5.4 RESPONSES TO GROUPS AND ORGANIZATIONS

Submission 8 Teri Shinde, Torrance Logistics Company LLC

8-1 The Draft EIR comprehensively addresses the potentially significant environmental impacts of the project. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. Also see MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety. Section 3.1, Transportation, of the Draft EIR evaluates hazards related to geometric design and emergency access. As concluded in the Draft EIR, impacts associated with such hazards would be less than significant.

To address the specific comments raised by both Torrance Logistics Company (TLC) and Torrance Refining Company (TORC), Metro has refined the project footprint to minimize the area of property affected by the proposed BNSF access road. In the Draft EIR, the access road alignment extended into the TORC property. In the Final EIR, the access road has been shifted to the west such that it remains entirely outside TORC's property, and within the existing Metro ROW, except where it connects to the existing BNSF access road parallel to Del Amo Boulevard. This adjustment minimizes the encroachment, preserves access for logistics and contractor activities, and maintains TORC's security perimeter. This refinement also helps reduce construction-related nuisances by moving construction activities farther from critical refining operations and eliminates the need to relocate the TLC pipeline in this area.

This minor adjustment does not result in new or substantially more severe significant environmental impacts not already disclosed in the Draft EIR. See Chapter 3, Design Refinements, and Appendix B, Select Advanced Conceptual Engineering Drawings for the Hybrid/Locally Preferred Alternative, of the Final EIR for more details on the revised access road. Metro has been coordinating and would continue to coordinate with TLC through future phases of the project.

8-2 See response to Comment 8-1. The Draft EIR considers the implications of the project's proximity to the refinery, particularly with respect to hazards, emergency access, and utility coordination, to the extent such issues fall within the scope of CEQA. For example, Section 3.9, Hazards and Hazardous Materials, evaluates the potential for the project to create or exacerbate hazardous conditions in the project area, including in proximity to existing oil and gas pipelines and industrial uses, such as the refinery, which is identified as a recognized environmental condition (see Map ID No. 19 in Table 3.9-1, Sites of Concern (RECs), of the Draft EIR).

As noted in response to Comment 8-1, Metro has refined the design of the project to reduce encroachment onto the refinery's property and to maintain access and security perimeters

(see Chapter 3, Design Refinements, and Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of the Final EIR).

Additionally, alternatives to the project are analyzed in Chapter 4, Evaluation of Alternatives, in the Draft EIR, including the CEQA-mandated No Project Alternative, a High-Frequency Bus Alternative, and the LPA (referred to in the Draft EIR as the 170th/182nd Grade-Separated Light Rail Transit Alternative). Consistent with CEQA Guidelines Section 15126.6(d), each alternative was evaluated in sufficient detail to allow meaningful evaluation, analysis, and comparison with the Elevated/At-Grade Alignment (including the route options).

8-3 The Draft EIR was prepared in accordance with CEQA to ensure a thorough environmental analysis, and public input has been an integral part of the process. Metro initiated coordination with TORC and TLC in 2022, prior to the release of the Draft EIR. Since the publication of the Draft EIR, Metro has met with TLC and TORC multiple times to discuss the project. Metro has been coordinating and would continue to coordinate with TLC and TORC throughout future phases of project design and construction to minimize disruptions to operations. Proposed pipeline relocations are limited to those that are necessary for project construction.

Construction impacts resulting from pipeline and utility relocations have been analyzed in the Draft EIR, as they have been included within the assumptions regarding construction equipment and duration of construction. The Hybrid Alternative was selected as the LPA in May 2024, but the Metro Board has not yet made final decisions regarding the project. For additional information regarding selection of the LPA and the next steps in the review and approval process, see MR-1: Selection of Alternatives.

8-4 See responses to Comments 8-1 and 8-3.

Metro initiated coordination with TORC and TLC in 2022, prior to the release of the Draft EIR, and Metro continues to coordinate with both parties. As described in response to Comment 8-1, the project has been refined to avoid the portion of the TLC pipeline located within the TORC property. While the Final EIR analyzes the environmental impacts associated with construction and operation of the proposed access road, some engineering details would be finalized during the Preliminary Engineering and Final Design phases, including the final utility protection measures, construction engineering methods, and safety coordination protocols. Design and engineering would be conducted by qualified professionals with experience designing and constructing infrastructure adjacent to active refining and pipeline facilities or equivalent. Metro would continue to closely coordinate with TORC and TLC regarding site-specific operational needs, utility protection measures, and compliance with all applicable health, safety, and environmental regulations.

8-5 As noted by the commenter, Metro initially identified five locations along the Metro ROW where relocation of the jet fuel pipeline could be required to accommodate the project. Since the Draft EIR's publication, Metro has continued to refine the project in consultation with TLC. As a result of these refinements, the potential relocation locations have been reduced from five to four. As described in Section 3.11, Utilities and Service Systems, of the Draft EIR, pipeline relocations would be conducted in compliance with industry safety

standards and in close coordination with the affected utility owner. Where feasible, utilities would be protected in place to avoid relocation. Metro would continue to work closely with TLC throughout future phases of design to further minimize potential disruptions to their pipeline and to explore additional opportunities to reduce the extent of required relocations. During construction, Metro would work with TLC to schedule construction activities that minimize operational downtime and disruption to pipeline service to the greatest extent possible.

Potential construction impacts, including those associated with pipeline and utility relocations, have been analyzed in the Draft EIR. These impacts were incorporated into the assumptions regarding construction activities, including equipment use and duration. For a description of the construction assumptions utilized in the Draft EIR, see Appendix 2-B, Construction Methods Memorandum. For additional information regarding utility relocations, see MR-7: Utility Relocation and Hazardous Materials Safety.

8-6 See MR-1: Selection of Alternatives. In May 2024, the Metro Board directed the staff to prepare the Final EIR, fully respond to all public comments on the Draft EIR, and refine costs and funding for the LPA. With respect to piecemealing, Metro did not defer the analysis of reasonably foreseeable and potentially significant impacts associated with the project to a later date. Rather, the Draft EIR evaluates and identifies the potentially significant impacts that could occur as a result of all components of the project, including those identified by TLC. Additionally, this Final EIR provides supporting details and clarifications that reinforce and amplify the Draft EIR's analyses and conclusions. For the potentially significant impacts, the Draft EIR includes mitigation measures to reduce potential impacts to less than significant to the extent feasible. If an impact cannot feasibly be mitigated to a less than significant level, the impact is identified as significant and unavoidable.

Since the publication of the Draft EIR, Metro has refined the project design as discussed above. Following the release of the Final EIR, the Metro Board, as the decision-making body of the Lead Agency, will consider whether to certify the Final EIR and approve the project, taking into account all public comments and feedback received from public engagement.

Submission 45 Tony Dolim, South Bay Estates

45-1 The commenter's opposition to the alignments along the Metro ROW is noted. All comments have been shared with the Metro Board for its consideration. See MR-1: Selection of Alternatives. Also see responses to Comments 45-2 through 45-6.

45-2 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. Metro is also committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. The LPA, selected by the Metro Board in May 2024, the Trench Option, and the Hawthorne Option would fully grade separate light rail from all roadways, thereby avoiding potential light rail train conflicts with pedestrians or cyclists. Existing freight crossings would be upgraded with safety

enhancements to be quiet zone ready. See MR-8: Light Rail and Freight Train Safety; MR-9: Light Rail Security; and MR-10: Changes to Community Character.

45-3 The potential for vibration impacts for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The noise and vibration analyses were performed in accordance with the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA, 2018), which is the industry standard for evaluating noise and vibration impacts from transit projects. This guidance provides a well-established and widely accepted framework for determining the potential effects of noise and vibration on sensitive receptors, including residential properties

Regarding operational noise impacts, the South Bay Estates were assessed in the analysis as Clusters G27 through G30. Because noise impacts are assessed based on exterior noise levels, a building's insulation has no bearing on the analysis. As shown in Figure 3.6-23, a soundwall is proposed along the eastern boundary of the Metro ROW, as required by Mitigation Measure MM-NOI-2: Soundwalls. The soundwall locations are also detailed in Table 3.6-26. With the implementation of the mitigation measures identified in the Draft EIR, operational noise impacts for Clusters G27 through G30 would be reduced to less than significant levels, as shown in Draft EIR Appendix 3.6-B, Table 4, pages 30-31 (showing mitigated light rail noise impacts), and Table 5, pages 38–39 (showing mitigated light rail plus freight relocation impacts). Additional details on proposed noise mitigation measures are available in Major Topic Response MR-3: Operational Noise Project Features and Mitigation Measures.

Similarly, with implementation of the mitigation measures identified in the Draft EIR, operational vibration annoyance impacts would be reduced to less than significant at all receptors under each alignment option and alternative. This would be accomplished through operational vibration impacts, implementation of Mitigation Measure MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats, as described in Sections 3.6-5 and 3.6-6.2.2 of the Draft EIR. As discussed on page 3.6-92 of the Draft EIR, operational vibration impacts are associated with annoyance, not damage; therefore, damage-related operational vibration impacts are not anticipated. MM-VIB-2: Construction Equipment Location and MM-VIB-3: Pre- and Post-Construction Surveys would reduce vibration damage and annoyance impacts to less than significant levels for all alignments studied in the Draft EIR.

Regarding concerns specific to mobile homes, the operational vibration analysis was performed on a dwelling unit basis, which ensured that all dwelling units within the calculated impact distance, including individual mobile homes, were assessed individually. The results of this analysis are shown in the vibration impact maps in Appendix 3.6-C of the Draft EIR. It is important to note that the suggestion that modular homes are more susceptible to damage from vibration is not supported by the FTA's guidance or other empirical evidence. Modular homes are generally more flexible than traditional homes built on concrete slabs with rigid features such as brick fireplaces and plaster walls, making modular homes less likely to sustain damage from vibration. Additionally, no empirical evidence supports the claim that train-induced vibration causes damage to electrical lines,

or other buried utilities. Regarding potential for structural impacts during operations, see MR-5: Vibration Impact Types and Impact Thresholds. The project incorporates design features and mitigation measures to ensure that vibration levels caused by operation of the project remain within the acceptable levels established by the FTA for damage-related and annoyance-related vibration impacts. Noise: As for construction noise impacts, as indicated by the comment, the Draft EIR discloses that each alignment option would result in potentially significant construction-related noise impacts. To address these impacts, the project would implement MM-NOI-1: Noise Control Plan. While implementation of this measure would reduce the construction noise impacts to the maximum extent feasible, some noise and impacts during construction would remain significant and unavoidable, as discussed in Section 3.6-6 of the Draft EIR.

