

### 5.3 RESPONSES TO PUBLIC AGENCIES

#### Submission 21 Carlos Huizar, City of Torrance

21-1 The north arrow in Figure 2.3-13 has been revised and included in Section 4.3, Corrections and Additions, of the Final EIR. This revision does not change the conclusions of the Draft EIR. Figure 2.3-14 of the Draft EIR is labeled correctly and did not require revisions.

21-2 The City's opposition to a new pedestrian crossing on Hawthorne Boulevard to access the South Bay Galleria Station is noted. All comments have been shared with the Metro Board for their consideration. On May 23, 2024, the Metro Board of Directors selected the Hybrid Alternative, which travels along the Metro ROW for the entire length of the alignment, as the LPA. The LPA does not include a station along Hawthorne Boulevard. The selection of the LPA helps guide the next phase of design and study, but no final decision has been made. All alignment options and alternatives studied in the Draft EIR are still being considered. All comments on the Draft EIR have been provided to the Metro Board for consideration. See MR-1: Selection of Alternatives.

Both the Draft EIR and the 2023 Transportation Detail Report, which evaluates non-CEQA issues and was published concurrently with the Draft EIR, include consideration of the mid-block pedestrian crossing at the south end of the South Bay Galleria Station (Hawthorne Option). The mid-block pedestrian crossing is intended to provide safe, convenient pedestrian access to the station, particularly for residents approaching from the south and the neighborhood east of Hawthorne Boulevard, thereby supporting the project's goal of providing a viable alternative to continual growth in traffic volumes.

The project seeks to reduce the risk of unsafe crossing behavior by providing safe crossing locations as close to the station as possible. The proposed crossing would be signalized and would be located approximately 360 feet south of the existing signal at Hawthorne Boulevard and Artesia Boulevard. Without a signalized crossing at the south end of the station, transit passengers approaching the station from the south (near 177th Street) would be more likely to attempt to unsafely cross Hawthorne Boulevard because of the long distance (over 1,000 feet) between signalized crossings at Artesia Boulevard and 177th Street.

This is also supported by the analysis of vehicle-pedestrian collisions along the corridor, as shown in Figure 3.1-14 of the Draft EIR. For instance, in the segment of Hawthorne Boulevard between approximately 162nd Street and Artesia Boulevard (which has more crossings between 400 to 600 feet apart), there were far fewer collisions total than in a comparable distance from Artesia Boulevard south to 182nd Street (which has fewer crossings).

The mid-block pedestrian crossing was evaluated under the applicable CEQA transportation standards of significance, including consistency with local policies that support improved pedestrian mobility and safety (see Section 3.1-4.1 of the Draft EIR). As described in Section 3.1-1.2 of the Draft EIR and MR-11: Traffic Delay and Level-of-Service, traffic impacts as measured by delay, such as level-of-service (LOS) impacts, are no longer treated as environmental impacts under CEQA. Likewise, CEQA does not require an evaluation of parking capacity and demand. However, potential secondary effects such as parking demand and circulation changes in residential areas are discussed in the 2023 Transportation Detail Report. The mid-block signal would not "introduce new vehicle traffic"

as the signal is a pedestrian safety measure for accessing the station and would be comparable to the several mid-block pedestrian crossings found on Hawthorne Boulevard less than one mile north in the City of Lawndale. The 2023 Transportation Detail Report also found that approximately 20 on-street parking spaces would be lost in the center median of Hawthorne Boulevard between 162nd Street and 171st Street in the City of Lawndale to accommodate columns for the elevated structure.

Metro considered various options to ensure safe pedestrian access to the proposed South Bay Galleria Station in the center of Hawthorne Boulevard, including a pedestrian bridge. A pedestrian bridge was not pursued, however, for several reasons. First, the at-grade crossing with coordinated signals is expected to provide safe and efficient access without the need for elevated infrastructure. Moreover, constructing a pedestrian bridge instead of a signalized crossing could introduce additional challenges, as it would expand the project's footprint due to the support columns required for the bridge. This would likely necessitate acquiring additional private properties along Hawthorne Boulevard to accommodate the bridge structure and a ramp compliant with the Americans with Disabilities Act (ADA) for accessibility.

The comment also suggests that a pedestrian bridge would reduce parking impacts to adjacent residential streets and private parking lots. However, based on Metro's system experience, the majority of rail passengers do not drive to stations. Metro's published data from its annual On-Board Customer Satisfaction Surveys show that at nearly all stations, most riders access the train by walking, bicycling, or transferring from buses. Even at stations where parking is provided, most station parking is not fully utilized under normal circumstances. Thus, the proposed South Bay Galleria Station is expected to have a similar pattern of people accessing the station by foot, bicycle, or bus. Furthermore, owners of private parking facilities have the authority to control who parks in the spaces, determine any associated charges, and can contact enforcement if unauthorized vehicles are parked.

- 21-3 Regarding 177th Street: the 2023 Transportation Detail Report analyzes all anticipated changes in roadways and traffic patterns, inclusive of traffic rerouting that would result from the proposed mid-block crossing and median access modifications. For the proposed crossing associated with the Hawthorne Option, the northbound left-turn pocket on Hawthorne Boulevard approaching 177th Street would be reduced from two lanes to one. This change would be managed through a combination of increased storage space (lengthening the turn lane) and adjustments to signal timing and phasing to maintain acceptable traffic flow. Signal operations could be further adjusted as needed to respond to evolving traffic patterns and reduce the risk of queues exceeding available storage in between signal cycles.

The Metro ROW alignments, including the LPA, do not include modifications to the 177th Street/Hawthorne Boulevard intersection as the alignments would be located along the Metro ROW.

- 21-4 Regarding 179th Street: As discussed in Section 3.1-4.3 of the Draft EIR, under the Hawthorne Option, a new traffic signal is proposed at 179th Street to facilitate safe vehicle turns and pedestrian access, as the location is presently unsignalized. This improvement would help accommodate traffic that would otherwise make left turns at the existing unsignalized median opening at 180th Street, which would be closed under the Hawthorne Option. To support this change, the northbound left turn lane on Hawthorne Boulevard approaching 179th Street would be extended up to 230 feet. This added storage would help

prevent left-turning vehicles from spilling into through lanes, maintaining efficient traffic flow. The proposed signal would preserve access for local neighborhoods and businesses affected by the median closure. Signal warrant analysis would be provided for new signals in the next phase of engineering should the Hawthorne Option be approved by the Metro Board following certification of the Final EIR.

The Metro ROW alignments, including the LPA, do not include new signals along Hawthorne Boulevard as the alignments would be located along the Metro ROW.

- 21-5 Regarding 180th Street: The 2023 Transportation Detail Report, which evaluates non-CEQA issues and was published concurrently with the Draft EIR, analyzes the potential effects of the proposed median gap closure at 180th Street, including the anticipated diversion of northbound left-turn volumes to 179th Street. The Hawthorne Option would permanently close the median at this location and require left turning traffic to either continue north to the newly signalized intersection at 179th Street, or south to the existing signalized intersection at 182nd Street. Both locations permit drivers to make a U-turn to access 180th Street or the shopping plaza. This closure is required because the column placement through this segment would otherwise create visual obstructions that would prevent drivers from seeing oncoming traffic in an unsignalized left turn. According to the report, the 179th Street/Hawthorne Boulevard intersection is expected to handle the diverted traffic effectively, as it would be signalized under the Hawthorne Option, though adjustments to signal timing would be made to optimize flow and further minimize queues. Similarly, southbound drivers who would have previously turned left at 180th Street would be directed to continue to 182nd Street for left turns or U-turns. This change may impact the PM peak LOS at 182nd Street, but additional signal timing adjustments could further manage traffic flow at that location.

The Metro ROW alignments, including the LPA, do not include a median gap closure at the 180th Street/Hawthorne Boulevard intersection as the alignments would be located along the Metro ROW.

- 21-6 See response to Comment 21-2.
- 21-7 Figure 2.3-29 has been revised as requested, and is included in Section 4.3, Corrections and Additions, of the Final EIR. This revision does not change the analyses or conclusions of the Draft EIR.
- 21-8 The durations of some construction activities identified in Tables 2.4-1 through 2.4-3 on pages 2-54 and 2-55 of the Draft EIR would overlap. Accordingly, adding a row to the table summing up these values would not provide an accurate total. Therefore, no changes were made in the Final EIR.
- 21-9 The construction durations presented in the Draft EIR have not changed. However, the anticipated opening year of the project has shifted based on additional time needed to complete the CEQA process. See MR-21: Cost Estimates and Schedule.
- 21-10 The comment is noted regarding the anticipated longer permitting process for the Hawthorne Option compared to the other alignment options. Metro would coordinate with local and state agencies during later design phases to address necessary permitting based on the alignment approved for implementation by the Metro Board. Specific details about permitting timelines are not available at this stage.

- 21-11 The status of the project in Table 3.0-1 is updated to “Construction” in Section 4.4, Corrections and Additions, of the Final EIR. This revision does not alter the analyses or conclusions of the Draft EIR.
- 21-12 As noted by the comment, the proposed South Bay Galleria Station along Hawthorne Boulevard is approximately a half mile walk from the Redondo Beach Transit Center. However, as shown in Figure 3.1-4 on page 3.1-19 of the Draft EIR, many existing bus transit services travel along Hawthorne Boulevard and pass by the location of the proposed South Bay Galleria Station on their way to the Redondo Beach Transit Center. Metro and other transit operators typically review and adjust their bus routes routinely, e.g., twice a year. The bus routes could be adjusted to provide an additional stop close to the proposed South Bay Galleria Station and connect riders to the Redondo Beach Transit Center. Transit agencies typically assess and adjust their services during the construction of new rail stations to ensure effective connections, considering factors such as rider demand and accessibility needs. By the time of construction of this project, the existing transit network would have the flexibility to adapt based on observed demand and transit operator assumptions. As noted above, the Metro ROW alignments, including the LPA, do not include a station on Hawthorne Boulevard.
- 21-13 See MR-11: Traffic Delay and Level-of-Service. The 2023 Transportation Detail Report, which evaluates non-CEQA issues and was published concurrently with the Draft EIR, describes the estimated future conditions in 2042 without the project and analyzes the traffic circulation effects on intersection delay and queues for the project, including the Hawthorne Option. Metro, as a regional transit agency, is not subject to local LOS-based requirements.
- 21-14 See response to Comment 21-12.
- 21-15 The Construction Traffic Management Plan (CTMP) would be integrated into the permitting schedule for the project to ensure it is developed and approved prior to construction activities. Metro would coordinate closely with local agencies throughout the plan’s review and approval process.
- 21-16 Page 3.1-21 of the Draft EIR consists of Table 3.1-5, which describes baseline conditions, not the Elevated/At-Grade Alignment. The City may be referencing a different page than the one noted in the comment. As defined in Chapter 2, Project Description, of the Draft EIR, the overall project is an extension of the light rail to the Torrance Transit Center, while the Trench and Hawthorne Options represent segments within the overall project that extend only from Redondo Beach (Marine) Station to 190th Street.
- 21-17 See response to Comment 21-2. The frequency of pedestrian injuries is closely related to the spacing and configuration of safe pedestrian crossings. As described in Section 3.1-3.12 of the Draft EIR, existing at-grade pedestrian crossings are provided at intervals of approximately 400 to 600 feet along Hawthorne Boulevard within the City of Lawndale. However, south of Artesia Boulevard, crossings are more widely spaced (over 1,000 feet), creating longer gaps without safe crossing points. Figure 3.1-14 in the Draft EIR shows that, north of Artesia Boulevard, there were six vehicle-pedestrian collisions over the five-year period of 2014 to 2018 distributed across all pedestrian crossings. In contrast, south of Artesia Boulevard, where crossings are more widely spaced, there were higher incidences of collisions, with two to five collisions occurring at each intersection and at least six collisions at 180th Street, where no signalized crossing is provided.

- Additional signalized crossings, as proposed by the Hawthorne Option, would help reduce the distance between safe pedestrian crossings on Hawthorne Boulevard between Artesia Boulevard and 182nd Street, better supporting pedestrian access and redistributing some vehicular traffic. Under existing conditions, there are approximately 1,000 feet between existing signals. To avoid these longer walks, pedestrians might choose to cross at unsignalized locations, which is allowed under California Vehicle Code Section 275, but increases the risk of vehicle-pedestrian collisions. The additional signalized crossings proposed by the Hawthorne Option would improve overall pedestrian safety by enhancing designated crossing facilities and reducing the risk of collisions.
- 21-18 See responses to Comments 21-2 and 21-17.
- 21-19 See response to Comment 21-4.
- 21-20 See response to Comment 21-2.
- 21-21 See response to Comment 21-3.
- 21-22 See response to Comment 21-4.
- 21-23 See response to Comment 21-5.
- 21-24 The City's request for lane striping is noted. All comments have been shared with the Metro Board for their consideration. Per the California Manual on Uniform Traffic Control Devices, double yellow striping may only be used to separate lanes travelling in opposite directions. For this location, the separation between the northbound left-turn lane and the southbound #1 travel lane would be designed to maximize clearance and ensure safety, while complying with applicable traffic control standards.
- 21-25 The text is updated as requested in Chapter 4, Corrections and Additions, of the Final EIR to reflect the latest zoning code update as of January 1, 2023. This revision does not alter the conclusions of the Draft EIR.
- 21-26 Additional information about the business and commercial goals of Hawthorne Boulevard Corridor Specific Plan, including the design vision for the North Torrance District as a gateway and active commercial environment, has been incorporated into Section 3.2-1.3 and Table 3.2-5, as shown in Section 4.6 of Chapter 4, Corrections and Additions, of the Final EIR. These additions do not alter the analyses and conclusions of the Draft EIR. Furthermore, Section 3.2-4.2.2 of the Draft EIR evaluates the Hawthorne Option's potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As detailed therein, light rail service along Hawthorne Boulevard and the addition of the proposed South Bay Galleria Station would support the goals of the Hawthorne Boulevard Corridor Specific Plan by offering an alternative to car travel and ensuring that the proposed improvements would align with future population and employment growth.
- 21-27 The Torrance Transit Center Station site plan has been updated in Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of the Final EIR, to include a note regarding the city's project.
- 21-28 Additional details about the land uses along Hawthorne Boulevard have been added to Section 3.2, Land Use and Planning, of the Draft EIR, as shown in Section 4.6, Corrections and Additions, of the Final EIR. These additions do not alter the conclusions of the Draft EIR.

- 21-29 The analysis in the Draft EIR indicates that construction-related pedestrian access closures for the Hawthorne Option could last for months in some locations, not years. Oversight and review by local agencies regarding the CTMP would occur prior to any closures. No revisions were made in the Final EIR in response to this comment.
- 21-30 The requested addition of the Hawthorne Boulevard Corridor Specific Plan to Table 3.2-5 has been made, as shown in Section 4.6, Corrections and Additions, of the Final EIR. The addition does not alter the conclusions of the Draft EIR. As described in Section 3.2-4.2 of the Draft EIR, the Hawthorne Option would not result in any significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.
- 21-31 As stated on page 3.3-53 of the Draft EIR, shadow-sensitive uses generally include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses; commercial uses, such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; plant nurseries; and existing solar collectors/panels. Shadows tend to be cast in a clockwise direction from west/northwest to east/northeast throughout the day across all seasons.
- For the northern portion of the Hawthorne Option, where some residential properties are located to the southwest of the alignment and the I-405 is positioned to the northeast, the elevated rail structure and proposed plexiglass soundwalls would not substantially cast shadows over residential properties due to the standard shadow patterns, as discussed in Section 3.3-4.4.2 of the Draft EIR. Shadows from the elevated guideway, including soundwalls, would instead primarily fall onto the I-405 corridor to the northeast. Additionally, the elevated guideway's location within the median of Hawthorne Boulevard and the width of the roadway would prevent significant shading of residential areas to the east. Overall, the proposed Hawthorne Option would not result in substantial shadow impacts on residential properties.
- 21-32 It is not clear what the City intends by the phrase "aesthetics of additional infrastructure." Pursuant to CEQA Guidelines Appendix G, Section I, the relevant criterion for projects located in an urbanized area, such as the Hawthorne Option, is if the project would conflict with applicable zoning and other regulations governing scenic quality. Section 3.3-4.3 of the Draft EIR evaluates whether the project would conflict with applicable zoning and other regulations governing scenic quality. Regarding the Hawthorne Option, see the analyses of key observation point (KOP) 13 through KOP 23, starting on page 3.3-90 of the Draft EIR. Cumulative impacts of the Hawthorne Option are addressed in Section 3.3-7.1.
- 21-33 In Section 3.4, Air Quality, of the Draft EIR, the methodology for the localized air quality impacts analysis utilized the most conservative assumption for proximity of sensitive receptors. The Excelsior Preschool is accounted for in the analysis, even if it wasn't specifically identified on the sensitive receptor map. Furthermore, the Draft EIR includes evaluation of potential air quality impacts on the nearest existing sensitive receptors to the potential areas of disturbance. Such receptors are located closer to the Elevated/At-Grade Alignment and Trench and Hawthorne Options than the school. Thus, the conclusions in Section 3.4-4.3 (less than significant) would similarly apply to the potential for the Elevated/At-Grade Alignment and Trench and Hawthorne Options to expose the Excelsior Preschool to substantial pollutant concentrations.

- 21-34 The City notes the impact conclusion in Section 3.7, Biological Resources, of the Draft EIR. Section 3.7, Biological Resources has been updated in Chapter 4, Corrections and Additions, of the Final EIR.
- 21-35 Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR correctly depicted the project's footprint extending into the Southern Tarplant Open Space Preserve adjacent to the Torrance Transit Center. However, this limited encroachment was inadvertently omitted from the impact discussion in Section 3.7-4.1.1 of the Draft EIR. Since publication of the Draft EIR, Metro has confirmed that the project would encroach on approximately 7,471 square feet of the 87,036 square foot preserve due to a necessary maintenance and emergency access easement. The impact analysis and conclusions of Section 3.7-4.1 of the Draft EIR have thus been revised to describe the impact to the preserve during construction and operation of the project, as shown in Section 4.11, Corrections and Additions, of the Final EIR. As described therein, implementation of new mitigation measure MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat would reduce the impact to the preserve to less than significant for all light rail alignment options and alternatives. With implementation of MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat, the project would not affect the preserve's watershed or compromise the viability of the 3:1 replacement ratio established by the City.
- 21-36 The requested text describing duplication of service and need for transfers has been added to Chapter 4, Corrections and Additions, of the Final EIR. This clarification amplifies the information contained in the Draft EIR and does not alter its conclusions.
- 21-37 Section 4.10, Corrections and Additions, of the Final EIR, includes a revision to Mitigation Measure MM-VIB-1: Vibration Control Plan to require the contractor to notify nearby receptors, including surrounding businesses near the Del Amo Bridge, of upcoming pile-driving activities at least 72 hours in advance. This revision to the mitigation measure does not alter the conclusions of the Draft EIR.
- 21-38 Height, length, and soundwall features would be identified during final design to reduce noise to below the FTA moderate noise criteria. Soundwall locations are identified in Figure 3.6-21 through Figure 3.6-24 of the Draft EIR. See Figure 3.6-31 of the Draft EIR for examples of soundwall placement. See response to Comment 21-31 regarding shade.
- 21-39 As discussed in Section 3.7-5 of the Draft EIR, Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys requires that a pre-construction nesting bird survey be conducted by a qualified biologist within four days (96 hours) prior to the start of construction activities to determine the presence of active nests within or directly adjacent to the construction zone. This would include surveys at El Nido Park, as it is adjacent to the construction zones for the Metro ROW light rail alignment options and alternatives.
- 21-40 The label identifying Amie Sump in Figure 3.10-2 of the Draft EIR has been corrected to Pioneer Sump, as shown in Section 4.14, Corrections and Additions, of the Final EIR. This revision does not alter the conclusions of the Draft EIR.
- 21-41 Excelsior Preschool at 19801 Mariner Avenue is located adjacent to, but just outside, the RSA boundary for Public Services shown in Figure 3.15-4 in the Draft EIR. In addition, as discussed on page 3.15-35 of the Draft EIR, the project would not construct any residential units or directly increase the population within the RSA. Therefore, the project is not

expected to lead to unplanned population growth that would increase demand for educational facilities.

21-42 As discussed in Section 3.15-2.3 of the Draft EIR, the project would be subject to Project Feature PF-T-1: Construction Traffic Management Plan. This requires coordination with the city and emergency service providers to ensure emergency access is provided to the alignments and component sites and neighboring land uses.

21-43 The City's support for the Elevated/At-Grade Alignment and opposition to the Trench and Hawthorne Options is noted. All comments have been shared with the Metro Board for their consideration. Contrary to the comment and as shown in Table 4.5-1 of the Draft EIR, the Hawthorne Option would result in fewer significant and unavoidable impacts than the Elevated/At-Grade Alignment, as the Hawthorne Option would result in a less than significant impact related to operational noise-level increases. The LPA, however, would avoid the operational noise impact by grade separating light rail.

21-44 As shown in Drawing RW-763 of Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, the Hawthorne Option is anticipated to include permanent acquisition of APN 4084-024-086 (Volvo Cars South Bay auto dealership) to allow the light rail structure to turn from Hawthorne Boulevard onto the Metro ROW. The elevated light rail structure would also require a permanent easement on APN 4084-024-026 (Jerome's Furniture, commercial business) to accommodate support structures necessary for the alignment to complete this turn. Additionally, a permanent easement on portions of APN 4084-024-023 (South Bay BMW/Mini auto dealership) would be required to allow for the placement of straddle bents to support the elevated light rail structure while also preserving visibility for motorists traveling along Hawthorne Boulevard. In order to construct the Hawthorne Option, temporary easements would be needed on portions of APNs 4084-024-023 (South Bay BMW) and 4084-024-063 (Penske South Bay Cadillac). A majority of the construction would occur within the street and public right-of-way, which are within Caltrans jurisdiction for this segment of Hawthorne Boulevard. As part of the advanced conceptual engineering process, Metro sought to minimize impacts to properties along the transition from Hawthorne Boulevard to the Metro ROW. However, due to geometric and engineering constraints, it was not feasible to fully avoid private property acquisitions where the alignment turns southeast toward the Metro ROW.

While potential effects on sales, property, and business license tax revenues do not constitute significant environmental impacts under CEQA, Metro is committed to minimizing property acquisitions and supporting the continued success of local businesses throughout construction and post-construction phases. The Metro ROW alignments, including the LPA, avoid affecting the properties noted in the comment as the alignments would travel along the Metro ROW.

21-45 Metro acknowledges the City's support for the Elevated/At-Grade Alignment and opposition to the Trench and Hawthorne Options. The LPA follows the Metro ROW for the entire length of the project. In selecting the LPA, the Metro Board took into account extensive community input, the anticipated environmental impacts identified in the Draft EIR, the long-term benefits of each alignment, and the estimated project schedule and costs. The Metro Board will continue to carefully weigh all relevant factors as part of its final decision on the project alignment following the release of the Final EIR. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

- 21-46 This submission is a copy of the City of Torrance’s September 19, 2018 letter to Metro regarding the Supplemental Alternatives Analysis (SAA) prepared for the project. Comments 21-46 through 21-48 predate the public review period of the Draft EIR (January 26 to March 27, 2023). Based on the SAA and input from stakeholders, including the City, Metro staff recommended two alternatives to be carried forward into the Draft EIR for further analysis: Alternative 1 (Metro ROW and overcrossing, without a station at Manhattan/Inglewood), and Alternative 3 (Hawthorne to 190th Street, without a station at Hawthorne/166th). At its September 19, 2018 meeting, the Metro Planning and Programming Committee approved the SAA and these staff recommendations. For additional details regarding the SAA and alternatives selection process, see Appendix 1-A, Notice of Preparation/Scoping Summary, of the Draft EIR.
- 21-47 The comment predates the public review period of the Draft EIR. See response to Comment 21-46.
- 21-48 The comment predates the public review period of the Draft EIR. See response to Comment 21-46.
- 21-49 This submission is a copy of the City of Torrance’s March 3, 2021 letter on the NOP for the Draft EIR. Comments 21-49 through 21-66 predate the public review period of the Draft EIR (January 26 to March 27, 2023). The alignment referred to in the NOP as “Alternative 1” was evaluated as the “Proposed Project” in the Draft EIR and is referred to as the “Elevated/At-Grade Alignment” in the Final EIR. Like the Elevated/At Grade Alignment, the LPA follows the Metro ROW for the entire length of the alignment.
- 21-50 The comment predates the public review period of the Draft EIR. See response to Comment 21-49. The alignment referred to in the NOP as “Alternative 2” was evaluated as the Hawthorne Option in the Draft EIR.
- 21-51 The comment predates the public review period of the Draft EIR. See response to Comment 21-49. The Draft EIR thoroughly evaluates the potentially significant impacts of the Elevated/At-Grade Alignment and Trench and Hawthorne Options, with appropriate study areas tailored to applicable environmental topics to ensure relevant resources and receptors are appropriately considered. Where significant impacts are identified, the Draft EIR proposes mitigation measures to eliminate or lessen impact. See the analyses and conclusions in Section 3.4, Air Quality, of the Draft EIR.
- 21-52 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR.
- 21-53 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.10, Hydrology and Water Quality, of the Draft EIR.
- 21-54 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.6, Noise and Vibration, of the Draft EIR.
- 21-55 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.15, Public Services, of the Draft EIR.

- 21-56 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.3, Aesthetics, of the Draft EIR.
- 21-57 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.4, Air Quality, and Section 3.5, Greenhouse Gas Emissions, of the Draft EIR.
- 21-58 The comment predates the public review period of the Draft EIR. For clarification, the Draft EIR evaluated a fully grade-separated alignment along Hawthorne Boulevard, which would avoid any delays to vehicles on roads. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.9, Hazards and Hazardous Materials, and Section 3.1, Transportation, of the Draft EIR.
- 21-59 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.10, Hydrology and Water Quality, of the Draft EIR.
- 21-60 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.6, Noise and Vibration, of the Draft EIR.
- 21-61 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.2, Land Use and Planning, of the Draft EIR.
- 21-62 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.1, Transportation, of the Draft EIR. See MR-11: Traffic Delay and Level-of-Service. The 2023 Transportation Detail Report, which evaluates non-CEQA issues and was published concurrently with the Draft EIR, analyzes all changes in roadways, including restriction of turning movements, signalization of intersections, etc. needed to implement the project along Hawthorne Boulevard.
- There is no requirement that at-grade rail systems install “traffic signal pre-emption systems.” In California, at-grade rail systems are permitted to be designed for operation in the roadway integrated with the traffic signaling system. As noted on pages 2-14 and 2-15 of the Draft EIR, all grade crossings would be designed to comply with California Public Utilities Commission (CPUC) requirements, and are subject to the CPUC’s approval, which would review all grade crossings for safety regardless of what alignment is ultimately selected. There are many examples of at-grade rail systems already in operation in the Los Angeles region.
- 21-63 The comment predates the public review period of the Draft EIR. See response to Comment 21-51. Pursuant to CEQA Guidelines Section 15064(e), economic effects are not considered effects on the physical environment. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. Additionally, the Draft EIR evaluates any indirect environmental impacts, such as growth-inducing impacts, which could result from economic and social changes.
- 21-64 The comment predates the public review period of the Draft. See response to Comment 21-51. Chapter 2, Project Description, of the Draft EIR, describes a proposed surface parking lot to be added at the Torrance Transit Center. Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR, analyzes the impacts of the parking lot on the physical environment. Metro would continue to coordinate with local cities on the 3%

- local match requirements, pending certification of the Final EIR and approval of the project by the Metro Board.
- 21-65 The comment predates the public review period of the Draft EIR. See response to Comment 21-51. Metro coordinated with stakeholders throughout the CEQA process, and provided opportunities for engagement through various means, including community open houses, neighborhood walks, door-to-door business outreach, transit rider intercepts, and briefings with key stakeholders. Metro would continue to actively engage with the community.
- 21-66 The comment predates the public review period of the Draft EIR. See response to Comment 21-51. The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.
- 21-67 This submission is dated November 1, 2022. Comments 21-67 through 21-74 predate the public review period of the Draft EIR (January 26 to March 27, 2023). The City's support for the Metro ROW alignment as of November 1, 2022, has been noted for the record and shared with the Metro Board for its consideration.
- 21-68 The comment predates the public review period of the Draft EIR. See response to Comment 21-67.
- 21-69 The comment predates the public review period of the Draft EIR. See response to Comment 21-67.
- 21-70 The comment predates the public review period of the Draft EIR. See response to Comment 21-67.
- 21-71 The comment predates the public review period of the Draft EIR. See response to Comment 21-67.
- 21-72 The comment predates the public review period of the Draft EIR. See response to Comment 21-67. The entire length of the light rail guideway would be enclosed with fencing, soundwalls, or a combination of both, to prevent unauthorized access. Recreational paths would be located outside of enclosed areas, reducing potential interactions between pedestrians and trains. See MR-8: Light Rail and Freight Train Safety.
- 21-73 The comment predates the public review period of the Draft EIR. See response to Comment 21-67.
- 21-74 The comment predates the public review period of the Draft EIR. See response to Comment 21-67, as well as the analyses and conclusions in Section 3.6, Noise and Vibration, Section 3.3, Aesthetics, and Section 3.1, Transportation, of the Draft EIR. See MR-10: Changes to Community Character and MR-11: Traffic Delay and Level-of-Service.
- 21-75 The City's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. Like the Elevated/At-Grade Alignment, the LPA would be located within the Metro ROW. However, unlike the Elevated/At-Grade Alignment, the LPA light rail guideway (as well as Trench and Hawthorne Options) would be fully grade-separated from all roadways.
- 21-76 See response to Comment 21-75.
- 21-77 See response to Comment 21-75.
- 21-78 See response to Comment 21-75.

- 21-79 CEQA does not require analysis of economic or social impacts unless they result in or are linked to a significant change in the physical environment. Metro has provided additional information on potential changes to Hawthorne Boulevard in the responses, as well as the 2023 Transportation Detail Report and 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR. Impacts related to connectivity and accessibility are addressed in Section 3.1, Transportation, of the Draft EIR. See MR-1: Selection of Alternatives for more information regarding constructability challenges for the Hawthorne Option.
- 21-80 See response to Comment 21-75.

**Submission 22 Yvette Hall, City of Lawndale**

- 22-1 The City introduces concerns that are detailed further in Comments 22-2 through 22-3. See responses to Comments 22-2 to 22-153.
- 22-2 The Draft EIR establishes baseline conditions in accordance with CEQA Guidelines Section 15125(a), using the environmental setting as it existed at the time the Notice of Preparation was published (January 29, 2021), except where noted in individual sections. Each environmental resource topic in Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR, including air quality, greenhouse gas emissions, land use, and transportation, includes a detailed description of baseline conditions. For all environmental topics, the baseline conditions include no light rail transit service, and the Draft EIR analyzes the impacts of introducing new light rail transit service.
- 22-3 The Draft EIR analyzes the impacts of introducing light rail service within the existing freight rail corridor, comparing these impacts against the baseline conditions of no light rail transit in the area. The increase in rail activity associated with the project, including the frequency of crossing, was evaluated in each relevant section of the Draft EIR, including transportation, noise, and vibration impacts. For example, Section 3.1, Transportation, of the Draft EIR, examines the impacts of increased crossing frequency on bicycle and pedestrian safety and emergency response times within the corridor. The Draft EIR similarly includes analysis in the other technical sections to evaluate and address potential environmental impacts. Section 3.6, Noise and Vibration, of the Draft EIR, analyzes potential effects from increased rail activity compared to current conditions with only occasional freight train operations. Therefore, the Draft EIR provides a comprehensive assessment of the anticipated changes and the impacts related to the addition of frequent light rail service and does not mischaracterize baseline conditions or environmental effects.
- 22-4 The Draft EIR's analysis of community division considers both the physical layout and access within the community. Although the Elevated/At-Grade Alignment would introduce additional light rail trains within the Metro ROW, this increase in train frequency does not constitute a physical division. All existing designated rail crossings at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets would remain accessible, allowing residents to cross the Metro ROW as they currently do. As reflected in Chapter 2, Project Description, of the Draft EIR, the design takes into account the narrowing of the Metro ROW between 170th Street and Grant Avenue. Even with increased rail service, the Metro ROW configuration would not isolate any one part of the community or restrict connectivity between the areas. See MR-10: Changes to Community Character.

- 22-5 The light rail guideway of the Hawthorne and Trench Options, as well as the LPA, are fully grade-separated and would have no effect on emergency response times. See MR-1: Selection of Alternatives and MR-12: Emergency Access.
- Section 3.1, Transportation, of the Draft EIR thoroughly analyzes the impact of adding gate-controlled, at-grade light rail crossings at 170th Street and 182nd Street for the Elevated/At-Grade Alignment. As discussed in Section 3.1-4.4.2 of the Draft EIR, these crossings would require emergency responders to either wait briefly while gates are down, or re-route to an alternate crossing. The wait-time would typically be less than one minute. Under CEQA, a change in circumstance alone does not constitute a significant impact. The impact threshold is whether the project would result in *inadequate* emergency access. Emergency response needs vary by location and time; not every response would necessitate crossing the tracks at 170th or 182nd Streets, and an approaching train would not always coincide with an emergency vehicle's path.
- Although the Elevated/At-Grade Alignment would increase the frequency of blocked crossings relative to existing freight service, this situation is common in Los Angeles County where emergency responders have adapted effectively to the introduction of at-grade light crossings. In the City of Lawndale, seven at-grade freight crossings currently experience longer gate-down times with existing freight operations, suggesting that local emergency responders have developed practices and training for maintaining response times when a crossing is briefly blocked.
- 22-6 The Draft EIR thoroughly addresses the impacts associated with an increase in rail frequency, accurately characterizing existing conditions and comparing them to anticipated conditions with the project in place. For example, Section 3.2, Land Use and Planning, of the Draft EIR, analyzes the potential changes to land use with implementation of the project. Although additional light rail trains would operate within the corridor, all existing crossings would remain open, and the light rail trains would not physically divide the community. Furthermore, the Trench Option and LPA would fully grade separate the light rail trains from roadways. See MR-10: Changes to Community Character. Section 3.6, Noise and Vibration, of the Draft EIR, analyzes changes in noise using the FTA's 2018 Transit Noise and Vibration Impact Assessment Manual, which specifically directs that the differences between current freight operations and future conditions with both the proposed light rail and ongoing freight operations be evaluated. This method ensures a comprehensive assessment of "before and after" impacts on the community and provides a clear comparison of conditions with and without the project, freight train activity in the Metro ROW, and future conditions with proposed light rail and continued freight train activity in the Metro ROW. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-5: Vibration Impact Types and Impact Thresholds, and MR-11: Traffic Delay and Level-of-Service. Additionally, see Section 3.3, Aesthetics, Section 3.15, Public Services, and Section 3.16, Other CEQA Considerations, of the Draft EIR.
- 22-7 The project is evaluated as a standalone project under CEQA because it has a logical terminus and independent utility, serving a specific transit need between Redondo Beach and Torrance without requiring additional phases to function effectively (*Del Mar Terrace Conservancy, Inc. v. City Council* (1992) 10 Cal. App. 4th 712). The cumulative impact analysis in the Draft EIR incorporates regional projections from the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which accounts for other Metro rail projects and their combined

regional effects. In doing so, the Draft EIR evaluates the potential growth effects from past, present, and probable future projects. Each Metro project has specific local objectives, routes, and impacts that must be assessed individually to ensure an accurate and meaningful analysis under CEQA. Evaluating each project independently allows for the consideration of project-specific conditions, resources, and community concerns, while cumulative impacts are addressed within the framework of regional planning documents.

