 4.5 of the Draft EIS/EIR quantified and disclosed emissions of air pollutants that will be generated during operation of the Bellflower MSF. Operational emissions from the Bellflower MSF will not exceed applicable regional or localized significance threshold for mass daily emissions established by the South Coast Air Quality Management District (SCAQMD). The LRT will be electrically powered and will not generate fuel combustion emissions. Minimal emissions of particulate matter will be generated by the LRT vehicle braking mechanisms, but these emissions would be of such miniscule magnitude that there would be no possibility of significant localized air quality impacts. The SCAQMD operational concentration-based localized significance threshold (LST) for PM_{10} and $PM_{2.5}$ is an incremental increase of 2.5 micrograms per cubic meter (2.5 $\mu g/m^3$) averaged over 24 hours. The minimum operational mass-based emissions LSTs for PM_{10} and $PM_{2.5}$ in the project area are 4 and 1 pounds per day, respectively. There is no potential for brake wear emissions from rail vehicles along the LPA alignment to generate emissions near such levels, and the emissions would represent small fractions of those LST screening values. Additionally, the braking emissions would be intermittent and would only occur during the brief period when a train would be passing by, and would be quickly dispersed by wind. Therefore, emissions were adequately quantified and disclosed in the Draft EIS/EIR. The SCAQMD Localized Significance Threshold Methodology was designed to provide a screening process for evaluating whether pollutant concentrations surrounding small-scale sources of air pollutants could reach levels approaching the ambient air quality standards and possibly present public health concerns, warranting further analysis. As shown in Chapter 4, Table 4.5.15, in the Draft EIS/EIR, operation of the Bellflower MSF will not generate emissions of nitrogen oxides (NO_X), carbon monoxide (CO), or particulate matter (PM_{10} and $PM_{2.5}$) that will approach the LST screening values established by the SCAQMD for a project of its size in close proximity to sensitive receptors. Therefore, sensitive receptors near the MSF site in Bellflower will not risk being exposed to concentrations of air pollutants that could create or exacerbate adverse health effects. The air quality analysis was updated for the Final EIS/EIR; however, the impact conclusions remain unchanged. Refer to Chapter 4, Section 4.5 for the updated air quality analysis.

Comment ID	Response
CC-6-36	Table 4.19.12 and Table 4.19.19 in Chapter 4, Section 4.19 of the Draft EIS/EIR quantified and disclosed emissions of air pollutants that will be generated during construction of the Bellflower MSF. Results of the regional-scale analysis presented in Chapter 4, Table 4.19.12 of the Draft EIS/EIR demonstrated that maximum daily emissions of reactive organic gases, CO, NO_X, sulfur oxides, and PM_{10} and $PM_{2.5}$ will all remain substantially below the corresponding regional SCAQMD air quality significance threshold for mass daily emissions (i.e., emissions will not reach half of the applicable thresholds for any pollutant). By producing emissions that remain below the regional thresholds, construction of the Bellflower MSF will not result in air quality violations. Table 4.19.19 in Chapter 4, Section 4.19 of the Draft EIS/EIR provided a localized analysis of emissions that will be generated by sources located on the MSF construction site. The LST screening values were derived by the SCAQMD using ambient air quality data from the 2002–2004 monitoring period and dispersion modeling of emissions from construction sites to prevent the occurrence of ambient air quality standards being exceeded, thereby precluding potential health concerns to nearby sensitive receptors. As shown in Table 4.19.19 of the Draft EIS/EIR, construction of the Bellflower MSF will not produce emissions in excess of any corresponding LST value given the size of the construction site and the proximity of sensitive receptors. Construction of the Bellflower MSF will also be bound to the requirements of Metro's Green Construction Policy, which requires the use of heavy-duty equipment outfitted with engines meeting the Tier 4 final emissions standards. Therefore, construction of the Bellflower MSF will not present public health concerns related to air quality for nearby residents. The construction-related air quality analysis was updated for the Final EIS/EIR to reflect updates to the construction schedule; however, the impact conclusions remain unchanged. Refer to Chapter 4, Section 4.19.3.5 for the updated air quality analysis.
CC-6-37	In accordance with National Register of Historic Places and California Register of Historical Resources guidance, properties eligible for either register generally meet a 50-year age threshold and possess historical or architectural significance. The cultural resources analysis conducted for the Project considered the potential historical significance of properties and associated built environment features in the APE that were constructed more than 50 years from the anticipated project construction date of 2028 (i.e., those constructed in 1978 and prior). To account for changes in the project schedule, the analysis additionally surveyed and screened all properties in the APE constructed between 1979 and 1989 (50 years from an construction completion date of 2034 plus a 5-year buffer). A review of historical aerial images indicates that the Bellflower fountain, bike trail, and associated signage referenced in the comment were constructed ca. 2009. As they do not meet the federal or state minimum age requirements for inclusion in the NRHP or CRHR, their potential historical significance was not further considered in the analysis. The historical significance and potential impacts/effects of the Project on the Bellflower Pacific Electric Railway Depot and the older house at 10040 Flora Vista Street are discussed in detail in the Cultural Resources Survey Report–Rev 2 and Revised Final Cultural Resources Effects Report prepared in support the EIS/EIR. The Project would result in no adverse effect to either historic property under Section 106 and no impact under CEQA.

Comment ID	Response
CC-6-38	Impacts to water quality are addressed in Chapter 4, Section 4.11.3 of the Draft EIS/EIR. As discussed In Section 4.11.3.1, the *West Santa Ana Branch Transit Corridor Project Environmental Study, Sustainability Stormwater Study – Revision 1* was developed to evaluate the feasibility of capturing and managing stormwater and associated pollutants, prioritize projects for future implementation, and identify stormwater-related sustainability features and strategies along the project alignment to support Metro sustainability goals and to comply with stormwater quality regulations. The study provides recommendations for site design and LID stormwater BMP implementation locations along the project alignment. Specific biofiltration swale designs, including vegetation, depths, etc., will be determined during the final design phase. These BMPs will maintain pre-development flow volumes, peak flow rates, and times of concentration, and will avoid and minimize adverse effects to water quality and water resources.
CC-6-39	The traffic analysis was conducted using Synchro and SimTraffic, the companion simulation tool. The text was updated in Chapter 1, Section 1.5.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* and Chapter 3, Section 3.2.1 of the Final EIS/EIR to clarify that both tools were used. SimTraffic allows for the modeling of at-grade crossings, and considers the coordination effects of adjacent signals. It is a stochastic (random) process to simulate the vehicular traffic on roads, and there are different results with each run. To account for the variations, five SimTraffic runs were conducted, and the average of the results was reported. Signal timing plans in Synchro/SimTraffic were developed by considering existing conditions phasing and then optimizing timing for future traffic volumes and any geometric configuration changes. The Bellflower/Harvard, Bellflower/Flower, and Bellflower/Belmont intersections were not included in the traffic analysis. These intersections have lower volumes and are farther from the at-grade crossing. However, these intersections were evaluated in the additional analysis conducted in support of coordination with the City of Bellflower and no impacts were identified. Split phasing was used in the traffic analysis at the Bellflower/Oak intersection but not at Bellflower/Mayne. Refer to responses to comments CC-11-09 and CC-11-10 for additional information regarding the application of the Synchro and SimTraffic software.
CC-6-40	The queueing vehicle analysis summary has been tabulated to best summarize the results. The queueing analysis was conducted at the at-grade crossings using SimTraffic and summarized in Table 5.5 in Chapter 5 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. The analysis focuses on the queuing on the main street (i.e., Bellflower Boulevard) and not secondary queuing on the side streets (i.e., Mayne Street). That approach best captured the most critical impact of train crossing queues affecting adjacent intersections. Impacts on the side streets are captured with the level-of-service (LOS) analysis, also conducted with SimTraffic. Traffic counts were collected in early 2017. In the City of Bellflower, the upcoming AltAir project would be located closest to the planned MSF, south of Somerset Boulevard. As stated in response to comment CC-6-3, the traffic analysis was conducted for a 2042 horizon year, with increases in traffic developed by obtaining growth rates from the Metro Travel Demand Model. The AltAir project would be considered as the horizon year No Build Alternative traffic volumes to which project volumes were then added. Because the traffic analysis for the Project considered growth of traffic, in addition to increases in project-related vehicular trips accessing stations, it is cumulative by nature. Refer to the response to comment CC-6-20 regarding the traffic analysis for the MSF.

Comment ID	Response
CC-6-41	See response to comment CC-6-4. The parking Affected Area is 0.25 mile around each station, along streets immediately adjacent to the Project and other project features, and off-street parking lots where permanent easements or acquisitions are required for the Project. As noted in Table 3.8 of the Draft EIS/EIR, in some cases a smaller or larger area was surveyed to determine parking supply and utilization based on existing characteristics and constraints that could influence the distance an individual may walk from a parking space.
CC-6-42	The vibration analysis was conducted consistent with FTA Noise and Vibration Guidelines. See response to comment CC-6-23 regarding additional vibration analysis at the specific property mentioned in this comment.
CC-6-43	The delay of 420 seconds/vehicle at the Alondra/Flora Vista is for Alternative 2 without mitigation in the AM peak; this analysis was also applicable to Alternative 3. With Mitigation Measure TRA-17 (Alondra Boulevard/ Flora Vista Street) from the Draft EIS/EIR, delay will be reduced to 30.8 seconds/vehicle. Similarly, the maximum delay with Mitigation Measure TRA-15 (Flora Vista Street/Clark Avenue) at Flora Vista/Clark is 12 seconds and it is 49 seconds/vehicle at Alondra/Clark (Mitigation Measure TRA-16). LOS and delay with mitigation are included in Table 3.44 in Chapter 3 of the Draft EIS/EIR. The length of the queues at the intersections referenced in the comment are provided in Table 5.5 in Chapter 5 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. The text in the impact report has been revised to clarify that the queue cutters and/or pre-signals will minimize the effects of the queues, not the queues themselves.
CC-6-44	Chapter 3 of the Draft EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* do not identify adverse effects at any of the intersections noted in the comment. Table 3.16 in Chapter 3 of the Draft EIS/EIR identified impacts for Alternative 4. The intersections mentioned in the comment also appear in Table 3.15, which provides the summary of impact analysis for Alternative 3. As shown in this table, there will not be adverse effects at these intersections with Alternative 3. The LOS analysis is included in Table 3.14 of the Draft EIS/EIR.
CC-6-45	See response CR-TRA-1 regarding spillover parking and response to comment CC-6-4. Implementation of the LPA will require the loss of on-street parking in the City of Bellflower, as outlined in Table 3.18 of the Final EIS/EIR. At these locations, the overall parking supply will not decrease below the observed demand, and impacts would not be adverse.

Comment ID	Response
CC-6-46	Lane modifications required to accommodate at-grade crossings are provided in the design plans in Appendix B to the Draft EIS/EIR with updates included in Appendix B of the Final EIS/EIR. Lane modifications in the City of Bellflower will be generally limited to the addition of center islands for crossing gates and pedestrian crossing equipment. Although not related to at-grade crossings, a southbound dedicated left-turn lane has been added along Clark Avenue at Los Angeles Street to preserve dedicated turning movements into the residential neighborhood east of Clark Avenue. Additionally, a westbound dedicated right-turn lane has been added along Somerset Boulevard at Bayou Avenue to allow for dedicated ingress into the MSF. Both of these refinements were identified in consultation with the City of Bellflower. Westbound and eastbound left-turning pockets along Alondra Boulevard at Clark Avenue will also be extended as a traffic mitigation measure (Final EIS/EIR Mitigation Measure TRA-15), pending city approval. Refer to Grade Crossing Plan Sheets CS-210 through CS-213 and Intersection Sheets T-008 through T-010 in Appendix B for drawings detailing lane modifications within the City of Bellflower. In the Draft EIS/EIR, Project Measures TR PM-3 through TR PM-9 in Chapter 3, Section 3.5.1 identified specific modifications to roadways or intersections needed to accommodate the Project. Project measures have been updated for the Final EIS/EIR; refer to Project Measures TR PM-3 through TR PM-10 in Chapter 3, Section 3.5.1 regarding roadway and intersection modifications for the LPA.
CC-6-47	Section 3.5.1 in Chapter 3 of the Draft EIS/EIR identifies the streets that will be closed to accommodate the LPA. This information has been updated for the Final EIS/EIR in response to stakeholder coordination and comments received on the Draft EIS/EIR, with updated information provided in Chapter 3, Section 3.4.1.2. No streets in the City of Bellflower will be closed.
CC-6-48	The City will be consulted as design advances and traffic signaling plans are developed for the Project. Metro will coordinate with city staff per an executed Master Cooperative Agreement, which will provide the City with the opportunity to review design packages and provide comments.
CC-6-49	The prohibition of left turns from westbound Alondra Boulevard to southbound Pacific Avenue was addressed in the response to comment CC-6-14. Right turns from eastbound Alondra to southbound Pacific will still be permitted. The left turn from northbound Pacific to westbound Alondra is constrained by the geometry and raised median needed for the crossing gate arm. As shown in Chapter 3, Table 3.14 in the Draft EIS/EIR, the Project will not have an adverse effect in either the AM or PM peak periods at Alondra Boulevard and Pacific Avenue (Intersection 83). Westbound left-turn and northbound left-turn traffic at Alondra Boulevard and Pacific Avenue will be rerouted through Alondra Boulevard and Clark Avenue, which will result in an adverse impact at the intersection (Intersection 82). Draft EIS/EIR Mitigation Measure TRA-16 was identified at Alondra Boulevard and Clark Avenue, which will extend the eastbound and westbound left turns, and the delay will decrease such that there will not be an adverse impact after mitigation. The LOS and delay with mitigation are shown in Table 3.44 in the Draft EIS/EIR.
CC-6-50	Draft EIS/EIR Mitigation Measure TRA-21 (Parking Monitoring and Community Outreach) (referred to as Mitigation Measure TRA-19 in the Final EIS/EIR) relates to the potential for a change in parking demand around stations as a result of operation of the Project. Mitigation Measure TRA-19 provides a variety of options that could be implemented if the demand for parking increases by 20 percent or more after opening of the Project. The nature of the program will likely vary by jurisdiction and location within that jurisdiction. Any changes to parking management, including permit programs or restriping, will be subject to approval by the City. Refer to CR-TRA-1 for additional information regarding this mitigation measure. Mitigation Measure TRA-16 is referred to as TRA-15 in the Final EIS/EIR; however, the measure itself is unchanged.

Comment ID	Response
CC-6-51	Draft EIS/EIR Mitigation Measure TRA-22 (Parking Management Plan [Permanent]) (referred to as Mitigation Measure TRA-20 in the Final EIS/EIR) provides potential ways to minimize parking loss. This measure addresses the physical loss of parking that will result from implementation of the LPA. Angled parking is an example of a method to replace lost parking, but is not the only method that may be used. The specific methods to offset parking loss will vary by jurisdiction, and potentially location within the jurisdiction, and be selected in coordination with representatives of that jurisdiction.
CC-6-52	Mitigation Measure COM-1 (Construction Outreach Plan) commits Metro to developing a Construction Outreach Plan in coordination with affected communities and businesses that will be affected by construction. Guidelines and eligibility for Metro's Pilot Business Interruption Fund are set by Metro's Board of Directors. At present, the Metro Board of Directors has not approved the Business Interruption Fund for this Project. When and if the Metro Board of Directors considers a Business Interruption Fund for this Project, questions about eligibility, scope, and administration can be addressed.
CC-6-53	Metro will work with each jurisdiction to determine the specific measures that will be applicable to minimize parking loss during construction, to the extent feasible and practicable. The Draft EIS/EIR assumed that parking impacts could remain as mitigation may not be feasible to offset all parking lost during construction, thereby resulting in adverse impacts after mitigation.
CC-6-54	Refer to the response to comment CC-6-51.
CC-6-55	Project consistency with the applicable goals and policies of the City of Bellflower General Plan is included in Table 5.19 in Chapter 5 of the *West Santa Ana Branch Transit Corridor Project Final Land Use Impact Analysis Report* (Appendix E of the Draft EIS/EIR). Chapter 5, Section 5.2.2 of the *West Santa Ana Branch Transit Corridor Project Final Land Use Impact Analysis Report* has been updated to include a land use consistency analysis of applicable goals and policies from the Downtown Bellflower Transit Oriented Development Specific Plan. Sections 4.1.1.1, 4.1.3.1, and 4.1.3.2 in Chapter 4 of the Final EIS/EIR have been updated to include the Downtown Bellflower Transit Oriented Development Specific Plan.
CC-6-56	Metro will consider columns in place of retained fill as design advances. Metro has coordinated, and continues to coordinate, with the City of Bellflower as it relates to project design. Metro will continue to coordinate with city staff per an executed Master Cooperative Agreement, which will provide the City of Bellflower the opportunity to review design packages and provide comments.
CC-6-57	The discussion in Chapter 4, Section 4.1.3.6 is further detailed in the *West Santa Ana Branch Transit Corridor Project Draft Section 4(f) and Section 6(f) Evaluation* (Appendix BB to the Draft EIS/EIR). Specifically, as stated in Chapter 4, Section 4.2.19 of the *West Santa Ana Branch Transit Corridor Project Draft Section 4(f) and Section 6(f) Evaluation*, the classification of the MSF site was based on a letter from the City of Bellflower dated March 11, 2021, that stated "The City has not designated these parcels as significant park or recreation areas, nor identified HSP [Hollywood Sports Park] operation as having an important role in meeting the park and recreation objectives of the City." At a meeting on April 19, 2022, City staff clarified that the March 11, 2021, letter remains valid and that the parcels are not significant park or recreation areas. The March 11, 2021, letter and a summary of the April 19, 2022, meeting are included in Appendix A to the *West Santa Ana Branch Transit Corridor Project Final Section 4(f) and 6(f) Evaluation*.
CC-6-58	See response to comment CC-6-19.

Comment ID	Response
CC-6-59	Chapter 4, Section 4.4.3.2 and Table 4.4.7 of the Final EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* (previously Appendix I to the Draft EIS/EIR) have been updated to address the south-facing views and the visual character of the Bellflower Station area. Project components will be new visual elements but will not detract from or obstruct south-facing views of the original Bellflower Pacific Electric Station. Similar visual elements are in the Affected Area (e.g., utility poles and lines, traffic signals, buses and other vehicles, and fencing). Additional landscaping will be installed along the Bellflower Bike Trail, which will enhance views in this area.
CC-6-60	The walls will not be 36 feet in height. The aerial structure will be up to 32 feet in height at its tallest point with 4-foot soundwalls on top of the aerial structure. Additionally, near residential properties, 4-foot-tall privacy screening will be added on top of the soundwalls to block views into residential properties. The total height of the structure (36 feet with soundwalls, and 40 feet with soundwalls and privacy screening) will be at a similar scale as the two-story buildings on the south side of the PEROW at Woodruff Avenue/Flower Street/Flora Vista Street. It should be noted that a four-story structure (the Bellflower Courthouse) is also located in this area (just west of the proposed aerial structure). Between Flower Street and Woodruff Avenue (adjacent to the two-story residences), the aerial structure will be supported by columns. The retaining walls will be to the northwest of Flower Street/Flora Vista Street and to the southeast of Woodruff Avenue/Flora Vista Street. Additionally, the retaining walls, at their tallest point, will be approximately 25 feet in height. The retaining walls will follow the Metro Rail Design Criteria or equivalent criteria, which requires the use of landscaping on retaining walls, as appropriate, which will soften the view and enhance the aesthetics of the walls. Retaining walls will also follow the *West Santa Ana Branch Transit Corridor Project Urban Design Guide,* which will incorporate landscaping on or along the walls that includes vines or a landscape buffer where there is adequate space to improve the aesthetic quality of the transit environment.
CC-6-61	See response to comment CC-6-60.
CC-6-62	Dense landscaping already exists in the area adjacent to residential properties. As stated in Chapter 4, Section 4.4.3.7 of the Draft EIS/EIR, "Tall trees and vines along the easterly perimeter of the MSF site currently obstruct views of the site from a residential neighborhood. Existing vegetation along the northerly and southerly perimeters of this MSF site option (along Somerset Boulevard and PEROW, respectively) partially obstruct views of this MSF site option. The existing landscaping and barriers along the perimeter of the Bellflower MSF site option would either remain or be replaced with other types of landscaping and barriers that would obstruct views of this MSF site option from the surrounding residential uses. As a result, viewer groups would have little to no reaction to changes associated with the Bellflower MSF site option. Changes in visual quality would be neutral since the visual character of the area, nighttime lighting levels, and sources of glare would be consistent and compatible with the existing visual character of the Affected Area. Viewer groups would have little to no reaction to the proposed changes due to the mixed commercial, industrial, and residential character of the Affected Area, as well as the landscaping and barriers that obstruct views of the MSF site option. The landscaping and barriers would also limit the amount of light that would spill over onto nearby properties." As described in Chapter 4, Section 4.4.4.1 of the Draft EIS/EIR, Project Measure VA PM-5 (Landscaping at Bellflower MSF Site Option) requires that existing landscaping facing residential areas remain in place or be replaced. Therefore, mitigation is not required.

Comment ID	Response
CC-6-63	Metro continues to coordinate with partner jurisdictions. As documented in Chapter 7 of the Final EIS/EIR, Metro met with the City of Bellflower after circulation of the Draft EIS/EIR to discuss comments received from the City on the Draft EIS/EIR and to continue to refine project details. Specifically in response to coordination, the MSF site entrance on Somerset Boulevard was shifted to align with Bayou Avenue to allow for signalization of an existing crosswalk across Somerset Boulevard. Additionally, a protected left turn and a traffic signal were added on Clark Avenue at Los Angeles Street to accommodate access to the community. These refinements are included in the Final EIS/EIR, and the relevant analyses have been updated accordingly. These refinements do not alter the environmental conclusions of the Draft EIS/EIR. Refer to the response to comment CC-6-14 for additional information on the protected left turn and traffic signal at Clark Avenue and Los Angeles Street.

City of Bell Gardens

From: Grissel Chavez [gchavez@bellgardens.org]
Sent: 9/28/2021, 10:32 AM
To: wsab@metro.net
Cc: mkodama@eco-rapid.org; dbenash@infengr.com; firstdistrict@bos.lacounty.gov; vsanchez@bellgardens.org; fdutra@cityofwhittier.org
Subject: Comment letter from Bell Gardens re WSAB project

Hello. Please see attached letter from Mayor Barcena with the City of Bell Gardens.

Thank you for your time and review.

CC-7-1

Grissel Chavez

Director of Public Works

City of Bell Gardens

Office 562-806-7770

CITY OF BELL GARDENS
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September 27, 2021

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

Re: Comments West Santa Ana Branch Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report Ms. Khanna, Section 1 – Support Alternative 1, Design Option 2

The City of Bell Gardens has reviewed the West Santa Ana Branch (WSAB) Transit Corridor Draft Environmental Impact Report/Statement and supports the selection of Alternative 1 (Los Angeles Union Station to Pioneer Station) and Design Option 2 (Addition of Little Tokyo Station). CC-7-2

The City recognizes there is a need to create this light rail transit line and there is a challenge in obtaining the funding to build the project. For Bell Gardens and the surrounding communities in the Southeast Los Angeles region, this is also a question of fairness and equity. Being one in a region comprised of Environmental Justice communities that are adversely impacted by environmental and socioeconomic factors which affect the health, environment and quality of life of the local resident on a regular basis, the City of Bell Gardens requests fair treatment and to be given the same consideration as past Metro projects serving other more affluent areas of Los Angeles County. CC-7-3 As a Justice40 project, under the President Biden administration, we recognize the importance of moving forward quickly together to be able to secure the federal funding necessary to complete this environmentally friendly, sustainable and equitable transit project. To help ensure eligibility for this funding the Locally Preferred Alternative should be Alternative 1, Design Option 2 so that the entire line, all possible phases, has a CERTIFIED environmental analysis completed prior to availability of funds. The development of this corridor should be provided the same amenities as other transit corridors that are not considered EJ. CC-7-4 The entire WSAB Transit Corridor Study Area (as illustrated in Figure S-1. WSAB Transit Corridor Study Area) should be analyzed as an Environmental Justice (EJ) Corridor. Every impact in an EJ community that negatively changes the environment is significant.

The City of Bell Gardens has the below specific comments that need to be addressed to meet the community and system needs as required by environmental law: CC-7-5

1. The City of Bell Gardens requests it be included in all analysis as identified in the WSAB Transit Corridor Study Area map and the analysis in pages 1-4, 1-6 and 1-7. The EIR/EIS needs to include connectivity from the WSAB stations to Bell Gardens. Our community needs to be included in first mile/last mile analysis as described in the FTA/Metro/Eco-Rapid Transit/South Gate TOD SIP. CC-7-5

2. Impacts to the commercial corridors and businesses require a more robust mitigation program. The main streets will have significant impacts during construction that will need to be mitigated. Additional mitigation measures should also be developed and implemented to effectively address potential construction related/traffic impacts that will spill over to the Bell Gardens downtown area on Eastern Avenue, including the Bicycle Casino and Hotel. CC-7-6

3. Similarly, as stated in the Draft EIR/S, large portions of the project are in heavily industrial areas. The impacts to the movement of goods will result in the diversion of tractor trailers onto adjacent arterial and residential streets that are not designated for such traffic thereby resulting in adverse traffic impacts that are not addressed. Additionally, changes to the streets, freeway access, and turns all affect truck traffic—their ability to move through the area and the time it takes for them to travel through the impacted Study Area must be analyzed in greater detail. There needs to be discussions with cities about designating alternative truck routes so as to minimize impacts to the respective communities and local businesses to ensure their needs are met during construction and after operations commence. CC-7-7 CC-7-8

The following are specific comments by Section and Page CC-7-9

Page 1-9, Figure 1-4 Activity Centers - The figure and analysis is missing an important Bell Gardens activity center in the corri CC-7-9 n is the Bicycle Hotel and Casino in Bell Gardens.

Transportation Page 3-72. As with most cities in the southeast Los Angeles region, Bell Gardens is already faced with significant parking congestion and insufficient on-street parking supply. This item is of particular importance to the City to ensure the appropriate parking demand is provided to eliminate any negative spill-over impacts to Bell Gardens. Additional parking study to determine accurate parking demand is needed. Metro also needs to analyze the potential for joint development opportunities for all parking sites, the potential for satellite parking sites, and amenities for parking (and TOD development). Any additional parking demand uncovered in a more adequate parking study should be provided to prevent severely impacting transportation in the cities most in need of parking or drawing additional parking to station areas. CC-7-10 CC-7-11

Page 3-73 The parking analysis claims that the parking occupancy numbers were gathered during observations made during peak parking periods. According to information in the Appendix, the parking analysis in the corridor was conducted at various times Tuesday through Friday in September, 2017. The parking study should include morning, mid-day, afternoon and evening parking counts. It should be conducted on a weekday (Tuesday, Wednesday or Thursday) and weekend (Saturday or Sunday). It should account for specific local conditions and should include public and private parking in the station area (current and future) CC-7-12

Page 3-78 The statement that there will be no parking spillover because no transit parking is provided does not make sense and is not backed up by any parking analysis in this report. Use of street parking may still be considered as spillover and must be calculated and mitigated or the analysis is inadequate. CC-7-13 Page 3-105 Parking monitoring is not adequate. The parking monitoring system needs to be based upon a set of guiding parking principles agreed to by Metro and the local jurisdictions. It should be a comprehensive on and off-street parking analysis by block, station area and for the corridor. This allows use of parking resources at various stations to meet Metro parking demand. The monitoring system should be inclusive of all parking users and not focus only on Metro customers. It must include and not be limited to visitors, customers, employees, residents and Metro commuters. It must analyze and reduce potential parking spillover issues, especially in existing residential neighborhoods. Further, the City of Bell Gardens would like to emphasize that providing connectivity for our residents and businesses to the WSAB Line can also reduce parking demand and spillover in the station areas. This includes related improvements such as the NextGen bus program and first mile/last mile connections to and from Bell Gardens, especially east-west along Florence (over the 710 freeway) and Firestone. CC-7-14

Page 4-853 - Environmental Justice. The threshold definition of an environmental justice community must include quantifications and impacts to the human health of residents and workers in the cities identified in the study corridor. CC-7-15

Page 4-853 - Environmental Justice. The City of Bell Gardens was not included in the Environmental Justice analysis and is not considered affected by the project. Bell Gardens has been an active participant in the development of the WSAB project, was included in the Metro study corridor and needs to be included in all aspects of environmental review and analysis including the category of Environmental Justice. Connections between Bell Gardens and stations in Huntington Park and South Gate need to be analyzed and included in the design for the project. Excluding the city Bell Gardens is a significant negative impact to our environmental justice community. CC-7-16

Page 4-854 - Environmental Justice. Environmental Justice communities are also those communities exposed to greater numbers/amounts of toxic industry than other communities. Exposure to this type of industry and human health risks in general must be made a greater part of the environmental justice analysis in the document. CC-7-17

Page 4-866, figure 4.22-4 –Bell Gardens should be included on this map. Bell Gardens has a significant low-income, minority population. CC-7-18

The City of Bell Gardens urges Metro to consider, review and address our comments. The City acknowledges the efforts of Metro and its team and is in full support of the development of the West Santa Ana Branch light rail transit project, developed with appropriate mitigations and with a preference for the Artesia to Union Station alignment and a station in Little Tokyo (Alternative 1, Design Option 2). We appreciate having an opportunity to comment on the Draft WSAB EIR EIS and will continue to work with Eco-Rapid Transit and Metro to stay involved and show our support of the project. CC-7-19

If you have any questions, you can contact the Public Works Director, Grissel Chavez, at gchavez@bellgardens.org or call 562-806-7770.

Sincerely,

Marco Barcena
Mayor
City of Bell Gardens

City of Bell Gardens – CC-7

Comment ID	Response
CC-7-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-7-2	See response CR-GEN-1 regarding identification of the Locally Preferred Alternative (LPA) and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo.
CC-7-3	See response to comment CC-7-2 regarding identification of the LPA. Based on discussions with the Federal Transit Administration (FTA), the Record of Decision will be issued on the financially feasible alternative, which considers both local and federal funding sources. A complete funding plan is currently not available for future extension north of the Slauson/A Line Station. See response CR-EJ-1 regarding the approach and guidance used for the Environmental Justice (EJ) analysis and the identification of EJ communities. This study area follows FTA direction on EJ analysis. The EJ Affected Area consists of the Cities of Los Angeles (including the Central City North, Central City, and Southeast Los Angeles communities), Vernon, Huntington Park, Bell, Cudahy, South Gate, Downey, Paramount, Bellflower, Artesia, and Cerritos, as well as the unincorporated Florence-Firestone community of LA County. The City of Bell Gardens is outside of the EJ Affected Area, which is defined as the U.S. Census block groups that are located within or intersect the area within 0.25 mile of the alignment, parking facilities, and maintenance and storage facility site, and within 0.5 mile of stations; therefore, the City is not included in the EJ analysis. Metro coordinated extensively with the cities, stakeholders, and general public during preparation of the Draft EIS/EIR and Final EIS/EIR. Metro understands the importance of this Project to the Gateway Cities and will continue to coordinate with the cities, stakeholders, and general public throughout the planning process.
CC-7-4	Design of the alignment and stations will be consistent with Metro Rail Design Criteria, or equivalent criteria, and Metro's Systemwide Design Standards that are uniformly applied across all Metro lines. Refer to the response to comment CC-7-3 regarding the EJ analysis. The analysis indicated that adverse effects will not be disproportionately high and adverse and the implementation of proposed mitigation will be applied similarly within each EJ community, as necessary. The principles highlighted in the comment are addressed in the analysis. See response CR-GEN-5 regarding the implementation and recommendation of feasible mitigation measures.

Comment ID	Response
CC-7-5	The Study Area for the Project encompasses a 2-mile buffer from the four Build Alternative alignments evaluated in the Draft EIS/EIR, which includes the City of Bell Gardens. This Study Area was maintained in the Final EIS/EIR when analysis considered the Study Area. The Study Area maps and discussions in Chapters 1 and 2 of the Draft EIS/EIR and Final EIS/EIR correctly include Bell Gardens within this buffer. Current and projected Study Area characteristics within the full 2-mile buffer, such as traffic conditions, transit service and demand, population and employment densities, and travel demand, were considered and informed the Project's Purpose and Need in Chapter 1. Each individual section of the environmental document defines a specific Affected Area that is appropriate for analysis for that particular subject. The extent of the Affected Area for each topic is included in Chapter 4, Table 4.0.1 of the Draft EIS/EIR. The southern limit of Bell Gardens is between 1.00 and 1.25 miles from the Firestone Station crossing I-710 and the Los Angeles River. The anticipated station boardings shown in Chapter 3, Table 3.26 of the Draft EIS/EIR include transfers from feeder bus service serving Bell Gardens. The City is included in the First/Last Mile planning efforts that examine safe bike connections to the surrounding community within 3 miles of project stations. The City of Bell Gardens is located within 2 miles of the Project and is included in these planning efforts.
CC-7-6	Implementation of Draft EIS/EIR Mitigation Measure TRA-20 (Transportation Management Plan [TMP}) will address effects from construction activities on vehicular, transit, pedestrian, and bicycle access and mobility, including temporary lane/roadway, sidewalk, bicycle facility, and freeway ramp closures; detours; increases in traffic volumes (including regular traffic and construction traffic, construction equipment, materials delivery vehicles, waste/haul vehicles, and employee commutes); construction parking; and emergency services (e.g., fire, police, ambulances). Metro will coordinate the development of the TMP with local jurisdictions, agencies, and other potentially affected parties, such as schools. This measure is referred to as Mitigation Measure TRA-18 (Transportation Management Plan) in the Final EIS/EIR.
CC-7-7	In response to this comment, Chapter 5, Section 5.5.2.1 has been added to the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report,* and Section 3.4.5.2 has been added to the Final EIS/EIR to document the analysis of impacts associated with vehicular freight (e.g., freight trucks). The analysis did not identify any substantive changes to traffic patterns or the affected routes for heavy trucks and other commercial vehicles during operation of the Project in the City of Bell Gardens. There will be no changes to the physical roadway network (e.g., street closures) in the City of Bell Gardens with implementation of the Project. Trucks will continue to be restricted to designated truck routes and will not be diverted to streets where trucks are restricted.
CC-7-8	Freeway access will not be affected by the Project. See also responses to comments CC-7-6 and CC-7-7. Truck turn templates were run at key intersections where sharp left/right turns will be required as a result of the Project. Truck turn restrictions are identified at select grade crossings identified in Appendix B of the Final EIS/EIR. Routes through the City of Bell Gardens will not be affected.
CC-7-9	The Bicycle Hotel and Casino in Bell Gardens has been added to the Activity Centers identified in Figure 1-4 in Chapter 1, Section 1.4 of the Final EIS/EIR. This addition does not alter the environmental analysis or conclusions of the Draft EIS/EIR.
CC-7-10	See response CR-TRA-1 related to spillover parking impacts and additional transit parking.

Comment ID	Response
CC-7-11	See response to comment CC-7-10. Acquisitions identified for the Project are those needed to support project components, including park-and-ride facilities or construction laydown areas. These facilities or construction laydown areas near stations could provide opportunities for transit-oriented development/joint development around proposed stations, but such development would be consistent with goals, policies, and objectives of the local jurisdiction and at the discretion and approval of that jurisdiction.
CC-7-12	In response to comments submitted on the Draft EIS/EIR, including this comment, new parking surveys were conducted during non-holiday weekdays in January, March, and May 2023 on Tuesdays, Wednesdays, and Thursdays between the hours of 6:30 a.m. and 8:30 a.m., 10:00 a.m. and 12:00 p.m., and 11:00 a.m. and 2:00 p.m. The survey time periods were determined based on the surrounding land uses and considered parking restrictions in each neighborhood. The results of the parking surveys are presented in Chapter 3, Section 3.3.7 of the Final EIS/EIR and Section 4.5.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report.* A visual survey map is included in Appendix A of the report.
CC-7-13	See response CR-TRA-1 regarding the spillover parking analysis.
CC-7-14	As part of Mitigation Measure TRA-21 (Parking Monitoring and Community Outreach), Metro will work with the appropriate local jurisdiction, business owners, and affected communities for the corresponding station area to assess the need for an appropriate on-and off-street parking management program if it is found that parking demand increases with implementation of the LPA. Metro will also coordinate with and support jurisdictions in outreach meetings within the affected communities to gauge the interest of residents participating in a residential permit parking program. This measure is referred to as Mitigation Measure TRA-19 (Parking Monitoring and Community Outreach) in the Final EIS/EIR.
CC-7-15	See response to comments CC-7-3 and CC-7-4. Chapter 5, Section 5.2 of the *West Santa Ana Branch Transit Corridor Project Final Environmental Justice Impact Analysis Report* (Appendix FF to the Draft EIS/EIR) lists the environmental topics that would not result in an adverse effect to the Affected Area: Transportation (transit, active transportation, off-street parking, rail and vehicular freight); Land Use (operations; land use compatibility, regional plans); Communities and Neighborhoods (operations); Visual and Aesthetics (operations visual character and quality of scenic resources; construction); Air Quality; Greenhouse Gas Emissions; Ecosystems and Biological Resources; Geotechnical, Subsurface, Seismic Hazards; Hazards and Hazardous Materials; Water Resources; Energy; Electromagnetic Fields; Archaeological, Historical, and Paleontological Resources; Traditional Cultural Properties/Tribal Cultural Resources; Parklands and Community Facilities (operational access and function of parklands, community facilities); Economic and Fiscal Impacts; Safety and Security; and Section 4(f) Resources. In turn, these environmental topics would not result in a disproportionately high and adverse effect to EJ communities and were not analyzed in the EJ analysis. The EJ analysis includes all environmental topics that would have an adverse effect to the Affected Area for each environmental topic. The results of the EJ analysis for Alternative 3 in the Draft EIS/EIR remain valid.
CC-7-16	See response to comment CC-7-3.
CC-7-17	See response to comment CC-7-3.

Comment ID	Response
CC-7-18	See response to comment CC-7-3. Figure 4.22-4 shows the cities through which the alignment will directly traverse. The alignment will not traverse through the City of Bell Gardens and, therefore, the city is outside the EJ Affected Area and is not included in the EJ analysis.
CC-7-19	See responses to prior comments included in this submission. The City of Bell Gardens' support for the Project is noted.

City of Cerritos

From: John Jones <jjones@chwlaw.us>
Sent: Tuesday, September 28, 2021 1:50 PM
To: Khanna, Meghna <KhannaM@metro.net>; WSAB <WSAB@metro.net>
Cc: Art Gallucci <agallucci@cerritos.us>; Kristin Aguila <kaguila@cerritos.us>; Kanna Vancheswaran <kvancheswaran@cerritos.us>; Torrey Contreras <tcontreras@cerritos.us>; Michael Colantuono <mcolantuono@chwlaw.us>; William (Bill) Ihrke <bihrke@rutan.com>; Robert A Lopez <ralopez@cerritos.us>
Subject: Comments to Draft EIS / EIR for WSAB Transit Corridor
Importance: High

Dear Ms. Khanna,

Attached, please find:

- Comments to Draft Environmental Impact Statement / Environmental Impact Report for West Santa Ana Branch Transit Corridor; and
- Reiteration of Previous Requests by the City of Cerritos for a Below-Grade Project and 2) City of Cerritos Comments Regarding the West Santa Ana Branch Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report

CC-8-1

Please confirm that you have received the documents. If you have any problems opening the pdf files please let me know.

Thank you,

John L. Jones II

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Cerritos All-America City 2008

OFFICE OF THE CITY MANAGER
ART GALLUCCI

September 28, 2021

Meghna Khanna, Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-22-7
Los Angeles, CA 90012
Via e-mail: khannam@metro.net

Subject: **1) Reiteration of Previous Requests by the City of Cerritos for a Below-Grade Project and 2) City of Cerritos Comments Regarding the West Santa Ana Branch Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report**

Dear Mrs. Khanna:

Thank you for providing the City of Cerritos with an opportunity to review and comment on the Draft Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") for the West Santa Ana Branch ("WSAB") Transit Corridor light rail project proposed by the Los Angeles County Metropolitan Transportation Authority ("LACMTA"). City staff has reviewed the draft document and respectfully submits the comments herein relative to the environmental assessment prepared in support of the WSAB project to solicit further analysis and mitigation to be incorporated into the final EIS/EIR effectively rendering any potential adverse impacts to a level of insignificance in accordance with the fundamental tenets of environmental law. The City of Cerritos would also like to restate its opposition to the at-grade light rail and aerial configuration currently proposed by LACMTA for the Cerritos segment. Additionally, the City of Cerritos requests the inclusion of a Cerritos station in the Draft EIS/EIR so as not to preclude its potential to exist sometime in the future. Lastly, the City of Cerritos urges the LACMTA Board of Directors to consider a more equitable and reasonable alternative to the 3% local match requirement as currently proposed by LACMTA for the less affluent corridor cities within the Gateway Cities region and beyond the jurisdictional boundaries of the City of Los Angeles.

CC-8-2

CC-8-3

CC-8-4

The City of Cerritos has long maintained active involvement in the planning of the WSAB Transit Corridor. As early as the 1980s, recognizing growing regional traffic congestion and the need for an effective public transit solution in southeast Los Angeles County, the City of Cerritos participated in discussions regarding the feasibility of a transit line connecting Downtown Los Angeles to Orange County along the corridor when it was first considered by LACMTA. In 2003, the City of Cerritos sought to keep this momentum and was a founding member of the Orangeline Development Authority, now known as Eco-Rapid Transit, which was established to study, develop, and implement a public transportation system along the corridor. When the WSAB Transit Corridor project gained traction under LACMTA's oversight, the City of Cerritos continued to participate in the planning of the project through

CC-8-5

involvement in LACMTA-led meetings and submittal of written comments to LACMTA's project team. CC-8-5

Over the years, the City of Cerritos has remained committed to addressing worsening regional traffic congestion through smart and effective transit solutions while simultaneously advocating for regional transportation to facilitate reuse and economic development for the benefit of local communities. To this end, the City of Cerritos supports Locally Preferred Alternative 1 and Design Option 2, which provides for direct access to Union Station and the Regional Connector through the addition of the Little Tokyo Station. CC-8-6 Additionally, the City of Cerritos considers the environmental impacts of any transit solution to be of paramount importance. Accordingly, the City of Cerritos has continued to urge LACMTA to design the WSAB Transit Corridor project with a below-grade alignment within Cerritos boundaries to avoid adverse environmental impacts to Cerritos residents, businesses, and visitors. CC-8-7 Without a below-grade alignment, existing traffic conditions in the area will worsen and existing properties will be negatively affected.

Reiteration of Previous Requests by the City of Cerritos for a Below-Grade Project

In light of the City of Cerritos' longstanding interest and involvement in developing an effective public transit solution along the project corridor and ongoing public involvement in the WSAB project, the City of Cerritos is concerned that the WSAB project scope as detailed in the Draft EIS/EIR did not include a below-grade design, or even a design alternative, within Cerritos boundaries, despite many previous written requests by the City of Cerritos, which have been attached for reference. While the Draft EIS/EIR acknowledges in Section 2.4.4.2 that, during scoping, comments were received requesting an underground alignment, particularly in the southern portion of the project corridor, the Draft EIS/EIR makes no specific mention of the City of Cerritos' requests. Instead, the Draft EIS/EIR lists several reasons that an underground alignment was not considered. Specifically, the Draft EIS/EIR cites increased construction cost and a lengthened project schedule due to increased construction complexity posed by an underground alignment. Noting that the project budget is constrained by available Measure M funding, the Draft EIS/EIR concludes, "an underground LRT alignment of any length in the southern section of the project corridor would introduce additional substantial project costs and risks making it neither fiscally feasible nor prudent under the Measure M funding constraints; therefore, this alignment is not considered further in the Draft EIS/EIR" (pg. 2-11). CC-8-8

The City of Cerritos strongly disagrees with this reasoning. Firstly, with respect to project cost, as publicly stated by LACMTA representatives on numerous occasions, currently available Measure M funding is sufficient only to cover the cost of Alternatives 3 and 4 of the project; Alternatives 1 and 2 will require additional funding beyond that which LACMTA currently has locally available. In fact, the primary reason that LACMTA has prepared a Draft EIS under NEPA is to be positioned to secure federal funding for the project. Since LACMTA has already demonstrated its willingness and ability to analyze project alternatives that are not fully funded under Measure M (Alternatives 1 and 2), LACMTA should likewise fully analyze below-grade alternatives and seek the additional funding required to construct the below-grade alternatives. The City of Cerritos believes that below-grade alternatives would most effectively mitigate the environmental impacts to adjacent sensitive residential land uses already identified in the Draft EIS/EIR related to traffic, noise and vibration, air quality, visual and aesthetics, and environmental justice among others, and are therefore worth the additional expenditure to ensure effective environmental mitigation. Sensitive CC-8-9

receptors are protected under NEPA and CEQA, and all alternatives analyzed must take into consideration the greatest protections in these areas. Recent federal legislation for infrastructure funding has been passed and is a potential funding source for any additional monies that might be necessary to help ensure effective environmental mitigation through a below-grade alignment. A lack of analysis in this area would mean that no funding would be available for a below-grade option because it has not undergone environmental review. CC-8-9

Secondly, with respect to project timing, LACMTA representatives have already publicly acknowledged that portions of the project, particularly the Downtown Los Angeles segments of Alternatives 1 and 2, are unlikely to be completed by the hoped-for project completion year of 2028 and that the project may need to be completed in phases. The WSAB Transit Corridor project introduces a permanent change to the existing landscape that will dramatically impact the communities of Southeast Los Angeles County for many years. Therefore, within the time horizon of the project's lasting impact, the added construction time associated with below-grade construction in Cerritos is negligible and of little consequence in the long term. The City of Cerritos believes that below-grade alternatives are worth the additional time needed to construct a below-grade project within Cerritos boundaries to ensure effective environmental mitigation.

The City of Cerritos requests that the Draft EIS/EIR be revised to fully analyze below-grade alternatives within Cerritos boundaries. Specifically, those below-grade alternatives should include the following potential construction methods: 1.) underground tunneling and 2.) cut-and-cover. Underground tunneling is the construction method proposed for the Downtown Los Angeles portions of Alternatives 1 and 2. Cut-and-cover entails the digging of existing soil to install a below-grade structure and covering it with soil upon completion. CC-8-10

Based on preliminary research conducted by the City of Cerritos, it is estimated that the abovementioned construction methods would have varying degrees of cost impacts and are therefore worth analyzing:

Construction Method	**Estimated Cost Per Mile**
1. Underground Tunneling	$800 million to $1 billion per mile
2. Cut-and-Cover	$50 million to $150 million per mile

(Sources: 1. LACMTA Purple Line Extension project budget estimates. 2. Halcrow Fox (2000). World Bank Urban Transport Strategy Review: Mass Rapid Transit in Developing Countries. Final Report, World Bank, Washington, DC. Estimates adjusted to current dollars.)

Without a full analysis of below-grade alternatives, the Draft EIS/EIR remains wholly deficient under NEPA and CEQA. Metro cannot forego a complete analysis of the environmental impacts of its project, a reasonable range of alternatives to the project that would reduce its impacts, and feasible measures to mitigate remaining impacts on the basis that it will be too expensive to do so. Metro must demonstrate these alternatives are not feasible or would not mitigate impacts. It does neither, simply expressing its policy preferences rather than providing the complete environmental analysis CEQA and NEPA require. CC-8-11

The City of Cerritos hereby reiterates its previous requests for a below-grade project design within Cerritos boundaries. If a below-grade project within Cerritos will not be accommodated, then the City of Cerritos requests that the southern terminus of the project be the Bellflower Station, thereby eliminating the Cerritos segment from the project. Terminating the line in Bellflower will address funding shortfalls and allow a line through Cerritos to be pursued only when an environmentally responsible line can be achieved. Future generations will not thank us for a hasty project that has significant detriment to residents, property owners, and business in Artesia and Cerritos when more deliberation might have avoided those harms. CC-8-12

City of Cerritos Comments Regarding the WSAB Project Draft EIS/EIR

Notwithstanding the above-described failure of the Draft EIS/EIR to include a below-grade design in Cerritos, the City of Cerritos has identified several other areas of concern within the analysis contained in the Draft EIS/EIR. These areas of concern are based on the project scope as currently defined and presented by LACMTA. Therefore, while the City of Cerritos maintains that the WSAB project must be below grade within Cerritos, and that the southern terminus of the project must end at Bellflower Station if a below-grade project in Cerritos will not be accommodated, the City of Cerritos hereby submits formal comments regarding the current WSAB Draft EIS/EIR in protest. These comments are based on the merits of the Draft EIS/EIR as presented and are not intended to imply in any way that the City of Cerritos agrees with or accepts the at-grade and aerial crossing designs currently proposed for the project. For ease of reference, the following comments are sequentially numbered but have been divided by topic corresponding to the environmental topics as outlined in the Draft EIS/EIR. CC-8-13

The City of Cerritos solicited the services of Willdan Engineering to review the Draft EIS/EIR and assist the City in preparing technical comments. Willdan Engineering has prepared a memorandum dated September 20, 2021, attached to this letter. Willdan Engineering's comments are hereby incorporated by reference, and the City of Cerritos' comments for the record shall include those listed in the attached memorandum in addition to those listed below.

Traffic/Transportation

1. Inadequate Intersection Analysis: Subregional Station Requires Wider Analysis Scope. The Draft EIS/EIR identifies and studies traffic and circulation impacts at several intersections in close proximity to the WSAB Transit Corridor. These include thirteen (13) intersections within Cerritos and Artesia, between Artesia Blvd./Dumont Ave. to the northwest and South St./Elaine Ave. to the southeast. As the last (terminus) station on the planned route, the Pioneer Station will be a subregional destination attracting riders from a large geographic area beyond Cerritos and Artesia, extending into northern Orange County. Yet, the Draft EIS/EIR fails to analyze traffic impacts resulting from drivers accessing the station from a wider geographic reach, including from the two freeways in close proximity to the Pioneer Station: I-605 and SR-91. The City of Cerritos is concerned that the Draft EIS/EIR has not adequately assessed the project's impact on traffic in the subregion. Accordingly, the City of Cerritos requests that the Draft EIS/EIR be revised to analyze impacts to key intersections along South St., Pioneer Blvd., Studebaker Rd., Gridley Rd., Del Amo Blvd., 195th St., and Artesia Blvd. connecting to the I-605 CC-8-14

freeway, SR-91 freeway, and surrounding cities including Lakewood, Cypress, La Palma, Buena Park, La Mirada, Santa Fe Springs, and Norwalk. Those intersections should include, but not be limited to: South St./Norwalk Blvd., South St./Bloomfield Ave.; South St./Alburtis Ave., South St./Gridley Rd., South St./I-605 freeway, Pioneer Blvd./195th St., Pioneer Blvd./Los Coyotes Blvd., Pioneer Blvd./Del Amo Blvd., Pioneer Blvd./183rd St., Pioneer Blvd./Artesia Blvd., and Pioneer Blvd./SR-91 freeway. Any intersections experiencing a significant impact must be fully mitigated. CC-8-14

2. Requested Mitigation Measure – Widening of Obsolete Bridges. In light of the aforementioned subregional traffic impacts resulting from the terminus at Pioneer Station, the City of Cerritos requests that a mitigation measure be added requiring that the following obsolete bridges in the vicinity of the WSAB project be widened and/or improved to accommodate the added vehicular traffic the project will generate: Del Amo Blvd. bridge over Coyote Creek, Artesia Blvd. bridge over San Gabriel River, and 195th St. bridge over I-605 freeway. These bridges are currently deficient in terms of required number of lanes and/or pedestrian or bicycle access and will be choke points for accessing Pioneer Station. Any delay or buildup of traffic is likely to have significant impacts not only on traffic and transportation but also in the areas of air quality and environmental justice. CC-8-15

3. Failure to Analyze Driveway Impacts Near Pioneer Station. The Draft EIS/EIR fails to analyze impacts to left-turn movements at the residential and commercial driveways on the east (Cerritos) side of Pioneer Blvd., north of South St. These driveways include the Plaza Walk residential townhome development (intersection of Pioneer Blvd. and Solana Pl.) and the commercial retail/office development to its immediate south. The City of Cerritos is concerned that Plaza Walk residents and the commercial patrons and employees will be severely limited in the ability to make left-hand turns onto Pioneer Blvd. as a result of the added traffic to and from the new 1,100-space parking structure at Pioneer Station. As already noted in the Draft EIS/EIR, Project Measure TR PM-10 requires that vehicular access to the Parking Station parking structure is to be primarily directed through signage to enter/exit from Pioneer Boulevard, thereby limiting vehicle access to/from Corby Ave. and other adjacent residential streets to the west of Pioneer Blvd. There is no similar consideration of residential streets to the east of Pioneer Blvd., including Solana Pl. The City of Cerritos requests that the Draft EIS/EIR be revised to analyze impacts to the aforementioned driveways along the east side of Pioneer Blvd. and include any associated mitigation, including but not limited to traffic signal(s) to ensure adequate access and circulation. CC-8-16

4. Inadequate Parking Supply at Pioneer Station. The Draft EIS/EIR states that as many as 5,706 daily boardings are estimated at the Pioneer Station, which translates to an estimated year 2042 parking demand of 1,450 parking spaces. In comparison, however, the station will accommodate only 1,100 onsite (off-street) parking spaces. The Draft EIS/EIR acknowledges that the 350-space parking deficiency will result in spillover parking impacts to areas outside the station, and LACMTA proposes relying on existing on-street parking to meet the additional parking demand. The Draft EIS/EIR states that there is an existing "unused" on-street parking capacity of 630 parking spaces, but it does not identify where those spaces are or how it was determined that such capacity is "unused". The City of Cerritos disagrees with this approach, as existing on-street parking is already impacted by existing businesses in CC-8-17

Artesia, many of which currently do not contain sufficient onsite (off-street) parking spaces. Furthermore, on-street parking is prohibited on most arterial streets in Cerritos, including on Pioneer Blvd. and South St. in the vicinity of the proposed Pioneer Station for reasons of traffic flow and traffic safety. Therefore, the Draft EIS/EIR's estimated "unused" on-street parking capacity is likely overinflated. The City of Cerritos is concerned that the parking space deficiency at Pioneer Station, combined with the use of existing on-street parking by surrounding businesses, will result in adverse spillover parking impacts to existing commercial shopping centers in Cerritos, which is unacceptable. Proposed Mitigation Measures TRA-21 (Parking Monitoring and Community Outreach) and TRA-22 (Loss of Parking) include such nebulous statements as "Metro would coordinate with local jurisdictions" and "an assessment would be conducted", essentially deferring the parking problem to the future when providing sufficient onsite (off-street) parking will be too late. CEQA, of course, requires the Draft EIR to analyze all foreseeable project impacts, not to defer that analysis until a commitment to the project has been made (e.g., *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 194, citing *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296)). Instead, the City of Cerritos requests that the Pioneer Station plan be modified to supply all of the projected year 2042 parking demand of 1,450 parking spaces. This can be accomplished by distributing the parking spaces among multiple parking structures, which would reduce the massing and scale of the single parking structure that is currently proposed, thereby making the new structures more compatible with existing adjacent development. Those multiple parking structures could be designed and placed in such a manner that they could be utilized by both transit users and patrons of local businesses. CC-8-17

5. Requested Mitigation Measure – Increased Onsite Parking Supply at Pioneer Station. In light of the aforementioned parking deficiency at Pioneer Station, the City of Cerritos requests that a mitigation measure be added requiring that the Pioneer Station plan be modified to supply all of the projected year 2042 parking demand of 1,450 parking spaces within an onsite (off-street) parking structure or multiple parking structures as described above. CC-8-18

6. Requested Mitigation Measure – In-Lieu Parking Fees. To the extent that any projected parking demand at a station cannot or will not be accommodated within an onsite (off-street) parking structure or multiple parking structures, the City of Cerritos requests that a mitigation measure be added requiring LACTMA to pay parking in-lieu fees in perpetuity, with said fees increasing over time, to all cities located within a half-mile radius of any such station containing insufficient onsite (off-street) parking supply. Such fees would be used by the affected cities to provide parking facilities to satisfy the parking deficiency generated by the WSAB terminus at Pioneer Station. CC-8-19

7. Failure to Analyze Impacts of Bus Bays on Pioneer Blvd. Traffic. The Draft EIS/EIR states that bus bays will be provided along Pioneer Blvd. at Pioneer Station to accommodate future bus connections. However, the Draft EIS/EIR does not analyze the impact of such bus bays, including turn-in and turn-out movements, on traffic and circulation along Pioneer Blvd. that was recently improved by the City of Artesia to accommodate wider pedestrian walkways and on-street parking helping to create a new walkable downtown area for local businesses and their customers. These CC-8-20

improvements were achieved by eliminating existing vehicle traffic lanes causing restricted traffic circulation conditions on Pioneer Blvd. and traffic to divert into adjacent residential neighborhoods to avoid existing traffic congestion. The City of Cerritos requests that the traffic analysis in the Draft EIS/EIR be revised to include an analysis of potential impacts of the planned bus bays at Pioneer Station on Pioneer Blvd. traffic and circulation, including potential impacts to existing residential and commercial driveways along Pioneer Blvd. in the vicinity of Pioneer Station. Further, all bus bays shall be required to be constructed of concrete due to the weight of these vehicles thereby reducing associated maintenance costs incurred by the city. CC-8-20

8. Failure to Analyze Impacts of Permanent Street Closures in Artesia on Traffic in Cerritos. As proposed, portions of 187th St. and 188th St. will be permanently closed to accommodate the new Pioneer Station. These street closures will cause traffic to be diverted onto other streets, including those in Cerritos, but such impacts are not disclosed nor addressed in the Draft EIS/EIR. Accordingly, the City of Cerritos requests that the Draft EIS/EIR be revised to include a traffic mitigation plan that analyzes the potential spillover traffic impacts of the closures of 187th St. and 188th St. on other streets, including streets in Cerritos, and that incorporates mitigation measures to reduce said impacts to a level of insignificance. CC-8-21

9. Inadequate HCM/Synchro Model Analysis. As described in Appendix D of the Draft EIS/EIR, the HCM/Synchro model was used to analyze various study locations. It appears that program default values were used, which may not represent the unique attributes of the specific study locations; Section 9 of Appendix D does not appear to reference any detailed analysis reports or studies that could have resulted in more informed assumptions. Accordingly, the City of Cerritos requests that program values in the HCM/Synchro model be adjusted to simulate actual field conditions and that the Draft EIS/EIR be revised accordingly. CC-8-22

   Furthermore, the HCM/Synchro software has limited ability to properly simulate a train crossing event (i.e., a train crossing and activating the gate), and the analysis does not show how HCM/Synchro simulates a train crossing. The City of Cerritos is concerned that the unique condition of a train crossing event cannot be set and controlled by the model and, as a result, the model is inaccurate in its output, thereby skewing the true potential traffic impacts from the project. The City of Cerritos requests that the analysis be revised and improved to address this deficiency.

10. Failure to Analyze Impacts of Tail Tracks on Pioneer Blvd./South St. Traffic. As proposed, tail tracks accommodating layover storage will be located east of Pioneer Blvd., north of South St. As a result, trains will need to cross Pioneer Blvd. between Pioneer Station and the tail tracks. Unlike other at-grade crossings at which trains will cross at normal speeds, thereby having a shorter train crossing event, the Pioneer Blvd. crossing will have a significantly longer train crossing event duration, with trains decelerating to an estimated 5 miles per hour and/or starting from a dead stop. In furtherance of the above comment related to the HCM/Synchro Model Analysis, the City of Cerritos requests that the Draft EIS/EIR be revised to analyze the impacts of the long train crossing duration on traffic congestion along Pioneer CC-8-23

Blvd. as well as spillover impacts to South St. in the City of Cerritos. CC-8-23

11. Inadequate Analysis of Emergency Vehicle Access to Businesses. Los Angeles County Fire Department Station 30 is located to the south of the aforementioned Pioneer Blvd. crossing at 19030 Pioneer Blvd. in Cerritos. The fire station serves the many businesses located immediately north of the subject crossing in Artesia. Those businesses will be significantly impacted due to southbound queuing blocking emergency vehicle access as well as northbound queuing creating emergency response delays. The City of Cerritos further requests that the Draft EIS/EIR be revised to analyze the impacts of the long train crossing duration on emergency vehicle access to businesses in the vicinity of the subject crossing and to show how these emergency vehicle access impacts will be addressed. All potentially significant hazards and public service impacts must be fully analyzed and mitigated. CC-8-24

12. Inadequate Mitigation Near Artesia Blvd./Dumont Ave. Intersection. Mitigation Measure TRA-18 is currently proposed to add a westbound through lane at the intersection of Artesia Blvd. and Dumont Ave. (Intersection No. 89). However, the Draft EIS/EIR does not address the impacts of the Artesia Blvd. segment to the east of the Artesia Blvd./Dumont Ave. intersection, including the LOS of the roadway segment to the east of the intersection. The Draft EIS/EIR does not disclose whether this segment is significantly impacted, nor does it indicate how far east the additional westbound through lane can be extended. The City of Cerritos requests that the Draft EIS/EIR be revised to address the impacts to the Artesia Blvd. segment between Dumont Ave. and Studebaker Rd. and to provide more detail regarding the extents of the contemplated through lane, including whether the through lane can begin at Studebaker Rd. CC-8-25

13. Potentially Unwarranted Lane Width Reduction. In Table 3.51, Anticipated Construction-Related Closures, on pg. 3-138 of the Draft EIS/EIR, a permanent lane width reduction is proposed at South St. (Site No. 86). However, the Draft EIS/EIR provides no detail regarding the proposed extent, purpose, and reasons for a potential lane width reduction at this location. The City of Cerritos is opposed to any proposed reduction at South Street in light of the traffic impacts it anticipates and requests that such details regarding the proposed lane width reduction at South St. be fully disclosed, analyzed, and effectively mitigated under protest. CC-8-26

14. Undisclosed Impacts of Private Driveway Closure. In Table 3.51, Anticipated Construction-Related Closures, on pg. 3-137 of the Draft EIS/EIR, a permanent private driveway closure is proposed at Extra Space Storage (Site No. 83). However, the Draft EIS/EIR provides no detail regarding the proposed extent, purpose, and reasons for a potential driveway closure at this location. The City of Cerritos requests that such details regarding the proposed driveway closure be fully disclosed and analyzed, including potential access and circulation impacts to adjacent businesses and private properties including Extra Space Storage (10755 Artesia Blvd.), Navens Horse Stable (10755½ Artesia Blvd.), and Cerritos Industrial Park businesses (10805 Artesia Blvd). All impacts to these businesses must be fully mitigated. CC-8-27

15. Requested Mitigation Measure – Comprehensive Traffic Monitoring System. The City of Cerritos requests that a mitigation measure be added implementing a CC-8-28

comprehensive traffic monitoring system, including traffic signal synchronization, to ensure adequate traffic flow through the crossings and to and from the Pioneer Station within the greater subregion. The traffic monitoring system shall be developed in coordination with the City of Cerritos. CC-8-28

16. Failure to Analyze Potential Cerritos Station. The Draft EIS/EIR does not show a station in the City of Cerritos. Although the City of Cerritos requested in 2017 that a Cerritos station not be required to be constructed as part of the WSAB project due to the lack of community support for a station at that time, the City Council in 2018 formally asked Metro to allow for the potential of a Cerritos station to exist between Studebaker Rd. and Gridley Rd. at the Metro alignment south of Artesia Boulevard as an alternative station location for future consideration (see the attached letters to Mr. Manjeet Ranu, dated June 22, 2018, and to Ms. Julia Brown, dated November 7, 2018). The EIS/EIR does not show a station at this location, does not explain whether it was considered and rejected, or whether it was considered at all. The City hereby repeats the request that a potential station located between Studebaker Rd. and Gridley Rd. in the City of Cerritos be evaluated as an alternative in the Draft EIS/EIR or as a supplement to the Draft EIS/EIR that would allow for a Cerritos station to exist as part of a subsequent phase as previously stated in the letter dated June 22, 2018. Any lack of analysis or acknowledgment for the potential of such a station may result in the inability to secure funding, especially federal infrastructure funding. The project should not foreclose transportation alternatives that might be developed in the future merely for a failure to analyze them now. This is a once-in-a-generation transit investment; we should do it thoughtfully. CC-8-29

17. Requested Mitigation Measure – Design for Potential Future Cerritos Station. In light of the abovementioned request by the City of Cerritos to consider and analyze a potential future Cerritos station, the City of Cerritos requests that a Cerritos station be included as an alternative in the Draft EIS/EIR and/or a mitigation measure be added requiring the preparation of a supplemental environmental assessment to be prepared for the potential Cerritos station paid for by transportation funding assigned to the WSAB Transit Corridor project. Said environmental assessment shall serve as an extension or "tier" of the master WSAB EIS/EIR, and both environmental assessments shall be considered and approved concurrently. In order to further protect the potential for a station in the City of Cerritos in the future, a mitigation measure shall be included in the Draft EIS/EIR requiring that all of the infrastructure required to accommodate a future Cerritos station be designed, installed and constructed including, but not limited to, transportation related infrastructure and equipment as well as site improvements, structures and amenities found at other station locations along the corridor. CC-8-30

Land Use

18. Conflict with Local Zoning and Land Use Policies. All LACMTA-owned property within Cerritos is zoned Open Space (OS), which is regulated under Chapter 22.30 of the Cerritos Municipal Code. Cerritos Municipal Code Section 22.30.700(3)(a) states: "No building shall provide vision into an adjacent residential yard." However, LACMTA's proposed aerial crossing design at the intersection of Gridley Rd. and 183rd St, provides vision into several adjacent residential rear yards to the north of the LACMTA right-of-way, in conflict with the City's zoning standard. Furthermore, CC-8-31

Policy LU-9.1 of the Cerritos General Plan Land Use Element calls for the protection of "residential uses from the effects of potentially incompatible uses" by maintaining standards for "noise, setbacks, buffer areas, landscaping and architecture, which ensure compatibility between the uses." As described further in the "Visual and Aesthetics" and "Noise and Vibration" sections of this letter, LACMTA's proposed aerial crossing design is incompatible with the aforementioned Cerritos General Plan provision. The Draft EIS/EIR fails to disclose the conflicts between the proposed project, particularly the proposed aerial crossing, and locally adopted regulations and policies contained in the Cerritos Municipal Code and Cerritos General Plan; as a result, the Draft EIS/EIR inaccurately determines that there are no significant land use impacts. The City of Cerritos requests that the Draft EIS/EIR be revised to address these conflicts and the associated mitigation measures requested in the "Visual and Aesthetics" and "Noise and Vibration" sections of this letter. CC-8-31

Communities and Neighborhoods

19. Failure to Analyze Loss of Privacy. The Draft EIS/EIR fails to analyze the loss of privacy potentially experienced by residents who live adjacent to elevated sections of track, including the proposed aerial crossing at Gridley Rd. and 183rd St. No documentation or illustration is provided to demonstrate whether the proposed elevated crossing designs, including proposed sound walls, are adequate to prevent riders from seeing into residences and back yards. Walls may also be inadequate to prevent maintenance crews from looking into adjacent private properties. The loss of privacy would adversely and detrimentally impact the adjacent neighborhoods. The City of Cerritos requests that the Draft EIS/EIR be revised to include cross-section illustrations that show a typical line-of-sight from seated and standing positions within a rail car on the proposed aerial crossing and from a standing position at the tallest work location toward an adjacent property. Please see the "Visual and Aesthetics" and "Noise and Vibration" sections of this letter for related requested mitigation measures. CC-8-32

Visual and Aesthetics

20. Failure to Disclose Visual Impact of Aerial Crossing. LACMTA proposes to construct an aerial crossing at the intersection of Gridley Rd. and 183rd St. While the Draft EIS/EIR contains several drawings and renderings of other proposed stations and features along the WSAB Transit Corridor in the main Draft EIS/EIR document, no rendering or drawing of the proposed Gridley Rd./183rd St. aerial crossing is provided. Therefore, the potential visual impact of the proposed aerial crossing has not been fully disclosed. The City of Cerritos is concerned that the proposed aerial crossing will result in adverse visual and privacy impacts to adjacent residential properties in Cerritos and Artesia, as discussed in the "Land Use" and "Communities and Neighborhoods" sections of this letter. The City of Cerritos requests that the Draft EIS/EIR be revised to include renderings and drawings illustrating the appearance of the proposed aerial crossing in relationship to adjacent single-family residences, including perspective views from the rear yards of said residences. The City of Cerritos further requests that the renderings and drawings be prepared in consultation with the City and also illustrate the requested mitigation measures identified below. CC-8-33

21. Requested Mitigation Measure – Vertical Screening. In light of the aforementioned concerns regarding the visual and privacy impacts associated with the proposed aerial crossing at Gridley Rd. and 183rd St., the City of Cerritos requests that a mitigation measure be added to require vertical decorative screening along the north side of the aerial crossing to obscure and prevent visibility into residential rear yards. The vertical decorative screening shall be designed in collaboration with the City of Cerritos and incorporated into the architectural design of the aerial crossing structure, and the screening design, including color, material, and detailing, shall be subject to review by the City of Cerritos. CC-8-34

22. Requested Mitigation Measure – Vertical Landscape Screening. In light of the aforementioned concerns regarding the visual and privacy impacts associated with the proposed aerial crossing at Gridley Rd. an 183rd St., the City of Cerritos requests that a mitigation measure be added to require vertical landscape screening, in the form of vertical trees and tall hedges, along the north side of the aerial crossing to soften the structure's appearance as viewed from adjacent residences. The landscape design and planting plan, including tree species, size, and spacing, shall be subject to review by the City of Cerritos. CC-8-35

23. Requested Mitigation Measure – Column Design. The City of Cerritos requests that a mitigation measure be added requiring decorative columns in lieu of retaining walls for the proposed aerial crossing at Gridley Rd. and 183rd St., in order to provide greater visibility at the Gridley Rd./183rd St. intersection. By way of example, the City of Cerritos requests that LACMTA reference the column design at the existing pedestrian bridge located at the intersection of Telegraph Rd. and Norwalk Blvd. in Santa Fe Springs. CC-8-36

24. Requested Mitigation Measure – Landscape Anchoring. The City of Cerritos requests that a mitigation measure be added requiring the installation of landscape anchoring around the proposed columns at the bases of the aerial crossing at Gridley Rd. and 183rd St., i.e., where the aerial crossing meets ground level, in order to soften the structure's appearance and visual impact and to deter graffiti. By way of example, the City of Cerritos requests that LACMTA reference the landscape treatment at the existing pedestrian bridge located at the intersection of Telegraph Rd. and Norwalk Blvd. in Santa Fe Springs. The landscape design and planting plan, including tree species, size, and spacing, shall be subject to review by the City of Cerritos. CC-8-37

25. Requested Mitigation Measure – Sound Wall Design. The City of Cerritos requests that a mitigation measure be added requiring that all new sound walls be consistent with the City of Cerritos' community design standards, which require decorative block (e.g., split face block), decorative pilasters, and decorative wall caps. Plain slump block or precision block walls are not permitted. Design of all sound walls, including colors and materials, shall be subject to review by the City of Cerritos. CC-8-38

26. Requested Mitigation Measure - Landscape Improvements within LACMTA Right-of-Way. The City of Cerritos requests that a mitigation measure be added requiring that the area located within the extents of the LACMTA right-of-way be improved to accommodate passive recreational uses such as pedestrian and bikeway paths similar to those found in the cities of Bellflower and Artesia. Additionally, the full extent of the LACMTA right-of-way shall be landscaped, irrigated and illuminated CC-8-39

with reclaimed water and power, respectively, provided by the City of Cerritos. The landscape and site design for the LACMTA right-of-way shall be prepared in consultation with the City of Cerritos and subject to the City's final approval. Further, the landscape design and resulting right-of-way improvements shall be paid for by transportation funding assigned to the WSAB project. CC-8-39

27. Requested Project Measure - Billboard Removal. The City of Cerritos acknowledges for the record that, as stated on pg. 4-177 of the Draft EIS/EIR, "billboards within rail ROWs would be removed" in connection with the WSAB Transit Corridor project. The City of Cerritos concurs with this action, since billboards are prohibited in the City of Cerritos, and existing billboards located within the LACMTA-owned right-of-way are nonconforming structures in violation of the Cerritos Municipal Code. The City of Cerritos requests that a project measure be added memorializing the required billboard removal and ensuring that the removal of all billboards on LACTMA-owned property in Cerritos be completed in a timely manner. CC-8-40

Air Quality

28. Failure to Analyze Brake Dust from Light Rail Vehicles. The City of Cerritos is concerned about health impacts to adjacent sensitive residential land uses from brake dust, or particulate matter resulting from mechanical abrasion between rails, wheels, and brakes. The Draft EIS/EIR fails to analyze this air quality impact, making reference only to brake dust associated with construction vehicles. Compounding this concern is the existence of two major freeways (I-605 and SR-91) that traverse the City of Cerritos; the added particulate matter associated with brake dust would result in a cumulative impact that has not been analyzed.

    Several studies and articles have been published related to health impacts associated with brake dust, including train brake dust. Such studies and articles include:

    1.) "Brake dust exposure exacerbates inflammation and transiently compromises phagocytosis in macrophages" by Liza Selley et al. https://pubs.rsc.org/en/content/articlelanding/2020/mt/c9mt00253g#!divAbstract CC-8-41

    2.) "Particle emissions from rail traffic: a literature review" by Saeed Abbasi et al. http://www.diva-portal.org/smash/get/diva2:434170/FULLTEXT02

    3.) "'People should be alarmed': air pollution in US subway systems stuns researchers" by Oliver Milman. https://www.theguardian.com/environment/2021/feb/10/subway-air-pollution-new-york-washington-dc

    4.) "London's Subway Commuters Breathe More Pollution Than Drivers" by Feargus O'Sullivan. https://www.bloomberg.com/news/articles/2017-02-16/the-london-underground-s-air-pollution-problem

    5.) "Invisible Enemy: Micro-Dust Gets More Attention as Underground Rail Traffic Grows" by Dr. Bernd Hagenah. https://csengineermag.com/invisible-enemy/

    The City of Cerritos requests that the Draft EIS/EIR be revised to analyze air quality impacts associated with brake dust, including particulate matter resulting from

mechanical abrasion between rails, wheels, and brakes. The analysis must include review of alternative technologies designed to minimize or eliminate such impacts. CC-8-41

Noise and Vibration

29. Failure to Mitigate "Severe" Noise Impacts. Table 4.7.7 on pg. 4-278 of the Draft EIS/EIR identifies several noise clusters in Cerritos, including all adjacent residential properties, that will remain with a "Severe" noise impact after mitigation (i.e., the proposed construction of sound walls). This is entirely unacceptable, and the City of Cerritos requests that LACMTA modify the project and introduce additional mitigation measures to eliminate noise impacts to adjacent sensitive land uses, including residential properties. Alternatives to at-grade and above-grade construction, such as undergrounding and trenching, can mitigate these impacts. CC-8-42

30. Failure to Analyze Impacts to Rosewood Park. The Draft EIS/EIR identifies Artesia Cemetery as a Category 3 "noise cluster" (N305) for which potential noise impacts were analyzed, whereas Rosewood Park is not identified a noise cluster and thus Rosewood Park was excluded from noise impact analysis. The City of Cerritos disagrees this this approach, as Rosewood Park is adjacent to the subject LACMTA right-of-way whereas Artesia Cemetery is not. As a result, no mitigation is proposed for Rosewood Park, which will be impacted by noise emanating from passing trains. The City of Cerritos requests that the Draft EIS/EIR be revised to analyze potential noise impacts to Rosewood Park. CC-8-43

31. Failure to Show Noise Contours and Disclose Related Noise Impacts. The Draft EIS/EIR fails to show noise contours along the projected WSAB Transit Corridor. As a result, the Draft EIS/EIR does not disclose the relative noise impacts to properties corresponding to their distance from the LACMTA right-of-way. The City of Cerritos requests that the Draft EIS/EIR be revised to include noise contours illustrating projected noise levels, both for the proposed project and for nearby arterial streets where that information is available. CC-8-44

32. Requested Mitigation Measure – Noise Reduction for Adjacent Residential Properties. LACMTA has established a precedent of funding noise reduction improvements for residences along the L/Gold Line in and near Pasadena. Accordingly, the City of Cerritos requests the same consideration and requests that a mitigation measure be added requiring LACMTA to fund and implement all of the following noise reduction measures for all residential properties located adjacent to the LACMTA-owned right-of-way between Rosewood Park and Gridley Road: CC-8-45

    a. 10-foot-high concrete block walls along the southerly edge of the residential properties, maintained by LACMTA in perpetuity or for as long as the WSAB rail line remains in operation

    b. Dual-pane window retrofit with high sound transmission class (STC) rating

    c. Added insulation/sound board in building walls

    d. Sound curtains for windows

e. New air conditioning systems with enhanced filtration

33. Requested Mitigation Measure – Noise Reduction for Rosewood Park. The City of Cerritos requests that a mitigation measure be added requiring LACMTA to construct a 10-foot-high concrete block walls along the southerly edge of Rosewood Park, maintained by LACMTA in perpetuity or for as long as the WSAB rail line remains in operation, to shield Rosewood Park from noise emanating from passing trains. CC-8-46

34. Requested Mitigation Measure – TPSS Relocation and Enclosure. The Draft EIS/EIR states that a traction power substation (TPSS) is proposed at the northwest corner of Gridley Rd. and 183rd St. in Cerritos. As noted on pg. 7-10 of the Draft EIS/EIR, the subject TPSS was originally located at the southeast corner of the intersection in Artesia and was relocated by LACMTA staff at the request of the City of Artesia to accommodate a bike path. The City of Cerritos requests that the subject TPSS be relocated back to the southeast corner of the subject intersection in the City of Artesia, away from single-family residences in the City of Cerritos, and in an area that does not conflict with the bike path. It should be noted that the Cerritos Bikeway Master Plan contemplates a future Class I bike path along the LACMTA right-of-way in Cerritos, and all facilities should be designed so as not to preclude a potential Class I bike path in the future. (See the attached Cerritos Bikeway Master Plan, also available online: http://www.cerritos.us/ pdfs/cerritos_bike_paths.pdf) CC-8-47

    The City of Cerritos additionally requests that a mitigation measure be added requiring all TPSS facilities to be located underground and/or enclosed within masonry block wall enclosures to reduce equipment noise and improve aesthetics and ensure consistency with City of Cerritos requirements for exterior noise-generating equipment.

35. Requested Mitigation Measure – Quiet Zones at All At-Grade Crossings. The City of Cerritos requests that a mitigation measure be added requiring all at-grade crossings in Cerritos and Artesia to be established as quiet zones, to reduce noise impacts to adjacent sensitive residential land uses, particularly during evening and nighttime hours. CC-8-48

36. Requested Mitigation Measure - Reduced Nighttime Service Hours. As currently proposed, the WSAB Transit Corridor light rail line will operate daily from 4:00 a.m. to 2:00 a.m. (22 hours per day). The noise impacts of passing trains are more pronounced during nighttime hours when ambient noise levels are lower and adjacent residents are sleeping. To reduce the noise impacts to adjacent sensitive residential land uses, the City of Cerritos requests that a mitigation measure be added requiring a reduction in hours of operation such that, within Cerritos, the line does not operate any earlier than 6:00 a.m. and any later than 10:00 p.m. CC-8-49

37. Requested Mitigation Measure – Employ Alternative Noise-Reducing Wheel and/or Rail Materials. The Draft EIS/EIR does not analyze alternative materials for the light rail vehicles or track rails that could have the potential to reduce noise impacts. The City of Cerritos requests that a mitigation measure be added requiring the implementation of alternative noise-reducing wheel and/or rail materials that eliminate potential noise impacts. CC-8-50

Hazards and Hazardous Materials

38. Requested Mitigation Measure – High Pressure Gas Pipeline in Right-of-Way. The City of Cerritos has granted a franchise to Kinder Morgan (successor in interest to Santa Fe Pacific Pipeline Partners) for the operation of a high pressure gas pipeline in Cerritos. According to City of Cerritos records, a portion of the subject pipeline runs through the LACMTA right-of-way, entering Cerritos from Bellflower across the San Gabriel River and continuing to Artesia Blvd. The Draft EIS/EIR does not disclose the existing high pressure gas pipeline or analyze its potential impacts on the design, construction, and operation of the project. In light of the pipeline's existence, the City of Cerritos is concerned about the safety of surrounding residents and businesses in connection with the proposed demolition of the existing railroad bridge that traverses the San Gabriel River as well as the construction of project facilities in this area. The City of Cerritos requests that LACMTA ascertain the specific location of the subject pipeline and design the project accordingly. Additionally, the City of Cerritos requests that a mitigation measure be added requiring coordination with the current pipeline owner to ensure public safety at all times during construction and ongoing operation.

CC-8-51

Water Resources

39. Requested Mitigation Measure – Reclaimed Water Distribution. The City of Cerritos operates a reclaimed water distribution system that irrigates all parks, street medians, and arterial parkways in Cerritos, all ABC Unified School District schools, and facilities in other cities including the Forest Lawn Cemetery in Cypress. In light of ongoing drought conditions in California and anticipated future droughts, the City of Cerritos requests that a mitigation measure be added requiring the installation of infrastructure within the extent of the LACMTA right-of-way to allow for the expansion of the existing reclaimed water distribution system to reduce demand on potable water. Additionally, reclaimed water shall be used to irrigate LACMTA property and station locations along the WSAB Transit Corridor and for any toilet facilities provided for staff and passengers. Reclaimed water shall also be made available to local municipalities along the corridor to reduce potable water use throughout the Gateway Cities region. This would function as a "green", environmentally friendly measure designed to offset the overall environmental footprint of the project.

CC-8-52

Energy

40. Requested Mitigation Measure – Local Electric Utility Patronage. The City of Cerritos requests that a mitigation measure be added requiring LACMTA to utilize power generated by local utility providers along the WSAB Transit Corridor, including the Cerritos Electric Utility, to energize the WSAB project. This measure would demonstrate a cooperative spirit by LACMTA in support of local utilities, while reducing operating costs for LACMTA due to the lower rates offered by local utility providers like the Cerritos Electric Utility.

CC-8-53

Economic and Fiscal Impacts

41. Inadequate Analysis of Economic Development Potential Among Alternatives. In the evaluation of the various project alternatives, the Draft EIS/EIR fails to analyze the degree to which each alternative would spur economic development. For example, Alternatives 1 and 2, which connect the southeast cities of Los Angeles County to the financial and employment center of Downtown Los Angeles, would bring more opportunities for economic development at the various stations along the corridor due to the improved connectivity to Downtown Los Angeles. Such connectivity is diminished by Alternative 3, which is the alternative currently recommended by LACMTA staff, and further lessened by Alternative 4, because in both of these alternatives the transit line would not adequately connect to Downtown Los Angeles. One incentive for corridor cities (the majority of which are "No-Low Property Tax" cities that receive one-third of the property tax revenue received by other cities) to support the WSAB Transit Corridor project and for cooperating with the location of stations in their respective communities is economic development. The City of Cerritos requests that the Draft EIS/EIR be revised to analyze the economic development potential among project alternatives and the associated economic and fiscal impact of such development. Economic development opportunities for local municipalities should be considered a primary factor in selecting the Locally Preferred Alternative rather than available project funding and self-imposed deadlines alone. CC-8-54

42. Inadequate Analysis of Impact on Local Revenues. In the analysis of potential impacts of the project on local government revenues, the Draft EIS/EIR focuses on property tax as a measure of impact. The City of Cerritos is a "No-Low Property Tax" city, and the proportion of the City of Cerritos' revenues from property taxes is very low (in fact, one of the lowest among the cities along the WSAB Transit Corridor). Therefore, property tax is a poor measure of economic impact for the City of Cerritos. In contrast, sales tax is a significant component of the City of Cerritos' revenue base, and impacts on sales tax generation in Cerritos could be detrimental to the City of Cerritos. However, the Draft EIS/EIR fails to analyze adverse impacts of the project on sales tax revenue to local jurisdictions, both during construction and on an ongoing basis, as a result of the proposed at-grade crossings that impair access to retail properties. The City of Cerritos is concerned that the proposed at-grade crossings at Studebaker Rd. and Artesia Blvd., with their associated wait times during train crossings, will deter customers from accessing nearby sales-tax-producing businesses at Los Cerritos Center, Plaza 183, and other commercial shopping centers in the vicinity. Accordingly, the City of Cerritos requests that the Draft EIS/EIR be revised to include a comprehensive analysis of the project's impacts on local sales tax revenue during construction and as a result of ongoing frequent and excessive wait times at grade crossings. CC-8-55

43. Requested Mitigation Measure – Shuttles to/from Los Cerritos Regional Commercial Shopping District. The City of Cerritos requests that a mitigation measure be added requiring LACMTA to operate shuttles between Pioneer Station and the Los Cerritos Regional Commercial Shopping District, including Los Cerritos Center, Plaza 183, Cerritos Auto Square and the surrounding retail commercial uses located in the area, to reduce associated traffic impacts while offsetting the loss of local revenues caused by other impacts of the project. CC-8-56

44. Failure to Assess Loss of Business During Construction. While the Draft EIS/EIR analyzes impacts resulting from property acquisitions and displacements, the Draft EIS/EIR does not disclose the economic and fiscal impacts to remaining businesses during construction. Temporary street closures and other construction inconveniences will impede access to and/or discourage customers from patronizing existing businesses. The City of Cerritos requests that the Draft EIS/EIR be revised to analyze the economic and fiscal impacts to existing businesses and mitigate those impacts. Please refer to the requested mitigation measures under the "Construction Impacts" section of this letter. Additionally, transportation funding should be made available to local businesses and the City of Cerritos to offset the loss of business and sales tax revenue during construction (see the requested mitigation measure regarding Business Interruption Assistance in the "Construction Impacts" section of this letter). CC-8-57

Safety and Security

45. Requested Mitigation Measure – Enhanced Safety Near Schools. The City of Cerritos requests that a mitigation measure be added requiring the incorporation of two-way pedestrian barriers at the Artesia Blvd. and Studebaker Rd. crossings, which are located in close proximity of Valley Christian Schools and Gahr High School, to protect students from unsafe conditions within the right-of-way. The mitigation measure shall also require LACMTA to fund crossing guards, additional safety signage, and train safety training at the nearby schools in accordance with the Safe Routes to School initiative. CC-8-58

46. Adverse Impact on Los Angeles County Sheriff Services. The City of Cerritos, along with other adjacent cities, contracts with the Los Angeles County Sheriff's Department (LACSD) for policing services. LACSD also provides policing services to LACMTA at its transit stations and along its transit corridors. In light of this, the City of Cerritos is concerned that LACSD deputies assigned to Cerritos will be pulled from their regular ongoing duties in order to respond to the safety needs of the new Pioneer Station, which would impact the effectiveness of responding to other policing needs in Cerritos. The City of Cerritos requests that the Draft EIS/EIR be revised to analyze the impacts of the project on local policing services in Cerritos. The City of Cerritos further requests that a mitigation measure be added requiring LACMTA to provide funding to corridor cities to offset the additional demand on policing services in connection with the project. CC-8-59

Construction Impacts

47. Requested Mitigation Measure – Business Interruption Assistance. The City of Cerritos requests that a mitigation measure be added requiring LACMTA to establish a business interruption assistance fund and assign LACMTA staff to disburse funding to local businesses whose incomes are adversely affected by construction. Additionally, funding should be made available to the City of Cerritos to help offset the loss of sales tax revenue resulting from adverse impacts to local business operations and reduced business activity during construction. LACMTA previously implemented similar business assistance measures in connection with D/Purple Line, Crenshaw/LAX Line, and Regional Connector construction. CC-8-60

48. Requested Mitigation Measure – No Construction from Mid-November to Early January. The City of Cerritos requests that a mitigation measure be added requiring that all construction activities within public streets, including interim lane closures, be prohibited between mid-November and early January each year during construction, to prevent adverse economic impacts to local businesses in and around Los Cerritos Center during the primary holiday shopping season and to prevent related impacts to City of Cerritos sales tax revenue. This "holiday construction freeze" is consistent with practices already employed by shopping center owners for their tenants throughout the community. CC-8-61

Growth-Inducing

49. Erroneous Assumption Regarding Cerritos Housing Units. Table 4.20.1 (pg. 4-822) of the Draft EIS/EIR identifies a reduction in housing units in Cerritos from 2000 to 2017; however, this information is entirely incorrect. The number of housing units in Cerritos in fact increased by approximately 778 units as a result of several housing developments that were constructed during that time period. The City of Cerritos requests that the Draft EIS/EIR be revised to correct this data and any related growth analysis resulting from this information. CC-8-62

Cumulative Impacts

50. Los Cerritos Center Expansion. Macerich, the owner of Los Cerritos Center, is currently preparing to expand the shopping center at the location of the former Sears department store. The City of Cerritos announced these plans at its State of the City presentation in 2019. (See the attached project renderings.) The planned expansion will include the construction of a new hotel, apartments, and new retail and restaurant amenities on the mall campus. The City of Cerritos requests that the Draft EIS/EIR be revised to analyze the cumulative impacts of the WSAB Transit Corridor project on the Los Cerritos Center expansion. CC-8-63

Environmental Justice

51. Requested Mitigation Measure – Incorporate Broadband Conduits into Right-of-Way. The City of Cerritos requests that a mitigation measure be added requiring the installation of broadband conduits into the LACMTA right-of-way in an effort to improve broadband access to underserved Gateway Cities communities. The Gateway Cities COG recently initiated the development of a Broadband Master Plan toward this end. By utilizing its right-of-way resource to improve broadband access for area residents and businesses, LACMTA would assist in reversing current injustices associated with broadband access. CC-8-64

52. Human Health. Cerritos is traversed by two major freeways that carry goods movement traffic to and from the Ports of Los Angeles and Long Beach. Existing particulate matter impacts posed by the existing freeways will be exacerbated by brake dust, added project traffic, and traffic idling, as discussed throughout this letter. By implementing a below-grade project, as well as the other mitigation measures requested in this letter, LACMTA would improve the human health effects of the project on existing communities along the corridor. Failure to implement these mitigation measures is likely to result in increased adverse effects to human CC-8-65

health, which is contrary to NEPA and CEQA standards. Accordingly, the City of Cerritos reiterates its request for a below-grade project as well as the various mitigation measures contained in this letter. Alternatively, the project might be ended in Bellflower until funding for an underground project through Cerritos can be identified. CC-8-65

Other Comments

53. Preference for Alternative 1. Provided that a below-grade design is accommodated in Cerritos, the City of Cerritos prefers Alternative 1 among the four alternatives presented in the Draft EIS/EIR. With a "one-seat ride" from Pioneer Station in Artesia to Union Station in Downtown Los Angeles, Alternative 1 would generate the most ridership and most closely fit the vision for the WSAB Transit Corridor that the City of Cerritos had when it began its involvement in planning the corridor over 30 years ago. CC-8-66 Furthermore, the City of Cerritos believes that Alternative 1 – Design Option 2, which includes the addition of the Little Tokyo Station, has the greatest potential for improving regional connectivity and spurring economic development along the corridor and would thus result in the greatest positive economic impact to corridor cities. CC-8-67

54. Opposition to Local 3% Contribution. The City of Cerritos opposes LACMTA's request for corridor cities to contribute funds totaling 3% of the total project cost including the cost of improvements located within the City of Los Angeles. Such local contributions have already been made through the use of Measure M funds, which come from sales tax generated by local communities along the corridor. Additionally, local governments will need to use their limited remaining funds toward supporting local services including public safety and roadway maintenance, which will be further burdened and impacted by the proposed WSAB project. CC-8-68 The City of Cerritos requests that LACMTA eliminate the cost of improvements located within the City of Los Angeles and that the local 3% contribution for southeast Los Angeles County corridor cities be comprised of a combination of Measure R and Measure M funding, federal and state grant monies, and private investment sources to cover the cost of the project.