Vibration: For construction vibration impacts, the Draft EIR identifies temporary vibration impacts that could occur from certain activities, including pile driving, heavy equipment operation, and other high-impact construction methods. Both vibration damage and vibration annoyance impacts are assessed. To address vibration-related *damage* impacts, Mitigation Measures MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post-Construction surveys, would be required. With implementation of these mitigation measures, potential vibration *damage* impacts of the LPA, the Trench Option, and the Hawthorne Option, would be less than significant. However, the Elevated/At-Grade Alignment would result in a significant and unavoidable vibration *damage* impact, even with implementation of mitigation.

The construction vibration *annoyance* impacts of the Metro ROW alignments and the Hawthorne Option would be significant and unavoidable. These would be temporary and linked to the use of the most vibration intensive types of equipment (e.g., pile drivers and vibratory compactors), which may only be in use for a short period near any given property. Implementation of MM-VIB-1: Vibration Control Plan, would reduce these impacts, though not necessarily to a less than significant level at all times and locations during construction. Therefore, the construction vibration-related *annoyance* impacts are considered significant and unavoidable for each light rail alignment and alternative.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety; and MR-13: Soil Stability and Sinkholes. Regarding underground utilities, Metro would conduct pre-construction surveys and site-specific geotechnical investigations as required by Project Feature PF-HWQ-4: Trench Operation Runoff Collection and Treatment, ensuring that all utilities, including gas, electricity, water, and sewer lines, are properly identified, protected, and relocated if necessary to avoid disruption to residents. Post-construction, Metro would restore affected

infrastructure to meet or exceed its pre-construction condition. See MR-7: Utility Relocation and Hazardous Materials Safety.

45-4 See response to Comment 45-2 and MR-18: Homelessness. The project includes numerous safety features specifically designed to prevent unauthorized access to the tracks and reduce safety risks for nearby communities. As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed by physical barriers, such as fencing, soundwalls, or a combination of both, to prevent unauthorized access. These barriers would help deter entry onto the tracks, including by children, and significantly reduce the potential for accidents or injuries. In addition to physical barriers, the project would include lighting, security cameras, and regular patrols consistent with Crime Prevention through Environmental Design (CPTED) principles and Metro's systemwide safety and security practices. These features are intended to promote safety, discourage loitering, and address concerns about crime or unauthorized access, particularly in areas that may currently lack adequate lighting or visibility. CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore, the Draft EIR does not make any conclusions regarding this topic. However, for informational purposes, see MR-9: Light Rail Security. See also MR-8: Light Rail and Freight Train Safety.

45-5 The commenter's preference for the Hawthorne Option over the Metro ROW alignments is noted. All comments have been shared with the Metro Board for its consideration. The stated preference relates to the perception that the Hawthorne Option would better link riders with businesses, in addition to the Hawthorne Option resulting in fewer CEQA impacts than the Metro ROW alignments. The comment further states that the Draft EIR is deficient in concluding that all three of the proposed alignment options would be equivalent in their impacts to noise, light pollution, and carbon emissions without providing substantive consideration of the anticipated specific impacts of each option. Although the CEQA significance determinations may be similar across the alignment options, that does not indicate the types or magnitude of impacts would be equivalent. The Draft EIR presents separate analyses for each option for each environmental resource topic, supported by substantial evidence; see Section 3.3, Aesthetics; Section 3.5, Greenhouse Gas Emissions; and Section 3.6, Noise and Vibration, of the Draft EIR. These sections, along with Chapter 4, Evaluation of Alternatives, of the Draft EIR, clearly detail differences between the alignment options. For example, Table 3.5-16 on page 3.5-29 compares operational GHG emissions between the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option. GHG emissions associated with the LPA are discussed on page 4-42 of the Draft EIR. Table 3.5-16 demonstrates that although an impact conclusion may be the same for all alignment alternatives, the quantity of GHG emissions differs.

In regard to the commenter's statement that revitalization would occur along Hawthorne Boulevard, studies show that revitalization with transit investments is focused around station areas, typically within a quarter-mile to half-mile catchment area of the station, which is a considered a reasonable walking distance (5- to 10-minute walk). Both proposed stations in Redondo Beach include businesses along Hawthorne Boulevard within the station catchment area. See MR-14: Property Values and Impacts to Businesses.

45-6 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for its consideration. See responses to Comments 45-2 through 45-5. See also MR-10: Changes to Community Character.

Submission 50 Halland McKenna, McKenna Auto Group

50-1 Metro recognizes the importance of minimizing impacts to homes and businesses. The Hybrid Alternative, which travels along the Metro ROW, was selected as the LPA by the Metro Board in May 2024 in part because it would reduce the number of potential permanent property acquisitions compared to other alignment options.

However, the final decisions regarding the project, including the alignment to be approved, will not be made until after the Final EIR is certified and considered by the Metro Board.

Should permanent property acquisition be required, Metro would comply with all applicable laws and regulations, including the California Relocation Act (Government Code Section 7260 et seq.) and Metro's internal policies. Metro would provide relocation assistance and compensation to eligible displaced property and business owners, in accordance with these regulations. Just compensation would be based on the fair market value established by an approved appraisal, and all affected property owners would be notified in advance and informed of their rights and eligibility for assistance and benefits.

50-2 Metro notified all property owners along the proposed alignments as part of the environmental review process, including letters to all owners of properties that could be affected by the alignments studied in the Draft EIR. Business-specific outreach efforts have been conducted along each alignment under study. In addition to public meetings, Metro accepts comments from business owners through all standard channels, including email, phone, and written submissions. These comments are part of the public record and are considered in the environmental review and decision-making process. While formal negotiations related to property acquisition would occur only if and when the project is approved, Metro encourages input from all stakeholders throughout the environmental review process. Additionally, the Metro Board allocates funding for real estate. Businesses displaced as a result of the project would be given advance written notice and informed of their eligibility for relocation assistance and payments before being required to move. See response to Comment 50-1 for additional information on property acquisitions.

50-3 Metro works to avoid and minimize property acquisitions to the greatest extent possible, but in some cases, property acquisition is unavoidable. Metro published the 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR, and updated it in 2025 for LPA. See response to Comment 50-2.

50-4 Metro has not conducted an economic impact study for the project. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values or loss of property tax revenues are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. However, Metro's goal is to help businesses continue to operate throughout construction and post-construction. See MR-14: Property Values and Impacts to Businesses.

Submission 86 Craig St. John, Westwood Building Supplies

86-1 The commenter's opposition to the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. See response to Comment 86-2 related to construction traffic.

86-2 Based on the current level of design, construction of the Trench Option may take up to seven years. The LPA would take less time to construct than the Trench Option, given that there is significantly less area to excavate and is estimated to take approximately six years to construct. Construction would occur in phases and activities would be distributed throughout the entire project area. This means construction would not occur continuously in any one location. See Appendix 2-B, Construction Methods Memorandum, of the Draft EIR, for more detailed information on the construction duration. Additionally, Metro published a summary of estimated construction costs and schedule concurrent with the Draft EIR in 2023. See MR-21: Cost Estimates and Schedule for additional information.

Although construction activities would result in partial and full road closures, Metro is committed to minimizing disruption to local businesses. As part of Project Feature PF-T-1: Construction Traffic Management Plan, described in Section 3.1, Transportation, of the Draft EIR, the project would implement a Construction Traffic Management Plan (CTMP), which would manage closures, maintain access, and coordinate with businesses. For instance, the CTMP requires Metro to ensure that "vehicle and pedestrian access will remain available from at least one entry and egress point … during construction with access to businesses maintained during normal business hours." The CTMP also requires Metro to coordinate with impacted businesses to limit disruptions.

86-3 See response to Comment 86-2. Concurrent with the Draft EIR, Metro published the 2023 Transportation Detail Report, which provides discussions of constructed-related traffic conditions near the intersection of Inglewood Avenue and Manhattan Beach Boulevard. The project is early in the development process, and all construction plans are preliminary. As described on page 3.1-43 of the Draft EIR, construction would require some temporary partial and full road closures. For the Elevated/At-Grade Alignment, LPA, and Hawthorne Option, construction of the elevated light rail structure crossing over Manhattan Beach Boulevard may necessitate such closures. The LPA and Trench Option would also involve temporary partial or full road closures due to the excavation needed to build a trench beneath the road.

86-4 Section 3.5, Greenhouse Gas Emissions, of the Draft EIR, comprehensively studies greenhouse gas (GHG) emissions associated with construction activities, including idling from traffic delays and road closures. The analysis focuses on how the implementation of the project would affect regional GHG emissions, accounting for short-term emissions that would be generated by construction equipment and vehicle trips, as well as long-term, permanent changes in emissions during future operations. For construction-related GHG emissions, which are temporary by nature, the Draft EIR follows the South Coast Air Quality Management District (SCAQMD) Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold (2008), which states that for CEQA assessments, construction-related GHG emissions that occur over a relatively short-term period should be amortized over a 30-

year operational project lifetime. Important to the context for assessing short-term GHG emissions, Table 3.5-10 of the Draft EIR shows that the Elevated/At-Grade Alignment, Trench Option, and the Hawthorne Option would result in a long-term, operational reduction in regional GHG emissions by displacing passenger vehicle trips that would have otherwise occurred in the absence of light rail ridership. Similarly, the LPA would also result in a net GHG emissions reduction. Temporary, construction-related increases in localized GHG emissions associated with traffic delays and congestion would be offset by the long-term operational GHG benefits of the project.

Additionally, the provision of traffic detours to avoid street closures during construction would minimize excess GHG emissions that could occur from traffic delays. For example, as discussed in Section 3.1, Transportation, of the Draft EIR, the CTMP requires detour plans to reroute vehicular traffic to avoid street closures during construction.