22-8 The 2009 Harbor Subdivision Alternatives Analysis received federal funding to complete planning studies, and Metro initially anticipated preparing a joint CEQA and NEPA document due to the potential for federal funding sources at that time. However, the project was put on hold, and upon resuming environmental planning in 2020, Metro no longer assumed federal funding. The project is now proposed to be funded through local and state sources, including Measure R (2008), Measure M (2016), and a state grant (2018). No federal agency currently holds discretionary authority or jurisdiction over the project. Therefore, NEPA does not apply.

The funding tables provided in the letter identify the \$231.3M of Transit and Intercity Rail Capital Program (TIRCP) funding, which is a state funding source, not a federal one.

22-9 Other Metro rail projects have completed joint CEQA and NEPA documents because they involved specific federal funding sources or federal agency approvals, which triggered NEPA compliance for those projects. Regardless of funding sources, the project would still be consistent with CEQA's requirements for an independent, standalone project, as it has been developed with logical endpoints and independent utility. See response to Comments 22-7 and 22-8 on piecemealing and funding sources for the project.

22-10 See response to Comment 22-8. The scoping process in 2010 included federal agency involvement, because, at the time, Metro anticipated using federal funding sources. The project is currently proposed to be funded through local and state sources. Metro invited federal agencies to participate in the 2021 scoping process for the Draft EIR, but no federal agency provided any scoping comments. Table 2.6-1 of the Draft EIR does not list any federal agencies as responsible agencies under CEQA, because none have discretionary authority over the project.

22-11 Metro acknowledges that the project's current cost estimate exceeds the amount of funding that has been secured to date. Metro is continuing to explore additional funding sources and strategies to ensure the project could be fully funded and completed as planned.

22-12 Although there is a funding gap for the project, Metro remains committed to delivering a cost-effective project that meets the stated project objectives and balances the need to minimize environmental and community impacts. Federal funding is not proposed. The Draft EIR evaluates the potential environmental impacts based on the project as proposed, independent of funding sources. Should federal funding be needed in the future, the project would undergo NEPA review as required, but this alone would not alter the CEQA analysis or require changes to the Draft EIR.

22-13 The City appears to be referring to information provided in the 2023 Metro Cost Estimates Summary presentation, which states that the funding plan and construction schedule would be prepared after selection of the LPA. CEQA requires that potential environmental impacts are evaluated as early as feasible in the planning process to enable environmental considerations to influence project and design (CEQA Guidelines Section 15004[b]). For

public projects, an EIR should be prepared at the earliest feasible time so that the project sponsors may incorporate environmental considerations into project conceptualization, design and planning. Each rail alignment evaluated in the Draft EIR has unique costs and scheduling considerations. Metro will refine cost estimates and the funding plan specific to the LPA or other alignment ultimately selected by the Metro Board for implementation. Developing a funding plan after selection of the alignment is consistent with industry practice, as it allows for more accurate budget and phasing because it is closer in time to when construction would begin.

22-14 See response to Comments 22-8 through 22-10.

22-15 CEQA does not require that every construction detail be finalized at the time of the EIR. Most projects subject to CEQA rely on future, site-specific construction documents, such as the Construction Traffic Management Plans (CTMP), to manage temporary construction-related traffic impacts. As is standard practice, the CTMP would be prepared in later phases, once details, such as construction methods, phasing, and work-site logistics, are refined. A requirement to prepare a CTMP is a standard precaution “to address the ordinarily anticipated inconvenience and danger that arises when significant construction activity occurs in a congested environment” (*Protect Telegraph Hill v. City and County of San Francisco* (2017) 16 Cal.App.5th 261).

As specified in Project Feature PF-T-1: Construction Traffic Management Plan, the CTMP would follow Metro’s Rail Design Criteria and standard Metro practice, to manage temporary effects on local roadways, pedestrian paths, and transit routes. As is typical for large infrastructure projects, the CTMP would be submitted to the local jurisdiction, and for certain areas, to Caltrans, to meet the transportation needs of communities and manage any temporary traffic disruptions. Key measures included in the CTMP would ensure access for vehicles, pedestrians, and cyclists, detour routes during road or lane closures, emergency access protocols, and coordination with affected cities and Caltrans. The CTMP would be updated as the project progresses and new information about construction logistics becomes available.

22-16 The City expresses general concerns about the adequacy of mitigation measures, citing “deferred studies, analyses or policies.” However, the City does not specify which mitigation measures they believe to be deferred or inadequately addressed. All mitigation measures proposed in the Draft EIR are grounded in established standards, methods and guidelines, commonly accepted under CEQA for large-scale transportation projects.

The Draft EIR’s methodology for evaluating project impacts and determining mitigation is consistent with standard and best practices under CEQA, and the measures proposed are similar to those successfully implemented in other Metro projects. The project features included in the Draft EIR provide specific commitments that are part of the project. In cases where additional studies or policies are referenced, this is done to ensure tailored, site-specific design solutions informed by best available data. Such practice ensures flexibility as design progresses while still adhering to well-established and effective standards.

The comment’s footnote purports to provide an example where a land use mitigation measure is included in the Draft EIR, despite impacts being less than significant. This interpretation is incorrect. As described in Section 3.2, Land Use and Planning, of the Draft EIR, page 3.2-22, the Hawthorne Option would have a significant impact related to crossings during construction; therefore, Mitigation Measure MM LU-1: Temporary Crossings is

- included to address this impact of the Hawthorne Option. As stated on page 3.2-29 of the Draft EIR, no mitigation measures are required for the Elevated/At-Grade Alignment and Trench Option. Similarly, no mitigation measures are required for the LPA. With implementation of Mitigation Measure MM LU-1: Temporary Crossings, the Hawthorne Option’s land use impact would be reduced to less than significant with mitigation. For each significant impact identified in the Draft EIR, feasible mitigation measures are proposed to reduce or eliminate the impact. Although not relevant here, it should be noted CEQA does not prohibit agencies from adopting mitigation measures for impacts that may be less than significant, particularly for public projects in which the lead agency is the project proponent.
- 22-17 As described in Chapter 1, Introduction, and Chapter 2, Project Description, of the Draft EIR, the project is a proposed extension of light rail from the Redondo Beach (Marine) Station to the Torrance TC. The term “Proposed Project” was assigned to the Elevated/At-Grade Alignment in the Draft EIR, as that was the alignment that has been historically studied. For the segment of the alignment north of 190th Street, the Draft EIR studies two alignment options—the Trench Option and the Hawthorne Option. South of 190th Street, all alignment options converge into a single proposed alignment that terminates at the Torrance TC.
- In *Washoe Meadows Community v. Department of Parks and Recreation*, cited in the comment, the EIR did not identify a proposed project but instead described five very different alternative projects. In contrast, the alignment options here are closely related and all serve the same basic objective: extending the light rail to Torrance in a way that is cost-effective and minimizes impacts. The Draft EIR presents a unified project with alignment options that allow the public and decision-makers to consider the impacts of each option while focusing on the central purpose of the project to extend light rail from the Redondo Beach (Marine) Station to the Torrance TC. Additionally, the Draft EIR clearly distinguishes between alignment options in the headings and labeling of figures and tables, making it clear which option is being discussed at each point. This structure provides transparency and allows the reader to follow and evaluate the differences between the options easily, supporting meaningful public and agency review.
- 22-18 Section 2.1-1 of the Draft EIR describes the high-capacity bus transit centers at the Redondo Beach TC and Torrance TC. These city TCs are referred to as high-capacity because they serve as major transfer hubs for multiple bus providers operating in the South Bay and are capable of accommodating high volumes of passengers and serving transfers from proposed rail stations to bus.
- 22-19 Figure 2.1-2 shows the project area boundaries, which are further detailed in Section 2.1-1 of the Draft EIR.
- 22-20 The project objectives serve to define the overarching goals and desired benefits of the project. As required by CEQA, the project objectives guide the selection of a final alignment without being so specific that they preclude the consideration of a reasonable range of alternatives (see CEQA Guidelines Section 15124[b]). By establishing these objectives, Metro is able to evaluate the potential benefits of each option, balancing considerations such as environmental, economic, and community impacts.
- The objectives identified, including reducing air pollution and greenhouse gas emissions, minimizing environmental impacts, and providing a cost-effective project, are achievable and quantifiable within the scope of the project’s design and construction. They reflect Metro’s commitment to sustainable, environmentally responsible, and community-sensitive

- transit solutions. Additionally, broad objectives are a standard practice in environmental planning under CEQA, as they allow for meaningful comparisons across alternatives that might achieve the goals in different ways.
- 22-21 The City asserts that the Draft EIR is not clear on property acquisitions. However, Section 2.4-1 of the Draft EIR describes the property acquisitions that would be required to construct and operate the project, and Appendix 2-A of the Draft EIR and the 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR, provide detailed information on the proposed property acquisition needs. Metro has designed the project to avoid displacement of residents. North of 190th Street, Metro owns the ROW along the existing corridor, meaning only minimal permanent non-residential property acquisitions are anticipated in this area, primarily for the TPSSs to support operations. See MR-8: Light Rail and Freight Train Safety for more information regarding how the Metro ROW has sufficient width to fit the light rail project within the existing corridor. South of 190th Street, Metro and BNSF share ownership of the rail corridor. Metro is coordinating with BNSF to determine any additional Metro ROW needs within this segment to accommodate the new tracks.
- 22-22 The width of the Metro ROW varies across the project area. Most segments measure 100 feet, but some are narrower (75 feet) or wider (over 150 feet). Figure 2.3-2 in the Draft EIR illustrates the approximate Metro ROW widths specifically between Inglewood Avenue and Manhattan Beach Boulevard. Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and the 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR, show detailed Metro acquisition information. Metro has completed a property boundary survey in Spring 2025 to confirm boundary lines, which is reflected in the Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative.
- The footnote that the City refers to does not apply to Figure 2.3-2 in the Draft EIR; it refers to Figure 2.3-3 in the Draft EIR, which shows the retained fill cross-section. Retained fill would elevate portions of the alignment to maintain the required clearance over local streets and rail infrastructure. This type of elevation would help enable the project to remain within the existing Metro ROW, where feasible.
- 22-23 Chapter 2, Project Description, of the Draft EIR provides an overview of the construction types proposed for the elevated structures. The alignment description also provides information on where specific structure types, such as columns or retained fill, would be located. Further details on the specific structural support type (columns or retained fill) would be determined by site conditions, safety requirements, and space constraints.
- 22-24 The typical cross-sections are intended to provide a general representation of the project's layout throughout the corridor rather than exact measurements, as spacing varies depending on specific site conditions. With regard to separation between light rail and freight tracks, Metro has designed the project to ensure adequate separation based on applicable safety standards and engineering requirements. See MR-8: Light Rail and Freight Train Safety, and Draft EIR Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for more details on the placement of relocated freight and light rail tracks.

- 22-25 As stated on page 2-10 of the Draft EIR, the proposed light rail tracks would cross over Artesia Boulevard on a newly constructed bridge, which would be located adjacent to the existing freight bridge. This new bridge structure is shown in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR (sheet T-108) and its impacts are analyzed across all relevant environmental resource topics as part of the Elevated/At-Grade Alignment and Trench Option. Also see Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative.
- 22-26 See response to Comment 22-24. Chapter 2, Project Description, of the Draft EIR, provides an overview of freight track relocations, with detailed plans provided in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR. The multi-use paths would be approximately 20 feet wide between 159th Street to 170th Street and approximately 10 to 20 feet wide from Grant Avenue to 182nd Street. Final dimensions would be refined in the next phase of design, pending the Metro Board's certification of the Final EIR and approval of the project. Figures 2.3-3 and 2.3-4 illustrate a wall separating the multi-use path from the relocated freight line. The level of detail provided in the Draft EIR and underlying ACE drawings, is consistent with CEQA Guidelines Section 15124, which prescribes that an EIR's project description "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact."
- 22-27 See response to Comments 22-19 to 22-26. The level of detail provided in the Draft EIR is consistent with CEQA Guidelines Section 15124, which provides that an EIR must provide a "general description" of the project's technical characteristics, but "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact."
- 22-28 It is reasonable to assume that Metro would continue to procure and operate the same type of light rail vehicles currently used across the Metro rail system. The basic dimensions, appearance, and material composition of these vehicles are standardized to ensure system-wide compatibility, operational efficiency, and consistency in rider experience. Should Metro update its light rail vehicle fleet in the future, any new models would still need to comply with these established standards to ensure that the light rail network functions as designed. Consequently, potential changes in vehicle models would not introduce impacts beyond those evaluated in the Draft EIR, which evaluated potential environmental impacts (including those related to aesthetics and air quality) based, in part, on the deployment of light-rail-vehicle types currently used by Metro along the project alignments. Assuming otherwise would be speculative. Additionally, Metro light rail vehicles are electrically powered, meaning that they do not emit exhaust.
- 22-29 The additional elements refer to the overhead contact system (OCS), traction power substation (TPSS), and communications and signaling buildings. These elements, along with size, location, and numbers, are described in Section 2.3-4-4, pages 2-43 to 2-47, of the Draft EIR. These elements are standard to Metro's light rail network and are described in Chapter 2, Project Description, of the Draft EIR to allow for meaningful public comment on their roles and potential impacts within the project area. Additionally, Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR provides advanced conceptual engineering drawings to clarify placement and configuration. Also See Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative.
- 22-30 The exact OCS configuration, including the number and location of single versus dual poles, would be refined during the detailed design phase, pending the Metro Board's certification

of the Final EIR and approval of the project. While the Draft EIR describes the typical setup of the OCS—using poles to support overhead wires in certain sections—these details do not substantially alter the environmental impact analysis. The Draft EIR evaluates the OCS as a whole, including its potential visual and construction-related impacts, and this evaluation remains accurate regardless of the specific pole configuration. Additionally, Metro’s standard OCS designs are similar across its rail network, ensuring consistency with established design standards.

22-31 Chapter 2, Project Description, of the Draft EIR identifies the preliminary locations of the TPSS sites on page 2-45. While some flexibility is retained to ensure TPSS buildings align with context-sensitive urban design principles, this does not constitute a lack of specificity under CEQA. The phrase “urban design principles” generally refers to context-sensitive design. This means that the TPSS facilities would integrate appropriately with surrounding environments and maintain compatibility with local aesthetics. This flexibility allows Metro to implement specific design choices based on the unique character of each TPSS location and to consider community input, without affecting the overall impact analysis presented in the Draft EIR. The 2023 Urban Design Report, published concurrently with the Draft EIR, provides additional information regarding the project’s preliminary design standards.

22-32 The aesthetics analysis was prepared in accordance with the CEQA Guidelines and Metro procedures. Detailed aesthetics impact analyses and explanations of impact determinations are provided on pages 3.3-54 through 3.3-120 of the Draft EIR. For the elements of the aesthetics analysis that did not require mitigation measures, the reasoning was given in the Draft EIR for why the potential impacts did not reach the level of significance. In addition, the Draft EIR includes 23 visual simulations showing “before” and “after” views of the project area, enabling reviewers to understand how the project elements may alter the surrounding landscape.

As part of this aesthetics impact analysis, the City of Lawndale’s Open Space Element (City of Lawndale, 1992b) was reviewed in the context of this project, and no goals or policies within that element were found to address visual resources or aesthetic quality/character. However, as stated on page 3.3-59 of the Draft EIR, the Metro ROW alignments would be consistent with Policy 2c of the then-applicable Land Use Element (City of Lawndale, 1992c), which states that the use of land shall include design features that create a positive impact for the surrounding area. After the Draft EIR was issued, the City of Lawndale adopted a General Plan Update (General Plan 2045), which replaces the prior General Plan in place at the time the Draft EIR for this project was issued. The General Plan Update does not include a standalone open space element, although open space is addressed in other elements, including the Resource Management Element and Land Use Element. The project’s unified design elements and landscape design would have an overall positive effect along the Metro ROW, as it would contribute positive visual elements, such as uniform landscaping, landscaped public space, and other amenities. The comment does not identify any specific policies in the City’s former General Plan or the General Plan Update that the project would be inconsistent with.

The detailed analysis on pages 3.3-55 through 3.3-114 of the Draft EIR concludes that none of the alignment options would conflict with applicable policies or regulations governing scenic quality. Therefore, this impact was determined to be less than significant. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See also MR-10: Changes to Community Character.

- 22-33 See response to Comment 22-32. For each resource topic addressed, the Draft EIR thoroughly evaluates the project’s consistency with the City of Lawndale’s policies and regulations. Regarding aesthetics, as explained on page 3.3-12 of the Draft EIR, the visual resources assessment considers unique views, views identified as being important in local plans or codes (e.g., protected views), views from designated scenic highways, or cultural modifications. No such resources were identified within the RSA.
- The City asserts that the proposed multi-use path would disrupt existing recreational features used by Lawndale residents but does not specify which features would be affected, limiting the ability to provide a detailed response. The proposed multi-use path is designed to enhance recreational opportunities for Lawndale residents by providing safe, accessible pathway along the Metro ROW that are designed to avoid interference with existing open space and recreational areas. Additionally, Metro’s Tree Policy requires a minimum tree replacement ratio of 2:1 (or 4:1 if the tree is considered a heritage tree) with California-native or other drought-tolerant trees, as described on page 3.3-69 of the Draft EIR. This policy ensures that any trees removed would be replanted in a visually appealing manner, preserving and enhancing the aesthetic character of the area. For further information, see MR-10: Changes to Community Character.
- 22-34 See response to Comment 22-32. At the time Metro published the Draft EIR, the City of Lawndale’s General Plan designated the Metro ROW “Public Facilities/Schools,” not open space (City of Lawndale, 2023). Although the City’s General Plan Update, which the City approved in December of 2023, identifies this area as open space, CEQA did not require the Draft EIR to evaluate consistency with that plan, as it had not yet been approved when Metro prepared the Draft EIR (*Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1145, fn. 7). The City’s adoption of the General Plan Update does not constitute significant new information requiring recirculation of the Draft EIR under Public Resources Code Section 21166 and CEQA Guidelines Section 15088.5, because the change in land-use designation does not change the actual physical environmental conditions along the Metro ROW. The project’s design includes enhancements, such as tree planting and landscaping along the multi-use path that would complement the existing character in the area. For additional information, see MR-10: Changes to Community Character.
- 22-35 See response to Comment 22-32. Under CEQA, the presence of a new element, structure, or other above ground elements does not automatically imply there would be a significant impact. The City’s Land Use Element of the General Plan incorrectly identifies the Metro ROW as open space rather than its current use as an active rail corridor. Metro acknowledges that residents currently use the Metro ROW as recreational space, although it is not a designated park or walkway, and its purpose is rail transportation. See MR-10: Changes to Community Character for more information.
- 22-36 See response to Comments 22-33 through 22-35 and MR-10: Changes to Community Character.
- 22-37 Under CEQA, the introduction of a new element, structure, or other above ground structures or wires does not automatically constitute a significant aesthetic impact. Figure 3.3-17, View 12, in the Draft EIR depicts the Metro ROW, which includes a greenway with mature trees, and View 48 depicts a residential area south of the Metro ROW. These locations are considered urbanized, as they are either within or surrounded by highly developed areas. In the context of the entire project area, they are not visually unique.

- 22-38 The City does not specify the other fundamental aesthetic elements that they believe are missing and does not provide specifics for inadequate methodologies. Baseline descriptions and figures of the existing and proposed aesthetic conditions are provided on pages 3.3-11 through 3.3-54 of the Draft EIR.
- 22-39 See response to Comment 22-37. The photographs provided by the City illustrate existing conditions and light rail infrastructure, consistent with the visual simulations provided in the Draft EIR. The existing Metro ROW runs through urbanized areas with diverse land uses where transportation infrastructure and built-up surroundings are already prominent. While the project would introduce new elements, the overall visual impacts would be less than significant.
- 22-40 See response to Comments 22-37 and 22-39. The photographs provided by the City illustrate existing conditions and light rail infrastructure, consistent with the visual simulations provided in the Draft EIR. The existing Metro ROW runs through urbanized areas with diverse land uses, where transportation infrastructure and built-up surroundings are already prominent. While the project would introduce new elements, the overall visual impacts would be less than significant.
- 22-41 The Draft EIR addresses potential impacts on aesthetics and visual resources, including effects from the presence of new structures, such as poles, wires, and soundwalls. Maintenance of these features falls under Metro’s standard procedures, which have been developed and refined over years of operating similar transit lines. The proposed light rail guideway would operate in a sealed corridor, meaning that transit riders would not have direct access to the surrounding rail corridor or to deposit litter or graffiti, and security fencing would prevent access to non-station areas.
- Metro has established procedures to maintain the cleanliness and appearance of its transit corridors. This includes a graffiti program that requires the removal of graffiti within 24 hours of when it is reported and the use of anti-graffiti coating, where possible. All surfaces within the project’s station public areas (within the touch zone) would have anti-graffiti coatings. Additionally, Metro’s standard operations and maintenance plans address routine landscaping, vegetation management, and litter removal activities. Maintenance agreements with local jurisdictions would also be established as project design progresses.
- Additionally, Metro has prepared a Homeless Outreach Plan to address the presence of unhoused individuals along its corridors. The program involves partnerships with local law enforcement and social services to connect individuals and families to resources and services. See MR-9: Light Rail Security and MR-18: Homelessness.
- 22-42 See response to Comment 22-41. While design plans for art, wayfinding, and branding would be refined in future phases, Metro is committed to ensuring that public art enhances, rather than detracts from, the aesthetic quality of the surrounding area. Metro’s Art Program Policy, described on page 3.3-1 of the Draft EIR, emphasizes community involvement and artist collaboration to ensure the artwork contributes positively to the environment.
- 22-43 See response to Comment 22-41.
- 22-44 Apart from construction nighttime lighting impacts, the Draft EIR concluded that the impacts of the Metro ROW alignments and Hawthorne Option on aesthetic and visual resources would be less than significant. Mitigation Measure MM-AES-1: Construction

- Lighting, is provided for all options, including the LPA. The Draft EIR provides a sufficient level of project design to evaluate potential aesthetic impacts under CEQA and describes all of the major project components, including structures, landscaping, and visual elements.
- 22-45 Soundwalls are included as noise mitigation measures under Mitigation Measure MM-NOI-2: Soundwalls and are not intended to mitigate aesthetic impacts directly. The locations of the proposed soundwalls are provided in Figures 3.6-21 through 3.6-24 and Tables 3.6-26, 3.6-31, and 3.6-33 of the Draft EIR, for the Metro ROW alignments and Hawthorne Option, respectively. No soundwalls in addition to what is described in the Draft EIR for the Metro ROW alignments would be required for the LPA. Section 3.3, Aesthetics, of the Draft EIR evaluates the visual effects of the soundwalls at each potentially affected key observation points (KOP), including the effects of the soundwalls when combined with the elevated light rail tracks and other vertical elements. As shown in Figure 3.3-59, the soundwalls would be designed with consideration of the surrounding context, and with materials, colors, and landscaping treatments to minimize their visual impacts and ensure they blend with adjacent development. Pursuant to Mitigation Measure MM-NOI-2: Soundwalls, materials, colors, landscaping, and/or other aesthetic treatments would be integrated into the design of the soundwalls to minimize dominance and scale. As concluded in Section 3.3-4 of the Draft EIR, the changes in visual quality due to the project, including soundwalls, would be neutral, as the new components would be consistent with the existing urbanized visual character of the corridor.
- 22-46 Compliance with Metro Design Standards is included as a project feature on page 3.3-10 of the Draft EIR. The Metro Design Standards refer to Metro’s Rail Design Criteria (MRDC), Metro’s Art Program Policy, Metro’s Transit Service Policies & Standards, Systemwide Station Design Standards Policy, and Standard/Directive Drawings, or equivalent.
- 22-47 Details of the Metro’s Tree Policy are provided on page 3.3-2 of the Draft EIR. Per CEQA Guidelines Section 15148, “[p]reparation of EIRs is dependent upon information from many sources. These documents should be cited but not included in the EIR.” Thus, while the Draft EIR references Metro’s Tree Policy, it was not required to include a full copy. The focus of CEQA is to identify and analyze potentially significant environmental impacts, not necessarily to provide a fully detailed design plan for every aspect of a project, including landscaping.
- The Draft EIR provides sufficient information to assess potential impacts related to landscaping. Project Feature PF-AES-2: Metro Design Standards further commits the project to implementing Metro’s design policies, which ensure high-quality landscaping and visual appeal. Section 3.3-4.3.2 of the Draft EIR provides details concerning landscaping, as relevant, in the text and corresponding visual simulations. The project’s unified design elements and landscaping would contribute positive visual enhancements, such as uniform landscaped public spaces. In addition, as relevant to the City of Lawndale, the 2023 Urban Design Report, published concurrently with the Draft EIR, provides that the project design would focus on preserving the open space character along Condon Avenue by retaining mature trees, where feasible, and introducing additional shade trees to enhance the corridor’s visual character. CEQA does not mandate a detailed landscape and maintenance plan at the EIR stage. Such details would be determined during final design.
- 22-48 The photos of Compton provided by the City show that specific area’s visual conditions, where hardscape predominates. This does not represent the Metro Design Standards or intended landscaping approach for the project. As stated in the Draft EIR and 2023 Urban

Design Report, published concurrently with the Draft EIR, Metro is committed to integrating the project into the surrounding environment to the extent feasible, with landscaping and tree replacement planned within the Metro ROW to preserve the corridor's general character. Potential impacts related to light and glare are analyzed in Section 3.3-4.4 in Section 3.3, Aesthetics, of the Draft EIR. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

- 22-49 The aesthetics impact methodology, including descriptions of representative views and viewers, is discussed on pages 3.3-12 and 3.3-13 of the Draft EIR. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The KOPS were selected to capture a range of typical views from various vantage points along the project corridor, with the goal of illustrating the potential visual changes from various perspectives, including the views by pedestrians, motorists, transit riders/commuters, employees and patrons and nearby residents. The KOP simulations provide a conceptual illustration of the visual changes associated with the above-ground elements, presenting a cross-section of locations where changes could be more noticeable to a larger number of viewers, as well as where changes would appear minimal. By including both substantial and minimal impact perspectives, the simulations provide a balanced and representative view of potential visual effects from different viewer types and exposure levels.

It should also be noted that CEQA does not require KOP simulations, or visual simulations generally. The KOP simulations are provided in the Draft EIR to give the public a conceptual understanding of potential visual changes resulting from the project. The purpose of these simulations is to aid in understanding, rather than to exhaustively illustrate every possible viewpoint.

- 22-50 See response to Comment 22-49. The Draft EIR includes several KOP figures that represent residential areas in Lawndale and nearby open spaces, including Figures 3.3-61, 3.3-62, and 3.3-63 in Section 3.3, Aesthetics, of the Draft EIR. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. This range of KOPs provides a balanced perspective on how different areas may experience visual changes due to the project.
- 22-51 The Draft EIR defined the RSAs for aesthetics as extending a quarter mile from the alignment, a standard distance in visual impact assessments that allows for focused analysis of areas most likely to experience significant visual change. As described on pages 3.3-7 to 3.3-8 in Section 3.3, Aesthetics, of the Draft EIR, the quarter-mile RSA accounted for several factors, including landform, vegetation, and atmospheric conditions, that objectively impact visibility and limit human sight. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In urban areas like the project corridor, views of the alignment would often be naturally obstructed by the intervening elements, which would prevent the project from being visually prominent beyond the RSA. Additionally, to ensure that areas outside of this primary zone are also considered, the Draft EIR analyzed visual impacts from major arterials, freeways, and railways, as those areas provide relevant sightlines to the alignment.
- 22-52 The comment is referring to the general definition of "visual quality" provided in the Draft EIR to help readers understand how aesthetic impacts are typically evaluated under CEQA. As explained in the Draft EIR, visual quality refers to the perceived aesthetics of a landscape, which indeed could vary based on viewers' values and perceptions; however, this definition

serves as a foundation for analyzing visual impacts systematically and is not an assertion about a specific community, including Lawndale.

The visual impact analysis was conducted following Federal Highway Administration (FHWA) criteria that assess how changes in the landscape, such as new structures, soundwalls, and lighting, might alter the visual character of a location based on objective factors like scale, contrast, and consistency with the existing environment. This approach ensures that all affected areas are evaluated with the same criteria, providing a fair, balanced assessment of potential visual impacts for communities along the project corridor.

- 22-53 The existing visual character of residential areas adjacent to the project is documented and shown in a range of representative views throughout Section 3.3, Aesthetics, of the Draft EIR, specifically in Figures 3.3-5, 3.3-15, 3.3-16, 3.3-17, 3.3-18, 3.3-21, 3.3-22, 3.3-24, 3.3-25, 3.3-27, 3.3-28, 3.3-38, 3.3-43, and 3.3-50. Each of these figures is discussed in the corresponding text, detailing how the project may alter these residential areas' views and visual character. CEQA does not require an EIR to describe every individual street within the project vicinity, and the Draft EIR appropriately provides an assessment of visual character representative of the corridor's neighborhoods.

While the Draft EIR notes that many residences were developed between the 1930s and 1970s, this timeframe reflects the general historical development of the area. The visual analysis does not understate the character or significance of these suburban neighborhoods. Instead, it provides a representative baseline for assessing the project's visual impacts.

As the project is located in an urbanized area, the applicable threshold is the potential for the project to conflict with applicable zoning and other regulations governing scenic quality. The analysis in Section 3.3-4.3 of the Draft EIR considers visual character and scenic quality impacts from public vantage points. The detailed analysis on pages 3.3-55 through 3.3-114 of the Draft EIR includes "before" and "after" visual simulations and concludes that none of the alignment options would conflict with applicable policies or regulations governing scenic quality. Therefore, this impact was determined to be less than significant. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

- 22-54 Figure 3.3-3 serves as a reference point within the existing conditions section of the Draft EIR and, accordingly, does not indicate future project impacts, which are discussed separately in the impact analysis. Section 3.3, Aesthetics, of the Draft EIR, includes KOPs representative of each type of proposed railroad crossing: light rail on an elevated structure, light rail at-grade, and light rail within a trench. This selection of KOPs provides a conceptual overview of anticipated visual changes and is designed to capture typical impacts without requiring exhaustive simulations for every potential viewpoint. This approach complies with CEQA by effectively disclosing a range of representative impacts on visual character and facilitating meaningful public review of anticipated changes. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

- 22-55 Page 3.3-22 of the Draft EIR identifies the primary uses south of Manhattan Beach Boulevard as including small-scale single- and multi-family residential buildings within the City of Lawndale, capturing the general residential character of this segment.

- 22-56 The Draft EIR provides distinct discussions for El Nido Park and the Metro ROW because they differ in purpose, ownership, and use. Page 3.3-31 of the Draft EIR addresses El Nido Park specifically, as it is an official recreational park owned by the City of Torrance and

- designated for public recreational use. In contrast, the Metro ROW is an active railroad corridor owned by Metro and is designated as a railroad corridor. While members of the community may use portions of the Metro ROW for recreational purposes, this is not an authorized use of the property.
- 22-57 The Draft EIR provides an analysis of potential light and glare impacts informed by the Metro Design Standards, as stated on page 3.3-11. These standards ensure that project lighting and materials would be consistent with other Metro light rail projects currently in operation, which prevent significant light and glare impacts. Best practices, such as using non-reflective surfaces where feasible, would be incorporated to minimize glare. Additionally, the project would comply with applicable lighting regulations, which would be verified during the permitting process and would include industry standards and/or technical lighting specification standards that are determined during the final design process.
- 22-58 See response to Comment 22-48 and response to Comment 22-57. Unlike fixed sources, train lighting is in motion, creating only brief, intermittent reflections as the train passes through, thereby minimizing sustained glare. Thus, the train lighting would not be considered a substantial source of light or glare, which could adversely affect views in the area. Furthermore, the lighting design for the light rail train and guideway would be focused on the rail corridor to ensure safety, with shielded and downward-directed lights that avoid casting light or spillover onto surrounding areas. Additionally, the urbanized project area already includes ambient lighting from streetlights, commercial sites, and traffic, meaning that train lighting would minimally impact overall light levels. Metro also incorporates non-reflective materials on train cars and associated infrastructure to further reduce glare from sunlight or artificial lighting. Further, the trains would not use flashing or rotating lights, which are more disruptive; rather, the trains would maintain consistent, non-pulsing lights for track visibility. Collectively, these design considerations would ensure light and glare impacts on daytime and nighttime views would not be substantially different than existing conditions and no significant impact would result.
- 22-59 See response to Comments 22-57 and 22-58. As stated in Section 3.3-2.4 of the Draft EIR, as part of the project, Project Feature PF-AES-2: Metro Design Standards would be used, which would require all lighting be compliant with Metro Design Standards. The lighting would be hooded, and angled away from adjacent land uses. Lighting industry standards and best practices for transit project lighting in light-sensitive or residential areas would be followed, in compliance with Metro Design Standards. These are aspects that the project must comply with and the construction contractor would also be required to implement.
- 22-60 Although the CEQA Guidelines do not establish criteria for evaluating shade and shadow impacts, the Draft EIR assesses shadow impacts on shadow-sensitive uses, such as outdoor recreational areas and public spaces where prolonged outdoor activities occur. Sidewalks, streets, and “buildings,” including residential buildings, are not considered shadow-sensitive uses, because temporary shadowing over these areas does not interfere with their basic purpose. Additionally, the shade and shadow pattern created by the elevated structures would be intermittent and would shift throughout the day, thus, not creating sustained shadow impacts. Due to the relatively dense arrangement of existing buildings, structures, and, in some cases, mature trees and vegetation in a large portion of the project area, a considerable amount of existing shadow coverage currently exists, including in residential areas near the alignment. The addition of the project in these areas would not result in a

substantial amount of new shadow coverage, and as previously stated, the casting of shadows would shift throughout each day, as well as change depending on the season of the year.

22-61 See response to Comments 22-32 to 22-60.

22-62 See MR-2: Operational Noise Analysis Methodology and Impact Thresholds. Sensitive uses were identified per the FTA's Transit Noise and Vibration Impact Assessment Manual (2018), which includes Category 1 high-sensitivity uses where quiet is an essential element (e.g., Zen garden, outdoor amphitheaters), Category 2 residential uses where people normally sleep, and Category 3 institutional uses with primarily daytime and evening use (e.g., schools, churches). It appears that the comment was intended to cite Section 21001 (not 21002) of the Public Resources Code. Metro's consideration of the project is consistent with the Legislative intent declared in Public Resources Code Section 21001(b), because the Draft EIR applied strict and well-established noise impact criteria and includes robust noise mitigation measures to reduce noise impacts to the maximum extent feasible. The California Legislature has also declared that there is "an imperative need for a comprehensive mass transit system in the southern California area, and particularly in Los Angeles County" and that it is the "policy of the state to foster the development of trade and the movement of people in and around the Los Angeles area for the benefit of the entire state" (Pub. Util. Code Section 30001[a]).