The City of Cerritos respectively requests that these comments be addressed in connection with the proposed project and that the analysis in the Draft EIS/EIR and related appendices be further revised accordingly. CC-8-69

Sincerely,

Art Gallucci
City Manager
City of Cerritos

Attachments
1. Willdan memorandum dated September 20, 2021
2. Prior letters to LACMTA
3. Cerritos Bikeway Master Plan
4. Los Cerritos Center Expansion Project Renderings

cc Cerritos City Council
Bill Ihrke, City Attorney
Michael Colantuono, Special Counsel
Torrey Contreras, Senior Assistant City Manager
Kanna Vancheswaran, Director of Public Works/Water and Power
Robert A. Lopez, Director of Community Development
Kristin Aguila, Advance Planning Manager
Los Angeles County Metropolitan Transportation Authority Board of Directors
Michael R. Kodama, Executive Director, Eco-Rapid Transit
Nancy Pfeffer, Executive Director, Gateway Cities Council of Governments
WSAB project e-mail: *wsab@metro.net*

ATTACHMENT 1

WILLDAN

Memorandum

TO:	Kanna Vancheswaran, P.E, Director of Public Works, Water & Power/City Engineer
FROM:	Tyrone Peter, Willdan Engineering
DATE:	September 20, 2021 (revised)
SUBJECT:	Review of Selected Chapters of the West Santa Ana Branch (WSAB) Transit Corridor Draft EIS/EIR for the City of Cerritos

This memo consolidates the comments by Willdan Engineering staff regarding the WSAB Environmental Impact Statement/Environmental Impact Report (EIS/EIR). We have focused our review on the issues that Mr. Kanna Vancheswaran outlined in his email of August 11, 2021 and have assumed that our comments will be incorporated into a comprehensive letter from the City to the Los Angeles County Metropolitan Transportation Authority (Metro). Mr. Vancheswaran focused on transportation, noise and vibration impacts. He also asked us to comment regarding the potential loss of privacy along the proposed grade-separated alignment at the intersection of Gridley Road and 183rd Street. Our comments regarding noise and vibration impact analysis are limited by lack of direct expertise in acoustical engineering; however, we have added comments highlighting deficiencies in the EIS/EIR analysis regarding whether the EIS/EIR adequately mitigates impacts with respect to City of Cerritos residential neighborhoods along the alignment. Due to time constraints, we have focused our comments on the Metro staff preferred alternative No. 3 (All alternatives include the route alignment through Cerritos.) CC-8-70

A. Opportunities to Enhance Regional Benefit:

1. Recycled water lines: The EIS/EIR discusses utility *relocations* and "various new utilities [to] be installed as part of the Project" in section 4.19.2.3, p. 4-609. Cerritos requests that Metro include corridors for recycled-water lines along the Metro route so that they are available for municipalities to avail of reclaimed water in the future. Cerritos generates recycled water and would connect to these lines if available. CC-8-71
2. Fiber-optic lines: Cerritos requests that the new utilities noted above include fiber-optic line capacity within the Metro corridor.
3. Should the project advance, Cerritos requests that Metro consider using electricity for the project obtained from Cerritos Electric Utility (CEU) for segments of the project that lie within the City of Cerritos at a minimum. In the future, the Metro right-of-way can present an opportunity for other jurisdictions that this project traverses to extend infrastructure and obtain reliable and possibly discounted electricity from the CEU. CC-8-72

B. Transportation/Traffic Engineering Comments

1. General Comments CC-8-73
   a) The Draft EIS/EIR does not show a station in the City of Cerritos. Although the City of Cerritos requested in or about 2017 that a station not be constructed within the City, the City Council in 2018 formally asked Metro to include Studebaker Road at the Metro

alignment south of Artesia Boulevard as an alternative station location (*see letter to Mr. Manjeet Ranu, June 22, 2018, attached and Ms. Julia Brown, November 7, 2018*). The EIS/EIR does not show a station at this location, does not explain whether it was considered and rejected, or whether it was considered at all. The City hereby repeats the request that a station at Studebaker Road in the City of Cerritos be considered and evaluated. CC-8-73

b) The City of Cerritos requests that all at-grade crossings within the City be constructed as "quiet zones". CC-8-74

c) There are pages that appear to be left blank intentionally. Please identify these pages appropriately (see Page A6-2 for example). CC-8-75

d) Tables showing Headways do not clarify that headways are in minutes. Sample see Table 5.17. CC-8-76

2. Appendix D – Transportation Impact Analysis Report

a) Page 1-6, last paragraph – The paragraph begins with "Figure 1-2". This is the wrong reference. Should this be Figure 1-1?

b) Section 1.5.1, Analysis Approach: Traffic Operations (Page 1-7) – What are the default value inputs used for coding the HCM/Synchro model analysis? Program default values may not represent study locations and should be adjusted to simulate actual field conditions. Section 9 References do not appear to include any analysis detail reports/studies. CC-8-77

c) Section 1.5.10, Applying LOS for Impact Assessment (Page 1-14) – How did the HCM/Synchro software simulate a rail crossing operation? It is our understanding that Synchro has limited ability to properly simulate a train crossing event. The main concern in using the Synchro software is that the schedule of events (an event is a train crossing and activating the gate) cannot be set and controlled in the model. So, even though headways of the trains are known, that information cannot be inputted into the model. The model generates vehicles randomly and as a result, a fixed set of assumptions and known conditions could generate different output results in separate runs. How many Synchro analysis runs were conducted to determine the delay and 95% vehicular queue for the study intersections? CC-8-78

d) Table 5.4 (Page 5-13) –Intersection #98, 188th St/Pioneer Blvd, located adjacent to the City of Cerritos, indicates footnote "d" for the Delay/LOS. What is footnote "d"? CC-8-79

e) Table 5.4 (Page 5-14) – Intersections #100 and #101 are incorrectly identified under the City of Cerritos' jurisdiction. Correct this mistake to show City of Artesia.

f) Table 5.5 (Page 5-16) – Artesia Blvd/Studebaker Rd and Business Ctr/Studebaker Rd Queue Analysis. How will these 2 intersections along with the crossing be coordinated to mitigate the queue length deficiency? What is the reason for not analyzing the queue length at Business Ctr/Studebaker Rd (future signalized location)? The southbound queue for Business Ctr/Studebaker Rd will be impacted when the gates are down at the crossing. CC-8-80

The Queue analysis does not adequately address the traffic flow impacts along major arterial streets in the City of Cerritos. Specific traffic studies should be conducted to determine traffic impacts of the WSAB project including stations along Artesia Boulevard, South Street, and Pioneer Boulevard. Any intersections experiencing a significant impact should be fully mitigated. CC-8-80

g) 5.4, Parking (Page 5-61) – What are the parking and traffic impacts of adding a 1,000+ space parking structure northwest of the intersection of Pioneer Blvd and South St?

Table 5.55 *Station Parking Facility Demand – Alternative 1* (Page 6-69) indicates the proposed Pioneer Station parking will not accommodate the Projected 2042 Parking Demand (deficient by 350 spaces).

The report concludes (Page 5-69): "However, unutilized on-street parking is available to meet the excess parking demand…[b]ased on the results of the analysis, spillover parking impacts would not occur at these four stations." **The City disagrees with this conclusion.** The use of on-street parking is a spillover parking impact of the WSAB project. The proposed mitigation measures (TRA-21: Parking Monitoring and Community Outreach, and TRA-22: Parking Mitigation Program (Permanent)) may be helpful but could be avoided if the parking supply at the Pioneer Station satisfies the estimated demand. The Pioneer Station should provide a parking supply to accommodate the Projected 2042 Parking Demand. CC-8-81

Spillover Parking Impacts (Page 5-68) identifies "Project Measure TR PM-10 (Pioneer Station Parking Access) would be implemented at the Pioneer Station to limit vehicles accessing the parking structure through the adjacent residential streets. There is no specific discussion on what exactly will be implemented to limit cut-through traffic into the residential neighborhoods adjacent to the Pioneer Station. What are the exact measures that would be implemented? It is important that the WASB project address this access issue to the satisfaction of the City and its residents. CC-8-82

h) 6.4.4, Alternative 3: Slauson/A (Blue) Line to Pioneer Station (Page 6-17) – The analysis of the emergency vehicle access does not specifically review direct impacts to businesses on Pioneer Bl, immediately north of the Pioneer Station and parking structure. When an event occurs (gates down for train), these businesses will be significantly impacted due to southbound queuing blocking access. How can this emergency vehicle access impact be addressed? CC-8-83

i) Section 8, Project Measures and Mitigation Measures (Page 8-28) – Intersection No. 89, Artesia Blvd/Dumont Av – TRA-18: Add westbound through lane. This mitigation measure does not address the impacts of the Artesia Boulevard segment to the east of this intersection. What is the LOS of the roadway segment to the east of Artesia Blvd/Dumont Av? Is this roadway segment significantly impacted? How far east can the additional westbound through lane be extended? Can the additional westbound through lane begin at Studebaker Rd? CC-8-84

j) Mitigation measures should include the expansion of the traffic signal coordination system currently in operation surrounding the Cerritos Mall. This includes traffic signals CC-8-85

at Pioneer Bl/South St and intersections on the approach to the Pioneer Station parking structure. Section 8.2.1.1 Traffic Operations indicated that traffic signal timing was optimized as part of the analysis. Implementing traffic signal coordination as part of the multi-step process should also provide mitigation benefits. CC-8-85

k) What are the traffic impacts from the Pioneer Station parking structure from neighboring cities including Lakewood, Cypress, La Mirada, Buena Park, Norwalk and Santa Fe Springs? A more detailed traffic impact analysis should be conducted at the following intersections: South St/Clarkdale Ave, South St/Norwalk Blvd, South St/Bloomfield Ave; South St/Alburtis Ave, South St/Gridley Rd, Pioneer Blvd/195th St, Pioneer Blvd/Los Coyotes Blvd, Pioneer Blvd/Del Amo Blvd, Pioneer Blvd/187th St, Pioneer Blvd/186th St, and Pioneer Blvd/183rd St. Analyzing these intersections will identify if additional measures need to be implemented to reduce impacts to the neighborhoods. CC-8-86

l) The WSAB project passes on, through or near several obsolete bridges, specifically, the bridges along Del Amo Blvd over Coyote Creek and along Artesia Blvd. over the San Gabriel River. The WSAB project should consider improving or widening the bridges affected by the project as these obsolete bridges continue to be a concern. CC-8-87

3. C. Project Aesthetics and other considerations

   i. The EIS/EIR should discuss post-construction settlement of the embankment supported by retaining walls for the aerial structure over Gridley Road and 183rd street. CC-8-88

   i. All sound walls and retaining walls must have anti-graffiti coating. The EIS/EIR should discuss requirements for routine maintenance to remove any graffiti on the walls to counter adverse visual impacts. CC-8-89

   ii. The project description should explain how the landscaping at retaining walls will be maintained to counter adverse visual impacts.

   iii. The project design should consider eliminating any confined space challenges with the proposed continuous closed abutment/retaining wall for the aerial structure north of Gridley Road and 183rd street. CC-8-90

   iv. The EIS/EIR does not clearly define the size, location and structure of the Traction Power Substation TPSS 02. How will the noise from TPSS be mitigated? CC-8-91

   v. The City of Cerritos is concerned about higher retaining walls and structures. Design of any proposed structures with the City of Cerritos' jurisdiction, including sound walls, elevated structures, subterranean structures or other enhancements will require City review and approval. CC-8-92

C. Noise and Vibration CC-8-93

1. At the beginning of Section 4.7, the DEIS/DEIR refers to "clusters" of sensitive land uses and lists impacts and mitigated impacts in Tables 4.7.7 through 4.7.10, but until Figures 4.7-5

through 4.7-11 there is no mention of where these clusters are. The document should alert the reader that the clusters are shown graphically in the respective Figures. Tables 4.7.7 – 4.7.10 should include a column labeled "City" adjacent to the column labeled "Cluster No." CC-8-93

2. Clusters No. N302-312 and N344-N347 are within the City of Cerritos. Table 4.7. lists impacts for all except N302, the Valley Christian School campus at 17700 Dumont Avenue (SE quadrant of the intersection of Artesia Blvd. and Dumont Ave.). Noise and vibration effects to this receptor should be identified in the body of the EIS/EIR, even if there are no anticipated impacts (Appendix M, Table 5.5, p. 5-26). Impacts to this receptor should be identified. The EIS/EIR also does not identify whether there are anticipated noise and/or vibration impacts that would extend to the Cerritos College campus, located generally in the northeast quadrant of the intersection of Studebaker Road and E. 166th Street. These impacts should be identified and if required, mitigated. CC-8-94

3. Efficacy of sound walls should be described within the EIS/EIR. Tables 4.7-4.7.10 show reductions in dBA and resulting levels of impact, but the text does not describe how sound work to accomplish impact reduction, and there are no graphics that show how sound is attenuated by walls of particular heights and distance from the source or receptor. Sound wall materials are not described. Moreover, Appendix M does not show sound-attenuation diagrams, nor does it describe how either surface-mounted or aerial sound walls work to mitigate impacts. The City requests that this information be included in the document. CC-8-95

4. Sound walls may also reflect sound to other receptors. Has this been considered? Reflected sound potential must be identified and mitigated. CC-8-96

5. There are several receptor sites where sound walls have been deemed infeasible (Table 4.7.8). The DEIS/DEIR presents no alternative mitigation measures, such as adding insulation and/or replacing windows of affected structures. Even where sound walls are indicated to be feasible, some impacts are still deemed "severe." Why are no additional mitigation measures suggested? Excessive noise and vibration must be mitigated to protect residents and other sensitive receptors. CC-8-97

6. The EIS/EIR does not discuss the noise and vibration impacts of cut-through traffic at two at-grade railroad intersections as well as those resulting from the new parking structure on Pioneer Blvd. These impacts must be identified and mitigated as necessary. CC-8-98

7. The DEIS/DEIR does not show noise contours along the projected WSAB route. Why? Noise contours should be illustrated, both for the proposed project and for nearby arterials where that information is available. CC-8-99

8. Are there alternative wheel materials that could be employed to reduce noise? The DEIS/DEIR does not discuss whether alternatives were considered, and if so, why they were rejected.

9. The DEIS/DEIR should describe how the "low-impact frogs" or ballast mats work, and whether there are additional measures that could be used to attenuate vibration where impacts would remain severe. CC-8-100

10. Mitigation Measure NOI-1, Soundwalls, states that "Soundwalls *would* be placed…" (emphasis added). Language like "shall" or "will" instead of "would" gives the reader a CC-8-101

greater degree of confidence that the measure will be implemented. The word "would" is not consistent with a mandatory measure.

11. Mitigation Measures NOI-2 through NOI-7 also use "would" instead of "shall." See comment 9.

CC-8-101

D. Loss of Privacy along WSAB elevated sections.

1. Section 4.2, Communities and Neighborhoods, does not discuss the loss of privacy potentially experienced by residents who live adjacent to elevated sections of track and adjacent to elevated TPSS locations. While the proposed 4' sound walls may be adequate to prevent riders from seeing into residences and back yards, the document does not provide information to illustrate this. Four-foot walls would also be inadequate to prevent TPSS maintenance crews from looking into private properties.

2. Cerritos requests that the EIS/EIR include cross-section illustrations that show a typical line-of-sight from seated and standing positions within a rail car and from a standing position at the tallest work location at a TPSS toward an adjacent property. If these cross-sections reveal that views into private property would not be substantially obstructed, mitigation measures must be added, such as taller screen walls and textural patterns on rail car windows to obstruct downward views.

CC-8-102

E. Safety Concerns

1. There are potential pedestrian-safety issues for Valley Christian school children at the intersection of the WSAB and Artesia Boulevard, adjacent to the intersection of Artesia Boulevard and Dumont. The EIS/EIR does not address these safety issues, and does not suggest additional mitigation measures, such as crossing guard funding, additional signage, orientation to train safety at the school, etc. Cerritos requests that this safety concern be addressed, and if required, mitigated.

CC-8-103

F. Construction and Construction Plans Comments

1. Appendix B: Final Advanced Conceptual Alignment Design Part 1.pdf (referred to as Part 1)

   a) Document sheets that apply to the City of Cerritos are:
   Drawing Nos. T-254 to T260; Pdf sheet nos. 122 to 128

      vi. Drawing T-255 (pdf page 123): The profile shows the Top of Rail several feet above grade at the crossing with Private Driveway and the plan view indicates "For Grade Crossing Details Refer to Grade Crossing Plans". The reference is to document Part 2 (Drawing No. CS-206, pdf sheet 15). Complete plans and details for this construction will be required.

      vii. Drawing T-256 (pdf page 124): The plan view shows an at grade crossing at Artesia Boulevard and the plan view indicates "For Grade Crossing Details Refer to Grade Crossing Plans". The reference is to document Part 2 (Drawing No. CS-214, pdf sheet 23). Complete plans and details for this construction will be required.

CC-8-104

viii. Drawing T-256 (pdf page 124): The profile view shows a low point between stations 1332+00 and 1333+00. The project must address any drainage mitigation required at this location. CC-8-105

ix. Drawing T-257 (pdf page 125): The plan view shows an at grade crossing at Studebaker Road and the plan view indicates "For Grade Crossing Details Refer to Grade Crossing Plans". The reference is to document Part 2 (Drawing No. CS-214, pdf sheet 23). Complete plans and details for this construction will be required. CC-8-106

x. Drawing T-257 (pdf page 125): The profile view shows a low point between stations 1345+00 and 1346+00. The project must address any drainage mitigation required at this location. CC-8-107

xi. Drawing T-258 (pdf page 126): The plan shows a proposed Sound Wall (8' Min) on the north side of the track alignment, beginning at approximate station 1355+00. The Sound Wall location and height has been compared to agree with document Appendix M-Noise and Vibration Impact Report Part 2.pdf (Appendix G). CC-8-108

xii. Drawing T-258 (pdf page 126): The profile view shows a low point between stations 1357+00 and 1358+00. The project must address any drainage mitigation required at this location. CC-8-109

xiii. Drawing T-259 (pdf page 127): The plan shows a proposed Sound Wall (8' Min) and a proposed Sound Wall (4' Min) on the north side of the track alignment. The Sound Wall location and height has been compared to agree with document Appendix M_Noise and Vibration Impact Report Part 2.pdf (Appendix G). Indicate the location where the Sound Wall transitions from 8' to 4' noting that it likely occurs on the retaining wall. CC-8-110

xiv. Drawing T-260 (pdf page 128): The plan shows a proposed Sound Wall (4' Min) on the north side of the track alignment. The Sound Wall location and height has been compared to agree with document Appendix M_Noise and Vibration Impact Report Part 2.pdf (Appendix G). CC-8-111

xv. Drawing T-260 (pdf page 128): The plan view shows a bridge crossing at Gridley Road and the plan view indicates "For Grade Crossing Details Refer to Grade Crossing Plans". The reference is to document Part 2 (Drawing No. CS-215, pdf sheet 24). CC-8-112

2. Appendix B: Final Advanced Conce CC-8-114 ıent Design Part 2.pdf (referred to as Part 2) CC-8-113

   a) Document sheets that apply to the City of Cerritos are:
   Drawing Nos. CS-206, CS-214 to CS-215; Pdf sheet nos. 15, 23 to 24

      i. See comments above.

3. Appendix B: Final Advanced Conceptual Alignment Design Part 3.pdf (referred to as Part 3) CC-8-114

a) Document sheets that apply to the City of Cerritos are:
Drawing Nos. R-1-189 to R-1-195, Pdf sheet nos. 124 to 130

ii. Drawing R-1-189 (pdf page 124); As stated in Note 1: "To be determined whether an aerial easement will be required over San Gabriel River." The easement determination must be addressed. CC-8-114

iii. Drawing R-1-190 (pdf page 125); It is noted that a Permanent Surface Easement (SE) is indicated at Artesia Boulevard.

iv. Drawing R-1-191 (pdf page 126); It is noted that a Permanent Surface Easement (SE) is indicated at Artesia Boulevard. CC-8-115

v. Drawing R-1-191 (pdf page 126); As stated in Note 1: "To be determined whether a subsurface easement will be required over I-605." It is noted that this note should indicate "beneath I-605". The easement determination must be addressed. CC-8-116

vi. Drawing R-1-192 (pdf page 127); It is noted that a Permanent Surface Easement (SE) is indicated at Studebaker Road. CC-8-117

vii. Drawing R-1-194 (pdf page 129); It is noted that a Permanent Aerial Easement (AE) and Temporary Construction Easement (TCE) are indicated at the intersection of Gridley Road and 183rd Street. CC-8-118

viii. Drawing R-1-195 (pdf page 130); It is noted that a Permanent Aerial Easement (AE) and Temporary Construction Easement (TCE) are indicated at the intersection of Gridley Road and 183rd Street. CC-8-119

G. Conclusion

The City of Cerritos strongly requests that Metro address and mitigate the above concerns. Impacts associated with traffic and transportation, noise and vibration, safety, aesthetics, privacy, and deficiencies in the conceptual project drawings are of critical concern to Cerritos residents. While Cerritos understands that any project such as the proposed WSAB line will *change* the existing environmental baseline, significant adverse changes must be avoided or mitigated as much as possible. CC-8-120

The City further requests that Metro address the opportunities for regional benefit identified above, whether in the environmental document or in the project design going forward.

Thank you for the opportunity to review and comment on this important regional project. Please keep the City apprised of all documents, community meetings, and public hearings on the project as it moves forward.

ATTACHMENT 2

CITY OF CERRITOS SM

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Cerritos All-America City 2008

April 20, 2018

LA County Metropolitan Transportation Authority
Attention: Mr. Manjeet Ranu
Metro Senior Executive Officer
Countywide Planning & Development
One Gateway Plaza
Mail Stop: 99-22-1
Los Angeles, CA 90012-2952

Subject: **CITY OF CERRITOS COMMENTS REGARDING THE LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY'S PROPOSED WEST SANTA ANA BRANCH (WSAB) TRANSIT CORRIDOR PROJECT – SOUTHERN ALIGNMENT**

Dear Mr. Ranu:

Over the past several months the City of Cerritos has been provided information related to Los Angeles County Metropolitan Transportation Authority's ("Metro") West Santa Ana Branch (WSAB) transit corridor project proposed along the former Southern Pacific Electric, Metro-owned right-of-way that traverses through the City of Cerritos. Specifically, the City of Cerritos, acting as a community stakeholder and in the best interest of Cerritos residents, has attended and participated in a number of Metro-sponsored meetings and has had several discussions with Metro and other project-related staff to learn about Metro's plans for the subject transportation corridor in order to make informed recommendations for City Council consideration about whether or not to support the WSAB transit corridor proposal. The City would like to thank Metro staff for providing the City of Cerritos with the opportunity to express its concerns about the dissemination of information to the general public by Metro during the public scoping process for the northern alignment pertaining to the potential location of two light rail stations within the jurisdictional boundaries of the City of Cerritos without the City's prior knowledge, consent or approval. During the meetings held on April 2, 2018 and April 6, 2018, the City of Cerritos conveyed its preference for a below-grade transportation system versus Metro's preferred at-grade light rail technology due to the WSAB's proximity to existing sensitive residential land uses in Cerritos, adverse traffic impacts associated with numerous at-grade crossings and the proposed displacement of existing commercial uses to accommodate large parking structures for proposed station locations in Cerritos and Artesia.

While Metro has begun the preliminary planning phase of such proposal, including public outreach efforts, the preparation of an environmental analysis in conformance with California Environmental Quality Act (CEQA) requirements, and the preparation of a transit-oriented development strategic implementation plan for cities along the proposed corridor, the City of Cerritos would like to hereby provide Metro with some detailed background

information related to the City's participation in pursuit of a rail line along the subject corridor, provide initial comments and feedback related to Metro's proposed WSAB transit corridor project, and also provide recommendations for Metro's public outreach efforts to elected officials and property owners of the City of Cerritos.

History of Cerritos' Participation in Corridor Proposals

As you are likely aware, in April 2002, Southern California Association of Governments (SCAG) and the Gateway Cities Council of Governments (Gateway COG) initiated a feasibility study for a proposal to develop a high-speed magnetic levitation (maglev), grade separated train line along Metro's right-of-way, in an attempt to promote connectivity between Los Angeles County and Orange County. The proposed use of above-grade maglev technology would enable high-speed travel without some of the environmental impacts associated with traditional steel-on-steel rail or bus technologies and would eliminate numerous potentially hazardous at-grade intersection crossings along the route. Known as the Orange Line, the proposed elevated maglev train was proposed to run from Downtown Los Angeles through the southeast portion of Los Angeles County, through the City of Cerritos.

In an effort to facilitate an efficient and viable opportunity for use of the former right-of-way for the proposed Orange Line, and in order to utilize resources from each jurisdiction along the proposed line, the City of Cerritos, in conjunction with SCAG and the Gateway COG, formed a joint powers authority (JPA). The newly established JPA, named the Orange Line Development Authority (OLDA), was responsible for planning, obtaining financing, acquiring and constructing transportation facilities, and issuing bonds to provide funds for the proposed Orange Line project. Given that the proposed route for the project diagonally bisected the City of Cerritos within the right-of-way, with a majority of the Cerritos portion of the route running immediately adjacent to sensitive residential land uses, the City joined the OLDA in an effort to preserve and protect residential uses from potentially negative impacts. OLDA and its twenty-two (22) members, including the City of Cerritos and Metro, worked over the succeeding ten (10) years to narrow down the scope of the project, assess the feasibility of the project, and to secure funding for the project. During this time, in 2012, the OLDA changed its name to Eco-Rapid Transit.

Further, in 2012 SCAG, as a member of Eco-Rapid Transit, completed an alternatives analysis for the use of the right-of-way that considered potential alternative transit modes for the corridor, including light-rail, busway and low-speed maglev. Ultimately, SCAG did not recommend maglev as a preferred option and instead included at-grade light rail as a preferred alternative for the route. As a result of SCAG's analysis, Eco-Rapid Transit revised the proposal for the abandoned right-of-way and took formal action to move away from the use of maglev technology, and instead, supported SCAG's preference to utilize low-speed, at-grade light rail for use throughout the corridor. Given the significant change in the scope of the project and the potential for substantial environmental impacts associated with the newly proposed light rail technology supported by Eco-Rapid Transit, the City of Cerritos unanimously voted to withdraw its membership and participation in Eco-Rapid Transit in September 2014.

WSAB Transit Corridor Project

In 2017, City staff was contacted by Metro staff regarding the preparation of an environmental assessment, in the form of an Environmental Impact Report, for the proposed at-grade light rail transit line that is now named the West Santa Ana Branch

Transit Corridor Project. In addition, the City was informed about the preparation of a Transit Oriented Development (TOD) Strategic Implementation Plan to provide a unified land-use and economic development strategy for communities along the transportation corridor. Discussions and documents provided to the City by Metro for both the environmental assessment and the TOD strategic implementation plan included proposals for station locations in the City of Cerritos, locations for parking facilities or parking structures to support the proposed station locations in Cerritos and the City of Artesia, and the proposed use of at-grade light rail technology along the corridor, traversing through the City of Cerritos.

Metro-Proposed Station Locations

As identified in initial documents supporting the environmental analysis, as well as in initial TOD strategic implementation plan documents, Metro is proposing two (2) station locations in the City of Cerritos. The first, located within the right-of way and on adjacent commercial properties at the northwest corner of Gridley Road and 183rd Street ("Metro-Proposed Cerritos Station 1"). The second, proposed by Metro as the southernmost terminus, located within the right of way and on adjacent commercial property at the northeast corner of Bloomfield Avenue and Del Amo Boulevard ("Metro-Proposed Cerritos Station 2"). Both station locations have not been reviewed, solicited, or considered by the Cerritos City Council, affected commercial property owners, as well as adjacent and surrounding Cerritos residential property owners. In addition, the Metro-proposed station locations in Cerritos currently consist of regional commercial properties that contribute to the City's economic development efforts in the City of Cerritos, including sales tax generation, decreasing the City's unemployment rate, and providing various consumer shopping opportunities. Further, the proposed transit corridor project identified in both initial documents proposals to feature a station location in the City of Artesia, generally located in Artesia's downtown district along Pioneer Boulevard, within ±0.6 miles of the Metro-Proposed Cerritos Station 1 and within ±1.2 miles of the Metro-Proposed Cerritos Station 2, therefore not necessitating station locations in the City of Cerritos due to the close proximity of such stations to the proposed Artesia station location.

It is for these reasons that the City of Cerritos currently does not support any of Metro's proposed station locations and/or parking structures in the City of Cerritos, nor the proposal for the Metro-Proposed Cerritos Station 2 to be the southernmost terminus of the proposed line.

Metro-Proposed At-Grade Light Rail Technology

Utilization of at-grade light rail technology along the WSAB transit corridor, as identified as the method in Metro's initial documents, may generate significant impacts to residential land uses directly adjacent to the right-of-way, by way of increased noise and vibration associated with the operation of this technology. Further, the technology would not be grade separated, thereby creating approximately eight (8) grade crossings along the route within Cerritos. These grade crossings would create traffic impacts resulting in potential safety hazards for pedestrians and motorists in the area and the potential for a decline in consumer spending due to accessibility constraints to the City's major commercial shopping centers adjacent to the proposed light rail line.

It is for these reasons that the City of Cerritos currently does not support an at-grade light rail line along the corridor, due to the potential noise, traffic, and environmental impacts to residential uses and the Cerritos community. Nevertheless, the City would entertain for

further consideration the potential use of the right-of-way for a below-grade transit line, given that a below-grade transit line would significantly reduce any of the aforementioned impacts in the City of Cerritos and its residents.

Metro-Proposed Locations for Parking Facilities/Structures

Parking structures or parking facilities to support Metro-proposed stations, as identified in initial documents supporting the environmental analysis and the TOD strategic implementation plan, proposed on privately-owned land in the City of Cerritos, thereby displacing existing Cerritos sales tax generating commercial properties, is not supported by the City of Cerritos. Specifically, parking structures or parking facilities to support the rail line at the Los Cerritos Center, Plaza 183 shopping center, or other commercial properties to support the Metro-proposed stations in Cerritos, should not be proposed without the prior consent of, or outreach to, the respective Cerritos property owners. In addition, any proposal for a station in the City of Artesia, shall include the supporting parking structures or parking facilities located wholly within the jurisdictional boundaries of the City of Artesia, rather than locating said parking facilities to support the Artesia station within the City of Cerritos as currently proposed.

Metro's Public Outreach Efforts

As previously mentioned, the City of Cerritos does not currently support the location of stations in Cerritos, the location of parking structures or parking facilities on existing privately-owned commercial properties to support proposed stations, nor the proposed utilization of an at-grade light rail traversing through the City of Cerritos for the reasons contained herein. As previously communicated to Metro on several occasions, Metro's proposal under the preliminary environmental documents and preliminary TOD strategic implementation plan documents has yet to be reviewed or considered by the Cerritos City Council, and it is recommended that Metro focus public outreach efforts to the Cerritos City Council to obtain policy direction related to the concerns mentioned herein. In addition, the City of Cerritos recommends that Metro seek public input from Cerritos residential and commercial property owners located directly adjacent to the existing right-of-way corridor.

Please be assured that the City of Cerritos will continue to participate in Metro-held and sponsored meetings, events, and discussions related to the proposed rail line, in an effort to ensure that the interests of the Cerritos community are protected throughout this process. City staff is hopeful that the position of the City relative to the proposed at-grade light rail line will be accurately reflected and incorporated in the environmental assessment and in the TOD strategic implementation plan relative to the overall design and use of the right-of-way corridor.

Should you have any questions regarding the City's initial position on this matter and/or questions related to obtaining policy direction from the Cerritos City Council, please feel free to contact me in the Department of Community Development at (562) 916-1201.

Sincerely,

Kristin Aguila
Advance Planning Manager

cc Cerritos City Council
Art Gallucci, City Manager
Torrey N. Contreras, Director of Community Development
Kanna Vancheswaren, Director of Public Works
Monica Born, Metro Deputy Executive Officer
Laura Cornejo, Metro Deputy Executive Officer
Julia Brown, Metro Community Relations Manager
Terri Slimmer, Metro Senior Manager
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CITY OF CERRITOS

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Cerritos All-America City 2008

OFFICE OF THE CITY MANAGER
ART GALLUCCI

June 22, 2018

LA County Metropolitan Transportation Authority
Attention: Mr. Manjeet Ranu
Metro Senior Executive Officer
Countywide Planning & Development
One Gateway Plaza
Mail Stop: 99-22-1
Los Angeles, CA 90012-2952

Subject: **CERRITOS CITY COUNCIL'S DIRECTION RELATED TO LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY'S (METRO) WEST SANTA ANA BRANCH (WSAB) TRANSIT LIGHT RAIL CORRIDOR PROJECT IN RESPONSE TO METRO'S PRESENTATION AT THE JUNE 14, 2018 CITY COUNCIL MEETING**

Dear Mr. Ranu:

On behalf of the City of Cerritos, I would like to express my sincere appreciation to Metro staff for extending Metro's public outreach efforts to the Cerritos City Council and the Cerritos community related to Metro's proposed West Santa Ana Branch (WSAB) transit light rail corridor project. The presentation that Metro provided to the City Council and the Cerritos community at the June 14, 2018 City Council meeting, providing details about the Metro-proposed project and opening discussion with the Cerritos community, will serve to benefit Metro in the public scoping process for its preparation of environmental assessment and transit oriented development (TOD) strategic plan studies related to the proposed light rail project.

As you are aware, the City's portion of the presentation provided the City Council with background information related to the City's participation in Metro/Eco-Rapid Transit's joint powers authority (JPA) and related studies for use of the Metro-owned former Southern Pacific Electric right-of-way for rail purposes. After completion of City staff's and Metro's presentations, the Cerritos City Council affirmed staff's recommendations and provided direction to Metro as follows:

PARTICIPATION BY THE CITY OF CERRITOS IN METRO'S ENVIRONMENTAL AND TOD STRATEGIC PLAN STUDIES

After consideration, the Cerritos City Council authorized the City of Cerritos to participate in Metro's environmental analysis and TOD strategic plan studies, in order to minimize potential impacts to the City and its community resulting from the Metro-proposed light rail project. As such, the City of Cerritos would like to request that City staff be notified of any Metro, Eco-Rapid Transit, or any associated consultant held meetings or workshops related to the environmental analysis or TOD strategic plan studies, or any other studies that have

the potential to impact the City of Cerritos or its residents, including any assessment of station locations or parking facilities to support station locations in the City of Cerritos or the City of Artesia.

Despite the City's position in opposition of a potential station being located in the City of Cerritos, and the City's opposition to an at-grade light rail traversing through its boundaries, the Cerritos City Council decided in favor of supporting Metro's station location study, as well as the environmental assessment, provided that Metro include an alternative station location adjacent to Studebaker Road and also the Del Amo Boulevard realignment project in such studies, as further described below.

ALTERNATIVE STATION LOCATION

During City staff's presentation at the June 14, 2018 City Council meeting, staff recommended that Metro include in its environmental assessment an alternative station location, in an effort to study the potential impacts of an alternative station, other than those previously proposed by Metro. The alternative station location, generally located along the right-of-way at Studebaker Road, south of Artesia Boulevard, is recommended to be studied by Metro due to its proximity to the 605 Freeway, and in light of the fact that the area is primarily comprised of industrial or commercial uses, and is buffered from residential land uses. In addition, the recommended alternative station location area has potential for future economic development and reuse opportunities consistent with Metro's objectives identified in the TOD strategic plan study. While the City does not currently support a station location in Cerritos, it may be worthwhile for Metro to consider this alternative, in order to properly assess environmental impacts of this alternative potential station location. After consideration of staff's recommendation, the Cerritos City Council affirmed this recommendation and directed Metro to include an assessment of this alternative station location, provided that this alternative station or any other Metro-proposed stations in Cerritos be identified as secondary station types, with less frequent stops and intervals than other along the entire corridor.

ENVIRONMENTAL ANALYSIS FOR THE DEL AMO BOULEVARD REALIGNMENT PROJECT

In addition to an alternative station location, the City Council recommended that Metro expand its environmental analysis to include the re-alignment of Del Amo Boulevard at the County line, inclusive of the Del Amo Bridge. As you may be aware, the cities of Cerritos, Lakewood, La Palma and Cypress wish to replace the Del Amo Boulevard Bridge over Coyote Creek due to pedestrian and vehicular access concerns, and safety concerns with the curvilinear alignment of this area that transects the Metro-owned right-of-way. In order to re-align this area of the City, an environmental assessment of this realignment project will be required to be completed, and given that the right-of-way directly intersects this project area, it is recommended that Metro include the assessment in its environmental analysis for the proposed line. As such, City staff will provide information related to the Del Amo Boulevard realignment project to Metro, by way of separate correspondence, for incorporation in the WSAB transit corridor project's environmental assessment study.

COMMUNITY WORKSHOP

Lastly, at the meeting, the Cerritos City Council authorized and recommended that Metro host a community workshop in the City of Cerritos in the coming weeks to solicit input from the Cerritos community and stakeholders, including those directly adjacent to the corridor,

related to the southern alignment of the proposed WSAB transit corridor light rail project. The City of Cerritos will attend the workshop in an effort to obtain feedback from Cerritos stakeholders, and will provide assistance to Metro as needed. The City appreciates your interest in broadening Metro's public outreach efforts to include residents and businesses at a community workshop.

Again, thank you for providing information to the Cerritos City Council and community related to the proposed southern alignment. The City of Cerritos is hopeful that with the incorporation of the City of Cerritos' comments, recommendation, and City Council policy direction contained herein, Metro staff can continue its efforts in facilitating the required environmental assessment and TOD strategic plan studies, which participation by affected communities. Should you have any questions related to City Council's direction, or any information contained herein, please do not hesitate to contact Advance Planning Manager Kristin Aguila at (562) 916-1201 or by email at kaguila@cerritos.us.

Sincerely,

Art Gallucci
City Manager

cc Cerritos City Council
Los Angeles County Supervisor Janice Hahn
Lynda Johnson, Field Deputy, Supervisor Hahn Bellflower Field Office
Torrey N. Contreras, Director of Community Development
Kanna Vancheswaren, Director of Public Works
Kristin Aguila, Advance Planning Manager
Monica Born, Metro Deputy Executive Officer
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Michael Kodama, Eco-Rapid Transit
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CITY OF CERRITOS

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Cerritos All-America City 2008

OFFICE OF THE CITY MANAGER
ART GALLUCCI

July 17, 2018

LA County Metropolitan Transportation Authority
Attention: Ms. Teresa Wong
Project Manager
One Gateway Plaza
Mail Stop: 99-22-4
Los Angeles, CA 90012-2952

Subject: **UPDATED PUBLIC SCOPING COMMENT PERIOD (JULY 11, 2018 – AUGUST 24, 2018) – CITY OF CERRITOS COMMENTS REGARDING THE LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY'S (METRO) PROPOSED WEST SANTA ANA BRANCH (WSAB) TRANSIT CORRIDOR PROJECT – SOUTHERN ALIGNMENT**

Dear Ms. Wong:

On behalf of the City of Cerritos, I would like to thank Metro for hosting a public outreach workshop at the Cerritos Center for the Performing Arts on Tuesday, July 10, 2018. The City of Cerritos appreciates Metro extending its public outreach efforts to the Cerritos City Council and the Cerritos community related to Metro's proposed West Santa Ana Branch (WSAB) transit light rail corridor project over the past month. The City of Cerritos is hopeful that Metro staff will incorporate comments and recommendations provided to Metro by the Cerritos City Council and the Cerritos community into Metro's environmental assessment and TOD strategic plan studies, with participation by affected communities. At the July 10, 2018 public outreach workshop, the City was made aware of an updated public scoping comment period beginning on July 11, 2018 and ending on August 24, 2018. In light of the updated public comment period, and in response to comments received from Cerritos residents and constituents at the public outreach workshop, the City of Cerritos acting as a community stakeholder and in the best interest of Cerritos residents, would like to hereby provide Metro with its recommendations and direction related to the proposed WSAB transit corridor project, and would like to request that such comments be including in Metro's preparation of an environmental analysis in conformance with California Environmental Quality Act (CEQA) requirements, and the preparation of a transit-oriented development strategic implementation plan for cities along the proposed corridor.

Metro-Proposed Station Locations

As identified in initial documents supporting the environmental analysis and the TOD strategic implementation plan, as well as in presentation and meeting materials, Metro originally proposed two (2) station locations in the City of Cerritos. The first, located within the right-of way and on adjacent commercial properties at the northwest corner of Gridley Road and 183rd Street ("Proposed Cerritos Station 1"). The second, proposed by Metro as an optional southernmost terminus, located within the right of way and on adjacent commercial property at the northeast corner of Bloomfield Avenue and Del Amo Boulevard

("Proposed Optional Cerritos Station 2"). In addition, in response to City Council direction provided to Metro at the June 14, 2018 City Council meeting, Metro has now begun its assessment of an alternative station location, generally located along the right-of-way at Studebaker Road, south of Artesia Boulevard ("Proposed Alternative Cerritos Station 3").

Please note that the City of Cerritos does not currently support a station location in Cerritos due to the close proximity of a Metro-proposed station location in the City of Artesia, and in light of the fact that the Proposed Cerritos Station 1 and Proposed Optional Cerritos Station 2 currently consist of regional commercial properties that contribute to the City's economic development efforts in the City of Cerritos, including sales tax generation, decreasing the City's unemployment rate, and providing various consumer shopping opportunities. While the City does not currently support a station location anywhere in Cerritos, the Proposed Alternative Cerritos Station 3 possesses the greatest potential for re-use and economic development opportunities and as a result should be assessed in Metro's environmental, station location, and TOD implementation plan studies, due to its proximity to the 605 Freeway, and in light of the fact that the area is primarily comprised of industrial or commercial uses, and is buffered from residential land uses.

Lastly, if the proposed WSAB transit corridor project proposes to locate a station location in the City of Cerritos, the City of Cerritos hereby requests that such stations be identified as secondary station types, with less frequent stops and intervals than others along the entire corridor.

Metro-Proposed At-Grade Light Rail Technology

Utilization of at-grade light rail technology along the WSAB transit corridor, as identified as the method in Metro's environmental and TOD implementation plan documents, as well as in presentation and meeting materials, may generate significant impacts to residential land uses directly adjacent to the right-of-way, by way of increased noise and vibration associated with the operation of this technology. Further, the technology would not be grade separated, thereby creating approximately eight (8) grade crossings along the route within Cerritos. These grade crossings would create traffic impacts resulting in potential safety hazards for pedestrians and motorists in the area and the potential for a decline in consumer spending due to accessibility constraints to the City's major commercial shopping centers adjacent to the proposed light rail line.

It is for these reasons that the City of Cerritos currently does not support an at-grade light rail line along the corridor, due to the potential noise, traffic, and environmental impacts to residential uses and the Cerritos community. Accordingly, the City would only entertain the potential use of the right-of-way for a below-grade transit line, given that a below-grade transit line would significantly reduce any of the aforementioned impacts in the City of Cerritos and its residents.

Metro-Proposed Locations for Parking Facilities/Structures

Parking structures or parking facilities to support Metro-proposed stations, as identified in initial documents supporting the environmental analysis and the TOD strategic implementation plan, proposed on privately-owned land in the City of Cerritos, thereby displacing existing Cerritos sales tax generating commercial properties, is not supported by the City of Cerritos. Specifically, parking structures or parking facilities to support the rail line at the Los Cerritos Center, Plaza 183 shopping center, or other commercial properties to support the proposed stations in Cerritos, should not be proposed without the prior

consent of, or outreach to, the respective Cerritos property owners. It should also be noted that the environmental analysis should address potential economic impacts associated with displacing existing commercial or office uses. **In addition, any proposal for a station in the City of Artesia, shall include the supporting parking structures or parking facilities located wholly within the jurisdictional boundaries of the City of Artesia, rather than locating said parking facilities to support the Artesia station within the City of Cerritos as currently proposed.**

Metro's Environmental Analysis – Del Amo Boulevard Realignment Project

As Metro is aware, on June 14, 2018 the City Council recommended that Metro expand its environmental analysis to include the re-alignment of Del Amo Boulevard at the County line, inclusive of the Del Amo Bridge. In anticipation of the WSAB connection into the County of Orange, linking the cities of Cerritos, Lakewood, La Palma and Cypress, it is imperative that the Del Amo Boulevard Bridge over Coyote Creek be replaced due to pedestrian and vehicular access concerns, and safety concerns with the curvilinear alignment of this area that transects the Metro-owned right-of-way. In order to re-align this area of the City, an environmental assessment of this realignment project will be required to be completed, and given that the right-of-way directly intersects this project area, the City of Cerritos hereby requests that Metro include the assessment in its environmental analysis for the proposed line. Information related to the Del Amo Boulevard realignment project has already been provided to Metro, by way of separate correspondence, for incorporation in the WSAB transit corridor project's environmental assessment study.

Again, thank you for hosting a public outreach workshop in the City of Cerritos and for providing information to the community related to the proposed WSAB transit corridor project, with emphasis on the southern alignment. City staff is hopeful that the position of the City relative to the proposed at-grade light rail line will be accurately reflected and incorporated in the environmental assessment and in the TOD strategic implementation plan relative to the overall design and use of the right-of-way corridor.

Should you have any questions regarding the City's comments and/or information contained herein please feel free to contact Advance Planning Manager Kristin Aguila at (562) 916-1201 or by email at kaguila@cerritos.us.

Sincerely,

Art Gallucci

Art Gallucci
City Manager

cc Cerritos City Council
Los Angeles County Supervisor Janice Hahn
Lynda Johnson, Field Deputy, Supervisor Hahn Bellflower Field Office
Torrey N. Contreras, Director of Community Development
Kanna Vancheswaren, Director of Public Works
Kristin Aguila, Advance Planning Manager
Manjeet Ranu, Metro Senior Executive Officer
Monica Born, Metro Deputy Executive Officer
Laura Cornejo, Metro Deputy Executive Officer

cc: Julia Brown, Metro Community Relations Manager
Terri Slimmer, Metro Senior Manager
Michael Kodama, Eco-Rapid Transit
Edgar Gutierrez, Arellano Associates

CITY OF CERRITOS SM

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Cerritos All-America City 2008

October 10, 2018

LA County Metropolitan Transportation Authority
Attention: Julia Brown, MPA
Community Relations Manager
Gateway Cities Region
One Gateway Plaza
Mail Stop: 99-22-1
Los Angeles, CA 90012-2952

Subject: **CITY OF CERRITOS COMMENTS IN RESPONSE TO THE PRESENTATION PROVIDED AT THE METRO-HOSTED PLANNING DIRECTOR'S MEETING HELD ON OCTOBER 2, 2018**

Dear Ms. Brown:

On October 2, 2018, City of Cerritos staff attended a Metro-hosted West Santa Ana Branch (WSAB) Transit Corridor Technical Advisory Committee (TAC) meeting, held to discuss Metro's Transit Oriented Development (TOD) Strategic Implementation Plan (SIP) document that is being prepared by Metro for cities along the WSAB transit corridor project. At the TAC meeting, a presentation was provided by Metro, and its associated consultants, conveying preliminary information related to the preparation of the TOD SIP, as well as specific information prepared for each respective jurisdiction along the WSAB transit corridor. Upon completion of Metro's presentation, cities were encouraged to submit comments to Metro for incorporation into the final document.

Accordingly, the following has been drafted in order to further clarify the City of Cerritos' position relative to the proposed Vision Statement and the City's concern about the use of the term "compact" to describe densities within station areas. In an attempt to address the City's concerns, a revised Vision Statement for the WSAB Corridor project has been developed for consideration that better reflects the desire of the WSAB Corridor cities to promote regional connectivity, potential reuse of existing land uses for economic development purposes and preservation of local control over land use decisions and related development standards such as density, parking, etc.

Further, the City of Cerritos has provided revisions to the information conveyed about the potential Cerritos station area including a disclaimer stating that the information contained in the document is for study purposes only and has not been approved by the City for implementation. The City of Cerritos recommends that a disclaimer be included when discussing potential station areas to inform residents that an official decision about whether or not to permit a station in the City has not been made. The disclaimer would also serve to allay any potential concerns about the lack of transparency and help to avoid any potential confusion among members of the development community. In accordance with

existing City policy, statements have been included to clearly reflect the City's opposition to at-grade light rail and aversion to the establishment of a Cerritos station. Lastly, the City requests that the 2013 SCAG TOD Demonstration project be referenced (by way of a link) as an alternative station area site for discussion purposes and for the benefit of future decision makers.

Revised Vision Statement (see page 11 – October 2, 2018 WSAB Corridor Presentation)

One Corridor • Distinct Communities • Unlimited Opportunities

The West Santa Ana Branch (WSAB) Transit Corridor connects distinct Southern California neighborhoods that share a desire to provide safe, accessible and walkable modern-day communities through the facilitation of responsible development around community-supported station areas that provide a mix of uses unique to each community while promoting sustainable and equitable development for stimulating new economic development opportunities in Corridor cities for the benefit of future generations.

Disclaimer (see page 13 – October 2, 2018 WSAB Corridor Presentation)

The Cerritos station area alternatives referenced herein are conceptual in nature and have been developed for the purpose of identifying possible station area locations and to illustrate the potential for new economic development opportunities for cities located along the WSAB Corridor ("Corridor"). This information has been developed for study purposes only and has not been approved for use and implementation by the City of Cerritos.

The City of Cerritos is strongly opposed to the deployment of at-grade light-rail and is in favor of a below-grade alternative for use in the Cerritos Corridor segment. Further, the City of Cerritos does not support a station due to the close proximity of the City of Artesia terminus station, which is planned to be located one mile east of the proposed Cerritos station area. It is believed that a Cerritos station would contribute to an over concentration of station areas along the Corridor resulting in increased headways and a reduction in overall system efficiency. Therefore, the City of Cerritos recommends that transit users be provided with first and last mile transportation alternatives gained from the Artesia terminus station in order to access jobs and shopping opportunities in Cerritos. Accordingly, any future development to be located within the Cerritos study area referenced herein shall be in compliance with the goals and objectives of the Cerritos General Plan and shall satisfy all applicable development standards set forth by the Cerritos Municipal Code.

Cerritos General Plan:
http://www.cerritos.us/GOVERNMENT/_pdfs/general_plan_000_complete.pdf

Cerritos Municipal Code: https://www.codepublishing.com/CA/Cerritos/

City of Cerritos Station Area Alternatives (see page 13 – October 2, 2018 WSAB Corridor Presentation)

Gridley Road/ 183rd Street and Studebaker Road/ WSAB Corridor Station Areas:

- Support the deployment of underground light-rail within the jurisdictional boundaries of the City of Cerritos

- Establish passive recreation opportunities within the WSAB Corridor
- Potential station area location alternatives for study purposes:
  - **Alternative 1** - Southeast of Studebaker Road and the WSAB Corridor within the existing industrial property zoned Industrial/ Commercial (MC). Please reference the 2013 Southern California Association of Governments (SCAG) – City of Cerritos: Transit Oriented Development (TOD) Demonstration Project - Conceptual Master Plan at http://sustain.scag.ca.gov/Documents/Cerritos_Station_TOD_District_Final_Report_web.pdf.
  - **Alternative 2** - Northwest corner of Gridley Road and 183rd Street within the existing commercial shopping center zoned Regional Commercial (CR)
- Solicit stakeholder input from commercial, industrial, office and residential property owners located within the general vicinity of the station area
- Promote pedestrian circulation and connectivity by creating large pedestrian oriented greenbelts along 183rd Street
- Promote linkages by designing a pedestrian bridge that would provide safe and unobstructed pedestrian access between commercial developments that are physically separated by 183rd Street

In addition to the comments contained herein, a copy of Metro's October 2, 2018 powerpoint presentation has been attached hereto, inclusive of the City of Cerritos mark-ups and suggested revisions, further clarifying the City of Cerritos' position and recommendations for the final WSAB TOD SIP document. The City of Cerritos appreciates the opportunity to submit its comments for incorporation into the final document. Should you have any questions, please contact Mrs. Aguila at (562) 916-1201 or by email at kaguila@cerritos.us.

Sincerely,

Torrey N. Contreras
Director of Community Development

Attachment

cc Cerritos City Council
Art Gallucci, City Manager
Lynda Johnson, Field Deputy, Supervisor Hahn Bellflower Field Office
Kristin Aguila, Advance Planning Manager
Monica Born, Metro Deputy Executive Officer
Laura Cornejo, Metro Deputy Executive Officer
Julia Brown, Metro Community Relations Manager
Melani Smith, Metro
Matt Abott, Metro
Michael Kodama, Eco-Rapid Transit
Edgar Gutierrez, Arellano Associates

CITY OF CERRITOS

CIVIC CENTER · 18125 BLOOMFIELD AVENUE
P.O. BOX 3130 · CERRITOS, CALIFORNIA 90703-3130
PHONE: (562) 916-1301 · FAX: (562) 468-1095
WWW.CERRITOS.US

Cerritos All-America City 2008

OFFICE OF THE CITY MANAGER
ART GALLUCCI

November 7, 2018

LA County Metropolitan Transportation Authority
Attention: Julia Brown, MPA
Community Relations Manager
Gateway Cities Region
One Gateway Plaza
Mail Stop: 99-22-1
Los Angeles, CA 90012-2952

Subject: **CITY OF CERRITOS COMMENTS IN RESPONSE TO THE OCTOBER 10, 2018 CITY/METRO MEETING HELD TO DISCUSS THE WEST SANTA ANA BRANCH (WSAB) TRANSIT CORRIDOR PROJECT**

Dear Ms. Brown:

On Wednesday, October 10, 2018, City staff, at the request of Metro, met with Metro representatives to discuss the West Santa Ana Branch (WSAB) transit corridor project in order to obtain a status report on the conceptual plan for the potential Cerritos station area and the environmental impact report (EIR) being prepared in support of the project. The meeting served to follow-up on previous verbal and written communications by the City of Cerritos related to the Metro-proposed WSAB project scope, and to obtain an update on Metro's status in preparing the environmental and transit oriented development studies being prepared to support the WSAB project.

As you are aware, in previous verbal and written communications, the City of Cerritos expressed its opposition to an at-grade light rail, the Metro-proposed Cerritos terminus station located at Bloomfield Avenue and Del Amo Boulevard, parking structures located in the City of Cerritos for the Artesia Station, and parking structures located within the existing Los Cerritos Center parking lot to support Metro's proposed station at 183rd Street and Gridley Road. In addition, the City of Cerritos previously informed Metro of the community's general lack of support for the WSAB corridor project due to the proposed use of at-grade light rail technology and the community's current aversion to density and intensification of existing land uses around station areas that is being championed by the Metro-proposed WSAB project. Additionally, the City of Cerritos previously expressed its opposition to displacing existing sales tax revenue generating commercial uses that would be necessary to accommodate a Cerritos station and supporting parking structures.

In light of the aforementioned concerns previously expressed to Metro by the City of Cerritos and the Cerritos community, during the October 10, 2018 meeting City staff was informed that Metro revised its project scope to eliminate the consideration of a potential Cerritos station area from the WSAB project due to the City's opposition to such a station. Additionally, Metro indicated that they would support an above-grade rail segment at the

Gridley Road and 183rd Street intersection, in an attempt to address the City's concerns about an at-grade diagonal arterial street crossing at this intersection.

In response to Metro's revised WSAB project scope, including the removal of all proposed station locations in the City of Cerritos, the City provided the following recommendations and comments to Metro at the October 10, 2018 City/Metro meeting. The following comments and recommendations are again being provided to Metro, for clarification purposes.

Station Locations in the City of Cerritos

In light of the long-term implications of eliminating any consideration of a potential Cerritos station from the WSAB project and the related EIR, the City of Cerritos hereby requests that Metro move forward with the completion of the WSAB project and related EIR with the inclusion of the potential optional Cerritos stations for study and future consideration purposes. Potential station locations include the existing commercially zoned private property located at the northwest corner of 183rd Street and Gridley Road (Station Area I), or the fully developed, industrially zoned private property located along the east side of Studebaker Road and south of Artesia Boulevard (Station Area II). Including the optional Cerritos station location areas in the WSAB project scope, and related EIR, allows the City of Cerritos to reserve the right for future residents and City decision makers to determine if, and/or when, a station should be developed in Cerritos.

At-Grade Light Rail Technology

While the revised WSAB project scope includes an above-grade rail segment at the Gridley Road and 183rd Street intersection in the City of Cerritos, with all other grade crossings proposed to be at-grade, the City of Cerritos requests that Metro establish below-grade light rail as the only alternative supported by the City of Cerritos and advises that the below-grade configuration be assessed in the WSAB project and related EIR. Utilization of at-grade light rail technology along the WSAB transit corridor may generate significant noise, traffic, and environmental impacts to residential uses and the Cerritos community. Given that a below-grade transit line would significantly reduce any of the aforementioned impacts in the City of Cerritos, it is recommended that the below-grade configuration be included in Metro's environmental assessment for the Cerritos portion of the WSAB project.

The City of Cerritos appreciates the opportunity to meet with Metro staff to continue discussions related to the WSAB project and would like to thank Metro in advance for its consideration and incorporation of the City of Cerritos' recommendations and requests conveyed herein, as well as at the October 10, 2018 City/Metro meeting, in developing the WSAB project scope and in its environmental assessment for the WSAB project.

Should you have any questions regarding the City's comments and/or information contained herein please feel free to contact Advance Planning Manager Kristin Aguila at (562) 916-1201 or by email at kaguila@cerritos.us.

Sincerely,

Art Gallucci
CITY MANAGER

cc Cerritos City Council
Lynda Johnson, Field Deputy, Supervisor Hahn Bellflower Field Office
Torrey N. Contreras, Director of Community Development
Kristin Aguila, Advance Planning Manager
Monica Born, Metro Deputy Executive Officer
Laura Cornejo, Metro Deputy Executive Officer
Manjeet Ranu, Metro Senior Executive Officer
Melani Smith, Metro
Matt Abott, Metro
Michael Kodama, Eco-Rapid Transit
Edgar Gutierrez, Arellano Associates

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Cerritos All-America City 2008

OFFICE OF THE CITY MANAGER
ART GALLUCCI

February 11, 2019

LA County Metropolitan Transportation Authority
Attention: Manjeet Ranu
Metro Senior Executive Officer
Gateway Cities Region
One Gateway Plaza
Mail Stop: 99-22-1
Los Angeles, CA 90012-2952

SUBJECT: CITY OF CERRITOS COMMENTS PERTAINING TO INFORMATION CONVEYED BY METRO DURING THE FEBRUARY 7, 2019 COMMUNITY UPDATE MEETING HELD AT THE CITY OF ARTESIA REGARDING THE WEST SANTA ANA BRANCH (WSAB) TRANSIT CORRIDOR PROJECT

Dear Mr. Ranu:

On Thursday February 7, 2019, City of Cerritos staff attended Metro's Community Update Meeting held in the City of Artesia to obtain information about recent updates to the West Santa Ana Branch (WSAB) Transit Corridor Project in response to previously received public comments. According to the information presented by Metro staff, it is the City's understanding that the following changes have been incorporated into the most recent version of the WSAB transit corridor project in direct response to previous comments and concerns expressed by the City of Cerritos:

- Metro-proposed transit stations to be located in the City of Cerritos have been eliminated from consideration and are no longer part of the WSAB project; and,

- Metro-proposed diagonal at-grade street crossing located at the intersection of Gridley Road and 183rd Street has been changed to a diagonal above-grade street crossing, measuring approximately thirty five (35) feet in height as measured from the adjacent finished street grade, in an effort to mitigate traffic impacts resulting from said at-grade street crossing.

The City of Cerritos appreciates the referenced changes introduced by Metro to the originally proposed WSAB corridor project definition; however, said modifications fall short of adequately allaying the concerns of the City and its residents. Accordingly, the City of Cerritos would like to submit additional comments in order to further clarify the City's explicit opposition to both at-grade and above-grade rail configurations. The City also would like to restate its aversion to the potential use of property located in the City of Cerritos for supporting the Artesia Terminus Station and/or the WSAB corridor project.

The following comments are being remitted to Metro for use in preparing the Draft Environmental Impact Report (EIR) in support of the WSAB corridor project and to expressly account for the use and deployment of the below-grade alternative within the jurisdictional boundaries of the City of Cerritos.

- Cerritos maintains its explicit opposition to both at-grade and above-grade light-rail configurations that are currently proposed by Metro for deployment in the WSAB corridor project segment located within the jurisdictional boundaries of the City. The City of Cerritos remains steadfast and resolute in its support for the use of the below-grade light rail alternative for use in Cerritos to effectively mitigate the unavoidable pedestrian, safety, traffic, noise and privacy impacts generated by both at-grade and above-grade configurations.

- Cerritos maintains its explicit opposition to locating parking structures and/or any associated infrastructure improvements or equipment in the jurisdictional boundaries of the City of Cerritos in support of either the Artesia Terminus Station or the WSAB corridor project.

  Note: It is recommended that the underutilized commercial property located in the City of Artesia, south of Artesia Park along South Street and east of the former Southern Pacific Railway, be used to accommodate additional parking for the Artesia Terminus Station in lieu of displacing potential revenue generating uses on Pioneer Boulevard. Additionally, pedestrian improvements such as a decorative pedestrian bridge serving as a gateway to the Artesia Terminus Station area on South Street and connecting the subject property (proposed parking structure location) to Artesia Park and the adjacent corridor should be considered for improved accessibility.

While the revised WSAB project scope includes an above-grade rail segment at the Gridley Road and 183rd Street, an at-grade diagonal street crossing remains proposed on Studebaker Road (south of Artesia Boulevard) causing unavoidable pedestrian, safety and traffic impacts at that location, which has been slated for the expansion of the Cerritos Auto Square and potential mixed-use development. Therefore, the City of Cerritos requests that Metro establish below-grade light rail as the only alternative supported by the City of Cerritos and advises that the below-grade configuration be assessed as a viable alternative in the WSAB project EIR.

The City of Cerritos appreciates the opportunity to continue discussions related to the WSAB project and would like to thank Metro in advance for its consideration and incorporation of the City of Cerritos' recommendations conveyed herein. Should you have any questions regarding the City's comments and/or information contained herein please feel free to contact Director of Community Development Torrey N. Contreras at (562) 916-1201 or by email at tcontreras@cerritos.us.

Sincerely,

Art Gallucci
CITY MANAGER

cc Cerritos City Council

cc (continued)
Lynda Johnson, Field Deputy, Supervisor Hahn Bellflower Field Office
Monica Born, Metro Deputy Executive Officer
Laura Cornejo, Metro Deputy Executive Officer
Meghna Khanna, Metro WSAB Corridor Project Manager
Julia Brown, Metro Community Relations Manager
Melani Smith, Metro
Torrey N. Contreras, Director of Community Development
Kristin Aguila, Advance Planning Manager
Matt Abott, Metro
Michael Kodama, Eco-Rapid Transit
Edgar Gutierrez, Arellano Associates

Sabrina Chan - City of Cerritos - WSAB Project: Section 4(f) Consultation

From:	Kristin Aguila
To:	Eric Chau; Meghna Khanna
Date:	2/10/2020 4:12 PM
Subject:	City of Cerritos - WSAB Project: Section 4(f) Consultation
Cc:	Torrey Contreras; Art Gallucci
Bc:	Sabrina Chan
Attachments:	Cerritos Section 4(f).pdf

Dear Mr. Chau and Ms. Khanna,

Thank you for your letter and email dated January 29, 2020 requesting information related to potential resources in the City of Cerritos subject to Section 4(f) of the Department of Transportation Act of 1966. In accordance with the correspondence, as part of Metro's preparation of a draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the West Santa Ana Branch (WSAB) Transit Corridor Project, Metro is seeking the assistance of local municipalities to identify land protection under Section 4(f). Pursuant to Metro's correspondence, Metro has identified Rosewood Park, located at 17715 Eric Avenue, Cerritos, CA 90703, as a Section 4(f) resource within the City of Cerritos ("subject property"). This email serves as follow up to Metro's request for information related to the subject property, and to provide additional input related to Metro's preparation of its EIS/EIR for the WSAB transit corridor project.

It should be noted that the subject property is not owned by the City of Cerritos, and therefore Metro's request for information related to the subject property should be handled directly by the property owner, the Artesia Cemetery District.

On March 5, 1986, the City of Cerritos entered into a lease agreement with the property owner, the Artesia Cemetery District ("District"), to lease a portion of the District's unused property for the benefit of developing a community park for local residents. Under this agreement, two parcels were designated for recreational use with the northern parcel designed to accommodate expansion needs of the adjacent cemetery, and the southern parcel designed as a community park maintained by the City of Cerritos. On March 6, 2011, the City of Cerritos and the Artesia Cemetery District renewed the lease agreement, allowing for an annual renewal provision for a maximum of fifty years. More information related to the lease agreement of the District's intent and use of all parcels can be directed to the property owner accordingly.

In regards to the WSAB line that traverses through the City of Cerritos, the City of Cerritos continues to maintains its explicit opposition to both at-grade and above-grade light-rail configurations that are currently proposed by Metro for deployment in the WSAB corridor project segment located within the jurisdictional boundaries of the City. The City of Cerritos remains steadfast and resolute in its support for the use of the below-grade light rail alternative for use in Cerritos to effectively mitigate the unavoidable pedestrian, safety, traffic, noise and privacy impacts generated by both at-grade and above-grade configurations. As such, the City of Cerritos strongly advises that the below-grade configuration be assessed as a viable alternative in the WSAB project EIR.

If you could please confirm receipt of this email and the information contained herein, it would be appreciated. Should you have any additional questions, please do not hesitate to contact me at (562) 916-1201.

Thank you,
Kristin Aguila
Advance Planning Manager
City of Cerritos

Dear Mr. Gallucci,

The Los Angeles County Metropolitan Transportation Authority (LACMTA), in coordination with the Federal Transit Administration (FTA), is preparing a Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the West Santa Ana Branch (WSAB) Transit Corridor Project. The purpose of this letter is to conduct consultation with agencies of jurisdiction per Section 4(f).

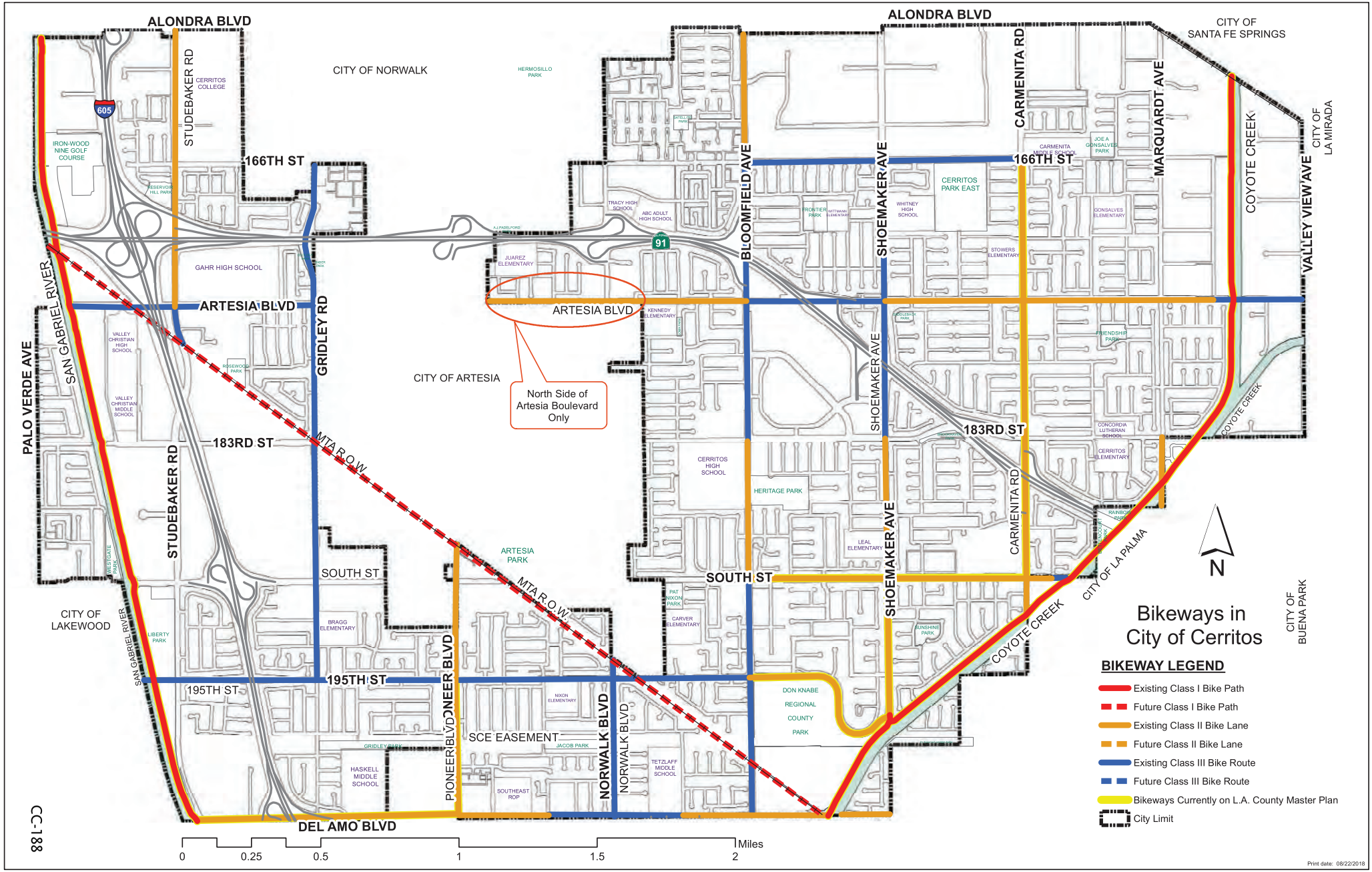
At this time, LACMTA requires the information to identify Section 4(f) resources for analysis of the WSAB Transit Corridor Project. Also, please include any comments or concerns related to the WSAB Transit Corridor Project potential effects to the park.

We will appreciate your input by February 12, 2020. Let us know if you have any questions about this information request.

Thank you,

Eric Chau
LA Metro
Transportation Associate
Countywide Planning & Development
213.922.2311
metro.net | facebook.com/losangelesmetro | @metrolosangeles
Metro's mission is to provide world-class transportation for all.

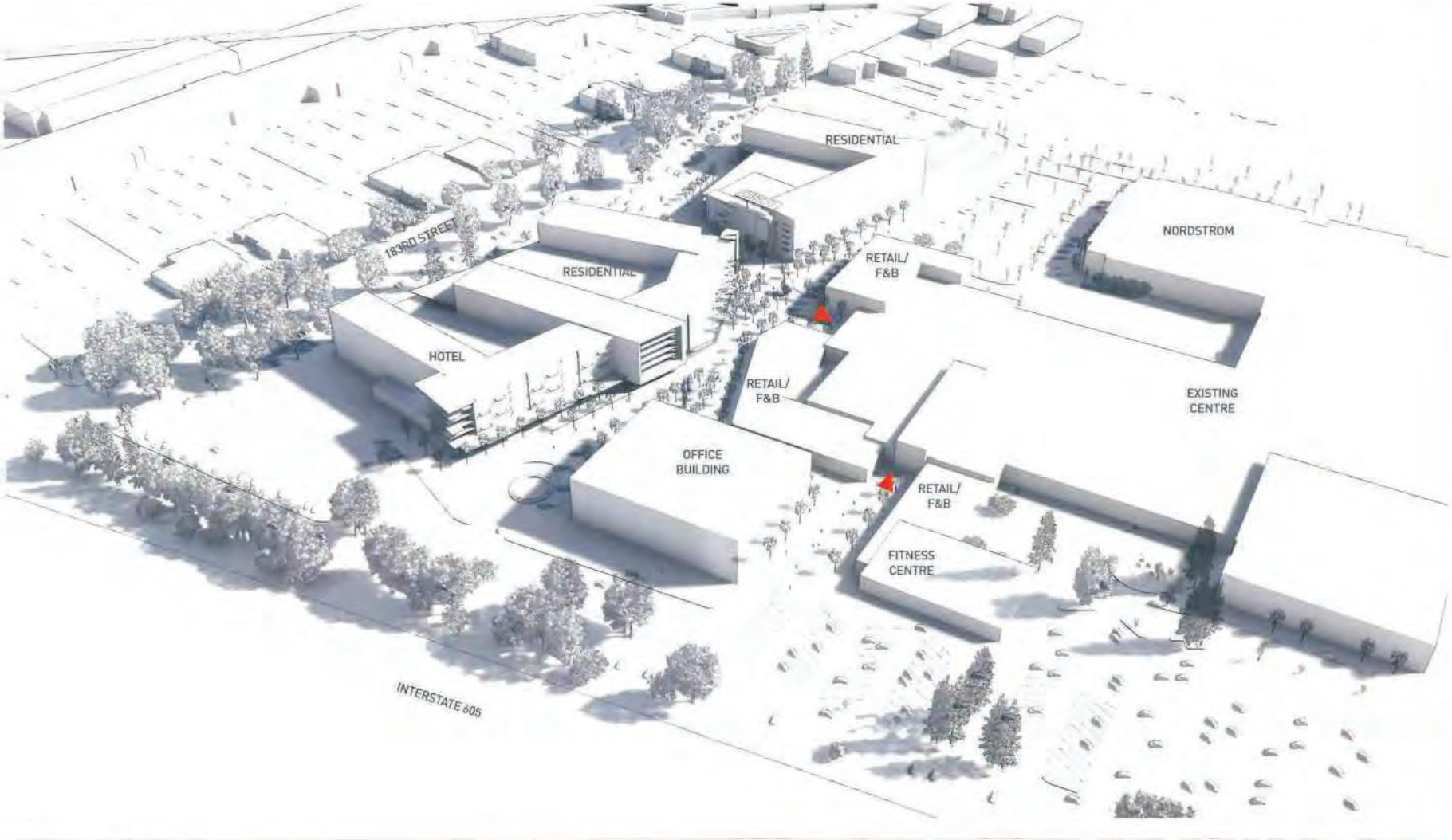
ATTACHMENT 3


ALONDRA BLVD
ALONDRA BLVD
CITY OF SANTA FE SPRINGS
CITY OF NORWALK
HERMOSILLO PARK
STUDEBAKER RD
CERRITOS COLLEGE
605
IRON-WOOD NINE GOLF COURSE
RESERVOIR HILL PARK
166TH ST
166TH ST
GAHR HIGH SCHOOL
TRACY HIGH SCHOOL
ABC ADULT HIGH SCHOOL
L.J. PARELFORD
JUAREZ ELEMENTARY
91
BLOOMFIELD AVE
SHOEMAKER AVE
CARMENITA RD
CERRITOS PARK EAST
FRONTIER PARK
WITTMAN ELEMENTARY
WHITNEY HIGH SCHOOL
STOWERS ELEMENTARY
CARMENITA MIDDLE SCHOOL
JOE A GONSALVES PARK
GONSALVES ELEMENTARY
MARQUARDT AVE
COYOTE CREEK
VALLEY VIEW AVE
CITY OF LA MIRADA
PALO VERDE AVE
SAN GABRIEL RIVER
ARTESIA BLVD
ARTESIA BLVD
KENNEDY ELEMENTARY
GRIDLEY RD
VALLEY CHRISTIAN HIGH SCHOOL
ROSEWOOD PARK
CITY OF ARTESIA
North Side of Artesia Boulevard Only
FRIENDSHIP PARK
VALLEY CHRISTIAN MIDDLE SCHOOL
183RD ST
MTA R.O.W.
CONCORDIA LUTHERAN SCHOOL
CERRITOS ELEMENTARY
CERRITOS HIGH SCHOOL
HERITAGE PARK
CARMENITA RD
RAINBOW PARK
WESTGATE PARK
ARTESIA PARK
SOUTH ST
SOUTH ST
LEAL ELEMENTARY
PAT NIXON PARK
CARVER ELEMENTARY
CITY OF LA PALMA
CITY OF LAKEWOOD
SAN GABRIEL RIVER
LIBERTY PARK
BRAGG ELEMENTARY
SUNSHINE PARK
COYOTE CREEK
CITY OF BUENA PARK
195TH ST
195TH ST
PIONEER BLVD
NIXON ELEMENTARY
DON KNABE REGIONAL COUNTY PARK
SCE EASEMENT
GRIDLEY PARK
JACOB PARK
NORWALK BLVD
NORWALK BLVD
HASKELL MIDDLE SCHOOL
TETZLAFF MIDDLE SCHOOL
SOUTHEAST ROP
DEL AMO BLVD
N
Bikeways in City of Cerritos
BIKEWAY LEGEND
Existing Class I Bike Path
Future Class I Bike Path
Existing Class II Bike Lane
Future Class II Bike Lane
Existing Class III Bike Route
Future Class III Bike Route
Bikeways Currently on L.A. County Master Plan
City Limit
0
0.25
0.5
1
1.5
2
Miles
Print date: 08/22/2018

ATTACHMENT 4

Los Cerritos Center

OPTION C - VIEW 1



LOS CERRITOS CENTER, CALIFORNIA

Los Cerritos Center

AERIAL VIEW

COLANTUONO
HIGHSMITH
WHATLEY, PC

MICHAEL G. COLANTUONO | (530) 432-7359 | MCOLANTUONO@CHWLAW.US

Our File No. 11328.0002

September 28, 2021

VIA E-MAIL AND FEDEX

Ms. Meghna Khanna
Project Manager
Metro
One Gateway Plaza, Mailstop: 99-22-7
Los Angeles, Ca 90012
khannam@metro.net; wsab@metro.net

Re: **Comments to Draft Environmental Impact Statement / Environmental Impact Report for West Santa Ana Branch Transit Corridor**

Dear Ms. Khanna:

We write on behalf of the City of Cerritos to comment on the Draft Environmental Impact Statement / Environmental Impact Report ("DEIR") for the West Santa Ana Branch Transit Corridor project ("WSAB"). CC-8-121

As you know, the purpose of an EIR "is to inform the public and its officials of the environmental consequences of their decisions before they are made." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564, abridgement omitted.) This DEIR provides too little information about critical aspects of WSAB to do so. CC-8-122

To remedy the deficiencies identified described below, Los Angeles County Metropolitan Transportation ("Metro" or "MTA") must undertake additional analysis to identify means to mitigate WSAB's significant impacts on the environment and then circulate a revised DEIR.

I. DEIR'S COMMENT PERIOD WAS TOO SHORT GIVEN ITS LENGTH AND COMPLEXITY

Public Resources Code section 21091, subdivision (a) provides that "[t]he public review period for a draft environmental impact report shall not be less than 30 days." (*Ibid*.) This is a floor. Complicated projects require longer comment periods to allow meaningful public participation. While we appreciate the 15-day extension Metro granted, that is not enough. The DEIR is roughly 1,360 pages and has fully 45 appendices — of roughly 23,500 pages. CC-8-123

We request that Metro extend the comment period for an additional 45 days from September 28, 2021 to November 12, 2021 so that interested parties and other stakeholders have adequate time to review and comment.

II. THE DEIR FAILS TO PROPERLY EVALUATE PROJECT ALTERNATIVES

The DEIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." (CEQA Guidelines, § 15126.6).

The WSAB crosses a major intersection of the City — and indeed, this entire region of Southern Los Angeles County — at a diagonal and with peak-period headways of every few minutes. This creates significant impacts on traffic flow and circulation and will have adverse impacts on Los Cerritos Center, Plaza 183 Shopping Plaza, and Cerritos Auto Square — each a regionally significant retail center and a significant source of sales taxes to Cerritos, Los Angeles County, its transportation agencies (including Metro) and the State. The DEIR proposes to mitigate these impacts by elevating the line through this intersection, dividing the City with a massive concrete wall and placing a significant noise emitter at an elevation adjacent to many homes in Cerritos and Artesia. This is such an ill-founded idea that one wonders if it is a ploy to make an at-grade crossing more palatable. This cure is worse than the disease it addresses, needlessly so. CC-8-124

There are feasible alternatives which the DEIR ignores. At a minimum, these include undergrounding and/or trenching the line through the City or ending the line in Bellflower. Eco-Rapid Transit and the City believe that trenching would be a more cost effective alternative to tunneling and the proposed bridge flyover. These options receive scant attention in the DEIR despite the City's request that they be included. The City's CC-8-125

request for underground alternatives was documented in seven (7) letters to Metro staff members, which are attached to the City's DEIR comment letter and summarized below:

- Letter to Mr. Manjeet Ranu dated April 20, 2018: "…the City of Cerritos currently does not support an at-grade light rail line along the corridor…. Nevertheless, the City would entertain… a below-grade transit line…."

- Letter to Mr. Manjeet Ranu dated June 22, 2018: "…the City's opposition to an at-grade light rail traversing through its boundaries…"

- Letter to Ms. Teresa Wong dated July 17, 2018: "…the City of Cerritos currently does not support an at-grade light rail line along the corridor…. Accordingly, the City would only entertain… a below-grade transit line…."

- Letter to Ms. Julia Brown dated October 10, 2018: "The City of Cerritos is strongly opposed to the deployment of at-grade light rail and is in favor of a below-grade alternative for use in the Cerritos corridor segment."

- Letter to Ms. Julia Brown dated November 7, 2018: "…the City of Cerritos requests that Metro establish below-grade light rail as the only alternative supported by the City of Cerritos and advises that the below-grade configuration be assessed in the WSAB project and related EIR."

- Letter to Mr. Manjeet Ranu dated February 11, 2019: "Cerritos maintains its explicit opposition to both at-grade and above-grade light rail configurations that are currently proposed by Metro… within the jurisdictional boundaries of the City. The City of Cerritos remains steadfast and resolute in its support for the use of the below-grade light rail alternative for use in Cerritos to effectively mitigate the unavoidable pedestrian, safety, traffic, noise and privacy impacts generated by both at-grade and above-grade configurations. ...[T]he City of Cerritos requests that Metro establish below-grade light rail as the only alternative supported by the City of Cerritos and advises that the below-grade configuration be assessed as a viable alternative in the WSAB project EIR."

- Email to Mr. Eric Chau and Ms. Meghna Khanna dated February 10, 2020: "…[T]he City of Cerritos continues to maintain its explicit opposition to both at-

CC-8-125

> grade and above-grade light rail configurations that are currently proposed by Metro for deployment in the WSAB corridor project segment located within the jurisdictional boundaries of the City. The City of Cerritos remains steadfast and resolute in its support for the use of the below-grade light rail alternative for use in Cerritos to effectively mitigate the unavoidable pedestrian, safety, traffic, noise and privacy impacts generated by both at-grade and above-grade configurations. As such, the City of Cerritos strongly advises that the below-grade configuration be assessed as a viable alternative in the WSAB project EIR."

CC-8-125

The DEIR dedicates only four pages to underground alignments. (DEIR, § 2.4.4.2 [Underground Alignment Scenarios Not Further Considered]; see also App. P, at App. A.) The analysis provided is focused on the cost of undergrounding and that the act of tunneling has environmental impacts of its own. The DEIR does not compare the effects of this alternative to those of the project; so, we know Metro prefers to avoid undergrounding due to cost, but we are not informed as to the environmental dimensions of this choice — the very point of alternatives analysis.

CC-8-126

Scant discussion is offered as to terminating the line north of the problematic intersection in Cerritos (App. A, § 8) at a time when additional funding might be available to achieve the environmentally preferred alternative. As it is, we do not even know what that environmentally preferred alternative is due to the DEIR's shortcomings.

CC-8-127

An evaluation of future impacts is also missing. The Displacements and Acquisitions Impact Report (App. H) discusses at length the use of eminent domain and the inevitable displacements it will cause. (App. H, at §§ 6–7.) Mitigation efforts are limited to:

> Metro would provide relocation assistance and compensation for all displaced businesses and residences as required under the Uniform Act, California Relocation Act, and other applicable regulations. No mitigation measures are required.

(*Id*. at p. 8-1.) This ignores the impact of displaced residential, office, hotel, and retail commercial uses, which should be relocated within the jurisdiction of origin, when feasible. It is imperative for no (or low) property tax cities like Cerritos to retain hotel and regional commercial uses for revenue generation.

CC-8-128

It is the understanding of City staff that Metro currently has the potential to acquire $4 billion in combined local Measure M and federal New Starts funding, but is in need of an additional $6 billion to complete the entire line. Therefore, the City recommends the project be constructed in phases. For example, Phase 1 of the project could begin at the City of Bellflower and proceed northwest toward Union Station. Phase 1 would likely terminate prior to entering into the City of Los Angeles due to insufficient funding. Nevertheless, once the line has reached Union Station, work can commence on a subsequent phase from the City of Bellflower to the City of Artesia and onto Orange County. CC-8-129

The "fundamental purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment.'" (*Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 428, citing Pub. Resources Code, § 21061.) DEIR also must "present information in such a manner that the foreseeable impacts of pursuing the project can actually be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made." (*Id*. at pp. 449-450.) CC-8-130

III. THE DEIR INADEQUATELY ANALYZES MITIGATION MEASURES

The Noise and Vibration Impact Report (App. M) summarizes every municipal code and general plan provision of the affected cities, including Cerritos (App. M, § 3.4.12), the project will violate. So, the significant noise impacts are disclosed. However, the analysis is much less robust as to means to mitigate these impacts. The DEIR must describe the mitigation measures and demonstrate that they will actually mitigate impacts to the extent predicted. (*California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 203.) Members of the public must be able to trace the analytical route Metro traveled. (*Save Our Peninsula Committee v. Monterey County Bd. Of Supervisors* (2001) 87 Cal.App.4th 99, 118.) Meaningful assessment of a proposed mitigation measure requires that the potential impact be clearly identified and quantified, if possible. CC-8-131

The project entails demolition and reconstruction of a bridge over the San Gabriel River. A pressurized jet fuel line crosses the river at that point, raising obvious constraints on construction and hazards to the project and to the public. It may raise operational risks for the transit line, too. We do not know because the DEIR does not disclose this hazard, CC-8-132

identify its impacts, or propose means to mitigate them. It makes no reference to the line at all. CC-8-132

The project proposes a turn-around yard at the end of the line in Cerritos that, again will have headways of very few minutes during peak period. This site will be a bad neighbor for the residences around with aesthetic, noise, traffic (and concomitant air quality) impacts. These impacts are barely acknowledged and obvious means to mitigate them are not discussed. Among these are terminating the line elsewhere, perhaps north of Cerritos so as to avoid the problematic intersection noted above. Another would be to disperse the turn-around function, having only some trains travel the entire length of the WSAB right-of-way, to distribute the burden on these traffic-disrupting train movements. CC-8-133

The Final Travel Forecasting Report (App. II) provides estimates of the anticipated ridership per station (App. II, at p. 5-8) and daily parking demand. (App. II, at p. 5-39). For the Pioneer Station, the DEIR estimates a peak demand of roughly 4,000 riders (*id*. at p. 5-8) and a daily parking demand of 1,000 spaces. (*Id*. at p. 5-39). This is inadequate. . Additionally, the existing area is deficient in parking with plans by the City of Artesia to further intensify the downtown area. The combined parking impacts generated by commercial uses located in downtown Artesia, coupled with the parking demand of the Artesia terminus station, will produce unavoidable adverse impacts to surrounding residential, commercial and office uses located in the City of Artesia and the City of Cerritos. Therefore, it is imperative for DEIR to require additional satellite parking structures to be constructed entirely within the City of Artesia to mitigate the parking impacts generated by the WSAB terminus station. CC-8-134

IV. FURTHER COMMENTS FROM CITY

We attach further comments on behalf of the City prepared by its staff and consultants. If further elaboration on any of these points would assist Metro, please let us know. CC-8-135

We look forward to a more complete environmental analysis when Metro responds to these comments. CC-8-135

Sincerely,

Michael G. Colantuono
Special Counsel, City of Cerritos

MGC:jlj

c: Torrey Contreras, Sr. Assistant City Manager, City of Cerritos

City of Cerritos – CC-8

Comment ID	Response
CC-8-1	Response not required.
CC-8-2	Refer to CR-GEN-5 regarding implementation and recommendation of mitigation measures. Refer to CR-GEN-3 regarding the cut-and-cover study.
CC-8-3	The alignment evaluated in the Draft and Final EIS/EIR is designed not to preclude a future station near 183rd/Gridley. If, in the future, a station is proposed near 183rd/Gridley, environmental clearance for that station would be undertaken at that time.
CC-8-4	Refer to response CR-FIN-1 regarding the 3 percent match.
CC-8-5	The comment, which regards the City of Cerritos' participation, is acknowledged.
CC-8-6	See response CR-GEN-1 regarding identification of the Locally Preferred Alternative (LPA) and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo.
CC-8-7	Refer to CR-GEN-3 regarding the cut-and-cover study that was completed.

Comment ID	Response
CC-8-8	Funding for the LPA is not unlimited. To the contrary, Metro must aggressively pursue multiple avenues of funding to complete the LPA. As outlined in the WSAB Funding Plan (received by the Metro Board on December 2, 2021), to address the LPA's financial shortfall, Metro would seek approximately $3.15 billion of New Starts funding from the Federal Transit Administration (FTA). The amount of New Starts funding that Metro can request is limited by the New Starts rating system, which dictates that Metro's funding request must be less than 50 percent of the LPA's cost in order for the Project to qualify for the minimum rating needed for New Starts funding. In addition to New Starts funding, approximately $850 million in state funds would be needed to complete the LPA. Based on discussions with the FTA, the Record of Decision will be issued on the financially feasible alternative, which relies on both local and federal funding sources. It is not feasible to add additional substantial costs to the Project, including the costs of an underground alignment within the City of Cerritos. Chapter 2, Section 2.4.4 of the Draft EIS/EIR states that an underground alignment was considered and eliminated because of additional project costs and risks, making an underground alignment neither fiscally feasible nor prudent under the Measure M funding constraints. Therefore, an underground alignment was not considered further in the Draft EIS/EIR. This conclusion is confirmed by the Cut-and-Cover Study (Metro 2022), completed by Metro per the January 2022 direction of the Metro Board (Board Motion 2022-0023). The Cut-and-Cover Study evaluated a cut-and-cover (i.e., underground) alignment at six locations where the LPA is currently proposed to be aerial. For each of the six locations, conceptual cut-and-cover designs were developed and evaluated for constraints, costs, and potential effects. The study determined that major utilities and ongoing freight rail traffic constrained the design of the cut-and-cover sections. In the six locations considered along the alignment, a cut-and-cover design would increase the project cost by between $14 million and $808 million in 2022 dollars ($22 million to $1.3 billion in year of expenditure dollars) compared to the cost of an aerial alignment as described in the Draft EIS/EIR. For the location considered that would be partially within the City of Cerritos, a cut-and-cover design would increase the project cost by between $296 million and $747 million in 2022 dollars ($462 million to $1.2 billion in year of expenditure dollars) compared to the cost of an aerial alignment as described in the Draft EIS/EIR. The lower cost does not include a station at 183rd Street/Gridley Avenue, and the higher cost includes an underground station at 183rd Street/Gridley Avenue. Initial meetings were held with the City of Cerritos on April 12, 2022, to discuss the scope of the Cut-and-Cover Study and on June 10, 2022 to discuss utilities at the 183rd Street/Gridley Avenue intersection that would be affected by a cut-and-cover alignment. At the conclusion of the study, Metro staff determined that a cut-and-cover alignment is not a feasible alternative due to the substantial increase in costs. The conclusion of the Cut-and-Cover Study was discussed with the City of Cerritos on September 22, 2022, and with the WSAB City Managers' Technical Advisory Committee (TAC) on October 3, 2022. An informal report was prepared for the Metro Board on May 16, 2023 to provide the findings of the cut-and-cover analysis. Because cut-and-cover alignments were determined not to be a feasible alternative due to increased costs, the alignment is not considered in the Final EIS/EIR.
CC-8-9	See responses to comments CC-8-2 and CC-8-8.
CC-8-10	See responses to comments CC-8-2 and CC-8-8.

Comment ID	Response
CC-8-11	As discussed in Chapter 2, Sections 2.4 and Chapter 7, Section 7.5 of the Draft EIS/EIR, the alternatives screening and identification process for the Build Alternatives was based on extensive outreach and workshops with key stakeholders, elected officials, advisory committee members, and communities, including the City of Cerritos. Additional information regarding the alternatives screening and identification process is provided in Draft EIS/EIR Appendix A: Alternatives Considered and Appendix HH: Updated Scoping Report. The EIS/EIR evaluates a reasonable range of alternatives and includes stringent mitigation measures to minimize the Project's significant adverse effects and significant impacts to the maximum extent feasible. The National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) do not require agencies to consider alternatives or mitigation measures that are infeasible. Section 2.4.4.2 of the Draft EIS/EIR explained why a full underground alignment and partial underground alignments were rejected from further consideration as infeasible. See response CR-GEN-3 regarding the Cut-and-Cover Study completed after circulation of the Draft EIS/EIR. See also response to comment CC-8-8.
CC-8-12	See response CR-GEN-1 regarding identification of the LPA and responses to comments CC-8-2 and CC-8-8 regarding an underground alignment. Terminating the alignment in Bellflower is not required for implementation of the LPA.
CC-8-13	The City of Cerritos preference is noted. See responses to comments CC-8-2 and CC-8-8 regarding grade separation. Comments are addressed individually in the responses that follow.
CC-8-14	The traffic analysis methodology is summarized in Chapter 3, Section 3.2 of the Draft EIS/EIR. As stated, the analysis considered proximity to at-grade crossings where intersections could experience delay due to gate down times; changes to the roadway network; increase in traffic due to vehicles accessing or departing park-and-ride facilities; and traffic volumes at each intersection. The intersections requested in the comment were reviewed to determine whether they should be included in the Affected Area for the traffic analysis. Based on forecasted project-related trip outputs from the Metro Travel Demand Model, the following seven intersections were added to the traffic analysis because the Project is projected to add 50 or more vehicles during the peak hour in 2042. The results of the analysis are included in Chapter 3, Section 3.4.1.2 of the Final EIS/EIR and Section 5.1.2 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* for these intersections: ▪ South Street/Norwalk Boulevard ▪ South Street/Bloomfield Avenue ▪ South Street/Alburtis Avenue ▪ Pioneer Boulevard/195th Street ▪ Pioneer Boulevard/Los Coyotes Boulevard ▪ Pioneer Boulevard/Del Amo Boulevard ▪ Pioneer Boulevard/183rd Street No adverse effects were identified in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* at any of these intersections. It should also be noted that under CEQA, a project's effect on automobile delay shall not constitute a significant environmental impact (State CEQA Guidelines, § 15064.3[a]). The Project will reduce vehicle miles traveled (VMT) in the region, thereby providing an environmental benefit related to transportation impacts.

