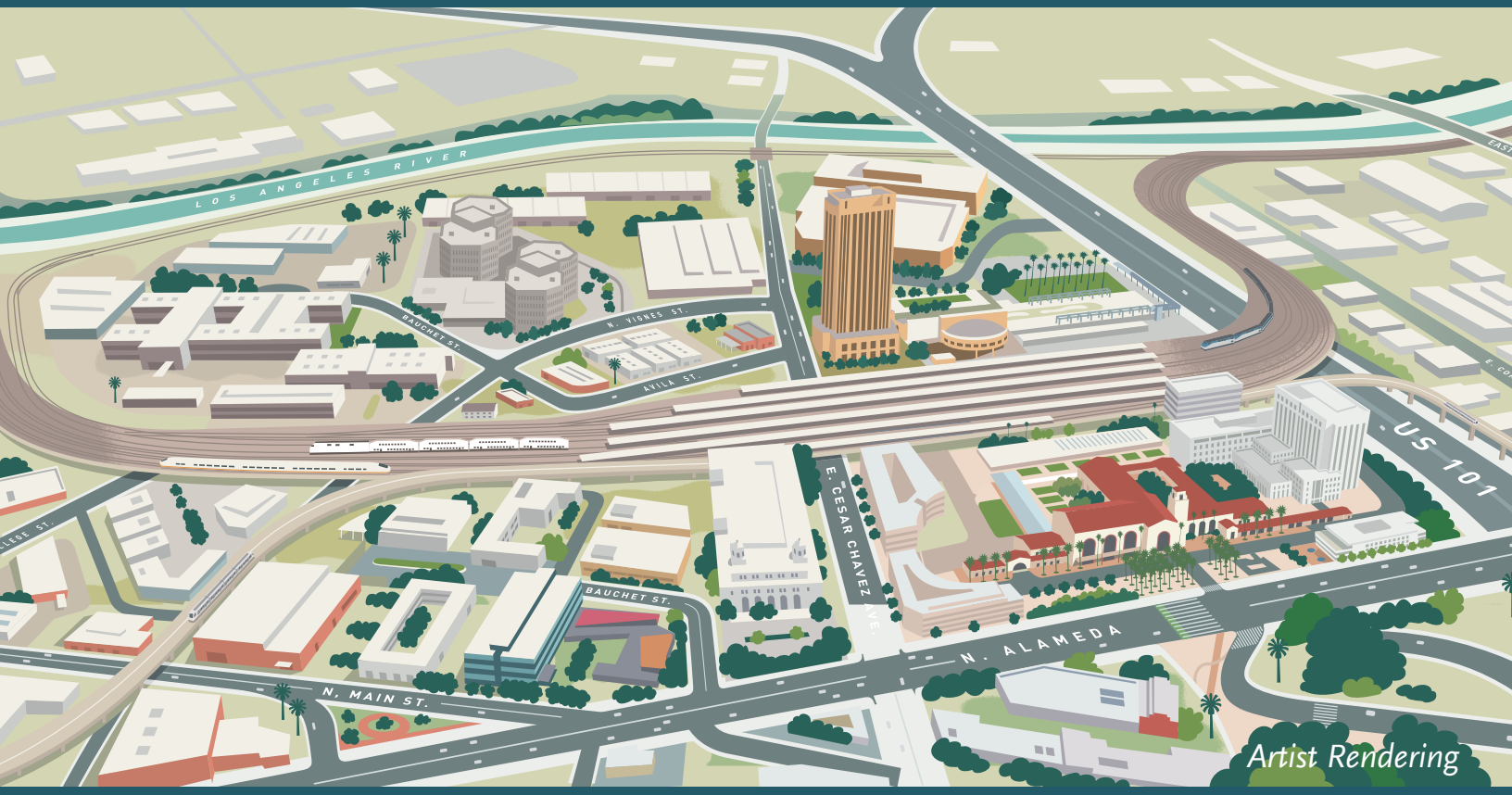
# Link Union Station

## Combined Final Environmental Impact Statement/ Record of Decision

### Volume III: Response to Comments

*January 2026*




The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by the State of California pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated July 23, 2019, renewed July 22, 2024 and executed by the Federal Railroad Administration and the State of California.

Metro

CALIFORNIA High-Speed Rail Authority

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# Link Union Station Project

# COMBINED FINAL ENVIRONMENTAL IMPACT STATEMENT/ RECORD OF DECISION

# VOLUME III: RESPONSE TO COMMENTS

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January 2026

The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being or have been carried out by the State of California pursuant to 23 U.S.C. 327 and a memorandum of understanding (MOU) dated July 23, 2019 (renewed July 22, 2024) and executed by the Federal Railroad Administration (FRA) and the State of California. Pursuant to the MOU, the California High-Speed Rail Authority is a federal lead agency for complying with the NEPA and other federal environmental laws for the Project. Prior to the July 23, 2019 MOU, the FRA was the federal lead agency. California High-Speed Rail Authority and Los Angeles County Metropolitan Transportation Authority, in their capacity as NEPA co-lead agencies, issue a single document that consists of the Combined Final Environmental Impact Statement and Record of Decision (Combined Final EIS/ROD). Pursuant to 49 U.S.C. 304a(b) and 23 U.S.C. 139(n)(2), a Combined Final EIS/ROD is to be issued unless California High-Speed Rail Authority determines that statutory criteria or practicability considerations preclude issuance of such a combined document.

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# Volume III: Response to Comments

# Table of Contents

**1.0 RESPONSE TO COMMENTS ..... 1**
1.1 INTRODUCTION ..... 1
1.2 KEY ISSUE RESPONSES ..... 2
1.2.1 Key Issue Response #1 – Stakeholder Engagement Activities in City of Vernon ..... 2
1.2.2 Key Issue Response #2 – Traffic Impact Analysis for Malabar Yard Railroad Improvements ..... 11
1.2.3 Key Issue Response #3 – Sensitive Receptors Considered and Localized Air Quality Analysis for Vehicle Idling ..... 28
1.2.4 Key Issue Response #4 – Public Safety Response Times and Emergency Vehicle Access ..... 33
1.2.5 Key Issue Response #5 – Operational and Physical Impacts to Businesses in Vernon ..... 36
1.2.6 Key Issue Response #6 – Land Use and Planning Analysis Related to 2023 Vernon Westside Zone Change and General Plan Amendment (adopted July 2023) ..... 39
1.3 LIST OF AGENCIES, ORGANIZATIONS, AND INDIVIDUALS THAT COMMENTED ON THE DRAFT EIS/SEIR ..... 49
1.4 BUILD ALTERNATIVE DESIGN OPTION ..... 56

**RESPONSES TO AGENCY COMMENTS ..... 1**

**RESPONSES TO ORGANIZATION COMMENTS ..... 1**

**RESPONSES TO INDIVIDUAL COMMENTS ..... 1**

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# 1.0 Response to Comments

## 1.1 Introduction

The Draft EIS/SEIR was distributed for public comment from June 21, 2024, through August 9, 2024, pursuant to the CEQ NEPA Implementing Regulations 1503 and CEQA Guidelines Section 15105. Comments were received in multiple formats throughout the 45-day public comment period and after the public comment period up to February 19, 2025. A total of 140 speaker cards, comments cards, email or online comments, and letters were received from 7 agencies, 9 organizations, and 123 individuals. Three emails from individuals with comments were received prior to the start of the Draft EIS/SEIR public comment period and five emails from individuals with comments were received after the close of the Draft EIS/SEIR public comment period, which were considered as well. Comments from Southern California Regional Rail Authority, serving as a NEPA Cooperating Agency, were also received after the close of the Draft EIS/SEIR public comment period and comments from the Housing Authority for the City of Los Angeles were also received after the close of the Draft EIS/SEIR public comment period. No comments were received from any tribes during the Draft EIS/SEIR public comment period. Agencies, organizations, and individuals that commented on the Draft EIS/SEIR are listed in Table 6 below (see Section 1.3).

- Applicable regulations pertinent to the responses to comments provided in Volume III of this EIS/SEIR are below: According to CEQ NEPA Implementing Regulations 40 CFR Part 1503.4, “an agency preparing a final EIS shall assess and consider comments both individually and collectively… stating its response in the final statement.”
- In accordance with Section 15088 of the State CEQA Guidelines, Metro is required to “evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response…to comments raising significant environmental issues received during the noticed comment period.”

As required by CEQA, any comments submitted on the Draft EIS/SEIR that address the Project or Project elements will be part of the overall record, which will be provided to decision makers for their review in their deliberations over whether to approve, disapprove, or modify the Project.

In accordance with CEQ NEPA Implementing Regulations and CEQA Guidelines Section 15132(d), the Final EIS includes responses to significant environmental points raised in the review and consultation process. Volume III of this EIS/SEIR provides responses to all written comments received during the public comment period, as well as oral comments received during the Draft EIS/SEIR public hearing held July 9, 2024.

Where applicable, responses also describe how the text, tables, or figures in the Draft EIS/SEIR were updated in the Final EIS based on the comments received, and/or provide background information on project development topics in response to questions and comments.

Ultimately, the public comments did not identify any new impacts, or substantially greater impacts than those disclosed in the Draft EIS/SEIR neither individually nor collectively.

## 1.2 Key Issue Responses

During the Draft EIS/SEIR public comment period, multiple comments were received that were similar in nature and expressed similar environmental concerns. In the case of a reoccurring comment that is raised three or more times, a "key issue response" is provided to avoid redundancy in responding to multiple comments on the same comment topic. Each reviewer is encouraged to review all key issue responses related to their comment topic and area of project interest and the other written responses to agencies, organizations, and individuals for further information.

The key issue responses are presented below:

- Key Issue Response #1 – Stakeholder Engagement Activities in City of Vernon
- Key Issue Response #2 – Traffic Impact Analysis for Malabar Yard Railroad Improvements
- Key Issue Response #3 – Sensitive Receptors Considered and Localized Air Quality Analysis for Vehicle Idling
- Key Issue Response #4 – Public Safety Response Times and Emergency Vehicle Access
- Key Issue Response #5 – Operational and Physical Impacts to Business
- Key Issue Response #6 – Land Use and Planning Analysis Related to *2023 Vernon Westside Zone Change and General Plan Amendment*

### 1.2.1 Key Issue Response #1 – Stakeholder Engagement Activities in City of Vernon

#### Description of Comment/Concern

During the 45-day comment period, multiple comments expressed concern that stakeholders and affected property owners were not informed about the proposed Malabar Yard railroad improvements and the environmental process associated with the Link US Project. The following key issue response was prepared to provide a comprehensive overview of Metro's stakeholder engagement activities in the City of Vernon throughout 2020, 2021, 2024, and 2025.

#### Technical Response

NEPA and CEQA regulations detail requirements for public involvement during preparation of an EIS/EIR to ensure meaningful engagement during the planning process and ensure decision makers are informed by the views of the public (40 CFR 1506.6, CEQA Guidelines Section 15201). CHSRA and Metro as the NEPA and CEQA lead agencies, respectively are committed to exceeding the public involvement and outreach requirements of CEQA and NEPA.

In 2020, prior to release of the Revised Notice of Intent (NOI), Metro worked closely with City of Vernon staff to coordinate all public involvement and stakeholder engagement activities as part of the environmental review process for the Malabar Yard railroad improvements. Metro engaged a wide variety of stakeholders including property owners and tenants of potentially affected parcels, the Vernon Chamber of Commerce, the Vernon Business and Industry Commission, City representatives, and property owners within a one-mile buffer of the Malabar Yard railroad improvements. Metro engaged with stakeholders that offer a variety of perspectives and local knowledge with the goal to gather and gain feedback from the community while providing a mechanism for two-way dialogue among the stakeholders, CHSRA, and Metro to share information about the Project and address questions and/or concerns early in the Project development phase.

As disclosed in Chapter 8.0, Public and Agency Outreach of the Final EIS and as summarized below, Metro implemented a wide range of formal and informal outreach methods such as in-person and virtual public meetings, business and property owner briefings, coordination meetings with City of Vernon staff, public presentations to the Vernon Business and Industry Commission, distribution of legal advertisements, email blasts, door to door visits to potentially affected properties1, phone calls to the businesses using publicly available information, Link US Project pamphlet distribution, and social media engagement. In addition, Metro facilitated a Vernon Business Stakeholder Meeting in 2021 at the recommendation of the Vernon Business and Industry Commission and Vernon Chamber of Commerce. These outreach activities demonstrate that Metro and CHSRA met and exceeded legal requirements regarding responsibilities to engage and meaningfully involve all affected communities in the public decision-making process.

A summary of Metro's stakeholder engagement activities performed in the City of Vernon throughout 2020, 2021, 2024, and 2025 is below. Stakeholder engagement activities in the City of Vernon were not conducted from April 2021 through April 2024 as Metro was dedicated to drafting environmental documents that were substantive and meaningful for public and stakeholder consideration and feedback. A list of stakeholder outreach meetings organized by date can be found in Chapter 8.0, Public and Agency Outreach of the Final EIS.

[1] The list of potentially affected properties was gathered by identifying properties that may be subject to partial or full property acquisition to implement proposed railroad improvements in addition to properties that may result in modified vehicular or truck ingress/egress.

## 2020 and 2021 - Summary of Stakeholder Engagement

### *Scoping Meeting Activities*

The 30-day public comment period for the Revised NOI extended from September 17, 2020 to October 19, 2020, and Metro hosted a Virtual Public Scoping Meeting on October 8, 2020. In addition to the Revised NOI being published in the Federal Register, Metro provided notice of the 30-day public comment period and Virtual Public Scoping Meeting as follows:

- In September and October 2020, Metro made in-person visits to engage with representatives of potentially affected properties and to obtain contact information.
- On September 22, 2020, Metro hand-delivered to owners of potentially affected properties notifications of the October 8, 2020 Virtual Public Scoping Meeting.
- On September 22, October 6, and October 8, 2020, Metro distributed flyers and e-blasts to notify individuals, organizations, and agencies on the stakeholder distribution list including property owners and tenants of potentially affected parcels, the Vernon Chamber of Commerce, the Vernon Business and Industry Commission, and City representatives of the Revised NOI and October 8, 2020, Virtual Public Scoping Meeting. After the Virtual Public Scoping Meeting, email blasts were also sent on October 12 and 16, 2020, to remind stakeholders of the 30-day public comment period.
- On September 29, 2020, Metro used the County of Los Angeles assessor parcel information to notify all owners of properties traversed by the Project footprint that Metro had released a Revised NOI and that Metro was holding a Virtual Public Scoping Meeting on October 8, 2020. Metro sent letters via Certified Mail to these property owners.
    - *Tri-Fold Pamphlet* - The letter contained a tri-fold pamphlet with general project information, a link to the project website and virtual meeting room, contact information, and Virtual Scoping Meeting information. This information was also translated into Spanish, Chinese (simplified), and Japanese. A Korean version of the tri-fold pamphlet was also made available on the project website and in the virtual meeting room.
- On September 18 and 30 and October 6, 8, 12, and 16, 2020, Metro posted on Facebook information regarding the Revised NOI and October 8, 2020 Virtual Public Scoping Meeting.
- Legal advertisements for the Revised NOI and Virtual Public Scoping Meeting were issued in 2020 in the following newspapers:
    - LA Times
    - LA Downtown News
    - La Opinión (Spanish)
    - Rafu Shimpo (Japanese)
    - Chinese LA Daily News (Chinese)

- Additional Stakeholder Engagement Activities
- On October 25, 2020, Metro distributed a tri-fold pamphlet to all property owners in the jurisdictional limits of Vernon and in the far northern portion of Huntington Park due to their proximity to the Malabar Yard railroad improvements.
- Metro facilitated a Vernon Business Stakeholder Meeting in February 2021 at the recommendation of the Business and Industry Commission and Vernon Chamber of Commerce. Metro provided notice of this meeting as follows:
  - Metro hand-delivered notifications to owners of potentially affected properties for the February 2021 Vernon Business Stakeholder Meeting
  - Four e-blasts were sent to notify individuals, organizations, and agencies on the stakeholder distribution list of the February 2021 Vernon Business Stakeholder Meeting (a total of 896 stakeholders)
  - Emails/phone calls were made to representatives of potentially affected property owners and business stakeholders to notify them of the proposed Malabar Yard railroad improvements and the Vernon Business Stakeholder Meeting in February 2021
- The following stakeholder engagement meetings were also held:
  - Agency Coordination Meetings with City of Vernon staff in 2020, 2021
  - Vernon Business and Industry Committee Meeting (2020, 2021, virtual)
  - 15 individual briefings with property owners, tenants, and representatives of multiple properties on the following dates:
    - **September 21, 2020:**
      - Dennis Roach representing 4811 Hampton Street – virtual meeting
      - Michael Melideo representing 4848 Santa Fe Avenue – virtual meeting
    - **October 5, 2020:**
      - Michelle Rojas representing 4900 Santa Fe Avenue – virtual meeting
      - Jacob Khobian and Jonathan Khodabaksh representing 4800-4824 Santa Fe Avenue – virtual meeting
    - **October 6, 2020:** John Rhee, Jessica Bagdanov, Richard Lucas, and Ignacio Crespo representing 4620 Seville Avenue – virtual meeting
    - **October 7, 2020:** Martin Barab representing 4535 Soto Street – virtual meeting
    - **November 6, 2020:** Allan Cooper and Ellia Thompson representing 2665 Leonis Boulevard – virtual meeting
    - **January 5, 2021:** Andre Roshan representing 2734 46th Street – virtual meeting

- **January 6, 2021:**
  - Veronica Salinas representing 4618 Pacific Boulevard – virtual meeting
  - Rick Pena representing 4585 Pacific Boulevard – virtual meeting
- **January 7, 2021:**
  - Dennis Berman representing 4550 Seville Avenue – virtual meeting
  - David Prince representing 4580 Pacific Boulevard – virtual meeting
- **January 11, 2021:** Allan Cooper and Ellia Thompson representing 2665 Leonis Boulevard – virtual meeting
- **January 27, 2021:** Michael Melideo representing 4848 Santa Fe Avenue – virtual meeting
- **January 28, 2021:** Jacob Khobian representing 4800-4824 Santa Fe Avenue – virtual meeting

## 2024 - Summary of Stakeholder Engagement

### *Draft EIS/SEIR Public Comment Period*

The 45-day public comment period for the Draft EIS/SEIR extended from June 21, 2024, through August 9, 2024, and Metro hosted an Open House/Public Hearing on July 9, 2024. In addition to the Draft EIS/SEIR being published in the Federal Register and on the State Clearinghouse, Metro provided notice of the 45-day public comment period and Open House/Public Hearing as follows:

- On June 26, 2024, hand-delivered notifications were distributed to owners of all potentially affected properties to notify them of the Draft EIS/SEIR public comment period and Open House/Public Hearing. Hand-delivered notifications were also distributed to potentially affected properties associated with the Build Alternative in the vicinity of LAUS to notify them of the Draft EIS/SEIR public comment period and Open House/Public Hearing
- Two e-blasts were sent to notify individuals, organizations, and agencies on the stakeholder distribution list to notify them of the Draft EIS/SEIR public comment period and Open House/Public Hearing (a total of 896 stakeholders)
- Three posts on the message board website NextDoor were shared linking to articles from The Source (English) and El Pasajero (Spanish), news blogs operated by Metro, to notify the public of the Draft EIS/SEIR public comment period and Open House/Public Hearing
- One Facebook event invite was shared regarding the Open House/Public Hearing
- Link US Project tri-fold mailers (approximately 5,000) were distributed to owners of properties within 1-mile radius of the Malabar Yard railroad improvements prior to the Draft EIS/SEIR public review period and Open House/Public Hearing

- A Project Update was presented to the City of Vernon Business and Industry Commission on May 9, 2024 (virtual) to notify them of the Draft EIS/SEIR public comment period and Open House/Public Hearing
- A Project Update was presented to the City of Vernon staff on May 23, 2024 (virtual) to notify them of the Draft EIS/SEIR public comment period and Open House/Public Hearing
- Legal advertisements for the release of the Draft EIS/SEIR and Open House/Public Hearing were issued in 2024 in the following newspapers:
    - LA Times
    - La Opinión (Spanish)
    - Rafu Shimpo (Japanese)
    - Chinese LA Daily News (Chinese)

***Stakeholder Engagement After Draft EIS/SEIR Public Comment Period***

After the Draft EIS/SEIR public comment period, based on comments received from the City of Vernon and community members and property owners in the City of Vernon, additional agency consultation and stakeholder engagement activities were conducted with the City staff, potentially affected property owners and tenants, and other community members to discuss various aspects of the Malabar Yard railroad improvements and to address concerns and comments raised during the public comment period related to the Malabar Yard railroad improvements.

After the Draft EIS/SEIR public comment period, Metro conducted eleven meetings with the City of Vernon to address comments raised during the Draft EIS/SEIR public comment period, comments raised by the Vernon Chamber of Commerce, and comments raised by affected property owners and tenants, and other community members. During each of the meetings with City staff, an emphasis was placed on the alternatives analysis process for the Malabar Yard railroad improvements, reduced train movements that would result in the City from the consolidated freight railroad operations, how fewer train movements on the Harbor Subdivision (parallel with Santa Fe Avenue) would improve citywide circulation, complement the City's initiatives outlined in the *2023 Vernon Westside Zone Change and General Plan Amendment*, enable quicker emergency response throughout the city, methods to minimize potential impacts on business operations, and community improvements that would further offset potential effects in the City. During these meetings, Metro presented Project-related information and analysis in PowerPoint format to address the City's key concerns. Following each meeting, a meeting summary, including action items was prepared and submitted to the City of Vernon for review and concurrence.

Metro's coordination activities with the City of Vernon led to the identification of multiple community improvements that would further support the City's development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. The community improvements are incorporated in the Final EIS as Offsetting Mitigation Measures (OMMs) because they would

complement existing mitigation measures, further limit or compensate for potential impacts disclosed in the Draft EIS/SEIR that were raised by members of the public during the 45-day public comment period, support the City's planning initiatives, and provide benefits to the local community at large. The OMMs are described below:

- OMM MY SS-1. Train Detection Cameras – New train detection cameras would be installed at four existing at-grade crossings at 37th Street, 38th Street, Vernon Avenue, and Pacific Boulevard.
- OMM MY SS-2. Mobile Emergency Operations Center (EOC) – Metro would provide funding for a new Mobile EOC to provide the City of Vernon with redundancy in its emergency management system. It would serve as a backup or field EOC during large scale events or natural disasters.
- OMM MY SS-3. Communications and Radio-Systems Upgrade – Upgrades to communication and radio systems would improve coordination and response among different departments and agencies, such as the police department, public utilities department, public works department, and the LA County fire department, which serves the City of Vernon.
- OMM MY NV-1. Quiet Zone Design and Physical Infrastructure – New safety infrastructure to support a future Quiet Zone, where train horns would not be routinely sounded, would be designed and installed at five grade crossing locations: 37th Street, 38th Street, Vernon Avenue, Pacific Boulevard, and 49th Street.
- OMM MY NV-2. Quiet Zone Technical Support – Associated with OMM MY NV-1, Metro, BNSF and the City of Vernon will enter into an agreement for Metro to provide technical support and help the City of Vernon to complete the regulatory process for a Quiet Zone designation along the Harbor Subdivision.
- OMM MY TR-7. High Visibility Crosswalk, Mid-Block Location – A high visibility crosswalk would be installed at Santa Fe Avenue near the Vernon City Elementary School and the Holy Angels Catholic Church of the Deaf.
- OMM MY TR-8. High Visibility Intersection Crosswalk Improvements with Cool Street Paving – new high visibility crosswalk improvements would be implemented at the intersections of Santa Fe Avenue with 37th Street, 38th Street, Vernon Avenue, Pacific Boulevard, and Fruitland Avenue, and at the intersections of 46th Street with Pacific Boulevard and Seville Avenue.
- OMM MY TR-9. Bus Shelters – new bus shelters would be installed at 25 locations throughout the city.
- OMM MY TR-10. Pan/Tilt/Zoom (PTZ) Smart Cameras, Software, and Screens for Traffic Monitoring – Metro would provide funding for new PTZ cameras at five intersections (Downey Road at Bandini Boulevard, 25th Street at Santa Fe Avenue, Fruitland Avenue at Malabar Street, Vernon Avenue at Santa Fe Avenue, and Pacific Boulevard at Santa Fe Avenue).

- OMM MY TR-11. AI-Based Traffic Control System (Traffic System Upgrades) – Metro would provide funding for 47 new traffic controllers and associated software to enable signal controls to adapt to real time traffic conditions, improving traffic circulation and safety for the community, particularly at the 46th Street and Seville Avenue, where queueing is expected to occur.
- OMM MY TR-12. Metro Transit Oriented Communities Program Support – Metro would provide the City with support under the Metro Transit Oriented Communities (TOC) Program. Metro would provide the City with grant writing assistance, technical assistance for land use feasibility/planning studies, joint development projects, and development of first/last mile strategies from Metro transit stops to proposed development sites identified in the *2023 Vernon Westside Zone Change and General Plan Amendment*.

These community improvements are discussed in detail in Section 3.16 and Appendix G of the Final EIS Appendix Q, Environmental Evaluation of Malabar Yard Mitigation. Metro also conducted three meetings with representatives of County of Los Angeles Supervisor (District 4) and Metro Board of Directors Chair, Janice Hahn's office on January 7, 2025, April 7, 2025, and May 15, 2025 to provide an overview of the Link US Project and Malabar Yard railroad improvements, alternative sites considered, and a progress update on Metro's meetings held with affected property owners and tenants and other community members after the close of the Draft EIS/SEIR public comment period.

Metro also conducted meetings with the Vernon Chamber of Commerce, individual property owners and/or tenants potentially affected by the Malabar Yard railroad improvements, and other community members that provided comments on the Draft EIS/SEIR during the public comment period to address specific concerns, some of which were raised as formal comments during the Draft EIS/SEIR public comment period. Metro conducted these meetings on-site at each individual property, Vernon City Hall, or virtually. Between December 2024 and February 2025, Metro met with 10 of 11 property owners/tenants that would be directly impacted by the Malabar Yard railroad improvements and 3 additional property owners/tenants and/or representatives that are not directly impacted but provided comments on the Draft EIS/SEIR during the Draft EIS/SEIR public comment period. The 13 property owners, tenants, and representatives that Metro met with in-person or virtually from December 2024 to February 2025 are summarized below:

**December 18, 2024:**

1. Martin Barab (property owner of 4535 Soto Street) – in person meeting
2. Michelle Rojas, Vincet Bohanec, Corri Nicol (property owners of 4900 Santa Fe Avenue) – in person meeting
3. John Rhee (property owner of 4620 Seville Avenue) – virtual meeting

**January 9, 2025:**

4. Rick Pena (property owner of 4585 Pacific Boulevard) – in person meeting

5. Dennis Berman (property owner of 4550 Seville Avenue) – in person meeting

**January 14, 2025:**

6. Steven H. Florman (property owner of 4580 Pacific Boulevard) – in person meeting

**January 17, 2025:**

7. Barry MacNaughton, Allan Cooper, Chris Scocos (tenants and representatives for 2665 Leonis Boulevard) – virtual meeting

**January 24, 2025:**

8. Amy Gantvoort, Sara Fenton, Maren Gamboa (tenants of 2661 E 46th Street) – virtual meeting

**January 31, 2025:**

9. Jacob Khobian (property owner of 4800-4824 Santa Fe Avenue) – in person meeting
10. Holiday Park (property owner of 2725 E. 46th Street) – in person meeting

**February 3, 2025:**

11. Michael Melideo (property owner of 4848 Santa Fe Avenue) – in person meeting
12. Stephanie Sagheb (representative for 4811 Hampton Street present at in-person meeting with Michael Melideo)

    Also present during this meeting was Mr. Jack Klein representing the property owner and Ms. Marisa Olguin representing the Vernon Chamber of Commerce – both of which provided formal public comments during the 45-day public comment period. This meeting provided an opportunity for all meeting attendees to gather feedback on the draft responses to comments that would be presented in the Final EIS, updates on the progress of ongoing meetings being held with all affected property owners and the City, alternatives considered based on direction from County of Los Angeles Supervisor (District 4) and Metro Board of Directors Chair, Janice Hahn's office, benefits of reduced railroad operations throughout the City, and the methods to minimize property impacts resulting from the 49th Street Closure.

**February 17, 2025:**

13. Jose Guerra, Veronica Salinas, Walter Guerra (4618 Pacific Boulevard) – in person meeting

Metro also facilitated a Community Meeting/Open House in the City of Vernon on Wednesday, March 26, 2025, which was open to the general public, with widespread noticing completed. Metro welcomed 48 attendees at the event (38 of whom signed in). During the event, community members had an opportunity to visit stations providing details on the project and proposed Malabar Yard railroad improvements, an overview of the outreach and stakeholder engagement

meetings completed along with a timeline, train operations including reduced train frequencies that would occur, and meet with the project team to ask questions. Participants voiced concerns similar to those previously raised during the 45-day public comment period including concerns related to:

- Outreach in the City of Vernon
- Loss of businesses, potentially affecting business owner and employee livelihood
- Delayed emergency response times
- Pollution and decreased air quality
- Increased traffic congestion
- Increased train traffic and train activity impacts on work delays and quality of life for Vernon residents
- Why Malabar Yard was selected as the site for mitigation

### Conclusion

The robust stakeholder engagement activities and wide range of public notifications and outreach methods described above demonstrate that Metro has satisfied and exceeded the CEQA and NEPA requirements for publicizing the Project and seeking public comments regarding the Malabar Yard railroad improvements. Metro is committed to continuing the meaningful engagement with local stakeholders in Vernon during the environmental clearance, design, and construction phases of the Malabar Yard railroad improvements.

## 1.2.2 Key Issue Response #2 – Traffic Impact Analysis for Malabar Yard Railroad Improvements

### Description of Comment/Concern

During the 45-day public comment period, multiple comments were received related to the traffic analysis prepared for the Malabar Yard railroad improvements in the City of Vernon. Comments received were in regard to the timing of the traffic impact analysis and collection of traffic counts during the COVID-19 pandemic, the geographic area of traffic impact analysis performed and why intersections and roadways between Soto Street and the Los Angeles Junction were not considered in the analysis, and potential for queuing to cause LOS-related traffic impacts.

### Technical Response

The following key issue response provides a comprehensive overview of the following sub-topic areas that align with the comments/concerns raised during the 45-day public comment period:

1. Traffic impact analysis methodology including the approach taken to normalize the traffic counts collected during the COVID-19 pandemic
2. Localized level-of-service (LOS) analysis based on anticipated traffic redistribution

3. Traffic queuing that would occur at each of the at-grade railroad crossings studied

## COVID-19 Factor Methodology – Normalizing Traffic Counts to Pre-COVID Conditions

Traffic counts were conducted in August 2020 for the intersections and roadway segments used in the traffic analysis to characterize the existing conditions. However, due to the timing of when the Revised NOI was released (September 2020) and impact of the COVID-19 pandemic, the amount of traffic on the streets and intersections was lower than the normal (non-COVID-19) conditions due to "new quasi-normal" day to day activities and businesses operating under various restrictions, including shelter-in-place and complete business shutdowns. To ensure the credibility of baseline traffic conditions, on which future year conditions (post COVID-19) are based, the raw traffic count data that was collected in August 2020 was 'normalized' to the traffic levels which existed pre-COVID-19, before it was applied to the traffic analysis. This "COVID Factor" approach was used to estimate traffic conditions in 2020 without COVID-19.

The approach to normalize the traffic count data collected in August 2020 during the COVID-19 pandemic to the traffic levels that existed pre-COVID-19 is presented in Final EIS Appendix Q Section 3.3, Transportation, Page 3.3-4 and summarized below.

- The historical count data for the year 2015 were obtained from the City of Vernon. The counts obtained were turning movement counts at four study intersections.
- The historical count data were then converted to the year 2020 pre-COVID volumes by adding a 1 percent annual growth rate for a period of 5 years. The annual growth rate was recommended by the City of Vernon because the City develops annual growth rates based on the estimated future growth of traffic within the City limits.
- The historical counts were then compared with the raw counts data collected in August 2020 and the reduction in traffic due to the pandemic was calculated for each turning movement, which was then added to a total reduction for each intersection.
- The average reduction in traffic due to the pandemic was 40 percent during the AM peak hour and 35 percent during the PM peak hour.
- To increase the raw counts collected in August 2020 by 40 percent in the AM peak hour and by 35 percent in the PM peak hour, a COVID factor was developed to normalize the counts data to align them with a reasonable estimate of what the 2020 counts would have been, without COVID, based on pre-COVID traffic levels.
- The COVID factors developed for the AM peak hour was 1.67 and for the PM peak hour was 1.54. Therefore, the counts in the AM peak hour were increased by a COVID factor of 1.67 and the counts in the PM peak hour were increased by a COVID factor of 1.54.

The above-referenced methodology is an industry-standard approach taken during the COVID-19 pandemic and was coordinated with the City of Vernon to obtain feedback on the approach before using the adjusted volumes in the traffic analysis. The traffic volumes presented in Appendix Q

represent the baseline condition at the time the environmental evaluation commenced and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes.

## Localized LOS Analysis Based on Traffic Redistribution

As discussed in Final EIS Appendix Q Section 3.3, Page 3.3-3, the geographic area considered to determine potential traffic-related effects is the traffic study area. The traffic study area does not include intersections or roadway segments between Soto Street and the Los Angeles Junction because the Malabar Yard railroad improvements would not generate new traffic trips once the Project is operational; however, it would result in localized redistribution of existing traffic (Final EIS Appendix Q Section 3.3, Page 3.3-8). The anticipated change in traffic behavior throughout operations is described below and shown on Figures 1 and 2.

- **49th Street Closure** – The proposed closure of the existing at-grade railroad crossing at 49th Street would result in restriction to through traffic along 49th Street, between Pacific Boulevard and Santa Fe Avenue. Drivers travelling to properties located on either side of the railroad crossing would have to go around the closed crossing by using Pacific Boulevard, Santa Fe Avenue and Fruitland Avenue to access properties located to the west and east sides of the railroad crossing, respectively. The modified westbound traffic movement using Fruitland Avenue is shown on Figure 1 and the modified eastbound traffic using Pacific Boulevard and Fruitland Avenue is shown on Figure 2. As shown on Figure 1 and 2 below, drivers could reroute around this closure easily, and the traffic conditions on the new routes they would use could accommodate those additional vehicles without significant additional delays. Therefore, the redistribution of the traffic would be limited to Sante Fe Avenue, Pacific Boulevard and Fruitland Avenue and would not change the traffic patterns outside these roadways.
- **46th Street Connector** – A portion of the 46th Street Connector is proposed within the existing road right-of-way that would be shared with vehicular traffic between Pacific Boulevard and Soto Street. The 46th Street Connector is anticipated to redistribute 50 percent of the east/west through traffic from 46th Street to other adjacent streets once the off-site improvements, including traffic and railroad signal installation, center median installation, and curb striping, are in place. This change in traffic patterns is attributed to the trains traveling through and stopping which may result in normal vehicular traffic flow being impeded. The 50 percent redistribution is a conservative estimate to determine potential impacts on the adjacent streets. The re-modified traffic movements due to the 46th Street Connector are shown on Figure 3.

*Figure 1. Project-Related Redistribution of Traffic - Modified Westbound 49th Street Traffic Movement*

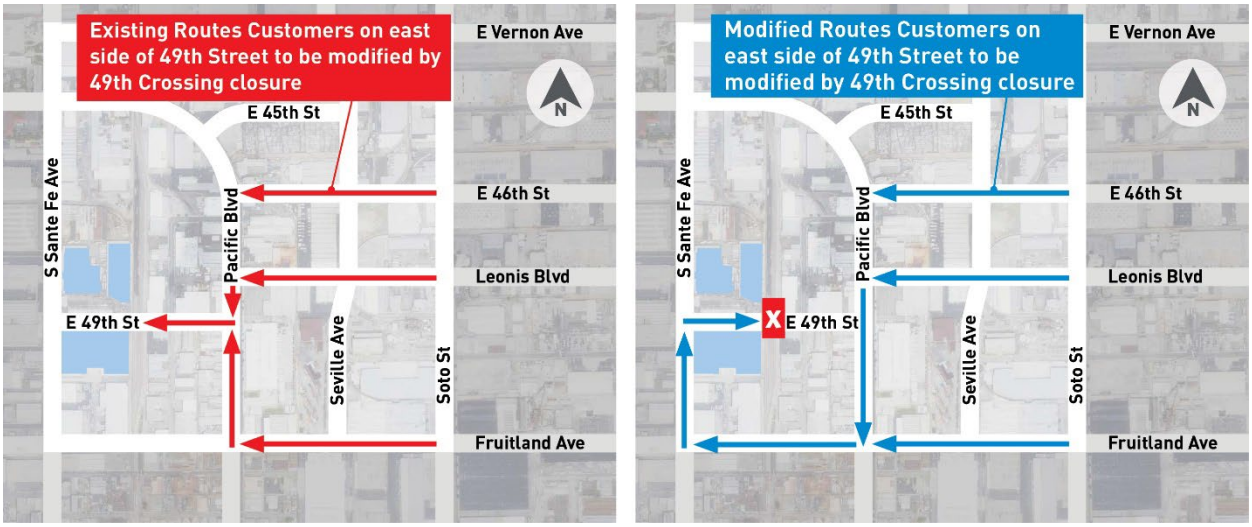



*Figure 2. Project-Related Redistribution of Traffic - Modified Eastbound 49th Street Traffic Movement*

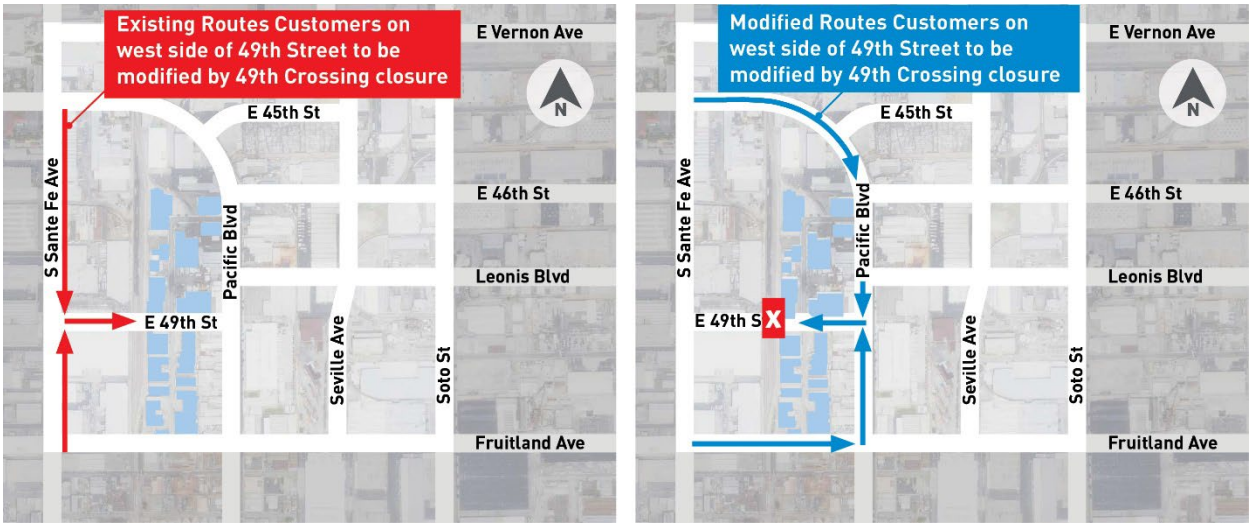
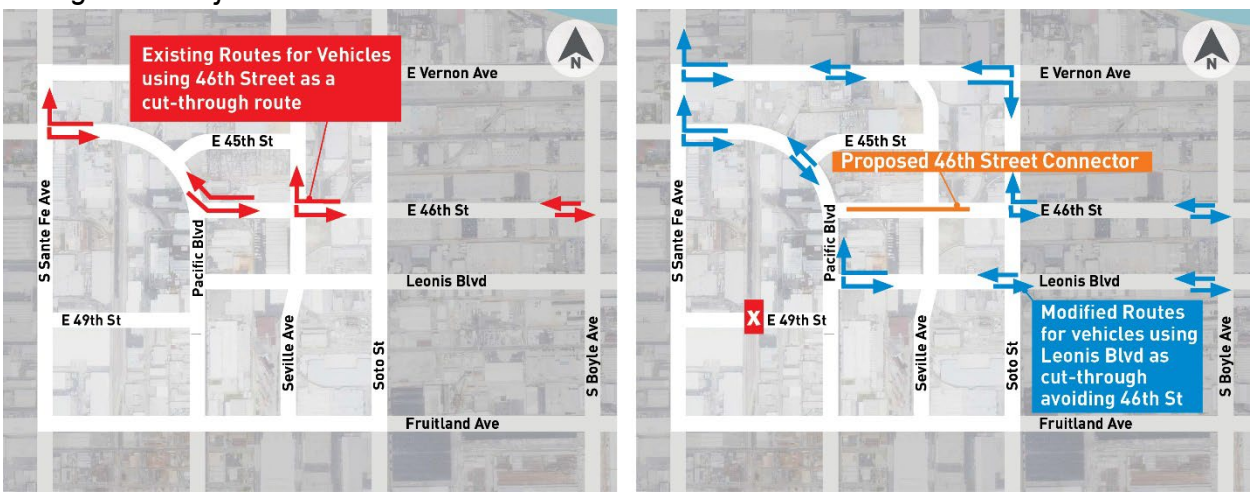


*Figure 3. Project-Related Redistribution of Traffic - Modified 46th Street Traffic Movement*




Due to the Project-related redistribution of existing traffic, a localized traffic analysis was conducted for intersections and roadway segments within the proximity to the Malabar Yard railroad improvements where traffic redistribution is expected to occur. This redistribution of traffic is expected during the Project Opening Year 2024, Construction Year 2024 and Future Horizon Year 2040. The anticipated traffic redistribution and change in traffic along with the list of study intersections and roadway segments patterns was coordinated with the City of Vernon to obtain feedback on the approach before the traffic analysis was performed.

Based on the traffic analysis results, the vehicle to capacity ratio (v/c ratio) threshold would be exceeded at three intersections and one roadway segment; thereby causing an adverse effect. According to guidelines from the *County of Los Angeles Traffic Impact Analysis Report Guidelines*, for intersections, the CEQA-based impact or NEPA-based effect is considered significant or adverse if the project-related increase in the v/c ratio equals or exceeds the thresholds shown in Table 1.

**Table 1. Significance Transportation Impact Criteria for Intersections**

| Non-Project LOS | Non-Project V/C | Project V/C Increase |
|---|---|---|
| C | 0.71 to 0.80 | 0.04 or more |
| D | 0.81 to 0.90 | 0.02 or more |
| E/F | 0.91 or more | 0.01 or more |

***Source: County of Los Angeles Traffic Impact Analysis Report Guidelines, January 1997***

Based on the impacts identified, Malabar Yard Mitigation Measures TR-1 through TR-5 are required to avoid or minimize potential adverse effects on transportation through the preparation of a construction traffic management plan, intersection restriping, and the addition of new lanes. These measures would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. This conclusion that traffic conditions would be maintained

or improved upon construction and operation of the Malabar Yard railroad improvements is presented in Draft EIS/SEIR Appendix Q Section 3.3, Pages 3.3-35 through 3.3-42 and summarized below:

1. Vernon Avenue/Santa Fe Avenue – Construction
    - With Malabar Yard Mitigation Measures TR-1 and TR-2, the v/c ratio threshold would be maintained.
2. Santa Fe Avenue/Pacific Boulevard – Construction and 2024
    - With Malabar Yard Mitigation Measures TR-1 and TR-3, the v/c ratio threshold would be maintained (Construction) and improved (2024).
3. Pacific Boulevard/Fruitland Avenue – 2040
    - With Malabar Yard Mitigation Measure TR-4, the v/c ratio threshold would be improved.
4. Fruitland Avenue between Santa Fe Avenue and Pacific Boulevard – 2040
    - With Malabar Yard Mitigation Measure TR-5, the level of service on Fruitland Avenue would be a “B” or better (reasonably unimpeded).

Upon implementation of Malabar Yard Mitigation Measures TR-1 through TR-5, the Malabar Yard railroad improvements would not cause any intersection delays that could exceed the v/c ratio significance threshold. None of the intersections and roadway segments outside the study area would have any change in traffic behavior due to the Malabar Yard railroad improvements. No further traffic analysis outside of the study area is warranted.

## Queuing Analysis

A queuing analysis is typically not prepared to support CEQA/NEPA documentation because queuing is not typically used as a metric to determine if a significant impact/adverse effect would occur related to traffic delay or LOS. However, as disclosed in Final EIS Appendix Q, in response to the feedback received from the City of Vernon staff, property owners, and business stakeholders, a queuing analysis was conducted at six at-grade crossings to determine if the redistribution of traffic from throughout operation of the Malabar Yard railroad improvements would result in any major increase in queue formation at these crossings when the crossing is closed to traffic to safely allow trains to pass through intersections. The queuing analysis was conducted as an addition to the LOS analysis to address the concerns raised by private property owners regarding queuing, access, and safety in the vicinity of their properties and to determine if the increase of vehicular queuing would exceed the volume of cars that the existing travel lanes could accommodate while trains pass through the intersection (travel lane storage capacity) at any of these crossings.

The queuing analysis was conducted for the following at-grade crossings:

- Railroad Crossing #1: At-Grade Crossing at 49th Street

- Railroad Crossing #2: At-Grade Crossing at Pacific Avenue/46th Street intersection
- Railroad Crossing #3: At-Grade Crossing on 46th Street east of Seville Avenue
- Railroad Crossing #4: At-Grade Crossing south of Seville Avenue and 46th Street
- Railroad Crossing #5: New At-Grade Crossing at Seville Avenue and 46th Street
- Railroad Crossing #6: At-Grade Crossing on Downey Road south of Vernon Avenue

**Train Operations Information, Affected Train Routes, Consolidated Freight Operations, and Reduced Train Frequencies/Time of Travel**

For the purposes of the traffic analysis performed for the Malabar Yard railroad improvements, existing and future train operations information was obtained from BNSF in 2020 and 2021 to support the analysis presented in the Draft EIS/SEIR and in 2024 to support responses to comments from the public and agencies after the close of the 45-day public comment period. Train operations information obtained from BNSF includes the number of existing and future trains per day on each of the affected train routes, the time of day trains move along each route, and length of trains to determine the duration a train takes to cross each at-grade crossing. Existing and future train operations information was used to support the environmental evaluation of the Malabar Yard railroad improvements in Appendix Q of the Final EIS and the information presented in this Key Issue Response #2, Key Issue Response #3 (Localized Air Quality Analysis for Vehicle Idling) and Key Issue Response #4 (Emergency Response). Appendix Q of the Final EIS (Section 2.2.1) was revised to reflect the most recent information received from BNSF in 2024.

In 2024, in response to operational information requested by the City of Vernon, BNSF informed Metro that one customer, Exxon, is currently being served by trains operating on the Harbor Subdivision and in the future, would be served by trains operating from Los Angeles Junction (2 daily train movements in the existing and future condition). BNSF also informed Metro that 2 daily train movements occur along the route between the existing spur line track located parallel to Seville Avenue/south of 46th Street to the Los Angeles Junction (East Seville) in the existing condition, and this frequency would not change in the future condition.

A summary of the information collected from BNSF, as it relates to the affected train routes, train lengths, consolidated freight operations, and reduced train frequencies is summarized below:

- *Affected Train Routes* – Existing and future train operations information was collected for the following five routes that extend through the City of Vernon (see Figure 4).
    - Hobart Yard/Malabar Yard Connection (Harbor Subdivision) – Trains operating to and from Hobart Yard and Malabar Yard on the portion of the Harbor Subdivision that extends north/south through Malabar Yard parallel to Santa Fe Avenue.
    - West Seville Connection – Trains operating on the existing spur line track located east of Pacific Boulevard/south of 46th Street. These trains utilize a portion of the Harbor Subdivision to enter the spur line tracks.

- Exxon Connection – Trains operating on the Harbor Subdivision between Malabar Yard and Exxon facility located north of 37th Street.
- East Seville Connection – Trains operating on the existing spur line track located parallel to Seville Avenue/south of 46th Street to the Los Angeles Junction.
- Hobart Yard/LAJ Connection – Trains operating on the tracks extending from Hobart Yard across the Los Angeles River to the Los Angeles Junction parallel to Downey Road.

Although the East Seville and Hobart Yard/LAJ Connection routes were considered in response to comments from the City of Vernon; no operational changes along these routes would be attributable to the proposed Malabar Yard railroad improvements. Therefore, train operations on these routes are not further considered in the responses to comments or environmental evaluation. Affected train routes resulting from the Malabar Yard railroad improvements include the Hobart Yard/Malabar Yard Connection (Harbor Subdivision), West Seville Connection, and the Exxon Connection (see Table 2 below). These are also depicted on Figure 4.

- *Train Lengths* – In 2024, BNSF informed Metro that train length on all routes considered are a maximum of 3,000 feet (existing and future condition). The Draft EIS/SEIR Appendix Q disclosed that trains operating between Hobart Yard and Malabar Yard along the Harbor Subdivision in the existing condition were estimated to be 1,250 feet long (Section 2.2.1) and trains operating on the 46th Street Connector could range from 2,000 feet to 4,000 feet. The Final EIS Appendix Q was updated based on information received from BNSF in 2024 indicating the train length on all routes considered are a maximum of 3,000 feet (existing and future condition).
- *Total Number of Rail Cars on 46th Street Connector* – Assuming a 3,000-foot train would operate on the 46th Street Connector (as discussed above), each train is expected to carry up to 45 cars. Based on the future Project-related train movements that would operate on the 46th Street Connector (4 daily train movements), up to 180 rail cars would move along the 46th Street Connector per day as a result of the Malabar Yard railroad improvements. Half of these rail cars would move during the day and half would move during the night (see Table 2 below).
- *Consolidated Freight Operations* – In the existing condition, BNSF customers in the City of Vernon are served from two locations, Malabar Yard and Los Angeles Junction (see Figure 5). Customers on the western portion of the city are served from Malabar Yard – these trains travel on the Hobart Yard/Malabar Yard Connection along a portion of the Harbor Subdivision parallel to Santa Fe Avenue. Customers on the eastern portion of the city are served from Los Angeles Junction – these trains travel on the Hobart Yard/LAJ Connection across the Los Angeles River to Los Angeles Junction parallel to Downey Road. The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from the Los Angeles Junction (see Figure 6). An additional corresponding benefit is that most of the "train building" activities that currently occur on city streets would be able to occur within

the Los Angeles Junction. As depicted on Figure 6, the 46th Street Connector would be in place, which serves as the critical connection for BNSF trains to operate through the city more efficiently.

- *Reduced Train Frequencies/Time of Travel* – The consolidated freight operations from Los Angeles Junction would reduce daily train movements on the Harbor Subdivision railroad tracks leading in and out of Malabar Yard because customers would be served from the Los Angeles Junction. Daily train movements on the Harbor Subdivision would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Table 2 below and Final EIS Appendix Q Chapter 2.0, Table 2-1). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent less train movements on the Harbor Subdivision coming from/to the San Bernardino Subdivision. As discussed above, train building activities on the Harbor Subdivision north of Malabar Yard would be substantially reduced.

  Train movements along the Exxon Connection, East Seville Connection, and Hobart Yard/LAJ Connection were not included in Draft EIS/SEIR Appendix Q Chapter 2.0, Table 2-1, Table 2-2, or Figure 2-2, as discussed above because no net increase in train moves per day would result along these routes.

  Table 2 below shows the total daily train movements for the affected train routes and the time of travel for trains operating on these routes in the existing and future condition. As shown in Table 2, the total frequency of train movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night. Figures 7 and 8 depict the existing and future daily train movements on the affected routes.

**Table 2. Total Daily Train Movements and Time of Travel (Existing and Future)**

| Train Route and Destination/Customer | Total daily train movements (weekday) | Time of Travel |
|---|---|---|
| ***Existing Train Movements (8 Total Movements/Day)*** | | |
| Hobart Yard to/from Malabar Yard | 4 | 2x Day: 6:30am – 2:00pm<br>2x Day: 7:30pm – 2:00am |
| Malabar Yard to/from West Seville | 2 | 1x Day: 6:30am – 2:00pm<br>1x Day: 7:30pm – 2:00am |
| Malabar Yard to/from Exxon | 2 | 1x Day: 6:30am – 2:00pm<br>1x Day: 7:30pm – 2:00am |
| ***Future Train Movements (4.85 Total Movements/Day)*** | | |
| Hobart Yard to/from Malabar Yard | 0.85 | 6x Week: 7:30pm – 2:00am |

| Table 2. Total Daily Train Movements and Time of Travel (Existing and Future) | | |
|---|---|---|
| **Train Route and Destination/Customer** | **Total daily train movements (weekday)** | **Time of Travel** |
| LAJ to West Seville (via 46th Street Connector) | 2 | 1x Day: 6:30am – 2:00pm<br>1x Day: 7:30pm – 2:00am |
| LAJ to Exxon (via 46th Street Connector) | 2 | 1x Day: 6:30am – 2:00pm<br>1x Day: 7:30pm – 2:00am |
| **Net Change (Existing and Future): Reduction of 3.15 Train Movements** | | |

*Figure 4. Affected Train Routes*

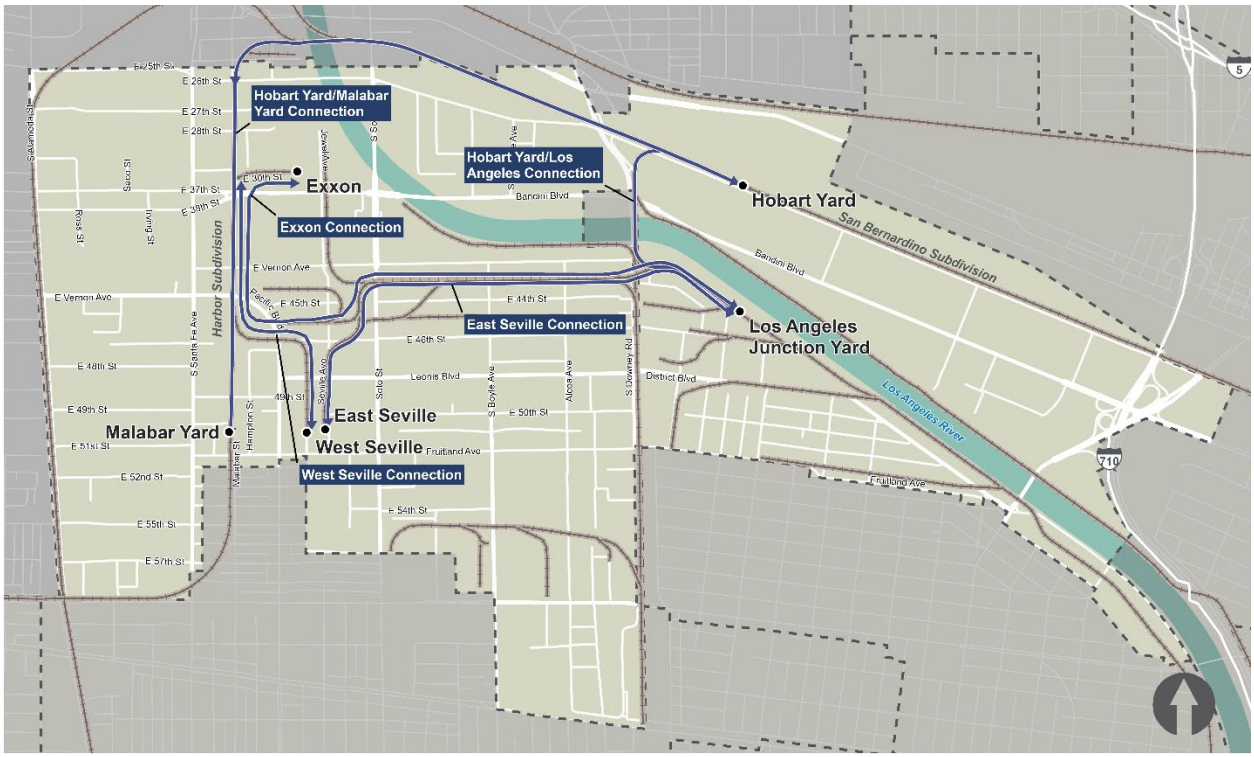


*Figure 5. Existing Freight Service in Vernon (From Hobart Yard and Los Angeles Junction)*

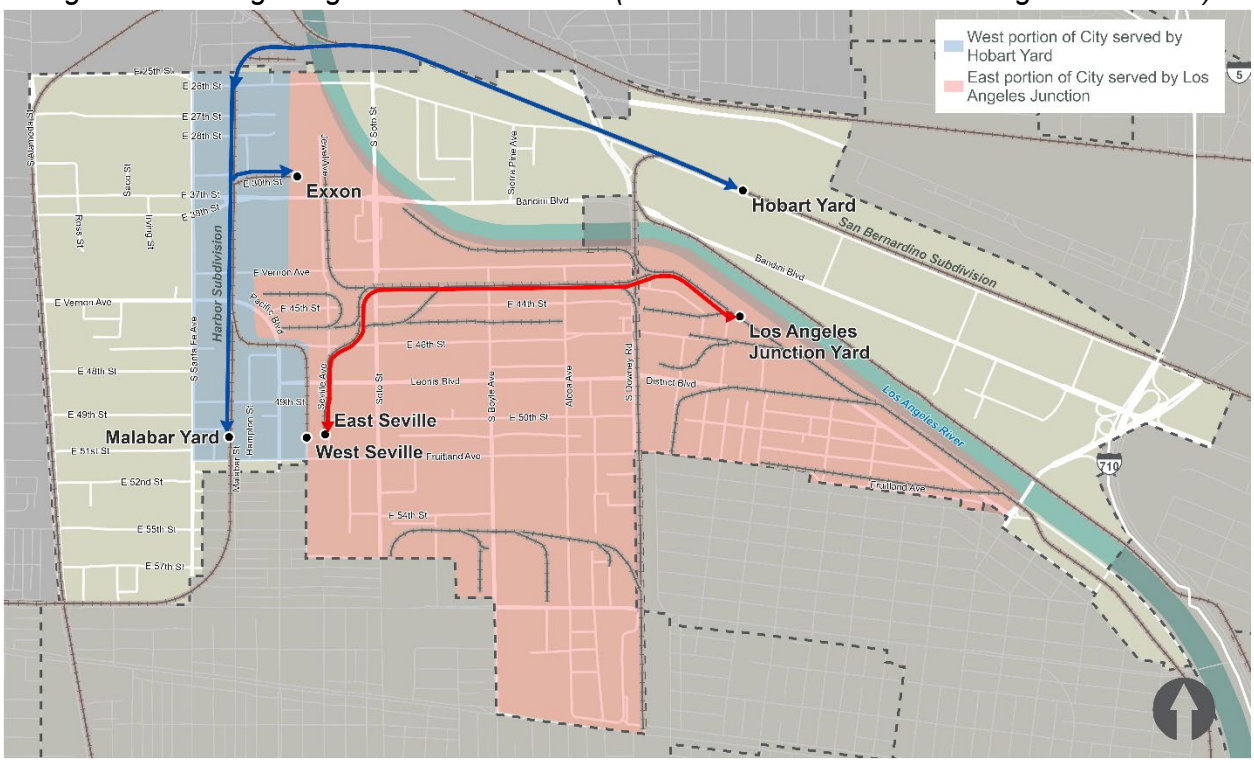



*Figure 6. Future Freight Service in Vernon (Consolidated from Los Angeles Junction)*

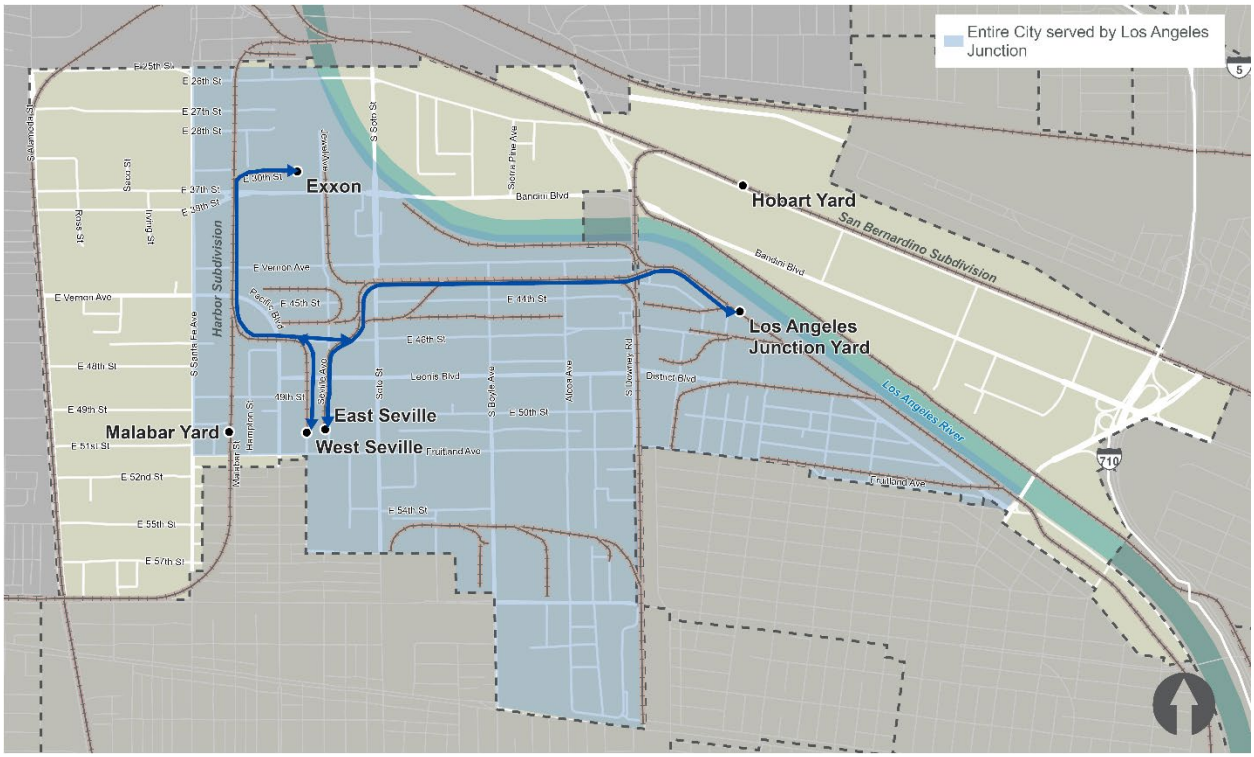


*Figure 7. Existing Rail Operations*

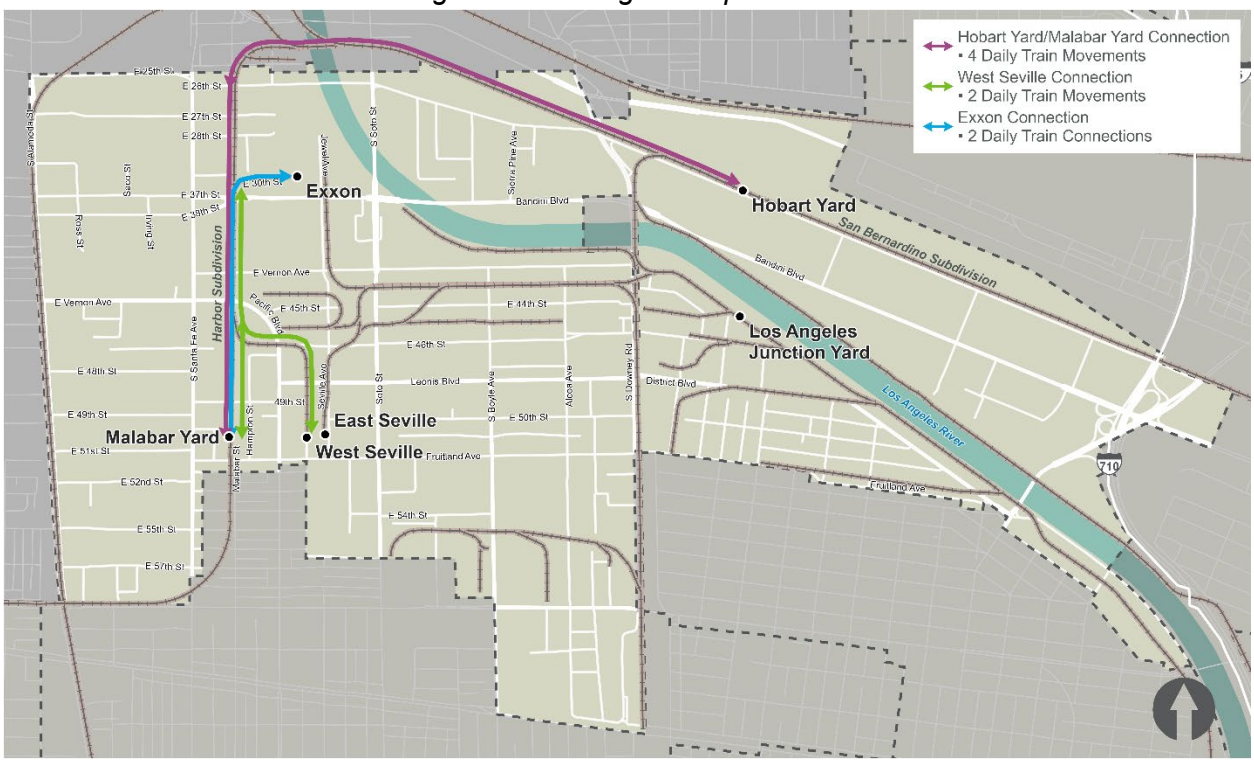
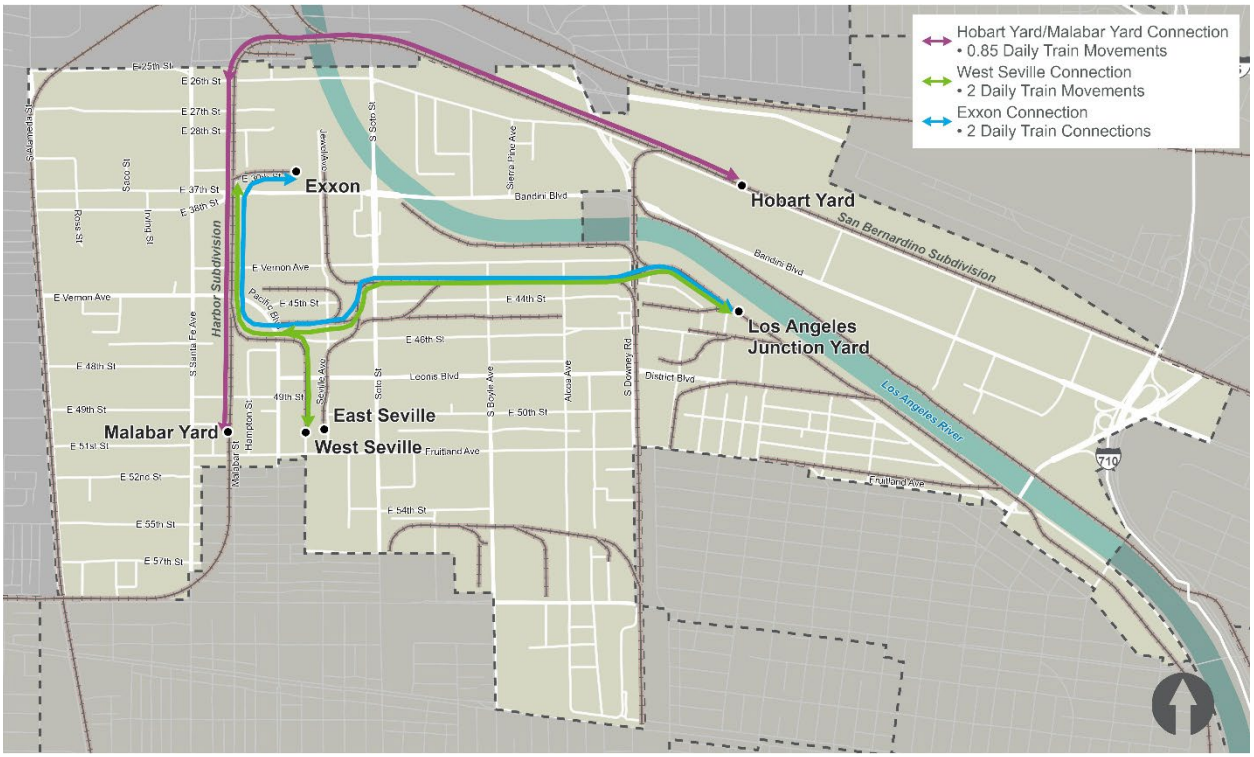



*Figure 8. Future Rail Operations*



***Summary of Queuing Results***

The train operations information above was used to prepare the queuing analysis to determine whether the existing travel lane storage capacity is adequate to accommodate the queue formations generated from redistributed traffic. The queuing results that support the conclusions in the Draft EIS/SEIR are shown in Table 3 below, and summarized as follows:

1. The queue formation at Existing Railroad Crossing #1 would be eliminated with the 49th Street Closure.
2. The queue formation at Existing Railroad Crossing #2 would not exceed the available storage lane capacity in the 2024 No Build scenario or the Opening Year (2024) scenario.
3. The queue formation at the Existing Railroad Crossing #3, #4 and #6 already exceeds the storage capacity in the Existing Condition (Final EIS Appendix Q Section 3.3, Table 3.3-10) and would continue to exceed the storage capacity in the 2024 No-Build scenario.