22-63 The air quality analysis in the Draft EIR thoroughly accounts for emissions from all vehicle trips associated with the project, including vehicle use by light rail patrons traveling to and from stations. The net regional effect of project operations would be a substantial reduction in vehicle trips and on-road vehicle miles traveled (VMT). Specifically, as detailed in Section 3.4-4.1.2 of the Draft EIR, the Elevated/At-Grade Alignment and Trench Option would reduce daily VMT by approximately 34,500 vehicle miles and the Hawthorne Option would reduce daily VMT by approximately 34,900 vehicle miles in the operational year of 2042. The LPA would follow the Metro ROW for the entire length of the project, and the light rail would be entirely grade-separated. Thus, the LPA would result in similar VMT benefits as the Elevated/At-Grade Alignment and Trench Option.

Further, Table 3.4-18 on page 3.4-44 of the Draft EIR presents a summary of the anticipated change in daily air pollutant emissions from project operations in the 2042 operational scenario year, which demonstrates a net decrease in emissions due to reduced VMT. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Regional transit projects, like this one, are generally acknowledged to result in reductions in vehicle trips and corresponding air pollutant emissions due to fewer individual car trips and reduced cold starts.<sup>1</sup> The air quality analysis presented in the Draft EIR was prepared in accordance with the South Coast Air Quality Management District (SCAQMD) guidance and satisfies the requirements of CEQA for operational impact analysis. No further analysis is warranted.

22-64 Site-specific soil contamination assessments are not specifically addressed in Section 3.4, Air Quality, of the Draft EIR. However, Section 3.9, Hazards and Hazardous Materials, of the

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<sup>1</sup> See FTA's *Public Transportation's Role in Responding to Climate Change* (January 2010) at <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/PublicTransportationsRoleInRespondingToClimateChange2010.pdf>.

Draft EIR, explicitly discusses Metro’s commitment to regulatory compliance for safe handling of potentially contaminated soils (see page 3.9-6). Specifically, as required by SCAQMD Rule 1166, which governs emissions of volatile organic compounds (VOC) during soil decontamination, all construction contractors would employ best practices for controlling VOC emissions during excavation, grading, soil handling, and treatment. Compliance with Rule 1166 involves detailed protocols, including advance soil sampling, ongoing monitoring, and use of containment measures, where needed, which are designed to reduce potential emissions of toxic air contaminants, such as VOCs, into the surrounding environment. In compliance with Rule 1166, soil sampling would be conducted prior to and throughout construction to detect any VOC-contaminated soil and appropriate containment, handling, and disposal measures would be followed. These measures help prevent the spread of contaminants beyond the work area, effectively minimizing the potential exposure for sensitive receptors near the project alignment.

Metro completed a Phase I Environmental Site Assessment (ESA) for the Metro ROW and Hawthorne Option as part of the Draft EIR, see Appendices 3.09A and 3.09B. As described in Chapter 2, Project Description, of the Draft EIR and further detailed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, Metro would conduct a Phase II site investigation for any properties with known or suspected contamination, and would carry out remediation measures as necessary to ensure compliance with applicable health and safety standards. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

22-65 Tables 2.4-1, 2.4-2, and 2.4-3 in Chapter 2, Project Description, of the Draft EIR, detail the import and export volumes anticipated during each phase of construction for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option, respectively. The tables also specify the projected maximum daily truck trips required for each construction phase, providing a clear breakdown of anticipated materials movement. Construction assumptions for the LPA are included in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, along with updates to analysis related to import and export.

Dust control measures are also thoroughly addressed in the Draft EIR. As noted in Section 3.4, Air Quality, of the Draft EIR, all contractors for the project must comply with the Metro Green Construction Policy and SCAQMD Rule 403 (Dust Control), both of which mandate effective best management practices and best available control measures to reduce dust and particulate matter emissions, as outlined in Project Feature PF-AQ-1: Metro Green Construction Policy Compliance and PF-AQ-2: SCAQMD Rule 403 Compliance on pages 3.4-24 and 3.4-25 of the Draft EIR. These practices include dust suppression strategies such as water application, use of covers on material piles, and limiting construction traffic on exposed soils. These measures ensure dust generation is minimized during the handling, import, and export of soils and materials.

22-66 See response to Comment 22-65.

22-67 See response to Comment 22-65.

22-68 The comment inaccurately suggests that the Draft EIR does not disclose the reductions in regional on-road VMT that would result from implementation of the project. The analysis provided on pages 3.4-38 and 3.4-39 of Section 3.4, Air Quality, of the Draft EIR, clearly presents these reductions in VMT for each of the three rail alignments. In the operational

year of 2042, the Elevated/At-Grade Alignment and Trench Option would each reduce daily regional VMT by 34,500 vehicle miles per day. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The LPA would result in the same VMT reduction as the Metro ROW alignments, and this information has been added in Section 4.9, Corrections and Additions, of the Final EIR to clarify the LPA's VMT analysis. The Hawthorne Option would reduce daily regional VMT by 34,900 vehicle miles per day.

To arrive at these reductions, the project's traffic engineers used the regional transportation model to estimate VMT reductions by calculating the difference in VMT between the Metro ROW alignments and the No Project scenario. The operational emissions analysis in Tables 3.4-18, 3.4-19, and 3.4-20 of the Draft EIR are based on these VMT reduction values, with corresponding pollutant emissions calculated by applying each pollutant's emission factor to the respective VMT reductions. This approach provides a transparent and reliable method to estimate VMT-related emissions reductions. Thus, the analysis presented in the Draft EIR is sufficient and based on the best available information available, and no further analysis is warranted.

22-69 The comment suggests that the discussion of the appropriate air quality significance thresholds provides false information, without specifying what information was inaccurate. The significance criteria outlined in Section 3.4-2.4.1 of the Draft EIR are drawn from the Appendix G of the State CEQA Guidelines. These are the same significance criteria as used by the City of Lawndale in its Draft EIR for the Lawndale General Plan Update (SCH No. 2022120088).

In terms of consistency with air quality plans, the Draft EIR evaluates the project's consistency with the SCAQMD Air Quality Management Plan (AQMP), the SCAG RTP/SCS, and the local General Plans. The SCAQMD AQMP relies on growth projections outlined in the SCAG RTP/SCS, which reflect municipal-level forecasts for population, housing, and employment in the region. This ensures that any potential increase in emissions was analyzed within the broader context of the region's air quality goals.

AB 2097 eliminates minimum parking requirements for certain development near public transit to promote housing density and reduce dependence on car travel. Its purpose is to support increased transit use and reduce VMT, thereby contributing to lower greenhouse gas (GHG) emissions. However, AB 2097 does not set or affect air quality thresholds under CEQA, nor does it govern the analysis of pollutant levels, toxic air contaminants, or emissions from the construction and operation of a transit project like this one. See response to Comment 22-73, below.

See response to Comment 22-64 regarding contaminated soils.

22-70 To clarify, the statement the City references on page 3.4-23 of the Draft EIR does not indicate that Metro is deferring mitigation. Rather, that page describes the SCAQMD's recommended approach in its CEQA Air Quality Handbook for assessing potentially significant air quality impacts, specifically cumulative air quality impacts. SCAQMD recommends that agencies consider feasible opportunities to mitigate cumulative impacts if emissions exceed regional thresholds. The cited text is part of the Draft EIR's general explanation of how air quality impacts are assessed, not a statement describing the impact determinations or mitigation measures for this project.

Of the three alignment options evaluated in the Draft EIR, only the Trench Option was determined to potentially exceed SCAQMD's mass daily threshold for nitrogen oxide (NOx) emissions during peak construction activities. This impact was addressed through Mitigation Measure MM-AQ-1: Zero or Near Zero Emissions Haul Trucks, which requires the use of low-emission trucks to minimize temporary NOx emissions during peak hauling activities. This mitigation measure would be enforced to the greatest extent feasible, factoring in the commercial availability of trucks meeting zero- and low-NOx heavy-duty-truck requirements at the time of construction. It reflects evolving market conditions and regulatory standards that continue to promote the availability of low-emission trucks. As time goes on, these heavy-duty zero- and low-NOx trucks would continue to penetrate the market to a greater and greater degree. As low-NOx heavy-duty trucks become more available, the implementation of Mitigation Measure MM-AQ-1: Zero or Near Zero Emissions Haul Trucks would remain effective at reducing NOx emissions to the extent feasible during construction, satisfying CEQA's requirements for feasible mitigation. Nonetheless, without being able to confirm that sufficient zero- and low-emission trucks would be available for use during construction of the Trench Option, the Draft EIR conservatively concludes that the Trench Option's construction air quality impact would be significant and unavoidable. If the Metro Board were to approve the Trench Option, it would be required to adopt a Statement of Overriding Considerations finding that the benefits of the Trench Option outweigh its unavoidable significant impacts.

The LPA requires far less trenching than the Trench Option. Like the Elevated/At-Grade Alignment, the LPA Alternative would not have potentially significant construction air quality impacts that would require mitigation measures. See Section 4.20 of the Final EIR, which provides clarifications to the analysis in Section 4.5-3.4.1 of the Draft EIR. As detailed in Section 4.20 of the Final EIR, the maximum daily emissions associated with construction of the LPA would be below the SCAQMD regional mass daily threshold screening levels, and construction air quality impacts of the LPA would be less than significant.

22-71 It is unclear whether the comment refers to generators that may be used during construction activities or during future operation of the project. In either case, the Draft EIR addresses potential air quality impacts from generator use both during construction and operations. Under CEQA, compliance with applicable regulatory standards could constitute substantial evidence that a project's impacts would be less than significant where compliance is reasonably expected; reliance on such regulatory schemes does not constitute improper deferral of mitigation (see e.g., *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884).

Regarding construction-phase generators, the Draft EIR explicitly describes that Metro would prioritize using grid-based electric power at any construction sites, minimizing the need for on-site generators. Should a generator be necessary, Project Feature PF-AQ-1: Metro's Green Construction Policy Compliance, described on page 3.4-24 of the Draft EIR, requires compliance with stringent emissions standards specifically designed to minimize particulate matter and pollutant emissions. This policy ensures that any potential emissions from construction-phase generators would be minimized and controlled.

As for long-term operations, generators would be located at TPSSs and would be used exclusively as emergency back-up power, operating only in the event of an electrical outage. These generators would run under infrequent testing conditions, limited to 20 to 50 hours

per year, as required under SCAQMD Rule 1470. Such testing would produce a negligible level of emissions of air pollutants.

CEQA allows for reasonable reliance on compliance with well-established regulations and permits; agencies like Metro operate under the expectation that they will follow the law (see Evid. Code Section 664).

- 22-72 The Draft EIR's use of 2020 air quality data is consistent with SCAQMD guidance, which recommends that the air quality setting be based on the most recent three to five years of available data. While regional emissions of pollutants may have been lower during the COVID pandemic, this period does not invalidate the ambient air quality data recorded at regional monitoring stations. Ambient air quality data, such as those recorded at the LAX Hastings monitoring station, reflect a broader trend influenced by multiple factors and are not solely determined based on short-term fluctuations in traffic volumes. As shown in Table 3.4-13 of the Draft EIR, concentrations of pollutants measured during 2020 were not substantially different from concentrations in 2018 or 2019, indicating that the data still represents typical air quality conditions. Therefore, the Draft EIR provides the best available and most representative information at the time of its preparation.
- 22-73 CEQA requires an analysis of growth-inducing impacts, which is provided in Section 3.16, Other CEQA Considerations, of the Draft EIR. The project is designed to serve the current and planned growth in population, housing, and employment along the corridor, rather than to induce new development. The growth-inducing analysis relies on the demographic forecasts and growth projections set forth in SCAG's 2020-2045 RTP/SCS, which includes this project in its list of planned infrastructure projects and assumes that growth would be directed toward transit stations. Therefore, the project's potential for inducing population, housing, and employment growth has been previously anticipated and is accounted for in that document.
- AB 2097's elimination of parking requirements near transit, as well as other state housing incentives, aim to streamline housing development but do not require or directly create new housing or population growth. Instead, they provide flexibility for future development, which local governments must still approve based on local zoning, land use, and planning priorities. The project itself is not anticipated to exceed or drive growth beyond SCAG's projections because the South Bay area is already densely developed and planned for managed growth. Thus, the project is responsive to, but not directly responsible for, housing growth along the transit corridor.
- 22-74 The construction durations of the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option as described in Chapter 2, Project Description, of the Draft EIR have not changed. Construction of the LPA is expected to last for approximately six years, and is described in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR. While the overall construction duration accounts for the entire 4.5-mile corridor, work at any one location would typically last several months to a year, with crews moving progressively along the alignment. Therefore, construction activities impacting any single location would be limited in duration rather than continuous over the entire timeline. Additionally, the constraints within the Metro ROW would limit the amount of heavy-duty equipment that could operate simultaneously, which inherently reduces emissions intensity at any one location.

- To address air quality impacts during construction, the Draft EIR thoroughly assessed potential impacts on sensitive receptors using conservative modeling and SCAQMD’s mass daily regional thresholds and localized significance thresholds. Tables 3.4-15 and 3.4-18 of the Draft EIR summarize the regional and localized air quality impacts, demonstrating that emissions would remain below SCAQMD thresholds. The analysis used the most conservative localized significance threshold screening values due to the proximity of sensitive receptors at the edge of the Metro ROW. No potentially significant impacts to sensitive receptors were identified at either the regional or localized scale. Therefore, mitigation is not required under CEQA. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.
- 22-75 The comment incorrectly suggests that details regarding fugitive dust control measures are missing from the Draft EIR. Page 3.4-25 of the Draft EIR provides a comprehensive list of best available control measures that would be implemented in accordance with SCAQMD Rule 403 to reduce fugitive dust emissions during construction.
- 22-76 The comment inaccurately suggests that all three alignments would require mitigation for air quality impacts. Only the Trench Option was determined to have a potentially significant air quality impact during construction, which would require mitigation. All construction activities were appropriately included in the air quality analysis for each alignment, including relocation of existing tracks, excavation, and utility relocations.
- 22-77 As indicated in Table 3.7-4 of the Draft EIR, all special-status species with potential to occur within the RSA are categorized by their likelihood of presence: high, moderate, or low. Species with low potential to occur lack suitable habitat within the RSA and are, therefore, not expected to be present. The trees within the RSA do not provide suitable habitat for any special-status species, aside from birds and raptors protected by the MBTA. Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys on pages 3.7-34 and 3.7-35 of the Draft EIR requires preconstruction surveys to prevent impacts to nesting birds and raptors. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.
- Regarding monarch butterflies, their preferred overwintering sites and roosting trees, such as the nonnative blue gum eucalyptus (*Eucalyptus globulus*), native Monterey pine (*Pinus radiata*), and Monterey cypress (*Cupressus macrocarpa*), among other native tree species, are not known to occur in proximity to the RSA, and no known overwintering sites are located nearby. Consequently, impacts to Monarch butterfly habitat are not anticipated. See Table 3.7-3 of the Draft EIR for a comprehensive inventory of trees and shrubs located in the Metro ROW with potential for trimming or removal. Additionally, Section 3.7-5 outlines mitigation measures to avoid and minimize impacts on sensitive biological resources.
- 22-78 Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys, which requires nesting bird season restrictions and pre-construction surveys, complies with CEQA and is not improperly deferred. According to CEQA Guidelines Section 15126.4(a)(1)(B), specific details of mitigation measures may be developed after project approval when it is impractical to provide those details during environmental review, as long as the agency (1) commits to implementing the mitigation, (2) adopts specific performance standards, and (3) identifies feasible actions to meet those standards. Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys meets these requirements by committing to protective actions for nesting birds and

raptors, setting clear performance standards, and identifying types of actions to achieve the protection goals for nesting birds and raptors protected under the MBTA and the CFGC.

Under Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys, vegetation clearance or demolition of potential nesting sites would be restricted outside of the nesting season, when feasible, or require pre-construction nesting bird surveys by qualified biologists within four days prior to construction start during the nesting season. The mitigation measure establishes performance standards for buffer zones around active nests (150 feet for passerine birds and 300 feet for raptors) and identifies specific actions to avoid or minimize impacts, such as monitoring nests, establishing no-disturbance buffers, and using shielding or directed lighting to prevent light encroachment into nesting habitats. Additionally, Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys mandates real-time monitoring by qualified biologists who could modify construction activities to avoid or reduce potential impacts to nesting birds, thereby ensuring adaptive protection measures are in place to meet the established performance standards. This approach complies with CEQA by providing feasible, performance-based mitigation that is appropriate for addressing biological impacts during the construction period when active nesting may occur. Thus, the mitigation measure is not improperly deferred as it provides a comprehensive and enforceable plan to protect nesting birds, employing measures that are effective, feasible, and sensitive to the changing conditions of bird nesting activity.

- 22-79 The assessment of potential impacts to special-status species in the Draft EIR is based on a combination of established habitat evaluation methodologies, including visual field surveys and habitat assessments conducted in November 2020, as discussed in Section 3.7, Biological Resources, of the Draft EIR. These surveys involved both a windshield survey (from a vehicle) and a pedestrian survey (surveying on foot) throughout the RSA and included photographic documentation of all parks and open spaces, which are provided in Figure 3.7-2 through Figure 3.7-13 of the Draft EIR. Section 3.7-2 of the Draft EIR includes further information regarding the survey activities conducted that inform the Draft EIR.

This methodology is consistent with standard CEQA practices, which allow an initial evaluation of potential species presence based on habitat suitability rather than requiring protocol-level surveys for every individual species during the EIR phase. The habitat evaluation and literature review conducted for the Draft EIR identified species with a low, moderate, or high potential to occur within the RSA, based on existing conditions, documented occurrences, and regional habitat characteristics. For the plant species identified with a high potential to occur (Southern Tarplant), feasible mitigation measures are proposed to reduce or eliminate the impact, Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, MM-BIO-4: Pre-construction Rare Plant Survey that require conducting pre-construction surveys to verify presence and avoid or minimize impacts, if necessary, and MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat to identify appropriate sites for and to replant any Southern Tarplant impacted by the project.

- 22-80 The Draft EIR's conclusion that biological impacts would be less than significant with mitigation is based on a thorough evaluation of potential impacts and the implementation of specific mitigation measures to avoid harm to sensitive species. The Draft EIR appropriately distinguishes between potential impacts during construction and those during routine operational maintenance along the Metro ROW. Section 3.7-4.1.2 of the Draft EIR

explains that maintenance activities are not expected to result in significant impacts to biological resources, given the nature of these activities, the absence of routine disturbance to vegetation or trees that could support nesting birds, and the existing anthropogenic disturbance (e.g., vehicular traffic, train traffic, human presence) throughout the Metro ROW.

The referenced language regarding nest abandonment, failure, or mortality describes potential outcomes in the unlikely event that sensitive species were disturbed during the breeding season, but such an outcome is unlikely given the scope and character of Metro's light rail operations and associated maintenance. Routine maintenance activities conducted during project operation are limited in nature and do not typically involve vegetation removal or tree trimming that would affect nesting habitat. In the rare event that such work is required during the nesting season, maintenance activities would be performed in compliance with applicable rules and regulations of the California Department of Fish and Wildlife (CDFW), including those protecting nesting birds under the California Fish and Game Code. Routine maintenance work would be scheduled and carried out in a manner that avoids disruption to active nests, consistent with CDFW guidance. Given the limited potential for disturbance, existing anthropogenic disturbances, and the routine application of established biological avoidance protocols, the project would not result in significant impacts to nesting birds or other special-status species during operation.

- 22-81 See response to Comment 22-79 regarding the biological surveys conducted to inform Draft EIR. Other than the artificial sumps discussed in Section 3.7-3.3 of the Draft EIR, no other naturally occurring or created riparian or sensitive natural communities exist within the RSA. Only one sump (the Pioneer Basin in Torrance) is located adjacent to the Metro ROW, and it was constructed for flood control rather than as a natural ecosystem. As explained in Section 3.7-4.3.1 of the Draft EIR, the Pioneer Basins sump would not be impacted by project construction activities because it is situated on a bluff well above (in elevation) the Metro ROW. No impacts are anticipated to riparian fish or wildlife species due to the absence of suitable habitat within the RSA, and further detailed surveys for these species were not deemed necessary given the nature of existing conditions in the RSA.
- 22-82 See response to Comment 22-79 regarding the biological surveys conducted to inform the Draft EIR. As discussed in Section 3.7-3.4 of the Draft EIR, due to its urbanized nature and fragmentation of any remaining open space, no wildlife movement corridors are present within the RSA. Table 3.7-4 of the Draft EIR describes the potential for special-status species to occur, categorized as having high, moderate, or low potential. For species listed with a "low" potential to occur, there is insufficient suitable habitat to support their presence, leading to the conclusion that these species are "not expected" to occur within or near the RSA. Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys addresses the need for pre-construction nesting bird surveys for the MBTA covered species. For additional clarity, Table 3.7-4 of the Draft EIR was revised in Section 4.11, Corrections and Additions, of the Final EIR to describe that because of the lack of suitable habitat available, the species were categorized as "not expected." This revision reinforces the conclusions of the Draft EIR.
- 22-83 The purpose of environmental review under CEQA is to identify a project's potential impacts on the environment. Details on a project proponent's securing of a power purchase agreement does not constitute an impact on the environment. The Draft EIR addresses the project's anticipated electricity needs and the role of Southern California Edison (SCE) as the

energy provider in several sections. Section 3.12-4 of the Draft EIR evaluates the potential for the project to result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction and operation (see page 3.12-22 of the Draft EIR) and to conflict with or obstruct a state or local plan for renewable energy or energy efficiency (see page 3.12-27 of the Draft EIR). Additionally, page 3.4-37 of the Draft EIR discusses SCE's supply of electricity to the project, and page 3.5-19 of the Draft EIR discusses SCE's ongoing trajectory toward reducing reliance on non-renewable resources, consistent with California's renewable energy goals. Pages 3.11-9, 3.11-17, and 3.11-26 of the Draft EIR describe SCE's role as the project's electrical provider and the general methods by which electricity would be delivered to project components, including the traction power substation units and traditional distribution connection facilities (e.g., power poles, underground wires, transmission lines, and distribution lines).

Power purchasing agreements are typically arranged pursuant to established regional power grids and utilities. However, CEQA does not require that specific power purchasing agreements be in place prior to environmental review or project approval. Indeed, such an agreement might violate CEQA as CEQA requires environmental review to be completed prior to an agency's approval of a project. Should a power purchasing agreement with SCE be necessary, it would proceed through the California Public Utilities Commission (CPUC) as a separate, standard regulatory process. As described above, this CEQA analysis appropriately addresses energy impacts by assessing the project's energy needs and impacts and confirming SCE's supply capacity and California's commitment to renewable energy sources.

- 22-84 The language referenced on page 3.12-11 of the Draft EIR pertains to Metro's general energy conservation and management plans, policies, and initiatives which include plans for solar installations at various Metro facilities. This paragraph does not discuss project specifics, and the solar panels mentioned are not components of the project but are related to a different Metro project. The project does not include solar panels at this stage of the preliminary design.
- 22-85 The City states that mitigation measures would be needed in the event of an earthquake. Under CEQA, however, an EIR must analyze the project's impacts to the environment, rather than the environment's potential impacts on the project, unless the project would exacerbate existing hazards to create new risks. As described in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR, construction and operation of the project would result in no impact for increased risk of loss, injury, or death due to fault rupture, because the project doesn't traverse any fault zones. Additionally, there would be a less than significant impact for risk of loss, injury, or death involving strong seismic ground shaking during both construction and operation, due to the project's adherence to applicable seismic design standards. Modern engineering and construction practices would ensure that the project complies with seismic safety codes, which are designed to protect structures and users against seismic risks. The design and construction methods would also provide a safe working environment for workers. As a result, additional mitigation measures are not necessary under CEQA, as no substantial seismic risk impact to the environment has been identified.
- 22-86 As stated in Section 3.8, Geology and Soils, of the Draft EIR, the Elevated/At-Grade Alignment and Trench and Hawthorne Options are not located in earthquake-induced landslide zones. As shown in Figure 3.8-4, the nearest CGS mapped landslide zone is over

- 1.5 miles away. Therefore, the impact is less than significant. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.
- 22-87 Section 3.5, Greenhouse Gas Emissions, of the Draft EIR includes a comprehensive GHG emissions impact analysis, including short-term construction impacts and long-term operational impacts. This analysis includes baseline data, regulatory standards, and quantified emissions calculations, which demonstrate that the project would not generate significant GHG emissions. Therefore, there is no requirement to mitigate emissions. The project would reduce regional GHG emissions when considering the reduction of passenger vehicle trips associated with increased transit ridership. The LPA would follow the Metro ROW for the entire length of the project and would be entirely grade-separated. Thus, the LPA would result in similar VMT- and GHG-reduction benefits as the Elevated/At-Grade Alignment and Trench Option. The statement that building public transportation would reduce VMT is supported by the traffic and air quality models used, which are based on regional travel behavior patterns and supported by SCAG's RTP/SCS. Therefore, the project would result in a beneficial effect with regard to GHG emissions. For additional information regarding the Draft EIR's quantified VMT and emissions analysis, refer to response to Comment 22-68.
- 22-88 Metro acknowledges that the Lawndale Air Quality Management Plan and Climate Action Plan do not specifically reference a light rail system. However, both plans contain goals and policies that generally support enhanced public transit systems aimed at reducing emissions and dependence on single-occupant vehicles, as shown in Table 3.5-3 on page 3.5-10 of the Draft EIR. For example, Goal 2 of the City's Air Quality Management Plan states, "Reduce reliance on single-occupant vehicles and reduce the number of non-work and commuting trips." As discussed in response to Comment 22-87, the project would have a net positive effect on reducing GHG emissions by shifting trips from passenger vehicles to public transit. This beneficial GHG emissions effect is broadly consistent with GHG reduction plans.
- 22-89 See response to Comment 22-88.
- 22-90 See Section 3.5, Greenhouse Gas Emissions, of the Draft EIR. The methods to calculate emissions are described in detail in Sections 3.5-2.2 and 3.5-2.3 of the Draft EIR for both construction and operation, including the data used as well as the calculations performed.
- 22-91 Section 3.5-2.1 of the Draft EIR states the analysis of potential environmental impacts related to GHG emissions is the six-county geographic region under the jurisdiction of SCAG, which includes Los Angeles, Imperial, Orange, Riverside, San Bernardino, and Ventura Counties.
- 22-92 The greenhouse effect is a concept in atmospheric science that describes the process by which certain atmospheric gases, referred to as Greenhouse Gas Emissions (GHGs), absorb energy from sunlight within the Earth's atmosphere and prevent it from being released back into space. This mechanism is responsible for maintaining a warm, habitable environment on the planet's surface based on the equilibrium concentrations of the gases. As discussed on page 3.5-13 of the Draft EIR, GHGs, unlike localized air pollutants, contribute to climate change by affecting global atmospheric conditions (rather than directly impacting air quality at specific localized points). This is because GHGs have long atmospheric lifespans, and their emissions distribute and mix across large regions, even globally, rather than accumulating in concentrated areas. Consequently, evaluating GHG emissions at a regional level provides a more accurate and effective approach for assessing the potential climate-related impacts of

the project. A localized analysis would not yield meaningful distinctions in the context of the effects of GHG emissions.

- 22-93 The City appears to misunderstand the approach for analyzing GHG emissions. For construction-related GHG emissions, which are temporary by nature, the Draft EIR follows the SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (2008), which states that for CEQA assessments, construction-related GHG emissions that occur over a relatively short-term period should be amortized over a 30-year operational project lifetime. This approach reflects the fact that GHGs persist in the atmosphere long after they are emitted and contribute cumulatively to climate change over time, rather than having isolated, short-term effects like many other pollutants. Spreading out the temporary GHG emissions from construction over the project’s lifespan allows for a fair comparison with the long-term GHG reductions achieved through increased transit ridership, which lowers regional vehicle emissions overall. The GHG emissions impact analysis beginning on page 3.5-25 of the Draft EIR demonstrates that there would be a net decrease in GHG emissions due to the project. Therefore, there is no requirement to mitigate emissions, although compliance with Metro’s Green Construction Policy would further minimize emissions through the use of best management practices and low-emission equipment.
- 22-94 The comment correctly notes that clarification was needed regarding the construction timeline. Section 4.9, Corrections and Additions, of the Final EIR has been updated and correctly states the construction time period. As with any large-scale project, minor scheduling adjustments may occur. This update does not alter the conclusions of the Draft EIR regarding construction-related impacts.
- 22-95 The City questions the well-established link between expanded public transit options and regional GHG-emission reductions, as well as the expectation that this project would reduce VMT through increased transit ridership. This relationship is substantiated by the California Air Resources Board (CARB) and the California Office of Planning and Research (OPR), both of which affirm that expanding and improving transit options directly support climate change adaptation strategies by reducing dependence on single occupancy vehicles. CARB’s 2017 Climate Change Scoping Plan (2017) and the 2022 Scoping Plan for Achieving Carbon Neutrality (2022) describe this interconnected approach to transit and climate action. As discussed on page 3.5-20 of the Draft EIR, OPR’s Technical Advisory – CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review (2008) and the Discussion Draft CEQA and Climate Change Advisory (2018) provides similar guidance.

Further, as noted in Section 3.1, Transportation, of the Draft EIR, under CEQA Guidelines Section 15064.3(b)(2), transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact and do not require VMT analysis. OPR’s Technical Advisory on Evaluating Transportation Impacts in CEQA explains that transit and active transportation projects generally reduce VMT and, therefore, are presumed to cause a less than significant impact on transportation. This presumption extends to passenger rail projects, like this one, expected to reduce VMT.

Regarding vehicle trips to the stations, those trips would be outweighed by the net regional VMT and GHG reductions achieved by taking those vehicles off the road for the majority of each trip. This approach is widely supported, as illustrated by California SB 375, which links transportation and land use policy to climate goals by prioritizing VMT reductions through

- increased transit use. By enabling efficient public transit access, the project supports California’s climate adaptation goals and would have a beneficial impact on regional air quality and GHG emissions. See also response to Comments 22-63 and 22-68.
- 22-96 The operational parameters in the Draft EIR are based on the travel demand modeling performed for the project. This modeling is included in the 2023 Ridership Report, published concurrently with the Draft EIR. The report includes a description of the methodology to calculate VMT.
- 22-97 The City incorrectly asserts that the Draft EIR includes deferred mitigation measures to reduce GHG emissions. The GHG emissions impact analysis beginning on page 3.5-25 of the Draft EIR demonstrates that impacts would not be significant, and therefore, mitigation would not be required.
- Furthermore, as discussed on page 3.5-19 of the Draft EIR, annual GHG emissions associated with electricity consumption for the project were estimated by multiplying the total annual electricity demand in megawatt-hours by the forecasted 2042 SCE delivered power mix carbon intensity factor. According to SCE’s prepared forecasts of the projected carbon intensity of their future delivered power to customers, the GHG intensity factor in 2042 would be approximately 263 pounds of carbon dioxide equivalent per mega-watt hour. Thus, the Draft EIR’s analysis of GHG emissions associated with the project does not rely on assumptions of 100% renewable energy.
- 22-98 Page 3.5-20 of Section 3.5-2.4 of the Draft EIR accurately states that the SCAQMD has not adopted a CEQA significance threshold associated with GHG emissions from transit projects. The project would not affect the frequency of freight rail activity in the corridor or alter associated GHG emissions. Freight rail emissions would be identical under the existing and future conditions regardless of the project, as the project does not propose any changes to existing freight operations.
- Section 3.5-2.5 of the Draft EIR discusses the parallels of benefits associated with expanding transit infrastructure and reducing VMT and GHG emissions, based on the two OPR guidance documents described in the chapter.
- 22-99 It is unclear what wall the City is referring to. The analysis of construction-related GHG emissions considered all construction activities that would occur for the project.
- 22-100 Sections 3.5-3.1 and 3.5-3.2 of the Draft EIR discuss existing conditions associated with California GHG emissions and GHG emissions from the Metro transit system. This appropriately characterizes the existing condition given the statewide and regional nature of GHG emission effects and climate change.
- 22-101 The analysis is based on reliable data that captures realistic long-term ridership trends. Section 3.5-3.3 of the Draft EIR provides context on the COVID-19 pandemic’s effects on commuting and transit use patterns, acknowledging that transit ridership temporarily declined in 2020 and 2021 due to increased remote work and altered travel habits. The discussion notes a recovery in commute frequency and transit ridership, suggesting a gradual return to pre-pandemic patterns. The analysis relies on the best available transportation data to date, including projections from the University of California, Davis (2022). While the City suggests that long-term post-pandemic transit trends should be fully analyzed now, it is premature to reach definitive conclusions. The existing data offers a

strong foundation, and as the Draft EIR explains, current studies anticipate a continued return toward pre-pandemic levels. See MR-15: Metro Ridership Forecasting Methodology.

Given the unique and temporary nature of the COVID-19 pandemic, the analysis relied on pre-pandemic (2019) data to forecast emissions and ridership. As discussed on page 3.5-19 of Section 3.5, Greenhouse Gas Emissions, of the Draft EIR, implementation of the project would indirectly affect regional GHG emissions through the displacement of on-road vehicle trips and VMT, which is key and one of the primary tenets of GHG-emission-reduction strategies for the SCAG region. Regional transportation modeling was performed to estimate daily VMT on the roadway network under existing conditions (2019) and in 2042 with and without the project.

22-102 The City cites a table number that does not exist in the Draft EIR. For the purposes of this response, Metro assumes the intended reference is to Table 3.5-13, on page 3.5-26 of the Draft EIR, which presents the estimated GHG emissions associated with construction. This table intentionally does not include baseline GHG emissions for comparison to construction-related GHG emissions because, per SCAQMD staff guidance (discussed on page 3.5-26 of the Draft EIR), GHG impacts from construction should be amortized over a 30-year operational project lifetime, rather than directly compared to baseline emissions. This approach accounts for the inherently cumulative nature and long-term atmospheric persistence of GHGs. See response to Comment 22-93 for additional information regarding the construction-related GHG emissions analysis and SCAQMD guidance.

22-103 See response to Comment 22-103. The same methodology for construction-related GHG emissions impacts was applied for the Trench Option.

22-104 As discussed on page 3.5-19 of the Draft EIR, implementation of the project would reduce regional GHG emissions through a shift from passenger vehicles to public transit, thereby reducing VMT. This displacement of on-road vehicle trips is one of the primary tenets of GHG emissions reduction strategies for the SCAG region, as outlined in SCAG's 2020-2045 RTP/SCS. See response to Comment 22-95 regarding the well-established link between reduced VMT and GHG emissions reductions.

Table 3.5-16 of the Draft EIR summarizes annual average GHG emissions and shows the project would reduce GHG emissions compared to the baseline conditions. Therefore, no mitigation measures are needed. See response to Comments 22-63 and 22-68 regarding the Draft EIR's analysis of VMT reductions, as well as response to Comment 22-102 and MR-15: Metro Ridership Forecasting Methodology.