Comment ID	Response
CC-8-15	The Project need only mitigate impacts where the Project will result in an adverse impact under NEPA or a significant impact under CEQA. The provision of widened bridges that are not related to adverse or significant impacts from the Project would be considered a betterment and are not part of the Purpose and Need of the Project. The Project will not result in adverse or significant impacts to the bridges mentioned in the comment and, therefore, public funding cannot be used to widen the bridges as part of the Project.
CC-8-16	The new intersection at the parking structure entrance/Solana Place on Pioneer Boulevard that will be added and signalized as part of the LPA was analyzed and is included in Table 5.4 in Section 5.1.2 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* and in Chapter 3, Section 3.4.1.2 of the Final EIS/EIR. The commercial driveway to the south is not an intersection and was therefore not analyzed in the traffic analysis.
CC-8-17	As stated in Chapter 3, Section 3.4.4.4 of the Draft EIS/EIR, the demand for parking at the Pioneer Station under Alternative 3 is 1,090 spaces, which would be accommodated with the parking supply at this station. See response CR-TRA-1 regarding spillover parking impacts and additional transit parking. Parking demand from the Metro Travel Demand Model was updated in Chapter 3, Section 3.4.4.2 of the Final EIS/EIR to include all nine stations along the LPA. Consistent with the Draft EIS/EIR, the supply of parking in the parking structure will accommodate demand at the Pioneer Station. Mitigation Measure TRA-21 (Parking Monitoring and Community Outreach) in the Draft EIS/EIR, now referred to as Mitigation Measure TRA-19 in the Final EIS/EIR, is not a deferral of analysis or mitigation. Although adverse effects associated with spillover parking are not anticipated, this measure will be implemented because parking demand, the subsequent strategies that may be utilized, and the community response are unknown. Mitigation Measure TRA-21 commits Metro to studying actual conditions after the Project opens, comparing the demand to surveys completed six months prior to opening, and working with the cities to identify measures to address spillover parking if it occurs. The measure also applies to 0.5 mile around all stations, even those without proposed transit parking. Refer to CR-GEN-5 regarding mitigation under NEPA and CEQA. It should also be noted that CEQA does not require an analysis of or mitigation measures for parking shortages; an EIR is only required to address parking shortages to the extent the shortage has secondary impacts on the environment. (*Save Our Access-San Gabriel Mountains v. Watershed Conservation Authority* (2021) 68 Cal.App.5th 8.) No such secondary impacts have been identified.
CC-8-18	See response to comment CC-8-17. A mitigation measure to provide the projected parking demand under Alternative 1 was not added to the Final EIS/EIR because the parking structure will accommodate the demand projected with implementation of the LPA. The timeline for implementing an extension north of the Slauson/A Line to LA Union Station is unknown and therefore, any demand that could materialize with a future extension is speculative.
CC-8-19	The measure described is not a standard mitigation practice. Refer to CR-GEN-5 regarding mitigation under NEPA and CEQA. Refer also to response to comment CC-8-17 regarding the adequacy of the existing parking mitigation measures.

Comment ID	Response
CC-8-20	As stated in Section 3.2.2 of the Draft EIS/EIR, the analysis of the bus-rail interface focused on the interaction between bus services and the new light rail transit (LRT) stations in the 2042 horizon year. Ridership will likely change on Study Area bus routes, particularly those reconfigured to provide feeder services to the proposed station. The transportation impact analysis uses the Metro Travel Demand Model to forecast ridership and traffic volumes in 2042, which includes the number of buses on the arterial streets from existing and planned bus services. As such, the traffic operations analysis does consider bus and vehicular traffic to the extent that information can be reasonably forecasted. However, bus services are continually reviewed and adjusted by regional and local transit agencies, including routes, headways, and schedules, in order to meet the needs of transit riders. Prior to opening a new rail transit line, Metro completes a bus-rail interface study. As part of this study, Metro coordinates with other jurisdictions and transit service providers to determine if adjustments are needed to existing or planned bus routes to align with the service provided by the new rail transit line. This study occurs closer to opening in order to ensure that adjustments to bus services reflect the population, employment, and ridership demand in the service area. Preparing that study at this time would be speculative, particularly in light of the lingering effects of the COVID-19 pandemic. Future changes or additions to bus service would follow the requirements of the applicable agency prior to implementation. Therefore, due to the speculative nature of future bus operation needs, the specifications of the bus bays, including the precise location and number of bus bays, will need to be further determined and evaluated during future stages of the design, prior to the start of revenue service. The design and implementation of the bus bays will be done in coordination with the city per an executed Master Cooperative Agreement (MCA). Every effort will be taken to place bus bays in locations that minimize effects to traffic and pedestrian circulation. If required, supplemental environmental documentation will be completed once the location of bus bays and corresponding service is determined. The comment regarding the use of concrete will be considered as design advances.
CC-8-21	The traffic analysis in the Draft EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D of the Draft EIS/EIR) considered the closures of both 188th and 187th Streets, including the diversion of traffic to other nearby streets. The results of the traffic analysis were included in Table 3.14 in Chapter 3 of the Draft EIS/EIR. There will not be intersection impacts as a result of the closures and diversion of traffic; therefore, mitigation is not required. Refer specifically to Intersections 97 (187th Street/Pioneer Boulevard) and 98 (188th Street/Pioneer Boulevard). Both 187th and 188th are residential streets serving the City of Artesia. There is limited through traffic on these streets that will be diverted into the City of Cerritos, west of Gridley Road. 188th Street ends in a cul-de-sac east of the Target department store, so existing through traffic volumes are even lower. Metro coordinated with the City of Artesia and California Public Utilities Commission (CPUC) in 2022 regarding the closure of 186th or 187th Street. Based on this coordination, the Final EIS/EIR includes a design option that evaluates closure of 186th Street with 187th Street open. Based on meetings with CPUC, and given the proximity of 186th and 187th Street, one of the streets must be closed with project implementation. At a meeting on February 21, 2023, Metro informed representatives of the City of Cerritos of this coordination and the inclusion of a design option. Traffic analysis was completed for the design option and included in Chapter 3, Section 3.4.1.3 of the Final EIS/EIR. A decision will be made as to which street remains open prior to issuance of the Record of Decision.

Comment ID	Response
CC-8-22	Text in Chapter 1, Section 1.6.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (previously Appendix D of the Draft EIS/EIR), has been updated to state that both Synchro and SimTraffic, the companion simulation tool, were used to conduct traffic analysis. SimTraffic allows for the modeling of at-grade crossings, and implicitly considers the coordination effects of adjacent signals. It is a stochastic (random) process to simulate the vehicular traffic on the roads, and there are different results with each run. To account for the variations, five SimTraffic runs were conducted, and the average of the results was reported. The Synchro output files include details for the parameters used in the analysis. Synchro default values, which represent common practice, were used in some cases. Consistent values for these input parameters were used to allow for a consistent comparison between intersections in different jurisdictions and in future years where both field conditions and overall traffic conditions (e.g., improved vehicle technology) may change. Specific parameters were: ▪ Saturation flow rate: 1,900 vehicles/hour/lane ▪ Lane width: 12 feet ▪ Grade: 0% ▪ Storage length (for pockets): field-measured or from 10% engineering plans, from the end of the taper length (full width of pocket) to the limit line ▪ Link speed: coded directly based on field speed limit ▪ Peak hour factor: 0.92
CC-8-23	To provide a conservative analysis, tail tracks were analyzed as part of the evaluation of the Pioneer Station, with an assumption of a gate down time of 45 seconds, a value that is consistent with the other terminus station locations in the Metro Rail system. However, typical train operations at the Pioneer Station would utilize the front-end cross over north of the station platform to change train directions. The usage of the back-end crossovers and tail track provides operational flexibility in the event of a service disruption or special service, and is only employed during normal operations. Therefore, trains crossing Pioneer Boulevard to utilize the tail tracks will be an infrequent occurrence.
CC-8-24	See response to comment CC-8-23 regarding use of the tail tracks crossing Pioneer Boulevard. Emergency access was evaluated in Draft EIS/EIR Chapter 4, Sections 4.18 and 4.19.3.18 during operation and construction of the Project, respectively. Project Measures SAF PM-1 (Emergency Access) (described in Chapter 4, Section 4.18.4.1 of the Draft EIS/EIR) and SAF PM-9 (Coordination with Police and Fire Service Providers) (described in Chapter 4, Section 4.19.3.18 of the Draft EIS/EIR) require coordination with emergency service providers during operation and construction, respectively. There are two fire stations: one on 183rd Street near Pioneer Boulevard in the City of Artesia and one on Pioneer Boulevard south of South Street in the City of Cerritos.

Comment ID	Response
CC-8-25	Appendix A, Attachment 7 in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D of the Draft EIS/EIR) includes an engineering assessment for the new westbound through lane at the intersection of Artesia Boulevard and Dumont Avenue (Intersection No. 89). The additional through lane design is shown in the Grade Crossing and Intersection Plans (Appendix B) of the Final EIS/EIR on Sheets CS-215 and T-011. The additional lane does not need to extend to the Artesia Boulevard/Studebaker Road intersection because there is not an adverse effect at that intersection. During the final design phase, Metro will coordinate with the City regarding the starting point for the additional lane, but the critical traffic operations component is the new lane at the grade crossing and through the intersection. Metro will coordinate with city staff per an executed MCA. The MCAs provide cities the opportunity to review design packages and provide comments for project components located within their jurisdiction. Note –Mitigation Measure TRA-18 in the Draft EIS/EIR has been renumbered as TRA-16 in the Final EIS/EIR. The text of the mitigation measure remains unchanged since the Draft EIS/EIR.
CC-8-26	The table has been reviewed and modified to remove reference of lane reductions along South Street. No lane reduction will be required along South Street, as the LPA terminates just north of South Street within the Pacific Electric Right-of-Way (PEROW). Reference of lane reductions along South Street in the Draft EIS/EIR has been removed for the Final EIS/EIR.
CC-8-27	Table 3.51, Anticipated Construction-Related Closures, of the Draft EIS/EIR has been reviewed and modified to remove reference of permanent driveway closures at the Extra Space Storage property along Artesia Boulevard. The driveway access has been designed and is included in the Intersection Plans (Appendix B) of this Final EIS/EIR on Sheet T-011. References of driveway closures at the Extra Space Storage property along Artesia Boulevard in the Draft EIS/EIR have been removed for the Final EIS/EIR. Permanent access to the Navens Horse Stable and Cerritos Industrial Park businesses is unaffected by the Project.
CC-8-28	Refer to CR-GEN-5 regarding mitigation. The Project need only mitigate impacts where the Project will result in an adverse impact under NEPA or a significant impact under CEQA. Mitigation has been identified for the two intersections in the City of Cerritos where the Project will result in adverse impacts (Final EIS/EIR Mitigation Measures TRA-16 (Artesia Boulevard/ Dumont Avenue) and TRA-17 (Business Circle/ Studebaker Road) (referred to as Mitigation Measures TRA-18 and TRA-19 in the Draft EIS/EIR; no change has been made to the text of the mitigation measures). A traffic signal is proposed at Business Circle/Studebaker Road under TRA-17. As design advances, Metro will coordinate with the City regarding the traffic signal plan.
CC-8-29	Chapter 2, Section 2.4.4 of the Draft EIS/EIR summarizes the project refinements that were adopted by the Metro Board in 2018. These refinements include the elimination of the 183rd/Gridley Station due to lack of community support, limited ridership potential, and proximity to the Pioneer Station in the City of Artesia. As noted in Chapter 2, Section 2.4.1.3, the aerial alignment at 183rd Street and Gridley Road crossing has been designed not to preclude a future station at this location. The design of the alignment to accommodate a potential future station has been discussed in meetings with representatives of the City of Cerritos since circulation of the Draft EIS/EIR. See also response to comment CC-8-3.
CC-8-30	See responses to comments CC-8-3 and CC-8-29. See response CR-GEN-3 regarding the Cut-and-Cover Study. The alternatives/mitigation measures suggested in the comment would not minimize or avoid any of the adverse impacts under NEPA or significant impacts under CEQA identified in the EIS/EIR. Therefore, they have not been added to the Final EIS/EIR; refer to CR-GEN-5 regarding mitigation measures.

Comment ID	Response
CC-8-31	Section 22.30.700(3)(a) of the City of Cerritos Municipal Code is not relevant as that code provision governs building setbacks and the LRT alignment is not a building. The comment has not identified any "standards for circulation, noise, setbacks, buffer areas, landscaping and architecture" that apply to the Project or with which the Project conflicts. The Project is therefore not inconsistent with Policy LU-9.1 of the City of Cerritos General Plan Land Use Element. Although not required, Project Measure VA PM-8 (Residential Screening for Aerial Structures) (refer to Chapter 4, Section 4.4.4.1 of the Final EIS/EIR for a description of this measure) has been added in the Final EIS/EIR. This project measure requires privacy screening along portions of the aerial structure adjacent to the rear of residential properties in the Cities of Paramount, Bellflower, and Cerritos if the soundwall in those locations will not be sufficiently tall to provide similar privacy screenings. At the intersection of 183rd Street and Gridley Road, the soundwall on the aerial alignment will be sufficiently tall to block the line of sight from LRT vehicles to the adjacent residential properties. Refer also to response CR-VA-1. Additionally, Metro has extensively coordinated with the City of Cerritos regarding project design and will continue to do so as design progresses.
CC-8-32	The communities and neighborhoods analysis set forth in Chapter 4, Section 4.2 of the Draft EIS/EIR considers the potential for the Build Alternatives to create physical, social, or psychological barriers within an established community or neighborhood. Primary components that affect communities and neighborhood include access and mobility, community character and cohesion, and community stability. Privacy concerns do not create physical, social, or psychological barriers and will not affect access and mobility, community character and cohesion, and community stability. Chapter 4, Section 4.4.3.2 of the Final EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* (previously Appendix I to the Draft EIS/EIR) have been updated to consider the change in visual character at the rear yards of residential properties. However, with regard to privacy, the visual and aesthetics impact analysis follows the principles in the Federal Highway Administration's (FHWA) Guidelines for the Visual Impact Assessment of Highway Projects (adopted January 2015), as well as the CEQA Guidelines, including Appendix G of the CEQA Guidelines. The Draft EIS/EIR addresses how the physical features of the Project would change the visual character and aesthetics of the environment. Consistent with the FHWA guidelines and CEQA Guidelines, adverse effects on visual character and quality are associated with whether the project alternative involves the removal of features with aesthetic value (such as the removal of a scenic resource), introduction of contrasting urban features in the local area, and the degree to which project elements would detract from the visual character of the area. Privacy concerns do not address physical changes in the environment that could affect the visual character or aesthetics of an area. A project component is considered compatible with visual character of the Affected Area if the component's scale, massing, form, lighting, and potential to cause glare does not contrast or conflict with the visual elements of the Affected Area. As noted in the response to comment CC-8-31, to address privacy concerns, Project Measure VA PM-8 (Residential Screening for Aerial Structures) has been added to Section 4.4.4.1 of the Final EIS/EIR, as well as Section 8.1.1 of the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report*. Refer to the response to CC-8-31 for information on how this measure applies at 183rd Street and Gridley Road. See also response CR-VA-1 regarding screening.

Comment ID	Response
CC-8-33	NEPA and CEQA do not require an EIS/EIR to include visual renderings as part of a visual impact assessment. In response to this comment, however, a visual rendering of the proposed aerial structure at Gridley Road/183rd Street has been added to Chapter 4, Section 4.4 of the Final EIS/EIR as Figure 4.4-9 and to the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* as Figure 5-8 in Section 5.2.5. As shown in the visual rendering and as discussed in these sections of the documents, while the aerial structure will be a new visual feature in the area, it will be consistent with the scale and massing of the one- to three-story structures in the Affected Area. The project components will not detract from the visual character and quality of the Affected Area. The visual character conclusion in the Draft EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* remain unchanged. See response to comment CC-8-32 with regard to privacy.
CC-8-34	See response to comments CC-8-31 and CC-8-32 with regard to privacy screening, and response CR-VA-1. Metro will coordinate with city staff per executed MCAs, which provide cities the opportunity to review design packages and provide comments.
CC-8-35	See responses to comments CC-8-32 with regard to privacy and CC-8-37 regarding landscaping.
CC-8-36	The design of the aerial structure has been revised since circulation of the Draft EIS/EIR as a result of coordination with the City of Cerritos. The aerial structure will be supported by columns over the Gridley Road/183rd Street intersection and up to approximately 670 feet northwest of the intersection. Design has been updated to include columns south of the intersection in place of the retained fill identified in the Draft EIS/EIR. Metro met with City of Artesia and Cerritos staff on September 29, 2022, where the height and location of the retaining wall were clarified. The revised configuration is included in the LRT Plans (Appendix B) of the Final EIS/EIR on Sheet T-260.
CC-8-37	A new mitigation measure is not required because landscaping along the alignment is a component of the Project, as addressed in VA PM-3 (Landscaping) (see Chapter 4, Section 4.4.4.1 of the Draft EIS/EIR). Landscaping will be installed, as appropriate and as practicable, space permitting, to achieve an effective integration between the aerial structures and their surrounding environment. As stated for VA PM-3 (Landscaping), landscaping will be designed per Metro Rail Design Criteria (MRDC) or equivalent and Systemwide Station Design Standards. The MRDC requires that landscaping be used, as appropriate, for graffiti management. Additionally, the MRDC requires that landscaping comply with local code requirements. The MCAs provide cities the opportunity to review as design is advanced (30%, 60%, and 90%) and provide comments.
CC-8-38	A new mitigation measure is not required because the design of the soundwalls is required to follow the MRDC or equivalent criteria, Standard/Directive Drawings, WSAB Urban Design Report, and WSAB Urban Design Guide. Per the MCA, the city will have the opportunity to review the design of the soundwalls and provide comments as design advances.

Comment ID	Response
CC-8-39	Metro began preparing the First/Last Mile (FLM) plan after identification of the LPA and examined connections to the surrounding community. FLM planning efforts focus on specific pedestrian connections within 0.5 mile of stations and connections to bike networks within 3 miles of stations in coordination with cities and key stakeholders. Metro has coordinated with city staff as part of the FLM process. Refer to the response to comment CC-8-37 regarding landscaping. Specific landscaping, irrigation, and drainage plans have not yet been developed at this stage of design, and the power source has not been identified; however future design plans, which will include details on landscaping, irrigation, drainage, and power, will be available for review by city staff as outlined in the MCA.
CC-8-40	The elements requested in the comment do not warrant being a project measure, particularly for instances where the billboard will conflict with the footprint needed for construction or operation of the LPA. The Final EIS/EIR continues to document that billboards within the railroad right-of-way (ROW) will be removed.
CC-8-41	There are no readily available emission factors published for light rail brake wear at crossings and stations. Referenced research on transit brake dust is related to subway (enclosed underground) or operations of heavy (freight or intercity passenger) rail vehicles. The regenerative braking technologies used by LRT vehicles conserve energy and result in less friction braking than heavy rail vehicles. The referenced studies are generally focused on enclosed subway operations and by and large do not consider regenerative braking in their findings. One study "Impacts of Subway System Modifications on Air Quality in Subway Platforms and Trains" by Van Ryswyk et. al. Environ. Sci. Technol. 2021, 55, 11133–11143 provides some limited data on regenerative braking within an enclosed subway environment. Toronto converted one of its transit lines to rolling stock with regenerative braking and the study found "decreased use of friction brakes may have yielded a reduction in the emission of brake dust and better air quality." No similar data is available for well ventilated (open air) operations because light rail brake dust is not a recognized concern in such an environment. Compared to the systems referenced in the studies provided by the City of Cerritos, regenerative braking of light rail vehicles would qualify as alternative technology designed to minimize or eliminate such impacts.

Comment ID	Response
CC-8-42	Applicable and feasible mitigation measures have been applied where moderate and severe noise impacts were identified. These measures include soundwalls, low impact frogs to reduce crossover noise, and traction power substation (TPSS) noise-reduction measures. Within the Draft EIS/EIR, Mitigation Measures NOI-4 (Crossing Signal Bells) and NOI-5 (Gate-Down-Bell-Stop Variance) were recommended to further reduce noise at grade crossings but require CPUC approval. Thus, Mitigation Measures NOI-4 (Crossing Signal Bells) and NOI-5 (Gate-Down-Bell-Stop Variance) were not included as part of the mitigated analysis in the Draft EIS/EIR. Based on Metro's experience successfully implementing bell shrouds and gate-down-bell stop variances on other transit lines and coordination with CPUC subsequent to circulation of the Draft EIS/EIR, NOI-4 (Crossing Signal Bells) and NOI-5 (Gate-Down-Bell-Stop Variance) have now been incorporated as project features included as part of project design (NOI PM-1 and NOI PM-2, respectively) within the Final EIS/EIR and the associated reductions are included in the analysis. The two mitigation measures were incorporated as project measures as a result of coordination with CPUC, which confirmed that they were feasible and are anticipated to be approved as part of the Project. These measures would be equally as effective as the NOI-4 (Crossing Signal Bells) and NOI-5 (Gate-Down-Bell-Stop Variance). Project measures NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop Variance) remain subject to CPUC approval. Additional analysis has been prepared since the Draft EIS/EIR to identify possible additional noise-reduction measures. This includes the consideration of soundwalls heights greater than 8 feet and refinements to the noise model to better reflect real world conditions (i.e., topography, elevation, operational speeds of LRT). The noise analysis in Sections 4.7.3 and 4.7.4 of the Final EIS/EIR incorporates additional analysis completed since the Draft EIS/EIR to identify possible additional noise reductions. In the Draft EIS/EIR, moderate impacts at two clusters and severe impacts at six clusters remained after implementation of mitigation in the City of Cerritos. Since preparation of the Draft EIS/EIR, the soundwalls in the City of Cerritos were increased from heights of 4 to 8 feet to heights of 10 to 12 feet to provide greater noise-reduction benefits at sensitive receptors. Based on the additional analysis prepared for the Final EIS/EIR, five moderate impacts and no severe impacts will remain in the City of Cerritos. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR). See Common Response CR-GEN-5 regarding implementation and recommendation of feasible mitigation measures. See Common Response CR-GEN-3 regarding the Cut-and-Cover Study.
CC-8-43	Rosewood Park was not included as a noise-sensitive use because it is an active use park with basketball courts and playground equipment. The 2018 FTA Transit Noise and Vibration Impact Assessment Manual states that, "Most parks used primarily for active recreation such as sports complexes and bike or running paths are not considered noise-sensitive. However, some parks (even some in dense urban areas) are primarily used for passive recreation such as reading, conversation, or meditation. These places, which may be valued as havens from the noise and rapid pace of everyday city life, are treated as noise-sensitive...." The active recreation elements associated with Rosewood Park imply that the park was not created to be a haven to escape city noise. The methodology for identification of passive versus active parks for inclusion as a sensitive receptor was applied consistently in all jurisdictions.

Comment ID	Response
CC-8-44	The noise analysis prepared for the EIS/EIR follows the General Noise Assessment methodology for fixed-guideway transit set forth in the 2018 *FTA Transit Noise and Vibration Impact Assessment Manual*. The FTA Manual recommends comparing existing noise to project noise at each noise-sensitive land use, rather than developing noise impact contours (FTA Manual, Section 4.4, p. 53). The reason for this is that an inventory of noise impacts (the approach used in the Draft EIS/EIR) quantifies the noise impact at each noise-sensitive land use and indicates the severity of the impact. Noise contours, in contrast, provide only general information, which can help an agency narrow down major alignment options with numerous noise-sensitive land uses, but does not provide a quantified, impact-specific analysis. The noise analysis in the Draft and Final EIS/EIR includes detailed noise levels at identified sensitive receptors, their potential to experience noise impacts, mitigation reductions, and identification of residual impacts. Existing ambient noise levels were measured at sensitive receptors, which includes noise generated by existing roadways. See Common Response CR-NOI-2 regarding guidance used for the noise impacts analysis and proposed mitigation measures to reduce noise levels during operational activities. See Common Response CR-NOI-2 for construction activities.
CC-8-45	See response to comment CC-8-42 regarding mitigation considered for noise impacts. Mitigation measures to minimize noise levels do not include double-paned windows, sound insulation, or sound curtains. The FTA noise impact criteria are exterior noise standards and window or sound insulation or curtains would not reduce exterior noise levels. Window insulation is also ineffective when windows are opened allowing noise to enter the residence. Buildings also have varying noise-reduction effects dependent on the construction of the building. Insulation of windows may not result in adequate noise reduction if other house components, such as unsealed doors and walls, do not provide adequate noise insulation. Noise mitigation is most effective when applied at the source because it limits the noise before it gets to the sensitive receiver and has less variability in effectiveness. Mitigation Measures NOI-1 (Soundwalls), NOI-2 (Low Impact Frogs), NOI-3 (Wheel Squeal Noise Monitoring), Project Measures NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop Variance) will be implemented to reduce noise from the light rail vehicle. See response CR-GEN-5 related to implementation and recommendation of feasible mitigation measures. Where noise impacts will not occur, mitigation is not required. Providing noise-reduction measures where noise impacts were not identified and are not related to adverse or significant impacts would be considered a betterment and is not part of the Purpose and Need of the Project. Since preparation of the Draft EIS/EIR, the soundwalls in the City of Cerritos were increased from heights of 4 to 8 feet to heights of 10 to 12 feet to provide greater noise-reduction benefits at sensitive receptors. Regarding properties between Rosewood Park and Gridley Road, the soundwall will range in height between 10 to 12 feet and will be constructed at-grade and along the aerial structure. Noise levels will be reduced to below the FTA severe noise impact criteria, although five moderate impacts will remain.
CC-8-46	See response to comment CC-8-43 regarding Rosewood Park.

Comment ID	Response
CC-8-47	The noted TPSS at 183rd Street and Gridley Road has been moved back to the City of Artesia as requested. The noise analysis has been updated in Chapter 4, Section 4.7.3.2 of the Final EIS/EIR to reflect the revised location and closest sensitive receptor. No impacts have been identified related to the TPSS at 18^{3r}d Street and Gridley Road and mitigation, including undergrounding or enclosure with masonry block walls, is not required. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR). The bike path is not considered a sensitive receptor as users are transient and not occupying one location to enjoy quiet. The FTA Transit Noise and Vibration Impact Assessment guidance does not consider this use a sensitive receptor. The relocation of the TPSS will not cause any new noise or physical impacts to the bike path. The TPSS will be located beneath the LRT viaduct at-grade. The noise analysis in the Draft EIS/EIR evaluated TPSS facilities in Chapter 4, Section 4.7.3.1. Mitigation Measure NOI-6 (TPSS Noise Reduction) in the Draft EIS/EIR identifies several methods to reduce TPSS noise for TPSS units that will result in noise impacts (this measure is referred to as Mitigation Measure NOI-4 in the Final EIS/EIR). Providing noise-reduction measures where the TPSS will not result in a noise impact would constitute a betterment.
CC-8-48	The establishment of Quiet Zones is governed by the Federal Railroad Administration regulations and is applicable to freight and commuter rail and not LRT. No active freight crossings exist in the area of the LPA within the City of Cerritos. Further, only the governmental entity responsible for traffic control or law enforcement at the crossings is permitted to create a quiet zone. Mitigation Measures NOI-4 (Crossing Signal Bells) and NOI-5 (Gate-Down-Bell-Stop Variance) from the Draft EIS/EIR will result in similar effects to a Quiet Zone by reducing the bell ringing noise and stopping bell ringing after the crossing gates are lowered. As stated in the response to comment CC-8-42, Draft EIS/EIR Mitigation Measures NOI-4 (Crossing Signal Bells) and NOI-5 (Gate-Down-Bell-Stop Variance) are now incorporated as project features (NOI PM-1 and NOI PM-2, respectively) within the Final EIS/EIR and the associated reductions are included in the analysis. Project Measures NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop Variance) remain subject to CPUC approval.
CC-8-49	See Common Response CR-NOI-1 and CR-NOI-2 regarding guidance used for the construction and operational noise impacts analysis and proposed mitigation measures to reduce noise levels during construction and operational activities. Metro policy is to ensure system changes prioritize those most in need of improved access to opportunity, which includes providing transportation choices at the time people need to travel. Reducing nighttime service hours as requested by the comment would interfere with this basic objective of the Project and is therefore considered infeasible. As noted in Chapter 2, Section 2.5.5 and in Table 2.6 of the Draft EIS/EIR, the Project will provide service between 4:00 a.m. and 2:00 a.m., although with longer headways during early morning and late evening. For example, service will have approximately 5-minute headways during peak travel times, and headways during early morning hours will be approximately 20 minutes with a reduced number of cars, which reduces the overall noise level.
CC-8-50	See response to comment CC-8-42 regarding mitigation measures. Mitigation Measure NOI-2 requires low impact frogs (crossing points between two rails) to be installed to reduce cross-over noise on tracks. Additionally, Mitigation Measure NOI-3 requires Metro to conduct wheel squeal monitoring and to use wayside rail lubrication if wheel squeal occurs. The comment does not identify any specific wheel or rail materials or technology that would feasibly further reduce noise impacts.

Comment ID	Response
CC-8-51	Table 4.1 in Section 4.5 of the *West Santa Ana Branch Transit Corridor Project Final Hazardous Materials Impact Analysis Report* (previously Appendix S to the Draft EIS/EIR) has been modified to identify high pressure natural gas pipelines within a 200-foot radius surrounding the project footprint. Similar to liquid pipelines, as required by California law, Government Code 4216, Underground Service Alert (a utility marking service) will be notified prior to the commencement of any subsurface excavation, which will reduce pipeline risks during construction. A high-pressure natural gas pipeline was not identified from Bellflower to Artesia Boulevard; however, a liquid petroleum pipeline is located within this area, the LS-120 Watson Colton pipeline operated by Kinder Morgan. The Kinder Morgan pipeline was discussed in the *West Santa Ana Branch Transit Corridor Project Final Construction Methods Report* (Appendix L of the Draft EIS/EIR) in regard to the City of Bellflower. The hazardous materials analysis and documentation in the Final EIS/EIR have been updated to include extension of this pipeline into the City of Cerritos. Utility relocation plans have not been developed at this stage in the project design process. As noted in Sections 4.19.2.3 and 4.23.1.4 of the Draft EIS/EIR, all utility conflicts will be coordinated with the applicable utility provider and will consider whether utilities can be safely protected in place during construction and operation or require relocation. A mitigation measure is not required. Chapter 4, Section 4.19.3.10 of the Draft EIS/EIR includes Project Measure HAZ PM-5 (Property Assessment – Phase I and II ESAs) which requires assessment of land use history for each parcel/property that would be acquired/utilized for the Project, including the area surrounding this bridge and pipeline. If soil or groundwater contamination is encountered, Project Measures HAZ PM-7 (Disposal of Groundwater) and HAZ PM-9 (Contaminated Soil, Soil Vapor, and Groundwater), included in Chapter 4, Section 4.19.3.10 of the Draft EIS/EIR, will be implemented.
CC-8-52	As discussed in Chapter 4, Section 4.23.1.4 of the Draft EIS/EIR, the Project will not result in a significant impact with respect to water supplies. Mitigation measures are therefore not required. Metro's Sustainability Strategic Plan includes goals to optimize and manage Metro's water use and to manage wastewater and stormwater constructively. Irrigation management will be developed in a manner that is consistent with the Sustainability Strategic Plan as design advances.
CC-8-53	The TPSSs required to power the WSAB Project will be connected to the electric utilities within the jurisdiction where they are located. For example, a TPSS located in the City of Artesia cannot be connected to the electrical grid operated by Southern California Edison. As discussed in Chapter 4, Section 4.12 of the Draft EIS/EIR and Final EIS/EIR, the Project will not result in a significant impact related to energy. A mitigation measure is not required.
CC-8-54	See response CR-GEN-1 regarding identification of the LPA. Additional text on the positive effects on property values near transit infrastructure has been incorporated in the Final EIS/EIR in Chapter 4, Section 4.17.3.2 under the heading "Long-Term Impacts on Property Values." As stated in Chapter 4, Section 4.17.3.2 of the Draft EIS/EIR, under the subheading "Long Term Impacts on Property Values," the Project is expected to attract continued investment in the areas it serves. The added investment would likely result in increased property values for businesses and residences near station areas. Potential reductions in value because of the nuisance effects associated with the Project, such as noise impacts, would be minimized with implementation of the noise project measures and mitigation measures included in Section 4.7.4 of the Draft EIS/EIR. Overall, the potential for economic development near station areas is most directly related to the land use plans and policies put in place by the local jurisdictions surrounding the station.

Comment ID	Response
CC-8-55	Chapter 4, Section 4.19.3.17 of the Final EIS/EIR includes additional qualitative discussion on the potential impacts to retail sales during construction. Chapter 4, Section 4.17.3.2 of the Final EIS/EIR includes additional discussion of retail sales impacts during operations. The effect on property tax revenues because of changes in right-of-way is one way to measure potential revenue effects of a project. For the City of Cerritos specifically, the overall impact to retail sales resulting from modified access because of temporary lane closures and roadway modifications would be minimal. Chapter 3, Sections 3.4.1 and 3.5.1 of the Draft EIS/EIR show the Project will not have adverse effects on the intersections studied in Cerritos after project measures and mitigation measures are implemented. Shopping centers are generally destination trips and have multiple access points, which makes them more resilient to changes in the roadway network. The Project is expected to have minimal impact on the automobile sales sector, which is a large producer of sales tax revenue. Chapter 4, Section 4.19.3.17 of the Draft EIS/EIR discusses how the area would experience positive retail sales revenue impacts associated with construction spending and spending by construction workers. The proximity of the shopping centers to Pioneer Station would result in additional access to customers who do not drive, providing a source of increased retail sales during operation.
CC-8-56	Refer to response to CC-8-28. Traffic impacts within the City of Cerritos will be fully mitigated with mitigation identified in the Draft EIS/EIR. Therefore, provision of a shuttle is not required to address traffic impacts from the Project.
CC-8-57	Construction effects, such as nuisance effects, parking impacts, and temporary access changes for businesses, were evaluated in Chapter 4, Section 4.19.3.17 under the subheading "Localized Project Impacts" of the Draft EIS/EIR. Implementation of Mitigation Measures COM-1 (Construction Outreach Plan) and TRA-23 (Loss of Parking [Construction]) would reduce potential impacts. Mitigation Measure COM-1 (Construction Outreach Plan) requires development of a construction outreach plan to mitigate impacts to businesses near the project alignment during construction. Specifically, it focuses on access to businesses and identifying detours when necessary. Additionally, it discusses specific signage/marketing to support businesses during construction. Metro will use the Business Interruption Fund to financially assist small businesses along transit corridors during construction. Programs such as the Business Interruption Fund are approved by the Metro Board on a per-project basis and would occur after certification of the Final EIR and issuance of the Record of Decision, and closer to the start of construction.

Comment ID	Response
CC-8-58	As shown on sheet CS-214 of the Final Advanced Conceptual Alignment Design Part 2 (Appendix B of the Draft EIS/EIR), Metro will implement safety features at the Artesia Boulevard and Studebaker Road crossings for pedestrians. These features will include pedestrian crossing gates with signage and flashing lights. In addition, there will be fencing outside of the crossing to restrict unauthorized access into Metro right-of-way. As indicated in Chapter 4, Section 4.18.2.2 under the subheading "Pedestrian, Bicyclist, and Motorist Safety" of the Draft EIS/EIR, "Metro is continually working to improve vehicular and pedestrian safety along its rail lines and has implemented several programs (such as the Rail Safety Orientation Tour Program and the Rail Safety Education Program)" to educate students within the project study area about safety near transit vehicles and facilities. Mitigation Measure SAF-2 (School District Coordination) (described in Chapter 4, Section 4.19.3.18 of the Draft EIS/EIR) will require Metro to coordinate with and notify school districts and individual school administrators, such as Valley Christian School and Gahr High School, to maintain or modify safe and convenient pedestrian, bicycle, and bus routes to schools as necessary during and after construction. This also includes the publication and distribution of alternative pedestrian and bicycle route maps. With implementation of Mitigation Measure SAF-2 (School District Coordination), impacts during construction will be minimized and there will not be an adverse effect on the safety of pedestrians and bicyclists. It should also be noted that Metro examined safe connections to the surrounding community as part of the FLM plan. FLM planning efforts focused on specific pedestrian connections within 0.5 mile of stations and connections to bike networks within 3 miles of stations in coordination with cities and key stakeholders, including Safe Routes to School programs. Based on the features cited in this response, the analysis presented in Chapter 4, Section 4.18 of the Draft EIS/EIR, Mitigation Measure SAF-2 (School District Coordination), and the FLM planning, the Project will provide a safe and secure environment for pedestrians and bicyclists. Therefore, no additional analysis or mitigation measures are needed in the Final EIS/EIR.
CC-8-59	See responses CR-SAF-1 regarding safety and security and CR-SAF-3 regarding security patrols and enforcement. Security on the WSAB line, including at stations, will be provided by Metro's law enforcement and its law enforcement contractors, who are assigned to the Metro system as part of their contract. These resources are separate from the Los Angeles County Sheriff's Department deputies assigned to the City of Cerritos. As a result, there will be no impact to the City of Cerritos's policing services. No additional analysis or mitigation measures are needed in the Final EIS/EIR.
CC-8-60	See response to comment CC-8-57.

Comment ID	Response
CC-8-61	Mitigation Measure COM-1 (Construction Outreach Plan) (described in Chapter 4, Section 4.19.3.2 of the Draft EIS/EIR), requires Metro and its contractors to implement a Construction Outreach Plan that will be developed in coordination with affected communities and businesses. Pursuant to Mitigation Measure COM-1, access to businesses during operating hours will be maintained during construction to the extent practicable. In addition, pursuant to Mitigation Measure COM-1, signage alerting customers that businesses are open during construction and directing customers to business entrances will be provided and detour routes will be clearly marked. In addition, as part of the Construction Outreach Plan, a marketing plan will be developed to help further reduce impacts to businesses during construction. As concluded in Section 4.19.3.17 (Economic and Fiscal Impacts – Localized Project Impacts), with implementation of Mitigation Measure COM-1 (Community Outreach Plan) and Mitigation Measure TRA-23 (now, TRA-20) (Loss of Parking [Construction]), localized economic impacts during construction would not be adverse. Specific holiday construction freezes or moratoriums applicable within the City of Cerritos are expected to be addressed in the MCA between the City and Metro. For example, please refer to Sections 2 (relating to agreement of working hours following a joint review of the schedule) and 5 (regarding construction staging plans, including actions to maintain access to businesses adjacent to construction) of Exhibit 5 of the draft MCA circulated to the City. Metro is happy to discuss amendments to Exhibit 5 of the draft MCA to include the specific holiday construction freeze identified by the City of Cerritos in its comment.
CC-8-62	Table 4.1 in Section 4.1.1 of the *West Santa Ana Branch Transit Corridor Project Final Growth-Inducing Impact Analysis Report* has been updated to reflect the number of housing units and the corresponding percent growth for each jurisdiction. Notes within the table have also been updated to clarify the source of information. The percent growth presented in Table 4.20.1 in Chapter 4, Section 4.20.2.1 of the Final EIS/EIR has been updated to reflect the changes made to Table 4.1 from the corresponding impact report. The historic housing growth numbers presented in Table 4.20.1 in Chapter 4, Section 4.20.2 of the Draft EIS/EIR and Table 4.1 of Section 4.1.1 of the *West Santa Ana Branch Transit Corridor Project Final Growth-Inducing Impact Analysis Report* (Appendix DD to the Draft EIS/EIR) incorrectly used the household population for each jurisdiction rather than the total number of housing units available for each jurisdiction. The updated housing units table information shows a growth of 465 in housing units (3.0 percent growth) between 2000 and 2017 in the City of Cerritos. The update to the associated tables accounts for some of the 778 housing units the City of Cerritos noted in the comment. The remaining 313 housing units presented by the City of Cerritos has been added to the 2000-2017 growth. The 2017 historical population numbers have also been updated for consistency with the California Department of Finance population estimates for 2017. These updates do not affect the impact analyses or conclusions of the EIS/EIR.

Comment ID	Response
CC-8-63	The cumulative analysis presented in the Draft EIS/EIR follows the methodology prescribed by CEQA Guidelines Section 15130 and 15130(b) that states that the cumulative impacts can be based on a "summary of projections contained in an adopted local, regional, or statewide plan, or related planning document that describes or evaluates conditions contributing to the cumulative effect." This projection assumed in the Southern California Association of Governments (SCAG) 2016-2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) includes changes in jurisdictions within the project study area that are expected to take the form of new development, expansion of existing development, redevelopment/demolition, and intensification of land use densities. Although the Los Cerritos Center Expansion is not specifically listed in the Draft EIS/EIR, its projected growth in the City of Cerritos and the SCAG region are considered in the cumulative analysis. As discussed in Chapter 4, Section 4.21.2.2 of the Draft EIS/EIR, "...in most of the corridor jurisdictions, these changes have been anticipated and are incorporated into local planning processes, including the initiation and/or adoption of specific plans or transit-oriented communities anticipating the Project among other changes."
CC-8-64	This comment is not relevant to the NEPA or CEQA analysis or conclusions in the Draft EIS/EIR. Refer to CR-GEN-5 regarding mitigation.
CC-8-65	Table 3.49 in Chapter 3, Section 3.6.2.2 of the Draft EIS/EIR shows that each Build Alternative would result in lower VMT than the No Build Alternative, resulting in a reduction in the generation of on-road motor vehicle brake dust in the region, as it is proportional to the VMT in the region. The Project will improve regional air quality and will not result in adverse air quality health effects. See response CR-GEN-3 regarding consideration of a cut-and-cover underground alignment where the LPA would be elevated. Based on the Cut-and-Cover Study (Metro 2022), Metro staff determined that a cut-and-cover alignment is not a feasible alternative due to the increased costs. This conclusion was discussed with the City of Cerritos on September 22, 2022, and with the Project's TAC on October 3, 2022. See also response to comment CC-8-8.
CC-8-66	See response CR-GEN-1 regarding identification of the LPA and responses to comments CC-8-8 and CC-8-65 regarding a below-grade alignment.
CC-8-67	See response CR-GEN-1 regarding identification of the LPA and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo.
CC-8-68	Refer to response CR-FIN-1 regarding the 3% match.
CC-8-69	The comments in this submission have been addressed and responses indicate where analysis was updated to respond to comments.
CC-8-70	The comment regarding the memo prepared by Willdan Engineering staff is acknowledged. See responses to individual comments from the memo that follow.
CC-8-71	See responses to comments CC-8-52 and CC-8-64.
CC-8-72	See response to comment CC-8-53.
CC-8-73	See responses to comments CC-8-3 and CC-8-29.
CC-8-74	See response to comment CC-8-48 regarding the applicability of quiet zones.
CC-8-75	Blank pages in the Final EIS/EIR have been updated to note "This page intentionally left blank." No change has been made to the supporting documents.

Comment ID	Response
CC-8-76	Table 5.10 in the *West Santa Ana Branch Transit Corridor Project Transportation Impact Analysis Report* (previously Appendix D to the Draft EIS/EIR) has been revised to note information is shown in minutes.
CC-8-77	a) The reference is correct. Figure 1-2 shows an example of the existing Paramount/Rosecrans crossing. This crossing is an example of one of the configurations illustrated on Figure 1-1. b) See response to comment CC-8-22.
CC-8-78	See response to comment CC-8-22. Synchro and SimTraffic are both part of the same software package, but SimTraffic was specifically used to evaluate delay. The combined Synchro/SimTraffic package was used to evaluate the study intersections, using intersection geometry, traffic volumes, train schedules, and signal timing. Synchro was used to code the network, including basic details of geometry, volumes, and timing, but was not used to conduct level-of-service (LOS) analysis. The companion SimTraffic simulation tool was used to assess delay because SimTraffic considers the effects of the at-grade crossings and interactions between intersections (signal timing and queuing). Train schedules were coded into SimTraffic. To allow for a reasonable and accurate representation of the train crossing events for future train operations, a gate down event was coded at each train crossing location every 2.5 minutes. This approach represents a 5-minute headway for trains in both directions, consistent with the operating plan described in Chapter 2 of the Draft EIS/EIR. Delays and queues were "observed" from the simulation for the peak hours. For delays, the average was reported for the peak. For queues, the 95th percentile (longer than 19 of 20 cycles at each signal) was reported. The SimTraffic model is stochastic (i.e., has random elements), so five separate simulation runs were conducted for each scenario, and the average of the five runs was used to report results. These procedures are consistent with standard professional practice. Similar analysis methodologies have been applied in Metro's most recent similar environmental study (Metro Gold Line Foothill Extension Phase 2B) and other transit projects.
CC-8-79	For item (d), footnote "d" represents a roadway closure. The text has been edited accordingly. For item (e), the text has been updated as requested.
CC-8-80	Queueing analysis was conducted at the at-grade crossings using SimTraffic and summarized in Chapter 5, Table 5.5 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D of the Draft EIS/EIR). The results of the queuing analysis for the Studebaker Road crossing shows that under the forecast condition with the LPA, the 95th percentile queue will not exceed the storage space between the track and the immediate adjacent intersection of Business Circle and Studebaker Road to the north. This queuing analysis considers the amount of peak hour traffic at the train crossing based on traffic from the adjacent intersections, in this case Business Circle and Studebaker Road. Because the 95th percentile queue at the Studebaker Road crossing does not show backup beyond the available capacity, queuing analysis at the adjacent Business Circle and Studebaker Road intersection is not needed as the results show that the queue will not extend that far. The SimTraffic tool considers the effects of queues on adjacent intersections. Intersections on Artesia Boulevard, South Street, and Pioneer Boulevard were included in the traffic analysis, although not every intersection was analyzed. See the response to comment CC-8-14 regarding the additional intersections that were analyzed in response to City requests.
CC-8-81	See response to comment CC-8-17 regarding the parking analysis and response to comment CC-8-28 regarding traffic impacts in the City of Cerritos.

Comment ID	Response
CC-8-82	This project measure was discussed in Chapter 3, Section 3.5.1 of the Draft EIS/EIR. As stated in the Draft EIS/EIR, vehicle access to the parking structure will be directed through signage to enter/exit from Pioneer Boulevard. In coordination with the City of Cerritos, this project measure has been updated in Chapter 3, Section 3.5.1 of the Final EIS/EIR to include aligning the entrance/exit of the parking structure with Solana Place and installing a traffic signal (referred to as Project Measure TR PM-11 (Pioneer Station Parking Access)).
CC-8-83	The traffic analysis identified that queue lengths at the Pioneer Boulevard grade crossing will extend 112 feet to the north for th[e] 95th percentile queue. Emergency access will be maintained, as queues will not block access for an extended period and there is access on parallel streets (Clarkdale Avenue, Gridley Road, Norwalk Boulevard, and Elaine Avenue). Business access will be maintained. In areas where queues may potentially block business driveway access, signs and pavement markings (e.g., 'KEEP CLEAR') will be installed in front of the driveways to keep them clear of vehicles. Refer also to the response to comment CC-8-24 regarding emergency access.
CC-8-84	See the response to comment CC-8-25 regarding impacts at Intersection #89 and Mitigation Measure TRA-18 (referred to as Mitigation Measure TRA-16 in the Final EIS/EIR). Segment LOS is not a performance measure because the focus is on intersection operations.
CC-8-85	See the response to comment CC-8-28.
CC-8-86	See the responses to comments CC-8-14 and CC-8-81.
CC-8-87	See the response to comment CC-8-15.
CC-8-88	Ground settlement is addressed in Chapter 4, Section 4.9.3, of the Draft EIS/EIR. As part of Project Measure GEO PM-1 (Geotechnical Designs [Operation]), described in Chapter 4, Section 4.9.4.1 of the Draft EIS/EIR, geotechnical designs will be in accordance with the MRDC as well as the California Department of Transportation (Caltrans) and the County of Los Angeles Building Code design requirements for bridges, aerial structures, and building structures, as applicable. The geotechnical design reports would be based on site-specific geotechnical investigation and would provide recommendations to be implemented during design and construction that would address post-construction settlement.
CC-8-89	Soundwalls will follow the MRDC or equivalent criteria, which requires the use of landscaping on soundwalls and retaining walls, as appropriate, for graffiti management. Metro has a graffiti program that requires removal of graffiti within 24 hours of when it is reported. As explained in the *West Santa Ana Branch Transit Corridor Urban Design Report,* landscaping will require approval by Metro maintenance to ensure that plants are durable and easy to maintain over time. The level of detail requested in regard to how landscaping is maintained is not typically required or included in a project definition. Per Section 15124 of the CEQA Guidelines, a project description "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact." A project description should provide "a general description of the project's technical, economic, and environmental characteristics." Additionally, 40 CFR Part 1502 Section 1502.15 states that an EIS "shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration."
CC-8-90	Retaining walls along the retained fill segments will not provide closed spaces.

Comment ID	Response
CC-8-91	The size of TPSS units was described in the Draft EIS/EIR in Chapter 2, Section 2.5.4, which states that TPSSs will be approximately 15 feet wide by 40 feet long and 15 feet high. The locations of the TPSS units were identified in Appendix C: System Components and Ancillary Facilities. As stated therein, TPSS 2 would be located northwest of the crossing at Gridley Road and 183rd Street within Metro-owned property. The description and location of TPSS 2, as well as the noise impact analysis for that TPSS, were also summarized in Chapter 4, Table 4.7.5 in Section 4.7.3.2 of the Draft EIS/EIR. The noise analysis identified a moderate noise impact associated with TPSS 2. Mitigation Measure NOI-6 (TPSS Noise Reduction) from the Draft EIS/EIR will apply to TPSS 2 (this measure is referred to as Mitigation Measure NOI-4 in the Final EIS/EIR). This mitigation measure presents a menu of measures that could be implemented to reduce TPSS noise to below the FTA impact criteria. The specific measure(s) that will be implemented at this TPSS will be identified as project design progresses and will mitigate noise impacts associated with TPSS noise. See comment CC-8-47 for refinements to this TPSS site for the Final EIS/EIR.
CC-8-92	As discussed in response to comment CC-8-36, design of the alignment south of the intersection at 183rd Street and Gridley Road has been refined since circulation of the Draft EIS/EIR to include columns rather than a retaining wall. Metro met with staff from the Cities of Artesia and Cerritos on September 29, 2022, during which the height and location of the retaining wall were discussed. Design of the project components will follow the MRDC or equivalent criteria, the *West Santa Ana Branch Transit Corridor Urban Design Guide*, and other applicable code requirements. The MRDC requires the use of landscaping on retaining walls, as appropriate, which will soften the view and enhance the aesthetics of the walls. The MRDC requires that landscaping comply with local code requirements. Retaining walls will also follow the *West Santa Ana Branch Transit Corridor Project Urban Design Guide*, which will incorporate landscaping on or along the walls that includes vines or landscape buffer where there is adequate space to improve the aesthetic quality of the transit environment. At the tallest point, the aerial structure will be approximately 30 feet high (34 feet with a soundwall on top). The length and height of the soundwalls are designed to meet the FTA requirements. The aerial structure at Gridley Road/183rd Street will be supported by columns over the intersection and up to approximately 670 feet northwest of the intersection. The City of Cerritos will have the opportunity to review design plans as design progresses for elements within the city. It is anticipated that this participation process will be outlined in the MCA between the City of Cerritos and Metro.
CC-8-93	The noise methodology in Section 4.7.1.2 of the Final EIS/EIR has been updated to include additional references to the illustration of noise clusters in Figures 4.7-5 through 4.7-12 in the Final EIS/EIR. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR). The tables and figures included in the Draft EIS/EIR include the information necessary for disclosure of impacts and their geographic location. The requested "City" column has not been included.

Comment ID	Response
CC-8-94	The *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR) provides a detailed noise and vibration analysis, including a discussion of clusters where the Project will not result in impacts. Table 4.7.7 in Section 4.7.4.2 in the Draft EIS/EIR identifies only locations where mitigation was required and if impacts remained after mitigation. No impacts were predicted at N302 Valley Christian Campus, which is depicted in Figure 4.7-11 of the Draft EIS/EIR. The figures include all of the analyzed clusters and their final impact determination. The noise analysis in Section 4.7.4.2 of the Final EIS/EIR has been revised to state that this table identifies only locations where mitigation was required and if impacts remained after mitigation. The table omits clusters that will have mitigated impacts. The operational noise analysis considers sensitive uses located within 350 feet of the Project per the FTA 2018 *Transit Noise and Vibration Impact Assessment* guidance. The Cerritos College Campus is approximately 3,000 feet to the northeast of the project alignment and is outside the area of potential noise effects.
CC-8-95	Additional detail regarding how soundwalls work has been added to the Section 1.6.1.15 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR). Noise barriers can be made of any outdoor weather-resistant solid material that meets the minimum sound transmission loss required by the Project. Materials that are commonly used for noise barriers include 16-gauge steel, 1-inch-thick plywood, and any reasonable thickness of concrete. Metro noise barriers are typically constructed of masonry block walls, solid plastic panels, or a combination of the two depending on design considerations. The final material is not available at this time and will be considered during final design.
CC-8-96	The noise analysis follows the Detailed Noise Analysis Procedure per the 2018 FTA *Transit Noise and Vibration Impact Assessment Manual*. The Detailed Noise Analysis Procedure considers LRT sources of noise (e.g., LRT pass-by noise, TPSS noise, special trackwork, and crossing signals) and mitigation measures such as soundwalls. Neither the procedure nor the FTA Manual as a whole includes methodology related to implementing a correction for reflected noise. The assessment of soundwall effectiveness takes into consideration the height of the receptors, height of the soundwalls, and the distance of the receptor from the source and soundwall. The noise analysis was reviewed by FTA and found to be consistent with the analysis procedures to assess transit noise. The FTA Detailed Noise Analysis Procedure includes a built-in assumption for reflection that occurs as a result of different surfaces the soundwaves travel across, including noise barriers. The barrier noise reduction calculation was completed using the non-absorptive (reflective) formula, which considers the reflective properties of noise barriers.
CC-8-97	See responses to comments CC-8-42 and CC-8-45 regarding mitigation measures, including insulation.

Comment ID	Response
CC-8-98	The noise analysis was reviewed by FTA and found to be consistent with the analysis procedures to assess transit noise. See Common Response CR-NOI-1 regarding guidance used for noise impacts analysis. Substantial cut-through traffic in residential streets is not anticipated in the vicinity of the at-grade crossings located in the City of Cerritos. Residential streets are primarily oriented north-south and do not have through access to major arterials that would prompt cut-through traffic to avoid at-grade crossings. Traffic will still have unobstructed access to Gridley Road as the primary north-south arterial road and 183rd Street as the primary west-east arterial. The alignment will be elevated at 183rd Street and Gridley Road and will not inhibit traffic flow. Vibration caused by rubber-tired vehicles, particularly light passenger vehicles, is limited, not typically felt outside the road right-of-way, and would be no greater than experienced with existing traffic. Noise associated with the parking structure was evaluated in the Draft EIS/EIR. Specifically, Chapter 4, Sections 4.7.3.2 through 4.7.3.5 of the Draft EIS/EIR concluded that adverse effects related to parking facility noise will not occur. Table 5.7 in Chapter 5 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (Appendix M of the Draft EIS/EIR) provides the results of the noise analysis for parking facilities, including parking at the Pioneer Station. No adverse noise effects will occur related to parking facilities. Refer to the response to comment CC-8-82 regarding Project Measure TR PM-10 (Pioneer Station Access). Corby Avenue will serve as a secondary entrance/exit point as required, limiting vehicle access to/from adjacent residential streets. Pioneer Boulevard is a major street with high existing traffic volumes, and station traffic will not result in a doubling of traffic volumes that could potentially increase traffic noise levels. Per request from the CPUC since circulation of the Draft EIS/EIR, Corby Avenue has been redesigned as a cul-de-sac configuration, limiting traffic access to the Pioneer Station parking structure from residential streets.
CC-8-99	See response to comment CC-8-44. The detailed noise analysis procedure outlined in the FTA *Transit Noise and Vibration Impact Assessment Manual* does not recommend presentation of noise contours for noise impacts of LRT projects and instead indicates it is more precise to identify impacts by cluster. The noise analysis includes detailed noise levels at identified sensitive receptors, their potential to experience noise impacts, mitigation reductions, and residual impacts. Existing ambient noise levels were measured at sensitive receptors, which include noise generated by existing roadways.

Comment ID	Response
CC-8-100	8. As discussed in Section 1.5.3.9 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (Appendix M to the Draft EIS/EIR), Metro LRT vehicles are equipped with resilient wheels instead of solid steel wheels, such as those used on freight rail systems. Several different types of resilient wheels are used on light-rail vehicles; the most common resilient wheels have small rubber blocks that separate the wheel tread from the hub, thereby substantially reducing the occurrence and amplitude of wheel squeal. Curves with a radius less than 600 feet could result in generation of wheel squeal by the LRT vehicles. There are no curves within the City of Cerritos that will increase the incidence of wheel squeal. Curves where wheels squeal may occur are noted in the table included in Mitigation Measure NOI-3 in Section 4.7.4 of the Final EIS/EIR. 9. Additional detail regarding low-impact frogs and ballast mats was added to Section 4.7.4.2 of the Final EIS/EIR. Rail switches (where two sets of track connect) generate increased noise and vibration levels when trains cross over the gaps between the tracks, creating a "clickity-clack" sound. Low-impact frogs are crossovers with a spring-loaded or moveable mechanism that closes the gap between rails at the crossover thereby reducing the noise and vibrations caused by trains passing over gaps in the rails. A ballast mat consists of a rubber or other type of elastomer pad that is placed under the ballast, providing a cushioning layer that helps isolate the track structure from the ground below. Ballast mats are typically made from materials with damping properties, meaning they can absorb and dissipate the vibration energy generated by the passage of trains, thereby reducing the magnitude of vibrations that travel through the ground.
CC-8-101	10 and 11. Instances of "would" have been updated to "will" for mitigation measures in the Final EIS/EIR and corresponding technical reports. The Draft EIS/EIR used conditional wording (i.e., "would") because there were multiple alignments under consideration and a mitigation measure may not apply to the alternative that advances as the LPA.
CC-8-102	Refer to the responses to comments CC-8-31 and CC-8-32 regarding privacy. By providing soundwalls and/or the combination of soundwalls and vertical screening element that are at least 8 feet tall, views from the aerial structure into the backyards adjacent of residential properties will be limited. A proposed view of the LPA at Gridley Road (Figure 4.4-9), including the soundwalls, has been added to Section 4.4.3.2 of the Final EIS/EIR. Additionally, in coordination with the City of Cerritos, the proposed TPSS Site 2 from the northwest side of the intersection of 183rd Street/Gridley Road has been relocated to the southeast side of the intersection within the City of Artesia, as noted in Section 2.4.3.2 of the Final EIS/EIR. One optional TPSS is located at the 183rd Street/Studebaker Road; however, this TPSS would not be located adjacent to residential uses.
CC-8-103	See response to comment CC-8-58. The Project will provide a safe and secure environment for Valley Christian School students and other pedestrians and bicyclists at this intersection. Therefore, no additional analysis or mitigation measures were changed in the Final EIS/EIR.
CC-8-104	Profiles have been lowered at Artesia Boulevard and the private grade crossings. The revised configurations and profiles are included in the LRT Plans (Appendix B) of the Final EIS/EIR on Sheets T-255 and T-256. Complete construction plans and details will be prepared at a later design phase.

Comment ID	Response
CC-8-105	The comment regarding the drawing is acknowledged. Drainage will be designed at a later stage in the Project. As noted in the *West Santa Ana Branch Transit Corridor Project Environmental Study, Sustainability Stormwater Study* (2020), low impact development (LID) stormwater best management practices (BMPs) will be implemented to maintain pre-development flow volumes, peak flow rates, and times of concentration, and would avoid and minimize adverse effects to water quality and water resources.
CC-8-106	See response to comment CC-8-104.
CC-8-107	See response to comment CC-8-105.
CC-8-108	The comment regarding the drawing is acknowledged. In the Final EIS/EIR, the soundwall is proposed as 12 feet in height starting at approximate station 1355+00 to further reduce predicted noise levels.
CC-8-109	See response to comment CC-8-105.
CC-8-110	In the Final EIS/EIR, soundwalls are proposed at 12 feet for the at-grade alignment at this location, 12 feet for part of the retaining wall/aerial segment north of 183rd Street and Gridley Road, and 10 feet when crossing and south of 183rd Street and Gridley Road. The transition would occur at the start of the retaining wall.
CC-8-111	The comment regarding the drawing is acknowledged.
CC-8-112	The comment regarding the drawing is acknowledged.
CC-8-113	The comment regarding the drawing is acknowledged. See responses to prior comments.
CC-8-114	Coordination will be conducted with the U.S. Army Corps of Engineers at this location to determine if the easement is necessary. Metro owns the ROW at this location.
CC-8-115	The comment regarding the drawing is acknowledged.
CC-8-116	Coordination will be conducted with Caltrans at this location to determine if the easement is necessary. Metro owns the ROW at this location.
CC-8-117	The comment regarding the drawing is acknowledged.
CC-8-118	The comment regarding the drawing is acknowledged.
CC-8-119	The comment regarding the drawing is acknowledged.
CC-8-120	The comment summarizing the City's above comments is acknowledged. Please see responses to individual comments in this submission.
CC-8-121	The comment regarding the Draft EIS/EIR is acknowledged. Individual responses to the City's comments on the Draft EIS/EIR are provided below.

Comment ID	Response
CC-8-122	The Draft EIS/EIR includes a sufficient degree of analysis to allow for meaningful and informed public participation and to provide decision-makers with information that enables them to make a decision that intelligently takes into account the environmental consequences of the alternatives evaluated (See State CEQA Guidelines, § 15151). As provided by the CEQA Guidelines, the adequacy of an environmental document is determined in terms of what is reasonable and feasible, in light of such factors as the magnitude of the project at issue, the severity of its likely environmental impact, and the geographic scope of the project (State CEQA Guideline, § 15204[a])). For a linear project that spans approximately 6.6 miles (Alternative 4) to approximately 19.3 miles (Alternative 1), and traverses through or is directly adjacent to 12 cities, and one unincorporated community, what is reasonable and feasible is different than what could be reasonably accomplished for smaller projects with relatively simple analyses. The Draft EIS/EIR includes thorough information about the Purpose and Need of the Project, the construction and operational components of each of the Build Alternatives, applicable regulations regarding the various resource topics addressed, the analytic methodology employed for each topic, the existing environmental setting, the environmental consequences and impacts of the Build Alternatives, and regulatory requirements, project commitments, and mitigation measures with which the Project shall comply and that will ensure environmental impacts are minimized. The Draft EIS/EIR also includes appropriate graphics, tables, and figures to help convey the technical detail in a manner that is comprehensible for a layperson. To avoid unnecessary repetition, the Draft EIS/EIR's CEQA sections rely on and reference information presented earlier in each section that was originally presented in support of the NEPA analysis. The analyses are also based on the more detailed technical studies, which are referenced at the beginning of each Draft EIS/EIR section and included as appendices to the Draft EIS/EIR. Although the comment asserts that the Draft EIS/EIR does not adequately address the potential environmental effects of the Project, the comment does not provide an example of any potential environmental impact that the commenter believes has been insufficiently addressed. As provided in the CEQA Guidelines, comments on a draft EIR should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (State CEQA Guidelines, § 15204[a]). Responses to the specific concerns raised by the commenter are provided in the responses below.
CC-8-123	When a draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review period for a draft EIR is 45 days. (Pub. Resources Code, § 21091[a]; State CEQA Guidelines, § 15105[a]). Consistent with this requirement, the public review period on the Draft EIS/EIR was initially 45 days. A lead agency may, but need not to, extend the public review period (State CEQA Guidelines, § 15015[a].) However, the public review period on a draft EIR should not be longer than 60 days "except in unusual circumstances" (*ibid*). Although not required, at the request of public and agency commenters, Metro and FTA extended the review period on the Draft EIS/EIR to 60 days. There were also four public hearings and four open discussion meetings during this period.
CC-8-124	Refer to CR-GEN-3 and response to comment CC-8-11. The Project originally proposed an at-grade station and alignment at 183rd Street/Gridley Road. During the scoping process, however, the City of Cerritos voiced opposition to any station or at-grade alignment within the City. Based on the feedback submitted, Metro removed the 183rd Street/Gridley Road Station from further consideration and the alignment was changed from at-grade to aerial over the 183rd/Gridley intersection. However, the alignment has been designed to accommodate a potential station if one is identified in the future.

Comment ID	Response
	The statement in the comment that the "cure is worse than the disease it addresses," is taken to mean that the change from an at-grade alignment to an aerial alignment at the 183rd Street/Gridley Road intersection increased, rather than decreased, the potential for adverse environmental impacts relative to an at-grade alignment. This assumption is incorrect. Contrary to the commenter's suggestion, the grade-separated crossing at 183rd Street/Gridley Road will not interfere with traffic circulation because the alignment will be separate from traffic, compared to conditions with an at-grade crossing where traffic would be affected when gates are down as a train travels through the crossing. The comment provides no evidence that the aerial alignment at this location would interfere with the retail businesses identified in the comment. The proposed aerial alignment would not reduce parking spaces or accessibility to adjacent and nearby land uses. The entrances to Los Cerritos Center, the Plaza 183 open shopping mall, and the Cerritos Auto Center are not located at the 183rd Street/Gridley Road intersection, but at least one city block away (in the cases of Los Cerritos Center and the Plaza 183 mall) and almost a mile away (for the Cerritos Auto Center, which is also accessible by the South Street offramp of Interstate 605). The LRT bridge would not affect the ability of drivers, bicyclists, or pedestrians to access these retail centers. As discussed in Section 4.17, Economic and Fiscal Impacts, of the Draft EIS/EIR, the Project would not have adverse effects related to local tax bases. It should also be noted that under CEQA, economic and social impacts, as well as automobile delay impacts, are not considered environmental impacts (CEQA Guidelines, §§ 15131(a), 15064.3(a). Regarding operational noise impacts, the Draft EIS/EIR discloses that, even with implementation of mitigation measures, the Build Alternatives would have a moderate and severe noise impacts to residential land uses within the City of Cerritos (see Draft EIS/EIR, Figure 4.7-11 – LRT Noise Impacts Remaining After Mitigation, including Soundwalls (City of Cerritos to City of Artesia). Additional analysis was prepared for the Final EIS/EIR which resulted in increased wall heights starting at 12 feet for the at-grade alignment at this location, 12 feet for part of the retaining wall/aerial segment north of 183rd Street and Gridley Road, and 10 feet when crossing and south of 183rd Street and Gridley Road. In the Draft EIS/EIR, two moderate impacts and six severe impacts remained after implementation of mitigation in the City of Cerritos. After additional analysis prepared for the Final EIS/EIR, five moderate impacts and no severe impacts will remain in the City of Cerritos. There are no additional feasible mitigation measures or alternatives that would reduce this impact to less than significant, and the impact is significant and unavoidable. For Metro to proceed with the Project, the Metro Board of Directors would need to find that the specific economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, and the adverse environmental effects may be considered "acceptable" and the agency may approve the project (CEQA Guidelines, § 15093(a)). To the extent the comment is suggesting that the vertical alignment should be belowground at the 183rd Street/Gridley Road intersection, please refer to CR-GEN-3. Chapter 2 of the Draft EIS/EIR included text explaining the impacts associated with an underground alignment and that it was eliminated as an alternative; however, after circulation of the Draft EIS/EIR, this design concept was reevaluated as part of the Cut-and-Cover Study mentioned in response CR-GEN-3. As explained therein, a belowground alignment at the 183rd Street/Gridley Road intersection is infeasible, largely due to exorbitant costs (a belowground alignment at this intersection would increase the cost of the Project by approximately $294 million ($2022) or $459 million ($2035). There is already a significant funding gap for the LPA, a shortage that has been made more difficult by the State of California's January 31, 2023, denial of Metro's request for $500 million of state funds for the Project. Metro is actively pursuing potential avenues of funding for the LPA, including federal funding. It is unclear whether Metro will

Comment ID	Response
	obtain the funding necessary to construct the LPA and increasing the cost of the LPA by nearly $300 million ($2022) is not feasible.
CC-8-125	Refer to responses to comments CC-8-123 and CC-8-124.
CC-8-126	See response CR-GEN-3 and responses to comments CC-8-9 and CC-8-124.
CC-8-127	See response CR-GEN-1 regarding identification of the LPA. The environmentally superior alternative was identified in Chapter 6, Section 6.4 of the Draft EIS/EIR. As stated in Section 6.4.6, "while each of the Build Alternatives would result in varying levels of impacts and benefits, Alternative 3 would have an overall environmental advantage compared to the other Build Alternatives. Alternative 3 would have fewer permanent acquisitions, business displacements, noise and vibration impacts, and be in proximity to fewer hazardous materials sites compared to Alternatives 1 and 2. Construction of Alternative 3 would affect access to fewer community facilities, require fewer construction laydown areas, and would not result in exceedances in daily regional emissions compared to Alternatives 1 and 2. Due to the lack of connectivity and limited benefits achieved with four stations, Alternative 4 would provide a lower level of environmental benefits to the region when compared to the other Build Alternatives. Overall, Alternative 3 would generate environmental benefits by providing mobility and connectivity to transit-dependent populations in 12 cities throughout the corridor, as well as $5.1 million in economic activity annually to the region. As such, Alternative 3 is identified as the environmentally superior alternative pursuant to CEQA requirements."
CC-8-128	The LPA's grade crossings will require six permanent partial acquisitions within the City of Cerritos. These six permanent partial acquisitions will permanently affect approximately 1,100 square feet across five parcels in the City of Cerritos. Construction of the LPA will require eight temporary construction easements, temporarily affecting approximately, 2,000 square feet across approximately five parcels in the City of Cerritos. None of the affected parcels (permanent or temporary) contains residential uses. Further, permanent and construction activities would not displace any businesses or residential uses within the City of Cerritos. As concluded in Sections 4.3.3 and 4.19.3.3 of the Final EIS/EIR, the LPA will not result in adverse effects related to acquisitions and displacements. A new discussion on potential impacts to sales tax revenues has been added to Chapter 4, Section 4.17.3.2 (Economic and Fiscal Impacts) under the heading "Impacts on Local Tax Bases." As stated therein: Sales taxes provide revenues to the general fund for all cities in the Affected Area for economics. The LPA will impact local businesses as local traffic patterns change, patronage to new stations is introduced, and the off-street and on-street parking along the LPA changes. Some businesses may experience a loss in revenue if potential customers are discouraged from patronizing the businesses because of both real and perceived inconvenience factors, such as roadway modifications or delays associated with at-grade crossings. However, motorists will likely adapt to the changes in traffic circulation, and transit riders may frequent businesses near the station, reducing overall impacts on retail sales to negligible levels. Businesses that are destination trips, such as shopping centers or automobile sales, make them more resilient to changes in the roadway network. Some factors may also positively affect business revenues, including increased exposure to customers in and around the station area, higher visibility along the light rail alignment, or changes to local and global economic conditions. The LPA will also result in additional access to businesses along the corridor to customers who do not drive, providing a source of increases retails sales during operations.

Comment ID	Response
CC-8-129	See response CR-GEN-1 regarding identification of the LPA.
CC-8-130	See responses to comments CC-8-122 and CC-8-123. The Draft EIS/EIR provides agencies and the public with detailed information about the potential effects of the Project on the environment. The Draft EIS/EIR includes appropriate graphics, tables, and figures to help convey the technical detail in a manner that is comprehensible for a layperson. To avoid unnecessary repetition, the Draft EIS/EIR's CEQA sections rely on and reference information presented earlier in each section that was originally presented in support of the NEPA analysis. The analyses are also based on the more detailed technical studies, which are referenced at the beginning of each Draft EIS/EIR section and included as appendices to the Draft EIS/EIR.
CC-8-131	Table 4-7.7 in Chapter 4, Section 4.7.4.1 of the Draft EIS/EIR identifies unmitigated and mitigated noise levels and identifies if impacts remain after mitigation. The direct effect of mitigation is shown in the table. For example, Cluster N71 was predicted to have an unmitigated noise level of 60 dBA L_{dn} and a mitigated noise level of 52 dBA L_{dn}. The noise level reduction associated with mitigation that was calculated for Cluster N71 was 8 dBA, L_{dn}. The table also includes the mitigation measures that have been applied, in this case Mitigation Measure NOI-1 Soundwalls. Detailed descriptions of mitigation measures are included in Section 4.7.4 of the Draft EIS/EIR. The information has been updated for the Final EIS/EIR and is presented in Chapter 4, Sections 4.7.3.2 and 4.7.4. See also responses to comments CC-8-42, CC-8-45, CC-8-47, and CC-8-48.
CC-8-132	See response to comment CC-8-51.
CC-8-133	There will not be a "yard" at the end of the WSAB alignment in the Cities of Cerritos or Artesia. Tail tracks are proposed at the terminus of the alignment at the Pioneer Station. The footnote in Section 2.5.2.2 of the Draft EIS/EIR explained the use of tail tracks as additional track that extend beyond the end of the mainline tracks and can be used for temporarily parking, storing, or reversing the direction of trains. While the tracks are designed to allow for layover if needed, trains would not sit at the end of the line. The tail tracks would be used for trains to turn around and reach the other side of the tracks to make the return trip in the other direction. To provide a conservative analysis, tail tracks were analyzed as part of the evaluation of the Pioneer Station, with an assumption of a gate down time of 45 seconds, a value that is consistent with the other terminus station locations in the Metro Rail system. However, typical train operations at the Pioneer Station will utilize the front-end cross over north of the station platform to change train directions. The usage of the back-end crossovers and tail track provides operational flexibility in the event of a service disruption or special service, and is not regularly employed during normal operations.
CC-8-134	Refer to response to comment CC 8-17.
CC-8-135	Metro received the attached maps of the Cerritos bikeway and Cerritos Center.

City of Cudahy (Sal Lopez)

From: Sal Lopez <slopez@cityofcudahyca.gov>
Sent: Wednesday, September 29, 2021 10:06 AM
To: Khanna, Meghna <KhannaM@metro.net>
Subject: City of Cudahy Comment Letter for WSAB EIR/EIS

Good afternoon, Meghna

Please find attached the City of Cudahy's comments on the WSAB EIR/EIS for review and consideration. We look forward to working with Metro on this very exciting and important project.

Please feel free to reach me directly if you have any questions.

CC-1-1

Thank you,

Sal Lopez
Interim Community Development Manager
(323) 773-5143 ext. 242
(626) 831-1133 (mobile)

CITY OF **CUDAHY** CALIFORNIA

Incorporated November 10, 1960

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

Re: Comments West Santa Ana Branch Transit Corridor Draft Environmental Impact Report/Statement

Ms. Khanna,

The City of Cudahy has reviewed the West Santa Ana Branch (WSAB) Transit Corridor Draft Environmental Impact Report/Statement and supports Alternative 1 (Los Angeles Union Station to Pioneer Station) and Design Option 2 (Addition of Little Tokyo Station). The City of Cudahy along with other cities in the WSAB corridor strongly believes that by working together with the Los Angeles County Metropolitan Transportation Authority (Metro) and our state and federal elected representatives, we can obtain funding to build this line in an equitable, sustainable, and responsible manner. Our communities were some of the strongest supporters of Measures R and M transportation sales tax measures that are being used by Metro to fund the WSAB light rail project and it is time for us to benefit from the local sales tax measure. CC-1-2

As much as we support the project, our cities - especially after COVID-19's impact on local brick and mortar retail businesses and the subsequent loss of sales tax revenue - do not have the financial means to provide the 3% local match within the required 5-year period. We ask that Metro work with us to reduce the amount of local contribution and on identifying alternative non-city general fund revenue that can be utilized to satisfy this requirement. Additionally, we request that the existing 5-year time frame be extended and that the cities located in southeast Los Angeles only be required to pay its fair share of the 3% local contribution for the operating from Artesia to Slauson that directly benefits the Gateway Cities region. Eliminating the local 3% contribution costs associated with the improvements located in the City of Los Angeles is justified, fair and equitable. CC-1-3

As a region comprised of Environmental Justice Communities that are adversely impacted by environmental and socioeconomic factors affecting the health, environment and quality of life of local residents on a regular basis, we expect to be treated fairly and given the same consideration as past Metro projects serving other more affluent areas of Los Angeles County. As a Justice40 project, under the President Biden administration, we recognize the importance and opportunity of moving forward quickly together. However, the Draft WSAB EIR/EIS does not sufficiently address the environmental impacts created by the construction and operation of the transit line and protect the sensitive land uses; CC-1-4

minimize the impacts to traffic and parking; plan safety and security systems; protect our residential neighborhoods, industrial and business districts; minimize sound, vibration and particulate matter for all sensitive land use receptors, recognize the importance of the interdependence of communities and the impacts to taking a yard, a tree, a home, a business.

CC-1-4

Each city both shares similar impacts and has ones that are unique to them. Eco-Rapid Transit is outlining the major impacts that need mitigation. For us, these additional impacts are critical. Additionally, we have provided comments below addressing focused review of environmental impacts.

We look forward to working with Metro to create a state of the art, sustainable transit corridor and to develop and implement an environmental mitigation program that addresses the impacts to our city.

CC-1-5

Sincerely,

Salvador Lopez Jr.
Interim Community Development Manager

This memo provides comments regarding the WSAB Environmental Impact Statement/Environmental Impact Report (EIS/EIR). We have focused our review on environmental justice, transportation, noise and vibration, aesthetics and visual impacts (including the project's appearance on aerial alignments, sound walls, and lighting). Our comments regarding noise and vibration impact analysis are limited by lack of direct expertise in acoustical engineering; however, we have added comments highlighting deficiencies in the EIS/EIR analysis regarding whether the EIS/EIR adequately mitigates impacts with respect to City of Cudahy residential neighborhoods along the alignment. CC-1-6

A. General Comments/Environmental Justice

1. The City of Cudahy has reviewed the West Santa Ana Branch (WSAB) Transit Corridor Draft Environmental Impact Report/Statement and supports **Alternative 1** (Los Angeles Union Station to Pioneer Station) and **Design Option 2** (Addition of Little Tokyo Station). **Implementing a single-seat LRT trip to Union Station is a critical environmental justice issue for Cudahy residents**. Alternative 3 would require two transfers to access Union Station and will disadvantage residents who are already burdened by a lack of efficient transit to downtown Los Angeles and the greater Los Angeles region. Multiple transfers may already be required for most Cudahy residents to access the WSAB line – why add more, and create disincentives to ride transit? CC-1-7 CC-1-8
2. The City of Cudahy along with other cities in the WSAB corridor strongly believes that by working together with the Los Angeles County Metropolitan Transportation Authority (Metro) and our state and federal elected representatives, we can obtain funding to build Alternative 1 in an equitable, sustainable, and responsible manner. Our communities were some of the strongest supporters of Measures R and M transportation sales tax measures that are being used by Metro to fund the WSAB light rail project and it is time for us to benefit from the local sales tax measure. CC-1-9
3. As much as we support the project, the city of Cudahy as well as the other cities along the WSAB corridor - especially after COVID-19's impact on local brick- and-mortar retail businesses and the subsequent loss of sales tax revenue - do not have the financial means to provide the 3% local match within the required 5-year period. We ask that Metro work with us to reduce the amount of local contribution and on identifying alternative non-city general fund revenue that can be utilized to satisfy this requirement. Additionally, we request that the existing 5-year time frame be extended and that the cities located in southeast Los Angeles only be required to pay their fair share of the 3% local contribution for the operations from Artesia to Slauson that directly benefit the Gateway Cities region. Eliminating the local 3% contribution costs associated with the improvements located in the City of Los Angeles is justified, fair and equitable. CC-1-10
4. As an Environmental Justice community that is adversely impacted by environmental and socioeconomic factors affecting the health, environment and quality of life of local residents on a regular basis, we expect to be treated fairly and given the same consideration as past Metro projects serving other more affluent areas of Los Angeles County. The Draft WSAB EIR/EIS does not sufficiently address the environmental impacts created by the construction and operation of the transit line, does not protect sensitive CC-1-11

land uses, does not minimize the impacts to traffic and parking, does not plan safety and security systems, does not protect our residential neighborhoods, industrial and business districts, does not minimize sound, vibration and particulate matter for all sensitive land use receptors, does not recognize the importance of the interdependence of communities, and does not thoroughly address the impacts of taking all or part of residential yards, or trees, homes, or businesses. CC-1-11

5. The City of Cudahy concurs with all issues raised by the Board of Eco-Rapid Transit, a.k.a. the Orange Line Development Authority, regarding the WSAB Draft EIS/EIR. CC-1-12

B. Transportation/Traffic Engineering Comments

1. General Comments

a. Section 9, References. Several items directly related to the West Santa Ana Branch analysis by Los Angeles County Metropolitan Transportation Authority (Metro) do not provide hyperlinks to easily cross reference. For example, first reference on page 9-3, Corridors Base Model 2018 Calibration and Validation Report, does not provide a hyperlink to the document. CC-1-13

b. The EIS/EIR and appendices fail to show the Synchro analysis data. There are no analysis sheets provided that detail the HCM/Synchro model analysis of the study intersections. The City is unable to determine if the Synchro analysis is correct without reviewing the analysis sheets. Please provide all Synchro analysis sheets, including the Synchro input files, for the City's review. CC-1-14

c. Blank pages. There are pages that appear to be left blank intentionally. Please identify these pages appropriately (for example, see Page A6-2). CC-1-15

d. Headways. Tables showing Headways do not clarify that headways are in minutes (for example, see Table 5.17). CC-1-16

2. Appendix D - Transportation Impact Analysis Report

a. Page 1-6, last paragraph – The paragraph begins with "Figure 1-2". This is the wrong reference. Should this be Figure 1-1? CC-1-17

b. Section 1.5.1, Analysis Approach: Traffic Operations (Page 1-7) – What are the default value inputs used for coding the HCM/Synchro model analysis? Program default values may not represent study locations and should be adjusted to simulate actual field conditions. Section 9 References do not appear to include any analysis detail reports/studies. CC-1-18

c. Section 1.5.10, Applying LOS for Impact Assessment (Page 1-14) – How did the HCM/Synchro software simulate a rail crossing operation? It is our understanding that Synchro has limited ability to properly simulate a train crossing event. The main concern in using the Synchro software is that the schedule of events (an event is a train crossing and activating the gate) cannot be set and controlled in the model. So, even though headways of the trains are known, that information cannot be inputted into the model. The model generates vehicles randomly and as a result, a fixed set of assumptions and known conditions could generate different output results in separate runs. How many Synchro analysis runs were conducted to determine the delay and 95% vehicular queue for the study intersections? CC-1-19

d. Figure 2-2. Project Alignment by Alignment Type (Page 2-4) – The line definitions/legends for the "At-Grade, Aerial, and Underground" call outs are difficult to determine because of the scale of the map. Unless the reader translates line-by-line the details found on pages 2-12 to 2-14, the different line types are not distinguishable. How can this Figure be improved to clearly identify the proposed track position? CC-1-20

e. Table 4.46. On-Street Parking Conditions: Proposed Locations (Page 4-50) – Parking demand observations were made in 2017. Based on these observations near the Florence/Salt Lake station, the parking demand was 30%. Additional details on the observed parking can be found in Table 4.62 (excerpt below). CC-1-21

Station	Parking Survey Area [a] (acres)	Applicable Alternative(s)	Existing On-Street Parking Spaces	Observed Field Utilization
Florence/Salt Lake	108.0	1, 2, 3	1,106	30%

f. Table 5.4. 2042 Build Alternative 2 Operations (Page 5-9) – This table identifies the delay (seconds) and Level of Service (LOS) for Alternative 2. The traffic impacts of Alternative 3 (Staff Preferred Alternative) "would be equal to or less than those at the same facilities for Alternative 2" (page 5-16, Section 5.1.4, Alternative 3: Slauson/A (Blue) Line to Pioneer Station). The impacts for the City of Cudahy (pages 5-11 and 5-12) are shown in the excerpt below. CC-1-22

This Table indicates that 5 intersections in the City of Cudahy will be not significantly impacted by the WSAB project. The delay at intersection nos. 56, 57, and 59 are less than the No Build alternative.

As previously stated, there are no analysis sheets provided that detail the HCM/Synchro model analysis of the study intersections. We are unable to determine if the analysis

methodology and inputs are appropriate. Provide all Synchro analysis sheets, including the Synchro input files, for the City's review. CC-1-22

No	Intersection Name	Jurisdiction	No Build Peak Hour Delay/LOS[a]	Alternative 2 Peak Hour Delay/LOS[b]
56	Otis Ave/Salt Lake Ave (East)	Cudahy	83/F-AM 104/F-PM	36/E-AM 93/F-PM
57	Otis Ave/Elizabeth St	Cudahy	1452/F-AM 1473/F-PM	342/F-AM 366/F-PM
59	Santa Ana St/Salt Lake Ave (East)	Cudahy	219/F-AM 265/F-PM	146/F-AM 100/F-PM
60	Ardine St/Salt Lake Ave	Cudahy	24/C-AM 20/C-PM	25/D-AM 16/C-PM
61	Atlantic Ave/Salt Lake Ave	Cudahy	51/D-AM 81/F-PM	53/D-AM 81/F-PM

g. Table 5.5. 2042 Build Alternative 2 - 95th Percentile Queues from Upstream Crossing to Intersection (Page 5-14) – This table, also excerpted below, indicates queue lengths can be accommodated at locations within the City. The City has several questions and comments regarding the intersections identified in the table. CC-1-23

i. Will the southbound queue on Otis Ave block access to the intersection of Otis Ave/Elizabeth St? If so, what mitigation measures will be implemented to address this blockage?

Crossing[a, b]	Intersection to the North/East of Train Crossing	Distance from Intersection Back to Rail Crossing (feet)	Build Alternatives 95th Percentile Queue[c] (feet)	Intersection to the South/West of Train Crossing	Distance from Intersection Back to Rail Crossing (feet)	Build Alternatives 95th Percentile Queue[c] (feet)
Otis	Otis Ave/ Salt Lake Ave (East)	Intersection operations coordinated with the adjacent crossing		Otis Ave/ Salt Lake Ave (West)	Intersection operations coordinated with the adjacent crossing[e]	
Santa Ana	Santa Ana St/ Salt Lake Ave (East)	Intersection operations coordinated with the adjacent crossing		Santa Ana St/ Salt Lake Ave (West)	Intersection operations coordinated with the adjacent crossing	
Ardine[f]	Ardine St/ Salt Lake Ave	Intersection operations coordinated with the adjacent crossing		N/A	N/A	

ii. Otis Ave/Salt Lake Ave (East) and Otis Ave/Elizabeth St are both all-way Stop controlled intersections. How will "Intersection operations coordinated with CC-1-24

adjacent crossing" be accomplished? Based on the physical distance of these 2 intersections to the Rail Crossing, both intersections should become fully signalized intersections with the Rail Crossing. The signal operation of Otis Ave/Salt Lake Ave (East) and Otis Ave/Elizabeth St should be coordinated with the use of a single traffic controller for both intersections. CC-1-24

iii. The Otis Ave/Salt Lake Ave (West) intersection is also an all-way Stop controlled intersection. How will "Intersection operations coordinated with adjacent crossing" be accomplished? Due to the Otis Ave/Salt Lake Ave (West) intersection located directly adjacent to the Rail Crossing, this intersection should become fully signalized with the Rail Crossing. CC-1-25

iv. Overall, the Rail Crossing at Otis Ave has 3 Stop controlled intersections very close to one another and the Rail Crossing. The 3 intersections should be signalized and be closely coordinated to ensure traffic flow over the Rail Crossing is minimally impacted. CC-1-26

v. Santa Ana St/Salt Lake Ave (East) is immediately adjacent to the Rail Crossing. Based on this physical distance, this intersection should become fully signalized with the Rail Crossing. CC-1-27

vi. Santa Ana St/Salt Lake Ave (West) is immediately adjacent to the Rail Crossing. There is also a spur line that is west of the WSAB rail line. Based on the 2 rail lines and the physical distance between the intersection and the Rail Crossing, this intersection should become fully signalized with the Rail Crossing. CC-1-28

h. Table 5.53. On-Street Parking Impacts (Page 5-63) – This Table, excerpted below, summarizes the on-street parking impacts of each Alternative. The Florence/Salt Lake Station discussion indicates that Alternatives 1, 2, and 3 would have no impact ("No change") to on-street parking in the City of Cudahy. The City does not concur with this conclusion. CC-1-29

Location	Jurisdiction	Existing On-Street Parking Spaces	Observed Field Utilization[a]	Parking Spaces Added/ Removed[b]	Alternative(s) Affected	Description of Effect
Florence/Salt Lake Station	Huntington Park	1,106	30%	0	1, 2, 3	No change.

On-street parking is generally in high demand in residential neighborhoods throughout the City. The proposed mitigation measures (TRA-21: Parking Monitoring and Community Outreach, and TRA-22: Parking Mitigation Program (Permanent)) may be helpful but even the Report states (Page 5-62) "it is possible that adverse effects would remain after mitigation." The WASB project must address the loss of any on-street parking to the satisfaction of the City and its residents, including spillover impacts. CC-1-29

i. Table 5.54. Off-Street Parking Impacts (Page 5-65) – These off-street parking impacts are adjacent to the City of Cudahy but primarily in Huntington Park. How will this loss of parking be mitigated? CC-1-30

Location	Jurisdiction	Project Element	Alternative(s) Affected	Number of Lost Spaces	Approximate % of Total Parking	Remaining Spaces Within Code Requirements?
Strip mall on the northeast corner of Walnut Street and California Avenue	Huntington Park	TPSS Site 13(E)	1, 2, 3	13	30%	yes

j. Spillover Parking Impacts (Page 5-68) – This section discusses the Florence/Salt Lake station in the following paragraph:

"On-street parking around the Pacific/Randolph, Florence/Salt Lake, and Gardendale Stations is largely time unlimited and was 60 percent or less utilized at the time of surveys. While it is not anticipated that transit passengers would access these stations via car because dedicated parking is not provided, on-street parking capacity is available to accommodate those who may try to do so without passengers displacing others using the spaces. Therefore, adverse effects from spillover parking would not occur."

The City disagrees with this statement. As stated previously, on-street parking in the City of Cudahy is in high demand especially in residential neighborhoods. Without dedicated parking for the Florence/Salt Lake Station, many rail passengers will likely be seeking parking in the surrounding neighborhoods, particularly because connecting transit is very limited in these neighborhoods. The proposed mitigation measures (TRA-21: Parking Monitoring and Community Outreach, and TRA-22: Parking Mitigation Program (Permanent)) must be applied to the Florence/Salt Lake Station especially with no on-site parking proposed. The WASB project must address the loss of any on-street parking to the satisfaction of the City and its residents. CC-1-31

k. Section 7.3.2.2 Traffic Operations Effects (Page 7-25) – The construction impacts to the City are not clearly identified. This section describes general impacts to traffic circulation. Mitigation measure TRA-20, Transportation Management Plan (TMP) "will address construction impacts on transportation facilities under the jurisdiction of all involved cities and agencies, including Caltrans." We are requesting the EIS/EIR and the Transportation Impact Report indicate the timing of construction for those project elements located in the City of Cudahy. CC-1-32

C. Noise and Vibration

1. Page 4.248 of the DEIS/DEIR refers to "clusters" of sensitive land uses and lists impacts and mitigated impacts in Tables 4.7.7 through 4.7.10, but until Figures 4.7-5 through 4.7-11 there is no *mention* of where these clusters are. The document should alert the reader that the clusters are shown graphically in the respective Figures. Tables 4.7.7 – 4.7.10 should include a column labeled "City" adjacent to the column labeled "Cluster No." Figures 4.7-5 through 4.7-11 should also show boundaries for all cities and unincorporated areas along the route. CC-1-33
2. Clusters No. N129, N130, N131, N136, N137, N138, N139, N140, N144, N145, N152, N153, N164, N165, N166, and N168 are within the City of Cudahy. Table 4.7.7 does not list impacts for N129, N130, N131, N136, N138, N139, N145, and N152. Nothing in the text indicates why these clusters were left out. Impacts to these receptors should be identified and if required, mitigated. CC-1-34
3. Efficacy of sound walls should be described within the EIS/EIR. Tables 4.7-4.7.10 show reductions in dBA and resulting levels of impact, but the text does not describe how sound walls work to accomplish impact reduction, and there are no graphics that show how sound is attenuated by walls of particular heights and distance from the source or receptor. Sound wall materials are not described. Moreover, Appendix M does not show sound-attenuation diagrams, nor does it describe how either surface-mounted or aerial sound walls work to mitigate impacts. The City requests that this information be included in the EIS/EIR itself, not simply by reference to Appendix M. CC-1-35
4. Sound walls may also reflect sound to other receptors. Has this been considered? Reflected sound potential must be identified and mitigated. CC-1-36
5. There are several receptor sites where sound walls have been deemed infeasible (Table 4.7.8). The DEIS/DEIR presents no alternative mitigation measures, such as adding insulation and/or replacing windows of affected structures. Even where sound walls are indicated to be feasible, some remaining impacts are still deemed "severe." Why are no additional mitigation measures suggested? Excessive noise and vibration must be mitigated to protect residents and other sensitive receptors. CC-1-37
6. The DEIS/DEIR does not show noise contours along the projected WSAB route. Why? Noise contours should be illustrated, both for the proposed project and for nearby arterials where that information is available. CC-1-38
7. Are there alternative wheel materials that could be employed to reduce noise? The DEIS/DEIR does not discuss whether alternatives were considered, and if so, why they were rejected. CC-1-39
8. The DEIS/DEIR should describe how the "low-impact frogs" or ballast mats work, and whether there are additional measures that could be used to attenuate vibration where impacts would remain severe. CC-1-40
9. Mitigation Measure NOI-1, Soundwalls, states that "Soundwalls *would* be placed…" (emphasis added). Language like "shall" or "will" instead of "would" gives the reader a greater degree of confidence that the measure will be implemented. The word "would" is not consistent with a mandatory measure. CC-1-41

10. Mitigation Measures NOI-2 through NOI-7 also use "would" instead of "shall." See comment 9. CC-1-41

D. Aesthetics/Visual Impacts

1. Sound walls. Nothing in the EIS/EIR discusses the proposed sound walls' appearance. There are numerous residential properties along Salt Lake Avenue that will face the WSAB tracks and sound walls. Specifically, the view from the public right-of-way as well as from private residential properties on the approximately 2,400' segment of Salt Lake Avenue between Walnut Street and Olive Street would be interrupted by an eight-foot tall wall and views of the residential area west of the tracks would be obscured. While Cudahy acknowledges that protection from excessive noise is necessary, the WSAB project must also avoid creating visual blight. The EIS/EIR dismisses the visual effects of sound walls by stating that they are similar in scale to "surrounding structures" – e.g., houses and other landscape walls and fences along the WSAB corridor (Table 4.4.6, p. 4-150). This is plainly untrue, not only for this segment: residential walls and fences in front yards typically do not exceed four feet in height and do not block views. Table 4.4.6 further states that "viewer sensitivity would be low" and that "viewers would have little to no reaction to the change." What evidence supports this conclusion? CC-1-42

   What measures would be taken to make the sound walls visually pleasing? Figure 4.4-6 provides an illustration of "Proposed Salt Lake Avenue" but does not show an eight-foot tall wall. Instead, the sketch shows a shorter wall topped by fencing, without substantial detail. This is an improper depiction of the proposed wall system. The EIS/EIR should show scaled cross-sections that include residential façades as well as photo-simulations of sound walls so that the true visual impact can be assessed. Moreover, the EIS/EIR should provide examples of sound wall surface finishes and colors. Such finishes must not only be graffiti-resistant but must also be visually attractive using textures and patterns. Opportunities for murals should also be explored.