   For the Opening Year (2024), no increase to the queue formation at Existing Railroad Crossing #3, #4, and #6 would be attributable to the Malabar Yard railroad improvements since the increase in queue formation from the no build to the corresponding build conditions is zero with the exception of NBT movement at Railroad Crossing #4 where there is 20 feet of incremental addition to the existing queuing that already occurs. The increase in queue formation is not considered a substantial change for two main reasons: 1) the additional 20 feet of queue formation translates into less than a vehicle of queue since one vehicle queue is 25 feet; and 2) because the added queue can be adequately accommodated with the current configuration of the roadway and it would take only one cycle of phasing to clear out the additional 20 feet of incremental addition to the existing queuing that already occurs without the need for any further improvements in lane configuration.

4. The New Railroad Crossing #5 could cause southbound vehicular traffic to extend across 46th Street. While blocking an intersection is not a legal vehicular maneuver and queuing is not an LOS related traffic impact that constitutes a significant impact/adverse effect under CEQA/NEPA,[2] the increase in queue at this location may introduce a potential roadway hazard. Malabar Yard Mitigation Measure TR-6 minimizes the potential roadway hazard as effectively as possible; however, to establish the level of effectiveness for the mitigation measure, further coordination with CPUC and the City of Vernon is required during subsequent phases of design. Through the CPUC coordination and approval process, field diagnostics and additional roadway safety analysis are required to be conducted at each at-grade crossing location to maximize safety for vehicular and non-vehicular roadway users. Potential roadway safety devices that may be considered for future implementation (Malabar Yard Mitigation Measure TR-6) include queue cutter traffic signals or pre-signals for the new railroad crossing on Seville Avenue. These measures

[2] County of Los Angeles Department of Public Works Traffic Impact Analysis Report Guidelines

do not reduce the queue; however, would prevent vehicle queueing from occurring on the tracks that currently extend across Seville Avenue south of New Railroad Crossing #5.

**Table 3. Opening Year (2024) Condition Queuing Analysis Summary**

| No. | Railroad Crossing | Direction | Storage Lane Capacity (ft) | 2024 No Build | | 2024 Build | |
|---|---|---|---|---|---|---|---|
| | | | | AM (ft) | PM (ft) | AM (ft) | PM (ft) |
| 1 | At-Grade Crossing at 49th Street | EBT | 610 | 32 | 52 | — | — |
| | | WBT | 680 | 22 | 64 | — | — |
| 2 | At-Grade Crossing at Pacific Avenue/46th Street intersection | WBL | 500 | 37 | 119 | 24 | 68 |
| | | NBT | 600 | 587 | 555 | 582 | 559 |
| | | SBL | 90 | 77 | 80 | 43 | 43 |
| | | SBT | 1000 | 233 | 488 | 275 | 523 |
| 3 | At-Grade Crossing on 46th Street east of Seville Avenue | EBT | 135 | **187** | **189** | 105 | **187** |
| | | WBT | 400 | 123 | 314 | 88 | 123 |
| 4 | At-Grade Crossing S/O Seville Avenue and 46th Street | NBT | 400 | **471** | 192 | **491** | 186 |
| | | SBT | 150 | **164** | **495** | 4 | **414** |
| 5 | New At-Grade Crossing at Seville Avenue and 46th Street | NBT | 80 | — | — | **447** | 5 |
| | | SBT | 80 | — | — | **170** | **473** |
| 6 | At-Grade Crossing on Downey Road south of Vernon Avenue | NBT | 700 | **1,339** | **1,254** | **1,339** | **1,254** |
| | | SBT | 215 | **988** | **1,563** | **988** | **1,563** |

***Notes:***
***Bold indicates queue exceeds storage capacity***
***Ft=feet; EBT=eastbound through, NBT=northbound through, WBL=westbound left, SBT=southbound through***

### Summary of Intersection Blockage Analysis and Results

In March 2025, Metro facilitated a Community Meeting/Open House in the City of Vernon. Multiple comments were raised by the community regarding the duration of time that intersections could be blocked by freight trains. In response to these comments, in April 2025 Metro installed cameras at multiple locations throughout the City to record continuous train activity over the course of a week (April 19–25, 2025), 24-hours per day.

Applying the video footage collected, Metro performed an intersection delay/blockage analysis to document intersection delay/blockage which would occur in the existing condition and with implementation of the Malabar Yard railroad improvements. Metro presented the results of the

intersection delay/blockage analysis on June 17, 2025, to the Vernon City Council and on June 23, 2025, to the Vernon Chamber of Commerce. Multiple property owners and business representatives attended both meetings. The June 23, 2025, meeting with the Vernon Chamber of Commerce was facilitated by representatives of County of Los Angeles Supervisor (District 4) and Metro Board of Directors Chair, Janice Hahn's office.

Based on the video data collected, results were summarized for two conditions (Actual Condition [based on observed train activity] and Worst-Case Condition) to determine how the Malabar Yard railroad improvements would change intersection delay/blockage at eight locations and effects to citywide vehicular circulation. Results are summarized below:

1. Actual Condition (based on observed train activity)
    a. Length of Observed Trains: 350 feet to 1,500 feet
    b. Daily Intersection Blockage Results: With Malabar Yard railroad improvements, daily intersection delay/blockage would be reduced by 30 minutes, which results in a citywide circulation improvement.
2. Worst Case Condition
    a. Length of Longest Potential Trains: 3,000 feet
    b. Daily Intersection Blockage Results: If longer trains are needed due to customer demand in the City of Vernon, the corresponding reduction in daily intersection blockage with the Malabar Yard railroad improvements would also increase as compared to the existing condition. Assuming 3,000-foot trains would operate on any given day, daily intersection delay/blockage would be reduced by over 1 hour and 20 minutes, which results in a citywide circulation improvement. This reduction is based on the assumption that in the existing condition trains would operate with the same length (3,000 feet) without the Malabar Yard railroad improvements.

Based on the train observations conducted in April 2025, the data supports the conclusion that with implementation of the Malabar Yard railroad improvements, a citywide circulation improvement would occur. This is primarily because:

1. 3.15 fewer trains would operate in the City of Vernon, and
2. In the current condition, BNSF's "train building" activities occur on City streets north of Malabar Yard (Pacific Avenue), which triggers a substantial amount of time when railroad gates are down, delaying/blocking vehicular traffic. With the implementation of the Malabar Yard railroad improvements, most train building activities will be relocated to BNSF's Los Angeles Junction (LAJ) rail yard on the east side of the City.

*Figure 9. Intersection Blockages (Existing Condition)*

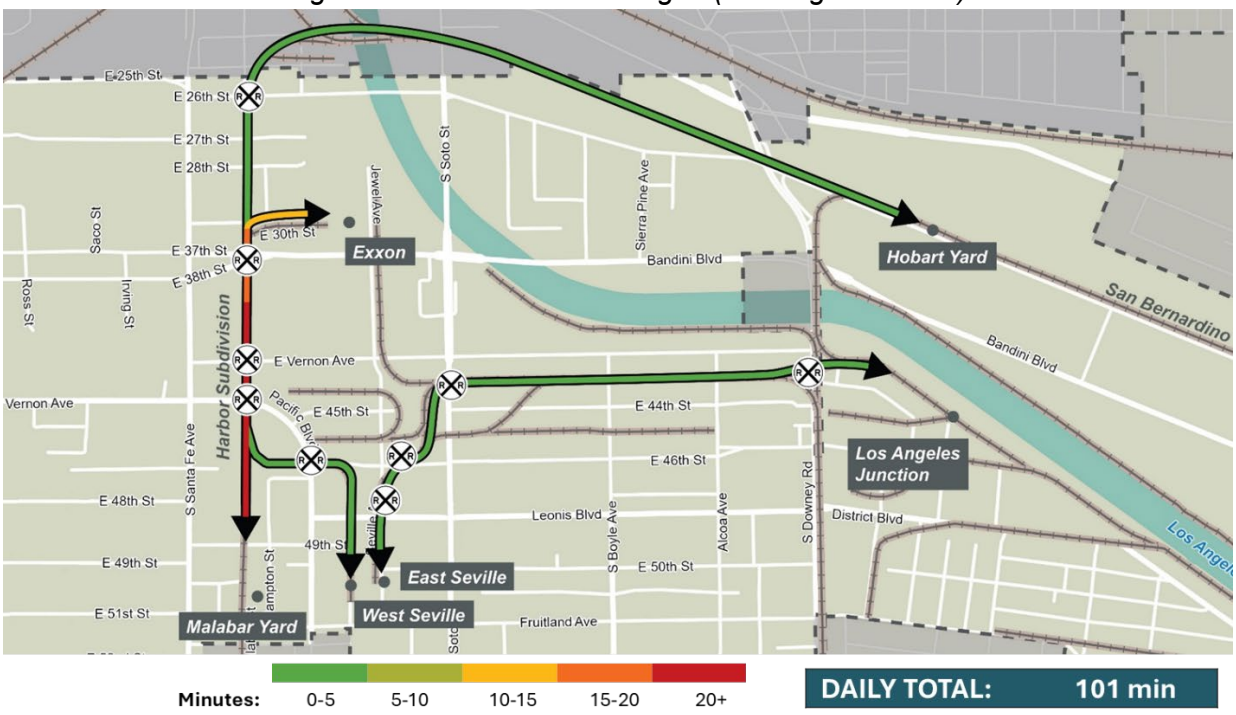



*Figure 10. Intersection Blockages (Proposed Condition)*

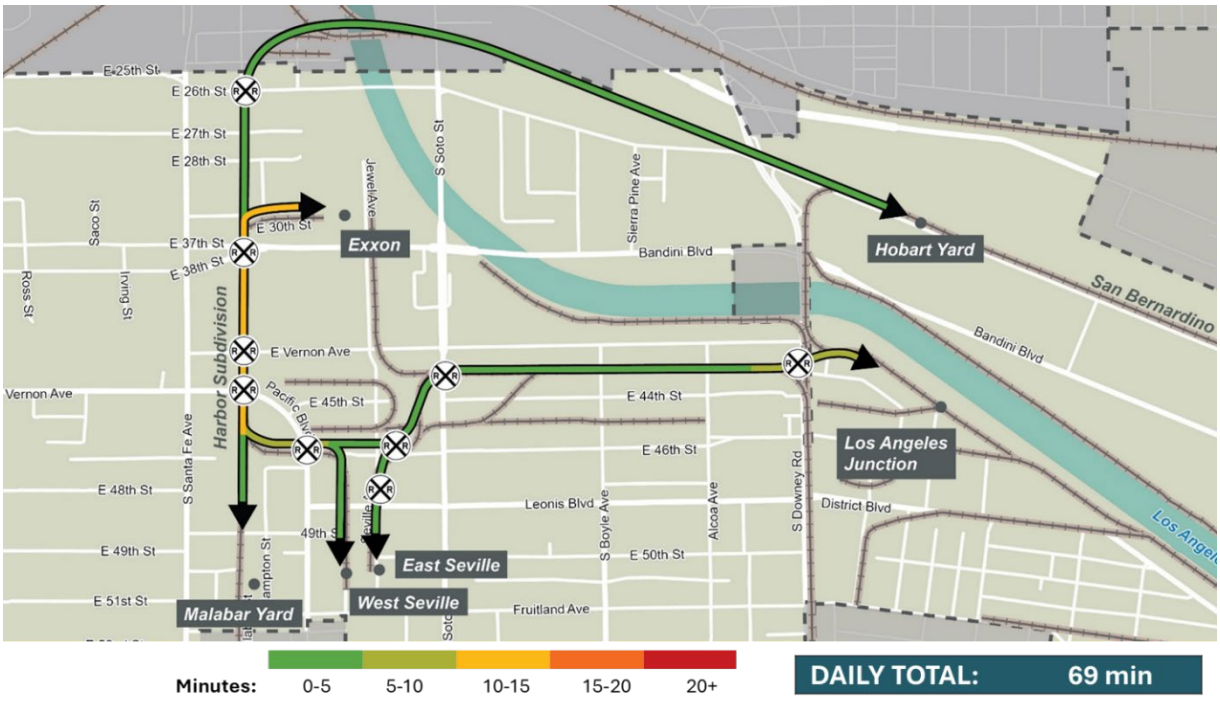
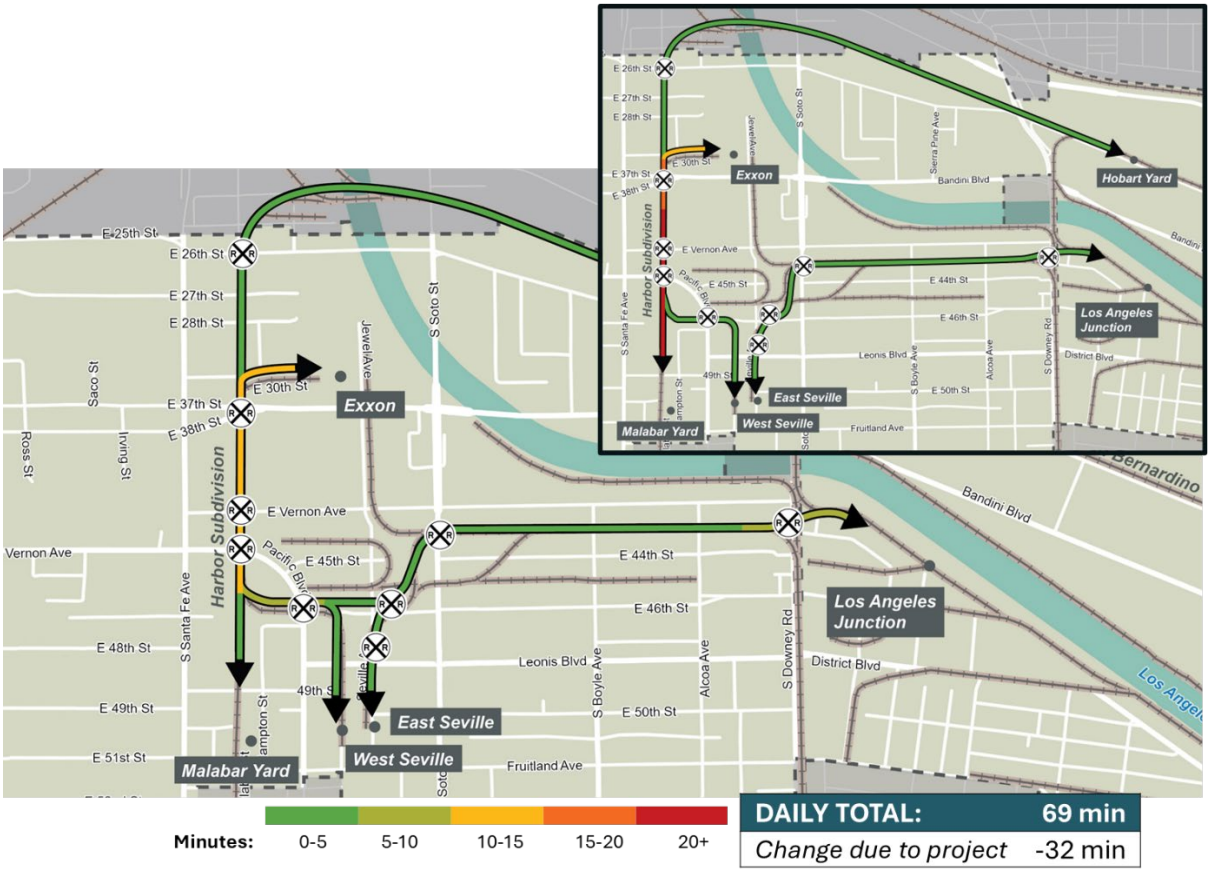


*Figure 11. Intersection Blockages (Change due to Malabar Yard Railroad Improvements)*




## Conclusion

Upon implementation of Malabar Yard Mitigation Measures TR-1 through TR-5, the Malabar Yard railroad improvements would not cause any intersection delays that could exceed the v/c ratio significance threshold. Based on the reduced train movements that would occur upon implementation of the Malabar Yard railroad improvements, a citywide circulation improvement would occur.

While queuing is not an LOS-related traffic impact that constitutes a significant impact/adverse effect under CEQA/NEPA, it is identified as a contributing factor to a potential roadway hazard at the intersection of Seville Avenue and 46th Street. Malabar Yard Mitigation Measure TR-6 minimizes the potential roadway hazard as effectively as possible; however, to establish the level of effectiveness for the mitigation measures, further coordination with CPUC and the City of Vernon is required during subsequent phases of design.

Based on the comments received during public review, the analysis provided in the Draft EIS/SEIR, and the clarification information provided above, there is no change to the traffic impact methodology, geographic area considered in the analysis, or the conclusions presented in the Draft EIS/SEIR. The public comments have identified no new adverse effects related to traffic.

## 1.2.3 Key Issue Response #3 – Sensitive Receptors Considered and Localized Air Quality Analysis for Vehicle Idling

### Description of Comment/Concern

During the 45-day public comment period, multiple comments were received related to a potential increase in vehicle idling emissions upon implementation of the Malabar Yard railroad improvements within the City of Vernon. The commenters were concerned that the Draft EIS/SEIR only included an analysis of regional project-wide emissions and provided no analysis of localized vehicle idling emissions in the City of Vernon.

### Technical Response

Idling emissions from vehicles occur when vehicles are on but not moving, such as when there is traffic delay or queuing on the roadway or at intersections. Idling presents a localized air quality issue, in the immediate vicinity of the idling vehicles. The Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. Ultimately, the traffic analysis shows minimal additional idling from implementation of the Malabar Yard railroad improvements. Therefore, any additional idling emissions would not cause a significant impact/adverse effect related to air quality. To support the technical response, the analysis requirements for CEQA and NEPA is summarized below to demonstrate why the analysis presented in the Draft EIS/SEIR is appropriate.

***NEPA Requirements*** – There are two sets of regulations to implement Clean Air Act (CAA) Section 176(c). The first set promulgated the Transportation Conformity regulations (40 CFR Part 51 and 93), applies to highway and mass transit projects. The second set of regulations promulgated the General Conformity regulations (40 CFR Parts 6, 51, and 93), applies to all other federal actions not covered under Transportation Conformity. Because the Project would receive federal funding and is in federal nonattainment for ozone and $PM_{2.5}$ and attainment/maintenance for $PM_{10}$ and CO, a conformity analysis applies.

1. Transportation Conformity – If transportation conformity applied, per the EPA's PM Hot-Spot Guidance and FHWA's Guidance on Mobile Source Air Toxic (MSAT) Analysis, this type of project would not qualify for quantitative dispersion modeling and therefore would not have the potential to result in significant localized emissions. The Malabar Yard railroad improvements would not cause high traffic volumes (140,000 AADT to 150,000 AADT or greater for any local roadway in the City of Vernon), would not be a new or expanded highway project with a significant number of diesel vehicles, and would not worsen traffic-related levels of service (LOS) with implementation of Malabar Yard Mitigation Measures TR-1 through TR-5. Therefore, the Malabar Yard railroad improvements would not fit any of the criteria necessary to require quantitative dispersion modeling.
2. General Conformity – The Project is subject to the General Conformity Rule under the Clean Air Act because the Project would receive federal funding and is in federal nonattainment for ozone and $PM_{2.5}$ and attainment/maintenance for $PM_{10}$ and CO.

40 CFR Part 93.153(b) Applicability states "a conformity determination is required for each criteria pollutant or precursor where the total of direct and indirect emissions of the criteria pollutant or precursor in a nonattainment or maintenance area caused by a Federal action would equal or exceed any of the rates in paragraphs (b)(1) or (2) of this section." As explained in Draft EIS/SEIR Appendix G (Air Quality and Global Climate Change Assessment), the Project's emissions are compared to the *de minimis* emissions levels. Final EIS Appendix G includes calculations for both construction and operational emissions at a regional level for the whole Link US Project (Build Alternative and Malabar Yard railroad improvements cumulatively). The *de minimis* levels serve as a threshold to determine if a project would cause significant air quality impacts.[3] Because the Project's emissions are below the *de minimis* levels with implementation of mitigation, no further analysis is required. Therefore, the Project satisfies general conformity requirements, and neither NEPA nor the CAA requires a localized air quality analysis.

***CEQA Requirements –*** The South Coast Air Basin is in state nonattainment for ozone, $PM_{2.5}$, and $PM_{10}$. At the state level, the air quality analysis must include whether sensitive receptors would be exposed to substantial pollutant concentrations (Appendix G of the CEQA Guidelines).

*Identification of Sensitive Receptors* – Based on South Coast Air Quality Management's (SCAQMD) definition, sensitive receptors are identified as locations where an individual could remain for 24 hours and includes land uses such as residences, schools, playgrounds and athletic facilities on school property, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes.

Although the Stacy Medical Center is a healthcare facility, it is not a long-term facility where patients or workers stay onsite overnight, therefore Stacy Medical Center is not considered a sensitive receptor.

The Holy Angels Church of the Deaf is not a sensitive receptor for air quality because churches are not classified as sensitive receptors under SCAQMD's definition. Additionally, the church is located at a greater distance from the Malabar Yard railroad improvements than the nearest sensitive receptor, which was determined to have no adverse emission impacts. Therefore, the Project would not result in adverse air quality impacts at the Holy Angels Church of the Deaf.

Factories do not qualify as sensitive receptors. Workers at commercial and industrial facilities are not included because these individuals do not remain onsite for 24 hours and because these individuals are not young children or chronically ill with a long exposure time.

The nearest sensitive receptors identified and considered in the air quality analysis for the Malabar Yard railroad improvements were:

[3] General Conformity Guidance: Questions and Answers, Office of Air Quality Planning and Standards, U.S. EPA 12 (July 13, 1994)

- Residences at 2415-2427 E 53rd St. (located approximately 1,325 feet [0.25 mile] south of the Malabar Yard railroad improvements),
- Vernon City School at 2360 East Vernon Avenue (located approximately 1,350 feet [0.25 mile] northwest of the Malabar Yard railroad improvements), and
- Residences on Furlong Place (located approximately 1,650 feet [0.31-mile] northwest of the Malabar Yard railroad improvements).

There are no childcare or daycare centers within a quarter mile of the Project footprint.

Applying a quarter-mile buffer to a project location is a typical industry standard approach to identify potentially sensitive receptors for project subject to CEQA. The quarter-mile buffer is a conservative estimate to determine where the highest pollutant concentrations are typically seen and where corresponding impacts could occur. Figure 3.5-1 depicts a quarter-mile buffer solely to depict the location of where the nearest sensitive receptors are located relative to the Project footprint.

LSTs were determined independent of the buffer shown in Figure 3.5-1. It is a coincidence that the nearest receptor is also .2509 miles away. Pollutant concentrations decline with increasing distance as demonstrated in multiple studies and guidance referenced in the section below. These studies demonstrate that the highest concentrations are typically seen within distances less than a quarter mile, which is why the map uses a quarter mile buffer to capture where the highest pollutant concentrations may occur.

- The EPA states, *"Research findings indicate that roadways generally influence air quality within a few hundred meters – about 500-600 feet downwind from the vicinity of heavily traveled roadways or along corridors with significant trucking traffic or rail activities."* (U.S. EPA 2014)
- The CARB Air Quality and Land Use Handbook states that, "*the distance between roadway and truck densities were key factors affecting the strength of the association with adverse health effects. Adverse health effects were seen within 1,000 feet and was strongest within 300 feet.*" (CARB 2005)

This demonstrates that the adverse air quality effects diminished with distance. Similarly, the Bay Area Air Quality District CEQA Air Quality Guidelines uses an overlay zone of at least 500 feet from all freeways and high volume roadways as a threshold of significance for local risks and hazards. Further academic research shows that pollutant concentrations level out to background levels after approximately 400 meters (1/4 mile) away from the source (Mishra & Shah, 2025). As shown in an academic study of ultrafine particles near a freeway by Yifang Zhu, et al. in Atmospheric Environment, both CO and black carbon concentrations as a function of the distance from freeway follow a decay curve. This curve levels out 300 meters away from the emission source (Zhu et al. 2002).

*Rail Operations Emissions Analysis:* As presented in Final EIS Appendix Q Section 3.5, Page 3.5-19, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street.

Fewer train movements on the Harbor Subdivision equates to less vehicle idling at each of the at-grade crossings where sensitive receptors, such as the Vernon City School and the residences on Furlong Place, are currently located and where additional sensitive receptors are planned in the future. These beneficial effects were clarified in the Final EIS Appendix Q Section 3.5, Pages 3.5-19 and 3.5-20. In addition, the reduction in emissions from reduced train movements would outweigh the minimal increase in vehicle idling emissions from any new queuing (Table 3).

*Localized Analysis for Pollutant Emissions*: General Conformity is the pollution prevention and control program that requires a federal agency to assure any proposed activity the agency proposes will conform to the purpose of applicable implementation plans and will not interfere with a State or Tribe's ability to attain and maintain the National Ambient Air Quality Standards (NAAQS) for air quality, as required under Clean Air Act (CAA) section 176(c).

The purpose of the General Conformity rule is to ensure that:

- federal activities do not cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS);
- actions do not worsen existing violations of the NAAQS; and·
- attainment of the NAAQS is not delayed.

As demonstrated in the Final EIS pages 3.5-26 to 3.5-34, Record of Non Applicability, and Appendix G of the Final EIS, the annual construction emissions and annual net change in operational emissions for all analysis years generated by the Build Alternative and Malabar Yard railroad improvements, as compared to the No Action Alternative, are below the general conformity *de minimis* levels for all years of analysis with implementation of mitigation. As such a formal general conformity determination with additional localized analyses are not required. The Build Alternative and Malabar Yard railroad improvements would not interfere with the state's plans to attain and maintain the NAAQS. A detailed $PM_{10}$ and $PM_{2.5}$ hot-spot analysis was not completed because FCAA and 40 CFR 93.116 requirements would be met without an explicit hot-spot analysis.

For CEQA, localized air quality impacts were evaluated using the localized significance threshold methodology from SCAQMD. This methodology sets a screening level threshold based on the pollutant ($NO_x$, CO, $PM_{10}$, $PM_{2.5}$) and the distance to the nearest air quality sensitive receptor in that source receptor area (location). On-site emissions are calculated and then compared to these thresholds. SCAQMD uses the localized significance threshold (LSTs) to evaluate if projects qualify to be screened out from the requirement to conduct project-specific dispersion modeling.

If required, the purpose of dispersion modeling is to demonstrate that a project would not delay attainment of ambient air standards. If a project's on-site emissions are below the LSTs, then no further analysis with dispersion modeling is required. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of an ambient air standard.

The *SCAQMD LST Methodology Guidelines (SCAQMD 2008)* state:

> *If the calculated emissions for the proposed construction or operational activities are below the LST emission levels found on the LST mass rate look-up tables and no potentially significant impacts are found to be associated with other environmental issues, then the proposed construction or operation activity is not significant air quality.*

The mass rate LSTs and associated look up tables provide a practical screening approach, allowing agencies to determine whether a project may generate significant localized air quality impacts without the need for dispersion modeling.

Localized Air Quality Project-Specific Inputs

The analysis in the Final EIS Appendix Q, Section 3.5 (Air Quality and Global Climate Change) estimates air pollutant emissions compared to the LSTs set by the distance to the nearest sensitive receptor, Project footprint, and location of the Project. It analyzed whether the emissions exceeded the SCAQMD LST thresholds established for the Malabar Yard railroad improvements, and it concluded the emissions did not. Therefore, the Malabar Yard railroad improvements would not cause an adverse effect to localized air quality. As shown in Appendix F of Final EIS Appendix Q, the localized air quality analysis uses the mass rate look up tables from SCAQMD to determine the appropriate LST for $NO_x$, CO, $PM_{10}$, and $PM_{2.5}$ based on the source receptor area, distance to nearest receptor, and Project footprint (SCAQMD 2009). The source receptor area used for the analysis is SRA 1 Central LA for the City of Vernon (SCAQMD n.d.). As specified in Appendix F of Final EIS Appendix Q, the nearest receptor (2415-2427 E 53rd St residences) is 403.8 meters away from the Project footprint, which is measured from the outermost boundary of the Project footprint for both design options considered to the receptor location. Since thresholds are provided in the mass rate look up tables for a distance to receptor of 200 meters and 500 meters, the threshold for the Malabar Yard railroad improvements was scaled using a linear interpolation between the two values to account for the nearest receptor location of 403.8 meters.

The Project footprint is approximately 4 acres, however the SCAQMD mass rate look up tables assume emissions for a 1-acre site, a 2-acre site, and a 5-acre site. Inspection of the mass rate LST look-up table shows that for the same source receptor area and distance to receptor, a smaller project site would have a lower LST. Analysis was prepared assuming a 2 acre site to yield a lower and more conservative pollutant threshold. Using these parameters, while maintaining consistency with the Localized Significance Threshold methodologies,

- the NOx threshold is set at 162 lb/day;
- the CO threshold is set at 6,834.5 lb/day;
- the PM10 threshold is set at 154.7 lb/day and

- the PM2.5 threshold is set at 83.7 lb/day.

Localized Air Quality Results

*Construction*

As stated in the Final EIS Section 3.5, Pages 3.5-25 and 3.5-32 and in the supporting calculations provided in Appendix F of the Final EIS Appendix Q, Environmental Evaluation of Malabar Yard Mitigation, pollutant emissions for $NO_x$, CO, $PM_{10}$, and $PM_{2.5}$ were below the appropriate LST for that pollutant in the screening process. Therefore, based on the SCAQMD LSTs methodology, a dispersion analysis was not warranted. As localized emissions did not exceed the LSTs for the nearest sensitive receptors identified that were considered in the air quality analysis, localized emissions on any additional sensitive receptors that are further in distance from the nearest receptor would be lower.

*Operation*

For operations, on-site operational emissions would decrease from existing conditions due to the reduction in train movements (3.15 fewer daily train movements). Therefore, the Malabar Yard railroad improvements would have a net negative contribution to localized operational emissions in the City of Vernon and the Malabar Yard railroad improvements would not result in an increase in localized emissions nor an exceedance of LSTs. Impacts on localized air quality during operations would not be significant and no further analysis is required. (Please refer to Appendix F of Final EIS Appendix Q, Section 3.5 (Air Quality and Global Climate Change), Page 3.5-19 and Page 3.5-20).

Implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street.

Fewer train movements on the Harbor Subdivision equates to less vehicle idling at each of the at-grade crossings where sensitive receptors, such as the Vernon City School and the residences on Furlong Place, are currently located and where additional sensitive receptors are planned in the future. These beneficial effects were clarified in the Final EIS Appendix Q, Section 3.5 (Air Quality and Global Climate Change), Pages 3.5-19 and 3.5-20. In addition, the reduction in emissions from reduced train movements would outweigh the minimal increase in vehicle idling emissions from any new queuing. The potential increases in idling emissions would not be substantial enough to require further dispersion modeling based upon the typical criteria triggering such analysis (for example, a significant increase in diesel truck volumes or worsening of LOS) and other attainment demonstrations in the Basin. Therefore, as the Malabar Yard railroad improvements would both reduce overall freight rail movement and move rail traffic away from air quality sensitive receptors, an operational health risk assessment is not needed.

*Conclusion*

Air quality impacts to sensitive receptors further away from the emission source would be less likely to be impacted than those identified through the LST analysis. Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.

*Vehicle Idling Emissions* – When the commenters request a more detailed analysis of idling emissions in Vernon, they are effectively requesting a dispersion modeling analysis. Dispersion modeling uses the emissions from a source and localized atmospheric processes to predict concentrations of a pollutant at specific locations downwind from the source. This model is typically used to demonstrate project compliance with the NAAQS or for large stationary sources (e.g. power plants). This level of detailed analysis is not necessary at Malabar Yard because the vehicle idling emissions would be so minimal that it would not cause a violation of any air quality standard. Per the EPA's PM Hot-Spot Guidance and FHWA's Guidance on Mobile Source Air Toxic (MSAT) Analysis, this type of project would not qualify for quantitative dispersion modeling and therefore would not have the potential to result in significant localized emissions. Although dispersion modeling is not required under NEPA or CEQA, to be responsive to multiple comments received regarding the potential for vehicular idling emissions, this discussion summarizes the two main criteria that could trigger the need for dispersion modeling along the affected roadways and intersections in the City of Vernon. The analysis below demonstrates no reason for completing dispersion modeling for the Malabar Yard railroad improvements.

- *Criterion 1*: The Project would not cause high traffic volumes – The Malabar Yard railroad improvements would not generate new traffic trips or add any additional diesel vehicles that could add idling emissions but would rather redistribute existing traffic (see Key Issue Response #2 above). The roadways considered in the environmental evaluation are local roads that do not have the volumes typical of highways where a quantitative dispersion modeling analysis may be warranted. As described the EPA's PM Hot-Spot Guidance, according to Section 93.123(b) of the conformity rule, projects that require a hot spot analysis include new or expanded highway projects with a significant number of diesel vehicles.[4] Furthermore, the FHWA states that projects with higher potential MSAT effects would include projects that create new capacity or add significant capacity to urban highways, such as interstates, urban arterials, or urban collector-distributor routes with traffic volumes where the AADT is projected to be in the range of 140,000 to 150,000 or greater by the design year and are located in proximity to populated areas.[5] Therefore, as the Malabar Yard railroad improvements would not add new capacity, new vehicle trips, or have traffic counts of 140,000 to 150,000 AADT or greater for any local roadway in the City of Vernon, a quantitative analysis is not required. Projects of this type are not likely to have significant emissions of mobile source air toxics.

[4] U.S. EPA. October 2021. Project-Level Conformity and Hot-Spot Analyses. https://www.epa.gov/state-and-local-transportation/project-level-conformity-and-hot-spot-analyses#PM-Resources Accessed March 17, 2025.

[5] U.S. DOT. January 2023. Federal Highway Administration. Updated Interim Guidance on MSAT Analysis in NEPA Documents. https://www.fhwa.dot.gov/environMent/air_quality/air_toxics/policy_and_guidance/msat/ Accessed March 17, 2025.

- *Criterion 2*: The Project would not worsen LOS – Final EIS Appendix Q Section 3.3 presents the traffic delay analysis at intersections and roadway segments considered. There would not be a substantial increase in vehicle idling. As noted in the bullet above for Criterion 1, the Malabar Yard railroad improvements would not generate new traffic trips or add any additional diesel vehicles that could add idling emissions While certain intersections and roadway segments would experience traffic delays that would be considered a direct adverse effect in the unmitigated scenario, these effects would be reduced to a level that is not adverse with implementation of Malabar Yard Mitigation Measures TR-1 through TR-5. Therefore, the Malabar Yard railroad improvements would not worsen LOS.

### Conclusion

Fewer train movements on the Harbor Subdivision equates to less vehicle idling at each of the at-grade crossings where sensitive receptors, such as the Vernon City School and the residences on Furlong Place are currently located and where additional sensitive receptors are planned in the future.

Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.

The Project would not generate new traffic trips or add any additional diesel vehicles that could add idling emissions but would rather redistribute existing traffic. There would not be a substantial increase in vehicle idling. The Malabar Yard railroad improvements would not worsen LOS. Since the Project does not meet either of the above criteria, dispersion modeling is not required and localized air quality impacts from vehicle idling would be less than significant.

Based on the comments received during public review, the analysis provided in the Draft EIS/SEIR, and the clarification information provided above, the addition of any incremental emissions from vehicle idling as a result of the Malabar Yard railroad improvements would not be significant and would not cause an exceedance of any air quality threshold. Therefore, there is no change to the air quality conclusions presented in the Draft EIS/SEIR. Air quality impacts from vehicle idling emissions would be minimal.

## 1.2.4 Key Issue Response #4 – Public Safety Response Times and Emergency Vehicle Access

### Description of Comment/Concern

During the 45-day public comment period, multiple comments expressed concerns that the Malabar Yard railroad improvements would increase public safety response times and cause impacts to emergency vehicle access within the City of Vernon. This key issue response provides a discussion of the following sub-topic areas as they are pertinent to the comments and concerns raised and the environmental evaluation performed for public safety response times and emergency vehicle access:

1. Traffic Delay and Mitigation – An overview of the intersection and roadway segment impacts and mitigation measures that would be implemented to maintain or improve traffic conditions.
2. Potential Roadway Hazards – An overview of the vehicle queueing that may occur along Seville Avenue, which could impede emergency access.
3. Response Times – A discussion of patrol areas and ability for responding officers to access the study area.

## Technical Response

Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Final EIS conclusion related to response times for emergency service providers.

## Traffic Delay and Mitigation

As disclosed in Draft EIS/SEIR Appendix Q Section 3.14, traffic delays to emergency responders could occur during construction and operation. As discussed in Key Issue Response #2, the v/c ratio threshold is a ratio of the traffic volumes during the peak hour compared to the lane capacity, and is the metric used to determine if traffic congestion would occur. During construction, the v/c ratio threshold would be exceeded at two intersections; thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measure TR-1 requires advanced notifications of roadway closures and detours be provided to applicable parties (emergency service providers, public transit and bus operators, businesses, bicycle community, and organizers of special events). During the operations scenarios such as Project Opening Year 2024 and Future Build 2040, the v/c ratio threshold would be exceeded at two intersections and one roadway segment. Malabar Yard Mitigation Measures TR-2 through TR-5 include roadway modifications (restriping, additional turn lanes/vehicular lanes) to mitigate the adverse effect associated with traffic delay by maintaining or improving the v/c ratio during construction and

operation. This conclusion is presented in Final EIS Appendix Q Section 3.3, Pages 3.3-35 through 3.3-42.

## Potential Roadway Hazards

As disclosed in Final EIS Appendix Q Section 3.3, Page 3.3-48, a new railroad crossing at the intersection of Seville Avenue and 46th Street could cause southbound vehicular traffic to extend across 46th Street. While blocking an intersection is not a legal vehicular maneuver and queuing is not an LOS related traffic impact that constitutes a significant impact/adverse effect under CEQA/NEPA,[6] the increase in queue at this location may introduce a potential roadway hazard or impede access for emergency responders at this location. Malabar Yard Mitigation Measure TR-6 minimizes the potential roadway hazard as effectively as possible because it requires roadway design, railroad safety devices, and accessibility to be coordinated with the City of Vernon and California Public Utilities Commission (CPUC). Potential roadway safety devices that may be considered for future implementation include queue cutter traffic signals or pre-signals for the new railroad crossing on Seville Avenue.

## Response Times

The information under the Response Times subtopic including detailed response route and access analysis, was prepared and coordinated with the Vernon Police Department after the close of the 45-day public comment period during preparation of the Final EIS.

### *Emergency Services*

To be responsive to comments and inquiries related to potential changes to emergency response times and access, further evaluation was performed by Metro in close coordination with the City of Vernon to determine the worst potential daily delay trains could cause to emergency response in the existing and proposed condition. Key assumptions that were confirmed during coordination meetings with Metro and City of Vernon are as follows:

Based on input received from the City of Vernon in October and November 2024, it was determined to be reasonable to assume responders originate from the Police and Fire Stations located at the corner of East Vernon Ave and Santa Fe Avenue for comparison purposes between the existing and proposed conditions.

- Responders would utilize routes with shortest distance.
- Existing and proposed routes have an average speed of 35 mph.
- Emergency responders currently use 49th Street in the existing condition but this route would be closed in the proposed condition.

Upon review of each train route the worst-case potential delay a train could cause to emergency response would be 1.7 minutes per train movement. Using this worst-case delay (1.7 minutes)

[6] County of Los Angeles. 1997. County of Los Angeles Department of Public Works Traffic Impact Analysis Report Guidelines.

and the frequency of train movements along each of the affected routes, a total sum of the potential delay per route was determined to then compare the total delay in minutes per day from all train movements on each of the affected train routes (Table 4).

Table 4 below shows the sum of the worst-case daily delay for the affected train routes is 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4, the total delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction to total delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future).

**Table 4. Total Delay from Trains on Affected Routes (Existing and Future)**

| Train Route and Destination/Customer | Delay | Total daily train movements (weekday) | Delay Sum |
|---|---|---|---|
| ***Existing Train Movements (8 Total Movements/Day)*** | | | |
| Hobart Yard to/from Malabar Yard | 1.7 minutes | 4 | 6.8 minutes |
| Malabar Yard to/from West Seville | 1.7 minutes | 2 | 3.4 minutes |
| Malabar Yard to/from Exxon | 1.7 minutes | 2 | 3.4 minutes |
| | | ***Sum of Worst Daily Delay Scenarios*** | ***13.6 minutes*** |
| ***Future Train Movements (4.85 Total Movements/Day)*** | | | |
| Hobart Yard to/from Malabar Yard | 1.7 minutes | 0.85 | 1.45 minutes |
| LAJ to West Seville (via 46th Street Connector) | 1.7 minutes | 2 | 3.4 minutes |
| LAJ to Exxon (via 46th Street Connector) | 1.7 minutes | 2 | 3.4 minutes |
| | | ***Sum of Worst Daily Delay Scenarios*** | **8.25 minutes** |

***Source: BNSF October and November 2024***

The analysis above demonstrates that the fewer train movements that would occur on the Harbor Subdivision parallel to Santa Fe Avenue would result in a reduced total daily delay; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Final EIS conclusion related to response times for emergency service providers.

## Conclusion

Mitigation measures would be implemented to avoid adverse effects associated with traffic delay. Based on the analysis performed by Metro, in coordination with BNSF and the City of Vernon, no substantial change to the distance or average delay that may affect response times is expected to occur.

While the potential for vehicle queueing to impede access for emergency responders could occur, Malabar Yard Mitigation Measure TR-6 minimizes the potential roadway hazard because it requires roadway design, railroad safety devices, and accessibility to be coordinated with the City of Vernon and California Public Utilities Commission (CPUC).

Based on the comments received during public review, the analysis provided in the Draft EIS/SEIR, and the clarification information provided above, there is no change to the emergency response time conclusions presented in the Final EIS. The public comments have not identified new adverse effects related to public safety response times and emergency vehicle access in the City of Vernon.

## 1.2.5 Key Issue Response #5 – Operational and Physical Impacts to Businesses in Vernon

### Description of Comment/Concern

During the 45-day public comment period, multiple comments were received related to operational and physical impacts to businesses upon implementation of the Malabar Yard railroad improvements within the City of Vernon. The following key issue response was prepared to provide a comprehensive overview of the following sub-topic areas to support the environmental evaluation and conclusions made in the Draft EIS/SEIR:

1. Lost Property Tax Revenues, Potential Loss of Jobs, Relocation of Existing Businesses
2. Parking Impacts

### Technical Response

Two design options for the 49th Street Closure and 46th Street Connector were fully evaluated at an equal level of detail in the Draft EIS/SEIR.

- Design plans for Design Option 1 (for both 49th Street and 46th Street) were prepared by BNSF in June 2020. Design Option 1 was presented in the Revised NOI and Virtual Scoping Meeting in October 2020.
- Design plans for Design Option 2 (for both 49th Street and 46th Street) were prepared by BNSF in February 2021 after receiving substantial feedback from stakeholders and business owners within the vicinity of the Malabar Yard railroad improvements. Design Option 2 was developed to reduce potential operational and physical impacts on adjacent properties. At each location, Metro expects that Design Option 2 will reduce impacts as follows:
    - 49th Street Closure – Design Option 2 would facilitate safe and legal ingress/egress to the three affected properties on the northwest quadrant of the 49th Street at-grade crossing. Design Option 2 would also reduce the number of potentially affected private parking spaces on the property located on the southwest quadrant of the 49th Street at-grade crossing.

- 46th Street Connector – Design Option 2 would reduce physical impacts on three properties located on the south side of 46th Street between Pacific Boulevard and Seville Avenue. Design Option 2 avoids building demolition and driveway modifications.

Final EIS Appendix Q includes the full environmental evaluation and design plans (Appendices A and B). As discussed above in Key Issue Response #1, between December 2024 and February 2025, Metro met with property owners/tenants that would be directly impacted by the Malabar Yard railroad improvements and additional property owners/tenants and/or representatives that are not directly impacted but provided comments on the Draft EIS/SEIR during the Draft EIS/SEIR public comment period. Three of the property owners and representatives expressed a preference for Design Option 2 at both locations and only 1 tenant expressed preference for Design Option 1 for the 46th Street Connector, mainly because proposed infrastructure would be located further away from their property located on the north side of 46th Street. For the reasons discussed above, Design Option 2 for both 49th Street Closure and 46th Street Connector, is the Preferred Alternative.

***Lost Property Tax Revenues, Potential Loss of Jobs, Relocation of Existing Businesses***

As stated in the Final EIS Appendix Q Section 3.13, building demolition may result in lost property tax revenues and potential loss of jobs.

- Design Option 1 of the Malabar Yard railroad improvements would require approximately 48,872 square feet of building space, $61,001 property tax losses to the county and city, and up to 46 jobs could be displaced (Final EIS Appendix Q Section 3.13, Page 3.13-6).
- For Design Option 2 of the Malabar Yard railroad improvements, 9,711 square feet of building space would be required resulting in $3,641 of property tax losses to the county and city annually and up to nine jobs could be displaced (Final EIS Appendix Q Section 3.13, Page 3.13-10).

The number of displaced jobs was estimated based on an industry-standard approach using the total building square footage displaced and the average building square feet per industrial job (1,061.5). As identified in the Draft EIS/SEIR, as part of future real estate and Metro's Relocation Assistance Program and the Uniform Relocation Act benefits processes, any businesses subject to building demolition or displacement would be compensated or referred to potential and/or suitable replacement sites. Given that there is available land within and surrounding the Malabar Yard study area and that industrial businesses may not be dependent on local patronage, some relocation of businesses could be assumed.

***Parking Impacts***

*CEQA Analysis (SB 743 and Case law)* - SB 743 discusses impacts from parking, stating that "the adequacy of parking for a project shall not support a finding of significance." (See Pub. Resources Code, § 21099(b)(3).). On August 19, 2021, in Save Our Access – San Gabriel Mountains vs Watershed Conservation Authority, the Second District Court of Appeal found that impacts on

"parking" are not in and of themselves impacts under CEQA. The Court also cited San Franciscans Upholding the Downtown Plan v City & County of San Francisco (2002) that "social inconvenience of having to hunt for scarce parking spaces is not an environmental impact" and "Parking deficits are always inconvenient for drivers, but they do not always cause a significant adverse physical impact on the environment." A reduction in parking is usually a social and not an environmental impact.

*NEPA Analysis* - For disclosure purposes, the loss of parking on private properties is discussed in Final EIS Appendix Q Section 3.2, Page 3.2-11, under Topic 3.2-A, Alteration of Land Use Patterns. As discussed in Appendix Q, the analysis concluded that although existing land uses (parking areas) would be altered, no direct adverse effects would occur because the properties would still be usable after implementation of the railroad improvements at this location. This conclusion is based on context considering the amount of existing parking that would remain on the affected private properties and intensity of the impact considering the removed spaces equates to a minimal amount of total parking spaces available.

Furthermore, Metro and BNSF will coordinate with the City of Vernon to identify opportunities for long-term parking solutions to offset loss of parking that may occur upon implementation of the Malabar Yard railroad improvements. Given the discretionary authority of the Public Works Director and allowance to provide substitute parking spaces under Section 17.56.50 of the Comprehensive Zoning Ordinance, Metro expects that it can identify parking solutions that would not conflict with the ordinance; and therefore, the loss of parking will not cause an adverse effect.

*Parking Opportunities Example* - In February 2021, Metro and BNSF identified two different parking configurations that were presented to the City of Vernon staff and property owners for the area on the east side of the 49th Street Closure where permanent bollards are proposed. No opposition was received on the proposal to provide new parking spaces on 49th Street east of Malabar Yard.

## Conclusion

With both design options considered, some job loss resulting from potential building demolition may occur; however, as part of Metro's Relocation Assistance Program and the Uniform Relocation Act benefits processes, any businesses subject to building demolition or displacement would be compensated or referred to potential and/or suitable replacement sites. Parking impacts may occur, and when considering both context (total spaces available) and intensity (number of spaces removed), no adverse effect would occur because the properties would still be usable. Operational and physical impacts to businesses would be minimized by implementing Design Option 2, as the Preferred Alternative, at both locations.

Based on the comments received during public review, the analysis provided in the Draft EIS/SEIR, and the clarification information provided above, there is no change to the property impacts conclusions presented in the Draft EIS/SEIR. The public comments have not identified new adverse effects related to property impacts in the City of Vernon.

## 1.2.6 Key Issue Response #6 – Land Use and Planning Analysis Related to 2023 Vernon Westside Zone Change and General Plan Amendment (adopted July 2023)

### Description of Comment/Concern

During the 45-day public comment period, multiple comments were received related to consideration of the future land uses allowable as part of the *2023 Vernon Westside Zone Change and General Plan Amendment* and the Project's consistency with future mixed-use residential land uses on the City's westside.

### Technical Response

The *2023 Vernon Westside Zone Change and General Plan Amendment* (adopted July 2023) was not considered in the Draft EIS/SEIR environmental evaluation because the zone change and amendment was not formally adopted at the time the Revised NOI was issued in September 2020.

The technical response provides a summary of the applicable CEQA provisions to support the impact analysis methodology and conclusions in the Draft EIS/SEIR, applicable excerpts of the Program EIR (PEIR) for the *2023 Vernon Westside Zone Change and General Plan Amendment* that demonstrate why the analysis of potential environmental impacts on future land uses would be addressed in future environmental documentation, and NEPA provisions that require a consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment*.

#### *Draft EIS/SEIR - Land Use and Planning Analysis and Baseline Information*

A summary of the applicable CEQA provisions related to the threshold of significance for Land Use and Planning and Baseline Information is provided below to support the impact analysis methodology and conclusions in the Draft EIS/SEIR.

- ***CEQA Threshold of Significance (Land Use and Planning)*** – In accordance with the most recent 2023 CEQA Guidelines Appendix G Environmental Checklist, the land use and planning impact evaluation considers potential for significant environmental impacts due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The *2023 Vernon Westside Zone Change and General Plan Amendment* was not adopted for the purpose of avoiding or mitigating an environmental effect. As discussed in Final SEIR, Page 7-256, no impact was identified because no conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would occur and acquisitions and associated modifications to building setbacks and parking would not cause significant environmental impacts.
- ***Baseline Information*** – The 2023 CEQA Guidelines Section 15125(1) provides the following guidance for establishing the baseline:

> Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective.
>
> CEQA Guidelines Section 15125(3) also states "An existing conditions baseline shall not include hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the baseline."

For these reasons described above, the planned land uses outlined in the *2023 Vernon Westside Zone Change and General Plan Amendment* were not considered as the baseline. In conjunction with CEQA Guidelines Section 15125 above, the baseline year for the Malabar Yard railroad improvements, was set in September 2020 when the Revised NOI was issued and the analysis conducted for the Draft EIS/SEIR referenced the City of Vernon Zoning Code from 2016 and City of Vernon General Plan Land Use Element from 2007. These referenced documents were the most recent adopted documents at the time the environmental analysis commenced.

***Future Analysis of Potential Effects on Mixed-Use Residential Land Uses***

On Page 2.0-27 of the Draft PEIR for the *2023 Vernon Westside Zone Change and General Plan Amendment*, it is disclosed that the exact nature of Vernon Westside Zone Change development through 2040 is not known and that the actual rate and amount of development will depend on market conditions and regulatory processes. Therefore, the analysis of potential environmental impacts on future land uses would be the responsibility of future developers during the environmental review and entitlement phase of those projects.

As stated in the Draft PEIR for the *2023 Vernon Westside Zone Change and General Plan Amendment*, it is contemplated that future site-specific approvals in the Vernon Westside Zone Change area would be evaluated under CEQA rules for subsequent approvals. In addition, the Draft PEIR identified that an EIR or an individual development project will be more detailed in the specific effects of the project than will an EIR on the adoption of a general plan or zoning ordinance because the effects of the individual development can be predicted with greater accuracy.

***Community Improvements***

As discussed above in Key Issue Response #1, Metro's coordination activities with the City of Vernon led to the identification of multiple community improvements that would further support the City's development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. The community improvements are incorporated in the Final EIS as OMMs because they would complement existing mitigation measures, further limit or compensate for potential impacts disclosed in the Draft EIS/SEIR that were raised by members of the public during the 45-day public comment period, support the City's planning initiatives, and provide benefits to the local community at large.

***Land Use Consistency Analysis***

As required by 40 C.F.R. 1502.16(c), Metro performed a consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023) for inclusion in the Final EIS (Table 5). The policies in the table below include the amended text of the City's general plan, with a summary evaluation of the consistency with the Malabar Yard railroad improvements.

| **Table 5. Consistency with Applicable Policies/Goals of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023)** | |
|---|---|
| **Policy/Goal** | **Malabar Yard Railroad Improvements** |
| ***Local*** | |
| ***City of Vernon General Plan (Amended 2023)*** | |
| **Policy LU-1.1:** Allow manufacturing and industrial use on all properties in Vernon. | Consistent. The Malabar Yard railroad improvements would support manufacturing and industrial uses on properties throughout Vernon. |
| **Policy LU-1.2:** Accommodate, at limited and specific areas of the City, those commercial, service, and retail uses that complement but do not detract from the purposely established industrial character of the City. | Consistent. The Malabar Yard railroad improvements would be constructed primarily within the existing railroad ROW in an urbanized environment with a heavy presence of existing transportation infrastructure and industrial land uses. All infrastructure improvements would be consistent with the existing character within the Malabar Yard study area. As such, the Malabar Yard railroad improvements would complement and not detract from the industrial character of the city. Malabar Yard railroad improvements do not preclude implementation of commercial, service, and retail uses within the Malabar Yard study area. |
| **Policy LU-1.5:** Continue to maintain up-to-date information regarding flooding hazards consistent with the Safety Element. | Consistent. The Malabar Yard railroad improvements would not conflict with land use policies regarding flooding hazard information. Maintenance of up-to-date information regarding flooding hazards would be the responsibility of the City. |
| **Policy LU-2.5:** Assist with the reuse of properties from one industrial use to another. | Consistent. The Malabar Yard railroad improvements would not preclude reuse of properties. |
| **Goal LU-2.4:** Provide land use flexibility in underinvested areas of the City to accommodate the City's need for additional population, commercial services and amenities, and to diversify the industrial base of the City into new people-centric industries. | Consistent. The Malabar Yard railroad improvements do not preclude the City's ability to invest in the study area for the *2023 Vernon Westside Zone Change and General Plan Amendment*. The 46th Street Connector would result in 78 percent less train movements along the Harbor Subdivision, parallel to Santa Fe Avenue where residential land uses are planned. |
| **Policy CI-1.1:** Continue to improve the street system to meet the minimum standards contained in the Circulation and Infrastructure Element. | |

| Table 5. Consistency with Applicable Policies/Goals of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023) | |
|---|---|
| **Policy/Goal** | **Malabar Yard Railroad Improvements** |
| **Policy CI-1.2:** Continue to coordinate with the rail companies to provide for efficient rail service that minimizes impacts on the local street system. | Consistent. All roadway and other civil infrastructure design plans would be coordinated with the City of Vernon to provide for efficient rail service that minimizes impacts on the local street system.<br><br>The 46th Street Connector would connect two existing rail spurs, and with this consolidation, fewer train movements would occur along the Harbor Subdivision, parallel to Santa Fe Avenue where residential land uses are planned.<br><br>Metro is committed to working with the City of Vernon to implement the Malabar Yard railroad improvements in a manner that meets the objectives of multiple stakeholders. The Link US Project would include multiple regional benefits to enhance regional mobility. Metro is also working with the City of Vernon to implement community improvements, some of which enhance safety and promote transit use. |
| **Policy CI-1.3:** Limit rail yards to areas agreed on and consolidate rail spurs where feasible. | |
| **Policy CI-1.5:** Continue to pursue grade separation for railroad crossings on designated streets. | |
| **Policy CI-1.6:** Encourage the continued improvement of services provided by the Los Angeles County Metropolitan Transit Authority to Vernon and adjacent cities to provide good access from home to job and job to home for persons employed in Vernon. | |
| **Policy CI-1.7:** Encourage the use of ride sharing and public transit for persons employed in the City to reduce traffic congestion and the need for off-street parking in the City. | Consistent. The Malabar Yard railroad improvements would neither encourage nor discourage the use of ride sharing for persons employed in the City. Implementation of Offsetting Mitigation Measure MY TR-9 would provide improved bus shelters with weather protection, shade, benches, and signage at 25 locations across the City, which would promote transit use for persons employed in the City. The new bus shelters would enhance the public transit experience by providing greater comfort and convenience, making transit a more attractive option than driving and reducing parking demand. |
| **Policy CI-1.9:** Gradually eliminate unnecessary rail spur lines and permit the combination of properties across spur lines. | Consistent. The Malabar Yard railroad improvements would not preclude the elimination of unnecessary rail spur lines or combination of properties across spur lines. All roadway and other civil infrastructure design plans would be coordinated with the City of Vernon to implement the Malabar Yard railroad improvements.<br><br>The 46th Street Connector would connect two existing rail spurs. With this consolidation, fewer train movements would occur along the Harbor Subdivision, parallel to Santa Fe Avenue where mixed-use residential land uses are planned, and Vernon customers would no longer be served out of |

| Table 5. Consistency with Applicable Policies/Goals of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023) | |
|---|---|
| **Policy/Goal** | **Malabar Yard Railroad Improvements** |
| | Hobart Yard. Fewer trains on the Harbor Subdivision may result in the identification of unnecessary spur lines that may be eliminated.<br><br>The Malabar Yard railroad improvements may indirectly contribute to the elimination of unnecessary rail spur lines and combination of properties through Metro's engagement with affected property owners, some of whom have requested information on how to eliminate spur lines and repurpose the parcels for uses such as parking. |
| **Policy CI-1.12:** Cooperate with the Metropolitan Transportation Authority and other local agencies in their efforts to complete a bicycle path along the levee of the Los Angeles River connecting to adjacent jurisdictions. | Consistent. The Malabar Yard railroad improvements would not preclude the development of a bicycle path along the levee of the Los Angeles River. |
| **Policy CI-2.4:** Require an existing business or property to comply with zoning code requirements for off-street parking and loading at such time as any nonconforming building or use is required to be brought into conformity with the Zoning Code. | Consistent. Malabar Yard railroad improvements would alter a lot that may meet the definition of Legal Nonconforming Building or Standards; however, the improvements are not a triggering event as defined in Section 17.64.030 that would require a nonconforming building to be brought into conformity with the Zoning Code. Triggering events include: 25 percent of the building being vacant for more than 2 years, increase in the Floor Area of a building that does not constitute new construction or a major alteration or repair, change of use to a category that has greater parking/maneuvering, or loading requirement, minor alterations or repairs, new construction or major alteration or repair that is voluntary, or major alteration or repair that is due to force majeure. |
| **Policy S-3.2:** Require businesses handling, transporting, or producing materials considered acutely hazardous to prepare contingency plans for accidents involving these chemicals. | Consistent. Hazardous waste and materials impacts were considered, and the Malabar Yard railroad improvements would not result in adverse effects upon implementation of Malabar Yard Mitigation Measures HAZ-1 through HAZ-8 (see Final EIS Appendix Q Section 3.10, Hazardous Waste and Materials). Specifically, Malabar Yard Mitigation Measure HAZ-1 will require the preparation of a construction Hazardous Materials Management Plan that would include provisions for safe storage, containment, and disposal of chemicals and hazardous materials, contaminated soils, and contaminated groundwater used or exposed during construction, including the proper locations for disposal. |

| Table 5. Consistency with Applicable Policies/Goals of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023) | |
|---|---|
| **Policy/Goal** | **Malabar Yard Railroad Improvements** |
| **Policy S-4.1:** Review the risks related to a possible train derailment or collision and develop appropriate response programs. | Consistent. All Malabar Yard railroad improvements would be designed and constructed to comply with applicable agency standards and specifications to maximize safety for both motorized and non-motorized forms of transportation. Railroad crossing infrastructure improvements proposed at each of the at-grade crossings would be reviewed and approved by City of Vernon and CPUC in accordance with the provisions of Malabar Yard Mitigation Measure TR-6. |
| **Policy R-2.2:** Encourage and facilitate the use of public transportation to reduce emissions associated with automobile use. | Consistent. The Malabar Yard railroad improvements would involve the consolidation of freight service from the Los Angeles Junction which reduces freight train movements on the heavily congested San Bernardino Subdivision that is shared with passenger rail trains. Removing freight trains from this corridor facilitates more efficient public transportation and reduced emissions associated with automobile use. |
| **Policy R-3.4:** Continue the City's street tree planting and tree maintenance programs. | Consistent. Impacts related to tree preservation were considered, and the Malabar Yard railroad improvements would not result in adverse effects upon implementation of Malabar Yard Mitigation Measure BIO-2 (see Final EIS Appendix Q Section 3.7, Biological and Wetland Resources) which restricts damage and removal of any City-owned trees. |
| **Policy R-4.3:** Ensure compliance with CEQA provisions regarding cultural resources at the time buildings or places identified or potential historic or architectural merit are proposed for demolition. | Consistent. All applicable CEQA provisions regarding cultural resources were considered and based on the identification and evaluation process, no adverse effect on cultural resources would occur in the City of Vernon. |
| **Policy N-1.1:** Encourage the effective enforcement of local, state, and federal noise levels by all appropriate City divisions. | Consistent. Noise and vibration impacts were considered, and the Malabar Yard railroad improvements would not result in adverse noise or vibration effects (see Final EIS Appendix Q Section 3.6, Noise and Vibration). Based on the outcome of the stakeholder engagement process with property owners, tenants, and business stakeholders, Metro developed new design |
| **Policy N-1.2:** Review noise impacts when rail corridors are consolidated, and review ways to reduce impacts on adjacent businesses. | |

| Table 5. Consistency with Applicable Policies/Goals of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023) | |
|---|---|
| **Policy/Goal** | **Malabar Yard Railroad Improvements** |
| **Policy N-1.3:** Minimize adverse noise effects on new residential developments through carefully planned site design and construction approaches that limit noise intrusions, wherever practical. | configurations for both the 49th Street Closure and the 46th Street Connector. Design Option 2 for each of the Malabar Yard railroad improvements was developed specifically to reduce operational and physical impacts to businesses.<br><br>The Malabar Yard railroad improvements would reduce train movements along the Harbor Subdivision which would have a corresponding reduction of freight train noise effects along this portion of the community. The community improvements would further reduce noise along the Santa Fe Avenue corridor if the quiet zone were implemented.<br><br>Additionally, no potentially affected properties have operations or processes that are considered noise and vibration sensitive. The noise and vibration analysis performed for the Malabar Yard railroad improvements meets all applicable requirements for the type of infrastructure improvements proposed. |
| **Policy N-2.1:** Consider the noise levels likely to be produced by any new businesses or substantially expanded business activities locating near existing noise-sensitive uses such as schools, community facilities, and residences, as well as adjacent to established businesses involving vibration-sensitive activities. | |
| **Policy N-2.2:** Encourage acoustical design in all new construction. | |
| **Policy N-2.3:** Prohibit the establishment of new noise-sensitive land uses in Vernon, including but not limited to schools, day-care facilities, and community facilities. Permit new residential uses only within the Housing Overlay District and require new developments to incorporate appropriate noise attenuation to achieve City noise standards. | |
| ***Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023)*** | |
| The City of Vernon's Comprehensive Zoning Ordinance establishes development rules for the city, carrying out the objectives laid out in the General Plan. The purpose of the City of Vernon Zoning Ordinance is to designate, regulate, and restrict the use, location, and size of buildings, ancillary structures, and land for industrial uses and other permitted purposes and establish performance and development standards in order to protect public health, safety, and welfare. To achieve this, zones within the City and various Overlay Zones have been deemed best suited to carry out these regulations.<br><br>The *2023 Vernon Westside Zone Change and General Plan Amendment* (adopted in July 2023) allows for additional residential and commercial uses in the form of mixed-use development within specific areas of the City. | Consistent. While improvements associated with the Malabar Yard railroad improvements would reduce on- and off-street parking, and may encroach into some private properties, the affected parcels meet the definition of a Legal Nonconforming Status under the City of Vernon Comprehensive Zoning Ordinance Section 17.64.030. According to the Comprehensive Zoning Ordinance Section 17.16.020, a Legal Nonconforming Building refers to a building or ancillary structure or portion thereof which was lawfully erected or altered and maintained but which, because of the application of this Chapter, no longer conforms to the regulations set forth in this Code applicable to the zone or overlay zone in which such building or ancillary structure is located, including failure to comply with the Development Standards or Site Planning Standards applicable to such Zone or Overlay Zone. As analyzed in the Final EIS Appendix Q Section 3.2, Land Use and Planning, the Malabar Yard railroad improvements would meet this definition as there is an allowable pre-existing nonconformance with the zoning code. |

**Table 5. Consistency with Applicable Policies/Goals of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023)**

| Policy/Goal | Malabar Yard Railroad Improvements |
|---|---|
| | Construction and operations of the Malabar Yard railroad improvements would not change the status unless certain triggering events occur, such as 25 percent of the building being vacant for more than 2 years, increase in the Floor Area of a building that does not constitute new construction or a major alteration or repair, change of use to a category that has greater parking/maneuvering, or loading requirement, minor alterations or repairs, new construction or major alteration or repair that is voluntary, major alteration or repair that is due to force majeure.<br><br>The Malabar Yard railroad improvements do not meet the definition of a triggering event and the affected parcels would continue to be out of compliance with the Zoning Ordinance, and allowed as a Legal Nonconforming Building or Standards. Therefore, the business on affected parcels have the right to continue as nonconforming uses.<br><br>Furthermore, Metro and BNSF will coordinate with the City of Vernon to identify opportunities for long-term parking solutions to offset loss of parking that may occur upon implementation of the Malabar Yard railroad improvements. Given the discretionary authority of the Public Works Director and allowance to provide substitute parking spaces under Section 17.56.50 of the Comprehensive Zoning Ordinance, Metro expects that it can identify parking solutions that would not conflict with the ordinance; and therefore, the loss of parking will not cause an adverse effect. |

***Notes:***
***Basin Plan=Water Quality Control Plan for the Los Angeles Region; CPUC=California Public Utilities Commission; FRA=Federal Railroad Administration; HSR=high-speed rail; Link US=Link Union Station; NPDES=National Pollutant Discharge Elimination System; ROW=right-of-way; RTP=Regional Transportation Plan; RWQCB=Regional Water Quality Control Board; SCAG=Southern California Association of Governments; SCS=Sustainable Communities Strategy; SWPPP=Stormwater Pollution Prevention Plan***

***Conclusion***

The Draft EIS/SEIR was prepared in accordance with the applicable CEQA provisions and the Final EIS was updated to include a consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment*. While future residential land uses are planned in the vicinity of proposed Malabar Yard railroad improvements, it should be acknowledged that the proposed railroad improvements and future residential land uses can coexist, and the City has the discretion to approve new development in areas that are adjacent to or in close proximity to existing freight rail corridors. The proposed Malabar Yard railroad improvements would not preclude implementation of the City's future development goals. As analyzed in Table 5 above, the Malabar Yard railroad improvements were determined to be consistent with the goals and policies within the *2023 Vernon Westside Zone Change and General Plan Amendment*, and no inconsistencies were found. Therefore, no conflict would occur with implementation of the Malabar Yard railroad improvements.

Based on the comments received during public review, the analysis provided in the Draft EIS/SEIR, and the clarification information provided above, there is no change to the land use and planning impacts or conclusions presented in the Draft EIS/SEIR. The public comments have not identified new adverse effects related to land use and planning in the City of Vernon.

## 1.3 List of Agencies, Organizations, and Individuals that Commented on the Draft EIS/SEIR

Agencies, organizations, and individuals that commented on the Draft EIS/SEIR are listed in Table 6.