86-5 Metro has not conducted an economic impact study for the project. Under CEQA, economic impacts such as changes in property values are not considered environmental impacts. Accordingly, the Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. Nonetheless, Metro understands concerns regarding property values. Metro is committed to supporting local businesses during construction and beyond. Small businesses may be eligible to apply for financial assistance through Metro's Business Interruption Fund, which is designed to cover certain fixed operating expenses during periods of construction and disruption. See MR-14: Property Values and Impacts to Businesses for additional information.

Submission 95 Right of Say/Redondo Beach Quality of Life Coalition

95-1 The comment states that, "the Metro Draft EIR is defective and fails to consider reasonably expected health and property value damages based on substantial evidence discussed below." See responses to Comments 95-2 through 95-26 for responses to specific comments.

Additionally, Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-10: Changes to Community Character.

95-2 State law preempts Metro from compliance with local zoning ordinances (*see Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996). The project is not subject to Redondo Beach Municipal Code 10-2.2502 related to Planning Design Review. Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project. The Metro ROW is owned by Metro, and not regulated by the City of Redondo Beach. The Redondo Beach Municipal Code does not apply to the Metro ROW.

95-3 The project does not violate Redondo Beach Municipal Code 4-24.301 related to noise. As noted in response to Comment 95-2, state law preempts the applicability of local zoning ordinances to Metro. Section 4-24.604 of the Redondo Beach Municipal Code expressly states that the noise standards set forth in section 4-24.301 do not apply to activities that are preempted by state law. Moreover, Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project and has utilized the FTA's noise impact criteria, which was specifically developed to address transit noise based on well-documented criteria and research on human response to community noise. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds. As discussed therein, application of the FTA criteria contrasts with the "brightline" operational noise thresholds used by many local jurisdictions, which set fixed operational limits without considering existing noise levels. In many cases, these city thresholds have already been exceeded by existing conditions.

95-4 The comment states that, "Project alternatives that use the existing freight right-of-way create a variety of health damages." See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. It is not technically feasible to correlate project-specific effects to specific health outcomes, given the complexity of factors contributing to these conditions. However, health effects related to air quality, noise, and other CEQA resources would be reduced with implementation of the proposed mitigation measures.

95-5 The comment states that, "Project alternatives that use the existing freight right-of-way damage child development." See response to Comment 95-4 and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

95-6 The comment states that, "The Metro Draft EIR is defective and fails to consider reasonably expected health and property value damages based on substantial evidence discussed below." See responses to Comments 95-7 through 95-10 for responses to specific comments. Also see MR-14: Property Values and Impacts to Businesses.

95-7 The referenced National Institutes of Health article does not discuss light rail train noise. It provides no evidence that the project would result in "significant and non-mitigable negative impacts on health and property values." Articles such as those cited by the commenter often address general or cumulative effects of noise from various types of rail or transportation systems, including heavy freight, passenger rail, and light rail. The project is a proposed light rail system, which operates differently than heavy rail or freight systems, with shorter and lighter trains and electric propulsion (reducing noise compared to diesel-powered freight trains). These distinctions mean that impacts identified in general studies may not directly apply to the project.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

95-8 The cited material does not provide evidence that light rail noise generates larger "impacts" than road traffic. In addition, such a generalized statement does not account for the type of on-road vehicle (e.g., heavy-duty truck versus electric vehicle), the distance from the source to the receptor (e.g., 25 feet versus 100 feet), and other important factors in ambient sound levels. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

95-9 While Metro acknowledges Beach Cities Health District's (BCHD) aim to promote community health, Metro cannot comment on BCHD's decisions or actions, as it is an independent entity. Therefore, questions regarding BCHD's decisions and priorities would best be directed to BCHD.

95-10 The cited Blue Zones article provides no evidence that the project would result in health effects. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

95-11 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. It should be clarified that the "fair argument" standard referenced in the comment applies to the determination of whether an EIR must be prepared in the first place. In this case, Metro has already prepared a full EIR in accordance with CEQA to analyze the potential environmental impacts of the project and options.

95-12 See response to Comment 95-2.

95-13 See MR-14: Property Values and Impacts to Businesses.

95-14 With respect to Redondo Beach Municipal Code 4-24.301, see responses to Comments 95-2 and 95-3. Also see MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

Although Metro is not subject to local zoning ordinances, pursuant to Mitigation Measure MM-NOI-1: Construction Noise Control Plan, Metro would obtain a variance from the applicable local jurisdiction when nighttime work is required.

The project would not operate 24 hours per day for seven days a week. The project is expected to follow the operating patterns of Metro's current rail lines. The anticipated hours of operation are 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes. This would result in a reduced frequency of trains during these hours and reduced overall noise compared to peak-hour system headways of 5 minutes. Weekend system headways would be reduced compared to weekdays.

95-15 See response to Comment 95-14.

95-16 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. See response to Comment 95-17 related to the cited Blue Zone Articles.

95-17 The cited "Blue Zones" report does not contain any comparison between high-capacity transit and widened roadways, nor does it state that transit service – let alone light rail

service – creates greater negative health outcomes than roadway expansion. Rather, the cited passage encourages active transportation, including walking, as a means of supporting community well-being and livability. The project is consistent with many of the principles described in the Blue Zones approach, including improving community connectedness.

95-18 See responses to Comments 95-8 through 95-14, which address the issues raised in this comment. Regarding health effects, see MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

95-19 The link provided for the National Geographic article on rail noise and stress in East Palestine is broken. Regardless, articles such as the National Geographic article often address general or cumulative effects of noise from various types of rail or transportation systems, including heavy freight, passenger rail, and light rail. The project is a proposed light rail system, which operates differently than heavy rail or freight systems, with shorter and lighter trains and electric propulsion (reducing noise compared to diesel-powered freight trains). These distinctions mean that impacts identified in general studies may not directly apply to the project. This comment does not dispute the contents of the Draft EIR. The Draft EIR, on page 3.6-48, explains why it is unlikely for light rail noise to result in noise-induced hearing loss, but acknowledges that increased levels in noise could increase stress at affected uses. Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs would reduce these effects.

95-20 The commenter submits an article titled, “Effects of Exposure to Road, Railway, Airport and Recreational Noise on Blood Pressure and Hypertension,” as evidence of project impacts. This comment does not dispute the contents of the Draft EIR. See response to Comment 95-19.

95-21 The commenter submits an article titled, “The Effect of Aircraft, Road, and Railway Traffic Noise on Stroke – Results of a Case-Control Study Based on Secondary Data,” as evidence of project impacts. The study referenced in the comment appears to focus on general railway noise, which often includes freight trains. Freight rail noise levels are typically higher than those from light rail transit, due to differences in propulsion systems, train length and weight, and horn usage. This comment does not dispute the contents of the Draft EIR. See response to Comment 95-19.

95-22 The commenter submits an article titled, “Transportation Noise and Risk of Tinnitus: A Nationwide Cohort Study from Denmark” as evidence of project impacts. This comment does not dispute the contents of the Draft EIR. See response to Comment 95-19.

95-23 The commenter submits an article titled, “A study of self-reported health problems of the people living near railway tracks in Raipur city,” as evidence of project impacts. This comment does not dispute the contents of the Draft EIR. See response to Comment 95-19.

95-24 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. It is not technically feasible to correlate project-specific effects to specific health outcomes, given the complexity of factors contributing to these conditions. However, health effects related to air quality, noise, and other CEQA resources would be reduced with implementation of the proposed mitigation measures.

95-25 See responses to Comments 95-1 through 95-24.

95-26 The commenter's opposition to the project is noted. The Metro Board has selected the LPA and has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. The final decision will be made after the Metro Board reviews the Final EIR, which will include responses to all public comments, including those of the commenter.

Submission 118 Barret Burt, Ganahl Lumber

118-1 Since publication of the Draft EIR, Metro has met with Ganahl Lumber multiple times to discuss the project and its potential effects on the property. As discussed in the coordination meetings, the project would require relocation and reconstruction of a spur track in the area, but this work would be phased and scheduled to occur during weekends to reduce disruption. Based on the proposed track modifications, construction would be completed during approximately five work windows, spaced out on non-consecutive weekends across 12 to 18 months. This approach is intended to avoid the need for facility closure and to minimize interference with day-to-day operations. Therefore, construction of the project would not lead to secondary impacts, such as increased truck traffic around the facility, or other effects that would materially alter site access or functionality. Metro will continue to coordinate with Ganahl Lumber to develop strategies and construction staging plans to minimize disruptions to Ganahl Lumber's operations.

Under CEQA, economic impacts are not considered environmental impacts. However, Metro is committed to minimizing disruption to local businesses. As part of Project Feature PF-T-1: Construction Traffic Management Plan described in Section 3.1, Transportation, of the Draft EIR, the project would implement a CTMP, which would manage closures, maintain access, and coordinate with businesses. For instance, the CTMP requires Metro to ensure that "vehicle and pedestrian access will remain available from at least one entry and egress point … during construction with access to businesses maintained during normal business hours." The CTMP also requires Metro to coordinate with impacted businesses to limit disruptions.

118-2 See response to Comment 118-1.

Submission 119 William Oberholzer, Undisclosed Business in Torrance

119-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 120 Yuki Escovar, Torrance Area Chamber of Commerce

120-1 The commenter's support for the Elevated/At-Grade Alignment is noted. Metro also notes the organization's stated concern for the Trench and Hawthorne Options. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

120-2 See response to Comment 120-1.

Submission 129 Tim Morey, Life Covenant Church

129-1 The commenter's concern for impacts to sensitive receptors at the Life Covenant Church is noted. All comments have been shared with the Metro Board for their consideration. See response to Comments 129-2 through 129-8.

129-2 Metro completed a Phase I Environmental Site Assessment (ESA), published as an appendix to the Draft EIR. The Phase I ESA identified the former AMP site located at 355-455 Maple Avenue, near Life Covenant Church, as a Recognized Environmental Condition (REC), due to its past history of contamination.