2. Light and Glare. Table 4.4.6 dismisses the potential for light and glare impacts, in part because sound walls would block train lights. However, the proposed sound wall along the Salt Lake Avenue segment referenced above faces northeast, and could produce glare during early morning hours, particularly during the summer. The EIS/EIR should explain glare caused by WSAB surfaces and provide solutions to mitigate such glare, including surface textures, patterns, and colors. CC-1-43

E. Conclusion

The City of Cudahy strongly requests that Metro address and mitigate the above concerns. Impacts associated with traffic and transportation, noise and vibration, aesthetics, and environmental justice are of critical concern to Cudahy residents. While Cudahy understands that any project such as the proposed WSAB line will *change* the existing environmental baseline, significant adverse changes must be avoided or mitigated as much as possible. CC-1-44

Thank you for the opportunity to review and comment on this important regional project. Please keep the City apprised of all documents, community meetings, and public hearings on the project as it moves forward. CC-1-44

City of Cudahy – CC-1

Comment ID	Response
CC-1-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-1-2	See response CR-GEN-1 regarding identification of the Locally Preferred Alternative (LPA) and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo.
CC-1-3	See response CR-FIN-1.
CC-1-4	Design of the alignment and stations will be consistent with Metro Rail Design Criteria, or equivalent criteria, and Metro's Systemwide Design Standards that are uniformly applied across all Metro lines. See response CR-EJ-1 regarding the approach and guidance used for the Environmental Justice (EJ) analysis and the identification of EJ communities, and response CR-GEN-5 regarding the implementation and recommendation of feasible mitigation measures. The Draft EIS/EIR and its supporting analysis included evaluation of project effects on land uses, traffic and parking, safety and security, neighborhoods and communities, noise, vibration, air quality, and acquisitions of both residential and commercial property. Because each of the listed topic areas was considered in the analysis, and without specificity of what effects are perceived as missing from the analysis, it is not possible to identify what elements the commentor believes to be insufficient. Metro coordinated extensively with the cities, stakeholders, and general public during preparation of the Draft EIS/EIR and Final EIS/EIR. Metro understands the importance of this Project to the Gateway Cities and will continue to coordinate with the cities, stakeholders, and general public throughout the planning process.
CC-1-5	Responses to comments received from Eco Rapid Transit are included in Appendix D of the Final EIS/EIR in the "Improvement Districts and Joint Powers Authorities" grouping of submissions.
CC-1-6	Comments are addressed individually by topic in the responses that follow.
CC-1-7	See response to comment CC-1-2. Metro is dedicated to expanding the regional transit network and providing a project that will establish a reliable transit service and address mobility and access constraints faced by transit-dependent communities and EJ communities. Service to LA Union Station will be provided through transfer to the A Line, which serves LA Union Station.
CC-1-8	See response CR-GEN-1 regarding identification of the LPA. Service to LA Union Station will be provided through a single transfer to the A Line, which serves Union Station.
CC-1-9	The identification of the LPA considered funding availability.
CC-1-10	Refer to response CR-FIN-1.
CC-1-11	Refer to the response to comment CC-1-4.
CC-1-12	Responses to comments received from Eco Rapid Transit are included in Appendix D of the Final EIS/EIR.
CC-1-13	Not all referenced documents are currently available online. Should a reviewing agency require additional supporting information for review, they may contact Metro to obtain copies of digitally available documents.

Comment ID	Response
CC-1-14	Metro provided the SimTraffic output files to the City of Cudahy via email on June 27, 2022. These files have been included as an appendix (Appendix A, Attachment 8) to the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (previously Appendix D to the Draft EIS/EIR).
CC-1-15	Blank pages in the Final EIS/EIR have been updated to note "This page intentionally left blank." No change has been made to the Final EIS/EIR supporting documents.
CC-1-16	Table 5.10 in the *West Santa Ana Branch Transit Corridor Project Transportation Impact Analysis Report* (previously Appendix D to the Draft EIS/EIR) has been revised to note that the headways are shown in minutes.
CC-1-17	The reference to Figure 1-2 in Section 1.5.1 of the *West Santa Ana Branch Transit Corridor Project Transportation Impact Analysis Report* (Appendix D to the Draft EIS/EIR) is correct. The figure includes a photograph of current conditions at the existing Paramount Boulevard/Rosecrans Avenue crossing, which provides an example of one of the common configurations of at-grade crossings illustrated in Figure 1-1.
CC-1-18	Traffic analysis was conducted using Synchro and SimTraffic, the companion simulation tool. Section 1.5.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* has been updated to state that both tools were used. SimTraffic allows for the modeling of at-grade crossings and implicitly considers the coordination effects of adjacent signals. It is a stochastic (random) process to simulate vehicular traffic on the roads, and there are different results with each run. To account for the variations, five SimTraffic runs were conducted, and the average of the results was reported. The Synchro output files include details for the parameters used in the analysis. Synchro default values, which represent common practice, were used in some cases. Consistent values for these input parameters were used to allow for a consistent comparison between intersections in different jurisdictions and in future years where both field conditions and overall traffic conditions (e.g., improved vehicle technology) may change. Specific parameters were: ▪ Saturation flow rate: 1,900 vehicles/hour/lane ▪ Lane width: 12 feet ▪ Grade: 0% ▪ Storage length (for pockets): field-measured or from 10% engineering plans, from the end of the taper length (full width of pocket) to the limit line ▪ Link speed: coded directly based on field speed limit ▪ Peak hour factor: 0.92

Comment ID	Response
CC-1-19	Synchro and SimTraffic are both part of the same software package, but SimTraffic was specifically used to evaluate delay. The combined Synchro/SimTraffic package was used to evaluate the study intersections, using intersection geometry, traffic volumes, train schedules, and signal timing. Synchro was used to code the network (including basic details of geometry, volumes, and timing), but was not used to conduct level-of-service (LOS) analysis. The companion SimTraffic simulation tool was used to assess delay because SimTraffic considers the effects of the at-grade crossings and interactions between intersections (signal timing and queuing). Train schedules were coded into SimTraffic. To allow for a reasonable and accurate representation of the train crossing events for future train operations, a gate down event was coded at each train-crossing location every 2.5 minutes. This approach represents a 5-minute headway for trains in both directions, consistent with the operating plan described in Chapter 2 of the Draft EIS/EIR. The SimTraffic model is stochastic (i.e., has random elements), so five separate simulation runs were conducted for each scenario, and the average of the five runs was used to report results. These procedures are consistent with standard professional practice. Similar analysis methodologies have been applied in Metro's most recent similar environmental study (Metro Gold Line Foothill Extension Phase 2B) and other transit projects.
CC-1-20	Figure 2-4 from the Draft EIS/EIR has been updated for the Final EIS/EIR to depict the LPA and better distinguish at-grade from aerial segments. Please refer to Figure 2.3 in Chapter 2 of the Final EIS/EIR.
CC-1-21	The comment correctly summarizes information from the Draft EIS/EIR.
CC-1-22	See response to comment CC-1-14 regarding SimTraffic output files. Four of the five intersections cited in the comment are currently stop-controlled. As part of Project Measure TR PM-1 (Pre-signals and Queue-cutter Signals), traffic signals are proposed at three intersections (No. 56, 59, and 60). As a result of the signalization, delay will remain similar to the No Build Alternative or be reduced, and LOS will be improved. Intersection No. 57 will remain a stop-controlled intersection, but delay will be improved due to signalization and reduction in delay at nearby intersections (No. 55 and 56).
CC-1-23	The SimTraffic tool considers the effects of queues on adjacent intersections and the results do not show blockage at the Otis Avenue/Elizabeth Street intersection. The Otis Avenue/Elizabeth Street intersection will remain unsignalized with implementation of the LPA. However, the Project will not preclude signalizing this intersection if the City chooses to add a signal in the future.
CC-1-24	As part of Project Measure TR PM-1 (Pre-signals and Queue Cutters), the Otis Avenue intersections on both side of the tracks at Salt Lake Avenue (East) and Salt Lake Avenue (West) will be signalized. Intersection operations to the north, at the Elizabeth Street intersection, will improve with implementation of the LPA, and the intersection will remain unsignalized. There will be coordination between the two new signalized intersections of Otis Avenue at Salt Lake Avenue (East) and Salt Lake Avenue (West) with the use of traffic signal and railroad interconnect cabling. The analysis was documented in Chapter 3, Section 3.4.1.2 of the Draft EIS/EIR and the project measure was described in Section 3.5.1. The Grade Crossing Plan for Otis Avenue (drawing number CS-202) in Appendix B of the Draft and Final EIS/EIR shows the signal design at both intersections. The Project will not preclude signalization at the Otis Avenue/Elizabeth Street intersection if the City chooses to construct a signal in the future.
CC-1-25	See response to comment CC-1-24.

Comment ID	Response
CC-1-26	See response to comment CC-1-24.
CC-1-27	As part of Project Measure TR PM-1 (Pre-signals and Queue-cutter Signals), the Santa Ana Street intersections on both sides of the tracks at Salt Lake Avenue (East) and Salt Lake Avenue (West) will be signalized. There will be coordination between the two (new) signalized intersections at Salt Lake Avenue (East) and Salt Lake Avenue (West) with the typical traffic signal and railroad interconnect cabling. The analysis was documented in the Chapter 3, Section 3.4.1.2 of the Draft EIS/EIR and the project measure was described in Section 3.5.1. The Grade Crossing Plan for Santa Ana Street (drawing number CS-203) in Appendix B of the Draft and Final EIS/EIR shows the signal design at both intersections.
CC-1-28	See the response to comment CC-1-27.
CC-1-29	Implementation of the LPA will require removal of one on-street parking space on Ardine Street. There will be no other permanent loss of on-street parking in the City of Cudahy. Table 5-16 in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* has been updated to include the loss of this parking space. As noted in the analysis, it is anticipated that parking demand will be accommodated despite the loss of parking with minimal circulation, and there will not be adverse effects. See response CR-TRA-1 regarding the spillover impact analysis. Mitigation Measure TRA-21 (Parking Monitoring and Community Outreach) from the Draft EIS/EIR requires Metro to complete surveys within 0.5 mile of all WSAB stations prior to and after project opening. Metro will coordinate with the City as applicable based on the results of those surveys (Mitigation Measure TRA-21 is referred to as TRA-19 in the Final EIS/EIR).
CC-1-30	Where the Project will result in a loss of off-street parking, sufficient parking will remain such that the properties will remain in compliance with the applicable parking codes. Therefore, adverse impacts were not identified as a result of the loss of off-street parking in Huntington Park.
CC-1-31	See response CR-TRA-1 regarding the spillover impact analysis. Mitigation Measure TRA-21 (Parking Monitoring and Community Outreach) and TRA-22 (Parking Mitigation Program [Permanent]) are applicable to the entire project alignment, including at the Florence/Salt Lake Station Mitigation Measure TRA-21 (Parking Monitoring and Community Outreach) requires Metro to complete surveys within one-half mile of each station to compare parking availability six months prior to the start of service to the availability six months following the start of service. Metro will coordinate with the City as applicable based on the results of those surveys (Mitigation Measure TRA-21 is referred to as TRA-19 in the Final EIS/EIR).
CC-1-32	Updated information on construction timeframes is included in the Final EIS/EIR (Chapter 4, Section 4.19 and Chapter 3, Section 3.7); specific information on timing will be determined by the construction contractor(s) prior to the start of construction. Impacts will comply with the Final EIS/EIR. As stated in Mitigation Measure TRA-20 (Transportation Management Plan [TMP]), the TMP will be developed by Metro and coordinated with local jurisdictions. TMPs are a proven strategy for minimizing potential transportation impacts through and around construction zones during construction (Draft EIS/EIR Mitigation Measure TRA-20 is referred to as Mitigation Measure TRA-18 in the Final EIS/EIR).
CC-1-33	Chapter 4, Section 4.7.1 in the Final EIS/EIR has been revised to clarify that the clusters are shown in Figures 4.7-5 through 4.7-12. Figures 4.7-5 through 4.7-12 in the Final EIS/EIR have also been updated to show boundaries for all cities and unincorporated areas. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR).

Comment ID	Response
CC-1-34	The *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR) includes details of the noise analysis, including for clusters where noise impacts would not occur. Chapter 4, Section 4.7.4 of the Draft and Final EIS/EIR only shows locations where mitigation was required and if impacts remained after mitigation. No noise impacts were identified for the clusters in Cudahy and, therefore, they are not listed in Table 4.7.7 of the Draft EIS/EIR.
CC-1-35	Section 4.7.3 of the Draft EIS/EIR identifies remaining impacts after implementation of all mitigation measures, including soundwalls. A description of soundwall noise reduction, variables, and calculation methodologies is included in Section 1.6.1.15 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR). Additional detail regarding how soundwalls work has been added to Section 1.6.15 of the report. A diagram depicting the necessary inputs for noise reduction for various distances and heights is also included. Noise barriers can be made of any outdoor weather-resistant solid material that meets the minimum sound transmission loss required by the Project. Materials that are commonly used for noise barriers include 16-gauge steel, 1-inch-thick plywood, and any reasonable thickness of concrete. Metro noise barriers are typically constructed of masonry block walls, solid plastic panels, or a combination of the two depending on design considerations. The final material is not available at this time and will be considered during final design.
CC-1-36	The noise analysis in the Draft and Final EIS/EIR follows the Detailed Noise Analysis Procedure per the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual, 2018. The Detailed Noise Analysis Procedure considers LRT sources of noise (LRT pass-by noise, traction power substation (TPSS) noise, special trackwork, and crossing signals) and mitigation measures such as soundwalls. Neither the procedure, nor the FTA Manual as a whole, includes methodology related to implementing a calculation for reflected noise. The assessment of soundwall effectiveness takes into consideration the height of the receptors, height of the soundwalls, and the distance of the receptor from the source and soundwall. The noise analysis was reviewed by FTA and found to be consistent with the analysis procedures to assess transit noise. The FTA Detailed Noise Analysis Procedure includes a built-in assumption for reflection that occurs as a result of different surfaces the soundwaves travel across, including noise barriers. The barrier noise reduction calculation was completed using the non-absorptive (reflective) formula that considers the reflective properties of noise barriers.

Comment ID	Response
CC-1-37	Feasible and appropriate mitigation measures have been applied where impacts were identified, as described in Chapter 4, Section 4.7.4.2 of the Draft EIS/EIR. These mitigation measures include soundwalls, low impact frogs to reduce crossover noise, and TPSS noise reduction measures. Soundwalls intended to minimize impacts at sensitive receptors within the City of Cudahy were found to be feasible. However, to maintain roadway access, soundwalls cannot continue through intersections, which will leave a gap in the wall. Soundwalls work by blocking the path of noise from source to receptor and gaps reduce their effectiveness. This condition occurs at the Santa Ana Street crossing within the City of Cudahy. Mitigation Measures NOI-4 (Crossing Signal Bell Shrouds) and NOI-5 (Gate-Down-Bell-Stop Variance) were recommended to further reduce noise at grade crossings in the Draft EIS/EIR but require California Public Utilities Commission (CPUC) approval. The two mitigation measures were not included as part of the mitigated analysis in case they were not approved. NOI-4 (Crossing Signal Bell Shrouds) and NOI-5 (Gate-Down-Bell-Stop Variance) have now been incorporated as Project Measures NOI-1 (Crossing Signal Bells) and NOI-2 (Gate-Down-Bell-Stop Variance) within the Final EIS/EIR and their associated reductions are included in the analysis based on Metro's experience implementing these measures on other projects and in coordination with CPUC subsequent to circulation of the Draft EIS/EIR. Project Measures NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop Variance) remain subject to CPUC approval. Additional analysis has been prepared since the Draft EIS/EIR to identify possible additional noise reduction measures. The noise analysis in Section 4.7.3 and 4.7.4 of the Final EIS/EIR incorporates additional analysis completed since the Draft EIS/EIR to identify possible additional noise reductions. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR). Residual noise impacts have been reduced since the Draft EIS/EIR. The FTA noise impact criteria are exterior noise standards and window or sound insulation or curtains would not reduce exterior noise levels. Window insulation is also ineffective when windows are opened, which allows noise to enter the residence. Buildings also have varying noise reduction effects dependent on the construction of the building. Insulation of windows may not result in adequate noise reduction if other house components, such as unsealed doors and walls, do not provide adequate noise insulation. Noise mitigation is most effective when applied at the source because it limits the noise before it gets to the sensitive receiver and has less variability in effectiveness. Mitigation Measures NOI-1 (Soundwalls), NOI-2 (Low Impact Frogs), and NOI-3 (Wheel Squeal Noise Monitoring) and Project Measures NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop Variance) will be implemented to reduce noise from the light rail vehicle. Other measures such as resilient or damped wheels only provide minor reductions in noise and are intended for reduction of noise at sharp curves. Preventative maintenance, which is a recommended measure from FTA, is not a quantifiable reduction but is a Metro standard practice. Quiet Zones are designed to reduce noise from freight or commuter rail systems that have specific horn sounding requirements in excess of 100 dBA.
CC-1-38	The noise impact assessment methodology outlined in the FTA *Transit Noise and Vibration Impact Assessment Manual* does not recommend presentation of noise contours for noise impacts of light rail transit (LRT) projects. The noise analysis includes detailed noise levels at identified sensitive receptors, their potential to experience noise impacts, mitigation reductions, and identification of residual impacts. Existing ambient noise levels were measured at sensitive receptors, which includes noise generated by existing roadways. See response CR-NOI-1 regarding guidance used for the noise impacts analysis and proposed mitigation measures to reduce noise levels during operational activities.

Comment ID	Response
CC-1-39	The Project is an LRT project and will use LRT vehicles consistent with those used elsewhere in the Metro system. Metro selects wheels that are compatible with its vehicle fleet and provide low-maintenance reliable service. Metro LRT vehicles are equipped with resilient wheels instead of solid steel wheels, such as those used on freight rail systems. There are several different types of resilient wheels used on light rail vehicles; the most common resilient wheels have small rubber blocks that separate the wheel tread from the hub, thereby substantially reducing the occurrence and amplitude of wheel squeal. Metro's LRT wheels are low-noise when maintained within tolerances and operate on well-maintained track designed with long-radius curves. Metro conducts regular maintenance of both LRT vehicle wheels and tracks, which limits the potential for increased noise related to poorly maintained systems. Curves with a radius of less than 600 feet could result in generation of wheel squeal by the LRT vehicles. There are no curves within the City of Cudahy that will increase the incidence of wheel squeal. Curves where wheel squeal may occur are noted in the table included in Mitigation Measure NOI-3 in Section 4.7.4 of the Final EIS/EIR.
CC-1-40	Additional detail regarding low-impact frogs and ballast mats was added to Section 4.7.4.2 of the Final EIS/EIR. Rail switches (where two sets of track connect) generate increased noise and vibration levels when trains cross over the gaps between the tracks, creating a "clickity-clack" sound. Low-impact frogs are crossovers with a spring-loaded or moveable mechanism that closes the gap between rails at the crossover thereby reducing the noise and vibrations caused by trains passing over gaps in the rails. A ballast mat consists of a rubber or other type of elastomer pad that is placed under the ballast, providing a cushioning layer that helps isolate the track structure from the ground below. Ballast mats are typically made from materials with damping properties, meaning they can absorb and dissipate the vibration energy generated by the passage of trains, thereby reducing the magnitude of vibrations that travel through the ground.
CC-1-41	Instances of "would" have been updated to "will" for mitigation measures in Section 4.7.4 of the Final EIS/EIR. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR). It is common for a Draft EIS/EIR to use conditional wording (i.e., "would"), particularly when there are multiple alignments under consideration and a mitigation measure may not apply to the alternative that advances as the LPA.

Comment ID	Response
CC-1-42	Soundwalls will follow the Metro Rail Design Criteria or equivalent criteria, which require the use of landscaping for soundwalls and retaining walls, as appropriate. These features were identified for graffiti management, but also soften the view and enhance the aesthetics of these walls. Soundwalls will also follow the WSAB Urban Design Guide, which will incorporate landscaping on or along retaining walls and soundwalls that includes vines or a landscape buffer where there is adequate space to improve the aesthetic quality of the transit environment. Salt Lake Avenue between Walnut Street and Olive Street is within the Residential Landscape Unit. Although residents along Salt Lake Avenue between Walnut Street and Olive Street currently have views of the residences across the street and rail right-of-way (ROW), these visual elements are not scenic resources. As stated in Table 4.4.6 in Chapter 4, Section 4.4.3.2 of the Draft EIS/EIR, the soundwalls are not within the viewshed of scenic resources. Existing walls along the perimeter of the residential properties range from approximately 3 to 6 feet in height. Additionally, the one-story residential structures are approximately 15 to 25 feet in height. The proposed 8-foot-tall soundwalls will be consistent with the height of these structures (e.g., existing walls and residential buildings). Therefore, the soundwalls will not degrade the overall visual character and quality of the Affected Area. Figure 4.4-6 in Chapter 4, Section 4.4.3.2 of the Draft EIS/EIR depicts the change in visual character and quality of the Affected Area on Salt Lake Avenue at the Huntington Park Community Center. In this area, a retaining wall with fencing on top will be placed on the west side of the La Habra Branch ROW. As further discussed in greater detail in Section 5.2.3 for corresponding Figure 5-4 of the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* (previously Appendix I of the Draft EIS/EIR), "A soundwall, which is not visible in the rendering, will be placed along the east side of the rail ROW immediately next to the walls of the adjacent residential properties." In this rendering, the soundwall is not visible because it is situated behind the retaining wall with fencing on top. Where residential properties are situated on both sides of the La Habra Branch ROW between Live Oak Street and Olive Street, 8-foot-tall soundwalls will be situated on the northeast side of the La Habra Branch ROW and a combination of retaining walls and soundwalls will be situated on the southwest side of the La Habra Branch ROW. Opportunities for artworks will be assessed as part of the overall project art program. Metro will work with local community arts and culture representatives throughout the implementation of the project art program. An art review panel, which will include arts professionals connected to the project corridor communities, will make recommendations for the commission of artists.
CC-1-43	Within the Cities of Huntington Park and Cudahy, soundwalls will be constructed of material that does not cast glare. Although the top of the LRT vehicles will be visible above the soundwalls, the materials used for the LRT vehicles also will not cast glare. The LPA will follow Metro Rail Design Criteria, which requires light and glare to be directed away from adjacent properties. Directional shielding will be used, where needed, to avoid the intrusion of unwanted light and glare into adjacent sensitive land uses, such as residences. All surfaces of station materials will minimize glare and heat gain, and overly reflective/mirror-like surfaces will be avoided to minimize specular reflection. Additional clarifying analysis regarding light and glare has been added to Chapter 4, Section 4.4.3.2 of the Final EIS/EIR and to Section 5.2 of the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report*.
CC-1-44	Please refer to the responses to the individual comments from the city.

City of Downey

Please see the attached comment letter from the City of Downey, dated September 27, 2021. CC-4-1

City of Downey

September 27, 2021

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

RE: City of Downey Comments – Draft Environmental Impact Statement/Environmental Impact Report for the West Santa Ana Branch (WSAB) Transit Corridor Project

Dear Mrs. Khanna:

The City of Downey is eager to be a part of the Los Angeles County Metropolitan Authority (Metro) project to provide high-quality reliable transit service to communities in southeastern Los Angeles County. This project is anticipated to increase mobility and connectivity that will accommodate future employment and population growth in the region that could otherwise worsen congestion of the roadway network. The West Santa Ana Branch (WSAB) Transit Corridor project is expected to improve travel times on local and regional transportation networks and anticipated to serve as a benefit to the residents of Downey and surrounding communities. While, the overall project is supported, it is important to ensure that all potential impacts are properly assessed and planned for to ensure that the intended benefit does not result in unintended harm to the communities that will support this new transit corridor. CC-4-2

The purpose of this letter is to respond to our review of the Draft Environmental Impact statement/Environmental Impact Report (Draft EIS/EIR) for the WSAB Transit Corridor Project. A relatively short segment of the proposed light rail transit (LRT) alignment for Alternatives 1, 2, and 3 extends through the City of Downey. The entire segment located in the City of Downey extends from just north of Flores Street southerly to Gardendale Street, a distance of approximately 1,700 feet. The proposed alignment transects a largely non-residential area located in the City's southwest corner. Our major concerns are related to the proposed Gardendale Station and the associated spillover impacts that the station will have on our community.

Impacts of Gardendale Station

As indicated above, the majority of our concerns are related to the environmental impacts associated with the operation of the proposed Gardendale Station. The at-grade Gardendale Station would be located within the existing San Pedro Subdivision ROW, just north of Gardendale Street. Access to the station platform would be provided by a new pedestrian walkway located on the south end of the platform that would connect to the sidewalk located on the north side of Gardendale Street. Emergency access to the station platform would be provided on the north end of the platform. The existing freight tracks would then be relocated to CC-4-3

the west to accommodate the station platform and the LRT tracks. No parking facilities are proposed at this station.

The City is very concerned about the lack of parking at the proposed Gardendale Station and how this facility may impact vehicular and pedestrian safety along Gardendale Street. According to the Draft EIS/EIR, the travel demand model stated that no parking would be provided for the Gardendale Station so a parking supply analysis was not conducted for this location and therefore, parking demand was not projected for this, or any, stations that are not planned to provide parking. As a result, we have no way of knowing the degree of spillover parking that may occur. The EIS/EIR simply stated that "*For these stations [those stations without parking facilities], it is assumed that no transit parking would materialize during operation of the Project as there would not be a dedicated parking supply.*" This is an assumption that appears to be presented as a statement of fact, which is not supported by analysis of the proposed project or any commonly known and observed traffic and parking patterns in the region. CC-4-3

The EIS/EIR identifies the project purpose and need of the project by stating that residents within the Study Area have two primary travel options, private automobile and public transit. The need description further states that, although the urban rail system is expanding, the Study Area has limited direct connections to new or extended lines. The EIS/EIR later identifies that the estimated number of daily boardings at the Gardendale Station will range between 1,000 to 1,400 patrons. The acknowledgement of limited direct connection through public transit leads to the presumption that private automobiles, the other primary travel option for the region, will be utilized to access the Gardendale Station leading to spillover parking impacts to the surroundings area.

Spill-Over Parking Impacts

The EIS/EIR states that "*...it is not anticipated that transit passengers would access stations without dedicated transit parking ... On-street parking supply is more available around the Pacific/Randolph, Florence/Salt Lake, and Gardendale Stations; therefore, if transit passengers access these stations via car, on-street parking capacity would likely be available to accommodate drivers without displacing others using the spaces. Therefore, spillover parking impacts would not occur at these stations* [refer to page 3-83, Spill Over Parking Impacts]." However, an analysis of available on-street parking was not actually conducted around the Gardendale Stations to determine if parking demand could be accommodated in the event potential LRT passengers do attempt to drive to this station. The property located to the west is occupied by the Los Angeles County Department of Public Works and is not available to the public and the land located to the east is privately owned. On-street parking is not available because of a bicycle lane and vehicle travel lanes so it is unclear where LRT patrons are expected to park. CC-4-4

The Draft EIS/EIR states in numerous places (for example, Page 3-83) that "*on-street parking supply is more available around the Pacific/Randolph, Florence/Salt Lake, and Gardendale Stations...therefore, if transit passengers access these stations via car, on-street parking capacity would likely be available to accommodate drivers without displacing others using the spaces. Therefore, spillover parking impacts would not occur at these stations.*" This statement is simply not true as it applies to the Gardendale Station. As indicated earlier in this letter, the Draft EIS/EIR does not identify the true potential parking availability surrounding the Gardendale Station and did not assess the potential parking demand impacts to provide a clear indication of the parking need that will be generated from the opening and operation of this station.

Spill-Over Parking Impacts and Deferred Mitigation

Further concern regarding the lack of parking demand analysis for the Gardendale Station is generated by Page 3-105 of the Draft EIS/EIR which includes two mitigation measures that appear to defer both analysis and mitigation of impacts from the new WSAB stations. For example, Mitigation Measure TRA-21 states the following:

- Within the one-half-mile area surrounding each WSAB station, an assessment would be conducted to monitor on-street and off-street parking activity resulting from project operation. The assessment would compare parking availability prior to the opening of service to the availability six months following the opening of service. Surveys would be conducted at each station area to identify where WSAB parking demand is at least 20 percent greater than the demand before opening of service (i.e., the new transit service has increased parking demand by 20 percent or more).
- Metro would work with the appropriate local jurisdiction, business owners, and affected communities for that station area to assess the need for an appropriate on and off-street parking management program, considering the nearby community's and each proposed station's parking needs.
- Specific parking management strategies could include restriping, modifying parking restrictions, and adjusting the time limits for on-street parking. For off-street parking, signing and enforcement services could be included.
- Another element would be implementing or enhancing a residential permit parking program for the affected neighborhoods. Metro would coordinate with and support jurisdictions in outreach meetings within the affected communities to gauge the interest of residents participating in a residential permit parking program (prior to the opening of the new light rail service), regardless of whether parking shortages have been identified.

CC-4-5

While the proposed mitigation appears to provide follow-up assessment to mitigate parking impacts for stations where parking facilities will be provided; the aforementioned mitigation measure does not address the spillover parking issues for stations that are not planned to be provided with parking facilities. Mitigation Measure TRA-21 further describes community outreach for the development of a Parking Mitigation Program. In reality, for these stations, this is deferring mitigation as parking activity has never been assessed for the stations without planned parking facilities such as the Gardendale Station. The assessment and questions identified in these proposed mitigation measures should have been addressed as part of the environmental impact analysis. The City of Downey requests that a parking demand assessment be conducted to truly assess the spillover parking impacts that will result from the operation of the Gardendale Station.

Failure to Clearly Identify Potential Station Parking

The EIS/EIR provided information gathered from survey observations within multiple tables throughout the document but, the survey data was not referenced or readily available for review to verify the observations and conclusions made. Table 3-8 indicates that a survey identified 116 acres of land that was available for parking around the Gardendale Station (an area within a 0.25 mile radius). In addition, 688 on-street parking spaces were observed with only 40% of these spaces being utilized. Other than the information in the table, no survey data or other information was provided regarding the location of these spaces and the time of the survey. Later, in Table 3-10, the following information is provided regarding the Gardendale Station, *"There were no public off street parking lots observed near the proposed station area. The County of Los Angeles Department of Public Works operates the Hollydale Yard of off-street parking (6.5 acres) between the proposed corridor and Garfield Avenue. There is also private off-street parking (2.5 acres) adjacent to the east side of the proposed corridor."* These statements coupled with the lack of supporting analysis reinforce our concerns because the tables appear to show an abundance of available parking while also stating that the only parking

CC-4-6

surrounding the Gardendale Stations is privately owned property that will not be available to patrons of the new Gardendale Station. The City requests to see the survey information which clearly indicates the areas where available parking was observed and when these surveys were conducted. CC-4-6

Daily Boarding (Station Boardings)

The Draft EIS/EIR identifies the anticipated daily boardings for all proposed stations under the various Alternatives. Under Alternative 1, the Gardendale Station is projected to have 1,272 daily boardings. Under Alternative 2, the Gardendale Station is projected to have 1,371 daily boardings. Finally, under Alternative 3, the station boardings are projected to be 1,013 daily boardings. Given the relatively high number of boardings at this station, there is continued concern over where the prospective patrons will park and what assurances can be made to ensure that the parking supply will be adequate to meet the future demand. The City is requesting that a parking demand analysis be conducted for the Gardendale Station to determine the actual parking need and potential spillover so that this impact can be appropriately mitigated. CC-4-7

Intersection Impacts

The Draft EIS/EIR identified proposed mitigation for Intersections 68 and 70 in Table 3-43 however intersection 69 is depicted in Figure 3-14 with no description or explanation of potential impacts to the intersection. The discussion provided on Page 3-97 does not provide any indication as to whether this intersection 69 (Gardendale/Dakota) is impacted or requires mitigation. There is no discussion to identify what effects the proposed mitigation at Intersection 68 and 70 will have on Intersection 69. Proposed mitigation for these intersections identifies the City of South Gate as the applicable jurisdiction of approval for this measure; however, the City of Downey is a responsible agency for the installation of new traffic signals or any other mitigation that will occur on the north side of the Gardendale Street public right-of-way. The City of Downey requests additional information be provided to explain how the additional westbound thru lane on Gardendale Street, at Industrial Avenue, can be accommodated within the existing right-of-way. CC-4-8

Appendix D, Section 4.4 Active Transportation identifies that a Class II bikeway is also currently in place on Gardendale Street, adjacent to the proposed WSAB station between Lakewood Boulevard and Garfield Avenue. This bike lane does not appear to be factored into the proposed mitigation for the station and it is not clear that potential impacts to this bikeway were appropriately assessed. It is important to also note that intersections 68 and 70 were identified as being significantly impacted by the proposed project (refer to Table 3-14 and others).

Loss of Off-Street Parking

The Draft EIS/EIR indicates the LRT alignment will result in the loss of 32 parking spaces at the Los Angeles County Agriculture facility. Table 3-34 indicates this loss parking will occur at the Los Angeles County Agriculture building located at the southern end of Vulcan Street. The Draft EIS/EIR indicates this parking loss will be due to the track work. The EIS/EIR was not clear and as a result, the City of Downey seeks clarification and confirmation that this will be the only location that will be impacted. There is concern over additional impacts in the area given the freight tracks will need to be relocated further west through the Downey area to accommodate both the new station platform and the new LRT tracks. CC-4-9

Pedestrian and Vehicular Safety Along Gardendale Street

There will be hundreds of potential drop-offs and pick-ups at the Gardendale Station every day. With no designated drop off-areas, parking facilities, or safe paths of travel linking patrons from parking areas to the proposed Gardendale Station, the City is very concerned that pedestrians and vehicles will make unsafe exits to board and disembark the station off of Gardendale Street. We are also concerned about the lighting in and around the station during the night-time periods. We are requesting specific design measures, not generalized statements that could apply to any project. The LRT will operate 22 hours a day during the weekday periods from 4:00 AM to 2:00 AM. Headways will range from one train every 2 ½ minutes during the busiest times to one train every 20 minutes during the late night and early morning periods. CC-4-10

Construction Activities

The Draft EIS/EIR, Section 2.5.6 Construction Activities (Page 2-56), indicates that simultaneous construction may be effective in reducing the overall construction duration. Working hours of construction would vary to meet the type of work being performed and to meet local ordinance restrictions. Nighttime and weekend construction may be required to mitigate potential impacts to the commute period and traffic congestion, and to accommodate construction scheduling for specific work activities. Such nighttime and weekend construction activities may include, but are not limited to, construction within freeway ROW, tunneling operations, trackwork construction, grade separation construction, catenary wire installation, and construction of other cut-and-cover sections. Construction activities are anticipated to occur over the course of approximately six years, commencing in 2022 and ending in 2028. We are requesting the EIS/EIR indicate the timing and duration of construction for those project elements located in the City of Downey. The EIS/EIR needs to indicate the mitigation measures that will be effective in ensuring that traffic on local streets is addressed. This area of Downey is a major concentration of businesses in the community, and we look forward to more definitive mitigation to ensure that construction impacts are reduced to the greatest extent possible. CC-4-11

Project Benefits

Table 4-5-9 of the EIS/EIR indicates there would be a significant decrease in air emissions between 2017 and 2041. The decline in emission would occur even with an increase from approximately 463.25 million vehicle miles travelled (VMT, 2018) to approximately 606.33 million VMT in 2042. According to the Draft EIS/EIR, these emission reductions between 2017 and the year 2042 can be attributed to alternative-fueled passenger vehicles (i.e., electric and natural gas) added to the vehicle fleet and continued improvements in fuel efficiency. The Draft EIR/EIR states that, "the incremental increases in particulate matter emissions relative to Existing Conditions are solely attributed to ambient regional population growth spurring additional regional VMT and associated road dust and break and tire wear. As regional air quality continues to improve in the future, the deposition of dust on roads will be reduced." We request clarification regarding the accuracy and relevance of the last statement. Additionally, we would like clarification be provided as to whether the year 2042 estimates also considered the off-site emission generated as part of the energy production required for the alternative powered vehicles. The analysis of air quality impacts for the operational objective appeared to focus only on the VMT reductions. The analysis did not indicate if emissions calculations consider the offsite emissions related to the generation of electrical power for the trains themselves and the other project elements (lighting, signals, station equipment, etc.). We ask that this be clarified and/or that the analysis of these project elements be included in the EIS/EIR. CC-4-12

Greenhouse Gas Reductions

The analysis of the proposed project's greenhouse gas (GHG) impacts relies on VMT reductions to demonstrate that there would be a GHG benefit. While we do not argue that reducing freeway congestion would be beneficial in reducing GHG. It appears that Table 4.6.2 makes an effort in establishing a connection between the operation of the LRT and the consumption of electricity and the associated off-site GHG emissions. The analysis relies on light rail vehicle revenue per mile. It is not understood why the Draft EIS/EIR didn't just provide an estimate of electrical consumption with the resulting GHG emissions associated with the consumption.

The second row of Table 4.6.5 is labeled "LRT Propulsion." We seek clarification as to whether this refers to offsite electrical power generation because analysis of the proposed project's greenhouse gas (GHG) impacts relies on VMT reductions to demonstrate that there would be a GHG benefit. As previously noted, we do not dispute that reducing freeway congestion would be beneficial in reducing GHG; however, it appears that Table 4.6.2 tries to make a connection between the operation of the LRT and the consumption of electricity and the related off-site GHG emissions. The analysis relies on light rail vehicle revenue per mile. Again, it is unlcear why the Draft EIR/EIR didn't just provide an estimate of electrical consumption with the resulting GHG emissions.

CC-4-13

Noise Impacts, General Comment

The Draft EIS/EIR indicates the potential noise impacts would largely be the same for all project alternatives for either the at-grade or aerial segments. The noise analysis included in the Draft EIS/EIR is very confusing in its reference to "clusters." For example, the Draft EIS/EIR states, "Alternative 3 would affect clusters 33 through 347 and would result in moderate impacts at 59 of 289 Category 2 clusters and severe impacts at 153 Category 2 clusters. Impacts at Category 3 clusters would remain the same as Alternatives 1 and 2." The use of graphics would assist the reader in identifying the location and extent of the affected properties. This narrative is not meaningful without any exhibits or reference maps to clearly identify potentially impacted areas. The Draft EIS/EIR also indicates that crossing signal bells at the locations identified in Table NOI-4 would be equipped with shrouds to direct bell noise away from sensitive receivers. With these shrouds, the crossing signal bell noise would not exceed 104 dBA SEL at 50 feet. The nearest homes to the LRT line are located approximately 650 feet from the crossing on Imperial Highway. We understand the need for these crossing signals for both pedestrian and vehicular safety. However, we question whether these shrouds will be sufficient mitigation given the potential headways during the late night and early morning periods.

CC-4-14

Safety and Security

The Draft EIS/EIR indicates that "*pedestrian and bicycle safety during operation would consider safety along the alignment, at station locations, at designated crossings, and at proposed parking facilities.*" These statements are respectable however clear evidence is not provided in the EIS/EIR to show that these goals can be implemented. Additionally, the EIS/EIR did not provide analysis to indicate if the additional security required for the Gardendale Station would affect the Downey Police Department. The City seeks clarification regarding the implementation of the pedestrian and bicycle safety alignments as well as clear indication of potential impacts to the Downey Police Department as a result of the Gardendale Station operation.

CC-4-15

Employment Center

An additional item of note is that Section 1.3.1 of the Draft EIS/EIR cites the high population and employment densities of some cities throughout the project area. Figure 1-3 correctly shows the City of Downey is also an important employment center within the Gateway cities however, it is not cited in the narrative description within this section. The City's employment center is well established and includes institutional, medical, specialized manufacturing, and other labor-intensive land uses. The daytime population density of Downey, when including these employment centers, could well exceed those of the other cities noted in the Draft EIS/EIR. This information should be stated in the EIS/EIR. CC-4-16

Respectfully,

CITY OF DOWNEY

Gilbert A. Livas
City Manager

City of Downey – CC-4

Comment ID	Response
CC-4-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-4-2	See response CR-TRA-1 regarding the spillover parking analysis.
CC-4-3	See response to comment CC-4-2. The spillover parking analysis has been updated in the Final EIS/EIR to include stations that do not provide transit parking, including the Gardendale Station, to determine corridor-wide demand. Table 3.20 in Chapter 3, Section 3.4.4 of the Final EIS/EIR notes that the projected 2042 transit parking demand at the Gardendale Station is 200 spaces. However, when transit parking is restricted to the five stations with transit parking, a surplus of 50 parking spaces was projected, and overall parking demand throughout the corridor decreases by approximately 60. The two forecasts show that there will be adjustments to demand if passengers seeking to park at stations encounter limitations of supply. At stations where transit parking is not provided, it is anticipated that demand will shift to the stations with transit parking or drivers will find another way to access the station. The Firestone Station and I-105/C Line Station, nearest to the Gardendale Station, are projected to have excess parking supply.
CC-4-4	See response to comments CC-4-2 and CC-4-3.
CC-4-5	See response to comments CC-4-2 and CC-4-3. Mitigation Measure TRA-21 (Parking Monitoring and Community Outreach) is referred to as TRA-19 in the Final EIS/EIR. Mitigation Measure TRA-19 is not a deferral of analysis or mitigation. The Project is anticipated to begin revenue service in 2035. Determining impacts that may occur from spillover parking when the Project begins revenue service would be speculative as parking supply and/or demand could change compared to existing conditions. To account for this uncertainty, Mitigation Measure TRA-19 commits Metro to studying actual conditions after the Project opens, comparing the results to conditions six months prior to the Project opening, and working with the cities to identify measures to address spillover parking if it occurs. The measure applies to 0.5 mile around all stations, even those without proposed transit parking. It should also be noted that the California Environmental Quality Act (CEQA) and National Environmental Policy Act do not require an analysis of or mitigation measures for parking shortages; an environmental document is only required to address parking shortages to the extent the shortage has secondary impacts on the environment (see *Save Our Access–San Gabriel Mountains v. Watershed Conservation Authority* (2021) 68 Cal.App.5th 8.). No such secondary impacts have been identified.

Comment ID	Response
CC-4-6	Table 3.8 in Chapter 3 of the Draft EIS/EIR summarizes on-street parking surrounding the project stations. The parking survey area of 116 acres around the Gardendale Station reflects the area that was surveyed, not the land available for parking. The Affected Area for parking is 0.25 mile around each station, along streets immediately adjacent to the alignment and other project features, and off-street parking lots where permanent easements or acquisitions are required for the Project. As noted in Table 3.8 of the Draft EIS/EIR, in some cases a smaller or larger area was surveyed to determine parking supply and utilization based on existing characteristics and constraints that could influence the distance an individual may walk from a parking space. The visual survey map is included in Appendix A of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (previously Appendix D to the Draft EIS/EIR). Observations of parking around the proposed Gardendale Station were made between 9:30 a.m. and 12:00 p.m. on Friday, September 15, 2017. Table 3.8 in Chapter 3 of the Draft EIS/EIR identifies parking by location (side street) and notes if there are parking restrictions. Updated parking surveys were conducted on select streets near the Gardendale Station (i.e., Gardendale Street, Monroe Avenue, Taft Avenue, Center Street, Industrial Avenue, and McKinley Avenue) on Wednesday, May 17, 2023, between 6:30 a.m. and 8:00 a.m. Table 4.46 identifies parking by location (side street) and notes if there are parking restrictions. The parking identified is located in publicly accessible locations.
CC-4-7	See responses to comments CC-4-2 and CC-4-3.
CC-4-8	Intersection No. 69 (Gardendale and Dakota) was included in the graphic for context. As shown in Table 3.14 in Chapter 3 of the Draft EIS/EIR, this intersection will operate at level-of-service (LOS) A, and mitigation is not required. These results are also applicable to the Locally Preferred Alternative (LPA), which was identified in the Draft EIS/EIR as Alternative 3. This intersection is modified under Project Measure TR PM-6 (Dakota Avenue Street Conversion) to accommodate the LRT tracks, which will convert Dakota Avenue to one way (northbound will be eliminated), and only right-in access will be allowed. Further mitigation, beyond the project measure, is not required for that intersection because it will operate at LOS A. Text in Chapter 3, Table 3.26 of the Final EIS/EIR and in Chapter 8, Table 8.13 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* has been modified to indicate that Mitigation Measures TRA-12 (Gardendale Street/ Center Street) and TRA-13 (Gardendale Street/ Industrial Avenue) (referred to as TRA-13 and TRA-14 in the Draft EIS/EIR; the text of the mitigation measures remain unchanged) are subject to the approval of City of Downey and City of South Gate.
CC-4-9	As a result of modifications to the LPA, the parking loss at this location has been avoided, and parking will not be removed at the Los Angeles County Agriculture building. This table, now Table 3.19 of the Final EIS/EIR, reflects that off-street parking loss will not occur within the City of Downey. However, the LPA will require the loss of on-street parking along Gardendale Street between Garfield Avenue and Arizona Avenue. Table 3.18, of the Final EIS/EIR has been updated to reflect this parking removal. At this location, the overall parking supply will not decrease below the observed demand, and impacts will not be adverse.

Comment ID	Response
CC-4-10	The LPA will include modifications to provide safe and ADA accessible access for pedestrians and bicyclists at stations. Additionally, the LPA will include new pedestrian connectivity to access stations. At the Gardendale Station, a new pedestrian walkway will connect to the sidewalk on the north side of Gardendale Street providing a safe path of travel. As a parking facility is not proposed at this station, new vehicle access is not provided; therefore, unsafe vehicle exits will not be introduced. Parking demand in this station vicinity will be accommodated at the nearby Firestone Station or I-105 C/Line Station, which have parking facilities and designated vehicle access. Specific lighting plans are not included as part of the Advanced Conceptual Engineering design plans. As the design progresses, Metro will follow Metro guidelines on lighting in the Metro Rail Design Criteria (MRDC), such as: ▪ Be functional, yet complementary to other aesthetic features in the space that provide an atmosphere of relative comfort, pleasantness, and cleanliness of surroundings, and a sense of personal safety and security. Lighting for passenger stations should be bright and cheerful. ▪ Provide adequate lighting levels rated for continuous operation, contrast ratios and other visibility attributes necessary to stimulate productivity, facilitate the use of facilities by patrons or the successful completion of tasks in a timely yet safe manner, and maintain appropriate surveillance levels under all ambient light conditions. ▪ Specific illumination levels will adhere to Section 7.3 of the MRDC Chapter 7 – Electrical. Metro has illuminance requirement levels within the MRDC. These numbers can be adjusted in conjunction with additional City requirements as coordination continues per an executed Master Cooperative Agreement.
CC-4-11	Chapter 3, Section 3.7 and Chapter 4, Section 4.19 of the Final EIS/EIR include updated construction information for the LPA. While the Draft and Final EIS/EIR provide general construction durations based on Project goals and milestones, it is not possible at this phase of the Project's planning process to develop a detailed construction schedule. The specific construction schedule will be informed by such factors as the availability of the construction contractor(s) workforce, equipment and materials, value engineering, and stakeholder coordination. Specific information on timing will be determined by Metro and the construction contractor(s) prior to the start of construction, taking into account these and other related factors. Work will be in compliance with the Final EIS/EIR. Many of the project measures and mitigation measures in the Draft EIS/EIR are applicable to the LPA during construction and are not necessarily location specific. However, the Draft EIS/EIR concluded that for Alternative 3, adverse and unmitigated impacts could still occur for certain topics, including traffic and noise during construction. During construction of the LPA, Metro and the construction contractor will coordinate with applicable jurisdictional agencies. The development of the Transportation Management Plan (TMP) as part of Mitigation Measure TRA-18 (referred to as Mitigation Measure TRA-20 in the Draft EIS/EIR) will begin as design advances and prior to the start of construction, with input from the jurisdictional agencies. The plan will be implemented during construction. TMPs are a proven strategy for minimizing potential transportation impacts through and around construction zones during construction.

Comment ID	Response
CC-4-12	The particulate matter emissions discussed in the Draft EIS/EIR included vehicle exhaust emissions, brake wear emissions, tire wear emissions, and resuspended road dust emissions. The average vehicle exhaust emissions will decrease in the future as the fleet turns over to newer vehicles meeting more stringent emissions standards. The brake wear, tire wear, and resuspended dust emissions do not decrease in future years on an average per-vehicle basis, and collectively those emissions make up over 95 percent of the particulate matter emissions from on-road regional vehicle miles traveled (VMT) presented in the Draft EIS/EIR. Therefore, the increase in regional VMT produces a proportionate increase in emissions of these dust sources that more than offsets the decrease in exhaust emissions from improved fuel efficiency and emissions standards. Indirect air pollutant emissions associated with electric-generating facility operations are not included in the air quality analysis for the Project because those emissions are regulated through permitting programs administered by the South Coast Air Quality Management District (SCAQMD) or another appropriate permitting agency outside of the SCAQMD boundary. Emissions from permitted facilities have been accounted for in regional and statewide emissions inventories, and the Project will not require the expansion of existing production levels to meet demand. This approach is consistent with SCAQMD CEQA methodology for analyzing criteria pollutant emissions because emissions from power plants are subject to local, state, and federal control measures that are assumed to implement the maximum feasible level of mitigation for stack emissions. However, because of the global effect of greenhouse gas (GHG) emissions, it is customary to account for all direct and indirect sources of emissions for the GHG emissions assessment; therefore, the off-site electricity generation emissions required to power the stations, parking facilities, and light rail propulsion are included in the GHG emissions analysis. In accordance with the California Renewable Portfolio Standard (RPS) program requirements codified in Senate Bill 100, electricity delivered to the LPA facilities will be derived from a minimum of 60 percent renewable resources by 2030, 95 percent carbon-free resources by 2040, and 100 percent carbon-free resources by 2045. As of 2021, Southern California Edison's (SCE) delivered electricity supply comprised 31 percent from eligible renewables, and its RPS procurement was approximately 36 percent.

Comment ID	Response
CC-4-13	The Draft EIS/EIR accounted for indirect GHG emissions resulting from electricity generated to power the light rail vehicles. As noted in the GHG emissions analysis, Metro has prepared studies and emission inventories that quantify the amount of electricity needed to power a light rail line based on revenue miles traveled for the line. Table 4.12.4 in the Energy section of the Draft EIS/EIR included estimates of total operational energy demand for operation of each LRT alignment under each alternative evaluated in the Draft EIS/EIR. Annual Metro rail revenue miles traveled, and the associated electricity consumption, were used to estimate an average per-revenue-mile consumption factor for Metro rail propulsion in the analysis. Table 4.6.2 of the Draft EIS/EIR presents the annual LRT revenue miles that would occur with implementation of the Build Alternatives. The GHG emissions analysis focused on estimated GHG emissions, which are the relevant measure in the GHG reduction consideration. The calculated electrical consumption factor was provided in the *West Santa Ana Branch Transit Corridor Project Final Greenhouse Gas Emissions Impact Analysis Report* (Appendix K to the Draft EIS/EIR). Underlying calculations determined that LRT corridor operations would produce 6.75 pounds of carbon dioxide equivalents (6.75 $lbCO_2e$) per LRT mile traveled. Electricity to power the LRT alignment and stations would be provided through the electrical grid infrastructure, which is maintained by SCE and the Los Angeles Department of Water & Power (LADWP) in the project area. Under state law, both SCE and LADWP are required to expand their electricity supply derived from renewable resources to meet 60 percent of demand by 2030 and 100 percent of demand by 2045. Both SCE and LADWP have met or exceeded every renewable portfolio target promulgated at the State level to date.

Comment ID	Response
CC-4-14	The noise analysis was conducted consistent with Federal Transit Administration guidelines, which include grouping similar sensitive receivers (such as a group of single-family residences) into clusters. The results of the analysis are representative of what will be experienced by the individuals within the cluster. Figures 4.7-5 through Figure 4.7-11 in Section 4.7.4 of the Draft EIS/EIR identify locations of LRT noise impacts remaining after mitigation and soundwall locations. Figures 4.7-12 and Figure 4.7-13 in Section 4.7.4 of the Draft EIS/EIR identified freight noise impacts after mitigation. Additional figures are included in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (Appendix M of the Draft EIS/EIR). These figures have been refined in the Final EIS/EIR to reflect project refinements for the LPA and continued mitigation design. Mitigation Measure NOI-4 (Crossing Signal Bell Shrouds) was recommended for at-grade crossings with residual impacts in the Draft EIS/EIR. Conservatively, the associated reduction was not accounted for in the analysis as this mitigation measure requires additional approval before being implemented. Based on Metro's experience successfully implementing bell shrouds on other transit lines and coordination with CPUC subsequent to circulation of the Draft EIS/EIR, NOI-4 (Crossing Signal Bell Shrouds) has now been incorporated as a project feature (NOI PM-1) within the Final EIS/EIR and the associated reduction is included in the analysis. Field testing of bell shrouds implemented on existing Metro LRT systems has shown bell shrouds are effective at keeping crossing signal noise at the at-grade crossing. Project Measures NOI PM-1 (Crossing Signal Bells) remains subject to CPUC approval. As shown in Chapter 2, Table 2.6 of the Draft EIS/EIR, headways along the WSAB alignment will be reduced late at night and in the early morning periods resulting in reduced occurrences of crossing signal noise. Sensitive receptors located approximately 650 feet away are outside the screening distance of 350 feet for consideration in the operational noise analysis as they will not be exposed to excessive noise levels compared to residences located in closer proximity. Additional analysis has been prepared since the Draft EIS/EIR to identify possible additional noise reduction measures. The noise analysis in Section 4.7.3 and 4.7.4 of the Final EIS/EIR incorporates additional analysis completed since the Draft EIS/EIR to identify possible additional noise reductions. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR). Residual noise impacts have been reduced since the Draft EIS/EIR.
CC-4-15	Chapter 4, Section 4.18.3.2 and Section 5.2.3 of the *West Santa Ana Branch Transit Corridor Project Final Safety and Security Impact Analysis Report* (previously Appendix F of the Draft EIS/EIR) have been updated to include evidence-based data supporting the design features. As shown in sheet CS-208 of the Final Advanced Conceptual Alignment Design Part 2 and sheet A12-001 of the Final Advanced Conceptual Alignment Design Part 5 (Appendix B of the Draft EIS/EIR), Metro will implement safety features such as crossing gates, pedestrian crossing gates, signage, bicycle lane, raised median, and high-visibility crosswalks. Several of these features are identified by the Federal Highway Administration as "Proven Safety Countermeasures" such as the following: ▪ Medians and pedestrian refuge islands (56 percent reduction in pedestrian crashes) ▪ High-visibility crosswalks (40 percent reduction in pedestrian crashes) See response to comment CC-4-10 regarding First/Last Mile planning efforts. See response CR-SAF-3 regarding security patrols and enforcement. Security on the WSAB line, including at stations, will be provided by Metro's law enforcement and its contractors.

Comment ID	Response
CC-4-16	Section 1.3 of the Draft EIS/EIR provides an overall description of the 98-square-mile WSAB corridor Study Area that extends over 20 miles from downtown Los Angeles to the City of Artesia. The narrative in Section 1.3.2 provides a general summary of the types of activity sites within the Study Area, including employment centers. Additional detail, where applicable, is provided within the analysis of each environmental topic included in Chapter 4 of the Draft EIS/EIR. Please refer to Chapter 4, Section 4.1.2 of the Draft EIS/EIR for the description of land uses in the City of Downey and a discussion of consistency with Downey Vision 2025 to promote commercial uses. Section 4.2 of the Draft EIS/EIR further characterizes the demographics of the City of Downey.

City of Huntington Park

From: Raul Alvarez <RAlvarez@hpca.gov>
Sent: Tuesday, September 28, 2021 4:47 PM
To: WSAB <WSAB@metro.net>
Cc: Khanna, Meghna <KhannaM@metro.net>; Ricardo Reyes <RReyes@hpca.gov>
Subject: City of Huntington Park WSAB Public Comments
Importance: High

Dear, Metro team:

I hope this email reaches you well. On behalf of the City of Huntington Park, please accept the attached Cover Letter and Public Comments for the West Santa Ana Branch Draft Environmental Impact Report.

Please feel free to contact me if you have any questions or need more information.

CC-10-1

Respectfully,

Raul Alvarez, M.P.A.
Assistant City Manager | City of Huntington Park
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September 28, 2021

Submitted via email to: KhannaM@metro.net & wsab@metro.net

Ms. Meghna Khanna
Senior Director, Countywide Planning & Development
Mobility Corridors
One Gateway Plaza, M/S 99-22-7
Los Angeles, CA 90012

RE: City of Huntington Park: West Santa Ana Branch Draft Environmental Impact Report Public Comments

Dear, Ms. Khanna:

On behalf of the City of Huntington Park ("City"), please accept the attached public comments for the West Santa Ana Branch Draft Environmental Impact Report. In total, our City had 77 comments that pertain to our jurisdiction.

We look forward to continuing to work with Metro on this important regional transportation project. Please do not hesitate to contact us if you have any questions or need more information.

Respectfully submitted,

RICARDO REYES
City Manager

ATTACHMENT

A. West Santa Ana Branch Draft Environmental Impact Report Public Comments

Attachment A: City of Huntington Park: West Santa Ana Branch Draft Environmental Impact Report Public Comments
September 28, 2021

Comment No.	Concern/Issue Area	Raised By	Draft EIR Section/Reference	Public Comment	
1	Alternative 3 – full and partial acquisition of parcels	Community Development	At commercial property at the northeast corner of Pacific Blvd/Randolph St, approximately 24 parking spaces and some landscaping would be affected due to installation of traction power substations (TPSS).	City requests that Metro perform a parking impact study and demonstrate how the loss of parking on private property will affect street parking. Street parking is a public commodity that the City cannot afford to lose. Is it Metro's expectation that the City intervene and facilitate the transfer of the partial or full take with the private property owner? Our City will require Metro to provide a resolution to the loss of public parking spaces in the general vicinity where spaces are removed due to the project.	CC-10-2
2	Alternative 3 – full and partial acquisition of parcels	Community Development	At commercial development adjacent to Florence/Salt Lake Station, approximately 11 parking spaces and landscaping would be removed to install TPSS, but commercial uses would remain.	Metro must coordinate with the Community Development Department to provide input on removal of off-site parking (private development parking spaces) as the removal of spaces may cause the parcel to become legal non-conforming with minimum parking regulations per CUP. It is also important to note that removal of private development parking spaces impact street parking. Our City will require Metro to provide a resolution to the loss of public parking spaces in the general vicinity where spaces are removed due to the project.	CC-10-3
3	Alternative 3 – full and partial acquisition of parcels	Community Development	Partial acquisition of 2 multifamily residential properties on State St, south of Randolph St, for grade-crossing improvements; a portion of the front yard at two residential properties. Displacement of 8 residents.	Metro must coordinate with the Community Development Department on the impact to legal non-conforming setbacks once partial takes are considered and approved.	CC-10-4

				It is also important to note that removal of private development parking spaces impact street parking. Our City will require Metro to provide a resolution to the loss of public parking spaces in the general vicinity where spaces are removed due to the project.	CC-10-5
4	Alternative 3 – full and partial acquisition of parcels	Community Development	Land acquisition at southwest corner of State St/Randolph St.	At commercial property at the southwest corner of State St/Randolph St, approximately 3 parking spaces and landscaping would be affected due to grade crossing improvements. Additionally, Metro is required to provide a resolution to the loss of public parking spaces in the general vicinity where spaces are removed due to the project.	CC-10-6
5	Alternative 3 – full and partial acquisition of parcels	Public Works	Parking loss at San Antonio Elementary School.	At San Antonio Elementary School, a strip of landscaping and approximately 15 parking spaces on the property would be affected by grade crossing improvements. Coordination with LAUSD is required. City staff must be informed of the potential parking loss, which affects the flow of traffic during peak drop off and pick-up hours of the school day. Additionally, Metro is required to provide a resolution to the loss of public parking spaces in the general vicinity where spaces are removed due to the project.	CC-10-7
6.	Alternative 3 – full and partial acquisition of parcels	Community Development/ Public Works	Full parcel and partial acquisitions needed – Commercial at (S/W Corner of Randolph/Alameda) 1920 Randolph St - Storage Facility under planning review	Our City is categorically opposed to any full or partial acquisition of this parcel located at 1920 Randolph St. As such, we ask that this parcel be taken out for any consideration of the WSAB project as the City will not agree to this acquisition in any capacity. Our City has taken much effort to reach an agreement to develop parcel and improve the blithe in the area.	CC-10-8

				Many years or work have done into this development and it will be completed prior to the completion of the EIR process. Our City will oppose this acquisition and will seek legal recourse should Metro decide to include in the WSAB project.	CC-10-8
7.	Alternative 3 – full and partial acquisition of parcels	Community Development/ Public Works	Full parcel and partial acquisitions needed – Commercial at N/W Corner State/Randolph ● Mixed use development + PUDs – Planning Commission approved ● Veterans and homeless housing ● Planning Commission Case No. 2021-05 GPA/ZOA/TPM/P/DB ● Approved June 30, 2021 via Resolution No. 2021-05 ● The City Council on July 14, 2021, amended the General plan to add an affordable housing overlay and make this housing development possible.	Our City is categorically opposed to any full or partial acquisition of this parcel located at N/W Corner State/Randolph. As such, we ask that this parcel be taken out for any consideration of the WSAB project as the City will not agree to this acquisition in any capacity. This parcel is part of our Housing Element to be in compliance with state mandates (see. RHNA) thus it's a non-starter. It has taken time and effort to come to an agreement with an affordable housing developer to provide much needed housing in a community that does not have available space to build. City is in opposition to Metro or its P3 acquiring this parcel. Our City will oppose this acquisition and will seek legal recourse should Metro decide to include in the WSAB project.	CC-10-9
8.	Alternative 3 – full and partial acquisition of parcels	Community Development/ Public Works	Full parcel and partial acquisitions needed – Commercial Water Well on Florence/Salt Lake (east)	Our City is categorically opposed to any full or partial acquisition of this Water Well on Florence/Salt Lake (east). As such, we ask that this parcel be taken out for any consideration of the WSAB project as the City will not agree to this acquisition in any capacity.	CC-10-10

				This Water Well is part of our MS4 permits mandates thus it's a non-starter. Specifically, we currently have a project planned with an approximate cost of $20 million (design, environmental clearances, State permits, construction and construction management). Our City will oppose this acquisition and will seek legal recourse should Metro decide to include in the WSAB project.	CC-10-10
9.	Alternative 3 – full and partial acquisition of parcels	Community Development	2 Full and 5 partial displacement of multi-family units	Metro will need to coordinate with the Community Development Department on the impact to legal non-conforming setbacks once partial takes are considered and approved. It is also important to note that removal of private development parking spaces impact street parking. Our City will require Metro to provide a resolution to the loss of public parking spaces in the general vicinity where spaces are removed due to the project.	CC-10-11 CC-10-12
10.	Alternative 3 – Environmental Concern	Public Works	Alternative 3 – 85 trees could be affected along Randolph Street and Salt Lake Avenue	Trees not in the City's right-of-way. City maintains, prunes and waters trees. None of the trees are protected species. Our City request for the planting of other trees throughout the City: ● Species and location to be determined at a later date.	CC-10-13

				• 2 trees to be planted for each tree removed.	CC-10-13
11.	Alternative 3 – Environmental Concern	Public Works	Would increase impervious area by 8.3 acres: MS4 NPDES permit requires implementation of site design, source control, and treatment control BMPs to the maximum extent practical. Stormwater Pollution Prevention Plan (SWPPP) required to be reviewed by City's consultant	City's ability to utilize the infiltration/filtration of runoff in its annual MS4/NPDES Report. Metro and its consultants/contractors must collaborate with the City to treat and infiltrate surface runoff as defined by the latest adopted Los Angeles County MS4/NPDES permit as regulated by the State Regional Water Quality Control Board.	CC-10-14
12.	Alternative 3 – Environmental Concern	Public Works	Traffic-control improvements and way-finding features would be implemented to provide safe passage and reduce potential conflicts between vehicles and pedestrians/bicyclists traveling between the parking facility and station entrances.	Coordination with Metro's design team, P3 consultant and City staff/consulting staff is required.	CC-10-15
13.	Alternative 3 – Environmental Concern	Police Department	Include security features such as lighting, surveillance, CCTV, access control, and emergency call boxes to reduce the potential for crime and terrorist activity.	Obtain Huntington Park Police Department, Los Angeles County Fire Department and Emergency response units. Addition of two (2) light rail stations and modifications in the street configurations along Randolph Street require security. Emergency Response Plan to reflect changes. Metro must enter into an MOU with the Huntington Park Police Department. 911 calls and other safety emergency responses must be discussed; including possible funding.	CC-10-16 CC-10-17 CC-10-18

14.	Alternative 3 – Environmental Concern	Public Works	Temporary barriers and fencing along the perimeter of construction areas and additional temporary parking for construction personnel at construction staging areas would be provided.	Removal of parking spaces adjacent to Salt Lake Park on Salt Lake Avenue will cause major concerns to the community. Patrons that utilize the park will be forced to seek alternative parking that does not exist. We ask Metro to provide a solution and/or alternative to the loss of parking at Salt Lake Park. The health and wellness of the community is contingent upon the use of park space. Disadvantaged communities such as Huntington Park utilize green spaces for exercise and family outings. Loss of street and private parking near the Pacific/Randolph station will cause business patrons and residents to seek alternative parking. Loss of business revenue directly impacted by the loss of parking and available space to park. Street parking is a premium commodity and when street parking is taken by surrounding commuters utilizing the LR system, our residents will not have the ability to utilize street parking. Parking/Traffic Impact Study must be conducted and shared with City Council and administration. City seeks restitution of all parking lost as a direct impact of this project.	CC-10-19 CC-10-20

15.	Alternative 3 – Environmental Concern	Public Works	Along Randolph Street, the intersections of Wilmington Avenue, Regent Street, Albany Street, Rugby Avenue, and Rita Avenue would be modified to eliminate crossing the tracks.	Our City requests a Traffic Impact Study to be conducted in collaboration and input from City staff and officials. City seeks restitution of all parking lost as a direct impact of this project. Loss of business revenue as a result of removing street crossings at railroad tracks to be discussed with City Council and City staff. At the conclusion of the Traffic Impact Study, we request that the findings be shared with our City Council and community during a public meeting.	CC-10-21
16.	Alternative 3 – Environmental Concern	Public Works	Crossings at Malabar Street, Seville Avenue, and Arbutus Avenue. Malabar Street and Seville Avenue (traffic signalized).	Metro/P3 partners must improve pedestrian amenities and upgrade traffic signals. Reconfiguration of traffic circulation patterns must be discussed with City staff. Closure of street crossings at railroad tracks must be discussed with City Council and City staff. Pedestrian crossings are integral. Hence the need for a Traffic Impact Study to demonstrate safety at pedestrian crossings at the railroad tracks.	CC-10-22
17.	Alternative 3 – Environmental Concern	Public Works	Arbutus Avenue (no traffic signal).	Recommend placing fencing/block walls to eliminate illegal crossings.	CC-10-23
18.	Alternative 3 – Environmental Concern	Public Works	Traffic queuing to make left turns on Randolph Street onto north-south crossings.	Traffic impact mitigation measures appear to be minimized in EIR/EIS. We recommend meeting internally City staff to determine the best course of action that is not detrimental to the community. Traffic engineering team to review and traffic impacts to be presented at a City's Traffic Authority meeting.	CC-10-24

19.	Alternative 3 – Environmental Concern	Public Works	Pacific/Randolph Station located east of Pacific Boulevard.	Alignment would be located on the north side of the existing UPRR-owned La Habra Branch Right-of-Way in the median of Randolph Street. Require the relocation of existing freight tracks to the southern portion of the rail Right-of-Way with a minimum 20-foot clearance from the freight tracks. Railroad Right-of-Way would be widened by about 15 feet into the street/public Right-of-Way to accommodate the two LRT tracks and the relocated freight track. No parking facility is proposed at this station and that will have serious adverse impacts to our communities. Our City requests that Metro find alternative parking spaces for LR patrons. Not all of the Huntington Park LR patrons will be from Huntington Park. Some will be from surrounding communities that must drive to use the LR system.	CC-10-25
20.	Alternative 3 – Environmental Concern	Public Works	Florence Avenue at Salt Lake Avenue Station.	Aerial configuration and turn south to cross over Randolph Street and the freight track, and then descend back to an at-grade configuration north of Gage Avenue. Pedestrian walkway on the north side of the station platform would connect to a reconfigured sidewalk on	CC-10-26

				the south side of the Florence Avenue and Salt Lake Avenue intersection. To maintain existing sidewalks and roadway lane configurations, the existing water well east of Salt Lake Avenue would need to be relocated. Existing freight tracks within the San Pedro Subdivision ROW would be relocated to the west to accommodate the proposed station platform and tracks. No parking facility is proposed at this station and that will have serious adverse impacts to our communities. City requests that Metro/P3 partners find alternative parking spaces for LR patrons. Not all of the Huntington Park LR patrons will be from Huntington Park. Some will be from surrounding communities that must drive to use the LR system.	CC-10-26
21.	Alternative 3 – Environmental Concern	Public Works	Railroad crossing at Bell Avenue and Salt Lake Avenue.	Why keep this crossing? Recommend that a Traffic Impact Analysis or Traffic Impact Study be conducted for the use of this crossing.	CC-10-27
22.	Alternative 3 – Environmental Concern	Public Works	Railroad crossing at Otis Avenue and Salt Lake Avenue.	Why keep this crossing? Recommend that a Traffic Impact Analysis or Traffic Impact Study be conducted for the use of this crossing.	CC-10-28
23.	Alternative 3 – Environmental Concern	Public Works	Railroad crossing at Santa Ana Street and Salt Lake Avenue.	Why keep this crossing? Recommend that a Traffic Impact Analysis or Traffic Impact Study be conducted for the use of this crossing.	CC-10-29

24.	Alternative 3 – Environmental Concern	Public Works	On-Street Parking.	Loss of on-street parking itself is not an adverse effect under NEPA, but it can be a local concern: Recommend peak hour (morning, afternoon and evening) study.	CC-10-30
				Adverse effect: on-street parking supply would decrease below the observed utilization. At stations where transit parking demand is projected to exceed the number of parking spaces provided, the unutilized supply of on-street parking was also considered to determine if transit parking demand could be accommodated via available on-street parking. For stations without dedicated transit parking, the travel demand model did not include any parking supply and therefore, parking demand was not projected. For these stations, it is assumed that no transit parking would materialize during operation of the Project as there would not be a dedicated parking supply. However, an analysis of available on-street parking was conducted around these stations to determine if some parking demand could be accommodated if passengers do attempt to drive to these stations. Table 3.8. On-Street Parking Conditions: Proposed Station Location ● Pacific/Randolph – Observed Field Utilization – 60%	CC-10-31

				• Florence/Salt Lake – Observed Field Utilization – 30% Table 3.9. On-Street Parking Conditions: Along the Alignment • Randolph St – Observed Field Utilization – 20% Analysis for Alternative 2 is used for Alternatives 1, 3, 4, and the design options because the vehicle trip demand associated with park-and-ride and kiss-and-ride represents a worst-case scenario. Significant traffic impacts to the community. Request that Metro find alternative parking spaces for LR patrons. Not all of the Huntington Park LR patrons will be from Huntington Park. Some will be from surrounding communities that must drive to use the LR system.	CC-10-31
25.	Alternative 3 – Environmental Concern	Public Works	Removal of 79 on-street spaces.	Removal of off-street parking spaces would not cause the off-street parking supply to decrease below the respective city parking code requirements and, therefore, would not result in an adverse effect: Strip mall north of the Randolph Street and Rita Avenue intersection: 32 lost spaces Strip mall at the southwest corner of State Street and Randolph Street: 4 lost spaces	CC-10-32

				San Antonio Elementary School and Magnet Center on the southeast corner of State Street and Randolph Street: 15 lost spaces Strip mall on the northeast corner of Walnut Street and California Avenue: 13 lost spaces Significant traffic impacts to the community. Request that Metro find alternative parking spaces for LR patrons. Not all of the Huntington Park LR patrons will be from Huntington Park. Some will be from surrounding communities that must drive to use the LR system.	CC-10-32
26.	Alternative 3 – Environmental Concern	Public Works	On-street parking capacity is available to accommodate those who may try to do so without passengers displacing others using the spaces. Therefore, adverse effects from spillover parking would not occur.	We respectfully disagree with this assessment. Significant traffic impacts to the community. Request that Metro find alternative parking spaces for LR patrons. Not all of the Huntington Park LR patrons will be from Huntington Park. Some will be from surrounding communities that must drive to use the LR system.	CC-10-33
27.	Alternative 3 – Environmental Concern	Public Works	Transportation Impact Analysis Report (Appendix D) contains detailed information on the queuing analysis conducted.	While these are not LOS intersection impacts, the effects from vehicle queues would exceed the available vehicle storage from nearby intersections at the following at-grade crossing locations: Florence Avenue: At California Avenue (East) and California Avenue (West) We recommend that a Traffic Impact Analysis or Traffic Impact Study be conducted and further discussed. Metro and its traffic engineering team	CC-10-34

				must meet with City Staff and Traffic Authority to discuss impacts to the circulation element, parking, traffic signal LOS, wait time, street sweeping and trash pick-up schedules, idle time (AQMD) and change in traffic patterns.	CC-10-34
28.	Alternative 3 – Environmental Concern	Public Works	There are 20 intersections where Alternative 3 would have adverse effects associated with the nearby at-grade crossing.	Implementation of the mitigation measures discussed in Section 3.5.2, Alternative 3 would have adverse effects at 11 Huntington Park intersections: 1) No. 31: Randolph St/Alameda St (West) ● 150-foot left turn lanes in all 4 locations 2) No. 35: Randolph St/Santa Fe Ave ● 150-foot left turn lanes 3) No. 36: Randolph St/Malabar St ● 100-foot left turn lanes 4) No. 39: Pacific Blvd/Clarendon Ave ● 50-foot left turn lanes 5) No. 40: Pacific Blvd/Randolph St ● 150-foot left turn lanes in all 4 locations 6) No. 42: Randolph St/Seville Ave ● 150-foot left turn lanes 7) No. 43: Randolph St/Miles Ave ● 150-foot left turn lanes 8) No. 45: Randolph St/State St ● 150-foot left turn lanes (westbound)	CC-10-35

				9) No. 49: Gage Ave/Salt Lake Ave (West) 10) No. 53: Florence Ave/California Ave (West) ● No feasible mitigation options were identified 11) No. 54: Florence Ave/California Ave (East) ● 300-foot n/b left turn lane We recommend that a Traffic Impact Analysis or Traffic Impact Study be conducted and further discussed. Metro and its traffic engineering team must meet with City Staff and Traffic Authority to discuss impacts to the circulation element, parking, traffic signal LOS, wait time, street sweeping and trash pick-up schedules, idle time (AQMD) and change in traffic patterns.	CC-10-35
29.	Alternative 3 – Environmental Concern	Public Works	Mitigation Measures.	Pre-signals and Queue-cutter Signals near grade crossings would be modified. Lane configurations near grade crossings would be modified. Randolph Street moves from one lane in each direction instead of two lanes (current). Review parking pre and post construction. Temporary lane closures and relocations during grade-crossing and median construction; full closures (typically intermittently during nighttime): 1) Randolph/State – 6 months 2) Florence/Salt Lake – 3 months	CC-10-36 CC-10-37 CC-10-38 CC-10-39

				3) Santa Ana/Salt Lake – 3 months	CC-10-39
30.	Alternative 3 – Environmental Concern	Public Works	Mitigation Measures.	Alternative 3 could preempt future development and implementation of the planned Class 1 bicycle path along Salt Lake Avenue: ● Alternative 3 would also require changes to existing and planned bike facilities that could also preempt future development of future bike paths and result in adverse effects to the bicycle facilities. We recommend that a Traffic Impact Analysis or Traffic Impact Study be conducted and further discussed. Metro and its traffic engineering team must meet with City Staff and Traffic Authority to discuss impacts to the circulation element, parking, traffic signal LOS, wait time, street sweeping and trash pick-up schedules, idle time (AQMD) and change in traffic patterns.	CC-10-40
31.	Alternative 3 – Environmental Concern	Public Works	Mitigation Measures.	Must use sound walls to mitigate noise ● Graffiti abatement along Salt Lake Avenue.	CC-10-41
32.	Alternative 3 – Environmental Concern	Public Works	Mitigation Measures.	Removal of parking spaces (east side of the road) at Salt Lake Park ● These spaces are located in the RailRoad Right-of-Way.	CC-10-42

				City staff requires Metro to provide a resolution to the loss of public parking spaces in the general vicinity where spaces are removed due to the project.	CC-10-42
33.	Alternative 3 – Environmental Concern	Public Works	Mitigation Measures.	Physical barriers (e.g., fencing, walls) would be located along sections of the proposed alignment, along the RailRoad Right-of-Way (ROW), parallel to existing street ROWs, or along existing bike trails to create a buffer between the alignment and nearby uses. Graffiti abatement or preventative alternatives required along this stretch of any solid barrier (block wall, etc.).	CC-10-43
34.	Statement of Overriding Considerations and a Mitigation Monitoring Program/Report	City Attorney	Applicable to full Draft EIR	A Statement of Overriding Considerations and a Mitigation Monitoring Program/Report will be required for this project. However, it is not required to be distributed or noticed prior to approval of the project (see. CEQA Guidelines 21081(b), 21081.6). City respectfully requests that the proposed Statement of Overriding Considerations and Mitigation Monitoring Program/Report be provided to the City a reasonable time before approval of the project.	CC-10-44
35.	Draft EIR – Environmental Concern	City Attorney	Pg. 3-105, TRA-21, TRA-22	The proposed mitigation measures do not provide any realistic solutions to the need for more parking such as construction of underground or overhead parking.	CC-10-45

36.	Draft EIR – Environmental Concern	City Attorney	Pg. 3-148, TRA 20, TRA 23	We recommend including hours of construction, such as night-time, to reduce traffic impacts.	CC-10-46
37.	Draft EIR – Environmental Concern	City Attorney	Pg. 4-2, Table 4.0.1, Geographical Extent of Evaluation, Land Use and Development.	Our City recommends that the area of evaluation should be increased from 50 feet to approximately 200 feet.	CC-10-47
38.	Draft EIR – Environmental Concern	City Attorney	Pg. 4-2, Table 4.0.1, Geographical Extent of Evaluation, Noise and Vibration.	Our City recommends having a distance limit such as .25 miles.	CC-10-48
39.	Draft EIR – Environmental Concern	City Attorney	Pg. 4-2, Table 4.0.1, Geographical Extent of Evaluation, Geotechnical/Subsurface/Seismic.	Our City does not believe the 250 feet is adequate. We recommend an increase to .25 miles.	CC-10-49
40.	Draft EIR – Environmental Concern	City Attorney	Pg. 4-5, Sec. 4.1.1.2, Methodology.	Our City recommends increasing the 50-foot area to .25 miles.	CC-10-50
41.	Draft EIR – Environmental Concern	City Attorney	Pg. 4-29, Sec. 4.1.4.2, Mitigation Measure LU-1.	Our City requests adding language to effect that "existing bike paths would be realigned to ensure continuity of bicycle transportation paths as near as possible to existing pathway alignments." Also, add that Metro would pay all costs for re-alignment and any necessary acquisitions caused by re-alignment.	CC-10-51
42.	Draft EIR – Environmental Concern	City Attorney	Pg. 4-428, Sec. 4.11.3, et. seq.	Our City recommends that the Project Design Features be made mandatory mitigation measures.	CC-10-52

43.	Draft EIR – Environmental Concern	City Attorney	Pg. 4-503, Sec. 4.14.3.3 and Pg. 4-511, Sec. 4.14.5.3.	The discussion of loss of paleontological resources discusses maintenance and operation activities, but does not address what may happen during construction activities. Construction impacts are discussed in Sec. 4-19.	CC-10-53
44.	Draft EIR – Environmental Concern	City Attorney	Sec. 4.19, and specifically 4.19.3	This section lumps together various types of impacts, (emissions. Land use, archaeological, historical, etc.) without any rational order, table of contents or index system. This makes the document difficult to read and follow. Construction impacts should be analyzed under each of the Sections such as Land use, Air Quality, Noise and Vibration, etc. The layout of Sec. 4.19, 4.19.3 is disorganized, confusing and does not meet the goal of providing an "information" document.	CC-10-54
45.	Draft EIR – Environmental Concern	City Attorney	Pg. 4-597, Sec. 4.18.42	Our City requests adding a mitigation measure requiring the EPP to contain routes and alternate routes to provide safe response times for emergency vehicles if trains are blocking intersections.	CC-10-55
46.	Draft EIR – Environmental Concern	Police Department	Public Safety	For the WSAB project, we will require Metro to enter into a Memorandum of Understanding (MOU) with our City to designate shared public safety responsibilities for the light-rail stations within our jurisdiction. This MOU should outline staffing, response protocols, funding, video surveillance, homeless services, and any other issues pertaining to public safety for this project. Metro needs to	CC-10-56

				designate funding and/or grants for cities to supplement public safety funding for these stations. Outlines below are specific public safety concerns from our City: Increased public safety and policing demands are direct issues relevant to the environmental impacts the WSAB rail system project will have on the City of Huntington Park and the Huntington Park community. The rail system, train stations, and adjacent vicinity will require 24/7 comprehensive policing to best ensure public safety at all hours of the day and night for the ridership and members of the community. The rail system project will compound the already impacted vehicle traffic volume, lack of parking, pedestrian activity, loitering, nuisance and criminal activity, and presence of homeless individuals along the rail system, train stations and surrounding vicinity, including but not limited to; the surrounding residential, retail and business communities, parking lots, schools, and public parks adjacent to the rail system. The City does not have the staffing or financial capacity to "simply absorb" the public safety and policing demands this rail system will require. Consequently, the City will require funding from Metro to implement and sustain a comprehensive public safety and policing program to meet the environmental impacts associated with public safety caused by this project. A comprehensive public safety	CC-10-56 CC-10-57 CC-10-58

				and policing program will require hiring additional sworn police officers and non-sworn public safety officers, as well as increasing in proportionate percentage police support personnel, including but not limited to; police commanders, police supervisors, police dispatchers, jailers, records clerks, parking enforcement officers, and school crossing guards. Consideration of the above public safety and policing issues must be included in the Draft EIR.	CC-10-58
47.	Draft EIR – Environmental Concern	Parks and Recreations	Pg. 46, Parking relocation.	Per the Draft EIR, parking located at the San Pedro Subdivision Right-of-Way and used by Salt Lake Park would be removed/relocated. Where exactly will this parking be replaced? There needs to be a parking location at or near the Salt Lake Park station. For such a small City to have two stops on this new line, a parking solution is not optional but rather a must.	CC-10-59
48.	Draft EIR – Environmental Concern	Parks and Recreations	Public Safety plan.	The Public Safety plan mentions implementing lighting, surveillance, CCTV and Emergency call boxes. How much physical presence of METRO police and/or Metro Transit Security Guards shall we expect?	CC-10-60
49.	Draft EIR – Environmental Concern	Parks and Recreations	Homelessness.	Having a station near Salt Lake Park will undoubtedly lead to an influx of additional transients.	CC-10-61

				Which resources will METRO allocate to address the increase in homeless issues at Salt Lake Park and the surrounding areas?	CC-10-61
50.	Draft EIR – Environmental Concern	Parks and Recreations	Construction Impact.	Per the Draft EIR, as a result of construction, there will be pollution, odor and dust generated that would exceed the emissions threshold. This is insupportable as there is outright acknowledgement of the health detriment and hazards that will be caused as a result of construction, with not even one remedy or solution being proposed. This is unacceptable as it will have a direct impact on the ability to have outdoor recreational events for families and sporting events on our baseball fields, which are directly across the street from the tracks. It will also have an unhealthy impact on residents. This is also a very serious health concern for our immune compromised and fragile senior citizens as the construction will literally be across the street from our heavily used Senior Center.	CC-10-62
51.	Draft EIR – Environmental Concern	Public Works/ Community Development	Partial or full private parcel takes for the use of temporary construction easements.	After the project is completed, the City requests first right of refusal on all remnant parcels.	CC-10-63
52.	Draft EIR – Environmental Concern	Public Works	Street Parking Permit System	City has implemented a parking App along Pacific Boulevard and the surrounding parking lots in the downtown business corridor. Expanded use of the parking App is part of future implementation discussions.	CC-10-64

				Implementation of a residential parking permit program is currently being discussed.	CC-10-64
53.	Draft EIR – Environmental Concern	Public Works/ Community Development	Grade crossings along light rail stations	Grade crossings along light rail lines must be grade separated for the health and wellness of the community. Florence Avenue and Pacific Boulevard are roadway arterials utilized by the entire Los Angeles County commuter network which traverses from east-west and north-south respectively. City requests a preliminary, planning level assessment of the roadway crossings based upon the future impacts of roadway volumes and train frequencies.	CC-10-65
				Geometric and traffic operational conditions at the grade crossings should be identified. Geometric conditions include the lane configuration on Florence Avenue at Salt Lake Avenue and on Pacific Boulevard at Randolph Street. Traffic operation impacts to the surrounding crossings must be discussed as part of this analysis. Operationally, consideration must include the study of future speeding trains and projected number of roadway vehicles along the major corridors. Accident history and observed risky behavior, recurrent queuing in the vicinity of the crossing, whether there is a background traffic signal progression along the cross street, pedestrian activity, or other unique operational conditions must be analyzed. The study must reference school bus routes and pedestrian routes to school and the use of a high percentage of	CC-10-66

				heavy vehicles or vehicles carrying hazardous substances, or if the crossing is required to be used frequently by emergency response units.	CC-10-66
54.	Draft EIR – Environmental Concern	Public Works	City Infrastructure	Sustainable infrastructure and development policies: Public infrastructure facilities, structures, equipment, services, etc. are essential to the community's quality of life. City's roads, sidewalks, sewer mains, water mains, storm drains, pedestrian lighting, traffic signals, and pedestrian ramps all require capacity enhancements/upgrades. Capacity upgrades and enhancements to the City's infrastructure are required to be focused at grade crossings, adjacent/parallel to the rail lines on Randolph Street and Salt Lake Avenue and half a mile out in each direction (N, S, E & W).	CC-10-67
				Runoff water needs to be treated and stored prior to going back into the storm drain system, which incurs high operating costs. Wet utility infrastructure needs require consistent maintenance, which directly draws from the City general fund. Public infrastructure needed to support the project requires the enhancement of the street network and associated infrastructure for water distribution, sanitary sewer and stormwater management, and new types of infrastructure necessary to achieve community goals and adopted policies for health,	CC-10-68

				safety, quality of life, and pedestrian and non-motorized transportation patrons. .	CC-10-68
55.	Draft EIR – Environmental Concern	Public Works/ Community Development	Land Use: Housing Element Potential Development along proposed stations	Operation of the transit line will attract new development, as demonstrated by almost every line that has been built in LA County. That demand will have several impacts on our existing overcrowded community and its environment. Following are some of the concerns and challenges for the community of Huntington Park: Light Rail influences the City's (in conjunction with the State's increased housing demand) ability of properly generating urban development and land use changes, which include existing regional development trends, land use policies, the availability of land and the physical characteristics of the downtown business corridor. Zoning and infrastructure changes in the vicinity of the light rail transit stations will significantly impact housing through the intensification of development and future growth; which currently is not supportive of the community's focused objectives. Huntington Park is ranked 5th in California out of 644 other cities in Population density (people per square mile).	CC-10-69
				The city is currently at capacity and in need of providing street parking for its residents	CC-10-70

				The City currently occupies number 17 in the list of most densely populated cities in the nation, and any increase in housing will add to the demand of city services at an exponential rate. City has a saturation of rental units (73% renter-occupied units), Overcrowding (19.4% overcrowded units and 20.5 severely overcrowded units)	CC-10-71
				Lack of Open Space, City has only .7 park acres per 1000 residents, the state requires 3 acres per 1000 residents. The City is a 3.003 square mile city with 32 schools and a young population of almost 40% that needs open space for recreational activities and green areas.	CC-10-72
				Housing element impacted by the proximity of light rail in the City. Housing elements need to be further studied and infrastructure capacity/demand impacts directly associated with the addition of light rail must be financed by the project.	CC-10-73
56.	Draft EIR – Environmental Concern	City Council	3% City Local Match	City's potential share is between $10 million and up to $30 million depending on the alternative design and construction and depending on the number of rail stations located within the City and adjacent to the City. City of Huntington Park is a DAC and cannot afford the 3% cost. Alternative fiduciary solutions are required from Metro and stakeholders. METRO's officials and representatives have presented the idea for local municipalities to use the local funding that will be available from "Measure M" to assist with	CC-10-74

				the required local agency match contribution, but the City feels that it would not be just and fair to use the Measure M funding for the next 16 to 30 years to pay for one project and deny the opportunity to utilize the funding to fix and repair other much needed areas in the City as promised by METRO during the Bond Measure campaign. The City opposes any contribution taken from the City's Measure M or Measure R funds to cover this unilateral requirement imposed on the local governments. Metro should continue working with the State and Federal government to provide options and opportunities to resolve this issue. Local governments have faced tough times during this pandemic and covering this percentage will not be possible.	CC-10-74
57.	Draft EIR - Environmental Concerns	Community Development	Construction Impact	The poor quality of our air has been well documented. Thus, it is critical that both the transit system and construction, be implemented in a manner that reduces pollution and enhances our air quality Our City requests that the EIR Study evaluate noise and air impacts and include mitigation measures to evaluate and monitor air and noise impacts during construction and after the transit line is fully operational.	CC-10-75
58.	Draft EIR Environmental Concerns	Community Development	Construction Impact	The proposed train will run adjacent to several historic single family residential neighborhoods, and it may have a significant impact in the neighborhoods. They need to be protected from incursion, noise, visual impacts and vibration. The City requests for the	CC-10-76

				EIR to provide mitigation measures to protect the residential areas.	CC-10-76
59.	Draft EIR Environmental Concerns	Community Development	Connectivity	The City requests for the EIR study to analyze and establish a network of open spaces that connects the neighborhood to all currently existing proposed transit projects, such as the First and Last Mile, Rails to River, ATP, and other proposed transit projects.	CC-10-77
60.	Draft EIR Infrastructure Concerns	Public Works	Utilities	All utility crossings shall be sized and constructed in accordance with engineering Standards of the Huntington Park City Engineer. Capacity enhancements shall meet projected growth figures of various agencies including but not limited to SCAG and FHWA.	CC-10-78
61.	Draft EIR Infrastructure Concerns	Community Development Public Works	Subterranean Station	The City requests that Metro evaluate and consider subterranean stations as opposed to at-grade stations. Subterranean stations will undoubtedly mitigate several environmental impacts caused by the proposed light rail transit line. Benefits of subterranean stations include; improved public safety, uninterrupted vehicular circulation, and noise reduction. Therefore, subterranean stations should be discussed and strongly considered as part of the EIR study.	CC-10-79
62.	Draft EIR Environmental Concerns	Community Development	Landscaping	The City requests for the study to describe all proposed vegetation and landscaping improvements, including the size and height of trees along the Right-of-Way and the proposed train stations locations. The City is also requesting a description of how the	CC-10-80

				vegetation and landscaping will be utilized as a visual and potential sound buffer between the tracks and adjacent residential areas.	CC-10-80
63.	Draft EIR Construction Concerns	Public Works	Traffic Mitigation	Metro shall identify and provide analysis of all before, during and after vehicle, truck, bike and pedestrian counts. Construction traffic/ detours/ closures will require comprehensive detailed traffic analysis and a plan approved by the City prior to any work performed on City streets. Counts will be required for all intersections within a one (1) mile radius of the project main line.	CC-10-81
64.	Draft EIR Environmental Concerns	Community Development	Downtown Specific Plan	The City has completed a Focused General Plan Update, focusing on the Housing, Land Use, and Circulation elements of the General Plan. The update was funded by a Transit Oriented Development (TOD) The TOD grant is designed to spur the adoption of local land use regulations that are supportive of Transit Oriented Development in Los Angeles County. With two (2) public transportation stations proposed in Huntington Park and a close proximity to a potential third station, it is imperative that the design and the environmental study take into account the design and development standards of the existing City's Downtown Specific Plan.	CC-10-82
65.	Draft EIR Construction Concerns	Community Development	Construction Impact on Economic Corridors	The City is concerned about the significant construction impacts along Pacific Boulevard and any other economic corridor that need to be considered in the study. Impacts such as traffic flow, safety, air pollution, business that may lose clients during construction due to street closures, and lack of	CC-10-83

				parking. Pacific Boulevard has been and still is the driving force behind our Retail local economy and the City fear for a big loss of revenue during construction. Any interruption of the business activities along this major corridor or any other will create a financial burden for the City and the local businesses. The City requests for the study to identify mitigation measures to avoid the financial negative effects the project may have; such as job losses and loss of local business revenue.	CC-10-83
				The City is convinced that the community of Huntington Park is concerned about all the above challenges that will take place during construction. The City believes that a Business Interruption Mitigation Fund should be established to assist businesses negatively impacted by the project, especially during the construction phase. Also, coordination with the appropriate local jurisdictions regarding business support should be well established and defined in the environmental document in order to reflect that the problem has been completely addressed.	CC-10-84
66.	Draft EIR Construction Concerns	Public Works	Temporary and permanent parking loss during and after construction	Loss of any parking during construction phasing shall require a comprehensive parking plan and alternative parking on a 1 to 1 basis. Parking loss adjacent to recreational facilities will require parking within the same proximity as approved by the City both during and after construction.	CC-10-85

				The city is currently at capacity and in need of providing more street parking for its residents. The City strongly requests that any parking space needed by the project and utilized by it will have to be strictly replaced in a one to one basis to keep up with the current demand. The City requests for the environmental study to analyze the existing need of parking and the future demand for the project once it is completed. Based on the study, appropriate mitigation measures will address the need to replace parking.	CC-10-85
67.	Draft Construction Concerns	Community Development	Schedule	Our City strongly believes that this project should be completed in one single phase as originally proposed, versus following a phased-out schedule. This will definitely help to mitigate all safety and construction issues in all communities that this project will be impacting.	CC-10-86
68.	Draft EIR Construction Concern	Public Works	Environmental remediation	Geotechnical remediation of all known community dump sites within 500 feet will be required within a standard acceptable by the City and in accordance with environmental regulations of the appropriate governing bodies including LACO Health and CalRecycle.	CC-10-87
69.	Draft EIR Construction Concern	Community Development	2 Traction Power Substations (TPSS) Pacific/Randolph Station Salt Lake/Florence Station	Design indicates that the sites required for these are typically 45’ by 90’ square feet in size and located about every mile along the alignment. On these potential TPSS locations, can these be underground? This approach will certainly minimize the number of parking lost affected at the proposed locations.	CC-10-88

70.	Draft EIR Construction Concern	Community Development	Existing Housing Displacement	The City has heard the concerns from the community about any potential housing displacement and loss of existing residential households. The proposed location of the station at Florence/Salt Lake is close to one of the largest single-home residential areas in our city and the community has many questions in terms of the significant impact that any housing displacement may have in this area.	CC-10-89
71.	Draft EIR Environmental Concern	Community Development	Aesthetics/Lighting	The station areas need to be designed in a manner that connects them to our unique neighborhood and does not create obstacles between the transit and our community resources. Equally important is for the design of the stations to match the existing architectural features found in our affected boulevards. The proposed light rail transit line will run through densely populated residential and commercial uses, including the City's Downtown (Randolph and Pacific). The proposed stations and rail line should be designed in an aesthetically pleasing way in order to maintain the quality of life that is enjoyed by those who live, work, and shop within the City. Lighting and landscape elements should be used to help achieve this goal.	CC-10-90
72.	Draft EIR Environmental Concern	Community Development	Planned Land Use/Rails to River Project	The Randolph Street Bike Trail – Metro has plans for a bike trail on Randolph Street. However, given the size of the proposed rail corridor and the apparent desire to maintain existing traffic and parking, it is unlikely there will be room to add a bike trail.	CC-10-91

				Given the community need and desire for this bicycle and pedestrian facility, the proposed light rail transit line should be planned and built harmoniously with this planned land use. The City requests that the EIR assess any potential impact on this bicycle and pedestrian facility that is strongly supported by the community. If it is determined that the proposed light rail transit line will adversely impact this planned land use, mitigation measures should be proposed in order to maintain the bicycle and pedestrian facility viable.	CC-10-91
73.	Draft EIR Construction Concern	Public Works	Full and Partial ROW Takes - remnant parcels	There are a significant number of residential and commercial property projects being proposed by the project. The loss of economic benefit to the city will be significant. The remnant properties potentially could be fallow and represent a blight on the community. Our City requests first right of refusal on the subject properties that are purchased and left upon completion of the project. In addition, fiscal responsibility of inverse condemnation that will be present to property owners needs to be addressed in advance by the project.	CC-10-92
74.	Draft EIR Environmental Concern	Public Works/ Planning	Zoning changes as a result of new and proposed State laws (I.E. SB9 and 10)	The City will be significantly burdened as a result of unforeseen zoning changes as a result of the project. State legislation allowing for an increase in housing in a “transit corridor” will significantly impact the nature of the community. All utilities and ancillary ROW infrastructure need to be adequately addressed as part of the project for future capacity needs. The ability of the City to meet future requirements will be	CC-10-93

				hindered by the project's infrastructure and be cost prohibitive at a later date.	CC-10-93
75.	Draft EIR Environmental Concern	Public Works	Above ground structures and public safety	At grade crossings pose a significant threat to the public. Pedestrians and vehicle interaction(s) with the significant number of trains (as a result of the project) are likely to create an increase in human fatalities. All rail lines, crossings and interfaces will need to be placed below grade or secured to the satisfaction of the City.	CC-10-94
76.	Draft EIR Environmental Concern	City Administration	Full Support of Alternative 1	City fully supports the proposed light rail line that will be built all the way to Union Station (Alternate 1). There is great importance of a complete project vs a half project because the Federal Transportation Agency is focused on the successful implementation of the WSAB project; Metro/P3/City may qualify for federal funding that can close the gap, including the 3%. Justice 40 is a federal funding program that focuses on disadvantage communities The Path to Achieving Justice40 | The White House. Metro must use their leverage to tap into this funding source or similar funding sources.	CC-10-95
77.	Draft EIR Environmental Concern	City Administration	Public Private Partnership (P3) Status	City requests an update on the available information on the Public Private Partnership (P3) initiative for this project that will support funding.	CC-10-96

City of Huntington Park – CC-10

Comment ID	Response
CC-10-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-10-2	In response to this comment and coordination with the City of Huntington Park after circulation of the Draft EIS/EIR, additional parking surveys were conducted on several streets in the City of Huntington Park during non-holiday weekdays in March and May 2023 on Tuesdays, Wednesdays, and Thursdays between the hours of 6:30 a.m. and 8:30 a.m., 10:00 a.m. and 12:00 p.m., and 11:00 a.m. and 2:00 p.m. As discussed in Chapter 3, Section 3.4.4 of the Draft EIS/EIR, the loss of off-street parking in the City of Huntington Park will not cause the locations to fall below parking code requirements, and adverse parking impacts are not anticipated. Metro will provide compensation as required under the Uniform Act at properties where the Project will require a permanent property acquisition that will result in the removal of off-street parking. The evaluation of on-street parking has been updated since the Draft EIS/EIR, with updated analysis presented in Section 5.4.2 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (previously Appendix D of the Draft EIS/EIR) and summarized in Chapter 3, Section 3.4.4.2 of the Final EIS/EIR. Within the City of Huntington Park, the loss of on-street parking will result in the parking supply to decrease below the observed utilization along segments of Randolph Street, Albany Street, Seville Avenue, and Gage Avenue. However, given the capacity on adjacent streets, it is anticipated that parking demand will be accommodated despite the loss of parking with minimal circulation and there will not be adverse effects. While adverse effects are not anticipated, Mitigation Measure TRA-20 (Parking Mitigation Program [Permanent]) (referred to as Mitigation Measure TRA-22 in the Draft EIS/EIR) will be implemented at locations where implementation of the Locally Preferred Alternative (LPA) results in a permanent, physical loss of on-street parking.
CC-10-3	See response to comment CC-10-2.
CC-10-4	Metro will coordinate with city staff per an executed Master Cooperative Agreement. The Master Cooperative Agreement will provide the City of Huntington Park with the opportunity to review design packages and provide comments. Additionally, Metro has, and continues to, coordinate with the City of Huntington Park as it relates to project design.
CC-10-5	See response to comment CC-10-2.
CC-10-6	As a result of refinements to the LPA after circulation of the Draft EIS/EIR, the parking loss at this location has been avoided, and parking will not be removed at the southwest corner of State Street/Randolph Street. Table 3-19 of the Final EIS/EIR has been updated to remove the loss of parking in this location.
CC-10-7	As a result of refinements to the LPA after circulation of the Draft EIS/EIR, the parking loss at this location has been avoided, and parking will not be removed at San Antonio Elementary School. Table 3.19 of the Final EIS/EIR has been updated.
CC-10-8	The Draft EIS/EIR identified an acquisition on a parcel located at 1920 Randolph Street (APN: 6009-034-008) to support a traction power substation (TPSS) site option. The Draft EIS/EIR included options for various TPSSs, therefore, not all TPSS site locations identified in the Draft EIS/EIR will be required. In response to this comment and coordination with the City of Huntington Park after circulation of the Draft EIS/EIR, the TPSS site option proposed at 1920 Randolph Street in the Draft EIS/EIR is no longer under consideration. As a result of other design refinements, a permanent partial acquisition will be required on parcel APN: 6009-034-008, limited to the southeast corner for an at-grade crossing and a temporary acquisition for a temporary construction easement (TCE).