**Table 6. List of Agencies, Organizations, and Individuals that Commented on the Draft EIS/SEIR**

| Comment Number | Name |
|---|---|
| ***Agencies*** | |
| AGE 1 | Vika Sirova, U.S. Department of the Interior |
| AGE 2 | Sergeant Ray Martinez, Department of California Highway Patrol |
| AGE 3 | Daniel S. Wall, City of Vernon |
| AGE 4 | Clifton Meek, US EPA |
| AGE 5 | Mayor Judith Merlo, City of Vernon |
| AGE 6 | Paul Hubler, Metrolink |
| AGE 7 | Jenny Scanlin, Housing Authority for the City of Los Angeles (comments received 2/19/25 - outside of 45-day public comment period) |

| Table 6. List of Agencies, Organizations, and Individuals that Commented on the Draft EIS/SEIR | |
|---|---|
| **Comment Number** | **Name** |
| ***Organization*** | |
| ORG 1 | Michael Schneider, Streets for All |
| ORG 2 | Michael Schneider, Streets for All |
| ORG 3 | David Schonbrunn, Train Riders Association of California (TRAC) |
| ORG 4 | Jeremy Stutes, The Transit Coalition |
| ORG 5 | Jeremy Stutes, The Transit Coalition |
| ORG 6 | Eli Lipmen, Move LA |
| ORG 7 | Amy Gantvoort, LA Derby Dolls |
| ORG 8 | Ellen Endo, Little Tokyo Business Association |
| ORG 9 | Martha Jimenez, California Endowment |
| ORG 10 | Bryan Ramos Fernandez, Los Angeles Unified School District |
| ORG 11 | Bart Reed, The Transit Coalition |
| ORG 12 | Marisa Olguin, Vernon Chamber of Commerce |
| ***Tribal*** | |
| No comments have been received from any tribes to date. | |
| ***Individuals*** | |
| IND 1 | Joey Quinto, California Journal for Filipino Americans |
| IND 2 | Jason Sleisenger |
| IND 3 | Bernard Niesen |
| IND 4 | Mark Baker, Soft Lights Foundation |
| IND 5 | Amy Wasson |
| IND 6 | Todd Saalman |
| IND 7 | Robert Frampton, RailPAC |
| IND 8 | Connor Webb |

**Table 6. List of Agencies, Organizations, and Individuals that Commented on the Draft EIS/SEIR**

| Comment Number | Name |
|---|---|
| IND 9 | Jessica Capuano |
| IND 10 | Greg |
| IND 11 | Jay Chen |
| IND 12 | Layla Porter |
| IND 13 | Greg Heet |
| IND 14 | Mario Dominguez Jr. |
| IND 15 | Mario Dominguez Jr. |
| IND 16 | Joshua Dungca |
| IND 17 | William Dennis Nahl |
| IND 18 | James Kiehl |
| IND 19 | Mario Dominguez Jr. |
| IND 20 | Mario Dominguez Jr. |
| IND 21 | Frank H Gallo |
| IND 22 | Mario Dominguez Jr. |
| IND 23 | Paul Wennberg |
| IND 24 | Mario Dominguez Jr. |
| IND 25 | Justin Wong |
| IND 26 | Michael Melideo |
| IND 27 | Evelyn Davila |
| IND 28 | Jack Klein |
| IND 29 | Patricia Roach Finkel |
| IND 30 | Melissa Ybarra |
| IND 31 | Peter Miladeo |

| Table 6. List of Agencies, Organizations, and Individuals that Commented on the Draft EIS/SEIR | |
|---|---|
| **Comment Number** | **Name** |
| IND 32 | Frank Zells |
| IND 33 | Steve Florman |
| IND 34 | Nikki |
| IND 35 | Marisa Olguin |
| IND 36 | Mario Dominguez Jr. |
| IND 37 | John Rhee |
| IND 38 | Richard Lucas |
| IND 39 | Adam |
| IND 40 | Nikki |
| IND 41 | Frank Zells |
| IND 42 | John Rhee |
| IND 43 | Mario Dominguez Jr. |
| IND 44 | Patricia Roach Finkel |
| IND 45 | Patricia Roach Finkel |
| IND 46 | Mario Dominguez Jr. |
| IND 47 | Guthre Leonard |
| IND 48 | Paul A. Brown |
| IND 49 | Miguel Roldan |
| IND 50 | Kerry |
| IND 51 | Bryan Theis |
| IND 52 | Keith Jefferies |
| IND 53 | Paul Wennberg |
| IND 54 | Rebecca Samonte |

| Table 6. List of Agencies, Organizations, and Individuals that Commented on the Draft EIS/SEIR | |
|---|---|
| **Comment Number** | **Name** |
| IND 55 | Anita Diaz |
| IND 56 | Bernard Niesen |
| IND 57 | Jerard D Wright |
| IND 58 | David Welch |
| IND 59 | Sara Fenton |
| IND 60 | Michael Melideo |
| IND 61 | Martin S. Hoecker-Martinez |
| IND 62 | Christian John Bradley |
| IND 63 | James H. Stewart |
| IND 64 | David |
| IND 65 | Kurt Canfield |
| IND 66 | Jamie Shepherd |
| IND 67 | Tom Busse |
| IND 68 | Andrew Cobb |
| IND 69 | Seneca Velling |
| IND 70 | Fred Butts |
| IND 71 | Zuri Rashad |
| IND 72 | Dominic Bendinelli |
| IND 73 | Greg Heet |
| IND 74 | Steven Florman |
| IND 75 | Sharon |
| IND 76 | Michele Florman |
| IND 77 | David Tran |

| Table 6. List of Agencies, Organizations, and Individuals that Commented on the Draft EIS/SEIR | |
|---|---|
| **Comment Number** | **Name** |
| IND 78 | Steve Sobol |
| IND 79 | Gabe Ketron |
| IND 80 | Michael Melideo |
| IND 81 | Jeremy Stutes |
| IND 82 | Abraham Orozco |
| IND 83 | Julissa Orozco |
| IND 84 | Bridget Illing |
| IND 85 | Elizabeth Clark |
| IND 86 | Jack Cline |
| IND 87 | Corrine Eldridge |
| IND 88 | Alexander Luckett |
| IND 89 | Ernest Convento |
| IND 90 | Carrie Armellino |
| IND 91 | Chloe Cipolla |
| IND 92 | Sara Fenton |
| IND 93 | Alana White |
| IND 94 | Connor Webb |
| IND 95 | Joshua Ellman |
| IND 96 | Janina Fischer |
| IND 97 | Gabriela Varley |
| IND 98 | Neda Saleem |
| IND 99 | Eve Sanchez |
| IND 100 | Ren Gamboa |

| Table 6. List of Agencies, Organizations, and Individuals that Commented on the Draft EIS/SEIR | |
|---|---|
| **Comment Number** | **Name** |
| IND 101 | Jennifer Whitehead |
| IND 102 | Barbara Sazama |
| IND 103 | Joseph Rogers |
| IND 104 | Gary Kawaguchi |
| IND 105 | Dennis Berman |
| IND 106 | Dana Runge |
| IND 107 | Harper McCallie |
| IND 108 | Tami Van Ert |
| IND 109 | Brianne Klugiewicz |
| IND 110 | Michele Florman |
| IND 111 | Diego Effio |
| IND 112 | Jeremy Stutes |
| IND 113 | Joseph Cohen May |
| IND 114 | Chavis Ferguson |
| IND 115 | Cary Adams |
| IND 116 | Sarah Peterson (LADD) |
| IND 117 | Thomas Smith |
| IND 118 | Parker Renick |
| IND 119 | Jackson Hurst (comments received 6/5/24 - outside of 45-day public comment period) |

| Table 6. List of Agencies, Organizations, and Individuals that Commented on the Draft EIS/SEIR | |
|---|---|
| **Comment Number** | **Name** |
| IND 120 | Holly Harper (comments received 6/6/24 - outside of 45-day public comment period) |
| IND 121 | Danny Duarte (comments received 6/19/24 - outside of 45-day public comment period) |
| IND 122 | Brianna Egan (comments received 8/10/24 - outside of 45-day public comment period) |
| IND 123 | Frederick Leung (comments received 8/11/24 – outside of public comment period) |

## 1.4 Build Alternative Design Option

As discussed in Chapter 2, Alternatives and Design Options Considered, after the close of the 45-day public comment period, Metro proposed design modifications to the Build Alternative (Build Alternative Design Option) including design variations, refinements, and reductions that are addressed in the Final EIS.

These design modifications that are part of the Build Alternative Design Option qualify as a minor variation of the Build Alternative.

The Build Alternative Design Option was developed based on new information from public comments received during the 45-day public comment period related to historic preservation (Final EIS Volume III, Comments: IND 3-1, IND 5-1 IND 58-2, IND 63, IND 94-1, IND 112-1, and IND 117-3), comments from the SHPO and consulting parties as part of the Section 106 process related to historic preservation of LAUS, and new information from the engineering design process that provide opportunities to reduce the size of proposed infrastructure, avoid and reduce the magnitude and intensity of environmental effects as compared to the Build Alternative, and reduce cost in a manner that would still allow Metro to meet all provisions of the purpose and need. As a result, the Build Alternative Design Option is considered in the Final EIS, and both the terms Build Alternative and the Build Alternative Design Option are used throughout Volume III, Response to Comments, of this Final EIS, where applicable.

# Link US Final EIS Volume III

# Responses to Comments – Agencies

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**Comment Number:** AGE 1

**Name:** Vika Sirova, U.S. Department of the Interior

**Date Received:** 07/25/24

**Format Received:** Email

Subject: U.S. Department of the Interior Comments – Section 4(f)

Evaluation – Link Union

Station DRAFT Environmental Impact Statement/Supplemental

Environmental

Impact Report, June 2024

Dear Carlos Montez:

The Department of the Interior (Department), as required under Section 4(f) of the Department of Transportation Act of 1966, has reviewed the draft Section 4(f) Evaluation for the Union Link Station project.

The Department, through the National Park Service, concurs that there is no feasible and prudent alternative to the proposed use of the following 4(f) properties:

- Los Angeles Union Passenger Terminal (Resource Number H-2 on Figure 5-2)
- Vignes Street Undercrossing (Resource Number H-7 on Figure 5-2)
- North Main Street Bridge (Resource Number H-15 on Figure 5-2)

AGE 1-1

The Department has no objection to Section 4(f) approval of this project. If you have specific questions related to our comments, please contact Danette Nolan Woo at Danette_Woo@nps.gov. For all other questions, please contact me at Janet_Whitlock@ios.doi.gov

*See attachment for full document*

**AGE 1 Vika Sirova, U.S. Department of the Interior**

**AGE 1-1** The DOI's statement of concurrence there are no feasible and prudent alternatives to the proposed use of three properties and that DOI has no objection to the Section 4(f) approval is noted and appreciated.

United States Department of the Interior

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

July 25, 2024

IN REPLY REFER TO:
ER 24/0287
4111

Carlos J. Montez
Deputy Executive Officer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

Subject: U.S. Department of the Interior Comments – Section 4(f) Evaluation – Link Union Station DRAFT Environmental Impact Statement/Supplemental Environmental Impact Report, June 2024

Dear Carlos Montez:

The Department of the Interior (Department), as required under Section 4(f) of the Department of Transportation Act of 1966, has reviewed the draft Section 4(f) Evaluation for the Union Link Station project.

The Department, through the National Park Service, concurs that there is no feasible and prudent alternative to the proposed use of the following 4(f) properties:

- Los Angeles Union Passenger Terminal (Resource Number H-2 on Figure 5-2)
- Vignes Street Undercrossing (Resource Number H-7 on Figure 5-2)
- North Main Street Bridge (Resource Number H-15 on Figure 5-2)

The Department has no objection to Section 4(f) approval of this project. If you have specific questions related to our comments, please contact Danette Nolan Woo at Danette_Woo@nps.gov. For all other questions, please contact me at Janet_Whitlock@ios.doi.gov

.

AGE 1-2

Sincerely,

JANET WHITLOCK

Digitally signed by JANET WHITLOCK
Date: 2024.07.25 11:26:59 -07'00'

Janet Whitlock
Regional Environmental Officer

TRANSMITTED ELECTRONICALLY – NO HARDCOPY TO FOLLOW

**AGE 1-2** The DOI's statement of concurrence there are no feasible and prudent alternatives to the proposed use of three properties and that DOI has no objection to the Section 4(f) approval is noted and appreciated.

For the purposes of Section 4(f), the Build Alternative Design Option includes design modifications that would avoid use of Vignes Street Undercrossing and reduce the extent of permanent use and temporary occupancy of the Los Angeles Union Passenger Terminal. Avoidance and minimization of use for these Section 4f) properties is discussed in Final EIS Chapter 9, Build Alternative Design Option.

Electronic distribution: LinkUnionStation@metro.net

cc: Shawn Alam, Department of the Interior: shawn_alam@ios.doi.gov
Stefan Galvez, California High-Speed Rail Authority: Stefan.Galvez@hsr.ca.gov
Danette Woo, National Park Service: Danette_Woo@nps.gov

2

**Comment Number:** AGE 2

**Name:** Sergeant Ray Martinez, Department of California Highway Patrol

**Date Received:** 08/05/24

**Format Received:** Email

Good Morning,

Please see attached Environmental Impact Report for the Link Union Station. If you have any questions I can be reached by email or at the Central Los Angeles Area Office at [redacted].

Sergeant Ray Martinez

California Highway Patrol

Central Los Angeles Area (590)

[redacted]

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**AGE 2 Sergeant Ray Martinez, Department of California Highway Patrol**

State of California—Transportation Agency GAVIN C. NEWSOM, Governor

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
777 W. Washington Boulevard
Los Angeles, CA 90015
(213) 744-2331
(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)

August 2, 2024

File No.: 590.18035.19778

Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California, 90012

Attention: Mr. Carlos J. Montez

Dear Mr. Montez:

I was recently requested to perform an Environmental Impact Review for a project involving the Los Angeles Union Station (LAUS) (SCH #2016051071). Specifically, a ten platform track that would transport trains from Los Angeles Union Station and travel south connecting to mainline tracks along the west bank of the Los Angeles River. The California Highway Patrol's interest in commenting surrounds our concern for vehicular and pedestrian traffic. Our concerns include increased traffic congestion in the area due to the visual hazard of the tracks that will be located above the United States 101 freeway and increased congestion on all exits of the United States 101, in close proximity to the Los Angeles Union Station. There will be increased pedestrian traffic in the area, increasing calls for service for pedestrians walking on the United States 101 freeway, vandalism, and to remove objects being thrown onto the freeway from pedestrians. Due to the aforementioned concerns, we feel this project, if approved, would adversely affect the Central Los Angeles Area by the addition of pedestrian and vehicular traffic within the area.

AGE 2-1

AGE 2-2

If you need further assistance, please contact the administrative sergeant, Sergeant R. Martinez, at (213) 744-2331.

Sincerely,

J. I. PERRY, Captain
Commander
Central Los Angeles Area

Enclosure(s)

cc: Southern Division
Special Projects Section, Transportation Planning Unit

*Safety, Service, and Security* *An Internationally Accredited Agency*

**AGE 2-1** The Draft EIS/SEIR includes a thorough evaluation of potential traffic impacts, including increased congestion, during both construction and operation phases. The analysis did not identify any hazardous conditions resulting from new views of the viaduct or an adverse effect on traffic on the US-101 or surrounding roadways because the viaduct would be a similar type of structure that already exists over US-101 (Gold Line bridge and Alameda Street bridge). The design of the run-through track infrastructure is being closely coordinated with agencies such as Caltrans and the City of Los Angeles Department of Transportation and Bureau of Engineering to ensure compliance with applicable safety standards and specifications to maximize safety for both motorized and non-motorized forms of transportation.

To address construction-related impacts, Mitigation Measure TR-1 requires preparation and implementation of a Traffic Management Plan (TMP). The TMP includes measures to minimize traffic disruptions during construction, such as:

- Coordination with LADOT and Caltrans to adjust the signal timing at affected intersections and on- or off-ramps to minimize detoured traffic volumes.
- Maintaining safe traffic flow during construction.
- Posting advance signage to alert drivers and pedestrians of temporary lane reductions, detours, or street closures.

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| | | Additionally, operational traffic impacts were modeled for future conditions in 2031 and 2040. Future operating conditions on the US-101 mainline in 2031 and 2040 are summarized in Draft EIS/SEIR Section 3.3, Table 3.3-14 and Table 3.3-15. Traffic generated by the Project would not have an effect on US-101 operating conditions during the peak hours in 2031 or 2040. Furthermore, proposed infrastructure improvements as well as all proposed roadway intersections and pedestrian connections would be designed and constructed to comply with applicable agency standards and specifications to maximize safety for both motorized and non-motorized forms of transportation.<br><br>Active transportation improvements along Commercial Street are required to be implemented as mitigation to enhance pedestrian and bicycle connectivity and reduce dependency on single-occupant vehicles.<br><br>Metro is committed to working with stakeholders to maintain safe and efficient traffic conditions for all road users. The input received from the Department of California Highway Patrol is valued, and Metro will continue to collaborate with Caltrans and LADOT to ensure all safety concerns are addressed. |
| | **AGE 2-2** | The Build Alternative and Build Alternative Design Option includes active transportation improvements, such as new bicycle lanes along Commercial Street and potentially a dedicated pedestrian/bicycle bridge over US- |

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| | 101. These improvements aim to provide safe, designated pathways for pedestrians and bicyclists, reducing the likelihood of unauthorized access to the freeway.<br><br>Infrastructure such as fencing, barriers, and other deterrents will be incorporated into the design to prevent pedestrians from accessing restricted areas like the US-101 freeway and to mitigate the risk of objects being thrown onto the roadway.<br><br>During construction, a Traffic Management Plan (TMP) will be implemented to address pedestrian and vehicular access and safety during coordination. The TMP includes provisions that require advanced signage, safe detour routes, and collaboration with law enforcement to monitor and manage any safety concerns.<br><br>Metro's continued collaboration with the California Highway Patrol (CHP) and local agencies will support Metro's operational and safety strategies to address increased pedestrian and vehicular traffic while prioritizing safety and minimizing adverse effects on the community and freeway operations. Metro appreciates the input provided in the Draft EIS/SEIR and remains committed to incorporating all safety considerations into the project design and implementation. |

Appendix C

## Notice of Completion & Environmental Document Transmittal

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

**SCH #2016051071**

**Project Title:** Link Union Station
Lead Agency: Los Angeles County Metropolitan Transportation Authority — Contact Person: Carlos J. Montez
Mailing Address: One Gateway Plaza, MS 99-18-2 — Phone: 213.922.2524
City: Los Angeles — Zip: 90012 — County: Los Angeles

**Project Location:** County: Los Angeles — City/Nearest Community: Los Angeles
Cross Streets: Alameda Street, Cesar Chavez Avenue, Commercial Street — Zip Code: 90012
Longitude/Latitude (degrees, minutes and seconds): 118 ° 14.3 ′ 46 ″ N / 34 ° 3 ′ 20.4 ″ W Total Acres:
Assessor's Parcel No.: Multiple — Section: — Twp.: — Range: — Base:
Within 2 Miles: State Hwy #: 101, 5, 10, 110 — Waterways: LA River
Airports: None — Railways: Amtrak/Metrolink/BNSF — Schools: Multiple

**Document Type:**

| CEQA: | | NEPA: | | Other: | |
|---|---|---|---|---|---|
| ☐ NOP | ☐ Draft EIR | ☐ NOI | | ☒ Joint Document | |
| ☐ Early Cons | ☒ Supplement/Subsequent EIR | ☐ EA | | ☐ Final Document | |
| ☐ Neg Dec | (Prior SCH No.) 2016051071 | ☒ Draft EIS | | ☐ Other: | |
| ☐ Mit Neg Dec | Other: | ☐ FONSI | | | |

**Local Action Type:**

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

**Development Type:**

| | | | |
|---|---|---|---|
| ☐ Residential: Units ____ Acres ____ | | ☒ Transportation: | Type Transit Improvement |
| ☐ Office: Sq.ft. ____ Acres ____ | Employees ____ | ☐ Mining: | Mineral ____ |
| ☒ Commercial: Sq.ft. 190,400 Acres ____ | Employees ____ | ☐ Power: | Type ____ MW ____ |
| ☐ Industrial: Sq.ft. ____ Acres ____ | Employees ____ | ☐ Waste Treatment: | Type ____ MGD ____ |
| ☐ Educational: ____ | | ☐ Hazardous Waste: | Type ____ |
| ☐ Recreational: ____ | | ☐ Other: | ____ |
| ☐ Water Facilities: Type ____ MGD ____ | | | |

**Project Issues Discussed in Document:**

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

**Present Land Use/Zoning/General Plan Designation:**
LA Union Station, Alameda District Specific Plan - Commercial and Industrial

**Project Description:** *(please use a separate page if necessary)*
The Link US Project is proposed to address existing capacity constraints at Los Angeles Union Station (LAUS). The Project consists of transforming LAUS from a stub end tracks station into a run-through tracks station by extending ten platform tracks south of LAUS Platforms 2 through 6 that would merge into a minimum of four tracks on the US-101 viaduct and continue south to connect to mainline tracks along the west bank of the Los Angeles River, the replacement of the existing pedestrian passageway under the platforms and tracks with a new expanded passageway, and 10 new run-through tracks for regional/ intercity trains south of LAUS. The Project also includes off-site railroad improvements to BNSF Railway's Malabar Yard in the City of Vernon.

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

Revised 2010

**Reviewing Agencies Checklist**

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

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

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

Starting Date June 21, 2024 Ending Date August 9, 2024

**Lead Agency (Complete if applicable):**

Consulting Firm: HDR
Address: 350 S. Grand Avenue, Suite 2900
City/State/Zip: Los Angeles, CA 90071
Contact: Patrick O'Neill
Phone: 858.712.8313

Applicant: LA County Metropolitan Transportation Authority
Address: One Gateway Plaza, MS 99-18-2
City/State/Zip: Los Angeles, CA 90012
Phone: 213.922.2524

**Signature of Lead Agency Representative:** Carlos J. Montez **Date:** 6/10/24

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

Revised 2010

**Comment Number:** AGE 3

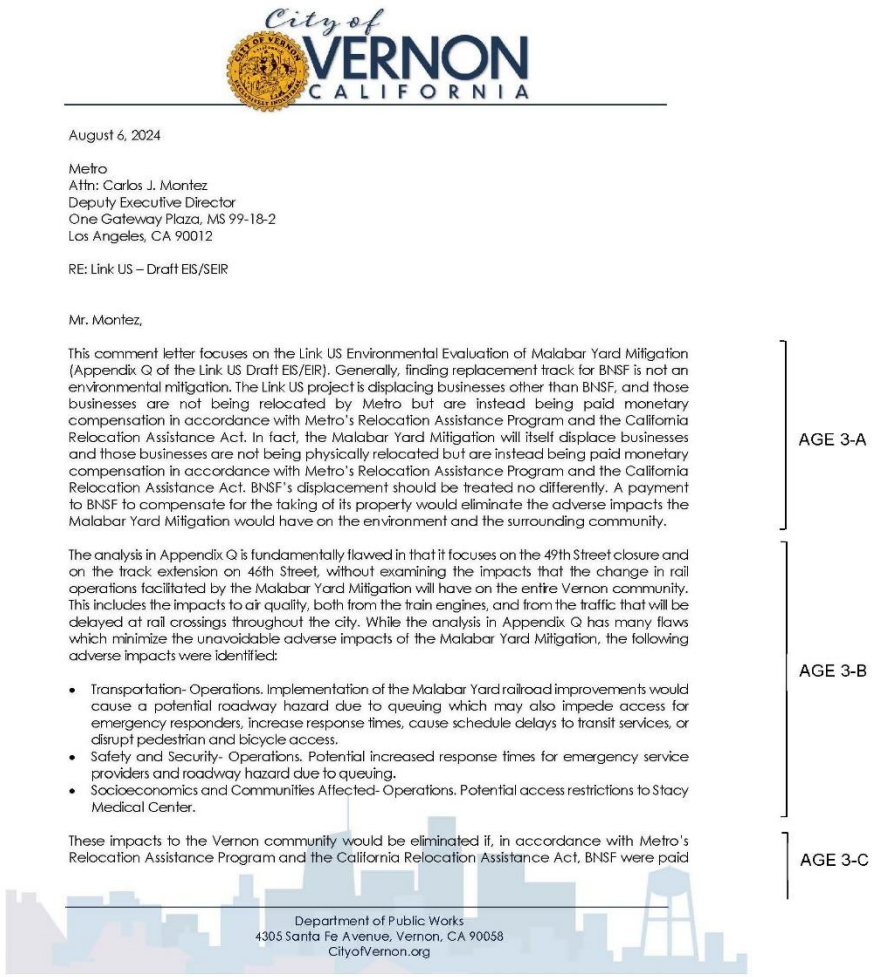
**Name:** Daniel S. Wall, City of Vernon

**Date Received:** 08/06/24

**Format Received:** Email

Attached for consideration are Technical Comments in response to the Metro Link US Draft EIS/SEIR Malabar Yard Mitigation.

**AGE 3 Daniel S. Wall, City of Vernon**



City of VERNON CALIFORNIA

August 6, 2024

Metro
Attn: Carlos J. Montez
Deputy Executive Director
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

RE: Link US – Draft EIS/SEIR

Mr. Montez,

This comment letter focuses on the Link US Environmental Evaluation of Malabar Yard Mitigation (Appendix Q of the Link US Draft EIS/EIR). Generally, finding replacement track for BNSF is not an environmental mitigation. The Link US project is displacing businesses other than BNSF, and those businesses are not being relocated by Metro but are instead being paid monetary compensation in accordance with Metro's Relocation Assistance Program and the California Relocation Assistance Act. In fact, the Malabar Yard Mitigation will itself displace businesses and those businesses are not being physically relocated but are instead being paid monetary compensation in accordance with Metro's Relocation Assistance Program and the California Relocation Assistance Act. BNSF's displacement should be treated no differently. A payment to BNSF to compensate for the taking of its property would eliminate the adverse impacts the Malabar Yard Mitigation would have on the environment and the surrounding community.

AGE 3-A

The analysis in Appendix Q is fundamentally flawed in that it focuses on the 49th Street closure and on the track extension on 46th Street, without examining the impacts that the change in rail operations facilitated by the Malabar Yard Mitigation will have on the entire Vernon community. This includes the impacts to air quality, both from the train engines, and from the traffic that will be delayed at rail crossings throughout the city. While the analysis in Appendix Q has many flaws which minimize the unavoidable adverse impacts of the Malabar Yard Mitigation, the following adverse impacts were identified:

- Transportation- Operations. Implementation of the Malabar Yard railroad improvements would cause a potential roadway hazard due to queuing which may also impede access for emergency responders, increase response times, cause schedule delays to transit services, or disrupt pedestrian and bicycle access.
- Safety and Security- Operations. Potential increased response times for emergency service providers and roadway hazard due to queuing.
- Socioeconomics and Communities Affected- Operations. Potential access restrictions to Stacy Medical Center.

AGE 3-B

These impacts to the Vernon community would be eliminated if, in accordance with Metro's Relocation Assistance Program and the California Relocation Assistance Act, BNSF were paid

AGE 3-C

Department of Public Works
4305 Santa Fe Avenue, Vernon, CA 90058
CityofVernon.org

**AGE 3-A** The purpose for implementing Malabar Yard railroad improvements is to comply with NEPA and CEQA's requirement to mitigate the Project's adverse effects resulting from permanent loss of approximately 5,500 feet of freight storage track capacity (40 CFR 1502.14(f), 40 CFR 1502.16(h); CEQA Guidelines §15126.4(a)). A project's impact on freight is an environmental topic required for consideration in an EIS using FRAs Environmental Procedures.

Mitigation Measure TR-3 would minimize the adverse effect by offsetting the loss of storage tracks at the BNSF West Bank Yard. Impacts to the BNSF West Bank Yard are different than a typical brick and mortar commercial/industrial business because the BNSF West Bank Yard is along the National Good Movement corridor and provides space for critical freight operations that support local, state, and national commerce. Project-related effects on freight would result in loss of storage track capacity that would create operational inefficiencies or increased congestion on the shared passenger/freight rail network in the region. The removal of storage tracks at the BNSF West Bank Yard is considered an adverse effect that requires mitigation, whereas impacts to brick and mortar commercial/industrial businesses are addressed via Metro's Relocation Assistance Program and the Uniform Relocation Act. Draft EIS/SEIR Section 3.3, Page 3.3-69 states:

> *A loss of 5,500 feet of storage track capacity at the BNSF West Bank Yard*

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| | *that would occur during construction and remain throughout operations would have the potential to indirectly affect operations at other freight railyards (BNSF Hobart/Commerce Intermodal Yards) by reducing the maximum storage track length available for singular train movements between the BNSF West Bank Yard and the BNSF Hobart/Commerce Intermodal Yards. Without mitigation, the reduced storage track capacity would necessitate a double movement to transfer longer intermodal trainsets, which may range up to approximately 8,000 or 9,000 feet long. This would potentially create increased emissions and traffic queuing/delay as freight trains may be required to occupy the San Bernardino Subdivision, shared by passenger and freight trains, for an increased period of time.*<br><br>As detailed in Final EIS Appendix Q, Section 1.1, two criteria were used to evaluate potential sites to offset the loss in storage track capacity. The first criteria being location – sites must be in proximity to, and west of, BNSF Hobart/Commerce Intermodal Yards as this is necessary to not impact freight and passenger operations on the BNSF San Bernardino main line tracks. The second criteria aligns with the ability to replace lost storage capacity in kind or preserve the current levels of freight rail operations – in accordance with the provisions of the Link US Purpose and Need. Malabar Yard is the only site that meets both criteria and BNSF's operational requirements so that the current levels of freight operations are preserved. |

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| | Malabar Yard is the only site considered that meets operational requirements to support national goods movement and has sufficient space.<br><br>The comment regarding compensatory payment to BNSF as an alternative to physical relocation is noted. However, such an approach would not address the operational requirements critical to BNSF's function and the broader freight transportation network that facilitates regional, statewide, and national goods movement. The unique nature of rail operations necessitates a solution that goes beyond financial compensation, as operational continuity for BNSF is vital for efficient freight logistics and goods movement.<br><br>The need for Malabar Yard railroad improvements stems from the operational nature of BNSF's rail infrastructure and are integral to preserving current levels of freight rail operations in accordance with the provisions of the purpose and need of the Link US Project. Paying BNSF monetary compensation to remove storage tracks at the BNSF West Bank Yard, rather than offsetting the adverse effect on freight with mitigation, would not preserve current levels of freight operations. BNSF's operations involve critical rail infrastructure and impacts on freight facilities require physical infrastructure improvements to mitigate Project-related adverse effects. |

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| | **AGE 3-B** The environmental evaluation in Draft EIS/SEIR Appendix Q was prepared to provide a focused analysis of the two major project components using the appropriate technical methodologies and an industry-standard approach to performing a reasonable and conservative level of impact evaluation to determine potential adverse effects. The unavoidable adverse effect related to Transportation, Safety and Security, and Socioeconomics and Communities Affected summarized by the commenter aligns with the conservative impact conclusions for these topic areas that were disclosed in the Draft EIS/SEIR.<br><br>The responses below address the comments related to freight railroad operations, mitigation measures to reduce Project-related traffic delays, air quality, queuing and the roadway hazard identified at Seville Avenue and 46th Street, life safety and emergency response, and access to the Stacy Medical Center.<br><br>• Freight Railroad Operations - Key Issue Response #2 includes clarifications to the information presented in the Draft EIS/SEIR Appendix Q Section 2 regarding freight railroad operations. All of the information and analysis of typical freight railroad operational patterns, and the conclusions in the Draft EIS/SEIR are based on a combination of historical data, stakeholder input, and expert analysis. The information collected from BNSF as it relates to the affected train routes, train lengths, consolidated freight operations, and reduced train |

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| | frequencies is summarized in Key Issue Response #2. As shown in Table 2 of Key Issue Response #2, 8 daily train movements occur on the affected routes considered (Figure 7), and in the future condition, a total of 4.85 daily train movements would occur on these same affected routes (Figure 8). As shown in Table 2, the total daily frequency of train movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night. Figures 7 and 8 depict the existing and future daily train movements on the affected routes.<br><br>• Vehicle Idling and Local Air Pollution - Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Final EIS Appendix Q Section 3.5, Section 3.5.4. The beneficial indirect effect of the Malabar Yard railroad |

improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:

> Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.

- Queuing at Railroad Crossings - As presented in the Draft EIS/SEIR Appendix Q Section 3.3, Page 3.3-10 and in Key Issue Response #2, a queuing analysis was prepared at six locations in response to stakeholder engagement activities to determine whether the existing travel lane storage capacity is adequate to accommodate the queue formations generated from redistributed traffic. The results of the queuing analysis demonstrate for the Opening Year (2024), no increase to the queue formation would be attributable to the Malabar Yard railroad improvements with exception of northbound through movements at Railroad Crossing #4 where there is 20 feet of incremental

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| | addition to the existing queuing that already occurs. The increase in queue formation is not considered a substantial change for two main reasons: 1) the additional 20 feet of queue formation translates into less than a vehicle of queue since one vehicle queue is 25 feet; and 2) because the added queue can be adequately accommodated with the current configuration of the roadway and it would take only one cycle of phasing to clear out the additional 20 feet of incremental addition to the existing queuing that already occurs without the need for any further improvements in lane configuration.<br><br>• Roadway Hazard at Seville Avenue and 46th Street - Key Issue Response #2 notes that a new railroad crossing at the intersection of Seville Avenue and 46th Street could cause southbound vehicular traffic to extend across 46th Street. While blocking an intersection is not a legal vehicular maneuver and queuing is not an LOS related traffic impact that constitutes a significant impact/adverse effect under CEQA/NEPA, the increase in queue at this location may introduce a potential roadway hazard. Malabar Yard Mitigation Measure TR-6 minimizes the potential roadway hazard as effectively as possible because it requires roadway design, railroad safety devices, and accessibility to be coordinated with the City of Vernon and CPUC. Potential roadway safety devices that may be considered for future implementation (Malabar Yard Mitigation Measure TR-6) include queue cutter traffic signals or |

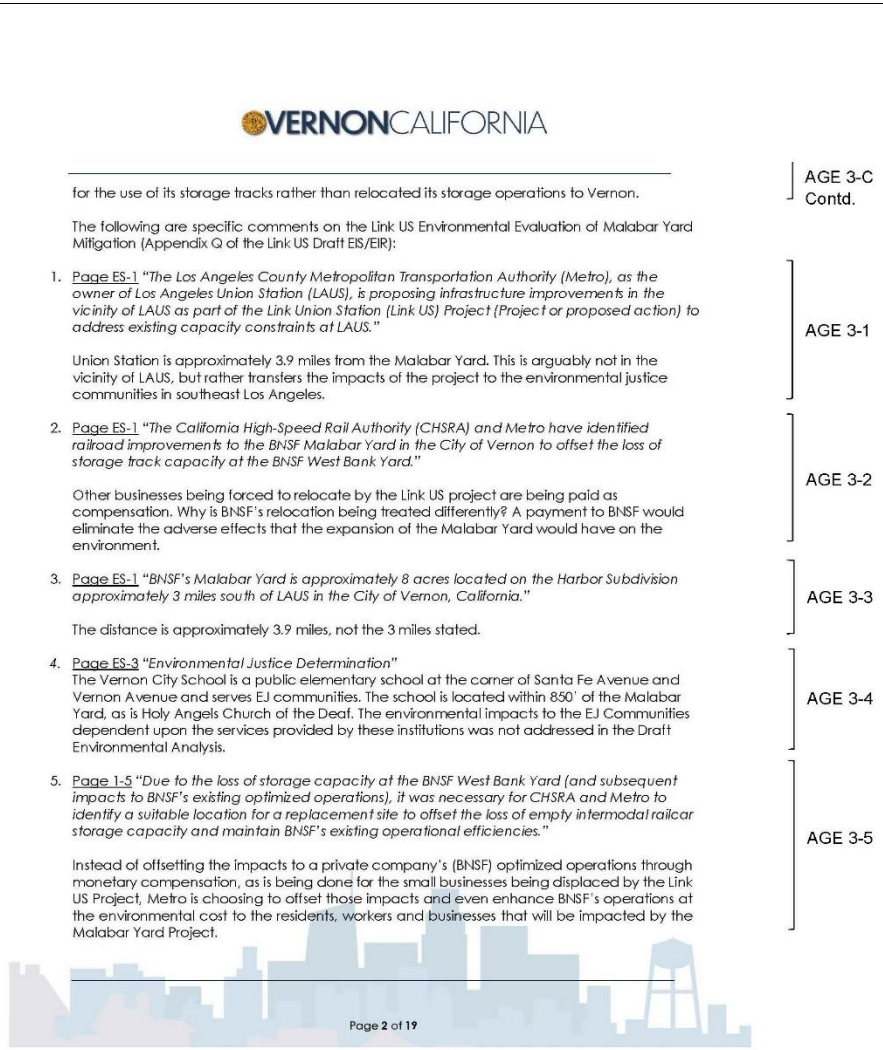
pre-signals for the new railroad crossing on Seville Avenue.

As discussed in Appendix Q Section 3.14, Page 3.14-23, all Malabar Yard railroad improvements would be designed and constructed to comply with FRA and CPUC standards and specifications to maximize safety for both motorized and non-motorized forms of transportation.

- Life Safety and Emergency Response - Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis

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| | performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future).<br>• Access to Stacy Medical Center - Based on the queuing analysis performed and in response to property owner questions raised in January 2025, Metro conducted a calculation to determine the percentage of time in a 24-hour period that the four additional train movements per day (and the two existing trains movements) may block access to a driveway on 46th Street, which can also be used to demonstrate the overall percentage of time trains may operate across the driveway serving Stacy Medical Center. The calculation assumes 6 train movements per day, with a 3,000-foot train plus 500 feet on either end for gate activation and clearing, traveling at 10 miles per hour, and demonstrates that trains would operate across Stacy Medical Center approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Based on consideration of context and intensity, |

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| | operation of trains on the 46th Street Connector would not cause a safety hazard as it relates to access to Stacy Medical Center. |
| | **AGE 3-C** As discussed in Comment AGE 3-A response, paying BNSF monetary compensation to remove storage tracks at the BNSF West Bank Yard rather than mitigating Project-related effects with physical infrastructure improvements would not preserve current levels of freight rail operations in accordance with the provisions of the purpose and need of the Link US Project. |



VERNONCALIFORNIA

for the use of its storage tracks rather than relocated its storage operations to Vernon. AGE 3-C Contd.

The following are specific comments on the Link US Environmental Evaluation of Malabar Yard Mitigation (Appendix Q of the Link US Draft EIS/EIR):

1. Page ES-1 *"The Los Angeles County Metropolitan Transportation Authority (Metro), as the owner of Los Angeles Union Station (LAUS), is proposing infrastructure improvements in the vicinity of LAUS as part of the Link Union Station (Link US) Project (Project or proposed action) to address existing capacity constraints at LAUS."* AGE 3-1

   Union Station is approximately 3.9 miles from the Malabar Yard. This is arguably not in the vicinity of LAUS, but rather transfers the impacts of the project to the environmental justice communities in southeast Los Angeles.

2. Page ES-1 *"The California High-Speed Rail Authority (CHSRA) and Metro have identified railroad improvements to the BNSF Malabar Yard in the City of Vernon to offset the loss of storage track capacity at the BNSF West Bank Yard."* AGE 3-2

   Other businesses being forced to relocate by the Link US project are being paid as compensation. Why is BNSF's relocation being treated differently? A payment to BNSF would eliminate the adverse effects that the expansion of the Malabar Yard would have on the environment.

3. Page ES-1 *"BNSF's Malabar Yard is approximately 8 acres located on the Harbor Subdivision approximately 3 miles south of LAUS in the City of Vernon, California."* AGE 3-3

   The distance is approximately 3.9 miles, not the 3 miles stated.

4. Page ES-3 *"Environmental Justice Determination"*
   The Vernon City School is a public elementary school at the corner of Santa Fe Avenue and Vernon Avenue and serves EJ communities. The school is located within 850' of the Malabar Yard, as is Holy Angels Church of the Deaf. The environmental impacts to the EJ Communities dependent upon the services provided by these institutions was not addressed in the Draft Environmental Analysis. AGE 3-4

5. Page 1-5 *"Due to the loss of storage capacity at the BNSF West Bank Yard (and subsequent impacts to BNSF's existing optimized operations), it was necessary for CHSRA and Metro to identify a suitable location for a replacement site to offset the loss of empty intermodal railcar storage capacity and maintain BNSF's existing operational efficiencies."* AGE 3-5

   Instead of offsetting the impacts to a private company's (BNSF) optimized operations through monetary compensation, as is being done for the small businesses being displaced by the Link US Project, Metro is choosing to offset those impacts and even enhance BNSF's operations at the environmental cost to the residents, workers and businesses that will be impacted by the Malabar Yard Project.

Page 2 of 19

**AGE 3-1** The Final EIS Appendix Q Executive Summary and Appendix Q Chapter 1.0, Section 1.1.1 have been revised to clarify the distance between LAUS and Malabar Yard as follows:

> BNSF's Malabar Yard is approximately 8 acres located on the Harbor Subdivision approximately 3.9 miles south of LAUS in the City of Vernon, California.

While LAUS and Malabar Yard are approximately 3.9 miles apart, the term "vicinity" in the context of the Link US Project refers to the broader area where infrastructure improvements are required to address existing capacity constraints and facilitate the Project's objectives. The improvements at Malabar Yard are integral to supporting the overall functionality and efficiency of the transportation system connected to LAUS.

Metro does not intend to transfer project impacts to minority and/or low-income communities in southeast Los Angeles, and Draft EIS/SEIR Appendix Q Section 1.1 shows that Metro considered multiple locations to offset the permanent loss of freight rail storage track capacity at BNSF West Bank Yard. Based on the screening and evaluation process undertaken, Malabar Yard is the only site that meets the selection criteria for the replacement sites considered (Draft EIS/SEIR Appendix Q, Tables 1-1 and 1-2). The alternative sites considered to offset the impacts that would occur to the

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| | BNSF West Bank Yard are outlined in Draft EIS/SEIR Appendix Q Section 1.1.1.<br><br>During preparation of the Final EIS, after the close of the 45-day public comment period, at the request of the City of Vernon, Vernon Chamber of Commerce, and Los Angeles County Supervisor Hahn's office, additional analysis was conducted to determine if replacement of BNSF storage tracks could be implemented at BNSF's Hobart Yard facility or BNSF's Los Angeles Junction facility; thereby no longer necessitating the 49th Street Closure as part of the Link US Project. A summary of the determinations with regards to the alternative sites considered in the Final EIS is below:<br><br>• BNSF Hobart Yard - After coordinating with BNSF and CHSRA, it was determined that mitigating the Link US Project permanent impacts to BNSF storage tracks at BNSF's Hobart Yard is not feasible because the land area proposed for acquisition as part of CHSRA's Los Angeles to Anaheim Project Section of the planned HSR system (approx. 40 acres) adjacent to the existing BNSF Hobart Yard is planned for CHSRA and BNSF improvements separate from the Link US Project mitigation requirements. Specifically, on May 16, 2024, the CHSRA Board of Directors approved study of the Hobart Yard as part of the preferred alternative for the Los Angeles to Anaheim Project Section. For the Link US Project, this assumption is consistent with the assumptions applicable to the |

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| | Los Angeles to Anaheim Project Section of the planned HSR system.<br><br>• BNSF Los Angeles Junction Facility - As shown in Final EIS Appendix Q, Section 1.1.1, Figure 1-3, expansion of the Los Angeles Junction to accommodate additional storage tracks would require full parcel acquisition of seven private properties with active businesses/buildings located onsite. These property impacts would be greater in magnitude than the effects associated with the Malabar Yard railroad improvements.<br><br>Furthermore, as identified in Final EIS Appendix Q Section 3.16, the determination of whether the effects of the Malabar Yard railroad improvements are disproportionate and adverse depends on whether 1) the effects of the Malabar Yard railroad improvements would be borne predominantly by a minority and/or low-income community; or 2) the effects of the Malabar Yard railroad improvements would be appreciably more severe or greater in magnitude on a minority and/or low-income community than the effects on a non-minority and/or non-low-income community.<br><br>The determination considers the totality of the locations of adverse effects relative to minority communities, the severity of the adverse effect and the success of proposed mitigation in reducing the effect, whether mitigation measures reduce effects equally for both minority communities and non-minority communities, and the benefits |

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| | that minority communities would receive. Overall, both minority communities and non-minority communities in the City of Vernon would benefit from reduced daily train movements throughout the community, which has other corresponding benefits related to air quality (reduced train emissions – see Key Issue Response #3), emergency response (total daily delay reduced by 5.35 minutes per day – see Key Issue Response #4), and noise and vibration.<br><br>A community analysis of the Malabar Yard railroad improvements is presented in Final EIS Appendix Q Section 3.16. The section analyzes the potential disproportionate and adverse effects on minority, low-income, and non-minority communities within the defined community analysis study area, based on the impacts identified in Final EIS Appendix Q Sections 3.2 through 3.15. Beneficial effects are also disclosed in Final EIS Appendix Q Section 3.16, and are summarized below:<br><br>• Regional air quality benefits by allowing for the separation of freight and passenger trains operating on the San Bernardino line. With less interference between freight and passenger trains, operational efficiencies would result in less idling and a reduction in train miles and truck VMT.<br><br>• Reduction in emissions by shifting some freight rail activity away from the minority and/or low-income community west of Malabar Yard and facilitating fewer train movements along the Harbor Subdivision north of Malabar Yard. |

- New safety enhancements, including arms, flashers, raised medians, and driveway gates at grade rail crossings, as well as the closure of one at grade rail crossing.
- On 46th Avenue, expanded curbs, sidewalks, traffic signals, center medians, and restriping would improve pedestrian and vehicular mobility and safety.
- During construction, up to 143 and 151 temporary jobs are anticipated to be generated, along with $9.4 to $9.7 million in labor income, and $3.3 to $3.5 million in total federal, state, and local tax revenues generated.

As discussed above, the long-term, regionwide reduction in emissions is a beneficial effect as disclosed in the Final EIS Appendix Q Section 3.5, Section 3.5.4. In addition to the regional air quality benefits, from a localized perspective, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard. The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:

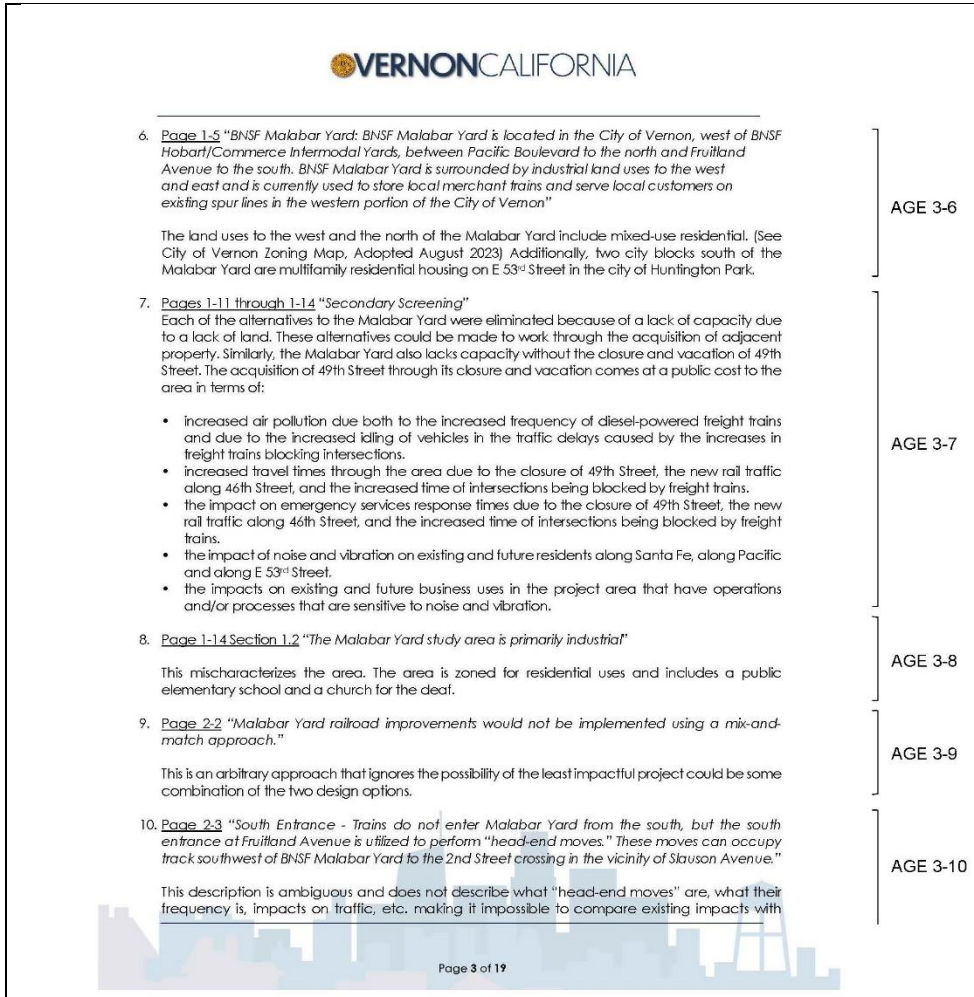
Additionally, fewer trains would be traveling along the portion of the Harbor

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| | Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>It was concluded within Final EIS Appendix Q Section 3.16 that potential impacts associated with Malabar Yard railroad improvements would not result in disproportionate or adverse impacts on minority, low-income, and non-minority communities with the implementation of mitigation, as fully described in Final EIS Appendix Q Section 3.16.<br><br>In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Final EIS. These measures are incorporated in the Final EIS as Offsetting Mitigation Measures (OMMs). The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration |

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| | | impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis. |
| | **AGE 3-2** | Please refer to Comment AGE 3-A response for a discussion of the purpose of the Malabar Yard railroad improvements. As discussed in Comment AGE 3-A response, paying BNSF monetary compensation to remove storage tracks at the BNSF West Bank Yard rather than mitigating Project-related effects with physical infrastructure improvements would not preserve current levels of freight rail operations in accordance with the provisions of the purpose and need of the Link US Project. |
| | **AGE 3-3** | The Final EIS Appendix Q Executive Summary and Appendix Q Chapter 1.0, Section 1.1.1 have been revised to clarify the distance between LAUS and Malabar Yard as follows:<br><br><u>BNSF's Malabar Yard is approximately 8 acres located on the Harbor Subdivision approximately 3.9 miles south of LAUS in the City of Vernon, California.</u> |
| | **AGE 3-4** | As shown in Final EIS Appendix Q Section 3.16, Figure 3.16-1, the boundary of Census Tract 9800.16, that includes Vernon City School and Holy Angels Church of the Deaf, was used as the Community Analysis Study Area to consider potential impacts on minority communities. Vernon City School does serve minority communities as the City of Vernon is a minority community. |

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| | As presented in Final EIS Appendix Q Section 3.5, Page 3.5-21 within the Malabar Yard Study Area, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard. As explained in the Comment AGE 3-A response and in the Introduction to Volume III of the Final EIS (Key Issue Response #2), this is due to the consolidation of freight rail service that is facilitated by the 46th Street Connector. A reduction of 3.15 train movements per day throughout the City would affect the entire Vernon community. This has corresponding benefits within the entire city, which was considered as a minority community.<br><br>In addition, as discussed above in Comment AGE 3-1 response, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Final EIS. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration |

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| | | impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis. These community improvements would also have corresponding benefits to Vernon City School and the Holy Angels Church of the Deaf. |
| | **AGE 3-5** | Metro recognizes the differences in addressing impacts to various stakeholders, including small businesses and BNSF. Please refer to Comment AGE 3-A response for a discussion of the purpose of the Malabar Yard railroad improvements. As discussed in Comment AGE 3-A response, paying BNSF monetary compensation to remove storage tracks at the BNSF West Bank Yard rather than mitigating Project-related effects with physical infrastructure improvements would not preserve current levels of freight rail operations in accordance with the provisions of the purpose and need of the Link US Project. |



VERNONCALIFORNIA

6. Page 1-5 "*BNSF Malabar Yard: BNSF Malabar Yard is located in the City of Vernon, west of BNSF Hobart/Commerce Intermodal Yards, between Pacific Boulevard to the north and Fruitland Avenue to the south. BNSF Malabar Yard is surrounded by industrial land uses to the west and east and is currently used to store local merchant trains and serve local customers on existing spur lines in the western portion of the City of Vernon*"

   The land uses to the west and the north of the Malabar Yard include mixed-use residential. (See City of Vernon Zoning Map, Adopted August 2023) Additionally, two city blocks south of the Malabar Yard are multifamily residential housing on E 53rd Street in the city of Huntington Park.

AGE 3-6

7. Pages 1-11 through 1-14 "*Secondary Screening*"
   Each of the alternatives to the Malabar Yard were eliminated because of a lack of capacity due to a lack of land. These alternatives could be made to work through the acquisition of adjacent property. Similarly, the Malabar Yard also lacks capacity without the closure and vacation of 49th Street. The acquisition of 49th Street through its closure and vacation comes at a public cost to the area in terms of:

   - increased air pollution due both to the increased frequency of diesel-powered freight trains and due to the increased idling of vehicles in the traffic delays caused by the increases in freight trains blocking intersections.
   - increased travel times through the area due to the closure of 49th Street, the new rail traffic along 46th Street, and the increased time of intersections being blocked by freight trains.
   - the impact on emergency services response times due to the closure of 49th Street, the new rail traffic along 46th Street, and the increased time of intersections being blocked by freight trains.
   - the impact of noise and vibration on existing and future residents along Santa Fe, along Pacific and along E 53rd Street.
   - the impacts on existing and future business uses in the project area that have operations and/or processes that are sensitive to noise and vibration.

AGE 3-7

8. Page 1-14 Section 1.2 "*The Malabar Yard study area is primarily industrial*"

   This mischaracterizes the area. The area is zoned for residential uses and includes a public elementary school and a church for the deaf.

AGE 3-8

9. Page 2-2 "*Malabar Yard railroad improvements would not be implemented using a mix-and-match approach.*"

   This is an arbitrary approach that ignores the possibility of the least impactful project could be some combination of the two design options.

AGE 3-9

10. Page 2-3 "*South Entrance - Trains do not enter Malabar Yard from the south, but the south entrance at Fruitland Avenue is utilized to perform "head-end moves." These moves can occupy track southwest of BNSF Malabar Yard to the 2nd Street crossing in the vicinity of Slauson Avenue.*"

    This description is ambiguous and does not describe what "head-end moves" are, what their frequency is, impacts on traffic, etc. making it impossible to compare existing impacts with

AGE 3-10

Page 3 of 19

**AGE 3-6** The narrative in Final EIS Appendix Q, Page 1-5, provides a brief overview of the existing roadways and developed land uses surrounding Malabar Yard at the time the analysis was conducted. The narrative focused on the immediate area and does not discuss developments outside of the immediate area surrounding Malabar Yard, current zoning classifications, or the General Plan land use designations for properties in the vicinity of Malabar Yard that are planned for mixed-use residential based on the *2023 Vernon Westside Zone Change and General Plan Amendment*, adopted by the City of Vernon in 2023.

Although not specifically described on Page 1-5, the multifamily residential housing on East 53rd Street in the City of Huntington Park were considered in the environmental evaluation. As shown in Final EIS Appendix Q Section 3.5, Figure 3.5-1, these residential units are identified as sensitive receptors closest to the Malabar Yard railroad improvements.

**AGE 3-7** As discussed in Final EIS Appendix Q Section 1.1, Page 1-9, a two-step evaluation process was used to identify potential replacement sites for the loss of storage tracks that would result at the BNSF West Bank Yard. The alternatives analysis process was completed to eliminate sites that do not meet the identified screening criteria to preserve the current levels of freight rail operations.

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| | During preparation of the Final EIS, after the close of the 45-day public comment period, at the request of the City of Vernon, Vernon Chamber of Commerce, and Los Angeles County Supervisor Hahn's office, additional analysis was conducted to determine if replacement of BNSF storage tracks could be implemented at BNSF's Hobart Yard facility or BNSF's Los Angeles Junction facility; thereby no longer necessitating the 49th Street Closure as part of the Link US Project. A summary of the determinations with regards to the alternative sites considered in the Final EIS is below:<br>• BNSF Hobart Yard - After coordinating with BNSF and CHSRA, it was determined that mitigating the Link US Project permanent impacts to BNSF storage tracks at BNSF's Hobart Yard is not feasible because the land area proposed for acquisition as part of CHSRA's Los Angeles to Anaheim Project Section of the planned HSR system (approx. 40 acres) adjacent to the existing BNSF Hobart Yard is planned for CHSRA and BNSF improvements separate from the Link US Project mitigation requirements. Specifically, on May 16, 2024, the CHSRA Board of Directors approved study of the Hobart Yard as part of the preferred alternative for the Los Angeles to Anaheim Project Section. For the Link US Project, this assumption is consistent with the assumptions applicable to the Los Angeles to Anaheim Project Section of the planned HSR system. |

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| | • BNSF Los Angeles Junction Facility - As shown in Final EIS Appendix Q, Section 1.1.1, Figure 1-3, expansion of the Los Angeles Junction to accommodate additional storage tracks would require full parcel acquisition of seven private properties with active businesses/buildings located onsite. These property impacts would be greater in magnitude than the effects associated with the Malabar Yard railroad improvements.<br><br>Please also refer to the Comment AGE 3-A response for a discussion why BNSF could not be compensated via Metro's Relocation Assistance Program/ Uniform Relocation Act as with other brick and mortar buildings.<br><br>Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements during construction and operation and develop solutions that preserve the city's economic vitality and connectivity to the extent feasible.<br><br>The Final EIS concluded that, overall, the Malabar Yard railroad improvements would benefit Vernon by decreasing train movements throughout the City. The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service from Los Angeles Junction; thereby reducing daily train movements on the Harbor Subdivision railroad tracks leading in and out of Malabar Yard. Daily train movements on the Harbor |

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| | Subdivision would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Final EIS Appendix Q Table 2-1 and in the clarification of rail operations information in Volume III Introduction). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent less train movements on the Harbor Subdivision coming from/to the San Bernardino Subdivision.<br><br>The responses below address the comments related to air pollution, traffic delays, life safety and emergency response, and noise and vibration, and operational/physical impacts to businesses.<br><br>• Air Pollution - Malabar Yard railroad improvements would not cause adverse air quality impacts because there would be fewer diesel train movements and vehicle idling emissions would be minimal. The Malabar Yard railroad improvements do not cause or contribute to high traffic volumes or add any additional diesel vehicles to local roadways, nor would traffic delay worsen (refer to Key Issue Response #3).<br><br>• Traffic Delay - In regard to traffic delays, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/ Santa Fe Avenue - construction, Santa Fe Avenue/ Pacific Boulevard – construction and operations, Pacific Boulevard/ Fruitland Avenue - |

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| | operations, and Fruitland Avenue - operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, increased travel times are not expected to occur.<br><br>• Life Safety and Emergency Response - Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis |

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| | performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers.<br><br>• Noise and Vibration - No noise and vibration-sensitive land uses occur within the applicable screening distances used to consider direct or indirect noise and vibration effects.<br><br>Based on the stakeholder engagement performed to date, no potentially affected properties have operations or processes that are considered noise and vibration sensitive (see Final EIS Appendix Q, Section 3.6.3). To assess potential impacts from noise sources, a noise screening level assessment was conducted and for noise-sensitive land uses within 1,000 and 650-foot screening distances. Noise sensitive |

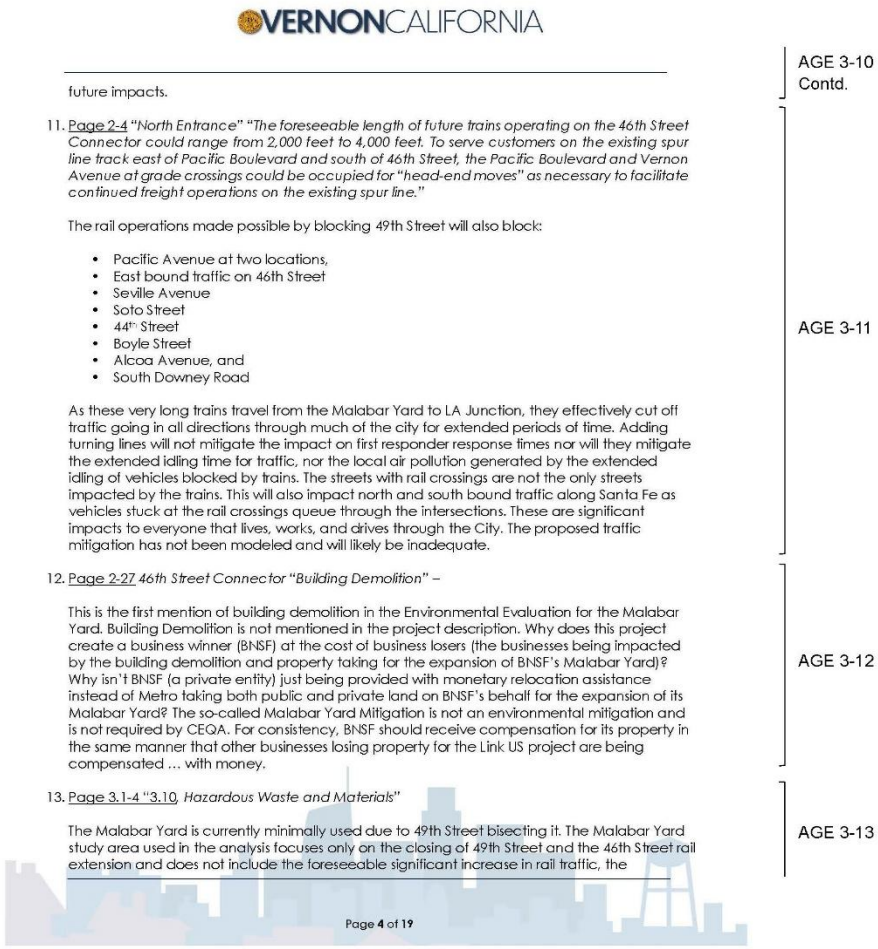
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| | land uses beyond these specified distances are not expected to suffer any adverse noise effects; therefore, no further analysis of noise-sensitive land uses outside of these buffers is warranted. The noise and vibration analysis performed for the Malabar Yard railroad improvements meets all applicable requirements for the type of infrastructure improvements proposed.<br><br>• Operational and Physical Impacts to Businesses - As discussed in Key Issue Response #5, some job loss resulting from potential building demolition may occur; however, as part of Metro's Relocation Assistance Program and the Uniform Relocation Act benefits processes, any businesses subject to building demolition or displacement would be compensated or referred to potential and/or suitable replacement sites.<br><br>Parking impacts may occur, and when considering both context (total spaces available) and intensity (number of spaces removed), no adverse effect would occur because the properties would still be usable. Metro and BNSF will coordinate with the City of Vernon to identify opportunities for long-term parking solutions to offset loss of parking that may occur upon implementation of the Malabar Yard railroad improvements. Given the discretionary authority of the Public Works Director and allowance to provide substitute parking spaces under Section 17.56.50 of the Comprehensive Zoning Ordinance, Metro expects that it |

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| | can identify parking solutions that would not conflict with the ordinance, and therefore, the loss of parking will not cause an adverse effect.<br><br>Operational and physical impacts to businesses would be minimized by implementing Design Option 2, as the preferred design option, at both locations. The comments provided on the Final EIS with regards to impacts on businesses in the City of Vernon have been taken into consideration and coordination with the City of Vernon and business stakeholders will be ongoing to minimize the extent of impacts during construction and operation. |
| | **AGE 3-8** As shown in Final EIS Appendix Q, Chapter 1.0, Page 1-19, the text is intended to describe the existing condition, not what the current zoning designations are or planned land uses are based on the *2023 Vernon Westside Zone Change and General Plan Amendment*. The word primarily is accurate due to the heavy presence of industrial land uses in the current condition.<br><br>Please refer to Key Issue Response #6 for a discussion of the land use and planning analysis related to existing and future land uses related to the *2023 Vernon Westside Zone Change and General Plan Amendment*. As discussed in that response, the *2023 Vernon Westside Zone Change and General Plan Amendment* (adopted July 2023) was not considered in the Final EIS environmental evaluation because the zone change and amendment was not formally adopted at the time the Revised NOI was |

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| | issued in September 2020. As required by 40 C.F.R. 1502.16(c), Metro performed a consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023) for inclusion in the Final EIS. Based on the analysis performed in the Final EIS Volume III Introduction Table 5, the Malabar Yard railroad improvements were determined to be consistent with the goals and policies within the *2023 Vernon Westside Zone Change and General Plan Amendment*. Therefore, no conflict would occur with the implementation of Malabar Yard railroad improvements.<br><br>The Malabar Yard railroad improvements would facilitate the consolidation of freight service in the city from Los Angeles Junction; thereby reducing the total daily train movements on the Harbor Subdivision parallel to Santa Fe Avenue where future mixed-use development is planned. This reduction of train movements would result in a benefit of localized air emissions and noise and vibration reductions to nearby sensitive receptors that are currently present, in addition to future sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Final EIS. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential |

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| | | impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. |
| | **AGE 3-9** | Design Option 2 at 49th Street (Hammerhead) and Design Option 2 at 46th Street (Northern Alignment) are the least impactful design options considered. The Design Option 2 improvement plans at both locations (46th Street and 49th Street) were developed based on the substantial feedback received from affected property owners. The Design Option 2 configurations reduce potential adverse effects related to ingress/egress and truck circulation, building impacts, and changes to parking and access. The DEIS/SEIR included an evaluation of both design options as a reasonable range of alternatives considered at both locations; however, Design Option 2 at both locations were considered together at both locations and not independent of each other. This was the reasoning behind inclusion of the statements related to "no mix and match". Given the reduced impacts of Design Option 2 at both locations, Design Option 2 is the preferred design option. |

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| | **AGE 3-10** "Head-end moves" is a term used to describe when a freight train uses an adjacent track in an opposite direction of travel to maneuver onto another track. As an example, on Figure 7 and 8 of the Final EIS Volume III, Introduction, the train operating on the affected route titled "West Seville" maneuvers on the tracks north of Malabar Yard to enter the tracks on the spur line east of Pacific Boulevard.<br><br>For context, trains operating within the Malabar Yard area sometimes need to reposition train car configurations when dropping off train cars or adding train cars stored at Malabar Yard. During these operations, the track on which a train is operating on can be occupied with train cars southwest of the BNSF Malabar Yard to the 2nd Street crossing in the vicinity of Slauson Avenue. The operational maneuvering of these train cars is not considered separate from the existing and future train movements discussed in Final EIS Appendix Q Section 2.2. In other words, when head-end moves are made to maneuver trains, these are not counted as separate train movements.<br><br>Final EIS Volume III Introduction (Key Issue Response #2) includes clarification to the information presented in the Final EIS related to the train movements and the length of trains in the existing and future conditions. |



VERNONCALIFORNIA

future impacts.

11. Page 2-4 *"North Entrance" "The foreseeable length of future trains operating on the 46th Street Connector could range from 2,000 feet to 4,000 feet. To serve customers on the existing spur line track east of Pacific Boulevard and south of 46th Street, the Pacific Boulevard and Vernon Avenue at grade crossings could be occupied for "head-end moves" as necessary to facilitate continued freight operations on the existing spur line."*

The rail operations made possible by blocking 49th Street will also block:

- Pacific Avenue at two locations,
- East bound traffic on 46th Street
- Seville Avenue
- Soto Street
- 44th Street
- Boyle Street
- Alcoa Avenue, and
- South Downey Road

As these very long trains travel from the Malabar Yard to LA Junction, they effectively cut off traffic going in all directions through much of the city for extended periods of time. Adding turning lines will not mitigate the impact on first responder response times nor will they mitigate the extended idling time for traffic, nor the local air pollution generated by the extended idling of vehicles blocked by trains. The streets with rail crossings are not the only streets impacted by the trains. This will also impact north and south bound traffic along Santa Fe as vehicles stuck at the rail crossings queue through the intersections. These are significant impacts to everyone that lives, works, and drives through the City. The proposed traffic mitigation has not been modeled and will likely be inadequate.

12. Page 2-27 *46th Street Connector "Building Demolition" –*

This is the first mention of building demolition in the Environmental Evaluation for the Malabar Yard. Building Demolition is not mentioned in the project description. Why does this project create a business winner (BNSF) at the cost of business losers (the businesses being impacted by the building demolition and property taking for the expansion of BNSF's Malabar Yard)? Why isn't BNSF (a private entity) just being provided with monetary relocation assistance instead of Metro taking both public and private land on BNSF's behalf for the expansion of its Malabar Yard? The so-called Malabar Yard Mitigation is not an environmental mitigation and is not required by CEQA. For consistency, BNSF should receive compensation for its property in the same manner that other businesses losing property for the Link US project are being compensated … with money.

13. Page 3.1-4 "3.10, *Hazardous Waste and Materials*"

The Malabar Yard is currently minimally used due to 49th Street bisecting it. The Malabar Yard study area used in the analysis focuses only on the closing of 49th Street and the 46th Street rail extension and does not include the foreseeable significant increase in rail traffic, the

Page 4 of 19

AGE 3-10 Contd.

AGE 3-11

AGE 3-12

AGE 3-13

**AGE 3-11** Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, length of trains which are 3,000 feet in the existing and proposed condition, and the potential queuing associated with implementation of Malabar Yard railroad improvements. The responses below address the comments related to the localized traffic analysis conducted and the intersections and roadway segments considered, mitigation measures to reduce Project-related traffic delays, freight railroad operations, community connectivity, life safety and emergency response.

- Localized Traffic Analysis Conducted/Intersections and Roadway Segments Considered - The Draft EIS/SEIR includes a thorough and comprehensive evaluation of potential adverse effects from implementation of the Malabar Yard railroad improvements, including traffic and transportation effects associated with railroad operations. The anticipated traffic redistribution and change in traffic along with the list of study intersections and roadway segments patterns was coordinated with the City of Vernon to obtain feedback on the approach before the traffic analysis was performed.