However, the construction limits in this area are located within the Metro ROW and do not include the AMP site or adjacent church property. As a result, no soil disturbance is anticipated near Life Covenant Church. As described in Section 3.9-4.4 of the Draft EIR, consistent with Project Feature PF-HHM-3: Property Acquisition Phase II Site Investigation, Phase II site investigations be conducted during the preliminary engineering phase for locations where construction activity could occur and where contamination is suspected. These investigations would assess the potential for contamination in soil, groundwater, and soil vapor. If contamination is found, appropriate remediation or corrective action would be implemented under the oversight of appropriate regulatory agencies and in compliance with all applicable laws and regulations.

Although the Metro ROW is near the former AMP site, Table 3.9-2 of the Draft EIR specifies that the planned limited Phase II site investigation in this location is intended to assess potential groundwater contamination only and does not involve excavation or disturbance of the site itself. Table 3.9-2 has been revised in Section 4.13, Corrections and Additions, of the Final EIR to clarify this point.

Regarding the identification of sensitive receptors, Section 3.9, Hazards and Hazardous Materials, of the Draft EIR does not define or inventory sensitive receptors in the same manner as other resource areas, such as air quality or noise. However, the analysis does evaluate whether the project could emit hazardous materials or involve hazardous activities within one-quarter mile of schools, which is required pursuant to Public Resources Code Section 21151.4. The presence of Life Covenant Church in proximity to the Metro ROW was considered in preparation of the Draft EIR and is factored into the commitment to conduct site-specific investigations and implement appropriate best-management practices. Metro remains committed to coordinating with nearby community facilities as the project advances into future phases of design and construction.

129-3 Potential impacts associated with soil stability, erosion, flooding, and subsidence are addressed in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. As discussed in Section 3.8-4.6 of the Draft EIR, the project would incorporate Project Feature PF-GEO-1: Metro Geotechnical Design Standards, which requires compliance with Metro's Geotechnical Design Standards, as outlined in the Metro Rail Design Criteria. These standards ensure that the final design is informed by detailed geotechnical investigations conducted during the preliminary engineering phase. These investigations would assess local soil conditions, including near sensitive community facilities, such as the Life Covenant

Church, and identify any risks of subsidence, settlement, instability, or lateral deformation due to project construction or operation. Where needed, appropriate design features, such as retaining walls with integrated drainage, would be implemented to address soil stability and manage stormwater runoff, including where bridge expansion is planned near the Maple Avenue/Del Amo Boulevard intersection. These drainage systems are designed to manage groundwater and prevent water accumulation behind the walls, thereby maintaining slope and structural stability during various weather events, including heavy rains. For the foregoing reasons, the Draft EIR concludes that construction and operational impacts associated with the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option are less than significant.

129-4 The light rail under the LPA, Trench Option, and Hawthorne Option would be fully grade-separated from all roadways, thereby entirely avoiding at-grade conflicts, including potential interference with emergency access. For the Elevated/At-Grade Alignment, the frequency of the railroad crossing gate-down time would increase relative to existing conditions; however, access for emergency vehicles would remain available via alternate routes within approximately a half-mile. See MR-12: Emergency Access.

Regarding potential emergency scenarios, such as derailment, fires, or seismic events, the project includes standard design requirements and operational practices that comply with federal and state regulations. See MR-8: Light Rail and Freight Train Safety for details.

Per CEQA, the Draft EIR evaluates whether the project would result in the need for new or expanded emergency service facilities due to physical environmental changes. The analysis in Section 3.15, Public Services, concludes that the project would not create such a need. Metro remains committed to working with local emergency service providers, including those serving the area around Life Covenant Church, to ensure emergency preparedness and safety during all phases of the project.

129-5 See MR-8: Light Rail and Freight Train Safety. As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed with physical barriers, such as fencing, soundwalls, or a combination of both, to prevent unauthorized intrusion. In many areas, the existing fencing has been breached, and would be repaired under the project, which would limit unauthorized access into the Metro ROW to ensure safety near operating rail. CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore, the Draft EIR does not make any conclusions regarding this topic.

129-6 The noise analysis in the Draft EIR follows the FTA Transit Noise and Vibration Impact Assessment Manual (2018), which specifies the use of 24-hour time-averaged noise levels to assess the ambient noise environment. These levels capture all sound sources, including the occasional freight train pass-by, as part of the existing baseline. The analysis also incorporates a 10-dBA penalty for all sound occurring during the nighttime hours (10:00 p.m. to 7:00 a.m.) to account for increased sensitivity to noise during these hours. The effect of the penalty is that in the calculation of 24-hour noise, any event that occurs during the nighttime hours is equivalent to 10 of the same events during the daytime hours. This ensures the assessment reflects the potential for greater disturbance from nighttime noise events.

The 24-hour noise measurements include both periods when the freight is not operating and periods when freight is operating. Although noise from freight trains is loud and increases the 24-hour average noise levels, its infrequent occurrence during the day means that it does not dominate or skew the overall noise profile. Excluding the freight noise from the existing ambient noise conditions would not comply with FTA methodology and would misrepresent the true ambient noise environment. For additional detail, see MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

Mitigation measures and project features include Mitigation Measure MM-NOI-3: Low Impact Frogs to reduce track crossover noise, Project Feature PF-NV-2: Crossing Signal Bell Shrouds to dampen crossing signal bells, and Project Feature PF-NV-3: Gate-Down-Bell-Stop Variance to limit the duration of bell ringing. See MR-3: Operational Noise Project Features and Mitigation Measures for more information.

The LPA and Trench Option would further reduce operational noise impacts compared to the Elevated/At-Grade Alignment by eliminating the at-grade light rail crossings at 170th and 182nd Streets. By grade-separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option remove the need for audible warnings at light rail crossings, such as routine train horns and crossing bells. The Draft EIR concludes that operational noise impacts from the LPA, Trench Option, and Hawthorne Option would be less than significant; Section 4.10, Corrections and Additions, of the Final EIR confirms this determination with respect to the LPA.

New landscaping would be included along the Metro ROW to enhance the aesthetic environment and attenuate noise. The specific soundwall materials and configurations would be determined at a later phase of design.

The commenter also requests a mitigation measure limiting construction near the church during Sunday morning and Wednesday evening services, Metro acknowledges the desire to avoid disruption to sensitive uses. However, due to the scale, complexity, and duration of the project, and the need to coordinate multiple construction crews and timelines across jurisdictions, restricting work during specific weekly hours at a single location is not feasible as a general mitigation requirement. Pursuant to Mitigation Measure MM-NOI-1: Noise Control Plan, Metro would require the contractor to implement reasonable noise controls (such as noise barriers and quieter equipment) and maintain a complaint response system to address site-specific concerns, including those related to church services. However, because it is possible that construction could still exceed the FTA construction noise criteria during certain activities, these impacts are disclosed in the EIR as significant and unavoidable.

129-7 The air quality analyses in the Draft EIR were prepared in accordance with SCAQMD guidance, which include assessing localized air quality impacts at sensitive receptor locations near construction activities. The Life Covenant Church is located approximately 450 feet from the nearest project footprint perimeter. The localized emissions analysis, as shown in Table 3.4-21 of the Draft EIR, evaluated impacts on sensitive receptors within 50 feet of the construction zone. The analysis concluded that localized air quality impacts would be less than significant. Because the Life Covenant Church is well beyond the 50-foot radius used in the analysis, there is no potential for significant air quality impacts related to pollutant

concentration exposures at this location. Project Features PF-AQ-1: Metro Green Construction Policy Compliance and PF-AQ-2: SCAQMD Rule 403 Compliance mandate the use of off-road construction equipment outfitted with engines meeting Tier 4 emissions standards and require stringent best-management practices to minimize fugitive dust generation, including the application of water to disturbed ground areas and material stockpiles and covering haul trucks with tarps. These measures are expected to substantially reduce diesel particulate matter and dust emissions near the construction zone and would also be required for the LPA.

129-8 As described in Section 3.6, Noise and Vibration, of the Draft EIR, Section 3.6-5, the project would be required to implement Mitigation Measures MM-VIB-3: Pre- and Post-Construction Surveys through MM-VIB-6: Ballast Mats, which would require low impact frogs, resilient rail fasteners, and/or ballast mats. With implementation of these mitigation measures, operational vibration levels associated with the project would be reduced to below FTA operational vibration impact thresholds.

Regarding construction vibration impacts, the Draft EIR identifies temporary vibration impacts that could occur from certain activities, including pile driving, heavy equipment operation, and other high-impact construction methods. To address these impacts, Mitigation Measures MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post-Construction surveys would be required.

The construction vibration annoyance impacts of each of the alignment options studied in the Draft EIR would be significant and unavoidable. These would be temporary and linked to the use of the most vibration-intensive types of equipment (e.g., pile drivers and vibratory compactors), which may only be in use for a short period near any given property. Although construction vibration damage impacts of the LPA, the Trench Option, and the Hawthorne Option would be less than significant with mitigation, this impact would be significant and unavoidable for the Elevated/At-Grade Alignment due to the need for pile driving to reconstruct the Grant Avenue Bridge. Implementation of the Mitigation Measures MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post-Construction Surveys would reduce the construction vibration impacts to the maximum extent feasible.

The Life Covenant Church at 308 Maple Avenue in Torrance is approximately 450 feet from the nearest project footprint perimeter, beyond the screening distance for vibration impacts for construction (see Table 3.6-19 of the Draft EIR) and annoyance (see Table 3.6-21 of the Draft EIR). Vibration impacts would, therefore, not occur at Life Covenant Church.

129-9 The commenter's support for a project with appropriate mitigation is noted. All comments have been shared with the Metro Board for their consideration. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project and will coordinate with the Life Covenant Church during future phases of the project.

Submission 139 Barbara Graham, Torrance Refining Company

139-1 Metro acknowledges the facts listed about TORC. The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.

139-2 Metro initiated coordination with TORC and TLC in 2022, prior to the release of the Draft EIR, and continues to coordinate with both parties.

The Draft EIR comprehensively addresses the potentially significant environmental impacts of the project. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. Also see MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety. Section 3.1, Transportation, of the Draft EIR evaluates hazards related to geometric design and emergency access. As concluded in the Draft EIR, impacts associated with such hazards would be less than significant.