22-105 The comment misinterprets the scope and conclusions of the GHG emissions analysis in the Draft EIR, incorrectly asserting that no studies were conducted for the analysis. Section 3.5, Greenhouse Gas Emissions, of the Draft EIR, provides a thorough, quantitative analysis of GHG emissions that would be generated during both construction and operation of the project, which is summarized in Tables 3.5-13 and 3.5-16, respectively. This analysis includes projections based on established methodologies for construction emissions and considers the project's long-term role in reducing VMT by providing a high-quality transit alternative. The project's compliance with plans, policies, and regulations adopted to reduce GHG emission, such as Metro's Green Construction Policy, the 2019 Climate Action and Adaptation Plan, and the Moving Beyond Sustainability Strategic Plan, is fully documented and contributes to ensuring the project's consistency with these initiatives.

- The comment also inaccurately suggests that idling at rail crossings would lead to significant unmitigated GHG impacts. Any minor GHG emissions from vehicles idling at rail crossings would be negligible when compared to the significant reduction in GHG emissions from displaced vehicle trips regionwide. It should also be noted that the LPA (as well as the Trench and Hawthorne Options) would entirely eliminate this concern, as the light rail would be fully grade-separated, meaning that light rail operations would not interrupt vehicle traffic at crossings, avoiding any potential idling emissions at intersections.
- 22-106 The comment incorrectly asserts that the cumulative impact discussion in the Draft EIR lacks information on certain project elements, such as soundwalls and bridge widening. Section 3.5, Greenhouse Gas Emissions, of the Draft EIR assesses GHG emissions for the entire project, and all project components, including soundwalls, bridges, and other structures, were fully accounted for in the construction vehicle and equipment assumptions underlying the emissions calculations. GHG emissions are inherently cumulative, as they contribute to global climate change regardless of individual project elements. The Draft EIR explains this cumulative nature of GHG impacts on page 3.5-13. Therefore, the analysis appropriately addresses cumulative GHG emissions by evaluating all anticipated emissions associated with construction and operations of the project, consistent with CEQA.
- 22-107 The comment quotes SB 743. No response is required.
- 22-108 The environmental studies prepared during the Draft EIR phase meet CEQA's requirements for evaluating potential impacts from hazardous materials. A Phase I Environmental Site Assessment (ESA) was conducted to identify recognized environmental conditions (RECs), including the Allied Petroleum corporate well, which is documented in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR. This well is noted as a plugged and abandoned dry hole per California Energy Management Division (CalGEM) records, indicating it no longer poses significant environmental risks.
- The Phase I ESA performed for the Draft EIR provides sufficient information to assess the project's potentially significant impacts related to hazards and hazardous materials. Conducting a Phase II investigation, which includes soil and groundwater sampling to confirm the presence or absence of contamination identified in the Phase I ESA, is standard practice for the preliminary design phase of development projects and would be required per Metro's standard property acquisition requirements.
- 22-109 See MR-8: Light Rail and Freight Train Safety.
- 22-110 This comment reflects a policy-level disagreement regarding the interpretation of the land use goal cited by the comment. Additionally, the City is speculating, as no evidence is provided to support the claim that the project would diminish the area's aesthetic character and attractiveness; CEQA does not require an analysis of speculation. Metro's assessment indicates that the project would support local and regional objectives by enhancing public transit, reducing VMT, and improving air quality, thereby contributing positively to environmental quality, mobility, and public health. The project would also incorporate design elements to preserve and enhance visual character, as well as safety features to promote a safe urban community. The City's policy disagreement with the Draft EIR conclusions is noted and would be considered by the Metro Board during its deliberations on whether to approve the project. See MR-10: Changes to Community Character.

- 22-111 As a light rail extension, the project is consistent with the current transportation function of the Metro ROW and would not change the development patterns adjacent to it. The project is consistent with Policy 1a of the City's 1991 General Plan Land Use Element in that the project would maintain the existing Metro ROW for transportation use, which is distinct from introducing new development. Notably, at the request of the City of Lawndale provided during the 2018 Supplemental Alternatives Analysis outreach process, Metro removed a station within the City of Lawndale from further consideration, a decision which respects the City's land use goals and is consistent with Policy 1a by maintaining the transportation function of the Metro ROW without introducing new development density or high-traffic stations within Lawndale's residential areas. Stations are instead planned at the South Bay Galleria and Torrance TC. This approach supports both the City of Lawndale's land use goals and regional mobility objectives while preserving the residential character of the Metro ROW area within the city. For additional information, see MR-10: Changes to Community Character.
- 22-112 The City does not specify what is found to be false in the table.
- 22-113 As shown in Section 4.6, Corrections and Additions, of the Final EIR, the text of Table 3.2-2, of the Draft EIR, has been revised to state "City of Lawndale Zoning Regulations," the intended meaning. The revision does not change the analysis or conclusions of the Draft EIR.
- 22-114 See response to Comment 22-111.
- 22-115 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR, analyze the project's potential to physically divide communities and to affect visual resources within existing communities. As discussed in these sections of the Draft EIR, the project would result in less than significant land use and aesthetic impacts. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-10: Changes to Community Character. In addition, the LPA light rail guideway (as well as the Trench and Hawthorne Options) would be fully grade-separated from all roadways, further reducing the potential for physical division.
- 22-116 The comment appears to misunderstand the scope and nature of the project, as it does not include commercial or residential components. The project would extend the Metro C (Green) Line from the Redondo Beach (Marine) Station to the Torrance TC. Sensitive receptors, including residential areas within 350 feet of the alignment, have been carefully assessed for potential noise and vibration impacts in the Draft EIR. Where impacts were identified, appropriate mitigation measures have been proposed to reduce significant impacts to the maximum extent feasible. The LPA would result in less than significant operational noise and vibration impacts with mitigation. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.
- 22-117 See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-5: Vibration Impact Types and Impact Thresholds for more information.

The comment references the National Geographic Encyclopedia's statement on sound levels and hearing damage; however, this general information on noise levels and health impacts does not directly apply to the project's specific noise environment as analyzed in the Draft

EIR. The project noise levels from intermittent train pass-bys are significantly lower than continuous noise sources commonly associated with health impacts like hearing damage, such as prolonged exposure to industrial equipment or continuous loud music. The Draft EIR addresses relevant noise levels in Section 3.6, Noise and Vibration, noting that train noise would reach approximately 78 dBA at a speed of 50 mph, decreasing significantly when indoors. This level is below the Occupational Safety and Health Administration (OSHA) continuous exposure threshold of 85 dBA, which is based on protecting against hearing loss from prolonged, uninterrupted noise.

Furthermore, unlike persistent or continuous loud noises, which National Geographic highlights as problematic, transit-related noise is brief and intermittent. Even during peak service times, when trains pass every five minutes, the equivalent hourly noise level (63.7 dBA) remains substantially below the OSHA threshold, indicating no risk of hearing damage. The project also includes mitigation measures to reduce noise impacts to sensitive receptors, including soundwalls and quiet zones, further addressing potential disturbances.

- 22-118 The comment mischaracterizes the Draft EIR analysis. The FTA Noise and Vibration Impact Assessment Manual identifies the potential for “wheel squeal” on curves with a radius of less than 1,000 feet. Noise associated with the steel wheels rolling on steel rails is included in the operational noise calculations, as discussed on page 3.6-46 of the Draft EIR. The Draft EIR utilizes the FTA Noise and Vibration Impact Assessment Manual’s standards, which account for all noise sources associated with train movement, including steel wheel noise. Maintenance of vehicle wheels and tracks would be part of Metro’s standard operation and maintenance protocols to ensure proper functioning of the transit line. The Metro ROW alignments, including the LPA, through the City of Lawndale do not include any small-radius curves with a radius of less than 1,000 feet, and therefore, wheel squeal is not expected in this area. However, Metro remains committed to minimizing potential noise impacts. As final engineering progresses, Metro would continue to evaluate track conditions and noise mitigation needs, consistent with Section 4.2.12.3 of the Metro Rail Design Criteria, which requires lubricators in locations where wheel squeal or excessive wheel wear is anticipated. Should it be determined that rail lubricators are warranted, they would be incorporated into the project accordingly. For the Hawthorne Option, as discussed on page 3.6-76 of the Draft EIR, Mitigation Measure MM-NOI-5: Wheel Squeal Monitoring would be implemented to reduce the potential impact of wheel squeal for that option to a less than significant level.
- 22-119 Soundwalls were thoroughly considered in the Draft EIR under Mitigation Measure MM-NOI-2: Soundwalls, and in the analysis set forth in Section 3.6-6, Project Impacts Remaining After Mitigation. The locations of the proposed soundwalls are shown in Figures 3.6-21 through 3.6-24 of the Draft EIR, and described in Tables 3.6-26, 3.6-31, and 3.6-33, for the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option, respectively. The effectiveness of these soundwalls is discussed in detail on pages 3.6-100 (Elevated/At-Grade Alignment), 3.6-103 (Trench Alignment), and 3.6-104 (Hawthorne Option). The locations and effectiveness of the proposed soundwalls for the LPA are described in Section 4.21, Corrections and Additions, of the Final EIR. No new soundwalls beyond those already described in the Draft EIR as part of the Elevated/At-Grade Alignment or Trench Option are required for the LPA. See also response to Comment 22-45, regarding the analysis of aesthetic impacts of the proposed soundwalls.
- 22-120 See MR-5: Vibration Impact Types and Impact Thresholds.
- 22-121 See MR-5: Vibration Impact Types and Impact Thresholds.

- 22-122 As described in Mitigation Measure MM-NOI-4: Quiet Zone Establishment on page 3.6-97 of the Draft EIR, the Quiet Zone implementation would eliminate freight horn sounding at freight crossings from north of Inglewood Avenue to south of 182nd Street, including 159th Street, 160th Street, 161st Street, 162nd Street, and 170th Street, within the City of Lawndale. This mitigation measure was analyzed for its noise-reducing effects at these crossings, as described on page 3.6-50 of the Draft EIR. Chapter 2, Project Description, of the Draft EIR describes the types of “quiet zone ready” equipment proposed, consistent with the Federal Railroad Administration (FRA) criteria for quiet zones. This would include the use of “supplemental safety measures” (SMMs) established by FRA to ensure that safety at crossings is maintained without the need for horn sounding. Figures 3.6-21 and 3.6-22 of the Draft EIR show the crossings where freight horn noise was excluded from the noise impact calculations, reflecting the impact of the Quiet Zone implementation on noise reduction. Therefore, the implementation of a Quiet Zone and the associated noise impact reductions have been thoroughly evaluated, and no further analysis is required to determine the efficacy of a Quiet Zone as a noise mitigation measure.
- 22-123 The Noise Control Plan in Mitigation Measure MM-NOI-1: Noise Control Plan is not deferred mitigation, as it sets clear, enforceable requirements that the contractor must follow to ensure compliance with the specific performance standards (i.e., FTA criteria) set forth in the measure. Per Mitigation Measure MM-NOI-1: Noise Control Plan, prior to starting localized construction, Metro’s contractor must prepare the Noise Control Plan, which a board-certified engineer must design to meet the FTA 1-hour  $L_{eq}$  noise standards for different land uses. These standards include limits of 90 dBA  $L_{eq}$  for residential areas during the day and 80 dBA  $L_{eq}$  at night, and 100 dBA  $L_{eq}$  for commercial and industrial areas both day and night. The Noise Control Plan must provide specific noise-reducing actions, such as utilizing noise-reducing equipment, temporary noise barriers, and routing construction traffic away from sensitive residential streets. The plan must require pre-construction noise assessments and continuous noise monitoring to ensure compliance with FTA standards. Additionally, the contractor must establish a public complaint system to address any concerns within 24 hours, thus providing an additional layer of accountability. These requirements ensure construction noise impacts are managed in a highly controlled and systematic way to meet the quantified FTA noise criteria. Accordingly, Mitigation Measure MM-NOI-1: Noise Control Plan is not deferred mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures.
- 22-124 The City appears to confuse vibration-related mitigation with construction noise impacts. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys specifically addresses potential vibration impacts, not noise, and is intended for the protection of nearby structures. As noted in Section 3.6, Noise and Vibration, of the Draft EIR, this measure applies to construction activities for the Elevated/At-Grade Alignment along the Metro ROW near Grant Avenue, where there is one structure with potential for vibration-related structural impacts during construction of a new freight bridge. In addition, it should be noted that the LPA would not shift freight tracks in this area and would not require a new freight bridge to be constructed. Thus, the LPA would not result in construction vibration impacts with the potential for structural damage.
- 22-125 The Draft EIR analyzes the combined noise impacts from the light rail and freight operations. Mitigation measures are included in Section 3.6-5 of the Draft EIR that would address noise from the combined freight and light rail operations. Page 3.6-50 of the Draft EIR evaluates

- the effectiveness of the mitigation at reducing the combined impacts of freight and light rail operations. See MR-3: Operational Noise Project Features and Mitigation Measures for additional detail on the proposed noise mitigation measures.
- 22-126 The City states that the Draft EIR does not follow CEQA requirements for analyzing population and housing impacts generated by the project. CEQA requires analysis of population and housing impacts primarily in the context of growth-inducing impacts, which are addressed in Section 3.16-1 of the Draft EIR. The project is consistent with regional plans and is not expected to induce unplanned growth that would exceed SCAG's previously anticipated demographic forecasts. See response to Comment 22-73 for additional information regarding growth-inducing impacts.
- 22-127 See MR-14: Property Values and Impacts to Businesses. The comment states that studies show that property values near rail lines are negatively impacted but does not cite any specific study supporting this conclusion.
- 22-128 See MR-18: Homelessness, which includes information regarding Metro's "Response to Homelessness Motion." CEQA requires analysis of potential physical changes to the environment directly or indirectly resulting from a project, but it does not require a speculative assessment of potential social impacts. While the City associates light rail transit with attracting individuals experiencing homelessness, this is not a direct environmental impact of the project itself, nor does it require the construction of new homeless shelters. The presence or movement of individuals near transit facilities is influenced by broader social and economic factors beyond the scope of this project. Moreover, light rail projects, such as this one, typically include security measures, as noted in MR-9: Light Rail Security, designed to maintain the safety and accessibility of transit facilities. Ultimately, no substantial evidence suggests that the project would increase unhoused populations in a way that would cause significant physical environmental changes under CEQA.
- 22-129 The City references 49 Code of Federal Regulations (C.F.R.) Section 38.85, which is a federal regulation adopted pursuant to the Americans with Disabilities Act (ADA). While the Draft EIR does not include an exhaustive list of all design criteria, the project would be required to comply with all applicable federal, state, and local regulations, including federal regulations related to ADA-compliant design features for light rail transit systems. Specific design measures to prevent inadvertent entry between cars, such as barriers, warning devices, or other ADA-compliant features, would be incorporated as part of the project's final design phase, follow the relevant regulatory standards to ensure safety and accessibility for all passengers, and verified as part of the planning process.
- 22-130 Although the Draft EIR does not include an exhaustive list of all design criteria, the project would be required to be designed in accordance with all applicable regulations and design criteria, including those related to fire protection. It should also be noted that the project is not an underground light rail system. Compliance with applicable fire protection standards, which would be verified during the planning process, would ensure that all necessary fire protection systems and procedures are implemented.
- 22-131 See MR-12: Emergency Access and response to Comment 22-5. As described on page 3.15-32 of the Draft EIR, Metro recognizes that temporary roadway closures may be required during construction activities, which could impede the vehicle circulation network, including emergency access. However, as noted on page 3.1-15, Project Feature PF-T-1: Construction Traffic Management Plan requires Metro to coordinate with local agencies, including

emergency service providers, to maintain emergency access to nearby land uses. Therefore, the project would not significantly impact emergency services during construction.

Both the Trench Option and the LPA would fully grade separate the light rail within the Metro ROW, meaning that the light rail would operate independently from the roadway network. This separation would avoid potential congestion at arterial crossings, such as Inglewood Avenue and Manhattan Beach Boulevard, ensuring that operational wait times for emergency vehicles are unaffected by the LPA.

22-132 See MR-12: Emergency Access and response to Comments 22-5 and 22-131.

22-133 The City cites findings from a Blue Zones study that are not directly related to the project, the Draft EIR, or the CEQA analysis. The project does not include widening roads to increase vehicle capacity or raising speed limits. Any roadway modifications would be limited to those necessary to implement the light rail transit system. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

22-134 Chapter 2, Project Description, of the Draft EIR, describes various enhancements that Metro has committed to incorporating as part of the project, including the addition of multi-use recreational paths and the installation of quiet zone equipment at existing freight crossings along the Metro ROW. These enhancements go beyond the basic operational requirements of the project and would provide added value to the communities the project would serve. While CEQA primarily focuses on identifying and mitigating potential environmental impacts rather than cataloging public benefits, these community-focused improvements reflect Metro's ongoing efforts to deliver positive outcomes to affected communities whenever possible as a part of its projects.

22-135 The Draft EIR thoroughly evaluates potential transportation impacts, including impacts to pedestrian and bicycle facilities and safety hazards, with particular consideration for nearby schools. Section 3.1, Transportation, of the Draft EIR, evaluates these impacts and describes infrastructure enhancements that would improve safety at railroad crossings along the Metro ROW, going above and beyond the existing warning devices for the freight rail line. See MR-8: Light Rail and Freight Train Safety for more information regarding safety infrastructure improvements that would be implemented as part of this project. With respect to the City's concerns about the effect of light rail operations on children's health, learning environments, and daily routines, the Draft EIR addresses these topics across several environmental issue areas. For example, potential health impacts from air quality, noise, and hazardous materials are addressed in Section 3.4, Air Quality, and Section 3.9, Hazards and Hazardous Materials; potential impacts related to noise are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The analyses in these sections reflect applicable regulatory requirements and include mitigation measures, where necessary, to reduce impacts. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

The LPA—similar to the Trench Option and Hawthorne Option—would fully grade separate the light rail from all roadway crossings, ensuring that light rail operations do not interact with road traffic, pedestrians, or cyclists at grade level.

22-136 The City raises concerns regarding the analysis of traffic impacts on local roadways and Caltrans freeways. However, as noted in MR-11: Traffic Delay and Level-of-Service and response to comment 21-2, "traffic impacts," as measured by intersection delay and level of service (LOS), are no longer considered an environmental impact criterion. Nonetheless,

these issues were evaluated in Metro's separate 2023 Transportation Detail Report, published online concurrently with the Draft EIR. That report addresses roadway and intersection conditions along and intersecting with the Proposed Project and its Options. The commentor also references Interstate 405 (I-405), although the project does not intersect with or restrict access to or from this freeway. The project would provide a high-capacity and fast transit option that would attract riders to the Metro rail network and reduce driving on local and regional roadways. The Draft EIR adheres to the CEQA Guidelines' updated transportation impact criteria, including vehicle miles traveled (VMT).

22-137 See MR-1: Selection of Alternatives.

Figure ES-15 of the Draft EIR shows an at-grade light rail segment within Lawndale, but this segment does not have any at-grade light rail crossings. Therefore, the Draft EIR accurately describes grade separations. No changes were made in the Final EIR in response to this comment. Regarding effects on intersections, see MR-11: Traffic Delay and Level-of-Service.

22-138 See MR-11: Traffic Delay and Level-of-Service.

22-139 The City is mistaken in stating that the Draft EIR identifies traffic impacts as significant and unavoidable. As shown in Table ES-2 of the Draft EIR, no significant and unavoidable transportation impacts were identified. The Draft EIR follows CEQA's required transportation impact methodologies, focusing on VMT rather than traditional intersection delay metrics, consistent with CEQA and the CEQA Guidelines. Using these methodologies, the analysis concludes that the Elevated/At-Grade Alignment and Options would have less-than-significant transportation impacts. Under CEQA, the lead agency evaluates alternatives and mitigation where impacts are deemed significant. However, because transportation impacts were determined to be less than significant, feasible mitigation measures or alternatives are not necessary to reduce traffic-related impacts. Similar to the Elevated/At-Grade Alignment, the transportation impacts of the LPA would be less than significant. See MR-11: Traffic Delay and Level-of-Service.

22-140 The City quotes *Sierra Club v. Gilroy City Council (6th Dist. 1990) 222 Cal.App.3d 30, 41*, which, in turn, quotes Section 21002 of the Public Resources Code. As noted in response to Comment 22-139, CEQA does not require lead agencies to adopt mitigation measures or alternatives for impacts that are determined to be less than significant. Where the Draft EIR identifies potentially significant impacts, it also identifies mitigation measures and/or alternatives to reduce or avoid those impacts.

22-141 See response to Comment 22-139. Although none of the potentially significant impacts identified in the Draft EIR relate to transportation, the Draft EIR does identify other significant and unavoidable impacts. These are summarized in Section 3.16-3. Should the Metro Board determine to approve the project, the Board would be required to adopt CEQA Findings of Fact and a Statement of Overriding Considerations, as required by Public Resources Code Section 21081.

22-142 The project objectives outlined in Chapter 2, Project Description, of the Draft EIR, are centered on providing high-capacity, sustainable transit solutions in the South Bay to improve mobility, reduce congestion and air pollution, and enhance regional connectivity. These objectives emphasize improved transit access, reduced VMT, and increased connectivity within the South Bay, specifically along the corridor between the current terminus at the Redondo Beach (Marine) Station and Torrance. Meeting these objectives necessitates a project scale that could effectively serve the high demand for transit in this

dense urban area and support meaningful mode shifts from single-occupant vehicles to transit options.

Chapter 4, Evaluation of Alternatives, of the Draft EIR, evaluates a reasonable range of potentially feasible alternatives that were specifically chosen to meet most of the basic project objectives while also substantially reducing or avoiding one or more significant impacts. This range includes the No Project Alternative (required pursuant to CEQA Guidelines Section 15126.6(e)), the High-Frequency Bus Alternative, and the LPA.

The comment suggests that a “smaller scale” alternative should be evaluated. However, the High-Frequency Bus Alternative does reflect a scaled-down approach to the project that still meets many of the project objectives. This alternative would utilize high-frequency bus service rather than light rail, helping to achieve the project’s core objectives, such as improving mobility within the South Bay and transit accessibility and providing an alternative mode of transportation for commuters by providing a transit option, with reduced potential for environmental impacts. As described in Section 4.5-2 of the Draft EIR, the High-Frequency Bus Alternative would result in a less-than-significant impact for all assessed topics.

Although not necessarily a “smaller scale” alternative, the LPA was identified as particularly effective in reducing certain impacts associated with the Elevated/At-Grade Alignment, specifically operational noise and construction vibration impacts. The LPA incorporates a trench design between 170th and 182nd Streets, which significantly reduces operational noise impacts to nearby sensitive receptors, resulting in a less-than-significant impact with mitigation. This alternative also eliminates the need to relocate the freight bridge at Grant Avenue, reducing the potential construction-related vibration impacts to nearby structures. Although the Elevated/At-Grade Alignment would have a less-than-significant impact regarding emergency access, the LPA eliminates this concern entirely, because it would not have any at-grade intersection crossings.

By evaluating these alternatives, the Draft EIR provides decision-makers and the public with a reasonable range of potentially feasible project alternatives that would avoid or substantially reduce one or more of the project’s significant impacts while achieving most of the basic project objectives. Thus, the Draft EIR is consistent with CEQA, including CEQA Guidelines Section 15126.6.

22-143 See response to Comment 22-142.

22-144 The project objectives, as presented in Chapter 2, Project Description, of the Draft EIR, were crafted to allow a reasonable range of alternatives to be evaluated, consistent with CEQA Guidelines Section 15126.6. The objectives are intentionally framed without overly narrow parameters, for example, they do not specify a required project size or footprint, so that alternatives with different characteristics could still be evaluated for their potential to meet most of the project’s basic objectives.

The Draft EIR does consider off-site locations. The High-Frequency Bus Alternative would operate within existing roadways and would not utilize the Metro ROW (see Draft EIR Section 4.4-2; Figure 4.4-1). The Hawthorne Option, evaluated throughout the Draft EIR, would leave the Metro ROW to run along Interstate 405 (I-405) between Inglewood Avenue and Hawthorne Boulevard, and follow Hawthorne Boulevard south between 162nd and

190th Street (see Draft EIR, Figure 2.3-24). However, off-site locations outside this corridor would not fulfill the primary project objective of providing high-capacity transit service in the South Bay. For information regarding alternatives that were considered but eliminated from further evaluation in the Draft EIR, see Chapter 4, Evaluation of Alternatives, of the Draft EIR, as well as the 2023 Alternatives Considered and Eliminated Report, which was published concurrently with the Draft EIR and made available on the project website.

- 22-145 The Draft EIR provides a detailed review of the relevant policies in the City of Lawndale’s General Plan Circulation and Safety Elements that were in place at the time of the Draft EIR and comment letter’s issuance. This analysis, which begins on page 3.1-9 of the Draft EIR, explains how the project is consistent with the approach to each community’s adopted plans and summarizes the relevant transportation policies that the project may affect. For example, the Circulation Element Policy 4A is to “Reduce daily and peak hour vehicle trips,” and Policy 5D is to “Work with regional transportation agencies to plan and implement a commuter rail system ...” Given the Circulation Element was written in 1991, the precise language of “commuter rail system” is somewhat more specific than what has evolved since that time to become a regional rail network. However, the policies are clearly intended to facilitate greater use of public transportation. The project would also enhance transportation safety by including infrastructure improvements, including new pedestrian crossings with enhanced safety features, along the Metro ROW.

Although not directly relevant to the comment, it should be noted that in December 2023, after the close of the public comment period on the Draft EIR, the City of Lawndale adopted a General Plan Update, which replaces the General Plan that was in place when the comment was written. Metro has reviewed the General Plan Update and identified no inconsistencies. The updated Mobility Element includes policies to support the reduction of VMT and the provision of public transit, including Policy M-3.2, which directs the City to link activity centers, public facilities, and schools to transit and active transportation facilities; Policy M-5.3, which requires new developments to construct, when appropriate, transit facilities; and Policy M-5.4, which requires the City to work with Metro to ensure C (Green) Line service (including headways and service hours) are sufficient to meet the needs of transit commuters to and from Lawndale. Additionally, “Action Item” M-5b of the General Plan Update requires the City to work with Metro to increase transit service frequency, speed, and reliability and increase ridership to strengthen linkages and access to the C line rail stations. For additional information regarding the project’s consistency with the Lawndale General Plan, see MR-10: Changes to Community Character.

- 22-146 The comment states that the Draft EIR should include a Traffic Operations Study. Traffic operations and associated metrics such as traffic delay and LOS are no longer allowable CEQA transportation impact criteria under State of California requirements. However, a separate 2023 Transportation Detail Report, published concurrently with the Draft EIR, and is available in the “Project Filing Cabinet” on Metro’s website for the C Line Extension to Torrance. That report details the traffic operations effects of the alternatives and options. See MR-11: Traffic Delay and Level-of-Service.
- 22-147 While the City’s 1991 General Plan Circulation Element and 2015 General Plan Safety Element include policies that refer to LOS, as of 2020, intersection LOS is no longer a considerable criterion under CEQA for the determination of environmental impacts. However, these conditions were evaluated in a separate report. The City of Lawndale’s General Plan Update (adopted in December 2023) reflects these changes in state law

- focusing on transportation planning and reducing VMT. For instance, Policy M-9.1 requires the City to use a VMT analysis for the purposes of environmental review under CEQA, though, for the purposes of planning and designing street improvements, the City shall continue to maintain LOS standards. See response to Comment 22-146 and MR-11: Traffic Delay and Level-of-Service.
- 22-148 See response to Comment 22-147.
- 22-149 The Draft EIR provides detailed information and analysis on the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option, including the traffic and transportation impacts associated with each option. The comment does not detail what information the City considers incomplete or missing. The Draft EIR was prepared in accordance with CEQA requirements for a thorough environmental impact analysis and includes sufficient information to facilitate meaningful public review and comment.
- 22-150 In accordance with CEQA, including AB 52, Metro proactively initiated consultation with tribal representatives identified by the Native American Heritage Commission (NAHC) to seek input on potential tribal cultural resources within the project area. On February 2, 2021, initiation letters were sent via both mail and email to the seven individuals identified by the NAHC. In order to ensure effective communication, Metro sent follow up emails on February 12, 2021, to confirm working email addresses, requesting written consultation responses. One response was received. Specifically, on March 5, 2021, Adrian Morales responded, via email, that the Gabrielino Tongva San Gabriel Band of Mission Indians would like to participate in the consultation process and stated that the tribe would contact Metro with formal recommendations. Following this, Metro engaged in ongoing efforts to maintain communication and request formal recommendations, with follow up emails sent on May 10, 2021, May 25, 2021, July 12, 2021, July 29, 2021, and October 27, 2021. These multiple contacts were made to ensure that the tribe had ample opportunity to participate in the consultation. A virtual consultation meeting took place on July 27, 2023, in which Adrian Morales and the Metro Team discussed concerns related to natural and cultural resources in/near the project area and provided feedback on project mitigation measures.
- 22-151 As discussed throughout the Draft EIR, the project would be designed in accordance with all applicable regulations and design criteria, including those of the CPUC (e.g., see pages 2-27, 3-6.10 to 3.6-11, 3.6-21 to 3.6-22, 3.6-47, 3.11-2 to 3.11-3, 3.15-2 to 3.15-3, 3.15-31 to 3.15-33, and 3.16-9 of the Draft EIR).
- 22-152 Section 3.11, Utilities and Service Systems, of the Draft EIR, includes details on utility relocations, including those required for the Hawthorne Option. Project Feature PF-US-1: Utility Identification and Coordination on page 3.11-10 of the Draft EIR ensures proper utility identification and coordination prior to construction activities. As per Metro standard practice, prior to the start of any demolition or construction activities, the construction contractor would verify the locations of existing utilities potentially affected by construction activities through thorough coordination with utility providers for all wet and dry utilities (e.g., water, sewer, gas, electric, and telecommunications). This coordination would include obtaining documentation of existing utility locations and conducting field verification methods, such as potholing and geotechnical investigations. Based on these investigations, the contractor would coordinate with the respective utility providers to determine the necessary setbacks, protections, or relocations for each utility line, including stabilization measures for high-voltage power lines near the freeway in the Hawthorne Option. This process would ensure that all utility relocations or protections are fully assessed and

implemented, preventing impacts on essential services and infrastructure. See also MR-7: Utility Relocation and Hazardous Materials Safety.

- 22-153 The City of Lawndale’s feedback and concerns are noted and would be considered by the Metro Board prior to it taking action on the Final EIR and the project. The Draft and Final EIR have been prepared in compliance with CEQA. The Final EIR addresses all comments submitted during the Draft EIR comment period and includes revisions and corrections, where appropriate, to amplify or clarify the information presented in the Draft EIR. Metro would continue coordination with the City of Lawndale and all other local jurisdictions.

**Submission 60 Immanuel Chiang, Los Angeles County Sheriff’s Department**

- 60-1 As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan requires contractors to develop a Construction Traffic Management Plan (CTMP) with Metro, which would be submitted to all jurisdictions for review, including the Sheriff’s department and other first responder agencies.

**Submission 82 Elaine Lee, Caltrans District 7 Division of Environmental Planning**

- 82-1 Metro acknowledges Caltrans’ authority and jurisdiction over the listed facilities and would complete encroachment permits as required. The Hybrid Alternative was selected as the LPA; see MR-1: Selection of Alternatives.
- 82-2 As shown in Section 4.3, Corrections and Additions, of the Final EIR, Table 2.6-1 of the Draft EIR was revised to include discretionary actions for local jurisdictions.
- 82-3 The use of the term “Bicycle Facilities” is intended to be consistent with the use of “Pedestrian Facilities” within Section 3.1, Transportation, of the Draft EIR. On page 3.2-32 of the Draft EIR, the first sentence explains what is intended to be included in the discussion of “bicycle facilities” and does not denote racks, storage, showers, etc. No revisions were made in the Final EIR in response to this comment.
- 82-4 According to the California Vehicle Code (CVC) Div 11 Article 4, people riding bicycles have, “all the rights and [are] subject to all the provisions applicable to the driver of a vehicle by this division.” Therefore, unless otherwise expressly prohibited by posted signage, bicyclists are permitted to operate on major roadways including Hawthorne Boulevard. Riding bicycles on sidewalks is addressed in the CVC Part 21206: “This chapter does not prevent local authorities, by ordinance, from regulating the... operation of bicycles on pedestrian or bicycle facilities,” meaning local jurisdictions have the authority to permit or deny bicyclists from riding on sidewalks. The City of Lawndale prohibits sidewalk riding. The City of Redondo Beach prohibits sidewalk riding where signs are posted. The City of Torrance prohibits sidewalk riding within business districts or adjacent to destinations such as churches and schools.
- 82-5 Page 3.2-32 of the Draft EIR already defines “bike lane” as Class II and “bike route” as Class III. No revisions were made in the Final EIR in response to this comment.
- 82-6 It is presumed the commentor refers to the California Department of Transportation Director’s Policy DP-37 dated December 7, 2021 regarding Complete Streets, which states, “all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved.” The directive is

intended for projects “funded or overseen by Caltrans,” which this project is not. However, the project would not preclude Caltrans from carrying out the Complete Streets Directive for projects it funds or oversees, including those on Hawthorne Boulevard. The project includes Complete Streets-supportive elements, such as the implementation of new signalized pedestrian crossings that reduce the interval between safe crossings on Hawthorne Boulevard between residential and retail land uses. No revisions were made in the Final EIR in response to this comment.