As discussed in Key Issue Response #2, due to the Project related redistribution of existing traffic, a localized traffic analysis was conducted for intersections and roadway segments within the proximity to the Malabar

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| | Yard railroad improvements where traffic redistribution is expected to occur. The traffic study area is shown in Final EIS Appendix Q Section 3.3.3, Figure 3.3-1, and demonstrates that traffic impacts at Pacific Boulevard at two locations, 46th Street, Seville Avenue, and Soto Street were all considered to determine if the Malabar Yard railroad improvements would increase traffic delay to a level that would exceed applicable v/c ratio thresholds.<br><br>As discussed in Key Issue Response #2, the traffic study area does not include intersections or roadway segments between Soto Street and the Los Angeles Junction because the Malabar Yard railroad improvements would not generate new traffic trips and would only result in localized redistribution of existing traffic (Final EIS Appendix Q Section 3.3, Page 3.3-9). Trains currently operate across Pacific Boulevard/Vernon Avenue, Pacific Avenue and 46th Street, Seville Avenue, Soto Street, 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road. No operational changes along the East Seville Connection and Hobart Yard/Los Angeles Junction Connection routes would be attributable to the proposed Malabar Yard railroad improvements; therefore, traffic analysis was not conducted at those corresponding intersections.<br><br>For 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road, the four additional train movements that would pass these intersections for BNSF to serve customers on the west side of the City of |

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| | Vernon (Exxon and West Seville), two movements would occur at night (7:30pm to 2:00am) and two movements would occur during the day (6:30am to 2:00pm). Based on the queuing analysis performed and in response to property owner questions raised in January 2025, Metro conducted a calculation to determine the percentage of time in a 24-hour period that the four additional train movements per day (and the two existing trains movements) may block access to a driveway on 46th Street, which can also be used to demonstrate the overall percentage of time trains may block an intersection along the East Seville Connection from Soto Street to the Los Angeles Junction where a detailed traffic evaluation was not conducted (44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road). The calculation assumes 6 train movements per day, with a 3,000-foot train plus 500 feet on either end for gate activation and clearing, traveling at 10 miles per hour, and demonstrates that trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am).<br><br>Based on consideration of context and intensity, no adverse effect would occur related to traffic delay at the railroad crossing intersections from Soto Street to Los Angeles Junction where 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road are located.<br><br>While Metro recognizes BNSF would operate trains outside the traffic study area, the |

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| | existing and future operational scenarios included in the environmental evaluation were focused to the geographic areas where physical modifications to infrastructure improvements or new infrastructure would occur. Indirect impacts were also analyzed per the requirements of 40 C.F.R. 1508.8(b) and CEQA Guidelines Section 15358 since indirect impacts, or secondary impacts, are impacts caused by a project that occur later in time or are farther removed in distance but are still reasonably foreseeable.<br><br>As presented in the Final EIS Appendix Q Section 3.3, Page 3.3-10 and in Key Issue Response #2, a queuing analysis was prepared at six locations in response to stakeholder engagement activities to determine whether the existing travel lane storage capacity is adequate to accommodate the queue formations generated from redistributed traffic. The results of the queuing analysis demonstrate for the Opening Year (2024), no increase to the queue formation would be attributable to the Malabar Yard railroad improvements with exception of northbound through movements at Railroad Crossing #4 where there is 20 feet of incremental addition to the existing queuing that already occurs. The increase in queue formation is not considered a substantial change for two main reasons: 1) the additional 20 feet of queue formation translates into less than a vehicle of queue since one vehicle queue is 25 feet; and 2) because the added queue can be adequately accommodated with the current configuration of the roadway and it would take only one cycle of phasing to clear out |

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| | the additional 20 feet of incremental addition to the existing queuing that already occurs without the need for any further improvements in lane configuration.<br><br>During coordination meetings with the City of Vernon staff after the close of the public comment period, queuing Downey Road was raised as a topic of concern. At Railroad Crossing #6 (Downey Road south of Vernon Avenue), the queue formation already exceeds the storage capacity in the existing condition (Table 3.3-10) and would continue to exceed the storage capacity during the 2024 No-Build scenario. The queue formation on Downey Road south of Vernon Avenue in the northbound through and southbound through direction remains the same during AM and PM peak hours.<br><br>With the Malabar Yard railroad improvements, fewer trains would operate in the City and half of the train movements would occur at night, which have very little to no impact on traffic. For trains operating during the day, if a train movement occurs during the AM and PM peak periods, there could be some effect, but trains are not anticipated to operate at the same time every day and are not all occurring during the AM or PM peak periods. The hourly schedule to service Vernon customers fluctuates and is variable throughout the week based on customer demand.<br><br>In March 2025, Metro facilitated a Community Meeting/Open House in the City of Vernon. Multiple comments were raised by the community regarding the duration of time |

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| | that intersections could be blocked by freight trains. In response to these comments, in April 2025 Metro installed cameras at multiple locations throughout the City to record continuous train activity over the course of a week (April 19–25, 2025), 24-hours per day.<br><br>Applying the video footage collected, Metro performed an intersection delay/blockage analysis to document intersection delay/blockage which would occur in the existing condition and with implementation of the Malabar Yard railroad improvements. Metro presented the results of the intersection delay/blockage analysis on June 17, 2025, to the Vernon City Council and on June 23, 2025, to the Vernon Chamber of Commerce. Multiple property owners and business representatives attended both meetings.<br><br>Based on the video data collected, results were summarized for two conditions (Actual Condition [based on observed train activity] and Worst-Case Condition) to determine how the Malabar Yard railroad improvements would change intersection delay/blockage at eight locations and effects to citywide vehicular circulation. Results are summarized below:<br><br>1. Actual Condition (based on observed train activity)<br><br>a. Length of Observed Trains: 350 feet to 1,500 feet |

b. Daily Intersection Blockage Results: With Malabar Yard railroad improvements, daily intersection delay/blockage would be reduced by 30 minutes.

2. Worst Case Condition (consistent with NEPA/CEQA EIS/SEIR evaluation)

   a. Length of Longest Potential Trains: 3,000 feet

   b. Daily Intersection Blockage Results: If longer trains are needed due to customer demand in the City of Vernon, the corresponding reduction in daily intersection blockage with the Malabar Yard railroad improvements would also increase as compared to the existing condition. Assuming 3,000-foot trains would operate on any given day, daily intersection delay/blockage would be reduced by over 1 hour and 20 minutes. This reduction is based on the assumption that in the existing condition trains would operate with the same length (3,000 feet) without the Malabar Yard railroad improvements.

Based on the train observations conducted in April 2025, the data supports the conclusion that with implementation of the Malabar Yard railroad improvements, a citywide

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| | circulation improvement would occur. This is primarily because:<br><br>1. 3.15 fewer trains would operate in the City of Vernon, and<br><br>2. In the current condition, BNSF's "train building" activities occur on City streets north of Malabar Yard (Pacific Avenue), which triggers a substantial amount of time when railroad gates are down, delaying/blocking vehicular traffic. With the implementation of the Malabar Yard railroad improvements, most train building activities will be relocated to BNSF's Los Angeles Junction (LAJ) rail yard on the east side of the City.<br><br>• Mitigation Measures to Reduce Project-Related Traffic Delays - Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, the Malabar Yard railroad improvements would not exacerbate congestion on streets in Vernon, including Vernon Avenue and Downey Avenue or contribute to delays in product shipments. Malabar Yard Mitigation Measures TR-2 through TR-5 were modeled to verify that the proposed mitigation measures would fully mitigate the adverse effect related to traffic delay. Malabar Yard Mitigation Measure TR-6 could not be included in the traffic model since there is no metric to determine the |

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| | level of effectiveness after coordination with CPUC and the City occurs.<br><br>• Freight Railroad Operations - Key Issue Response #2 includes clarifications to the information presented in the Final EIS Appendix Q Section 2 regarding freight railroad operations. All of the information and analysis of typical freight railroad operational patterns, and the conclusions in the Final EIS are based on a combination of historical data, stakeholder input, and expert analysis. The information collected from BNSF as it relates to the affected train routes, train lengths, consolidated freight operations, and reduced train frequencies is summarized in Key Issue Response #2. As shown in Table 2 of Key Issue Response #2, 8 daily train movements occur on the affected routes considered (Figure 7), and in the future condition, a total of 4.85 daily train movements would occur on these same affected routes (Figure 8). As shown in Table 2, the total daily frequency of train movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night. Figures 7 and 8 depict the existing and future daily train movements on the affected routes.<br><br>• Community Connectivity - The BNSF Harbor Subdivision (parallel to Santa Fe Avenue) has provided service to local customers since it was constructed in the 1880s, even earlier than the incorporation of the City of Vernon. Prior to the opening on the Alameda Corridor |

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| | in 2002 the Subdivision also provided connectivity between the local ports and national railroad networks. See Final EIS Appendix Q Section 1, Figure 1-2 for the location of the Harbor Subdivision. The Harbor Subdivision is also shown in Volume III, Introduction on Figure 7 and 8. In the 1920s the Los Angeles Junction Railway was constructed increasing connectivity and service to local customers. Through the present day numerous local commercial and industrial businesses in the City of Vernon utilize freight rail services to ship goods in and out of their businesses.<br><br>The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from Los Angeles Junction. Daily train movements on the Harbor Subdivision would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Key Issue Response #2, Table 2 and Figures 7 and 8). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent fewer train movements on the Harbor Subdivision. In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day). Fewer train movements on the Harbor Subdivision |

would increase opportunities for enhanced community connectivity.

As discussed above, in response to inquiries related to queuing and traffic congestion at the railroad crossings from Soto Street to Los Angeles Junction, a calculation was performed that demonstrates trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Considering the heavy presence of existing freight trains operating in the City already, reduced train frequencies that would be facilitated by the Malabar Yard railroad improvements, and the duration of the day trains would operate between Malabar Yard and Los Angeles Junction, no adverse effect related to division of communities or reduced community connectivity would occur.

- Life Safety and Emergency Response - Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response

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| | times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers.<br>• Vehicle Idling and Local Air Pollution - Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality |

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| | analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Final EIS Appendix Q Section 3.5, Section 3.5.4.<br><br>Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements and develop solutions that preserve the city's economic vitality and connectivity to the extent feasible.<br><br>**AGE 3-12** Please refer to response to Comment AGE 3-A response for a discussion of the purpose of the Malabar Yard railroad improvements. As discussed in Comment AGE 3-A response, paying BNSF monetary compensation to remove storage tracks at the BNSF West Bank Yard rather than mitigating Project-related effects with physical infrastructure improvements would not preserve current levels of freight rail operations in accordance with the provisions |

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| | of the purpose and need of the Link US Project.<br><br>A summary of building demolition required as part of the Malabar Yard railroad improvements is provided in the project description. Specifically, Final EIS Appendix Q Section 2.5, Table 2-4 provides a summary of the 14 properties that would be directly affected by construction of the Malabar Yard railroad improvements, including those properties that would require building demolition.<br><br>The Malabar Yard railroad improvements are necessary to preserve current level of freight rail operations to address the permanent impact on freight caused by the Link US project. Property acquisitions and any required building demolition (if any) would be managed in accordance with legal requirements, and all affected parties will be compensated fairly.<br><br>Metro understands the concern regarding equitable treatment of businesses affected by the Link US Project. Metro compensates impacted businesses and property owners in accordance with Uniform Relocation Assistance and Real Property Acquisition regulations, ensuring fair treatment. For businesses impacted by the Malabar Yard railroad improvements, Metro is:<br><br>• Offering compensation for property acquisition based on fair market value. |

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| | • Providing relocation assistance where applicable to support business continuity.<br><br>These measures align with Metro's policies and legal obligations, ensuring fairness while addressing the unique requirements of freight rail infrastructure. |
| | **AGE 3-13** Please refer to Comment AGE 3-11 response for a discussion related to mitigation measures to reduce Project-related traffic delays, and reduced freight railroad operations that would occur as a result of the Malabar Yard railroad improvements. As discussed in that response, Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, increased travel times are not expected to occur. In regard to operational and physical impacts to businesses, some job loss resulting from potential building demolition may occur; however, as part of Metro's Relocation Assistance Program and the Uniform Relocation Act benefits processes, any businesses subject to building demolition or displacement would be compensated or referred to potential and/or suitable replacement sites. Parking impacts may occur; however, no adverse effect would occur because the properties would still be usable. Operational and physical impacts to businesses would be minimized by implementing Design Option 2, as the Preferred Alternative, at both locations. |

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| | The comment suggests that the Final EIS did not complete a sufficient analysis because the school is "conveniently just outside the boundary of the Malabar Yard study area." The Final EIS explained its basis for the study area. The Vernon City School was included in environmental evaluation of the Malabar Yard railroad improvements. Please refer to the Comment AGE 3-4 response for a summary of the evaluation pertinent to the Vernon City School as it was considered in the context of the community analysis. As discussed in that response, trains that currently move through the City of Vernon to come into and leave Malabar Yard would be able to move more efficiently, reducing the overall number of train movements on the Harbor Subdivision which is located parallel to Santa Fe Avenue where Vernon City school is located.<br><br>As noted on Final EIS Appendix Q Section 3.10, Page 3.10-16 and shown in Figure 3.10-1, Vernon City School at 2360 East Vernon Avenue, is located outside of the 0.25-mile buffer from the project footprint for the Malabar Yard railroad improvements. The 0.25-mile buffer is the boundary used to determine potential impacts related to the release of hazardous emissions or handling of hazardous waste and materials. This is an industry-standard buffer appropriately utilized in CEQA/NEPA documentation to identify current or historical conditions that could cause soil, groundwater, or other contamination on or adjacent to a property per the American Society of Testing and Materials (ASTM) standard practice ASTM E |

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| | 1527-13 (ASTM 2013). The 0.25-mile search radius also relates to the maximum distance that groundwater contamination is likely to travel for the majority of sites with groundwater contamination.<br><br>The Final EIS Section 3.5 and Final EIS Appendix G both discuss the potential impacts related to pollution (air quality, climate change, and health risk) associated with the Project (Build Alternative and Malabar Yard railroad improvements combined). Final EIS also discusses the potential impacts related to pollution (air quality, climate change, and health risk) associated with the Build Alternative Design Option and Malabar Yard railroad improvements combined. As discussed in Key Issue Response #3, based on South Coast Air Quality Management's (SCAQMD) definition, sensitive receptors are identified as locations where an individual could remain for 24 hours and includes land uses such as residences, schools, playgrounds and athletic facilities on school property, childcare centers, long term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes.<br><br>Based on the type of infrastructure improvements proposed, a buffer of one-quarter mile is used to identify sensitive receptors for further consideration of potential impacts. The nearest sensitive receptors identified and considered in the air quality analysis for the Malabar Yard railroad improvements were:<br><br>• Residences at 2415 2427 E 53rd St. (located approximately 1,325 feet [0.25 |

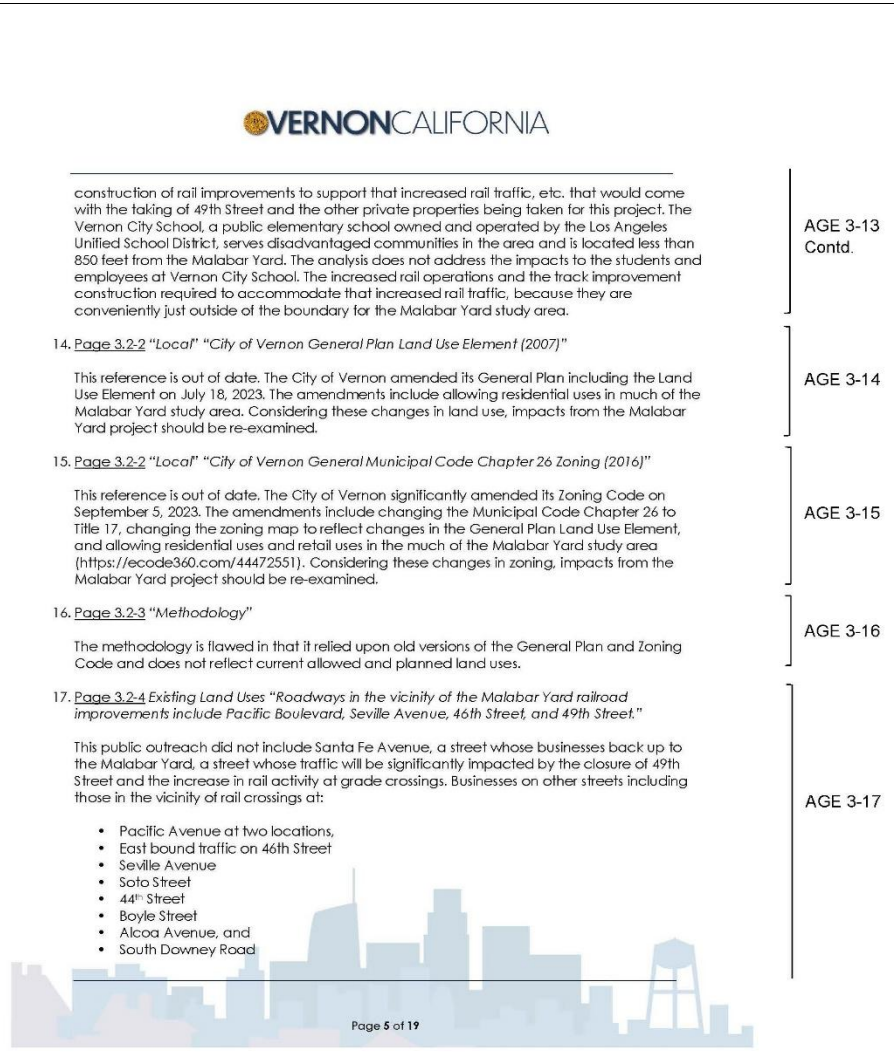
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| | mile] south of the Malabar Yard railroad improvements),<br>• Vernon City School at 2360 East Vernon Avenue (located approximately 1,350 feet [0.25 mile] northwest of the Malabar Yard railroad improvements), and<br>• Residences on Furlong Place (located approximately 1,650 feet [0.31 mile] northwest of the Malabar Yard railroad improvements).<br><br>Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling (which includes truck idling) associated with the Malabar Yard railroad improvements. The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from the Los Angeles Junction. The consolidated train movements would result in 78 percent less train movements on the Harbor Subdivision coming from/to the San Bernardino Subdivision. Thus, fewer train movements on the Harbor Subdivision equates to less vehicle idling (including truck idling) at each of the at-grade crossings where sensitive receptors are located, such as the Vernon City School. Because the implementation of the 46th Street Connector would shift freight rail activity away from sensitive receptors, vehicle idling (including truck idling) at Malabar Yard would be so minimal it would not cause a violation of any air quality standard. |

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| | General Conformity is the pollution prevention and control program that requires a federal agency to assure any proposed activity the agency proposes will conform to the purpose of applicable implementation plans and will not interfere with a State or Tribe's ability to attain and maintain the National Ambient Air Quality Standards (NAAQS) for air quality, as required under Clean Air Act (CAA) section 176(c).<br><br>The purpose of the General Conformity rule is to ensure that:<br><br>• federal activities do not cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS);<br><br>• actions do not worsen existing violations of the NAAQS; and<br><br>• attainment of the NAAQS is not delayed.<br><br>As demonstrated in the Final EIS pages 3.5-26 to 3.5-34, RONA, and Appendix G of the Final EIS, the annual construction emissions and annual net change in operational emissions for all analysis years generated by the Build Alternative and Malabar Yard railroad improvements, as compared to the No Action Alternative, are below the general conformity *de minimis* levels for all years of analysis with implementation of mitigation. As such a formal general conformity determination with additional localized analyses are not required. The Build Alternative and Malabar Yard railroad improvements would not interfere with the state's plans to attain and maintain the |

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| | NAAQS. A detailed $PM_{10}$ and $PM_{2.5}$ hot-spot analysis was not completed because FCAA and 40 CFR 93.116 requirements would be met without an explicit hot-spot analysis.<br><br>Key Issue Response #3 acknowledges that fewer train movements on the Harbor Subdivision equates to less vehicle idling at each of the at-grade crossings where sensitive receptors, such as the Vernon City School and the residences on Furlong Place are currently located and where additional sensitive receptors are planned in the future.<br><br>As indicated in Final SEIR, Table 7-31 criteria pollutants would not exceed SCAQMD thresholds during construction or operations and air quality impacts associated with the Malabar Yard railroad improvements would be less than significant. Regarding localized emissions, the Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. On-site construction emissions at Malabar Yard were compared to local screening thresholds from SCAQMD and were found to be below the thresholds for all criteria air pollutants (NOx, CO, $PM_{10}$, $PM_{2.5}$) (see Appendix F of Final EIS Appendix Q). Air quality impacts to sensitive receptors further away from the emission source, such as the Vernon City School located 0.25-mile northwest of the Malabar Yard railroad improvements) would be less likely to be impacted than those identified through the localized analysis. Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would |

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| | not cause or contribute to an exceedance of an ambient air standard.<br><br>Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Final EIS Appendix Q Section 3.5, Section 3.5.4. In addition to the regional air quality benefits, from a localized perspective, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard.<br><br>The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present |

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| | upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*. |



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construction of rail improvements to support that increased rail traffic, etc. that would come with the taking of 49th Street and the other private properties being taken for this project. The Vernon City School, a public elementary school owned and operated by the Los Angeles Unified School District, serves disadvantaged communities in the area and is located less than 850 feet from the Malabar Yard. The analysis does not address the impacts to the students and employees at Vernon City School. The increased rail operations and the track improvement construction required to accommodate that increased rail traffic, because they are conveniently just outside of the boundary for the Malabar Yard study area.

AGE 3-13 Contd.

14. Page 3.2-2 *"Local" "City of Vernon General Plan Land Use Element (2007)"*

This reference is out of date. The City of Vernon amended its General Plan including the Land Use Element on July 18, 2023. The amendments include allowing residential uses in much of the Malabar Yard study area. Considering these changes in land use, impacts from the Malabar Yard project should be re-examined.

AGE 3-14

15. Page 3.2-2 *"Local" "City of Vernon General Municipal Code Chapter 26 Zoning (2016)"*

This reference is out of date. The City of Vernon significantly amended its Zoning Code on September 5, 2023. The amendments include changing the Municipal Code Chapter 26 to Title 17, changing the zoning map to reflect changes in the General Plan Land Use Element, and allowing residential uses and retail uses in the much of the Malabar Yard study area (https://ecode360.com/44472551). Considering these changes in zoning, impacts from the Malabar Yard project should be re-examined.

AGE 3-15

16. Page 3.2-3 *"Methodology"*

The methodology is flawed in that it relied upon old versions of the General Plan and Zoning Code and does not reflect current allowed and planned land uses.

AGE 3-16

17. Page 3.2-4 *Existing Land Uses "Roadways in the vicinity of the Malabar Yard railroad improvements include Pacific Boulevard, Seville Avenue, 46th Street, and 49th Street."*

This public outreach did not include Santa Fe Avenue, a street whose businesses back up to the Malabar Yard, a street whose traffic will be significantly impacted by the closure of 49th Street and the increase in rail activity at grade crossings. Businesses on other streets including those in the vicinity of rail crossings at:

- Pacific Avenue at two locations,
- East bound traffic on 46th Street
- Seville Avenue
- Soto Street
- 44th Street
- Boyle Street
- Alcoa Avenue, and
- South Downey Road

AGE 3-17

Page 5 of 19

**AGE 3-14** As discussed in Comment AGE 3-8 response, the Malabar Yard railroad improvements were determined to be consistent with the goals and policies within the *2023 Vernon Westside Zone Change and General Plan Amendment*. Therefore, no conflict would occur with implementation of the Malabar Yard railroad improvements.

The Malabar Yard railroad improvements would facilitate consolidation of freight service in the city from Los Angeles Junction; thereby reducing the total daily train movements on the Harbor Subdivision parallel to Santa Fe Avenue where future mixed-use development is planned. This reduction of train movements would result in a benefit of localized air emissions and noise and vibration reductions to nearby sensitive receptors that are currently present, in addition to future sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.

In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Final EIS. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning

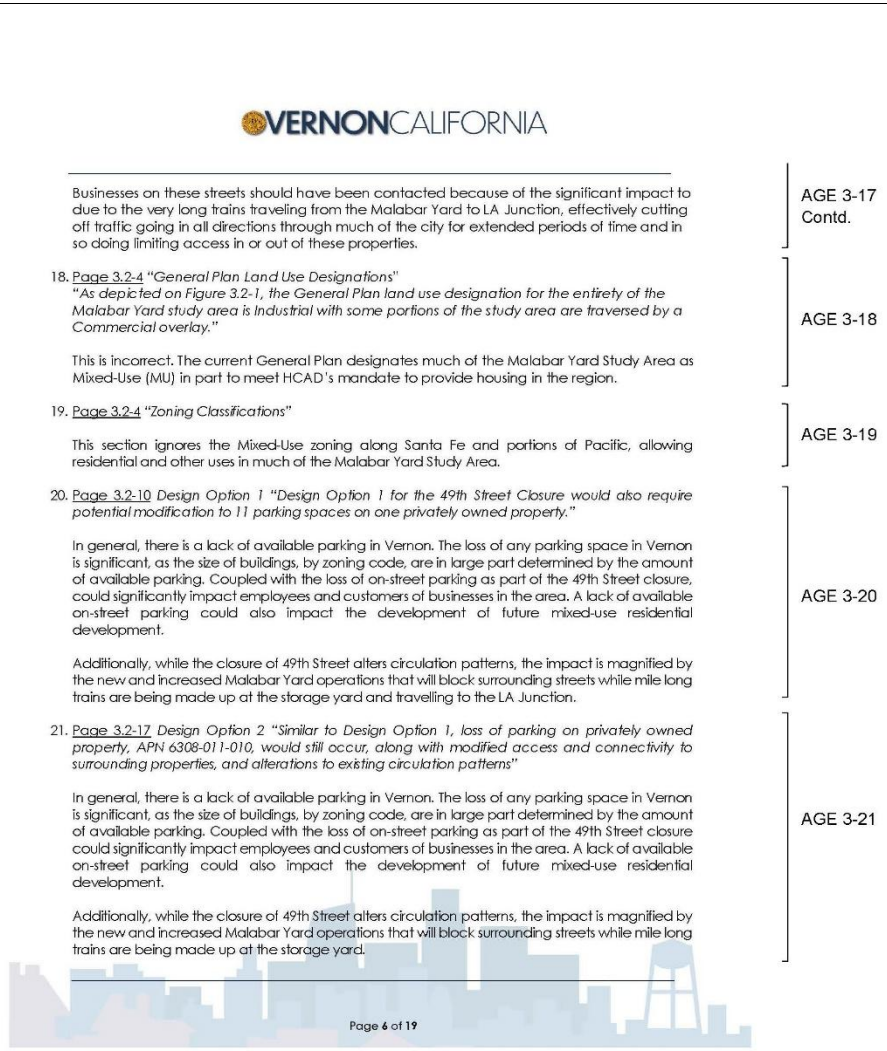
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| | | initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis and in Final EIS Appendix Q, Appendix G, Offsetting Mitigation Measures.<br><br>Please refer to Key Issue Response #6 for a discussion of the land use and planning analysis related to existing and future land uses related to the *2023 Vernon Westside Zone Change and General Plan Amendment*. |
| | **AGE 3-15** | Please refer to Comment AGE 8 response and AGE 3-14 response directly above. |
| | **AGE 3-16** | Please refer to Comment AGE 3-8 response (and Key Issue Response #6) for the reasons for why the previous version of the Zoning Code and General Plan were considered. A consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment* was conducted, and no conflicts would occur with implementation of the Malabar Yard railroad improvements. |
| | **AGE 3-17** | Please refer to Key Issue Response #1 for a discussion of stakeholder engagement activities conducted in the City of Vernon to support the environmental review process for the Malabar Yard railroad improvements. As discussed in that response, Metro implemented a wide range of formal and informal outreach methods such as in-person and virtual public meetings, business and |

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| | property owner briefings, coordination meetings with City of Vernon staff, public presentations to the Vernon Business and Industry Commission, Vernon City Council, Vernon Chamber of Commerce, distribution of legal advertisements, email blasts, door to door visits to potentially affected properties, phone calls to the businesses using publicly available information, Link US Project pamphlet distribution, and social media engagement. These outreach activities demonstrate that Metro and CHSRA met and exceeded legal requirements regarding responsibilities to engage and meaningfully involve all affected communities in the public decision-making process.<br><br>In 2020 and again in 2024, Metro made physical visits to all potentially affected parcels and properties adjacent to the proposed Malabar Yard railroad improvements to engage with property owners and tenants and obtain contact information to share project details.<br><br>A summary of the notices, announcements, and mailings that were distributed to properties in Vernon is below:<br><br>• On September 22, 2020, Metro hand-delivered to owners of potentially affected properties notifications of the October 8, 2020 Virtual Public Scoping Meeting.<br><br>• On September 22, October 6, and October 8, 2020, Metro distributed flyers and e-blasts to notify individuals, organizations, and agencies on the stakeholder distribution list including |

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| | property owners and tenants of potentially affected parcels, the Vernon Chamber of Commerce, the Vernon Business and Industry Commission, and City representatives of the Revised NOI and October 8, 2020 Virtual Public Scoping Meeting.<br>• On September 29, 2020, Metro used the County of Los Angeles assessor parcel information to notify all owners of properties traversed by the Project footprint that Metro had released a Revised NOI and that Metro was holding a Virtual Public Scoping Meeting on October 8, 2020.<br>• Legal advertisements for the Revised NOI and Virtual Public Scoping Meeting were issued in five newspapers in 2020<br>• On October 25, 2020, Metro distributed a tri-fold pamphlet to all property owners in the jurisdictional limits of Vernon and in the far northern portion of Huntington Park<br>• On June 26, 2024, hand-delivered notifications were distributed to owners of all potentially affected properties to notify them of the Draft EIS/SEIR public comment period and Open House/Public Hearing.<br>• Link US Project tri-fold mailers (approximately 5,000) were distributed to owners of properties within 1-mile radius of the Malabar Yard railroad improvements prior to the Draft EIS/SEIR public review period and Open House/Public Hearing |

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| | • Legal advertisements for the release of the Draft EIS/SEIR and Open House/Public Hearing were issued in four newspapers in 2024<br><br>As discussed in Key Issue Response #1, between December 2024 and February 2025, Metro also met with 10 of 11 property owners/tenants that would be directly impacted by the Malabar Yard railroad improvements and 3 additional property owners/tenants and/or representatives that are not directly impacted, but that provided comments on the Draft EIS/SEIR during the Draft EIS/SEIR public comment period. The commentor was present during one of these meetings to gather feedback on the draft responses to comments that would be presented in the Final EIS, updates on the progress of ongoing meetings being held with all affected property owners and the City, alternatives considered based on direction from Los Angeles County Board of Supervisor Hahn's office, benefits of reduced railroad operations throughout the City, and the methods to minimize property impacts resulting from the 49th Street Closure.<br><br>These outreach activities demonstrate that Metro and CHSRA met and exceeded legal requirements regarding responsibilities to engage and meaningfully involve all affected communities in the public decision-making process.<br><br>Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential |

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| | queuing associated with implementation of Malabar Yard railroad improvements. As discussed in that response, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue - construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue - operations, and Fruitland Avenue - operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. |



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Businesses on these streets should have been contacted because of the significant impact to due to the very long trains traveling from the Malabar Yard to LA Junction, effectively cutting off traffic going in all directions through much of the city for extended periods of time and in so doing limiting access in or out of these properties.

AGE 3-17 Contd.

18. Page 3.2-4 *"General Plan Land Use Designations"*
*"As depicted on Figure 3.2-1, the General Plan land use designation for the entirety of the Malabar Yard study area is Industrial with some portions of the study area are traversed by a Commercial overlay."*

This is incorrect. The current General Plan designates much of the Malabar Yard Study Area as Mixed-Use (MU) in part to meet HCAD's mandate to provide housing in the region.

AGE 3-18

19. Page 3.2-4 *"Zoning Classifications"*

This section ignores the Mixed-Use zoning along Santa Fe and portions of Pacific, allowing residential and other uses in much of the Malabar Yard Study Area.

AGE 3-19

20. Page 3.2-10 *Design Option 1 "Design Option 1 for the 49th Street Closure would also require potential modification to 11 parking spaces on one privately owned property."*

In general, there is a lack of available parking in Vernon. The loss of any parking space in Vernon is significant, as the size of buildings, by zoning code, are in large part determined by the amount of available parking. Coupled with the loss of on-street parking as part of the 49th Street closure, could significantly impact employees and customers of businesses in the area. A lack of available on-street parking could also impact the development of future mixed-use residential development.

Additionally, while the closure of 49th Street alters circulation patterns, the impact is magnified by the new and increased Malabar Yard operations that will block surrounding streets while mile long trains are being made up at the storage yard and travelling to the LA Junction.

AGE 3-20

21. Page 3.2-17 *Design Option 2 "Similar to Design Option 1, loss of parking on privately owned property, APN 6308-011-010, would still occur, along with modified access and connectivity to surrounding properties, and alterations to existing circulation patterns"*

In general, there is a lack of available parking in Vernon. The loss of any parking space in Vernon is significant, as the size of buildings, by zoning code, are in large part determined by the amount of available parking. Coupled with the loss of on-street parking as part of the 49th Street closure could significantly impact employees and customers of businesses in the area. A lack of available on-street parking could also impact the development of future mixed-use residential development.

Additionally, while the closure of 49th Street alters circulation patterns, the impact is magnified by the new and increased Malabar Yard operations that will block surrounding streets while mile long trains are being made up at the storage yard.

AGE 3-21

Page 6 of 19

**AGE 3-18** Please refer to Key Issue Response #6 for a discussion of the land use and planning analysis related to existing and future land uses related to the *2023 Vernon Westside Zone Change and General Plan Amendment*. As discussed in Comment AGE 3-8 response, the *2023 Vernon Westside Zone Change and General Plan Amendment* (adopted July 2023) was not considered in the Draft EIS/SEIR environmental evaluation because the zone change and amendment was not formally adopted at the time the Revised NOI was issued in September 2020. No conflicts would occur with implementation of the Malabar Yard railroad improvements.

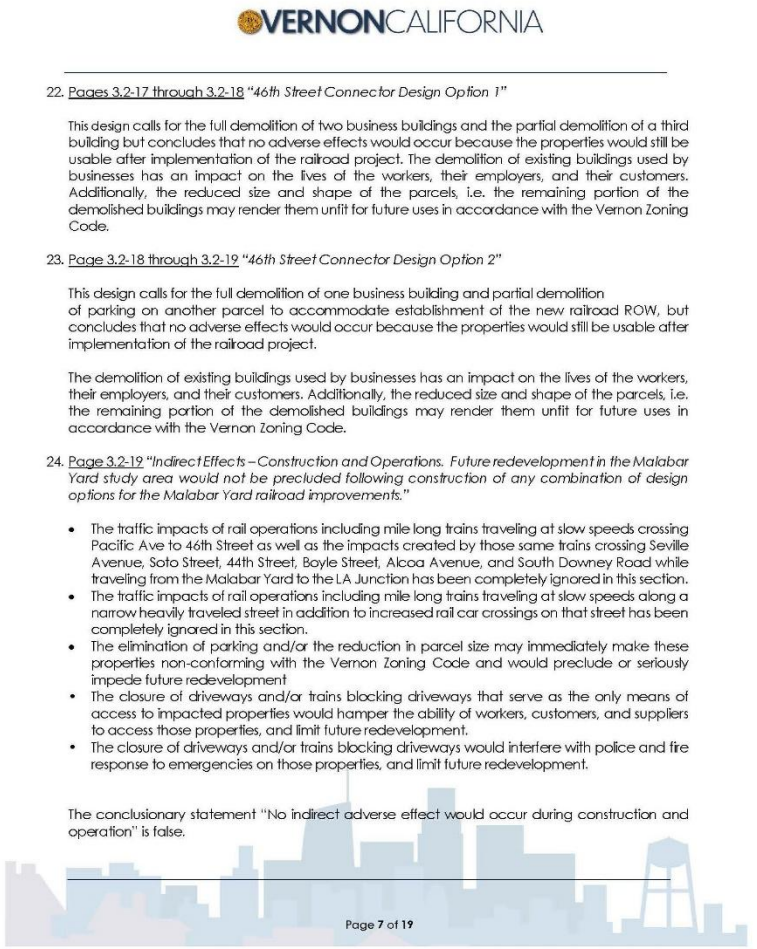
**AGE 3-19** As discussed in Comment AGE 3-8 response, the Malabar Yard railroad improvements would facilitate consolidation of freight service in the city from Los Angeles Junction; thereby reducing the total daily train movements on the Harbor Subdivision parallel to Santa Fe Avenue where future mixed-use development is planned. This reduction of train movements would result in a benefit of localized air emissions and noise and vibration reductions to nearby sensitive receptors that are currently present, in addition to future sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.

In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects

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| | | disclosed in the Draft EIS/SEIR. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis. Key Issue Response #6 includes a consistency analysis with the *2023 Vernon Westside Zone Change and General Plan Amendment*. As discussed in the conclusion to Key Issue Response #6, no conflicts would occur with implementation of the Malabar Yard railroad improvements.<br><br>**AGE 3-20** Please refer to Key Issue Response #5 for a detailed discussion of operational and physical impacts to businesses. As outlined in that response, such impacts will be minimized through measures including compensation or relocation of affected businesses and identifying opportunities for long-term parking solutions.<br><br>The Malabar Yard is an existing freight yard utilized by BNSF to serve local customers. Please refer to the Comment AGE 3-A response for a discussion related to the reduced train movements on the Harbor Subdivision and the net reduction of 3.15 trains per day. |

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| | Trains operating on the 46th Street Connector or any other considered routes (Final EIS Volume III, Introduction) are not anticipated to reach lengths of 5,280 feet (1 mile). Instead, these trains would measure up to 3,000 feet in length, consistent with the current length of trains operating on these routes. Clarifications to the information presented in the Draft EIS/SEIR regarding train movements and lengths in existing and future conditions have been made in Key Issue Response #2.<br><br>Metro and BNSF are committed to collaborating with the City of Vernon to explore long-term parking solutions for any private or on-street parking potentially affected by the implementation of Malabar Yard railroad improvements. For example, in 2020 and 2021, two parking configurations were presented to City of Vernon staff and local property owners for the area east of the 49th Street closure where permanent bollards are proposed. No objections were received, and preferences were expressed for bollards to be located at the railroad right-of-way to allow for parking along 49th Street.<br><br>As disclosed in Final EIS Appendix Q Section 3.2, the 49th Street Closure Design Options 1 and 2 would result in the potential modification of 11 and 5 parking spaces at 4900 Santa Fe Avenue, respectively. However, the existing parking lot, which accommodates approximately 82 marked spaces, would retain either 71 or 77 spaces, depending on the chosen option. This roadway modification is a critical design |

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| | element to provide safe and legal maneuverability as well as appropriate ingress and egress for adjacent properties. As disclosed in the Final EIS, while parking modifications would occur, no direct adverse effects are anticipated because the property would remain functional after implementing the proposed railroad improvements.<br><br>**AGE 3-21** Please refer to the Comment AGE 3-20 response. |



VERNONCALIFORNIA

22. Pages 3.2-17 through 3.2-18 *"46th Street Connector Design Option 1"*

This design calls for the full demolition of two business buildings and the partial demolition of a third building but concludes that no adverse effects would occur because the properties would still be usable after implementation of the railroad project. The demolition of existing buildings used by businesses has an impact on the lives of the workers, their employers, and their customers. Additionally, the reduced size and shape of the parcels, i.e. the remaining portion of the demolished buildings may render them unfit for future uses in accordance with the Vernon Zoning Code.

AGE 3-22

23. Page 3.2-18 through 3.2-19 *"46th Street Connector Design Option 2"*

This design calls for the full demolition of one business building and partial demolition of parking on another parcel to accommodate establishment of the new railroad ROW, but concludes that no adverse effects would occur because the properties would still be usable after implementation of the railroad project.

The demolition of existing buildings used by businesses has an impact on the lives of the workers, their employers, and their customers. Additionally, the reduced size and shape of the parcels, i.e. the remaining portion of the demolished buildings may render them unfit for future uses in accordance with the Vernon Zoning Code.

AGE 3-23

24. Page 3.2-19 *"Indirect Effects – Construction and Operations. Future redevelopment in the Malabar Yard study area would not be precluded following construction of any combination of design options for the Malabar Yard railroad improvements."*

- The traffic impacts of rail operations including mile long trains traveling at slow speeds crossing Pacific Ave to 46th Street as well as the impacts created by those same trains crossing Seville Avenue, Soto Street, 44th Street, Boyle Street, Alcoa Avenue, and South Downey Road while traveling from the Malabar Yard to the LA Junction has been completely ignored in this section.
- The traffic impacts of rail operations including mile long trains traveling at slow speeds along a narrow heavily traveled street in addition to increased rail car crossings on that street has been completely ignored in this section.
- The elimination of parking and/or the reduction in parcel size may immediately make these properties non-conforming with the Vernon Zoning Code and would preclude or seriously impede future redevelopment
- The closure of driveways and/or trains blocking driveways that serve as the only means of access to impacted properties would hamper the ability of workers, customers, and suppliers to access those properties, and limit future redevelopment.
- The closure of driveways and/or trains blocking driveways would interfere with police and fire response to emergencies on those properties, and limit future redevelopment.

The conclusionary statement "No indirect adverse effect would occur during construction and operation" is false.

AGE 3-24

Page 7 of 19

**AGE 3-22** Final EIS Appendix Q Section 3.13 discloses that Design Option 1 could result in the displacement of existing businesses on three parcels from the full demolition of two buildings and partial a demolition of one building, totaling approximately 48,872 square feet of industrial/manufacturing building space. This may also result in up to 46 jobs displaced. As stated in Final EIS Appendix Q Section 3.15, given that there is available land within and surrounding the Malabar Yard study area and that industrial businesses may not be dependent on local patronage, some relocation of businesses could be assumed (67 percent of the industrial businesses could be assumed to relocate in Los Angeles County). Upon implementation of Metro's Relocation Assistance Program and the Uniform Relocation Act, no adverse effect on local businesses would occur.

The size and shape of the remaining portion of affected parcels would be determined during final design. Metro is coordinating with the City to identify developable areas where opportunities for land use or parking initiatives could be explored upon Project implementation.

As discussed in Key Issue Response #5, Design Option 2 at both locations reduces overall property impacts because it requires less building acquisition and fewer driveways and parking spaces to be affected. Based on the comments received during public review, the Final EIS identifies Design Option 2 at

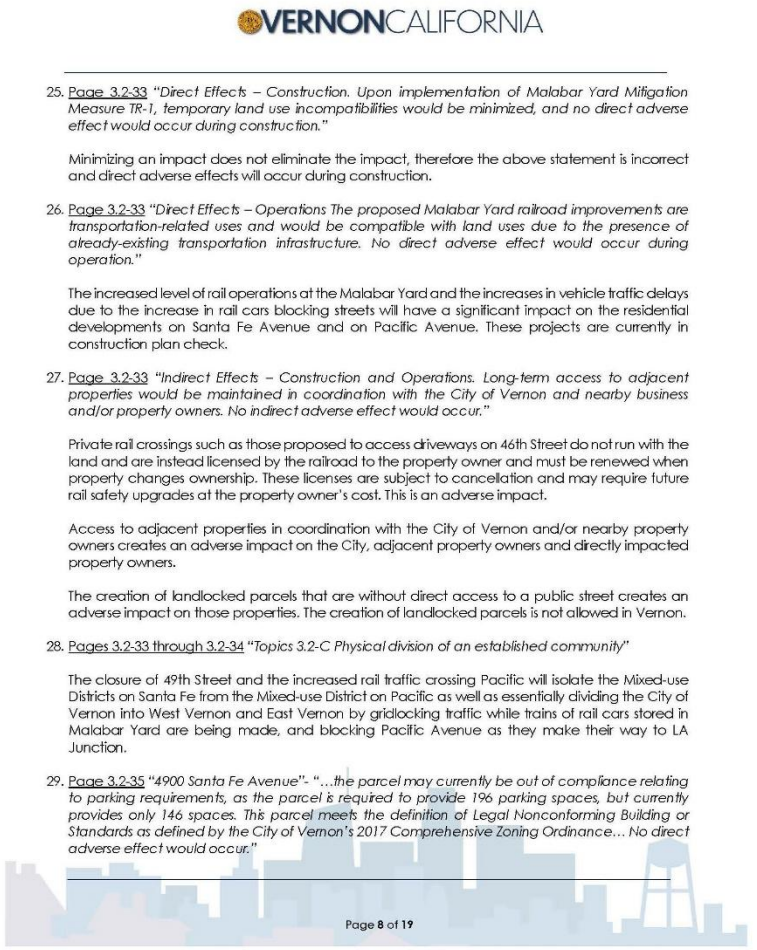
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| | both locations (49th Street and 46th Street) as the preferred design option.<br><br>**AGE 3-23** As disclosed in Final EIS Appendix Q Section 3.13 and Section 3.2, Design Option 2 could result in the full acquisition of one parcel and demolition of one building totaling approximately 9,711 square feet of industrial/manufacturing building space, which may also result in up to nine jobs displaced. Some parking spaces on three additional parcels on the south side of 46th Street may be removed to implement the 46th Street Connector.<br><br>Please refer to the Comment AGE 3-22 response for a description of why Design Option 2 at both locations is the preferred design option.<br><br>Final EIS Appendix Q documents the effects of the building demolition required for each design option. The commenter does not provide a specific parcel where the remaining portion of a parcel could be reviewed to provide an additional response.<br><br>**AGE 3-24** The responses below address the comments related to indirect traffic impacts, parking, access, and emergency response times.<br><br>• Traffic Impacts of Rail Operations - Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. The evaluation on Page 3.2-19 is |

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| | intended to be focused on land use and planning.<br><br>Existing and proposed rail operations as outlined in the Project Description (Final EIS/EIS Appendix Q Section 2.0) are fully accounted for and included in the environmental evaluation. It is important to clarify that trains currently operate to the east of Seville Avenue and already cross Soto Street, 44th Street, Boyle Street, Alcoa Avenue, and South Downey Road (East Seville route shown on Volume III Introduction, Figure 7 and 8). No physical improvements or operational modifications on the East Seville Connection are proposed.<br><br>Trains operating on the 46th Street Connector would be 3,000 feet and not expected to be 5,280 feet (1 mile) in length.<br><br>• Parking - While a reduction in parcel size is noted in the comment, no specific parcel or address is noted to review to provide a response to the assertions over whether they would continue to comply with the Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023).<br><br>• Access - For parcels that would not be subject to full acquisition, ingress/egress is maintained.<br><br>• Emergency Response Times - Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As |

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| | discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above |

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| | demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers.<br><br>• Operational and Physical Impacts to Businesses - Please refer to Key Issue Response #5 for a discussion of operational and physical impacts to businesses. As stated in that response, Design Option 2 at both locations reduces overall property impacts because it requires less building demolition and fewer driveways and parking spaces to be affected. Based on the comments received during public review, the Final EIS identifies Design Option 2 at both locations (49th Street and 46th Street) as the preferred design option.<br><br>• Please refer to Key Issue Response #6 for a discussion of the land use and planning analysis related to existing and future land uses related to the *2023 Vernon Westside Zone Change and General Plan Amendment*. The information provided in that response demonstrates that the Malabar Yard railroad improvements would be consistent with applicable policies of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>The conclusion that no indirect adverse effect would occur during construction and operation is supported by the comprehensive |

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| | analysis in the Final EIS, which considers traffic, zoning, and access impacts. |



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25. Page 3.2-33 *"Direct Effects – Construction. Upon implementation of Malabar Yard Mitigation Measure TR-1, temporary land use incompatibilities would be minimized, and no direct adverse effect would occur during construction."*

    Minimizing an impact does not eliminate the impact, therefore the above statement is incorrect and direct adverse effects will occur during construction.

    AGE 3-25

26. Page 3.2-33 *"Direct Effects – Operations The proposed Malabar Yard railroad improvements are transportation-related uses and would be compatible with land uses due to the presence of already-existing transportation infrastructure. No direct adverse effect would occur during operation."*

    The increased level of rail operations at the Malabar Yard and the increases in vehicle traffic delays due to the increase in rail cars blocking streets will have a significant impact on the residential developments on Santa Fe Avenue and on Pacific Avenue. These projects are currently in construction plan check.

    AGE 3-26

27. Page 3.2-33 *"Indirect Effects – Construction and Operations. Long-term access to adjacent properties would be maintained in coordination with the City of Vernon and nearby business and/or property owners. No indirect adverse effect would occur."*

    Private rail crossings such as those proposed to access driveways on 46th Street do not run with the land and are instead licensed by the railroad to the property owner and must be renewed when property changes ownership. These licenses are subject to cancellation and may require future rail safety upgrades at the property owner's cost. This is an adverse impact.

    Access to adjacent properties in coordination with the City of Vernon and/or nearby property owners creates an adverse impact on the City, adjacent property owners and directly impacted property owners.

    The creation of landlocked parcels that are without direct access to a public street creates an adverse impact on those properties. The creation of landlocked parcels is not allowed in Vernon.

    AGE 3-27

28. Pages 3.2-33 through 3.2-34 *"Topics 3.2-C Physical division of an established community"*

    The closure of 49th Street and the increased rail traffic crossing Pacific will isolate the Mixed-use Districts on Santa Fe from the Mixed-use District on Pacific as well as essentially dividing the City of Vernon into West Vernon and East Vernon by gridlocking traffic while trains of rail cars stored in Malabar Yard are being made, and blocking Pacific Avenue as they make their way to LA Junction.

    AGE 3-28

29. Page 3.2-35 *"4900 Santa Fe Avenue"- "…the parcel may currently be out of compliance relating to parking requirements, as the parcel is required to provide 196 parking spaces, but currently provides only 146 spaces. This parcel meets the definition of Legal Nonconforming Building or Standards as defined by the City of Vernon's 2017 Comprehensive Zoning Ordinance… No direct adverse effect would occur."*

    AGE 3-29

Page 8 of 19

**AGE 3-25** As disclosed in Final EIS Appendix Q Section 3.2, temporary disruption in existing traffic circulation could result in land use incompatibilities from access restrictions to nearby businesses when road closures are required and, therefore, would be considered a temporary adverse effect.

Pursuant to the NEPA regulations, mitigation includes:

a) avoiding the adverse effect;

b) minimizing the adverse effect;

c) rectifying the adverse effect;

d) reducing or eliminating the adverse effect over time; or

e) compensating for the adverse effect.

See 40 C.F.R. 1508.20.

Similarly, CEQA Guidelines §15370 defined "mitigation" as:

- Avoiding the impact altogether:
- Minimizing the impact by limiting its degree or magnitude;
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environmental resource;
- Reducing or eliminating the impact over time, through actions that preserve or maintain the resource; and

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| | | • Compensating for the impact by replacing or providing substitute resources or environmental conditions, including through permanent protection of such resources in the form of conservation easements.<br><br>The Final EIS describes feasible mitigation measures which would avoid or minimize significant adverse effects, including implementation of Malabar Yard Mitigation Measure TR-1. Malabar Yard Mitigation Measure TR-1 requires implementation of a TMP with appropriate traffic mitigation strategies to minimize access restrictions to nearby businesses when road closures are required during construction.<br><br>Because the TMP will reduce avoid, minimize, or reduce the access impacts, those impacts would not qualify as adverse. |
| | **AGE 3-26** | Malabar Yard is an existing freight yard that BNSF currently uses to serve local customers. Please refer to Comment AGE 3-B response for a discussion related to the reduced train movements on the Harbor Subdivision and the net reduction of 3.15 trains per day throughout the City. Reduced train movements on the Harbor Subdivision has a direct correlation to beneficial effects on future mixed-use residential development along Santa Fe Avenue.<br><br>Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of |

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| | | Malabar Yard railroad improvements and how impacts related to traffic delays would be mitigated via implementation of Malabar Yard Mitigation Measures TR-1 through TR-5. Based on the analysis in Key Issue Response #2, no adverse effects on residential developments on Santa Fe Avenue and Pacific Boulevard are anticipated. |
| | **AGE 3-27** | Metro expects that, to the extent necessary, any future property owners would be able to negotiate successfully for access across the tracks to prevent landlocked parcels.<br><br>The commenter does not identify any particular parcel that would have only one access point that it could lose in the future. The Malabar Yard railroad improvements include design features to maximize access and connectivity for affected parcels. For these reasons, adverse effects on the City of Vernon and/or adjacent property owners and business owners are not anticipated.<br><br>As disclosed in the Final EIS, the design options considered include driveway modifications as needed to facilitate safe and legal ingress/egress to affected properties. |
| | **AGE 3-28** | Please refer to the Comment AGE 3-B response for a discussion of the net reduction of train movements. As discussed in that response, daily train movements on the Harbor Subdivision adjacent to areas where mixed-use residential land uses are planned, would be reduced from 4 existing daily train movements to 0.85 daily train movements. The total daily frequency of |

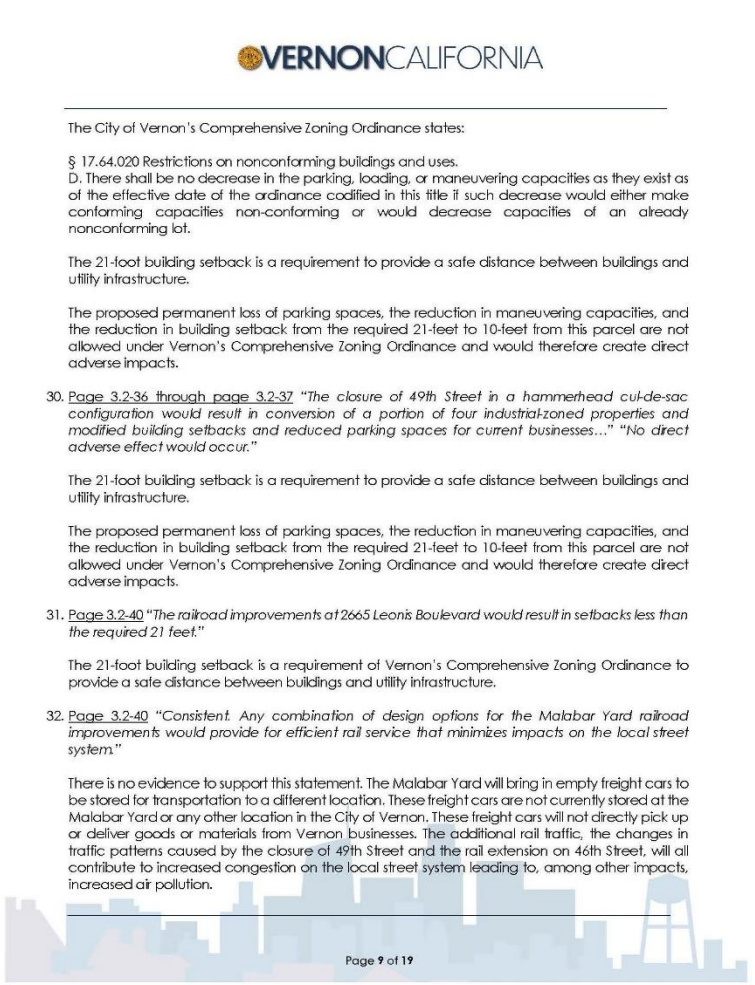
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| | | trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day). Fewer train movements and relocated "train building" improves citywide circulation. Please refer to Comment AGE 3-11 response for a discussion of city connectivity. As discussed in that response, considering the heavy presence of existing freight trains operating in the City already, reduced train frequencies that would be facilitated by the Malabar Yard railroad improvements, and the duration of the day trains would operate between Malabar Yard and Los Angeles Junction (2 percent of the day, half of which would operate during the night [7:30pm to 2:00am]), no adverse effect related to division of communities or reduced community connectivity would occur. Fewer train movements on the Harbor Subdivision would increase opportunities for enhanced community connectivity. Please also refer to Key Issue Response #2 for a discussion of traffic impacts and mitigation measures to reduce traffic congestion. As discussed in that response, drivers could reroute around the 49th Street closure easily, and the traffic conditions on the routes where traffic redistribution would occur could accommodate those additional vehicles without significant additional delays. |
| | **AGE 3-29** | The parcel at 4900 Santa Fe Avenue (subject property) would not be rendered unusable after implementation of the Malabar Yard railroad improvements. Pursuant to City of Vernon's 2023 Comprehensive Zoning Ordinance Section 17.12.030, the City's Public Works Director has the authority to make minor exceptions to zoning standards |

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| | to ensure an equitable and reasonable application of standards, provided that the exception does not result in a reduction of a standard that is greater than 10 percent. A variance may be requested for a reduction of a standard that is greater than 10 percent.<br><br>The subject property may meet the definition of Legal nonconforming uses and legal nonconforming buildings or standards as defined by the Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023) Chapter 17.64, Nonconforming Uses. § 17.64.020, Restrictions on nonconforming buildings and uses, states that there shall be no decrease in the parking, loading, or maneuvering capacities as they exist as of the effective date of the ordinance codified in this title if such decrease would either make conforming capacities non-conforming or would decrease capacities of an already nonconforming lot, unless a parking reduction is approved pursuant to Section 17.56.060(Q). Section 17.56.50, No loss of minimum required space or maneuvering capacity of the Comprehensive Zoning Ordinance provides that existing parking may not be reduced below the existing number of spaces if the existing number is below the required minimum unless substitute spaces are provided. Metro and BNSF will coordinate with the City of Vernon to identify opportunities for long-term parking solutions to offset loss of parking that may occur upon implementation of the Malabar Yard railroad improvements. Given the discretionary authority of the Public Works Director and allowance to provide substitute parking spaces under Section 17.56.50 of the |

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| | Comprehensive Zoning Ordinance, Metro expects that it can identify parking solutions that would not conflict with the ordinance, and therefore, the loss of parking will not cause an adverse effect.<br><br>As concluded in Key Issue Response #6, the Final EIS was updated to include a consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment*. While future residential land uses are planned in the vicinity of proposed Malabar Yard railroad improvements, it should be acknowledged that the proposed railroad improvements and future residential land uses can coexist, and the City has the discretion to approve new development in areas that are adjacent to or in close proximity to existing freight rail corridors. The proposed Malabar Yard railroad improvements would not preclude implementation of the City's future development goals. There is no change to the land use and planning impacts or conclusions presented in the Final EIS as no new adverse effects related to land use and planning in the City of Vernon have been identified.<br><br>As discussed in Key Issue Response #5, the 49th Street Closure would result in a loss of a portion of street parking and require potential alteration to parking spots on privately owned property. Metro and BNSF will coordinate with the City of Vernon to identify opportunities for long-term parking solutions to offset loss of parking that may occur upon implementation of the Malabar Yard railroad improvements. Given the |

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| | discretionary authority of the Public Works Director and allowance to provide substitute parking spaces under Section 17.56.50 of the Comprehensive Zoning Ordinance, Metro expects that it can identify parking solutions that would not conflict with the ordinance, and therefore, the loss of parking will not cause an adverse effect.<br><br>The Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023) states that properties defined as legal nonconforming uses and legal nonconforming buildings or standards are required to comply with building setbacks set forth in Section §17.22.080, Site planning standards. Part C, Building Setbacks, states that every building or structure shall be set back not less than 21 feet from the curb face, as shown on the Master Plan of Streets. A reduced setback distance may be approved by the General Manager of Public Utilities, but not less than to the ultimate planned right-of-way of the street as shown on the Master Plan of Streets. The ultimate planned right-of-way width for 49th Street is shown as 60 feet, which is the existing right-of-way.<br><br>Upon implementation of the Malabar Yard railroad improvements, some property lines would be located at a distance less than 21 feet to existing buildings; however, no new buildings are proposed that would introduce a safety issue. The proposed roadway modifications facilitate essential design components while maximizing safe and legal maneuverability and ingress/egress for adjacent properties. Considering the context and intensity of potential effects related to |

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| | parking and setbacks at the subject parcel, potential effects related to land use and planning are not adverse.<br><br>NEPA regulations require disclosure of the conflicts (40 C.F.R. 1502.6(c). As engineering advances, and ministerial permits are processed with the City of Vernon, Metro will coordinate with affected property owners and the City of Vernon to advance engineering design while maintaining or improving the parcel specific requirements of the Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023) related to building setback requirements. |



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The City of Vernon's Comprehensive Zoning Ordinance states:

§ 17.64.020 Restrictions on nonconforming buildings and uses.
D. There shall be no decrease in the parking, loading, or maneuvering capacities as they exist as of the effective date of the ordinance codified in this title if such decrease would either make conforming capacities non-conforming or would decrease capacities of an already nonconforming lot.

The 21-foot building setback is a requirement to provide a safe distance between buildings and utility infrastructure.

The proposed permanent loss of parking spaces, the reduction in maneuvering capacities, and the reduction in building setback from the required 21-feet to 10-feet from this parcel are not allowed under Vernon's Comprehensive Zoning Ordinance and would therefore create direct adverse impacts.

AGE 3-29 Contd.

30. Page 3.2-36 through page 3.2-37 *"The closure of 49th Street in a hammerhead cul-de-sac configuration would result in conversion of a portion of four industrial-zoned properties and modified building setbacks and reduced parking spaces for current businesses…" "No direct adverse effect would occur."*

The 21-foot building setback is a requirement to provide a safe distance between buildings and utility infrastructure.

The proposed permanent loss of parking spaces, the reduction in maneuvering capacities, and the reduction in building setback from the required 21-feet to 10-feet from this parcel are not allowed under Vernon's Comprehensive Zoning Ordinance and would therefore create direct adverse impacts.

AGE 3-30

31. Page 3.2-40 *"The railroad improvements at 2665 Leonis Boulevard would result in setbacks less than the required 21 feet."*

The 21-foot building setback is a requirement of Vernon's Comprehensive Zoning Ordinance to provide a safe distance between buildings and utility infrastructure.

AGE 3-3`

32. Page 3.2-40 *"Consistent. Any combination of design options for the Malabar Yard railroad improvements would provide for efficient rail service that minimizes impacts on the local street system."*

There is no evidence to support this statement. The Malabar Yard will bring in empty freight cars to be stored for transportation to a different location. These freight cars are not currently stored at the Malabar Yard or any other location in the City of Vernon. These freight cars will not directly pick up or deliver goods or materials from Vernon businesses. The additional rail traffic, the changes in traffic patterns caused by the closure of 49th Street and the rail extension on 46th Street, will all contribute to increased congestion on the local street system leading to, among other impacts, increased air pollution.

AGE 3-32

Page 9 of 19

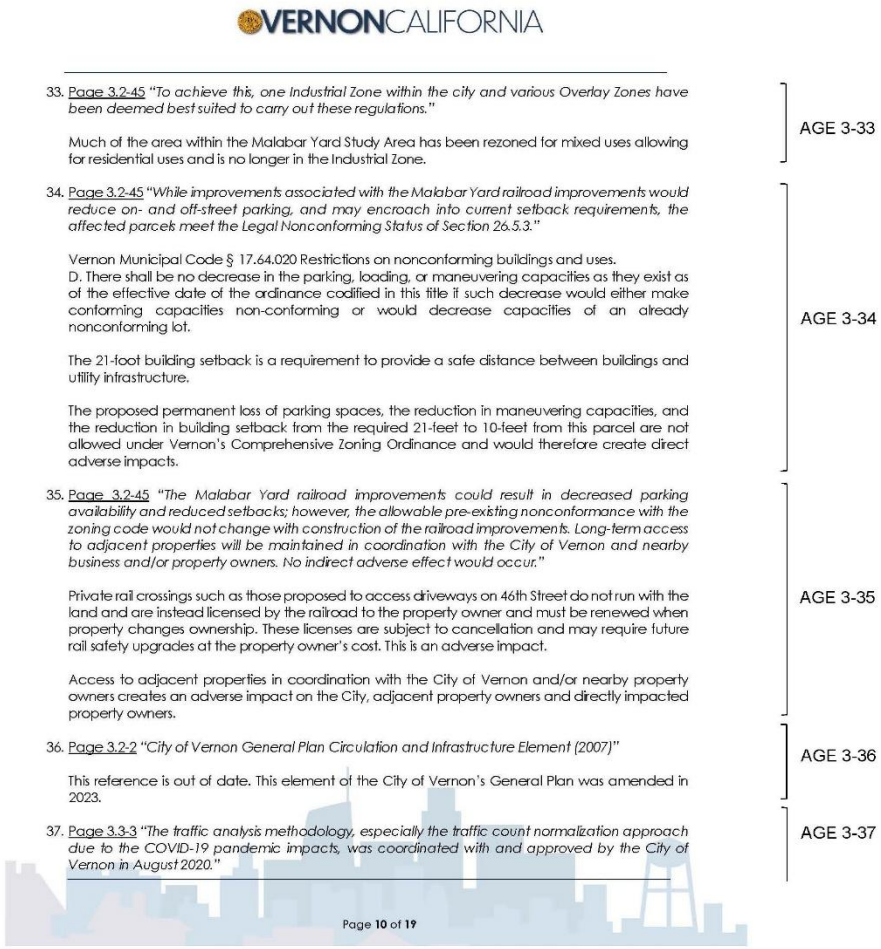
**AGE 3-30** One of the three parcels acknowledged in the comment (APN 6308-007-020) is used as a driveway and no changes to setbacks or parking spaces would occur. Please refer to the Comment AGE 3-29 response related to the closure of 49th Street and consistency with the Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023). As engineering advances, and design reviews are processed with the City of Vernon, Metro will coordinate with affected property owners and the City of Vernon to advance engineering design while maintaining or improving the parcel specific requirements, such as parking or building setback requirements, of the Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023).

**AGE 3-31** Please refer to the Comment AGE 3-29 response related to the closure of 49th Street and consistency with the Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023). As engineering advances, and design reviews are processed with the City of Vernon, Metro will coordinate with affected property owners and the City of Vernon to advance engineering design while maintaining or improving the parcel specific requirements, such as parking or building setback requirements, of the Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023).

**AGE 3-32** BNSF is already serving local customers in the City of Vernon and would continue to do so upon implementation of the Malabar Yard railroad improvements. The existing freight

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| | customers in the city, active freight rail corridors in the city, and BNSF facilities including the Hobart Yard on the north side of the city, Los Angeles Junction on the east side of city, and Malabar Yard on the west side of the city were shared with City staff during the coordination meetings held after the public comment period. Rail cars that serve Vernon customers are currently stored at BNSF Hobart Yard and BNSF Los Angeles Junction in the city.<br><br>As discussed in the Comment AGE 3-A response and in in the Introduction to Volume III of the Final EIS, the consolidation of freight rail service to BNSF customers in Vernon would affect the entire Vernon community by reducing total daily train movements through the City by 3.15 train movements per day. This has corresponding benefits related to air quality (train emissions and traffic). Fewer train movements and relocated "train building" improves citywide circulation. Fewer train movements on the Harbor Subdivision would also increase opportunities for enhanced community connectivity.<br><br>Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements and how impacts would be mitigated via implementation of Malabar Yard Mitigation Measures TR-1 through TR-5. Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered |

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| | in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. There is substantial information provided in the record to support the statement that the Malabar Yard railroad improvements would provide for efficient rail service that minimizes impacts on the local street system. |



VERNONCALIFORNIA

33. Page 3.2-45 *"To achieve this, one Industrial Zone within the city and various Overlay Zones have been deemed best suited to carry out these regulations."*

Much of the area within the Malabar Yard Study Area has been rezoned for mixed uses allowing for residential uses and is no longer in the Industrial Zone.

AGE 3-33

34. Page 3.2-45 *"While improvements associated with the Malabar Yard railroad improvements would reduce on- and off-street parking, and may encroach into current setback requirements, the affected parcels meet the Legal Nonconforming Status of Section 26.5.3."*

Vernon Municipal Code § 17.64.020 Restrictions on nonconforming buildings and uses.
D. There shall be no decrease in the parking, loading, or maneuvering capacities as they exist as of the effective date of the ordinance codified in this title it such decrease would either make conforming capacities non-conforming or would decrease capacities of an already nonconforming lot.

The 21-foot building setback is a requirement to provide a safe distance between buildings and utility infrastructure.

The proposed permanent loss of parking spaces, the reduction in maneuvering capacities, and the reduction in building setback from the required 21-feet to 10-feet from this parcel are not allowed under Vernon's Comprehensive Zoning Ordinance and would therefore create direct adverse impacts.

AGE 3-34

35. Page 3.2-45 *"The Malabar Yard railroad improvements could result in decreased parking availability and reduced setbacks; however, the allowable pre-existing nonconformance with the zoning code would not change with construction of the railroad improvements. Long-term access to adjacent properties will be maintained in coordination with the City of Vernon and nearby business and/or property owners. No indirect adverse effect would occur."*

Private rail crossings such as those proposed to access driveways on 46th Street do not run with the land and are instead licensed by the railroad to the property owner and must be renewed when property changes ownership. These licenses are subject to cancellation and may require future rail safety upgrades at the property owner's cost. This is an adverse impact.

Access to adjacent properties in coordination with the City of Vernon and/or nearby property owners creates an adverse impact on the City, adjacent property owners and directly impacted property owners.

AGE 3-35

36. Page 3.2-2 *"City of Vernon General Plan Circulation and Infrastructure Element (2007)"*

This reference is out of date. This element of the City of Vernon's General Plan was amended in 2023.

AGE 3-36

37. Page 3.3-3 *"The traffic analysis methodology, especially the traffic count normalization approach due to the COVID-19 pandemic impacts, was coordinated with and approved by the City of Vernon in August 2020."*

AGE 3-37

Page 10 of 19

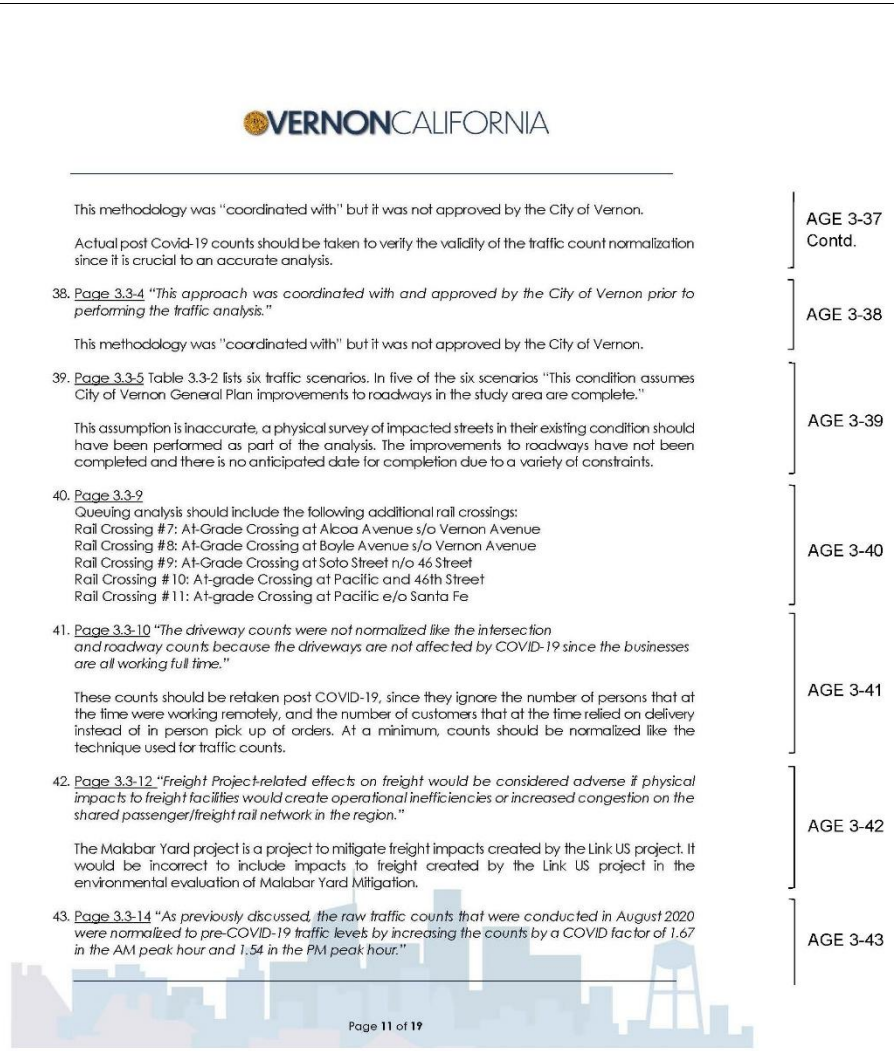
**AGE 3-33** Please refer to Key Issue Response #6 for a discussion of the land use and planning analysis related to existing and future land uses related to the *2023 Vernon Westside Zone Change and General Plan Amendment*.