To address the specific comments raised by both TLC and TORC, Metro has refined the project footprint to minimize the area of property affected by the proposed BNSF access road. In the Draft EIR, the access road alignment extended into the TORC property. In the Final EIR, the access road has been shifted to the west such that it remains entirely outside TORC's property, and within the existing Metro ROW, except where it connects to the existing BNSF access road parallel to Del Amo Boulevard. This adjustment minimizes the encroachment, preserves access for logistics and contractor activities, and maintains TORC's security perimeter. This refinement also helps reduce construction-related nuisances by moving construction activities farther from critical refining operations and eliminates the need to relocate the TLC pipeline in this area.

This minor adjustment does not result in new or substantially more severe significant environmental impacts not already disclosed in the Draft EIR. See Chapter 3, Design Refinements, and Appendix B, Select Advanced Conceptual Engineering Drawings for the Hybrid/Locally Preferred Alternative, of the Final EIR for more details on the revised access road.

While the EIR analyzes the environmental impacts associated with construction and operation of the proposed access road, some engineering details would be finalized during the Preliminary Engineering and Final Design phases. This would include finalizing utility protection measures, construction methods, and safety coordination protocols. Design and engineering would be conducted by qualified professionals with experience designing and constructing infrastructure adjacent to active refining and pipeline facilities or equivalent. Metro would continue to closely coordinate with TORC and TLC to address site-specific operational needs, utility protection measures, and compliance with all applicable health, safety, and environmental regulations.

See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-7: Utility Relocation and Hazardous Materials Safety; and MR-8: Light Rail and Freight Train Safety for more information.

139-3 Metro initiated coordination in 2022, prior to the release of the Draft EIR, and Metro continues to coordinate with TLC and TORC. Since the Draft EIR was released, the design has been refined so that the portion of the pipeline within the refinery property would not be affected. Should the Metro Board approve the project alignment along the Metro ROW, Metro would bring on design specialists as needed, to address oil and gas utility design. See response to Comment 139-2 for more information.

With respect to the refinery's flares, according to information provided by refinery staff in a February 24, 2024 meeting, a previous study was conducted for the Del Amo Boulevard bridge extension by the City of Torrance (Risk Management Professionals, 1999). That study determined that both planned and unplanned flaring would result in radiant heat levels below allowable thresholds and would not pose a hazard to the Del Amo Boulevard bridge, which is located approximately 500 feet away from the flares. This project would be more than 1,000 feet from the flares, a distance sufficient to ensure that radiant heat would not create a hazard for the project or its passengers.

In regard to the commenter's concern about restricting vehicle turning radii, the proposed maintenance access road, as refined, would be located almost entirely outside of the refinery property and would not affect the refinery's internal access roads or the unpaved areas adjacent to them. Only a small section of the proposed access road would be on the refinery property, but it would be located in an area where there are existing BNSF tracks. As such, it is not an area typically used for vehicle turning movements. Therefore, the project would not impact refinery vehicle turning movements or emergency access needs.

Given that the proposed maintenance access road has been shifted to be almost entirely outside of the refinery property, the project would not affect future utility maintenance and access needs in that area. Although there is a small section of the proposed road remaining within the refinery property boundaries, this section of the proposed roadway would not preclude utility owners from accessing or maintaining their pipelines in this area. Furthermore, there are no pipelines within the refinery's property that would need to be relocated or modified. Therefore, there would not be construction impacts within the refinery property. Utilities within the existing railroad corridor would be relocated or protected-in-place as needed; see MR-7: Utility Relocation and Hazardous Materials Safety for more information regarding how construction around utilities would be handled.

139-4 The Draft EIR evaluates the potential for significant environmental impacts related to hazardous materials, public safety, and proximity to industrial operations in Section 3.9, Hazards and Hazardous Materials. Operation of the light rail alignment through areas with existing industrial land uses along the Metro ROW would not lead to reasonably foreseeable accidental release of hazardous materials into the environment. The project alignment has been designed to maintain appropriate setbacks, and the project includes multiple safety and security design elements, including fencing, grade separations, and access control to prevent unauthorized entry. The project would comply with relevant safety standards,

including those established by the Federal Railroad Administration (FRA), the FTA, the California Public Utilities Commission (CPUC), Metro, and BNSF Railway.

The commenter states that the refinery's tank farm is located within approximately 420 feet of the Metro ROW and the two main emergency flares are located approximately 1,000 feet from the Metro ROW, which the commenter states could cause impacts on the project. However, CEQA requires an analysis of a project's impacts to the environment and typically does not require the reverse analysis (i.e., the environment's impact on the project), unless the project itself might worsen existing environmental hazards. While the project would be located near TORC, it would not exacerbate existing industrial hazards at the refinery. Thus, an evaluation of potential emergency scenarios involving the refinery's facilities and their effects on future light rail passengers is not required under CEQA. Furthermore, Metro does not anticipate flare-related heat effects to project components or passengers at this distance. Metro would work with the refinery to coordinate emergency communication systems so that in the event of an emergency, Metro could hold or detour trains to avoid traveling near the refinery.

Metro acknowledges the request for a third-party study to assess potential impacts associated with safety, security, land use, and other impacts, and has prepared a Preliminary Hazards Analysis. As discussed in response to Comment 139-2, Metro coordinated with TORC staff in February 2024 to discuss refinery operations. Based on a previously prepared study referenced by TORC staff, Metro determined that flaring would not pose a hazard for the project or its passengers given the project's distance from the flares. Furthermore, the proposed light rail would operate on a dedicated rail alignment, with no pedestrian or bicyclist access along the tracks. Passenger access to the rail line would occur exclusively at designated stations, which are located at a significant distance from the refinery's flare system. The alignment adjacent to the refinery is grade-separated and would not introduce routine pedestrian, cyclist, or vehicular access into the immediate vicinity of the flares.

Access across the railroad corridor would still be maintained at all existing crossings, and no evacuation routes would be eliminated. The entire light rail alignment, including the portion adjacent to the refinery, would be constructed and operated in accordance with applicable safety standards, including, but not limited to, those established by Metro, FTA, FRA, and CPUC. These include appropriate emergency response protocols, setbacks, and systemwide safety planning to address coordination with local agencies in the event of emergencies. See MR-8: Light Rail and Freight Train Safety.

The project would not change the refinery's access roads and, therefore, would not affect the ability of refinery employees and contractors to vacate the area during operations.

As discussed in the response to Comment 139-2, the design of the proposed maintenance access road has been refined to minimize encroachment into the refinery property and stay within the railroad corridor. With the design refinement, only a small section of the access road would encroach into the TORC property in order to connect to an existing BNSF access road that runs parallel to Del Amo Boulevard.

139-5 As described above, the proposed BNSF access has been refined to minimize encroachment into the Refinery property and stay within the railroad corridor. The project would not alter

the refinery's existing security procedures or introduce new operational uses that would interfere with the facility's regulatory obligations. The light rail guideway would remain physically separated from the refinery site, and Metro does not propose any new public access points, facilities, or station entrances in or adjacent to TORC's secured perimeter. Furthermore, the entire light rail guideway would be enclosed by a physical barrier, such as fencing, soundwalls, or a combination of both, to prevent unauthorized access. Construction of the project would occur primarily within the existing Metro ROW, except for a small section of the proposed maintenance access road near Del Amo Boulevard. The Chemical Facility Anti-Terrorism Standards (CFATS) program requirements and statutory authority, established by the Protecting and Securing Chemical Facilities from Terrorist Attacks Act, expired in 2023. Nonetheless, Metro acknowledges both the intent of the now voluntary program, as well as the likelihood that similar requirements currently apply or may be enacted at any future date. Accordingly, Metro would continue to coordinate with TORC through future phases of the project to ensure integration, verification, and validation of required information that would assist in meeting and maintaining compliance with applicable safety and security regulations during both construction and operation of the project.

Metro also notes that while construction of the project would occur primarily within the existing Metro ROW (except for a small section of proposed maintenance access road near Del Amo Boulevard), the project's adjacency to the TORC facility would necessitate ongoing coordination of safety and security planning to ensure the refinery maintains compliance with regulatory requirements. Metro remains committed to ongoing coordination with TORC to ensure that project design and construction activities are compatible with the refinery's established security measures and do not impede the facility's compliance with applicable federal regulations.

Under CEQA, the appropriate inquiry is whether the proposed project would result in or exacerbate significant environmental impacts, including through the creation of new hazards or safety risks. See Section 3.9, Hazardous Materials, of the Draft EIR, which concludes that the project would not interfere with an adopted emergency response plan or emergency evaluation plan. The project would not impede access to evacuation or disaster routes. The project would not introduce new residential or commercial uses in proximity to the refinery, nor would it change the land use designation or affect the refinery's operations or assumptions underlying its risk management. The LPA, Trench Option, and Hawthorne Option would fully grade separate light rail from all roadways, and none of the alignments studied in the Draft EIR would significantly impact emergency access; see MR-12: Emergency Access for more information. Metro understands that TORC is required to comply with specific state and federal regulations, because of the nature of its operations. However, the project would not affect TORC's operations, including, but not limited to, the use of certain types of materials at the refinery. Furthermore, the project design was refined so that the proposed maintenance access road is outside of the property boundaries and, therefore, would not affect the ability for local agencies to respond to emergencies associated with the refinery. Metro would work with the refinery to coordinate emergency communication systems so that in the event of an emergency, Metro could hold or detour trains to avoid traveling near the refinery. Such actions are incorporated into the project as Project Feature PF-PS-1: Coordination with Torrance Refining Company and Emergency Responders and is described further in Chapter 4, Corrections and Additions, of the Final EIR.

As described in Chapter 2, Project Description, of the Draft EIR, the project would be constructed primarily within Metro's existing ROW. As described above, the proposed BNSF access road has been refined to minimize encroachment into the TORC property and stay with the Metro ROW. As a legislatively created regional transportation authority, Metro is not subject to local zoning and setback requirements when implementing a project within its legal authority (see *Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996). Nonetheless, CEQA requires the EIR to evaluate whether the project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. That analysis is provided in Section 3.2, Land Use and Planning. As discussed therein, the project would not conflict with the goals or policies of the City of Torrance General Plan or zoning provisions adopted for environmental protection purposes. Furthermore, the City of Torrance's zoning code does not dictate setback requirements from property boundaries, but rather, it defines setbacks for buildings and structures from secondary and major highways, which range from 40 to 50 feet (Torrance Municipal Code, Article 92.7.4). As shown in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, the access road would have been approximately 100 feet from the nearest structure. With the design refinement included in the Final EIR, the proposed access maintenance road would be located even farther away from any structures. Metro will continue to coordinate with the City of Torrance and TORC as the project advances to ensure safety, compatibility and access during implementation.