- 82-7 Section 3.1-4.1 of the Draft EIR has been revised as requested in Section 4.5, Corrections and Additions, of the Final EIR. The rephrasing does not change the meaning or conclusions of the Draft EIR.
- 82-8 See response to Comment 82-6.
- 82-9 Section 3.1-4.1 of the Draft EIR has been revised as requested in Section 4.5, Corrections and Additions of the Final EIR. The rephrasing does not change the meaning or conclusions of the Draft EIR.
- 82-10 Section 3.1-4.1 of the Draft EIR has been revised as requested in Section 4.5, Corrections and Additions, of the Final EIR. The rephrasing does not change the meaning or conclusions of the Draft EIR.
- 82-11 The reference has been revised in Section 4.5, Corrections and Additions, of the Final EIR, to read “discussed in Appendix 3.2-A, Transportation Policy Analysis.” The revision does not change the meaning or conclusions of the Draft EIR.
- 82-12 There are approximately eight pairs of bus stops located along Hawthorne Boulevard within the area to be directly affected by construction. Because construction would be phased to minimize disruption to Hawthorne Boulevard, not all bus stops would be temporarily closed or relocated simultaneously, but there is the possibility that more than one bus stop on the same side of the road, or on opposite sides in the same segment, could be closed or relocated during the same period. It is probable that each of these bus stops would need at least some period of closure or relocation during construction.
- 82-13 The first sentence of Section 3.2-4.3.2 of the Draft EIR states, “Proposed Project construction would introduce partial and full street closures.” Appendix 2-A, Select Advanced Conceptual Engineering Drawings of the Draft EIR, pages 180 to 211, show the Hawthorne Option traffic handling and staging plans. As described in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR construction is anticipated to be staged in three phases to first modify Hawthorne Boulevard lanes, construct the light rail guideway, and then complete median work. Construction would be phased to minimize full closures and maintain access to all driveways during business hours. However, these staging plans were developed to support a conceptual level of design, and the precise nature and phasing of construction is not known or required to be determined during preparation of the EIR.
- Preceding the initiation of localized construction activities for the project, Metro and its contractors would coordinate with relevant authorities, including Caltrans, following standard practices and procedures, to secure permits for construction and coordinate plans for when and how many lanes would be closed.
- 82-14 All proposed alignments would require some non-residential permanent parcel acquisitions. Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR includes

- ROW sheets that depict the parcels that would be permanently or temporarily acquired. Section 3.2-4.1.1 of the Draft EIR states that the parcel acquisitions are additional compared to the Elevated/At-Grade Alignment and Trench Option. Additional text has been added in Section 4.6, Corrections and Additions, of the Final EIR to clarify that these acquisitions would not result in land use impacts.
- 82-15 See response to comment 82-14. Metro published several non-CEQA reports alongside the Draft EIR. These reports present information that is not required under CEQA, but supports the project’s decision-making process. Therefore, the Draft EIR does not mention the non-CEQA reports.
- 82-16 See response to Comment 82-13.
- 82-17 See response to comment 82-13. Temporary closures for construction would not fully preclude access to adjacent land use, although the exact nature of the disruption and temporary accommodations to maintain access cannot be known during the EIR phase. In similar past projects, Metro and its contractors have coordinated with local businesses and residents as well as relevant jurisdictions to manage access and the effects of temporary closures and identify reasonable accommodations or alternatives, which could include limiting construction hours, providing alternate routes or temporary easements, or other strategies. These are identified as part of the preliminary engineering work, and updated as necessary prior to the initiation of localized construction activities, in the development and implementation of the CTMP, which is described as Project Feature PF-T-1: Construction Traffic Management Plan in the Draft EIR.
- 82-18 As discussed in Section 3.2, Land Use and Planning, of the Draft EIR, the Hawthorne Option would not physically divide the community as the light rail is grade-separated from the street allowing for vehicles, pedestrians, and cyclists to access the surrounding neighborhood; it would not eliminate access or alter the street grid. In terms of visual impacts, as discussed in Section 3.3, Aesthetics, the elevated guideway would run parallel to the Interstate-405 Freeway, and it would generally have a similar scale and massing to surrounding structures. In addition, the components of the Hawthorne Option would be designed to comply with applicable design standards and would incorporate architectural treatments and landscaping to provide a unified design. Furthermore, it would not block long range views of any prominent visual features.
- 82-19 The analysis on Page 3.2-25 of the Draft EIR states that the project would “comply with all applicable regulations and local ordinances governing construction activities.” No revisions were made in the Final EIR in response to this comment.
- 82-20 The table heading in Table 3.2-5 of the Draft EIR has been revised as suggested in Section 4.6, Corrections and Additions, of the Final EIR. The revision is editorial in nature and does not change the meaning or conclusions of the Draft EIR. A separate appendix was not created, as Table 3.2-5 summarizes the land use plan/policy consistency analysis, appropriately supporting the impact analysis contained in Section 3.2, Land Use and Planning, of the Draft EIR.
- 82-21 Table 3.2-5 of the Draft EIR has been revised to state that there would not be conflicts with land use patterns, within Section 4.6, Corrections and Additions, of the Final EIR. The project would require limited permanent property acquisitions, but they would not conflict with other uses in the surrounding area or create land use incompatibilities.

- 82-22 Project Feature PF-AES-2: Metro Design Standards specifically describes Metro design standards and therefore was not revised. If implementation of any project element involves the removal of trees within Caltrans' jurisdiction, such as the removal of trees along Hawthorne Boulevard under the Hawthorne Option, Metro would coordinate with Caltrans' Office of Stormwater and Landscape Architecture, as appropriate, to ensure compliance with applicable requirements.
- 82-23 Metro acknowledges that the median within Hawthorne Option also serves as a pedestrian refuge. No revisions were made in the Final EIR in response to this comment.
- 82-24 The exact time frames for the types of construction that have the potential to affect visual character are not precise enough to compare. However, the Draft EIR does acknowledge the differences in impact as it relates to construction duration and phase where measurable.
- 82-25 During construction, all alignment options would involve similar types of construction equipment, vehicles, signs, staging, and personnel presence. However, as noted in the Draft EIR (e.g., page 3.3-90), the Hawthorne Option would introduce a larger permanent visual change due to the elevated guideway in a highly visible corridor, and would therefore result in a higher degree of visual change.
- 82-26 As discussed in Section 3.3-4.3 of the Draft EIR, because the project is in an urbanized area, the visual impact analysis considers whether the project would conflict with applicable zoning and other regulations governing scenic quality. To ensure a full assessment of this threshold, the Draft EIR follows the Federal Highway Administration (FHWA) methodology for visual impacts assessments, which evaluates changes in visual character and quality, including effects on viewers such as motorists. As part of this analysis, the Draft EIR considers changes associated with the elevated structure, including its scale, form, and relationship to adjacent land uses. The Hawthorne Option would not create a "tunnel-like" feeling for motorists, as the elevated structure would be located within the median, and motorists would primarily be driving parallel to the guideway, rather than underneath it, except when making a left turn or crossing through an intersection. The structure would span intersections and would not fully enclose the roadway. As a result, the Hawthorne Option would not create the physical characteristics of a tunnel, or result in a substantial depredation of existing visual quality.
- 82-27 As requested, text referencing Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR where the plans, profiles, and cross-sections for the alignments are included, has been added to Section 3.3-4.3.2 in Section 4.7, Corrections and Additions, of the Final EIR. The height and width of the elevated structure would vary along the alignment, but the elevated guideway would generally be about 30 feet high, and the OCS on top would be about 15 feet tall.
- Metro would follow all applicable safety laws, and structures would not block roadway signage or safety-related signage. The KOP simulations illustrate the general visual changes that would be expected to occur, and the exact location of columns and any required relocated signage would be refined during final design, with coordination with all applicable jurisdictional agencies to ensure that street signs, safety signage, and plaza signage remain visible and compliant with applicable standards.
- Metro would coordinate with Caltrans as needed for the removal and replacement of any trees on Caltrans facilities required by the project in accordance with applicable requirements from the Office of Stormwater and Landscape Architecture.

Section 3.3-4.4 of the Draft EIR addresses the potential for the project to create new shade or shadows that would substantially affect outdoor recreation facilities or other public areas. Although the CEQA Guidelines do not establish criteria for evaluating shade and shadow impacts, the Draft EIR assesses shadow impacts on shadow-sensitive uses, such as outdoor recreational areas and public spaces where prolonged outdoor activities occur. These are areas where shade could diminish the usability or function of the public space in a way that rises to the level of a physical environmental effect under CEQA. In contrast, sidewalks, streets, and building facades, including those on commercial corridors such as Hawthorne Boulevard, are not considered shadow-sensitive uses. This approach reflects the reality that such areas are already subject to intermittent shading from trees, awnings, buildings, and other urban structures, and their basic public purposes (circulation, access, commercial activity) are not meaningfully altered by transient or partial shading. Indeed, in many instances, temporary shade and shadowing in these areas is a welcome temporary reprieve. Additionally, the shade and shadow pattern created by the elevated structures would be intermittent, diffuse, and would shift throughout the day, and not likely interfere with the intended use of the space in a manner that would constitute a significant environmental impact. Accordingly, the Draft EIR did not identify shadow impacts along Hawthorne Boulevard as significant under CEQA, and no additional mitigation or detailed shadow modeling is warranted.

- 82-28 The Los Angeles County portion of the South Coast Air Basin has been designated as attainment/maintenance for the National Ambient Air Quality Standards (NAAQS) for carbon monoxide (CO) since 2007. No CO air quality violations have been recorded in this area for over 15 years. Furthermore, Metro acknowledges that the California Department of Transportation often requires CO hot-spot intersection or parking lot analyses for projects seeking funding from the Federal Highway Administration. These analyses are prepared following the Transportation Project-Level Carbon Monoxide Protocol (CO Protocol) (Caltrans, 2010). Sections 3 and 4 of the CO Protocol describe the methodology for determining whether a detailed CO hot-spot analysis is needed for a project if the project is suspected of resulting in higher CO concentrations than those existing within the region at the time of attainment demonstration. Using this methodology, a detailed CO hot-spot analysis is not needed for the project's Torrance TC because:
- > The background concentrations of CO in the project area are considerably lower than the CO concentrations used in the attainment demonstration for the intersection of Wilshire Boulevard and Veteran Avenue. As shown in Table 3.4-13 on Page 3.4-27 of the Draft EIR, the maximum background 1- and 8-hour CO concentrations in the project area were 1.8 and 1.5 ppm between 2018 and 2020. These concentrations are lower than the background concentrations used for the attainment demonstration which were predicted to be 10.8 ppm for the 1-hour measurements and 9.9 ppm for the 8-hour measurements for the year 2002, as shown in Table 4-4 from the 2003 Air Quality Management Plan (AQMP) Attainment Demonstration.
  - > The Torrance Transit Center parking lot would have much lower traffic volumes when compared to the intersection of Wilshire Boulevard and Veteran Avenue. In the modeling and attainment demonstration, the peak hour traffic volume at Wilshire Boulevard and Veteran Avenue was 10,601 vehicles. The Torrance TC parking lot volumes would not exceed 10,000 vehicles per hour.

- > The attainment demonstration evaluated the CO concentrations at a distance of 3 meters (10 feet) from the edge of the roadways. Since the CO Protocol does not permit the modeling of receptor locations closer than 3 meters (10 feet), receptor locations modeled for the project would be the same or farther than the receptors evaluated for the attainment demonstration.
- > The worst-case meteorology used to assess the project would be identical to the meteorology used for the Wilshire Boulevard and Veteran Avenue intersection in the attainment demonstration. The CAL3QHC model was used for the attainment demonstration. If the project were modeled, both intersections would be evaluated using the same meteorology settings in CAL3QHC, as the model only has one meteorological data set.
- > The number of vehicles operating in cold start mode was not available in the attainment demonstration. However, the percentage of vehicles operating during the peak hour in cold start mode for the project would be expected to be the same or lower than the Wilshire Boulevard and Veteran Avenue intersection.

Localized operational air quality impacts at parking lots are not typically evaluated in contemporary CEQA analyses because the aggregate average CO and PM mobile source emission rates have decreased so substantially since the original guidance was published that there is essentially no possibility of significant adverse concentrations resulting from a single project's effects on vehicle queuing. As described above, there is no potential for the project to result in a mobile source hot-spot at the Torrance Transit Center parking lot. Therefore, no further analysis is required.

- 82-29 See response to 82-28.
- 82-30 As requested, Section 2.5, Project Description, Appendix 2-C, Project Features, and Section 3.7-2.3 of the Draft EIR have been revised in Section 4.11 and Section 4.24, Corrections and Additions, of the Final EIR to include the Metro Tree Policy as a project feature for the protection of biological resources.
- 82-31 Metro would coordinate with Caltrans as needed on the removal and replacement of any trees on Caltrans facilities required by the project.
- 82-32 In response to this comment, Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys has been revised as requested in Chapter 4, Corrections and Additions, of the Final EIR, from 95 hours (4 days) to 72 hours (3 days).
- 82-33 The term "utilize" in Project Feature PF-HMM-3: Property Acquisition Phase II Site Investigation in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR encompasses areas where the project would disturb soil. Phase II Site Investigations would not be required in the resource study area (RSA) if the site would not be disturbed by the project. No revision is required. Metro would complete the required Phase II site investigations as part of the next phase of design.
- 82-34 As requested, in Chapter 4, Corrections and Additions, of the Final EIR, Project Feature PF-HMM-2 has been revised to include demolition of roadways. In addition, Section 3.9-4.1.1 of the Draft EIR has been revised to include an analysis of construction impacts related to hazardous wastes that may be encountered during roadway demolition, including lead based paint (LBP) and other heavy metals. These revisions do not change the conclusions of the Draft EIR, as hazardous wastes encountered during roadway demolition would be

handled in the same manner as for the rest of the project. Project Feature PF-HHM-2 would be part of the project, which requires demolition plans that detail the procedures for the handling and disposal of hazardous wastes in accordance with federal and state regulations. Therefore, the impact would remain less than significant.

- 82-35 The depth of elevated structure piles could range between 90 to 150 feet, depending on existing geotechnical and groundwater conditions. The exact depths of any structural piles required for the project would be determined during preliminary design, when geotechnical investigations would be completed.
- 82-36 See response to comment 82-13.
- 82-37 The I-405 ramp interchanges at Inglewood Boulevard and Hawthorne Boulevard are beyond the footprint of the Hawthorne Option. However, Metro notes this comment as an opportunity to coordinate future first/last mile planning with Caltrans priorities for active transportation.

#### **Submissions 84 Sean Moore, City of Lawndale**

- 84-1 Submission 84 includes the same comments from the City of Lawndale as Submission 22. See the responses to comments to Submission 22.

#### **Submission 94 Rochelle Campomanes, Los Angeles County Sheriff's Department**

- 94-1 Section 4.19, Corrections and Additions, of the Final EIR, includes corrections to state that the Redondo Beach Transit Center was completed without a dedicated police substation but rather an office space to be used by the Redondo Beach Police Department on an as-needed basis. Metro is aware that, since the Draft EIR's publication, the City of Torrance has proposed plans to construct a new parking structure adjacent to the Torrance TC with dedicated space for a Torrance Police Department substation. This project has been added to the cumulative projects list in Section 3.0, Introduction, included within Section 4.4, Corrections and Additions, of the Final EIR. These changes do not result in changes in the cumulative analysis presented in the Draft EIR, as construction of the Torrance project is anticipated to be completed prior to this project.
- 94-2 As described in Section 3.15, Public Services, and Section 3.16, Other CEQA Considerations, of the Draft EIR, the project would not result in unplanned population growth beyond any regional growth projections. Because the project would not introduce new residential development or significant unplanned growth, it is not anticipated to generate a substantial increase in demand for permanent public services, such as law enforcement, that would necessitate construction of new or expanded governmental facilities.
- Metro works closely with local law enforcement, including the Los Angeles County Sheriff's Department (LASD), to ensure that safety and security resources are appropriately allocated.
- See MR-9: Light Rail Security and MR-15: Metro Ridership Forecasting Methodology.
- 94-3 The analysis in Section 3.15, Public Services, of the Draft EIR has been revised within Section 4.19, Corrections and Additions, of the Final EIR, to state that LASD does not provide public safety services to the City of Inglewood.

- 94-4 The analysis in Section 3.15, Public Services, of the Draft EIR has been revised within Section 4.19, Corrections and Additions, of the Final EIR, to include the LASD response times provided in the comment. This information does not change the conclusion provided on pages 3.15-31 of Chapter 3.15, Public Services, of the Draft EIR, of less than significant for police services.
- 94-5 As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan (CTMP) requires contractors to develop a CTMP with Metro, which would be submitted to all jurisdictions for review, including LASD.

**Submission 121 Mandy Huffman, Los Angeles County Sanitation Districts**

- 121-1 The Los Angeles County Sanitation Districts' (Districts) statement regarding the Districts' policy on groundwater discharges into its sewerage system is noted. The statement on page 3.9-12 of the Draft EIR that "The County of Los Angeles Department of Public Works would be contacted prior to discharging groundwater into their sewer or stormwater systems" reflects a general description of one procedural element in Project Feature PF-HHM-5: Disposal of Groundwater regarding discharge activities. Metro recognizes that stormwater is generally directed to storm drains, not the sewerage system. As set forth by Project Feature PF-HHM-5, Metro would consult with applicable agencies, including the Districts, regarding groundwater discharge and disposal, as requirements for such activities vary by agency, location, concentration, and contaminants.
- 121-2 The Districts' statement regarding its policy restricting stormwater discharge into the sewerage system is acknowledged. The statement on page 3.11-13 of the Draft EIR that "both stormwater runoff and sewage are collected and transported through underground municipal sewage systems" reflects a general description of wastewater and stormwater systems. However, Metro recognizes that stormwater is generally directed to storm drains, not the sewerage system. Clarifying language has been added to Section 4.11-3.2 of the Final EIR, stating that stormwater discharge is not typically received in the Districts' sewage system. As discussed on page 3.11-21 of the Draft EIR, the project may require the relocation of existing stormwater drainage infrastructure. As described in Section 3.10, Hydrology and Water Quality, of the Draft EIR, the project includes several project features to ensure effects on the stormwater system remain insignificant. These include Project Feature PF-HWQ-1: SWPPP Implementation per Construction General Permit and MS4 Permit, which would help reduce stormwater runoff velocity, and Project Feature PF-HWQ-4: Trench Construction Runoff Collection and Treatment, and Project Feature PF-HWQ-5: Temporary Storm Drain Inflow Rerouting, which would prevent exceedances of existing storm drain capacity in connection with trench construction. Further, Metro would comply with all permit requirements, including obtaining an Industrial Wastewater Discharge Permit. For more information regarding project features and stormwater management, see Section 3.10, Hydrology and Water Quality, and Section 3.11, Utilities and Service Systems, of the Draft EIR.
- 121-3 Metro has coordinated with the Districts' during the environmental review process and would continue to do so throughout future phases of design and prior to construction. As project plans advance and incorporate more detailed information regarding the Districts' facilities, Metro would submit plans and specifications to the Districts for review and comment. See MR-7: Utility Relocation and Hazardous Materials Safety.

- 121-4 The sewer line and other utilities that are longitudinally along the alignments are shown in the cross-sections in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, along with the dimensions of the utilities and owner. The 8-inch sewer line under the Districts' jurisdiction that is identified for relocation as part of the Hawthorne Option is located near the intersection of 160th Street and Grevillea Avenue. Metro has coordinated with all utility owners in preparation of the EIR, and would continue to do so throughout future phases of design and prior to construction.
- 121-5 The Draft EIR correctly states that the RSA, which encompasses the cities of Lawndale, Redondo Beach, and Torrance, is serviced in some capacity by the Joint Water Pollution Control Plant (JWPCP). The Draft EIR uses the same provided link as the source for the JWPCP service area, which is listed in Chapter 5, References, on page 5-21 of the Draft EIR. However, the reference title is incorrect and listed as "Los Angeles County Sewer Districts (LACSD)", which has been corrected in Section 4.15, Corrections and Additions, of the Final EIR. This correction does not change the meaning or conclusions of the Draft EIR.
- 121-6 See response to Comment 121-5. The reference to "Los Angeles County Sewer Districts" has been corrected to "Los Angeles County Sanitation Districts" in Chapter 4, Corrections and Additions, of the Final EIR.
- 121-7 See response to Comment 121-3.

**Submission 123 Ruby Kwan-Davis, California Department of Fish and Wildlife**

- 123-1 Metro acknowledges the California Department of Fish and Wildlife's (CDFW) authority and jurisdiction over the items listed in this comment. As explained in Section 3.7, Biological Resources, of the Draft EIR, the project is not anticipated to impact CDFW jurisdictional areas related to rivers, streams, or lakes because the project footprint does not cross or otherwise encroach on any sensitive habitat types. Moreover, there are no state or federally endangered or threatened species identified with potential to occur that could be impacted by construction or operation activities.
- 123-2 The agency accurately summarizes the project described in the Draft EIR.
- 123-3 Coordination between CDFW and the City of Torrance is noted. In August 2025, Metro staff and consultants met with CDFW and City of Torrance staff to discuss the project's proposed mitigation for southern tarplant (*Centromadia parryi ssp. australis*) set forth in Section 4.11, Corrections and Additions, of this Final EIR, and discussed in response to Comment 123-4 below.
- 123-4 Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR correctly depicts the project's footprint extending into the City of Torrance's approximately two-acre Southern Tarplant Open Space Preserve adjacent to the Torrance Transit Center. However, the Draft EIR inadvertently omitted this encroachment, which is approximately 7,471 square feet, from the impact discussion in Section 3.7-4 of the Draft EIR. Since the publication of the Draft EIR, Metro has confirmed that maintenance and emergency access would require both temporary and permanent disturbance within the Preserve. During project design development, Metro evaluated options to avoid the Preserve entirely, including whether maintenance could be done from on top of the tracks, but full avoidance was determined to be infeasible because the Preserve occupies the only practicable location for the required maintenance and emergency access path serving the Torrance Transit Center Station.

Section 3.7-4 of the Draft EIR has been revised in Section 4.11, Corrections and Additions, of this Final EIR to address potential impacts related to this encroachment during both construction and operation. The revised analysis concludes that the project would directly and indirectly affect southern tarplant within the Preserve by potentially reducing the number of individual plants and decreasing contributions to the seed bank, thereby weakening the long-term resilience of the on-site population. Although the regional viability of southern tarplant is not expected to be affected—because the Preserve’s population is ecologically and geographically isolated from other known occurrences—the analysis acknowledges that the project would diminish the on-site viability of the species and affect an area originally established as mitigation for the 2014 Torrance Transit Center Project.

To avoid and minimize effects during construction and operation, the project would implement Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources and MM-BIO-4: Pre-Construction Rare Plant Survey. These measures require delineation of work limits and buffers, preconstruction rare plant surveys to document then-existing conditions, and on-site monitoring by a qualified biologist. Mitigation Measure MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources would also apply to ongoing operational maintenance.

In addition, new Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat, has been added in Section 4.11, Corrections and Additions, of this Final EIR, to address the project’s direct and permanent loss of habitat within the Preserve. MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to offset impacts at a 3:1 ratio through establishment, preservation, and perpetual management of suitable habitat. The measure establishes a mitigation hierarchy. Metro understands that the City of Torrance is currently evaluating relocation and re-establishment of the entire Southern Tarplant Open Space Preserve at the Elm Water Yard within the City. If the City elects to proceed with that relocation, Metro may satisfy its mitigation obligation by entering into an agreement with the City to fund and implement a proportional share of the new preserve. Such an agreement must include provisions for long-term management funding and performance standards at least equivalent to those described in MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat. If the City does not proceed with relocation, Metro would be required to implement a stand-alone off-site mitigation project that secures appropriate land rights, provides habitat enhancement, establishes monitoring, and funds perpetual management.

If no suitable site can be identified within the City of Torrance, Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to evaluate off-site locations outside the City where southern tarplant is known to occur or where appropriate habitat exists. For example, southern tarplant has been documented within the Ramona Grasslands Open Space Preserve in San Deigo County (CBI, 2004) and on nearby privately held parcels, and the species is also present in other coastal counties from Santa Barbara to San Diego that provide similar soils and hydrological conditions. These examples demonstrate that feasible off-site mitigation opportunities exist should relocation within Torrance prove infeasible. Finally, if no appropriate site can be identified after a reasonable and documented effort, Metro must consult with CDFW to identify an alternative mitigation strategy that achieves equivalent biological value and long-term viability, which may include payment of an in-lieu fee to a CDFW-approved land management entity.

Pursuant to Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat, Metro would also prepare a Southern Tarplant Translocation/Enhancement Plan in consultation with CDFW. The plan would include methods for seed collection over a minimum of two years, best management practices for planting and invasive species control, monitoring protocols, and an implementation schedule.

As described in Section 4.11, Corrections and Additions, of this Final EIR, with implementation of these mitigation measures, construction and operational impacts to southern tarplant and the Southern Tarplant Open Space Preserve would be less than significant.

123-5 See response to Comment 123-4

123-6 See response to Comment 123-4.

123-7 See response to Comment 123-4.

123-8 See response to Comments 123-4.

123-9 See response to Comments 123-4. As noted in the comment, southern tarplant is a CRPR 1B.1 species. It therefore qualifies as a rare plant under CEQA Guidelines Section 15380. Metro recognizes this status and has applied the appropriate CEQA standard in identifying and mitigating impacts.

123-10 See response to Comment 123-4.

123-11 See response to Comment 123-4. CDFW recommends a series of mitigation measures to address the Project's impacts on southern tarplant within the Southern Tarplant Open Space Preserve. Metro agrees with the intent of these recommendations, and the Final EIR includes mitigation measures that collectively meet or exceed them. As discussed in Response to Comment 123-4, Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, MM-BIO-4: Pre-construction Rare Plant Survey, and MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat require delineation of work areas, pre-construction surveys, on-site monitoring, compensatory mitigation at a minimum 3:1 ratio, preservation and management of habitat in perpetuity, preparation of a Southern Tarplant Translocation/Enhancement Plan in consultation with CDFW, and establishment of an endowment or equivalent funding mechanism for long-term management. These requirements are consistent with CDFW's recommendations for compensatory mitigation, CDFW review of mitigation sites, perpetual habitat protection, long-term management funding, and detailed protocols for seed collection, translocation, and monitoring. The individual responses below explain more specifically how CDFW's recommendations have been addressed.

123-12 See response to Comment 123-4.

New Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to offset permanent impacts to southern tarplant at a minimum ratio of 3:1, or a higher ratio if required by CDFW. Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat specifies that mitigation must be achieved through establishment, preservation, and perpetual management of suitable habitat, supported by a site-specific biological assessment to confirm that soil, hydrology, and ecological conditions are capable of supporting a self-sustaining population. Consistent with CDFW's recommendation, MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat also requires

Metro to identify and evaluate potential mitigation sites within the City of Torrance and recognizes that the City is evaluating relocation of the Preserve to the Elm Water Yard as a primary mitigation option. If relocation within Torrance is not feasible, Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to identify other suitable sites, including existing preserves known to support southern tarplant populations, or to consult with CDFW to establish an alternative strategy that achieves equivalent biological value and long-term viability.

Accordingly, Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires compensatory mitigation in perpetuity at or above the level CDFW recommends and provides for preservation or establishment of suitable habitat in Torrance where feasible, or at another location capable of supporting a viable population.

- 123-13 See response to Comment 123-4. New Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to coordinate with CDFW in identifying and evaluating potential mitigation sites. Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat further requires that a site-specific biological assessment confirm the suitability of any proposed mitigation land for long-term southern tarplant populations before acquisition.
- 123-14 See response to Comment 123-4. New Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires that off-site mitigation lands be permanently protected and managed in perpetuity through mechanisms such as conservation easements or other legally enforceable land protection instruments, together with an endowment or equivalent funding for long-term management. Consistent with CDFW's recommendation, these protections must be secured prior to any ground-disturbing activities that would affect the Southern Tarplant Open Space Preserve.
- 123-15 See response to Comment 123-4. New Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to provide an endowment or other long-term funding mechanism to ensure perpetual management of replacement habitat. The measure also requires preparation of a Southern Tarplant Translocation/Enhancement Plan in consultation with CDFW that will include monitoring and management protocols. Together, these provisions address CDFW's recommendations for ongoing botanical surveys, non-native species control, reporting, and protections against future land use changes and other indirect impacts.
- 123-16 See response to Comment 123-4. New Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to retain a qualified biologist to prepare a Southern Tarplant Translocation/Enhancement Plan in consultation with CDFW. MM-BIO-5 specifies that the plan must include seed collection for a minimum of two years, planting and invasive species control methods, monitoring protocols, and an implementation schedule. The measure must be complied with prior to ground-disturbance activities that could affect the Preserve.
- 123-17 On a yearly basis (once a year) during project construction, Metro would submit to the California Natural Diversity Database (CNDDDB) information on special status species from its surveys for the project and submit information on special status native plant populations and sensitive natural communities to CDFW's Vegetation Classification and Mapping Program as required by the California Public Resources Code.

- 123-18 See responses to Comments 123-4 and 123-12 through 123-16. Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources through MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat are specific, detailed, and enforceable, consistent with CEQA Guidelines sections 15126.4(a)(2) and 15097 and Public Resources Code section 21081.6. As explained in responses to Comments 123-4 and 123-12 through 123-16, the Final EIR includes Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, MM-BIO-4: Pre-construction Rare Plant Survey, and MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat, which collectively meet or exceed the recommendations set forth in CDFW’s letter, including Exhibit A of the letter. These measures identify responsible parties, timing, performance standards, and, where appropriate, long-term funding mechanisms, and they will be incorporated into the Mitigation Monitoring and Reporting Program prepared for the Project pursuant to Public Resources Code section 21081.6.
- 123-19 As required by Public Resources Code section 21089, Fish and Game Code section 711.4, and California Code of Regulations, title 14, section 753.5, payment of the applicable CDFW filing fee would be made upon filing of the Notice of Determination.
- 123-20 See responses to Comments 123-4 and 123-11 through 123-16.

**Submission 126 David Leger, South Bay Cities Council of Governments**

- 126-1 In January 2023, Metro published several reports alongside the Draft EIR, which provided information on ridership, cost, real estate, urban design, transportation, and alternatives considered and eliminated. These reports were made available on the project’s website via the link to “Project Filing Cabinet.” These were all considered alongside the Draft EIR when the Metro Board made an LPA selection and, along with the Final EIR and all public comments, will inform the Metro Board’s final decision-making process for the project. See MR-1: Selection of Alternatives.
- 126-2 Section ES-3, Executive Summary, of the Draft EIR summarizes the environmental topics that were determined to have no impact, a less-than-significant impact, or a less-than-significant impact with mitigation.
- 126-3 Project objectives can be found in Chapter 2, Project Description, of the Draft EIR. Metro published several non-CEQA reports alongside the Draft EIR in January 2023, including information on cost and ridership. Additional information can be found on the project website at metro.net/clineext. The Metro Board selected the LPA in May 2024. The Metro Board is expected to consider certification of the Final EIR and potential project approval in 2025, taking into consideration all public comments and feedback received throughout the environmental review process.
- 126-4 The Redondo Beach and Torrance TCs both provide existing parking spaces that could be used for transit customers. Page 2-20 of Chapter 2, Project Description, of the Draft EIR, states that the project includes a parking lot with an additional 180 spaces at the Torrance Transit Center, which would serve as the terminus station for the light rail line. However, Metro is not proposing to construct or own this parking directly. Instead, parking would likely be provided through a lease agreement with the City of Torrance, which plans to build

a parking structure at this site. This has been updated in Chapter 4, Corrections and Additions, of the Final EIR.

The project alignments along the Metro ROW would not eliminate any on-street parking. Based on conceptual designs, the Hawthorne Option would eliminate approximately 20 on-street parking spaces in the median of the street to allow for columns to support the elevated light rail guideway; these spaces would not be replaced.

- 126-5 Under CEQA, the reduction or elimination of parking in an urban setting is generally not considered a significant environmental impact in and of itself, particularly for a project designed to reduce vehicle miles traveled. Although secondary environmental effects associated with loss of parking could be considered environmental effects, no such impacts are anticipated here. However, to provide information to the public, Metro shared potential loss of parking as part of the 2023 Transportation Detail Report, published concurrently with the Draft EIR.
- 126-6 The High-Frequency Bus Alternative is considered an express service because it would feature some BRT characteristics, such as transit signal priority systems. As stated in Chapter 4, Evaluation of Alternatives, of the Draft EIR, the High-Frequency Bus Alternative could eliminate some on-street parking. As described in response to Comment 126-5, the Draft EIR appropriately does not consider a loss of parking, standing alone, to constitute a significant environmental impact. Furthermore, the removal of parking is not anticipated to result in secondary impacts, as it is unlikely to lead to a substantial increase in VMT, including idling cars, which could affect air quality. Additionally, sufficient street parking would remain available in the area, and since this is not a high-density corridor, overall parking demand is expected to be met without significant disruption.
- 126-7 The sentence cited the comment from Section ES.5-1 of the Draft EIR is not contradictory. The Draft EIR evaluates vibration impacts separately for potential damage and human annoyance. The 170th/182nd Grade-Separated Light Rail Transit Alternative (i.e., the LPA) would have a less than significant construction vibration impact with respect to *structural damage* after mitigation, but would still result in a significant and unavoidable impact related to *annoyance* during construction.
- 126-8 As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, while the High-Frequency Bus Alternative is the environmentally superior alternative, it would not achieve the same level of benefits with respect to VMT reduction, air quality improvements, GHG emission reduction, and energy savings compared to the Elevated/At-Grade Alignment and Options.
- See response to Comment 126-1. Note that although the LPA has been selected, the Metro Board has not yet made a final decision on the project. The Metro Board will review the Final EIR, as well as factors such as costs, ridership, implementation timeframes, funding sources, and ability to achieve the project objectives, before making its final determination on the project.
- 126-9 As described in Chapter 2, Project Description, of the Draft EIR, existing at-grade crossings for freight would be upgraded and designed to be “quiet zone ready.” Existing at-grade

freight crossings to be upgraded would include Inglewood Avenue, Manhattan Beach Boulevard, 159th Street, 160th Street, 161st Street, 162nd Street, 170th Street, and 182nd Street. The “quiet zone ready” design includes site-specific safety infrastructure such as vehicle gates, pedestrian gates, signals such as lights and bells, and sidewalks and ramps that are all Americans with Disabilities Act (ADA) compliant and meet Federal Railroad Administration (FRA) standards. These improvements would enable local jurisdictions to apply for quiet zone designations, which would eliminate the routine sounding of train horns at these crossings.

Quiet zones are specific to freight horn noise and would not be applicable to the light rail bells. However, the LPA fully grade separates the light rail from vehicular and pedestrian crossings. As such, there would be no light rail transit bell noise at street crossings for the LPA.

- 126-10 This has been noted in Section 4.2, Corrections and Additions, of the Final EIR, with the Executive Summary revised to state the multiple overhead high tension transmission lines would need to be raised or relocated for the Hawthorne Option to ensure a safe clearance between the elevated light rail structure and utility lines. This change would not result in new or more severe visual impacts than already evaluated in the Draft EIR. The analysis considered the visual impacts of elevated light rail structures within an urbanized commercial corridor that already contains large-scale infrastructure, including overhead utilities. The incremental increase in height required to maintain safe clearances between the elevated guideway and utility lines would not introduce a new visual element or substantially increase the visibility, contrast, or dominance of the project. Therefore, the Draft EIR’s conclusions regarding visual impacts of the Hawthorne Option remain valid.
- 126-11 The Executive Summary is intended to provide a high-level summary of the CEQA impact determinations and does not include detailed information about specific design elements. Noise and vibration impacts associated with the freight track relocation are evaluated in Section 3.6, Noise and Vibration, of the Draft EIR. See Chapter 2, Project Description, of the Draft EIR, Appendix 2-A Select Advanced Conceptual Engineering Drawings, of the Draft EIR, Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for detailed information on freight track relocation.
- 126-12 This comment duplicates Comment 126-11. See the response to that comment.
- 126-13 The Executive Summary is intended to provide a high-level summary of the CEQA impact determinations and does not include detailed construction scheduling information. See Chapter 2, Project Description, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, which include information on the total construction duration and key tasks for the alignments. The purpose of an EIR is to assess potential environmental impacts of a project, rather than to provide detailed project management or scheduling information. While construction timelines are summarized in the EIR to aid in the evaluation of potential environmental impacts, detailed project schedules, such as those presented in Gantt Charts, are more relevant to project management and implementation and are not necessary for CEQA’s environmental analysis requirements. Metro released a

summary of cost and schedule information in 2023, published concurrently with the Draft EIR, which was also included in the Board Report for the LPA selection in May 2024.