Comment ID	Response
CC-10-9	The parcel APN: 6310-025-042, located on the northwest corner of State/Randolph Street, was identified in the Draft EIS/EIR to support a TPSS (permanent acquisition) and potentially a construction laydown area (temporary acquisition). In response to this comment and coordination with the City of Huntington Park after circulation of the Draft EIS/EIR, the TPSS site and construction laydown area previously proposed at this location is no longer under consideration. A permanent partial acquisition will be required on the parcel APN: 6310-025-042 to accommodate an at-grade crossing and a temporary acquisition for a TCE, but effects to the parcel have been reduced as a result of coordination with the City.
CC-10-10	After coordination with the City of Huntington Park following circulation of the Draft EIS/EIR, street and sidewalk design has been modified in this area to avoid encroaching on the water well located on the property. The parcel will still be affected by reconstruction of the curb and sidewalk, but the water well will not be disturbed.
CC-10-11	Refer to the response to comment CC-10-4.
CC-10-12	See response to comment CC-10-2.
CC-10-13	Chapter 4, Section 4.19.3.8 of the Draft EIS/EIR, and Section 6.1.2 of the *West Santa Ana Branch Transit Corridor Project Final Biological Resources Impact Analysis Report* have been updated to include a new project measure related to the LA Metro Tree Policy, which addresses trees affected by construction of Metro projects. Under Project Measure BIO PM-3 (Metro Tree Policy), the Project will adhere to the Metro Tree Policy, adopted on October 27, 2022, by the Metro Board of Directors. The policy requires the preparation of a tree protection plan identifying tree protection zones for trees designated for retention. Where tree removal is required, project design will include an approach that either replaces removed trees at a ratio of 2:1 ratio or replaces in-kind with trees that are a minimum size of 36-inch standard box (i.e., young trees with a large root ball). Metro will consult with the City of Huntington Park, in addition to community stakeholders, prior to selecting the appropriate location for planting replacement trees. This measure is included in Chapter 4, Section 4.19.3.8 of the Final EIS/EIR. As discussed in Chapter 4, Section 4.19.3.8 of the Draft EIS/EIR, Mitigation Measure BIO-4 (Protected Trees) requires compliance with applicable local tree protection regulations. Permits will be obtained for the removal of trees defined by Section 7-5.201 of the City of Huntington Park Municipal Code as City trees prior to their removal. Section 7-5.204 states that the Director of Field Services "shall have further authority to impose any conditions on the approval of such permits as are deemed necessary by the Director to fulfill the purpose and intent of this chapter." Replacement for removed City trees will be addressed as a condition of approval on these permits.
CC-10-14	Chapter 4, Section 4.11.1.1 of the Draft EIS/EIR summarizes the federal, state, and local regulations applicable to water resources, including compliance with the National Pollutant Discharge Elimination System (NPDES) and municipal separate storm sewer system (MS4) permits during construction and operation of the Project. Section 4.11.3.1 of the Draft EIS/EIR lists project design features that will be incorporated into the Project for compliance with applicable permits, including LID design standards such as infiltration and biofiltration stormwater treatment controls. With implementation of the design features described in Chapter 4, Section 4.11.3.1 of the Draft EIS/EIR, the Project will not result in adverse effects to water quality; therefore, mitigation is not required. Specific stormwater treatment controls will be determined during the final design phase.

Comment ID	Response
CC-10-15	As shown on sheets A11-001, A13-001, A14-001, A15-001, and A16-001 of the Final Advanced Conceptual Alignment Design Part 5 (Appendix B of the Draft EIS/EIR), the design plans for stations with parking facilities identify accessible paths of travel to station entrances. These accessible paths of travel are along sidewalks and generally avoid vehicle conflicts. In cases when the accessible paths of travel cross a street, there will be high visibility crosswalks and traffic-controlled devices to provide safe passage when pedestrians cross the street and reduce the potential for vehicle/pedestrian conflicts. Per Section 7 of the Metro Rail Design Criteria, signage and wayfinding will be provided in the parking facilities and stations with the following purposes: ▪ To guide passengers through the system in the most efficient and least complicated manner ▪ To provide orientation and information required by the passenger to aid directional decision-making ▪ To provide a safe trip for passengers and to warn of potential system hazards Metro will coordinate with city staff as part of the First/Last Mile (FLM) efforts and per an executed Master Cooperative Agreement.
CC-10-16	At a meeting held on April 28, 2022, the city clarified that the comment should have stated "Obtain approval from Huntington Park..." See response CR-SAF-3 regarding security patrols and enforcement. Security on the WSAB line, including at stations, will be provided by Metro's law enforcement and its contractors. As indicated in Chapter 4, Section 4.18.3.2 under the subheading "Emergency Response Services" in the Draft EIS/EIR, Metro will coordinate with involved fire and police departments to address fire/life safety and security for the proposed alignment, parking facilities, and station areas within their respective jurisdictions. A comprehensive Emergency Preparedness Plan (EPP) that can be integrated with emergency service providers, local jurisdictional emergency response plans, and Metro's existing emergency procedures will be developed for operation of the Project, as required by the Federal Transit Administration (FTA). Metro, in coordination with local jurisdictions, will develop traffic management plans to reduce delays in response times for emergency service providers. Gate operations at at-grade crossings will be configured per California Public Utilities Commission (CPUC) standards as part of the Project and the traffic mitigation measures.
CC-10-17	The two light rail stations along Randolph Street will be designed to include security features such as lighting, surveillance, CCTV, access control, and emergency call boxes to reduce the potential for crime, and stations will be consistent with Metro's Systemwide Station Design Standards, which include safety and security guidance. See response to CR-SAF-1 for additional safety and security features that will be implemented as part of the Project. Modifications to the street configuration along Randolph Street will not introduce security impacts. The Project will include safety features such as crossing gates, pedestrian crossing gates, high-visibility crosswalks, and signage, as shown on sheets CS-101 to CS-105 from the West Santa Ana Branch Final Advanced Conceptual Alignment Design Part 2 (Appendix B to the Draft EIS/EIR). Sheets CS-101 to CS-106 in Appendix B to the Final EIS/EIR show these safety features along Randolph Street. As stated in Chapter 4, Section 4.18.2.3 of the Draft EIS/EIR, Metro will prepare "a comprehensive EPP that can be integrated with emergency service providers, local jurisdictional emergency response plans, and Metro's existing emergency procedures" for operation of the Project. Based on this information, there were no updates to the analysis presented in the Draft EIS/EIR in response to the comment.

Comment ID	Response
CC-10-18	See response CR-SAF-3 regarding Metro's policing services of Metro-owned property. 911 centers across Los Angeles County are equipped with the capability of transferring calls for service through different jurisdictions to ensure the appropriate law enforcement agency responds to the call in a timely manner; this also applies to the transit system. As stated in response to comment CC-10-17, Metro will prepare a comprehensive EPP. In addition, prior to any new line entering revenue service, Metro Emergency Management is required to conduct familiarization training with local public safety agencies to ensure appropriate response to any emergency situation.
CC-10-19	See response to comment CC-10-2. As discussed in Chapter 4, Section 4.16.3.2 of the Draft EIS/EIR, removal of the parking adjacent to Salt Lake Park was not found to result in an adverse effect related to parking or use of Salt Lake Park in the Draft EIS/EIR because other parking will remain available and the general function of Salt Lake Park will not be affected.
CC-10-20	See response to comment CC-10-2. Adverse effects related to on-street and off-street parking were not identified in the City of Huntington Park. See also response CR-TRA-1. The analysis of spillover parking has been updated in the Final EIS/EIR.
CC-10-21	See response to comments CC-10-2 and CC-10-20 regarding parking. Traffic effects from operation of the Project are discussed in response to subsequent comments.
CC-10-22	Metro coordinated with the City of Huntington Park since circulation of the Draft EIS/EIR regarding traffic circulation within the city. As a result of this coordination, the following changes in traffic circulation were made, compared to the Draft EIS/EIR: ▪ Albany Street: Open rather than closed ▪ Santa Fe Avenue: Allow northbound to westbound left turn only ▪ Malabar Street: Closed rather than opened ▪ Rugby Boulevard: Open rather than closed ▪ Pacific Boulevard: Southbound to eastbound left turns only ▪ Miles Avenue: Northbound to westbound left turn only ▪ Arbutus Avenue: Closed rather than opened ▪ State Street: Southbound to eastbound left turn only These changes are reflected in the Final EIS/EIR, the plan set included in Appendix B of the Final EIS/EIR, and corresponding traffic analysis. The updated analysis does not alter the significance conclusions reached in the Draft EIS/EIR. All at-grade crossings have been and will continue to be reviewed by CPUC, and CPUC will issue permits prior to system opening. Safety of grade crossings will continue to be considered as part of this process. Metro has also coordinated with city staff as part of the FLM efforts and per an executed Master Cooperative Agreement. See response CR-SAF-4 regarding pedestrian safety at the at-grade portions of the Project. In addition, many of the at-grade locations along the project alignment incorporate safety features that are identified by the Federal Highway Administration as "Proven Safety Countermeasures" such as: ▪ Medians and pedestrian refuge islands (up to 56 percent reduction in pedestrian crashes) ▪ Flashing lights (up to 47 percent reduction in pedestrian crashes) These safety features are shown in Appendix B of the Draft EIS/EIR and Final EIS/EIR.

Comment ID	Response
CC-10-23	Fencing and/or soundwalls (where applicable) are proposed along at-grade portions of the alignment, in between at-grade crossings, to create a physical barrier and to prevent trespassing if soundwalls identified for noise mitigation are not otherwise present. Fencing or soundwalls terminate near at-grade crossings to allow for pedestrian and/or vehicular traffic; instead, crossing gates are proposed for safe access at these locations. Pedestrians will only be able to cross the light rail transit (LRT) tracks at designated locations near the intersections. As shown on sheets CS-101 to CS-217 in the Final Advanced Conceptual Alignment Design Part 2 (Appendix B to the Draft EIS/EIR), all grade crossings will include pedestrian crossing gates, flashing lights, and signage, such as, "Pedestrian 'Do Not Enter Crossing' and "No Trespassing." These safety features will help to reduce trespassing along Metro right-of-way (ROW). Sheets CS-101 to CS-219 in Appendix B to the Final EIS/EIR show these safety features at grade crossings. In addition, safety features of the Project at the at-grade crossings along Randolph Street and Salt Lake Avenue are shown in the plans, as indicated on Sheets CS-101 to CS-203 in the Final Advanced Conceptual Alignment Design Part 2 (Appendix B to the Draft EIS/EIR).

Comment ID	Response
CC-10-24	Mitigation measures were considered for intersections where the Project will result in an adverse impact under the National Environmental Policy Act based on changes in level-of-service (LOS). Mitigation typically included signalizing intersections that were currently stop-controlled, adding lanes, and/or extending turn bays. Mitigation options also considered secondary impacts (typically acquisition of right-of-way). All feasible mitigation measures were described in Chapter 3, Section 3.5.2.1 of the Draft EIS/EIR. This section presented the mitigation deemed feasible in text, on figures, and in a table format. The table also presented the LOS with mitigation and identified if adverse impacts will remain. Draft EIS/EIR Mitigation Measures TRA-1 and TRA-5 through TRA-12 are proposed within the City of Huntington Park. These measures were described in Table 3.39 and shown on Figure 3-10 in the Draft EIS/EIR. The text of the mitigation measures provides that they are subject to approval of the City of Huntington Park. Additionally, Section 3.5.1 of the Draft EIS/EIR identified project measures, which are measures included in the design of the Project. These measures were assumed as part of the LOS analysis for the Project. Draft EIS/EIR Project Measures TR PM-1 (Pre-signals and Queue-cutter Signals), TR PM-2 (Lane Configurations), TR PM-4 (Randolph Avenue Intersection Modifications), and TR PM-5 (Randolph Avenue Lane Reduction) are within Huntington Park. A field review was held with City of Huntington Park staff on July 19, 2022. At that meeting, city staff and the Metro team visited intersections in the city and discussed potential traffic operations issues and mitigation strategies. Following that meeting, the city requested changes to the at-grade crossings and intersection movements. Refer to the response to comment CC-10-22 for a list of project refinements related to traffic circulation. The City of Huntington Park also requested closure of the Otis Avenue at-grade crossing. However, as discussed with Huntington Park in a subsequent meeting in 2023, the closure of Otis Avenue would result in substantial delays and queues along Salt Lake Avenue and side streets and, therefore, closure was not recommended or included in the Final EIS/EIR. The traffic analysis in Chapter 3 of the Final EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* has been updated to reflect the changes in traffic circulation patterns resulting from closures of at-grade crossings, opening of crossings previously proposed for closure, and restrictions in left turns. Within the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*, the updated LOS for the LPA without mitigation is included in Table 5-4 and a description of mitigation measures and the corresponding LOS is included in Section 8.2.1.1. Refer to Table 3.12 and Tables 3.22 through 3.29 in the Final EIS/EIR for LOS and proposed mitigation. The number of intersections with adverse impacts was reduced from 20 in the Draft EIS/EIR to 19 in the Final EIS/EIR. Project measures proposed within Huntington Park are included in Section 8.1.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* and Section 3.5.1 of the Final EIS/EIR.
CC-10-25	Refer to CR-TRA-1 regarding transit parking. Since the Draft EIS/EIR, the alignment in the La Habra Branch right-of-way has been refined. The LRT tracks will be on the south side of the railroad right-of-way and the freight tracks will be on the north side.
CC-10-26	Refer to CR-TRA-1 regarding transit parking.
CC-10-27	After discussions with the City of Huntington Park in 2022, the City agreed in favor of maintaining the existing open Bell Avenue at-grade crossing. The crossing will remain open with the Project in place.
CC-10-28	Refer to the response to comment CC-10-24 regarding the Otis Avenue at-grade crossing, which remains open in the Final EIS/EIR.

Comment ID	Response
CC-10-29	After discussions with the City of Huntington Park, the City agreed in favor of maintaining the existing open Santa Ana Avenue at-grade crossing. The crossing will remain open with the Project in place.
CC-10-30	Additional parking surveys were conducted on several streets in the City of Huntington Park during non-holiday weekdays in March and May 2023 on Tuesdays, Wednesdays, and Thursdays between the hours of 6:30 a.m. and 8:30 a.m., 10:00 a.m. and 12:00 p.m., and 11:00 a.m. and 2:00 p.m. The survey time periods were determined based on the surrounding land uses and considered parking restrictions on each block. The updated field survey is summarized in Section 4.5.1.2 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* that corresponds to the Final EIS/EIR. Table 4.47 provides an updated summary of the field review of parking availability in the City.
CC-10-31	Refer to CR-TRA-1 regarding transit parking. See also response to comment CC-10-2 regarding the parking evaluation and response to comment CC-10-30 regarding updated parking surveys.
CC-10-32	See responses to comments CC-10-2 and CC-10-7. Table 3.19 in Chapter 3 of the Final EIS/EIR has been updated to reflect changes to off-street parking impacts as a result of refinements to the LPA. As a result of these refinements, the parking loss at the strip mall at the southwest corner of State Street and Randolph Street, San Antonio Elementary School and Magnet Center, and the strip mall on the northeast corner of Walnut Street and California Avenue have been avoided, and parking will not be removed. Parking loss will still be required at the strip mall north of the Randolph Street and Rita Avenue intersection, but the parking loss will not cause the off-street parking supply to decrease below the city parking code requirements at this location.
CC-10-33	See response to comments CC-10-2 and CC-10-20 regarding parking.
CC-10-34	Updates were made to the traffic analysis based on the modifications to traffic circulation described in response to comment CC-10-22, which are reflected in Section 5.1.2 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* and Section 3.4.1.2 of the Final EIS/EIR. The SimTraffic tool considers the effects of queues on adjacent intersections. The queueing analysis was conducted at the at-grade crossings using SimTraffic and summarized in Chapter 5, Table 5.5 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. The analysis focuses on the queuing on the main street. That approach best captured the most critical impact of train crossing queues affecting adjacent intersections. Impacts on the side streets are captured with the LOS analysis, also conducted with SimTraffic. Project impacts on traffic operations were identified at the Florence Avenue/California Avenue East and West intersections. Those findings are provided in Table 3.37 in Section 5.3.2.1 of the Draft EIS/EIR. Mitigation was proposed at California Avenue (East) (TRA-1 (Florence Avenue/California Avenue [East]); however, this measure will not fully mitigate these LOS impacts. No feasible mitigation was identified for California Avenue (West). The results remain unchanged for the Final EIS/EIR. A traffic study was conducted and documented in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. The study considered traffic operations and delay, LOS, circulation, and parking. Air quality was also addressed in the Draft EIS/EIR and technical studies. Metro and its consultant team met with city staff on June 30, 2022, to discuss the City's comments on the traffic analysis. A follow-up field meeting was held on July 19, 2022. Following that meeting, updates were made to the traffic analysis to reflect the changes described in response to comment CC-10-24. Additional meetings regarding project refinements and the impact analyses were also held in 2023.

Comment ID	Response
CC-10-35	The list of mitigation measures in the comment (Nos. 1 to 9 and No. 11) are consistent with what is described in Chapter 3, Section 3.5 of the Draft EIS/EIR. These mitigation measures were determined to be feasible from a design standpoint and will improve traffic operations. Other mitigation measures were considered that would improve traffic operations but were ultimately rejected for design or right-of-way issues. This is the case for No. 10. See also response to CC-10-24. Mitigation measures for traffic-related impacts were updated for the Final EIS/EIR to reflect changes to the roadway network that were made in coordination with the City of Huntington Park, as noted in response to comment CC-10-24. The updated mitigation measures are included Section 8.2.1.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* and Section 3.5.2.1 of the Final EIS/EIR. Regarding the City's request for coordination and preparation of a traffic impact analysis or study, refer to the response to CC-10-34.
CC-10-36	Pre-signals and queue-cutter signals will be implemented and are included as Project Measure TR PM-1 (Pre-signals and Queue-cutter Signals), described in Chapter 3, Section 3.5.1 of the Draft EIS/EIR. These elements are also shown on the grade crossing plans included in Appendix B to the Draft and Final EIS/EIR.
CC-10-37	The comment is accurate.
CC-10-38	Refer to CR-TRA-1 regarding parking surveys conducted prior to operation and response to comment CC-10-30 regarding updated parking surveys in the Final EIS/EIR.
CC-10-39	The durations and locations identified in the comment are consistent with the information presented in the Draft EIS/EIR in Chapter 3, Table 3.51.
CC-10-40	Metro met with the City of Huntington Park staff to discuss the transportation-related items. Alternative 3, which was identified as the LPA, will not remove existing or planned bike facilities on Salt Lake Avenue, as discussed in Section 3.4.3 of the Draft EIS/EIR.

Comment ID	Response
CC-10-41	As discussed in Chapter 4, Section 4.7.4.2 of the Final EIS/EIR, Mitigation Measure NOI-1 (Soundwalls) will require that soundwalls be placed at-grade and at the edge of aerial structures to reduce noise related to LRT vehicles at sensitive receiver locations where moderate and severe impacts have been identified. Mitigation Measure NOI-5 (Freight Track Relocation Soundwalls) (referred to as Mitigation Measure NOI-7 in the Draft EIS/EIR) will require soundwalls to be placed at-grade at specific locations to reduce noise related to freight track relocation. In the City of Huntington Park, soundwalls will be installed on the south side of the La Habra Branch ROW on Randolph Street between Cottage Street and Pacific Boulevard, Rita Avenue and Miles Avenue, Miles Avenue and Boyle Avenue/State Street, and east of Boyle Avenue/State Street. Soundwalls will be installed on the north side of the La Habra Branch ROW on Randolph Street between Santa Fe Avenue and Rugby Avenue, Seville Avenue and Miles Avenue, and East of Miles Avenue and Boyle Avenue/State Street. Soundwalls will also be installed on the east side of the San Pedro Subdivision ROW along Salt Lake Avenue (north of Florence Avenue), and on both sides of the San Pedro Subdivision ROW between Live Oak Street and Santa Ana Street. The soundwalls on Randolph Street were included in response to comments expressing concerns for remaining noise impacts on Randolph Street even after implementation of mitigation measures included in the Draft EIS/EIR. Implementation of soundwalls on Randolph Street was coordinated with the City of Huntington Park in a meeting on March 23, 2023. The soundwalls were also coordinated with the CPUC in a meeting on March 7, 2023. The soundwall locations are shown in Figure 4.7-6 (LRT Noise Impacts Remaining After Mitigation, including Soundwalls (Southeast Los Angeles to City of Huntington Park)) and Figure 4.7-7 (LRT Noise Impacts Remaining After Mitigation, including Soundwalls (City of Huntington Park to City of Cudahy)) in Chapter 4, Section 4.7.4 of the Final EIS/EIR. The soundwalls will be placed at locations where the rail ROW will be adjacent to noise-sensitive uses. In the City of Huntington Park, noise-sensitive uses include residences, schools, and religious facilities. The design of soundwalls will follow Metro Rail Design Criteria or equivalent criteria, which requires the use of landscaping on soundwalls, as appropriate, for graffiti management. Additionally, Metro has a graffiti program that requires removal of graffiti within 24 hours of when it is reported.
CC-10-42	See response to comment CC-10-19.
CC-10-43	Solid barriers along the rail ROW will follow Metro Rail Design Criteria, which requires the use of landscaping, as appropriate, for graffiti management. See response to comment CC-10-41.
CC-10-44	The proposed Statement of Overriding Considerations and Mitigation Monitoring Program/Report will be available for public viewing at least 72 hours before the first Metro committee meeting at which the Final Environmental Impact Report is presented for consideration.
CC-10-45	Refer to CR-TRA-1 regarding transit parking. See also response to comment CC-10-2.
CC-10-46	Chapter 4, Section 4.19 of the Draft EIS/EIR specifies that working hours may vary based on the type of work and to meet local ordinances, but will typically occur on weekdays between 8:00 a.m. 7:00 p.m. and will be minimized during a.m. and p.m. peak periods. Some nighttime construction may be required to minimize impacts to traffic or to businesses.

Comment ID	Response
CC-10-47	As discussed in Chapter 4, Section 4.1.1.2 of the Draft EIS/EIR, "For purposes of the land use analysis, the Affected Area for land use is defined as the area within approximately 50 feet of the Build Alternatives, including the proposed alignment, stations, parking facilities, TPSSs, and MSF site options as these adjacent areas have been identified to be the area of potential impact." A distance of 50 feet was selected because land use compatibility is assessed at the uses immediately adjacent to the project components where direct effects could occur. Section 4.2.1.2 of the Draft EIS/EIR defines the affected area for the communities and neighborhood analysis as "as those areas located 0.25 mile on each side of the proposed alignments, parking facilities, and MSF site options, and 0.5 mile around the proposed station areas as these areas have been identified to be the area of potential impact."
CC-10-48	The study area for the noise analysis was based on guidance provided in the FTA Transit Noise and Vibration Impact Assessment Manual, 2018. As discussed in Section 1.5.1 of the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR) and Table 4-7 in in the FTA manual, 350 feet is the appropriate distance for assessing operational noise impacts from light rail transit. This is the distance at which noise impacts could potentially occur. At greater distances, the effects of light rail transit noise will be reduced and generally overshadowed by other existing noise sources.
CC-10-49	The 250-foot study area is sufficient for the analysis completed for geotechnical, subsurface, and seismic impacts. This analysis considers impacts to the physical ground and subsurface. Excavations deeper than 100 to 120 feet below the ground surface are not anticipated for the LPA. From a geotechnical engineering perspective and considering U.S. Occupational Safety and Health Administration-mandated excavation requirements, potential geology and soils impacts will be limited to an area much less than 250 feet from the edge of any potential excavation.
CC-10-50	See response to comment CC-10-47.
CC-10-51	No existing bicycle facilities will be affected by the LPA in the City of Huntington Park. As discussed in Chapter 3, Section 3.4.3.2 of the Draft EIS/EIR, the existing bicycle paths affected are associated with the Paramount Bike Trail (between Somerset Boulevard and Lakewood Boulevard) and the Bellflower Bicycle Trail (south of Bellflower Boulevard) that are within the Pacific Electric Right-of-Way. The existing bicycle trails will be reconstructed and realigned as part of the LPA. Metro will fund the realignment of these existing bicycle facilities. No property acquisition is required to realign the existing bicycle paths affected by the LPA.
CC-10-52	The project design feature, referred to as "project measures" in the Draft EIS/EIR are not "mitigation measures" as defined by CEQA because they are components of the LPA. The project measures will be implemented as part of the Project.
CC-10-53	Construction impacts for all environmental topics are discussed in Section 4.19 of the Draft and Final EIS/EIR, including paleontological resources.
CC-10-54	The subsections in Section 4.19.3 follow the order of each impact topic previously discussed in Chapter 4 when presenting impacts associated with operation and maintenance.

Comment ID	Response
CC-10-55	Impacts to emergency response services are discussed in Section 4.18 of the Draft EIS/EIR. Draft EIS/EIR Mitigation Measure TRA-20 (Transportation Management Plan) (identified as Mitigation Measure TRA-18 in the Final EIS/EIR) requires development of Transportation Management Plans. These plans will be developed in coordination with fire and police departments and with local jurisdictions to reduce delays in response times for emergency vehicles during construction. As stated in Chapter 4, Section 4.18.4.1 of the Draft EIS/EIR, Project Measure SAF PM-1 (Emergency Access) will require Metro to coordinate access for emergency responders, locations of fire hydrants, and security features with the applicable fire and police departments to address fire, life, safety, and security for the proposed alignment, parking facilities, and station areas within their respective jurisdictions. An additional project or mitigation measure related to the EPP is not required.
CC-10-56	See responses CR-SAF-1 regarding safety and security and CR-SAF-3 regarding security patrols and enforcement. Security on the WSAB line, including at stations, will be provided by Metro's law enforcement and its contractors. The Metro team will continue to work and coordinate with the City on the various agreements needed for the Project
CC-10-57	See responses CR-SAF-1 regarding safety and security and CR-SAF-3 regarding security patrols and enforcement. The City of Huntington Park will not be responsible for public safety for the Project. Metro's law enforcement contractors will provide policing services for the Project. Therefore, the City of Huntington Park will not need to staff or financially support the public safety and policing demands.
CC-10-58	Refer to the response to comment CC-10-2 regarding parking and comments CC-10-22 and CC-10-24 regarding traffic. Refer to the response to comment CC-10-57 regarding safety and security. See responses CR-SAF-1 regarding safety and security, CR-SAF-2 regarding homelessness on the Metro system, and CR-SAF-3 regarding security patrols and enforcement. The City of Huntington Park will not be responsible for public safety for the Project. Metro's law enforcement contractors will provide policing services for the Project. Therefore, the City of Huntington Park will not need to staff or financially support the public safety and policing demands. No new analysis or changes to the Final EIS/EIR is needed.
CC-10-59	See response to comment CC-10-19.
CC-10-60	See response CR-SAF-3 regarding security patrols and enforcement. Metro's Transit Ambassador Program will provide a dedicated staff of diverse, specially trained individuals to offer in-person support to Metro riders. Ambassadors will have a strong visible presence on the Metro system and help customers. The Transit Ambassador Program is an added layer to Metro's overall public safety ecosystem (which includes security, law enforcement, crisis response teams, and homeless outreach) to advance the goal of a safer public transit system.
CC-10-61	See response CR-SAF-2 regarding homelessness on the Metro system. Metro will dedicate resources to address homelessness on the transit system and is working with the County and Los Angeles Homeless Services Authority (LAHSA) to bring more outreach and resources to Metro stations. The City of Huntington Park and LAHSA are responsible for addressing homelessness within the community.

Comment ID	Response
CC-10-62	As described in Chapter 4, Section 4.19.3.5 of the Draft EIS/EIR, Alternative 3 construction activities will not produce emissions exceeding any regional mass daily thresholds. Construction activities will not generate a substantial amount of construction odors or visible dust plumes. Impacts related to public nuisances resulting from dust and/or odors will be less than significant as disclosed in the Draft EIS/EIR. Refer to CR-AQ-1 for a discussion of fugitive dust emissions that will be generated during construction and the best management practices (BMPs) that will be required to control emissions. Regarding public health concerns related to air quality, the analyses included in the Final EIS/EIR determined that the LPA will result in less than significant impacts during both construction and operation. Emissions generated by construction activities will remain below the applicable South Coast Air Quality Management District (SCAQMD) regional and localized screening thresholds, the latter of which were established using a combination of air quality conditions in the project area and simulated emissions scenarios from construction sites to determine that pollutant concentrations will not reach levels capable of affecting nearby community health. Furthermore, construction contractors will be required to comply with the Metro Green Construction Policy, which includes control measures for construction equipment: "(i) all off-road diesel-powered equipment greater than 50 horsepower shall meet Tier 4 off-road emissions standards at a minimum; (ii) all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (CARB), meeting a minimum of emissions reductions that are no less than the equivalent of a Level 3 diesel emissions control strategy as defined by CARB regulations." These provisions of the Green Construction Policy represent some of the most stringent and health-protective standards currently available in the industry. Additionally, fugitive dust control measures consistent with SCAQMD Rule 403 and the Metro Green Construction Policy BMPs will be implemented, resulting in reductions between 36 and 91 percent for various dust source activities. LPA construction sites will not adversely affect nearby sensitive receptors, as determined by the analyses provided in the Final EIS/EIR.
CC-10-63	Refer to the response to comment CC-10-4.
CC-10-64	The comment, which regards the City's parking app, is acknowledged.
CC-10-65	Refer to response CR-GEN-4 regarding grade separations.
CC-10-66	Refer to the response to comments CC-10-24 and CC-10-34 regarding the traffic analysis. Roadway geometry at grade crossings was shown on the Grade Crossing Plans included in Appendix B to the Draft EIS/EIR. The plans have been updated for the Final EIS/EIR to reflect stakeholder coordination undertaken since the Draft EIS/EIR. The updated plans are included as an appendix to the Final EIS/EIR. At-grade crossings have been coordinated with CPUC and coordination will continue throughout design. Safety of the crossings and those traveling through them is of paramount importance to Metro and CPUC. With Mitigation Measure SAF-2 (School District Coordination), Metro will coordinate with school districts and administrators to maintain or modify safe and convenient pedestrian, bicycle, and bus routes to schools.
CC-10-67	Upgrades or enhancements to infrastructure would constitute betterments and are not part of the Purpose and Need of the Project.

Comment ID	Response
CC-10-68	The Project will be subject to federal and state regulations related to water resources, including runoff. The project design features discussed in Chapter 4, Section 4.11.3.1 of the Draft EIS/EIR will minimize impacts to water quality and water resources. These design features include site design and low impact development stormwater BMPs to address impacts to existing drainage systems, including local storm drains and regional flood control facilities. With implementation of the design features described in Chapter 4, Section 4.11.3.1 of the Draft EIS/EIR, the Project will not result in adverse effects to water quality; therefore, mitigation will not be required. Specific stormwater treatment controls will be determined as design advances. Per an executed Master Cooperative Agreement, plans will be provided to the city for review.
CC-10-69	As discussed in Chapter 5, Section 5.2.2.6 of the *West Santa Ana Branch Transit Corridor Project Final Communities and Neighborhoods Impact Analysis Report* (Appendix G of the Draft EIS/EIR), the Project could indirectly affect growth and development in the Affected Area by providing opportunities for transit-oriented development around the proposed stations. Any new development that could be built around the proposed stations would be solely at the discretion and approval of the affected communities, which generally protect residential neighborhoods. City-and Metro-funded transit-oriented development plans are currently being prepared in several of the affected communities. These plans would undergo separate environmental review, and the affected local jurisdictions would be responsible for ensuring that these plans and any new development are consistent with applicable goals, policies, and objectives. In this context, it is anticipated that any potential adverse indirect land use effects would be addressed and mitigated by restrictions imposed by local jurisdictions. New development around the proposed stations would be solely at the discretion and approval of the local jurisdiction and are not part of the Project.
CC-10-70	See response to comment CC-10-2.
CC-10-71	See response to comment CC-10-69. Any development that could occur in the area surrounding stations is under the discretion of the local jurisdiction.
CC-10-72	As discussed in Chapter 4, Section 4.16.3 of the Draft EIS/EIR, the Project will be within street and rail rights-of-way, or within acquired properties, and not on or through parklands and recreational facilities. The Project will not remove open space from the City of Huntington Park. The Project will require the removal/relocation of the off-site parking spaces used by Salt Lake Park; however, other on-site and off-site parking will remain available. In addition, while the Project will require a partial acquisition of the landscaped area at the edge of the San Antonio Elementary School, partial property acquisitions will not change or impact the functionality of the facilities, and the facilities and building will not be disturbed.
CC-10-73	The Project will include the infrastructure required to support operation of the Project, such as stations and TPSSs. The Project cannot use public funds to increase the capacity of utilities beyond what is needed for operation or construction of the Project as such improvements would be considered betterments. Additionally, the Project is a transit project and does not include construction of new housing.
CC-10-74	Refer to the response CR-FIN-1.

Comment ID	Response
CC-10-75	See response to comment CC-10-62. Air quality impacts are discussed in Chapter 4, Sections 4.5 (operations) and 4.19.3.5 (construction) of the Draft and Final EIS/EIR. Noise impacts are discussed in Chapter 4, Sections 4.7 (operation) and 4.19.3.7 (construction) of the Draft and Final EIS/EIR. Project measures and mitigation measures have been identified as applicable. Consistent with the analysis of impacts associated with construction of Alternative 3 in the Draft EIS/EIR, the Final EIS/EIR air quality analyses determined that construction of the LPA will not generate emissions in excess of applicable SCAQMD regional or localized screening thresholds, and impacts will be less than significant. Accordingly, mitigation measures are not required.
CC-10-76	As documented in the *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report—Rev 1* (Appendix W of Draft EIS/EIR), there are no National Register of Historic Places-eligible or listed residential historic districts in the Area of Potential Effect within the City of Huntington Park. The Draft EIS/EIR evaluated operational and construction impacts to cultural resources. Such resources were identified consistent with guidelines established under Section 106 and the California Environmental Quality Act (CEQA). The evaluation is summarized in Sections 4.14 and 4.19.3.14 of the Draft EIS/EIR. As stated in Chapter 4, Section 4.7.4.2 of the Draft EIS/EIR, Mitigation Measures VIB-1 (Ballast Mat or Resilient Rail Fasteners) and VIB-2 (Low Impact Frogs) will be implemented and will minimize vibration impacts. Although vibration impacts will remain at two clusters in the City of Huntington Park, according to FTA guidance, there is a strong probability that after mitigation, groundborne vibration levels at these clusters will be below the FTA impact threshold. Refer to the response to CC-10-41 regarding the noise analysis conducted in Huntington Park. Chapter 4, Section 4.4, of the Draft EIS/EIR provides an analysis of the potential impacts the Project will have on visual and aesthetics. As discussed, project components will not detract from, and will be compatible with, the visual character and quality of the Affected Area. Additionally, Project Measures VA PM-1 (Design Standards), VA PM-2 (Public Art), VA PM-3 (Landscaping), and VA PM-4 (Landscaping Screening), discussed in Section 4.4.4.1 of the Draft EIS/EIR, will be implemented. These project measures will minimize visual effects associated with project components.
CC-10-77	Metro has examined a network of connections to the surrounding community, including open spaces connecting to current and proposed transit and active transportation projects, as part of its FLM planning process. FLM planning efforts focus on specific pedestrian connections within 0.5 mile of stations and connections to bike networks within 3 miles of stations in coordination with cities and key stakeholders. The FLM plan was prepared per FLM guideline procedures. Cities would be responsible for advancing the design, environmental clearance (if needed), construction, and maintenance of these connections.
CC-10-78	Metro will coordinate with city staff per an executed Master Cooperative Agreement. The Project will include the infrastructure required to support operation of the Project. The Project cannot use public funds to increase the capacity of utilities beyond what is needed for operation or construction of the Project as such improvements would be considered betterments and are beyond the scope of the Project Purpose and Need.
CC-10-79	Refer to response CR-GEN-3 regarding the cut-and-cover study. The study included consideration of underground stations in locations where the aerial alignment included a station. The study determined that a cut-and-cover alignment is not a feasible alternative due to the substantial increase in costs. Grade separations at the locations discussed in the cut-and-cover study are also not warranted under Metro Grade Crossing Safety Policy for Light Rail Transit.

Comment ID	Response
CC-10-80	The requirements for landscaping, including as a use for screening, are summarized in Chapter 4, Section 4.4.4.1 of the Draft EIS/EIR. Project Measure VA PM-3 (Landscaping) discussed in Section 4.4.4.1 of the Draft EIS/EIR will be implemented. Landscaping will be installed where there is adequate space along the rail ROWs to improve the aesthetic quality of the transit environment, particularly in residential areas. New landscaping that is installed will be consistent with the Metro Rail Design Criteria and Systemwide Station Design Standards, or equivalent. Examples are also included in the West Santa Ana Branch Urban Design Guide that was developed specifically for the Project in December 2020. Specifics regarding the type and size of vegetation will be identified during later stages of design and provided to the City of Huntington Park for review consistent with the terms of the Master Cooperative Agreement. Landscaping is not used as sound buffers because vegetation and landscaping are not effective at reducing noise levels. Refer to the response to comment CC-10-41 regarding the noise analysis.

Comment ID	Response
CC-10-81	Updated information on construction timeframes has been included in Section 3.7 and Section 4.19 of the Final EIS/EIR. While the Draft and Final EIS/EIR provide general construction durations based on Project goals and milestones, it is not possible at this phase of the Project's planning process to develop a detailed construction schedule. The specific construction schedule will be informed by such factors as the availability of the construction contractor(s) workforce, equipment, and materials; value engineering; and stakeholder coordination. Specific information on timing will be determined by Metro and the construction contractor(s) prior to the start of construction, taking into account these and other related factors. Impacts will be in compliance with the Final EIS/EIR. Many of the project measures and mitigation measures in the Draft EIS/EIR are applicable to the LPA during construction and are not necessarily location specific. However, the Draft EIS/EIR concluded that for Alternative 3, adverse and unmitigated impacts could still occur for certain topics, including traffic during construction. The specific intersections selected for the traffic analysis considered proximity to at-grade crossings where intersections could experience delay due to gate down times, changes to the roadway network, an increase in traffic due to vehicles accessing or departing park-and-ride facilities, and traffic volumes at each intersection. In addition, priority was given to signalized intersections. A specific distance cut-off (e.g., 1 mile) was not used to identify intersections to analyze. Traffic volumes are included in Appendix A of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D to the Draft EIS/EIR) for each of the intersections analyzed in the City of Huntington Park. The LPA volumes include additional traffic due to proposed grade crossing closures. Construction impacts related to vehicles, bikes, and pedestrians are discussed in Chapter 3, Section 3.7 of the Draft EIS/EIR and in detail in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. As noted in response to comment CC-10-22, the locations of open at-grade crossings changed in the City of Huntington Park, which affected construction effects to the roadway network. The total number of proposed grade crossing closures and at-grade crossings that will remain open within the City of Huntington Park is the same between the Draft EIS/EIR and Final EIS/EIR; therefore, construction impacts will be similar to those evaluated in the Draft EIS/EIR. One construction staging area within the City of Huntington Park was also relocated from private property to railroad ROW since the Draft EIS/EIR, thus minimizing the private property acquisitions required for construction within the City. Updated construction impacts related to vehicles, bikes, and pedestrians are discussed in Chapter 3, Section 3.7 of the Final EIS/EIR and in detail in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. Draft EIS/EIR Mitigation Measure TRA-20 (Transportation Management Plan [TMP]) (identified as TRA-18 in the Final EIS/EIR) involves preparation and implementation of a TMP to address construction impacts on transportation facilities. The TMP will be developed and coordinated with the applicable local jurisdictions. Additionally, as part of Mitigation Measure COM-1 (Construction Outreach Plan), Metro will develop a Construction Outreach Plan in coordination with affected communities and businesses.

Comment ID	Response
CC-10-82	Elements of the City of Huntington Park General Plan are considered in Chapter 3, Section 3.4 and analyzed in detail in Chapter 5, Section 5.2.3 in the *West Santa Ana Branch Transit Corridor Project Final Land Use Impact Analysis Report* (Appendix E of the Draft EIS/EIR) and in Chapter 4, Section 4.1.3.2 of the Draft EIS/EIR. The LPA along Randolph Street is located immediately north of the City of Huntington Park's Downtown Specific Plan, which calls for mixed-use development adjacent to the LPA. The design and development standards in the Downtown Specific Plan are not applicable to transit development within the La Habra Branch ROW because the La Habra Branch ROW is located outside of the specific plan area; however, the design of planned streetscape improvements for Randolph Street, as well as the design and development standards, outside of the La Habra Branch ROW are located in the specific plan area. Streetscape improvements and development within the City's Downtown Specific Plan area that are outside of the La Habra Branch ROW are subject to the requirements of the Downtown Specific Plan. The LPA will be consistent with and will support the requirements associated with the Downtown Specific Plan because the LPA promotes pedestrian-friendly uses and design and also supports mixed-use development near transit stations.
CC-10-83	Table 3.51 in Chapter 3 of the Draft EIS/EIR identified anticipated construction-related closures. Closures are not anticipated on Pacific Boulevard during construction. Draft EIS/EIR Mitigation Measures COM-1 (Community Outreach Plan) and TRA-23 (Loss of Parking [Construction]) will maintain access and minimize impacts to affected businesses to the extent feasible. Mitigation Measure COM-1 (Community Outreach Plan) requires development of a Construction Outreach Plan in coordination with affected communities and businesses that will be affected by Metro and its contractors during construction. Mitigation Measure TRA-23 (Loss of Parking [Construction]) will address parking reductions during construction (this measure is referred to as TRA-21 in the Final EIS/EIR). Metro will coordinate with local jurisdictions to address the loss of public parking spaces during construction. Section 4.19.3.5 and 4.19.3.18 in Chapter 4 of the Draft EIS/EIR discuss potential construction-related air quality impacts and safety impacts, respectively. See Common Response CR-AQ-1 regarding fugitive dust emissions during construction and Common Response CR-AQ-2 regarding air quality impact thresholds and guidance, as well as Metro-related policy. Mitigation Measure SAF-3 (Construction Site Measures) discussed in Section 4.19.3.18 aims to address safety and security concerns during construction of the Project and requires security patrols, signage, lighting, and other safety measures at construction areas.
CC-10-84	Mitigation Measure COM-1 from the Draft EIS/EIR requires development of a Construction Outreach Plan to mitigate impacts to businesses near the project alignment during construction. Specifically, it focuses on access to businesses and identifying detours when necessary. Additionally, it discusses specific signage/marketing to support businesses during construction. The Construction Outreach Plan will be developed in coordination with communities and businesses that will be affected by construction. Guidelines and eligibility for Metro's Pilot Business Interruption Fund are set by Metro's Board of Directors. Programs such as the Business Interruption Fund are approved by the Metro Board on a per-project basis and will occur after approval or certification of the Final EIS/EIR and issuance of the Record of Decision and closer to the start of construction.
CC-10-85	Refer to CR-TRA-1 and response to comment CC-10-2. Mitigation Measures TRA-20 (Transportation Management Plans) and TRA-23 (Loss of Parking [Construction]) (referred to as Mitigation Measures TRA-18 and TRA-21, respectively, in the Final EIS/EIR) address parking during construction. TRA-20 requires development of a TMP in coordination with the City to minimize parking impacts during construction. TRA-23 addresses the loss of parking during construction. Metro will coordinate with local jurisdictions to address the temporary loss of parking, which includes allowing additional on-street parking, where appropriate and feasible.

Comment ID	Response
CC-10-86	See response CR-GEN-1 regarding identification of the LPA.
CC-10-87	"Community dump sites," if present, will be identified during the implementation of HAZ PM-5 (Property Assessment – Phase I and II ESAs), described in Chapter 4, Section 4.19.3.10 of the Draft EIS/EIR, which requires assessment of land use history for each parcel/property that will be acquired/used for the Project. If community dump sites require hazardous material remediation, Project Measures HAZ PM-7 (Disposal of Groundwater) and HAZ PM-9 (Contaminated Soil, Soil Vapor, and Groundwater), included in Chapter 4, Section 4.19.3.10 of the Draft EIS/EIR, will be implemented.
CC-10-88	As the WSAB alignment will be at-grade or aerial, the TPSS units will be at-grade. Through coordination with the City, optional TPSS site 13(e) has been removed from consideration in the Final EIS/EIR. As a result, parking will not be removed at the strip mall on the northeast corner of Walnut Street and California Avenue.
CC-10-89	The LPA will result in one residential displacement in the City of Huntington Park associated with the Florence/Salt Lake Station. The property at 2664 Randolph Street (APN: 6320-022-008) will result in a full acquisition to accommodate modifications for an at-grade crossing near the station. The affected parcel is a multi-family unit that will impact 8 residential units and affect approximately 31 residents. The LPA will require partial acquisitions on four parcels near the Florence/Salt Lake Station to accommodate grade crossing improvements and a TPSS, but these partial acquisitions will not result in residential displacements. See response CR-DIS-1 regarding compliance with the Uniform Act and California Relocation Act.
CC-10-90	As discussed in Chapter 4, Section 4.4.3.2 of the Draft EIS/EIR, station areas are designed to be sensitive to the specific urban context. Stations will be designed to be consistent with Metro's Systemwide Station Design Standards, which have elements of consistent features and variability to tie the station area to the visual character and identity of the surrounding community, including public art and landscaping. Metro Rail Design Criteria requires that stations be sited and arranged to appropriately relate to the specific urban context of each station. Metro Rail Design Criteria also requires that sustainable landscaping be provided for stations that reflects the character and identity of the existing neighborhood and is responsive to and complimentary with station architecture, art, signage, graphics and lighting design. Landscaping will be installed where there is adequate space along the rail ROWs to improve the aesthetic quality of the transit environment, particularly in residential areas. The Metro Rail Design Criteria requires that soundwalls be landscaped, as appropriate. Landscaping on soundwalls can be used to soften the view and enhance the aesthetics of the walls, if space permits. The WSAB Urban Design Guide discusses landscape opportunities at stations, if space permits, that provide opportunities for city-specific identity.

Comment ID	Response
CC-10-91	The Draft EIS/EIR evaluated potential impacts to land use and recreational facilities (including bike trails) based on the existing baseline (2017, when the Notice of Preparation was released) and adopted land use and bicycle master plans. The analysis considered the Class I bike trail along Randolph Street and Salt Lake Avenue that is proposed in the City of Huntington Park *Bicycle Transportation Master Plan*. The Draft EIS/EIR concluded that the Project will have an adverse effect due to the Project's inconsistency with local jurisdictions' bicycle plans. As discussed in Chapter 4, Section 4.1.3 of the Draft EIS/EIR, the Project could preempt or obstruct future development and implementation of planned bike paths identified in the City's *Bicycle Transportation Master Plan*. Mitigation Measure LU-1 (Consistency with Bike Plans) is provided to minimize the preemption of future development, goals, and plans for bicycle facilities within each affected jurisdiction. As part of this effort, Metro, as appropriate, will support preparation of amended language for each affected bicycle plan demonstrating that planned bicycle facilities could still achieve an individual city's mobility and connectivity goals. At the time of the Draft EIS/EIR, the Rail to Rail/River Active Transportation (Segment B) Project was still in the initial design phase. In March 2021, the Metro Board approved the first round of grants from a new funding source: Metro Active Transport, Transit and First/Last Mile (MAT) program. The MAT program includes funding for the Rail to Rail/River Active Transportation (Segment B) Project in the Randolph Street corridor. As of 2022, the Rail to Rail/River Active Transportation (Segment B) Project is evaluating new alternative concepts to accommodate the LPA in this corridor. The Metro project teams are currently discussing potential design concepts.
CC-10-92	The WSAB Project is a transit project that includes infrastructure needed to support operation of the LPA (e.g., TPSSs, a maintenance and storage facility). The Project does not include construction of new residential or commercial properties. Refer to the response to comment CC-10-4. Metro has coordinated extensively with the City on TPSS locations and construction laydown areas. The locations have been refined as a result of this coordination. Updated information on acquisitions and displacements is provided in Chapter 4, Section 4.3 and in Appendix B of the Final EIS/EIR. Metro will continue coordination with the City as design advances.
CC-10-93	Refer to comment CC-10-69 and CC-10-73.
CC-10-94	Refer to the response to comment CC-10-22 regarding changes in traffic circulation made in coordination with the City of Huntington Park. Refer to response CR-GEN-4 regarding grade separation. Below-grade crossings are not proposed as part of the Project. As indicated in Chapter 4, Section 4.18.3.2 under the subheading "Motorist, Pedestrian, and Bicyclist Safety" of the Draft EIS/EIR, all at-grade crossings have been and will continue to be reviewed by CPUC, and CPUC will issue permits prior to system opening. The safety of grade crossings will continue to be considered as part of this process. Refer also to response CR-SAF-4.
CC-10-95	Refer to response CR-FIN-1.
CC-10-96	Staff has evaluated and determined that Construction Manager/General Contractor is an optimal contract model for the utilities, freight, and grade crossing construction scopes while continuing to look at different alternative delivery models, including a potential Design-Build-Finance-Operate-Maintain (DBFOM) Public-Private-Partnership (P3) to deliver the LRT scope. While Metro is currently not in the position to confirm the certainty of a specific procurement model, staff is continuing to advance key components in the Advanced Preliminary Engineering scope, which will help the agency make an informed choice on the best delivery model for the LRT scope. Staff anticipates the completion of the evaluation by the spring/summer of 2024.

City of Maywood

From: Jennifer Vasquez <Jennifer.Vasquez@cityofmaywood.org>
Sent: Tuesday, September 28, 2021 8:55 AM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Ortega, Kimberly <kortega@bos.lacounty.gov>; Ricardo Lara <Ricardo.Lara@cityofmaywood.org>; Jennifer Vasquez <Jennifer.Vasquez@cityofmaywood.org>; Steve Fowler <steve.fowler@cityofmaywood.org>
Subject: City of Maywood - WSAB Transit Corridor Draft EIS/EIR Comments

Good morning Meghna. Please find attached the City of Maywood's comments. If you have any questions please let me know.

CC-9-1

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September 21, 2021

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

Re: Comments West Santa Ana Branch Transit Corridor Draft Environmental/Environmental Impact Report

Ms. Khanna,

The City of Maywood has reviewed the West Santa Ana Branch (WSAB) Transit Corridor Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). The City of Maywood supports the project and recommends the selection of **Alternative 1** (Los Angeles Union Station to Pioneer Station) and **Design Option 2** (Addition of Little Tokyo Station). We also have reviewed the recommendations and comments of Eco-Rapid Transit and concur with their analysis of the WSAB Draft EIR/EIS. CC-9-2

For our communities, this is also a question of fairness and equity. As a city consisting of Environmental Justice communities that are adversely impacted by environmental and socioeconomic factors which affect the health, environment and quality of life of the local resident on a regular basis, we expect to be treated fairly and given the same consideration as other Metro projects serving other more affluent areas of Los Angeles County. We ask that Metro not only build the WSAB transit corridor but also help us with projects to improve connectivity from our city to the WSAB stations. We also recognize the importance of planning and managing WSAB construction, asking Metro to work with us to reduce potential construction impacts. CC-9-3 CC-9-4

The City of Maywood has been an active participant in the development of the WSAB Transit Corridor. We have densities that rival Manhattan and a significant transit dependent population that will be users of the WSAB transit project. CC-9-5

- Protect the communities and their sensitive land uses from Potential Significant Environmental Impacts
- Maximize Economic and Community Development opportunities and not preclude them by construction design CC-9-6
- Maximize opportunities for current local businesses and residents to thrive and not be displaced
- Recognize the real impacts and create, implement and monitor mitigation measures that effectively reduce potential adverse impacts to a level of insignificance during construction and following the project completion CC-9-7

- Minimize construction impacts including, but not limited to, traffic impacts associated with the diversion of tractor trailers and passenger vehicles onto secondary arterial and residential streets as well as additional construction impacts discussed below CC-9-8
- Plan for Safety and Security of system during project construction, anticipated future development surrounding the route, and operations through the deployment of video technology at station locations used to supplement local law enforcement CC-9-9
- Minimize Noise, Vibrations and the generation of particulate matter from constriction and brake dust for all sensitive land uses, receptors and businesses with sensitive receptivity CC-9-10
- Analyze housing, community development and recreational opportunities at staging and parking sites for the project CC-9-11
- Promote and provide connections to other modes of transportation along the route including bike and pedestrian trails as identified in local bike plans and existing walking trails and providing adequate parking for residents and workers connecting to transit CC-9-12
- Analyze potential climate adaptation strategies that promote compatibility of the project with climate change over time CC-9-13
- Provide adequate parking to support station location on site and/by way of satellite parking structures supporting both transit and local businesses. CC-9-14

As an environmental justice community located within walking and bicycling distance of the corridor, Maywood should be included in all analysis as identified in the WSAB Transit Corridor Study Area map and the analysis in pages 1-4, 1-6 and 1-7. The EIR/EIS needs to include connectivity from the WSAB stations to Maywood. Maywood needs to be included in first mile/last mile analysis as described in the FTA/Metro/Eco-Rapid Transit/South Gate TOD SIP. It is critical that Maywood be included in all the environmental justice analysis so we benefit from the WSAB project and avoid, minimize or mitigate disproportionally high and adverse human health and environmental effects, including social and economic effects on minority populations and low-income populations. Doing so will help prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations in Maywood. CC-9-15 CC-9-16

The following are specific comments by Section and Page.

Executive Summary CC-9-17

S-3 – Maywood supports Alternative 1 (Los Angeles to Pioneer Station) and Design Option 2 (Addition of Little Tokyo Station)

Purpose and Need

1-3 Maywood concurs with Metro's assessment regarding project need. The corridor has: CC-9-18

- High population and employment densities
- High number of transit dependents
- Environmental justice communities along most of the corridor from Little Tokyo through most of Gateway Cities.
- Significant goods movement activities along the entire corridor
- Significant increases expected in travel demand
- Operates with a constrained freeway and arterial system
- Limited travel options

- Limited connections to the Metro and Regional Rail System
- Limited Transit investment

Page 1-4 Maywood concurs with Metro's Project Goals:

- Goal 1: Provide Mobility Improvements
- Goal 2: Support Local and Regional Lan Use Plans and Policies
- Goal 3: Minimize Environmental Impacts
- Goal 4: Improve Cost Effectiveness and Financial Feasibility
- Goal 5: Promote Equity

CC-9-18

Alternatives Considered/Project Description

No specific comments

Transportation

Page 3-73 Maywood residents will need to have an option of parking at the Pacific/Randolph and Florence/Salt Lake stations.

CC-9-19

Page 3-78 The statement that there will be no parking spillover because no transit parking is provided does not make sense. It seems that Maywood residents will use on-street parking at the Pacific/Randolph and Florence/Salt Lake stations. It is possible that the proposed NextGen bus improvements along Atlantic and Florence may reduce the need for some commuter parking. NextGen is important to provide transit connectivity to the WSAB.

CC-9-20

Affected Environment and Environmental Consequences

Page 4-11 – WSAB provides important access to jobs and institutional/public facilities, medical facilities and recreational uses.

CC-9-21

Page 4-17 – Maywood worked with Eco-Rapid Transit and Metro to develop the transit-oriented development strategic implementation plan (TOD SIP). Implementation of the TOD SIP in the corridor can improve TOD opportunities at the WSAB stations and selected key transit locations in our communities. Metro needs to consider the potential of TOD at key activity centers. For example, TOD could be a valuable tool to enhance economic opportunities at key locations in Maywood.

CC-9-22

Pages 4-41, 4-44 and 4-47: Analysis of impacts to access and mobility, and community character at the Pacific/Randolph and Florence/Salt Lake stations are important for Maywood residents and businesses. These stations need pedestrian amenities such as wide and comfortable sidewalks, and existing street trees. Provision of minimum requirements and clearances for pedestrian access will not suffice in station areas, included and areas of existing high pedestrian volumes. Preservation and enhancement of existing pedestrian amenities will need to be prioritized and must be expanded beyond the station areas to provide connectivity for our community. Metro needs to include Maywood to ensure connectivity and best-in-practice strategies for first- and last-mile improvements.

CC-9-23

Page 4-150 – Sound Walls in the Pacific/Randolph and Florence/Salt Lake Station Areas. The Huntington Park Bicycle Master Plan includes a proposed Class 1 Bike Path along the ROW on Salt Lake Avenue that would create additional first/last mile connections to the Florence/Salt Lake station from the surrounding residential communities. Constructing 8-foot-tall sound walls on both sides along some sections of the rail ROW per Metro's current design would create an unsafe condition for a future Class

CC-9-24

1 bike path that will be visually cut-off from the surrounding development. Can the location, extents, and design considerations for the proposed sound walls along Salt Lake Avenue be reexamined to facilitate options for safe bike connectivity along this corridor? Additionally, the design of the sound walls disconnects the neighborhoods and create an unsafe environment and potential blighting influence. CC-9-24

Page 4-154 – Image 4.4-7 in the conceptual rendering indicates three sets of fences separating both the Light Rail line and the freight rail line in the proposed configuration (the existing condition with the freight rail does not have a fence currently). A single fence designed to maximize visual connections across both sides of the street could suffice to prevent pedestrians from trying to cross the tracks and enhance public safety, while too many fences will potentially create a hostile and unwelcoming urban environment. The fences used, should be designed to encourage, connectivity of the neighborhoods and utilize landscape design to lower sound and lessen environmental impacts. CC-9-25

Page 4-193 – We recommend the inclusion of local artists from the impacted communities. CC-9-26

Page 4-525 to 4-535 – Access to parklands and recreational facilities are important in the WSAB corridor. Access to the Los Angeles River and River LA project is more than a bicycle facility and provides connections from Maywood to the WSAB station areas. It is also an important future parkland, cultural center and recreational facility.

Page 4-559 – The local government agencies need revenue to support local services, like public safety, the cost of which will only increase for communities with stations. The impact of the 3% local share required by Metro puts an unfair burden on our environmental justice communities. CC-9-27

Page 4-561 - Direct local hiring to fill transit jobs and indirectly as transit workers spend their earnings can only be realized if Metro commits to these measures. CC-9-28

Page 4-565, Table 4.17.5 – It seems that the General Fund Revenues should be higher in Alternative 1 and 2 than in Alternative 3 and 4 because of the access to Downtown Los Angeles and other regional destinations. CC-9-29

Page 4-571 – Safety and security is important for the entire line. A successful safety and security program must be a partnership between Metro, local jurisdictions, businesses and residents. CC-9-30

Page 4-631 - Impacts to businesses during construction are more significant than can be addressed by the Community Outreach Plan. There is no discussion of developing programs that meet the businesses needs or mitigate losses after meeting with the owners. More is needed than marketing. CC-9-31

Page 4-853 - The city of Maywood should be included in the Environmental Justice analysis. Maywood needs to be included in all aspects of environmental review and analysis including the category of Environmental Justice. Connections between Maywood and the station areas need to be analyzed and included in the design for the project. CC-9-32

Page 4-866, figure 4.22-4 – Maywood should be included in this map. They both have a significant low-income population. CC-9-33

Section 4(f) Evaluation

The protections afforded under the Section 4(f) evaluation have been in many cases underestimated or are in error. Metro needs to reevaluate its analysis of historic resources in the project area. CC-9-34

Metro also needs to ensure that the project leaves publicly owned assets in a better condition than prior to the project. This is critical in our communities which suffer from a lack of public assets. CC-9-34

Evaluation of Alternatives

Page 6-6 – Maywood believes that there should be greater economic and community benefits if the line goes to Downtown Los Angeles (Alternative 1 and 2) rather than stopping at Slauson (Alternative 3). CC-9-35

Public Outreach, Agency Consultation and Coordination

Page 7-12 – The City of Maywood is also part of the Gateway Cities City Manager TAC and has attended their meetings. CC-9-36

The City of Maywood appreciates the efforts of Metro and is in full support of the development of the West Santa Ana Branch light rail transit project. We will continue to work with staff on the design, construction and mitigation of this project. We look forward to riding on the West Santa Ana Branch light rail line. CC-9-37

Sincerely,

Ricardo Lara
Mayor
City of Maywood

City of Maywood – CC-9

Comment ID	Response
CC-9-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-9-2	See response CR-GEN-1 regarding identification of the Locally Preferred Alternative (LPA) and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo. Responses to the comment submission received from Eco-Rapid Transit are included in the Improvement District and Joint Powers Authority section.
CC-9-3	See response CR-EJ-1 regarding the approach and guidance used for the Environmental Justice (EJ) analysis and the identification of EJ communities. The analysis follows FTA direction on EJ analysis. The EJ Affected Area consists of the Cities of Los Angeles (including the Central City North, Central City, and Southeast Los Angeles communities), Vernon, Huntington Park, Bell, Cudahy, South Gate, Downey, Paramount, Bellflower, Artesia, and Cerritos, and the unincorporated Florence-Firestone community of LA County. The City of Maywood is outside of the EJ Affected Area and is not included in the EJ analysis. Metro coordinated extensively with the cities, stakeholders, and the general public during preparation of the Draft EIS/EIR and Final EIS/EIR. Metro understands the importance of this Project to the Gateway Cities and will continue to coordinate with the cities, stakeholders, and general public throughout the planning process.
CC-9-4	Construction activities for the Project will not occur within the City of Maywood boundaries. Construction effects within the City of Maywood would be limited to construction truck traffic and other potential vicinity impacts.
CC-9-5	The Draft EIS/EIR described potential adverse environmental impacts that may occur as a result of the Project and proposed project measures and mitigation measures to avoid, minimize, or reduce impacts to communities and neighborhoods. As discussed in Chapter 4, Section 4.2.1.2 of the Draft EIS/EIR, the Affected Area for the communities and neighborhood analysis is defined as "as those areas located 0.25 mile on each side of the proposed alignments, parking facilities, and maintenance and storage facility (MSF) site options, and 0.5 mile around the proposed station areas as these areas have been identified to be the area of potential impact." The City of Maywood lies outside of the directly affected area.
CC-9-6	Chapter 4, Section 4.17.3.2 of the Final EIS/EIR and Section 4.2 of the *West Santa Ana Branch Transit Corridor Project Final Economic and Fiscal Impact Analysis Report* (previously Appendix CC of the Draft EIS/EIR) have been updated since the Draft EIS/EIR to include discussion of Metro's Joint Development program. Through the Joint Development program, Metro works with the community and local regulatory agencies to identify the kind of development and related infrastructure that can help create transit-oriented communities and promote positive impacts for the community.
CC-9-7	Refer to the response to comments CC-9-4 and CC-9-5.

Comment ID	Response
CC-9-8	Mitigation Measure TRA-20 (Transportation Management Plan [TMP]) (identified as TRA-18 in the Final EIS/EIR), described in Chapter 3, Section 3.7.3.8 of the Draft EIS/EIR, will be implemented to address potential impacts from construction activities on vehicular, transit, pedestrian, and bicycle access and mobility, including, but not limited to, temporary lane/roadway, sidewalk, bicycle facility, and freeway ramp closures; detours; increases in traffic volumes (including regular traffic and construction traffic, construction equipment, materials delivery vehicles, waste/haul vehicles, and employee commutes); construction parking; and emergency services (e.g., fire, police, ambulances). TMPs are a proven strategy for minimizing potential transportation impacts through and around construction zones during construction. The TMP will be developed and coordinated with the applicable, local jurisdictions to determine the most appropriate traffic management approach.
CC-9-9	See responses CR-SAF-1 and CR-SAF-3 regarding safety and security along the project alignment. As stated in Chapter 4, Section 4.19.3.18 of the Draft EIS/EIR, "the potential for crime during construction is primarily related to construction equipment and staging areas that are not adequately secured. To reduce potential impacts, construction sites will include security features such as CCTV, on-site guards and security teams, and perimeter fencing to prohibit unauthorized individuals from accessing the area." All at-grade construction sites, including entrances, portals, staging and storage areas, and active construction sites, that interface with public ROW will provide the security features described above. However, crime from intentional acts against people and facilities cannot be completely eliminated. Mitigation Measures COM-1 (Construction Outreach Plan) and SAF-3 (Construction Site Measures) aim to address safety and security concerns during construction of the Project. COM-1 requires development of a construction outreach plan to notify communities and businesses of detour routes, maintain access to community assets and businesses, and install signage/barriers to keep people from accessing the construction area. SAF-3 (Construction Site Measures) requires security patrols, signage, lighting, and other safety measures at construction areas. CCTV is also required at all stations and in trains. With implementation of Mitigation Measures SAF-3 (Construction Site Measures) and COM-1 (Construction Outreach Plan), the Project will not result in adverse effects related to safety and security during the construction phase. These measures are described in Chapter 4, Section 4.19.3.2 (COM-1) and 4.19.3.18 (SAF-3) of the Draft EIS/EIR. Anticipation of future development along the project alignment is speculative and beyond the scope of the Project. Therefore, the item regarding future development has been noted.
CC-9-10	See response CR-NOI-2 regarding measures to minimize construction-related noise and vibration. Per Final EIS/EIR Mitigation Measures NOI-6 (Noise Control Plan) (referred to as Mitigation Measure NOI-8 in the Draft EIS/EIR) and VIB-3 (Vibration Control Plan), the contractor will be required to develop noise and vibration control plans with location-and process-specific measures to limit noise and vibration generated during construction. Measures to minimize particulate matter generation during construction are discussed in Section 4.19.3.5 of the Draft EIS/EIR and include adhering to the provisions of the Metro Green Construction Policy and employing best management practices in accordance with the South Coast Air Quality Management District Rule 402. Brake dust generated by on-road motor vehicles in the region will be reduced with implementation of the Project, as it is proportional to the vehicle miles traveled (VMT) in the region. Table 3.49 in Chapter 3, Section 3.6.2.2 of the Draft EIS/EIR shows that each Build Alternative would result in lower VMT than the No Build Alternative, resulting in a reduction in the generation of brake dust in the region.

Comment ID	Response
CC-9-11	Metro can only acquire the property needed for project elements. The properties that will be acquired for parking will be used for station parking and other project-related components, such as TPSSs, and will not be developed with housing, community development, and recreational facilities. Although properties that are acquired for construction staging may provide future opportunities for transit-oriented development, other transit-supportive uses, housing, community facilities, and recreational facilities after the LPA is built, any potential development on these acquired sites will be solely at the discretion and approval of the local jurisdictions in which these sites are located. Such development is not part of the Project and would undergo separate reviews and approvals. Additionally, no housing, community facilities, and recreational facilities have been identified for these acquired sites. Thus, it is speculative to analyze the potential environmental effects associated with development of these types of uses.
CC-9-12	Metro examines safe connections to the surrounding community within 3 miles of project stations as part of the FLM plan. FLM planning efforts consider connections to existing, planned, and proposed walk and wheel facilities, including walking trails. Transit parking will be provided at five stations along the LPA alignment and will include sufficient capacity to address parking demand for the LPA.
CC-9-13	The LPA will not interfere with potential adaptation strategies to address regional effects of climate change. Two climate change issues may affect transit lines: flood waters and heat stress. ▪ Flood waters: Chapter 4, Section 4.11.3 of the Draft EIS/EIR states that Alternative 3 would not have a longitudinal encroachment into the floodplain or impact beneficial floodplain values. Alternative 3 would not increase flooding risk by supporting incompatible development within the floodplain. Furthermore, compliance with local and federal floodplain regulations would avoid or minimize impacts to the flood-control facilities. ▪ Heat stress: The LPA will be designed to accommodate high air temperatures. It should be noted that many transit lines throughout the world operate in high heat, desert environments. Furthermore, the Project reduces greenhouse gas (GHG) emissions, as it promotes a clean energy solution to travel and results in reduced auto trips. Metro has also adopted multiple policies and plans that promote climate resiliency and adaptation, such as the Metro Green Construction Policy and the Energy and Conservation Management Plan. The Project will be consistent with these policies and plans as well as the climate adaptability criteria included in the Metro Rail Design Criteria (MRDC). The LPA will be consistent with Metro GHG reduction and conservation plans. It will achieve a net reduction in emissions, as presented in Table 4.6.5 in Chapter 4, Section 4.6 of the Draft EIS/EIR, and enhance the Metro transit system's net displacement of GHG emissions.
CC-9-14	Refer to the response to comment CC-9-12. Chapter 3, Table 3.37 in the Draft EIS/EIR provides information about on-site parking demand and supply that will be provided by the LPA. Satellite parking structures are not required. Provision of parking for local businesses could be undertaken by local jurisdictions but is beyond the Purpose and Need of the Project. Refer also to the response CR-TRA-1.

Comment ID	Response
CC-9-15	The Study Area for the Project encompasses a 2-mile buffer from the four Build Alternative alignments included in the Draft EIS/EIR, which includes the City of Maywood. The Study Area maps and discussions in Chapters 1 and 2 of the Draft EIS/EIR and Final EIS/EIR correctly includes the City of Maywood within this buffer. Current and projected Study Area characteristics within the full 2-mile buffer, such as traffic conditions, transit service and demand, population and employment densities, and travel demand were considered and informed the Project Purpose and Need in Chapter 1. Each individual section of the environmental document defines a specific Affected Area that is appropriate for that particular subject. The extent of the Affected Area for each topic is included in Chapter 4, Table 4.0.1 of the Draft EIS/EIR. See response to comment CC-9-12.The City of Maywood is located within 2 miles of the Project and was included in these planning efforts.
CC-9-16	See response to comment CC-9-3.
CC-9-17	See response to comment CC-9-2. A financially constrained funding plan is currently not available for the extension to LA Union Station north of the Slauson/A Line Station.
CC-9-18	The comment regarding the Project Purpose and Need and goals is noted. See response to comments CC-9-2 and CC-9-17.
CC-9-19	Dedicated transit parking facilities will be provided at five stations along the LPA alignment: Firestone Station, I-105/C Line Station, Paramount/Rosecrans Station, Bellflower Station, and Pioneer Station. Dedicated transit parking will not be provided at the Florence/Salt Lake Station. See response CR-TRA-1 regarding additional transit parking.
CC-9-20	See response CR-TRA-1 regarding spillover parking. The comment regarding NextGen bus improvements and the potential to reduce parking demand at stations is noted.
CC-9-21	The comment correctly highlights the importance of the access to jobs, facilities, and recreational uses that will be provided by the Project. As stated in Chapter 1, Section 1.2.2, of the Draft EIS/EIR, part of the Project's purpose is to "improve access for the densely populated neighborhoods, major employment centers, and other key regional destinations where future growth is forecasted to occur within the Study Area." As noted in the comment, Table 4.1.1 in Chapter 4, Section 4.1.2.1 of the Draft EIS/EIR identifies the land uses that are located within 0.25 mile of the proposed alignments and around the stations, parking facilities, MSF site options, and TPSS sites, which includes institutional/public facilities and open space/recreational facilities. This list presents the context of the surrounding area. The Project will provide improved access to these facilities.

Comment ID	Response
CC-9-22	The Draft EIS/EIR considered the potential for transit-oriented developments (TODs) at station areas. Discussion of possible future changes in the station areas related to TOD is presented in the *West Santa Ana Branch Transit Corridor Project Final Communities and Neighborhoods Impact Analysis Report* (Appendix G of the Draft EIS/EIR) and the *West Santa Ana Branch Transit Corridor Project Final Growth-Inducing Impact Analysis Report* (Appendix DD of the Draft EIS/EIR). As discussed in Chapter 5, Section 5.2 of the *West Santa Ana Branch Transit Corridor Project Final Growth-Inducing Impact Analysis Report*, the potential indirect effects "would include the future planning and development of TODs surrounding the proposed station areas. Metro prepared the West Santa Ana Branch Transit-Oriented Development Strategic Implementation Plan to be used by local jurisdictions as a resource 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. As a toolkit for future planning, the plan does not contain specific plans for TOD development within 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. Regional and local policies encourage TOD planning and development including the intensification of land uses at potential station areas and along the corridor; development of compact communities around a public transit system; alternatives to automobile travel; and planning for residents, visitors, and employees within the vicinity of the areas." The analysis further states that implementation of the LPA could be a catalyst to the TOD planning and development. The Project will be consistent with local jurisdictions' plans to encourage TODs with appropriate residential density along the alignment and within station areas.
CC-9-23	See response to comment CC-9-12. Improvements were identified with community input, then prioritized, and implementation will be based on available funding. The City of Maywood is included in the FLM planning area so would be expected to participate in the FLM Plan development. The West Santa Ana Branch Transit Corridor Urban Design Guide identifies a sample tree and landscape palette for landscaping opportunities at stations. Specific landscape plans have not been developed at this stage of design; however, landscaping plans will be prepared as design advances. Design will also follow the MRDC that embrace opportunities to enhance and complement the urban environment.

Comment ID	Response
CC-9-24	Per Mitigation Measure NOI-1 (Soundwalls), soundwalls will be provided along Salt Lake Avenue to reduce noise related to LRT vehicles at sensitive receiver locations. Mitigation Measures NOI-1 is described in Section 4.7.4.2 of the Final EIS/EIR. The table included with the mitigation measure identifies the placement, height, and length of soundwalls proposed to address noise impacts at sensitive receivers. To effectively reduce noise levels, the soundwalls must be placed as close to the noise source as possible. In addition, the length and height of the soundwalls are designed to meet FTA requirements. There is not enough room to install a Class 1 bicycle path within the rail ROW along Salt Lake Avenue in addition to the soundwalls, freight tracks, and light rail tracks. Any future bicycle paths to be installed along Salt Lake Avenue will need to occur outside of the rail ROW and, thus, will not be affected by the soundwalls. As discussed in Chapter 4, Section 4.1.3.2 of the Draft EIS/EIR, the proposed alignment "could preempt future development and implementation of the planned Class 1 bicycle path along Salt Lake Avenue and the Class I bicycle path north of Rayo Avenue and south of the Los Angeles River, identified in the City of Huntington Park Bicycle Transportation Master Plan, City of Cudahy 2040 General Plan, South Gate Bicycle Transportation Plan, and the City of Bell Bicycle Master Plan. While planned, the bike facilities are unfunded and not scheduled for implementation in local capital improvement budgets/programs." Under Mitigation Measure LU-1 (Consistency with Bike Plans), Metro will continue to coordinate with jurisdictions and local agencies to minimize the preemption of future development, goals, and plans within each jurisdiction. As part of this effort, Metro, as appropriate, will support preparation of amended language for each affected bicycle plan demonstrating that planned bicycle facilities could still achieve an individual city's mobility and connectivity goals. However, because the process to amend bike plans is a local process, which includes public participation, the ultimate outcome and resolution of plan elements cannot be predicted. The design of the soundwalls will follow the MRDC and the West Santa Ana Branch Transit Corridor Project Urban Design Report and Urban Design Guide. Per the MRDC, soundwalls will be landscaped, as appropriate, for graffiti management. Additionally, the Urban Design Guide includes the incorporation of landscaping and/or vines on soundwalls where space and opportunity allow and the design of soundwalls that are sensitive to the area in which they are installed. By following the MRDC and Urban Design Guide, the visual character of the soundwalls will be improved and the design of the soundwalls will not adversely affect the character of the residential neighborhoods or influence blight. Further, the addition of soundwalls in residential areas will not disconnect the neighborhoods or create an unsafe environment. As discussed in Chapter 4, Section 4.2.3.2 of the Draft EIS/EIR and in Section 5.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Communities and Neighborhoods Impact Analysis Report*, where soundwalls are along railroad right-of-way, the soundwalls will prevent informal crossings of railroad tracks, thereby avoiding potential conflicts between pedestrians and LRT vehicles. Residents within the Affected Area for communities and neighborhoods will use grade crossings to access adjacent neighborhoods and nearby community facilities. The use of the grade crossings, rather than crossing through the railroad ROW in between intersections, will enhance safe access and crossings throughout the communities.

Comment ID	Response
CC-9-25	An inter-track fence is required between the freight and LRT tracks. A fence along the ROW is proposed to maximize safety and discourage illegal crossings of the tracks. Specific fencing design will be established at a later phase in design and will be consistent with the MRDC requirements. The WSAB Urban Design Guide includes fencing design and is consistent with Metro's Systemwide Design Standards. As discussed in Table 4.4.6 in Chapter 4, Section 4.4.3.2 of the Draft EIS/EIR, the Affected Area currently has fences or walls along property lines. The proposed fences in the rail ROW will be consistent with and will not degrade the overall visual character and quality of the Affected Area. Fencing will follow the MRDC and the West Santa Ana Branch Transit Corridor Project Urban Design Report and Urban Design Guide. The Urban Design Guide includes fencing that is context sensitive. Additionally, Project Measure VA PM-3 (Landscaping) discussed in Section 4.4.4.1 of the Draft EIS/EIR will be implemented. Landscaping will be installed where there is adequate space along the rail ROWs. New landscaping that is installed will be consistent with the MRDC and Systemwide Station Design Standards, or equivalent.
CC-9-26	The Project will be consistent with Metro's Systemwide Station Design Standards, which has elements of variability to relate the station area to the visual character and identity of the surrounding community, including public art and landscaping. Metro will work closely with local community arts and culture representatives throughout the implementation of the project art program. An art panel, which will include arts professionals connected to the project corridor communities, will make recommendations for the commission of artists.
CC-9-27	See response CR-FIN-1.
CC-9-28	Chapter 4 Section 4.19.3.7 of the Final EIS/EIR and Section 7.3.2 of the *West Santa Ana Branch Transit Corridor Project Final Economic and Fiscal Impact Analysis Report* (previously Appendix CC of the Draft EIS/EIR) have been updated to include a discussion of existing Metro policies and programs that support job creation and workforce development. The Project will comply with these policies and programs, including the project Labor Agreement & Construction Careers Policy and Local Hire Program. These policies and programs encourage construction employment and training opportunities to those who reside in economically disadvantaged areas on Metro construction projects.
CC-9-29	The General Fund revenues were reported for each community in Table 4.17.2 in Chapter 4, Section 4.17.2.2 of the Draft EIS/EIR. The potential impact to each community varied by alternative. For example, Alternatives 1 and 2 would have minor impacts to the City of Los Angeles' General Fund revenues, and Alternatives 3 and 4 would not impact the revenues of Los Angeles.

Comment ID	Response
CC-9-30	See responses CR-SAF-1 and CR-SAF-3 regarding safety and security along the project alignment. As indicated in Chapter 4, Section 4.18.3.2 under the subheading "Emergency Response Service" of the Draft EIS/EIR, Metro will coordinate with involved fire and police departments and prepare "a comprehensive Emergency Preparedness Plan (EPP) that can be integrated with emergency service providers, local jurisdictional emergency response plans." As indicated in Section 5.2.3.1 of the *West Santa Ana Branch Transit Corridor Project Final Safety and Security Impact Analysis Report* (previously Appendix F of the Draft EIS/EIR), Metro conducts outreach and education programs to local businesses and residents to promote safety awareness. Mitigation Measure COM-1 (Construction Outreach Plan) will require Metro to develop a Construction Outreach Plan as part of Metro's Construction Relation & Mitigation Programs in Community Relations in coordination with affected communities and businesses that will be implemented by Metro and its contractors during construction of the Project. With implementation of Mitigation Measure COM-1 (Construction Outreach Plan), Metro will establish a partnership with local jurisdictions, businesses, and residents regarding safety and security.
CC-9-31	Within the City of Maywood, there will be no direct effects to businesses. In jurisdictions where businesses are affected by construction of the LPA, per Mitigation Measure COM-1 (Construction Outreach Plan), Metro will develop a Construction Outreach Plan as part of Metro's Construction Relation & Mitigation Programs in Community Relations in coordination with affected communities and businesses. COM-1 will maintain access, coordinate construction activities to minimize construction impacts, and provide detour and informational signage to businesses and the public to maintain operations during construction.
CC-9-32	See response to comment CC-9-3.
CC-9-33	See response to comment CC-9-3.
CC-9-34	Per the definition of Section 4(f) use provided in Chapter 5, Section 5.1.3 of the Draft EIS/EIR, there will be no Section 4(f) use of any property within the City of Maywood. Chapter 5, Section 5.1.3 of the Draft EIS/EIR defines use of properties that are protected under Section 4(f). The LPA will not incorporate any land within the City of Maywood, whether or not that land is protected under Section 4(f), either temporarily or permanently into transportation use. Furthermore, its proximity impacts will not be so severe at any Section 4(f)-protected property within the City of Maywood that the protected activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired. Non-Metro public assets are treated similarly to private property and any damage sustained during construction would be restored to an equal or better condition.
CC-9-35	See response to comment CC-9-2.
CC-9-36	The comment regarding Technical Advisory Committee (TAC) meetings is acknowledged. Text in Chapter 7 of the Final EIS/EIR has been updated to include City of Maywood attendance at TAC meetings.
CC-9-37	The comment regarding continued coordination is acknowledged. See responses to comments CC-9-2, CC-9-17, and CC-9-18.

City of Paramount

From: Adriana Hermosillo <AHermosillo@paramountcity.com>
Sent: Tuesday, September 28, 2021 3:57 PM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: John Moreno <JMoreno@paramountcity.com>; John Carver <JCarver@paramountcity.com>
Subject: Metro - WSAB EIS/EIR Comments, City of Paramount

Good afternoon Ms. Khanna,

On behalf of City Manager John Moreno, please see the attached letter. A hard copy has been sent via USPS mail.

CC-12-1

Thank you,

ADRIANA HERMOSILLO
Executive Assistant | City of Paramount
16400 Colorado Avenue, Paramount, CA 90723
☎ (562) 220-2221 |✉ ahermosillo@paramountcity.com

September 28, 2021

Ms. Meghna Khanna
Project Manager, Metro
One Gateway Plaza, M/S 99-22-7
Los Angeles, CA 90012

Subject: Review of the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the West Santa Ana Branch Transit Corridor (WSAB) Project.

Thank you for the opportunity for the City of Paramount to respond to the Draft EIS/EIR for the West Santa Ana Branch Transit Corridor (WSAB) Project.

With the certainty of construction of the WSAB project and the passage of Measure M, Paramount has consistently supported the development of the option of Alternative 1 (Los Angeles Union Station to Pioneer Station in Artesia). It would be a disservice to the Paramount community and the region at large and a tremendous missed opportunity for any line short of Union Station. However, understanding skyrocketing construction costs and the immediate availability of funding for this project, the City would support the first phase of the WSAB project, otherwise known as Alternative 3 (Slauson Station to Pioneer Station), with the condition that the Los Angeles County Metropolitan Transportation Authority (Metro) fund and build the remaining phase of the WSAB project to Los Angeles Union Station within a reasonable and specified time frame. We are aware of the fact that Metro has built and/or funded other Light Rail Transit (LRT) lines in phases. Given the significant demand for public transit in the Gateway Cities region, we expect Metro to apply a similar, if not quicker, time frame of completion that was applied to these other LRT lines.

CC-12-2

CC-12-3

We also look forward to working together with Metro and our elected representatives so that we can continue to obtain funding to build this line in an equitable and sustainable manner. In terms of a public vote, communities such as Paramount were some of the strongest supporters of Measures R and M. As much as we support the project, our cities, especially after COVID-19 losses, do not have the financial means to provide Metro's requested 3% local match. The five-year period must be extended, and the contributions

CC-12-4

of prior projects should be included in the calculations. We state this out of a matter of equity, fairness, and the reality of local budget constraints. We ask that Metro work with Paramount and the cities along the project corridor on identifying non-city general funds that can be applied toward the matching funds. CC-12-4

We have arranged our comments to correspond to the sections included in the Draft EIS/EIR.*Section 1.2.2. Need for the Project*

The Draft EIS/EIR indicates that Hawaiian Gardens and Long Beach are included in the study area. We recommend that Figure 1-1, as well as the other related exhibits throughout the document, be corrected to better illustrate the boundaries of the cities and unincorporated areas that comprise the study area. CC-12-5

Section 1.3.1 Study Area Population and Employment

The Draft EIS/EIR cites the high population density of certain cities in the project area. The City of Paramount's population density is 11,260 persons per square mile, which is more than four times than that of the County. The City is also an important employment center within the Gateway Cities as is correctly noted in Exhibit 1-4. The City's employment center is very specialized, well established, and includes aerospace, specialized manufacturing, and other labor-intensive land uses. The daytime population density of Paramount, when including these employment centers, could well exceed those of the other cities noted in the Draft EIS/EIR. This information should be considered in the Draft EIS/EIR. CC-12-6

Section 1.4 Regional Transportation System.

We are concerned that the Draft EIS/EIR (refer to Table 1-3) failed to mention that Paramount Boulevard is a major north-south arterial in the region. What criteria was used to identify those arterial roadways summarized in Table 1-3? The rationale for selecting these arterial roadways should be indicated in the Draft EIS/EIR. The format of the EIS/EIR is confusing in that the transportation and traffic-related issues are included under the discussion of the project rather than as a separate environmental issue. CC-12-7

Section 2. Project Alternatives, Maintenance and Storage Facility Locations. Page 2-16.