139-6 Metro has engaged in extensive public outreach, holding numerous meetings and community events to gather input from residents, businesses, and stakeholders. The EIR process has involved detailed analyses of environmental impacts and close coordination with multiple agencies. The environmental impacts of the project have been thoroughly evaluated, with a focus on mitigating significant impacts to the maximum extent feasible. Importantly, the Metro Board will not reach a final determination on the project until after the Final EIR is completed and released to the public. The Metro Board's decision will be based on the information gathered through the entire EIR process, including the comments on the Draft EIR and the responses to comments. The project timeline accounts for activities needed to ensure safe construction and operation of the project. An updated timeline for the LPA is included in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR.

Metro has conducted a thorough analysis of all potential environmental impacts of the project and has not rushed the process to meet any artificial deadlines. The Draft EIR reflects a good faith analysis of foreseeable impacts, including those related to the project's proximity to TORC's property and TLC's property. The project has not been "piecemealed." Instead, the Draft EIR evaluates the whole of the project, including all reasonably foreseeable future phases of the project. The commenter asserts that mitigation measures related to potential security, safety, and land use were deferred. The mitigation measures identified in the Draft EIR are not impermissibly deferred. Where it was not practical or feasible to develop all details of the mitigation measure in the Draft EIR, the mitigation measures commit Metro to implementing mitigation, identify specific performance standards that the mitigation would achieve, and identify types of actions that could feasibly achieve those performance standards. Additionally, the Final EIR was not issued until all

comments, including those from TORC, were reviewed and addressed. The Metro Board will not make a final determination on the project unless and until it certifies the Final EIR.

Submission 186 Torrance Democratic Club

186-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

186-2 See MR-17: Response to Torrance Community Letter.

186-3 The commenter's opposition to the Hawthorne Option is noted. See MR-17: Response to Torrance Community Letter.

186-4 See MR-17: Response to Torrance Community Letter.

Submission 367 Right of Say/ Redondo Beach Quality of Life Coalition

367-1 Metro recognizes that individuals with increased auditory sensitivity, such as those with sensory disorders, may be particularly affected by noise and that there are other potentially vulnerable populations, including children, seniors, and people with disabilities.

Section 3.6, Noise and Vibration, of the Draft EIR, provides a detailed and project-specific analysis of noise impacts, including their potential effects on sensitive receptors like residences, consistent with CEQA and the FTA's Transit Noise and Vibration Impact Assessment Manual (2018). Metro acknowledges that increased noise levels could contribute to stress and other health effects, as noted on page 3.6-48 of the Draft EIR.

The Draft EIR also includes several mitigation measures intended to reduce noise impacts during construction and operation of the project, including Mitigation Measure MM-NOI-1: Noise Control Plan to reduce noise levels generated by construction to below the FTA construction noise criteria to the maximum extent feasible, Mitigation Measure MM-NOI-2: Soundwalls to minimize operational noise impacts along impacted segments of the Metro ROW, Mitigation Measure MM-NOI-3: Low Impact Frogs to reduce wheel noise and rail crossovers, and Mitigation Measure MM-NOI-4: Quiet Zone Establishment to establish a "quiet zone" along the Metro ROW from north of Inglewood Avenue to south of 182nd Street, to prevent routine sounding of freight horns. With the establishment of a quiet zone, freight train noise along the Metro ROW would be reduced, overall, compared to current conditions. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures.

It is not technically feasible to correlate project-specific noise impacts to specific health outcomes, given the complexity of factors contributing to these conditions. However, with implementation of the proposed mitigation measures, noise levels associated with construction and operation of the project would be reduced. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

367-2 Section 4-24.301 of the Redondo Beach Municipal Code, cited by the comment, sets forth presumed ambient noise standards for residential zones. Metro is not subject to local zoning ordinances, a fact reflected in the Redondo Beach Municipal Code. Section 4-24.604 of the Redondo Beach Municipal Code specifies that the provisions of Section 4-24.301, cited by the comment, do not apply to any activity that is preempted by state or federal law. The project is preempted from local zoning ordinances (see *Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996). Therefore, the standards cited by the comment do not apply.

As noted above, the Draft EIR evaluates operational noise impacts in accordance with the FTA Transit Noise and Vibration Impact Assessment Manual (2018), which is the applicable and industry-accepted standard for evaluating transit noise impacts. The FTA methodology relies on Ldn (day-night average sound levels), which includes a 10-dBA (A-weighted decibel) nighttime penalty to account for increased sensitivity to nighttime noise. This method allows for a cumulative, 24-hour evaluation of project-related noise and is specifically designed for transit projects like this one. By the very nature of the FTA thresholds, which are based on existing noise levels, a less than significant impact is within the allowable level of noise that would not cause a substantial increase in noise to the community. Although, as noted in Section 4-24.604 of the Redondo Beach Municipal Code, Section 4-24.301 does not apply to the project, Metro recognizes the importance of addressing community concerns regarding nighttime noise. Accordingly, Metro has undertaken a comprehensive analysis of both construction and operational noise impacts in accordance with FTA standards and regulatory best practices, and has committed to implement stringent, enforceable noise mitigation to minimize potential disturbance to nearby residents. It is also important to clarify that the Redondo Beach Municipal Code thresholds cited by the commenter represent presumed ambient levels, which are not fixed limits on all noise-generating activity and may be exceeded by existing conditions. In cases where the existing measured noise level is higher than the presumed ambient noise level, then that becomes the exterior noise threshold.

The Draft EIR and Final EIR conclude that with implementation of mitigation measures, including MM-NOI-2: Soundwalls, MM-NOI-3: Low Impact Frogs, and MM-NOI-4: Quiet Zone Establishment [for the ROW alignments], operational impacts of the LPA, the Trench Option, and the Hawthrone Option would not exceed the FTA operational noise thresholds. Only the Elevated/At-Grade Alignment would have a significant and unavoidable impact, caused by the necessary gap in the soundwall for vehicle access and the need for warning devices at the at-grade crossing near 170th Street.

See also MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

367-3 The Draft EIR's operational noise analysis follows the Detailed Noise Analysis Procedure per the FTA's Transit Noise and Vibration Impact Assessment Manual (2018). The Detailed Noise Analysis Procedure evaluates all relevant light rail sources of noise, including light rail pass-bys, traction power substations (TPSS), special trackwork, and warning devices at crossings. The analysis also considers mitigation measures, such as soundwalls. The commenter expresses concern that the proposed soundwalls may worsen noise conditions on the west side of the Metro ROW, especially where the freight track would be shifted closer to homes.

The noise analysis explicitly accounts for this potential and incorporates the reflective properties of standard soundwalls and their effect on sensitive receptors. Where reflective noise could potentially increase impacts to nearby receptors, absorptive soundwalls, which minimize reflected noise, have been recommended to reduce noise levels to below the FTA noise criteria.

As shown on page 3.6-53 of the Draft EIR, soundwalls are proposed along both the west and east sides of the Metro ROW, from immediately south of the 182nd Street crossing to Inglewood Avenue. These barriers are designed to reduce noise for sensitive receptors on both sides of the corridor, including those adjacent to the relocated freight track. As noted, reflective noise would be addressed through absorptive soundwalls where necessary to ensure noise levels do not exceed the FTA noise criteria.

The FTA noise standards used in the analysis are based on exterior noise levels, meaning that impacts were evaluated without assumed closed windows or air conditioning. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

367-4 See response to Comment 367-3.

367-5 Noise monitoring was conducted at locations 17, 18, and 23 in the City of Redondo Beach, as shown in Figure 3.6-7 of the Draft EIR. Noise monitoring location 23 is specifically on the west side of the Metro ROW. These measurements were conducted in accordance with the FTA Transit Noise and Vibration Impact Assessment Manual (2018), which permits the use of representative measurements to establish existing noise levels for areas with similar existing noise conditions. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

367-6 To clarify, the establishment of a quiet zone, as described in Project Feature PF-NV-1: Quiet Zone Equipment Establishment and Mitigation Measure MM-NOI-4: Quiet Zone Establishment, pertains to eliminating freight horn noise at crossings and is not related to light rail noise or the project features (PF-NV-2: Crossing Signal Bell Shroud and PF-NV-3: Gate-Down-Bell-Stop-Variance) referenced in the comment. Project Features PF-NV-2: Crossing Signal Bell Shroud and PF-NV-3: Gate-Down-Bell-Stop-Variance specifically address noise from crossing signal bells near light rail at-grade crossings, (170th and 182nd Streets for the Elevated/At-Grade Alignment) but are not part of a quiet zone designation. Noise generated by light rail pass-bys would be mitigated through Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs.

Like the Trench Option, the LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment, because it eliminates the at-grade crossings at 170th and 182nd Streets. Likewise, the Hawthorne Option would fully grade separate the light rail. By grade-separating the light rail from all roadways, the LPA, the Trench Option, and the Hawthorne Option avoid the need for audible warning at light rail crossings, such as routine light rail train horns and crossing bells.

If the Elevated/At-Grade Alignment were implemented, the addition of the light rail crossing at 182nd Street would increase the frequency of the crossing gate down time relative to existing conditions but would not permanently close emergency access. All of the homes

and businesses on either side of the 182nd Street crossing would remain accessible by alternate routes within a half-mile that have grade-separated crossings and are, therefore, not affected by train frequency. While McCormick Ambulance Services currently operates near the 182nd Street at-grade crossing, McCormick, as a private business, is not restricted to this location and could adjust its base location if future needs arise. Any such relocation of McCormick Ambulance Services, or a similar private business, would likely occur within already developed commercial or industrial properties, involving leasing or minor modifications to existing structures rather than new construction and would utilize existing infrastructure.

The LPA, the Trench Option, and the Hawthorne Option, which would fully grade separate the light rail from all roadways, would eliminate any potential impacts of the light rail on emergency response time. See MR-12: Emergency Access.