**AGE 3-34** Please see response to comment AGE 3-29 for a discussion of Malabar Yard railroad improvements conformance with the requirements of the Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023). As engineering advances, and design reviews are processed with the City of Vernon, Metro will coordinate with affected property owners and the City of Vernon to advance engineering design while maintaining or improving the parcel specific requirements, such as parking or building setback requirements, of the Comprehensive Zoning Ordinance of the City of Vernon (Amended 2023).

**AGE 3-35** Metro expects that, to the extent necessary, any future property owners would be able to negotiate successfully for access across the tracks to prevent landlocked parcels. The Malabar Yard railroad improvements include design features to maximize access and connectivity for affected parcels, and adverse effects are not anticipated.

**AGE 3-36** Please refer to Key Issue Response #6 for a discussion of the land use and planning analysis related to existing and future land uses related to the *2023 Vernon Westside Zone Change and General Plan Amendment*.

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| | **AGE 3-37** Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. As discussed in that response, the methodology is an industry standard approach taken during the COVID-19 pandemic and was coordinated with the City of Vernon to obtain feedback on the approach before using the adjusted volumes in the traffic analysis. The traffic volumes presented in the Final EIS Appendix Q Section 3.3 represent the baseline condition at the time the environmental evaluation commenced upon release of the Revised NOI and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes.<br><br>The Final EIS Appendix Q Section 3.3.2 has been revised to remove reference to the City's approval of the traffic impact methodology as follows:<br><br>The traffic analysis methodology, especially the traffic count normalization approach due to the COVID-19 pandemic impacts, was coordinated with ~~and approved by~~ the City of Vernon in August 2020, prior to commencing the analysis. |



VERNONCALIFORNIA

This methodology was "coordinated with" but it was not approved by the City of Vernon.

Actual post Covid-19 counts should be taken to verify the validity of the traffic count normalization since it is crucial to an accurate analysis.

AGE 3-37 Contd.

38. Page 3.3-4 *"This approach was coordinated with and approved by the City of Vernon prior to performing the traffic analysis."*

This methodology was "coordinated with" but it was not approved by the City of Vernon.

AGE 3-38

39. Page 3.3-5 Table 3.3-2 lists six traffic scenarios. In five of the six scenarios "This condition assumes City of Vernon General Plan improvements to roadways in the study area are complete."

This assumption is inaccurate, a physical survey of impacted streets in their existing condition should have been performed as part of the analysis. The improvements to roadways have not been completed and there is no anticipated date for completion due to a variety of constraints.

AGE 3-39

40. Page 3.3-9
Queuing analysis should include the following additional rail crossings:
Rail Crossing #7: At-Grade Crossing at Alcoa Avenue s/o Vernon Avenue
Rail Crossing #8: At-Grade Crossing at Boyle Avenue s/o Vernon Avenue
Rail Crossing #9: At-Grade Crossing at Soto Street n/o 46 Street
Rail Crossing #10: At-grade Crossing at Pacific and 46th Street
Rail Crossing #11: At-grade Crossing at Pacific e/o Santa Fe

AGE 3-40

41. Page 3.3-10 *"The driveway counts were not normalized like the intersection and roadway counts because the driveways are not affected by COVID-19 since the businesses are all working full time."*

These counts should be retaken post COVID-19, since they ignore the number of persons that at the time were working remotely, and the number of customers that at the time relied on delivery instead of in person pick up of orders. At a minimum, counts should be normalized like the technique used for traffic counts.

AGE 3-41

42. Page 3.3-12 *"Freight Project-related effects on freight would be considered adverse if physical impacts to freight facilities would create operational inefficiencies or increased congestion on the shared passenger/freight rail network in the region."*

The Malabar Yard project is a project to mitigate freight impacts created by the Link US project. It would be incorrect to include impacts to freight created by the Link US project in the environmental evaluation of Malabar Yard Mitigation.

AGE 3-42

43. Page 3.3-14 *"As previously discussed, the raw traffic counts that were conducted in August 2020 were normalized to pre-COVID-19 traffic levels by increasing the counts by a COVID factor of 1.67 in the AM peak hour and 1.54 in the PM peak hour."*

AGE 3-43

Page 11 of 19

**AGE 3-38** The Final EIS Appendix Q Section 3.3.2 has been revised to remove reference to the City's approval of the traffic impact methodology as follows:

> The traffic analysis methodology, especially the traffic count normalization approach due to the COVID-19 pandemic impacts, was coordinated with ~~and approved by~~ the City of Vernon in August 2020, prior to commencing the analysis.

**AGE 3-39** A physical survey of potentially affected intersections and roadway segments was conducted as part of the traffic analysis and formed the basis for the Existing (2020) Condition. The Final EIS Appendix Q Section 3.3, Page 3.3-3 states "Traffic counts were performed at all 10 intersections, 11 roadway segments, and affected driveway locations by National Data and Surveying Services in August 2020…The counts conducted included average daily traffic and intersection turn movements during the AM (7:00 AM to 9:00 AM) and PM (4:00 PM to 6:00 PM) peak hours. Counts for vehicle classification, bicyclists, and pedestrians were also performed at the traffic study area intersections."

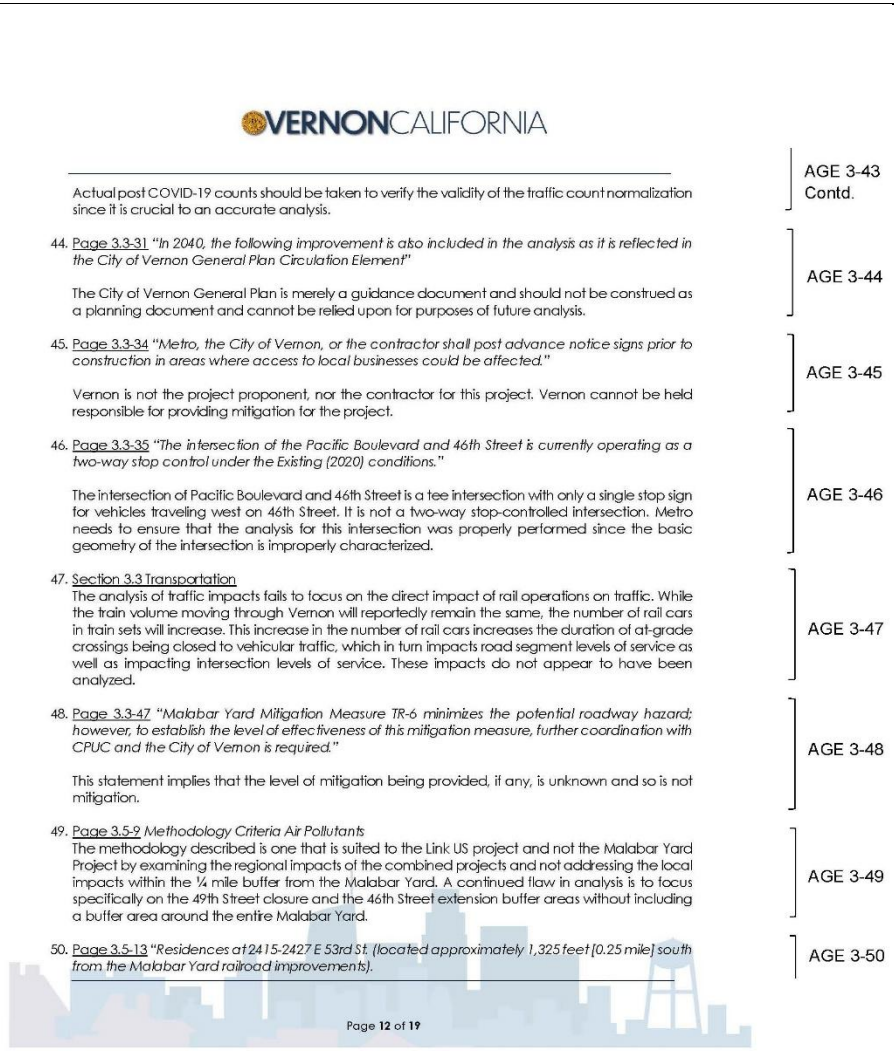
As required by the *Traffic Impact Analysis Report Guidelines* (County of Los Angeles 1997), it is imperative to include the proposed roadway improvements that are listed in the corresponding City's General Plan in the future traffic analysis.

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| | **AGE 3-40** As discussed in Key Issue Response #2, the traffic study area does not include intersections or roadway segments between Soto Street and the Los Angeles Junction because the Malabar Yard railroad improvements would not generate new traffic trips and would only result in localized re distribution of existing traffic (Final EIS Appendix Q Section 3.3, Page 3.3-9). Trains currently operate across Pacific Boulevard/Vernon Avenue, Pacific Avenue and 46th Street, Seville Avenue, Soto Street, 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road. No operational changes along the East Seville Connection and Hobart Yard/Los Angeles Junction Connection routes would be attributable to the proposed Malabar Yard railroad improvements; therefore, traffic analysis was not conducted at those corresponding intersections.<br><br>For 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road, the four additional train movements that would pass these intersections for BNSF to serve customers on the west side of the City of Vernon (Exxon and West Seville), two movements would occur at night (7:30pm to 2:00am) and two movements would occur during the day (6:30am to 2:00pm). Based on the queuing analysis performed and in response to property owner questions raised in January 2025, Metro conducted a calculation to determine the percentage of time in a 24-hour period that the four additional train movements per day (and the two existing trains movements) may block |

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| | access to a driveway on 46th Street, which can also be used to demonstrate the overall percentage of time trains may block an intersection along the East Seville Connection from Soto Street to the Los Angeles Junction where a detailed traffic evaluation was not conducted (44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road). The calculation assumes 6 train movements per day, with a 3,000-foot train plus 500 feet on either end for gate activation and clearing, traveling at 10 miles per hour, and demonstrates that trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Based on consideration of context and intensity, no adverse effect would occur related to traffic delay at the railroad crossing intersections from Soto Street to Los Angeles Junction where 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road are located.<br><br>While Metro recognizes BNSF would operate trains outside the traffic study area, the existing and future operational scenarios included in the environmental evaluation were focused to the geographic areas where physical modifications to infrastructure improvements or new infrastructure would occur. Indirect impacts were also analyzed per the requirements of 40 C.F.R. 1508.8(b) and CEQA Guidelines Section 15358 since indirect impacts, or secondary impacts, are impacts caused by a project that occur later in time or are farther removed in distance but are still reasonably foreseeable. |

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| | **AGE 3-41** The driveway counts were conducted to determine if the proposed roadway improvements would affect access and circulation at or within proximity of existing driveways. Driveway counts do not need to be normalized because feedback received from the business owners was that the COVID-19 pandemic did not impact use of driveways. Based on inputs from the business owners, staff were still working on site, and they did not rely on deliveries instead of in-person pickups. Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements.<br><br>**AGE 3-42** Please refer to Comment AGE 3-A response for the reasons why the Malabar Yard railroad improvements are required. Malabar Yard railroad improvements are proposed as part of Mitigation Measure TR-3 to mitigate the adverse effects that would occur at the BNSF West Bank Yard. Final EIS Appendix Q provides a focused environmental evaluation of the Malabar Yard railroad improvements using similar topics as the Build Alternative and Build Alternative Design Option.<br><br>**AGE 3-43** Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. As |

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| | discussed in that response, the methodology used is an industry standard approach taken during the COVID-19 pandemic and was coordinated with the City of Vernon to obtain feedback on the approach before using the adjusted volumes in the traffic analysis. The traffic volumes presented in the Final EIS Appendix Q Section 3.3, Transportation, represent the baseline condition at the time the environmental evaluation commenced upon release of the Revised NOI and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes. |



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Actual post COVID-19 counts should be taken to verify the validity of the traffic count normalization since it is crucial to an accurate analysis.

AGE 3-43 Contd.

44. Page 3.3-31 *"In 2040, the following improvement is also included in the analysis as it is reflected in the City of Vernon General Plan Circulation Element"*

The City of Vernon General Plan is merely a guidance document and should not be construed as a planning document and cannot be relied upon for purposes of future analysis.

AGE 3-44

45. Page 3.3-34 *"Metro, the City of Vernon, or the contractor shall post advance notice signs prior to construction in areas where access to local businesses could be affected."*

Vernon is not the project proponent, nor the contractor for this project. Vernon cannot be held responsible for providing mitigation for the project.

AGE 3-45

46. Page 3.3-35 *"The intersection of the Pacific Boulevard and 46th Street is currently operating as a two-way stop control under the Existing (2020) conditions."*

The intersection of Pacific Boulevard and 46th Street is a tee intersection with only a single stop sign for vehicles traveling west on 46th Street. It is not a two-way stop-controlled intersection. Metro needs to ensure that the analysis for this intersection was properly performed since the basic geometry of the intersection is improperly characterized.

AGE 3-46

47. Section 3.3 Transportation
The analysis of traffic impacts fails to focus on the direct impact of rail operations on traffic. While the train volume moving through Vernon will reportedly remain the same, the number of rail cars in train sets will increase. This increase in the number of rail cars increases the duration of at-grade crossings being closed to vehicular traffic, which in turn impacts road segment levels of service as well as impacting intersection levels of service. These impacts do not appear to have been analyzed.

AGE 3-47

48. Page 3.3-47 *"Malabar Yard Mitigation Measure TR-6 minimizes the potential roadway hazard; however, to establish the level of effectiveness of this mitigation measure, further coordination with CPUC and the City of Vernon is required."*

This statement implies that the level of mitigation being provided, if any, is unknown and so is not mitigation.

AGE 3-48

49. Page 3.5-9 *Methodology Criteria Air Pollutants*
The methodology described is one that is suited to the Link US project and not the Malabar Yard Project by examining the regional impacts of the combined projects and not addressing the local impacts within the ¼ mile buffer from the Malabar Yard. A continued flaw in analysis is to focus specifically on the 49th Street closure and the 46th Street extension buffer areas without including a buffer area around the entire Malabar Yard.

AGE 3-49

50. Page 3.5-13 *"Residences at 2415-2427 E 53rd St. (located approximately 1,325 feet [0.25 mile] south from the Malabar Yard railroad improvements).*

AGE 3-50

Page 12 of 19

**AGE 3-44** The City of Vernon General Plan was used as planning document because a general plan is a broad, long-range policy document that guides future development and conservation and provides a vision for how a city or county will grow and develop in the future. The General Plan includes the City of Vernon's land use development and circulation goals for its street systems. As mentioned in the Comment AGE 3-39 response, the *Traffic Impact Analysis Report Guidelines* (County of Los Angeles 1997) require proposed roadway improvements that are listed in the corresponding City's General Plan be included in the future traffic analysis.

**AGE 3-45** Malabar Yard Mitigation Measure TR-1 has been updated throughout the Final EIS Appendix Q to remove the City of Vernon as a responsible party, clarifying the City will not provide mitigation for the Malabar Yard railroad improvements.

**AGE 3-46** The intersection of Pacific Blvd and 46th Street is a T intersection with one leg being stop controlled. While this intersection is classified as a "two-way stop controlled" intersection, it is analyzed as a T intersection with one leg being stop controlled. The LOS is reported for the leg with the STOP control instead of the intersection average LOS which includes all three legs of the intersection.

**AGE 3-47** Please refer to the Comment AGE 3-7 response for a discussion related to the reduced train movements on the Harbor

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| | | Subdivision and the net reduction of 3.15 trains per day. As discussed in that response, the proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service and there would be a reduction in total train movements per day and a corresponding improvement to citywide circulation. Trains in the existing condition are 3,000 feet long, and this length would be maintained in the future condition. Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. As discussed in that response, Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. Fewer train movements and relocated "train building" also improves citywide circulation. |
| | **AGE 3-48** | As disclosed in the Final EIS, a new railroad crossing at the intersection of Seville Avenue and 46th Street could cause southbound vehicular traffic to extend across 46th Street. While blocking an intersection is not a legal vehicular maneuver and queuing is not an LOS related traffic impact that constitutes a significant impact/adverse effect under CEQA/NEPA, the increase in queue at this location may introduce a potential roadway hazard. Malabar Yard Mitigation Measure TR-6 minimizes the potential roadway hazard as effectively as possible because it requires roadway design, railroad safety |

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| | devices, and accessibility to be coordinated with the City of Vernon and CPUC. This measure requires Metro and BNSF to coordinate with and obtain approval from the City of Vernon and CPUC for all new and existing at-grade crossing modifications. Malabar Yard Mitigation Measure TR-6 meets the CEQA Guidelines §15370 criteria (b, c, and d), acknowledging that its effectiveness will depend on ongoing coordination with the City of Vernon and CPUC.<br><br>As stated in the Final EIS, coordination activities are expected to be an ongoing process. However, implementation of Malabar Yard Mitigation Measure TR-6 is anticipated to reduce adverse effects related to roadway hazards, emergency response times, and community facilities. Potential roadway safety devices for future implementation may include queue cutter traffic signals or pre-signals at the new railroad crossing on Seville Avenue.<br><br>Under CEQA Guidelines §21002, agencies are required to "avoid or substantially lessen" significant adverse environmental impacts. Mitigation measures that "substantially lessen" these impacts, even if they do not eliminate them entirely, satisfy §21002's mandate. Similarly, *Las Virgenes Homeowners Fed., Inc. v. County of Los Angeles* (1986) 177 Cal.App.3d 300, 309, clarifies that adverse impacts need not be completely avoided or reduced to insignificance if doing so would render the project infeasible. |

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| | | Under NEPA, agencies must provide a "reasonably complete discussion of mitigation measures" (Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 352 [1989]) and discuss such measures in sufficient detail to ensure that environmental consequences have been fairly evaluated. |
| | **AGE 3-49** | No expansion of Malabar Yard is proposed and the physical improvements at Malabar Yard would be limited to the removal of existing asphalt where the at grade crossing on 49th Street currently exists, and replacement of seven 120-foot portions of existing track (840 linear feet of existing track). No trackwork or other infrastructure improvements would extend the entire length of Malabar Yard. The project footprint (maximum extent of design options considered) corresponds to the geographic areas that would be needed for permanent infrastructure improvements and temporary work areas and is therefore an appropriate geographic area for the environmental evaluation. For these reasons, the geographic area is appropriate for the environmental evaluation, and no changes to the geographic area considered in the Draft EIS/SEIR are warranted.<br><br>The commenter suggests a larger buffer area, but the screening distances for the local impacts were calculated from the limits of the project footprint (maximum extent of design options considered) where physical infrastructure improvements are proposed because it would not be accurate to assess impact from the boundary of the existing yard |

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| | where no infrastructure changes are proposed.<br><br>Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling (which includes truck idling) associated with the Malabar Yard railroad improvements. The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from the Los Angeles Junction. The consolidated train movements would result in 78 percent less train movements on the Harbor Subdivision coming from/to the San Bernardino Subdivision. Thus, fewer train movements on the Harbor Subdivision equates to less vehicle idling (including truck idling) at each of the at-grade crossings where sensitive receptors are located, such as the Vernon City School. Because the implementation of the 46th Street Connector would shift freight rail activity away from sensitive receptors, vehicle idling (including truck idling) at Malabar Yard would be so minimal it would not cause a violation of any air quality standard.<br><br>General Conformity is the pollution prevention and control program that requires a federal agency to assure any proposed activity the agency proposes will conform to the purpose of applicable implementation plans and will not interfere with a State or Tribe's ability to attain and maintain the National Ambient Air Quality Standards |

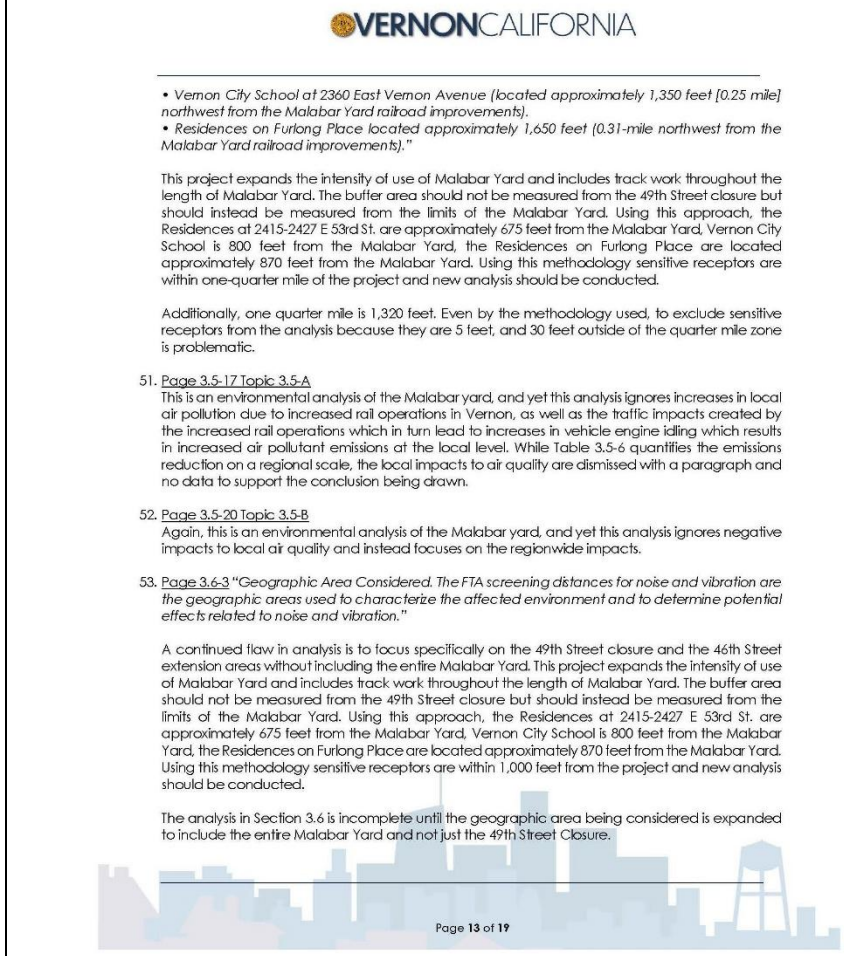
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| | (NAAQS) for air quality, as required under Clean Air Act (CAA) section 176(c).<br><br>The purpose of the General Conformity rule is to ensure that:<br><br>• federal activities do not cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS);<br><br>• actions do not worsen existing violations of the NAAQS; and<br><br>• attainment of the NAAQS is not delayed.<br><br>As demonstrated in the Final EIS pages 3.5-26 to 3.5-34, RONA, and Appendix G of the Final EIS, the annual construction emissions and annual net change in operational emissions for all analysis years generated by the Build Alternative and Malabar Yard railroad improvements, as compared to the No Action Alternative, are below the general conformity de minimis levels for all years of analysis with implementation of mitigation. As such a formal general conformity determination with additional localized analyses are not required. The Build Alternative and Malabar Yard railroad improvements would not interfere with the state's plans to attain and maintain the NAAQS. A detailed $PM_{10}$ and $PM_{2.5}$ hot-spot analysis was not completed because FCAA and 40 CFR 93.116 requirements would be met without an explicit hot-spot analysis.<br><br>As detailed in the Key Issue Response #3, localized air quality impacts were evaluated using the localized significance threshold methodology from SCAQMD. This |

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| | methodology sets a screening level threshold based on the pollutant ($NO_x$, CO, $PM_{10}$, $PM_{2.5}$) and the distance to the nearest air quality sensitive receptor in that source receptor area (location). On-site emissions are calculated and then compared to these thresholds. SCAQMD uses the localized significance threshold (LSTs) to evaluate if projects qualify to be screened out from the requirement to conduct project-specific dispersion modeling. If required, the purpose of dispersion modeling is to demonstrate that a project would not delay attainment of ambient air standards. If a project's on-site emissions are below the LSTs, then no further analysis with dispersion modeling is required. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of an ambient air standard.<br><br>As indicated in Final SEIR, Table 7-31 criteria pollutants would not exceed SCAQMD thresholds during construction or operations and air quality impacts associated with the Malabar Yard railroad improvements would be less than significant. Regarding localized emissions, the Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. On-site construction emissions at Malabar Yard were compared to SCAQMD localized significance threshold (LST)and were found to be below the thresholds for all criteria air pollutants (NOx, CO, $PM_{10}$, $PM_{2.5}$) (see Appendix F of Final EIS Appendix Q). Air quality impacts to sensitive receptors further away from the emission source would be less likely to be |

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| | impacted than those identified through the localized analysis. Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.<br><br>Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Final EIS Appendix Q Section 3.5, Section 3.5.4. In addition to the regional air quality benefits, from a localized perspective, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard.<br><br>The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements |

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| | | would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>The screening areas included in the analysis are correctly applied. For these reasons described above, and discussed in Key Issue Response #3, the analysis is not flawed, and the geographic area considered is appropriate. |
| | **AGE 3-50** | Please refer to Comment AGE 3-49 response above. Malabar Yard would continue to be used by BNSF as a freight railroad facility. Providing BNSF the means to store freight cars at an active rail yard does not expand the intensity of how the freight tracks would be used.<br><br>As discussed in the Comment AGE 3-49 response, no expansion of Malabar Yard is proposed and the physical improvements at Malabar Yard would be limited to the removal of existing asphalt where the at grade crossing on 49th Street currently exists, and replacement of seven 120-foot portions of existing track (840 linear feet of existing track). No trackwork or other infrastructure improvements would extend the entire length of Malabar Yard. The project footprint (maximum extent of design options considered) corresponds to the geographic areas that would be needed for permanent infrastructure improvements and temporary |

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| | work areas and is therefore an appropriate geographic area for the environmental evaluation. Based on the type of infrastructure improvements proposed, a buffer of one-quarter mile is appropriate to identify sensitive receptors for further consideration of potential impacts. The nearest sensitive receptors identified and considered in the air quality analysis for the Malabar Yard railroad improvements were:<br>• Residences at 2415 2427 E 53rd St. (located approximately 1,325 feet [0.25 mile] south of the Malabar Yard railroad improvements),<br>• Vernon City School at 2360 East Vernon Avenue (located approximately 1,350 feet [0.25 mile] northwest of the Malabar Yard railroad improvements), and<br>• Residences on Furlong Place (located approximately 1,650 feet [0.31 mile] northwest of the Malabar Yard railroad improvements). |



VERNONCALIFORNIA

• *Vernon City School at 2360 East Vernon Avenue (located approximately 1,350 feet [0.25 mile] northwest from the Malabar Yard railroad improvements).*
• *Residences on Furlong Place located approximately 1,650 feet (0.31-mile northwest from the Malabar Yard railroad improvements)."*

This project expands the intensity of use of Malabar Yard and includes track work throughout the length of Malabar Yard. The buffer area should not be measured from the 49th Street closure but should instead be measured from the limits of the Malabar Yard. Using this approach, the Residences at 2415-2427 E 53rd St. are approximately 675 feet from the Malabar Yard, Vernon City School is 800 feet from the Malabar Yard, the Residences on Furlong Place are located approximately 870 feet from the Malabar Yard. Using this methodology sensitive receptors are within one-quarter mile of the project and new analysis should be conducted.

Additionally, one quarter mile is 1,320 feet. Even by the methodology used, to exclude sensitive receptors from the analysis because they are 5 feet, and 30 feet outside of the quarter mile zone is problematic.

AGE 3-50 Contd.

51. Page 3.5-17 Topic 3.5-A
This is an environmental analysis of the Malabar yard, and yet this analysis ignores increases in local air pollution due to increased rail operations in Vernon, as well as the traffic impacts created by the increased rail operations which in turn lead to increases in vehicle engine idling which results in increased air pollutant emissions at the local level. While Table 3.5-6 quantifies the emissions reduction on a regional scale, the local impacts to air quality are dismissed with a paragraph and no data to support the conclusion being drawn.

AGE 3-51

52. Page 3.5-20 Topic 3.5-B
Again, this is an environmental analysis of the Malabar yard, and yet this analysis ignores negative impacts to local air quality and instead focuses on the regionwide impacts.

AGE 3-52

53. Page 3.6-3 *"Geographic Area Considered. The FTA screening distances for noise and vibration are the geographic areas used to characterize the affected environment and to determine potential effects related to noise and vibration."*

A continued flaw in analysis is to focus specifically on the 49th Street closure and the 46th Street extension areas without including the entire Malabar Yard. This project expands the intensity of use of Malabar Yard and includes track work throughout the length of Malabar Yard. The buffer area should not be measured from the 49th Street closure but should instead be measured from the limits of the Malabar Yard. Using this approach, the Residences at 2415-2427 E 53rd St. are approximately 675 feet from the Malabar Yard, Vernon City School is 800 feet from the Malabar Yard, the Residences on Furlong Place are located approximately 870 feet from the Malabar Yard. Using this methodology sensitive receptors are within 1,000 feet from the project and new analysis should be conducted.

The analysis in Section 3.6 is incomplete until the geographic area being considered is expanded to include the entire Malabar Yard and not just the 49th Street Closure.

AGE 3-53

Page 13 of 19

**AGE 3-51** As discussed in the Introduction to Volume III of the Final EIS, the consolidation of freight rail service to BNSF customers in Vernon would reduce total daily train movements through the City by 3.15 train movements per day. This has corresponding benefits related to air quality (train emissions and traffic). Fewer train movements and relocated "train building" also improves citywide circulation.

Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. As discussed in that response, Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts.

As indicated in Final SEIR, Table 7-31 criteria pollutants would not exceed SCAQMD thresholds during construction or operations and air quality impacts associated with the Malabar Yard railroad improvements would be less than significant. Regarding localized emissions, the Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. On-site construction emissions at Malabar Yard were compared to SCAQMD localized significance threshold (LST) sand were found to be below the thresholds for all criteria air pollutants (NOx, CO, $PM_{10}$, $PM_{2.5}$) (see Appendix F of Final EIS Appendix Q). Air quality impacts to

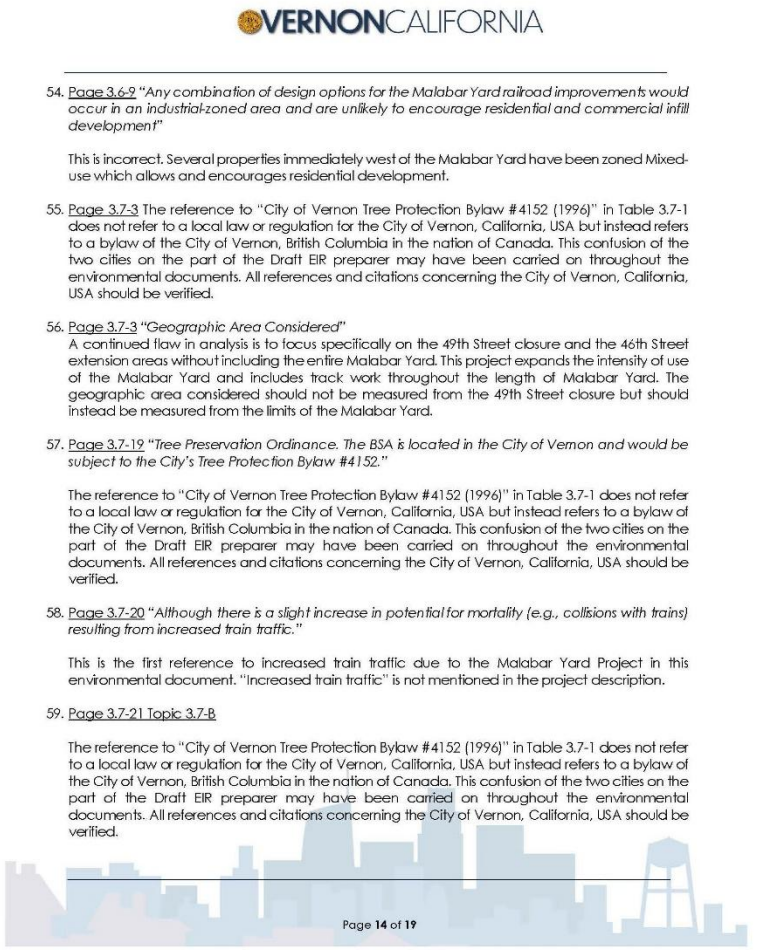
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| | sensitive receptors further away from the emission source would be less likely to be impacted than those identified through the localized analysis. Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.<br><br>Please also refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling.<br><br>The regional benefits to air quality and GHG emissions as a result of reduced emissions are presented in the Final EIS Appendix Q Section 3.5, Page 3.5-20. From a localized perspective, the beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air |

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| | emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*. |
| | **AGE 3-52** GHG emissions are global in nature as climate change impacts occur worldwide. It would not be appropriate to attribute specific localized impacts as a result of Project-related GHG emissions. As specified in the CEQA and Climate Change Advisory from the Governor's Office of Planning and Research, "the CEQA Guidelines generally address GHG emissions as a cumulative impact due to the global nature of climate change." When GHG emissions are released into the atmosphere, they are not contained locally and therefore the location on where it is emitted is not as important as compared to criteria air pollutants or air toxics (Center for Biological Diversity v. Department of Fish & Wildlife, 62 Cal.4th at pp. 219-220). NEPA Guidance on Consideration of Greenhouse Gas Emissions and Climate Change (2023) includes similar provisions in the regulatory framework section.<br><br>As discussed in Key Issue Response #3, when the commenters request a more detailed analysis of idling emissions in Vernon, they are effectively requesting a dispersion modeling analysis. Dispersion modeling uses the emissions from a source and localized atmospheric processes to predict concentrations of a pollutant at specific locations downwind from the source. |

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| | | This model is typically used to demonstrate project compliance with the NAAQS or for large stationary sources (e.g. power plants). This level of detailed analysis is not necessary at Malabar Yard because the vehicle idling emissions would be so minimal that it would not cause a violation of any air quality standard. Per the EPA's PM Hot-Spot Guidance and FHWA's Guidance on Mobile Source Air Toxic Analysis, this type of project would not qualify for quantitative dispersion modeling and therefore would not have the potential to result in significant localized emissions. Key Issue Response #3 concludes that since the Malabar Yard railroad improvements would not worsen LOS and the Project does not meet either of the described criteria, dispersion modeling is not required and localized air quality impacts from vehicle idling would be less than significant. |
| | **AGE 3-53** | Please refer to the Comment AGE 3-49 response regarding limits of the project footprint (maximum extent of design options considered) and the existing use of Malabar Yard as a current freight yard.<br><br>As discussed in the Comment AGE 3-49 response, no expansion of Malabar Yard is proposed and the physical improvements at Malabar Yard would be limited to the removal of existing asphalt where the at grade crossing on 49th Street currently exists, and replacement of seven 120-foot portions of existing track (840 linear feet of existing track). No trackwork or other infrastructure improvements would extend the entire length of Malabar Yard. The project footprint |

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| | (maximum extent of design options considered) corresponds to the geographic areas that would be needed for permanent infrastructure improvements and temporary work areas and is therefore an appropriate geographic area for the environmental evaluation.<br><br>For noise and vibration analysis, the screening distances (Section 4.3 of the FTA Transit Noise and Vibration Impact Assessment Manual, FTA 2018) were calculated from the project footprint (maximum extent of design options considered) where changes to infrastructure would occur. No noise or vibration changes would be experienced where there are no proposed changes to the infrastructure. This was disclosed in the Final EIS as part of the noise and vibration methodology which identified a 1,000-foot buffer from the project footprint for the proposed Malabar Yard railroad improvements or within 650 feet from the project footprint for the proposed Malabar Yard railroad improvements (with obstructions) (refer to Final EIS Appendix Q Section 3.6, Figure 3.6-1). This screening assessment was performed and, per the FTA and FRA guidelines, no noise sensitive land uses (including the residences at 2415-2427 E 53rd St, Vernon City School, Holy Angels Church of the Deaf, and the residences on Furlong Place) are located within 1,000 feet of the project footprint (without obstructions) or within 650 feet of the project footprint (with obstructions) (refer to Final EIS Appendix Q Section 3.6, Figure 3.6 1). |

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| | While it is true that the yard would accommodate storage, the yard itself is not being changed as part of the Malabar Yard railroad improvements. Therefore, it would not be correct to assess potential impacts from the limits of the existing yard where no infrastructure changes are proposed and would be inconsistent with FTA and FRA methodologies for screening level assessments. For these reasons, the screening areas included in the noise and vibration analysis are correctly applied and no further analysis is warranted. |



VERNONCALIFORNIA

54. Page 3.6-9 *"Any combination of design options for the Malabar Yard railroad improvements would occur in an industrial-zoned area and are unlikely to encourage residential and commercial infill development"*

This is incorrect. Several properties immediately west of the Malabar Yard have been zoned Mixed-use which allows and encourages residential development.

AGE 3-54

55. Page 3.7-3 The reference to "City of Vernon Tree Protection Bylaw #4152 (1996)" in Table 3.7-1 does not refer to a local law or regulation for the City of Vernon, California, USA but instead refers to a bylaw of the City of Vernon, British Columbia in the nation of Canada. This confusion of the two cities on the part of the Draft EIR preparer may have been carried on throughout the environmental documents. All references and citations concerning the City of Vernon, California, USA should be verified.

AGE 3-55

56. Page 3.7-3 *"Geographic Area Considered"*
A continued flaw in analysis is to focus specifically on the 49th Street closure and the 46th Street extension areas without including the entire Malabar Yard. This project expands the intensity of use of the Malabar Yard and includes track work throughout the length of Malabar Yard. The geographic area considered should not be measured from the 49th Street closure but should instead be measured from the limits of the Malabar Yard.

AGE 3-56

57. Page 3.7-19 *"Tree Preservation Ordinance. The BSA is located in the City of Vernon and would be subject to the City's Tree Protection Bylaw #4152."*

The reference to "City of Vernon Tree Protection Bylaw #4152 (1996)" in Table 3.7-1 does not refer to a local law or regulation for the City of Vernon, California, USA but instead refers to a bylaw of the City of Vernon, British Columbia in the nation of Canada. This confusion of the two cities on the part of the Draft EIR preparer may have been carried on throughout the environmental documents. All references and citations concerning the City of Vernon, California, USA should be verified.

AGE 3-57

58. Page 3.7-20 *"Although there is a slight increase in potential for mortality (e.g., collisions with trains) resulting from increased train traffic."*

This is the first reference to increased train traffic due to the Malabar Yard Project in this environmental document. "Increased train traffic" is not mentioned in the project description.

AGE 3-58

59. Page 3.7-21 Topic 3.7-B

The reference to "City of Vernon Tree Protection Bylaw #4152 (1996)" in Table 3.7-1 does not refer to a local law or regulation for the City of Vernon, California, USA but instead refers to a bylaw of the City of Vernon, British Columbia in the nation of Canada. This confusion of the two cities on the part of the Draft EIR preparer may have been carried on throughout the environmental documents. All references and citations concerning the City of Vernon, California, USA should be verified.

AGE 3-59

Page 14 of 19

**AGE 3-54** The analysis of proposed infrastructure improvements is correct. The Malabar Yard railroad improvements would not encourage residential and commercial infill development.

As disclosed in the Draft PEIR for the *2023 Vernon Westside Zone Change and General Plan Amendment*, the exact nature of Vernon Westside Zone Change development through 2040 is not known and actual rate of development will depend on market conditions. Under CEQA guidelines, an analysis is not required to determine impacts for hypothetical conditions but rather on physical environmental conditions as they exist at the time of the Notice of Preparation. As such, the noise and vibration impacts are not assessed for areas of potential future developments unless they are included in the existing baseline conditions.

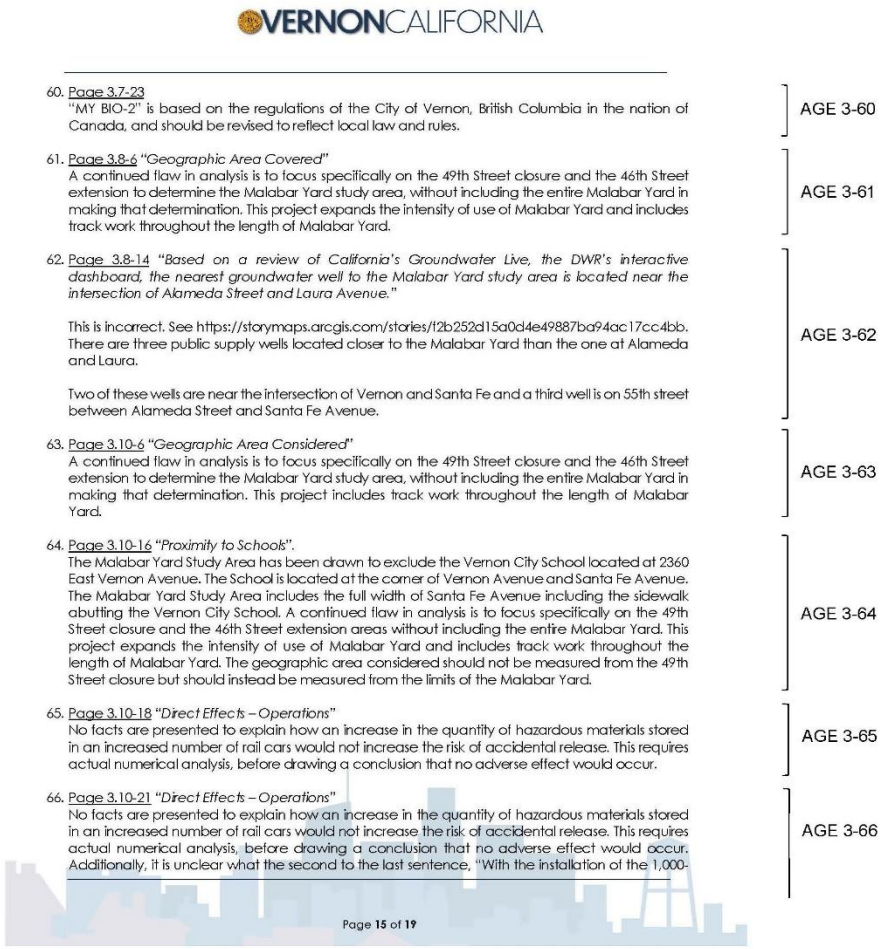
Key Issue Response #6 includes a consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment*. Based on the analysis performed in the Final EIS Volume III Introduction Table 5, the Malabar Yard railroad improvements were determined to be consistent with the goals and policies within the *2023 Vernon Westside Zone Change and General Plan Amendment*. Therefore, no conflict would occur with implementation of the Malabar Yard railroad improvements.

As discussed in Comment AGE 3-4 response, Metro's coordination activities with

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| | | the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Final EIS. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. |
| | **AGE 3-55** | The inclusion of references to policies from Vernon, British Columbia, Canada, was a clear oversight. The reference to the "City of Vernon Tree Protection Bylaw #4152 (1996)" for the City of Vernon, British Columbia has been removed from the Final EIS Section ES.0, Final SEIR, Final EIS Appendix Q Section ES.0, and Final EIS Appendix Q Section 3.7. Malabar Yard Mitigation Measure BIO-2 was updated in the locations listed above to refer to the City of Vernon's Tree Ordinance (Code of Ordinances, Chapter 12.24, Street Trees), in California. All other references and citations regarding the City of Vernon were reviewed and verified accurate. The potential impacts and conclusions related to tree removal disclosed in the Final EIS are still valid. Malabar Yard Mitigation Measure BIO-2 requires the contractor to obtain a permit for impacts to any City-owned tree protected under the City |

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| | | of Vernon's Tree Ordinance (Code of Ordinances, Chapter 12.24, Street Trees). |
| | **AGE 3-56** | As identified in Final EIS Appendix Q Section 3.7, the geographic boundary used to evaluate biological and wetland resources is referred to as the Biological Study Area. The Biological Study Area corresponds to the project footprint for the design options considered at each location (49th Street and 46th Street) and is inclusive of where all project effects including noise, vibration, dust, and all other construction activities that may affect biological resources may occur. The commenter has not shown how any use of the northern or southern portion of Malabar Yard could result in adverse effects to biological resources when the tracks are already located there. |
| | **AGE 3-57** | Please refer to the Comment AGE 3-55 response, which states that all references to the "City of Vernon Tree Protection Bylaw #4152 (1996)" for the City of Vernon have been removed from the Final EIS and replaced to refer to the City of Vernon's Tree Ordinance (Code of Ordinances, Chapter 12.24, Street Trees). |
| | **AGE 3-58** | The increase in train movements would only occur along the 1,000-foot segment of new track where trains do not currently operate. Key Issue Response #2 includes clarifications to the information presented in the Final EIS Appendix Q Section 2 regarding freight railroad operations. As shown in Table 2 of Key Issue Response #2, 8 daily train movements occur on the affected routes considered (Figure 7), and in |

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| | the future condition, a total of 4.85 daily train movements would occur on these same affected routes (Figure 8). As shown in Table 2, the total daily frequency of train movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night. Figures 7 and 8 depict the existing and future daily train movements on the affected routes. |
| | **AGE 3-59** Please refer to the Comment AGE 3-55 response, which states that all references to the "City of Vernon Tree Protection Bylaw #4152 (1996)" for the City of Vernon have been removed from the Final EIS and replaced to refer to the City of Vernon's Tree Ordinance (Code of Ordinances, Chapter 12.24, Street Trees). |



VERNONCALIFORNIA

60. Page 3.7-23
"MY BIO-2" is based on the regulations of the City of Vernon, British Columbia in the nation of Canada, and should be revised to reflect local law and rules.

AGE 3-60

61. Page 3.8-6 *"Geographic Area Covered"*
A continued flaw in analysis is to focus specifically on the 49th Street closure and the 46th Street extension to determine the Malabar Yard study area, without including the entire Malabar Yard in making that determination. This project expands the intensity of use of Malabar Yard and includes track work throughout the length of Malabar Yard.

AGE 3-61

62. Page 3.8-14 *"Based on a review of California's Groundwater Live, the DWR's interactive dashboard, the nearest groundwater well to the Malabar Yard study area is located near the intersection of Alameda Street and Laura Avenue."*

This is incorrect. See https://storymaps.arcgis.com/stories/12b252d15a0d4e49887ba94ac17cc4bb. There are three public supply wells located closer to the Malabar Yard than the one at Alameda and Laura.

Two of these wells are near the intersection of Vernon and Santa Fe and a third well is on 55th street between Alameda Street and Santa Fe Avenue.

AGE 3-62

63. Page 3.10-6 *"Geographic Area Considered"*
A continued flaw in analysis is to focus specifically on the 49th Street closure and the 46th Street extension to determine the Malabar Yard study area, without including the entire Malabar Yard in making that determination. This project includes track work throughout the length of Malabar Yard.

AGE 3-63

64. Page 3.10-16 *"Proximity to Schools"*.
The Malabar Yard Study Area has been drawn to exclude the Vernon City School located at 2360 East Vernon Avenue. The School is located at the corner of Vernon Avenue and Santa Fe Avenue. The Malabar Yard Study Area includes the full width of Santa Fe Avenue including the sidewalk abutting the Vernon City School. A continued flaw in analysis is to focus specifically on the 49th Street closure and the 46th Street extension areas without including the entire Malabar Yard. This project expands the intensity of use of Malabar Yard and includes track work throughout the length of Malabar Yard. The geographic area considered should not be measured from the 49th Street closure but should instead be measured from the limits of the Malabar Yard.

AGE 3-64

65. Page 3.10-18 *"Direct Effects – Operations"*
No facts are presented to explain how an increase in the quantity of hazardous materials stored in an increased number of rail cars would not increase the risk of accidental release. This requires actual numerical analysis, before drawing a conclusion that no adverse effect would occur.

AGE 3-65

66. Page 3.10-21 *"Direct Effects – Operations"*
No facts are presented to explain how an increase in the quantity of hazardous materials stored in an increased number of rail cars would not increase the risk of accidental release. This requires actual numerical analysis, before drawing a conclusion that no adverse effect would occur. Additionally, it is unclear what the second to the last sentence, "With the installation of the 1,000-

AGE 3-66

Page 15 of 19

**AGE 3-60** Please refer to the Comment AGE 3-55 response, which states that all references to the "City of Vernon Tree Protection Bylaw #4152 (1996)" for the City of Vernon have been removed from the Final EIS and replaced to refer to the City of Vernon's Tree Ordinance (Code of Ordinances, Chapter 12.24, Street Trees).

**AGE 3-61** Please refer to the Comment AGE 3-49 response related to the project footprint and geographic area considered and the continued use of Malabar Yard for freight rail operations. The commenter has not shown how any use of the northern or southern portion of Malabar Yard could result in adverse effects to water resources when the tracks are already located there.

**AGE 3-62** In response to this comment, California's Groundwater Live: Well Infrastructure (arcgis.com) was consulted, confirming there are three public supply wells located closer to the Malabar Yard study area than the one at Alameda Street and Laura Avenue. Final EIS Appendix Q Section 3.8 has been updated to include these three public supply wells in the affected environment. In consideration of the new information presented by the commenter, no changes to the conclusions in the Final EIS would occur because these wells would be protected in a similar manner as other known or observed wells. No adverse effect would occur with implementation of Malabar Yard Mitigation Measures HWQ-2 and HWQ-3.

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| | **AGE 3-63** Please refer to the Comment AGE 3-49 response related to the project footprint and geographic area considered. As stated in that response, the project footprint corresponds to the areas that would be needed for permanent infrastructure improvements and temporary work areas and is therefore an appropriate geographic area for the environmental evaluation.<br><br>**AGE 3-64** The Malabar Yard Study Area was not drawn to intentionally omit certain land uses. Please refer to the Comment AGE 3-4 response for a summary of the evaluation pertinent to the Vernon City School. Please refer to the Comment AGE 3-49 response related to the project footprint and geographic area considered and the continued use of Malabar Yard for freight rail operations.<br><br>The Vernon City School was included in environmental evaluation of the Malabar Yard railroad improvements. As noted on Final EIS Appendix Q Section 3.10, Page 3.10-16 and shown in Figure 3.10-1, Vernon City School at 2360 East Vernon Avenue, is located outside of the 0.25-mile buffer from the project footprint for the Malabar Yard railroad improvements. The 0.25-mile buffer is the boundary used to determine potential impacts related to the release of hazardous emissions or handling of hazardous waste and materials. This is an industry-standard buffer appropriately utilized in CEQA/NEPA documentation to identify current or historical conditions that could cause soil, groundwater, or other contamination on or adjacent to a property per the American |

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| | | Society of Testing and Materials (ASTM) standard practice ASTM E 1527-13 (ASTM 2013). The 0.25-mile search radius also relates to the maximum distance that groundwater contamination is likely to travel for the majority of sites with groundwater contamination. |
| | **AGE 3-65** | The 49th Street Closure would accommodate up to 3,350 feet of freight rail track storage capacity for BNSF to store empty bare tables at BNSF Malabar Yard. None of the available information leads to any foreseeable prediction that BNSF would store additional railcars carrying hazardous materials at Malabar Yard. A numerical analysis was not performed because it would include zero additional cars. Additional freight rail track storage would be accommodated and no change to existing operations related to hazardous materials management would occur. While storage would be accommodated at Malabar Yard, it is assumed that BNSF would continue to implement standard operating procedures when operating freight trains at Malabar Yard; thereby reducing the risk of hazardous materials release. The 46th Street Connector would provide a 1,000-foot connection to facilitate freight movements between two existing track sections that are currently active and operational. No change to hazardous materials management or increased risk or hazardous materials release would occur. As standard operating procedures are implemented across the system, the change facilitated by the Project would not be substantial. |

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| | **AGE 3-66** Please refer to the Comment AGE 3-65 response. The Final EIS Appendix Q Section 3.10.4 has been revised to refer to the Spur Line east of Pacific Boulevard as follows:<br><br>With the installation of the 1,000-foot connector track and realignment of the existing spur track east of Pacific Boulevard, no impacts related to release of hazardous materials is expected due to the heavy presence of existing freight rail operations in the immediate surrounding area. Therefore, no direct adverse effect would occur. |



VERNONCALIFORNIA

foot connector track and realignment of the existing is expected due to the heavy presence of existing freight rail operations in the immediate surrounding area" means. — AGE 3-66 Contd.

67. Page 3.10-21 *"Indirect Effects"*
Two unsupported claims are made to draw the conclusion that "No Indirect adverse effect would occur." The first claim is that if operations are handled in accordance with applicable regulations a hazardous release is not expected. Based on the history and frequency of hazardous releases from railroads this is a false claim. The second claim is that an increase in rail activity involving hazardous materials does not increase the likelihood of release. No data is presented to support either of these claims. — AGE 3-67

68. Page 3.11-17 *"Indirect Effects – Construction and Operations"*
This section ignores the increases in energy consumption from idling traffic. According to Page 2-4 "North Entrance" "The foreseeable length of future trains operating on the 46th Street Connector could range from 2,000 feet to 4,000 feet. To serve customers on the existing spur line track east of Pacific Boulevard and south of 46th Street, the Pacific Boulevard and Vernon Avenue at grade crossings could be occupied for "head-end moves" as necessary to facilitate continued freight operations on the existing spur line"

This project will block 49th Street as well as Pacific Avenue and Vernon Avenue by effectively cutting off east-west traffic through the city for extended periods of time. This will also impact north and south bound traffic along Santa Fe as vehicles stuck at the rail crossings queue through the intersections. In addition to other impacts this will increase fuel consumption due to excessive idling time created by the changes to rail operations that the Malabar Yard project will allow. — AGE 3-68

69. Page 3.13-1 *"Metro's Relocation Assistance Program"*
Why isn't Metro just purchasing the BNSF property adjacent to Union Station instead of expanding the Malabar Yard and in so doing creating several environmental and economic burdens on the residents, businesses and workers of Vernon? Shouldn't BNSF be treated the same as other businesses being impact by Link US? Why is the loss of BNSF storage being treated as something that requires "mitigation" through the Malabar Yard Project? Only environmental impacts are mitigated. The taking of property is compensated through payment not mitigation. — AGE 3-69

70. Page 3.13-2 *"Geographic Study Area"*
The Malabar Yard Project impacts a local area and is the mitigation being proposed and economic impact being created by the larger Link US. The Malabar Yard project has its own environmental evaluation, a part of, but separate from the Link US environmental evaluation. Therefore, the economic and fiscal impacts of the Malabar Yard Project should be evaluated at the local level and not the county level. — AGE 3-70

71. Page 3.13-5 *"Land Use"*
As stated previously, much of the area within the Malabar Yard Study Area has been rezoned for mixed uses allowing for residential uses and is no longer in the Industrial Zone. — AGE 3-71

72. Page 3.13-6 *"Businesses subject to displacement would be referred to potential and/or suitable replacement sites pursuant to Metro's Relocation Assistance Program."*
Why isn't BNSF being referred to Metro's Relocation Assistance Program instead of displacing — AGE 3-72

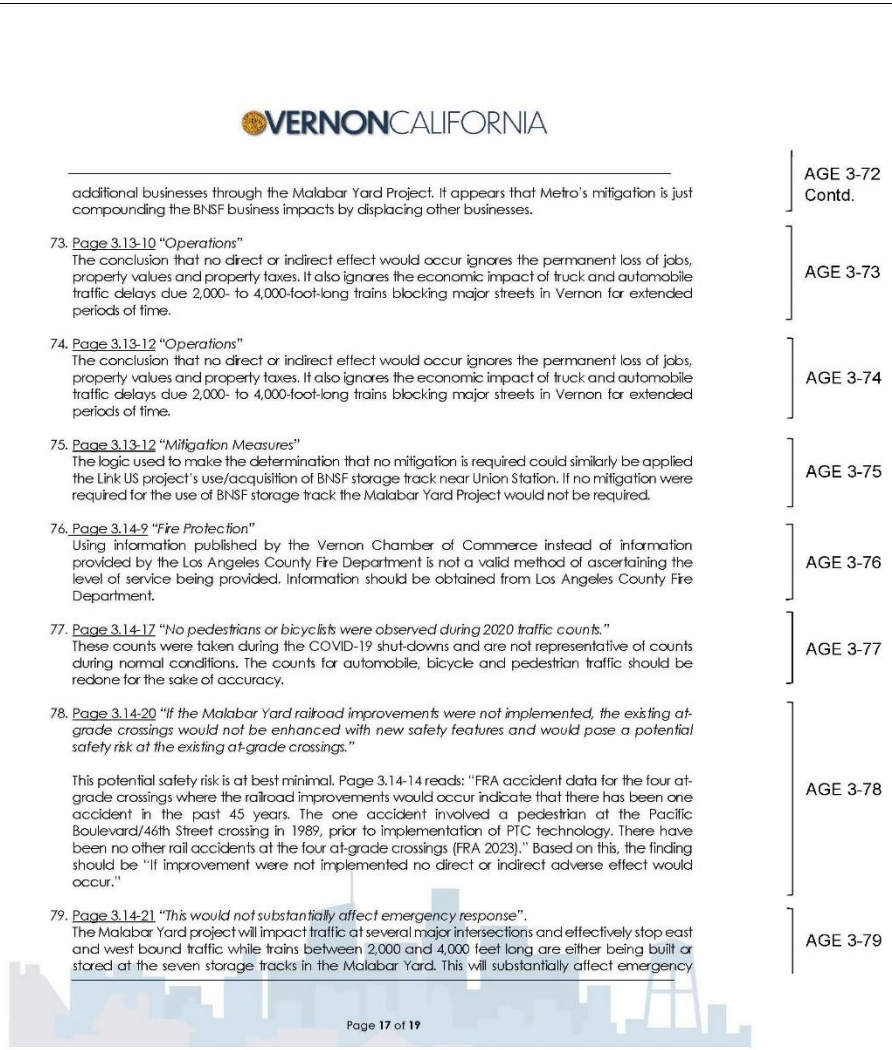
Page 16 of 19

**AGE 3-67** Please refer to the Comment AGE 3-65 response for a discussion of the risk of hazardous materials releases at Malabar Yard. As discussed in that response, no increase in risk of hazardous materials releases would occur. Standard operating procedures would be implemented when operating freight trains at Malabar Yard and affected routes; similar to how risk of hazardous materials release is managed in the existing condition. The 46th Street Connector would provide a 1,000-foot connection to facilitate freight movements between two existing track sections that are currently active and operational. No change to hazardous materials management or increased risk or hazardous materials release would occur. As standard operating procedures are implemented across the system, the change facilitated by the Project would not be substantial.

**AGE 3-68** Please refer to the Comment AGE 3-11 response regarding connectivity and Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. Final EIS Appendix Q Section 2.0, Table 2-1 shows fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard. In consideration of the train movements shown in Final EIS Appendix Q Section 2.0, Table 2-2, and the clarifications are also provided in Volume III Introduction under Key Issue Response #2 (net reduction of 3.15 trains per

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| | | day). The 46th Street Connector would facilitate consolidated freight service from the Los Angeles Junction.<br><br>Based on the information above, quantification of fuel consumption from idling vehicles is not warranted because, as the Final EIS discloses, fuel consumption will decrease. |
| | **AGE 3-69** | Please refer to the Comment AGE 3-A response. CEQA and NEPA both require consideration of mitigation for significant environmental impacts/adverse effects. |
| | **AGE 3-70** | The Malabar Yard railroad improvements would generate indirect effects (supplier spending effects) and induced effects (household spending effects) on the economy beyond the City of Vernon. The City of Vernon is intrinsically linked to and dependent on the larger LA County economy. The Final EIS analysis was prepared using the IMPLAN® input-output model to estimate the economic impacts of the Malabar Yard railroad improvements. This is an industry-standard approach; however, IMPLAN does not have city level data. To model the economic impacts for just the City of Vernon it would need to be done by aggregating the zip codes that make up the city. While IMPLAN could model economic impacts of the singular zip code of the City of Vernon, a single zip code can rarely be considered a functional economy. Not only is there a higher probability of non-disclosure with the data at the ZIP code level, there also is a significantly less amount of raw data available in general at the ZIP code |

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| | level. Thus, the economic and fiscal impacts of the Malabar Yard railroad improvements would be greatly underestimated if they were calculated at the city level. |
| | **AGE 3-71** Please refer to Key Issue Response #6 for a discussion of the Malabar Yard railroad improvements' consistency analysis with the *2023 Vernon Westside Zone Change and General Plan Amendment*. Table 3 of Key Issue Response #6 includes a consistency analysis of the amended text of *2023 Vernon Westside Zone Change and General Plan Amendment*. As discussed in Key Issue Response #6, no conflict would occur with implementation of the Malabar Yard railroad improvements. |
| | **AGE 3-72** CEQA and NEPA both require consideration of mitigation for significant environmental impacts/adverse effects. As discussed in the Comment AGE 3-A response, paying BNSF monetary compensation to remove storage tracks at the BNSF West Bank Yard rather than mitigating Project-related effects with physical infrastructure improvements would not preserve current levels of freight rail operations in accordance with the provisions of the purpose and need of the Link US Project. |



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additional businesses through the Malabar Yard Project. It appears that Metro's mitigation is just compounding the BNSF business impacts by displacing other businesses.

AGE 3-72 Contd.

73. Page 3.13-10 *"Operations"*
The conclusion that no direct or indirect effect would occur ignores the permanent loss of jobs, property values and property taxes. It also ignores the economic impact of truck and automobile traffic delays due 2,000- to 4,000-foot-long trains blocking major streets in Vernon for extended periods of time.

AGE 3-73

74. Page 3.13-12 *"Operations"*
The conclusion that no direct or indirect effect would occur ignores the permanent loss of jobs, property values and property taxes. It also ignores the economic impact of truck and automobile traffic delays due 2,000- to 4,000-foot-long trains blocking major streets in Vernon for extended periods of time.

AGE 3-74

75. Page 3.13-12 *"Mitigation Measures"*
The logic used to make the determination that no mitigation is required could similarly be applied the Link US project's use/acquisition of BNSF storage track near Union Station. If no mitigation were required for the use of BNSF storage track the Malabar Yard Project would not be required.

AGE 3-75

76. Page 3.14-9 *"Fire Protection"*
Using information published by the Vernon Chamber of Commerce instead of information provided by the Los Angeles County Fire Department is not a valid method of ascertaining the level of service being provided. Information should be obtained from Los Angeles County Fire Department.

AGE 3-76

77. Page 3.14-17 *"No pedestrians or bicyclists were observed during 2020 traffic counts."*
These counts were taken during the COVID-19 shut-downs and are not representative of counts during normal conditions. The counts for automobile, bicycle and pedestrian traffic should be redone for the sake of accuracy.

AGE 3-77

78. Page 3.14-20 *"If the Malabar Yard railroad improvements were not implemented, the existing at-grade crossings would not be enhanced with new safety features and would pose a potential safety risk at the existing at-grade crossings."*

This potential safety risk is at best minimal. Page 3.14-14 reads: "FRA accident data for the four at-grade crossings where the railroad improvements would occur indicate that there has been one accident in the past 45 years. The one accident involved a pedestrian at the Pacific Boulevard/46th Street crossing in 1989, prior to implementation of PTC technology. There have been no other rail accidents at the four at-grade crossings (FRA 2023)." Based on this, the finding should be "If improvement were not implemented no direct or indirect adverse effect would occur."

AGE 3-78

79. Page 3.14-21 *"This would not substantially affect emergency response"*.
The Malabar Yard project will impact traffic at several major intersections and effectively stop east and west bound traffic while trains between 2,000 and 4,000 feet long are either being built or stored at the seven storage tracks in the Malabar Yard. This will substantially affect emergency

AGE 3-79

Page 17 of 19

**AGE 3-73** An analysis of economic and fiscal impacts on local and regional economies that would result from implementation of the Malabar Yard railroad improvements can be found in Final EIS Appendix Q Section 3.13.

As demonstrated in Final EIS Appendix Q Section 3.13, a balanced analysis was performed to determine the conclusions presented based on the local and regional impacts from short term construction spending, as well as long term impacts related to potential job displacement and lost property tax revenues due to the required ROW acquisitions.

*Construction Expenditures* - In Final EIS Appendix Q Section 3.13, it is noted that implementation of any combination of design options for the Malabar Yard railroad improvements would generate employment, labor income, and tax revenues during construction as described below:

- Design Option 1 is expected to generate 143 temporary jobs (representing $9.4 million in labor income) during the construction period. It is expected to create $25.6 million in output (including $13.8 million in value added) and $3.3 million in total federal, state, and local tax revenues.
- Design Option 2 is expected to generate 151 temporary jobs (representing $9.7 million in labor income) during the construction period. It is expected to create $27.1 million in output (including $14.5 million in value added) and $3.5

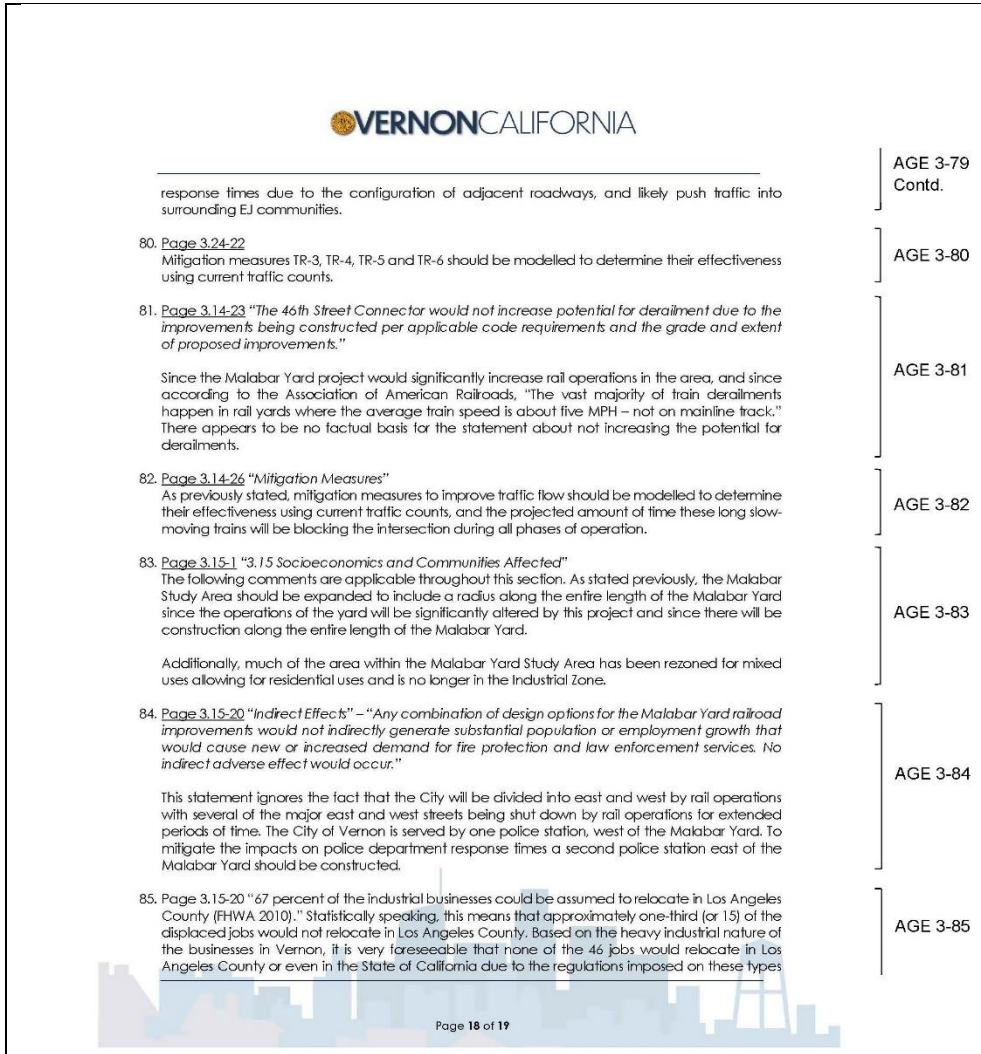
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| | million in total federal, state, and local tax revenues.<br><br>*Potential Job Displacement and Lost Property Tax Revenues* – Final EIS Appendix Q Section 3.13, Page 3.13-6 indicates ROW acquisitions required for Design Option 1 of the Malabar Yard railroad improvements would displace approximately 48,872 square feet of building space, resulting in up to $61,001 property tax losses to the county and city, and up to 46 jobs that could be displaced. For Design Option 2 of the Malabar Yard railroad improvements, the displacement of 9,711 square feet of building space would result in $3,641 of property tax losses to the county and city annually and up to nine jobs could be displaced. The number of displaced jobs was estimated based on an industry-standard approach using the total building square footage displaced and the average building square feet per industrial job (1,061.5). The analysis and conclusions are based on an industry-standard approach and the assumption that some relocation of businesses would occur.<br><br>The commenter provides no basis or substantive input for how economic impacts of truck and automobile traffic delays could be quantified. An economic impact analysis of truck and automobile traffic delays was not performed as the methodology and results would be highly speculative.<br><br>Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential |

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| | queuing associated with implementation of Malabar Yard railroad improvements. The responses above note that train lengths would be 3,000 feet in length and Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. |
| | **AGE 3-74** Please refer to the Comment AGE 3-73 response for a discussion of the economic and fiscal impacts on local and regional economies that would result from implementation of the Malabar Yard railroad improvements, train lengths, and mitigation measures related to traffic. |
| | **AGE 3-75** The conclusion on Final EIS Appendix Q Section 3.13, Page 3.13-12 is specific to the economic and fiscal impact analysis prepared for the Malabar Yard railroad improvements. The Malabar Yard railroad improvements would not result in any adverse economic effects, so mitigation is not warranted. For that reason, the Final EIS concluded that "no mitigation is required." In contrast, the Link US Build Alternative and Build Alternative Design Option would result in adverse effects on freight rail operations, and Malabar Yard railroad improvements were identified as the means of feasible mitigation for that adverse effect. |
| | **AGE 3-76** The Final EIS Appendix Q Section 3.14.3 has been revised to include information from the Los Angeles County Fire Department related to actual and target response time for emergency calls and paramedic response as follows: |

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| | The County of Los Angeles Municipal Service Review and Sphere of Influence Updates for the City of Vernon (2023) reports a CFPD fire response time of 5 minutes~~ The average response time for emergency calls prior to 2020 was 3 minutes~~ (County of Los Angeles ~~Vernon Chamber of Commerce~~ 2023~~0~~). |
| | **AGE 3-77** The environmental evaluation for the Malabar Yard railroad improvements (and collection of existing baseline information to define the affected environment/environmental setting) initiated upon release of the Revised NOI in September 2020. Field observations and feedback from nearby property owners and business stakeholders confirmed that biking is not a widely used mode of transport in the Malabar Yard study area due to heavy truck traffic and narrow street configurations. Metro recognizes that the COVID-19 pandemic temporarily altered traffic patterns, economic activity, and operational dynamics, which could impact data collected during this period. The traffic analysis performed for the Malabar Yard railroad improvements was prepared pursuant to the requirements of *Traffic Impact Analysis Report Guidelines* (County of Los Angeles 1997). The analysis was performed to determine if significant impacts or adverse effects would occur based on the v/c ratio threshold using the Intersection Capacity Utilization (ICU) methodology which does not take into account the pedestrians and bicycles. Therefore, new pedestrians and bicycle counts are not warranted. |

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| | **AGE 3-78** The absence of accidents at the four at-grade crossings along 46th Street is cause for appreciation. This low accident rate is particularly notable given the inherent safety risks of at-grade crossings without gate arms. Therefore, it is both reasonable and judicious to address these risks when the opportunity arises. At-grade crossings are a known safety risk. CPUC's General Order 75-D (Regulations Governing Standards for Warning Devices for At-Grade Highway-Rail Crossings in the State of California) states, "The purpose of these rules is to reduce hazards associated with at-grade crossings by establishing uniform standards for warning devices for at-grade crossings in the State of California, the application of which may afford safety for all persons traversing at-grade crossings." As shown in the Final EIS Appendix Q Section 3.14, Table 3.14-2, none of the four crossings have gate arms, which are included in CPUC's General Order 75-D Standard 9, 9-A, and 9-E. In the absence of the standard warning devices identified in General Order 75-D, Final EIS Appendix Q Section 3.14, Page 3.14-20 correctly indicates that adverse effects may occur under the No Action Alternative.<br><br>**AGE 3-79** Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along |

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| | each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |



VERNONCALIFORNIA

response times due to the configuration of adjacent roadways, and likely push traffic into surrounding EJ communities. — AGE 3-79 Contd.