The Draft EIS/EIR indicated that "to support the Build Alternatives, a single maintenance storage facility (MSF) for rail cars is required. Two optional sites are under consideration: [the] Paramount MSF site option [and the] Bellflower MSF site option." The City of Paramount is strongly **opposed** to the construction and operation of the Paramount MSF option. This alternative would have displacement impacts on a key commercial area of the City. A number of homes (greater than the number in the Bellflower MSF option) would also be displaced. In addition, the MSF's operation would lead to traffic and noise impacts on Rosecrans Boulevard. Finally, the proposed Bellflower MSF option is environmentally CC-12-8 CC-12-9

superior in that it is located adjacent to the light rail transit (LRT) alignment. While we support the Bellflower MSF option, please recognize this location is Paramount-adjacent. As such, the Bellflower MSF must incorporate the top-of-the-line design features of the Santa Monica Light Rail Maintenance Facility. We will elaborate on our opposition elsewhere in this letter. CC-12-9

Section 2. Project Alternatives, 105/C Freeway Station. Page 2-32

Figure 2-16 included in the Draft EIS/EIR illustrates the I-105C station layout, though it is very difficult to read and understand. We are concerned that our residents may not fully comprehend all of the key elements of the station's construction and operation. These elements would include the following: CC-12-10

1. The I-105/C Line Station would provide a connection with the Metro C (Green) Line via a new station platform in the Metro C (Green) Line alignment within the I-105 freeway median. The I-105/C Line Station would be located at grade within the rail right-of-way (ROW), north of Century Boulevard within the City of South Gate. This station would consist of two side platforms with access at the north and south ends of the station platform. CC-12-11

2. A pedestrian crossing would be located at the northern end of the station platforms with access to the two proposed parking facilities. Access from the southern end of the platform would be provided via a pedestrian walkway to Century Boulevard. To accommodate the station platforms, the existing freight track would be relocated to the west, which would require the demolition of the existing freight bridge and construction of a new freight bridge. We are concerned about nighttime construction noise and any attendant mitigation. We are also concerned about pedestrian security between the platforms and parking areas. CC-12-12 CC-12-13

3. The new station along the existing Metro C (Green) Line would be located within the median of the I-105 freeway within the City of Paramount. The Metro C (Green) Line would be realigned to provide space for the new center platform. This station would be accessed via stairs and/or escalators and elevators from a pedestrian walkway incorporated into the new LRT bridge on the east end and via stairs and elevators from Façade Avenue on the west end of Century Boulevard. The City is opposed to the use of stairs and/or escalators at this location. CC-12-14

4. On the south side of the freeway, the pedestrian bridge would connect to a pedestrian walkway between the San Pedro Subdivision ROW and Arthur Avenue to the east. The existing Façade Avenue overpass bridge and the Arthur Avenue pedestrian bridge would also be reconstructed as two-span structures to accommodate both the WSAB and Metro I-105 Express Lanes projects. Security has been an issue for many of the freeway pedestrian bridges, especially bridges of such a length and narrow design, elsewhere in Southern California. CC-12-15

5. Two parking facility sites, totaling approximately 3.7-acres and accommodating up to 326 parking spaces, would be located on the west and east sides of the I-105/C Line Station platforms along the project alignment north of Century Boulevard. The western parking facility is approximately 1.2 acres with vehicle access via Century Boulevard and Center Street. The eastern parking facility is approximately 2.5 acres with vehicle access via two driveways from Industrial Avenue. Pedestrian pathways between the parking facilities and the station platform would be provided from Century Boulevard and from the north end of the platform to the eastern parking facility. We are concerned about the potential displacement impacts associated with the construction of the two parking areas as well as spillover parking. Traffic and parking impacts at this station, as currently planned, would have significant impacts on the adjacent Paramount neighborhood. CC-12-16

As a result of these significant impacts, the City is requesting that Metro make the I-105-C station into a "transfer station" only. This would eliminate the need for parking facilities and pedestrian ingress/egress to these stations would be eliminated. CC-12-17

Section 2. Project Alternatives, Paramount/Rosecrans Station. Page 2-33

The Draft EIS/EIR indicates the aerial Paramount/Rosecrans station would be within the Pacific Electric (PE) ROW northwest of the intersection of Paramount Boulevard and Rosecrans Avenue, as shown in Figure 2-17 of the Draft EIS/EIR. Street-level access would be provided via a pedestrian walkway along the north side of Rosecrans Avenue to an at-grade plaza where two sets of stairs, two sets of escalators, and two sets of elevators would provide access to the boarding platform and parking facility with up to 490 parking spaces would be located southwest of the Paramount/Rosecrans station adjacent to a utility property. Access to the parking facility would be via two separate driveway connections to Rosecrans Avenue. Pedestrian access between the parking facility and station platform would be via a pedestrian pathway connecting the northern end of the station platform to the eastern corner of the parking facility and the sidewalk along Rosecrans Avenue. The existing at-grade freight tracks would be realigned to the north within the PE ROW to accommodate the station platform and provide access to the World Energy industrial facility based at 14700 Downey Avenue. We are concerned about traffic congestion and pedestrian safety at this station during the peak hour traffic periods. Would there be a potential for queuing onto Rosecrans during the peak traffic periods? CC-12-18

Section 2. Project Alternatives, Paramount/Rosecrans Station. Exhibit 2-17 Page 2-37

The station parking area needs to be clearly labeled as such so our residents and businesses can clearly understand the location and extent of the proposed Paramount station. CC-12-19 Also, please make sure the Final EIS/EIR clearly indicates the proposed relocated freight tracks. The exhibit also is confusing in that it fails to indicate the LRT alignment across Rosecrans Avenue to the proposed Paramount MSF option. CC-12-20

Section 2.5.3 Maintenance and Storage Facilities. Page 2-44 and 2-46

The Paramount MSF site option is a 22-acre rectangular site located in the City of Paramount. The MSF site currently consists of the Paramount Swap Meet, Paramount Drive-in Theatre and its associated parking, and various industrial properties. Vehicular access to the proposed site is currently provided from All America City Way. At full capacity, the MSF would be designed to store up to 80 light rail vehicles (LRVs) and provide over 200 parking spaces for MSF staff. Lead tracks to the MSF site option would enter the site along its western edge approximately 0.3 mile south of the project's mainline track. As we indicated previously, the City of Paramount is strongly opposed to the Paramount MSF option. The Bellflower option is located adjacent to the alignment while the potential Paramount MSF site is located to the south of the alignment approximately 0.3 miles south of the LRT alignment and would require the removal of a number of residences to accommodate the tracks. CC-12-21

We do not agree with the Draft EIR/EIR that the dislocation of the businesses and employees required to accommodate the Paramount MSF option would not be significant. As indicated previously, the Draft EIS/EIR indicated that the swap meet and theater would not likely be able to relocate in the City. The analysis must indicate loss of revenue to the City and how the property owners and employees will be compensated. For example, the Paramount Swap Meet that will be displaced by the proposed Paramount MSF option currently houses more than 700 vendors. These small businesses provide both jobs and sales tax, and many vendors are Paramount residents. CC-12-22

As indicated above, the area that is being considered for the Paramount MSF option includes the existing Paramount Swap Meet as well as other retail, industrial, and institutional uses. Due to proximity to multiple arterial corridors, the City's Clearwater East Specific Plan is proposed as a multi-purpose redevelopment district supporting multiple land uses. Specific land use recommendations for the Specific Plan area includes residential, light industrial, office/business park, commercial, and public/quasi-public uses. This development site will play a vital role in the growth and redevelopment of this area of the city. In conjunction with the construction of the proposed Rosecrans/ Paramount station, the development looks to enhance a positive image of quality development and an increase in daytime population through residential and employment generation development. The intent of the suggested uses is to not only provide new residential that will support and enhance ridership on the Metro light rail line, but to also increase city revenues through property tax and sales tax revenues that will be realized with new development. The proposed uses include the following: CC-12-23

1. Medium Density Residential – 5 acres of attached townhome product.

2. High Density Residential Area 1 – 4 acres in the northeast corner of the project area to include 1 and 2-bedroom apartments. Possible location for affordable senior housing product. City could partner with a developer to assist with providing

affordability through tax credits and HUD programs. Additionally, the project should include a like a senior community center or recreational room with activities geared toward seniors.

3. High Density Residential Area 2 – 7 acres in the center or the project area with 1, 2, and 3-bedroom apartments. Market rate rental with the possibility of adding a percentage of affordability. Work with a multi-family developer that can assist in providing a percentage of affordability in conjunction with density bonus law.

CC-12-23

The Paramount MSF would eliminate the City's ability to implement the aforementioned Specific Plan. Paramount cannot afford to lose any housing opportunities given its high Regional Housing Needs Assessment (RHNA) numbers and the City's limited amount of developable land.

Section 2.5.4 System Components; Pedestrian Facilities (Tunnels). Page 2-51

The Draft EIS/EIR states that a "pedestrian undercrossing will be constructed at Paramount High School to connect the existing athletic fields at Paramount Park to Paramount High School." No other information is provided regarding this pedestrian undercrossing facility. We are especially concerned about pedestrian safety and security. Any such undercrossing must be of substantial tunnel width with substantial lighting and all possible safety, security, and accessibility measures in place.

Section 2.5.4 System Components; Pedestrian Facilities (Bike Hubs). Page 2-51

The Draft EIS/EIR notes that bike hubs are proposed at station locations. Bike hubs should also include bicycle repair equipment.

CC-12-24

Section 2.5.4 System Components; Pedestrian Facilities (Metro Public Art). Page 2-51

The Draft EIS/EIR notes the integration of public art at stations and related transit facilities. The City of Paramount requests the inclusion of engagement with the local Paramount community and local arts nonprofits to truly integrate a community-based public art model into the project.

CC-12-25

Section 2.5.5 Rail Operating Characteristics. Page 2-52

The Draft EIS/EIR indicates the LRT trains will operate 22 hours a day during the weekday periods from 4:00 AM to 2:00 AM. Headways will range from one train every 2 ½ minutes during the busiest times to one train every 20 minutes during the late night and early morning periods. The City will discuss its concerns related to noise and other attendant impacts during the late evening and early morning hours later in this letter.

CC-12-26

Section 2.5.6 Construction Activities. Page 2-56

The Draft EIS/EIR indicates that simultaneous construction may be effective in reducing the overall construction duration. Working hours of construction would vary to meet the type of work being performed and to meet local ordinance restrictions. Nighttime and weekend construction may be required to mitigate potential impacts to the commute period and traffic congestion, and to accommodate construction scheduling for specific work activities. Such nighttime and weekend construction activities may include, but are not limited to, construction within freeway ROW, tunneling operations, trackwork construction, grade separation construction, catenary wire installation, and construction of other cut-and-cover sections. Construction activities are anticipated to occur over the course of approximately six years, commencing in 2022 and ending in 2028. We are requesting the EIS/EIR indicate the timing and during of construction for those project elements located in the City of Paramount. The EIS/EIR needs to indicate the mitigation measures that will be effective in ensuring that classes at nearby schools are not disrupted during construction. CC-12-27

Similarly, as stated in the Draft EIR/S, portions of Paramount include heavy industry. Manufacturing and distributing goods mean there is significant goods movement throughout the street system. The impacts to the movement of goods are not addressed. Changes to the streets, freeway access, and turns all affect the ability of trucks to move through the area and the time it takes for them to travel through the impacted area. There needs to be discussions with these businesses to ensure their needs are met through construction and after. Additionally in Appendix CC, 5-12 it states that one of the consequences of construction will be the relocation of businesses to other parts of Los Angeles County. Businesses thrive in areas where resources and labor are available. Just because there may be buildings that can house a business elsewhere does not mean that business can survive upon relocation. A specific business relocation plan needs to be developed. Loss of businesses means the loss of jobs. This is an especially difficult impact for this environmental justice (EJ) area. Part of the mitigation plan should include local worker hiring and training as well as a plan to utilize local minority business enterprises. CC-12-28 CC-12-29

Section 3.2.4.1 On and Off-Street Parking Analysis. Page 3-10

The Draft EIS/EIR outlines how the proposed project's impacts on off-street parking on private properties were assessed so as to determine whether the loss of these parking spaces would result in an adverse impact. If supply would fall below requirements, an adverse effect would occur. Metro would enter into an agreement with the applicable jurisdiction for the loss of off-street parking spaces associated with governmental institutions (e.g., city offices). In these instances, it is assumed that an agreement would be reached, and no adverse effects would occur. The off-street parking analysis also CC-12-30

considered whether excess parking demand at each station would result in increases in traffic circulation, traffic delay, and a corresponding increase in emissions as drivers seek to find available on-street parking. A detailed parking and traffic analysis for the Paramount/Rosecrans station is required. CC-12-30

Section 3.2.4.2 Spillover Parking Analysis. Page 3-10

The Draft EIS/EIR indicated that for those stations without dedicated transit parking, the travel demand model did not include any parking supply and therefore, parking demand was not projected. For these stations, it is assumed that no transit parking would materialize during operation of the project as there would not be a dedicated parking supply. However, an analysis of available on-street parking was conducted around these stations to determine if some parking demand could be accommodated if passengers do attempt to drive to these stations. While this does not apply to the two stations located in Paramount, there was an assumption that on-street parking would be available to make up for any shortfall. The City of Paramount is very concerned about the potential for spillover parking around the two stations within its planning area. Furthermore, we did not find any detailed parking analysis that was referred to in the Draft EIS/EIR. CC-12-31

Section 3.2.4.2 Spillover Parking Analysis. Page 3-10

Table 3.4 identified Rosecrans Avenue as the only major arterial considered in the Draft EIR's traffic analysis. We would also request that Paramount Boulevard be added to this list. This street is important given that the proposed Paramount Station is located nearby, and the alignment crosses this street near Paramount High School. CC-12-32

Section 3. Transportation. Page 3-41

As indicated in Table 3-12, under the future year (2042) no build alternative, the Paramount Boulevard/Bianchi Way intersection would operate at a LOS A and LOS C during the AM and PM peak hour respectively and the Paramount/Rosecrans intersection would operate a LOS E and LOS C during the AM and PM peak hour respectively. According to Table 3-14, under Alternative 2 operational alternative, the Paramount Boulevard/Bianchi Way intersection would operate at a LOS A and LOS A during the AM and PM peak hour respectively and the Paramount/Rosecrans intersection would operate a LOS E and LOS C during the AM and PM peak hour respectively. Clearly, the project would impact this intersection especially with the Paramount MSF option. It appears that no mitigation is being recommended at the Paramount/Rosecrans intersection even though some mitigation may be warranted given the level of service impact. CC-12-33

Section 3.4 Transportation MSF Site Option. Page 3-54

The Draft EIS/EIR indicated, as a means to assess potential impacts, traffic volumes from the Paramount MSF site option, a peak hour trip generation rate was first determined from driveway traffic counts at the Metro Division 22 LRT maintenance facility serving the Metro C (Green) Line (at 14724 Aviation Boulevard in Lawndale). The projected traffic to and from the Paramount MSF is 23 vehicle trips in the AM peak hour and 26 vehicle trips in the PM hour. The Draft EIS/EIR stated that, "these values are below LADOT's 2016 Transportation Impact Study Guidelines threshold for new developments (43 vehicle trips during the AM/PM peak hours). Therefore, the effect on traffic would not be adverse. Trains entering and exiting the MSF would have to use the existing at-grade rail crossing on Rosecrans Avenue (between the signalized intersection at Garfield Avenue and Bianchi Way)." According to the Draft EIS/EIR, "the timing and frequency of these crossing events are anticipated to occur during off-peak traffic hours when traffic volumes would be lower. Therefore, these impacts would be substantial." Did the traffic analysis take into account the impacts of the LRTs crossing of Rosecrans Avenue and the attendant blocking of vehicular traffic even during off-peak periods? As stated previously, the Draft EIS/EIR did not include a traffic analysis. CC-12-34

Section 3. Paramount Bike Trail Impact. Page 3-70

The Paramount Bike Trail segment between Somerset Boulevard and Lakewood Boulevard is located within the PE ROW. Segments of the PE ROW extending south from the intersection of Rosecrans Avenue and Paramount Boulevard to Lakewood Boulevard may not have sufficient room to accommodate the alignment of Alternative 1, which may require a realignment of the Paramount Bike Trail. Specifically, under Alternative 1, tracks would be installed along the southwest side of the PE ROW along this segment. To accommodate the track alignment, Alternative 1 would require the removal of an approximately 930-foot-long segment of the existing Paramount Bike Trail between Somerset Boulevard and Lakewood Boulevard. As part of Mitigation Measure LU-1 (Consistency with Bike Plans), as described in Section 4.1.4 of the Land Use Section, this segment of the existing bike trail would be realigned to the north side but within the PE ROW in this area. The relocation of this segment of the Paramount Bike Trail would require users of the bike trail to cross the railroad tracks at Lakewood Boulevard to access the bike trail across the street. Supposedly, segments of the Paramount Bike Trail would be realigned, the bike trail would remain operational and the existing segment east of Lakewood Boulevard would remain. The City is very concerned about the safety of bicyclists and pedestrians, especially during the LRT's busiest periods when headways will be around 2 ½ minutes. CC-12-35

Section 3. Station Parking Demand. Page 3-81

According to the Draft EIR/EIR, the implementation of both Alternative 1 and 2 would have the same effect on on-street parking. The parking supply for the I-105C station will be 326 spaces while the parking supply for the Paramount/Rosecrans station will be 490 parking spaces. The parking demand for the I-105C station will be 450 spaces while the parking demand for the Paramount/Rosecrans station will be 530 parking spaces. The Draft EIS/EIR indicated that the excess parking demand (it should have indicated this as a *deficiency*) was 124 spaces for the 1-105 station and 40 spaces for the Paramount/Rosecrans station. Station parking would meet the anticipated demand for Alternatives 3 and 4. The City remains very concerned regarding the potential for the spillover parking impacts

CC-12-36

Section 3.4.2.6. Design Options (Station Boardings). Page 3-86

The Draft EIS/EIR indicates the anticipated daily boardings for the stations. Under Alternative 1, the I-105C station is projected to have 5,891 daily boardings while the Paramount/Rosecrans station is projected to have 2,320 daily boardings. Under Alternative 2, the I-105C station is projected to have 6,414 daily boardings while the Paramount/Rosecrans station is projected to have 2,400 daily boardings. Given the relatively high number of boardings at these two stations, how can the City be assured that the parking supply will be adequate to meet demand? Therefore, the City reiterates our request to Metro that the I-105-C station be made into a "transfer station" only.

CC-12-37

Section 3.5 Mitigation Measures. Page 3-86

We are concerned than no mitigation measures or design measures were recommended for Rosecrans Avenue in the vicinity of the new station. The new station and the new LRT tracks and signals will impact traffic on both Rosecrans Boulevard and Paramount Boulevard. The City was surprised that no mitigation was included in the Draft EIS/EIR.

CC-12-38

Section 4. Affected Environment and Environmental Consequences. Mitigation for Land Use Consistency. Page 4-22

The Draft EIS/EIR indicates that Mitigation Measure LU-1 would ensure that the Lead Agency "would continue to coordinate with jurisdictions and local agencies to minimize the preemption of future development, goals, and plans within each jurisdiction. As part of this effort, Metro, as appropriate, would support [the] preparation of amended language for each affected bicycle plan demonstrating that planned bicycle facilities could still achieve an individual city's mobility and connectivity goals. However, because the process to amend bike plans is a local process, including public participation, the ultimate outcome and resolution of plan elements cannot be predicted. Therefore, after mitigation,

CC-12-39

adverse effects would remain for Alternative 1 related to consistency with local land use plans." This statement is very confusing and seems to imply that the mitigation would be ineffective. Furthermore, it clearly is deferring mitigation. If the project is impacting the bike trail, this impact must be clearly addressed. CC-12-39

Section 4. Affected Environment and Environmental Consequences. Land Use Consistency. Page 4-28

We do not agree with the Draft EIS/EIR's statement "that the Paramount MSF option would not result in adverse effects related to consistency with local land use plans, policies, and regulations." This area that has been identified for the proposed MSF facility is the only drive-in theater and movie theater complex in the area and the entire area is designated for commercial and industrial uses. This is one more reason the City of Paramount cannot support the Paramount MSF option. CC-12-40

Section 4. Affected Environment and Environmental Consequences. Land Use Consistency. Page 4-40

The Draft EIS/EIR indicates the proposed parking facility at the I-105/C Line Station in South Gate "would further improve access to the regional transportation system as residents in the surrounding area would have access to both the proposed transit line and the Metro C (Green) Line. At this station, the Project would construct a new Metro C (Green) Line Station platform within the median of the I-105 freeway. While some of the proposed parking facilities are located adjacent to residential neighborhoods, none of the proposed facilities would impede access and mobility of motorists, pedestrians, and bicyclists to residential neighborhoods and community assets. Rather, regional and local access to and from these communities would increase." The Draft EIS/EIR lacks sufficient detail regarding potential displacement impacts to private property at either station to accommodate the proposed parking areas. The traffic impacts associated with this station's operation would significantly impact this neighborhood. Therefore, the City reiterates our request to Metro that the I-105-C station be made into a "transfer station" only. CC-12-41

Section 4. Affected Environment and Environmental Consequences. Land Use Displacement. Page 4-49, Table 4.2.4

Table 4.2.4 in the Draft EIS/EIR indicates there would be a "partial" dislocation of 4 multiple-family units related to the various factors related to the realignment. The nature of this dislocation is only summarized in a small box in the above referenced table. The City requests that an exhibit be provided in the Draft EIS/EIS (not an Appendix) that clearly indicates the location and extent of the potential property dislocation, including the commercial property. CC-12-42

Housing is a critical issue for the City of Paramount, and the City cannot afford to lose a single residence. Where it is necessary to acquire residential property to construct this transit line, it is also critical to recognize these lost housing units cannot just be lost. One cannot agree with the statement on 4-35 that there is "there is sufficient replacement housing" in the county. Additionally, Section 4.3 also states the number of occupants incorrectly. The density of individual's living in this area is the highest in the county. Due to the cost of housing, there often is more than one family living in a single-family residence. The housing lost should be replaced by comparable affordable housing. Housing that loses its backyards may be able to exist, pending on the amount of space lost, but that is also open space. These communities are park poor. Removing the backyards further impacts the requirement for open space. Similarly, removing trees that help create neighborhoods changes its character. Several of the cities have been working hard to plant trees to improve their communities and improve air quality. It is recommended that each tree removed be replaced with two mature trees. These replacement trees must be tree types demonstrated to absorb air particulates. It is important for the communities and will help mitigate the corridor's impact on the environment.

CC-12-43

CC-12-44

CC-12-45

Section 4.2.3.7. Maintenance and Storage facility Site Options. Page 4-59.

The Draft EIS/EIR correctly points out that Our Lady of the Rosary Church and School adjoins the proposed Paramount MSF site to the east, with Paramount Park, Paramount Park Middle School, and Paramount High School located farther east along Paramount Boulevard. Security barriers would be installed along the perimeter of the site, which would not create a physical barrier to an established community because the barrier would be around the perimeter of the site only and would not obstruct or close public street rights-of-way. These barriers are designed to obstruct vehicular traffic and would do nothing to protect these sensitive receptors from toxic airborne emissions and noise impacts associated with the railyard activities.

CC-12-46

Section 4.2.3.7. Maintenance and Storage facility Site Options. Page 4-59.

The City of Paramount is in strong disagreement with the statement that "the Paramount MSF site option would not adversely affect the visual character of the surrounding area and would not result in adverse noise effects at the surrounding uses. The Paramount MSF site option would be consistent with the industrial and commercial uses on the site and in the surrounding area." This is a conclusionary statement that is not based on fact. The City has objected to the Paramount MSF option from the very beginning.

CC-12-47

Section 4.3.3. Environmental Consequences/Environmental Impacts. Table 4.3.1 Page 4-66.

Table 4.3.1 included in the Draft EIS/EIR compares the land area that would be included in the Paramount MSF with that included in the Bellflower MSF. The Paramount MSF will require the acquisition of 1,052,800 square feet of land area compared to 934,500 square feet for the Bellflower MSF option. It is important to note that the Paramount MSF site is centrally located in the City near a large number of sensitive receptors. CC-12-48

Section 4.3.3. Environmental Consequences/Environmental Impacts. Table 4.3.2 Page 4-66.

Table 4.3.2 included in the Draft EIS/EIR indicates that an additional 283,800 square feet of land area would need to be acquired to accommodate the proposed project. Does this figure include all of the properties shown in Figure 4.3-13 as "potential displacement"? If not, this earlier estimate is likely to be inaccurate and does not reflect a worst case. CC-12-49

Section 4.3. Acquisition and Displacement. Page 4-66.

The Draft EIS/EIR correctly states that "the proposed site for the Paramount MSF site option does not contain residential units. However, lead tracks to the Paramount MSF site option would affect residential properties: 1 full acquisition and 6 partial acquisitions for a total of 7 affected residential properties. A total of approximately 28 residential occupants would be displaced." The Draft EIS/EIR goes on to state that "replacement sites would be available in the future for the industrial businesses affected by the Paramount MSF site option. However, comparable replacement sites may not be available for the drive-in theater and swap meet and these businesses "may not be able to relocate within the city or within 6 miles of the affected businesses." The Draft EIS/EIR acknowledges that there are no sites available that could accommodate these businesses that could be displaced by the proposed Paramount MSF. How can this impact be mitigated? CC-12-50

Section 4.3. Acquisition and Displacement. Page 4-66.

The Draft EIS/EIR makes a general statement for the various design alternatives that there is "sufficient residential replacement sites for sale and rent [that] are currently available in cities that would have residential displacements: cities of Los Angeles, Huntington Park, Bellflower, Paramount, and Artesia, as well as in surrounding cities (i.e., Vernon, Downey, Cerritos, Lakewood, and North Long Beach) (Table 4.3.8). Unless there is a significant change in vacancy rates at the time of acquisition, there would likely be sufficient replacement sites to relocate individuals displaced and owners of [the] properties affected." Paramount is not sure that this statement can be supported by the evidence based on recent housing trends. Because there is a lack of replacement housing and there are no replacement properties available for the swap meet and theater, we request the Paramount MSF option be eliminated from further consideration. CC-12-51

Section 4.4. Aesthetics. Table 4-4-8. Page 4-169.

The potential visual impacts of the Rosecrans/Paramount station are summarized in Table 4-4-8. The City would request that a drawing or a visual simulation of this station of Paramount be included in the EIS/EIR to better illustrate the appearance of the proposed new station and its ancillary facilities. We question the conclusions outlined in the Table in the absence of any visual characterization for the proposed station. The City also wants to enter into a maintenance agreement with Metro to ensure that the LRT facilities and the stations are maintained and kept graffiti-free and vandalism-free.

CC-12-52

CC-12-53

Section 4.4.4.2 Mitigation Measures. VA-1. Page 4-190.

Mitigation Measure VA-1 notes "The existing World Energy landscaping and decorative wall north of Somerset Boulevard and east of the proposed light rail transit tracks would remain in place. If the existing decorative screening wall and/or landscaping directly south of the World Energy storage tracks and east of the proposed light rail transit tracks are removed, these screening elements would be replaced with a new screening wall and/or landscaping. A decorative screening wall and/or landscaping would be placed within the PEROW between the proposed light rail transit tracks and storage tracks at a length and height capable of screening the refinery storage track from views on Somerset Boulevard." The City of Paramount emphasizes that this decorative screening wall was installed at the result of substantial negotiations and eventual conditions of approval of conditional use permits for refinery operations. If the decorative screening wall and/or landscaping is removed for the project, any replacement screening wall and/or landscaping must be at least as decorative in terms of design, materials, and screening height as the material to be replaced.

CC-12-54

Section 4.5. Air Quality. Table 4-5-9. Page 4-209.

Table 4-5-9 indicates there would be a significant decrease in air emissions between 2017 and 2041. The decline in emissions would occur even with an increase from approximately 463.25 million vehicle miles travelled (VMT, 2018) to approximately 606.33 million VMT in 2042. According to the Draft EIS/EIR, these emission reductions between 2017 and the year 2042 can be attributed to alternative-fueled passenger vehicles (i.e., electric and natural gas) added to the vehicle fleet and continued improvements in fuel efficiency. The Draft EIR/EIR states that, "the incremental increases in particulate matter emissions relative to Existing Conditions are solely attributed to ambient regional population growth spurring additional regional VMT and associated road dust and break and tire wear. As regional air quality continues to improve in the future, the deposition of dust on roads will be reduced." First, we are confused as to both the accuracy and the relevance of the last statement. Secondly, did the year 2042 estimates also consider the off-site emission generated as part of the energy production required for the alternative powered vehicles?

CC-12-55

Section 4.5. Air Quality. Analysis of Alternative Table 4-5-10 and 11. Pages 4-211 and 12.

The analysis of air quality impacts for the operational objective appeared to focus only on the VMT reductions. Did the emissions calculations consider the offsite emissions related to the generation of electrical power for the trains themselves and the other project elements (lighting, signals, station equipment, etc.)? CC-12-56

Section 4.5.3.7. Air Quality. Analysis of Paramount MSF. Pages 4-216.

The Draft EIS/EIR did not include an analysis of localized air quality impacts associated with the operation off the Paramount MSF option. This is unfortunate given the large number of sensitive receptors in the immediate vicinity of the potential MSF site. The Draft EIS/EIR states, "the MSF will be a requisite component of the Project and would not operate independently. The analysis of operational emissions generated by the MSF is therefore incorporated with the Build Alternatives analysis." The build options rely on VMT calculations to estimate emissions. The MSF facilities will involve maintenance and repair activities that will be using equipment and involve activities that will be generating potential airborne emissions that will be very different from other types of land uses. The EIS/EIR must describe the MSF activities and the attendant emissions, including the toxic emissions that could affect the nearby schools and other sensitive receptors. CC-12-57

Section 4.5.3.7. Air Quality. Analysis of Paramount MSF. Pages 4-221.

The Draft EIS/EIR, in Table 4.5.15 included a summary of a CalEEMod analysis of a typical Maintenance Storage Facility. Again, the independent variables used in the modeling were vehicle trips, trip length, floor area, and the other variables required to operate the model. Once again, the City is concerned with the other toxic airborne emissions associated with the operation of this MSF option that could affect the nearby private school, church, middle school, high school, and park. This is an important reason that the Paramount MSF option should be removed from consideration. CC-12-58

Section 4.6. Greenhouse Gas. Pages 4-228

The analysis of the proposed project's greenhouse gas (GHG) impacts relies on VMT reductions to demonstrate that there would be a GHG benefit. While we do not argue that reducing freeway congestion would be beneficial in reducing GHG, it appears that Table 4.6.2 makes an effort in establishing a connection between the operation of the LRT and the consumption of electricity and the attendant off-site GHG emissions. The analysis relies on light rail vehicle revenue per mile. We don't understand why the Draft EIR/EIR didn't just provide an estimate of electrical consumption with the resulting GHG emissions associated with the consumption. CC-12-59

Section 4.6. Greenhouse Gas. Table 4.6.5 Pages 4-233

The second row of Table 4.6.5 is labeled "LRT Propulsion." Does this refer to offsite electrical power generation? Analysis of the proposed project's greenhouse gas (GHG) impacts relies on VMT reductions to demonstrate that there would be a GHG benefit. While we do not argue that reducing freeway congestion would be beneficial in reducing GHG. It appears that Table 4.6.2 tries to make a connection between the operation of the LRT and the consumption of electricity and the attendant off-site GHG emissions. The analysis relies on light rail vehicle revenue per mile. We don't understand why the Draft EIR/EIR didn't just provide an estimate of electrical consumption with the resulting GHG emissions.

CC-12-60

Section 4.7. Noise. Pages 4-257

According to the Draft EIS/EIR, the potential noise impacts would largely be the same for all of the project alternatives for both the at-grade or aerial segments. The noise analysis included in the Draft EIS/EIR is very confusing in its reference to "clusters." For example, the Draft EIS/EIR states, "Alternative 3 would affect clusters 33 through 347 and would result in moderate impacts at 59 of 289 Category 2 clusters and severe impacts at 153 Category 2 clusters. Impacts at Category 3 clusters would remain the same as Alternatives 1 and 2." The use of graphics would assist the reader in identifying the location and extent of the affected properties. This narrative is not meaningful without any exhibits or reference maps.

CC-12-61

Section 4.7. Noise at Paramount MSF. Pages 4-259

The Draft EIS/EIR indicates that "MSF noise sources include train movements within the MSF and on lead tracks, wheels striking, special trackwork, wheel squeal on curves, maintenance shops, the car wash, and associated vehicular traffic from employee trips. Noise levels related to these sources were modeled at the 18 sensitive use clusters near the Paramount MSF site option, and noise levels would not exceed the FTA impact criteria at nearby sensitive uses." The Draft EIS/EIR goes on to say that "Vibration impacts may occur related to the light rail vehicles moving around the MSF, at lead tracks, and near special trackwork." While the Draft EIS/EIR indicates the Paramount MSF site option is more than 200 feet from any residential land uses, other sensitive land uses are located in the immediate area which are not mentioned.

CC-12-62

Section 4.7.4.2. Noise Mitigation. Table NOI-1 Pages 4-260

Mitigation Measure NOI-1 indicates that sound walls would be placed at the edge of the right-of-way or at the edge of aerial structures to reduce noise related to light rail transit vehicles at the identified sensitive receiver locations shown in NOI-1 where moderate and severe impacts have been identified based on design completed to date. Height and length will be verified during final design to meet Federal Transit Administration

CC-12-63

requirements. Several of these sound wall locations are in or near the City of Paramount (for example, near Paramount High School). An exhibit clearly indicating the location and extent of these sound walls in the EIS/EIR is requested. (The sound wall notations in Exhibit 4.7-9 are very difficult to read.) In addition, an exhibit included in the Aesthetics analysis would also be very helpful. We would also request the analysis be expanded to include a description of the proposed sound wall (including the height) along Façade Avenue and Arthur Avenue. The City would like the wall to be the same height of freight train. Since the WSAB project requires the existing freight train tracks to relocate only 10 feet from the property lines of residents living on Façade Avenue. What other mitigation measures are planned? Vegetation? Finally, there must not be any breaks in the sound wall.

CC-12-63

CC-12-64

Section 4.7.4.2. Noise Mitigation. Table NOI-4 Pages 4-264

The Draft EIS/EIR indicates that crossing signal bells at the locations identified in Table NOI-4 would be equipped with shrouds to direct bell noise away from sensitive receivers. With these shrouds, the crossing signal bell noise would not exceed 104 dBA SEL at 50 feet. We understand the need for these crossing signals for both pedestrian and vehicular safety. However, we question whether these shrouds will be sufficient mitigation given the potential headways during the late night and early morning periods, particularly in heavy residential areas along Façade Avenue and Arthur Avenue.

CC-12-65

Section 4.7.4.2. Noise Impacts. Exhibit 4.7-9 Pages 4-289

Exhibit 4.7-9 underscores the potential noise impacts associated with the proposed Paramount MSF option. The Exhibit does not identify the impacts or the mitigation for those areas near the proposed Paramount MSF Option.

CC-12-66

Section 4.7.4.2 Noise Impacts and Mitigation General Concern

The City is very concerned about the noise impacts on the residential neighborhoods on either side of the LRT ROW between the I-105 Freeway (on the north) and continuing southerly to the Paramount/Rosecrans station. The installation of the new LRT tracks will require the relocation of the existing heavy rail tracks even closer to the existing homes on Arthur Avenue. Because of privacy issues and potential noise impacts, a decorative block wall along the LRT side will need to be tall enough (with sufficient depth/thickness) to attenuate the noise and to ensure privacy of the rear yards of the homes located along the alignment. For those homes located next to the relocated freight tracks, a new decorative wall must be high enough to shield the residences from the view of the top of the freight train engines and cars. The Metro shall also employ the best available control measures to reduce the rail and track noises from the LRT equipment and infrastructure.

CC-12-67

Section 4.9 Geotechnical, Subsurface, and Seismic Pages 4-336

The Draft EIS/EIR provides a general overview of the soil characteristics of Paramount and the project area. The soils are alluvial and very sandy and many of the larger construction projects have had to use jackhammers during the construction phases. The Draft EIS/EIR did not indicate any special construction measures that would be needed during the construction of the aerial guideways or other project elements that might be required given the area's unique soil characteristics. CC-12-68

Section 4.10 Hazardous Materials. Pages 4-405

The California PRC§ 21151.4 requires projects that are located within 0.25 mile of a school to "discuss potential effects with the appropriate school district if a project could reasonably be anticipated to emit hazardous air emissions or handle an extremely hazardous substance or a mixture containing extremely hazardous substances in a quantity equal to or greater than the state threshold quantity specified pursuant to subdivision (j) of Section 25532 of the Health and Safety Code." As indicated previously, the City is concerned about the hazardous materials that will be stored or handled at the proposed Paramount MSF. The Draft EIS/EIR states that the "operation of the maintenance facilities would not emit hazardous air emissions. Mixtures containing extremely hazardous substances would not be used in quantities equal to or greater than the state threshold quantity specified pursuant to subdivision (j) of Section 25532 of the Health and Safety Code." Is this an accurate statement? CC-12-69

The Draft EIS/EIR goes on to state that, "Project Measure HAZ PM-1 (Handling, Storage, and Transport of Hazardous Materials or Wastes [Operation]) would be implemented to manage hazardous materials appropriately during operation and with [the] implementation of this measure, operation of the Paramount MSF site option would result in no adverse effects related to educational facilities." The mitigation is so general and vague it provides no assurance that the nearby sensitive receptors will be protected in the event of a hazardous release. In addition, the City has no idea as to the nature of the hazardous materials and toxic substances that will be stored and handled at the Paramount MSF option. This information must be disclosed, and effective and enforceable mitigation must be identified. CC-12-70

Section 4.12 Energy. Table 4.12.4 Page 4-456

The Table included in the Draft EIS/EIR compares the direct and indirect consumption of energy for the various LRT alternatives with the "No Build" alternative. As shown in Table 4.12.4, Alternatives 1 and 2 would reduce regional energy consumption from the No Build Alternative by 515,569 MMBTU (0.06 percent net reduction). The reduction in regional energy consumption represents a conservation potential of 515,569 MMBTU annually relative to the No Build Alternative, and the reduction is consistent with objectives of regional planning strategies to reduce reliance on fossil fuels and nonrenewable CC-12-71

resources. Given the expenditure for the entire project, the resulting energy savings does not appear to be significant. Can the figures outlined in the aforementioned Table be correct? Do these figures take into account the State's goal for eliminating the sale of fossil fueled vehicles by 2035? CC-12-71

Section 4.13 Electromagnetic Fields. Page 4-465

The Draft EIS/EIR, in its analysis of the proposed project's electromagnetic impacts, indicated that "no highly sensitive equipment was identified in the vicinity of the maintenance and storage facility site options; therefore, the maintenance and storage facility would not affect EMF-sensitive equipment operation." This statement is conclusionary without any supporting evidence. CC-12-72

Section 4.14 Historic Resources. Page 4-479

Exhibit 4.14-1 is misleading in that it appears that there are no historic resources in Paramount located near the LRT alignment. However, the Paramount MSF site option is located adjacent to the existing Our Lady of the Rosary Church/MRN 24-001). This MSF option would introduce new visual elements to the vicinity of the historic property. The City does not concur with the general unsupported statement included in the Draft EIS/EIR that states [that these] "new elements would not significantly alter the visual character and quality of the area or reduce the property's integrity." CC-12-73

Section 4.14 Historic Impacts. Page 4-509

The Draft EIS/EIR indicates later in the document that the proposed Paramount MSF is "located directly to the west (rear) of one historical resource (Our Lady of the Rosary Church/MRN 24-001). The resource's eligibility [of this church] is related to its architecture, which would not be altered by operation of the Paramount MSF site option. While it would introduce new visual elements to the vicinity of this historic property, new elements would not significantly alter the visual character and quality of the area, which may be characterized as urban, or reduce the property's integrity. Operation of the Paramount MSF would result in a less than significant impact to historical resources, and mitigation would not be required." The City of Paramount does not agree with this finding; the existing swap meet and drive-in represents a very different use than that a light rail maintenance facility. CC-12-74

Section 4.16 Recreation Impacts. Page 4-538

Alternatives 1, 2, and 3 would require a partial property acquisition of the LADWP utility right-of-way to accommodate the track alignment, Paramount Bike Trail, and a permanent aerial easement on public ROW at the corner of Paramount Boulevard and Rosecrans Avenue, and along the northern boundary of Paramount Park. The primary use of the LADWP utility right-of-way is not for recreational uses and would not directly affect the CC-12-75

function of Paramount Park or the Paramount Bike Trail. Alternative 1 would require termination of the lease agreement between Metro and the City of Paramount for the 40-foot-wide section of the Metro-owned ROW currently used for parking and landscaping by Paramount Park. Because Alternative 4 would have a shorter alignment length, this alternative would not impact Paramount Park. If the other Alternatives were selected, the Draft EIS/EIR does not indicate how the loss of parking at Paramount Park might be mitigated. CC-12-75

Section 4.18 Safety and Security. Page 4-578

The Draft EIS/EIR indicates that pedestrian and bicycle safety during operation "would consider safety along the alignment, at station locations, at designated crossings, and at proposed parking facilities. Pedestrian safety issues would mostly apply to proposed at-grade stations and less to the proposed underground and aerial LRT facilities, as underground and aerial stations can be designed to avoid these concerns. Additionally, the underground and aerial stations would avoid potential conflicts between pedestrians/bicyclists and motor vehicles that would occur with the at-grade stations." These statements are good though what evidence is there that these goals can be implemented. In addition, will the additional security required for the Paramount/Rosecrans station and other facilities in Paramount affect the City's contract with the Los Angeles Sheriff's Department (LASD). CC-12-76

Section 4.17. Economic Impacts. Page 4-569

We do not agree with the Draft EIR/EIR that the dislocation of the businesses and employees required to accommodate the Paramount MSF option would not be significant. As indicated previously, the Draft EIS/EIR indicated that the swap meet and theater would not likely be able to relocate in the City. The analysis must indicate loss of revenue to the City and how the property owners and employees will be compensated. For example, the Paramount Swap Meet that will be displaced by the proposed Paramount MSF option currently houses more than 700 venders. These small businesses provided both jobs and sales tax. CC-12-77

Section 4.18.4 Safety and Security, Mitigation. Page 4-596

Mitigation Measure "SSAF PM-4, Pedestrian Bridges" indicates that "Pedestrian bridges would be provided to avoid potential interactions between pedestrians and vehicle traffic at the following locations: Paramount High School. Pedestrian tunnel connecting athletic fields to school (Alternatives 1, 2, 3, and 4) [would also be required.] The City requests that drawings of this tunnel mitigation be provided for review. We are very concerned about pedestrian safety and security within the proposed tunnel. Any such undercrossing must be of substantial tunnel width with substantial lighting and all possible safety and security measures in place. CC-12-78

Section 4.19.3 Historic, Archaeological, and Paleontological Resources Page 4-767

The historic analysis should recognize the historic significance of the properties at 14147-14151 Paramount Boulevard (at the northeast corner of Paramount Boulevard and Rosecrans Avenue). The building on this property was constructed in 1926 and contained businesses such as Wilkey's Drugs that served riders of the adjacent Pacific Electric Railway. Although Paramount does not have a local preservation ordinance formally protecting the building, we ask that Metro take all available and feasible measures to protect the building during construction and operation and/or recognize the contributions of this building, owners, and customers to the history of Paramount. CC-12-79

Appendix AA – Parklands and Communities Impact Report

Section 3.4.8 Bellflower-Paramount Bike Active Transportation Plan. Page 3-15

The appendix states that the Bellflower-Paramount Active Transportation Plan superseded the Bellflower-Paramount Bike and Trail Master Plan. This is not the case. The two plans complement each other. CC-12-80

Appendix D – Transportation Impact Analysis Report prepared by WSP and Jacobs

The following are comments on Appendix D of the Draft EIS/EIR document. These comments are primarily focused on Alternative 3 "Staff Preferred Alternative" (from Executive Summary page S-3). CC-12-81

General Comments

1. Section 9, References. Several items directly related to the West Santa Ana Branch analysis by Los Angeles County Metropolitan Transportation Authority (Metro) do not provide hyperlinks to easily cross reference. For example, first reference on page 9-3, Corridors Base Model 2018 Calibration and Validation Report, does not provide a hyperlink to the document.

2. There are no analysis sheets provided that detail the HCM/Synchro model analysis of the study intersections. Specifically for the City of Paramount, we cannot determine if mitigation measures previously proposed from other analyses has been considered. These previous studies include the Metro Truck Impacted Intersection Study and the original I-710 Freeway EIR. These studies indicated the need for dual left turn lanes in all directions of the intersection. Was this included as part of the analysis? Please provide all Synchro analysis sheets, including the Synchro input files, for the City's review. CC-12-82

3. There is a renewable fuels project (Paramount Petroleum AltAir Renewable Fuels Project Traffic Impact Analysis, August 20, 2021, iteris) proposed at the northwest corner of Lakewood Boulevard and Somerset Boulevard. The project site extends along the CC-12-83

northside of the WASB corridor from Somerset Boulevard to Downey Avenue. Initial analysis of the renewable fuels project indicates an estimated an additional 100 PCE trips in the AM and PM peak hour will be added to Lakewood Boulevard and Somerset Boulevard. The total daily PCE trips for the renewable fuels project are estimated at 2,400 trips. Based on the additional trips of the renewable fuels project and queue analysis of Lakewood Boulevard/Somerset Boulevard, the City strongly believes this section of the WSAB project should be above grade (aerial) or underground. The aerial/underground placement of the rail will eliminate the negative impacts of the WSAB project. The WSAB Corridor should include this project in the EIS/EIR and transportation impact analyses as it has direct impact to the WASB project including rail and vehicular impacts. CC-12-83

4. There are pages that appear to be left blank intentionally. Please identify these pages appropriately (see Page A6-2 for example). CC-12-84

5. Tables showing Headways do not clarify that headways are in minutes. Sample see Table 5.17. CC-12-85

Transportation Impact Analysis Report

1. Page 1-6, last paragraph – The paragraph begins with "Figure 1-2". This is the wrong reference. Should this be Figure 1-1? CC-12-86

2. Section 1.5.1, Analysis Approach: Traffic Operations (Page 1-7) – What are the default value inputs used for coding the HCM/Synchro model analysis? Program default values may not represent study locations and should be adjusted to simulate actual field conditions. Section 9 References do not appear to include any analysis detail reports/studies. CC-12-87

3. Section 1.5.10, Applying LOS for Impact Assessment (Page 1-14) – How did the HCM/Synchro software simulate a rail crossing operation? It is our understanding that Synchro has limited ability to properly simulate a train crossing event. The main concern in using the Synchro software is that the schedule of events (an event is a train crossing and activating the gate) cannot be set and controlled in the model. As such, even though headways of the trains are known, that information cannot be inputted into the model. The model generates vehicles randomly and as a result, a fixed set of assumptions and known conditions could generate different output results in separate runs. How many Synchro analysis runs were conducted to determine the delay and 95% vehicular queue for the study intersections? CC-12-88 CC-12-89

4. Figure 2-2. Project Alignment by Alignment Type (Page 2-4) – The line definitions/legends for the "At-Grade, Aerial, and Underground" call outs are difficult to determine because of the scale of the map. Unless the reader translates line-by-line the details found on pages 2-12 to 2-14, the different line types are not distinguishable. How can this Figure be improved to clearly identify the proposed track position? CC-12-90

5. Table 4.46. On-Street Parking Conditions: Proposed Locations (Page 4-50) – Parking demand observations were made in 2017. Based on these observations near the Gardendale, I-105/C Line, and Paramount/Rosecrans stations, the parking demand was 40%, 40%, and 70%, respectively. Additional details can be found in Tables 4.66, 4.68, and 4.70. However, parking demand within the adjacent residential neighborhoods are at much higher percentages and should be considered. CC-12-91

6. Table 5.4. 2042 Build Alternative 2 Operations (Page 5-9) – This table identifies the delay (seconds) and Level of Service (LOS) for Alternative 2. The traffic impacts of Alternative 3 (Staff Preferred Alternative) "would be equal to or less than those at the same facilities for Alternative 2" (page 5-16, Section 5.1.4, Alternative 3: Slauson/A (Blue) Line to Pioneer Station). The impacts for the City of Paramount (page 5-12) are shown. As previously stated, there are no analysis sheets provided that detail the HCM/Synchro model analysis of the study intersections. We are unable to determine if the analysis methodology and inputs are appropriate. Provide all Synchro analysis sheets, including the Synchro input files, for the City's review. CC-12-92

7. Table 5.5. 2042 Build Alternative 2, 95th Percentile Queues from Upstream Crossing to Intersection (Page 5-14) – This table indicates queue lengths can be accommodated at locations within the City except for Lakewood Boulevard at Somerset Boulevard. There are no specific mitigation measures proposed for the Lakewood Boulevard/Somerset Boulevard queuing impact. Based on the additional trips of the renewable fuels project and queue analysis of Lakewood Boulevard/Somerset Boulevard, the City strongly believes this section of the WSAB project should be above grade (aerial). The aerial placement of the rail will eliminate the negative impacts of the WSAB project. The WASB Corridor should include this project in the EIS/EIR analyses as it has direct impact to the WASB project including rail and vehicular impacts. CC-12-93

8. Section 5.1.7.1 Paramount MSF Site Option (Page 5-23) – The City of Paramount is strongly opposed to the construction and operation of the Paramount MSF option. This alternative would have displacement impacts on a key commercial area of the City. A number of homes would also be displaced. In addition, the MSF's operation would lead to traffic and noise impacts on Rosecrans Boulevard. The projected traffic to and from the Paramount MSF is 23 vehicle trips in the AM peak hour and 26 vehicle trips in the PM hour. Based on the threshold of 43 vehicle trips during the AM/PM peak hours from the LADOT's 2016 Transportation Impact Study Guidelines, the report states, "vehicular trips generated by the proposed MSF are substantially lower than LADOT's thresholds, the effect on traffic would not be adverse". The City does not agree with this conclusion. How will these trips access the MSF site? It is unclear if rail access to the Paramount MSF site will cross Rosecrans Boulevard at-grade or as an aerial rail. This should be clarified in the report. If the crossing is at-grade, what are the delay impacts of the LRTs crossing Rosecrans Boulevard and the blocking of vehicular traffic even during off-peak periods? What is the queue analysis of this at-grade crossing? CC-12-94 CC-12-95

9. Section 5.3.2 Alternative 1: Los Angeles Union Station to Pioneer Station (Page 5-58) – The Paramount Bike Trail segment between Somerset Boulevard and Lakewood Boulevard is located within the PE ROW. Segments of the PE ROW extending south from the intersection of Rosecrans Avenue and Paramount Boulevard to Lakewood Boulevard may not have sufficient room to accommodate the alignment of Alternative 1, which may require a realignment of the Paramount Bike Trail. Specifically, under Alternative 1, tracks would be installed along the southwest side of the PE ROW along this segment. To accommodate the track alignment, Alternative 1 would require the removal of an approximately 930-foot-long segment of the existing Paramount Bike Trail between Somerset Boulevard and Lakewood Boulevard. As part of Mitigation Measure LU-1 (Consistency with Bike Plans), this segment of the existing bike trail would be realigned to the north side but within the PE ROW in this area. The relocation of this segment of the Paramount Bike Trail would require users of the bike trail to cross the railroad tracks at Lakewood Boulevard to access the bike trail across the street. Although segments of the Paramount Bike Trail would be realigned, the bike trail would remain operational and the existing segment east of Lakewood Boulevard would remain. The City is very concerned about the safety of the bicyclists and pedestrians especially during the LRT's busiest periods when headways will be around 2 ½ minutes. How will the safety of Trail users be addressed with the relocation of the Paramount Bike Trail? CC-12-96

10. Table 5.56. Station Parking Facility Demand – Alternative 2 (Page 5-71) – The parking supply for the I-105/C Line station will be 326 spaces while the parking supply for the Paramount/Rosecrans station will be 490 parking spaces. The parking demand for the I-105/C Line station will be 450 spaces while the parking demand for the Paramount/Rosecrans station will be 530 parking spaces. The I-105/C Line station is underparked (deficient) by 124 spaces while the Paramount/Rosecrans station is deficient by 40 spaces. The report concludes (Page 5-71): "unutilized on-street parking is available at the I-105/C Line, Paramount/Rosecrans, Bellflower, and Pioneer Stations to meet the excess parking demand. Therefore, spillover parking impacts would not occur at these four stations." The City disagrees with this conclusion. The use of on-street parking is a spillover parking impact of the WSAB project. The proposed mitigation measures (TRA-21: Parking Monitoring and Community Outreach, and TRA-22: Parking Mitigation Program (Permanent)) may be helpful but could be avoided if the parking supply at the Stations satisfy the estimated demand. The I-105/C Line and Paramount/Rosecrans stations should provide a parking supply to accommodate the Projected 2042 Parking Demand. CC-12-97

11. Table 5.57. Station Parking Facility Demand – Alternative 3 (Page 5-73) – Under this Alternative, the parking demand for the I-105/C Line station will be 240 spaces (86 excess spaces) while the parking demand for the Paramount/Rosecrans station will be 300 parking spaces (190 excess spaces). This indicates that the projected parking demand will be accommodated within the Stations under Alternative 3. CC-12-98

12. Section 7.3.2.2 Traffic Operations Effects (Page 7-25) – The construction impacts to the City are not clearly identified. This section describes general impacts to traffic circulation. Mitigation measure TRA-20, Transportation Management Plan (TMP) "will address construction impacts on transportation facilities under the jurisdiction of all involved cities and agencies, including Caltrans." We are requesting the EIS/EIR, and the Transportation Impact Report indicate the timing of construction for those project elements located in the City of Paramount. During construction activities, the City is concerned with construction dirt/debris tracking to and from the construction sites. Street sweeping by the contractors should be required beyond the construction zones. Compensation to the City should be made if City forces are required to sweep excess construction dirt/debris. CC-12-99 CC-12-100

Thank you for your attention to the abovementioned concerns. You are welcome to contact Planning Director John Carver at jcarver@paramountcity.com with any questions.

CITY OF PARAMOUNT

John Moreno
City Manager

City of Paramount – CC-12

Comment ID	Response
CC-12-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-12-2	See response CR-GEN-1 regarding identification of the Locally Preferred Alternative (LPA) and study of a future extension to LA Union Station. A financially constrained funding plan is currently not available for the extension to Union Station north of the Slauson/A Line Station.
CC-12-3	See response to comment CC-12-2.
CC-12-4	See response CR-FIN-1.
CC-12-5	Figure 1-1 in Chapter 1, Section 1.2.2 has been revised and text has been updated in the Final EIS/EIR to clarify jurisdictions within the study area. A label for the City of Long Beach has been added, and the label for the City of Hawaiian Gardens has been corrected.
CC-12-6	The purpose of Chapter 1, Section 1.3 of the Draft EIS/EIR is to provide an overall description of the 98-square mile WSAB corridor Study Area that extends over 20 miles from downtown Los Angeles to the City of Artesia. Section 1.3.1 outlines population and employment densities, and the narrative in Section 1.3.2 provides a general summary of the types of activity sites within the Study Area, including employment centers. Additional detail, where applicable, is provided within the analysis of each environmental topic included in Chapter 4 of the Draft EIS/EIR. Chapter 4, Section 4.1.2, provides a general description of land uses in the affected area within the City of Paramount. Section 4.2.2 further characterizes the Paramount community and includes employment numbers within 0.5 mile of each station. Section 4.2 (Communities and Neighborhoods, Section 4.20 (Growth-Inducing Impacts), and Section 4.21 (Cumulative Impacts) of the Draft EIS/EIR discuss growth and development as it relates to the Project.
CC-12-7	Table 1.3 of the Draft EIS/EIR summarizes some of the highest peak-hour travel times along three major arterials that are representative of the high-volume north-south and east-west streets in the Study Area. Table 3.4 in the Draft EIS/EIR provides a summary of the major roadway facilities in the Study Area. In the Final EIS/EIR, Table 3.4 in Chapter 3 has been updated to include Paramount Boulevard in the listing of roadways for the City of Paramount. The analysis of impacts was not completed for roadway segments, but for individual intersections, so the inclusion or exclusion of arterials from these tables did not affect the impact analysis. The traffic analysis methodology is summarized in Chapter 3 of the Draft and Final EIS/EIR.
CC-12-8	See response CR-GEN-2 regarding identification of the Bellflower maintenance and storage facility (MSF) as a component of the LPA. The Paramount MSF is not part of the LPA, and no acquisitions or displacements related to the proposed Paramount MSF site option will occur.
CC-12-9	See response CR-GEN-2 regarding identification of the Bellflower MSF site. See also response to comment CC-12-8. The Bellflower MSF is designed in accordance with the Metro Rail Design Criteria, similar to other maintenance facilities along Metro's system, including the Santa Monica Light Rail Maintenance Facility. The plans for the MSF facility are included in Appendix B of the Final EIS/EIR. Specific facility design, such as building materials and architectural features, will be determined during future stages of design.

Comment ID	Response
CC-12-10	The I-105/C Line Station concept shown in Figure 2-16 in Chapter 2 of the Draft EIS/EIR illustrates the parking and station access for WSAB at the I-105/C Line Station. Design drawings with additional detail for the station, including access, were included in Appendix B of the Draft EIS/EIR. Design plans for the C Line infill station were also included in Appendix B of the Draft EIS/EIR on sheets T-269 to T-271. Since circulation of the Draft EIS/EIR, the parking facility at the station was reconfigured, a new driveway to the facility was added at Century Boulevard, and Façade Avenue has been modified to an emergency exit only from the I-105/C Line infill station (rather than a station entrance and exit). Figure 2-14 in the Final EIS/EIR has been updated to reflect these refinements.
CC-12-11	The comment regarding station elements is acknowledged. The I-105/C Line Station elements noted in the comment are correct.
CC-12-12	Since circulation of the Draft EIS/EIR, the park-and-ride facility proposed for the I-105/C Line Station was reconfigured. Specifically, the dedicated transit parking on the west side of the freight tracks was removed and the parking facility on the east side of the freight tracks was expanded to the north. A new driveway to the facility was also added at Century Boulevard. The updated figure is included as Figure 2.14 in Chapter 2 of the Final EIS/EIR. Nighttime and weekend construction may be required to minimize potential impacts, including to traffic on I-105 during the peak travel periods, and to accommodate construction scheduling for specific work activities. It has not been determined at this stage in the project development process if nighttime construction will be needed at I-105. If nighttime construction were to occur, Draft EIS/EIR Mitigation Measure NOI-8 (Noise Control Plan) requires Metro to develop a noise control plan to demonstrate compliance with the Federal Transit Administration (FTA) noise criteria and city requirements (this measure is referred to as Mitigation Measure NOI-6 in the Final EIS/EIR). If nighttime construction is planned between 8:00 p.m. and 7:00 a.m., an application for a noise variance or construction permit will be submitted to the City.
CC-12-13	Safety and security at all proposed WSAB stations will be consistent with the approaches used throughout the Metro system. Metro will follow Metro station design guidelines. See responses CR-SAF-1 regarding safety and security and CR-SAF-3 regarding security patrols and enforcement.
CC-12-14	In response to this comment and coordination with the City of Paramount in 2022 and 2023, access to and from the I-105/C Line infill station will be via the pedestrian walkway located along the new light rail transit bridge (LRT). The access point at Façade Avenue has been modified to accommodate emergency egress only. Stairs and/or escalators will be provided in addition to elevators in order to maintain transfers in the event that the elevators require maintenance. These project refinements were included in the analysis in the Final EIS/EIR and do not affect the impact conclusions of the Draft EIS/EIR. Metro Systemwide Station Design guidelines specific to safety and security include guidance on sightlines to station stairs/elevators. Pedestrian bridges will be well lit and provide a safe crossing for pedestrians and bicyclists.
CC-12-15	Based on design changes made after circulation of the Draft EIS/EIR, the existing Façade Avenue and Arthur Avenue pedestrian bridges will no longer need to be demolished and reconstructed as part of the Project. See response to comments CC-12-13 and CC-12-14 regarding safety and security.

Comment ID	Response
CC-12-16	See response to comment CC-2-10 regarding the modifications to the I-105/C Line Station design since the Draft EIS/EIR. Parking has been consolidated along the eastern side of the WSAB station, along Century Boulevard and Industrial Avenue. See response CR-TRA-1 regarding spillover parking. Discussion about displacements is provided in Chapter 4, Section 4.3 (Acquisitions and Displacement) of the Draft EIS/EIR, and impacts to the surrounding community as it relates to displacements is provided in Section 4.2 (Communities and Neighborhoods) of the Draft EIS/EIR. The Draft EIS/EIR concluded that the acquisition of commercial and residential properties may result in the displacement of several businesses and residents. However, these acquisitions and displacements will not affect the overall function of community assets or adjacent and surrounding uses, and no community assets would be displaced. Residential neighborhoods and community assets would not be isolated, and residential neighborhoods and community assets would be maintained.
CC-12-17	This station will be a key transfer point to the infill C Line Station. Projected boardings at the 105/C Line Station are high compared to the other project stations along the WSAB alignment, supporting the utility of the station beyond a transfer location. The design included in the Draft and Final EIS/EIR will require an approximate 700-foot walk between the I-105/C Line Station north of Century Boulevard and the infill C Line Station in the median of the I-105. Elevators, escalators, and/or stairs will be provided to support transfers between the I-105/C Line Station and infill C line Station. Based on coordination with the City of Paramount after circulation of the Draft EIS/EIR, Façade Avenue has been modified to emergency egress only. Access and egress to the I-105/C Line infill station will be via vertical circulation elements at the LRT bridge.
CC-12-18	The traffic analysis conducted for the Project is detailed in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*, included as Appendix D of the Draft EIS/EIR, and summarized in Chapter 3 of the Draft EIS/EIR. The SimTraffic tool considers the effects of queues on adjacent intersections. Table 3-14 in Chapter 3 of the Draft EIS/EIR summarizes the results of the analysis for the intersections of Paramount Boulevard/Rosecrans Avenue (No. 76) and Bianchi Way/Rosecrans Avenue (No. 77). The station will be grade separated and, therefore, the LRT tracks will not affect operation of the roadway network. Adverse impacts are not identified at either location. Refer to response CR-SAF-4 regarding pedestrian safety. The queuing analysis is detailed in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. The results show that queueing is not projected to exceed available storage on Rosecrans Avenue. Additionally, Project Measure TR PM-1 (Pre-signals and Queue-cutter Signals) and TR PM-2 (Lane Configurations) will minimize the potential for vehicle queuing.
CC-12-19	The station parking at the Paramount/Rosecrans Station is shaded and labeled in Figure 2-17 in Chapter 2 of the Draft EIS/EIR. The figure also identifies the locations where vehicles will access the park-and-ride. Additional details are included in the design plans (Sheet A14-001) in Appendix B of the Draft EIS/EIR.

Comment ID	Response
CC-12-20	Figure 2-32 in Chapter 2 of the Draft EIS/EIR identified the general locations of freight realignment. Design plans for the LRT alignment and locations with freight realignment were depicted in Appendix B of the Draft EIS/EIR. The plans have been updated since circulation of the Draft EIS/EIR as a result of coordination with Union Pacific Railroad and the Port of Long Beach and Port of Los Angeles. The updated plans are included in Appendix B of the Final EIS/EIR. Key updates to freight alignment include swapping the location of freight and LRT tracks along the La Habra Branch and updating design to include refinements to the LPA in consideration of maintaining freight spur track connections north of Rayo Avenue to the west side and just north of Imperial Highway to accommodate a spur connection to the east side. As stated in response to comment CC-12-8, the Paramount MSF option is not included as a component of the LPA.
CC-12-21	Refer to the response to comment CC-12-8.
CC-12-22	Refer to the response to comment CC-12-8.
CC-12-23	Refer to the response to comment CC-12-8.
CC-12-24	As stated in Chapter 2, Section 2.5.2 of the Draft EIS/EIR, bike hubs may include bicycle racks, lockers, secure bike parking, and on-call mechanics.
CC-12-25	Stations will be designed to be consistent with Metro's Systemwide Station Design Standards, which has elements of variability to relate the station area to the visual character and identity of the surrounding community, including public art and landscaping. Metro will work closely with local community arts and culture representatives throughout the implementation of the project art program. An art review panel, which will include arts professionals connected to the project corridor communities, will make recommendations for the commission of artists.
CC-12-26	Comment noted. See responses to the City's specific comments related to noise and attendant impacts.
CC-12-27	Updated information on the construction schedule of the LPA is included in Chapter 2, Section 2.5.2.7, Chapter 3, Section 3.7, and Chapter 4, Section 4.19.2 of the Final EIS/EIR. While the Draft and Final EIS/EIR provide general durations based on Project goals and milestones, it is not possible at this phase of the Project's planning process to develop a detailed construction schedule. The specific construction schedule will be informed by such factors as the availability of the construction contractor(s) workforce, equipment, and materials, value engineering, and stakeholder coordination. Specific information on timing will be determined by Metro and the construction contractor(s) prior to the start of construction, taking into account these and other related factors. Impacts will be in compliance with the Final EIS/EIR. Many of the project measures and mitigation measures in the Draft EIS/EIR are applicable to the LPA during construction and are not necessarily location specific. However, the Draft EIS/EIR concluded that for Alternative 3, adverse and unmitigated impacts could still occur for certain topics, including traffic and noise during construction. The Final EIS/EIR presents the project measures and mitigation measures specific to the LPA.

Comment ID	Response
CC-12-28	As part of Mitigation Measure COM-1 (Construction Outreach Plan), Metro will develop a Construction Outreach Plan in coordination with affected communities and businesses. The plan will include elements to maintain access to businesses. Additionally, Mitigation Measure TRA-20 (Transportation Management Plan[TMP]) (identified as Mitigation Measure TRA-18 in the Final EIS/EIR) involves preparation and implementation of a TMP to address construction impacts on transportation facilities. The TMP will be developed and coordinated with the applicable local jurisdictions. Section 5.5.2.1 has been added to the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* and Section 3.4.5 has been added to Chapter 3 of the Final EIS/EIR to document the analysis of impacts associated with trucks (vehicular freight). The analysis did not identify any substantive changes to traffic patterns or the affected routes for heavy trucks and other commercial vehicles during operation of the Project in the City of Paramount. There will be no changes to the physical roadway network (e.g., street closures) and there will be no adverse effects associated with the changes in delay at intersections in the City. Trucks will continue to be restricted to designated truck routes.
CC-12-29	Appendix A and Appendix B of the *West Santa Ana Branch Transit Corridor Project Final Displacements and Acquisitions Impact Analysis Report* (Appendix H of the Draft EIS/EIR) provides details for each parcel that will be affected by the LPA (referred to as Alternative 3 in the Draft EIS/EIR). The information has been updated to reflect design refinements to the LPA made since circulation of the Draft EIS/EIR. Refer to the updated *West Santa Ana Branch Transit Corridor Project Final Displacements and Acquisitions Impact Analysis Report* for updated information. Based on the design refinements, two businesses (industrial and automotive) in the City of Paramount will be displaced to accommodate the Paramount/Rosecrans Station parking facility. In-city relocation of businesses and residences was analyzed in the Draft EIS/EIR. As discussed in Chapter 4, Section 4.3.3.8, under subheading "Replacement and Relocation," a gap analysis was "conducted to identify available replacement sites for lease and sale within each city and 6 miles of each affected property based on market conditions and vacancy as of June/July 2020." Table 4.3.7 summarizes the gap analysis, which determined that a sufficient number of comparable replacement sites are available for automotive and industrial businesses in the City of Paramount. Chapter 4, Section 4.3.3.2 of the Final EIS/EIR has been updated based on refinements to the LPA and the gap analysis based on market conditions and vacancy as of June/July 2023. Table 4.3.5 of the Final EIS/EIR summarizes the gap analysis and shows that a sufficient number of comparable replacement sites are still available for automotive and industrial businesses in the City of Paramount. See response CR-DIS-1 regarding compliance with the Uniform Act and California Relocation Act. As compliance with the Uniform Act and California Relocation Act are federal and state requirements, they are not considered mitigation.
CC-12-30	See response CR-TRA-1 regarding transit parking and the spillover parking analysis. As stated in Chapter 3, Section 3.4.4.4 of the Draft EIS/EIR, the demand for parking at the Paramount/Rosecrans Station under Alternative 3 would be accommodated with the parking supply at this station. Parking demand from the Metro Travel Demand Model was updated in Chapter 3, Section 3.4.4.2 of the Final EIS/EIR to include all nine stations along the LPA. Consistent with the Draft EIS/EIR, the supply of parking at the Paramount/Rosecrans Station will accommodate demand.
CC-12-31	See response CR-TRA-1 and response to comment CC-12-30.

Comment ID	Response
CC-12-32	See response to comment CC-12-7.
CC-12-33	The traffic operations analysis does not indicate impacts at these two intersections. As the comment suggests, the level-of-service remains the same, or in one case, improves because the Bianchi Way intersection is changed from four-legged to three-legged. As stated in response to comment CC-12-8, the Paramount MSF is not a component of the LPA.
CC-12-34	As stated in response to comment CC-12-8, the Paramount MSF is not a component of the LPA.
CC-12-35	The design and location of the Paramount Bike Trail has been, and will continue to be, coordinated with the City of Paramount as the Project progresses. Pedestrian crossing gates are proposed at the Lakewood Boulevard crossing where the bike trail will be relocated to prevent illegal crossings, and bicyclist safety will be maintained.
CC-12-36	See response CR-TRA-1 and response to comment CC-12-30. As stated in Chapter 3, Section 3.4.4.4 of the Draft EIS/EIR, the demand for parking under the LPA (referred to as Alternative 3) would be 240 spaces at the I-105/C Line Station and 300 spaces at the Paramount/Rosecrans Station. Table 3-20 in the Final EIS/EIR includes updated station parking demand. The supply of parking at the I-105/C Line Station and Paramount/Rosecrans Station will accommodate demand.
CC-12-37	Refer to the response to comment CC-12-17.
CC-12-38	Refer to the response to comment CC-12-18.
CC-12-39	Part of Mitigation Measure LU-1 (Consistency with Bike Plans) discussed in Chapter 4, Section 4.1.4.2 of the Draft EIS/EIR requires action by the agency with jurisdiction over the future, planned facility. Because elements of the mitigation measure are not within Metro's jurisdiction, and may not occur, the analysis conservatively concluded that the Project could result in adverse impacts despite identifying this mitigation measure as a means to minimize or avoid such impacts. This measure is not deferred mitigation as it states that coordination will occur prior to construction and includes the specific performance standard that the proposed plan amendments demonstrate that bicycle facilities would be connected during Project operation. Please note that the portion of the measure quoted in the comment is specific to future, planned facilities and not existing facilities. The mitigation measure states that Metro would relocate portions of the Paramount Bike Trail and Bellflower Bike and Trail segments. Coordination on the relocation of these bike facilities has been ongoing.
CC-12-40	Refer to the response to comment CC-12-8.
CC-12-41	Refer to the response to comment CC-12-17.
CC-12-42	Design of the LPA was refined after circulation of the Draft EIS/EIR in response to comments and stakeholder coordination. As a result of these design refinements, implementation of the LPA will not result in residential displacements within the City of Paramount. Therefore, the residential displacements previously identified within the City in the Draft EIS/EIR are no longer identified in the Final EIS/EIR. Temporary construction easements and permanent acquisitions will be required along the rear of properties along Arthur Avenue and Façade Avenue, but no residential units will be affected by construction and operation of the Project. See response CR-DIS-1 regarding compliance with the Uniform Act and California Relocation Act.
CC-12-43	Refer to the response to comment CC-12-42.

Comment ID	Response
CC-12-44	Information in Chapter 4, Section 4.3 in the Draft EIS/EIR regarding occupants comes from the U.S. Census Bureau's Quick Facts tool (U.S. Census Bureau 2012-2016), which was used to determine the average number of persons per household for each city in which residential acquisitions are anticipated. This tool was also used to estimate the number of residents displaced based on the number of residential units to be acquired. Displaced mobile homes were assumed to contain the same number of occupants as the average conventional household in the same city. In the Draft EIS/EIR, the estimated number of displaced residents was calculated using the average number of household occupants multiplied by the number of units displaced. As stated in response to CC-12-42, as a result of refinements to the LPA since circulation of the Draft EIS/EIR, implementation of the LPA will not result in residential displacements in the City of Paramount.
CC-12-45	See response CR-DIS-2 regarding updates to the acquisition and displacement data for the LPA in the Final EIS/EIR. Backyards are private open space areas. The loss of residential backyards is not expected to adversely affect public open space areas because the function of public open space in the surrounding area will not be adversely affected as a result of the Project (as explained in Chapter 4, Section of 4.16.3 of the Draft EIS/EIR). Metro will comply with the requirements of the relevant local jurisdiction regarding project effects on trees. Mitigation Measure BIO-4 (Protected Trees) in the Draft EIS/EIR requires an Arborist Study prior to the removal of any protected trees and the preparation of a tree protection plan. Under Project Measure BIO PM-3 (LA Metro Tree Policy) (a new project measure included in the Final EIS/EIR) the Project will adhere to the LA Metro Tree Policy, adopted on October 27, 2022, by the Metro Board of Directors. The policy requires the preparation of a tree protection plan identifying tree protection zones for trees designated for retention. Where tree removal is required, project design will include an approach that either replaces removed trees at a ratio of 2:1 or replaces in-kind with trees that are a minimum size of 36-inch standard box (i.e., young trees with a large root ball). Metro will consult with the City of Paramount, in addition to community stakeholders, prior to selecting the appropriate location for planting replacement trees. This measure is included in Chapter 4, Section 4.19.3.8 of the Final EIS/EIR. The LPA is not expected to degrade air quality. As discussed in Chapter 4, Section 4.5.3 of the Draft EIS/EIR, the Project will not introduce a new substantial direct source of air pollutant emissions. The Project will improve regional air quality by taking passenger vehicle trips off the roadway network and encouraging alternative and active modes of transportation.
CC-12-46	Refer to the response CC-GEN-2.
CC-12-47	Refer to the response CC-GEN-2.
CC-12-48	Refer to the response to comment CC-12-8.

Comment ID	Response
CC-12-49	See response to comment CC-12-8 and CC-12-42. Based on design refinements to the LPA since circulation of the Draft EIS/EIR, Table 4.3.2 in Chapter 4, Section 4.3 of the Final EIS/EIR has been updated to represent the permanent property acquisitions for the LPA. Approximately 48 parcels in the City of Paramount will be permanently affected by the LPA; 3 permanent full acquisitions that will be required for the Paramount/Rosecrans parking facility and 54 permanent partial acquisitions that will be required to accommodate pedestrian access and access roads, permanent aerial easements, columns, grade crossings, traction power substations, and LRT track. A total of approximately 250,600 square feet of land area will need to be permanently acquired for the Project within the City of Paramount. Table 4.19.4 in Chapter 4, Section 4.19.3.3 of the Final EIS/EIR has been updated to represent the construction-related property acquisitions for the LPA. Approximately 37 parcels will be affected by construction activities; 3 permanent full acquisitions will be required for construction laydown areas (that will also be used as the site for the Paramount/Rosecrans parking facility) and 37 temporary construction easements will be required for pedestrian access and construction easements. A total of approximately 260,500 square feet of land area will need to be temporarily acquired for construction. It should be noted that "parcels" is not a total sum of the full and partial acquisitions. More than one partial acquisition may occur on a single parcel.
CC-12-50	Refer to the response to comment CC-12-8.
CC-12-51	Refer to the responses to comments CC-12-8 and CC-12-42.
CC-12-52	A new visualization of the Paramount/Rosecrans Station has been included in Chapter 4, Section 4.4.3.2 of the Final EIS/EIR and Chapter 5, Section 5.2.5 of the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* (previously Appendix I to the Draft EIS/EIR). Stations will be consistent with Metro's Systemwide Station Design Standards, which include consistent architectural language using high performance, state-of-the art materials and finishes of materials and elements for a consistent design approach, with elements of variability (art and landscaping) to respond to the surrounding community. Station areas will be designed to be sensitive to the specific urban context at each station, which includes the elements discussed in Table 4.4-7 in Chapter 4, Section 4.4 of the Draft EIS/EIR and Table 5.6 of the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report.* Per Metro Rail Design Criteria, guideways are required to have a consistent design with a size and shape that minimizes its scale and bulk. The scale, color, material, texture, and lighting are required to be designed to integrate the LRT into its surroundings. The Metro Rail Design Criteria also requires that sustainable landscaping be provided for stations and landscaping should add to the character and identity of the existing neighborhood and is responsive to and complementary with station architecture, art, signage, graphics, and lighting design. Thus, consistent with the conclusions in Table 4.4-8 of the Draft EIS/EIR and Table 5.6 of the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report,* the Paramount/Rosecrans Station will be compatible with the visual character and quality of the Affected Area and will not include features that will detract from the visual character and quality of the Affected Area.
CC-12-53	Metro has a graffiti program that requires removal of graffiti within 24 hours of when it is reported and uses anti-graffiti coating where possible. All surfaces within station public areas (within the touch zone) will have anti-graffiti coatings. A maintenance agreement will be entered into separately between Metro and the City of Paramount once the design is farther along. Maintenance discussions will typically start at the 65% to 85% design stages.

Comment ID	Response
CC-12-54	Additional text has been added to Mitigation Measure VA-1 (Screening at Somerset Boulevard) in Chapter 4, Section 4.4.4.2 of the Final EIS/EIR and Chapter 8, Section 8.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* to ensure that, if the existing screening wall and/or landscaping is removed, the replacement screening wall and landscaping are at least as decorative in terms of design, materials, and screening height as the existing wall and landscaping.
CC-12-55	The particulate matter emissions presented in the Draft EIS/EIR included vehicle exhaust emissions, brake wear emissions, tire wear emissions, and resuspended road dust emissions. The average vehicle exhaust emissions will be reduced in the future through fleet turnover and newer vehicles meeting more stringent emissions standards. The brake wear, tire wear, and resuspended dust emissions do not decrease in future years on an average per-vehicle basis, and collectively those emissions make up over 95% of the particulate matter emissions from on-road regional vehicle miles traveled (VMT) presented in the Draft EIS/EIR. Therefore, the increase in regional VMT produces a proportionate increase in emissions of these dust sources that more than offsets the decrease in exhaust emissions from improved fuel efficiency and emissions standards. The phrase "deposition of dust on roads will be reduced" is intended to describe the action of vehicle travel re-suspending dust in the air that has settled on the roadway from a variety of sources, including regional sources of particulate matter emissions. In future years, less fugitive dust will settle on local roadways if regional particulate matter emissions decline with regulatory actions implemented by air pollution control agencies. Regardless, the identified phrase is not necessary to support the impact conclusions included in Chapter 4, Section 4.5 of the Draft EIS/EIR. As discussed in Section 4.5.1.2 of the Draft EIS/EIR, the impact analysis was completed in accordance with guidance established by the South Coast Air Quality Management District (SCAQMD) and the Federal Transit Administration (FTA).
CC-12-56	Indirect air pollutant emissions associated with electric-generating facility operations are not included in the air quality analysis for the Project because those emissions are regulated through permitting programs run by the SCAQMD or another appropriate permitting agency outside of the SCAQMD boundary. Those emissions have already been accounted for in the regional emissions inventory, and the Project will not require the expansion of existing production levels to meet demand. However, it is customary to account for all direct and indirect sources of emissions for the greenhouse gas (GHG) emissions assessment; therefore, the off-site electricity generation emissions are included in the information presented in Chapter 4, Section 4.6 of the Draft EIS/EIR.
CC-12-57	See response CC-GEN-2. The Draft EIS/EIR quantified and disclosed emissions of air pollutants that would be generated during operation of both MSF site options, as presented in Table 4.5.15 in Chapter 4, Section 4.5 of the Draft EIS/EIR. Operational emissions from the MSF would not exceed any applicable regional or localized significance threshold for mass daily emissions established by SCAQMD.
CC-12-58	See response to comment CC-12-57.

Comment ID	Response
CC-12-59	The Draft EIS/EIR accounted for indirect GHG emissions resulting from electricity generated to power the light rail vehicles. As noted in the GHG emissions analysis, Metro has prepared studies and emission inventories that quantify the amount of electricity needed to power a light rail line based on revenue miles traveled for the line. Annual Metro rail revenue miles traveled, and the associated electricity consumption, were used to estimate an average per-revenue-mile consumption factor for Metro rail propulsion in the analysis. Table 4.6.2 of the Draft EIS/EIR presents the annual LRT revenue miles that would occur with implementation of the Build Alternatives. The GHG emissions analysis focused on estimated GHG emissions, rather than presenting the energy consumption associated with operation of the LRT corridor. Reporting the annual electricity consumption would have been an intermediate step that would not have altered the GHG emissions analysis. The calculated electrical consumption factor can be found in the *West Santa Ana Branch Transit Corridor Project Final Greenhouse Gas Emissions Impact Analysis Report* (Appendix K to the Draft EIS/EIR). Underlying calculations determined that LRT corridor operations would produce 6.75 pounds of carbon dioxide equivalents (6.75 lbCO2e) per LRT mile traveled.
CC-12-60	See response to comment CC-12-59.
CC-12-61	The noise analysis was conducted consistent with FTA guidelines, which includes grouping similar sensitive receivers (such as a group of single-family residences) into clusters. The results of the analysis are applied to the cluster as a whole, as they are representative of what will be experienced in that area. Figures 4.7-5 through Figure 4.7-11 in Section 4.7.4 of the Draft EIS/EIR identified locations of LRT noise impacts remaining after mitigation and soundwall locations. Figure 4.7-12 and Figure 4.7-13 in Section 4.7.4 of the Draft EIS/EIR identified freight noise impacts after mitigation. Additional figures are included in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR).
CC-12-62	See response CR-GEN-2.
CC-12-63	Figures 4.7-5 through Figure 4.7-11 in Section 4.7.4 of the Draft EIS/EIR identify locations of LRT noise impacts remaining after mitigation and soundwall locations. Soundwalls are also illustrated in the LRT plan set included in Appendix B of the Draft and Final EIS/EIR. Mitigation Measure NOI-1 notes the approximate location of soundwalls by street as well. Additional figures are included in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR), which provides a detailed look at each segment. The visual impact analysis in the Draft EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* (Appendix I of the Draft EIS/EIR) included an analysis of how soundwalls would affect visual character, viewer sensitivity, and visual quality. The Final EIS/EIR and the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report* prepared in support of the Final EIS/EIR have been updated to reflect modifications to the soundwalls. Tables in Chapter 4, Section 4.4 of the Final EIS/EIR identify the location and height of soundwalls and the corresponding analysis.

Comment ID	Response
CC-12-64	Soundwalls are proposed as mitigation to block the sound generated by the wheels as they travel over the rail; therefore, the soundwall does not need to be the height of a freight vehicle to mitigate for LRT traffic. Refer to the response to comment CC-2-6 regarding mitigation for relocated freight tracks. This area is represented by noise receptors N191 through N207 and N352. Noise levels before and after mitigation are shown in Table 4.7.11 in Section 4.7.4.2 of the Draft EIS/EIR. The soundwalls will reduce noise impacts to less than severe in this area. Additional analysis has been prepared since the Draft EIS/EIR to identify possible additional noise-reduction measures. The noise analysis in Section 4.7.3 and 4.7.4 of the Final EIS/EIR incorporates this additional analysis to identify possible additional noise reductions. Soundwalls for the relocated freight tracks in this area are anticipated to be heights of 12 to 16 feet, which will be verified during final design. The analysis included in Section 4.7.4.2 of the Final EIS/EIR shows that impacts will be reduced to no impact, with the exception of a remaining moderate impact at receptor N352. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report.* Residual noise impacts have been reduced since the Draft EIS/EIR. Materials such as vegetation provide minimal benefit in attenuating noise.
CC-12-65	Mitigation Measure NOI-4 (Crossing Signal Bells), included in the Draft EIS/EIR, requires approval from the California Public Utilities Commission (CPUC) for implementation; therefore, the noise attenuation reductions associated with shrouds was not included in the mitigated noise levels identified in Section 4.7.4 of the Draft EIS/EIR. Based on Metro's experience successfully implementing bell shrouds on other transit lines and coordination with CPUC subsequent to circulation of the Draft EIS/EIR, Mitigation Measure NOI-4 (Crossing Signal Bells) has now been incorporated as project measure (NOI PM-1) within the Final EIS/EIR and the associated reduction is included in the analysis. Project Measure NOI PM-1 (Crossing Signal Bells) remains subject to CPUC approval. Field testing of bell shrouds implemented on existing Metro LRT systems has shown bell shrouds are effective at controlling crossing-signal noise at the at-grade crossing. As shown in Chapter 2, Table 2.6 of the Draft EIS/EIR, headways on the WSAB alignment will be reduced late at night and in the early morning resulting in reduced occurrences of crossing signal noise. There are no at-grade crossings with crossing bell noise near Arthur Avenue or Façade Avenue. In this particular area, the only at-grade crossing with crossing bell noise is at Rosecrans/Paramount. This is over 1,000 feet from Arthur Avenue, but closer to other residential uses south of Rose Street. The existing crossing warning devices at that intersection provide a good indication of what will be experienced in the future.
CC-12-66	See response CR-GEN-2.

Comment ID	Response
CC-12-67	As shown in the Mitigation Measure NOI-1 (Soundwalls) table in Chapter 4, Section 4.7.4.2 of the Draft EIS/EIR, a soundwall will be located along both sides of the track, typically 8 feet in height, between I-105 and the junction near Rosecrans. The proposed soundwalls were also depicted in Figure 4.7-13 in Section 4.7.4.2 of the Draft EIS/EIR and on the LRT plans in Appendix B of the Draft EIS/EIR. The walls will likely be a solid sound-blocking wall. Once the LRT track transitions to elevated, there will be an 8-foot parapet wall on the retained fill along the LRT track then transitioning to a 6-foot wall along the aerial guideway. Refer to the response to comment CC-12-64 for information regarding the updated noise analysis in this location. Project Measure VA PM-8 (Residential Screening for Aerial Structures) has been added to Chapter 4, Section 4.4.4.1 of the Final EIS/EIR, as well as Section 8.1.1 of the *West Santa Ana Branch Transit Corridor Project Final Visual and Aesthetic Impact Analysis Report*, to provide screening elements to limit views of project components on the aerial structures from the residential backyards.
CC-12-68	Construction related to geotechnical, subsurface, and seismic impacts is discussed in Chapter 4, Section 4.19.3.9 of the Draft EIS/EIR. As stated in this section, potential impacts associated with construction will be minimized through compliance with the established design standards discussed in Chapter 4, Section 4.9 of the Draft EIS/EIR. Adverse effects were not identified, and mitigation is not required. As part of Project Measure GEO PM-3 (Geotechnical Design [Construction]), described in Section 4.19.3.9 of the Draft EIS/EIR, a number of geotechnical design reports are required for the Project in accordance with the Metro Rail Design Criteria. The California Department of Transportation and the County of Los Angeles Building Code also have design requirements for bridges, aerial structures, and building structures. Geotechnical report recommendations would be incorporated into the project plans and specifications. The design reports will also provide recommendations to be implemented during construction. The construction recommendations will address temporary excavations, ground settlement and ground loss, and oil and gas hazards, and will include construction monitoring plans.
CC-12-69	See response CR-GEN-2. The statement quoted from Chapter 4, Section 4.10.3.7 of the Draft EIS/EIR and referenced in this comment is accurate; however, the MSF site option located within the City of Paramount is not a component of the LPA.
CC-12-70	See response to comment CC-12-69.

Comment ID	Response
CC-12-71	The CARB EMission FACtor (EMFAC) on-road mobile source emissions inventory model is updated every few years to account for implementation of adopted regulations in future scenario years. However, the state goal established by ratification of the Advanced Clean Cars II rule that is referenced in the comment was promulgated in 2020 and only applies to new vehicles purchased in the state beginning in 2035. The EMFAC emission factors for on-road vehicles used in the Draft EIS/EIR analysis were produced from the EMFAC2017 iteration of the model and would not account for the statewide goal in the analysis year of 2042. Therefore, the energy savings from on-road vehicle travel as disclosed in Table 4.12.4 of the Draft EIS/EIR are likely conservative estimates in terms of reductions relative to Existing Conditions, given that future year petroleum fuels consumption would be reduced on average through implementation of the new rule. In preparing the Final EIS/EIR, a thorough review was conducted of updates to regulations, available data resources, and analytical tools pertaining to the environmental analyses contained within the Draft EIS/EIR. The analysis of changes in regional energy resource consumption associated with implementation of the LPA (Alternative 3) was updated accordingly using newer iterations of the CARB EMFAC model (EMFAC2021) and the California Emissions Estimator Model (CalEEMod Version 2020.4.0). Energy consumption factors within the EMFAC2021 on-road mobile source database account for recent regulatory commitments to enhance the prevalence of alternatively fueled vehicles throughout the state. The estimated annual energy savings in 2042 resulting from implementation of Alternative 3, as provided in the Draft EIS/EIR, was 123,011 MMBTU per year. The refined analysis to be included within the Final EIS/EIR determined that the LPA would result in an annual energy savings benefit of 126,706 MMBTU in 2042 using the updated regulatory model. Therefore, the LPA would result in a reduction in energy consumption relative to the No Build Alternative, although this represents a small change in overall energy consumption compared to the Affected Area for energy, defined in Section 4.12.1.2 as the geographic region served by the energy resource suppliers for electricity and natural gas.
CC-12-72	See response CR-GEN-2. Sections 4.13.2 and 4.13.3.2 of Chapter 4 of the Draft EIS/EIR summarize the educational, technology, and medical facilities identified within the electromagnetic field (EMF) study area (defined as the area within 1,000 feet of the project alignment). None of these facilities use highly EMF-sensitive equipment. The *West Santa Ana Branch Transit Corridor Project Final Electromagnetic Field Impact Potential Memorandum* (Appendix V to the Draft EIS/EIR) provides additional detail on land uses identified within the EMF study area.
CC-12-73	Refer to CR-GEN-2. Effects pursuant to Our Lady of the Rosary Church were evaluated in Chapter 5, Section 5.2.2 of the *West Santa Ana Branch Transit Corridor Project Revised Preliminary Cultural Resources Effects Report* (circulated as the Revised Preliminary Cultural Resources Effects Report, Appendix X of the Draft EIS/EIR) under the heading "Our Lady of the Rosary Church/14813-14819 Paramount Boulevard, Paramount." The assessment considered effects pursuant to Section 106 and impacts under CEQA from the project alignment and the Paramount MSF site option. Results were summarized in Chapter 4, Section 4.14.3.1 of the Draft EIS/EIR under the heading "Paramount MSF Site Option." Located on an urban thoroughfare, Our Lady of the Rosary Church is flanked by a drive-in theater and a business park, and it fronts a row of smaller commercial and residential properties. Its wider setting includes a variety of land uses and densities. Much of the surrounding development postdates the completion of the church by decades. The church's integrity of setting is largely diminished such that the addition of an MSF would not have further affected the church's visual character and setting.
CC-12-74	Refer to response to comment CC-12-73.

Comment ID	Response
CC-12-75	The loss of parking at Paramount Park will not result in adverse impacts; therefore, mitigation is not required. As stated in Chapter 4, Section 4.16.3.2, Alternatives 1, 2, and 3 would result in the loss of approximately 20 spaces of over 300 total. The remaining 280 on-site parking spaces would remain and off-site parking on Paramount Boulevard would not be affected. Therefore, the alternatives would not result in an adverse effect related to park parking.
CC-12-76	Chapter 4, Section 4.18.3.2 and Section 5.2.3.4 of the *West Santa Ana Branch Transit Corridor Project Final Safety and Security Impact Analysis Report* (previously Appendix F of the Draft EIS/EIR) have been updated to include evidence-based data supporting the design features. See response CR-SAF-4 regarding pedestrian and bicyclist safety at the at-grade portions of the Project. In addition, many of the at-grade locations along the project alignment incorporate safety features that are identified by the Federal Highway Administration as "Proven Safety Countermeasures" such as: ▪ Medians and pedestrian refuge islands (up to 56 percent reduction in pedestrian crashes) ▪ Flashing lights (up to 47 percent reduction in pedestrian crashes) These safety features are shown in Appendix B of the Draft EIS/EIR and Final EIS/EIR. As discussed in Sections 4.18.3 and 4.19.3.18 of the Draft EIS/EIR, the Project will not result in adverse effects related to safety and security. See response CR-SAF-3 regarding security patrols and enforcement. Security on the WSAB line, including at stations, will be provided by Metro's law enforcement and its contractors. Therefore, there will be no impact to the City of Paramount's contracted police services.
CC-12-77	See response to comment CC-12-8.
CC-12-78	Construction of the Project requires removal of the existing pedestrian bridge at Paramount High School. The Draft EIS/EIR proposed replacing the existing pedestrian bridge with a pedestrian undercrossing to maintain safe pedestrian connectivity. Based on stakeholder coordination since circulation of the Draft EIS/EIR, the pedestrian bridge will be replaced with a new pedestrian bridge rather than an undercrossing. Design of the pedestrian bridge has been incorporated into the Final EIS/EIR and is shown on plan sheet T-268 of Appendix B of the Final EIS/EIR. This change to a pedestrian bridge was included in the analysis in the Final EIS/EIR and does not alter the environmental impact conclusions of the Draft EIS/EIR. This change was also discussed during a meeting with the City of Paramount on July 19, 2022, and a conceptual exhibit was shared with the City at that time. Per the terms of the Master Cooperative Agreement, the City of Paramount will have opportunity to review the design plans as design progresses.
CC-12-79	Although the building is nearly 100 years old, the property is not eligible for listing under the National Register of Historic Places or the California Register of Historical Resources criteria due to significant alterations to the building, including the replacement of original doors and windows and the addition of stucco and brick veneer. The building lacks the necessary architectural integrity of materials, feeling, workmanship, and design to qualify for historic significance. The construction mitigation measures established in the Draft EIS/EIR will be applied as appropriate.
CC-12-80	In response to this comment, Chapter 3, Section 3.4.8 of the *West Santa Ana Branch Transit Corridor Project Final Parklands and Community Facilities Impact Analysis Report* (previously Appendix AA of the Draft EIS/EIR), has been updated to state that the Bellflower-Paramount Active Transportation Plan and the Bellflower-Paramount Bike and Trail Master Plan are complementary documents. This revision does not alter the environmental analysis contained in the Draft EIS/EIR.