- 126-14 The cost estimates for the alignments include the cost of required property acquisitions, including south of 190th Street. Metro has been coordinating and would continue to coordinate closely with BNSF on the track design in this area to ensure that the designs meet their operational requirements and are feasible to construct. The project is designed as a 4.5-mile light rail extension between the Redondo Beach (Marine) Station and the Torrance TC. Sequencing future construction of the project to initially only extend to Redondo Beach would require direction from the Metro Board.
- 126-15 The proposed multi-use recreational path depicted in Figure 2.3-4 of the Draft EIR would be located between 159th and 170th Street within the City of Lawndale. As indicated in Section 2.3-1.1 of the Draft EIR, there is not sufficient room within the Metro ROW to extend the path south of 170th Street.
- An additional multi-use path is planned between Grant Avenue and 182nd Street to connect neighborhoods to the north and south to the station at the Redondo Beach TC. While these paths would not be continuous throughout the entire corridor, they would provide key recreational and access points. Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Appendix B, Select Advanced Conceptual Engineering Drawings – Locally Preferred Alternative, of the Final EIR include additional details on the paths.
- 126-16 Quad gates and/or median barriers would be designed and constructed as part of the project. Metro would install all necessary quiet zone equipment, including quad gates, pedestrian gates, and signals, to enable the at-grade crossings to qualify for an Automatic FRA Approval for a quiet zone. However, the designation of a quiet zone requires the cities to apply to the FRA, as Metro does not have authority to establish quiet zones. Mitigation Measure MM-NOI-4: Quiet Zone Establishment commits Metro to working with the cities on the FRA application process. The term “quiet zone ready” in the text reflects this process and the project’s compliance with FRA requirements. The figure accurately represents the quad gate configuration that would be installed. As a result, revisions to the drawings are not necessary.
- 126-17 The term “Metro Leased to 3rd Party” refers to an area within the Metro ROW, that Metro has leased to a private property owner or entity for use of Metro property. Metro retains ownership of the property, but under the lease agreement, a third party is permitted to use the space.
- 126-18 The project would not add new parking at the Redondo Beach TC. Existing parking at this facility would continue to be available for transit users. At the Torrance TC, the Draft EIR identifies approximately 180 spaces for transit use, but Metro is not proposing to construct or own this parking directly. Instead, parking would likely be provided through a lease agreement with the City of Torrance, which plans to build a parking structure at this site. These parking spaces would support ridership at the terminus station but are not intended to replace existing parking on a one-to-one basis.

All stations would include the necessary vertical circulation elements, such as elevators, ramps, and stairs, to ensure accessibility for all users. The South Bay Galleria Station (Hawthorne Option) is an elevated station and would include escalators. At the Redondo Beach TC Station, the vertical circulation design depends on the alignment. Under the Elevated/At-Grade Alignment, the station would be elevated and include escalators and elevators. Under the Trench Option and the LPA, the station would be approximately 10 feet below grade and accessed via ramps to the platform, consistent with ADA requirements. These features are shown in the design drawings and would be included in the final station design.

The apostrophe in the sentence in Section 2.3-1.4 of the Draft EIR has been corrected in Section 4.3, Corrections and Additions, of this Final EIR.

- 126-19 In Fall 2024, Metro implemented a new operating pattern for the C and K Lines, which both serve LAX. Based on this operational change, the project would operate as an extension of the Metro K Line traveling north/south between the Metro E Line and Torrance. Based on the preliminary operations plan for the project, five additional vehicles would be required to operate this light rail extension.
- 126-20 The Executive Summary is focused on summarizing the CEQA impact determinations, so this additional detail was not added. Property acquisitions are not considered a CEQA impact. See the 2023 Real Estate Acquisition Report, published concurrently with the Draft EIR, which summarizes properties affected. See also the 2025 Real Estate Acquisition Report, published concurrently with this Final EIR, which summarizes affected properties for the LPA.
- 126-21 The Executive Summary is intended to provide a high-level summary of the CEQA impact determinations and does not include detailed information, such as construction staging areas. See the 2025 Real Estate Acquisition Report, published concurrently with the Final EIR, for a summary of potential construction staging areas for the LPA. These staging areas have been revised following the publication of the Draft EIR, and would also apply to the other Metro ROW alignments.
- 126-22 The construction tables and associated text in Section 2.4-3 of the Draft EIR reflect the total duration of each major task—overlapping has been accounted for in the overall schedule. Therefore, the tables already present an accurate representation of the construction timeline for the project and options. Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes the construction duration for the LPA. Concurrent with the Draft EIR, Metro published the 2023 Cost Estimate Summary, which includes a graphic comparing the preliminary construction schedules for the alignments and options studied in the Draft EIR.
- 126-23 Consistent with FTA and Metro requirements, the use of a future “Horizon Year” is standard practice when assessing the long-term effects of a proposed project. The Horizon Year (2042) allows for consideration of the project’s impacts in concert with other regional transportation projects and anticipated growth in population, employment, and land use over time.

The year 2021 represents the baseline for evaluating the project's potential effects on the existing environment, as it corresponds to the issuance of the Notice of Preparation and reflects conditions at the time the environmental review commenced. Using this year ensures an accurate environmental baseline for assessing impacts and is consistent with Section 15125(a) of the CEQA Guidelines. Additionally, the Metro Transportation Analysis Model is a tool that is updated periodically to assess future ridership of potential projects. The base year for ridership forecasts, 2017, is used to calibrate the model to existing (pre-pandemic) conditions.

- 126-24 Metro's BRT Vision and Principles Study identifies Hawthorne Boulevard between the cities of Inglewood and Torrance as one of the 30 corridors in the Strategic BRT Network, though it is not one of the top five priority BRT corridors. However, the C Line Extension to Torrance Project is a separate project, as it is specifically a study to extend the light rail line from the existing terminus in Redondo Beach to Torrance. A potential Hawthorne Boulevard BRT corridor is not analyzed in this study as it would be a separate project with a distinct scope and objectives.
- 126-25 No revisions are made in the Final EIR in response to this comment. The Executive Summary is focused on summarizing the CEQA impact determinations, so this additional detail was not added.
- 126-26 See Section 4.6, Corrections and Additions, of the Final EIR, for the requested revision. The revision addresses a minor style inconsistency present on page 3.2-31 of the Draft EIR and does not change the analyses or conclusions of the Draft EIR.
- 126-27 The first instance of KOP is spelled out in Section 3.2, Land Use and Planning, of the Draft EIR prior to Section 3-4.3.2 of the Draft EIR.
- 126-28 The requested revision is not necessary, as the SBCCOG's recommendation is indicated in Table ES-2 and Table ES-3 of the Draft EIR. No revisions are made in the Final EIR in response to this comment.
- 126-29 The requested revision is not necessary, as the SBCCOG's recommendation is indicated in Table ES-2 and Table ES-3 of the Draft EIR. No revisions are made in the Final EIR in response to this comment.
- 126-30 The requested revision is not necessary, as the SBCCOG's recommendation is generally summarized in Table ES-2 of the Draft EIR. Furthermore, as stated on page ES-17 of the Draft EIR, Table ES-2 shows a summary of the identified environmental impacts, mitigation measures, and level of significance after mitigation is applied, but detailed analyses of the topics in the table are provided in Chapter 3 of the Draft EIR. No revisions are made in the Final EIR in response to this comment.
- 126-31 See response to Comment 126-30. This same reasoning applies with respect to construction vibration impacts.
- 126-32 The Metro Board has considered and would continue to consider issues such as cost, ridership, implementation timeframes, and funding sources and availability, as part of their decision-making on the project.

- 126-33 In Section 4.21, Corrections and Additions, of the Final EIR, Table 4.5-1: Comparison of Alternatives' Environmental Impacts to the Proposed Project has been updated in the Final EIR to include a note defining the acronyms used in the table. The revision does not change the analyses or conclusions of the Draft EIR.
- 126-34 The SBCCOG's recommended text is already indicated on page ES-43 of the Draft EIR, which includes that the "No Project Alternative is evaluated in the context of the existing transportation facilities in the Project Area and other capital transportation improvements and/or transit and highway operational enhancements that are reasonably foreseeable." No revisions are made in the Final EIR in response to this comment.
- 126-35 The requested revision does not change the meaning or conclusions of the Draft EIR. No revisions were made in the Final EIR in response to this comment.

**Submission 127 Anthony Higgins, California Department of Transportation – District 7**

- 127-1 In addition to the three options listed here, the Draft EIR also evaluates a No Build, High-Frequency Bus Alternative, and the 170th/182nd Grade-Separated Light Rail Transit Alternative (now the LPA) in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives.
- 127-2 Metro recognizes Interstate 405 (I-405), the San Diego Freeway, and State Route 107 (SR 107), a segment of Hawthorne Boulevard as Caltrans' facilities. In 2003, the segment of SR 107 within the City of Lawndale was relinquished to the city.
- 127-3 Caltrans's support for the project is acknowledged. The project's consistency with Caltrans's plans, statewide legislation, regional transportation planning efforts, and role in supporting policy goals to reduce VMT, improve air quality and promote alternative modes of transportation is also noted.
- 127-4 Metro would continue to coordinate with Caltrans for all necessary permits for design and construction of facilities that directly affect Caltrans facilities. The Hybrid Alternative selected as the LPA by the Metro Board would cross SR 107, and not affect I-405.
- 126-5 The SBCCOG's statement that no transportation safety impacts to state facilities are anticipated from the Elevated/At-Grade Alignment, provided all necessary permits and approvals are obtained through the Office of Permits, is noted. The LPA follows the Metro ROW and therefore remains consistent with the commentor's statement regarding transportation safety. The LPA meets the project's objectives and avoids transportation safety impacts, while avoiding or minimizing noise, vibration, and construction impacts compared to the project and Trench Option analyzed in the Draft EIR.

**Submission 130 Brandy Forbes, City of Redondo Beach**

- 130-1 The City's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.
- 130-2 The comment is noted. All comments have been shared with the Metro Board for their consideration. Both Redondo Beach station locations studied in the Draft EIR would serve the South Bay Galleria and planned redevelopment area, which extends from Hawthorne Boulevard to Kingsdale Avenue and includes the existing Redondo Transit Center. The

proposed Hawthorne Station would be located closer to the northeastern corner of the redevelopment site, while the southwestern corner is closer to the Redondo Beach TC. The LPA would have a station along the Metro ROW, immediately adjacent to the Redondo Beach TC and within walking distance of the South Bay Galleria redevelopment area.

- 130-3 The City's interest in maximizing connectivity between the C Line extension and the Crenshaw/LAX Transit Corridor Project is noted. All comments have been shared with the Metro Board for their consideration. In Fall 2024, Metro implemented a new operating pattern for the Metro C and K Lines. Under this revised service plan, the project would operate as part of the K Line. All alignments studied in the Draft EIR would connect to LAX via the K Line. Metro modeled the estimated travel times between the Torrance TC and the LAX/Metro Transit Center Station for both the Metro ROW alignments and Hawthorne Option. The analysis found that both routes would have the same travel times, with an estimated 19-minute trip from Torrance to LAX/Metro Transit Center.

The 2023 Ridership Report, published concurrently with the Draft EIR, found that the Hawthorne Option would generate higher project trips and new riders than the alignments along the Metro ROW, but lower VMT reduction and travel time savings. Metro analyzed travel benefits in relation to construction cost estimates (see May 2024 Metro Board Report)<sup>2</sup> and found that the Hawthorne Option was less cost effective than the LPA. See MR-15: Metro Ridership Forecasting Methodology.

Additionally, the LPA would include a station along the Metro ROW, immediately adjacent to the Redondo Beach TC. Although the South Bay Galleria would be within walking distance of both the Redondo Beach TC (along the Metro ROW) and South Bay Galleria Station (included only as part of the Hawthorne Option), the LPA station would be better suited to directly serve rail to bus transfers at the Redondo Beach TC, as well as provide a more convenient drop-off and pickup location than the South Bay Galleria Station. Thus, the regional connectivity benefits that would be provided as part of the Hawthorne Option are similarly anticipated to be realized as part of the LPA, if not exceeded.

- 130-4 See MR-13: Soil Stability and Sinkholes. As set forth in Section 3.8-4.6 of the Draft EIR, existing geotechnical data indicates that the project would be feasible within the Metro ROW and would not result in significant impacts during construction or operation related to subsidence, collapse, or similar conditions. The Metro ROW is an established transportation corridor with existing infrastructure, and the area has not exhibited systemic geological instability in the form of recurrent sinkholes or similar concerns. The successful use of the Metro ROW over decades suggests it is geotechnically suitable for expanded transit use. The Metro ROW soil types are generally well-documented and do not present unusual risk factors for sinkhole formation under typical construction conditions. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical explorations would be conducted in the next design phase to guide engineering and construction practices. Metro has extensive experience conducting similar transit projects with comparable soil conditions, and proven techniques, such as controlled grading, compaction, and soil

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<sup>2</sup> See the May 2024 Metro Board Report at <https://boardagendas.metro.net/board-report/2024-0272/>.

stabilization, would be employed based on the site-specific geotechnical analyses. Also see MR-13: Soil Stability and Sinkholes for additional information.

As described in MR-13: Soil Stability and Sinkholes, the sinkhole mentioned in the comment was reportedly caused by a broken irrigation line in the homeowner's yard. It is unclear whether the line break was the result of Shell's drilling activities, which differ significantly from the construction methods planned for the project, or due to unrelated factors. Drilling operations, especially those involving extraction, could alter subsurface pressure and create voids, increasing the risk of subsidence and sinkholes. In contrast, Metro's construction, including the planned trenching, would involve controlled excavation with no substantial extraction of subsurface materials that could destabilize soil layers. Additionally, as required by Project Feature PF-GEO-1: Metro Geotechnical Design Standards, the project would incorporate site-specific geotechnical evaluations and stabilization techniques, such as soil grouting and reinforced shoring, to ensure stability. These measures and best construction practices are designed to prevent soil disturbance that might otherwise lead to subsidence or sinkholes.

Section 3.8, Geology and Soils, of the Draft EIR has been revised in Section 4.12, Corrections and Additions, of the Final EIR, to include additional information on collapsible soils within the project area. The addition provides further clarity that there is a low risk related to subsidence and collapsible soils, and it does not change the conclusions of the Draft EIR.

130-5 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

The City expresses concern about potential construction and operational noise and vibration impacts with the Metro ROW alignments. While Metro acknowledges these concerns, the comment does not fully reflect the Draft EIR. As described in Section 3.6, Noise and Vibration, of the Draft EIR, the Elevated/At-Grade Alignment would result in a significant and unavoidable operational impact at two sensitive receptor clusters located near the at-grade crossing at 170th Street. In contrast, the Trench Option and LPA, which would place the light rail in a trench below 170th and 182nd Streets, would eliminate the need for audible crossing signals. With implementation of Mitigation Measures MM-NOI-2: Soundwalls, MM-NOI-3: Low Impact Frogs, and MM-NOI-4: Quiet Zone Establishment, operational noise impacts for the Trench Option and LPA would be less than significant with mitigation. See Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR for additional information regarding the LPA. Also see MR-3: Operational Noise Project Features and Mitigation Measures.

Regarding construction impacts, the Draft EIR concludes that all of the light rail alignment options and alternatives – the Elevated/At-Grade Alignment, Trench Option, Hawthorne Option, and 170th/182nd Grade-Separated Light Rail Transit Alternative (the LPA) – would result in significant and unavoidable construction-related noise and vibration impacts due to the intensity and proximity to work activities. To address the significant construction noise impact, the Draft EIR sets forth Mitigation Measure MM-NOI-1: Noise Control Plan, which requires preparation and implementation of a Noise Control Plan. The Noise Control Plan would control and monitor noise during construction through measures such as temporary noise barriers, use of quieter equipment, and ongoing monitoring to ensure compliance with the FTA construction noise impact criteria. Construction would typically occur between the hours of 7:00 a.m. and 6:00 p.m., in accordance with the most conservative of the local ordinance restrictions among all involved cities. However, pursuant to Mitigation Measure

MM-NOI-1: Noise Control Plan, Metro may also obtain a variance to conduct construction outside of the hours of the local ordinance, if required, which could include nighttime construction for certain construction processes.

Although Mitigation Measure MM-NOI-1: Noise Control Plan requires compliance with the FTA's 1-hour  $L_{eq}$  construction noise thresholds and includes continuous monitoring and corrective actions, the Draft EIR acknowledges that temporary exceedances may still occur due to the variable nature of construction. For this reason, construction noise impacts were conservatively identified as significant and unavoidable, even with implementation of all feasible mitigation.

A similar conclusion is reached for construction vibration impacts. Without mitigation, the Elevated/At-Grade Alignment, the Trench Option, and the LPA could exceed FTA damage criteria (0.2 in/sec PPV) at 133 structures. The Hawthorne Option would affect 11 structures. Mitigation Measures MM-VIB-1: Vibration Control Plan through MM-VIB-3: Pre- and Post-Construction Surveys require preparation of a Vibration Control Plan, equipment restrictions near sensitive structures, and pre- and post-construction building surveys with repairs if damage is determined to be related to construction. With these measures, damage-related impacts would be reduced for the Trench Option, the Hawthorne Option, and the LPA, but one residual damage impact would remain under the Elevated/At-Grade Alignment due to impact pile driving near Grant Avenue. In all alignment scenarios, vibration annoyance during construction is anticipated to be significant and unavoidable, as not all equipment types could feasibly be replaced or modified to reduce perceptible vibration at nearby residences.

As stated on pages 3.6-34 and 3.6-48 of the Draft EIR, while it is unlikely for construction noise to result in noise-induced hearing loss for persons residing or working near construction zones, construction noise and vibration could increase stress at affected sensitive uses. Although sleep disturbances cannot entirely be ruled out, the potential for stress-increasing disturbances is anticipated to occur primarily during daytime hours, given the expected hours of construction discussed above.

As evidenced by the foregoing conclusions, the Draft EIR does not understate the effects of the Elevated/At-Grade Alignment and Options. The Metro Board will consider all environmental effects identified by the Draft EIR.

- 130-6 See MR-12: Emergency Access. As explained therein, the addition of light rail at the 182nd Street at-grade crossing would increase gate down times compared to existing conditions but would not prevent emergency access or create life-threatening delays. Emergency response times are influenced by various factors beyond traffic delays at specific crossings, including dispatch patterns and alternative routing options. For example, all areas on either side of the 182nd Street crossing could be accessed within a 0.5-mile by alternative grade-separated routes, unaffected by train frequency. While McCormick Ambulance Services currently operates near the 182nd Street at-grade crossing, as a private business, McCormick is not restricted to this location and could adjust its base location if future needs arise. Any such relocation of McCormick Ambulance Services, or a similar private business, would likely occur within already developed commercial or industrial properties, involving leasing or minor modifications to existing structures rather than new construction, and would utilize existing infrastructure

It should be noted that the LPA eliminates the need for an at-grade light rail crossing at

182nd Street with a short trench. The LPA would fully grade separate light rail, thereby preventing any light rail-related gate down times and would preserve current conditions where only occasional freight crossings affect the roadway.

130-7 See MR-13: Soil Stability and Sinkholes, as well as response to Comment 130-4.

As the City notes, the Draft EIR included a review of many reports and studies related to soils within the RSA, including areas near Ruxton Place and the Metro ROW, and assessed the likelihood of hazards. Based on this information (see in particular, Section 3.8-4.6), the Draft EIR concludes that the risk of soil instability, including subsidence or collapse, would be a less than significant impact. With respect to the two additional documents recommended by the City, the 2019 South Bay Galleria EIR pertains to a different development project on a separate site and does not contain information directly relevant to the light rail alignment. However, the South Bay Galleria EIR does describe the same general geologic conditions within the region as those presented in the Draft EIR for the proposed light rail extension. The South Bay Galleria EIR also describes findings from a geotechnical report specific to the Galleria site. While those findings are not directly applicable to this project, they recommend similar design and construction methods to those Metro would implement, such as excavating poor soils and replacing them with engineered fill in accordance with building code requirements.

The City did not provide the full Ninyo & Moore study, but rather an excerpt within their comment letter. The excerpt includes soil testing results from a single boring conducted at an unspecified location along the alignment. According to the excerpt, samples were collected within the upper 10 feet using a hand auger, with results indicating loose to medium silty and clayey sands; no groundwater was encountered to a depth of 10 feet. A lab result for a different location included in the excerpt indicated sandy material at that site. Although the exact locations of these borings are unknown, the soil descriptions are consistent with those identified in Section 3.8 of the Draft EIR and the 2023 Geotechnical Data Report, which supports the Draft EIR engineering plans and includes a review of past geotechnical investigations conducted within the project area.

Consideration of these two documents does not alter the conclusions of the Draft EIR, which adequately assesses the likelihood of geologic and seismic impacts in accordance with CEQA. No new data has emerged to suggest that the Draft EIR conclusions require revisions.

Finally, Metro coordinates with utility owners throughout the planning and design process to identify the precise location of pipelines and other infrastructure. This process includes evaluating potential conflicts and development design solutions such as relocation or protection-in-place, particularly in areas with known geotechnical constraints. This coordination is already underway and would continue as part of future design phases, consistent with standard Metro engineering practices and industry norms.

130-8 The City suggests that the Hawthorne Option may present more favorable subsurface conditions due to its location along the historic Red Car Route. However, although the Hawthorne Option traverses a different corridor than the Metro ROW alignments, soil conditions are similar and within the same geologic unit. As discussed in Section 3.8, Geology and Soils, of the Draft EIR, based on preliminary assessment of the geological conditions, soil stability concerns, including risks from unstable soils, are not anticipated along any of the alignments. The 2023 Geotechnical Data Report, prepared to support the Draft EIR engineering plans, reviewed past geotechnical investigations, including a Caltrans

boring log near Hawthorne Boulevard and 166th Street. This historic log indicates the soil types are similar to the soils along the Metro ROW, which are loose to medium sandy materials at upper depths and clayey sands farther down. There is no evidence to suggest that soil conditions along the Hawthorne Option are materially more stable than those along the Metro ROW. Even if the Red Car operated safely within Hawthorne Boulevard in the past, it was an at-grade system, whereas the Hawthorne Option would be entirely elevated and subject to different structural requirements, regardless of underlying geologic conditions. Finally, it should be noted that soils beneath the Metro ROW have performed without issues under the freight trains, which are considerably heavier than light rail trains.

130-9 See MR-11: Traffic Delay and Level-of-Service, which explains that, under CEQA, vehicle delay and intersection level of service (LOS) are no longer treated as environmental impacts pursuant to Senate Bill 743 and the CEQA Guidelines. Accordingly, the Draft EIR does not evaluate LOS as a significance criterion under CEQA. However, Metro also prepared a Transportation Detail Report (January 2023), published concurrently with the Draft EIR, to provide a more detailed operational analysis of the effects of the project alignments on traffic intersection operations as well as effects on bus route integration and public on-street parking. This report includes evaluation of the intersections near 182nd Street, the South Bay Galleria site, and the Redondo Beach Transit Center. These evaluations are based on observed traffic data and account for the functional importance of 182nd Street in the local circulation network. Thus, how a roadway is classified (such as the arterial classification) does not affect the adequacy of the analysis of the foregoing documents. Regarding cumulative impacts, the Draft EIR incorporates reasonably foreseeable growth in the project area, including high-density residential development identified in Redondo Beach's Housing Element and General Plan. These growth projections were reflected in the background traffic assumptions used in the transportation analysis.

130-10 As explained in Section 3.1-4 of the Draft EIR, CEQA no longer treats delay or congestion, including at intersections or due to rail crossings, as a significant environmental impact (see CEQA Guidelines Section 15064.3(a)), and the Draft EIR appropriately focuses on VMT and policy consistency. Section 3.1-4.1 of the Draft EIR analyzes whether the project would conflict with local transportation policies, including those intended to protect neighborhoods from cut-through traffic and unsafe speeds. The analysis concludes on page 3.1-45 that the Elevated/At-Grade Alignment would not conflict with such policies, as it would not preclude cities from implementing measures to deter cut-through traffic. Moreover, the project stations are locally serving and located on or near major corridors, which reduces the potential for new cut-through traffic patterns. The Trench Option and LPA would grade separate light rail from the roadway at 182nd Street.

Section 3.1-4.1 of the Draft EIR acknowledges that the Elevated/At-Grade Alignment could incrementally increase delay at 182nd Street due to the light rail crossing, but it does not rely on municipal actions to reach a conclusion of less than significant. Instead, the analysis finds that the project supports VMT-reduction goals by providing an alternative to vehicle trips and is consistent with general plan policies, such as Redondo Beach General Plan Goal G1 to "address the root cause of trip generation rather than simply reacting to the consequences."

Note that the Trench Option and LPA would both eliminate any light-rail-related traffic stoppage at 182nd Street, due to the previously mentioned grade separations from all roadways, thereby further reducing the potential for cut-through traffic.

- 130-11 As described in Chapter 2, Project Description, of the Draft EIR, the existing freight crossings at 170th and 182nd Street would feature freight safety crossing gates and other crossing protections, and pedestrian upgrades on both sides of the tracks and street, which would be an improvement over existing conditions. For bicyclists, the design ensures that the railroad tracks would be crossed at a perpendicular angle, which minimizes the risks of tires catching in the gaps, a key consideration for bicycle safety. The LPA would grade separate light rail at 170th and 182nd Streets eliminating any new at-grade crossings for light rail at these intersections and further reducing potential safety concerns for pedestrians and bicyclists.
- 130-12 See response to Comment 130-10 regarding how the Draft EIR evaluated the potential for the Elevated/At-Grade Alignment to conflict with local and regional programs, ordinances, or policies addressing the circulation system (see Section 3.1-4.1 of the Draft EIR). The analysis considers the effect of train frequency and crossing activity on intersection operations, including at Inglewood Avenue and 182nd Street. Under the Elevated/At-Grade Alignment, light rail would be grade-separated at Inglewood Avenue but would cross 182nd Street at-grade, where additional train activity could result in intermittent delays due to gate closures. The Draft EIR concludes that this alignment would not conflict with local or regional transportation plans, in part because it does not preclude cities from implementing cut-through traffic minimization efforts and supports broader VMT-reduction goals. For reference, the Trench Option, Hawthorne Option, and LPA would grade separate the light rail from all roadways, avoiding these types of delays altogether.
- 130-13 Noise monitoring locations are shown in Figure 3.6-7 and Figure 3.6-8 of the Draft EIR. To identify existing noise conditions near the project, Metro conducted noise measurements at multiple representative locations, including locations 17 and 18 on Condon Avenue, south of Artesia Boulevard, and location 23, south of 182nd Street at Ralston Lane and Firmona Avenue. Additional noise measurements were taken at locations 20, 24, 25, 26, and 27, all of which are south of 182nd Street.
- The noise measurement locations were selected in accordance with the FTA's Transit Noise and Vibration Impact Assessment Manual (2018), which permits representative measurements at locations with similar noise conditions to other sensitive receptors in the vicinity. As discussed on page 3.6-17 of the Draft EIR under Section 3.6-2.2.1, Existing Noise Conditions, this approach allows noise assessments to capture accurate baseline data for analysis without the need for measurements at every individual site. The methodology and monitoring locations were chosen to ensure an accurate representation of the ambient noise environment in the project area.
- 130-14 See response to Comment 130-5 and MR-3: Operational Noise Project Features and Mitigation Measures. Metro would install all the required Quiet Zone freight improvements and equipment and is committed to supporting the cities with the FRA application, although it is the cities' decision on whether to pursue it.
- 130-15 See MR-2: Operational Noise Analysis and Impact Thresholds for a detailed discussion on how noise and vibration impacts were evaluated in the Draft EIR. Metro, as the CEQA lead agency, has the discretion to determine the appropriate significance criteria for the project and has utilized the FTA's noise impact criteria, which was specifically developed to address transit noise based on well-documented criteria and research on human response to community noise.

The FTA methodology is appropriate because it accounts for both existing ambient noise conditions and the sensitivity of nearby receptors. In contrast, fixed noise level limits, such as those established by the Redondo Beach Municipal Code (RBMC) Section 4-24.301, do not reflect ambient conditions and may already be exceeded in urban areas. For example, For instance, Table 3.6-17 of the Draft EIR shows that existing ambient noise levels at the many sensitive receptor locations near the Trench Option already exceed the RBMC standards, even without the project.

Regarding operational hours, Metro's light rail system, consistent with regional transit standards, may operate during early morning and late evening hours. These service hours are accounted for in the Draft EIR's analysis, which evaluates whether the noise generated would result in substantial adverse impacts.

With respect to vibration, the Draft EIR applies FTA criteria that distinguish between human annoyance and structural damage. These criteria are tailored to transit projects and reflect the type and duration of vibration exposure. Where vibration thresholds are predicted to be exceeded, mitigation measures have been identified.

Importantly, the project does not violate RBMC Section 4-24.301. State law preempts the application of local zoning and land use regulations to Metro on property it owns or operates (see *Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996). In fact, RBMC Section 4-24.604 expressly states that the City's noise standards "shall not apply to any activity the regulation of which has been preempted by state or federal law." Because the Metro ROW is owned by Metro and the project is a state-authorized public transit use, these standards do not apply.

- 130-16 The mitigation measures that are proposed in the Draft EIR are designed to address vibration impacts for the life of the project.

As detailed in Sections 3.6-5 and 4.5-3.6.4 of the Draft EIR, the Elevated/At-Grade Alignment, Trench Option, and LPA (the 170th/182nd Grade-Separated Light Rail Transit Alternative) would be subject to Mitigation Measures MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats to reduce vibration generated by light rail and freight operations. These measures are designed to achieve at least a 10 dB vibration reduction and ensure that the resulting vibration levels remain below FTA criteria (80 VdB for freight and 72 VdB for light rail). The final design would verify the specific locations where these components are needed through a site-specific Detailed Vibration Assessment, consistent with FTA guidance, Section 6.5. See MR-6: Vibration Analysis During Final Design.

Each mitigation component is designed for long-term durability. Similar track components to address vibration are widely used in modern rail systems and are engineered for extended service life. Based on general manufacturer specifications and industry best practices, these components are anticipated to remain effective for decades under normal operating conditions.

Furthermore, Metro has established track inspection and maintenance protocols to ensure the continued effectiveness of the track system, including low-impact frogs, resilient fasteners (e.g., rail clips shoulders, elastic rail clips, and elastomer pads) and ballast mats. Per these protocols, low-impact frogs would be inspected for wear and resurfaced or

replaced as needed, resilient fasteners would be regularly checked to ensure they remain securely fastened and repaired or replaced as needed, and ballast mats would be assessed for wear and reinforced or replaced when necessary. Additionally, rail lubricators would be placed and maintained where excessive rail wear or wheel-rail friction may occur. This standard monitoring and maintenance would further ensure that the mitigation measures, which are already designed for long-term durability, remain effective in minimizing vibration impacts throughout the life of the project.

Additionally, the City states that “there are already vibration impacts as a result of the existing freight operations.” Under CEQA, existing effects from current freight operations do not constitute an environmental impact. Rather, such effects are part of the baseline physical conditions against which the Draft EIR evaluates the effects of the project (see CEQA Guidelines Section 15125(a)). Based on the age of the existing freight rail tracks and freight rail historical practices, the existing freight rail tracks within the existing Metro ROW are reasonably assumed to include little to no vibration-reducing features. The vibration-reducing features incorporated as mitigation for the project would, therefore, represent an improvement over the existing baseline conditions, further reducing vibration effects within the corridor.

- 130-17 The FTA general assessment method used in the Draft EIR is designed to be conservative, meaning it is intended to ensure that vibration impacts are not underestimated at this preliminary stage. Pursuant to Mitigation Measures MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats, during final design, a Detailed Vibration Assessment would be conducted, which would include site-specific testing and engineering to tailor the final mitigation measures to actual conditions. This detailed assessment during final design would identify, if necessary, refinements of the mitigation methods to ensure that vibration levels do not exceed the FTA significance criteria for vibration impacts (80 VdB for freight and 72 VdB for light rail). In compliance with CEQA, in the unlikely event that the Detailed Vibration Assessment identifies any new significant impacts not previously disclosed, or if previously disclosed impacts are found to be more substantially more severe, Metro would assess whether supplemental CEQA review is required. However, the conservative approach taken in the Draft EIR makes this unlikely, as the general assessment method likely overstated impacts and the mitigation measures identified in the Draft EIR are adaptable and expected to be sufficient to achieve the required vibration reduction levels. See MR-6: Vibration Analysis During Final Design.
- 130-18 The comment is correct. As detailed on page 3.4-55 in Section 3.4, Air Quality, of the Draft EIR, the Trench Option would have a significant and unavoidable impact during construction related to NOx emissions.
- 130-19 Metro acknowledges that construction activities would generate dust and has conducted a detailed air quality analysis of particulate matter impacts. Fugitive dust emissions associated with construction activities were estimated using CalEEMod, which is a model approved by SCAQMD. The model estimates fugitive dust emissions from heavy-duty equipment movements on unpaved roads, truck loading, and stockpiles. While the overall project is estimated to take six years of construction along the corridor, the duration of construction tasks would be shorter at individual locations. The analysis, starting in Section 3.4-4.3.1, Air Quality, of the Draft EIR, on page 3.4-33, demonstrates that fugitive dust (PM<sub>10</sub>) emissions would not exceed the regional significance threshold established by SCAQMD. In addition, the analysis starting in Section 3.4-4.1.1 of the Draft EIR on page 3.4-45 demonstrates that

PM<sub>10</sub> emissions would not exceed the localized significance threshold established by SCAQMD, even at peak construction phases. Page 3.4-25 of the Draft EIR identifies the best available control measures that project contractors would be required to implement. These requirements would substantially control fugitive dust—by between 36% and 91%, depending on activity—and other air pollutant emissions during all construction activities. While it is inevitable that construction activities would generate some level of fugitive dust, based on guidance promulgated by SCAQMD, these impacts would remain at a less-than-significant level. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality for additional information.

- 130-20 Section 3.9, Hazards and Hazardous Materials, and Section 4.5-3.11.1 (evaluation of the LPA, the 170th/182nd Grade-Separated Light Rail Transit Alternative) of the Draft EIR, analyzes the potential for the project to create a hazard through the accidental release of hazardous materials into the environment, which includes an analysis of existing oil and gas pipelines (specifically, see Section 3.9-4.2 of the Draft EIR). As discussed in Section 3.9-4.2.1 of the Draft EIR, Metro obtained as-built drawings from the utility owners and has developed preliminary plans for each existing utility line, which could include relocation or protection-in-place. In the next phase of design, Metro would conduct additional surveys and potholing to confirm the utility locations and finalize relocation or protection requirements to prevent conflicts during construction. Project Feature PF-US-1: Utility Identification and Coordination requires Metro to coordinate closely with utility owners prior to construction to identify appropriate protection or relocation measures and to comply with all applicable safety protocols. This coordination includes taking into account the material condition of each utility, including any vulnerabilities such as aging or brittleness.

Based on the above, the Draft EIR concludes the potential impact related to oil and gas pipelines for the Elevated/At-Grade Alignment, Trench Option, and LPA would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety.