80. Page 3.24-22
Mitigation measures TR-3, TR-4, TR-5 and TR-6 should be modelled to determine their effectiveness using current traffic counts. — AGE 3-80

81. Page 3.14-23 *"The 46th Street Connector would not increase potential for derailment due to the improvements being constructed per applicable code requirements and the grade and extent of proposed improvements."*

Since the Malabar Yard project would significantly increase rail operations in the area, and since according to the Association of American Railroads, "The vast majority of train derailments happen in rail yards where the average train speed is about five MPH – not on mainline track." There appears to be no factual basis for the statement about not increasing the potential for derailments. — AGE 3-81

82. Page 3.14-26 *"Mitigation Measures"*
As previously stated, mitigation measures to improve traffic flow should be modelled to determine their effectiveness using current traffic counts, and the projected amount of time these long slow-moving trains will be blocking the intersection during all phases of operation. — AGE 3-82

83. Page 3.15-1 *"3.15 Socioeconomics and Communities Affected"*
The following comments are applicable throughout this section. As stated previously, the Malabar Study Area should be expanded to include a radius along the entire length of the Malabar Yard since the operations of the yard will be significantly altered by this project and since there will be construction along the entire length of the Malabar Yard.

Additionally, much of the area within the Malabar Yard Study Area has been rezoned for mixed uses allowing for residential uses and is no longer in the Industrial Zone. — AGE 3-83

84. Page 3.15-20 *"Indirect Effects" – "Any combination of design options for the Malabar Yard railroad improvements would not indirectly generate substantial population or employment growth that would cause new or increased demand for fire protection and law enforcement services. No indirect adverse effect would occur."*

This statement ignores the fact that the City will be divided into east and west by rail operations with several of the major east and west streets being shut down by rail operations for extended periods of time. The City of Vernon is served by one police station, west of the Malabar Yard. To mitigate the impacts on police department response times a second police station east of the Malabar Yard should be constructed. — AGE 3-84

85. Page 3.15-20 "67 percent of the industrial businesses could be assumed to relocate in Los Angeles County (FHWA 2010)." Statistically speaking, this means that approximately one-third (or 15) of the displaced jobs would not relocate in Los Angeles County. Based on the heavy industrial nature of the businesses in Vernon, it is very foreseeable that none of the 46 jobs would relocate in Los Angeles County or even in the State of California due to the regulations imposed on these types — AGE 3-85

Page 18 of 19

**AGE 3-80** Malabar Yard Mitigation Measures TR-2, through TR-5 were modeled to verify that the proposed mitigation measures would fully mitigate the traffic impacts that relate to delay. Malabar Yard Mitigation Measure TR-6 could not be included in the traffic model since there is no metric to determine the level of effectiveness after coordination with CPUC and the City occurs.

**AGE 3-81** As shown in Final EIS Appendix Q Section 2.0, Table 2-1, and clarified in Key Issue Response #2, fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard. In consideration of the train movements shown on Final EIS Appendix Q Section 2.0, Table 2-2, the total daily frequency of trains would be reduced (net reduction of 3.15 trains per day). No change to the intensity of the Malabar Yard is proposed; therefore, there would be no increase in rail operations compared to the existing condition, and no increase in the potential for derailment.

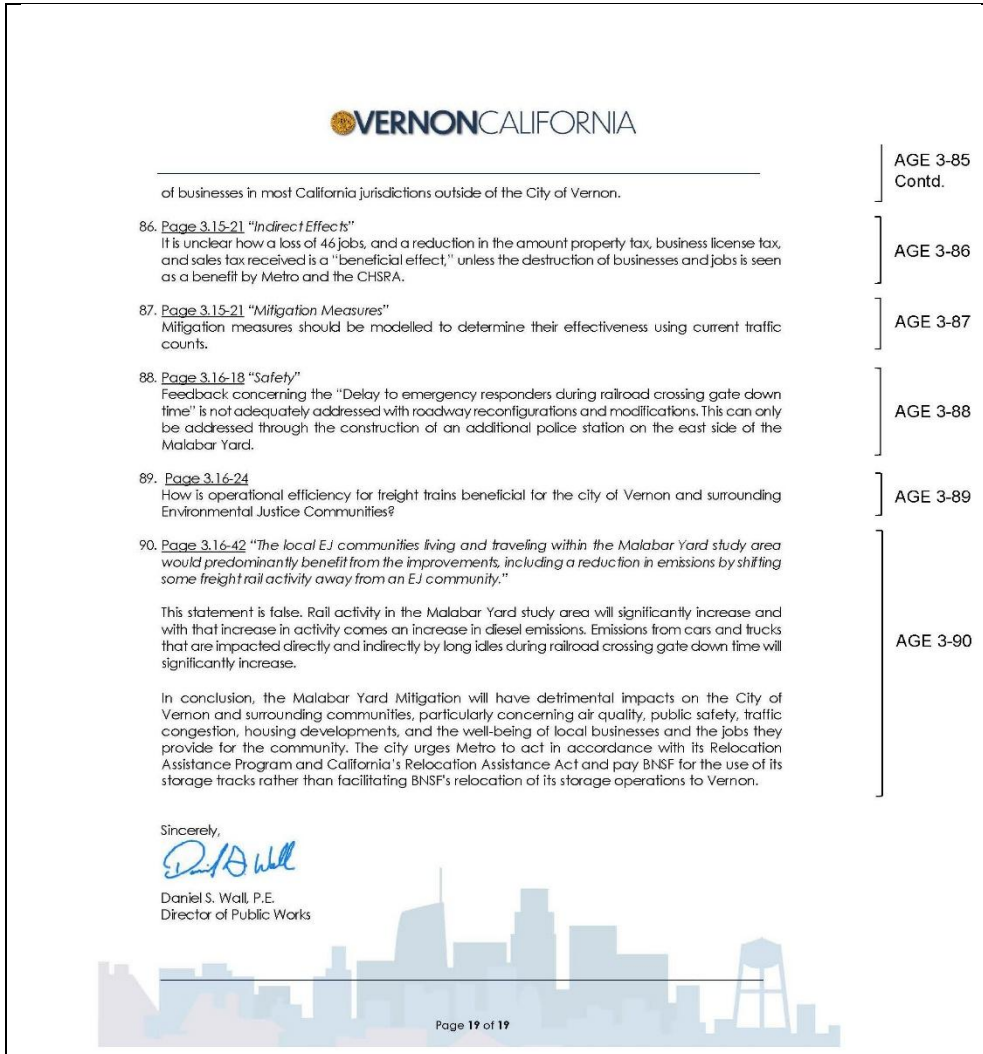
Additionally, and discussed in the Final EIS Appendix Q Section 3.14, the 46th Street Connector improvements would be constructed per applicable code requirements, reducing the risk of derailment.

**AGE 3-82** Malabar Yard Mitigation Measures TR-2, through TR-5 were modeled to verify that the proposed mitigation measures would fully mitigate the traffic impacts that relate to delay. Malabar Yard Mitigation Measure TR-6 could not be included in the traffic

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| | | model since there is no metric to determine the level of effectiveness after coordination with CPUC and the City occurs.<br><br>As discussed in Key Issue Response #2, traffic redistribution would occur from the proposed Malabar Yard railroad improvements and the traffic impact analysis considers this redistribution and the railroad operations (train movements, length of trains). |
| | **AGE 3-83** | Please refer to the Comment AGE 3-49 response regarding the project footprint for the design options considered for the Malabar Yard railroad improvements, and why the analysis is appropriate based on this geographic extent.<br><br>Please refer to Key Issue Response #6 for a discussion of the land use and planning analysis related to existing and future land uses related to the *2023 Vernon Westside Zone Change and General Plan Amendment*, and the consistency analysis performed to demonstrate no conflicts with future mixed-use development would occur. |
| | **AGE 3-84** | Please refer to the Comment AGE 3-11 response regarding city connectivity. As discussed in that response, considering the heavy presence of existing freight trains operating in the City already, reduced train frequencies that would be facilitated by the Malabar Yard railroad improvements (3.15 fewer train movements), improved citywide circulation, and the duration of the day trains would operate between Malabar Yard and Los Angeles Junction (2 percent of the day, |

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| | half of which would operate during the night [7:30pm to 2:00am]), no adverse effect related to division of communities or reduced community connectivity would occur. Fewer train movements on the Harbor Subdivision would increase opportunities for enhanced community connectivity.<br><br>As discussed in Key Issue Response #4, based on the comprehensive quantitative analysis performed in coordination with City staff and the Vernon Police Chief, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers.<br><br>Because an adverse effect would not occur, construction of a second police station located east of Malabar Yard railroad improvements would not be warranted for mitigation. |

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| | **AGE 3-85** The comment is referencing to the business displacements from Design Option 1, which could displace 46 jobs. The comment broadly addresses job relocation but does not provide any technical data/information on prohibiting regulations to substantiate the comment. The evaluation performed to determine potential job loss is based on the potential effects on the three affected parcels where potential building demolition along 46th Street may be required to implement the 46th Street Connector. Given the nature of the businesses, it is not expected that existing regulations would force them to relocate outside of LA County or the State of California; therefore, the Draft EIS/SEIR made reasonable predictions on job losses and business displacements based on the evidence available for each Design Option. Indeed, these considerations led, in part, to developing Design Option 2 and designating Design Option 2 at both locations as the preferred design option. |



VERNONCALIFORNIA

of businesses in most California jurisdictions outside of the City of Vernon. — AGE 3-85 Contd.

86. Page 3.15-21 *"Indirect Effects"*
It is unclear how a loss of 46 jobs, and a reduction in the amount property tax, business license tax, and sales tax received is a "beneficial effect," unless the destruction of businesses and jobs is seen as a benefit by Metro and the CHSRA. — AGE 3-86

87. Page 3.15-21 *"Mitigation Measures"*
Mitigation measures should be modelled to determine their effectiveness using current traffic counts. — AGE 3-87

88. Page 3.16-18 *"Safety"*
Feedback concerning the "Delay to emergency responders during railroad crossing gate down time" is not adequately addressed with roadway reconfigurations and modifications. This can only be addressed through the construction of an additional police station on the east side of the Malabar Yard. — AGE 3-88

89. Page 3.16-24
How is operational efficiency for freight trains beneficial for the city of Vernon and surrounding Environmental Justice Communities? — AGE 3-89

90. Page 3.16-42 *"The local EJ communities living and traveling within the Malabar Yard study area would predominantly benefit from the improvements, including a reduction in emissions by shifting some freight rail activity away from an EJ community."*

This statement is false. Rail activity in the Malabar Yard study area will significantly increase and with that increase in activity comes an increase in diesel emissions. Emissions from cars and trucks that are impacted directly and indirectly by long idles during railroad crossing gate down time will significantly increase.

In conclusion, the Malabar Yard Mitigation will have detrimental impacts on the City of Vernon and surrounding communities, particularly concerning air quality, public safety, traffic congestion, housing developments, and the well-being of local businesses and the jobs they provide for the community. The city urges Metro to act in accordance with its Relocation Assistance Program and California's Relocation Assistance Act and pay BNSF for the use of its storage tracks rather than facilitating BNSF's relocation of its storage operations to Vernon. — AGE 3-90

Sincerely,

Daniel S. Wall, P.E.
Director of Public Works

Page 19 of 19

**AGE 3-86** Please refer to the Comment AGE 3-73 response. The Malabar Yard railroad improvements would generate both positive effects (during the construction phase) and negative effects (during the operations phase) on the economy. As demonstrated in Final EIS Appendix Q Section 3.13, a balanced analysis was performed to determine the conclusions presented in the Draft EIS/SEIR based on the local and regional impacts from short term construction spending, as well as long term impacts considering potential job displacement and lost property tax revenues.

**AGE 3-87** Malabar Yard Mitigation Measures TR-2 through TR-5 were modeled to verify that the proposed mitigation measures would fully mitigate the traffic impacts that relate to delay. Malabar Yard Mitigation Measure TR-6 could not be included in the traffic model since there is no metric to determine the level of effectiveness after coordination with CPUC and the City occurs.

**AGE 3-88** Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in Key Issue Response #4, the total delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction to total delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis in Final EIS Appendix Q Section 3.14 discloses the adverse effects related to emergency

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| | | response and how Malabar Yard Mitigation Measure TR-6 would be implemented to reduce the effects related to the roadway hazard associated with the configuration of the at-grade crossings at the intersection of 46th Street and Seville Avenue. A new police station would not effectively change the intersection roadway configuration in a manner that would reduce the potential adverse effects related to emergency response.<br><br>Based on the results of the evaluation in Final EIS Appendix Q Section 3.15, Page 3.15-19, the Malabar Yard railroad improvements do not increase the demand for law enforcement services that warrant construction of a new police station. |
| | **AGE 3-89** | The City of Vernon's General Plan Policy CI-1.2 identifies the goal of continuing to coordinate with rail companies to provide for efficient rail service that minimizes impacts on the local street system. Please refer to the Comment AGE 3-7 response for a discussion related to the reduced train movements on the Harbor Subdivision and the net reduction of 3.15 trains per day.<br><br>As discussed in Comment AGE 3-4 response, a community analysis of the Malabar Yard railroad improvements is presented in Final EIS Appendix Q Section 3.16. The section analyzes the potential disproportionate and adverse effects on minority, low-income, and non-minority communities within the defined community analysis study area, based on the impacts and beneficial effects identified in Final EIS |

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| | Appendix Q Sections 3.2 through 3.15. Beneficial effects are also disclosed in Final EIS Appendix Q Section 3.16, and are summarized below:<br>• Regional air quality benefits by allowing for the separation of freight and passenger trains operating on the San Bernardino line. With less interference between freight and passenger trains, operational efficiencies would result in less idling and a reduction in train miles and truck VMT.<br>• Reduction in emissions by shifting some freight rail activity away from the minority and/or low-income community west of Malabar Yard and facilitating fewer train movements along the Harbor Subdivision north of Malabar Yard.<br>• New safety enhancements, including arms, flashers, raised medians, and driveway gates at at-grade rail crossings, as well as the closure of one at grade rail crossing.<br>• On 46th Avenue, expanded curbs, sidewalks, traffic signals, center medians, and restriping would improve pedestrian and vehicular mobility and safety.<br>• During construction, up to 143 and 151 temporary jobs are anticipated to be generated, along with $9.4 to $9.7 million in labor income, and $3.3 to $3.5 million in total federal, state, and local tax revenues generated. |

As discussed above, the long-term, regionwide reduction in emissions is a beneficial effect as disclosed in the Final EIS Appendix Q Section 3.5, Section 3.5.4. In addition to the regional air quality benefits, from a localized perspective, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard. The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:

> Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.

**AGE 3-90** Please refer to the previous responses above related to the reduced train movements on the Harbor Subdivision and the net reduction of 3.15 trains per day.

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| | Please also refer to the Comment AGE 3-89 response regarding the beneficial effects within the City of Vernon.<br><br>Contrary to the commenter's statements, the Final EIS demonstrates that the Malabar Yard railroad improvements will benefit the City of Vernon's inhabitants and workforce by decreasing the number of daily train movements in the community. Metro is looking forward to working together to move the Project forward, so the quality of life and enhanced mobility in the City of Vernon and County of Los Angeles can be realized.<br><br>The City of Vernon's feedback is invaluable in helping Metro address community concerns and ensure that the project balances its regional benefits with the needs of the affected communities. |

**Comment Number:** AGE 4

**Name:** Clifton Meek, US EPA

**Date Received:** 08/04/24

**Format Received:** Email

Hi Stefan-

Please see attached EPA comments on the Draft Environmental Impact Statement for the Link Union Station Project. We appreciate the coordination that has taken place with our agency during development of the environmental document, and look forward to continued collaboration with your agency through the remainder of the NEPA process.

Best,

Clifton

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Clifton Meek, Life Scientist

U.S. EPA, Region 9

Environmental Review Section - Transportation Team

[redacted]

Pronouns: He/Him/His

**AGE 4 Clifton Meek, US EPA**

REGION 9
SAN FRANCISCO, CA 94105

August 9, 2024

Stefan Galvez-Abadia
Director of Environmental Services
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, California 95814

Subject: Draft Environmental Impact Statement for the Link Union Station Project, Los Angeles County, California (EIS No. 20240112)

Dear Director Galvez-Abadia:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA. It requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

Los Angeles Union Station (LAUS) serves as one of the primary transportation hubs in Southern California, connecting multiple counties with a combined population exceeding 20 million people. The Link Union Station Project proposes to improve connections between rail, bus service, and future high-speed rail service at LAUS by building new run-through tracks on an elevated rail yard, thus improving operational flexibility, expanding LAUS capacity, and accommodating future high-speed rail service.

We commend California High Speed Rail Authority (CHSRA) and the Los Angeles County Metropolitan Transportation Authority (Metro) for seeking to improve public transportation service, especially in an area of high transit dependence, high traffic congestion, and impacted air quality. EPA is serving as a participating agency for the project EIS and has provided scoping comments (06/30/2016, 10/19/2020), comments on the Revised Coordination Plan (08/02/2023), and comments on the Administrative Draft EIS (02/12/2024). We appreciate the additional information included in the Draft EIS in response to our previous comments.

AGE 4-1

*EPA 309 Review Summary*
The EPA did not identify significant environmental concerns to be addressed in the Final EIS. We provide the following recommendations to improve the environmental outcomes of the proposed action for nearby residents.

Meaningful Public Engagement
As noted in the Draft EIS, construction noise levels will exceed thresholds for nearby residents at William Mead Homes, Care First Village, Mozaic Apartments, and Metro Gateway Childhood Development Center. While the Draft EIS makes it clear that all feasible noise mitigation will be implemented, it is not clear from the document what, if any, direct engagement has occurred since 2019 with nearby residents to assess their concerns and elicit

AGE 4-2

**AGE 4-1** The commenter's acknowledgement of the U.S. EPA's review of the Draft EIS/SEIR and notification that it did not find significant environmental concerns to be addressed in the Final EIS is noted.

**AGE 4-2** Metro takes seriously its obligation to involve minority and/or low-income communities in the decision-making process. To obtain that meaningful input, Metro acknowledges that proactive engagement with minority and/or low-income communities to build a dialogue and information exchange is critical to the process. Metro has implemented a comprehensive stakeholder engagement and outreach process throughout the environmental process, using both formal and informal methods, such as in-person and virtual public meetings, business and community organization briefings, distribution of legal advertisements, email blasts, and social media engagement. Throughout the course of the environmental process from the release of the Notice of Intent in 2016 through release of the Draft EIS/SEIR in June 2024, and after the close of the 45-day public comment period, multiple opportunities to meaningfully engage minority and/or low-income communities were offered by the Project team in-person and virtually. Please refer to Final EIS Chapter 4.0, Community Analysis, Table 4-1, Malabar Yard Technical Memorandum Section 3.16, Community Analysis, Table 3.16-1, and Public Outreach Plan Appendix C, Public Outreach and Community Engagement Activities for a full

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| | list of community engagement activities related to the Project since 2016.<br><br>As detailed in Final EIS Chapter 4.0, Chapter 8.0 (Public and Agency Outreach), and Appendix D (*Community Impact Assessment*), William Mead Homes, Care First Village, Mozaic Apartments, Metro Gateway Childhood Development Center, and community members representing the Little Tokyo District received notification of the Draft EIS/SEIR and were invited to participate and comment on the Project and mitigation measures. No comments requesting additional measures or project elements were received prior to, during, or after the Draft EIS/SEIR public comment period from any residents or representatives from Care First Village, Mozaic Apartments, or Metro Gateway Childhood Development Center (see Final EIS Chapter 4.0, Table 4-2 and Final EIS Appendix D, Table 4-4 (*Community Impact Assessment*). Metro concluded that no comments requesting additional measures or project elements were received prior to, during, or after the Draft EIS/SEIR public comment period from any residents or representatives from Care First Village, Mozaic Apartments, or Metro Gateway Childhood Development Center by reviewing all logs of written and oral comments received during public meetings, emails and telephone records to the Project Team members, and comments from community members made to the Project website.<br><br>During the 45-day public comment period, the City of Vernon requested certain |

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| | measures to offset adverse effects related to the Malabar Yard railroad improvements. Metro has evaluated these measures and, in consideration of the potential for impacts on the City of Vernon community, Metro is proposing to adopt these measures as a part of the Link US Project as offsetting mitigation measures. These measures are described in the Final EIS Appendix Q, Environmental Evaluation of Malabar Yard Mitigation, Appendix G: Community Improvements as Offsetting Mitigation Measures. Some of the requests by the City of Vernon were not proposed to be adopted as part of the Project and are discussed in Appendix A to the *Environmental Evaluation of Malabar Yard Mitigation Appendix G: Community Improvements as Offsetting Mitigation Measures.*<br><br>Input provided by the Little Tokyo community and residents of William Mead Homes was evaluated and determined to have been previously addressed as part of the Build Alternative design features, construction phasing, and mitigation measures.<br><br>Summarized below are specific outreach activities conducted with William Mead Homes and the Housing Authority of the City of Los Angeles (HACLA), the Little Tokyo community, and the City of Vernon. The outreach activities below demonstrate that Metro and CHSRA met and exceeded legal requirements to engage all affected communities to provide meaningful input in the decision-making process to address specific concerns raised for stakeholders. |

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| | • **William Mead Homes and HACLA.** Metro conducted focused outreach efforts with William Mead Homes, which is directly adjacent to and directly impacted by the Build Alternative and Build Alternative Design Option. Comments related to noise were specific to train horns that could potentially affect William Mead Homes residents. As such, the community workshops, Project briefings, and Project update meetings were held to collaborate with and coordinate specific mitigation to minimize and reduce potential effects on the William Mead Homes community. To address these potential noise impacts, Mitigation Measures NV-1, NV-2, AES-1, and Offsetting Mitigation Measure (OMM) AQ-4 were incorporated into the environmental document. Mitigation Measure NV-1 requires Metro to construct a sound wall along the perimeter of the William Mead Home property. Mitigation Measure NV-2 requires Metro and its contractor to employ measures to minimize and reduce construction noise and vibration. Mitigation Measure NV-2 also requires continuous construction noise and vibration monitoring to be conducted at the first row of residences at William Mead Homes, in addition to Care First Village, Mozaic Apartments and the Metro Gateway Childhood |

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| | Development Center. If FTA's construction noise or vibration criteria are exceeded, the construction contractor is required to be alerted and directed by Metro to incorporate additional noise and vibration reduction methods. Mitigation Measure AES-1 requires Metro to implement aesthetic treatments on the sound wall along the perimeter of the William Mead Home property.<br><br>Following the close of the public comment period, HACLA submitted a letter requesting commitments on the timing for implementation, design, and future maintenance of the noise wall at William Mead Homes (required as part of Mitigation Measures NV-1 and AES-1). Additionally, although there would be no adverse air quality effects after implementation of mitigation, HACLA requested air quality monitoring during construction at William Mead Homes, which is included in the Final EIS as an OMM.<br><br>Metro's commitment to public involvement with the William Mead Homes community is demonstrated in the following list of stakeholder engagement activities conducted since 2017:<br><br>o Project briefings on the following dates were held with Council District 1, HACLA, and the William Mead Homes |

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| | Resident Advisory Committee to inform them of upcoming meetings and workshops:<br>• November 15, 2016 – Community Update Meeting<br>• January 12, 2017<br>• October 26, 2017<br>• November 2, 2017 – LAUS Round Table Workshop<br>• February 12, 2018<br>• May 30, 2018<br>• June 21, 2018<br>• December 5, 2018<br>• June 5, 2018<br>• January 9, 2019<br>• January 11, 2019<br>• June 27, 2023<br>• August 14, 2023<br>○ An on-site community workshop was held on April 29, 2017 to provide a Project overview and conduct a listening session to understand resident concerns.<br>○ An on-site community workshop was held on January 26, 2019, to provide a Project update and an opportunity for residents to give input on the Project during the |

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| | Link US Draft EIR 45-day public review and comment period.<br>○ A Project update meeting was held for William Mead Homes community members prior to the Link US Draft EIS/SEIR Public Hearing and 45-day public review and comment period on May 13, 2024.<br>• **Little Tokyo.** As part of the NEPA process, CHSRA, Metro, and FRA conducted outreach activities and public meetings beyond the public review and scoping requirements of NEPA and has implemented extensive outreach throughout the environmental phase within the community of Little Tokyo since 2016. The outreach activities summarized below demonstrate that Metro and CHSRA met and exceeded legal requirements to engage the Little Tokyo community in the decision-making process for the Link US Project.<br>○ Metro held multiple stakeholder meetings with LTBA/Little Tokyo Business Improvement District, Little Tokyo Community Council, and the with additional representatives of Little Tokyo community (Historic Cultural Neighborhood Council and Central Los Angeles Region Town Hall Meetings) between 2016 and 2019 (summarized below). Please note that after |

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| | certification of the Final EIR in 2019, stakeholder engagement and outreach activities conducted in 2020 and 2021 were primarily related to the Malabar Yard railroad improvements component of the Project in the City of Vernon.<br>• *Little Tokyo Business Association/Little Tokyo Business Improvements District*<br>  ○ June 16, 2016<br>  ○ September 21, 2016<br>  ○ November 15, 2016 – Community Update Meeting<br>  ○ May 2, 2018 – LAUS Roundtable Workshop<br>  ○ November 30, 2018 – LAUS Roundtable Workshop<br>  ○ April 17, 2019 – FEIR<br>  ○ June 3, 2019<br>  ○ July 17, 2024 – DEIS/SEIR Project Briefing<br>• *Little Tokyo Community Council – All Committees*<br>  ○ November 2, 2017 – LAUS Roundtable Workshop |

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| | ○ November 30, 2018 – LAUS Roundtable Workshop<br>○ January 17, 2019 – DEIR briefing<br>○ January 22, 2019 – DEIR briefing at LTCC General Meeting<br>○ April 23, 2019 – FEIR<br>• *Historic Cultural Neighborhood Council (included Little Tokyo Representatives)*<br>○ June 15, 2016<br>○ July 12, 2016 – Project briefing at Japanese American Cultural and Community Center<br>○ September 21, 2016<br>○ November 15, 2016 – Community Update Meeting<br>○ November 2, 2017 – LAUS Round Table Workshop<br>○ February 12, 2018<br>• *Central Los Angeles Region Town Hall Meetings*<br>○ September 22, 2021<br>○ November 17, 2021<br>○ January 20, 2022 |

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| | ○ March 17, 2022<br>○ May 19, 2022<br>○ February 28, 2024<br>○ May 29, 2024<br>○ September 25, 2024<br>○ During 2021 and 2022, the environmental process related to elements of the Project in Los Angeles were placed on hold while certain elements of design in the City of Vernon were revised. While the majority of stakeholder engagement and outreach activities were paused in 2021 and 2022, Metro did hold multiple regular town hall meetings throughout this two-year timeframe to provide updates on Central Los Angeles projects, including the Link Union Station. The Town Hall meetings were attended by members of Metro's Community Leadership Council, which includes a representative from Little Tokyo.<br>○ Metro resumed engagement in 2024 to continue working with stakeholders, including the Little Tokyo Business Improvement District to notify stakeholders of the Draft EIS/SEIR Public Hearing on July 9, 2024. |

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| | ○ After the close of the 45-day public comment period, Metro reinitiated engagement with LTBA by holding a meeting on February 20, 2025 for further input and to discuss draft responses to comments received by LTBA. The LTBA hosted the meeting to discuss the LTBA's concerns, comments, and requests related to general stakeholder engagement, the temporary closure of US-101 on/off ramps, the community's cultural/religion institutions, and other Link US Project related items such as pedestrian bridges, facility maintenance, and pickup/drop-off sites on Commercial Street.<br>• **City of Vernon.** In 2020, prior to release of the Revised Notice of Intent (NOI), Metro worked closely with City of Vernon staff to coordinate all public involvement and stakeholder engagement activities as part of the environmental review process for the Malabar Yard railroad improvements. Metro engaged a wide variety of stakeholders including property owners and tenants of potentially affected parcels, the Vernon Chamber of Commerce, the Vernon Business and Industry Commission, City representatives, and property owners within a one-mile buffer of |

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| | the Malabar Yard railroad improvements to share information about the Project and address questions and/or concerns early in the Project development phase.<br><br>As disclosed in Chapter 8.0, Public and Agency Outreach of the Final EIS and as summarized below, Metro implemented a wide range of formal and informal outreach methods with City of Vernon staff, public presentations to the Vernon Business and Industry Commission, distribution of legal advertisements, email blasts, door to door visits to potentially affected properties, phone calls to the businesses using publicly available information, Link US Project pamphlet distribution, and social media engagement.<br><br>A summary of Metro's stakeholder engagement activities performed in the City of Vernon throughout 2020, 2021, 2024, and 2025 is below and is further described in Final EIS, Volume III, Chapter 1.0, Response to Comments under Key Issue Response #1. Stakeholder engagement activities in the City of Vernon were not conducted from April 2021 through April 2024 as Metro was dedicated to drafting environmental documents that were substantive and meaningful for public and stakeholder consideration and feedback. A list of stakeholder outreach meetings |

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| | organized by date can be found in Chapter 8.0, Public and Agency Outreach of the Final EIS.<br><br>○ 2020 and 2021<br><br>▪ In September and October 2020, Metro made in-person visits to engage with representatives of potentially affected properties and to obtain contact information.<br><br>▪ On September 22, 2020, Metro hand-delivered to owners of potentially affected properties notifications of the October 8, 2020, Virtual Public Scoping Meeting.<br><br>▪ On September 22, October 6, and October 8, 2020, Metro distributed flyers and e-blasts to notify individuals, organizations, and agencies on the stakeholder distribution list including property owners and tenants of potentially affected parcels, the Vernon Chamber of Commerce, the Vernon Business and Industry Commission, and City representatives of the Revised NOI and October 8, 2020, Virtual Public |

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| | Scoping Meeting. After the Virtual Public Scoping Meeting, email blasts were also sent on October 12 and 16, 2020, to remind stakeholders of the 30-day public comment period.<br><br>▪ On September 29, 2020, Metro used the County of Los Angeles assessor parcel information to notify all owners of properties traversed by the Project footprint that Metro had released a Revised NOI and that Metro was holding a Virtual Public Scoping Meeting on October 8, 2020. Metro sent letters via Certified Mail to these property owners.<br><br>▪ In 2020, Metro posted six Facebook informational posts regarding the Revised NOI and October 8, 2020, Virtual Public Scoping Meeting.<br><br>▪ Legal advertisements for the Revised NOI and Virtual Public Scoping Meeting were issued in 2020 in four local newspapers (LA Times, LA Opinión (Spanish), Rafu Shimpo (Japanese), and |

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| | Chinese LA Daily News (Chinese)).<br><br>○ 2024<br><br>▪ Outreach conducted prior to the Draft EIS/SEIR public comment period and Open House/Public Hearing:<br><br>• On June 26, 2024, hand-delivered notifications were distributed to owners of all potentially affected properties.<br><br>• Two e-blasts toa total of 896 stakeholders, three posts on the message board website NextDoor, and one Facebook event invite.<br><br>• Approximately 5,000 tri-fold mailers distributed to property owners within 1-mile radius of the Malabar Yard railroad improvements.<br><br>• On May 9, 2024, a virtual Project update presented to City of Vernon Business |

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| | and Industry Commission.<br>• On May 23, 2024, a virtual Project update presented to City of Vernon staff.<br>• Legal advertisements released in four local newspapers (LA Times, LA Opinión (Spanish), Rafu Shimpo (Japanese), and Chinese LA Daily News (Chinese).<br>After the Draft EIS/SEIR public comment period, additional agency consultation and stakeholder engagement activities were conducted to address concerns and comments raised during the 45-day Draft EIS/SEIR public comment period related to the Malabar Yard railroad improvements as summarized below.<br>o Ten meetings with the City of Vernon to address comments raised during the Draft EIS/SEIR public comment period.<br>o Twelve meetings with individual property owners and/or tenants and other community members potentially affected by the Malabar Yard railroad |

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| | improvements to address comments raised during the Draft EIS/SEIR public comment period.<br>○ One Community Meeting/Open House was also conducted on March 26, 2025, in the City of Vernon.<br>○ One Vernon City Council Meeting and One Vernon Chamber of Commerce Meeting<br>During each of the meetings with City staff, an emphasis was placed on the alternatives analysis process for the Malabar Yard railroad improvements, reduced train movements that would result in the City from the consolidated freight railroad operations, how fewer train movements on the Harbor Subdivision (parallel with Santa Fe Avenue) would complement the City's initiatives outlined in the *2023 Vernon Westside Zone Change and General Plan Amendment* and enable improved citywide circulation and quicker emergency response throughout the city, potential impacts on business operations, and community improvements that would further offset potential effects in the City.<br>In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would |

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| | offset adverse effects disclosed in the Final EIS. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. The OMMs in City of Vernon are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis.<br><br>The robust stakeholder engagement activities and wide range of public notifications and outreach methods described above demonstrate that Metro has satisfied and exceeded the CEQA and NEPA requirements for publicizing the Link US Project and the Malabar Yard railroad improvements and providing opportunities for meaningful engagement.<br><br>Metro is committed to continuing the meaningful engagement with the above-mentioned applicable parties during development of the Final EIS, final design and right of way process, prior to construction, and during construction to discuss applicable mitigation measures or |

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| | additional community benefits and opportunities that could be further considered for implementation to reduce adverse effects. |

ideas for additional mitigation measures that might address the unavoidable noise and quality of life impacts posed by project construction. This is particularly important given that William Mead Homes is a public housing community consisting almost entirely of low-income and minority residents, thus eliciting concerns with respect to environmental justice. Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All, states that "advancing environmental justice can successfully occur only through meaningful engagement and collaboration with underserved and overburdened communities to address the adverse conditions they experience and ensure they do not face additional disproportionate burdens or underinvestment." While the Draft EIS concludes that adverse effects of project construction are not projected to be borne disproportionately by residents of William Mead Homes, the EPA recommends that CHSRA and Metro identify and commit to all practicable steps to ensure environmental justice concerns are addressed through meaningful engagement with the affected public. Meaningful public engagement is a process that proactively seeks full representation from the community, considers public comments and feedback, and incorporates that feedback into a project. It improves a community's knowledge of the project, increases trust between the agency and community to build strong relationships, and increases the likelihood that a project will be both accepted and celebrated. While we note the engagement that occurred with nearby residents during the early stages of project planning, more than 5 years have passed since the last outreach event documented in Table 4-1 of the Draft EIS.

AGE 4-2 Contd.

*Recommendations:* Reinitiate meaningful engagement with the above-referenced communities impacted by project construction, and identify whether there are any additional mitigation measures or community benefits that could be implemented beyond the standard mitigation measures identified in the Draft EIS. Examples from similar infrastructure projects include improvements to recreational facilities, upgrades to libraries and reading rooms, and/or provision of other neighborhood facilities that offer refuge from the increased noise experienced during project construction. We recommend that further engagement with these communities be clearly documented in the Final EIS, and that the Final EIS include information on any additional mitigation measures or project elements requested by affected residents, and whether it was decided to implement them or incorporate them into project design.

The EPA appreciates the opportunity to serve as a participating agency during the development of this EIS. We look forward to continuing our work with CHSRA and Metro through the remainder of the NEPA process. If you have questions regarding the comments provided herein, please contact me at donez.francisco@epa.gov, or Clifton Meek, the lead reviewer for this project, at 415-972-3370 or meek.clifton@epa.gov.

AGE 4-3

Sincerely,
FRANCISCO DONEZ
Digitally signed by FRANCISCO DONEZ
Date: 2024.08.09 10:36:00 -07'00'
Francisco Dóñez
Manager
Environmental Review Section 2

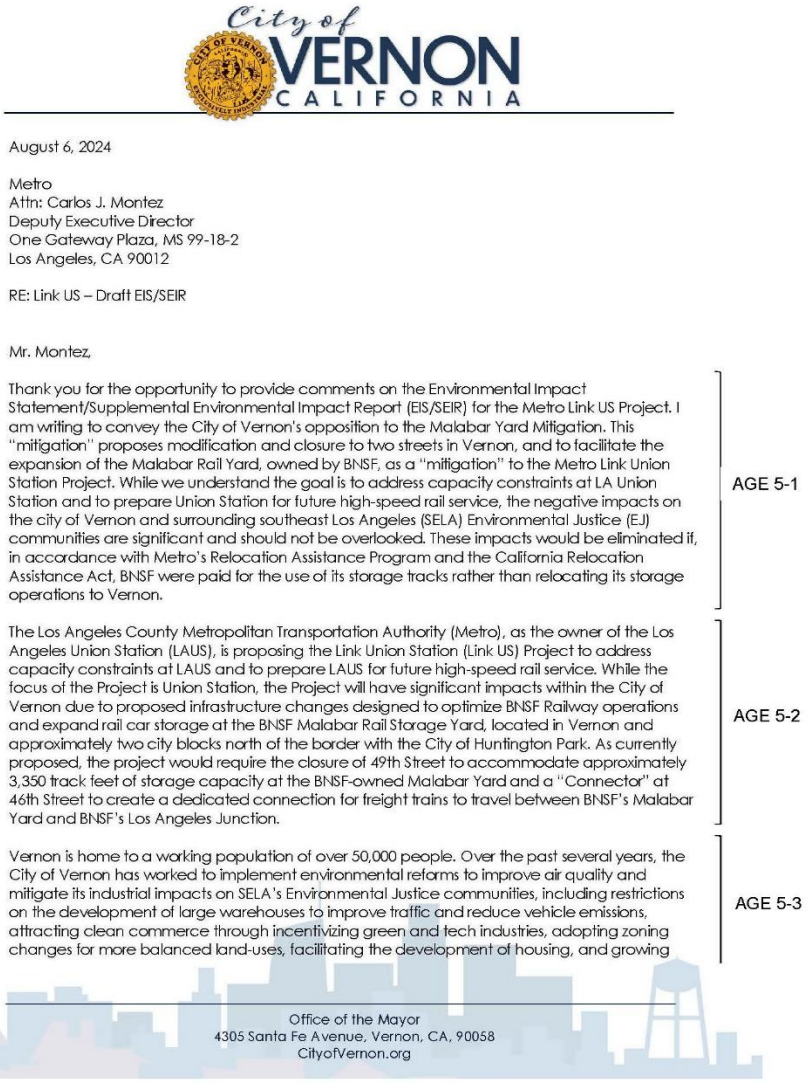
cc: Scott Rothenberg
Deputy Director Environmental Services, California High Speed Rail Authority

Carlos J. Montez
Deputy Executive Officer, Los Angeles County Metropolitan Transportation Authority

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**AGE 4-3** The U.S. EPA's participation in the Project is noted and appreciated.

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| **Comment Number:** AGE 5<br>**Name:** Mayor Judith Merlo, City of Vernon<br>**Date Received:** 08/13/2024<br>**Format Received:** Email | **AGE 5 Mayor Judith Merlo, City of Vernon** |



City of VERNON CALIFORNIA

August 6, 2024

Metro
Attn: Carlos J. Montez
Deputy Executive Director
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

RE: Link US – Draft EIS/SEIR

Mr. Montez,

Thank you for the opportunity to provide comments on the Environmental Impact Statement/Supplemental Environmental Impact Report (EIS/SEIR) for the Metro Link US Project. I am writing to convey the City of Vernon's opposition to the Malabar Yard Mitigation. This "mitigation" proposes modification and closure to two streets in Vernon, and to facilitate the expansion of the Malabar Rail Yard, owned by BNSF, as a "mitigation" to the Metro Link Union Station Project. While we understand the goal is to address capacity constraints at LA Union Station and to prepare Union Station for future high-speed rail service, the negative impacts on the city of Vernon and surrounding southeast Los Angeles (SELA) Environmental Justice (EJ) communities are significant and should not be overlooked. These impacts would be eliminated if, in accordance with Metro's Relocation Assistance Program and the California Relocation Assistance Act, BNSF were paid for the use of its storage tracks rather than relocating its storage operations to Vernon.

AGE 5-1

The Los Angeles County Metropolitan Transportation Authority (Metro), as the owner of the Los Angeles Union Station (LAUS), is proposing the Link Union Station (Link US) Project to address capacity constraints at LAUS and to prepare LAUS for future high-speed rail service. While the focus of the Project is Union Station, the Project will have significant impacts within the City of Vernon due to proposed infrastructure changes designed to optimize BNSF Railway operations and expand rail car storage at the BNSF Malabar Rail Storage Yard, located in Vernon and approximately two city blocks north of the border with the City of Huntington Park. As currently proposed, the project would require the closure of 49th Street to accommodate approximately 3,350 track feet of storage capacity at the BNSF-owned Malabar Yard and a "Connector" at 46th Street to create a dedicated connection for freight trains to travel between BNSF's Malabar Yard and BNSF's Los Angeles Junction.

AGE 5-2

Vernon is home to a working population of over 50,000 people. Over the past several years, the City of Vernon has worked to implement environmental reforms to improve air quality and mitigate its industrial impacts on SELA's Environmental Justice communities, including restrictions on the development of large warehouses to improve traffic and reduce vehicle emissions, attracting clean commerce through incentivizing green and tech industries, adopting zoning changes for more balanced land-uses, facilitating the development of housing, and growing

AGE 5-3

Office of the Mayor
4305 Santa Fe Avenue, Vernon, CA, 90058
CityofVernon.org

**AGE 5-1** Metro appreciates the time City of Vernon staff made available to discuss key concerns and Metro's draft responses based on the comments raised during the Draft EIS/SEIR public comment period. Metro values the City of Vernon's input and take the comments and concerns regarding potential negative impacts on the City of Vernon and surrounding minority and/or low-income communities in southeast Los Angeles seriously.

The Final EIS includes a comprehensive analysis of potential adverse effects and outlines mitigation measures to reduce adverse effects. The responses below address comments related to the community analysis and the reasons why Malabar Yard railroad improvements are proposed as mitigation for Project-related impacts on freight.

Community Analysis - A community analysis of the Malabar Yard railroad improvements is presented in Final EIS Appendix Q Section 3.16. The section analyzes the potential disproportionate and adverse effects on minority, low-income, and non-minority communities within the defined community analysis study area (entire City limits of Vernon), based on the impacts and beneficial effects identified in Final EIS Appendix Q Sections 3.2 through 3.15. Beneficial effects are also disclosed in Final EIS Appendix Q Section 3.16, and are summarized below:

- Regional air quality benefits would occur due to the separation of freight and passenger trains operating on the San

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| | Bernardino line. With less interference between freight and passenger trains, operational efficiencies would result in less idling and a reduction in train miles and truck VMT.<br>• Reduction in emissions by shifting some freight rail activity away from the minority and/or low-income community west of Malabar Yard and facilitating fewer train movements along the Harbor Subdivision north of Malabar Yard (parallel to Santa Fe Avenue).<br>• New safety enhancements, including arms, flashers, raised medians, and driveway gates at existing and new at-grade rail crossings, as well as the closure of one at grade rail crossing.<br>• On 46th Avenue, expanded curbs, sidewalks, traffic signals, center medians, and restriping would improve pedestrian and vehicular mobility and safety.<br>• During construction, up to 143 and 151 temporary jobs are anticipated to be generated, along with $9.4 to $9.7 million in labor income, and $3.3 to $3.5 million in total federal, state, and local tax revenues generated.<br><br>Purpose of Malabar Yard Railroad Improvements - The purpose for implementing the Malabar Yard railroad improvements is to comply with NEPA and CEQA's requirement to mitigate the Project's adverse effects resulting from permanent loss of approximately 5,500 feet of freight storage track capacity (40 CFR 1502.14(f), |

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| | 40 CFR 1502.16(h); CEQA Guidelines §15126.4(a)). A project's impact on freight is an environmental topic required for consideration in an EIS using FRAs Environmental Procedures.<br><br>Mitigation Measure TR-3 would minimize the adverse effect by offsetting the loss of storage tracks at the BNSF West Bank Yard. Impacts to the BNSF West Bank Yard are different than a typical brick and mortar commercial/industrial business because the BNSF West Bank Yard is along the National Good Movement corridor and provides space for critical freight operations that support local, state, and national commerce. Project related effects on freight would result in loss of storage track capacity that would create operational inefficiencies or increased congestion on the shared passenger/freight rail network in the region. The removal of storage tracks at the BNSF West Bank Yard is considered an adverse effect that requires mitigation, whereas impacts to brick and mortar commercial/industrial businesses are addressed via Metro's Relocation Assistance Program and the Uniform Relocation Act.<br><br>The comment regarding compensatory payment to BNSF as an alternative to physical relocation is noted. However, such an approach would not address the operational requirements critical to BNSF's function and the broader freight transportation network that facilitates regional, statewide, and national goods movement. The unique nature of rail operations necessitates a solution that goes beyond financial compensation, as |

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| | | operational continuity for BNSF is vital for efficient freight logistics and goods movement.<br><br>The need for Malabar Yard railroad improvements stems from the operational nature of BNSF's rail infrastructure and are integral to preserving current levels of freight rail operations in accordance with the provisions of the purpose and need of the Link US Project. Paying BNSF monetary compensation to remove storage tracks at the BNSF West Bank Yard, rather than offsetting the adverse effect on freight with mitigation, would not preserve current levels of freight operations. BNSF's operations involve critical rail infrastructure and impacts on freight facilities require physical infrastructure improvements to mitigate Project-related adverse effects.<br><br>Metro remains committed to working collaboratively with the City of Vernon and other stakeholders to ensure that the project achieves its goals while addressing community concerns and minimizing adverse impacts. |
| | **AGE 5-2** | Metro understands the Malabar Yard railroad improvements may have localized impacts within the City of Vernon and adjacent communities. The environmental evaluation in Final EIS Appendix Q was prepared to provide a focused analysis of the two major project components using the appropriate technical methodologies and an industry-standard approach to performing a reasonable and conservative level of impact evaluation to determine potential adverse |

effects. The unavoidable adverse effects related to Transportation, Safety and Security, and Socioeconomics and Communities Affected acknowledged by the commentor as significant impacts aligns with the conservative impact conclusions for these topic areas that were disclosed in the Draft EIS/SEIR.

The responses below address the comments related to freight railroad operations, air quality, the roadway hazard identified at Seville Avenue and 46th Street (cause for unavoidable adverse effects related to Transportation, Safety and Security, and Socioeconomics and Communities Affected), and life safety and emergency response.

- Freight Railroad Operations - Key Issue Response #2 includes clarifications to the information presented in the Final EIS Appendix Q Section 2 regarding freight railroad operations. All of the information and analysis of typical freight railroad operational patterns, and the conclusions in the Final EIS are based on a combination of historical data, stakeholder input, and expert analysis. The information collected from BNSF as it relates to the affected train routes, train lengths, consolidated freight operations, and reduced train frequencies is summarized in Key Issue Response #2. As shown in Table 2 of Key Issue Response #2, 8 daily train movements occur on the affected routes considered (Figure 7), and in the future condition, a total of 4.85 daily train movements would occur on these same affected routes

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| | (Figure 8). As shown in Table 2, the total daily frequency of train movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night. Figures 7 and 8 depict the existing and future daily train movements on the affected routes. Fewer train movements and relocated "train building" improves citywide circulation.<br><br>• Vehicle Idling and Local Air Pollution - Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Final EIS Appendix Q Section 3.5, Section 3.5.4. The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows: |

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| | Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>• Roadway Hazard at Seville Avenue and 46th Street - Key Issue Response #2 notes that a new railroad crossing at the intersection of Seville Avenue and 46th Street could cause southbound vehicular traffic to extend across 46th Street. While blocking an intersection is not a legal vehicular maneuver and queuing is not an LOS related traffic impact that constitutes a significant impact/adverse effect under CEQA/NEPA, the increase in queue at this location may introduce a potential roadway hazard. Malabar Yard Mitigation Measure TR-6 minimizes the potential roadway hazard as effectively as possible because it requires roadway design, railroad safety devices, and accessibility to be coordinated with the City of Vernon and CPUC. Potential roadway safety devices that may be considered for future implementation (Malabar Yard Mitigation Measure TR-6) include queue cutter traffic signals or |

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| | pre-signals for the new railroad crossing on Seville Avenue.<br><br>As discussed in Appendix Q Section 3.14, Page 3.14-23, all Malabar Yard railroad improvements would be designed and constructed to comply with FRA and CPUC standards and specifications to maximize safety for both motorized and non-motorized forms of transportation.<br><br>• Life Safety and Emergency Response - Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the |

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| | | comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |
| | **AGE 5-3** | Metro recognizes the recent planning efforts and City initiatives to improve air quality, mitigate industrial impacts in the City, and facilitate development of additional housing in the city. The Malabar Yard railroad improvements would support the City's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*. As discussed in Key Issue Response #2, the proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from Los Angeles Junction. Daily train movements on the Harbor Subdivision would |

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| | be reduced from 4 existing daily train movements to 0.85 daily train movements (see Key Issue Response #2, Table 2 and Figures 7 and 8). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent fewer train movements on the Harbor Subdivision. In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day).<br><br>The Malabar Yard railroad improvements would facilitate consolidation of freight service in the city from Los Angeles Junction; thereby reducing the total daily train movements on the Harbor Subdivision parallel to Santa Fe Avenue where future mixed-use development is planned. This reduction of train movements would result in a benefit of localized air emissions and noise and vibration reductions to nearby sensitive receptors that are currently present, in addition to future sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Final EIS. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation |

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| | measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis. |



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Vernon's residential population. These efforts have been crucial in safeguarding our residents and workforce. Unfortunately, Metro's proposed modifications on behalf of BNSF threaten to undermine these hard-won gains and put an immediate halt to much-needed housing developments occurring in the project area.

AGE 5-3 Contd.

Since the release of the Draft EIS/SEIR, City staff have carefully reviewed the documents to provide separate technical comments in response to the Link US Environmental Evaluation of Malabar Yard Mitigation (Appendix Q of the Link US Draft EIS/EIR). In summary, the Link US Project would result in adverse impacts to the following areas:

AGE 5-4

**Air Quality and Increased Emissions**
The proposed modifications to BNSF's Malabar Rail Yard to increase storage capacity will lead to an increase in freight railcar traffic within the City of Vernon. This increase in railcars will also cause vehicles to idle longer while waiting for trains to pass. Consequently, this will result in higher emissions of pollutants such as nitrogen oxides (NOx), particulate matter (PM), and other harmful air pollutants. The Malabar Yard "mitigation" seems to justify increased pollution in SELA because the project as a whole reduces emissions regionally.

AGE 5-5

**Public Safety Response Times and Emergency Vehicle Access**
The Malabar Yard Mitigation provides for an increase in BNSF's freight train length to up to 60 Rail Cars – 4,000 feet, almost a mile in length. This will directly impact the response times of emergency vehicles in the City of Vernon. The Vernon Police Department, which prides itself on a swift three-minute response time, is situated on the west side of the rail crossings. If a freight train is passing through, officers must drive south into the City of Huntington Park to circumvent the train, delaying their arrival at critical incidents. Such delays can also impede fire and medical emergency services, and in urgent situations, even a few minutes can mean the difference between life and death. The proposed project does not adequately address how these potential delays will be mitigated to ensure the safety and well-being of the local community.

AGE 5-6

**Traffic Impact with Street Modifications**
The proposed closure of 49th Street and the 46th Street Connector, will cause significant traffic impacts. These two streets are heavily used by surrounding businesses and the closure/modifications will result in issues with traffic patterns, private parking, and access to loading docks, leading to congestion and delays for commuters and local businesses. The closure of 49th Street alone will create additional blockages on: Pacific Avenue (two locations), East bound traffic on 46th Street, Seville Avenue, Soto Street, 44th Street, Boyle Street, Alcoa Avenue, and South Downey Road. These traffic delays are expected to have a cascading effect on the overall transportation network in Vernon, negatively impacting the daily operations and productivity of local businesses and the quality of life for residents, in addition to pushing traffic into surrounding communities.

AGE 5-7

**Operational and Physical Impacts to Businesses**
The proposed expansion and modifications at the Malabar Yard will also have detrimental operational and physical impacts on at least 21 businesses in the vicinity. Metro proposes several design options that include the full demolition of several business buildings. The potential use of business properties for the expansion of BNSF operations could result in the displacement of established businesses, loss of jobs, and economic instability in the area. Additionally, operational

AGE 5-8

Page 2 of 3

**AGE 5-4** The technical comments that are referenced in the comment were provided separately by the City of Vernon on 8/9/24 and have a naming designation referred to in this EIS/SEIR as "AGE 3". Detailed responses to Comments AGE 3-A through AGE 3-90 are presented above.

As discussed in Key Issue Response #1, after the Draft EIS/SEIR public comment period, based on comments received from the City of Vernon and community members and property owners in the City of Vernon, additional agency consultation and stakeholder engagement activities were conducted with City staff, potentially affected property owners and tenants, and other community members to discuss various aspects of the Malabar Yard railroad improvements and to address concerns and comments raised during the public comment period related to the Malabar Yard railroad improvements.

After the Draft EIS/SEIR public comment period, Metro conducted eleven meetings with the City of Vernon to address comments raised during the Draft EIS/SEIR public comment period, comments raised by the Vernon Chamber of Commerce, and comments raised by affected property owners and tenants, and other community members. During each of the meetings with City staff, an emphasis was placed on the alternatives analysis process for the Malabar Yard railroad improvements, reduced train movements that would result in the City from the consolidated freight railroad operations,

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| | how fewer train movements on the Harbor Subdivision (parallel with Santa Fe Avenue) would complement the City's initiatives outlined in the *2023 Vernon Westside Zone Change and General Plan Amendment* and enable quicker emergency response throughout the city, potential impacts on business operations, and community improvements that would further offset potential effects in the City. During these meetings, Metro presented Project-related information and analysis in PowerPoint format to address the City's key concerns. Following each meeting, a meeting summary, including action items was prepared and submitted to the City of Vernon for review and concurrence.<br><br>In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Final EIS. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned.<br><br>These community improvements are discussed in detail in Section 3.16 and Appendix G of the Final EIS Appendix Q, |

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| | Environmental Evaluation of Malabar Yard Mitigation. Metro also conducted a meeting with Los Angeles County Supervisor Hahn's office on January 7, 2025, to provide an overview of the Link US Project and Malabar Yard railroad improvements, alternative sites considered, and a progress update on Metro's meetings held with affected property owners and tenants and other community members after the close of the Draft EIS/SEIR public comment period. Metro also conducted meetings with individual property owners and/or tenants potentially affected by the Malabar Yard railroad improvements and other community members that provided comments on the Draft EIS/SEIR during the public comment period to address specific concerns, some of which were raised as formal comments during the Draft EIS/SEIR public comment period. Metro conducted these meetings on-site at each individual property, Vernon City Hall, or virtually. Between December 2024 and February 2025, Metro met with 10 of 11 property owners/tenants that would be directly impacted by the Malabar Yard railroad improvements and 3 additional property owners/tenants and/or representatives that are not directly impacted but provided comments on the Draft EIS/SEIR during the Draft EIS/SEIR public comment period. The 13 property owners, tenants, and representatives that Metro met with in-person or virtually from December 2024 to February 2025 are discussed in detail in Key Issue Response #1.<br><br>Key Issue Responses #2 through #5 address the concerns raised by the commenter. |

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| | **AGE 5-5** The responses below address the comments related to freight railroad operations, vehicle idling and local air pollution for residents and workers.<br>• Freight Railroad Operations - Key Issue Response #2 includes clarifications to the information presented in the Final EIS Appendix Q Section 2 regarding freight railroad operations. All of the information and analysis of typical freight railroad operational patterns, and the conclusions in the Final EIS are based on a combination of historical data, stakeholder input, and expert analysis. The information collected from BNSF as it relates to the affected train routes, train lengths, consolidated freight operations, and reduced train frequencies is summarized in Key Issue Response #2. As shown in Table 2 of Key Issue Response #2, 8 daily train movements occur on the affected routes considered (Figure 7), and in the future condition, a total of 4.85 daily train movements would occur on these same affected routes (Figure 8). As shown in Table 2, the total daily frequency of train movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night. Figures 7 and 8 depict the existing and future daily train movements on the affected routes.<br>• Vehicle Idling and Local Air Pollution - Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the |

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| | air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling.<br><br>The Final EIS Section 3.5 and Final EIS Appendix G both discuss the potential impacts related to pollution (air quality, climate change, and health risk) associated with the Project (Build Alternative and Malabar Yard railroad improvements combined).<br><br>As indicated in Final SEIR adopted by the Metro Board of Directors on October 23, 2025, Table 7-31 criteria pollutants would not exceed SCAQMD thresholds during construction or operations and air quality impacts associated with the Malabar Yard railroad improvements would be less than significant. Regarding localized emissions, the Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. On-site construction emissions at Malabar Yard were compared to local screening thresholds from SCAQMD and were found to be below the thresholds for all criteria air pollutants (NOx, CO, $PM_{10}$, $PM_{2.5}$) (see Appendix F of Final EIS Appendix Q). Air quality impacts to sensitive receptors further away from the emission source would be less likely to |

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| | be impacted than those identified through the localized analysis. Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.<br><br>Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Final EIS Appendix Q Section 3.5, Section 3.5.4. In addition to the regional air quality benefits, from a localized perspective, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard.<br><br>The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and |

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| | the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>**AGE 5-6** As discussed in the Volume III Introduction, based on information from BNSF, trains on all affected routes are currently and will continue to be 3,000 feet in length. As clarified in Key Issue Response #2, each train is expected to carry up to 45 cars.<br><br>Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the |

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| | | worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |
| | **AGE 5-7** | Metro understands the importance of maintaining efficient traffic flow and minimizing disruptions to businesses, commuters, and residents in the City of Vernon and surrounding communities. The concerns raised about traffic patterns, private parking, access to loading docks, and the cascading effects on nearby streets are taken seriously. The responses below address the comments related to the localized traffic analysis conducted and the intersections and roadway segments |

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| | considered, mitigation measures to reduce Project-related traffic delays.<br><br>• Localized Traffic Analysis Conducted /Intersections and Roadway Segments Considered - The Draft EIS/SEIR includes a thorough and comprehensive evaluation of potential adverse effects from implementation of the Malabar Yard railroad improvements, including traffic and transportation effects associated with railroad operations. The anticipated traffic redistribution and change in traffic along with the list of study intersections and roadway segments patterns was coordinated with the City of Vernon to obtain feedback on the approach before the traffic analysis was performed.<br><br>As discussed in Key Issue Response #2, due to the Project related redistribution of existing traffic, a localized traffic analysis was conducted for intersections and roadway segments within the proximity to the Malabar Yard railroad improvements where traffic redistribution is expected to occur. The traffic study area is shown in Final EIS Appendix Q Section 3.3.3, Figure 3.3-1, and demonstrates that traffic impacts at Pacific Boulevard at two locations, 46th Street, Seville Avenue, and Soto Street were all considered to determine if the Malabar Yard railroad improvements would increase traffic delay to a level that would exceed applicable v/c thresholds.<br><br>As discussed in Key Issue Response #2, the traffic study area does not include intersections or roadway segments between Soto Street and the Los |

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| | Angeles Junction because the Malabar Yard railroad improvements would not generate new traffic trips and would only result in localized redistribution of existing traffic (Final EIS Appendix Q Section 3.3, Page 3.3-8). Trains currently operate across Pacific Boulevard/Vernon Avenue, Pacific Avenue and 46th Street, Seville Avenue, Soto Street, 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road. No operational changes along the East Seville Connection and Hobart Yard/Los Angeles Junction Connection routes would be attributable to the proposed Malabar Yard railroad improvements; therefore, traffic analysis was not conducted at those corresponding intersections.<br><br>For 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road, the four additional train movements that would pass these intersections for BNSF to serve customers on the west side of the City of Vernon (Exxon and West Seville), two movements would occur at night (7:30pm to 2:00am) and two movements would occur during the day (6:30am to 2:00pm). Based on the queuing analysis performed and in response to property owner questions raised in January 2025, Metro conducted a calculation to determine the percentage of time in a 24-hour period that the four additional train movements per day (and the two existing trains movements) may block access to a driveway on 46th Street, which can also be used to demonstrate the overall |

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| | percentage of time trains may block an intersection along the East Seville Connection from Soto Street to the Los Angeles Junction where a detailed traffic evaluation was not conducted (44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road). The calculation assumes 6 train movements per day, with a 3,000-foot train plus 500 feet on either end for gate activation and clearing, traveling at 10 miles per hour, and demonstrates that trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Based on consideration of context and intensity, no adverse effect would occur related to traffic delay at the railroad crossing intersections from Soto Street to Los Angeles Junction where 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road are located.<br><br>While Metro recognizes BNSF would operate trains outside the traffic study area, the existing and future operational scenarios included in the environmental evaluation were focused to the geographic areas where physical modifications to infrastructure improvements or new infrastructure would occur. Indirect impacts were also analyzed per the requirements of 40 C.F.R. 1508.8(b) and CEQA Guidelines Section 15358 since indirect impacts, or secondary impacts, are impacts caused by a project that occur later in time or are |

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| | farther removed in distance but are still reasonably foreseeable.<br><br>As presented in the Final EIS Appendix Q Section 3.3, Page 3.3-48 and in Key Issue Response #2, a queuing analysis was prepared at six locations in response to stakeholder engagement activities to determine whether the existing travel lane storage capacity is adequate to accommodate the queue formations generated from redistributed traffic. The results of the queuing analysis demonstrate for the Opening Year (2024), no increase to the queue formation would be attributable to the Malabar Yard railroad improvements with exception of northbound through movements at Railroad Crossing #4 where there is 20 feet of incremental addition to the existing queuing that already occurs. The increase in queue formation is not considered a substantial change for two main reasons: 1) the additional 20 feet of queue formation translates into less than a vehicle of queue since one vehicle queue is 25 feet; and 2) because the added queue can be adequately accommodated with the current configuration of the roadway and it would take only one cycle of phasing to clear out the additional 20 feet of incremental addition to the existing queuing that already occurs without the need for any further improvements in lane configuration.<br><br>During coordination meetings with the City of Vernon staff after the close of the public comment period, which included, |

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| | queuing Downey Road was a topic of concern. At Railroad Crossing #6 (Downey Road south of Vernon Avenue), the queue formation already exceeds the storage capacity in the existing condition (Table 3.3-10) and would continue to exceed the storage capacity during the 2024 No-Build scenario. The queue formation on Downey Road south of Vernon Avenue in the northbound through and southbound through direction remains the same during AM and PM peak hours.<br><br>With the Malabar Yard railroad improvements, fewer trains would operate in the City and half of the train movements would occur at night, which have very little to no impact on traffic. For trains operating during the day, if a train movement occurs during the AM and PM peak periods, there could be some effect, but trains are not anticipated to operate at the same time every day and are not all occurring during the AM or PM peak periods. The hourly schedule to service Vernon customers fluctuates and is variable throughout the week based on customer demand.<br><br>In March 2025, Metro facilitated a Community Meeting/Open House in the City of Vernon. Multiple comments were raised by the community regarding the duration of time that intersections could be blocked by freight trains. In response to these comments, in April 2025 Metro installed cameras at multiple locations throughout the City to record continuous |

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| | train activity over the course of a week (April 19–25, 2025), 24-hours per day.<br><br>Applying the video footage collected, Metro performed an intersection delay/blockage analysis to document intersection delay/blockage which would occur in the existing condition and with implementation of the Malabar Yard railroad improvements. Metro presented the results of the intersection delay/blockage analysis on June 17, 2025, to the Vernon City Council and on June 23, 2025, to the Vernon Chamber of Commerce. Multiple property owners and business representatives attended both meetings.<br><br>Based on the video data collected, results were summarized for two conditions (Actual Condition [based on observed train activity] and Worst-Case Condition) to determine how the Malabar Yard railroad improvements would change intersection delay/blockage at eight locations and effects to citywide vehicular circulation. Results are summarized below:<br><br>1. Actual Condition (based on observed train activity)<br><br>a. Length of Observed Trains: 350 feet to 1,500 feet<br><br>b. Daily Intersection Blockage Results: With Malabar Yard railroad improvements, daily intersection delay/blockage would be reduced by 30 minutes. |

2. Worst Case Condition

    a. Length of Longest Potential Trains: 3,000 feet

    b. Daily Intersection Blockage Results: If longer trains are needed due to customer demand in the City of Vernon, the corresponding reduction in daily intersection blockage with the Malabar Yard railroad improvements would also increase as compared to the existing condition. Assuming 3,000-foot trains would operate on any given day, daily intersection delay/blockage would be reduced by over 1 hour and 20 minutes. This reduction is based on the assumption that in the existing condition trains would operate with the same length (3,000 feet) without the Malabar Yard railroad improvements.

Based on the train observations conducted in April 2025, the data supports the conclusion that with implementation of the Malabar Yard railroad improvements, a citywide circulation improvement would occur. This is primarily because:

1. 3.15 fewer trains would operate in the City of Vernon, and

2. In the current condition, BNSF's "train building" activities occur on

City streets north of Malabar Yard (Pacific Avenue), which triggers a substantial amount of time when railroad gates are down, delaying/blocking vehicular traffic. With the implementation of the Malabar Yard railroad improvements, most train building activities will be relocated to BNSF's Los Angeles Junction (LAJ) rail yard on the east side of the City.

Mitigation Measures to Reduce Project-Related Traffic Delays - Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, the Malabar Yard railroad improvements would not exacerbate congestion on streets in Vernon, including Vernon Avenue and Downey Avenue or contribute to delays in product shipments. Malabar Yard Mitigation Measures TR-2 through TR-5 were modeled to verify that the proposed mitigation measures would fully mitigate the adverse effect related to traffic delay. Malabar Yard Mitigation Measure TR-6 could not be included in the traffic model since there is no metric to determine the level of effectiveness after coordination with CPUC and the City occurs.