Comment ID	Response
CC-12-81	Not all referenced documents are currently available online. Should a reviewing agency require additional supporting information for review, they may contact Metro to obtain copies of digitally available documents.
CC-12-82	In response to this comment, Synchro files have been added as an appendix to the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. The traffic analysis completed for the Draft and Final EIS/EIR considered existing roadway geometry and identified the mitigation needed for impacts from the Project, where feasible. No adverse impacts were identified in the City of Paramount, and therefore, no mitigation was proposed.
CC-12-83	The traffic analysis completed for the WSAB Project was based on forecasts to a horizon year of 2042. Increases in traffic for future development (i.e., after 2017) were accounted for at a regional level by applying growth rates obtained from the Metro Travel Demand Model (adapted from the Southern California Association of Governments model). Future projects, like the Paramount Petroleum AltAir Renewable Fuels Project, are captured in the ambient growth, which was developed from the model outputs. See response CR-GEN-4 regarding grade separation.
CC-12-84	Blank pages in the Final EIS/EIR have been updated to note "This page intentionally left blank." No change has been made to the supporting documents.
CC-12-85	The tables in the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (previously Appendix D to the Draft EIS/EIR) have been revised to note that the headways are shown in minutes.
CC-12-86	The reference to Figure 1-2 in Section 1.5.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D to the Draft EIS/EIR) is correct. The figure includes a photograph of current conditions at the existing Paramount Boulevard/Rosecrans Avenue crossing, which provides an example of one of the common configurations of at grade crossings illustrated in Figure 1-1.
CC-12-87	See response to comment CC-12-82 regarding Synchro files. Synchro default values, which represent common practice, were used in some cases. Consistent values for these input parameters were used to allow for a consistent comparison between intersections in different jurisdictions and in future years where both field conditions and overall traffic conditions (e.g., improved vehicle technology) may change. Specific parameters were: ▪ Saturation flow rate: 1,900 vehicles/hour/lane ▪ Lane width: 12 feet ▪ Grade: 0% ▪ Storage length (for pockets): field-measured or from 10% engineering plans, from the end of the taper length (full width of pocket) to the limit line ▪ Link speed: coded directly based on field speed limit ▪ Peak hour factor: 0.92

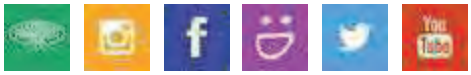
Comment ID	Response
CC-12-88	Train schedules were coded into Synchro's traffic simulation feature SimTraffic, although there are some limitations to the degree of detail of the schedules. To allow for a reasonable and accurate representation of the train crossing events for future train operations, a gate down event was coded at each train crossing location every 2.5 minutes. This approach represents a 5-minute headway for trains in both directions. It is correct to say that SimTraffic is a stochastic (random) process for vehicular traffic on the roads and there are different results with each run. To account for the variations, five SimTraffic runs were conducted and the average of the results was reported.
CC-12-89	Refer to response to comment CC-12-88.
CC-12-90	Figure 2-4 from the Draft EIS/EIR has been updated for the Final EIS/EIR to depict the LPA and better distinguish at-grade from aerial segments. Please refer to Figure 2.3 in Chapter 2 of the Final EIS/EIR.
CC-12-91	Updated parking surveys were conducted on select streets around the Gardendale Station, I-105/C Line station, and on streets within the City of Paramount. Surveys were conducted during non-holiday weekdays in March and May 2023 on Tuesdays, Wednesdays, and Thursdays between the hours of 6:30 a.m. and 8:30 a.m. and 11:00 a.m. and 2:00 p.m. The survey time periods were determined based on the surrounding land uses, which in these locations were mainly residential, and considered parking restrictions in each neighborhood. The results of the parking surveys are presented in Chapter 3, Section 3.3.7 of the Final EIS/EIR and Section 4.5.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* prepared in support of the Final EIS/EIR (previously Appendix D of the Draft EIS/EIR). A visual survey map is included in Appendix A of the report.
CC-12-92	See responses to comments CC-12-82 and CC-12-87.
CC-12-93	See response CR-GEN-4 regarding grade separation and response to comment CC-12-83 regarding the traffic analysis.
CC-12-94	Refer to the response to comment CC-12-8.
CC-12-95	As stated in response to comment CC-12-8, the Paramount MSF is not a component of the LPA.
CC-12-96	See response to comment CC-12-35 regarding the safety and design of the bike trail crossing at Lakewood Boulevard.
CC-12-97	See response comment CC-12-36.
CC-12-98	Refer to response to comment CC-12-36.
CC-12-99	Refer to response to comment CC-12-27.
CC-12-100	As described in Chapter 4, Section 4.19.3.5 of the Draft EIS/EIR, dust emissions from construction activity will be minimized by mandated compliance with SCAQMD Rule 403 (Fugitive Dust) and Rule 402 (Nuisance). Water trucks are proposed for dust control throughout the alignment during construction. Metro will also implement Project Measure AQ PM-1 (Metro Green Construction Policy) that requires construction activities to be conducted in accordance with Metro's Green Construction Policy, which includes best management practices related to dust control and mitigation strategies, such as the application of water or dust suppressants to unpaved areas to maintain soil moisture content and limiting vehicle speeds on unpaved areas to 15 mph. The policy requires that trucks or equipment hauling material such as debris or any fill material shall be fully covered while operating at, to, and from the Metro construction project.

City of Paramount

From: John Carver <JCarver@paramountcity.com>
Sent: Wednesday, October 13, 2021 11:23 AM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: John Moreno <JMoreno@paramountcity.com>
Subject: addendum to letter

Hi Meghna – attached is an addendum to our letter of September 28, 2021 regarding the WSAB EIS/EIR. CC-2-1

John Carver
Planning Director | City of Paramount
16400 Colorado Avenue, Paramount, CA 90723
562.220.2048 | jcarver@paramountcity.com



October 12, 2021

Ms. Meghna Khanna
Project Manager, Metro
One Gateway Plaza, M/S 99-22-7
Los Angeles, CA 90012

Subject: Addendum to September 28, 2021 letter – Review of the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the West Santa Ana Branch Transit Corridor (WSAB) Project

Thank you for the opportunity to submit this addendum to our September 28, 2021 letter. We request that the following be addressed in the final EIS/EIR.

Safety

1. Standard clearances for freight and guideway tracks require a minimum of 8'-6" to meeting CPUC general order requirements. Drawing TX-204 shows a clearance of 4' on Detail AM which needs clarification or correction. — CC-2-2
2. Show missing vertical clearances beneath the elevated guideway where the freight track will cross beneath. See enclosed markups. — CC-2-3
3. With the increase in freight train activity and new passenger service, consideration should be given to fencing of the corridor between Century Boulevard and Rosecrans Avenue to seal this corridor from potential homeland security threats to a dense residential and mostly Latino neighborhood. — CC-2-4

Noise

1. The soundwall and retaining wall limits are unclear between approximate Station 1089+50 to approximate Station 1108+00. Will soundwall and retaining wall limits overlap? — CC-2-5

2. Soundwalls proposed by the project will likely be designed to mitigate noise at its source, which typically includes train wheels and train horns. Train horns are blown at existing whistle board locations between approximate Station 1089+50 to approximate Station 1104+20. With the proposed elevated LRT guideway or viaduct, the sound of the horn blown ¼ mile in advance of crossings north (Century Boulevard) and south (Rosecrans Avenue) will be augmented with the elevated guideway. Therefore, consideration should be given to interrupt the line of sight between the freight train horn, typically 16 feet high on locomotive engines, and eaves of residential dwelling units for effective noise mitigation results. CC-2-6

3. All tracks (LRT and freight) within this segment (between approximate Station 1089+50 to approximate Station 1110+00) should have continuous welded rail. This will eliminate the bumping noise caused by bolted rail on the freight track which can be a significant noise source. In addition, low level soundwalls should be considered on the elevated guideway to avoid impacting the residential neighborhood with sound impacts due to wheel screeching in curved sections and above the height of proposed soundwalls. CC-2-7

Vibration

1. The close proximity of residential dwelling units to the freight track being shifted west by the WSAB Project, between approximate Station 1089+50 to approximate Station 1104+20, raises the need to consider adding "under ballast mats" to mitigate vibration impacts by freight trains on existing and proposed walls and residential dwelling units nearby. CC-2-8

General

1. Lead track and/or freight track alignment plans are referenced but are not included in the subject set of plans. CC-2-9

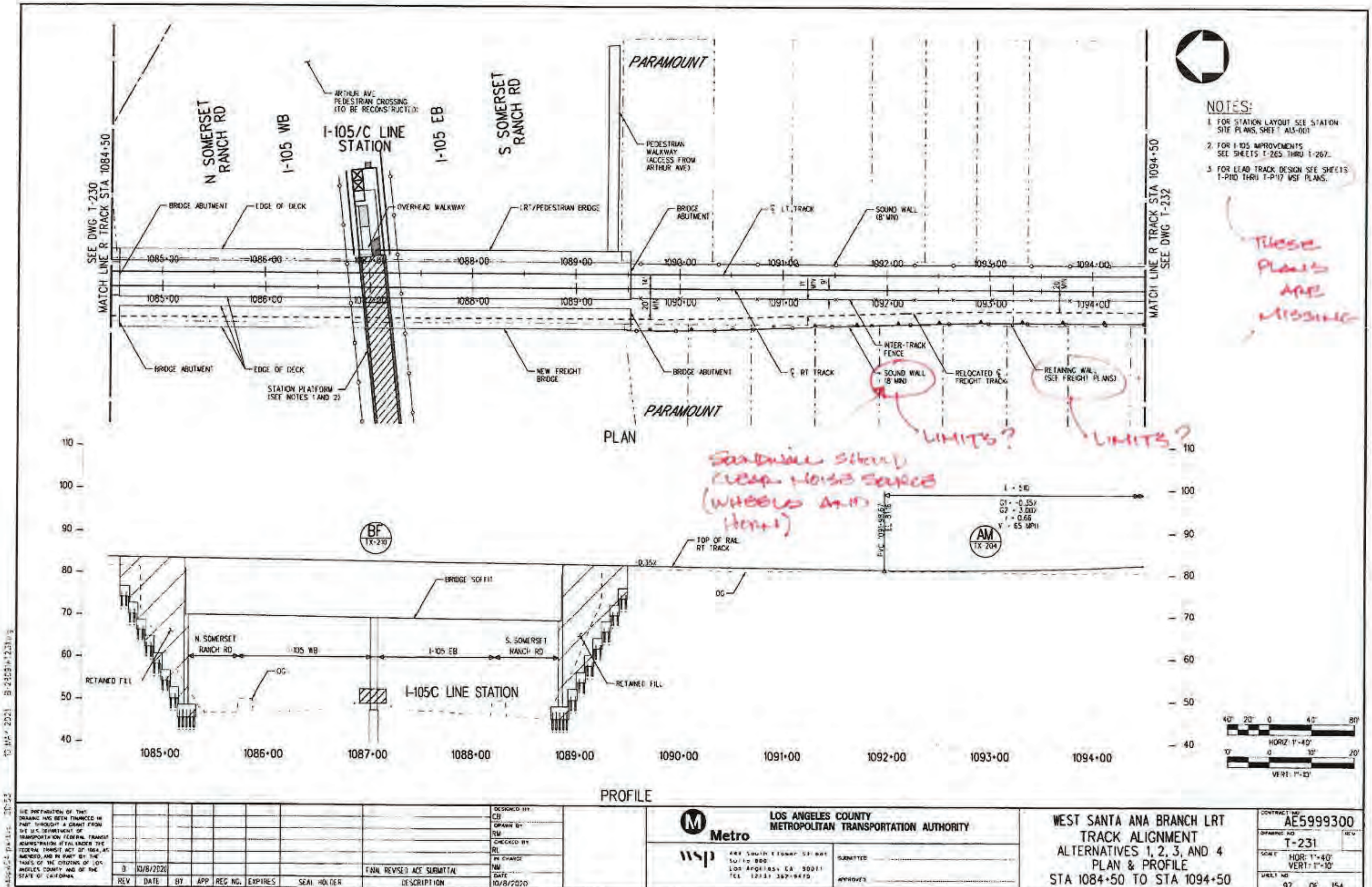
2. See enclosed markups.

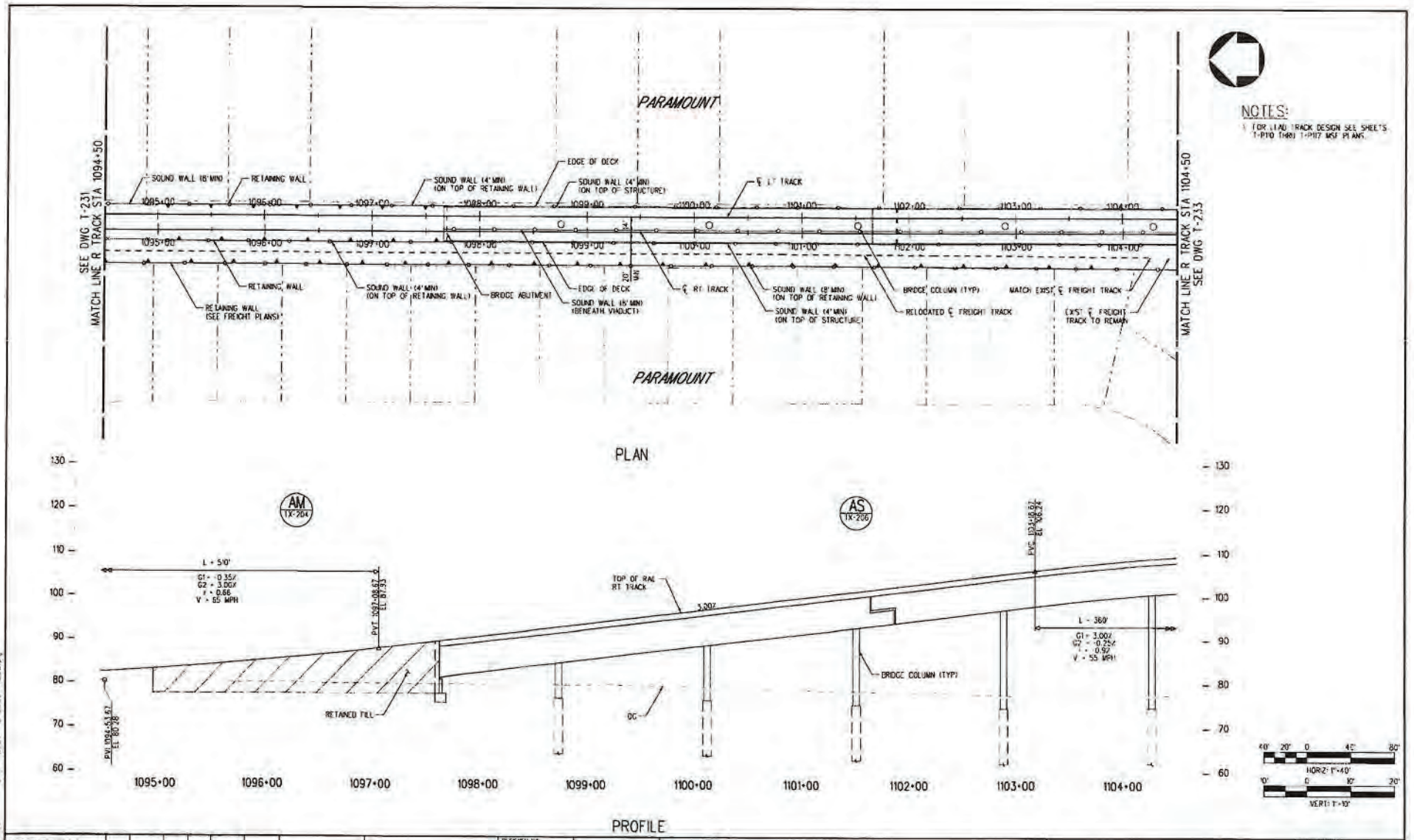
Thank you again for allowing us to add these additional comments.

CITY OF PARAMOUNT

John Moreno
City Manager

Enclosures


NOTES:
1. FOR STATION LAYOUT SEE STATION SITE PLANS, SHEET A13-001
2. FOR I-105 IMPROVEMENTS SEE SHEETS T-265 THRU T-267.
3. FOR LEAD TRACK DESIGN SEE SHEETS T-P10 THRU T-P17 WSF PLANS.
THESE PLANS ARE MISSING
MATCH LINE R TRACK STA 1084+50 SEE DWG T-230
MATCH LINE R TRACK STA 1094+50 SEE DWG T-232
N SOMERSET RANCH RD
I-105 WB
I-105/C LINE STATION
I-105 EB
S SOMERSET RANCH RD
ARTHUR AVE PEDESTRIAN CROSSING (TO BE RECONSTRUCTED)
PARAMOUNT
PEDESTRIAN WALKWAY (ACCESS FROM ARTHUR AVE)
BRIDGE ABUTMENT
EDGE OF DECK
OVERHEAD WALKWAY
LRT/PEDESTRIAN BRIDGE
℄ LT TRACK
SOUND WALL (8' MIN)
NEW FREIGHT BRIDGE
STATION PLATFORM (SEE NOTES 1 AND 2)
℄ RT TRACK
INTER-TRACK FENCE
RELOCATED ℄ FREIGHT TRACK
RETAINING WALL (SEE FREIGHT PLANS)
LIMITS?
LIMITS?
PLAN
SOUNDWALL SHOULD CLEAR NOISE SOURCE (WHEELS AND HORN)
L = 510
G1 = -0.35%
G2 = 3.00%
r = 0.66
V = 65 MPH
BF TX-210
AM TX-204
TOP OF RAIL RT TRACK
BRIDGE SOFFIT
OG
N. SOMERSET RANCH RD
I-105 WB
I-105 EB
S. SOMERSET RANCH RD
RETAINED FILL
I-105C LINE STATION
PROFILE
1085+00 1086+00 1087+00 1088+00 1089+00 1090+00 1091+00 1092+00 1093+00 1094+00
HORIZ: 1"=40'
VERT: 1"=10'
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY
Metro
wsp
WEST SANTA ANA BRANCH LRT
TRACK ALIGNMENT
ALTERNATIVES 1, 2, 3, AND 4
PLAN & PROFILE
STA 1084+50 TO STA 1094+50
CONTRACT NO AE5999300
DRAWING NO T-231
SCALE HOR: 1"=40' VERT: 1"=10'
SHEET NO 97 OF 154
B 10/8/2020 FINAL REVISED ACE SUBMITTAL
DATE 10/8/2020



REV	DATE	BY	APP	REG NO.	EXPIRES	SEAL HOLDER	DESCRIPTION
0	10/8/2020						FINAL REVISED ACE SUBMITTAL

DESIGNED BY CB
DRAWN BY RM
CHECKED BY RL
IN CHARGE NM
DATE 10/8/2020

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

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

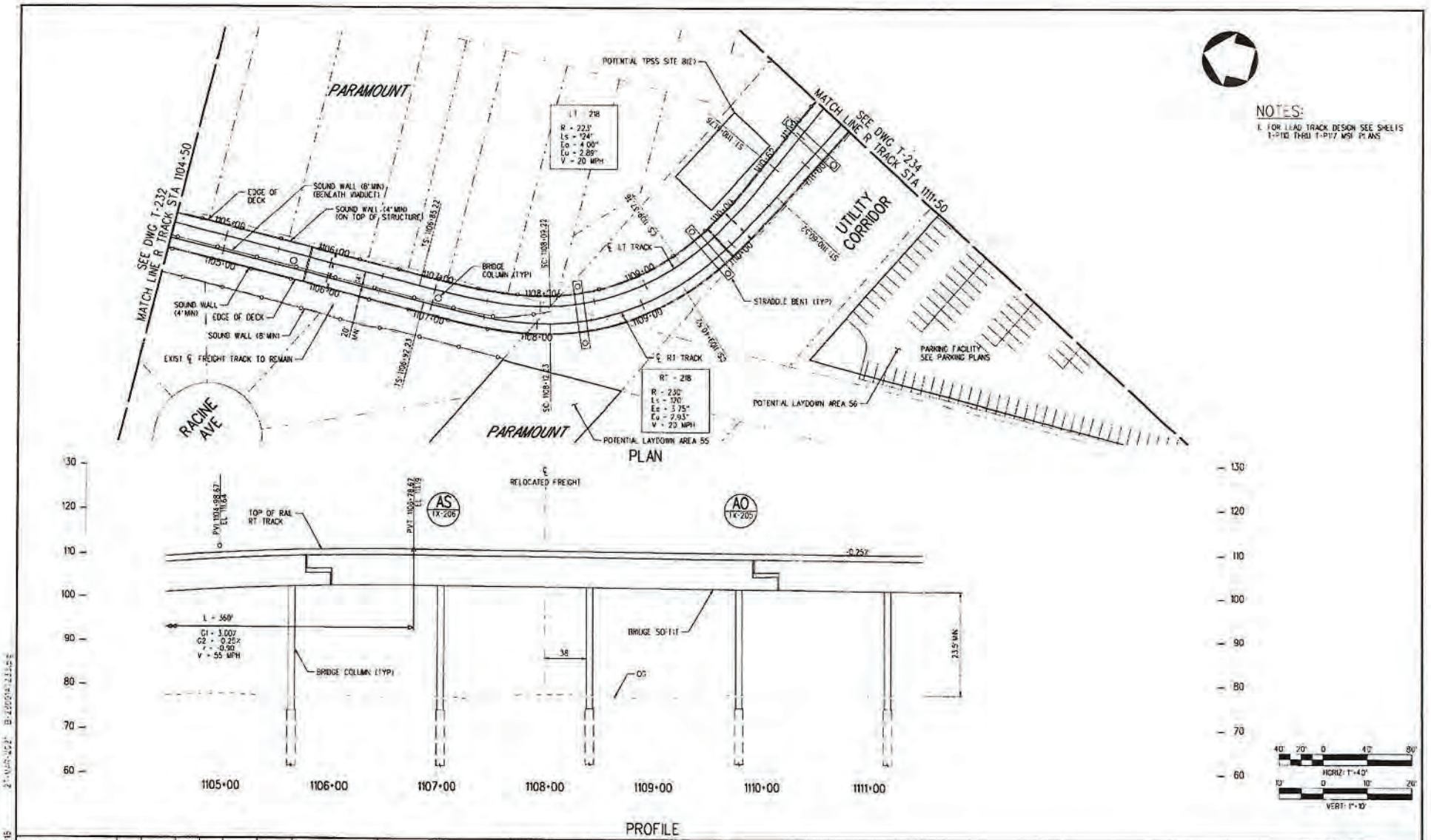
WSP 444 South Flower Street Suite 800 Los Angeles, CA 90071 TEL 1(213) 362-9470

SUBMITTED

APPROVED

WEST SANTA ANA BRANCH LRT TRACK ALIGNMENT ALTERNATIVES 1, 2, 3, AND 4 PLAN & PROFILE STA 1094+50 TO STA 1104+50

CONTRACT NO. AE5999300
DRAWING NO. T-232 REV.
SCALE HOR: 1"=40' VERT: 1"=10'
SHEET NO. 98 OF 154



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REV	DATE	BY	APP	REG NO.	EXPIRES	SEAL HOLDER	DESCRIPTION
0	10/8/2020						FINAL REVISED ACE SUBMITTAL

DESIGNED BY: CB
DRAWN BY: RM
CHECKED BY: RI
IN CHARGE: NM
DATE: 10/8/2020

Metro
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

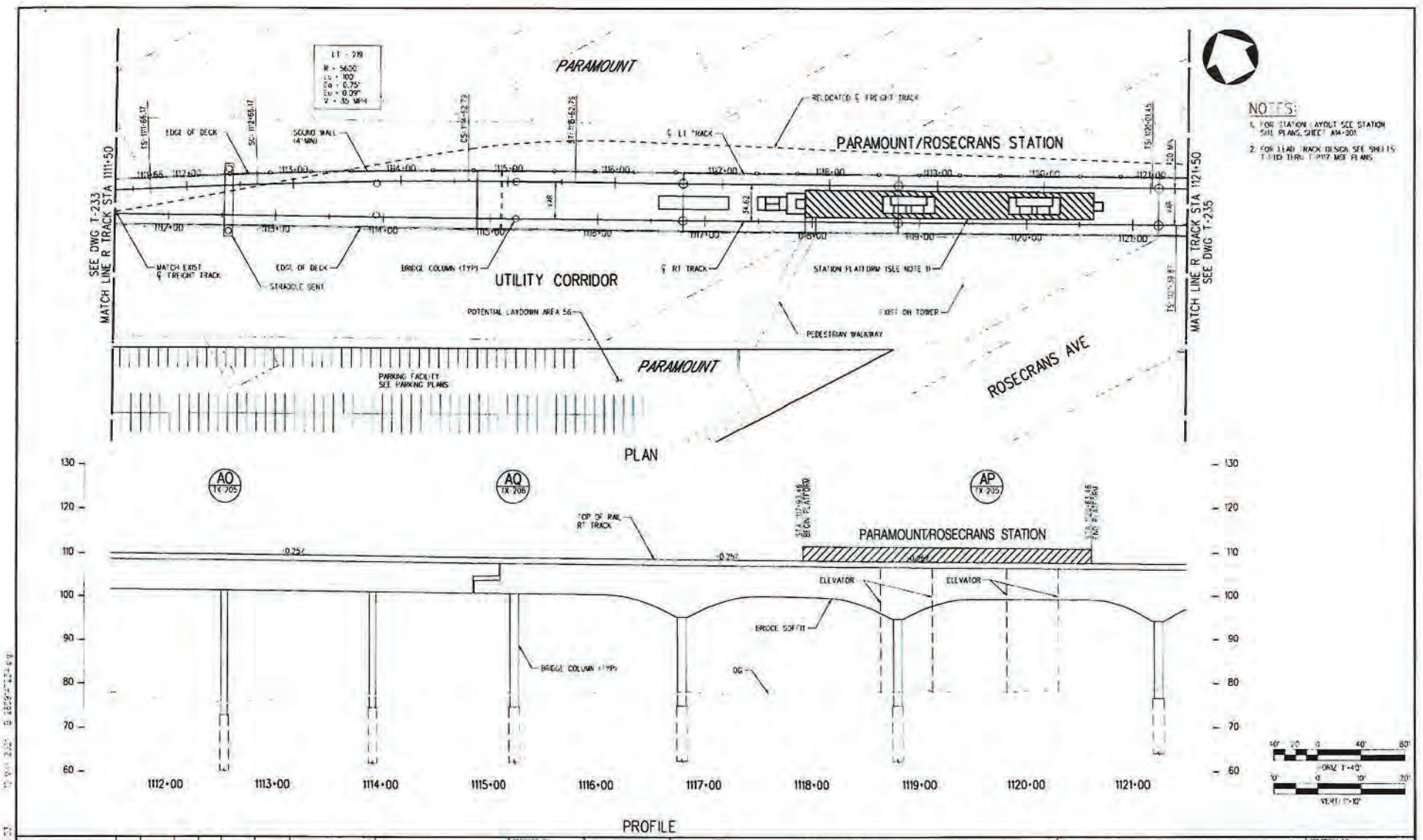
wsp
444 South Flower Street
Suite 800
Los Angeles, CA 90071
TEL: (213) 337-9870

SUBMITTED
APPROVED

WEST SANTA ANA BRANCH LRT
TRACK ALIGNMENT
ALTERNATIVES 1, 2, 3, AND 4
PLAN & PROFILE
STA 1104+50 TO STA 1111+50

CONTRACT NO: AE5999300
DRAWING NO: T-233
REV:
SCALE: HOR: 1"=40' VERT: 1"=10'
SHEET NO: 99 OF 154

HORIZ: 1"=40'
VERT: 1"=10'



NOTES:

1. FOR STATION LAYOUT SEE STATION SAIL PLANS, SHEET A14-001
2. FOR LEAD TRACK DESIGN SEE SHEETS T-110 THRU T-117 MSF PLANS

REV	DATE	BY	APP	IRS NO.	EXPIRES	SEAL HOLDER	DESCRIPTION
0	10/8/2020						FINAL REVISED ALT SUBMITTAL

DESIGNED BY: CR
DRAWN BY: PW
CHECKED BY: RS
IN CHARGE: NV
DATE: 10/8/2020

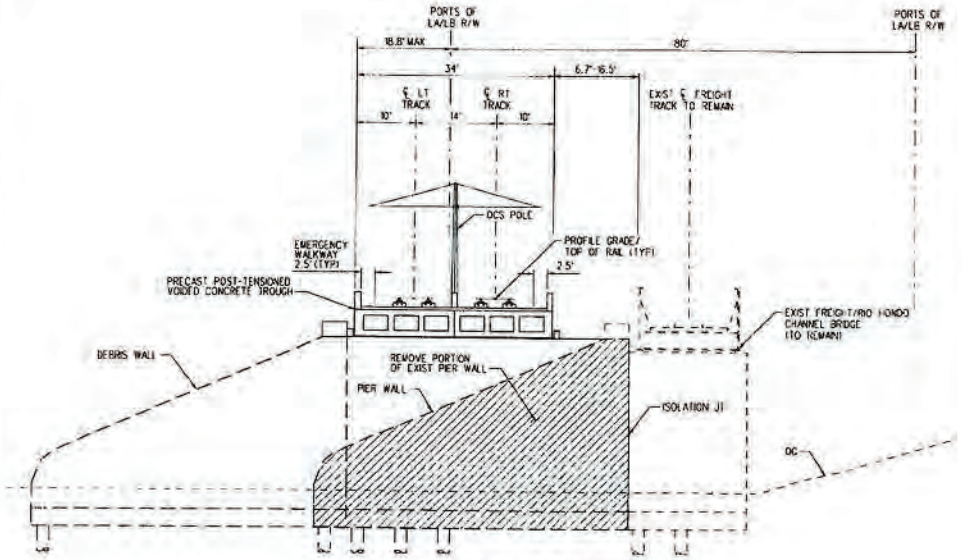
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

WEST SANTA ANA BRANCH LRT
TRACK ALIGNMENT
ALTERNATIVES 1, 2, 3, AND 4
PLAN & PROFILE
STA 1111+50 TO STA 1121+50

CONTRACT NO. AE5999300
DRAWING NO. T-234
SCALE: HORZ 1"=40' VERT 1"=10'
SHEET NO. 100 OF 154

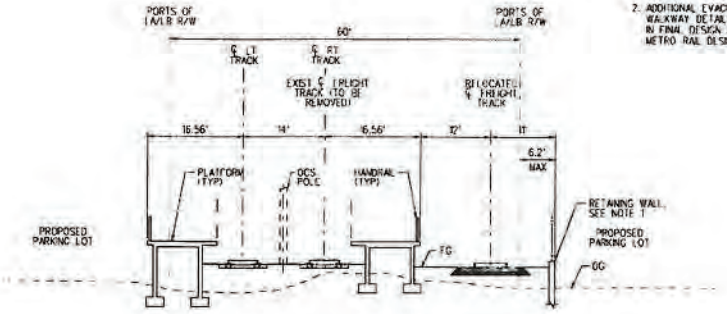
NOTES:

1. FOR FENCE, SOUND WALL AND RETAINING WALL LIMITS, SEE PLAN AND PROFILE SHEETS.
2. ADDITIONAL EVACUATION/EMERGENCY WALKWAY DETAILS TO BE PROVIDED IN FINAL DESIGN AND ADHERE TO METRO RAIL DESIGN CRITERIA (MRDC).



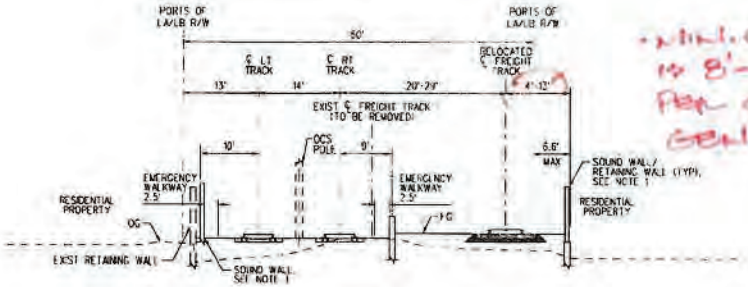
LRT GRADE SEPARATION AT RIO HONDO CHANNEL (AJ, T-221)

SCALE: NTS



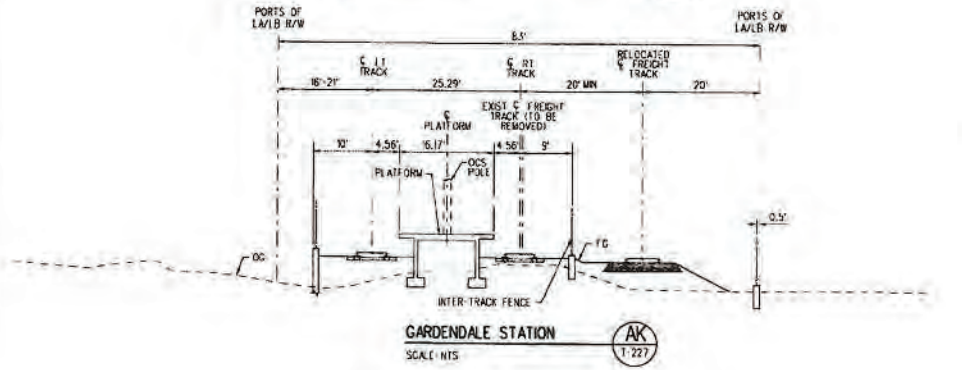
I-105/C LINE STATION (AL, T-230)

SCALE: NTS



AT-GRADE TYPICAL WITH REALIGNED FREIGHT BETWEEN I-105 AND PARAMOUNT STATION (AM, T-231, T-232)

SCALE: NTS



GARDENDALE STATION (AK, T-227)

SCALE: NTS

NOT FOR CONSTRUCTION

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0	10/8/2020						FINAL REVISED ACE SUBMITTAL

DESIGNED BY: JR
DRAWN BY: AI
CHECKED BY: RL
IN CHARGE: NM
DATE: 10/8/2020

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

Metro

WSP 444 South Flower Street Suite 900 Los Angeles, CA 90071 TEL (213) 362-9470

SUBMITTED

APPROVED

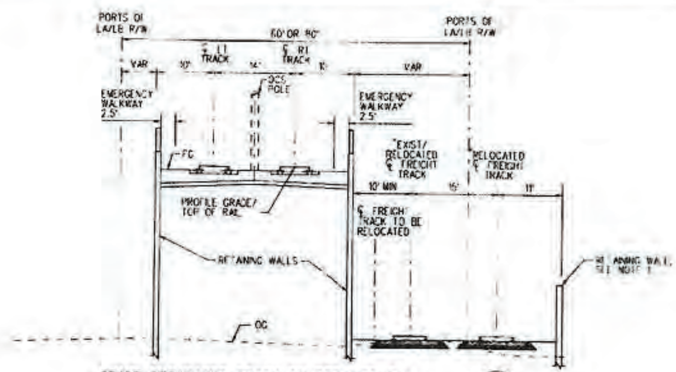
WEST SANTA ANA BRANCH LRT
TYPICAL SECTIONS
ALTERNATIVES 1, 2, 3, AND 4

CONTRACT NO. AE5999300
DRAWING NO. TX-204 REV
SCALE: NO SCALE
SHEET NO. 146 OF 154

CC-380

NOTES:

1. FOR SOUND WALL AND RETAINING WALL LIMITS, SEE PLAN AND PROFILE SHEETS.
2. ADDITIONAL EVACUATION/EMERGENCY WALKWAY DETAILS TO BE PROVIDED IN FINAL DESIGN AND ADHERE TO METRO RAIL DESIGN CRITERIA (MRDC).

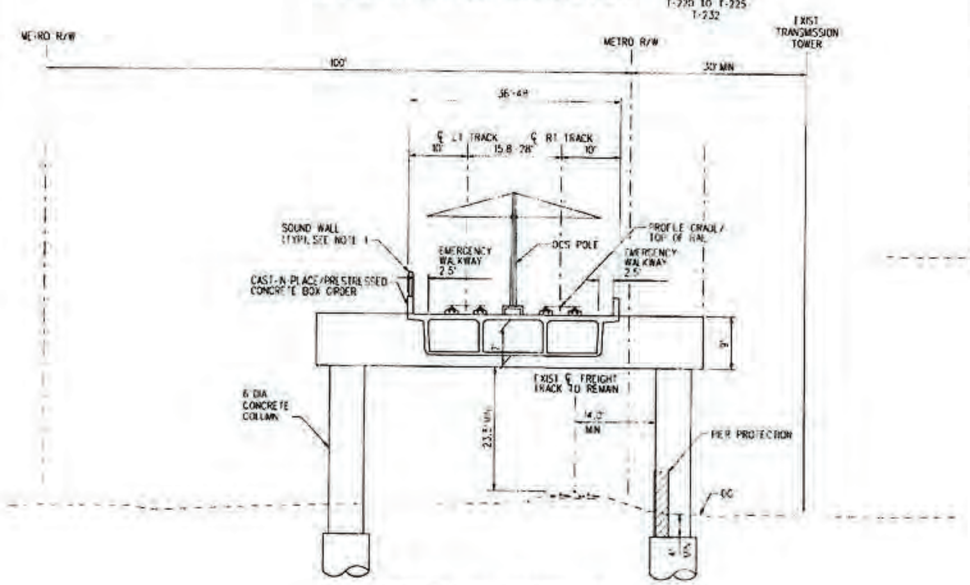


GRADE SEPARATED TRACK ON RETAINED FILL (AN / T-212)

SCALE: NTS

FOR STORAGE TRACK LOCATIONS, SEE PLAN AND PROFILE SHEETS.

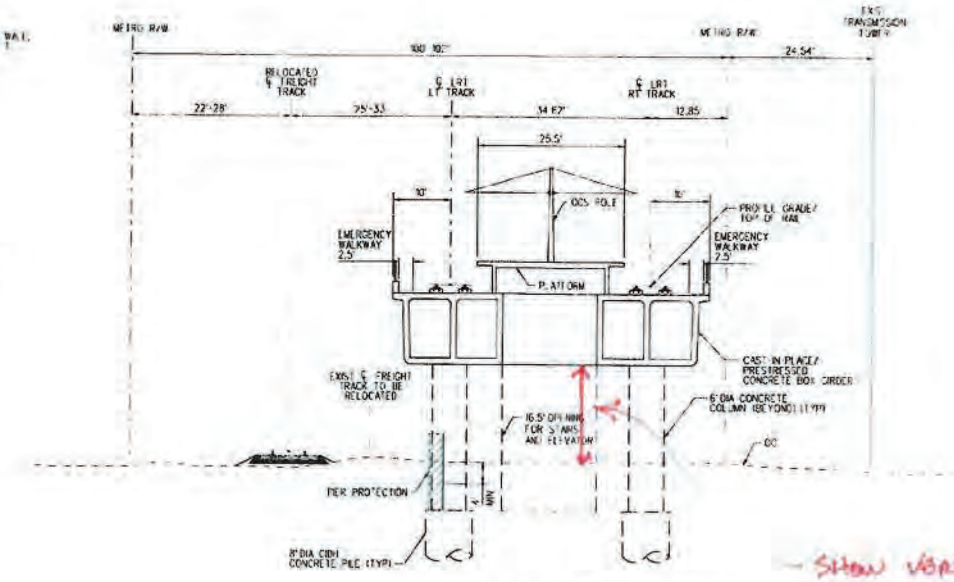
T-213 TO T-216
T-220 TO T-225
T-232



AERIAL STRUCTURE WITH OUTRIGGER BENT (AO / T-233)

SCALE: NTS

T-234



PARAMOUNT/ROSECRANS STATION (AP / T-234)

SCALE: NTS

— SHOW VERT. CLEARANCE

NOT FOR CONSTRUCTION

REV	DATE	BY	APP	REG NO.	EXPIRES	SEAL HOLDER	DESCRIPTION
0	10/8/2020						FINAL REVISED ACE SUBMITTAL

DESIGNED BY: JR
DRAWN BY: AT
CHECKED BY: RL
IN CHARGE: NM
DATE: 10/8/2020

Metro — LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

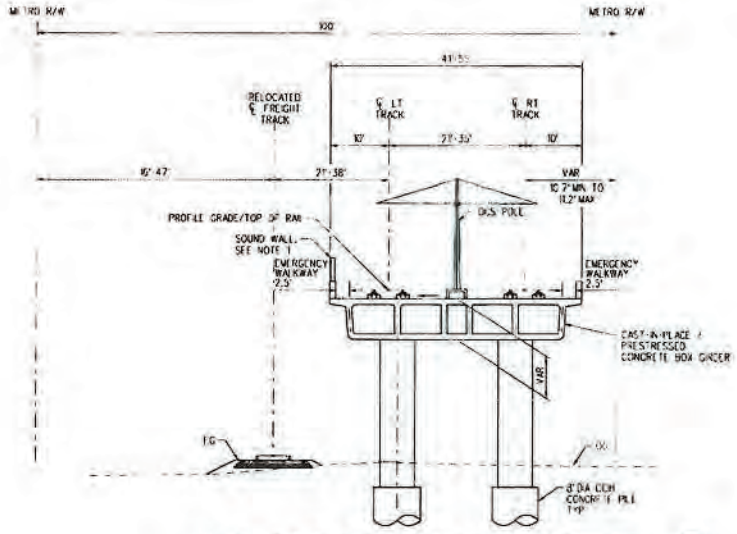
WSP — 444 South Flower Street, Suite 800, Los Angeles, CA 90071, Tel (213) 362-9472

SUBMITTED:
APPROVED:

WEST SANTA ANA BRANCH LRT
TYPICAL SECTIONS
ALTERNATIVES 1, 2, 3, AND 4

CONTRACT NO. AE5999300
DRAWING NO. TX-205
SCALE: NO SCALE
SHEET NO. 147 OF 154

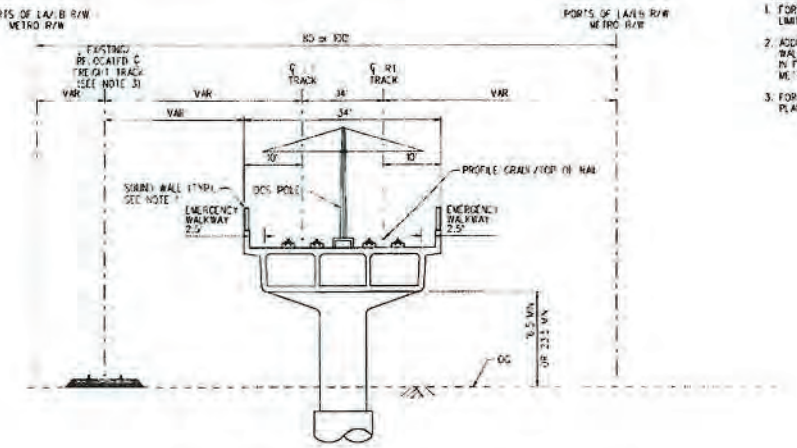
Plot Driver: MTA_mdf.pen   Pen table: bw.pl



TYPICAL AERIAL NEAR PARAMOUNT BLVD AND ROSECRANS AVE (AQ)

SCALE: NTS

T-234
T-235



TYPICAL AERIAL STRUCTURE (METRO ROW) (AS)

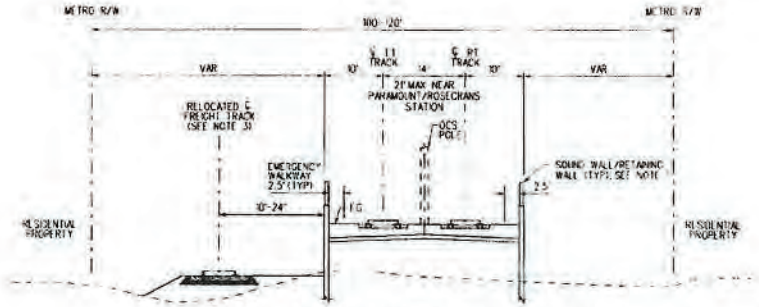
SCALE: NTS

T-232

SOUTH OF I-105
DOWNEY AVE*
FLOWER ST/WOODRUFF AVE
183RD ST/CRIDLEY RD

T-233, T-238, T-250
T-254 TO T-260

*DOWNEY AVE IS A SINGLE SPAN STRUCTURE

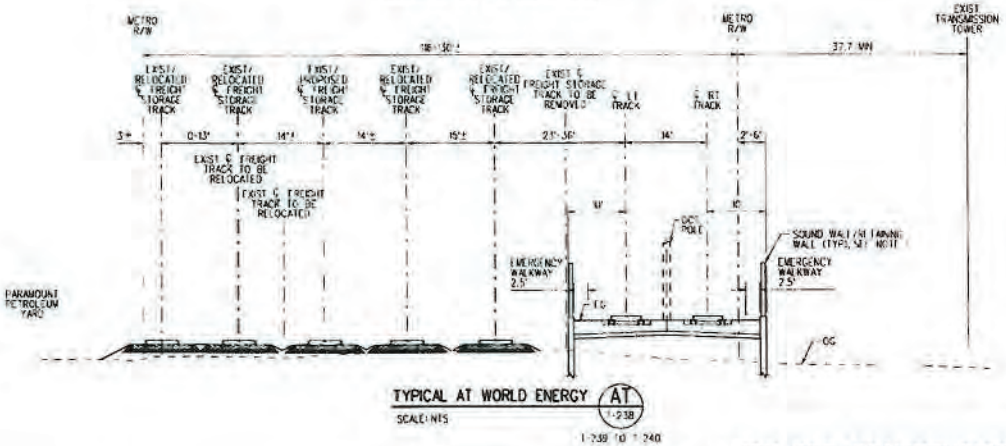


TYPICAL AT RETAINING WALLS WITHIN METRO R/W (AR)

SCALE: NTS

VARIOUS LOCATIONS

T-235 TO T-238
T-249
T-254 TO T-255
T-258 TO T-262
T-265



TYPICAL AT WORLD ENERGY (AT)

SCALE: NTS

T-238

T-239 TO T-240

NOT FOR CONSTRUCTION

REV	DATE	BY	APP	REG. NO.	EXPIRES	SEAL HOLDER	DESCRIPTION
0	10/8/2020						FINAL REVISED ACC SUBMITTAL

DESIGNED BY: BY
DRAWN BY: AT
CHECKED BY: RI
IN CHARGE: NM
DATE: 10/8/2020

THE PREPARATION OF THIS DRAWING HAS BEEN FINANCED IN PART THROUGH A GRANT FROM THE U.S. DEPARTMENT OF TRANSPORTATION FEDERAL TRANSIT ADMINISTRATION (FTA), UNDER THE FEDERAL PUBLIC TRANSPORTATION ACT OF 1964, AS AMENDED, AND IS SUBJECT TO THE TERMS OF THE CONTRACT BY AND BETWEEN THE LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY AND THE STATE OF CALIFORNIA

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

WSP

SUBMITTED

APPROVED

WEST SANTA ANA BRANCH LRT
TYPICAL SECTIONS
ALTERNATIVES 1, 2, 3, AND 4

CONTRACT NO. AE5999300
DRAWING NO. TX-206
REV
SCALE: NO SCALE
SHEET NO. 148 OF 154

CC-382

City of Paramount – CC-2

Comment ID	Response
CC-2-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-2-2	The drawing was revised, as the 4-foot dimension described the distance to the edge of the existing right-of-way. The minimum clearance between freight and light rail transit (LRT) tracks is 20 feet. Minimum clearances are shown in Appendix B of the Final EIS/EIR as approximately 10 feet to face of wall.
CC-2-3	The at-grade freight track will not cross under the station platform. Cross Section AO on Drawing TX-205 in the Final Advanced Conceptual Alignment Design Part 1 (Appendix B of the Draft EIS/EIR) shows the minimum vertical clearance where the freight track goes under the elevated LRT guideway (23.5 feet'). The freight track will cross under the guideway northeast of the proposed station platform.
CC-2-4	As shown in the Appendix B of the Draft EIS/EIR on Drawing Nos. TX-204 and TX-205, fencing is provided along the at-grade portions of the alignment to create a physical barrier and prevent access. The majority of the segment between Century Boulevard and Rosecrans Avenue will have fencing or soundwalls on both sides of the right-of-way, limiting access to the corridor.
CC-2-5	In this location, both a retaining wall and soundwall are identified. The soundwall will be located on top of the retaining wall. Soundwalls are located throughout the entire length of this section.
CC-2-6	There will be no change to freight train operation as a result of the WSAB Project. Freight trains will not be elevated and will maintain their existing grade. Analysis was conducted for relocated freight tracks between approximate Stations 1089+50 to 1121+00. Proposed soundwall locations are shown in Figures 4.7-5 through 4.7-11 in the Draft EIS/EIR and depicted in more detail on the design plans included in Appendix B of the Draft EIS/EIR and in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (Appendix M of the Draft EIS/EIR). Soundwalls to address freight noise were included as mitigation in the Draft EIS/EIR. The measure was referred to as Mitigation Measure NOI-7 Freight Track Relocation Soundwalls in the Draft EIS/EIR and summarized in Section 4.7.4 of the Draft EIS/EIR. The measure is now referred to as Mitigation Measure NOI-5 in the Final EIS/EIR and described in Section 4.7.4.2 of the Final EIS/EIR. Soundwalls for freight track relocation are proposed for the approximate stations of 1089+50 to 1108+00 on both sides of the right-of-way. An additional freight wall is proposed along the north side of the right-of-way between 1108+00 to 1121+00. The section of elevated guideway that is on retained fill will also act as a sound barrier when it is between the freight tracks and the neighborhood. Proposed freight soundwalls range in heights from 12 feet to 16 feet to mitigate freight noise (pass-by and horn noise) as a result of relocated freight tracks. The soundwalls on the retained fill and viaduct range in heights from 6 feet to 8 feet. The required wall heights were calculated accounting for receiver height and elevation relative to the height of the freight diesel engines and horn.
CC-2-7	The LRT tracks for the Project and any relocated freight tracks will be continuous welded rail. Where noise impacts from LRT passby were identified at sensitive receptors, Mitigation Measure NOI-1 (Soundwalls) requires soundwalls at the edge of track or the right-of-way for at-grade segments of the Project and along the viaduct where the alignment is aerial, as feasible. Mitigation Measure NOI-1 has been updated since the Draft EIS/EIR to reflect updates in the noise analysis and project design. See response to comment CC-2-6 for further information regarding soundwalls.

Comment ID	Response
CC-2-8	As described in Chapter 4, Section 4.7.4.2 of the Draft EIS/EIR, Mitigation Measure VIB-1 (Ballast Mat or Resilient Rail Fasteners) includes the use of ballast mats for ballast and tie track and resilient rail fasteners for direct fixation track or other comparable vibration isolation techniques for specified locations with vibration impacts. The table included with Mitigation Measure VIB-1 in the Draft EIS/EIR identifies ballast mat from Nevada Avenue to Paramount High School. Ballast mat locations have been refined in the Final EIS/EIR, but are still proposed between Station 1089+00 to 1105+00, near the residential units. Mitigation Measure VIB-1 and ballast mat locations are described in Chapter 4, Section 4.7.4.2 of the Final EIS/EIR. The potential for vibration impacts has more to do with the existing/relocated freight tracks than the future light rail tracks; therefore, resilient fasteners would not be appropriate in this area. The locations of ballast mat will be confirmed in final design, but ballast mat is planned for the area where freight tracks are relocated.
CC-2-9	Freight track alignment plans were included in Appendix B – Part 2 of the Draft EIS/EIR. Design plans for the lead tracks were prepared for the Paramount MSF site option and included in Appendix B – Part 1 of the Draft EIS/EIR. Refer to response CR-GEN-2 regarding identification of the Bellflower MSF as a component of the LPA.

CC-5

City of South Gate (Chris Jeffers)

CC-5-1

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P: (323) 563-9503 F: (323) 569-2678
www.cityofsouthgate.org

City of South Gate

Chris Jeffers, Interim City Manager

September 28, 2021

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

Re: Comments West Santa Ana Branch Transit Corridor Draft Environmental/Environmental Impact Report

Dear Ms. Khanna,

The purpose of this letter is to respond to our review of the Draft Environmental Impact Statement/Environmental Impact Report (EIR) that was prepared for the West Santa Ana Branch (WSAB) Transit Corridor Project (Draft EIS/EIR). The City of South Gate is strongly in support for the development of Alternative 1 (Los Angeles Union Station to the Pioneer Station). Our elected leaders were strong supporters of Measures R and M transportation sales tax measures that are being used by Metro to fund the local portion of the WSAB light rail project.

CC-5-2

We also look forward to working together with the Los Angeles County Metropolitan Transportation Authority (Metro) and our elected representatives so that we can continue to obtain funding to build this line in an equitable and sustainable manner. As much as we support the project, South Gate does not have the financial means to provide MTAs requested 3% local match. We ask that Metro work with the cities on identifying non city general funds that can recognized as that match. We have arranged our comments to correspond to the sections included in the Draft EIS/EIR.

CC-5-3

Section 1.2.2. Need for the Project

The Draft EIS/EIR indicates that Hawaiian Gardens and Long Beach are included in the study area. We recommend that Figure 1-1, as well as the other related exhibits throughout the document, be corrected to better illustrate the boundaries of the cities and unincorporated areas that comprise the study area.

CC-5-4

Section 1.3.1 Study Area Population and Employment

The Draft EIS/EIR cites the high population density of certain cities in the project area. South Gate's importance in the Gateway area as a commercial and employment center is not called out. The City's employment base is very specialized, well established, and includes specialized

CC-5-5

manufacturing, and other labor-intensive land uses. The daytime population density of South Gate could well exceed those of the other cities noted in the Draft EIS/EIR though the City isn't noted at all in Figure 4-1 even though three stations will be located within or near the City. This information should be considered in the Draft EIS/EIR. CC-5-5

Section 1.4 Regional Transportation System

We are concerned that the Draft EIS/EIR (refer to Table 1-3) failed to mention that Firestone Boulevard is a major east-west arterial in the region. What criteria was used to identify those arterial roadways summarized in Table 1-3? The rationale for selecting these arterial roadways should be indicated in the Draft EIS/EIR. The potential for disruption of this roadway during both construction and operation is considerable. The format of the EIS/EIR is confusing in that the transportation and traffic related issues are included under the discussion of the project rather than as a separate environmental issue. CC-5-6

"Table 3.4 Major Roadway Facilities Serving the Study Area" for South Gate, shall also include Firestone Boulevard, Atlantic Avenue, Garfield Avenue, and Imperial Highway, as these major roadways are serving the study area, and are in close proximity to the alignment and light rail stations. "Table 3.5 Key Intersections" shall also include Firestone Boulevard at Garfield Avenue, Gardendale Street at Garfield Avenue, Main Street at Garfield Avenue, Main Street at Paramount Boulevard, Century Boulevard at Garfield Avenue, Gardendale Street at Paramount Boulevard, and Southern Avenue at Rayo Avenue because these intersections will be impacted by the project due to their proximity to light rail stations.

Section 2.5.2.2 Description of South Gate Alignment

The Draft EIS/EIR describes that portion of the alignment alternatives that extend through the City of South Gate, as follows:

> "From the at-grade Florence/Salt Lake Station in the City of Huntington Park, the alignment would continue southeast at-grade within the San Pedro Subdivision ROW, crossing Otis Avenue, Santa Ana Street, and Ardine Street. The alignment would be located on the eastside of the existing San Pedro Subdivision ROW freight tracks, and the existing freight tracks would be relocated to the west side of the ROW, with a minimum 20-foot clearance from the freight tracks. South of Ardine Street, the alignment would transition to an aerial structure to cross over the existing UPRR tracks and Atlantic Avenue to the aerial Firestone Station located on an aerial structure between Atlantic Avenue and Firestone Boulevard in the City of South Gate, as illustrated in Figure 2-7. Alignment Profile from Florence/Salt Lake Station to I-105/C Line Station the aerial Firestone Station, the aerial alignment would transition to an at-grade configuration prior to crossing Rayo Avenue at-grade. CC-5-7
>
> The alignment would continue south along the San Pedro Subdivision ROW, crossing at-grade and continuing at-grade until transitioning to an aerial configuration to cross over the LA River. A new LRT bridge would be constructed east of the existing LA River truss bridge to cross the LA River, and the truss bridge would remain unaltered.

South of the LA River, the alignment would transition to an at-grade configuration crossing Frontage Road, transecting the I-710 freeway through a new box tunnel structure and then crossing Miller Way. The alignment would then transition to an aerial structure to cross the Rio Hondo Channel. A new LRT bridge would be constructed east of the existing freight bridge that would remain unaltered. South of the Rio Hondo Channel, the alignment would briefly transition to an at-grade configuration before returning to an aerial structure to cross over Imperial Highway and Garfield Avenue. South of Garfield Avenue, the alignment would transition from aerial to an at-grade configuration and continue to the Gardendale Station at the border of the Cities of Downey and South Gate from the Gardendale Station, the alignment would continue south at-grade within the San Pedro Subdivision ROW, crossing Gardendale Street and Main Street to the at-grade I-105/C Line Station located north of Century Boulevard in the City of South Gate."

CC-5-7

The exhibits, including Figure 2-7, are difficult for the average layperson to understand. We appreciate that an effort was made to place to LRT tracks above both Atlantic Avenue and Firestone Boulevard. However, the attendant impacts of these aerial segments must be clearly articulated to our residents. The aerial portion of the LRT alignment will extend through the northern portion of the City and will have the potential for significant aesthetic and noise impacts. We are concerned that the EIS/EIR does not clearly convey the extent of the aerial portion of the alignment through the City.

Section 2. Project Alternatives, Firestone Station

The aerial Firestone Station would be located on an elevated structure within the existing San Pedro Subdivision ROW between Atlantic Avenue and Firestone Boulevard. Access to the station would be from the proposed park-and-ride lot and via a new pedestrian walkway from Atlantic Avenue to a pedestrian crossing across the at-grade freight tracks. A 9.1-acre parking facility with up to 600 parking spaces is proposed at this station. Access to the parking facility would be via two driveways from Atlantic Avenue; the southernmost driveway would be accessed from Atlantic Avenue and would pass under the Firestone Station to the parking facility. Pedestrian access between the station platforms and the parking facility would be via a new pedestrian walkway extending from Atlantic Avenue to a pedestrian crossing across the at-grade freight tracks, north of the Firestone Station platform. The platform would be accessed via two elevators, two sets of stairs, and escalators. These aforementioned station elements are very difficult to understand even with the exhibit that is provided in the Draft EIS/EIR.

CC-5-8

A safe, and dedicated bike access to the Firestone Station is warranted as Firestone Boulevard and Atlantic Avenue are heavily congested particularly during peak hour traffic conditions, making the LA River bike trail a safe alternative. Metro shall identify and fund the installation of a dedicated bikeway from the Los Angeles River to the Firestone Station, potentially to be located on Patata Street, to provide for enhanced bike access and to mitigate the potential impact to bike safety resulting from the project. Metro shall provide a bike hub at the Firestone Station with appropriate amenities, to encourage bike access.

CC-5-9

Section 2. Project Alternatives, 105/C Freeway Station

Figure 2-16 included in the Draft EIS/EIR illustrates the I-105C station layout, though it is also very difficult to read and understand. We are concerned that our residents may not fully

CC-5-10

comprehend all the key elements of the station's construction and operation. These elements would include the following:

1. The I-105/C Line Station would provide a connection with the Metro C (Green) Line via a new station platform in the Metro C (Green) Line alignment within the I-105 freeway median. The I-105/C Line Station would be located at-grade within the rail ROW, north of Century Boulevard within the City of South Gate. This station would consist of two side platforms with access at the north and south ends of the station platform.

2. A pedestrian crossing would be located at the northern end of the station platforms with access to the two proposed parking facilities. Access from the southern end of the platform would be provided via a pedestrian walkway to Century Boulevard. To accommodate the station platforms, the existing freight track would be relocated to the west, which would require the demolition of the existing freight bridge and construction of a new freight bridge. We are concerned about night-time construction noise and any attendant mitigation. We are also concerned about pedestrian security between the platforms and parking areas.

3. The new station would be located along the existing Metro C (Green) Line within the median of the I-105 freeway. The Metro C (Green) Line would be realigned to provide space for the new center platform. This station would be accessed via stairs and/or escalators and elevators from a pedestrian walkway incorporated into the new LRT bridge on the east end and via stairs and elevators from Façade Avenue on the west end of Century Boulevard.

CC-5-10

4. On the south side of the freeway, the pedestrian bridge would connect to a pedestrian walkway between the San Pedro Subdivision ROW and Arthur Avenue to the east. The existing Façade Avenue overpass bridge and the Arthur Avenue pedestrian bridge would also be reconstructed as two-span structures to accommodate both the WSAB and Metro I-105 Express Lanes projects. Security has been an issue for many of the freeway pedestrian bridges elsewhere in Southern California.

CC-5-11

5. Two parking facility sites, totaling approximately 3.7-acres and accommodating up to 326 parking spaces, would be located on the west and east sides of the I-105/C Line Station platforms along the project alignment north of Century Boulevard. The western parking facility is approximately 1.2 acres with vehicle access via Century Boulevard and Center Street. The eastern parking facility is approximately 2.5 acres with vehicle access via two driveways from Industrial Avenue. Pedestrian pathways between the parking facilities and the station platform would be provided from Century Boulevard and from the north end of the platform to the eastern parking facility. We are concerned about the potential displacement impacts associated with the construction of the two parking areas as well as spill over parking. Traffic and parking impacts at this station, as currently planned, would have significant impacts on the local neighborhood.

CC-5-12

Potential Impacts of the Gardendale Station on South Gate

The City is very concerned about the lack of parking at the proposed Gardendale Station and how this facility may impact vehicular and pedestrian safety along Gardendale Street. According to the Draft EIS/EIR, the travel demand model did not include any parking supply analysis and therefore, parking demand was not projected for those stations that did not provide parking. As a result, we have no way of knowing the degree of spillover parking that may occur. The EIS/EIR simply stated that "For these stations [those stations without parking facilities], it is assumed that no transit parking would materialize during operation of the Project as there would not be a dedicated parking supply." This statement makes no sense and is contradicted throughout the environmental report. With the number of daily boardings at the Gardendale Station estimated to range between 1,000 to 1,400, how can this statement be assumed to be true? CC-5-13

The Draft EIS/EIR states in numerous places (for example, Page 3-83) that "on-street parking supply is more available around the Pacific/Randolph, Florence/Salt Lake, and Gardendale Stations…therefore, if transit passengers access these stations via car, on-street parking capacity would likely be available to accommodate drivers without displacing others using the spaces. Therefore, spillover parking *impacts would not occur at these stations."* This statement is simply not true as it applies to the Gardendale Station. As we have already indicated elsewhere in this letter, the Draft EIS/EIR failed to identify both the true potential parking availability and the potential parking demand impacts.

Section 3.3.6 must be revised to identify the bike lanes on Gardendale Avenue as a Major Class II Bikeways as they span from the City of Downey to the LA River and connect to the Gardendale Station. CC-5-14

Section 2.5.6 Construction Activities

The Draft EIS/EIR indicates that simultaneous construction may be effective in reducing the overall construction duration. Working hours of construction would vary to meet the type of work being performed and to meet local ordinance restrictions. Nighttime and weekend construction may be required to mitigate potential impacts to the commute period and traffic congestion, and to accommodate construction scheduling for specific work activities. Such nighttime and weekend construction activities may include, but are not limited to, construction within freeway ROW, tunneling operations, trackwork construction, grade separation construction, catenary wire installation, and construction of other cut-and-cover sections. Construction activities are anticipated to occur over the course of approximately six years, commencing in 2022 and ending in 2028. We are requesting the EIS/EIR indicate the timing and during of construction for those project elements located in the City of South Gate. The EIS/EIR needs to indicate the mitigation measures that will be effective in ensuring that the impacts to Atlantic Avenue and Firestone Boulevard can be minimized as much as possible. We are also concerned about more specific measures related to traffic safety, road closures, dust control and clean up, etc. CC-5-15

Section 3.2.4.1 On and Off-Street Parking Analysis

The Draft EIS/EIR outlines how the proposed project's impacts on off-street parking on private properties were assessed so as to determine whether the loss of these parking spaces would result in an adverse impact. If supply would fall below requirements, an adverse effect would occur. Metro would enter into an agreement with the applicable jurisdiction for the loss of off-street CC-5-16

parking spaces associated with governmental institutions (e.g., city offices). In these instances, it is assumed that an agreement would be reached, and no adverse effects would occur. The off-street parking analysis also considered whether excess parking demand at each station would result in increases in traffic circulation, traffic delay, and a corresponding increase in emissions as drivers seek to find available on-street parking. A detailed parking and traffic analysis for the individual stations that will be located in South Gate is requested by the City.

CC-5-16

The City is impacted with on-street parking issues, as documented in the City's Citywide Parking Study. Parking issues exists in and around the Firestone Station, the Gardendale Station and the I-105/C Line Station. Since there is limited on-street parking available on the surrounding streets, parking impacts could have an adverse effect on local businesses and residents. Metro shall install sufficient on-site parking to accommodate the parking demand estimated from 2017 to 2042 at each station, to mitigate the potential impact to on-street parking, local businesses and residential communities.

Section 3.2.4.2 Spillover Parking Analysis

The Draft EIS/EIR indicated that for those stations without dedicated transit parking, the travel demand model did not include any parking supply and therefore, parking demand was not projected. For these stations, it is assumed that no transit parking would materialize during operation of the Project as there would not be a dedicated parking supply. However, an analysis of available on-street parking was conducted around these stations to determine if some parking demand could be accommodated if passengers do attempt to drive to these stations. While this does not apply to the Firestone station, there was an assumption that on-street parking would be available to make up for any short fall at the Firestone and Gardendale stations where there is a parking deficit, or no parking would be provided. The City of South Gate is very concerned about the potential for spill over parking around the three stations within its planning area. Furthermore, we did not find any detailed parking analysis that was referred to in the Draft EIS/EIR. The City completed a city-wide parking study that can be made available to the preparers of the Final EIS/EIR.

CC-5-17

Metro is proposing 600 and 326 parking spaces on the Firestone Station and I-105/C Line Station, respectively, yet it estimates a ridership of 3,834 and 4,477, respectively. This is concerning as the I-105/C Line Station is within a residential neighborhood, has a higher ridership estimated, yet has less parking spaces proposed. Metro shall increase the proposed number of parking spaces at the I-105/C Line Station, to at least 600 spaces to accommodate parking demand.

Metro shall update "Section 3.2.4.1 On-and Off-street Parking Analysis," "Section 3.4.2 Spillover Parking Analysis," and Table 3.8 to supplant the results of the visual survey and Metro's understanding of the unutilized supply of on-street parking, with the results of the Citywide Parking Study, to ascertain the availability of on-street parking. It appears that sufficient on-street parking capacity is not available to accommodate station parking demand. Metro shall accommodate all parking needs within the proposed parking lots. Metro shall also identify mitigation measures for any spillover parking anticipated from the project.

Section 3.4.4.2 Table 3.33 On-Street Parking

The parking analysis at Firestone Station, Gardendale Station and Main Street Grade Crossing claims that the parking occupancy numbers were gathered during observations made during peak parking periods. According to information in the Appendix, the parking analysis in the corridor was conducted at various times Tuesday through Friday in September 2017, therefore claim that the parking occupancy information was gathered during peak parking periods is false and is not acceptable for any parking study. The parking study should include morning, mid-day, afternoon, and evening parking counts. It should be conducted on a weekday (Tuesday, Wednesday, or Thursday) and weekend (Saturday or Sunday). It should account for specific local conditions. It should include public and private parking in the station area (current and future, FY 2042). CC-5-18

Section 3. Major Roadway Facilities Analyzed in EIS/EIR

We are very surprised that Atlantic Avenue, Firestone Boulevard, Imperials Highway and Garfield Avenue were not included on the list while Long Beach Boulevard is identified. What criteria was used as the basis in selecting these roadways and travel corridors for study? While the LRT alignment may have an aerial configuration at these locations, construction activities will have an impact on their operation. CC-5-19

Section 3. Transportation, Boardings at the Firestone Station

According to the Draft EIR/EIR, the implementation of Alternative 1 would result in 49,941 daily boardings at the Firestone station, Alternative 2 would result in 5,473 daily boardings, and Alternative 3 would result in 3,834 daily boardings. The parking supply for the Firestone station would be 600 spaces while the parking demand will be 960 spaces, resulting in a deficiency of 360 spaces according to the Draft EIS/EIR. The parking supply for the I-105C station will be 326 spaces. The parking demand for the I-105C station will be 450 spaces station will be 530 parking spaces. The Draft EIS/EIR indicated that the excess parking demand (it should have indicated this as a *deficiency*) was 124 spaces for the I-105 station and 360 spaces for the Firestone station. Station parking would meet the anticipated demand for Alternatives 3 and 4. The City remains very concerned regarding the potential for the spillover parking impacts CC-5-20

Section 4. Affected Environment and Environmental Consequences. Land Use Consistency

The Draft EIS/EIR indicates the proposed parking facility at the I-105/C Line Station in South Gate "would further improve access to the regional transportation system as residents in the surrounding area would have access to both the proposed transit line and the Metro C (Green) Line. At this station, the Project would construct a new Metro C (Green) Line Station platform within the median of the I-105 freeway. While some of the proposed parking facilities are located adjacent to residential neighborhoods, none of the proposed facilities would impede access and mobility of motorists, pedestrians, and bicyclists to residential neighborhoods and community assets. CC-5-21

Rather, regional and local access to and from these communities would increase." The Draft EIS/EIR lacks sufficient detail regarding potential displacement impacts to private property at either station to accommodate the proposed parking areas. The traffic impacts associated with this station's operation would significantly impact the local neighborhood. We are also worried about the security of the passengers using the stairs and/or escalators at this station. CC-5-22 CC-5-23

Traffic and Transportation Impact Analysis

Traffic congestion and access to the I-105/C Line Station is a potential impact based on Metro's estimated ridership. Motorists will likely access the Station through the various adjacent residential streets. Metro shall work with the City to develop an Active Transportation Plan (ATP) and fund its construction as a part of the project. The ATP Plan shall include traffic and safety mitigations, bikeway improvements, and designated routes for access to the Station. At a minimum, the plan shall include the following:

- The traffic signal systems located at the intersections of (a) Main Street and Garfield Avenue, and (b) Garfield Avenue and Century Boulevard, shall be modified to add left-turn phasing, to provide for safe access to the I-105/C Line Station. These signalized intersections will likely be utilized by motorists to access the I-105/C Line Station or the Gardendale Station, thus left-turn movements will increase thereby creating a need to mitigate potential safety issues.

- On Paramount Boulevard, between Gardendale Street and Somerset Ranch Road, prohibit turning movements westbound onto the adjacent residential streets during peak hour traffic, except for Main Street, to mitigate potential impacts of cut-through traffic through the residential streets of motorists wishing to access the I-105/C Line Station.

CC-5-24

- On Garfield Avenue, between Gardendale Street and Century Boulevard, prohibit turning movements eastbound onto the adjacent residential streets during peak hour traffic, except for Main Street, to mitigate potential impacts of cut-through traffic through the residential streets, of motorists wishing to access the I-105/C Line Station.

- On Gardendale, between Garfield Avenue and Paramount Boulevard, prohibit turning movements southbound onto the adjacent residential streets during peak hour traffic, except for Center Street and Industrial Street, to mitigate potential impacts of cut-through traffic through the residential streets, of motorists wishing to access the I-105/C Line Station.

- On Century Boulevard, between Garfield Avenue and Center Street, prohibit turning movements northbound onto the adjacent residential streets during peak hour traffic, to mitigate potential impacts of cut-through traffic through the residential streets, of motorists wishing to access the I-105/C Line Station.

- Provide a traffic control plan to require motorists leaving the I-105/C Line Station to utilize Century Boulevard and Garfield Avenue, to mitigate the potential impact to residential streets.

Other Traffic Related Issues

CC-5-25

- Industrial Avenue and Center Street will likely be utilized by motorists to access the I-105/C Line Station. Repave both streets from Gardendale Street to Century

Boulevard to mitigate pavement impacts. Further, redesign both streets with traffic calming measures and bikeway improvements, to promote safe access. CC-5-25

- Fund and implement an on-street residential permit parking program in and around the I-105/C Line Station, to mitigate the potential on-street parking impacts. CC-5-26

- Reconstruct Century Boulevard to provide for a complete street design with dedicated bike lanes, traffic calming measures, from the Los Angeles River Bike Trail to the I-105/C Line Station, to encourage bike access to the station. CC-5-27

- Provide for an enhanced bus transit program to provide public access to the Firestone Boulevard station, and I-105/C Line Station. The proposed hours of operation for the WSAB are from 4:00 a.m. to 2:00 a.m. At a minimum, service shall be provided during these hours of operation. Driveway approaches for the I-105 station should accommodate bus transit. CC-5-28

- Clarify how local bus transit services and drop-off areas will be incorporated to station parking lots. Incorporate special designated areas for local transit. Provide a Kiss and Ride designated area for the Gardendale Station.

- Access to the Firestone Boulevard parking facility would be via two driveways on Atlantic Avenue. Analyze the impact of the southerly driveway to the main entrance to the Azalea Shopping Center since the proposed driveway aligns at the main entrance. CC-5-29

- Provide access from Firestone Boulevard to the proposed Firestone Boulevard parking lot that can accommodate bus transit and passenger vehicles. Driveways shall be limited to right-turn in right-turn out only.

- Southbound access from Atlantic Avenue to the northerly driveway entrance of the Firestone Boulevard parking lot is anticipated to queue to Patata Street which is approximately 100 feet away. Assess and mitigate potential impacts.

- Mitigate potential traffic impacts on Atlantic Avenue and Firestone Boulevard, provide access to the Firestone Boulevard parking lot from Patata Street at Wilcox Avenue. CC-5-30
- Upgrade the intersection of Atlantic Avenue and Patata Street, by adding left-turn and right-turn westbound lanes with longer turn bays. This might require right-of-way acquisition.

Analysis of Future (Cumulative Projects) in South Gate

- Draft EIS/EIR should take into consideration the potential development proposed at 4959 Patata Street and 5037 Patata Street. CC-5-31

- Identify the potential impacts and mitigations to the traffic signal coordination system that is currently connecting the intersection of Atlantic Avenue and Patata Street, Atlantic Avenue and the Azalea Shopping Center/Southerly driveway of Firestone Boulevard parking lot, Firestone Boulevard and Atlantic Avenue and Firestone Boulevard at Mason Street/Firestone Place. These intersections are operated by a pre-emption system and are operating as one coordinated system. CC-5-32

- Stations shall include amenities such as bike racks, pedestrian lighting, benches, lockers, wayfinding signage, bike hubs, etc. to encourage bike access. CC-5-33

- The mitigation measure for the intersection of Gardendale Street at Center Street calls for a traffic signal system. The mitigation for the intersection of Gardendale Street and Dakota Avenue is to have a pedestrian signal. Consider installing one signal system that operates both intersections since they are less than 300 feet apart. CC-5-34

- Provide a pre-signal installation at the Rayo Avenue at-grade railroad crossing to mitigate the potential impact of increased train traffic.

- The proposed parking lots for the I-105/C Line Station require property acquisition. Metro shall acquire the property without the use of eminent domain.

- The existing properties west of the railroad tracks near Atlantic Avenue and Mason Street, are currently designated as a partial acquisition for temporary construction easements. However, these acquisitions will likely require a full acquisition since the building footprint is on the property line (refer to Figure 4.3-11). CC-5-35

- The existing property on the southeast corner at Imperial Highway and Garfield Place is currently designated to have the parking lot removed and protecting the building in place. This will likely result in the parcel not complying with City parking requirements thus Metro should consider a full acquisition.

- The partial acquisition of the 10920 Garfield Avenue property might not be possible as it is currently undergoing a multi-million-dollar residential development (refer to Figure 4.3-13). Metro shall coordinate with the property owner to determine feasibility, as well as to communicate the potential noise and vibration impacts of the elevated tracks. CC-5-36

- The West Santa Ana Branch corridor is proposed to be constructed through residential, commercial, and industrial areas of the City. Those areas are primarily inclusive of older development that needs a significant infrastructure upgrade review. Conduct a detailed review of the utilities and substructure within the areas of the train stations to assess capacity and service needs. CC-5-37

- Partial property takes left from property acquisition should result in additional parking due to lack of available space for vehicles. CC-5-38

Section 4.5. Air Quality. Table 4-5-9.

Table 4-5-9 indicates there would be a significant decrease in air emissions between 2017 and 2041. The decline in emission would occur even with an increase from approximately 463.25 million vehicle miles travelled (VMT, 2018) to approximately 606.33 million VMT in 2042. According to the Draft EIS/EIR, these emission reductions between 2017 and the year 2042 can be attributed to alternative-fueled passenger vehicles (i.e., electric and natural gas) added to the vehicle fleet and continued improvements in fuel efficiency. The Draft EIR/EIR states that, "the incremental increases in particulate matter emissions relative to Existing Conditions are solely attributed to ambient regional population growth spurring additional regional VMT and associated road dust and break and tire wear. As regional air quality continues to improve in the future, the deposition of dust on roads will be reduced." First, we are confused as to both the accuracy and the relevance of the last statement. Secondly, did the year 2042 estimates also consider the off-site emission generated as part of the energy production required for the alternative powered vehicles? CC-5-39

Section 4.5. Air Quality. Analysis of Alternatives Table 4-5-10 and 11

The analysis of air quality impacts for the operational scenarios appeared to focus only on the VMT reductions. Did the emissions calculations consider the offsite emissions related to the generation of electrical power for the trains themselves and the other project elements (lighting, signals, station equipment, etc.)?

Section 4.6. Greenhouse Gas

The analysis of the proposed project's greenhouse gas (GHG) impacts relies on VMT reductions to demonstrate that there would be a GHG benefit. While we do not argue that reducing freeway congestion would be beneficial in reducing GHG emissions, it appears that Table 4.6.2 tries in establishing a connection between the operation of the LRT and the consumption of electricity and the attendant off-site GHG emissions. The analysis relies on light rail vehicle revenue per mile. We don't understand why the Draft EIR/EIR didn't just provide an estimate of electrical consumption with the resulting GHG emissions associated with the consumption. CC-5-40

Section 4.6. Greenhouse Gas. Table 4.6.5

The second row of Table 4.6.5 is labeled "LRT Propulsion." Does this refer to offsite electrical power generation? The analysis of the proposed project's greenhouse gas (GHG) impacts relies on VMT reductions to demonstrate that there would be a GHG benefit. While we do not argue that reducing freeway congestion would be beneficial in reducing GHG. It appears that Table 4.6.2 tries to make a connection between the operation of the LRT and the consumption of electricity and the attendant off-site GHG emissions. The analysis relies on light rail vehicle revenue per mile. We don't understand why the Draft EIR/EIR didn't just provide an estimate of electrical consumption with the resulting GHG emissions.

Section 4.7. Noise

According to the Draft EIS/EIR, the potential noise impacts would largely be the same for all of the project alternatives for both the at-grade or aerial segments. The noise analysis included in the Draft EIS/EIR is very confusing in its reference to "clusters." For example, the Draft EIS/EIR states, "Alternative 3 would affect clusters 33 through 347 and would result in moderate impacts at 59 of 289 Category 2 clusters and severe impacts at 153 Category 2 clusters. Impacts at Category 3 clusters would remain the same as Alternatives 1 and 2." The use of graphics would assist the CC-5-41

reader in identifying the location and extent of the affected properties. This narrative is not meaningful without any exhibits or reference maps.

Section 4.7.4.2. Noise Mitigation

Mitigation Measure NOI-1 indicates that sound walls would be placed at the edge of the right-of-way or at the edge of aerial structures to reduce noise related to light rail transit vehicles at the identified sensitive receiver locations shown in NOI-1 where moderate and severe impacts have been identified based on design completed to date. Height and length will be verified during final design to meet Federal Transit Administration requirements. A better exhibit indicating the location and extent of these sound walls in the EIS/EIR is requested. (The sound wall notations in Exhibit 4.7-9 are very difficult to read.) In addition, an exhibit included in the Aesthetics analysis would also be very helpful. We would also request the analysis be expanded to include a description of the proposed sound wall (including the height). What other mitigation is planned…vegetation? Finally, there must not be any breaks in the sound wall. CC-5-41

The Draft EIS/EIR indicates that crossing signal bells at the locations identified in Table NOI-4 would be equipped with shrouds to direct bell noise away from sensitive receivers. With these shrouds, the crossing signal bell noise would not exceed 104 dBA SEL at 50 feet. We understand the need for these crossing signals for both pedestrian and vehicular safety. However, we question whether these shrouds will be sufficient mitigation given the potential headways during the late night and early morning periods.

In addition, Metro should coordinate with the Union Pacific Railroad to assess the feasibility of implementing a silent (hornless) freight train crossing programs at all at-grade crossings within the City.

Section 4.9 Geotechnical, Subsurface, and Seismic Characteristics

The Draft EIS/EIR provides a general overview of the soil characteristics of South Gate and the project area. The soils are alluvial and very sandy and many of the larger construction projects have had to use jack hammers during the construction phases. The Draft EIS/EIR did not indicate any special construction measures that would be needed during the construction of the aerial guideways or other project elements that might be required given the area's unique soil characteristics. CC-5-42

Section 4.12 Energy. Table 4.12.4

The Table include in the Draft EIS/EIR compares the direct and indirect consumption of energy for the various LRT alternatives with the "No Build" alternative. As shown in Table 4.12.4, Alternatives 1 and 2 would reduce regional energy consumption from the No Build Alternative by 515,569 MMBTU (0.06 percent net reduction). The reduction in regional energy consumption represents a conservation potential of 515,569 MMBTU annually relative to the No Build Alternative, and the reduction is consistent with objectives of regional planning strategies to reduce reliance on fossil fuels and non-renewable resources. Given the expenditure for the entire project, the resulting energy savings does not appear to be significant. Can the figures outline in the aforementioned table be correct? Do these figures consider the State's goal for eliminating the sale of fossil fueled vehicles by 2035? CC-5-43

Section 4.18 Safety and Security

The Draft EIS/EIR indicates that pedestrian and bicycle safety during operation "would consider safety along the alignment, at station locations, at designated crossings, and at proposed parking facilities. Pedestrian safety issues would mostly apply to proposed at-grade stations and less to the proposed underground and aerial LRT facilities, as underground and aerial stations can be designed to avoid these concerns. Additionally, the underground and aerial stations would avoid potential conflicts between pedestrians/bicyclists and motor vehicles that would occur with the at-grade stations." These statements are good though what evidence is there that these goals can be implemented. No specific measures are identified…only general statements. In addition, will the additional security required for the three South Gate stations require City resources? Finally, we are concerned about the safety of the pedestrians in the trunnels that are proposed at the Firestone Station

CC-5-44

Inclusion of Eco-Rapid Transit Comments dated September 25, 2021

The City of South Gate is submitting additional comments related to the EIS/EIR developed by the Eco-Rapid comments West Santa Ana Branch Transit Corridor Draft Environmental Impact Statement/Environmental dated September 25, 2021, in its entirety as additional comments being submitted by the City. The September 25, 2021, correspondence is attached for reference.

CC-5-45

If you have any questions, please contact me at cjeffers@sogate.org.

Sincerely,

Chris Jeffers
Interim City Manager

Cc: South Gate City Council
Erika Soriano, Acting Housing Administrator
Art Cervantes, Assistant City Manager/Public Works Director
Raul Salinas, City Attorney

ECO-RAPID TRANSIT

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City of Glendale

City of Huntington Park

City of Maywood

City of Paramount

City of South Gate

Burbank-Glendale-Pasadena Airport Authority

September 25, 2021

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

Re: Comments West Santa Ana Branch Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report

Ms. Khanna,

Section 1 – Support Alternative 1, Design Option 2

Eco-Rapid Transit has reviewed the West Santa Ana Branch (WSAB) Transit Corridor Draft Environmental Impact Report/Statement and **unanimously supports the selection of Alternative 1** (Los Angeles Union Station to Pioneer Station) and **Design Option 2** (Addition of Little Tokyo Station). The Eco-Rapid Transit Board of Directors strongly believes that working together with the Los Angeles County Metropolitan Transportation Authority (Metro) and our elected representatives, we can obtain funding to build this line in an equitable, sustainable and responsible manner. Our communities were strong supporters of Measures R and M transportation sales tax measures that are being used by Metro to fund the local portion of the WSAB light rail project.

As much as we support the project, our cities - especially after the COVID-19 impact on local brick and mortar retail businesses and the subsequent loss of sales tax revenues - do not have the financial means to provide the 3% local match within the required 5-year period. We ask that Metro work with the cities to reduce the amount of local contribution and on identifying non city general fund revenue that can be utilized to satisfy this requirement. Additionally, Eco-Rapid Transit requests that the existing 5-year time frame be extended through the life of the project and that the cities located in the southeast Los Angeles only be required to pay its fair share of the 3% local contribution for the operating segment that directly benefits the Gateway Cities region from Artesia to Slauson.

Eco-Rapid Transit recognizes the importance of balancing the *need* to create a high-quality sustainable light rail transit line that can provide 100 years of service with the *cost*. We appreciate the challenge of obtaining sufficient funding to build this project. For our communities, this is also a question of fairness and equity. As a region comprised of Environmental Justice communities that are adversely impacted by environmental and socioeconomic factors which affect the health, environment and quality of life of the local resident on a regular basis, we expect to be treated fairly and given the same consideration as past Metro projects serving other more affluent areas of Los Angeles County. As a **Justice40** project, under the President Biden administration, we recognize the importance of moving forward quickly together to be able to secure the federal funding necessary to complete this environmentally friendly, sustainable and equitable transit project. To help ensure eligibility for this funding the Locally Preferred Alternative should be Alternative 1, Design Option 2 so that the entire line, all possible phases, has a CERTIFIED environmental analysis completed prior to availability of funds.

Section 2 – Eco-Rapid Transit

Eco-Rapid Transit, also known as the Orangeline Development Authority (OLDA), has been the leading advocate for the WSAB project. Eco-Rapid Transit consists of 12 members including the cities of Artesia, Bell, Bell Gardens, Cerritos, Cudahy, Downey, Glendale, Huntington Park, Maywood, Paramount, South Gate and the Burbank Glendale Pasadena Airport Authority. Since 2002, the members have consistently supported a one seat ride to Union Station (Alternative 1) because of the regional connectivity of a one-seat trip, resulting in a superior vehicle miles traveled (VMT) reduction and resulting in high transit ridership under this Draft EIR/EIS alternatives analysis. Eco-Rapid Transit supports Design Option 2 because it connects our residents to important jobs and activity centers providing direct access to key downtown destinations and beyond to East Los Angeles and eventually Whittier, simultaneously connecting residents from those areas to the job rich industries in Gateway Cities.

Through the leadership of the Eco-Rapid Transit Board of Directors, the WSAB was funded as part of Measure R and Measure M. In the 1980's former Los Angeles County Supervisor Don Knabe, (at the time a Cerritos City Councilmember) proposed a rail line along the West Santa Ana Branch. Since then, Eco-Rapid Transit was formed and then collaborated with Congressmember Alan Lowenthal (then a California State Senator to secure initial funding in Measure R, actively participated in and selected the initial stations in the SCAG Alternative Analysis, contributed to the Metro Technical Refinement Analysis and partnered with Gateway Cities COG to secure Metro funding as part of the 2016 Measure M local transportation sales tax. It must be remembered that together with Gateway Cities COG, we opposed Measure M until Eric Garcetti, Metro Chair and then Metro Board of Directors agreed to accelerate the Measure M funding allocation from FY 2041 to 2028 as part of a public private partnership. Eco-Rapid Transit pledges to continue to partner with Metro to seek and secure financial options to help Metro keep their promise to our communities. This promise includes partnering on federal and state funding requests to build this project in a timely manner using Public Private Partnerships, bonding, financing, and other funding options to complete the project from Artesia to Union Station by 2028.

Section 3 – Eco-Rapid Transit Recommendations

Eco-Rapid Transit, believes the federal and state environmental laws were created to help and protect the health of our communities and concurs with Metro about the purpose and need for the project. Eco-Rapid Transit supports the goals identified in the Draft EIR/EIS as well as the study area identified in the Executive Summary and in Chapter One of the Draft EIR/EIS. However, Eco-Rapid Transit, having worked with SCAG, Metro and the communities through a number of previous studies, does not want to limit the construction of the transit corridor to funds on hand and has the following specific recommendations and comments on the EIR/EIS that support the development of a transit line that is sustainable-environmentally and economically, equitable and creates healthy, vibrant and prosperous communities. We believe addressing our concerns will promote the following values, consistent with NEPA and

CEQA laws, as well as the goals of the project. Therefore, Metro should select the project that will:

- Protect the communities and their sensitive land uses from Potential Significant Environmental Impacts.
- Maximize Economic and Community Development opportunities and not preclude them by construction design.
- Maximize opportunities for current local businesses and residents to thrive and not be displaced.
- Maximize Local, State, and Federal funding opportunities with environmental certification of a phased project, acknowledging the possible need for supplemental environmental documents for detailed aspects of each phase.
- Recognize the real impacts and create, implement and monitor mitigation measures that effectively reduce potential adverse impacts to a level of insignificance during construction and following the project completion.
- Build a quality, state of the art, regional transportation line
- Minimize construction impacts including, but not limited to, traffic impacts associated with the diversion of tractor trailers and passenger vehicles onto secondary arterial and residential streets as well as additional construction impacts discussed below.
- Plan for Safety and Security of system during project construction, anticipated future development surrounding the route, and operations through the deployment of video technology at station locations used to supplement local law enforcement.
- Minimize Noise, Vibrations and the generation of particulate matter from constriction and brake dust for all sensitive land uses, receptors and businesses with sensitive receptivity.
- Analyze housing, community development and recreational opportunities at staging and parking sites for the project.
- Promote and provide connections to other modes of transportation along the route including bike and pedestrian trails as identified in local bike plans and existing walking trails and providing adequate parking for residents and workers connecting to transit.
- Analyze potential climate adaptation strategies that promote compatibility of the project with climate change over time.
- Provide adequate parking to support station location on site and/by way of satellite parking structures supporting both transit and local businesses.

Section 4 – Additional Eco-Rapid Transit Specific Recommendations:

Eco-Rapid Transit has specific comments that it suggests need to be addressed to meet the community and system needs as required by environmental law:

1. Bell Gardens and Maywood should be included in all analysis as identified in the WSAB Transit Corridor Study Area map and the analysis in pages 1-4, 1-6 and 1-7. The EIR/EIS needs to include connectivity from the WSAB stations to Bell Gardens and Maywood. Both communities need to be included in first

mile/last mile analysis as described in the FTA/Metro/Eco-Rapid Transit/South Gate TOD SIP.

2. Impacts to the commercial corridors and businesses require a more robust mitigation program. The corridor is home to three unique historic main streets: Pacific, Bellflower and Pioneer Boulevards. Each will have significant impacts during construction that will need to be mitigated through a business interruption fund. Addition mitigation measures should be developed and implemented to effectively render potential impacts to a level of insignificance at regional shopping centers including, but not limited to, the Los Cerritos Center, Azalea and the Cerritos Auto Square during construction. It should be applied in station areas and along the entire corridor. The mitigations outlined in COM-1, Pg. 4-632 and Appendix CC are insufficient to support these business districts and help them thrive long enough to welcome new business once the line is opened. For example, allocate funding and technical expertise for a community-based marketing, branding and outreach initiative similar to Go Little Tokyo, that is specific to unique main streets such as Pacific Boulevard in Huntington Park, to support local businesses during the construction period. Create programs with the local businesses to support them including similar to the Crenshaw/LAX transit Corridor Community Benefits Program.

3. Similarly, as stated in the Draft EIR/S, large portions of the project are in heavily industrial areas. Manufacturing and distributing goods mean there is significant goods movement throughout the street system by way of large tractor trailers. The impacts to the movement of goods will result in the diversion of tractor trailers onto adjacent arterial and residential streets that are not designated for such traffic there by resulting the adverse traffic impacts that are not addressed. Additionally, changes to the streets, freeway access, turns all affect truck traffic—their ability to move through the area and the time it takes for them to travel through the impacted Study Area must be analyzed in greater detail. There needs to be discussions with local municipalities about designating alternative truck routes so as to minimize impacts to the respective communities and local businesses to ensure their needs are met during construction and after operations commence.

4. Additionally, in Appendix CC, 5-12 it states that one of the consequences of construction will be the relocation of businesses to other parts of the county. Businesses thrive in areas where resources and labor are available and where their customer base exists. Just because there may be buildings that can house a business elsewhere, does not mean that the subject business should be relocated outside of the jurisdiction nor that they can survive in that new location. A specific business relocation plan needs to be developed that requires businesses to be relocated within the original jurisdiction, to the extent that is feasible. If such an option is determined infeasible, then a market analysis should be conducted to determine the most suitable

relocation property. Loss of businesses means the loss of jobs and potential sales tax revenue for the local municipality. This is an especially difficult impact for this EJ area. Part of the mitigation plan should include local worker hiring and training as well as a plan to utilize local minority business enterprises.

5. Metro should conduct an objective feasibility assessment, as requested during the Initial Study, comparing above grade and below grade options at 183rd Street and Gridley Road located in the cities of Cerritos and Artesia. The assessment should examine engineering, design and cost factors as part of this analysis. This should be an open process with concurrence and participation from Gateway Cities COG, Eco-Rapid Transit and the cities of Artesia and Cerritos.

6. Eco-Rapid Transit supports options, previously discussed publicly, for the potential development of two future stations: (1) at the Rio Hondo Confluence, and (2) in Cerritos between Studebaker and Gridley. While we understand the difficulty of including these stations in the current analysis, we do believe that the current design and analysis must not preclude the potential for these stations to exist in the future. Accordingly, Eco-Rapid Transit request that an environmental assessment be prepared as a supplement to the WSAB EIR/S in order for the Rio Hondo Confluence and Cerritos stations to exist at the discretion of the respective local municipalities.