- 130-21 See MR-8: Light Rail and Freight Train Safety.
- 130-22 Pipeline location is considered sensitive information for security reasons and, therefore, is not disclosed within public environmental documents. However, as discussed in Section 3.9-4.2.1, Hazards and Hazardous Materials, of the Draft EIR, Metro obtained as-built drawings from the utility owners, and developed preliminary plans for each utility line, which could include relocation or protection-in-place. The project would not exacerbate the need for pipeline maintenance or increase risks to pipeline integrity. Ongoing maintenance or repair would be the responsibility of the pipeline owners, who follow regulatory standards for inspection and maintenance to ensure safety. See MR-7: Utility Relocation and Hazardous Materials Safety.
- 130-23 Section 3.7, Biological Resources, of the Draft EIR, analyzes impacts to urbanized avian species protected under federal and state regulations that have potential to occur within the RSA (specifically, see Section 3.7-4.1.1). This includes resident birds of prey such as red-tailed hawks and great-horned owls. Portions of the RSA provide urbanized avian species with both suitable breeding and foraging habitat in the form of trees, vegetation, and man-made structures. Adequate mitigation is included through Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys, and MM-BIO-3: Roosting Bat Restrictions and Survey Requirements, which all outline specific

- preventative and protective actions that would mitigate impacts to local wildlife, including protected hawk and owl species.
- 130-24 See response to Comment 130-23. Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys, and MM-BIO-3: Roosting Bat Restrictions and Survey Requirements outline specific actions that would mitigate potential impacts to local wildlife. These mitigation measures are based on established best practices for environmental protection and are specially designed to avoid or minimize potential impacts to protected wildlife with potential to occur in the RSA, ensuring those impacts are reduced to less-than-significant levels. The comment does not specify any additional mitigation measures that the Metro should consider or information suggesting that the existing mitigation measures would not be effective at reducing impacts to less than significant.
- 130-25 First/Last Mile (FLM) projects and the C Line (Green) Extension to Torrance project are planned and conducted as parallel but distinct processes, with independent community engagement efforts and recommendations. Metro's First/Last Mile Guidelines (2021), described on page 3.15-5 of the Draft EIR, define Metro's role in assisting with the planning, design, and implementation of FLM improvements for transit capital projects. As set forth in the FLM Guidelines, although Metro provides early-phase planning support for FLM improvements, the responsibility for the design, environmental clearance, implementation, and maintenance of those improvements ultimately lies with the local jurisdictions, which serve as the lead agencies for these projects. FLM improvements extend beyond the immediate station area (up to a half-mile for pedestrian infrastructure and up to three miles for bicycle improvement) and are, therefore, considered separate from the larger transit project. Implementation of the FLM projects is not dependent on the C Line (Green) Extension to Torrance project, nor is the C Line (Green) Extension to Torrance project dependent on the FLM projects for implementation.
- 130-26 Metro would undertake a bus-rail interface study prior to the start of revenue service to determine if adjustments are needed to existing or planned bus routes to align with the service provided by the light rail line extension. Metro would continue to coordinate with the South Bay Social District on connections between future development and the rail station.
- 130-27 The City's reference to the "Del Amo Mall" is assumed to mean the Del Amo Fashion Center, which is located nearly one mile to the southwest of the Torrance Transit Center Station. Due to this distance, the project does not propose new methods of dedicated connectivity to the Del Amo Fashion Center. However, if the City intended instead to refer to the South Bay Galleria or other nearby commercial areas, the Draft EIR does address pedestrian connectivity in that vicinity. See Section 2.3 of the Draft EIR.
- 130-28 The project does not include parking at the South Bay Galleria Station. Based on Metro's system experience, the majority of rail passengers do not drive to stations. Metro's published data from its annual On-Board Customer Satisfaction Surveys show that at nearly all stations, most riders access the train by walking, bicycling, or transferring from buses. Even at stations where parking is provided, most station parking is not fully utilized under normal circumstances. Thus, the proposed South Bay Galleria Station is expected to have a similar pattern of people accessing the station by foot, bicycle, or bus.

- 130-29 Corrections and additions are published in Chapter 4, Corrections and Additions, of the Final EIR. The revisions amplify and clarify the information in the Draft EIR, but do not include significant new information, as defined by CEQA Guidelines Section 15088.5(a), such as evidence of a new significant impact or a substantially more severe significant impact beyond what was identified in the Draft EIR.
- 130-30 Chapter 4, Evaluation of Alternatives, of the Draft EIR, provides details on the No Project Alternative and explains the basis for any significant and unavoidable impact conclusions.
- 130-31 The City’s support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. The Metro Board has not yet selected a final alignment or approved the project. Although the fully grade-separated LPA, which follows the Metro ROW, has been identified for the purposes of the Final EIR, all options and alternatives evaluated in the Draft EIR remain under consideration. See MR-1: Selection of Alternatives.
- 130-32 See MR-1: Selection of Alternatives, which explains the reasons why the Metro Board selected the Hybrid Alternative as the LPA. The Hawthorne Option would require the permanent acquisition of several private properties to construct and operate the elevated light rail, particularly where the alignment transitions from the Metro ROW to public streets. During the advanced conceptual engineering phase, Metro worked to minimize impacts to private properties in the development of all alignment options, including the Hawthorne Option. Metro has designed the project to avoid displacement of residents. It would not be feasible to construct and operate the Hawthorne Option alignment without permanently acquiring non-residential properties, which would in turn affect their associated businesses. The properties affected are summarized in the 2023 Real Estate Acquisition Report. As discussed therein, the Hawthorne Option would require permanent full acquisition of seven commercial properties and permanent partial acquisition of five commercial properties between Marine Avenue and 190th Street.
- 130-33 See MR-11: Traffic Delay and Level-of-Service. Section 3.2-4.2 of the Draft EIR evaluates the project’s consistency with any land use plan, policy, or regulation *adopted for the purpose of avoiding or mitigating an environmental effect*. Under CEQA, “automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant on the environment.” (Public Resources Code Section 21099(b)(2)). Note that Metro published the 2023 Transportation Detail Report concurrently with the Draft EIR. The 2023 Transportation Detail Report describes the estimated future conditions in 2042 without the project and analyzes the traffic circulation effects (LOS) on intersection delay and queues for the project.
- 130-34 The 2023 Ridership Report was published concurrently with, but not as part of, the Draft EIR. The 2023 Ridership Report provides information regarding projected ridership for the project.
- 130-35 If the No Project Alternative or a non-rail alternative were ultimately approved, Metro would need to reprogram the funds under Measure R and Measure M. It is likely that Metro would lose the \$231.3 million TIRCP state grant.
- 130-36 Metro has not analyzed the use of the Metro ROW for standalone active transportation projects (e.g., dedicated bike or pedestrian paths) in the absence of the proposed light rail project. The current environmental analysis is focused on evaluating the impacts of the

- proposed transit project and its options and alternatives. While the Metro ROW light rail alignments would include pedestrian and bicycle improvements to enhance multimodal access, broader re-use of the corridor for other active transportation would not meet most of the basic objectives of the project and would require a separate planning effort outside the scope of this EIR.
- 130-37 Metro does not have this information. The comment does not raise significant environmental issues requiring a response under CEQA Guidelines section 15088(a) or otherwise address the adequacy of the Draft EIR.
- 130-38 The comment does not raise any significant environmental issues or address the adequacy of the Draft EIR. See MR-9: Light Rail Security for more information on the security of Metro’s light rail facilities.
- 130-39 CEQA does not require an analysis of safety in terms of crime, and therefore, the Draft EIR does not make any conclusions regarding this topic. Metro is committed to integrating safety into all Metro rail operations. See MR-9: Light Rail Security for more information on Metro’s commitment to safety.
- 130-40 Objective 10.10 of Section 4.0, Environmental Hazards/Natural Hazards, of the City of Redondo Beach General Plan is to: “Minimize the noise effects of railroad transit (freight and passenger) on residential uses and other sensitive land uses.” The project is consistent with this objective because it includes project features and would implement mitigation measures to reduce both noise from light rail operation and noise from the combined freight track relocation and light rail operations. Specifically, Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs would minimize noise associated with light rail operation. Additionally, Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment would reduce noise associated with relocation of the freight tracks. Notably, as discussed in Section 3.6, Noise and Vibration, of the Draft EIR, most of the noise associated with freight trains is caused by their warning horns, which produce noise levels of approximately 110 dBA. Pursuant to Project Feature PF-NV-1: Quiet Zone Equipment Installation, the project would install the equipment necessary to allow designation of a quiet zone, which would enable local jurisdiction to establish quiet zones. The establishment of a quiet zone would eliminate freight horn soundings within a quarter-mile of the railroad crossings, from Inglewood Avenue to 182nd Street within the City of Redondo Beach. In most instances, with the establishment of a quiet zone, freight trains would actually be quieter than existing conditions, even though the tracks would be in closer proximity to some sensitive receptors. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.
- 130-41 Policy 10.10.1 of the City of Redondo Beach General Plan requires the City to work with railroad operators to properly maintain lines and operational restrictions during early morning and late evening hours to reduce adverse noise impacts in residential and other noise-sensitive areas. The project would not preclude the City from implementing this policy. To the contrary, the project includes mitigation measures and project features that address noise levels associated with light rail operations and the relocation of the freight tracks. The ROW alignments would enable the City of Redondo Beach to establish a quiet zone, which would reduce adverse noise impacts in residential and other noise sensitive areas by eliminating horn soundings within a quarter-mile of the railroad crossings extending from Inglewood Avenue to 182nd Steet, See also MR-2: Operational Noise

Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

- 130-42 Metro takes safety seriously and has incorporated design features to prevent unauthorized access to the light rail guideway. Among other things, the project would include physical barriers along the entire light rail guideway, restricting access into the light rail guideway. While Metro's safety features are primarily focused on people, these physical barriers would also provide a level of protection for terrestrial pets and wildlife by preventing access to the operational rail tracks. See MR-8: Light Rail and Freight Train Safety.
- 130-43 Based on their age and historical practices for freight rail, it is reasonable to assume that the existing freight rail tracks within the existing Metro ROW include little to no vibration-reducing features. In contrast, the project would include vibration mitigation measures for freight, including resilient fasteners (Mitigation Measure MM-VIB-5: Resilient Fasteners) and ballast mats (Mitigation Measure MM-VIB-6: Ballast Mats), which, as discussed in Section 3.6-6.2.2, Noise and Vibration, of the Draft EIR, would reduce vibration levels to below the FTA threshold for vibration annoyance. These measures would reduce vibration impacts on nearby sensitive receptors to less than significant with mitigation, including in high-density residential areas. See MR-5: Vibration Impact Types and Impact Thresholds.
- 130-44 See responses to Comments 22-57 to 22-59. As described in Section 3.3, Aesthetics, of the Draft EIR, lighting for the project would be installed consistent with the applicable Metro Design Standards, which prioritize safety while minimizing impacts to nearby sensitive receptors. The lighting associated with the trains themselves, such as headlights, would be designed to ensure visibility and safety during operation but would be unlikely to create significant light and glare impacts due to its limited and intermittent nature. Furthermore, the light rail is grade-separated for the Trench Option, Hawthorne Option, and LPA. The only location where the trains are not grade-separated from roadways is at 170th and 182nd Streets for the Elevated/At-Grade Alignment. Lighting at these two intersections and along the light rail tracks would adhere to applicable safety and design standards, with measures in place to limit glare and light spillover to adjacent properties. The lighting and materials would be similar to what is used in other Metro light rail projects currently in operation, which have demonstrated minimal concerns or complaints from nearby communities. Non-reflective surfaces would be used as feasible, and in compliance with applicable local regulations and Metro Design Standards.
- 130-45 The High-Frequency Bus Alternative is less costly and was identified as the environmentally superior alternative, because it would result in fewer significant environmental impacts compared to the rail alignments. However, it would not achieve the same capacity, speed, or reliability as light rail transit. Unlike the light rail options, the High-Frequency Bus Alternative would operate on congested city streets, reducing travel time and reliability. Ridership for the High-Frequency Bus Alternative was projected to be very low, with only 4,000 new trips generated, compared to 11,500 new trips for the Elevated/At-Grade Alignment, Trench Option, and LPA. Compared to light rail, the High-Frequency Bus Alternative is not able to significantly reduce VMT and associated air pollution and GHG emissions.

The High-Frequency Bus Alternative was evaluated as a distinct transit mode with operational characteristics tailored to maximize its effectiveness within the corridor. Unlike the Elevated/At-Grade Alignment and Options, which would become part of the regional rail network, the High-Frequency Bus Alternative was proposed to have more frequent stops to

reflect the typical operating characteristics of bus transit, which is better suited for serving local trips and is why stop frequency is much higher. The High-Frequency Bus Alternative was defined as a rapid bus service that would travel on the existing roadway network, with stops at major intersections like other rapid routes within the Metro bus system. Evaluating a High-Frequency Bus Alternative with only two stops would not provide an accurate comparison, because reducing stops would diminish the accessibility benefits of bus transit, which is designed to serve more localized trips compared to light rail. Additionally, reducing the bus stop frequency to only two stops would further reduce the ridership. Therefore, there would be no justification for providing the service. The High-Frequency Bus Alternative, as evaluated in the Draft EIR, ensures that each alternative is assessed realistically based on its inherent capabilities and typical use case and providing decision-makers and the public with the most useful comparison. Finally, even if Metro were to consider a High-Frequency Bus Alternative with only two stops, that alternative would still not match the light rail's capacity, reliability, or speed, as buses would continue to operate on congested streets.

Should a light rail alignment not be approved for implementation, Metro would determine how to reprogram the funding at a future date.

- 130-46 This comment duplicates a portion of Comment 130-6. See the response to that comment.
- 130-47 This comment duplicates a portion of Comment 130-6. See the response to that comment.
- 130-48 This comment duplicates a portion of Comment 130-7. See the response to that comment.
- 130-49 This comment duplicates Comment 130-8. See the response to that comment.
- 130-50 This comment duplicates Comment 130-9. See the response to that comment.
- 130-51 This comment duplicates Comment 130-10. See the response to that comment.
- 130-52 This comment duplicates Comment 130-11. See the response to that comment.
- 130-53 This comment duplicates Comment 130-12. See the response to that comment.
- 130-54 This comment duplicates Comment 130-14. See the response to that comment.
- 130-55 This comment duplicates a portion of Comment 130-15. See the response to that comment.
- 130-56 This comment duplicates Comment 130-16. See the response to that comment.
- 130-57 See MR-10: Changes to Community Character and MR-9: Light Rail Security, as well as response to Comments 130-6 to 130-16 and 130-46 to 130-56.
- 130-58 This comment duplicates Comment 130-30. See the response to that comment.
- 130-59 This comment duplicates Comment 130-31. See the response to that comment.
- 130-60 This comment duplicates Comment 130-33. See the response to that comment, as well as MR-11: Traffic Delay and Level-of-Service.
- 130-61 This comment duplicates Comment 130-34. See the response to that comment.
- 130-62 This comment duplicates Comment 130-23. See the response to that comment.
- 130-63 The comment duplicates a portion of Comment 130-15. See the response to that comment.

- 130-64 See response to Comment 130-7, which discusses the applicability of the analysis in two documents (the 2019 South Bay Galleria EIR and a Ninyo & Moore study) to the analysis in the Draft EIR.
- 130-65 This comment duplicates Comments 130-18 and 130-20. See the responses to those comments.
- 130-66 This comment duplicates a portion of Comment 130-21. See the response to that comment, as well as MR-8: Light Rail and Freight Train Safety.
- 130-67 This comment duplicates a portion of Comment 130-24. See the response to that comment. The discussion contained therein would similarly apply to the Draft EIR's analysis and conclusion of the potential for the Hawthorne Option to result in potential impacts to protected wildlife species.
- 130-68 This comment duplicates Comment 130-25. See the response to that comment.
- 130-69 This comment duplicates Comment 130-26. See the response to that comment.
- 130-70 This comment duplicates Comment 130-27. See the response to that comment.
- 130-71 This comment duplicates Comment 130-28. See the response to that comment.
- 130-72 This comment duplicates Comment 130-35. See the response to that comment.
- 130-73 The City submitted Comments 130-73 to 130-86 on Holly Osborne's behalf.

The project is designed to fit within the Metro ROW, including in areas where the Metro ROW narrows to 75 feet, and avoid displacement of residents. Regarding utilities, Metro has identified the locations of pipelines within the Metro ROW, using as-builts plans provided by the utility owners. Although the exact locations are not depicted on figures in the Draft EIR due to the sensitive nature of the information, they have been accounted for in the project's conceptual design and Metro would continue to coordinate with utility owners during the next phases of design. The transition of the Metro ROW from 100 feet to 75 feet has been considered in the project design to ensure compatibility with the inclusion of three sets of tracks and existing utilities without displacing residents. Further refinement of the project design, including detailed engineering, would continue during the final design phase to continue to ensure the project fits within the existing Metro ROW. It is expected that the project and associated relocations could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority.

- 130-74 The cross-sections are intended to illustrate the approximate configuration of major project elements, and the exact widths would vary slightly along the alignment. However, the location of the light rail guideway and freight track as depicted in the cross-section as accurate for the Draft EIR, with the freight track shifting up to 14 feet to the west in this segment. In Chapter 2, Description of the Locally Preferred Alternative, of this Final EIR, a version of this cross section at a specific point was updated to reflect the design of the LPA. As included in the notes accompanying all cross-sections within Chapter 2, Project Description, of the Draft EIR, the dimensions of project elements are preliminary and are subject to confirmation in future phases of design. Metro has prepared a property boundary survey to confirm boundary lines of the ROW in the project area. The findings of this survey

- are reflected in Appendix B, Select Advanced Conceptual Engineering Drawings – Locally Preferred Alternative, of the Final EIR.
- 130-75 The proposed multi-use recreational path is planned to be approximately 20 feet wide, accommodating both pedestrians and cyclists. The exact design, including the allocation of space for the bike and pedestrian path, landscaping, and lighting, would be determined in the next phase of design in coordination with local jurisdictions. Metro is committed to ensuring the path is safe, functional, and meets community needs while maintaining compatibility with the available space. More specific details of the proposed multi-use recreational path, such as the placement and type of trees or other landscaping features, would be carefully evaluated to balance shade, aesthetics, and usability of the path.
- 130-76 As noted in the comment, the freight track would remain in its existing location from south of 172nd Street to Artesia Boulevard, approximately 25 feet from the edge of the Metro ROW, and at 170th Street, the freight track would be shifted approximately three feet to the west. Note that the Draft EIR cross-sections are intended to depict typical configurations of the project, and cannot represent every scenario along the alignment, as the exact track placement varies throughout the corridor. There is adequate space within the Metro ROW to accommodate all relocated utilities within the corridor without displacing residents. It is expected that the project and associated relocations could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority. Since the publication of the Draft EIR, Metro has completed a property boundary survey. The ROW dimensions are illustrated in Chapter 2, Description of the Locally Preferred Alternative and shown in Appendix B, Select Advanced Conceptual Engineering Drawings - LPA, of the Final EIR, for more detailed cross-sections and plans.
- 130-77 The distance between the light rail tracks and freight track in the area between 172nd Street and Artesia Boulevard is similar to the design further north. At 172nd Street, the light rail tracks would be shifted slightly to the east, compared to the segment at 170th Street, to maintain adequate separation of the freight tracks and alignment with the bridge. Based on the current stage of design, maintenance access in this area is adequate to accommodate necessary operational and safety needs. It is expected that the project and associated relocations could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority.
- 130-78 The commenter refers to BNSF Railway’s “Utility Accommodation Policy,” which applies to pipelines located on property under the jurisdiction of BNSF. As noted in the policy, its provisions only apply “within the property under the jurisdiction of BNSF” (see page 2-1 of the “Utility Accommodation Policy”). BNSF does not own the Metro ROW in this section of the rail corridor; it only has operating rights on the tracks. Therefore, the provisions outlined in the BNSF policy do not apply in this segment of the corridor. Metro would coordinate with BNSF and utility owners on the layout of all pipeline relocations and protections in place are designed and constructed to ensure safety. See MR-7: Utility Relocation and Hazardous Materials Safety.
- 130-79 The commenter references the 2003 policy paper “Shared-Use Corridors: Survey of Current Practices and Recommendations for the Future,” which states that a separation distance of 25 feet is “normally desired” by the FRA. However, the paper also acknowledges that many

existing freight corridors do not provide room for such a distance, with track centers in some shared-use corridors as close as 13 feet, often without fencing. Although the separation distance between the project alignment and BNSF tracks has not yet been finalized, the distance between project alignment and freight tracks would exceed the aforementioned 13-foot separation observed in other shared-use corridors. The project alignment would also allow for sufficient space for an intrusion detection barrier, and the new light rail tracks would be either elevated or enclosed in a trench along portions of the alignment. Since the paper's 2003 publication, new rules and regulations governing rail safety have been adopted, including the Rail Safety Improvement Act of 2008 and associated regulations, as well as requirements for positive train control (PTC) systems, which use advanced safety technology to automatically control train movements to prevent accidents and improve overall safety. It is expected that the project and associated relocations could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority. See MR-8: Light Rail and Freight Train Safety.

130-80 The comment requested a sketch of the area immediately south of Artesia Boulevard. The plans and cross-sections included in the Draft EIR represent the conceptual design at the time of publication, which remains sufficient for the environmental analysis. Metro published the 2023 Urban Design Report, which provides additional design details, including cross-sections and renderings to illustrate the project's layout in the corridor. Metro has provided a section of the segment of the Metro ROW between Artesia Boulevard and Grant Avenue in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR (Figure 2.3-8), and Appendix B, Select Advanced Conceptual Engineering Drawings – Locally Preferred Alternative, which clarifies that the Metro ROW is 100 feet wide. Metro would continue to refine the project design during later engineering phases, and additional materials may be developed at that stage.

130-81 Figure 2.3-6 of the Draft EIR shows a view that is south of Artesia Boulevard as the tracks approach Grant Avenue. In response to this comment, the caption of this figure has been revised in Section 4.3, Corrections and Additions, of the Final EIR. This revision does not change the conclusions of the Draft EIR.

The configuration of the tracks near Grant Avenue reflects the spatial adjustments needed to transition to the Redondo Beach Transit Center Station, located 840 feet south of Grant Avenue from the centerline of the station to the centerline of the roadway. The track separation increases in this area to accommodate the station platform and related infrastructure. The steep embankment referenced by the commenter is outside the light rail guideway and is not part of the operational design. Access from adjacent properties to the Metro ROW would be restricted as part of the project's safety measures.

130-82 Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, describes soil excavation and fill. It is anticipated that the majority of soil excavated would be reused on-site for fill.

130-83 Maintenance access, as shown in Figure 2.3-6 of the Draft EIR, would be within the Metro ROW, to which the "easement/maintenance access" label was intended to refer. The area shown in Figure 2.3-6 was not intended to suggest the appropriation of private property or the creation of a new easement on the homeowners' backyards. Figure 2.3-6 has been revised in Section 4.3, Corrections and Additions, of the Final EIR to remove the "Easement."

- Utilities would be located underground within the Metro ROW, and the surface area would also be used for maintenance access.
- 130-84 The height of the retained fill varies throughout the project corridor, depending on the specific location and design requirements. In the area shown in the referenced cross-section Figure 2.3-6 from the Draft EIR, the height of the retaining wall would be approximately 15 feet, which is consistent with the height of the existing freight track, as measured from the ground level of the houses.
- 130-85 Repeating the analysis for the Trench Option is not necessary because the Draft EIR already includes a full evaluation of the Trench Option. Based on preliminary designs, the Trench Option is feasible, including with respect to accommodating utilities, freight operations, and the light rail tracks within the existing Metro ROW, while ensuring that safety and operational standards are met.
- 130-86 Since the publication of the Draft EIR, Metro has completed a property boundary survey. Section 4.3, Corrections and Additions, of the Final EIR, contains some revised cross-sections for Chapter 2, Project Description, of the Draft EIR. These revisions do not change the conclusions of the Draft EIR.
- 130-87 The City has submitted Comments 130-87 to 130-89 on Niki Negrete-Mitchell's behalf.
- The comment does not address the adequacy of the Draft EIR. Section 3.4-4.2, Air Quality, of the Draft EIR evaluates the potential for the project to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. See the analyses and conclusions therein, as well as MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.
- 130-88 See response to Comment 130-23.
- 128-89 See MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety.
- 130-90 The City has submitted comments on Mark Nelson's behalf, which are duplicative of Submission 1970 (which Mark Nelson submitted separately to Metro). See responses to Comments 1970-1 through 1970-17.
- 130-91 See response to Comment 130-90.
- 130-92 See response to Comment 130-90.
- 130-93 See response to Comment 130-90.
- 130-94 See response to Comment 130-90.
- 130-95 See response to Comment 130-90.
- 130-96 See response to Comment 130-90.
- 130-97 See response to Comment 130-90.
- 130-98 See response to Comment 130-90.
- 130-99 See response to Comment 130-90.
- 130-100 See response to Comment 130-90.

- 130-101 See response to Comment 130-90.
- 130-102 See response to Comment 130-90.
- 130-103 See response to Comment 130-90.
- 130-104 See response to Comment 130-90.
- 130-105 See response to Comment 130-90.
- 130-106 See response to Comment 130-90.
- 130-107 See response to Comment 130-90.
- 130-108 The City has submitted comments on Kevin Mitchell's behalf, which are duplicative of submission 122 (which Kevin Mitchell submitted separately to Metro). See responses to Comments 122-1 through 122-6.
- 130-109 See response to Comment 130-108.
- 130-110 See response to Comment 130-108.
- 130-111 See response to Comment 130-108.
- 130-112 See response to Comment 130-108.
- 130-113 See response to Comment 130-108.
- 130-114 The City has submitted the comment on Kevin Mitchell's behalf. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.
- 130-115 The City has submitted Comments 130-115 and 130-116 on behalf of Nancy Skiba.
- While the Blue Zones Initiative is not a regional plan as defined by CEQA Guidelines Section 15125(d), the underlying concerns regarding long-term health effects of environmental stressors such as noise are acknowledged. Section 3.6, Noise and Vibration, of the Draft EIR evaluates construction and operational noise and vibration impacts in accordance with FTA guidance. This guidance is widely accepted for assessing noise and vibration impacts of transit and includes thresholds intended to protect quality of life and avoid adverse effects to sensitive receptors, which include preventing conditions like sleep disturbance and annoyance.
- See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.
- 130-116 See response to comment 130-115. The City's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.
- 130-117 The City has submitted Comments 130-117 to 130-130 on behalf of Niki Negrete-Mitchell.
- The screenshots from the Ninyo & Moore study are noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 130-7, which discusses the applicability of the analysis of the Ninyo & Moore study to the analysis in the Draft EIR, as well as MR-13: Soil Stability and Sinkholes.
- 130-118 The image of the owl is noted. All comments have been shared with the Metro Board for their consideration. See Section 3.7, Biological Resources, of the Draft EIR, which includes an

- evaluation of potential impacts to protected wildlife species, including protected birds and raptors.
- 130-119 See response to Comment 130-7, which discusses the applicability of the analysis of the Ninyo & Moore study to the analysis in the Draft EIR, as well as MR-13: Soil Stability and Sinkholes.
- 130-120 See MR-13: Soil Stability and Sinkholes.
- 130-121 The commenter seems to be referring to the sinkhole reportedly caused by a broken irrigation line in a homeowner's lawn. See response to Comment 130-4, which addresses this sinkhole. See also MR-13: Soil Stability and Sinkholes.
- 130-122 A Quiet Zone reduces freight noise by eliminating routine freight horn noise. As described in Section 2.3-1.3 of the Draft EIR, a Quiet Zone could be established when substantial safety measures are installed to mitigate the increased risks associated with eliminating the use of train horns. These measures typically include vehicle and pedestrian gates, lights and bells, and Americans with Disabilities Act (ADA) compliant sidewalks and ramps. The project includes the installation of these safety features at the freight at-grade crossings as part of the project design. By incorporating these improvements, the project would enable the local jurisdictions to apply for and establish a Quiet Zone in accordance with federal requirements. In this way, the project supports the potential elimination of freight horn noise at these crossings. Additional project features and mitigation measures, such as MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs, would further reduce noise from freight and light rail operations. See MR-3: Operational Noise Project Features and Mitigation Measures.
- 130-123 Noise monitoring locations are shown in Figure 3.6-7 and Figure 3.6-8 of the Draft EIR. Metro conducted noise measurements at multiple locations, including locations 17 and 18 on Condon Avenue, south of Artesia Boulevard (which is representative of ambient noise-level conditions on Ruxton Avenue), and location 23, south of 182nd Street at Ralston Lane and Firmona Avenue (which is representative of conditions south of 182nd Street on Firmona Avenue, Fisk Lane, Fisk Court, and Spreckles Court). Regarding the Draft EIR's identification of the residence at 4549 186th Street in Table 3.6-11 (location 24), the address is correctly identified as Redondo Beach.
- 130-124 See response to Comment 130-23.
- 130-125 See responses to Comments 130-23 and 130-24.
- 130-126 Beginning on page 3.1-16, Section 3.1, Transportation, of the Draft EIR, indicates the significant number and routing of bus services and stops at the planned South Bay Galleria Station. Also see Figure 3.1-4 of the Draft EIR, which depicts the Hawthorne Option study area base year transit lines. Additionally, the 2023 Transportation Detail Report, published concurrently with the Draft EIR, includes an analysis of non-CEQA transportation effects, addresses probable transit rerouting that could occur under each of the project alignments. Nonetheless, it is not a commitment for Metro or its partner transit agencies to operate precisely those services, as discussed in the report.
- 130-127 The comment suggests clarifying the connectivity between the proposed South Bay Galleria Station and the Redondo Beach Transit Center. Although the Draft EIR does not characterize travel between these two locations as "rare," it does evaluate existing and planned transit service in the area, including the multiple bus routes that currently serve the South Bay

Galleria Station. As described in Section 3.1, Transportation, of the Draft EIR (beginning on page 3.1-16) and illustrated in Figure 3.1-4, the bus stops on Artesia Boulevard and Hawthorne Boulevard near the Galleria are relatively high ridership and transfer stops with regional and local connections, including routes that stop on Artesia Boulevard and connect to the Redondo Beach Transit Center. See the 2023 Ridership Summary Report, published concurrently with the Draft EIR, for more information on projected ridership for the project. From a CEQA standpoint, the relevant question is whether the project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (see CEQA Guidelines Appendix G, Section XVII, question 'a'). As analyzed in Sections 3.1-4.1.1 and 3.1-4.1.2 of the Draft EIR, the project would not interfere with existing bus service or prevent future service expansion. No changes to the Draft EIR are necessary in response to this comment, but the information provided is consistent with Metro's understanding that riders would continue to have convenient transit connections between the proposed stations and surrounding destinations, including the Redondo Beach Transit Center.

- 130-128 The conceptual design in the Draft EIR for the proposed station on Hawthorne Boulevard includes pedestrian access and safety elements, including proposed crosswalks to access the station.
- 130-129 The commenter appears to be clarifying that the Torrance Transit Center is already served by a City-operated shuttle to the Del Amo Fashion Center, and that additional connectivity could be made via several southbound bus routes. The Draft EIR notes that the project is intended to improve regional rail transit access, with connectivity to surrounding nearby destinations via many local bus routes, such as the Del Amo Fashion Center. All comments have been shared with the Metro Board for their consideration.
- 130-130 The comment is an excerpt from the Ninyo & Moore study that was referred to in Comment 130-117. See response to Comment 130-7, which discusses the applicability of the analysis of the Ninyo & Moore study to the analysis in the Draft EIR. Also see MR-13: Soil Stability and Sinkholes.
- 130-131 The City has included Comments 130-131 through 130-154 as part of its March 22, 2023 submittal on the Draft EIR. However, Comments 130-31 through 130-54 consist of remarks dated May 17, 2022, which predate the public review period of the Draft EIR (January 26 to March 27, 2023). The City's pre-Draft-EIR support for the Hawthorne Option is noted in the record. All comments have been shared with the Metro Board for their consideration.
- 130-132 The comment predates the public review period of the Draft EIR. See response to Comment 130-3 and MR-1: Selection of Alternatives.
- 130-133 The comment predates the public review period of the Draft EIR. See response to Comment 130-3 and MR-1: Selection of Alternatives.
- 130-134 The comment predates the public review period of the Draft EIR. Section 3.6, Noise and Vibration, of the Draft EIR, analyzes potential impacts related to noise and vibration and identifies mitigation measures to reduce impacts. See response to Comment 130-4, MR-1: Selection of Alternatives, MR-8: Light Rail and Freight Train Safety, and MR-9: Light Rail Security.
- 130-135 The comment predates the public review period of the Draft EIR. See response to Comment 130-4 and MR-13: Soil Stability and Sinkholes.

- 130-136 The comment predates the public review period of the Draft EIR. Based on conceptual design, Metro anticipates that the retaining wall at this location would be approximately 15 feet tall, which is consistent with the height of the existing freight track as measured from the ground level of the houses. The retaining wall is necessary to accommodate the grade changes and ensure the safe operation of the proposed light rail transit. Potential noise and vibration impacts from the light rail are analyzed in Section 3.6, Noise and Vibration, of the Draft EIR. Potential air quality impacts are evaluated in Section 3.4, Air Quality, of the Draft EIR. With respect to potential shading, the creation of shade on private property, such as reduced sunlight in private yards, is generally not considered a significant environmental impact unless it affects public spaces or public resources such as parks, open space, or solar access. In addition, because the position of the sun changes throughout the day and year, any shading from the project features would be temporary and vary in duration, rather than causing continuous loss of light. Furthermore, the scale of retaining walls and soundwalls would generally be similar to the surrounding environment, and would therefore not generally be a substantial introduction of shade. Accordingly, shading of individual residences would not constitute a significant impact.
- 130-137 The comment predates the public review period of the Draft EIR. The City's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. All potential impacts required for analysis under CEQA, including those to the residences along the Metro ROW, are evaluated in the Draft EIR.
- 130-138 The comment predates the public review period of the Draft EIR. Metro acknowledges the Hawthorne Option would have higher ridership than the Metro ROW alignments. Metro analyzed ridership benefits in relation to construction cost (see May 2024 Metro Board Report) and found that the Hawthorne Option was less cost effective than the LPA. See MR-1: Selection of Alternatives.
- 130-139 The comment predates the public review period of the Draft EIR. See response to Comment 130-3, as well as MR-1: Selection of Alternatives for information concerning the Metro Board's selection of the LPA.
- 130-140 The comment predates the public review period of the Draft EIR. The Draft EIR addresses concerns related to oil pipelines in Section 3.9, Hazards and Hazardous Materials, and Section 3.11, Utilities and Service Systems, of the Draft EIR. See MR-7: Utility Relocation and Hazardous Materials Safety.
- 130-141 The comment predates the public review period of the Draft EIR. See MR-21: Cost Estimates and Schedule.
- 130-142 The comment predates the public review period of the Draft EIR. The Draft EIR evaluates the potential for the project alignments to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR. See the analysis and conclusions contained therein. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.
- 130-143 The comment predates the public review period of the Draft EIR. Section 3.6, Noise and Vibration, of the Draft EIR, addresses noise and vibration due to construction and operation.
- 130-144 The comment predates the public review period of the Draft EIR. Metro values community engagement and appreciates the participation of local officials and residents in discussions

about the project. Feedback from community meetings is an essential part of the planning process and the feedback received during the 2022 community events for the project helped inform Metro's approach to project development, including design options, as well as the analysis in the Draft EIR. Metro has designed the tracks to minimize potential impacts to adjacent land uses. The re-alignment of the freight tracks within the Metro ROW is necessary to accommodate the light rail tracks. Mitigation measures are proposed in the Draft EIR where necessary to address potential impacts, including those related to noise and vibration during project construction and operation, as well as those related to air quality during construction. See MR-3: Operational Noise Project Features and Mitigation Measures, MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-8: Light Rail and Freight Track Safety.