- Operational and Physical Impacts to Businesses - Parking impacts may occur, and when considering both context (total spaces available) and intensity (number of spaces removed), no adverse effect would occur because

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| | the properties would still be usable. In addition, Metro and BNSF will coordinate with the City of Vernon to identify opportunities for long-term parking solutions to offset loss of parking that may occur upon implementation of the Malabar Yard railroad improvements. Given the discretionary authority of the Public Works Director and allowance to provide substitute parking spaces under Section 17.56.50 of the Comprehensive Zoning Ordinance, Metro expects that it can identify parking solutions that would not conflict with the ordinance, and therefore, the loss of parking will not cause an adverse effect.<br><br>The proposed roadway modifications are designed to facilitate essential project components while ensuring safe and legal maneuverability and ingress/egress for adjacent properties. The Malabar Yard railroad improvements are also being designed to maintain access to loading docks while maintaining critical access to and from affected properties.<br><br>Operational and physical impacts to businesses would be minimized by implementing Design Option 2, as the Preferred Alternative, at both locations. The comments provided on the Draft EIS/SEIR with regards to impacts on businesses in the City of Vernon have been taken into consideration and coordination with the City of Vernon and business stakeholders will be ongoing to |

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| | | minimize the extent of impacts during construction and operation. |
| | **AGE 5-8** | Metro is working diligently to address potential operational and physical impacts on local businesses by prioritizing thoughtful design and community collaboration to balance implementation of infrastructure improvements with economic stability and community well-being. One key approach involves minimizing property and parking disruptions through revised design options. For instance, modifications at 46th Street were made throughout the design process to maintain property ingress and egress while reducing the impact on existing buildings. Similarly, adjustments to 49th Street were made to maintain property access, eliminate the need for vehicles to operate on railroad tracks, and minimize on-site parking disruptions. These efforts reflect Metro's commitment to preserving local business operations and reducing adverse effects.<br><br>As discussed in Key Issue Response #5, some job loss resulting from potential building demolition may occur. Final EIS Appendix Q Section 3.13 discloses that Design Option 1 could result in the displacement of existing businesses on three parcels from the full demolition of two buildings and partial a demolition of one building, totaling approximately 48,872 square feet of industrial/manufacturing building space. This may also result in up to 46 jobs displaced. Design Option 2 reduces overall property impacts because it requires less building acquisition and demolition and fewer driveways and parking spaces would |

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| | be affected. Design Option 2 could result in the full acquisition of one parcel and demolition of one building totaling approximately 9,711 square feet of industrial/manufacturing building space, which may also result in up to nine jobs displaced. As part of Metro's Relocation Assistance Program and the Uniform Relocation Act benefits processes, any businesses subject to building demolition or displacement would be compensated or referred to potential and/or suitable replacement sites.<br><br>Parking impacts may occur, and when considering both context (total spaces available) and intensity (number of spaces removed), no adverse effect would occur because the properties would still be usable. Some parking spaces on three additional parcels on the south side of 46th Street may be removed to implement the 46th Street Connector. In addition, Metro and BNSF will coordinate with the City of Vernon to identify opportunities for long-term parking solutions to offset loss of parking that may occur upon implementation of the Malabar Yard railroad improvements. Given the discretionary authority of the Public Works Director and allowance to provide substitute parking spaces under Section 17.56.50 of the Comprehensive Zoning Ordinance, Metro expects that it can identify parking solutions that would not conflict with the ordinance, and therefore, the loss of parking will not cause an adverse effect.<br><br>Based on the comments received during public review, the Final EIS identifies Design |

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| | Option 2 at both locations (49th Street and 46th Street) as part of the Preferred Alternative. |



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disruptions caused by increased freight traffic and construction activities can hinder the day-to-day activities of local businesses, leading to financial losses and forcing several businesses to shut down. AGE 5-8 Contd.

**Appendix Q Analysis**
The analysis in Appendix Q is flawed in several ways, including references to policies for the City of Vernon, British Columbia in the nation of Canada. The analysis also relies on data and traffic studies performed during the COVID pandemic that are not representative of typical traffic conditions, current ordinances, or residential zoning in Vernon, California, USA. AGE 5-9

Another fundamental flaw is that the analysis focuses on the 49th Street closure and the track extension on 46th Street, without examining the impacts that the change in rail operations facilitated by the Malabar Yard Mitigation will have on sensitive receptors in the immediate area. Focusing on 49th and 46th Streets, not the expanded Malabar Rail Yard results in the exclusion of the Vernon City Elementary School, Holy Angels Church of the Deaf, new housing developments in Vernon, and residents on E 53rd Street in Huntington Park from the Study Area. This minimizes the unavoidable adverse impacts of the Malabar Yard Mitigation. These impacts to Vernon and the SELA community would be eliminated if, in accordance with Metro's Relocation Assistance Program and the California Relocation Assistance Act, BNSF were paid for the use of its storage tracks rather than relocating its storage operations to Vernon. AGE 5-10

In conclusion, while the goals of the Metro Link Union Station Project are admirable, we ask that you consider the negative impacts on the City of Vernon and surrounding communities, particularly concerning air quality, public safety, traffic congestion, housing developments, and the well-being of local businesses and the jobs they provide for the community. AGE 5-11

I urge Metro to act in accordance with its Relocation Assistance Program and California's Relocation Assistance Act and pay BNSF for the use of its storage tracks rather than facilitating BNSF's relocation of its storage operations to Vernon. AGE 5-12

Sincerely,

Judith Merlo
Mayor
City of Vernon

Page 3 of 3

**AGE 5-9** The inclusion of references to policies from Vernon, British Columbia, Canada, was a clear oversight. Reference to the "City of Vernon Tree Protection Bylaw #4152 (1996)" for the City of Vernon, British Columbia has been removed from the Final EIS Section ES.0, Final EIS Chapter 7.0 Supplemental Environmental Impact Report, Final EIS Appendix Q, Section ES.0, and Final EIS Appendix Q, Section 3.7. Malabar Yard Mitigation Measure BIO-2 was updated in the locations listed above to refer to the City of Vernon's Tree Ordinance (Code of Ordinances, Chapter 12.24, Street Trees), in California. All other references and citations regarding the City of Vernon were reviewed and verified accurate.

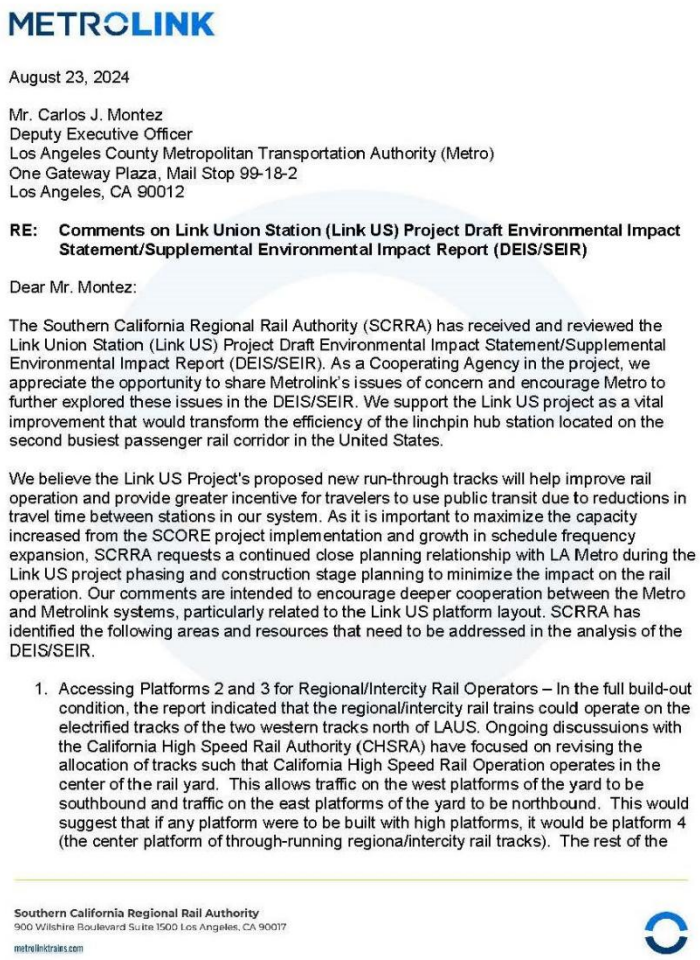
Metro acknowledges that the COVID-19 pandemic temporarily affected traffic patterns, economic activity, and operational dynamics, potentially influencing the data collected during that period. As discussed in Key Issue Response #2, a COVID factor was used to estimated traffic conditions in 2020 without COVID-19. The approach to normalize the traffic count data collected in August 2020 during the COVID 19 pandemic to the traffic levels that existed pre COVID 19 is presented in Final EIS Appendix Q Section 3.3, Transportation, Page 3.3-4 and summarized in Key Issue Response #2. This methodology is an industry standard approach taken during the COVID 19 pandemic and was coordinated with the City of Vernon to obtain feedback on the approach before using the adjusted volumes in the traffic analysis. The traffic volumes

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| | | presented in Final EIS Appendix Q represent the baseline condition at the time the environmental evaluation commenced and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes.<br><br>For further details regarding the traffic impact methodology, anticipated traffic redistribution, localized impact analysis, and potential queuing associated with the implementation of Malabar Yard railroad improvements, please refer to Key Issue Response #2.<br><br>Please refer to Comment AGE 5-3 for a discussion of the land use and planning analysis related to existing and future land uses, including the *2023 Vernon Westside Zone Change and General Plan Amendment*. Additional information can be found in Key Issue Response #6. Table 3 of Key Issue Response #6 includes a consistency analysis with the amended text of the *2023 Vernon Westside Zone Change and General Plan Amendment*. As discussed in that response, no conflicts have been identified with the implementation of the Malabar Yard railroad improvements. |
| | **AGE 5-10** | As discussed above, the proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from Los Angeles Junction. Daily train movements on the Harbor Subdivision would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Key Issue Response #2, Table 2 and |

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| | Figures 7 and 8). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent fewer train movements on the Harbor Subdivision. In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day).The environmental evaluation included in Draft EIS/SEIR addresses the change in rail operations and the associated redistributed traffic and associated beneficial indirect effects related to air quality and noise/vibration from fewer trains operating on the Harbor Subdivision parallel to Santa Fe where future mixed-use residential land uses are proposed.<br><br>The Vernon City School, Holy Angels Church of the Deaf, and residences along Furlong Place and 53rd Street were considered in the environmental evaluation (see Final EIS Appendix Q Section 3.5, Page 3.5-15, Final EIS Appendix Q Section 3.6, Page 3.6-7, Final EIS Appendix Q Section 3.10, and Final EIS Appendix Q Section 3.16.<br><br>As noted in response to Comment AGE 5-1 response, the purpose for implementing Malabar Yard railroad improvements is to mitigate the Project's adverse effects resulting from permanent loss of approximately 5,500 feet of freight storage track capacity (40 CFR 1502.14(f), 40 CFR 1502.16(h); CEQA Guidelines §15126.4(a). |

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| | **AGE 5-11** Metro is committed to working with the City of Vernon to implement the Malabar Yard railroad improvements in a manner that meets the objectives of multiple stakeholders. In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Draft EIS/SEIR. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis. Please refer to responses to technical comments above and responses to AGE 3 comments also provided by the City of Vernon.<br><br>**AGE 5-12** Please refer to the Comment AGE 5-1 response above. |

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| **Comment Number:** AGE 6<br>**Name:** Paul Hubler, Metrolink<br>**Date Received:** 08/13/2024<br>**Format Received:** Email | **AGE 6 Paul Hubler, Metrolink** |



METROLINK

August 23, 2024

Mr. Carlos J. Montez
Deputy Executive Officer
Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza, Mail Stop 99-18-2
Los Angeles, CA 90012

**RE: Comments on Link Union Station (Link US) Project Draft Environmental Impact Statement/Supplemental Environmental Impact Report (DEIS/SEIR)**

Dear Mr. Montez:

The Southern California Regional Rail Authority (SCRRA) has received and reviewed the Link Union Station (Link US) Project Draft Environmental Impact Statement/Supplemental Environmental Impact Report (DEIS/SEIR). As a Cooperating Agency in the project, we appreciate the opportunity to share Metrolink's issues of concern and encourage Metro to further explored these issues in the DEIS/SEIR. We support the Link US project as a vital improvement that would transform the efficiency of the linchpin hub station located on the second busiest passenger rail corridor in the United States.

We believe the Link US Project's proposed new run-through tracks will help improve rail operation and provide greater incentive for travelers to use public transit due to reductions in travel time between stations in our system. As it is important to maximize the capacity increased from the SCORE project implementation and growth in schedule frequency expansion, SCRRA requests a continued close planning relationship with LA Metro during the Link US project phasing and construction stage planning to minimize the impact on the rail operation. Our comments are intended to encourage deeper cooperation between the Metro and Metrolink systems, particularly related to the Link US platform layout. SCRRA has identified the following areas and resources that need to be addressed in the analysis of the DEIS/SEIR.

1. Accessing Platforms 2 and 3 for Regional/Intercity Rail Operators – In the full build-out condition, the report indicated that the regional/intercity rail trains could operate on the electrified tracks of the two western tracks north of LAUS. Ongoing discussuions with the California High Speed Rail Authority (CHSRA) have focused on revising the allocation of tracks such that California High Speed Rail Operation operates in the center of the rail yard. This allows traffic on the west platforms of the yard to be southbound and traffic on the east platforms of the yard to be northbound. This would suggest that if any platform were to be built with high platforms, it would be platform 4 (the center platform of through-running regiona/intercity rail tracks). The rest of the

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AGE 6-1

AGE 6-2

**AGE-6-1** Metro appreciates the Southern California Regional Rail Authority (SCRRA) participation and support for the Project as a cooperating agency. In response to SCRRA's request for a continued close planning relationship during Link US project phasing and construction stage planning, Metro intends to continue that close relationship with the SCRRA during those phases and into the future.

The analysis in the Draft EIS/SEIR addressed the Build Alternative. After the close of the 45-day public comment period, Metro proposed design modifications to the Build Alternative (Build Alternative Design Option) including design variations, refinements, and reductions that are addressed in the Final EIS.

These design modifications that are part of the Build Alternative Design Option are based on information from the engineering design process that provide opportunities to reduce the size of proposed infrastructure, avoid and reduce the magnitude and intensity of environmental effects as compared to the Build Alternative, and reduce cost in a manner that would still allow Metro to meet all provisions of the purpose and need.

**AGE-6-2** In the Draft EIS/SEIR, Platforms 2 and 3 would accommodate level boarding requirements for HSR trains (Build Alternative). The Build Alternative Design Option includes a platform reallocation from the design presented in the Draft EIS/SEIR.

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| | Platforms 3 and 4 for the Build Alternative Design Option would be constructed to accommodate level boarding requirements for HSR trains (see Final EIS Chapter 9). The track allocation described in the comment suggests only Platform 4 would be constructed to accommodate level boarding requirements. Draft EIS/SEIR Section 2.0, Page 2-62 indicates "The platform allocation in the rail yard could be adjusted based on negotiations and operating agreements with Metro and the rail operators at LAUS." Therefore, the potential for platform reallocation and/or reconfiguration was anticipated in the Draft EIS/SEIR.<br><br>In the event the allocation and height of platforms described in the Final EIS is modified or reconfigured, no additional adverse effects or significant impacts to resources considered in the EIS/SEIR would occur as these modifications would occur within the limits of the Project Footprint for the Build Alternative Design Option. The Build Alternative Design Option addresses removal and reconstruction of four platforms at LAUS. Any adjustments during final design would not result in any new, significant impacts or adverse effects. |

platforms [(two to the west (Platforms 2 and 3) and two to the east (Platforms 5 and 6)] have a low platform configuration to accommodate Metrolink regional and Amtrak intercity trains. If a second platform is to be later deemed necessary to have high platforms, one of the adjacent center platforms (Platform 3 or Platform 5) should be designed now to be able to be retrofitted to have high platforms (or low track) to accommodate HSR. — AGE 6-2 Contd.

2. Metrolink Operation Statistics – The report uses Metrolink's Pre-Pandemic service profiles (Table 1.1 and page 3.5-25). With the Metrolink's October 2024 schedule expansion, there will be more trains connecting through LAUS. Please update the information accordingly. — AGE 6-3

3. Metrolink Tier 4 Locomotive Update Progress – The report states that "*This analysis assumes that Metrolink will operate a fully Tier 4 locomotive fleet by 2026 in the mitigated scenario…*" (page 3.5-29) Metrolink is working on updating its fleet to fully Tier 4 locomotive fleet, but the timeline depends upon funding availability. The report should remove the date from the report to avoid confusion. — AGE 6-4

4. Impact on Keller Yard – The report states the potential impact on Metrolink's Keller Yard with the proposed Build Alternative (page 3.10-25). The DEIS/SEIR needs clarification on the extent of the impact on Keller Yard during the construction and in the LAUS full built-out condition. — AGE 6-5

5. Station Drainage Improvement – With the recent flooding issues during major storms, Metrolink is concerned with the drainage issue related to the proposed expansion of the passenger passageway below the LAUS rail yard. The station drainage improvement should reevaluate the storm drain design and provide a detailed drainage remediation design. — AGE 6-6

6. Passenger Station Accessibility Plan – During the rail yard's construction stages, part of the station would likely be inaccessible. During construction, a passenger traffic management plan is necessary to remediate the impact on Metrolink operation and platform access for our riders. — AGE 6-7

7. Missing Information on Document
   a. **Appendix_A-NEPA_Noticing_and_Scoping_Summary_Reports** (page 309): Update Henning Eichler and David Huang as the Public Agency contacts or SCRRA representatives.
   b. Add "SCRRA or Metrolink" and "Southern California Regional Rail Authority" in the acronyms page of **Appendix B, D, E, F, G, H, I, J, K, L, N, O, P, Q, R.** — AGE 6-8

8. Special Analysis of Impacts to transit operations during the 2028 Olympic and Paralympic games. The environmental review of the Link US project should generate — AGE 6-9

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**AGE-6-3** Metro reviewed the data and information presented in Draft EIS/SEIR Chapter 1.0, Table 1-1. The table included information gathered in 2018 to serve as the baseline for determining any added capacity (increased train movements through LAUS) that could be realized upon implementation of the Link US Project. Metro reviewed October 2024 schedule expansion data that anticipates more trains connecting through LAUS. The train frequencies outlined in the October 2024 schedule is in line with the expected growth and increased train movements presented in the Final EIS (existing and future years) – representing an upward trend. Metro concluded that the 2018 data is still valid to serve as the baseline information for the existing and future conditions.

**AGE-6-4** Metrolink's Climate Action Plan sets the goal of 100 percent zero emissions by 2028. Given that Metrolink is already operating 40 Tier 4 locomotives and that the SCAQMD has recently approved funding for an additional 12 Tier 4 locomotives as well as a pilot for 2 electric rail vehicles, it is reasonable to assume that SCRRA will continue to reduce emissions in the future. Metro recognizes that the full Metrolink revenue fleet may not be Tier 4 by 2026. The Draft EIS/SEIR already identifies a potential adverse effect under NEPA and significant impact under CEQA to air quality during operations. The mitigated scenario assumes a full Tier 4 Metrolink revenue fleet; however, Mitigation Measure AQ-3 requires an annual air quality plan to be prepared that

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| | | demonstrates on an annual basis the operational impacts to air quality at LAUS are below criteria and applicable significance thresholds. The use of a Tier 4 Metrolink revenue fleet is one potential pathway to achieve this. Because there are multiple rail operators at LAUS, even if Metrolink does not achieve a full Tier 4 fleet by 2026, Mitigation Measure AQ-3 will still be effective as it sets a performance standard for all rail operators coming into Union Station.<br><br>As Mitigation Measure AQ-3 is dynamic, the 2026 date was removed from the narrative in Final EIS Section 3.5, Page 3.5-31 and in Final EIS Appendix G, Air Quality and Global Climate Change Assessment, Page 59. No change to the air quality calculations or conclusions in the Draft EIS/SEIR is required because all operational emissions associated with the Build Alternative and the Build Alternative Design Option will be held to the performance standard and will be verified annually to meet the requirements of Mitigation Measure AQ-3. |
| | **AGE-6-5** | The tracks referenced in the area of Keller Yard on Draft EIS/SEIR Section 3.10, Page 3.10-25 are SCRRA West Bank tracks MT-3, MT-4, and the Amtrak Roundhouse Lead. The Build Alternative and the Build Alternative Design Option does not include modifications to the Keller Yard storage tracks. The Final EIS Section 3.10.4 has been revised as follows:<br><br>Metrolink currently uses the Keller Yard for storage, <u>specifically SCRRA West Bank tracks MT-3, MT-4, and the Amtrak</u> |

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| | | Roundhouse Lead. The Build Alternative does not include modifications to the Keller Yard storage tracks. However, ~~and the Build Alternative will impact the tracks in this area.~~ excavation, track work, and related grading under the US-101 and El Monte Busway overcrossing are likely.<br><br>Text in Final EIS Chapter 9 is clear the Build Alternative Design Option does not result in modifications to Keller Yard storage tracks. |
| | **AGE-6-6** | The comments regarding the flooding issues at LAUS and proposed drainage condition upon implementation of the expanded passageway are appreciated. When the drainage improvement plans are prepared for the expanded passageway, all applicable codes and regulatory requirements would be considered.<br><br>Metro's Union Station Operation and Management is in the process of selecting a contractor to perform the removal of the slurry blockage in the 30" existing storm drain, located south of the Union Station. This removal work would restore the drainage capacity of the 30" storm drain at Union Station and is expected to start in early 2025. Metro's Operation and Management would continue to monitor flooding and perform necessary improvement in the passageway. |
| | **AGE-6-7** | Final EIS Section 3.3, Page 3.3-56 acknowledges temporary disruptions to commuter daily travel patterns may occur for passengers accessing the heavy rail, light- |

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| | | rail, and regional/intercity rail platforms during construction at LAUS. This page also acknowledges appropriate safety provisions would be required to be in place to minimize disruptions to pedestrian ingress and egress through LAUS. This includes sequencing construction within the rail yard (and passenger concourse) and maintaining safe and accessible access to platforms for the Gold Line and regional/intercity trains. This impact is considered adverse, and Mitigation Measure TR-2 is proposed to mitigate the effects of the Build Alternative. Mitigation Measure TR-2 would also be applicable to the Build Alternative Design Option.<br><br>Mitigation Measure TR-2 includes provisions that require Metro and the construction contractor to prepare detailed temporary construction staging plans for each phase of construction that the contractor implements to maintain mutually agreed upon on time performance goals while minimizing impacts on pedestrians and passengers at LAUS. Prior to construction, Metro and the construction contractor are required to coordinate with current rail operators to ensure that any rail-to-bus or rail-to-rail connections are uninterrupted throughout construction. Detailed temporary construction staging plans are required to be deemed acceptable by the current rail operators prior to commencement of construction activities that could reduce on time performance. |
| | **AGE-6-8** | The SCRRA representatives on Page 309 are part of the list of individuals that attended the virtual scoping meeting on 10/8/2020 |

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| | | (Appendix A, Scoping Noticing and Scoping Summary Reports, Appendix G, Attendee Registration Material).<br><br>The requested edits to the acronym pages of the technical studies are reflected in the Final EIS technical appendices (Volume II). |
| | **AGE-6-9** | The Draft EIS/SEIR includes a thorough analysis of impacts for construction and operation of the Link US Project. If construction of the Project is planned to occur during the Olympic Games 2028, Metro is committed to coordinating with SCRRA in advance of the Olympic Games 2028 to mitigate any potential effects on the operating capacity and reliability of LAUS as a regional/intercity rail station. The Contractor's means and methods during the Olympic Games 2028 are not known at this time and would be required to prepare an operating plan that could be implemented during the Olympic Games. Mitigation Measure TR-2 includes provisions that require preparation of detailed temporary construction staging plans for each phase of construction" and monitoring of on-time performance during construction. If Link US Project construction happens during the Olympic Games or during any other special events that may occur, Mitigation Measure TR-2 will require the contractor to consider those events as it develops staging plans for each phase of construction. |

a through analysis of impacts during the construction period on operating capacity and reliability leading up to and during the Olympic and Paralympic Games in 2028. This will be a critical period during which all parties should ensure there are no negative impacts in the operational capacity or, at the very least, that those construction period impacts are mitigated. A Games period operating plan should be a required deliverable of the Link US environmental review.

AGE 6-9 Contd.

Thank you again for this opportunity to comment on the DEIS/SEIR. We look forward to our continued participation in this important transportation project providing many regional benefits. Should you have any questions, please contact Roderick Diaz at (213) 452-0455 or (213)435-4193 or via e-mail at DiazR@scrra.net.

AGE 6-10

Sincerely,



**Paul Hubler**
Chief Strategy Officer

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**AGE-6-10** Please refer to the Comment AGE-6-1 response. Metro appreciates SCRRAs participation and support for the Project as a cooperating agency.

**Comment Number:** AGE 7

**Name:** Housing Authority of the City of Los Angeles (HACLA)

**Date Received:** 02/21/2025

**Format Received:** Email

HACLA

**Build HOPE:** Investing in People and Place

February 21, 2025

Ms. Stephanie Wiggins,
Chief Executive Officer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-18-2
Los Angeles, California 90012

Mr. Brian P. Kelly,
Chief Executive Officer
California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, California 95814

RE: Link Union Station Project Draft Environmental Impact Statement / Supplemental Environmental Impact Report – HACLA Response

Dear Ms. Wiggins and Mr. Kelly:

The Housing Authority for the City of Los Angeles (HACLA) has reviewed the Link Union Station Draft Environmental Impact Statement / Supplemental Environmental Impact Report ("EIS/SEIR") jointly prepared and issued on June 2024 by the Los Angeles County Metropolitan Transportation Authority (Metro) and the California High-Speed Rail Authority (CHSRA). HACLA believes that some modification is necessary regarding mitigation measures, specifically NV-1. NV-1 is necessary to adequately mitigate the unavoidable adverse impacts the EIS/SEIR found the Project would have on residents of William Mead Homes (WMH)[1].

AGE 7-1

The EIS/SEIR specifically found that the Project would have unavoidable adverse noise impacts on William Mead Homes' residents both during Project construction and once construction is complete. It is therefore crucial that the sound walls required by mitigation measure NV-1 be installed as early as possible during Project implementation. But mitigation measure NV-1 does not appear to prioritize construction of the sound walls to ensure that they will be in place before the bulk of construction—which is of course necessary for the sound walls to provide any benefit during construction. Rather, in terms of timing, mitigation measure NV-1 simply provides that two sound walls will be constructed,

AGE 7-2

[1] Located at 1300 N. Cardinal St., Los Angeles California 90012, WMH is a 415-unit multi-family community/public housing site housing 1,000 of Los Angeles's most vulnerable residents including young children and/or the elderly.

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## AGE 7 Housing Authority of the City of Los Angeles

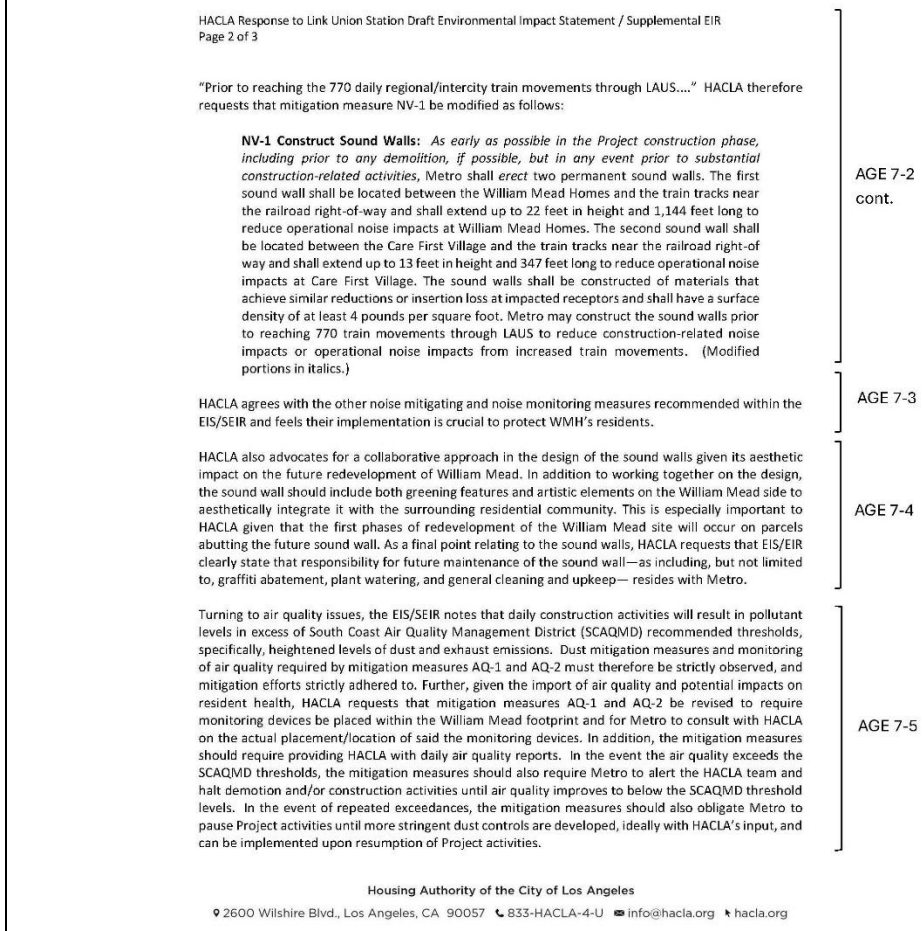
**AGE 7-1** Metro appreciates the comments provided by the Housing Authority of the City of Los Angeles (HACLA) on the Draft EIS/SEIR for the Project.

**AGE 7-2** Metro acknowledges the commenter's concern for the residents of the William Mead Homes (WMH) community and is committed to minimizing potential noise impacts on residents prior to the commencement of Project construction activities including demolition.

Mitigation Measure NV-1 has been revised in the Final EIS as follows:

**NV-1 Construct Sound Walls:** ~~Prior to reaching the 770 daily regional/intercity train movements through LAUS,~~ As early as possible in the Project construction phase, including prior to any demolition, and in any event prior to substantial construction-related activities, Metro shall construct two permanent sound walls. The first sound wall shall be located between the William Mead Homes and the train tracks near the railroad ROW and shall extend up to 22 feet in height and 1,144 feet long to reduce operational noise impacts at William Mead Homes. The second sound wall shall be located between the Care First Village and the train tracks

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| | near the railroad ROW and shall extend up to 13 feet in height and 347 feet long to reduce operational noise impacts at Care First Village. The sound walls shall be constructed of materials that achieve similar reductions or insertion loss at impacted receptors and shall have a surface density of at least 4 pounds per square foot. ~~Metro may construct the sound walls prior to reaching 770 train movements through LAUS to reduce construction-related noise impacts or operational noise impacts from increased train movements.~~ |



HACLA Response to Link Union Station Draft Environmental Impact Statement / Supplemental EIR
Page 2 of 3

"Prior to reaching the 770 daily regional/intercity train movements through LAUS...." HACLA therefore requests that mitigation measure NV-1 be modified as follows:

> **NV-1 Construct Sound Walls:** *As early as possible in the Project construction phase, including prior to any demolition, if possible, but in any event prior to substantial construction-related activities*, Metro shall *erect* two permanent sound walls. The first sound wall shall be located between the William Mead Homes and the train tracks near the railroad right-of-way and shall extend up to 22 feet in height and 1,144 feet long to reduce operational noise impacts at William Mead Homes. The second sound wall shall be located between the Care First Village and the train tracks near the railroad right-of way and shall extend up to 13 feet in height and 347 feet long to reduce operational noise impacts at Care First Village. The sound walls shall be constructed of materials that achieve similar reductions or insertion loss at impacted receptors and shall have a surface density of at least 4 pounds per square foot. Metro may construct the sound walls prior to reaching 770 train movements through LAUS to reduce construction-related noise impacts or operational noise impacts from increased train movements. (Modified portions in italics.)

AGE 7-2 cont.

HACLA agrees with the other noise mitigating and noise monitoring measures recommended within the EIS/SEIR and feels their implementation is crucial to protect WMH's residents.

AGE 7-3

HACLA also advocates for a collaborative approach in the design of the sound walls given its aesthetic impact on the future redevelopment of William Mead. In addition to working together on the design, the sound wall should include both greening features and artistic elements on the William Mead side to aesthetically integrate it with the surrounding residential community. This is especially important to HACLA given that the first phases of redevelopment of the William Mead site will occur on parcels abutting the future sound wall. As a final point relating to the sound walls, HACLA requests that EIS/EIR clearly state that responsibility for future maintenance of the sound wall—as including, but not limited to, graffiti abatement, plant watering, and general cleaning and upkeep— resides with Metro.

AGE 7-4

Turning to air quality issues, the EIS/SEIR notes that daily construction activities will result in pollutant levels in excess of South Coast Air Quality Management District (SCAQMD) recommended thresholds, specifically, heightened levels of dust and exhaust emissions. Dust mitigation measures and monitoring of air quality required by mitigation measures AQ-1 and AQ-2 must therefore be strictly observed, and mitigation efforts strictly adhered to. Further, given the import of air quality and potential impacts on resident health, HACLA requests that mitigation measures AQ-1 and AQ-2 be revised to require monitoring devices be placed within the William Mead footprint and for Metro to consult with HACLA on the actual placement/location of said the monitoring devices. In addition, the mitigation measures should require providing HACLA with daily air quality reports. In the event the air quality exceeds the SCAQMD thresholds, the mitigation measures should also require Metro to alert the HACLA team and halt demotion and/or construction activities until air quality improves to below the SCAQMD threshold levels. In the event of repeated exceedances, the mitigation measures should also obligate Metro to pause Project activities until more stringent dust controls are developed, ideally with HACLA's input, and can be implemented upon resumption of Project activities.

AGE 7-5

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**AGE 7-3** The commenter's support for the remaining noise mitigation measures are noted.

**AGE 7-4** Metro appreciates HACLA's participation and coordination regarding the aesthetic enhancements for the retaining wall/sound wall at the WMH property. In response to HACLA's request for future maintenance of the retaining wall/sound wall, Metro will be responsible for the structural maintenance of the sound wall. In most cases, right-of-way agreements require the property owner to perform routine wall maintenance. Additionally, Metro will collaborate with HACLA to determine the aesthetics and materials for the proposed sound wall. As the property owner, HACLA must enter into a maintenance agreement with Metro.

Mitigation Measure AES-1 has been revised in the Final EIS as follows:

> **AES-1 Aesthetic Treatments:** Retaining walls Segments 1 and 2 and the sound walls in Segment 1 of the Project study area shall be designed in consideration of the scale and architectural style of the adjacent William Mead Homes, Care First Village, and Mozaic Apartments. Based on feedback received during Project development from residents of the William Mead Homes property, Metro shall coordinate with HACLA regarding aesthetic enhancements to the retaining wall/sound wall at that location.

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| | Materials, color, murals, landscaping, and/or other aesthetic treatments shall be integrated into the design of the retaining walls/sound walls to minimize the dominance and scale of the retaining walls/sound walls. Before construction is complete, Metro shall be responsible for the structural maintenance of the sound wall. In most cases, right-of-way agreements require the property owner to perform routine wall maintenance. Additionally, Metro shall collaborate with HACLA and Care First Village to determine the aesthetics and materials for the sound wall. As the property owner, HACLA and Care First Village shall enter into a maintenance agreement with Metro.<br><br>**AGE 7-5** In response to HACLA's request for air quality monitoring during construction at William Meads Homes, the following additions have been added to Chapter 4.0, Community Analysis of the Final EIS to accommodate the requests by HACLA for air quality monitoring during construction:<br>• In Table 4-2:<br>○ Request for air quality monitoring during construction at William Mead Homes<br>• On Page 4-78:<br>OMM AQ-4, Construction Air Quality Monitoring at William Mead Homes |

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| | provides an opportunity to limit construction-related air quality effects to public health and provides additional environmental controls to offset potential localized construction-related air quality effects. OMM AQ-4 will complement AQ-1, Fugitive Dust Control, AQ-2, U.S. EPA Tier 4 Final Exhaust Emission Standards and Renewable Diesel Fuel for Off Road Equipment, and AQ-3, Adaptive Air Quality Management Plan.<br><br>Prior to the start of construction, Metro will develop a construction air quality monitoring plan specific to William Mead Homes in coordination with HACLA, South Coast Air Quality Management District (SCAQMD), and the US Environmental Protection Agency (USEPA). This construction air quality monitoring plan will identify locations along the fence line and within the William Mead Homes property for stationary air quality monitoring to be set up during the phases of construction for the adjacent sound wall construction, throat track reconstruction, and elevated rail yard. The construction air quality monitoring plan will identify the monitoring methodology, inspection procedures, threshold levels for alerts, compliance measures in the event of an alert, and reporting requirements. Compliance measures to be implemented by the construction contractor may include, but are not limited to, additional watering or use of dust suppressants, limiting vehicle speed to 5mph on unpaved surfaces, covering open-bodied trucks, and |

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| | installing wheel washing stations or rumble plates. The construction air quality monitoring plan will also provide contact information for a construction representative to be identified for inquiries by residents of the William Mead Homes community and guidance for community notifications.<br><br>Metro will be responsible for operating and maintaining the air quality monitoring equipment during construction. Metro will have a dust control supervisor on-site during construction to ensure the construction air quality monitoring plan is being followed and that the air quality monitoring equipment remains operational during the phases of construction for the adjacent sound wall construction, throat track reconstruction, and elevated rail yard. The dust control supervisor will maintain a daily log of the construction activity by location, verify the air monitoring measurements, and coordinate back to Metro for validation of the data before release to the public.<br><br>OMM AQ-4 consists of monitoring during construction and does not include infrastructure development or construction, therefore, it would not result in physical impacts on the environment.<br><br>OMM AQ-4 is a considered a community improvement that is incorporated in the Final EIS as an Offsetting Mitigation Measures (OMM) because it would complement existing mitigation measures, further limit or |

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| | compensate for potential impacts disclosed in the Draft EIS/SEIR that were raised by HACLA during the 45-day public comment period and provide benefits to the local Willaim Mead Home community. The discussion of how the OMM AQ-4 is considered as part of the Project is discussed in Chapter 4.0 of the Final EIS. |

HACLA Response to Link Union Station Draft Environmental Impact Statement / Supplemental EIR
Page 3 of 3

Metro's development process must be managed and prioritized with the community's needs in mind, especially those of local residents such as those at WMH. It is with them in mind that HACLA urges prioritization of the sound wall and strict compliance with the Project's air quality mitigation measures. AGE 7-6

If you have any questions, please feel free to reach out to Zoe Kranemann, Development Officer, at zoe.kranneman@hacla.org. AGE 7-7

Sincerely,

Jenny Scanlin
Chief Development Officer
Housing Authority of the City of Los Angeles

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AGE 7-1 Metro appreciates the comments provided by the Housing Authority of the City of Los Angeles (HACLA) on the Draft EIS/SEIR for the Project.

**AGE 7-6** Metro appreciates the comments provided by HACLA and for participating in the review of the Draft EIS/SEIR. Metro will continue ongoing coordination with HACLA to ensure that WMH residents' needs are considered in ongoing planning and mitigation efforts.

**AGE 7-7** The contact information is received and acknowledged.

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# Link US Final EIS Volume III

# Responses to Comments – Organizations

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| **Comment Number:** ORG 1<br>**Name:** Michael Schneider, Streets for All<br>**Date Received:** 06/25/24<br>**Format Received:** Email | **ORG 1 Michael Schneider (Streets for All)** |

The LinkUS DEIR proposes a reconfiguration of the N Main St at-grade crossing with an 8 ft wide median up to 100 ft to the east and west of the tracks **(Figure 1)**. However, the proposed changes will conflict with active transportation infrastructure upgrades outlined in the *Mobility Plan 2035* and this conflict is not addressed in the DEIR. N Main St is a designated Tier 1 Protected Bike Lane on the Bicycle Enhanced network and is a designated Pedestrian Enhanced District. It is also a Moderate Transit Enhanced Street on the Transit Enhanced Network **(Figure 2)**.




**Figure 1.** The proposed reconfiguration of the N Main St grade crossing includes the addition of an 8-ft median and no bicycle facilities. Additionally, the sidewalks remain substandard width.

ORG 1-1

The N Main St ROW is approximately 66 feet wide at the bridge with curb-to-curb width of 56 feet **(Figure 3)**. The addition of an 8 foot median with four 10-11 foot vehicle travel lanes would occupy 48-52 feet of ROW. This leaves only 4 to 8 feet of ROW for bicycle facilities. Protected one-way bicycle facilities will require approximately 16 feet, while a two-way cycle track will require approximately 12 feet of ROW. Protected bicycle facilities may barely fit on the bridge without the addition of the median when maintaining two travel lanes. Additionally, the sidewalk widths of ~5 feet are substandard and would possibly require sidewalk widening as part of the pedestrian enhanced district improvements. Finally, removal of a travel lane will likely conflict with the road's designation as a Moderate Transit Enhanced Street. A different solution will likely be needed to comply with these planned upgrades, which are now mandated by Measure HLA. Some potential options may include N Main St bridge widening/reconstruction, grade separation, or more substantial revision of traffic patterns.

ORG 1-2

**ORG 1-1** Metro appreciates the comments provided regarding incorporating Measure Healthy Streets Los Angeles into the Project design. As discussed below, the Build Alternative and Build Alternative Design Option aligns with several policies of the *Mobility Plan 2035* and the City of Los Angeles has the discretion to implement the future quiet zone separate to or in conjunction with upgrades on North Main Street identified in the *Mobility Plan 2035*.

Based on the comments received from Streets for All, the 8-foot-wide median at North Main Street has been removed from the current design. Final EIS Chapter 2.0, Figure 2-27 has been revised to reflect the latest design of the safety improvements at the North Main Street at-grade public crossing for the Build Alternative. Final EIS Chapter 9, Figure 9-17 also depicts the latest design of the safety improvements at the North Main Street at-grade public crossing for the Build Alternative Design Option. The current design is at a preliminary level and proposed in accordance with CPUC regulations to maximize safety by prohibiting vehicular traffic from crossing into opposite lanes of traffic within the vicinity of the at-grade railroad crossing. As discussed in the Final EIS Section 3.14, a safety assessment was completed for the Project that focused on pedestrian/bicycle safety conditions near the existing rail alignment and at the one the at-grade crossing where proposed improvements would occur (North Main Street). The proposed safety improvements would maximize safety for all

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| | roadway users (vehicular, bicycle, and pedestrian) in alignment with several policies of Chapter 1.0, Safety First of the *Mobility Plan 2035*; including Policy 1.5 Railroad Crossings that states "Reduce conflicts and improve safety at railroad crossings through design, planning and operation," as well as Policy 1.1 Roadway User Vulnerability that states "Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user".<br><br>Railroad safety improvements, in conjunction with a future quiet zone, are being jointly coordinated between the City of Los Angeles and Metro. CPUC requires the formal quiet zone application to be submitted by the City of Los Angeles. The City of Los Angeles, as the local roadway authority, decides whether to implement railroad safety improvements; however, the crossing must meet several requirements before a quiet zone can be established.<br><br>These include:<br>• Federal Railroad Administration Train Horn Rule<br>• California Public Utilities Commission General Orders<br>• United States Department of Transportation's Americans with Disabilities Act Standards for Transportation Facilities<br>• California Manual on Uniform Traffic Control Devices (published by Caltrans). |

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| | Upon Project implementation, improvements to the existing North Main Street at-grade crossing would enhance the safety of the crossing for both pedestrians and bicyclists. Metro will coordinate with the City of Los Angeles on *Mobility Plan 2035* design specifications after the Final EIS process has been completed and prior to beginning of construction.<br><br>Additionally, Metro will continue to coordinate with the City of Los Angeles as the design process advances to maximize safety at the North Main Street railroad crossing, while not precluding future active transportation improvements that the City of Los Angeles may elect to implement.<br><br>The City of Los Angeles has the discretion to implement the future quiet zone separate to, or in conjunction with, upgrades on North Main Street identified in the *Mobility Plan 2035*, and the Project would not preclude such actions.<br><br>The Final EIS Chapter 2.0, Section 2.7.1 has been revised as follows:<br><br>On March 5, 2024, Measure HLA, also known as Healthy Streets LA, was passed and requires the City of Los Angeles to install street enhancements outlines in its *Mobility Plan 2035* when making road repairs.<br><br>The Draft EIS/SEIR Section 3.2, Land Use and Planning, acknowledges that the Project would conflict with the City of Los Angeles *Mobility Plan 2035*, Policy 2.12, which |

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| | | includes recommendations to include walkway and bikeway facilities when installing a new bridge or exclusive transit ROW. Consistent with City's Department of Transportation Guidelines, Mitigation Measure LU-1 (described in Final EIS Section 3.2) would improve connectivity among neighborhoods surrounding LAUS and would facilitate cycling and walking in the Project study area. As identified in Mitigation Measure LU-1, Metro, in coordination with the City of Los Angeles, would implement either Class II or IV type bike lanes that consist of only pavement striping and bollards (no additional ROW and no raised median would be required) along Commercial Street from Alameda Street to Center Street, to enhance neighborhood connectivity south of US-101. If additional funding is identified, a dedicated bicycle/ pedestrian bridge over US-101 would be constructed in addition to the new bicycle lanes described above. |
| | **ORG 1-2** | The railroad safety improvements at North Main Street would be designed and coordinated with the City's Department of Transportation and Bureau of Engineering. As noted in the Comment ORG 1-1 response, the Build Alternative and Build Alternative Design Option aligns with several policies of the *Mobility Plan 2035*, and the City of Los Angeles has the discretion to implement the future quiet zone separate to, or in conjunction with, upgrades on North Main Street identified in the *Mobility Plan 2035*. |

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| | Future improvements to the bridge proposed by the City of Los Angeles (e.g., widening, grade separation, or more substantial revision of traffic patterns as outlined in the comment) to implement *Mobility Plan 2035* would not be precluded by the proposed railroad safety improvements.<br><br>As discussed above in Comment ORG 1-1 response, the Final EIS Section 3.2, Land Use and Planning, acknowledges that the Project would conflict with the City of Los Angeles *Mobility Plan 2035*, Policy 2.12, which includes recommendations to include walkway and bikeway facilities when installing a new bridge or exclusive transit ROW. Consistent with City's Department of Transportation Guidelines, Mitigation Measure LU-1 (described in Section 3.2 of the Final EIS) would improve connectivity among neighborhoods surrounding LAUS and would facilitate cycling and walking in the Project study area. |

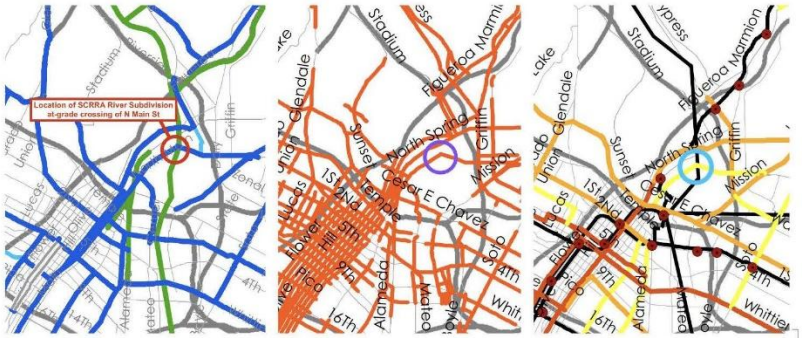



**Figure 2.** N Main St is included in the *Mobility Plan 2035* as a Protected Bicycle Lane Street (left), Pedestrian Enhanced District (center), and a Moderate Transit Enhanced Street (right).

ORG 1-3

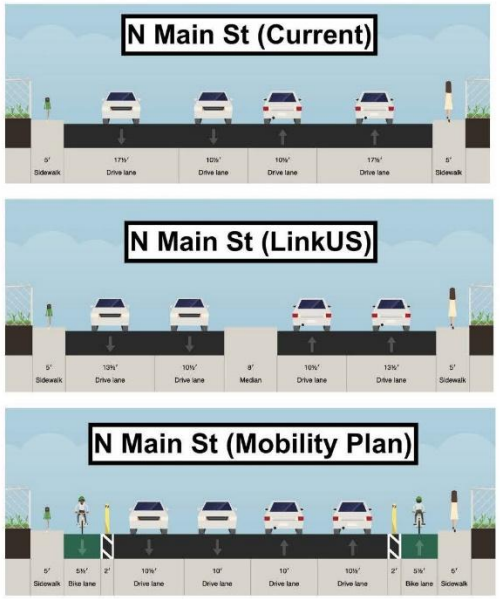



**Figure 3.** The LinkUS proposed median does not permit minimum upgrades to N Main St as outlined in the *Mobility Plan 2035*.

ORG 1-4

**ORG 1-3** Please refer to the Comment ORG 1-1 response regarding the Project's consistency with the *Mobility Plan 2035*. As discussed in that response, while the proposed configuration for the North Main Street at-grade crossing is preliminary, the Final EIS Section 3.2, Land Use and Planning, recognizes that the Project would conflict with the City of Los Angeles *Mobility Plan 2035*, Policy 2.12, related to neighborhood connectivity and active transportation. Improvements to the existing North Main Street at-grade crossing would enhance the safety of the crossing for both pedestrians and bicyclists. Metro will continue to coordinate with the City of Los Angeles on *Mobility Plan 2035* design specifications after the Final EIS process has been completed and prior to beginning of construction.

**ORG 1-4** Please refer to the Comment ORG 1-1 response regarding the proposed safety improvements at North Main Street at-grade crossing and the Project's consistency with the *Mobility Plan 2035*. As discussed in that response, while the proposed configuration for the North Main Street at-grade crossing is preliminary, the Final EIS Section 3.2, Land Use and Planning, recognizes that the Project would conflict with the City of Los Angeles *Mobility Plan 2035*, Policy 2.12, related to neighborhood connectivity and active transportation. Improvements to the existing North Main Street at-grade crossing would enhance the safety of the crossing for both pedestrians and bicyclists. Metro will continue to coordinate with the City of Los Angeles on *Mobility Plan 2035* design

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| | specifications after the Final EIS process has been completed and prior to beginning of construction. |

**Comment Number:** ORG 2

**Name:** Michael Schneider, Streets for All

**Date Received:** 07/23/24

**Format Received:** Email

Hi Stephanie,

Thank you for the response.

Here is what I am hearing from my team:

There seems to be a disconnect between the DEIR, the planned 8' median, and what the mobility plan requires. Would love to resolve this now, while things are still in the planning stages — the two options to implement the mobility plan's protected bike lanes over the bridge seem to be 1) get rid of the planned median so we can fit them or 2) remove one vehicle traffic lane in each direction. SFA is agnostic about how we implement the mobility plan's protected bike lanes, we just want to make sure they are implemented, and it should be taken into account with the planning the project team is doing. The DEIR doesn't even mention the City's mobility plan or the legal requirement that the protected bike lanes are implemented during this project. ORG 2-1

Michael

## ORG 2 Michael Schneider (Streets for All)

**ORG 2-1** Please refer to the Comment ORG 1-1 response for a discussion of the Project's consistency with *Mobility Plan 2035*. Based on the comments received from Streets for All, the 8-foot-wide median at North Main Street has been removed from the current design of the North Main Street safety improvements. Final EIS Chapter 2.0, Figure 2-27 has been revised to reflect the latest design of the safety improvements at the North Main Street at-grade public crossing for the Build Alternative. Final EIS Chapter 9, Figure 9-17 also depicts the latest design of the safety improvements at the North Main Street at-grade public crossing for the Build Alternative Design Option. The proposed safety improvements would maximize safety for all roadway users (vehicular, bicycle, and pedestrian) in alignment with several policies of Chapter 1.0, Safety First of the *Mobility Plan 2035*; including Policy 1.5 Railroad Crossings that states "Reduce conflicts and improve safety at railroad crossings through design, planning and operation," as well as Policy 1.1 Roadway User Vulnerability that states "Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user". The *Mobility Plan 2035* does not set forth limitations on the construction of medians within roadways, nor does it require implementation of protected bike lanes. Rather, it includes recommendations related to neighborhood connectivity and active transportation. The Final EIS Section 3.2, Land Use and Planning, acknowledges that the Project would conflict with the City of Los

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| | Angeles *Mobility Plan 2035*, Policy 2.12, which includes recommendations to include walkway and bikeway facilities when installing a new bridge or exclusive transit ROW.<br><br>Upon Project implementation, improvements to the existing North Main Street at-grade crossing would enhance the safety of the crossing for both pedestrians and bicyclists. Metro will continue to coordinate with the City of Los Angeles on *Mobility Plan 2035* design specifications after the Final EIS process has been completed and prior to beginning of construction.<br><br>The Final EIS Chapter 2.0, Section 2.7.1 has been revised as follows:<br><br>On March 5, 2024, Measure HLA, also known as Healthy Streets LA, was passed and requires the City of Los Angeles to install street enhancements outlines in its *Mobility Plan 2035* when making road repairs. |

**Comment Number:** ORG 3

**Name:** David Schonbrunn, Train Riders Association of California (TRAC)

**Date Received:** 08/01/24

**Format Received:** Email

Attached please find TRAC's Comments on the Link Union Station Draft EIS/SEIR. An email indicating receipt would be much appreciated.

Thank you,

--David Schonbrunn, Vice President

Train Riders Association of California (TRAC)

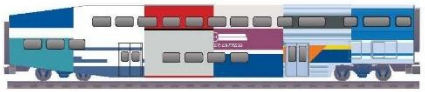
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**ORG 3 David Schonbrunn, Train Riders Association of California (TRAC)**



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William F. McGeehan III
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July 31, 2024

Attn: Carlos J. Montez
Deputy Executive Officer
Los Angeles County Metro
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

Via email to: linkunionstation@metro.net

Re: Comments on Link Union Station - Draft EIS/SEIR

Dear Mr. Montez:

As passenger rail advocates, the Train Riders Association of California, TRAC, has long supported run-through tracks for Los Angeles Union Station, the most important rail terminal in our state. Despite the strong criticisms of the Proposed Project outlined herein, TRAC continues to advocate for the speedy delivery of run-through tracks. ORG 3-1

Our organization has been involved with the Link Union Station project since 2016, when it was invited to participate in a Section 106 historical resources consultation on the project. Our comments on the Draft Environmental Information Statement/Supplemental Environmental Impact Report (DEIS/SEIR) are excerpted from letters sent by TRAC's officers that identify the Proposed Project's fatal flaws from years ago, and offer proposed alternatives. The DEIS' Executive Summary indicates that those very same flaws still remain.

TRAC's comments were principally the product of TRAC's former Vice President, Susan Karat MacAdams. After serving as Metro's High-Speed Rail Planning Manager, she had extensive detailed knowledge of LAUS, including the history of planned additional passageways under the tracks, and safety considerations pertaining to the special trackwork in the throat area. ORG 3-2

Project Definition
Over six years ago, TRAC identified a foundational flaw in the design of the project: the miscalculation of the clearance required over the bus station.

From our 10/9/18 letter to the FRA (attached):

> In Jeanet Owens' [Metro's Link US project manager] March 22, 2017 letter, she wrote: "To construct the proposed run-through tracks, which would span over the new Patsaouras Bus Plaza Station on the El Monte Busway and U.S. 101 freeway, the bridge ORG 3-3

TRAC, active since 1984, is dedicated to a vision of fast, frequent, convenient and clean passenger rail service for California. We promote these European-style transportation options through increased public awareness and legislative action.

**ORG 3-1** The commenter's support for run-through tracks at Los Angeles Union Station is noted.

**ORG 3-2** Metro appreciates the continued involvement from TRAC in the Link Union Station Project and for sharing the feedback in the comments provided. Metro acknowledges the detailed history and expertise that TRAC, including its former Vice President Susan Karat MacAdams, brings and these insights regarding the Project's historical resources and safety considerations have been noted and are valued. Metro remains committed to addressing all concerns and is making all attempts to fully align the Project with the historical and safety standards that have been identified throughout its development.

**ORG 3-3** The commenter's concerns regarding an elevated rail yard are noted. As discussed in the Final EIS Chapter 2.0, Alternatives and Design Options Considered and Final EIS Chapter 9.0, Build Alternative Design Option, an elevated rail yard is a component of the Build Alternative and a partially elevated rail yard is a component of the Build Alternative Design Option. The track alignment and refinements to proposed infrastructure were carefully selected through a screening process, which included design considerations for engineering feasibility, safety, community preferences and public comments received, and optimization of LAUS spaces.

The viaduct over US-101 as part of the Build Alternative Design Option meets Caltrans' vertical clearance requirement of 16.5 feet.

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| | Metrolink's engineering standards (SCRRA Design Criteria Manual, Nov. 2014) require a track slope of no more than 0.2 percent in station platform areas to prevent roll-out. The partial raise of the rail yard by up to 12 feet to ensure a flat (0.0 percent) track slope through the station platform, preventing unintentional movement of rolling stock. Track profiles for the rail yard and LAUS approaches are being developed with Metrolink and other stakeholders, and these will be further defined during final engineering.<br><br>While significant impacts were reported in the 2019 Final EIR for North Main Street Bridge, none of the five other historic roadway bridges south of LAUS will be directly impacted through physical modification, alteration, or removal. Additionally, the proposed run-through tracks will not indirectly affect these bridges, as they pass through the same piers as the existing tracks at the same elevation. |

superstructure for the new run-through tracks is required to meet Caltrans minimum vertical clearance requirements of 16.5 feet. For this reason, the rail yard and platform tracks vertical profile must be adjusted to match the required track profile elevation at the new Patsaouras Bus Plaza Station on the El Monte Busway."

The letter then goes on to say that "The Link Union Station project alternatives include a rail yard raise of 15 feet..." Note, however, that it is contradicted by a letter to us dated January 5, 2018 [attached] from Jeanet Owens. In that letter, Metro made the major admission that "the Patsaouras Plaza Busway Station ... is outside of the footprint of the proposed Link US run-through tracks structure and therefore does not pose additional design constraints to the Link US project."

While clearing the 101 freeway might require raising the tracks a couple of feet, there is admittedly no justification for raising them 15 feet, an extraordinarily expensive undertaking whose actual purpose is unrelated to improving rail operations.

From the beginning of our involvement with this project, TRAC has been concerned that Metro lost sight of the project's original purpose: to provide run-through tracks to vastly increase increase the train-handling capacity of Union Station. Instead, Metro has been fixated on providing retail "opportunities" in the station. In the pursuit of retail, we saw the 15 foot track raise as a potential threat to the safety of rail operations. Perhaps even worse, we saw the possibility that the station design would become so costly as to become unbuildable, thereby delaying the run-through tracks indefinitely.

ORG 3-3 Contd.

The raising of the rail yard is unnecessary--and extremely costly--imperiling the run-through tracks element of the project, which TRAC strongly supports. Based on the scant information that had been made available to us, we believed then and continue to believe that the Throat and Elevated Rail Yard, and the New Passenger Concourse Project Alternatives to be not only infeasible, but to have been premised on a fundamentally incorrect clearance analysis of the busway station.

Safety Impacts
The following DEIS safety impacts were identified in our 1/11/17 letter to project consultant HDR, a global engineering firm:

Building the platform tracks higher than the mainline tracks violates a fundamental principle of railyard design: it creates

ORG 3-4

**ORG 3-4** The partially elevated rail yard is a key component of the Build Alternative Design Option. The screening process considered engineering feasibility, safety, community preferences and public comments, and the optimization of LAUS spaces. Metro acknowledges the concerns about pedestrian safety and accessibility, and the Project includes an expanded passageway with new vertical circulation elements to address these issues.

Regarding historic roadway bridges, the analysis summarized in the Final EIS Section 3.12, Cultural and Paleontological Resources, discloses that the proposed safety modifications would impact character-defining features of the North Main Street Bridge. Prior to implementation of mitigation, effects on this historic property would be adverse. Implementation of Mitigation Measure CUL-2 (described in Final EIS Section 3.12, Cultural and Paleontological Resources) would minimize adverse effects; however, even after implementation of Mitigation Measure CUL-2, effects would remain adverse because cultural resources are non-renewable (Final EIS, Section 3.12, Cultural and Paleontological Resources, Page 3.12-117). None of the five other historic bridges south of LAUS will be physically altered, modified, or removed. Additionally, the proposed run-through tracks will not indirectly affect these bridges, as they pass through the same piers as the existing tracks at the same elevation which already

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| | meet the minimum clearance requirements of CPUC General Order 26-D. |

the risk of runaway trains leaving the station and derailing or colliding with other traffic.

In addition, we are aware that LAUS has some of the most extensive special trackwork on the West Coast. We know that the double split switches must maintain a horizontal profile of no more than 0.3% slope. That would appear to be impossible to achieve with the current proposal.

Another concern of ours is accessibility by elderly and disabled passengers, who constitute a significant share of the users of LAUS. These passengers now use motorized shuttles, which require ramps. It is our understanding that under the proposal, all ramps in the station would be demolished, even though replacement accessibility features for these passengers have not been identified.

ORG 3-4 Contd.

We remain concerned that the historic bridges crossing the Los Angeles River would be severely affected if they had to be elevated to comply with clearance requirements imposed by California Public Utilities Commission General Order 26-D when preserving the vertical relationship between the platform and mainline tracks.

Project Alternative

We offer an alternative to raising the rail yard. The original plans for Union Station made provision for two more passageways under the tracks. If constructed, they could greatly increase the circulation flows in the station, avoiding the massive disruption of Union Station passengers that would occur with implementation of the Proposed Project.

ORG 3-5

Our proposed Project Alternative was stated in our newspaper article: "The original 1933 Union Station design included plans for expanding passenger access to the train platforms: Two new tunnels could be built parallel to and on either side of the now-main corridor. Adding these tunnels would allow for a significant increase in passenger volumes at a very economical cost compared to the $2.2 billion megaproject being considered." *California Rail News* article on Link US, June 2017

Conclusion

This misbegotten project has unjustifiably delayed the implementation of a certified Run-Through Tracks Final EIR, whose Notice Of Intent was published in 2002!

ORG 3-6

Respectfully submitted,

/s/ DAVID SCHONBRUNN

David Schonbrunn, Vice President

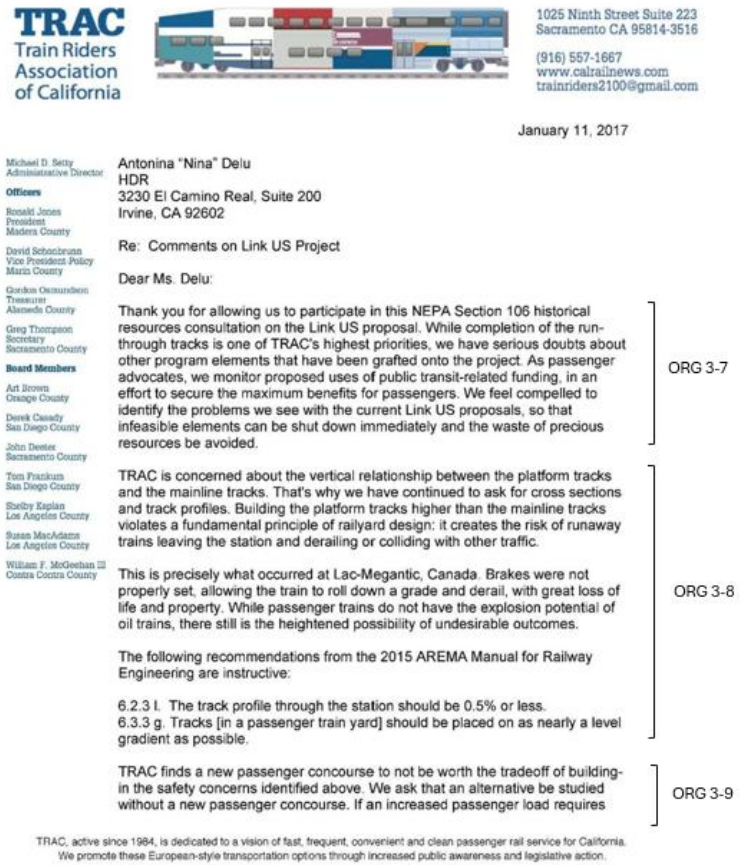
**ORG 3-5** As presented in the Draft EIS/SEIR Chapter 2.0, Alternatives and Design Options Considered, Tables 2-1 and 2-2, 14 track alignment alternatives and 6 concourse concepts were screened to lead to the selection of the Build Alternative. Please refer to Key Issue Response OT-4: Adjacent Parallel Tunnels in the 2019 Final SEIR, Pages 10 and 11, for a discussion on why a concourse concept that included constructing parallel tunnels adjacent to the existing pedestrian passageway was explored but rejected from consideration.

**ORG 3-6** Metro has explained that the purpose and need for the Project is to increase the regional and intercity rail service capacity of LAUS and to improve schedule reliability at LAUS and has also disclosed the drawbacks to the No-Build Alternative (Final EIS Chapter 1.0, Purpose and Need). As presented in the Final EIS Chapter 2.0, Alternative Design Options Considered, Metro has taken sufficient time to analyze alternative approaches and options, and additional alternative consideration would only further support the thoroughness of the alternatives analysis within the Final EIS.

Metro acknowledges TRAC's inclusion of the attachments for Metro's reference. The attachments do not contain comments on information in this Final EIS; however, responses are provided.

TRAC July 31, 2024 4

TRAC Materials Attached
January 11, 2017 letter to HDR
March 25, 2017 letter to Metro
October 9, 2018 letter to FRA
*California Rail News* article on Link US, June 2017
Metro January 5, 2018 letter to TRAC



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January 11, 2017

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Antonina "Nina" Delu
HDR
3230 El Camino Real, Suite 200
Irvine, CA 92602

Re: Comments on Link US Project

Dear Ms. Delu:

Thank you for allowing us to participate in this NEPA Section 106 historical resources consultation on the Link US proposal. While completion of the run-through tracks is one of TRAC's highest priorities, we have serious doubts about other program elements that have been grafted onto the project. As passenger advocates, we monitor proposed uses of public transit-related funding, in an effort to secure the maximum benefits for passengers. We feel compelled to identify the problems we see with the current Link US proposals, so that infeasible elements can be shut down immediately and the waste of precious resources be avoided. — ORG 3-7

TRAC is concerned about the vertical relationship between the platform tracks and the mainline tracks. That's why we have continued to ask for cross sections and track profiles. Building the platform tracks higher than the mainline tracks violates a fundamental principle of railyard design: it creates the risk of runaway trains leaving the station and derailing or colliding with other traffic.

This is precisely what occurred at Lac-Megantic, Canada. Brakes were not properly set, allowing the train to roll down a grade and derail, with great loss of life and property. While passenger trains do not have the explosion potential of oil trains, there still is the heightened possibility of undesirable outcomes.

The following recommendations from the 2015 AREMA Manual for Railway Engineering are instructive:

6.2.3 l. The track profile through the station should be 0.5% or less.
6.3.3 g. Tracks [in a passenger train yard] should be placed on as nearly a level gradient as possible. — ORG 3-8

TRAC finds a new passenger concourse to not be worth the tradeoff of building-in the safety concerns identified above. We ask that an alternative be studied without a new passenger concourse. If an increased passenger load requires — ORG 3-9

TRAC, active since 1984, is dedicated to a vision of fast, frequent, convenient and clean passenger rail service for California. We promote these European-style transportation options through increased public awareness and legislative action.

**ORG 3-7** Metro appreciates the continued involvement from TRAC in the Link Union Station Project and for re-attaching the feedback in the comments provided. Metro provided a response letter dated March 22, 2017, addressing the commenter's concerns outlined in this comment.

**ORG 3-8** To construct the proposed run-through tracks, which would span over the new Patsouras Bus Plaza Station on El Monte Busway and U.S. 101 freeway, the bridge superstructure for the new run-through tracks is required to meet minimum Caltrans vertical clearance requirements of 16.5 feet. For this reason, a portion of the rail yard and the platform tracks' vertical profile must be adjusted to match the required track profile elevation at the new Patsouras Bus Plaza on the El Monte Busway.

**ORG 3-9** Please refer to response to Comment ORG 3-5 for discussion on the suggested parallel tunnels alternative. As presented in the Draft EIS/SEIR Chapter 2.0, Alternatives and Design Options Considered, Table 2-2, 6 concourse concepts were screened to lead to the selection of the concourse design. The selected passenger concourse design needs to meet the screening criteria listed on Page 2-3 of Chapter 2.0 of the Draft EIS/SEIR which include the following:

1. Add Passenger Capacity;
2. Provide Egress Routes and Safe Evacuation;

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| | 3. Enhance Passenger Safety and Accessibility;<br><br>4. Optimize Concourse Space and Back-of-House Operations;<br><br>5. Maintain or Improve Passenger Transfer Times; and<br><br>6. Align with Community Preference.<br><br>Of the 6 passenger concourse design options evaluated in Table 2-2, Concourse Concept 6 (Expanded Passageway) met all 6 of the screening criteria and was recommended for further consideration in the Draft EIS/SEIR. |

more capacity, we suggest constructing two new tunnels parallel to the existing passenger tunnel. We would be pleased to provide a detailed description for an appropriate alternative. ORG 3-9 Contd.

We are also very concerned about the constructability of the proposed new passenger concourse on an operating rail terminus. The need to retain operational tracks would require a carefully phased project that would not only be very disruptive to passengers and to operations, it would be very expensive. ORG 3-10

In addition, we are aware that LAUS has some of the most extensive special trackwork on the West Coast. We know that the double split switches must maintain a horizontal profile of no more than 0.3% slope. That would appear to be impossible to achieve with the current proposal, and again is why we ask for sections to independently verify HDR's assumptions and conclusions. ORG 3-11

Another concern of ours is accessibility by elderly and disabled passengers, who constitute a significant share of the users of LAUS. These passengers now use motorized shuttles, which require ramps. It is our understanding that under the proposal, all ramps in the station would be demolished, even though replacement accessibility features for these passengers have not been identified. ORG 3-12

While these concerns do not fall directly under the purview of a consultation on historic properties, we remain concerned that the historic bridges crossing the Los Angeles River would be severely affected if they had to be elevated to comply with clearance requirements under CPUC General Order 26-D when preserving the vertical relationship between the platform and mainline tracks.