7. Addressing issues of handicapped accessibility, visual blight, neighborhood barriers and sound, Metro should look at new technologies that improve the sustainability and lessen the environmental impact of the transit project, including assessing a low floor vehicle option, wireless charging/electric generation and high resilient rail fasteners. With the exception of Baltimore and LA Metro, all of the other light rail transit systems in the United States and Canada operate low floor vehicles. Since the WSAB line is not proposed to be interconnected with any other Metro light rail lines, this line could use newer technologies without interfering with the existing system. Additionally, throughout the world transit is switching to more energy efficient and sustainable models including electricity generating braking with station charging, which lowers the cost of operations, reduces the number of electric substations required along the route and may provide sufficient electricity to power the station areas themselves. This also would eliminate the need for the catenary system, reducing visual blight and costs.

8. Declaring that the entire line is an Environmental Justice (EJ) Corridor, so any negative impact is not of significance, since the entire corridor is treated the same, is an oversimplification of facts and a misreading of FTA's EJ rules. The development of this corridor should be provided the same amenities as other

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Chair
Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair
Sean Ashton
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City of Downey

Secretary
Vrej Agajanian
Councilmember
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Treasurer
Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor
Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director
Michael R. Kodama

General Counsel
Matthew T. Summers

Ex-Officio
William Rawlings
City Manager Representative

transit corridors that are not considered EJ. The entire WSAB Transit Corridor Study Area (as illustrated in Figure S-1. WSAB Transit Corridor Study Area) should be analyzed as an Environmental Justice (EJ) Corridor. Metro's own goals for working with EJ communities is to strengthen the networks and create opportunities for the EJ communities to work with Metro for their improvement. This "study" does the opposite of the goal. It does not recognize that a community is designated an EJ community because it has significant environmental issues. Every impact in an EJ community that negatively changes the environment is significant.

9. FTA and DOT's guiding EJ principles include: the desire to avoid, minimize or mitigate disproportionally high and adverse human health and environmental effects, including social and economic effects on minority populations and low-income populations. Doing so will help prevent the denial of, reduction in, or delay in the receipt of benefits by minority and low-income populations. The current EJ analysis and lack of adequate mitigations does not accomplish this identified principle.

10. Housing is a critical issue for Los Angeles County. The county cannot afford to lose a single residence. Where it is necessary to acquire residential property to construct this transit line, it is also critical to recognize these lost housing units cannot just be lost. One cannot agree with the statement on 4-35 that "there is sufficient replacement housing" in the county. Additionally, this section 4.3 also states the number of occupants incorrectly. The density of individual's living in this area is the highest in the county. Due to the cost of housing, there often is more than one family living in a single-family residence. The housing lost should be replaced by comparable housing types and affordability. This section additionally, like many other sections of the Draft EIR/S makes reference to Metro policies without providing a link to them, so it is very difficult if not impossible to evaluate the fairness to an individual being impacted by property acquisition.

11. Housing that loses its backyards may be able to exist, depending on the amount of private space lost, the loss of open space (4.3) also creates negative impacts on residents. These communities are park poor. Removing the backyards further impacts the requirement for private open space. Similarly, removing trees, that help reduce the heat island effect in urbanized areas and create more livable neighborhoods adversely changes its character. Several of the cities have been working hard to plant trees to improve air quality and address climate adaptation in their communities. It is recommended that each tree removed, be replaced with two comparable trees deemed most suitable for the placement with corresponding upkeep until such trees are fully established. It is important for the communities and will help mitigate the corridor's impact on the environment.

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12. Metro should work with Eco-Rapid Transit, Gateway Cities COG and the Gateway Cities City Manager Technical Advisory Committee (TAC) to expand the definition of the local 3% contribution to Include the planning and projects of cities that they have undertaken in anticipation of the development of this line. Cities and government agencies have been working together for over 20 years in anticipation of this project as evidenced by Caltrans improvements on the I-105-Freeway as well as related improvements along the corridor completed by local municipalities that support the WSAB. These planning and implementation costs incurred by cities should be included in calculating the local 3% funding contribution. An additional issue of fairness and equity is that Gateway Cities should only pay the 3% local contribution for the portion of the line directly adjacent to Gateway Cities. The City of Los Angeles should cover the Los Angeles portion of the line. An example of how this was done in the past is illustrated in the example of Inglewood and Los Angeles along the Crenshaw Line.

13. Whichever Maintenance and Storage Facility is chosen, it needs to be developed in a manner to reduce the impacts on the surrounding neighborhoods. This includes a landscape buffer, rails and connectors that reduce sound, quieter signals and sound proofing of maintenance building to reduce overnight sound. Earlier discussions with the Metro Maintenance Supervisor also indicated possibilities of joint recreation development of the site. Metro staff presentations have included pictures of the Santa Monica Maintenance Facility, yet the EIR/S says the improvements pictured – landscape buffering, parklike land, etc., will not be done at this facility. This is misleading. The WSAB Maintenance and Storage Facility (MSF) is adjacent to housing and commercial businesses and should include every mitigation that the Santa Monica Maintenance facility received. In both cases the proposed MSF facilities would be situated on open space that was used as a community gathering space. These are important community assets that will be a significant loss.

14. During Metro's public hearings and community meetings an estimate for cost of the Staff Preferred Alternative was shown to the public. It was primarily made up of Measure M funding that has already been secured and this prior identification of funds was used largely to justify choosing Alternative 3 as the Staff Preferred Alternative. Focusing solely on funding that Metro already has identified for the project not only locks in a lesser transit project but it eliminates the potential for Metro and/or other municipalities or entities to secure money for additional phases of the project that do not yet have identified funds as well as possible TOD and recreational opportunities that may only be feasible if they are included in the Locally Preferred Alternative analysis. For example, if housing funding was used to acquire some of the staging properties identified for the project with the commitment that the land would be used for residential purposes after construction then

transportation funding that must be used only for transportation purposes would be freed up to be used for other amenities and transportation features along the line. Another example could be if all identified (and potential satellite) parking sites were made into parking structures with recreational facilities on the top of the structure, transportation money could be combined with funding for recreational facilities to assist with acquisition of sites and promote recreation that could be accessed through transit.

The following comments have been prepared by Eco-Rapid Transit in accordance with the National Environmental protection Agency (NEPA) and California Environmental Quality Action (CEQA) law to effectively reduce any potential adverse impacts associated with the Metro-proposed WSAB project to a level of insignificance.

The following are specific comments by Section and Page.

Executive Summary

S-3 – Eco-Rapid Transit supports Alternative 1 (Los Angeles to Pioneer Station) and Design Option 2 (Addition of Little Tokyo Station)

Purpose and Need

1-3 Eco-Rapid Transit concurs with Metro's assessment regarding project need. The corridor has:

- High population and employment densities
- High number of transit dependents
- Environmental justice communities along most of the corridor from Little Tokyo through most of Gateway Cities.
- Significant goods movement activities along the entire corridor
- Significant increases expected in travel demand
- Operates with a constrained freeway and arterial system
- Limited travel options
- Limited connections to the Metro and Regional Rail System
- Limited Transit investment

The West Santa Ana Branch light rail transit project supports a high number of environmental just communities and rights a wrong that should have been addressed many years ago.

Page 1-4 Eco-Rapid Transit concurs with Metro's Project Goals:

- Goal 1: Provide Mobility Improvements
- Goal 2: Support Local and Regional Lan Use Plans and Policies
- Goal 3: Minimize Environmental Impacts
- Goal 4: Improve Cost Effectiveness and Financial Feasibility
- Goal 5: Promote Equity

Page 1-4, 1-6 and 1-7 – Eco-Rapid Transit concurs with Metro's identification of the existing study area. The EIR/S changes the boundaries of the Project Area from 50' to 1 mile, without a real explanation as to why the impacts would change to a smaller area, especially during construction. On page 1-5, Section 1.3.1, Metro identifies the cities of Maywood, Huntington Park, Cudahy, Bell Gardens and South Gate as multifamily neighborhoods. Eco-Rapid Transit believes that the City of Bell should also be included on this list. Eco-Rapid Transit concurs with Metro that the study area maps on page 1-6 and 1-7 identifies the study area and shows significant population and employment density in the corridor.

Page 1-9, Figure 1-4 Activity Centers - The figure and analysis are missing important activity centers in the corridor such as Pacific Boulevard in Huntington Park, Bicycle Hotel and Casino in Bell Gardens, the Columbia Memorial Space Center in Downey and River LA recreation area along the Los Angeles River.

Alternatives Considered/Project Description

Page 2-15, Figure 2-2 – Eco-Rapid Transit appreciates the inclusion of High-Speed Rail from Burbank Airport to Union Station and the Link Union Station Project. Is the LA Streetcar project included in the analysis? This could potentially connect Broadway, 7th/Metro and 7th/Alameda together and provide Downtown Los Angeles connectivity with a proposed Alternative 1 alignment to Union Station.

Transportation

Page 3-72 When was the parking study conducted? Parking analysis conducted as part of the Near-Term Scope and Metro TOD SIP seems to be missing. There is a conflict between this study, prior studies and experience. Additional parking study to determine accurate parking demand is needed. Metro also needs to analyze the potential for joint development opportunities for all parking sites, the potential for satellite parking sites, and amenities for parking (and TOD development) using the Metro/Eco-Rapid Transit report, Transit Oriented Development Strategic Implementation Plan (TOD SIP) and comparable examples such at the South Pasadena Mission station, the Pasadena Del Mar station and the Claremont station. Any additional parking demand uncovered in a more adequate parking study should be provided to prevent severely impacting transportation in the cities most in need of parking or drawing additional parking to station areas.
Page 3-73 The parking analysis claims that the parking occupancy numbers were gathered during observations made during peak parking periods. According to information in the Appendix, the parking analysis in the corridor was conducted at various times Tuesday through Friday in September, 2017, therefore claim that the parking occupancy information was gathered during peak parking periods is false and is not acceptable for any parking study. The parking study should include morning, mid-day, afternoon and evening parking counts. It should be conducted on a weekday (Tuesday, Wednesday or Thursday) and weekend (Saturday or Sunday). It should account for specific local conditions. It should include public and private parking in the station area (current and future, FY2042).

Page 3-78 The statement that there will be no parking spillover because no transit parking is provided does not make sense and is not backed up by any parking analysis in this report. Use of street parking may still be considered as spillover and must be calculated and mitigated or the analysis is inadequate.
Page 3-105 Parking monitoring is not adequate. The parking monitoring system needs to be based upon a set of guiding parking principles agreed to by Metro and the local jurisdictions. It should be a comprehensive on and off-street parking analysis by block, station area and for the corridor. This allows use of parking resources at various stations to meet Metro parking demand. The monitoring system should be inclusive of all parking users and not focus only on Metro customers. It must include and yet not be limited to visitors, customers, employees, residents and Metro commuters. It must analyze and reduce potential parking spillover issues, especially in existing residential neighborhoods.

Affected Environment and Environmental Consequences

Page 4-3, Table 4.0.1 - The Safety and Security thresholds in the environmental document are not substantial enough (Section 4.1.1.1, pg. 4-3 table) - 100 feet is too little to adequately address safety concerns - 0.25 mile is 1,320 feet so 100 feet is barely over 0.01 mile. Safety and security is important during construction and in the station areas. The feasibility of patrol in every station should be assessed, both during construction and operations.
Page 4-9 - It appears analysis checking for consistency with local plans looks primarily at general plans and bicycle plans but no CAPS or otherwise local master plans/development plans (Table 4.1.4). All adopted land use documents pose potential conflicts with the project and should be analyzed.
Page 4-11 – WSAB provides important access to jobs and institutional/public facilities, medical facilities and recreational uses.
Page 4-13 to 4-29 - Acquisitions and Displacements. Any acquisition that is not specifically for realignment, rail, or a station should be analyzed for the potential to later be used (even if shared) for housing, recreation (active and/or passive), economic development, and parking replacement.
Page 4-17 – Eco-Rapid Transit and Metro approved the transit-oriented development strategic implementation plan (TOD SIP). This is an important document that provides policy direction in the corridor. In addition, the City of Huntington Park's General Plan Update includes Target Areas for Transit Oriented Development (TOD) to be reflected in table 4.1.4 under "Policies for compact and denser development, including TODs".
Page 4-17 - The alignment for Alternative 1 has no impact making it an acceptable choice for the Locally Preferred Alternative (LPA).
Page 4-18 – Eco-Rapid Transit believes that the removal of parking and lack of commuter parking in Huntington Park and Downey can have serious and significant impacts in communities that already suffer from parking impacts. Much of the neighborhood near the Huntington Park stations are overcrowded with multiple families sharing housing. Many of these families have multiple cars and struggle to find parking spaces for their vehicles. At Gardendale, Eco-Rapid Transit and the City of Downey anticipate future development efforts will require additional parking, with the number of boardings higher than that projected in the Draft EIS/EIR. There is a need to consider the impact of Metro commuter parking at this site to prevent

residential spillover into both Downey and Hollydale (in South Gate). Hollydale is adjacent to the Gardendale station. This is also an issue at the Pioneer Station in Artesia. As indicated in the EIS/EIR study, the Artesia terminus station does not have sufficient commuter parking, in an area that is already deficient in parking spaces.
Page 4-18 - In terms of station design, what will be the experience of the rider when they emerge from the station? (Was that experience analyzed for impacts?)
Page 4-19 - Street closures. The document suggests no division to community and no affect because access is still possible despite permanent road closures – what would that actual affect be?
Page 4-19 – Barriers. What specific impacts to truck traffic for turning restrictions? Actual design of barriers – visual blockage? How will this be mitigated?
Page 4-19 and 4-20 - Pedestrian Bridges. Demolishing an aerial bridge and replacing it with an underground tunnel might have safety and security impacts that need to be mitigated/avoided/minimized. Metro is responsible for the change, not the school district, so expenses incurred for an increased need in safety and security should be incurred by Metro as a proper mitigation.
Page 4-20 - Property acquisitions. Why are there any partial property acquisitions? A property owner cannot be made whole when there is only a partial acquisition.
Page 4-22 - Potential in Alternative 1 to get mitigation funds to pay for bike plans for cities of Huntington Park, Cudahy, South Gate and Bell. Including this in the LPA and environmental analysis allows these cities increases in opportunities to secure funding for their bike plans and projects, e.g., eligibility for infrastructure grants.
Page 4-27 and 4-28 - Maintenance Facility. The MSF proposed in Paramount is less than ½ mile from Paramount High school, this could possibly affect traffic (bike, ped, car) along Rosecrans. Additionally, this is a community gathering space; resource that will be removed and there is no indication from the Draft EIR/S regarding replacement. There is no discussion of appropriate buffering from the residential neighborhoods.
Page 4-27 and 4-28, Figure 4.3-16 - Maintenance Facility. MSF in Bellflower. The stretch of property adjacent to Virginia Avenue (current BMX and northern recreational area) could easily be turned into a park to buffer the MSF from the adjacent residential uses. This was done at the MSF in the Los Angeles/Santa Monica area and should be analyzed and considered here. Also, it would be good to look into what funds might be possible to be used here like Quimby, rails to trails, etc. so that Metro is aware of possible funding and/or savings for this component of the project and since financing is part of the project goals.
Page 4-30 – Above grade alignment at certain locations could divide established communities. Some of the communities may prefer columns over berms and walls to reduce physical barriers.
Page 4-30, 4-31 & 4-37 - Acquisitions and Displacements. Tables 4.3.3 and 4.3.4 only represent the permanently displaced based on aerial structures, stations, TPSS sites, and grade crossings. There needs to be analysis on how many businesses (and employees) are likely to experience business interruptions during construction. Also, a table illustrating this analysis of business interruption needs to be introduced by alternative alongside the previously mentioned table.
Page 4-35 - Acquisitions and Displacements. The City of South Gate, as well as the nursery business owner, should be consulted about potential viable replacements should the nursery business be displaced. Additionally, there should be analysis that

accounts for residential displacements for residents currently living in rent-controlled units and relocation to market-rate units.

Page 4-35 - Communities and Neighborhoods. The SCAG 2016-2040 RTP/SCS is the document used for thresholds and goals. Did the smaller cities provide updated information to SCAG for this document? Is it accurate? It is not uncommon for smaller staffs to rely on larger entities to update information even if it is not the most up to date information. If it is not the most accurate data, Metro should ask cities to provide the most up-to-date accurate information to be plugged into the analysis so that proposed mitigations address the most pertinent impacts.

Page 4-35 and maps on page 4-37 - Communities and Neighborhoods. Do any of the stations pose a problem in cities based on access and mobility? Does the station reinforce community character and cohesion and how was this analyzed in the environmental document? Was community stability on a station by station analyzed? Access and mobility can mean parking provision, at grade crossings, turning restrictions, street closures and vehicle delay at intersections. Was analysis of this conducted for all traffic such as truck traffic and increased passenger traffic traveling to station parking areas?

Page 4-38 & 4-40 - Acquisitions and Displacements. 188 partial acquisitions (Table 4.3.1) for Staff Preferred Alternative 3. This far exceeds Alternative 1 with only 20 partial acquisitions. This is a great difference when it comes to construction interruption of residents lives and permanent changes to residential property.

Page 4-40 – Lack of commuter parking hurts access to stations in Huntington Park and at Gardendale and will impact neighborhoods from parking spillover.

Page 4-41 - Acquisitions and Displacements. Alternative 1 - no displacements of residents and only 1 business displacement (23 employees) with Design option 2. The Preferred Staff Alternative 3 would displace approximately 65 businesses (352 employees). Additionally, The City of Bellflower, as well as the sports park and BMX complex business owner, should be consulted about potential viable replacements should they be displaced.

Pages 4-41, 4-44 and 4-47 - Analysis of impacts to access and mobility, and community character in the Huntington Park Station Areas need to include impacts from the proposed design to existing pedestrian amenities such as wide and comfortable sidewalks, and existing street trees. Provision of minimum requirements and clearances for pedestrian access will not suffice in station areas, and areas of existing high pedestrian volume and/or distinctive community and main street character such as Pacific Boulevard and Randolph St in Huntington Park. Preservation of existing pedestrian amenities will need to be prioritized, or replaced in-kind and included in the analysis. In addition, the proposed designs of station areas need to ensure best-in-practice strategies for first- and last-mile connectivity improvements.

Page 4-56 – Since 87 to 89 percent of the residents have lived in their homes for more than one year, they are living in stable, existing residential communities that will need to be protected from potential environmental consequences. This is particularly important as we address both parking spillover and cruising for parking in stable neighborhoods that can exacerbate already poor air quality and traffic conditions in the residential areas surrounding the WSAB stations.

Page 4-42 - Acquisitions and Displacements. Phasing acquisition of a single site only helps Metro with relocation activities and does not reflect the complete scale of the business disruption created for those properties with special location considerations. This is not a sufficient mitigation for the difficulty created by having special

replacement needs. Consultation with the cities and property owners, with binding mitigation, would allow the property/business owners to determine what best meets the needs of their business(es).

Page 4-43 Acquisitions and Displacements. Displacement of businesses resulting in some permanent job losses by employees needs to be better mitigated by Metro. Offering to "coordinate with the appropriate jurisdictions regarding business relocation" does not guarantee job placement for employees with job losses. Job losses due to the project must be replaced with a concrete strategy articulated by Metro in the environmental document in order to illustrate that the problem created is completely addressed.

Page 4-46 - Acquisitions and Displacements. Having a MSF located directly adjacent to residents places noise, vibration, aesthetic, and potential air quality impacts on residents, many of whom may be considered sensitive receptors depending on health considerations and age. A landscaped and/or other aesthetically pleasing noise and air quality buffer between the MSF and residential uses must be present to offset these potential impacts.

Page 4-48 Visual and Aesthetics. Viewer sensitivity is a subjective threshold and is insufficient in determining the full extent of whether or not a visual or aesthetic impact is potentially created. Adhering to a similar scale, mass, form and lighting level does not address aesthetic degradation of a site when changes are made by the project. Also, compatibility with the visual character of a highly urbanized area is further inadequate in determining a potential significant impact in the area of visual and aesthetics. For example, the introduction of an aerial alignment rail may be considered compatible in visual character to an urbanized area but to a residential property owner who once had a view of the open sky and now directly faces a concrete railway, a dramatic impact is created. Treatment to railways visible to any residential property should be included as aesthetic mitigations. Strategic landscaping to preserve privacy for businesses and residents should be included as aesthetic mitigations. Landscaping stations and striving to make those stations aesthetically pleasing is a start in mitigation but is not sufficient in totality of mitigating visual and aesthetic impacts along the line in its entirety.

Page 4-49 - Visual and Aesthetics / Historic. The Navens Horse Stable needs to be analyzed as a scenic resource and views of it as scenic vistas. It is listed as a place of historic and cultural property and should not be discounted simply because of the materials that are standardly used for horse stables. Views of the horse stables contribute to the cultural character of the area and must be considered and mitigated when it comes to being a scenic resource.

Page 4-52 - Visual and Aesthetics. Section 4.4.2.3 Visual Character and Quality lists the categories analyzed and taken into consideration for each district. Suburban Residential Landscape Unit, and suburban Residential Units are mentioned in this section. However, when analyzing Figure 4.4-1, these categories are not included and are only included in 3 segments of Figure 4.4-2. Huntington Park, Bell, Cudahy, South Gate, Paramount, Bellflower, Artesia and Cerritos, as well as adjacent cities, should all be considered under the Suburban Residential Landscape Unit as the properties within less than a mile from the line are all part of a suburban development, often largely residential, that happens to have high density. The higher density of the population does not and should not negate the suburban development and character of these cities along the project line.

Pages 4-53 to 4-57 - Visual and Aesthetics. Table 4.4.2 often characterizes the visual quality of the area as "inharmonious, disorderly, and incoherent." These are often the mix of land uses, and the character areas in environmental justice communities are described. Metro should not discount the need for visual and aesthetic mitigations along the entire line because of its determination of the visual quality of such an area. Landscape buffers and visual treatments should be incorporated into the entire design and elements of the project, such as berms, columns, rail, and other planned improvements, to address the aesthetic impacts created by the project and improve the visual quality of the area, not simply replace like for like aesthetics, especially in environmental justice communities.

Page 4-57 Visual and Aesthetics. Eco-Rapid Transit believes the cities should be empowered by Metro to weigh in on how they want individual station treatments to be handled as mitigations in visual and aesthetic impacts.

Page 4-63 - Acquisitions and Displacements. Does Metro have an officially adopted internal acquisition and relocation policy? If so, what is it? It isn't sufficient to quote the law. There needs to be clear details on the process. For example, in relocation, how is FF&E handled, moving logistics as well as moving expenses, comparable location not just comparable compensation, etc.

Page 4-64 - Acquisitions and Displacements. Section 4.3.1.2 states "The purchase of an easement is accomplished through a one-time payment and an easement deed is recorded" This does not speak to how the easement will be maintained. Further, earlier in this section it is noted that there may be temporary easements. In Metro public presentations, the example of a sound wall as a temporary easement where the sound wall was constructed on private property under a temporary easement and once constructed the "property" was returned to the property owner. There is not discussion about maintenance or the type of long-term impact this may have on a property. To state that the property is still "economically viable" could mean it's worth more than zero but does not acknowledge the loss of property value due to the improvements introduced by Metro.

Page 4-65 - Acquisitions and Displacements. The paragraph that began in the page prior states that in order to satisfy NEPA property displacements were evaluated to determine if the use was no longer possible after project implementation. It does not speak to the lasting effect on that particular use. An example, a residence may still be feasible for residential uses and purposes but if the outdoor recreational space is compromised then the quality of the residential space is compromised. The quality of life or quality of land use performance and how it is affected (not whether it is simply possible or not) needs to be analyzed and compensation and/or relocation needs to be determined based on the totality of the effect on not just the use but the overall quality of life or use itself.

Page 4-66 - Acquisitions and Displacements Why isn't there a table showing construction impacts on acquisitions and relocations, why are only permanent property acquisitions represented? Without a synthesis of the construction impacts on acquisitions and relocations, it is more difficult to analyze the impacts of acquisitions and relocations during the time of construction which is likely to last years.

Page 4-67 – Can design considerations near the I-10 freeway be reexamined to reduce property purchases? This could result in substantial cost savings for the project.

Page 4-150 – Sound Walls in the Pacific/Randolph and Florence/Salt Lake Station Areas. The Huntington Park Bicycle Master Plan includes a proposed Class 1 Bike Path along the ROW on Salt Lake Avenue that would create additional first/last mile connections to the Florence/Salt Lake station from the surrounding residential communities. Constructing 8-foot-tall sound walls on both sides along some sections of the rail ROW per Metro's current design would create an unsafe condition for a future Class 1 bike path that will be visually cut-off from the surrounding development. Can the location, extents, and design considerations for the proposed sound walls along Salt Lake Avenue be reexamined to facilitate options for safe bike connectivity along this corridor? Additionally, the design of the sound walls disconnects the neighborhoods and create an unsafe environment and potential blighting influence.

Page 4-154 – Image 4.4-7 in the conceptual rendering indicates three sets of fences separating both the Light Rail line and the freight rail line in the proposed configuration (the existing condition with the freight rail does not have a fence currently). A single fence designed to maximize visual connections across both sides of the street could suffice to prevent pedestrians from trying to cross the tracks and enhance public safety, while too many fences will potentially create a hostile and unwelcoming urban environment. The fences used, should be designed to encourage, connectivity of the neighborhoods and utilize landscape design to lower sound and lessen environmental impacts.

Page 4-175 - Metro should reconsider the pros and cons of retaining walls versus columns at 183rd and Gridley.

Page 4-180 – The Pioneer Station needs to be designed to accommodate more than cars. The scale of the number of parking spaces needed and lack of the parking structure to accommodate additional uses may be prohibitive and unless properly addressed at a local level by the City of Artesia and will negatively impact potential development opportunities in the station area. The lack of sufficient parking for the terminus station, in addition to the closure of 187th Street, will inevitably result in residual adverse impacts to residential neighborhoods and local businesses in the downtown Artesia area as well as adjacent land uses located in the City of Cerritos. Therefore, additional satellite parking structures should be constructed in a manner to support the parking demand while supporting future commercial development. The parking structures should be designed to accommodate more than just Metro commuters, especially on evenings and weekends. Also, the current design plan shows a plaza located south of the station and adjacent to the parking structure. A public plaza to the north of the future station, not hidden to the south, is essential to provide visual and physical connectivity between the station and Downtown Artesia necessary to maximize the station's potential.

Page 4-189 - Visual and Aesthetics. Lighting located in a manner to protect businesses and residents from glare is essential in aesthetics mitigation. However, the level of lighting and placement of lighting must also reflect the safety and security needs along the alignment and station areas and transitions to station areas. Not introducing a lighting source in an area to avoid an aesthetic impact may create a safety and/or security hazard. For example, if a column is placed along the alignment but no lighting is placed underneath it so as to avoid an additional light source creating an aesthetic impact, that darkened portion of the property may become a problem both for keeping pedestrians off the alignment or for security of individuals who could then be subject to crimes. Studies indicate that lower levels of

lighting are more often greater areas of crime. Therefore, Metro should consider placing new sources of lighting in areas that could pose potential crime or safety issues and mitigate the aesthetic impact through placement and direction of the lighting itself. Thus, both sets of impacts are mitigated.

Page 4-190. Visual and Aesthetics. Wayfinding signage needs to be included in the development of any design standards used for the project and incorporated into all station areas with content directed by local municipalities and business owners (VA PM-1). If consistency with MRDC and Systemwide Station Design Standards do not include landscaping along the route itself, then this mitigation is inadequate. There must be treatments. Landscaping at the Bellflower MSF Site Option needs to augment existing landscaping at a minimum, as mitigation because the existing landscaping buffer is for a much less intense land use on the site (VA PM-5). Adhering to local zoning is not sufficient as an aesthetic mitigation, improvements should be subject to design review for affected local municipalities (VA PM-6); and Lighting should not be avoided as new sources but should be located and directed in a manner that is both aesthetically pleasing as determined by local entities and provides safety and security in darkened areas along the project (VA PM-7).

Page 4-191 - Visual and Aesthetics. Views of historic and cultural resources should be considered and analyzed as scenic vistas along the corridor.

Page 4-192 - Visual and Aesthetics. The CEQA requirement for determining if the Project would degrade the existing visual character or quality of the site and its surroundings does not qualify whether or not the Project is in an urbanized area (Checklist in Appendix G). To create a double standard for degradation of the site and its surroundings is to ignore potential Aesthetic impacts created by the project. It is not enough to avoid conflicts with applicable zoning and other regulations. This is addressed in analysis of Land Uses. The impact on the scenic quality of a site and/or its surroundings must meet a higher standard. One recommendation is to create a design review committee (using the Public Art policy Metro already employs, as a model) made up of local stakeholders to review potential aesthetic treatments wherever there is an aerial alignment, views from residences, station wayfinding signage, and view corridors to cultural and historic properties. The treatments agreed upon by such a committee should be binding. This is one possible mitigation strategy Metro can employ.

Page 4-193 – Eco-Rapid Transit recommends the inclusion of local artists from the impacted communities. This can be done by working with the local jurisdictions in the community.

Pages 4-193 to 4-196 - Visual and aesthetic impacts must be analyzed for the entire route, not just the station areas and/or areas called out by Metro. Any time the line is visible, a screening mitigation, special treatment, or potential visible impact to be mitigated needs to be considered.

Page 4-197 - Visual and Aesthetics/Safety and Security. Providing lighting only within the areas of the MSF may avoid potential source of glare issues but it might also create new safety and security impacts. The mitigation of aesthetics should not create impacts in the areas of safety or security. Both must be analyzed together.

Page 4-198 - Visual and Aesthetics. Does the project as proposed meet SCAQMD standards? (Even when cumulative impacts and existing conditions are taken into consideration?) Because if not, the project will be unable to secure federal (possibly state/local) funding for the project and that is contrary to the project goals. Do they meet the regional significance thresholds (need mitigation to meet)? Additionally, a

threshold for establishing potential significant impacts on odors needs to be established. One possible threshold Metro could use to mitigate odor impacts could be to provide a reporting mechanism by which if an odor source with five (5) or more confirmed complaints in the new source area over the period of one year is considered to have a significant impact on receptors and must be mitigated through odor elimination monitoring and established strategies of odor elimination.
Page 4-218 - Eco-Rapid Transit recognizes the importance of regional connectivity, transit ridership and a decrease in VMT. It provides more access to regional employment opportunities.
Page 4-226 - Air Quality. Alternative 1, Option 2 would reduce daily VMT by 218,500. Design Option 2 would decrease road dust emissions in direct correlation with VMT, impacts related to operational odors and dust would be less than significant and mitigation would not be required (not sure how odor impacts are less than significant when no odor threshold is being used). The significant VMT reduction should be taken into account when deciding upon the LPA since it has a great air quality impact advantage over the Staff Preferred Alternative 3.
Page 4-227 - Greenhouse Gases. The DEIS/EIR states that Metro has developed policies toward controlling GHG emissions but does not specifically state it will adhere to the policies that have been developed (adopted was not the work used which may imply these are considerations only and not adopted actions).
Page 4-228 - Greenhouse Gases / Air Quality. The study area for GHGs is six counties under SCAG jurisdiction. This would seem to dilute any meaningful analysis of GHG impacts created specifically by the project. Further, there seems to be an emphasis on substantially reducing VMTs in order to address GHG emissions yet the Staff Preferred Alternative 3 has greater VMTs then Alternative 1, Option 2 which would make Alternative 1, Option 2 more advantageous as the Locally Preferred Alternative (LPA) as it pertains to GHGs (and air quality).
Page 4-230 - Greenhouse Gases. If automobile exhaust is a majority contributor to GHG emissions then what role does truck traffic play?
Page 4-232 - Alternative 1 reduces more GHG than other options because of its regional connectivity. This needs to be acknowledged in the environmental document and should be used to support the selection of Alternative 1, Option 2 as the Locally Preferred Alternative (LPA).
Page 4-235 - Greenhouse Gases. The DEIS/EIR states that "Although SCAQMD has regulatory role in the South Coast Air Basin, it has not adopted or proposed any quantitative thresholds that would be applicable to the proposed LRT corridor" yet projects that do not adhere to SCAQMD thresholds may not be eligible for future funding. So, it would appear that the SCAQMD quantitative thresholds are very applicable to the LRT corridor if Metro has any interest in securing future funding.
Page 4-236 - Greenhouse Gases. Analysis of Alternative 1 states the alternative would generate direct GHG emissions through operations at the MSF and indirect GHG emissions through energy use (for operations). However, the analysis of Alternative 3 (the Staff Preferred Alternative) states there is no direct source of emissions because it excludes the MSF. The inclusion of the MSF in analysis for Alternative 1 and exclusion of the MSF for Alternative 3 not only appears arbitrary and unscientific in approach but actually skews the claim of the analysis supporting Alternative 3 when there appears to be no material difference between direct

emission sources. This discrepancy needs to be addressed where the same application applies to both alternatives.

Page 4-240 - Noise and Vibrations. Where does the definition put forth that "noise is generally defined as unwanted sound" come from? What is the source material or threshold? Further, the human body may be susceptible to noise frequencies the human ear cannot detect. The assertion that there is no physiological impact because the human ear may not be sensitive to a frequency may be an error and should be analyzed in the document. Also, vibration is more than just sound waves. There is a reference in the Noise and Vibrations section to what counts as operational noise and it includes items such as special tracks, bells, MSF operation, but it does not specifically state noise generated from the tracks themselves (not under special circumstances, just the sound made from the tracks). If the cars chosen for the project are not steel wheels on steel tracks, then no real analysis of what noise is being generated by simple track use has been included in this analysis.

Page 4-243 - Noise and Vibrations. Table 4.7.1 Levels of Impact analyzes impacts based only on community annoyance. There is no analysis here reflecting impacts on human health as it pertains to noise and vibration nor upon businesses (such as sound studios) which may be impacted in a manner that has nothing to do with community annoyance and more specifically in business interruption or compromise.

Page 4-244. Noise and Vibrations. Clearly the FTA Transit Noise and Vibration Impact Assessment Manual is being used as a threshold due to the partnership between Metro and FTA on the environmental document. However, is this a threshold that is used in environmental analysis for any projects outside of FTA's influence? What threshold is most frequently used to determine noise and vibration impacts as it pertains to CEQA and NEPA. It is unlike that the FTA threshold is an industry standard. Perhaps a more neutral threshold that is considered across a wide range of transportation projects should be used in the analysis of impacts as it pertains to noise and vibration.

Page 4-246 - Noise and Vibrations. Again, the FTA guidance document does not appear to be a strong enough threshold to determine true vibration impacts.

Page 4-248 - Noise and Vibrations. The document states that existing noise levels were identified at sensitive land uses. However, there appear to be sensitive land uses that were not taken into account such as schools directly adjacent to the tracks. Metro should provide the inventory and clusters it used and identify which are sensitive land uses. And any sensitive uses, such as schools, churches that provide daycare services, and any other use of builds that may or may not be consistent with the land use designations along the line should be included and analyzed.

Page 4-248 - Noise and Vibrations. The document states "Ambient vibration levels were not measured as part of this study because the FTA vibration impact assessment is not based on the ambient levels but rather on the FTA Vibration Impact Criteria". Most CEQA and NEPA studies on vibrations include an inventory of ambient levels of noise and/or vibrations. Stating that the project is located in an urban center and implying that high levels of noise is a normal part of the urban environment therefore negating the need for quantified data on vibration is inadequate analysis of the existing conditions of noise and vibrations, the quantified

increase to be expected, and how that increase in noise and vibration will be mitigated for both residents and workplaces.

Page 4-312 - Noise and Vibrations. Section 4.7.5.1 begins with what appears to be a CEQA checklist question for noise levels but the end of the question has been altered to reflect ""in excess of standards established by FTA or in the local general plans or noise ordinances" which is not from the CEQA checklist. The question to be addressed is if the project increases ambient noise levels period, not if it increases noise levels as determined by general plans, noise ordinances and the FTA. The analysis must include analyzing the increase in ambient noise and how it will be mitigated.

Page 4-314 - Noise and Vibrations. There are no noise impacts anticipated from the parking facilities, none. This seems unrealistic. The operation of a parking lot should generate some noise that did not exist prior to the existence of the parking lot. This should be looked at realistically based on the operation of a parking lot, analyzed and mitigations for minimizing any noise generated from the parking facility should be included in the environmental document.

Page 3-342 - Geotechnical / Seismic. The discussion in 4.9.2.4 should include discussion about water reclamation and how it might be captured.

Page 4-344 - Geotechnical / Seismic. Since the proposed LRT alignment crosses at least one seismic fault, what measures is Metro taking to ensure that trains are not derailed in during a seismic event (for at-grade, aerial and underground)?

Page 3-348 - Geotechnical/Seismic. When a detailed liquefaction evaluation is conducted, binding commitment to mitigate whatever is discovered out of that evaluation should be included in this environmental document.

Page 4-376 - Geotechnical/Seismic. Truck routes with vehicles carrying hazardous materials that are altered due to the project (and street closures) must be analyzed to see if they increase the risk of accident (and accidental exposure) to sensitive receptors and hazardous materials in general.

Page 4-383 – Hazards. The location and number of environmental concern sites should be used in the environmental justice analysis as justification for a larger EJ study area/corridor.

Page 4-386 – Hazards. Groundwater contamination concerns should be reviewed to see if water reclamation could help address any impacts to groundwater potentially created by the project.

Page 4-395 – Hazards. The risk of hazardous substance emissions is identical for both Alternative 1 and Alternative 3, no risk. So, choosing Alternative 1 as the LPA would have the same impacts as the Staff Preferred Alternative.

Page 4-405 – Hazards. HAZ PM-2 Disposal of Groundwater (Operational) - some of the municipalities along the line have water reclamation already in place. This should be looked at and considered as part of an incorporated strategy to mitigate disposal of groundwater during operations.

Page 4-406 – Hazards. Metro should consider (and analyze the potential for) funding to clean up contaminated soil in the project that does not require transportation money.

ECO-RAPID TRANSIT

Eco-Rapid Transit, formerly known as the Orangeline Development Authority, is a joint powers authority (JPA) created to pursue development of a transit system that moves as rapidly as possible, uses grade separation as appropriate, and is environmentally friendly and energy efficient. The system is designed to enhance and increase transportation options for riders of this region utilizing safe, advanced transit technology to expand economic growth that maximizes ridership in Southern California.
The Authority is composed of the following public agencies:

City of Artesia
City of Bell
City of Bell Gardens
City of Cerritos
City of Cudahy
City of Downey
City of Glendale
City of Huntington Park
City of Maywood
City of Paramount
City of South Gate
Burbank-Glendale-Pasadena Airport Authority

Chair
Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair
Sean Ashton
Councilmember
City of Downey

Secretary
Vrej Agajanian
Councilmember
City of Glendale

Treasurer
Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor
Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director
Michael R. Kodama

General Counsel
Matthew T. Summers

Ex-Officio
William Rawlings
City Manager Representative

Page 4-436 - Water Resources. Community stakeholders support a station located at the Rio Hondo crossing. Consideration of a possible future station at this location should be included in the analysis in this section.
Page 4-451 – Energy. The use of low floor vehicles, charging at stations only, energy generating brakes, and under carriage charging, would enable trains to be powered by more sustainable energy sources, mitigate aesthetic impacts at stations (and along the route if catenaries or wires were eliminated) and would reduce energy resource expenditures which is consistent with project financial goals.
Page 4-463 - Electromagnetic Fields. Again, charging trains at stations would eliminate electromagnetic emissions along the route and help protect potential negative significant impacts on human health.

Page 4-510 – Eco-Rapid Transit is impressed with Metro's ability to mitigate noise and integrate into the community at the existing Santa Monica Light Rail Maintenance Facility. A similar approach and design to the Santa Monica model is necessary for the selected WSAB Maintenance Facility. The same Maintenance facility construction and operations impacts exist here are they do in Santa Monica.
Page 4-525 to 4-535 – Access to parklands and recreational facilities are important in the WSAB corridor. Access to the Los Angeles River and River LA project is more than a bicycle facility. It is also an important future parkland, cultural center and recreational facility.
Page 4-539 - Parklands and Community Facilities. Salt Lake Park will have parking impacts, there is potential for a structure with a recreational field/sports facility on top of the structure which will mitigate the parking impacts and will be consistent with the Parkland use. It also opens up the possibility for funding from recreational sources freeing up transportation funds being used for the project.
Page 4-540 - Parklands and Community Facilities. Mitigation Measure LU-1 (Consistency with Bike Plans) is inadequate as a mitigation for impacts created on Bike Paths. Local entities and municipalities should not have to change their plans to match Metro. Metro should incorporate improvements and designs into the project that helps satisfy the adopted bike plans of the local municipalities. This would truly mitigate impacts and not just satisfy a law of compatibility. In the cities of Cudahy, Huntington Park, South Gate, Maywood and Bell, there are possible bike path/plan conflicts with WSAB project (potential impact and mitigations are the same for Alternatives 1 and 3). Metro is interested in providing language to all cities to alter their existing bike plans so that there is no longer a conflict. The cities are under no obligation to do so. This is why there is a mitigation and why it is considered a potential significant impact without mitigation. This mitigation measure seems insufficient to mitigate the conflicts. Metro should be proposing (and analyzing in the FEIR) mitigations for each city that enables them to fulfill their bike plans. For example, they should be paying for designs and potentially actual bike path improvements for each of these cities. Another possibility is to assist cities with securing grants to make those bike path improvements that would then be consistent with the WSAB project. This can be done and should be legally required under CEQA/NEPA (and lack of making such mitigations has the potential to affect environmental justice issues since these communities have residents often dependent on bicycles).

Page 4-550, 4.16.5.2 - Parklands and Community Facilities. There would be no danger of the increase and deterioration of existing recreational facilities if Metro were to provide additional recreational opportunities. Additional facilities on parking sites would be one option and is worth analyzing as a mitigation option.
Page 4-555 - Economic Fiscal Impacts. The Paramount and Bellflower MSF options do "not include the construction of recreational facilities or require the expansion of existing recreational facilities." This is inconsistent with Metro's message during public and community meetings where they showed a picture of the MSF in West Los Angeles/Culver City/Santa Monica that does have a recreational facility. A recreational buffer should be analyzed and included in the design plans for the project.
Page 4-557 - Economic Fiscal Impacts. A 0.25-mile and 0.50-mile area around the proposed station areas is insufficient as the area providing data for economic analysis. This limited geography is not a reliable way to analyze fiscal information and does not reflect the true economic conditions of the areas/cities affected by the project.
Page 4-559 – The local government agencies need revenue to support local services, like public safety, the cost of which will only increase for communities with stations. The impact of the 3% local share required by Metro puts an unfair burden on our environmental justice communities.
Page 4-559 - Economic Fiscal Impacts. Revitalization of underutilized or vacant parcels, encouragement of new housing near transit center, supporting pedestrians and bike facilities, and preserving or expanding of open spaces and recreation that is referred to in the environmental document in order to be realized, must be included in the design, environmental considerations and analysis, and used to identify new funding sources that are not solely transportation funding in nature.
Page 4-561 - Economic Fiscal Impacts. Direct local hiring to fill transit jobs and indirectly as transit workers spend their earnings can only be realized if Metro commits to these measures.
Page 4-563 - Economic Fiscal Impacts. The beneficial impacts to the regional economy will only happen if Metro commits to actions that analyze TOD development, economic opportunities and employment support in this environmental document.
Page 4-564 - Economic Fiscal Impacts. Business parking losses are expected. This is an impact that needs to be mitigated and is contrary to project goals. Additional parking, parking replacement spaces, and business retention and support strategies need to be analyzed and committed to in this environmental review.
Page 4-565, Table 4.17.5 – It seems that the General Fund Revenues should be higher in Alternative 1 and 2 than in Alternative 3 and 4 because of the access to Downtown Los Angeles and other regional destinations.
Page 4-566 - Economic Fiscal Impacts. Determining the magnitude of the business displacement impact by comparing the number of employees displaced to the total employment in the areas surrounding the proposed light rail line is an inadequate analysis of how businesses will be impacted by the project. Quantifying the number of businesses (and their employees) who will have their businesses and/or jobs eliminated needs to be included in the analysis.
Page 4-568 - Economic Fiscal Impacts. If the MSF is offering new jobs, then language about local hires needs to be considered and committed to in the environmental document.

Page 4-571 – Safety and security is important for the entire line. A successful safety and security program must be a partnership between Metro, local jurisdictions, businesses and residents. Additionally, local municipalities shall be entitled to ongoing Metro funding to offset the added cost of police services that will generated by the station areas. As with other explanation of mitigations, the study refers to a Metro policy (920-924), but does not explain the policy nor provide a link to find it.

Page 4-631 - Economic Fiscal Impacts. Impacts to businesses during construction are more significant than can be addressed by the Community Outreach Plan. There is no discussion of developing programs that meet the businesses needs or mitigate losses after meeting with the owners. More is needed than marketing.

Page 4-853 - Environmental Justice. The threshold definition of an environmental justice community must include quantifications and impacts to the human health of residents and workers in the cities identified in the study corridor.
Page 4-853 - Environmental Justice. The cities of Maywood and Bell Gardens were not included in the Environmental Justice analysis and are not considered affected by the project. These cities were included in the Metro study corridor and need to be included in all aspects of environmental review and analysis including the category of Environmental Justice. Connections between these cities and stations in Huntington Park and Cudahy need to be analyzed and included in the design for the project. Excluding the cities of Maywood and Bell Gardens is a significant negative impact to two environmental justice communities.
Page 4-854 - Environmental Justice. Environmental Justice communities are also those communities exposed to greater numbers/amounts of toxic industry than other communities. Exposure to this type of industry and human health risks in general must be made a greater part of the environmental justice analysis in the document.
Page 4-866, figure 4.22-4 – Maywood and Bell Gardens should be included on this map. They both have a significant low-income, minority population.
Page 4-869 - Environmental Justice / Noise and Vibrations / Transportation / Air Quality. Metro admits to unmitigated impacts, in addition to noise and vibration, in transportation and air quality. These need to be fully mitigated.
Page 4-871 - In South Gate, parking demand exceeds the amount of off-street parking provided by the project. This needs to be mitigated to that full parking is provided.
Page 4-873 - Environmental Justice. Permanent business displacement must be fully mitigated and not just financially compensated. Metro needs to work with the local cities to reduce these negative impacts.
Page 4-875 - Metro admits to unmitigated impacts in noise and vibration. These need to be fully mitigated.

Section 4(f) Evaluation

The protections afforded under the Section 4(f) evaluation have been in many cases underestimated or are in error. For example, Paramount High School is a publicly owned resource and functions as a recreational property for the community during off-school hours. While Paramount High School is listed as a Section 4(f) property, the off-school hours recreational function is completely ignored in the Appendix BB

analysis. Additionally, there are historic resources that are not acknowledged as needing protection under the analysis of this section.

The opportunity to leave these publicly owned assets in a better condition than prior to project has been ignored. For example, Salt Lake Park is listed as a property in need of protection under Section 4(f) yet the environmental analysis for the site states that the site will be left with insufficient parking (less than prior to the project construction and operation). Salt Lake Park is a good example of how an identified protected property can be left in a condition that benefits from the project. Increasing the parking for the park while providing new additional recreational facilities on top of the parking has not been evaluated. Such an improvement should be considered, analyzed and evaluated under this section.

Greater access to historic sites along the different alternatives has not been identified as possible greater benefit under Section 4(f). For example, easier accessibility to El Pueblo De Los Angeles State and Historic Monument from the

The Gateway Cities COG area could benefit from the state park through increased revenues and donations resulting from greater awareness of the historic resource. The analysis in Appendix BB is inadequate and the conclusions made in the DEIR/EIS as it relates to Section 4(f) are at best inaccurate and in many instances short sighted of the opportunities available to improve Section 4(f) properties.

Evaluation of Alternatives

Page 6-2 – How does the short line in Alternative 2 impact ridership? How does it impact the ability to compare ridership on Alternative 1 versus Alternative 2? While it costs $100 million more as part of Alternative 2, how would it change ridership if a short line was also proposed as part of Alternative 1?
Page 6-6 – Eco-Rapid Transit believes that there should be greater economic and community benefits for the entire line if the line goes to Downtown Los Angeles (Alternative 1 and 2) rather than stopping at Slauson (Alternative 3). Please explain your statement.
Page 6-13 – Does Metro have a more detailed explanation and a list of community groups opposed and those in favor of the Little Tokyo station? Eco-Rapid Transit has heard from a number of groups within Little Tokyo in support of the station.
General Alternatives Comment – For Alternative 1, Design Option 2, Little Tokyo is by far the primary transit ridership station. It is the station that would be used to not only access Little Tokyo, but also the Government Center in Downtown Los Angeles. Without this station riders have to transfer to Dow and destinations along the Gold Line going through East Los Angeles. This is one place that would require a below grade station. Cities and stakeholder groups have been working closely with Little Tokyo community members and the Industrial BID through this process (since 2009). Alternative 1, Design Option 2 should be chosen as the Locally Preferred Alternative.

Public Outreach, Agency Consultation and Coordination

Page 7-12 – The City of Maywood is also part of the Gateway Cities City Manager TAC and has attended their meetings.

Page 7-19 – Eco-Rapid Transit would like to see the Downtown Los Angeles survey, survey methodology and be provided more qualitative and quantitative analysis. An appropriate survey should include information related to population, sample size, sample design, data collection and potential sampling error. It should minimize sampling error and present data with a minimum of potential biases.

Areas of Concern

Many of our cities have the highest densities in the region. For example, Cudahy's density per acre is nationally second, only to Manhattan, Huntington Park is not far behind. All changes to the infrastructure impact their already taxed systems and facilities. The cities have reached their capacity to serve any additional increases in residences and demands on infrastructure. Any changes made by the project must address these local needs.

Eco-Rapid Transit is also concerned with safety and security of the entire WSAB project. It is important that Metro has detailed and clearly articulated plans to work with our cities and local law enforcement with the intention of eventually entering into an MOU with Metro so that there is an understanding of the roles and responsibilities. For example, this can include when someone calls 911 and crosses jurisdictional boundaries in the corridor. Metro needs to work with our cities to cover the additional policing costs anticipated with this project.

Eco-Rapid Transit believes that Alternative 1, Design Option 2 provides the best scenario for attracting state and federal funding as well as interest from the private sector. As with the Metro Purple Line, even if the WSAB is considered as a phased project, then the environmental analysis will already be certified and it makes the likelihood of future funding greater because the entire line is closer to shovel ready. Further, many funding eligibility requirements include the requirement for a certified environmental review and Record of Decision (ROD), not just inclusion in an environmental analysis document. Finally, it still allows for changes in the environmental document through an amendment or supplemental process.

Eco-Rapid Transit, Gateway Cities COG, Gateway Cities COG City Manager TAC, cities in the corridor and others have been working together with Metro to create a quality, energy efficient, sustainable, modern transit project within very difficult funding and cost constraints. We urge Metro to consider this as you review and address our comments.

ECO-RAPID TRANSIT

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The Authority is composed of the following public agencies:

City of Artesia
City of Bell
City of Bell Gardens
City of Cerritos
City of Cudahy
City of Downey
City of Glendale
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Chair
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Alejandra Cortez
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City of Bell Gardens

Executive Director
Michael R. Kodama

General Counsel
Matthew T. Summers

Ex-Officio
William Rawlings
City Manager Representative

Eco-Rapid Transit acknowledges the efforts of Metro and its team and is in full support of the development of the West Santa Ana Branch light rail transit project, developed with appropriate mitigations and with a preference for the Artesia to Union Station alignment and a station in Little Tokyo (Alternative 1, Design Option 2).

We appreciate having an opportunity to comment on the Draft WSAB EIR EIS and will continue to work with staff on the design, construction and mitigation of this project. We look forward to riding on the West Santa Ana Branch light rail line. If you have any questions, you can contact our Executive Director, Michael Kodama at mkodama@eco-rapid.org.

Sincerely,

Ali Sajjad Taj
Chair, Eco-Rapid Transit

cc: Eco-Rapid Transit Board of Directors
Gateway Cities COG Council of Governments
Los Angeles County Metropolitan Transportation Authority Board of Directors

City of South Gate – CC-5

Comment ID	Response
CC-5-1	The comment submission has been reviewed and considered during preparation of the Final EIS/EIR.
CC-5-2	See response CR-GEN-1 regarding identification of the Locally Preferred Alternative (LPA) and study of a future extension to LA Union Station, inclusive of a station in Little Tokyo.
CC-5-3	Refer to response CR-FIN-1.
CC-5-4	Figure 1-1 in Chapter 1, Section 1.2.2 has been revised and text updated in the Final EIS/EIR to clarify jurisdictions within the study area. A label for the City of Long Beach has been added, and the label for the City of Hawaiian Gardens has been corrected.
CC-5-5	Figure 1-4 in Chapter 1, Section 1.4 of the Final EIS/EIR has been updated to include South Gate as an "Employment Center." Chapter 4, Figures 4.1-1 through Figure 4.1-4 in Section 4.1.2 of the Draft EIS/EIR provides the generalized land uses within the land use affected area. The purpose of Section 1.3 of the Draft EIS/EIR is to provide an overall description of the 98-square-mile WSAB corridor Study Area that extends over 20 miles from downtown Los Angeles to the City of Artesia. The narrative in Section 1.3.2 provides a general summary of the types of activity sites within the Study Area, including employment centers, and was not the basis for the analysis within each environmental topic included in Chapter 4 of the Draft EIS/EIR. Affected areas were identified for each environmental topic to analyze direct impacts that may occur as a result of the physical construction and operation of the Project and are discussed in each methodology section for each topic and summarized in Table 4.0.1 in Chapter 4 of the Draft EIS/EIR.
CC-5-6	Chapter 1 in the Draft EIS/EIR establishes the Purpose and Need for the Project and provides information on the corridor. The information in this chapter is meant to provide context to the Purpose and Need of the Project and the project corridor. It is not meant to establish the study area for the impact analyses. Chapter 3, Table 3.4 of the Final EIS/EIR and Table 4.1 in Section 4.2.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (previously Appendix D of the Draft EIS/EIR) were updated to include Firestone Boulevard as a key arterial in the City of South Gate. The analysis of impacts was not completed for roadway segments, but for individual intersections, so the inclusion or exclusion of arterials from these tables did not affect the impact analysis. The traffic analysis methodology is summarized in Chapter 3, Section 3.2 of the Draft EIS/EIR, and one of the focus areas is on intersection analysis. The specific intersections selected for the traffic analysis considered proximity to at-grade crossings where intersections could experience delay due to gate down times; changes to the roadway network; increase in traffic due to vehicles accessing or departing park-and-ride facilities; and traffic volumes at each intersection. The intersections requested in this comment were reviewed to determine if they meet the thresholds for inclusion in the traffic analysis. The LPA will not increase vehicular trips at any of these intersections by 50 vehicles or more and, therefore, they were not added to the impact analysis or to Table 3.5 which lists the intersections evaluated.

Comment ID	Response
CC-5-7	Figure 4.4-4 in Chapter 4, Section 4.4 of the Draft EIS/EIR depicts the change in visual character and quality at the proposed southwesterly driveway to the Firestone Station surface parking lot. The proposed aerial structure at the Firestone Station looking east from Atlantic Avenue is depicted in this figure. In addition to this figure, the visual impacts associated with the aerial structures are discussed under "Aerial Structures" in Table 4.4.4 in Chapter 4, Section 4.4.3.2 of the Draft EIS/EIR. The discussion of aerial structures in this table has a subheading, "Ardine Street to Rayo Ave (including Firestone Station) and Meadow Dr to South Gate/Downey City Boundary" that specifically discusses how the aerial structures will affect visual character, viewer sensitivity, and visual quality in the City of South Gate. Additional text has been added to this subheading in Table 4.4.4 in Chapter 4, Section 4.4.3.2 of the Final EIS/EIR to further specify that the discussion under this subheading pertains to the City of South Gate. The bridge structure over the Rio Hondo channel is discussed under "Bridges" in Table 4.4.4 in Section 4.4.3.2 of the Draft EIS/EIR. Additional text has been added to Table 4.4.4 of the Final EIS/EIR to specify that the discussion of the bridge structure in this location pertains to the City of South Gate. The bridge structure over the Los Angeles River is discussed under "Bridges" in Table 4.4.7 in Section 4.4.3.2 of the Draft EIS/EIR. Additional text has been added to Table 4.4.4 in the Final EIS/EIR to specify that the discussion of the bridge structure in this location pertains to the City of South Gate. As discussed in Tables 4.4.4 and 4.4.7 in the Draft EIS/EIR, the aerial and bridge structures in the City of South Gate are not expected to degrade the visual character of the Affected Area. As stated in Section 4.4.3.2 of the Draft EIS/EIR, the project components will fit the urban context, will be consistent with the scale and massing of the surrounding structures, and will be visually compatible with the visual character of the Affected Area. Additionally, as discussed in Table 4.4.4 of the Draft EIS/EIR for the aerial structure between Ardine Street to Rayo Avenue and Meadow to South Gate/Downey city boundary, the scale of the aerial structure will be consistent with the surrounding low-rise commercial and industrial structures. Where rail right-of-way faces a street right-of-way, the aerial structure will be visible in the foreground but will not detract from character and quality of landscape unit due to the industrial character of the Affected Area. Viewer groups will have little to no reaction to visual change as the aerial structure is in an industrial area. The aerial structure will not change the industrial character and quality of the Affected Area. As discussed under "Bridges" in Table 4.4.4 and Table 4.4.7 of the Draft EIS/EIR, although the scale and massing of the bridges over the Rio Hondo channel and Los Angeles River will be larger than the existing bridges, the bridges will be located at the flood-control channels and will be compatible and fit with the visual character and context of the concrete-lined flood-control channels. As discussed in Tables 4.4.4 and Table 4.4.7, while the bridges will be visible, viewer groups (motorists on nearby streets) will have little to no reaction to the bridges since views of the bridges are fleeting and viewers' attention and focus are on the road. The proposed bridges will not degrade the overall visual character and quality of the Affected Area. Potential noise impacts in the City of South Gate are identified in Chapter 4, Figure 4.7-7 and Figure 4.7-8 of the Draft EIS/EIR. Graphically, the areas where the light rail will be at-grade versus aerial are symbolized in the legend. The profile of the light rail was considered as part of the noise analysis. In particular, the noise analysis included adjustments for areas where the light rail will be on an aerial structure. Refer to the response to CC-5-41 for additional information regarding the noise analysis in South Gate. See Common Response CR-NOI-1 regarding guidance used for the noise impacts analysis and proposed mitigation measures to reduce noise levels during construction and operational activities.

Comment ID	Response
CC-5-8	The Firestone Station concept shown in Figure 2-14 in Chapter 2 of the Draft EIS/EIR illustrates the at-grade parking, aerial station, and station access for the Project at the Firestone Station. Stairs escalators, and elevators will be provided from the ground level to the platform level. Design drawings with additional detail for the station, including access, were included in Appendix B of the Draft EIS/EIR. Station plans were presented and discussed with the City of South Gate during an April 13, 2023, meeting.
CC-5-9	See response CR-SAF-4 regarding pedestrian and bicyclist safety. As stated in Chapter 2, Section 2.5.2 of the Draft EIS/EIR, bike hubs are proposed at station locations near bikeways based on demand and may include bicycle racks, lockers, secure bike parking, and on-call mechanics. Additionally, Metro will continue to coordinate with local jurisdictions regarding First/Last Mile (FLM) improvements, including pedestrian and bicycle connections, in accordance with the Metro First/Last Mile Guidelines. Improvements are focused on specific pedestrian connections within 0.5 mile of stations and connections to bike networks within 3 miles of stations in coordination with cities and key stakeholders. Cities are responsible for advancing the design, environmental clearance (if needed), construction, and maintenance of these connections. The FLM plan will be adopted by the Metro Board in parallel with the Final EIR certification and Federal Transit Administration (FTA) Record of Decision for the Project.
CC-5-10	The I-105/C Line Station concept shown in Figure 2-16 in Chapter 2 of the Draft EIS/EIR illustrates the parking and station access for WSAB at the I-105/C Line Station. Design drawings with additional detail for the station, including access, were included in Appendix B of the Draft EIS/EIR. Design plans for the C Line infill station were also included in Appendix B of the Draft EIS/EIR. Since circulation of the Draft EIS/EIR, the park-and-ride facility proposed for the I-105/C Line Station was reconfigured. Specifically, the dedicated transit parking on the west side of the freight tracks was removed and the parking facility on the east side of the freight tracks was expanded to the north. A new driveway to the facility was also added at Century Boulevard. The updated figure is included as Figure 2.14 in Chapter 2 of the Final EIS/EIR. Additionally, since circulation of the Draft EIS/EIR, Façade Avenue has been modified to an emergency exit only from the I-105/C Line infill station (rather than a station entrance and exit). It should be noted that the demolition and reconstruction of the Façade Avenue and Arthur Avenue bridges identified in the Draft EIS/EIR are no longer required to accommodate the Project. FTA construction noise standards include nighttime standards. Mitigation Measure NOI-8 (Noise Control Plan) in the Draft EIS/EIR requires Metro to develop a noise control plan that will demonstrate how noise criteria will be achieved during construction, and will comply with local noise ordinances (this measure is referred to as Mitigation Measure NOI-6 [Noise Control Plan] in the Final EIS/EIR). If nighttime construction is planned, a noise variance may be prepared. Refer to Chapter 4, Section 4.19.3.7 of the Draft EIS/EIR for the construction-related noise analysis and mitigation measure. Safety and security at all proposed WSAB stations will be consistent with the approaches used throughout the Metro system. Metro will follow Metro station design guidelines.

Comment ID	Response
CC-5-11	Since circulation of the Draft EIS/EIR, the I-105 ExpressLanes Project received design exceptions for outside shoulders along I-105. As a result, the existing Façade Avenue street bridge and Arthur Avenue pedestrian bridge will no longer need to be demolished and reconstructed as part of the WSAB Project. Additionally, access to and from the I-105/C Line infill station will be via the new light rail transit bridge and pedestrian walkway built next to the tracks. The access point at Façade Avenue has been modified to accommodate emergency egress only and will include an emergency egress gate, stairs, and elevators for emergency use only. Metro Systemwide Station Design guidelines specific to safety and security include guidance on sightlines to station stairs/elevators. Pedestrian bridges will be well lit and will provide a safe crossing for pedestrians and bicyclists. See responses CR-SAF-1 regarding safety and security and CR-SAF-3 regarding security patrols and enforcement.
CC-5-12	In coordination with the City of South Gate, the I-105/C Line Station parking facility has been reconfigured by removing dedicated transit parking on the west side of the freight tracks and expanding the parking facility on the east side of the freight tracks to the north. A new driveway at Century Boulevard has also been added. The revised parking design and additional driveway are included in the Final EIS/EIR. These project refinements will not result in any new or substantially more significant impact than identified in the Draft EIS/EIR. See response CR-TRA-1 regarding spillover parking.
CC-5-13	See response CR-TRA-1 regarding additional transit parking and the spillover parking analysis.
CC-5-14	Chapter 3, Section 3.3.6 of the Final EIS/EIR has been revised to include the Gardendale Avenue Class II bike lane on the Major Class II Bikeways list. Additionally, Chapter 4, Section 4.4 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* has been revised to include the Gardendale Avenue Class II bike lane to the list of Major Class II Bikeways list. Similar to the Draft EIS/EIR, the bike lane will be maintained along Gardendale Avenue with implementation of the Project, and environmental conclusions are unchanged.

Comment ID	Response
CC-5-15	Chapter 2, Section 2.5.2.7 and Chapter 3, Section 3.7.2 of the Final EIS/EIR include updated information on the construction schedule for the Project. While the Draft and Final EIS/EIR provide general construction durations based on Project goals and milestones, it is not possible at this phase of the Project's planning process to develop a detailed construction schedule. The specific construction schedule will be informed by such factors as the availability of the construction contractor(s) workforce, equipment, and materials, value engineering, and stakeholder coordination. Specific information on timing will be determined by Metro and the construction contractor(s) prior to the start of construction, taking into account these and other related factors. Impacts will be in compliance with the Final EIS/EIR. Many of the project measures and mitigation measures in the Draft EIS/EIR are applicable to the Project during construction and are not necessarily location specific. For example, Mitigation Measure TRA-18 (Transportation Management Plan) (identified as Mitigation Measure TRA-20 in the Draft EIS/EIR) requires the development of a plan to address construction impacts on transportation facilities throughout the project corridor, Mitigation Measure NOI-6 (Noise Control Plan) (referred to as Mitigation Measure NOI-8 in the Draft EIS/EIR) requires the development of a plan to demonstrate how noise criteria will be achieved during construction throughout the project corridor, and Mitigation Measure COM-1 (Construction Outreach Plan) requires the development of a plan to mitigate construction impacts to affected communities and businesses along the project corridor. These mitigation measures apply over a large area and apply to areas affected by construction of the LPA. However, the Draft EIS/EIR concluded that for Alternative 3 (identified as the LPA, or Project), adverse and unmitigated impacts could still occur for certain topics, including traffic and noise during construction. During construction of the Project, Metro and the construction contractor will coordinate with all applicable jurisdictional agencies. The development of the Transportation Management Plan (Mitigation Measure TRA-18) will begin during the next design phase of the Project with input from the jurisdictional agencies, and the plan will be implemented during construction.
CC-5-16	See response CR-TRA-1 regarding additional transit parking and the spillover parking analysis. The spillover parking analysis has been updated in the Final EIS/EIR to include stations that do not provide transit parking, including the Gardendale Station. Table 3.19 in Chapter 3, Section 3.4.4 of the Final EIS/EIR notes that the projected 2042 transit parking demand at the Gardendale Station is 200 spaces. At stations where transit parking is not provided, it is assumed that demand will shift to the stations with transit parking. The Firestone Station and I-105/C Line station, nearest to the Gardendale Station, are projected to have excess parking supply. With implementation of Mitigation Measure TRA-20 (Parking Mitigation Program [Permanent]) in the Final EIS/EIR (referred to as Mitigation Measure TRA-22 in Chapter 3, Section 3.5.2.4 of the Draft EIS/EIR), Metro will coordinate with local jurisdictions to address the physical loss of public parking spaces resulting from implementation of the LPA. Strategies could include, but not be limited to, restriping the existing street to allow for diagonal parking, reducing the number of restricted parking areas, and adjusting the time limits for on-street parking. Mitigation Measure TRA-20 has been updated in the Final EIS/EIR to include utilizing remnants of parcels acquired for off-street parking as an additional strategy that could be considered. Mitigation Measure TRA-19 (Parking Monitoring and Community Outreach) in the Final EIS/EIR (referred to as Mitigation Measure TRA-21 in the Draft EIS/EIR), requires Metro to complete surveys within 0.5 mile of all WSAB stations prior to and after project opening. Metro will coordinate with the City as applicable based on the results of those surveys.
CC-5-17	See response CR-TRA-1 regarding the spillover parking analysis which has been updated in the Final EIS/EIR and response to comment CC-5-16.

Comment ID	Response
CC-5-18	Additional on-street parking surveys were conducted on select streets near the Firestone Station and Gardendale Station (e.g., Salt Lake Avenue, Ardine Street, Gardendale Street, Monroe Avenue, Center Street and Industrial Avenue) during non-holiday weekdays in March and May 2023 on Tuesdays, Wednesdays, and Thursdays between the hours of 6:30 a.m. and 8:30 a.m., 10:00 a.m. and 12:00 p.m., and 11:00 a.m. and 2:00 p.m. The survey time periods were determined based on the surrounding land uses and considered parking restrictions in each neighborhood. The results of the parking surveys are presented in Chapter 3, Section 3.3.7 of the Final EIS/EIR and Section 4.5.1 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report*. A visual survey map is included in Appendix A of the report.
CC-5-19	The streets mentioned in the comment were included in the construction analysis. Specifically, Table 3.51 in Chapter 3 of the Draft EIS/EIR identifies the construction impacts to these roads, which include lane-width reductions to accommodate construction of a modified median and grade separation column, with intermittent full-road closures typically during the night.
CC-5-20	See responses to comments CC-5-12, CC-5-13, and CC-5-16.

Comment ID	Response
CC-5-21	The Land Use Consistency analysis in Chapter 4, Section 4.1.3 of the Draft EIS/EIR discusses project consistency with applicable land use plans and their objectives, goals, and policies. The Draft EIS/EIR concluded that the Project will be consistent with applicable goals, objectives, and policies related to alternative transportation, public transportation, and future growth in transit identified in the general plans, community plans, specific plans, master plans, and bicycle master plans of the affected local jurisdictions. As stated in response to comment CC-5-10, parking at the I-105/C Line Station has been modified since the Draft EIS/EIR. Based on the project refinements and updated analysis in the Final EIS/EIR, the LPA will permanently affect approximately 56 parcels in the City of South Gate; 15 permanent full acquisitions and 53 permanent partial acquisitions are required to support the LPA. Approximately 19 businesses will be permanently affected by the LPA. Construction activities will temporarily affect approximately 60 parcels in the City of South Gate; 10 full acquisitions and 62 temporary construction easements are required for construction laydown, construction easements, and temporary pedestrian access. Approximately 4 parcels in the City of South Gate will be permanently affected to accommodate the I-105/C Line Station and associated parking facility. These parcels will require a full acquisition and will also be used for construction laydown. It should be noted that "parcels" is not a total sum of the full and partial acquisitions. More than one partial acquisition may occur on a single parcel. The updated analysis is included in the *West Santa Ana Branch Transit Corridor Project Final Displacements and Acquisitions Impact Analysis Report* (previously Appendix H to the Draft EIS/EIR) and summarized in Section 4.3 of the Final EIS/EIR. Discussion about displacements is provided in Section 4.3, and impacts to the surrounding community as it relates to displacements is provided in Section 4.2 in Chapter 4 of the Draft EIS/EIR. Section 4.2.3.2 under the subheading "Acquisition and Displacement" in the Draft EIS/EIR discussed impacts to communities as a result of property acquisitions. The Draft EIS/EIR concluded that the acquisition of commercial and residential properties may result in the displacement of several businesses and residents. However, these acquisitions and displacements will not affect the overall function of community assets or adjacent and surrounding uses, and no community assets will be displaced. Residential neighborhoods and community assets will not be isolated, and residential neighborhoods and community assets will be maintained. The Project refinements do not alter this conclusion, and new adverse effects will not occur because the Project will comply with the Uniform Act and California Relocation Act. See responses CR-DIS-1 and CR-DIS-2 regarding compliance with the Uniform Act and California Relocation Act and updates to the acquisition and displacement data for the LPA.
CC-5-22	Analysis at the I-105/C Line Station included evaluation of potential impacts in the vicinity of the station related to the at-grade crossing and station access. Consistent with the traffic analysis approach, intersection analysis was conducted at 8 intersections: Intersections 68 to 75 (see Table 3.14 in Chapter 3 of the Draft EIS/EIR). Impacts and potential mitigations were assessed. Intersections 68 (Gardendale Street/Center Street) and 70 (Gardendale Street/Industrial Street) were identified as having adverse effects; feasible mitigation measures were identified. These mitigation measures are identified as TRA-13 (Gardendale Street/Center Street) and TRA-14 (Gardendale Street/Industrial Avenue) in Chapter 3, Section 3.5.2.1 of the Draft EIS/EIR (referred to as TRA-11 and TRA-12 in the Final EIS/EIR). With implementation of Mitigation Measures TRA-13 and TRA-14, adverse impacts at these intersections will not occur.

Comment ID	Response
CC-5-23	See responses CR-SAF-1 regarding safety and security and CR-SAF-3 regarding security patrols and enforcement, as well as responses to comments CC-5-10 and CC-5-11. Per Section 6 of the Metro Rail Design Criteria (MRDC), stairs, elevators and escalators will be situated to carry passengers directly to the platform at a location convenient for boarding their particular train. These vertical elements will be strategically located at all levels to make this direct route possible. The capacity of these vertical elements at each station will be designed to meet the anticipated passenger demand at each station. In addition, the stairs and escalations will be well-lit per illumination identified in the MRDC. Safety and security at all proposed WSAB stations will be consistent with the approaches used throughout the Metro system. The LPA will be designed to include security features such as lighting, surveillance, CCTV, access control, and emergency call boxes to reduce the potential for crime, and stations will be consistent with Metro's Systemwide Station Design Standards, which include safety and security guidance. Guidelines specific to safety and security include guidance on sightlines to station stairs/elevators.
CC-5-24	Refer to response CR-SAF-4 regarding motorist safety. The modifications to intersection turning movements and prohibitions around the I-105/C Line Station requested in the comment are not considered as mitigation strategies for traffic impacts, primarily because most of them could increase delay. Chapter 5, Section 5.3.2 of the *West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report* (Appendix D of the Draft EIS/EIR) addresses active transportation impacts, with a focus on where bicycle and pedestrian facilities will be removed or relocated. The impact analysis did not find the potential for increased traffic in the vicinity of the stations to result in negative effects to bicycle and pedestrian traffic. The Main/Garfield and Garfield/Century intersections were not analyzed in the Draft EIS/EIR because the Project will not add 50 or more trips to those intersections, which was a threshold for inclusion in the traffic analysis; see the response to comment CC-5-6 regarding the traffic methodology. The traffic analysis did include select intersections along the segments of Paramount, Garfield, Gardendale, and Century noted in the comment. The intersections included in the traffic analysis are shown in Chapter 3, Table 3.14 of the Draft EIS/EIR. The criteria for selecting intersections are also described in the response to comment CC-5-6. For those intersections where adverse effects were identified, mitigation measures were identified. Turning restrictions (which often have secondary effects) were not needed to address those effects. Refer also to the response to CC-5-22 regarding mitigation identified within the City of South Gate. In coordination with the City of South Gate after circulation of the Draft EIS/EIR, an additional driveway at Century Boulevard was added to the I-105/C Line Station park-and-ride facility. This driveway is included in the Final EIS/EIR. This project refinement was included in the analysis in the Final EIS/EIR and does not alter the environmental conclusions of the Draft EIS/EIR.
CC-5-25	Consistent with Metro standard practice and as discussed with the city, Metro will consider repaving streets if they were used for haul routes during construction and the pavement deteriorates as a result of construction vehicles. During operation of the LPA, additional traffic accessing the station will largely be automobiles, which will have a minimal impact on pavement life.

Comment ID	Response
CC-5-26	See response to comment CC-5-12 regarding parking. Metro will coordinate with the City on parking management as applicable based on the result of the surveys conducted per Mitigation Measure TRA-19 (Parking Monitoring and Community Outreach) in the Final EIS/EIR, referred to as Mitigation Measure TRA-21 in the Draft EIS/EIR.
CC-5-27	The LPA does not involve reconstructing Century Boulevard from the Los Angeles River Bike Trail to the I-105/C Line Station. Modifications along Century Boulevard will specifically focus on the area that will be affected by the LPA, such as the area within approximately one block east and west of the alignment. The LPA will include a wide range of features to enhance active transportation facilities for the benefit of users, including physical improvements (e.g., barriers and gates), channelization and signing, illumination, and other design improvements that will enhance user experience and security. Improvements on Century Boulevard that are not associated with the LPA are outside the scope of the Project.
CC-5-28	Prior to opening a new rail transit line, Metro completes a bus-rail interface study. As part of this study, Metro coordinates with other jurisdictions and transit service providers to determine if adjustments are needed to existing or planned bus routes to align with the service provided by the new rail transit line. This study occurs closer to opening in order to ensure that adjustments to bus services reflect the population, employment, and ridership demand in the service area. Preparing that study at this time would be speculative, particularly in light of the lingering effects of the COVID-19 pandemic. Future changes or additions to bus service would follow the requirements of the applicable agency prior to implementation. Therefore, due to the speculative nature of future bus operation needs, the specifications of the bus bays, including the precise location and number of bus bays, will need to be further determined and evaluated during future stages of the design, prior to opening.
CC-5-29	The traffic analysis of the Azalea/Atlantic intersection (No. 62) indicated that the Project will not result in adverse effects. The intersection will operate at level of service (LOS) B in both peak periods with the Project in the 2042 horizon year (see Table 3.14 in Chapter 3 of the Draft EIS/EIR). There is no parking facility proposed along Firestone Boulevard. The dedicated transit parking will be located east of Atlantic Avenue and south of Patata Street/Salt Lake Avenue. Under existing conditions there are no bus stops immediately adjacent to the station parking. Refer to response to comment CC-5-28 regarding the bus-rail interface study.

Comment ID	Response
CC-5-30	The northerly driveway along Atlantic Avenue will be a right in and right out. Southbound left turns will not be accommodated due to the raised median. The Atlantic/Firestone intersection was analyzed in the Draft EIS/EIR to determine if the Project will result in adverse impacts on traffic. While this intersection (No. 63) will operate at LOS F in both peak periods with the Project in 2042, the increases in delay (1.2 seconds in the AM peak and 1.6 seconds in the PM peak) do not meet the criteria for adverse effects (see Chapter 3, Table 3.14 of the Draft EIS/EIR for LOS and delay and Section 3.2.1 for the thresholds established to identify adverse effects). The changes in delay will result from vehicles accessing the station; the WSAB tracks will be grade-separated on both Atlantic Avenue and Firestone Boulevard. The light rail transit (LRT) will cross Firestone Boulevard on an elevated structure and the Project will not change the operation or frequency of freight. Based on the information provided below, a new access point is not needed as mitigation because impacts at the Atlantic/Azalea intersection spilling back to the freight tracks are not anticipated. The Atlantic/Salt Lake Avenue intersection (No. 61) was analyzed in the Draft EIS/EIR to determine if the Project will result in adverse effects on traffic. This intersection will operate at LOS D/F in the AM/PM peak periods, respectively, with operation of the Project. The increases in delay (1.8 seconds in the AM peak and 0.5 second in the PM peak) do not meet the criteria for adverse effects (see Table 3.14 of the Draft EIS/EIR for LOS and delay and Section 3.2.1 for the thresholds established to identify adverse effects). The changes in delay will result from vehicles accessing the station; the WSAB tracks will be grade-separated on both Atlantic Avenue and Firestone Boulevard.
CC-5-31	The cumulative analysis presented in the Draft EIS/EIR follows the methodology prescribed by the California Environmental Quality Act Guidelines Section 15130 that states that the cumulative impacts can be based on a "summary of projections contained in an adopted local, regional, or statewide plan, or related planning document that describes or evaluates conditions contributing to the cumulative effect." This projection assumed in the Southern California Association of Governments (SCAG) 2016-2020 Regional Transportation Plan/Sustainable Communities Strategy includes changes in jurisdictions within the project study area that are expected to take the form of new development, expansion of existing development, redevelopment/demolition, and intensification of land use densities. Although the potential development proposed at 4959 Patata Street and 5037 Patata Street, as referenced by the commentor, is not specifically listed in the Draft EIS/EIR, projected growth in the City of South Gate and the SCAG region are considered in the cumulative analysis. Discussed in detail in Chapter 4, Section 4.21.2.2 of the Draft EIS/EIR, "...in most of the corridor jurisdictions, these changes have been anticipated and are incorporated into local planning processes, including the initiation and/or adoption of specific plans or transit-oriented communities anticipating the Project among other changes."
CC-5-32	All four intersections cited in the comment were analyzed to determine if the Project will result in traffic impacts (see Table 3.14 of the Draft EIS/EIR [intersection Nos. 61, 62, 63, and 64]). The Synchro model was coded based on existing signal timing plans that show coordination between these four intersections. No adverse effects were identified as compared to the No Build Alternative (2042). Potential modifications to the traffic signal coordination system will be addressed as the design advances. Per the Master Cooperative Agreement, design plans will be provided to the City for review.

Comment ID	Response
CC-5-33	As stated in Chapter 3, Section 3.7.1, and Chapter 4, Section 4.19.2.6 of the Draft EIS/EIR, construction of the WSAB stations will involve installation of station furnishings, including canopies, railings, lighting, seating, signage, artwork, bike racks, and fare vending equipment. Station amenities will be consistent with Metro's Systemwide Station Design Standards, which provides guidance on the design of station furnishings, and other station amenities. As stated in Chapter 2, Section 2.5.2 of the Draft EIS/EIR, bike hubs are proposed at station locations near bikeways based on demand and may include bicycle racks, lockers, secure bike parking, and on-call mechanics.
CC-5-34	While the Gardendale/Center intersection will be modified to a signalized intersection, the Gardendale/Dakota intersection will not be a signalized pedestrian crossing, so no signal coordination is needed. Project Measure TR PM-1 (Pre-signals and Queue-cutter Signals) provides that the Project will install pre-signals and queue-cutter signal accordingly to discourage vehicles from stopping on the tracks. See Plan Sheet CS-207 in Appendix B for the grade crossing drawing at this location. A pre-signal will be provided at this location.
CC-5-35	Refer to the response to comment CC-5-21 regarding acquisitions in the City of South Gate, including for the I-105/C Line Station and park-and-ride facility. Generally, the properties located along Mason Street are identified as full acquisitions if the structure is affected. The parking lot at the corner of Imperial Highway and Garfield Place is no longer proposed as a construction laydown area. A minor acquisition will still be required for grade crossing modifications, but the parking lot will remain. Metro will coordinate with the City of South Gate per an executed Master Cooperative Agreement, which will provide the City of South Gate with the opportunity to review design packages and provide comments. Additionally, Metro has provided and continues to provide extensive coordination with the City of South Gate as it relates to project design.
CC-5-36	The Project will require modifications to the access road and sidewalks to the west of the new development at the 10920 Garfield Avenue property (APN 6234-005-014) to accommodate an at-grade crossing. The structure on the property will not be affected and relocation is not anticipated. Coordination in support of property acquisitions will begin after the Record of Decision is issued for the Project. Regarding potential noise and vibration impacts, the residential property is included in the Final EIS/EIR as noise clusters N369 to N376 and vibration cluster V235. Noise measurements were conducted at the subject property and transit noise levels were predicted to potentially result in moderate and severe impacts without mitigation. An 8-foot soundwall will be implemented along the aerial structure and retained fill to mitigate noise impacts. The soundwall will reduce noise levels to below the FTA noise impact criteria and no noise impacts will remain. Vibration levels were determined to be below the FTA vibration impact criteria and no impact will occur.
CC-5-37	To the extent possible, the Project has been, and will continue to be, designed to avoid conflicts with existing major utilities. However, relocation, modification, or protection of utilities in place may still be required. The Project includes construction of new utility facilities as needed to support operation of the Project (e.g., connection of traction power substations to the electricity substations). Upsizing of facilities beyond that needed for the Project would be considered a betterment and is not part of the Purpose and Need of the Project.
CC-5-38	See response to comment CC-5-16.

Comment ID	Response
CC-5-39	The particulate matter emissions presented in Chapter 4 of the Draft EIS/EIR included vehicle exhaust emissions, brake wear emissions, tire wear emissions, and resuspended road dust emissions. The average vehicle exhaust emissions will be reduced in the future through fleet turnover and newer vehicles meeting more stringent emissions standards. The brake wear, tire wear, and resuspended dust emissions do not decrease in future years on an average per-vehicle basis, and collectively those emissions make up over 95 percent of the particulate matter emissions from on-road regional vehicle miles traveled (VMT) presented in the Draft EIS/EIR. Therefore, the increase in regional VMT produces a proportionate increase in emissions of these dust sources that more than offsets the decrease in exhaust emissions from improved fuel efficiency and emissions standards. Indirect air pollutant emissions associated with electric-generating facility operations are not included in the air quality analysis for the Project because those emissions are regulated through permitting programs administered by the South Coast Air Quality Management District (SCAQMD) or another appropriate permitting agency outside of the SCAQMD boundary. Those emissions have already been accounted for in the regional emissions inventory, and the Project will not require the expansion of existing production levels to meet demand. However, it is customary to account for all direct and indirect sources of emissions for the greenhouse gas (GHG) emissions assessment; therefore, the off-site electricity generation emissions are included in the GHG emissions analysis.
CC-5-40	The Draft EIS/EIR accounted for indirect GHG emissions resulting from electricity generated to power the light rail vehicles. A detailed analysis of the total electricity needed to power the transit line was not available when the emissions analysis was completed for the Draft EIS/EIR. However, as noted in the GHG emissions analysis, Metro has prepared studies and emission inventories that quantify the amount of electricity needed to power a light rail line based on revenue miles traveled for the line. Annual Metro rail revenue miles traveled, and the associated electricity consumption, were used to estimate an average per-revenue-mile consumption factor for Metro rail propulsion in the analysis. Table 4.6.2 in Chapter 4, Section 4.6 of the Draft EIS/EIR presents the annual LRT revenue miles that would occur with implementation of the Build Alternatives. The GHG emissions analysis focused on estimated GHG emissions rather than presenting the energy consumption associated with operation of the LRT corridor. Disclosing the annual electricity consumption would have been an intermediate step that would not have altered the GHG emissions analysis. The calculated electrical consumption factor can be found in the *West Santa Ana Branch Transit Corridor Project Final Greenhouse Gas Emissions Impact Analysis Report* (Appendix K to the Draft EIS/EIR). Underlying calculations determined that LRT corridor operations would produce 6.75 pounds of carbon dioxide equivalents (6.75 lbCO2e) per LRT mile traveled. The analysis has been updated for the Final EIS/EIR using CalEEMod Version 2020.4.0 (CAPCOA 2021) and the EMFAC2021 mobile source emissions model. The updated results are included in Chapter 4, Section 4.6 of the Final EIS/EIR. Impact conclusions remain unchanged from the Draft EIS/EIR.

Comment ID	Response
CC-5-41	The noise analysis was conducted consistent with FTA guidelines, which include grouping similar sensitive receivers (such as a group of single-family residences) into clusters. The results of the analysis are applied to the cluster as a whole, as they are representative of what will be experienced in that area. Figures 4.7-5 through Figure 4.7-11 in Section 4.7.4 of the Draft EIS/EIR identify locations of LRT noise impacts remaining after mitigation and soundwall locations. Soundwalls are also illustrated in the LRT plan set included in Appendix B of the Draft and Final EIS/EIR. Mitigation Measure NOI-1 notes the approximate location of soundwalls by street as well. There will be no breaks in the soundwall except for at-grade crossings where traffic and pedestrian access must be maintained or where there is no noise impact to adjacent receivers. Additional figures are included in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR), which provides a detailed look at each segment. Mitigation Measure NOI-4 (Crossing Signal Bells) has been recommended for at-grade crossings with residual impacts, but conservatively the associated reduction was not accounted for in the Draft EIS/EIR analysis as this mitigation measure requires additional approval before being implemented. Based on Metro's experience successfully implementing bell shrouds on other transit lines and coordination with the California Public Utilities Commission (CPUC) subsequent to circulation of the Draft EIS/EIR, NOI-4 (Crossing Signal Bells) has now been incorporated as Project measure (NOI PM-1) within the Final EIS/EIR and the associated reduction is included in the analysis. Field testing of bell shrouds implemented on existing Metro LRT systems has shown bell shrouds are effective at keeping crossing signal noise at the at-grade crossing. As shown in Chapter 2, Table 2.6 of the Draft EIS/EIR, headways along the WSAB alignment will be reduced late at night and in the early morning periods resulting in reduced occurrences of crossing signal noise. Project Measures NOI PM-1 (Crossing Signal Bell Shrouds) and NOI PM-2 (Gate-Down-Bell-Stop Variance) remain subject to CPUC approval. Regarding freight trains, Metro is coordinating with the Union Pacific Railroad to reduce noise where Metro has substantially relocated existing freight tracks. Mitigation Measure NOI-5 (Freight Track Relocation Soundwalls) in the Final EIS/EIR includes a provision for soundwalls specific to freight train noise. This measure was previously referred to as Mitigation Measure NOI-7 in the Draft EIS/EIR. The establishment of Quiet Zones is applicable to freight rail and not light rail transit. Additional analysis has been prepared since the Draft EIS/EIR to identify possible additional noise reduction measures. The noise analysis in Section 4.7.3 and 4.7.4 of the Final EIS/EIR incorporates additional analysis completed since the Draft EIS/EIR to identify possible additional noise reductions. Corresponding edits have been made in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (previously Appendix M of the Draft EIS/EIR). Residual noise impacts have been reduced since the Draft EIS/EIR.

Comment ID	Response
CC-5-42	Construction-related impacts to geotechnical, subsurface, and seismic resources are discussed in Chapter 4, Section 4.19.3.9 of the Draft EIS/EIR. As stated in this section, potential impacts associated with construction will be minimized through compliance with the established design standards discussed in Section 4.9.1 of the Draft EIS/EIR. Adverse effects were not identified, and mitigation is not required. As part of Project Measure GEO PM-3 (Geotechnical Design [Construction]), a number of geotechnical design reports are required as design of the Project advances in accordance with the Metro Rail Design Criteria. The California Department of Transportation and the County of Los Angeles Building Code also have design requirements for bridges, aerial structures, and building structures. Geotechnical report recommendations will be incorporated into the project plans and specifications. The design reports will also provide recommendations to be implemented during construction. The construction recommendations will address temporary excavations, ground settlement and ground loss, and oil and gas hazards, and will include construction monitoring plans.

Comment ID	Response
CC-5-43	Table 4.12.4 in Chapter 4, Section 4.12 of the Draft EIS/EIR stated that implementation of Alternative 1 would reduce annual regional energy resource consumption by 626,621 MMBTU/year, that implementation of Alternative 2 would reduce consumption by 515,569 MMBTU/year, and that implementation of Alternative 3 would reduce consumption by 123,011 MMBTU/year. Alternative 3 was identified as the LPA. The Draft EIS/EIR analysis indicated that the total direct energy consumption for the LPA would be 10,664 MMBTU (LRT/Station Energy) + 7,652 MMBTU (MSF Operations) = 18,316 MMBTU. The indirect energy savings from the reduction in regional on-road vehicle travel resulting from increased transit ridership would be-141,307 MMBTU. Therefore, the annual energy savings represents approximately 770% of the direct energy consumption. The energy savings is 7.7 times the magnitude of the energy expenditure, for a net energy savings of 123,011 MMBTU. This amount of energy savings is substantial and reflects one aspect of the LPA's environmental benefit. CARB's EMission FACtor (EMFAC) on-road mobile source emissions inventory model is updated every few years to account for implementation of adopted regulations in future scenario years. However, the state goal established by ratification of the Advanced Clean Cars II rule that is referenced in the comment (Executive Order N-79-20) was promulgated in 2020 and therefore would not be reflected in the EMFAC regional vehicle fleet for scenario years prior to 2020. The EMFAC emission factors for on-road vehicles used in the Draft EIS/EIR analysis were produced from the EMFAC2017 iteration of the model and would not account for the statewide goal in the analysis year of 2042. The energy savings from on-road vehicle travel as described in Table 4.12.4 of the Draft EIS/EIR are likely conservative estimates in terms of reductions relative to existing conditions, given that future year petroleum fuels consumption would be reduced on average within the regional on-road vehicle fleet through implementation of the new rule. The analysis of energy resource consumption associated with the LPA was updated during preparation of the Final EIS/EIR. The updated analysis used the latest version of EMFAC available, which is EMFAC2021, to revise estimates of petroleum fuels consumption from on-road vehicles in the operational year of 2042. The EMFAC2021 software accounts for induced changes to the regional on-road vehicle fleet that will result from industry adjustment to Executive Order N-79-20. To note, because the requirement of having 100 percent of in-state sales of new passenger cars and trucks meeting zero-emission standards culminates in 2035, the EMFAC database assumes that market penetration of zero-emission vehicles will occur gradually and accelerate in future years as they become more commercially available. As described in Chapter 4, Section 4.12 of the Final EIS/EIR, using the EMFAC2021 fuel consumption factors, the net annual energy savings for the LPA will be 86,060 MMBTU/year. This reduction is smaller than the reduction described in the Draft EIS/EIR analysis in part because EMFAC2021 accounts for the market penetration of alternatively fueled and zero-emission vehicles spurred by EO N-79-20, which means that on average the vehicles will be using less petroleum transportation fuels on a per-mile basis in 2042 than if the rule had not been promulgated. Therefore, even after accounting for the fleetwide reduction in petroleum transportation fuels use resulting from EO N-79-20, the LPA energy savings from decreased on-road vehicle travel (157,520 MMBTU) will be much greater than the annual direct energy expenditure of the LPA (71,460 MMBTU). Implementation of the LPA will not interfere with statewide efforts to advance zero-emission vehicle technologies.

Comment ID	Response
CC-5-44	Chapter 4, Section 4.18.3.2 and Section 5.2.3 of the *West Santa Ana Branch Transit Corridor Project Final Safety and Security Impact Analysis Report* (previously Appendix F of the Draft EIS/EIR) have been updated to include evidence-based data supporting the design features. See response CR-SAF-4 regarding pedestrian and bicyclist safety at the at-grade portions of the Project. In addition, many of the at-grade locations will incorporate safety features that are identified by the Federal Highway Administration as Proven Safety Countermeasures, such as: ▪ Medians and pedestrian refuge islands (up to 56% reduction in pedestrian crashes) ▪ Flashing lights (up to 47% reduction in pedestrian crashes) These safety features are shown in the Final Advanced Conceptual Alignment Design Part 2 (Appendix B of the Draft and Final EIS/EIR). As discussed in Sections 4.18.3 and 4.19.3.18 of the Draft EIS/EIR, the Project will not result in adverse effects related to safety and security. Metro examines safe connections to the surrounding community as part of the First/Last Mile (FLM) plan. FLM planning efforts focus on specific pedestrian connections within 0.5 mile of stations and connections to bike networks within 3 miles of stations in coordination with cities and key stakeholders. See response CR-SAF-3 regarding security patrols and enforcement. Security on the WSAB line, including at stations, will be provided by Metro's law enforcement and its contractors.
CC-5-45	See responses to comments JPA-1-1 through JPA-1-171 submitted by Eco-Rapid Transit. These responses are included in Appendix D of the Final EIS/EIR.