- 130-145 The comment predates the public review period of the Draft EIR. See MR-5: Vibration Impact Types and Impact Thresholds, MR-6: Vibration Analysis During Final Design, MR-8: Light Rail and Freight Train Safety, and MR-13: Soil Stability and Sinkholes. The LPA would avoid shifting freight closer to the residential developments referenced in the comment.
- 130-146 The comment predates the public review period of the Draft EIR. Section 3.6-2.4, Noise and Vibration, of the Draft EIR presents the significance criteria used for the noise and vibration analysis. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-5: Vibration Impact Types and Impact Thresholds.
- 130-147 The comment predates the public review period of the Draft EIR. The Draft EIR establishes a range of mitigation measures to address potential noise impacts during both project construction and operation. As described in Section 3.6, Noise and Vibration, of the Draft EIR, Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs would reduce noise impacts associated with light rail operations, and MM-NOI-4: Quiet Zone Establishment (for the Metro ROW alignments) would address combined light rail and freight operational impacts. With implementation of the foregoing mitigation measures, only the Elevated/At-Grade Alignment with at-grade crossings would result in a significant and unavoidable operational noise impact. With implementation of these same mitigation measures, the LPA would result in a less-than significant operational impact. During construction, noise impacts would be minimized through the implementation of a Noise Control Plan as part of Mitigation Measure MM-NOI-1: Noise Control Plan, which includes the use of noise-reducing devices on construction equipment, noise barriers, and adherence to local noise ordinances.

Sound proofing homes to minimize construction noise has been carefully considered. However, this approach is not considered feasible or appropriate for the following reasons:

- > Construction noise is temporary and mobile: Construction would occur in phases along the project alignment over a multi-year period, and no single home would experience intense noise for the full construction duration. Rather, heavy construction activity would be localized to a given block or segment for limited durations, with quieter finishing work occurring thereafter. Retrofitting homes for such temporary, localized impacts is not a proportionate or effective mitigation strategy.
- > Retrofitting is not an effective approach for exterior noise: Construction and operational noise is measured and assessed using exterior noise criteria, and the

most effective mitigation is achieved by reducing noise at the source (e.g., through equipment selection, barriers, and site management). Soundproofing interior spaces, such as replacing windows or adding wall insulation, does not address outdoor noise levels and may not be effective unless doors, ventilation, and other openings are also sealed.

- > Interior ventilation could be impaired. For acoustic retrofitting to meaningfully reduce noise levels, windows would need to remain closed, which may conflict with ventilation and air quality needs protected under buildings and preferred by some residents. If windows remained open, the intended goal of reducing noise impacts to sensitive receptors would not be achieved as desired, reducing the effectiveness of the mitigation measure.
- > Retrofitting would require extensive coordination and participation: Implementing an acoustic retrofitting program would require sending formal offers to hundreds of property owners and tenants, negotiating liability and access terms, and coordinating multiple in-unit site visits for testing, construction, and post-construction verification. Many tenants would likely be unresponsive or unwilling to permit construction inside their homes, particularly given the disruptions and potential impacts to the buildings, such as interference with existing waterproofing.
- > Retrofit measures are logistically and financially infeasible on a broad scale: Installing replacement windows or conducting individualized building modifications would require property-by-property assessments of building construction type, existing window conditions, occupancy status, and owner consent. To be effective, each unit would need to be analyzed based on building age, construction type, orientation, and existing conditions. It would also require coordination with contractors, temporary relocation in some cases, and follow-up inspections. These efforts would be disproportionately burdensome relative to the temporary nature of the impact. Further, given the scale, complexity, and potential for low participation, such a program would be unlikely to be completed within a reasonable timeframe.
- > Retrofit measures may introduce secondary impacts: Construction work to install new windows or insulation, particularly if done on an expedited basis in an occupied home, could itself create disruptions, such as noise, dust, and temporary loss of access. In many cases, these impacts could exceed or compound the temporary construction noise the retrofit is intended to mitigate.

For these reasons, retrofitting of homes is not proposed as a feasible mitigation measure for construction (or operational) noise impacts. Such a measure would be of uncertain effectiveness for the reasons described above and therefore would not constitute appropriate mitigation under CEQA. Metro could not force tenants and homeowners to participate in such a program, further limiting the measure's ability to meaningfully reduce the impact it is intended to address. Instead, the project would implement proactive measures that reduce noise at the source, which are enforceable through the Noise Control Plan, and are applicable across the entire project corridor.

- 130-148 The comment predates the public review period of the Draft EIR. Section 3.6, Noise and Vibration, of the Draft EIR assesses freight operations at the proposed relocated freight track locations, in accordance with the FTA Transit Noise and Vibration Assessment Manual (2018). Changes in freight noise level would vary depending on the location of receptors. Sensitive receptors on the west side of the Metro ROW would experience marginally greater freight noise due to the shift in freight tracks closer to these receptors, while receptors on the east side of the Metro ROW may experience a slight decrease in freight noise. Overall, freight noise is anticipated to be reduced compared to existing conditions with implementation of Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.
- 130-149 The comment predates the public review period of the Draft EIR. See MR-8: Light Rail and Freight Train Safety.
- 130-150 The comment predates the public review period of the Draft EIR. Emergency access is addressed in Section 3.1, Transportation, of the Draft EIR, beginning on page 3.1-42 and includes average emergency response times, if available. Emergency response agencies, which have been notified of the project, are responsible for setting and maintaining their own standards for response times with respect to changing conditions, including, but not limited to, construction projects in the area. See MR-12: Emergency Access.
- 130-151 The comment predates the public review period of the Draft. As noted in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, as required by Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be performed to characterize the soil types and their suitability for the construction of the project. Based on these investigations, appropriate geotechnical design recommendations would be developed, including measures to ensure that the retaining wall structures are capable of supporting the weight of freight trains operating at grade adjacent to the below-grade alignment. These recommendations would include strategies to prevent soil subsidence, such as soil stabilization, retaining wall reinforcement, and other engineered solutions informed by field exploration, laboratory testing, and engineering analyses. See MR-13: Soil Stability and Sinkholes.
- 130-152 The comment predates the public review period of the Draft EIR. Regarding berms for the relocated freight lines, according to the Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, the centerline of the realigned freight tracks north of Artesia Boulevard would be more than 20 feet from the western boundary of the Metro ROW. Thus, berms for the realigned freight tracks would be farther than five feet of private properties.
- The design includes retaining walls as needed to stabilize berms and ensure proper drainage. These retaining walls would incorporate drainage systems to manage runoff and prevent water accumulation near private property. To address noise impacts, soundwalls would be installed where significant noise impacts have been identified per MM-NOI-2: Soundwalls, typically along both sides of the Metro ROW. These soundwalls are designed to reduce noise levels to meet FTA noise criteria for residential properties. Similarly, vibration mitigation measures include MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats to reduce operational vibration to below the FTA vibration

criteria. Together, these measures would ensure the project design minimizes noise and vibration, maintains stability, and accommodates proper drainage. See MR-3: Operational Noise Project Features and Mitigation Measures.

- 130-153 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. Chapter 2, Project Description, of the Draft EIR describes the multi-use recreational paths that would be included within each alignment option. A path would be included in Redondo Beach, between Grant Avenue and 182nd Street, which would connect to the Redondo Beach TC Station.
- 130-154 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-51 and MR-13: Soil Stability and Sinkholes.
- 130-155 The City has included Comments 130-155 through 130-167 as part of its March 22, 2023 submittal on the Draft EIR; however, Comments 130-55 through 130-67 consist of the City's March 16, 2021 letter providing input on the scope of the Draft EIR in response to Metro's Notice of Preparation of the Draft EIR. Appendix 1-A, Notice of Preparation/Scoping Summary, of the Draft EIR provides a summary of the scoping process, including the City of Redondo Beach's feedback.
- 130-156 The comment predates the public review period of the Draft EIR. As detailed in Chapter 2, Project Description, of the Draft EIR, the Hawthorne Option is fully elevated. Noise and vibration are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-8: Light Rail and Freight Train Safety.
- See response to Comment 130-155 and MR-1: Selection of Alternatives. All comments have been shared with the Metro Board for their consideration.
- 130-157 The comment predates the public review period of the Draft EIR. See response to Comment 130-155, as well as MR-1: Selection of Alternatives and MR-10: Changes to Community Character.
- 130-158 The comment predates the public review period of the Draft EIR. See response to Comment 130-155. The Trench Option evaluated in the Draft EIR consists of a trench alignment along the Metro ROW including under 182nd Street, as described in Chapter 2, Project Description, of the Draft EIR, specifically in Section 2.3-2. Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR includes an assessment of potential environmental impacts that would result from the Trench Option.
- 130-159 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-155, as well as MR-7: Utility Relocation and Hazardous Materials Safety.
- 130-160 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. Noise-level increases due to project construction and operation are evaluated in Section 3.6, Noise and Vibration, of the Draft EIR. See responses to Comments 130-155 and 130-15, as well as MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, MR-4: Potential Negative Health Effects Related to Noise, Vibration,

and Air Quality, MR-10: Changes to Community Character, and MR-14: Property Values and Impacts to Businesses.

- 130-161 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-155. Loss of parking is not considered an environmental impact under CEQA; nonetheless, the 2023 Transportation Detail Report, published concurrently with the Draft EIR, includes information on parking changes related to the project. Parking at the existing Redondo Beach (Marine) Station and Redondo Beach Transit Station would be maintained.
- 130-162 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. Section 3.15, Public Services, of the Draft EIR evaluates the potential for the project alignments to result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, and other performance objectives. See the analyses and conclusions therein. Also see response to Comment 130-155, as well as MR-9: Light Rail Security.
- 130-163 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comments 130-155, 130-3, and 130-136.
- 130-164 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. Section 3.1 of the Draft EIR evaluates transportation impacts to pedestrian and bicycle facilities and safety, including consideration for nearby schools, pedestrian facilities, and the need for safe crossings. As discussed therein, the project would improve safety at existing railroad crossings by incorporating advanced safety features that exceed the warning devices currently used for the freight rail line. See response to Comment 130-55 and MR-10: Changes to Community Character.
- 130-165 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-155. Public roads are maintained by the relevant city, the county, or the state (Caltrans) and are periodically rehabilitated to address wear and tear. Where construction activity would require the removal or alteration of portions of the roadway or other transportation facilities, Metro would restore the affected areas to their original or better condition, or to an improved configuration, as described in Section 2.3 of the Draft EIR.
- 130-166 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-155. As described in Section 3.3, Aesthetics, of the Draft EIR, in accordance with Project Feature PF-AES-2: Metro Design Standards, all project components would be designed in accordance with the Metro Rail Design Criteria and the objectives of the Metro Art Program Policy. Metro would continue to coordinate with the City of Redondo Beach with respect to public art planning and design in the next phase of design, pending project approval by the Metro Board.
- 130-167 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-155. Section 3.2, Land Use and Planning, of the Draft EIR reviews relevant land use planning documents. The City of Redondo Beach's General Plan and Zoning Ordinance are shown on pages 3.2-4 through 3.2-5, in Table 3.2-3 of the Draft EIR. The project's consistency with the City of Redondo Beach General Plan is described on page 3.2-27 of Table 3.2-5 of the Draft EIR.

- 130-168 The City has included Comments 130-168 through 130-175 as part of its March 22, 2023 submittal on the Draft EIR; however, Comments 130-168 through 130-175 consist of the City's July 18, 2018 letter on the Supplemental Alternatives Analysis. The comments predate the public review period of the Draft EIR (January 26 to March 27, 2023) and, thus, do not address the adequacy of the Draft EIR.
- Metro has considered the City's requests as part its preparation of the Draft EIR. The Hybrid Alternative has been selected as the LPA. See MR-1: Selection of Alternatives.
- 130-169 The comment predates the public review period of the Draft EIR. See response to Comment 130-168. The project would not be subject to the City's Planning Commission Design Review, but Metro would continue to coordinate with the City in future phases of design, including providing opportunities to review station design and access plans.
- 130-170 The comment predates the public review period of the Draft EIR. See response to Comment 130-168 and MR-11: Traffic Delay and Level-of-Service. With respect to parking, State law preempts Metro from compliance with local zoning ordinances (*see Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996), including Redondo Beach Municipal Code Section 10-2.1700 et seq. Additionally, CEQA does not require an evaluation of parking capacity and demand. The project would include a surface parking lot at the Torrance TC Station. The project would also include Project Feature PF-T-1: Construction Traffic Management Plan. The CTMPs prepared as part of Project Feature PF-T-1: Construction Traffic Management Plan would consist of several elements, including, but not be limited to, worksite traffic control plans to ensure safe access for pedestrians traveling around parking lanes temporarily closed as part of project construction that would have otherwise been used by said individuals. In addition, the CTMPs would require the construction truck contractor to provide off-site truck staging in a legal area, further preventing construction activities from affecting existing parking locations.
- 130-171 The comment predates the public review period of the Draft EIR See response to Comment 130-168. Metro would coordinate with the City prior to construction on a Construction Traffic Management Plan (CTMP). As described in Section 3.1, Transportation, of the Draft EIR, on pages 3.1-15 to 3.1-16 (describing Project Feature PF-T-1: Construction Traffic Management Plan), as part of the project, the contractor must develop a CTMP prior to the initiation of localized construction activities. The CTMP would be submitted to the City of Redondo Beach for review.
- 130-172 The comment predates the public review period of the Draft EIR. See response to Comment 130-168. The Metro ROW is zoned as P-ROW according to the City's zoning ordinance, specifically the category of "railroad". The criteria included in the comment are not applicable. See MR-10: Changes to Community Character for additional information regarding land use planning and consistency.
- 130-173 The comment predates the public review period of the Draft EIR. See response to Comment 130-168. In the event that Metro pursues the Hawthorne Option, some commercial properties would need to be permanently acquired. However, Metro is not subject to local zoning requirements; therefore, a rezoning entitlement would not be required. See MR-10: Changes to Community Character for more information. Additionally, the project would not be inconsistent in terms of land use, given the properties are industrial and located between

an existing railroad corridor and freeway corridor. Metro has selected the Hybrid Alternative as the LPA. See MR-1: Selection of Alternatives.

130-174 The comment predates the public review period of the Draft EIR See response to Comments 130-168 and 130-169, as well as MR-10: Changes to Community Character.

130-175 The comment predates the public review period of the Draft EIR. Although Metro is not subject to local zoning ordinances, pursuant to Mitigation Measure MM-NOI-1: Construction Noise Control Plan, Metro would obtain a variance from the applicable local jurisdiction when nighttime work is required. Section 4-24.604 of the City of Redondo Beach Noise Ordinance specifies that the provisions cited by the comment do not apply to any activity that is preempted by state or federal law. State law preempts Metro from compliance with the local zoning ordinance (see *Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996). Therefore, the standards cited by the comment do not apply. Also see responses to Comments 130-168 and 130-15, as well as MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

130-176 This comment duplicates Comment 130-168. See the response to that comment.

### **Submission 132 Sean Carlson, Metropolitan Water District of Southern California**

132-1 Metro acknowledges Metropolitan Water District of Southern California’s (Metropolitan) facilities located within and adjacent to the project limits. For reference, utilities are discussed in Section 3.11, Utilities and Service Systems, of the Draft EIR. The design of the project allows all utility owners to maintain access to their facilities. Metro owns most of the underlying railroad corridor, referred to as the Metro right-of-way (ROW), and Metropolitan’s facilities require a license to cross Metro-owned portions of the ROW. Any required adjustments to Metropolitan facilities would be subject to the terms and conditions of the current license agreement(s) between Metro and Metropolitan.

132-2 Metro acknowledges Metropolitan’s requirement to maintain access to its facilities at all times for maintenance and repairs. Metro would coordinate with Metropolitan throughout future phases of design and prior to construction to ensure the project activities do not conflict with their facilities or access needs. Regarding the West Basin Feeder 45” pipeline located along Manhattan Beach Boulevard, Metro has a license agreement with Metropolitan for an easement where the utility crosses underneath the Metro ROW. On May 23, 2024, the Metro Board selected the Hybrid Alternative as the LPA. The LPA was referred to as the “170th/182nd Grade-Separated Light Rail Transit Alternative” in the Draft EIR. Under the LPA, the light rail track would be on an elevated structure to cross over Manhattan Beach Boulevard. As part of the design refinements reflected in the updated ACE drawings in the Final EIR, Metro has shifted the location of proposed support columns for the elevated light rail structure to avoid placing it within the public roadway. See Figure 4.20-6 in Section 4.21, Corrections and Additions, of the Final EIR, which shows that a support column would not be installed within the Manhattan Beach Boulevard boundaries, and Section 4.25, Corrections and Additions, of the Final EIR, which provides an evaluation of environmental impacts as a result of the LPA design refinements, including the shifted support columns. Also see Appendix B, Select Advanced Conceptual Engineering Drawings - LPA, of the Final EIR. Therefore, the project would not add additional train loads over utilities or require the underground facility to be relocated. Freight trains currently operate over the pipeline at this location. The project would shift the freight tracks slightly to the

- west, and the Metropolitan pipeline would be protected-in-place with a casing to ensure that vehicle and train loading would not damage the utility. Vibration-related impacts to underground utilities are not reasonably anticipated. For additional information, see MR-7: Utility Relocation and Hazardous Material Safety.
- 132-3 Metro acknowledges Metropolitan’s offer to provide detailed drawings of its pipelines and right-of-way and would coordinate with the Substructure Team to obtain this information as needed. The current design is based on plan and profile drawings that Metro received from Metropolitan in a letter dated March 17, 2020. Metro would ensure that Metropolitan’s facilities are fully shown and identified on all design plans submitted for review. As the project advances into the next design phase (pending project approval by the Metro Board), Metro would share the designs with Metropolitan for review and comment to ensure compatibility with Metropolitan’s facilities and easements.
- 132-4 See response to comment 132-2. The Metropolitan pipeline is located within an easement in the Metro ROW, and Metropolitan’s operating rights are governed by a license agreement rather than property rights. No studies or construction, including potholing, are proposed in any Metropolitan property. Metro does not consider Metropolitan a CEQA responsible agency, but would continue to coordinate with Metropolitan as the design progresses.
- 132-5 Metro actively monitors water use and finding ways to increase conservation efforts. Potable water use has been reduced across the agency by over 34% since 2013 through conservation efforts, system enhancements and efficiency upgrades aligned with Metro’s 2010 Water Action Plan. While water conservation and efficiency remain priorities for Metro, water reclamation, reuse and sustainable stormwater management are equally critical components of Metro's water strategy through 2030. Metro targets and commitments related to water reflect the full water cycle, recognizing that the ways in which the agency procures, consumes, processes and disposes of water have regional impacts that could affect both the supply and quality of regional water resources. The Metro Moving Beyond Sustainability – Strategic Plan 2020 outlines a framework of goals, targets, strategies, and actions to organize the measures, programs, and projects related to sustainability. The Plan is organized into topical strategic focus areas, including water quality and conservation. Goals include reducing agency-wide potable water use by 22% from 2018 to 2030. Metro has policies in place to meet this goal by increasing the use of recycled water, planting native and drought-tolerant trees, using weather sensing irrigation controllers, and low-flow sanitary fixtures. Metro is committed to working with regional partners, like Metropolitan, to maximize stormwater capture and recycled water use opportunities.
- 132-6 The utility information included in the conceptual plans is not intended for final design-level mapping, but rather provides information on the location and general configuration of utilities within the Metro ROW for the purposes of environmental analysis. Although utility easement information was not included with the conceptual drawings, Metro is aware of the easement area, and has records of the license agreement. Metro would continue to identify Metropolitan facilities on relevant drawings as the project advances to the next design phase, which would occur if the Metro Board certifies the Final EIR and approves an alignment for advancement. As specified in project feature Construction Traffic Management Plan PF-US-1: Utility Identification and Coordination, discussed in Section 3.11, Utilities and Services Systems, of the Draft EIR, Metro would coordinate with

- Metropolitan and other utility owners throughout the design process to ensure that utilities are properly identified and protected in place to the extent feasible. For additional information, see MR-7: Utility Relocation and Hazardous Materials Safety.
- 132-7 As specified by Project Feature PF-US-1: Utility Identification and Coordination, Metro will use conversions that are based on information obtained during field survey and utility verification activities to be completed during the next phase of design.
- 132-8 Metro acknowledges Metropolitan’s comment regarding the potential need to relocate its existing pipeline at Manhattan Beach Boulevard under the Trench Option and the need for further evaluation of design criteria to determine the final length, depth, and size of any required adjustments. Metro also acknowledges Metropolitan’s note that modifications to its air release and vacuum structures may be necessary if the proposed alignment results in a new high or low point. The LPA would not require the West Basin Feeder pipeline to be relocated. Instead, the pipeline would be protected in place. However, a final decision on the alignment has not been made, and the Trench Option remains under consideration. Should further engineering determination that relocation or modifications to Metropolitan’s facilities are necessary under any alignment, Metro would coordinate closely with Metropolitan to assess design solutions and minimize potential conflicts. Utility plans for both relocation and protection in place would be further developed during the next stages of design.
- 132-9 See response to comment 132-8 regarding relocation of the West Basin Feeder pipeline. Metro is coordinating with Metropolitan on a Cooperative Agreement to address engineering review requirements and financial responsibilities, including cost-sharing arrangements for any necessary utility modifications, pending project approval by the Metro Board.
- 132-10 Metro would take these schedule constraints into consideration during the development of the next phase of design and would coordinate with Metropolitan regarding scheduling and other considerations that could affect Metropolitan’s seasonal requirements.
- 132-11 Metro would work with Metropolitan during the next design phase and would provide necessary technical information for Metropolitan’s review as the designs are developed.
- 132-12 Site specific geotechnical exploration would be completed as part of the next design phase following Metro Board certification of the Final EIR and approval of an alignment for advancement. Metro would share relevant geotechnical information with Metropolitan once it becomes available to support Metropolitan’s evaluation of potential conflicts with their facilities. The cast-in-drilled-hole (CIDH) pile that Metropolitan refers to was developed as part of the conceptual design for the Draft EIR. In response to Metropolitan’s concerns and to minimize impacts to utilities within Manhattan Beach Boulevard, Metro has refined the design so that this column would not be required within the roadway for the elevated structure for the Elevated/At-Grade Alignment (analyzed as the Proposed Project in the Draft EIR) or the LPA. A final decision on the alignment has not been made, and should further engineering determination that relocation or modifications to Metropolitan’s facilities are necessary under any alignment, Metro would coordinate closely with Metropolitan to assess design solutions and minimize potential conflicts. Utility plans for both relocation and protection in place would be further developed during the next stages of design.

- 132-13 See response to comment 132-12. More detailed cross-sections would be developed as part of the next design phase and would be shared with Metropolitan once available.
- 132-14 See response to comment 132-12. Groundwater is discussed in Section 3.10, Hydrology and Water Quality of the Draft EIR. As discussed in Section 3.10-3.5, groundwater depth at the northern end of the project has previously been measured at approximately 24 feet below ground surface (bgs). Sections 3.10-4.1 and 3.10-4.2 state that construction of foundations and columns may require groundwater dewatering during excavation activities. Site specific geotechnical exploration would be conducted as part of the next design phase to identify water table elevations and assess current groundwater conditions. However, groundwater drawdown is not anticipated for CIDH piles as a “wet” construction method is recommended for CIDH pile installations. In this method, the excavation is filled with slurry (or sometimes water) to maintain pressure and prevent collapse or inflow of groundwater during drilling. This approach stabilizes the hole without the need to lower the surrounding groundwater level, thereby minimizing the risk of drawdown-related settlement or impacts to adjacent structures.
- 132-15 See responses to Comments 132-12 and 132-14 with regards to CIDH pile installation and soils.
- 132-16 As stated in response to comment 132-2, under the LPA, the light rail track would be on an elevated structure to cross over Manhattan Beach Boulevard, and therefore, the project would not add additional train loads over utilities or require the facility to be relocated. Freight trains currently operate over the pipeline at this location. The project would shift the freight tracks slightly to the west, and the Metropolitan pipeline would be protected-in-place with a casing to ensure that vehicle and train loading would not damage the utility.
- 132-17 See MR-7: Utility Relocation and Hazardous Materials Safety. Metro acknowledges the importance of protecting existing pipeline infrastructure during construction. As noted in the comment, CIDH piles are proposed to be placed within the Metro ROW outside of Manhattan Beach Boulevard. However, driven piles would not be within 20 feet of the centerline of the pipeline, consistent with the restrictions identified in the comment. During the next phase of design, detailed structural calculations for pile foundations located near the pipeline would be prepared and submitted for review by affected utility owners, as part of Metro’s standard coordination protocols. Per Project Feature PF-US-1: Utility Identification and Coordination (see Section 3.11, Utilities, of the Draft EIR), Metro would coordinate directly with utility providers to conduct field verifications, such as potholing, in consultation with the affected utility, to confirm the location and depth of the pipeline prior to construction. Additionally, a settlement and lateral deformation analysis would be conducted for pile installations within proximity to critical utilities, including within the 50-foot range specified in the comment. The evaluations would inform the final design and construction methods to ensure pipeline integrity. As part of standard construction practices, settlement and deformation monitoring would occur, including ground settlement (or heaving) monitoring adjacent to trench walls, fill embankments and any settlement-sensitive utilities or structures. This measure would ensure the protection of nearby pipelines and compliance with the requirements of utility owners.
- 132-18 See response to comment 132-17 regarding settlement and how Metro would work to prevent it.

- 132-19 See MR-7: Utility Relocation and Hazardous Materials Safety. Per Project Feature PF-US-1: Utility Identification and Coordination (see Section 3.11, Utilities, of the Draft EIR), Metro would coordinate with utility owners, including Metropolitan, to identify and protect critical infrastructure during design and construction. Field verifications, such as potholing in consultation with the utility owner, would be conducted near foundations for project structures, in order confirm the location and depth of Metropolitan’s facilities prior to any excavation. As project design progresses into Preliminary Engineering and construction documentation, Metro would coordinate with Metropolitan to review project elements that may affect its facilities, and Metro would share shoring design information with Metropolitan once the construction documents have been developed. Driven piles are not anticipated to be placed within 20 feet of the centerline of Metropolitan’s pipeline. As design advances, Metro would continue to coordinate closely with Metropolitan to ensure that appropriate clearance and protection measures are incorporated, and that excavation does not proceed near sensitive facilities without appropriate review and acceptance.
- 132-20 Metropolitan’s facilities are identified in Appendix 2-A, Select Advanced Conceptual Engineering Drawings of the Draft EIR. As noted in response to comment 132-2, the project design has been refined to avoid direct conflict with the Metropolitan pipeline at Manhattan Beach Boulevard. Metro is committed to ongoing coordination with Metropolitan to ensure that its facilities are protected during construction. Metro would share construction equipment information with Metropolitan once construction documents have been developed. All construction activities near Metropolitan’s facilities would be conducted in a manner that prevents excessive vehicle, impact, or vibratory loads, and prevent the imposition of unbalanced loads on the pipeline. Metro would work with Metropolitan to address any project-specific concerns and would implement appropriate protective measures consistent with industry standards and Metropolitan requirements. See MR-7: Utility Relocation and Hazardous Materials Safety.
- 132-21 Metro does not foresee the need to store equipment and spoils over the Metropolitan facilities, but should the need arise Metro would coordinate with Metropolitan to avoid any conflicts with facilities. Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR includes preliminary staging areas for construction.
- 132-22 Metro would comply with Metropolitan requirements when constructing the project, including complying with vehicle load requirements over the pipeline.
- 132-23 Metro would comply with Metropolitan requirements when constructing the project, including not operating vibratory compaction equipment within the required minimum distance from pipelines.
- 132-24 Metro would contact Metropolitan and request staff contacts once the construction documents have been finalized, including with respect to potholing.
- 132-25 Metro acknowledges receipt of the returned prints of the drawings. If the Metro Board certifies the Final EIR and approves an alignment for implementation, designs would be developed as part of the phase of work. During that time, Metro would re-review Metropolitan’s comments and incorporate necessary revisions where appropriate. Metro would continue to coordinate with Metropolitan to address any design concerns and ensure Metropolitan’s feedback is considered in the development of project plans.

**Submission 138 Brenda Moun, City of Torrance Traffic Commission**

- 138-1 The City of Torrance Traffic Commission’s support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.
- 138-2 See MR-11: Traffic Delay and Level-of-Service. See the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for discussion on traffic conditions.
- 138-3 See response to Comment 138-1.
- 138-4 See response to Comment 138-1.
- 138-5 This comment duplicates Comment 138-2. See the response to that comment.
- 138-6 This comment duplicates Comment 138-1. See the response to that comment.

**Submission 356 Mayor William Brand, City of Redondo Beach**

- 356-1 Submission 356 includes the same comments from the City of Redondo Beach as Submission 130. See the responses to comments to Submission 130.

**Submission 358 Sean Carlson, Metropolitan Water District of Southern California**

- 358-1 Submission 358 includes the same comments from Metropolitan as Submission 132. See the responses to comments to Submission 132.

**Submission 393 Sean Carlson, Metropolitan Water District of Southern California**

- 393-1 Submission 393 includes the same comments from Metropolitan as Submission 132. See the responses to comments to Submission 132.

**Submission 424 Erinn Wilson-Olgin, California Department of Fish and Wildlife**

- 424-1 Submission 424 includes the same comments from CDFW as Submission 123. See the responses to comments to Submission 123.

**Submission 675 Daren Gilbert, California Public Utilities Commission**

- 675-1 Metro acknowledges the project is subject to the listed rules and regulations.
- 675-2 Metro acknowledges the design of the project must comply with applicable Commission General Orders. Compliance with the General Orders has been considered throughout the project’s conceptual design and would continue to be considered as the design advances. Pending project approval by the Metro Board, Metro would continue to coordinate with the California Public Utilities Commission (CPUC) during the next phases of engineering and design to ensure compliance and obtain any necessary exceptions or approvals for light rail-specific conditions.

- 675-3 Metro acknowledges the project must comply with federal safety regulations, including 49 C.F.R. Part 674, State Safety Oversight. Metro would maintain close coordination with the CPUC, the designated State Safety Oversight agency, to meet all oversight requirements.
- 675-4 The Draft EIR, beginning on page 3.1-48, examines the potential for increased hazards, including for pedestrians at the 170th Street and 182nd Street at-grade light rail crossings for the proposed Metro ROW Elevated/At-Grade Alignment. The analysis specifically considers the increased frequency of train (light rail) activity and potential hazards to pedestrians in these areas. The project includes several project features to address hazards at the 170th Street and 182nd Street at-grade crossings, which currently accommodate a single freight track. These upgrades would substantially improve railroad safety for pedestrians and vehicles by incorporating state-of-the-art safety devices, including gates designed to prevent pedestrian and vehicle access during train activity and flashing lights and audible warning devices for clear and timely notification of approaching trains. The Draft EIR accordingly concluded that impacts to pedestrian safety would be less than significant without mitigation. On May 23, 2024, the Metro Board selected the Hybrid Alternative as the LPA. The LPA was referred to as the “170th/182nd Grade-Separated Light Rail Transit Alternative” in the Draft EIR and grade separates light rail at 170th and 182nd Street. The CPUC’s support for the Trench Option and the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-8: Light Rail and Freight Train Safety.
- The light rail guideway of the LPA, Trench Option, and Hawthorne Option would be fully grade-separated from all roadways. See MR-1: Selection of Alternatives.
- 675-5 Metro acknowledges the comment regarding the proposed Gate-Down-Bell-Stop Variance (Project Feature PF-NV-3: Gate-Down-Bell-Stop Variance) and appreciates the input on this project feature. The following points provide clarification.
- As indicated in Section 3.6-21 of the Draft EIR, Project Features PF-NV-2: Crossing Signal Bell Shrouds and PV-NV-3: Gate-Down-Bell-Stop Variance are project features subject to agency approval, not mitigation measures. The Draft EIR does not assume implementation of Project Features PF-NV-2: Crossing Signal Bell Shrouds and PF-NV-3: Gate-Down-Bell-Stop Variance as a certainty. For full disclosure, predicted noise impacts without implementation of Project Features PF-NV-2: Crossing Signal Bell Shrouds and PF-NV-3: Gate-Down-Bell-Stop Variance are included in Table 4 in Appendix 3.6-B (Noise Analysis Detail Appendix) of the Draft EIR and summarized on pages 3.6-102 to 3.6-103 of the Draft EIR. As discussed on pages 3.6-102 to 3.6-103 of the Draft EIR, should the CPUC not authorize the bell shroud and gate-down-bell-stop project features, noise levels at 92 clusters would exceed the FTA noise criteria.
- The LPA does not require at-grade light rail crossings. Therefore, a gate-down-bell-stop variance would not be required for light rail operations under this alternative. The Quiet Zone establishment would eliminate the freight horn noise and would not be applicable to the light rail transit. Audible warnings related to freight crossing signal bells would still ring if and when the Quiet Zone is established as noted on page 3.6-21 of the Draft EIR under Project Feature PF-NV-1: Quiet Zone Equipment Installation.
- 675-6 Metro values the CPUC’s input and would continue to coordinate with the CPUC for all relevant regulatory oversight and to ensure that the final design and operation of the project meet all applicable safety requirements.

- 675-7 While CEQA does not require evaluation of environmental justice (EJ), the Draft EIR evaluates the project's potential environmental impacts, including air quality, water quality, energy, and access to transit. The project would improve access to public transit and air quality and reduce GHG emissions. Metro has conducted robust public outreach efforts throughout the planning process, including expanded access for participants with limited English proficiency (LEP) and with EJ communities. Metro remains committed to advancing environmental and social justice objectives through agency-wide policies and programs, including its Equity Platform its Moving Beyond Sustainability plan. See Appendix 1-A, Notice of Preparation/ Scoping Summary, of the Draft EIR and Appendix A, Public Engagement Report, of the Final EIR for more information.

### **Submission 1990 Kim Turner, City of Torrance**

- 1990-1 Metro appreciates the summary of the City's engagement regarding survey responses and support for different options. These responses are noted. All comments have been shared with the Metro Board for their consideration.
- 1990-2 See MR-9: Light Rail Security and MR-18: Homelessness.
- 1990-3 The City of Torrance Transit Department's concern is noted. All comments have been shared with the Metro Board for their consideration. See MR-21: Cost Estimates and Schedule.
- 1990-4 The Draft EIR includes a discussion of the Hawthorne Option for each environmental resources required to be assessed by CEQA. See MR-1: Selection of Alternatives and MR-17: Response to Torrance Community Letter.
- 1990-5 Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR describes the timeline for the LPA, which is approximately six years, a year longer than the Elevated/At-Grade Alignment that was described for the project in the Draft EIR. The project schedule would continue to be updated as refinements to the design, project cost estimates, and funding plan are advanced. See MR-21: Cost Estimates and Schedule for additional information.
- 1990-6 While Metro assists in identifying potential First/Last Mile (FLM) improvements during the planning and design phases, the implementation of FLM elements, such as crosswalks, bike lanes, landscaping, and pedestrian safety enhancements, falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in FLM planning. With respect to improving connectivity between buses and rail, Metro is committed to such outcomes. As analyzed in Sections 3.1-4.1.1 and 3.1-4.1.2 of the Draft EIR, the project would not interfere with existing bus service or prevent future service expansion. Furthermore, through construction of the proposed Redondo Beach TC Station (as part of the Elevated/At-Grade Alignment, Trench Option, or LPA) or South Bay Galleria Station (as part of the Hawthorne Option), bus riders would have improved access to convenient transit connections between the proposed stations and surrounding destinations.