367-7 See response to Comment 367-2. Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project and has utilized the FTA's noise impact criteria, which was specifically developed to address transit noise based on well-documented criteria and research on human response to community noise.

Additionally, see MR-2: Operational Noise Analysis Methodology and Impact Thresholds. As discussed therein, application of the FTA criteria contrasts with the "brightline" operational noise thresholds used by many local jurisdictions, which set fixed operational limits without considering existing noise levels, and in many cases, these city thresholds have already been exceeded by existing conditions. For instance, the maximum presumed ambient noise level standards established by Redondo Beach Municipal Code Section 4-24.301 for uses considered sensitive receptors range from 45 dBA for Low Density uses to 60 dBA for Residential R-5 and R-6 uses. However, as detailed in Table 3.6-17 of the Draft EIR, existing noise levels at the majority of sensitive receptor clusters in proximity to the Trench Option already exceed the foregoing maximum presumed ambient noise level standards. Thus, Metro's application of the FTA criteria to evaluate the potential for project construction and operational activities to result in substantial temporary or permanent increases in ambient noise levels is more applicable than simply assessing whether project noise levels would exceed local standards.

367-8 The commenter's preference for the Hawthorne Option followed by the High-Frequency Bus Alternative is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 399 Right of Say/ Redondo Beach Quality of Life Coalition

399-1 The commenter's observation that the City of Lawndale has a high population density and limited park space relative to other South Bay cities is noted. All comments have been shared with the Metro Board for their consideration. Under CEQA, population density and park acreage are not treated as environmental impacts, in and of themselves. However, the Draft EIR considers whether the project would result in physical environmental effects related to the availability of park space. As discussed in Section 3.15, Public Services, of the Draft EIR, Section 3.15-4.5, the project would not result in the direct removal or degradation of parks facilities in the City of Lawndale or elsewhere. The project is also not expected to

increase the use of existing parks in a way that would result in physical deterioration or require the construction or expansion of recreational facilities. Therefore, the Draft EIR concludes that the project would have a less than significant impact related to parks.

399-2 See response to Comment 399-1. Although Metro understands that some residents use the freight corridor for informal recreational activities, this use is not authorized and is not compliant with freight safety standards. The Metro ROW is not a park, but rather an active freight corridor. The use of the Metro ROW for recreation is not sanctioned and does not constitute a designated public resource under CEQA.

To enhance recreational opportunities, the project would include two multi-use recreational paths and new landscaping in areas where space allows, providing safe and accessible amenities for the community. Within Lawndale, the path would be provided between 159th and 170th Street on the west side of the freight tracks. The planned multi-use paths are designed to provide a safe and accessible environment for walking, jogging, and bicycling, and they represent an improvement over current conditions, including in Lawndale where dedicated recreational infrastructure is limited.

Additionally, in 2022, Metro adopted a Metro Tree Policy which outlines Metro's commitment to protecting trees, when possible, and replacing those that must be removed as a result of Metro construction and maintenance. For non-heritage trees, the policy specifies a replacement ratio of two trees for every tree removed. Metro's policy prioritizes planting strategies that maximize the use of native species, thereby enhancing the local ecosystem. See MR-10: Changes to Community Character.

399-3 The commenter's opposition to the Metro ROW alignments is noted. See MR-10: Changes to Community Character.

399-4 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR analyzes the project's potential to physically divide communities and to affect visual quality and character. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. A physical divide to an established community means a physical division, such as the construction of a new barrier that severs access between neighborhoods. The Metro ROW alignments would be constructed within an existing transportation corridor, rather than previously undisturbed areas. As discussed in the Draft EIR, the presence of the Elevated/At-Grade Alignment would not physically divide a community, because residents would still be able to cross the Metro ROW at all existing designated rail crossings located at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered such that any one part of the community would be isolated from the other. Operation of the LPA, Trench Option, and Hawthorne Option have even less potential to physically divide an existing community, because each would fully grade separate the light rail from all roadways. Construction would occur in phases, so not all disruptions would happen at once, reducing the potential to divide communities. A CTMP would be implemented to maintain access for vehicles, pedestrians, and cyclists throughout all phases, consistent with Metro's standard practices. For these reasons, the Draft EIR concludes construction and operation of the Elevated/At-Grade Alignment and Trench Option would not physically divide an established community, and the impacts would be

less than significant. The Hawthorne Option would similarly result in a less than significant impact during project operation and would result in a less than significant impact during construction with implementation of Mitigation Measure MM-LU-1: Temporary Crossings. MM-LU-1: Temporary Crossings requires a nearby temporary alternate crossing where the closure of crosswalks or other pedestrian roadway crossings and an alternate crossing route do not exist within 1,000 feet of the closed crossing. See also response to Comment 399-2 and MR-10: Changes to Community Character.

399-5 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. The project would not introduce ground movement that would exceed tolerances for underground infrastructure. For more information on this topic, see MR-7: Utility Relocation and Hazardous Materials Safety. For additional background, see MR-8: Light Rail and Freight Train Safety and MR-13: Soil Stability and Sinkholes.

399-6 William Green Elementary School is correctly identified in Table 3.15-9 on page 3.15-21 of the Draft EIR as being 0.13 miles (686 feet) from the Metro ROW. The commenter may be referring to William Green Park, which is utilized by the school for recreational activities and is located 350 feet from the Metro ROW at its closest point and 686 feet from the Metro ROW at its farthest point.

Construction activities would not require the acquisition of any public facilities, including educational facilities. Roadways that intersect the alignment would need to be temporarily closed or have lanes reduced to accommodate construction activities, which could impede the vehicle circulation network, though traffic would be detoured to a parallel route (for example, with a closure at 170th Street, all traffic would detour to 162nd Street or Artesia Boulevard). Construction activity would be limited to the Metro ROW and staging areas and would not result in direct physical impacts to any school. Additionally, access to the schools would be maintained during construction, and detour routes would be included pursuant to Project Feature: PF-T-1: Construction Traffic Management Plan (see Section 3.1, Transportation, of the Draft EIR). Therefore, construction activities would not result in the need for new or physically altered educational facilities, and this impact would be less than significant.

The project would not increase the demand for school facilities, requiring the provision of new or expanded educational facilities. Operation of the project would indirectly increase local access to educational facilities. However, it is anticipated that students and faculty would remain within their associated school districts, and an increase in attendance would not occur as a result of the project. Additionally, the project is included in the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as a planned transit project and is, thus, factored into demographic forecasts for future population, household, and employment growth for the cities of Lawndale, Hawthorne, Redondo Beach, and Torrance. Accordingly,

the project would not induce unplanned population growth that would impact the demand for school facilities. Therefore, no impact would occur.

399-7 See response to Comment 399-4.

399-8 The project would add new safety fencing or other barriers, such as soundwalls, to the Metro ROW. However, access across the railroad corridor would still be maintained at all existing crossings, and no evacuation routes would be eliminated.

399-9 In the previous planning stage (2018 Supplemental Alternatives Analysis), Metro studied proposed stations in the City of Lawndale, between Inglewood Avenue and Manhattan Beach Boulevard along the Metro ROW, and at Hawthorne Boulevard/166th Street. However, at the request of the City of Lawndale, Metro removed these proposed stations from further study. Metro is adhering to all CEQA requirements. Furthermore, Metro's design and planning process complies with all applicable safety regulations. See MR-8: Light Rail and Freight Train Safety.

399-10 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

399-11 The comment is noted for the record.

Submission 403 Craig St. John, Westwood Building Materials

403-1 The property identified by the commenter is identified as a potential location for a TPSS, as well as for a sump pump for the Trench Option. The Hybrid Alternative was selected by the Metro Board as the LPA, which would not require a sump pump and/or a TPSS on that property. See MR-1: Selection of Alternatives. The Draft EIR evaluated multiple options for the TPSS locations, which would be determined in the next phase of design.

403-2 The commenter's preference for an overhead design configuration of the Metro ROW alignments at Inglewood Avenue and Manhattan Beach Boulevard is noted. See MR-1: Selection of Alternatives.

403-3 Approximately 178 residential properties are located immediately adjacent to the Metro ROW, and 22 residential properties are located immediately adjacent to the Hawthorne Option. Metro has designed the project to avoid displacement of residents.

Submission 404 Craig St. John, Westwood Building Materials

404-1 See response to Comment 403-3 related to residences located adjacent to the project. Of the alignments studied in the Draft EIR, only the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact. Operational noise impacts associated with the Trench Option, Hawthorne Option, and the LPA would be reduced to less than significant with mitigation. None of the alignments analyzed in the Draft EIR would result in a significant and unavoidable operational vibration impact. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To

address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

404-2 See response to Comment 403-3.

Submission 405 Craig St. John, Westwood Building Materials

405-1 Submission 404 includes the same comments from the same commentor. See responses to Comment Letter 404.

Submission 435 Daniel Walker, Friends of Green Line

435-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

435-2 The terminus station at the Torrance Transit Center would allow the line to continue further south, should funding and approvals become available. Any future extensions would be subject to their own environmental review and planning processes. Potential extensions from the Torrance Transit Center to San Pedro, Long Beach, and the Los Angeles County/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan.

435-3 The commenter's support of the Elevated/At-Grade Alignment is noted. The Metro Board selected an LPA located in the Metro ROW. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits, and costs.

435-4 The 2023 Ridership Summary Report, published concurrently with Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). Ridership levels vary by alignment, as discussed in the report. However, travel times are similar between all alignment options.

435-5 The commenter's opposition to the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. Both the LPA and the Trench Option significantly reduce noise impacts compared to the Elevated/At-Grade Alignment, because they eliminate the at-grade light rail crossings at 170th and 182nd Streets. By grade-separating the light rail from all roadways, the LPA and the Trench Option remove the need for audible warning at light rail crossings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, and Section 4.20, Corrections and Additions, of the Final EIR, operational noise impacts of the LPA would be comparable to those of the Trench Option and would be less than significant with mitigation.

Regarding freight train noise, the alignment options along the Metro ROW, including the LPA and Trench Option, would include Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment, which are expected to reduce freight noise compared to existing conditions. See MR-3: Operational Noise Project Features and Mitigation Measures.

435-6 The commenter's support for the alignment along the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. As correctly noted by the comment, light rail vehicles are electrically powered and generally operate more quietly than diesel-powered trains. As indicated by the commenter, improvements to the relocated freight tracks under the Metro ROW assignments are anticipated to reduce noise and vibration from freight operations. Furthermore, the Metro ROW alignments include Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment, which would reduce freight noise compared to existing conditions by enabling the establishment of a quiet zone with the FRA, which would eliminate the routine use of train horns along this portion of the Metro ROW. Once all necessary safety measures are installed, the quiet zone may qualify for automatic approval under federal regulations (49 CFR 222). See MR-19: Project Benefits for additional information.

435-7 The project schedule will continue to be updated as refinements to the design, project cost estimates, and funding plan. While offering financial incentives to construction contractors for early completion is worth considering, accelerating the project would present significant challenges. These include securing additional funds, expediting the procurement process, coordinating condensed review and permit approvals from public and private entities, and managing an intensive, compressed construction period. Each of these elements requires careful planning to ensure that safety, environmental regulations, and community impacts are appropriately addressed. Metro remains committed to delivering the project as efficiently as possible while balancing the need to control costs and ensure compliance with all necessary approvals.

435-8 Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including funding availability, costs, implementation efficiency, stakeholder input, and environmental impacts. All options and alternatives remain under consideration until the Metro Board takes final action on the project and its Final EIR. The project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro remains committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery.

435-9 The project would provide a one-seat ride from Torrance to the Los Angeles International Airport (LAX) and operate as part of the Metro K line in a north-south pattern with connections to the Metro C Line, which travels east-west and provides access to Norwalk.

435-10 The commenter's support for safety enhancements to support a quiet zone is noted. All comments have been shared with the Metro Board for their consideration. The establishment of quiet zones, which eliminate the use of train horns, is governed by the FRA, not the CPUC. See response to Comment 435-6.

435-11 The proposed stations are intended to enhance regional transportation multi-modal mobility and access. The project includes two multi-use recreational paths to enhance pedestrian and bicycle connectivity. Bicycle parking would be provided at all stations. While

Metro assists in identifying potential First/Last Mile improvements during the planning and design phases, the implementation of off-site access improvements falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in this planning.

435-12 The commenter's support for a station in Lawndale is noted. All comments have been shared with the Metro Board for their consideration. In the previous planning stages, stations were proposed in Lawndale, including as part of the 2018 Supplemental Alternatives Analysis, but at the request of the City of Lawndale were removed from consideration.

435-13 The commenter's support for the project related to regional access and environmental/community benefits is noted.

435-14 See response to Comment 435-13.

Submission 453 Ed Romero, Marathon Pipe Line LLC

453-1 Metro acknowledges the location of pipelines 217A and 088C and the request not to dig within 50 feet of the identified locations without coordinating with Marathon Petroleum. Section 3.11, Utilities and Service Systems, of the Draft EIR evaluates potential impacts associated with utility conflicts. As described on page 3.11-10 of the Draft EIR, the project includes Project Feature PF-US-1: Utility Identification and Coordination, which would ensure that the locations of all utilities potentially affected by project activities are verified prior to construction. This includes conducting detailed field verification methods, such as potholing, to confirm the horizontal and vertical alignment of pipelines and other utilities. The information obtained through this process would be used in coordination with utility owners, including Marathon Pipeline, to determine appropriate measures to either protect utilities in place or relocate them as necessary. Metro would coordinate with Marathon Pipeline and Dig-Alert to provide notice prior to any excavation activities. See MR-7: Utility Relocation and Hazardous Materials Safety.

Submission 752 Mark Navarra, Jerome's Furniture

752-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

752-2 The commenter's opposition to the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Under CEQA, economic effects, such as financial effects on businesses, are not considered environmental effects. Metro has created a Business Interruption Fund for major rail projects under construction in Los Angeles County to support the business community.

Submission 1958 Right of Say

1958-1 Freight rail operations, including transportation of hazardous materials, are regulated by the FRA and must comply with stringent federal regulations related to the handling, labeling, and transport of hazardous substances. The project would not alter or increase the frequency of freight operations or the types of materials transported along the corridor. Nonetheless, Metro is committed to integrating safety into all Metro rail operations,

including designing and operating the project to ensure compatibility alongside freight operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, and Metro's Grade Crossing Safety Policy. For more information, see MR-8: Light Rail and Freight Train Safety.

1958-2 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line like those operated by Metrolink or freight rail operated by BNSF. Light rail vehicles are quieter, electrically powered trains that generate less noise and vibration compared to larger, diesel operated Metrolink trains and freight operators. As discussed in Section 3.6, Noise and Vibration, subsection 3.6-4.3.2, impacts associated with operation of the light rail and freight would be reduced to less than significant with mitigation. With respect to building damage during construction, Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, preconstruction site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged. These recommendations would be a product of and confirmed during final design and address potential subsurface hazards. See also MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

1958-3 The Final EIR includes updates to the construction duration for the LPA, which is estimated to take approximately six years to construct. Construction-related activities would proceed in phases, limiting the duration of any impacts at a given location. See MR-21: Cost Estimates and Schedule. Additionally, existing vibration levels along the stretch of the Metro ROW proposed for the Elevated/At-Grade Alignment, Trench Option, and LPA are generated through freight rail operations, not light rail transit. Metro would install new and upgraded rail infrastructure, wherever physically feasible, where freight tracks would be relocated, which would help reduce existing freight vibration levels. The project would also include implementation of Mitigation Measure MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats, which would ensure potential operational vibration impacts are reduced to a less than significant level.

1958-4 The commenter generally mentions "well documented" studies regarding geological conditions. Although specific studies were not cited by the commenter, Metro has received comments from other submissions regarding the South Bay Galleria EIR and a Ninyo & Moore study. The South Bay Galleria EIR describes the same regional geologic conditions as those presented in the Draft EIR. The South Bay Galleria EIR also describes findings from a geotechnical report that is specific to the Galleria site. While the Galleria's geotechnical report findings would not apply to this project, they recommend similar design and construction methods to those Metro would implement, such as excavating poor soils and replacing them with engineered fill in accordance with building code requirements. Regarding the Ninyo & Moore study, the information on soil conditions is consistent with the types of soils identified in Section 3.8 of the Draft EIR, as well as with the 2023

Geotechnical Data Report, which supports the Draft EIR engineering plans and includes a review of past geotechnical investigations conducted within the project area.

Additionally, the soil types described by the commenter are generally consistent with Metro's understanding of existing conditions, as discussed in Section 3.8, Geology and Soils, of the Draft EIR. These soils are common throughout Los Angeles County and are not unique to the project area. There are no unstable or seismically hazardous conditions along the corridor that would preclude safe construction or operation of the project. See MR-13: Soil Stability and Sinkholes and responses to Comments 1958-2 and 1958-5.

1958-5 As described in Section 3.6, Noise and Vibration, of the Draft EIR, the FTA has defined vibration thresholds for human annoyance and structural damage. As shown in Table 3.6-6 of the Draft EIR, the threshold for vibration annoyance is 65 vibration decibels, for "frequent events." The threshold for construction vibration damage is shown in Table 3.6-5 of the Draft EIR, which expresses vibration in terms of peak particle velocity inches per second. The analysis in the Draft EIR evaluates construction vibration impacts based on these established thresholds. For operational vibration impacts, vibration impacts are assessed in terms of human annoyance, as building damage thresholds are much greater than annoyance thresholds and are typically limited to construction activities, which generate higher peak vibration levels than freight or light rail trains. See MR-7: Utility Relocation and Hazardous Materials Safety.

1958-6 The commenter's interpretation of the vibration data is inaccurate. Vibration levels were elevated at the El Nido Park measurement location for both northbound and southbound trains, indicating that the observed levels were not solely attributable to variations in train weight. For both loaded and unloaded trains, the highest vibration levels typically occurred with the passage of the locomotive, which is generally the heaviest part of the train.

As described on page 3.6-28 of the Draft EIR, the FTA general assessment methodology does not require vibration measurements. Vibration measurements were primarily conducted to collect samples of vibration generated by the existing freight train pass-bys and not as a requirement to prepare the analysis. As described on page 3.6-31 of the Draft EIR, where higher vibration propagation was predicted compared to the predicted vibration levels, adjustments were made to calibrate the model such that it reflected higher vibration levels in the vicinity of El Nido Park.

See response to Comment 1958-2 regarding vibration mitigation and vibration effects related to annoyance and damage during operations.

The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. However, the assertion that the Hawthorne Option is necessary to reduce impacts related to hazardous and hazardous materials to less than significant is mistaken. See MR-8: Light Rail and Freight Train Safety.

Submission 1967 Right of Say

1967-1 Metro is committed to integrating safety into all Metro rail operations, and all project components would be designed and operated in compliance with applicable federal, state,

and Metro safety standards, including those governing the transport of hazardous materials. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As noted in Section 3.11, Utilities and Service Systems, the project includes Project Feature PF-US-1: Utility Identification and Coordination, which requires Metro to confirm the locations of all underground utilities in advance of construction and to closely coordinate with pipeline operators to avoid conflicts and implement protection-in-place or relocation procedures consistent with modern safety standards. It is expected that pipeline relocations could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority. Regarding the potential for vibration-related impacts to underground pipelines, see MR-7: Utility Relocation and Hazardous Materials Safety.

Regarding the concern about petroleum tankers operating adjacent to light rail and residential communities, the project would not increase the frequency or type of freight traffic, including hazardous materials, which continues to be regulated by the FRA and the U.S. Department of Transportation under the Hazardous Materials Transportation Act, discussed in Section 3.9-1.1 of the Draft EIR. Freight service is an existing condition and is subject to federal safety standards regardless of the project.

The Elevated/At-Grade Alignment, Trench Option, and LPA are designed to safely accommodate light rail, freight rail, and necessary separation distances with the ROW, and informed by modern design standards for track layout, elevated structures, and emergency access. There is sufficient space for the proposed light rail and freight track within the Metro ROW. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings for the Hybrid/Locally Preferred Alternative, for more details. See also MR-8: Light Rail and Freight Train Safety.

1967-2 See response to Comment 1967-1.