TRAC is aligned with the interests of the LAUS Historical Society. We too are deeply appreciative of the historic architecture of LAUS. We are unable to offer any opinions about the compatibility of the proposed project with the historic resources of the station, because we have not been given any renderings to review. We will be pleased to offer our thoughts when offered materials, because we are concerned that any new construction in the station fit well with the superb restoration that was completed after LA Metro purchased the historic property. ORG 3-13

TRAC appreciates this opportunity to be involved in the protection and enhancement of the most important rail facility in Southern California. ORG 3-14

Sincerely,

/s/ DAVID SCHONBRUNN

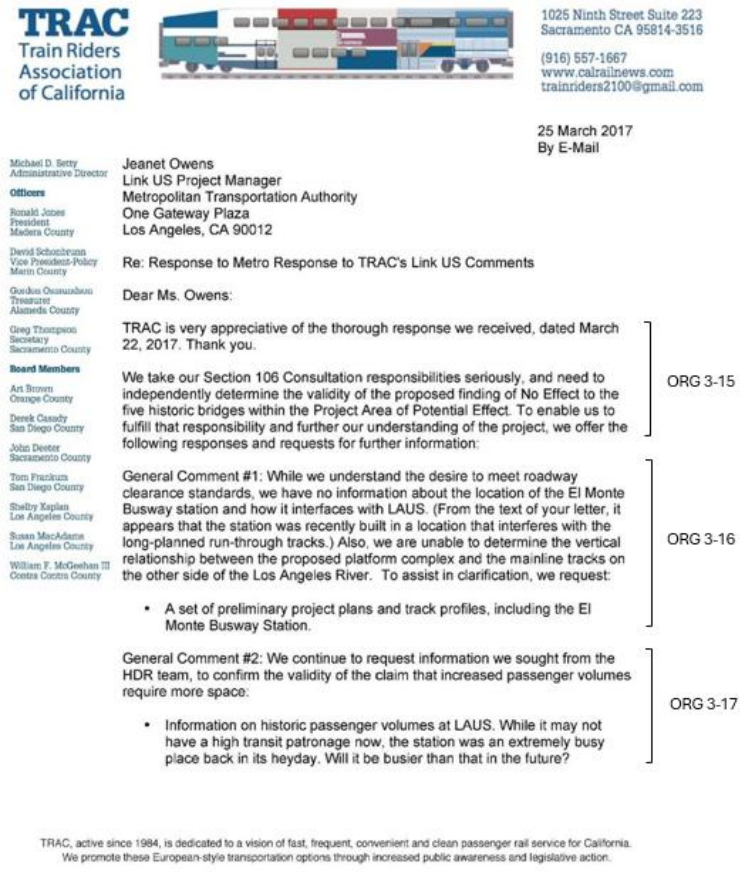
David Schonbrunn,
Vice-President for Policy
David@Schonbrunn.org

**ORG 3-10** Metro has recognized the complexity involved in the construction of the Link US Project on an operating rail terminus while maintaining local and regional transit/rail operations and minimizing disruption to passengers and other station customers. Hence, the Link US Team has developed a detailed construction phasing plan to minimize disruptions to the various local/regional/intercity transit/rail and bus operators and passengers that utilize LAUS.

**ORG 3-11** Please refer to Comment ORG 3-3 response for a discussion on vertical clearance of US-101.

**ORG 3-12** Please refer to Final EIS Section 3.14, Safety and Security (Page 3.14-29) for a detailed description of expanded passageway and concourse-related safety improvements. The Build Alternative would include new VCEs (e.g., stairs, escalators, and elevators) that would be installed to connect with elevated platforms. Elevated platforms would also be widened to enhance safety, while allowing enough space for the new VCEs, providing sufficient room for passenger movements, and to meet current ADA, CBC, and NFPA evacuation requirements. These improvements would increase passenger capacity, enhance safety and ADA accessibility, allow for more efficient passenger egress movements to and from the various transit modes at LAUS, and accommodate the forecast increases in passengers while meeting CBC requirements.

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| | **ORG 3-13** Since retrieval of this letter, TRAC has had extended correspondence with Metro and the Link US Team regarding the historic bridges crossing the Los Angeles River. The environmental document assumes it is feasible to tie back into the mainline at-grade and that there is no vertical change to the tracks beneath the various bridges that cross the Los Angeles River. As such, with no vertical change in the area the Project will have no effect on those bridge resources.<br><br>**ORG 3-14** Metro appreciates the continued involvement from TRAC in the Link Union Station Project. Metro remains committed to addressing all concerns and is making all attempts to fully align the Project with the historical and safety standards that have been identified throughout its development. |



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25 March 2017
By E-Mail

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Los Angeles, CA 90012

Re: Response to Metro Response to TRAC's Link US Comments

Dear Ms. Owens:

TRAC is very appreciative of the thorough response we received, dated March 22, 2017. Thank you.

We take our Section 106 Consultation responsibilities seriously, and need to independently determine the validity of the proposed finding of No Effect to the five historic bridges within the Project Area of Potential Effect. To enable us to fulfill that responsibility and further our understanding of the project, we offer the following responses and requests for further information:

ORG 3-15

General Comment #1: While we understand the desire to meet roadway clearance standards, we have no information about the location of the El Monte Busway station and how it interfaces with LAUS. (From the text of your letter, it appears that the station was recently built in a location that interferes with the long-planned run-through tracks.) Also, we are unable to determine the vertical relationship between the proposed platform complex and the mainline tracks on the other side of the Los Angeles River. To assist in clarification, we request:

- A set of preliminary project plans and track profiles, including the El Monte Busway Station.

ORG 3-16

General Comment #2: We continue to request information we sought from the HDR team, to confirm the validity of the claim that increased passenger volumes require more space:

- Information on historic passenger volumes at LAUS. While it may not have a high transit patronage now, the station was an extremely busy place back in its heyday. Will it be busier than that in the future?

ORG 3-17

TRAC, active since 1984, is dedicated to a vision of fast, frequent, convenient and clean passenger rail service for California. We promote these European-style transportation options through increased public awareness and legislative action.

**ORG 3-15** As noted in Metro's letter response dated March 22, 2017, as part of the Section 106 consultation for the Project, TRAC had opportunity to review and comment on the cultural resources documents when they became available. Since then, Metro appreciates TRAC for participating in Section 106 consultation with FRA and the Link US Team.

**ORG 3-16** Please refer to Appendix B, Engineering Plans, of the Final EIS for preliminary track drawings and conceptual designs of the Build Alternative and Build Alternative Design Option.

**ORG 3-17** Please refer to Final EIS Chapter 1.0, Purpose and Need, Section 1.2 for a detailed description of current operations at LAUS and Section 1.4 for discussion on the forecasted increase in regional population and employment.

General Comment #3: We repeatedly asked the HDR team to provide us with the memo described in your letter as a "preliminary engineering review." We informed the team that we had serious doubts as to its conclusions and needed to review their work. Those doubts were not addressed by your letter's repetition of the study's conclusions. We again request: ORG 3-18

- The preliminary engineering review of the required track elevations along the approaches to Los Angeles Union Station from the mainline tracks along the West Bank of the Los Angeles River, and accompanying profiles.

We seek to assist in retaining the historic architecture of the station, and in ensuring the compatibility of new additions with Metro's exceptional station renovation, since Metro purchased the station. Toward that end, we request: ORG 3-19

- Renderings of proposed additions/modifications to LAUS.

In summary, it is impossible for us to provide a meaningful Section 106 consultation unless we are able to review the requested materials. ORG 3-20

As a rail passenger advocacy organization, we are dedicated to the cost-effective expansion of passenger rail facilities and services. TRAC has a strong interest in seeing the run-through tracks completed as expeditiously as possible, and not impeded by the pursuit of infeasible alternatives. We are attempting to aid Metro in seeing this project through to its conclusion. ORG 3-21

Thank you for your assistance in this matter.

Sincerely yours,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
Vice-President for Policy
David@Schonbrunn.org

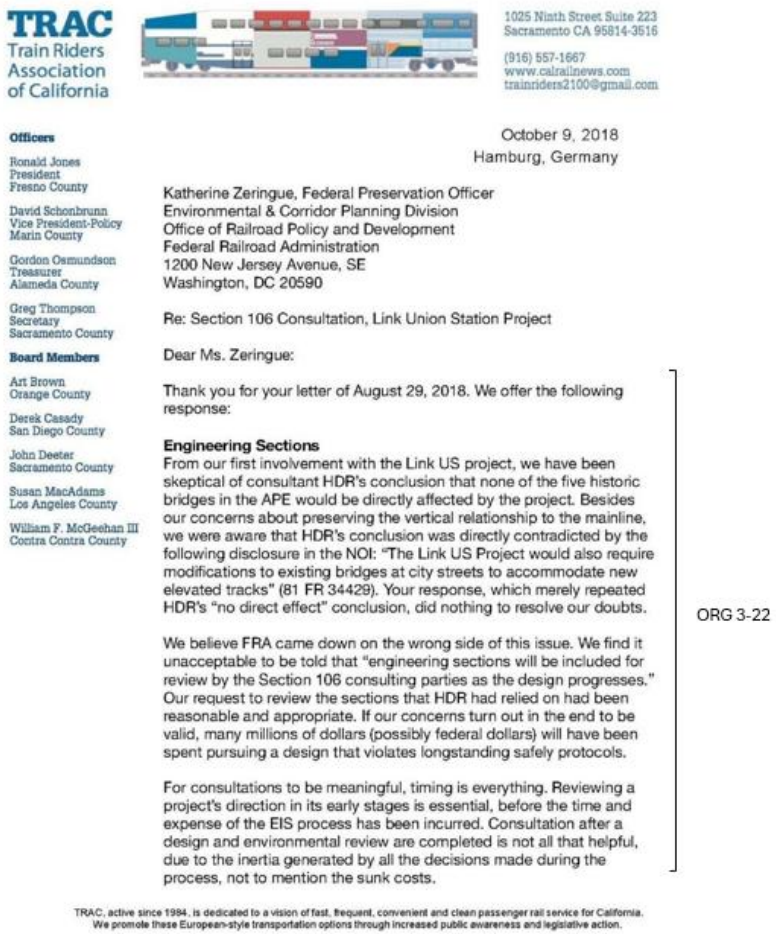
cc: FRA personnel

**ORG 3-18** Please refer to response to Comment ORG 3-16 above.

**ORG 3-19** TRAC has had extended correspondence with Metro as a result of TRAC participating in Section 106 consultation with FRA since 2017. Please refer to the 2019 Link US Project Final EIR, Final SEIR, Response to Comments for discussion on involvement with FRA.

**ORG 3-20** Please refer to response to Comment ORG 3-19 above.

**ORG 3-21** Metro appreciates the continued involvement from TRAC in the Link Union Station Project.



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William F. McGeehan III
Contra Contra County

October 9, 2018
Hamburg, Germany

Katherine Zeringue, Federal Preservation Officer
Environmental & Corridor Planning Division
Office of Railroad Policy and Development
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Section 106 Consultation, Link Union Station Project

Dear Ms. Zeringue:

Thank you for your letter of August 29, 2018. We offer the following response:

**Engineering Sections**
From our first involvement with the Link US project, we have been skeptical of consultant HDR's conclusion that none of the five historic bridges in the APE would be directly affected by the project. Besides our concerns about preserving the vertical relationship to the mainline, we were aware that HDR's conclusion was directly contradicted by the following disclosure in the NOI: "The Link US Project would also require modifications to existing bridges at city streets to accommodate new elevated tracks" (81 FR 34429). Your response, which merely repeated HDR's "no direct effect" conclusion, did nothing to resolve our doubts.

ORG 3-22

We believe FRA came down on the wrong side of this issue. We find it unacceptable to be told that "engineering sections will be included for review by the Section 106 consulting parties as the design progresses." Our request to review the sections that HDR had relied on had been reasonable and appropriate. If our concerns turn out in the end to be valid, many millions of dollars (possibly federal dollars) will have been spent pursuing a design that violates longstanding safely protocols.

For consultations to be meaningful, timing is everything. Reviewing a project's direction in its early stages is essential, before the time and expense of the EIS process has been incurred. Consultation after a design and environmental review are completed is not all that helpful, due to the inertia generated by all the decisions made during the process, not to mention the sunk costs.

TRAC, active since 1984, is dedicated to a vision of fast, frequent, convenient and clean passenger rail service for California. We promote these European-style transportation options through increased public awareness and legislative action.

**ORG 3-22** Metro appreciates the continued involvement from TRAC in the Link Union Station Project and for sharing the feedback in the comments provided. TRAC has had extended correspondence with Metro as a result of TRAC participating in Section 106 consultation with FRA.

Please refer to the 2019 Link US Project Final EIR, Final SEIR, Response to Comments for discussion on this letter dated October 9, 2018.

**Project Justification**
We think FRA should be aware of Metro's shifting project justifications.

In Jeanet Owens' March 22, 2017 (sic--it must have been 2018, because our first letters to Metro were dated July 2017) letter, which you provided us, she wrote: "To construct the proposed run-through tracks, which would span over the new Patsaouras Bus Plaza Station on the El Monte Busway and U.S. 101 freeway, the bridge superstructure for the new run-through tracks is required to meet Caltrans minimum vertical clearance requirements of 16.5 feet. For this reason, the rail yard and platform tracks vertical profile must be adjusted to match the required track profile elevation at the new Patsaouras Bus Plaza Station on the El Monte Busway."

The letter then goes on to say that "The Link Union Station project alternatives include a rail yard raise of 15 feet..." This statement is similar to the earliest project description. Note, however, that it is contradicted by a letter to us dated January 5, 2018 (attached) from Jeanet Owens. In that letter, Metro made the major admission that "the Patsaouras Plaza Busway Station ... is outside of the footprint of the proposed Link US run-through tracks structure and therefore does not pose additional design constraints to the Link US project."

ORG 3-23

While clearing the 101 freeway might require raising the tracks a couple of feet, there is admittedly no justification for raising them 15 feet, an extraordinarily expensive undertaking whose actual purpose is unrelated to improving rail operations.

From the beginning of our involvement with this project, TRAC has been concerned that Metro lost sight of the project's original purpose: to provide run-through tracks to vastly increase increase the train-handling capacity of Union Station. Instead, Metro has been fixated on providing retail "opportunities" in the station. In the pursuit of retail, we saw the 15 foot track raise as a potential threat to the safety of rail operations. Perhaps even worse, we saw the possibility that the station design would become so costly as to become unbuildable, thereby delaying the run-through tracks indefinitely.

Based on the scant information that has been made available to us, we believe the Throat and Elevated Rail Yard, and the New Passenger Concourse Project Alternatives to be not only infeasible, but to have been premised on a fundamentally incorrect clearance analysis of the busway station. Metro's recommendation this week of an "Above-Grade Concourse" is an admission that pursuing these alternatives has been an avoidable waste of public funds. A critically important infrastructure project has been unnecessarily delayed.

TRAC, active since 1984, is dedicated to a vision of fast, frequent, convenient and clean passenger rail service for California. We promote these European-style transportation options through increased public awareness and legislative action.

**ORG 3-23** Since 2018, the Link US Project has evolved and 14 potential track alignments and 6 potential concourse concepts were thoroughly reviewed to determine if they meet the designated criteria for track alignments and concourse concepts. As discussed in the Final EIS Chapter 2.0, Alternatives and Design Options Considered, the track alignment and concourse concept design considered in the Final EIS was carefully selected through a screening process, which included design considerations for engineering feasibility, safety, community preferences, and optimization of LAUS spaces.

We sought to bring these issues to an early resolution, before more time and money were wasted. However, we have been blocked not only by Metro but by the FRA, in the letter to which we are now responding. We will be sharing this letter with the members of Congress with rail oversight responsibilities.

ORG 3-23 Contd.

The undersigned is presently touring German railway stations, looking for concepts applicable to LAUS. It has become clear that modern rail stations need a passenger concourse or passenger concourses with substantial retail. People that have adopted a transit lifestyle need the convenience of pedestrian access to a multitude of products and services, including a full grocery store, drug stores, nail salons, hairdressers, numerous retailers and a tremendous variety of eating establishments. Based on the experience of much smaller German cities, Los Angeles could certainly support all that activity.

ORG 3-24

We believe that Metro failed to give adequate weight to how its plans would impact an active terminal. We've seen no detailed discussion of constructability. TRAC urges a reconceptualization of the project, starting with the question: "How can we add new passenger facilities without interfering with ongoing operations?" If that question cannot be answered in the positive, there is no point to further work on a new passenger concourse.

If a concourse can be constructed above the existing platforms, we urge that the existing tunnel remain open for those seeking to travel between the station, Metro and the Bus Plaza. Forcing such passengers to go up one level, only to then come back down to ground level, would be obnoxious.

ORG 3-25

This is a project of immense complexity. As advocates for rail passengers, we are extremely concerned that the run-through tracks themselves have gotten lost in Metro's eagerness to please real estate interests. This harms the interests of the very people the project was ostensibly intended to serve, rail passengers. We trust that these comments will result in corrective action by FRA, as it continues to support this vitally needed project.

ORG 3-26

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
Vice-President for Policy

TRAC, active since 1984, is dedicated to a vision of fast, frequent, convenient and clean passenger rail service for California. We promote these European-style transportation options through increased public awareness and legislative action.

**ORG 3-24** The concourse-related improvements would include up to 160,000 square feet of transit-serving retail uses and up to 30,400 square feet of office/commercial uses.

**ORG 3-25** The Link US Team has developed a detailed construction phasing plan to minimize disruptions to the various local/regional/intercity transit/rail and bus operators and passengers that utilize LAUS.

**ORG 3-26** Please refer to the 2019 Link US Project Final EIR, Final SEIR, Response to Comments for discussion on this letter dated October 9, 2018.

# Metro: Transit Provider or Developer? -- LA Union Station Quandary

**By Susan MacAdams**
**TRAC Board Member**

Los Angeles Union Station, one of the great train stations in America, is undergoing a hugely ambitious redevelopment scheme called "LINK US," formerly known as "The Union Station Master Plan" and the "Southern California Regional Interconnector Project" or SCRIP. This project is intended to expand station capacity to handle much larger passenger volumes. First, to improve passenger access to the tracks, it would reconfigure access, adding a large amount of retail development under the tracks; second, it would incorporate run-through tracks for Amtrak, Metrolink and high speed rail.

**The Proposal**

Currently the station is stub-ended; trains enter the station area to pick up and drop off passengers, then exit in the reverse direction. Run-through tracks would greatly increase the station's capacity by eliminating turn-around times. However, redevelopment appears to be the main goal of current LINK US plans. This plan would build a shiny steel and glass mall that clashes with Union Station's Spanish Colonial - Art Deco architecture.

Currently, Union Station has several garden courtyards that knit together outdoor space with the interior waiting room and ticketing areas. Placing the new addition under the tracks turns its back on the grandeur of this existing infrastructure. The total LINK US project's estimated cost of $2.2 billion dollars could be better spent by building two new light rail lines or adding more buses, or by just simply building bus shelters in the San Fernando Valley.



**Los Angeles Union Station, view through Main Waiting Room to train boarding area.**
Photo By Alan Weeks. Used with permission.

The Los Angeles Co. Metropolitan Transportation Authority (Metro) has not overhauled its bus system in more than 25 years, yet during that time has added more than 500 miles of rail lines. When the rail lines were opened, the plans did not include adding local circulator buses to each rail or high-speed bus station. Many of the Metro buses run only once an hour. This greatly discourages ridership. As a result, the number of passengers using the buses has declined.

The original run-through track project more than ten years ago called for an extension of three tracks. Current plans would demolish all

**(continued on Page Two)**

**INSIDE**

**PAGE 3**
COAST OBSERVATIONS
**PAGE 6**
PALM SPRINGS RAIL?
**PAGE 7**
ELECTRIC "FAST FREIGHT" IN CA?
**PAGE 8**
INTERCITY VS. COMMUTER TRAINS

## LA Union Station

**(continued from Page One)**

Union Station platforms and rebuild them fifteen feet higher to create a retail opportunity. The years of demolition and construction would make Amtrak and Metrolink service just about unusable for passengers. After construction, the retail and food concourse would become an unpleasant obstacle course with dust, vibration, and excessive noise from the trains traveling directly overhead.

There are many existing, underutilized spaces within Union Station better suited to retail and food services, including the former ticketing concourse at the front of the terminal. The oversized Amtrak baggage handling room immediately north of the boarding area could be relocated to less valuable space. The double doors of this room open onto a shaded courtyard, also underutilized. This location is ideal for a brew pub, upscale restaurant, or food court, but is not being considered in the new plans, even though it could literally save billions, and preserve functionality for passengers.

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California Rail News encourages letters, comments, and reports on local issues. Please submit your material to California Rail News at the above address. Sorry, we cannot guarantee return of photos or articles submitted. Deadline for material to be included in the next issue of CRN is Sept. 1, 2017.

At Union Station today is a large Amtrak baggage handling room that is underutilized. The double doors of this room open onto a shaded courtyard, also underutilized. This location is ideal for a brew pub or upscale restaurant but is not being considered in the new plans.

The LINK US study also seems to disregard the needs of the many senior travelers and those with disabilities who use Union Station. These riders us motorized shuttles that require ramps. When raising the tracks 15 feet, all ramps would be demolished and not replaced. The number of steps passengers need to climb would increase from 25 to 50 steps! This formidable increase would slow passenger flow and probably not comply with the ADA.

A local example of excellent railway station preservation and adaptive reuse is the former Pasadena Santa Fe Railway depot. The old waiting room is a now a trendy restaurant and the baggage room is a upscale pizzeria. The oversized windows of the baggage room originally served horse-drawn carriages. They were cost-effectively reused, with period-correct screens and wooden shutters that close at night. The depot's interior features the original custom-made chandeliers and rare Batchelder tiles. This is an excellent example of sensitive and efficient preservation when planning new construction at historic Union Station.

**Safety Concerns**

Raising the platforms by fifteen feet also creates serious safety issues: platform tracks would be higher than the mainline tracks. This violates a fundamental principle of railyard design; runaway trains from the station become a risk, potentially causing major accidents on the mainline freight and passenger routes along the Los Angeles River.

This sort of accident occurred at Lac-Megantic, Canada, garnering international attention. Brakes were not properly set, allowing the train to roll down the grade and derail, with a great loss of life and property. There is a possibility that a passenger train could roll out of Union Station and collide with a freight train carrying hazardous materials along the mainline tracks. Raising the tracks 15 feet to add a new passenger concourse underneath does not sufficiently consider safety.

It also does not take into account the extensive special trackwork (a complex arrangement of switches) that surrounds Union Station. This trackwork is some of the most exten-sive and unique on the West Coast. It must be built on basically flat ground to be kept operational.

If the tracks are raised 15 feet in the station, the tracks along the LA River must be raised even higher, to prevent runaway trains. That would require tearing down several historic bridges that cross the river and rebuilding them higher. That would mean the profile of several of the busiest of streets of Los Angeles would have to be raised, affecting utilities, sidewalks and storefronts.

**Conclusion**

The Metro Board has approved spending over $70 million to study LINK US, of which $25 million has already been spent. Despite the fact that these concerns have been made clear to both staff and the Board, project planning continues unaffected. Clearly, Metro is not listening.

The LINK US project should be revised to eliminate the new retail concourse, and focus on the much-needed run-through tracks. The original 1933 Union Station design included plans for expanding passenger access to the train plat-forms: two new tunnels could be built parallel to and on either side of the now-main corridor.

Adding these tunnels would allow for a significant increase in passenger volumes, at a very economical cost compared to the $2.2 billion mega-project being considered.

Canceling station redevelopment would allow funding for adding circulator buses at train stops and building bus shelters throughout Los Angeles County. Although real estate interests would not be happy, this course of action would be much more beneficial to the taxpaying public.

*Susan MacAdams is a TRAC Board Member, a Los Angeles Union Station Historical Society Board Member, and former High-Speed Rail Planning Manager for Metro, where she had extensive responsibilities for Union Station.*

Metropolitan Transportation Authority
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Los Angeles, CA 90012-2952
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Metro

January 5, 2018

David Schonbrunn
Vice-President for Policy
Train Riders Association of California (TRAC)
P.O. Box 151439
San Rafael, CA 94915-1439

Dear Mr. Schonbrunn,

Thank you for your letters sent on July 18, 2017 and July 24, 2017. The Link Union Station (Link US) project team has received your comments about the project and we appreciate your input. We are responding to comments in your letter dated July 24, 2017 which appears to supersede the earlier letter.

At the July Planning and Programming Committee meeting, Metro staff provided an update on a new expanded passenger concourse option that is above the rail yard (referred to thereafter as the above-grade concourse option), in addition to the previously studied at grade concourse option that is below the rail yard (referred to thereafter as the at-grade concourse option). As indicated in the staff report, regardless of whether the passenger concourse is at-grade or above-grade, raising of the rail yard by up to 15 feet is needed to provide the minimum vertical clearance of 16.5 feet over the El Monte Busway and US-101 freeway below the proposed run-through tracks viaduct structure as described in detail below:

- The El Monte Busway is primarily used by local and regional buses operated by LA Metro and Foothill Transit serving communities in the San Gabriel Valley, eastern edge of the LA County as well as Montclair in the San Bernardino County. It is also an extension of the I-10 Toll Expressway into downtown Los Angeles. The Patsaouras Plaza Busway Station Project, which is currently in construction and was designed to improve connection from buses using the El Monte Busway to the Patsaouras Plaza and LAUS, is outside of the footprint of the proposed Link US run-through tracks structure and therefore does not pose additional design constraints to the Link US project.

- The segment of the US-101 to the south of LAUS is an eight-lane freeway connecting I-10, SR-60, I-5 and SR-110/I-110 within a 2-mile radius, and is heavily congested throughout most of the day 7 days a week. Given that the area on both sides of the US-101 is fully developed, Caltrans has indicated that this segment of US-101, along with the existing northbound ramps at Alameda Street and southbound ramps at Commercial Street, cannot be physically widened, lowered, or significantly modified.

As part of the National Environmental Policy Act (NEPA) Section 106 process, Metro and FRA will explore additional alternatives to the new at-grade and above-grade passenger concourse options, given the historic significance of the existing passageway. One of alternatives will include maintaining the existing passageway while adding additional pedestrian tunnels/passages to accommodate the projected increase in passengers using LAUS.

Currently, the Link US project is in the early environmental and planning phase. The draft environmental document is tentatively scheduled for public release as early as spring 2018, at which time public comments will be accepted and recorded. This is a tentative schedule and is subject to change. Included with this letter are the most recent Link US Fact Sheet and Frequently Asked Questions (FAQ) for further information.

Your participation and input is critical to the process. Your contact information has been added to our project database to ensure you are notified of all updates and opportunities to participate. Please let us know if there is any additional information we can provide to you at this time. Thank you for your interest in the Link US project.

Sincerely,

Jeanet Owens, P.E.
LA Metro
Senior Executive Officer - Project Management / Regional Rail

cc: Metro Board of Directors

LinkUnionStation@metro.net
Metro.net/linkus
Facebook.com/regionalrail

**Comment Number:** ORG 4

**Name:** Jeremy Stutes, The Transit Coalition

**Date Received:** 08/06/24

**Format Received:** Info Line

Hi, this is Jeremy Stutes, from the Transit Coalition, Director of Special Products. We were looking over the presentation and had some questions about the new revised proposal to do the project into two phases for Link Union Station. So if you could get back to me as soon as possible. That would be very helpful in us submitting public comments. Thanks. ORG 4-1

**ORG 4 Jeremy Stutes, The Transit Coalition**

**ORG 4-1** Metro appreciates the comments provided by The Transit Coalition and for participating in this process. Please see the responses to these comments below.

**Comment Number:** ORG 5

**Name:** Jeremy Stutes, The Transit Coalition

**Date Received:** 08/06/24

**Format Received:** Email

Hello,

I was looking at the public presentation at https://www.linkunionstation.com and could not find all the information I needed to make informed public comment. Can you please help me understand more about the phased approach to adding run-through tracks on the rail bridge that will be constructed over the freeway? ORG 5-1

During the first phase of construction, will the two tracks over the freeway be bidirectional? ORG 5-2

Which of the tracks being added will service high-speed rail? ORG 5-3

Will the bridge over the freeway be built to accommodate all of the additional tracks in the full build-out? ORG 5-4

Is the plan to come back again with construction crews and close the bridge when adding the additional tracks? ORG 5-5

What will the impacts of phase two construction be on operations at Union Station in terms of rail access and how long will those impacts last? ORG 5-6

How will the maxim capacity, directional access, and public benefits of operations be different under phase 1 and phase 2? ORG 5-7

Will construction stop between phases and if so what are the additional costs of rehiring and training construction workers? ORG 5-8

Jeremy Stutes

Director of Special Projects

The Transit Coalition

[redacted]

**ORG 5 Jeremy Stutes, The Transit Coalition**

**ORG 5-1** Please refer to Final EIS Chapter 2.0, Alternatives and Design Options Considered, and Final EIS Chapter 9.0, Build Alternative Design Option for a detailed description of two main phases of implementation of the infrastructure improvements considered (the interim condition and the full build-out condition) for the Build Alternative and Build Alternative Design Option, respectively.

During the interim condition, the run-through track infrastructure south of LAUS would be implemented, in addition to the associated signal modifications, property acquisitions, and civil/structural improvements to facilitate new run-through service. The interim condition does not include new lead tracks north of LAUS, or the partially elevated rail yard and new concourse-related improvements at LAUS. During the full build-out condition, new lead tracks and the elevated throat north of LAUS, the partially elevated rail yard and concourse-related improvements at LAUS, and additional run-through tracks south of LAUS would be implemented (Build Alternative Design Option). After completion of the components for the full build-out condition, HSR tracks would be electrified and operational through the Project limits.

**ORG 5-2** Yes, during the first phase of construction, the two tracks over the freeway will be bidirectional.

| | |
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| | **ORG 5-3** For the Build Alternative Design Option, HSR trains would utilize Platforms 3 and 4 with associated Tracks 5 through 8.<br><br>**ORG 5-4** Yes, in the interim condition a common viaduct over the El Monte Busway and US-101 would be constructed with a deck wide enough to support future regional/intercity rail run-through tracks and HSR run-through tracks.<br><br>**ORG 5-5** Please refer to the Comment ORG 5-4 response above. Future tracks would be constructed using methods that could maintain railroad operations on existing tracks that are located on the run-through structure. In other words, Metro will complete the concrete structure as part of the interim condition, and future tracks could be added a later time.<br><br>**ORG 5-6** During the 6-year duration of planned construction, station and rail yard tracks would remain operational. However, as disclosed in Final EIS Section 3.3, Transportation, schedule delays and increased dwell times at LAUS would lead to decreased performance for rail operators and could cause a ripple effect at other nearby station locations because not all lead tracks and rail yard tracks and platforms would be in service at one time. Mitigation Measure TR-2 requires Metro to prepare an MOU with each current rail operator and for detailed temporary construction staging plans to be implemented that outline mutually agreed upon on-time performance goals to be achieved throughout construction. |

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| | | Additionally, Mitigation Measure TR-2 would also require that throughout the duration of construction, SCRRA be responsible for monitoring how mutually agreed upon on-time performance is met. |
| | **ORG 5-7** | Construction Build Alternative Design Option components in the interim condition includes implementation of the run-through track infrastructure south of LAUS, while the full build-out condition includes the construction of new lead tracks, the elevated throat north of LAUS, the partially elevated rail yard and concourse-related improvements at LAUS, and additional run-through tracks south of LAUS. From a train operations perspective, the difference between the interim condition and the full build-out condition is that more regional/intercity rail trains (Metrolink, Amtrak, and LOSSAN) would operate through LAUS because additional run-through track capacity would be available during the full build-out condition. During operation of the full build-out condition, operational capacity would be enhanced with full use of tracks in the rail yard and the full Project benefits will be realized with completion of infrastructure improvements, new lead tracks, and concourse-related improvements.<br><br>During construction of the interim condition, the Project would benefit the local economy through generation of employment; labor income; and federal, state, and local tax revenues. As discussed in the Final EIS Appendix D, *Community Impact Assessment*, Section 6.6.3, the full build-out condition is anticipated to result in improved |

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| | | operational efficiency, capacity, flexibility, and connectivity for trains using LAUS, which would provide a wide range of beneficial impacts on the community as a whole and to transit users especially. Additionally, the full build-out condition would directly benefit the public through creation of retail jobs due to the addition of retail areas at the concourse. This retail space would generate employment, labor income, and tax revenues. A summary of all Project-related benefits is outlined in the Final EIS, Executive Summary, Section ES.14. |
| | **ORG 5-8** | In the event where Project construction must halt during or between construction phases, workforce, workforce training, and any funding would be coordinated by Metro. Additional costs for workforce and workforce training would be under discretion of Metro and are not an environmental issue required for analysis in the CEQA and NEPA documentation. The environmental impact evaluation is purposely conservative by evaluating potential effects assuming all major Project elements would be constructed concurrently. If run through track infrastructure south of LAUS is constructed prior to the elevated rail yard and concourse-related improvements, fewer construction-related effects and associated truck trips are anticipated to occur than disclosed in the Final EIS because the evaluation assumes all major components are constructed concurrently. |

**Comment Number:** ORG 6

**Name:** Eli Lipmen, Move LA

**Date Received:** 08/08/24

**Format Received:** Online Comment Form

Move LA is in support of this project. It will create a world-class transportation network, vastly improve service, and improve the experience for transit riders in the region. ORG 6-1

**ORG 6 Eli Lipmen, Move LA**

**ORG 6-1** Metro appreciates Move Los Angeles's support for the Link Union Station Project.

| | |
|---|---|
| **Comment Number:** ORG 7<br><br>**Name:** Amy Gantvoort, LA Derby Dolls<br><br>**Date Received:** 08/08/24<br><br>**Format Received:** Email<br><br>Please see the attached letter sent on behalf of the Los Angeles Derby Dolls, located at 2661 E. 46th Street, Vernon, CA 90058, providing comments on the draft EIS/SEIR.<br><br>Please do not hesitate to contact me if you have any questions.<br><br>Thank you.<br><br>Amy M. Gantvoort<br><br>Los Angeles Derby Dolls<br><br>President of the Board of Directors | **ORG 7 Amy Gantvoort, LA Derby Dolls** |

**Derby Dolls**
**2661 E. 46th St.**
**Vernon, CA 90058**

Sent via email only: linkunionstation@metro.net
Metro
Attn: Carlos J. Montez
Deputy Executive Officer
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

RE: Link US - Draft EIS/SEIR

Dear Carlos J. Montez,

Regarding the Link US - Draft EIS/SEIR, the Los Angeles Derby Dolls (LADD) are a non-profit (Tax ID # 82-3100150 as CA Derby Dolls) athletic organization that operates a facility directly impacted by the proposed track alignment for the Malabar Rail Yard on 46th Street. We are located at 2661 E 46th Street and run one of only four full time banked track roller derby facilities in the country, offering programming 7 days a week for participants as young as seven years old, all the way to any adult willing and able to strap on skates. The league comprises four adult teams and three junior teams, and we stage public matches every month in order to support the infrastructure needed to provide this one of a kind community facility. ORG 7-1

As such, we have noted deficiencies in the environmental analysis in the Draft Environmental Evaluation of Malabar Yard Mitigation (Appendix Q).

- Section 3.1.2 Environmental Topics Requiring No Further Evaluation (p. 3.1-5)
  - Subsection 3.15, Socioeconomic and Communities Affected states: *Recreational Opportunities – There are no parks or recreational facilities open to the public in the Malabar Yard study area. Parks and recreational facilities located outside of the Malabar Yard study area would not be affected due to the nature of proposed railroad improvements. The Malabar Yard railroad improvements do not include residential development that would directly generate population growth or increase the demand for parks and recreational facilities. Therefore, no direct physical impacts or alterations to existing parks would result from the Malabar Yard railroad improvements and no effect would occur.* ORG 7-2
  - Our facility is located on East 46th Street, precisely where the rail extension is proposed.

- Section 3.5 Air Quality and Global Climate Change - Sensitive Receptors (p. 3.5-13) ORG 7-3
  - Per the text:

**ORG 7-1** Metro appreciates the comments provided regarding the potential impacts of the Link US Project, including Malabar Yard railroad improvements, on the Los Angeles Derby Dolls (LADD) and their facility located on 46th Street in the City of Vernon. The Draft EIS/SEIR recognizes that nearby businesses, organizations, and recreational facilities may experience temporary or operational impacts during construction and operation phases; however, the property located at 2661 East 46th Street is not located within the Project footprint where direct impacts would occur; therefore, the property where LADD operates would not be physically affected during construction or operation of the Malabar Yard railroad improvements.

In the meeting on January 24, 2025, Metro met with Members of the LADD and acknowledged that Metro will continue to coordinate with the property owner to refine their parcel-specific conceptual design during the final design and right of way process. Metro is committed to engaging with affected organizations, including LADD, to minimize disruptions and explore potential mitigation strategies. Efforts will focus on maintaining continued access, coordinating schedules, and addressing specific operational needs to prevent displacement and support the organization's valuable contributions to the community.

Metro values the role of diverse sports and recreational activities in the region and will strive to balance Project goals with the needs

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| | | of community organizations like LADD, recognizing their importance in fostering local engagement, skill-building, and community growth. Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements and working collaboratively to identify solutions. |
| | **ORG 7-2** | The building located at 2661 East 46th Street is located on the north side of the 46th Street roadway opposite to where the 46th Street Connector and associated railroad infrastructure is proposed. In the Draft EIS/SEIR Section 3.1.2, recreational facilities are intended to refer to active or passive outdoor recreation areas that are open to the general public such as neighborhood parks or athletic fields at municipal recreation facilities. While the industrial building located at 2661 E. 46th Street is leased for a recreational purpose, the land use does not constitute a recreational use. |
| | **ORG 7-3** | The commenter states that the facility located at 2661 East 46th Street is a roller derby facility within 0.25 mile of the Project footprint and should be considered a sensitive receptor. However, as outlined in the South Coast Air Quality Management District (SCAQMD) Rule 1470, not all athletic facilities are considered sensitive receptors. Rule 1470 defines sensitive receptors as residences (private homes, condominiums, apartments, etc.), schools, daycare centers, |

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| | and health facilities, such as hospitals or nursing homes.<br><br>Athletic facilities are considered sensitive receptors only if they are associated with a school or school grounds. SCAQMD defines school or school grounds as any public or private school used for the education of more than 12 children in kindergarten or grades 1 to 12, including related buildings, playgrounds, and athletic fields. However, a roller derby facility does not meet these criteria, as it is not part of a school or residential facility.<br><br>Therefore, the building located at 2661 E. 46th Street that is used for a roller derby facility does not fall under the definition of a sensitive receptor according to SCAQMD's definition. The statement that there are no sensitive receptors within 0.25 mile of the Project footprint remains accurate. |

*Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, **athletic facilities**, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 2021).*
*No sensitive receptors are located within a one-quarter mile of the Project footprint for the design options considered.*
- Note that "athletic facilities" are considered sensitive receptors, therefore the notion that there are no sensitive receptors within one-quarter mile of the Project footprint is false.

ORG 7-3 Contd.

- Section 3.6.3 Noise and Vibration Affected Environment (p. 3.6-7)
  - Per the text:
    *The closest noise- and vibration-sensitive land use is a place of worship (Holy Angels Church of the Deaf, FTA Category 3 use) located at 4433 South Santa Fe Avenue, west of Malabar Yard and south of the Vernon Avenue/Pacific Boulevard intersection. The church is located behind intervening buildings and is outside of the 1,000-foot FTA screening distance as depicted in Figure 3.6-1. Additionally, there are no FTA Category 1 or 2 uses within 1,000 feet of Malabar Yard.*
  - As noted, as an athletic facility, we should be considered a sensitive use. Per the FTA's Transit Noise and Vibration Impact Assessment Manual, our facility should be considered a FTA-3

ORG 7-4

  - Based on our proximity, the evaluations of the two options are incomplete. In particular, this conclusion for Topics 3.6-A and 3.6-C (p. 3.6-9):
    *Direct Effects - Construction*
    *... Since there are no noise-sensitive land uses within 150 feet, no direct adverse effect would occur.*
    *Direct Effects - Operation*
    *The 46th Street connector would be located between two active rail lines. Therefore, there would be no perceptible change in operational noise under either design option. No direct adverse effect would occur.*

ORG 7-5

  - Based on our proximity, the evaluations of the two options are incomplete. In particular, this conclusion for Topics 3.6-b (p. 3.6-17):
    *Direct Effects - Construction*
    *... distance that eliminates concern of structural damage, or 140 feet of vibration-sensitive land uses, a distance that would be considered for frequent vibration over the course of several days and potential annoyance from such activity. No adverse effect would occur.*
    *Direct Effects - Operation*

ORG 7-6

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**ORG 7-4** Metro assessed air quality impacts using different criteria than those applied to noise and vibration impacts. The LADD business is not considered a noise- or vibration-sensitive receptor according to FTA/FRA guidelines. The FTA/FRA categorizes land uses into three categories based on their sensitivity to noise and vibration:

- Category 1 (outdoor): High sensitivity uses like outdoor amphitheaters or national historic landmarks with significant outdoor use.
- Category 2 (assessed outdoor): Generally residential uses but also includes places where people sleep, such as hotels or hospitals.
- Category 3 (outdoor): Institutional land uses such as schools, libraries, and churches with daytime use, or areas for meditation, such as monuments and museums.

Recreational facilities with active uses, like a roller derby facility, are not considered sensitive to noise or vibration and do not qualify as a Category 3 land use under FTA/FRA guidelines. These types of facilities involve high-energy activities and large crowds, which do not qualify as passive uses, such as a park bench. Therefore, roller derby facilities are not classified as noise or vibration-sensitive receptors.

**ORG 7-5** Please refer to the Comment ORG 7-4 response for a discussion regarding the

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| | definition of noise and vibration-sensitive receptors.<br><br>**ORG 7-6** Please refer to the Comment ORG 7-4 response for a discussion regarding the definition of noise and vibration-sensitive receptors. |

*The 46th Street Connector would be located between two active rail lines. No adverse effect would occur.*

- There is no current rail alignment on 46th Street that reaches the levels of use anticipated for this connection, therefore, the noise and vibrations in both construction and operation would be a substantial increase from current conditions. Our Facility is located within 140 feet of the proposed alignment on 46th Street and therefore would be subject to the impacts dismissed in the text above.

ORG 7-7

- Section 3.15 Socioeconomic and Communities Affected
  - This section fails to recognize our facility as a Community Facility. LADD operates as a non-profit and partners with the City of Vernon through the CommUNITY Fund to provide activities for neighborhoods in Vernon and the surrounding communities.
  - Though a non-profit, we are still a business and must operate like one. Potential impacts of this project may inhibit our ability to host revenue generating events and grow, let alone retain active participants. These conditions may inhibit our ability to effectively operate at the location we've managed to thrive in for the past 5 years.

ORG 7-8

Therefore, we request proper analysis of the impacts of this project to our facility, including operational times and movement along the proposed 46th Street Connector.

ORG 7-9

Proper analysis pending, LADD supports the adoption of Option 1, southern alignment of the 46th Street rail connection. Narrowing of the roadway and moving the tracks closer to our facility will have a negative impact on our daily operations and monthly public events. As a grassroots, non-profit entity, we have worked hard to carve out a home at this location in Vernon after several other moves across Los Angeles. Anything that may impact our ability to maintain this venue threatens our long term organizational operations and viability. This includes the health and well being of our youth and adult skaters, as well as all the guests and supporters who attend programming at the facility.

ORG 7-10

Thank you for your consideration.

Sincerely,

Amy Gantvoort

Amy M. Gantvoort
President of the Board of Directors, Los Angeles Derby Dolls
(310) 869-3173/agantvoort@yahoo.com

3

**ORG 7-7** At each end of the 1,000-foot 46th Street Connector, BNSF currently uses two existing spur lines to serve existing customers (West Seville and East Seville Connections are shown in Final EIS Volume III Introduction, Figure 4). Existing freight railroad operations already occur on both sides of the subject property and these operations would continue; therefore, the Malabar Yard railroad improvements, which include the 46th Street Connector, would not substantially increase noise or vibration over the existing condition. In addition, please refer to the Comment ORG 7-4 response for a discussion regarding the definition of noise and vibration-sensitive receptors.

**ORG 7-8** Metro recognizes the importance of LADD as a vital community facility, particularly in its role as a non-profit organization that partners with the City of Vernon to provide activities for local neighborhoods and values the contributions made by LADD to the community.

The Draft EIS/SEIR includes a comprehensive evaluation of the potential socioeconomic and community impacts of the Malabar Yard railroad improvements, including effects on businesses and nonprofit organizations. Metro understands that, as a business, LADD must also maintain the ability to operate and generate revenue, and Metro is committed to minimizing any disruptions to your operations.

The Project team will work closely with LADD and other affected community facilities to

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| | | reduce potential impacts, such as access issues, noise, or disruptions from construction, and will implement mitigation measures outlined in the Final EIS Appendix Q, Environmental Evaluation of Malabar Yard Mitigation to reduce identified adverse effects.<br><br>After the close of the 45-day public comment period, Metro facilitated a virtual meeting with LADD members to discuss potential impacts and develop solutions that allow the organization to continue thriving in its current location while balancing the needs of the Project.<br><br>Metro appreciates the feedback provided and will continue to coordinate with LADD so that this facility's needs are considered in the ongoing planning and mitigation efforts. |
| | **ORG 7-9** | Please refer to Comment ORG 7-2 through ORG 7-8 responses. |
| | **ORG 7-10** | Metro appreciates LADD's support of Option 1, the southern alignment for the 46th Street Connector. Metro acknowledges the concerns regarding the location of new tracks closer to the LADD facility. Final EIS Appendix Q, Environmental Evaluation of Malabar Yard Mitigation, Chapter 2.0, Table 2-4 and Figure 2-11, identify the properties that would be directly affected by implementation of the Malabar Yard railroad improvements at 46th Street for either of the design options considered. As shown, even under Design Option 2, where the tracks would be located closer to the LADD facility (northern alignment), the LADD facility itself |

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| | would not be physically impacted. Therefore, the daily operations of the LADD facility, including LADD's ability to host public events, would not be negatively affected, nor would the health and well-being of its users be compromised. |

**Comment Number:** ORG 8

**Name:** Ellen Endo, Little Tokyo Business Association

**Date Received:** 08/09/24

**Format Received:** Email

Mr. Montez,

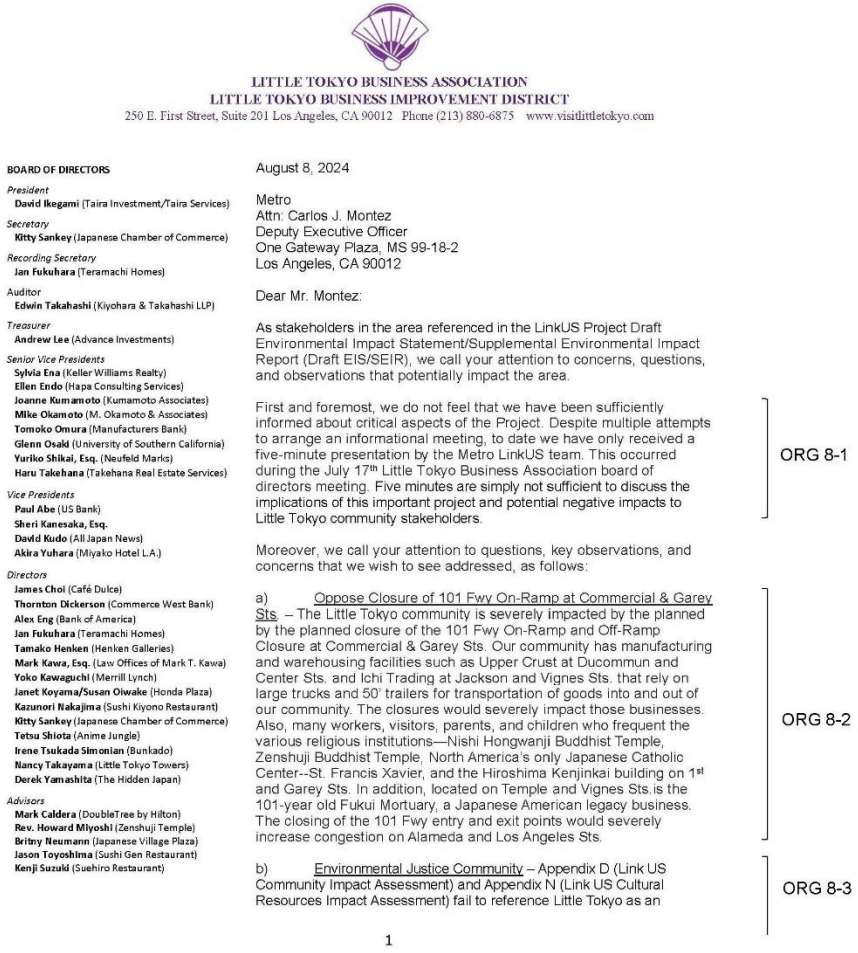
Attached please find comments from Little Tokyo Business Association board of directors. Should have questions or are unable to open the file, please feel free to call me at the number below.

Ellen Endo

Senior Vice President

[redacted]

**ORG 8 Ellen Endo, Little Tokyo Business Association**



LITTLE TOKYO BUSINESS ASSOCIATION
LITTLE TOKYO BUSINESS IMPROVEMENT DISTRICT
250 E. First Street, Suite 201 Los Angeles, CA 90012 Phone (213) 880-6875 www.visitlittletokyo.com

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August 8, 2024

Metro
Attn: Carlos J. Montez
Deputy Executive Officer
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

Dear Mr. Montez:

As stakeholders in the area referenced in the LinkUS Project Draft Environmental Impact Statement/Supplemental Environmental Impact Report (Draft EIS/SEIR), we call your attention to concerns, questions, and observations that potentially impact the area.

First and foremost, we do not feel that we have been sufficiently informed about critical aspects of the Project. Despite multiple attempts to arrange an informational meeting, to date we have only received a five-minute presentation by the Metro LinkUS team. This occurred during the July 17th Little Tokyo Business Association board of directors meeting. Five minutes are simply not sufficient to discuss the implications of this important project and potential negative impacts to Little Tokyo community stakeholders. ORG 8-1

Moreover, we call your attention to questions, key observations, and concerns that we wish to see addressed, as follows:

a) Oppose Closure of 101 Fwy On-Ramp at Commercial & Garey Sts. – The Little Tokyo community is severely impacted by the planned by the planned closure of the 101 Fwy On-Ramp and Off-Ramp Closure at Commercial & Garey Sts. Our community has manufacturing and warehousing facilities such as Upper Crust at Ducommun and Center Sts. and Ichi Trading at Jackson and Vignes Sts. that rely on large trucks and 50' trailers for transportation of goods into and out of our community. The closures would severely impact those businesses. Also, many workers, visitors, parents, and children who frequent the various religious institutions—Nishi Hongwanji Buddhist Temple, Zenshuji Buddhist Temple, North America's only Japanese Catholic Center--St. Francis Xavier, and the Hiroshima Kenjinkai building on 1st and Garey Sts. In addition, located on Temple and Vignes Sts.is the 101-year old Fukui Mortuary, a Japanese American legacy business. The closing of the 101 Fwy entry and exit points would severely increase congestion on Alameda and Los Angeles Sts. ORG 8-2

b) Environmental Justice Community – Appendix D (Link US Community Impact Assessment) and Appendix N (Link US Cultural Resources Impact Assessment) fail to reference Little Tokyo as an ORG 8-3

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**ORG 8-1** Metro understands the importance of engaging with the community and providing adequate information about the Project. Metro is committed to working with community stakeholders and providing opportunities for meaningful engagement. During preparation of the Final EIS, Metro facilitated a more comprehensive informational session to provide in-depth discussions on the Project and address comments raised on the Final EIS.

Metro has implemented a comprehensive stakeholder engagement and outreach process throughout the environmental phase, using both formal and informal methods, such as in-person and virtual public meetings, business and community organization briefings, distribution of legal advertisements, email blasts, and social media engagement. These outreach activities demonstrate that Metro and CHSRA met and exceeded legal requirements to engage all affected communities in the decision-making process. As detailed in Final EIS Chapter 4.0, Chapter 8.0 (Public and Agency Outreach), and Appendix D (*Community Impact Assessment*), and summarized below, Metro held 12 stakeholder meetings with the Little Tokyo Business Association/Little Tokyo Business Improvement District and Little Tokyo Community Council between 2016 and 2019. After certification of the Final EIR in 2019, stakeholder engagement and outreach activities conducted in 2020 and 2021 were primarily related to the Malabar Yard railroad improvements component of

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| | the Project in the City of Vernon. During 2021 and 2022, the environmental process related to elements of the Project in Los Angeles were placed on hold while certain elements of design in the City of Vernon were revised. While the majority of stakeholder engagement and outreach activities were paused in 2021 and 2022, Metro did hold multiple regular town hall meetings throughout this two-year timeframe to provide updates on Central Los Angeles projects, including the Link Union Station. The Town Hall meetings were attended by members of Metro's Community Leadership Council, which includes a representative from Little Tokyo. Metro resumed engagement in 2024 to continue working with stakeholders, including the Little Tokyo Business Improvement District.<br><br>A summary of the 12 stakeholder outreach meetings with the Little Tokyo Business Association/Little Tokyo Business Improvement District and Little Tokyo Community Council held from 2016 to 2024, and the additional engagement opportunities with representatives of Little Tokyo community (Historic Cultural Neighborhood Council and Central Los Angeles Region Town Hall Meetings) are summarized below.<br><br>*Little Tokyo Business Association/Little Tokyo Business Improvements District*<br>• June 16, 2016<br>• September 21, 2016<br>• November 15, 2016 – Community Update Meeting |

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| | • May 2, 2018 – LAUS Roundtable Workshop<br>• November 30, 2018 – LAUS Roundtable Workshop<br>• April 17, 2019 – FEIR<br>• June 3, 2019<br>• July 17, 2024 – DEIS/SEIR Project Briefing<br><br>*Little Tokyo Community Council – All Committees*<br>• November 2, 2017 – LAUS Roundtable Workshop<br>• November 30, 2018 – LAUS Roundtable Workshop<br>• January 17, 2019 – DEIR briefing<br>• January 22, 2019 – DEIR briefing at LTCC General Meeting<br>• April 23, 2019 – FEIR<br><br>*Historic Cultural Neighborhood Council (included Little Tokyo Representatives)*<br>• June 15, 2016<br>• July 12, 2016 – Project briefing at Japanese American Cultural and Community Center<br>• September 21, 2016<br>• November 15, 2016 – Community Update Meeting<br>• November 2, 2017 – LAUS Round Table Workshop |

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| | • February 12, 2018<br><br>*Central Los Angeles Region Town Hall Meetings*<br><br>• September 22, 2021<br>• November 17, 2021<br>• January 20, 2022<br>• March 17, 2022<br>• May 19, 2022<br>• February 28, 2024<br>• May 29, 2024<br>• September 25, 2024<br><br>The July 17, 2024 project briefing was only intended to provide a personal notification of the upcoming 45-day public comment period for the Draft EIS/SEIR Metro regrets the lack of engagement and response to Little Tokyo Business Association's (LTBA) earlier inquiries for Project information during the project development phase but values the opportunity to address concerns throughout the entire environmental process and subsequent construction phase.<br><br>After the close of the 45-day public comment period, Metro reinitiated engagement with LTBA by holding a meeting on February 20, 2025 for further coordination based on the comments received. The LTBA hosted the meeting to discuss the LTBA's concerns, comments, and requests related to general stakeholder engagement, the temporary closure of US-101 on/off ramps, the |

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| | | community's cultural/religion institutions, and other Link US Project related items such as pedestrian bridges, facility maintenance, and pickup/drop-off sites on Commercial Street. Metro is committed to ongoing engagement throughout the environmental, design, and construction phases of the Project. |
| | **ORG 8-2** | The Garey/US-101 ramps at Commercial Street will not be permanently closed as part of the Link US Project. Metro plans to implement most temporary roadway closures late at night or early in the morning on weekends, and will implement traffic management measures for large trucks (up to 50 feet) in accordance with the requirements of Mitigation Measure TR-1. Temporary nighttime closures of the southbound ramps between 10:00 PM and 6:00 AM during weekends for approximately 8-12 weeks are expected during the dismantling of falsework for the US-101 viaduct. To the extent Little Tokyo community members' businesses intend trucks to serve manufacturing and warehouse facilities during those late nights and early mornings, other street traffic would decrease at those times, so any trucks could more easily navigate those surface streets and maintain access to all Little Tokyo businesses. Temporary partial or full closures will also occur during the daytime. As discussed in Final EIS Section 3.3, Transportation and in Final EIS Chapter 9, Build Alternative Design Option, Mitigation Measure TR-1, requires coordination of closure schedules with contractors, Caltrans, and businesses to minimize traffic disruptions. No adverse effects related to traffic on Alameda Street or |

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| | | Los Angeles Street are anticipated. Additionally, there will be no adverse effects on access to religious institutions or businesses in the area during construction. Construction detours would not result in increased traffic that causes notable delays in Little Tokyo. Metro will coordinate temporary street closures and detour routes among the contractor, Caltrans, and private businesses, including businesses and facilities identified by Little Tokyo Business Improvement District, to minimize construction related traffic impacts during peak hours. |
| | **ORG 8-3** | Metro recognizes the Little Tokyo community as a vital and historic area, one of the last remaining Japan towns in the United States and values its collaborative relationship with the community. The Little Tokyo District is identified as a minority and low-income community in Final EIS Section 3.15, Page 3.15-5 (Socioeconomics and Communities Affected), Chapter 4.0, Pages 4-27 through 4-28, and on Final EIS Appendix D, Pages 138 through 142 and Figure 5-10. Additional details on the area's historic significance and evaluation criteria are provided in Final EIS Appendix M (Cultural Resource Reports).<br><br>While there are no identified residences in the portion of Little Tokyo that was considered in the community analysis, certain Census Tracts within its boundaries exceed the 79 percent minority population threshold, and minority-owned businesses are present. As such, the Final EIS includes a comprehensive evaluation of the entire Little Tokyo District as a minority and |

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| | low-income community, and the significance and unique needs are carefully considered throughout the Project analysis. |

environmental justice community with historic and cultural importance. At 140 years old, Little Tokyo is one of only three remaining historic Japantowns in the United States. ORG 8-3 Contd.

c) National Historic Landmark – The U.S. Department of Parks has registered the one-block long section on the north side of 1st Street between Central Avenue and Judge John Aiso Street as the Little Tokyo Historic District National Historic Landmark. ORG 8-4

d) Cultural/Religious Institutions – The Little Tokyo community extends north to the 101 Freeway and east to Center Street and is home to institutions such as Los Angeles Hompa Hongwanji Buddhist Temple, Nishi Child Development Center, Zenshuji Soto Mission, Hiroshima Kenjinkai, and St. Francis Xavier Japanese Catholic Chapel, the only Japanese American Catholic religious institution in north America. ORG 8-5

e) Legacy Businesses – Among the impacted businesses are the 101-year old Fukui Mortuary, Upper Crust Enterprises, and Cherry Land Company New warehouse that houses the Ichi Trading Company. ORG 8-6

Sincerely,

David Ikegami
President

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**ORG 8-4** The Little Tokyo Historic District National Historic Landmark between Central Avenue and Judge John Aiso Street is acknowledged and these facilities will be reflected in the Final EIS.

The Final EIS Chapter 4.5.3 has been revised as follows:

> Little Tokyo District - The western boundary of the community analysis study area south of US 101 was originally Alameda Street. A small portion of the City of Los Angeles' Little Tokyo Community Design Overlay District boundary (Little Tokyo District) overlaps with the Arts District and is located east of Alameda Street along 1st Street.
>
> The Little Tokyo District is one of three remaining official Japantowns in the United States. The Little Tokyo District includes a Historic District National Historic Landmark west of Alameda Street and was a designated California Cultural District. The Little Tokyo District is home to cultural institutions celebrating art and culture, as well as shopping, dining and religious destinations that serve both the local Japanese American community, visitors, and the broader Southern California community.

The Final EIS Section 3.15, Socioeconomic and Communities Affected, Figure 3.15-2, was also revised to include Hiroshima Kenjin-Kai of Southern California as #50, acknowledging the institution as a

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| | community facility within the socioeconomic planning area. The community facilities and public services figure is also included as Figure 5-5 of the Final EIS Appendix D, *Community Impact Assessment*. The Final EIS Appendix D, *Community Impact Assessment*, Table 5-1, has also been revised to acknowledge Hiroshima Kenjin-Kai of Southern California with the description as follows:<br><br>Hiroshima Kenjin-Kai of Southern California is a non-profit organization located at 712 1st Street. The organization promotes culture, traditions, and shares prefectural information through community and social engagement.<br><br>In the meeting held of February 20, 2025, the Little Tokyo Business Association/Little Tokyo Business Improvement District requested that the Japanese Evangelical Missionary Society be added to the Cultural/Religious Institutions map. The Final EIS Section 3.15, Socioeconomic and Communities Affected, Figure 3.15-2, was revised to include the Japanese Evangelical Missionary Society as #51, acknowledging the institution as a place of worship within the socioeconomic planning area. The community facilities and public services figure is also included as Figure 5-5 of the Final EIS Appendix D, *Community Impact Assessment*. The Final EIS Appendix D, *Community Impact Assessment*, Table 5-1, has also been revised to acknowledge the Japanese Evangelical Missionary Society with the description as follows: |

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| | The Japanese Evangelical Missionary Society is located at 948 E. 2nd Street and is a Christian, non-profit, para-church organization. |
| | **ORG 8-5** Except for Hiroshima Kenjinkai, the cultural and religious resources listed by the commenter were identified as community facilities and included in Draft EIS/SEIR Section 3.15, Socioeconomic and Communities Affected, Figure 3.15-2 and Chapter 4.0 as well in Draft EIS/SEIR Appendix D, *Community Impact Assessment*, Figure 5-5 and Table 5-1. As mentioned, Hiroshima Kenjin-Kai was added as a community facility to the Final EIS Section 3.15, Socioeconomic and Communities Affected, Figure 3.15-2 as well as in the Final EIS Appendix D, *Community Impact Assessment*, Figure 5-5.<br><br>The Final EIS Chapter 4.0, Section 4.6.1, Page 4-58 and Pages 210 and 211 of the Final EIS Appendix D, *Community Impact Assessment* has been revised as follows:<br><br>The area east of Alameda Street and north of 1st Street includes the Los Angeles Hompa Hongwanji Buddhist Temple (Nishi Betsuin) and Nishi Child Development Center on 1st Street, institutional uses, and surface parking lots. Zenshuji Soto Mission, Hiroshima Kenjikai, and St. Francis Xavier Japanese Catholic Church are located east of Alameda Street and south of 1st Street. Hompa Hongwanji Buddhist Temple is located closest to construction activities; |

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| | however, based on the analysis performed in Chapter 3.0 of this EIS/SEIR, the Little Tokyo District would not be subject to proximity impacts related to traffic, noise, loss of parking, or other construction or operations impacts even before mitigation measures are implemented.<br><br>Metro's review confirmed no construction or operation activities would occur near Hiroshima Kenjinkai that could disrupt its access, mission, or events. The Little Tokyo District would not be subject to proximity impacts related to traffic, noise, loss of parking, or other construction or operations impacts even before mitigation measures are implemented. Construction activities closest to the Little Tokyo District would take place multiple blocks away on Commercial Street and within existing railroad ROW along the west bank of the Los Angeles River. There are no construction haul routes that would travel through the Little Tokyo District. There would be no interruptions to traffic patterns or access restrictions to residences, businesses, and parking facilities within the Little Tokyo District. There would be no construction activities or construction traffic routing that would create physical or perceived barriers within the community, limit access to the Hompa Hongwanji Buddhist Temple or any other community or religious facilities or disrupt religious or cultural ceremonies. No adverse effect on the Los Angeles Hompa Hongwanji Buddhist Temple (Nishi Betsuin) or the Little Tokyo District would occur. |

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| | **ORG 8-6** As discussed in Draft EIS/SEIR Chapter 4.0, and illustrated on Figure 4-3, there are no construction haul routes that would impact access to Ichi Trading Corporation, Fukui Mortuary, or Upper Crust Enterprises. Construction would take place on Commercial Street and within the existing railroad right-of-way on the west bank of the Los Angeles River. There would be no impacts on parking or operations for any of these businesses. Therefore, Metro does not anticipate that the Project would impact these businesses or diminish their abilities to contribute to the Little Tokyo community. |

**Comment Number:** ORG 9

**Name:** Martha Jimenez, California Endowment

**Date Received:** 08/09/24

**Format Received:** Email

Dear Mr. Montez,

Attached please find The California Endowment's Comments on the Draft Environmental Impact Statement and Supplemental Environmental Impact Report for the Link Union Station Project, SCH No. 2016051071

Respectfully,

Martha Jimenez

**ORG 9 Martha Jimenez, California Endowment**




August 9, 2024

Carlos J. Montez
Deputy Executive Officer
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012
*By email*
Email: LinkUnionStation@metro.net

Re: Comments on the Draft Environmental Impact Statement and Supplemental Environmental Impact Report for the Link Union Station Project, SCH No. 2016051071

Dear Mr. Montez:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement and Supplemental Environmental Impact Report ("EIS/SEIR") for the Link Union Station Project ("the Project"). The purpose of the Project is to increase the regional and intercity rail service capacity of Los Angeles Union Station (LAUS) and to improve schedule reliability at LAUS through the implementation of a run through tracks configuration and elimination of the current stub end tracks configuration while preserving current levels of freight rail operations, accommodating the planned High Speed Rail (HSR) system in Southern California, increasing the passenger/pedestrian capacity and enhancing the safety of LAUS through the implementation of a new passenger concourse meeting the multi modal transportation demands at LAUS. The Project consists of infrastructure improvements in Downtown Los Angeles in the vicinity of LAUS. ORG 9-1

The California Endowment's offices are located adjacent to the Project, at 1000 Alameda Street. As a stakeholder that provides a variety of services to the community, we are writing to express our comments regarding the Project's impacts on the community as well as our current and future operations.

**Impacts to Future Development on the California Endowment Campus and Homeboy Industries**

The California Endowment is within the boundaries of the proposed Project area. (SEIR p. ES-xi.) The California Endowment is the process of developing the Robert K. Ross Center for Hope and Healing (Ross Center) on its campus, located at 1000 North Alameda St, which will provide 124 affordable housing units, as well as community services to the surrounding community. ORG 9-2

**ORG 9-1** Metro appreciates the comments provided on the Draft EIS/SEIR. Metro appreciates the opportunity to engage with stakeholders such as The California Endowment. Metro recognizes the importance of providing services to the community and values input regarding the potential impacts on both the community and operations.

Metro is committed to addressing the concerns raised as part of the ongoing environmental and community engagement efforts.

**ORG 9-2** The commenter states that the EIS/SEIR should be revised to address and mitigate impacts on future residents and employees of future housing units and designate both projects as sensitive receptors. At the time the analysis was performed, no sensitive receptors were located at 1000 North Alameda Street or across the street where the future Homeboy Industries project would be located. Reasonably foreseeable, indirect effects on future land uses that may be developed over time within the study area are accounted for in the impact analysis and cumulative effects analysis for all environmental topic areas under the indirect effects subsections of each topic area. Since the Ross Center is in the early phases of development with no confirmed construction date, it was not identified as a reasonably foreseeable future project and was therefore not considered in the cumulative effects analysis.




Additionally, Homeboy Industries is in the process of developing housing in the nearby vicinity, which will provide approximately 157 housing units. This project will be located across the street from the Ross Center.

The Project SEIR/EIS should be revised to address and mitigate the Project's impacts to future residents and employees of the Ross Center, as well as Homeboy Industries' planned development, and designate both projects as sensitive receptors. (CEQA Guidelines §15358 [reasonably foreseeable indirect effects]; Pub. Resources Code §21083(b)(3) [impacts on human beings].)

ORG 9-2 Contd.

**Aesthetics**

We request that mitigation measure AES-1 also include other surrounding residential properties, including the Ross Center.

ORG 9-3

AES-2 improperly defers mitigation of nighttime lighting impacts. AES-2 only requires avoiding nighttime construction activities near residential areas "to the extent feasible." (SEIR p. 7-39.) However, this measure lacks any specific performance criteria, which is required to support a deferral of mitigation. (*King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 857–858 [generalized goal is not performance standard].) AES-2 must be revised to include specific performance criteria and ensure impacts to surrounding communities are sufficiently mitigated.

ORG 9-4

**Noise**

NV-1 requires construction of a sound wall, but not until the Project reaches the forecasted maximum daily regional/intercity train movements through Union Station of 770 trains, projected in 2031. (SEIR, p. 7-147.) This mitigation measure is impermissibly deferred and delayed under CEQA. (*King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 860.) The SEIR claims that severe impacts will not accrue until 2031, but the Ross Center is currently scheduled to be operational before that time. Although the SEIR states that Metro may construct the sound wall at an earlier time, such discretion is impermissibly vague and lacks enforcement or objective criteria. (*Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 519–520.) We request that Metro install the sound wall as early as possible, prior to construction, to provide the greatest benefit to surrounding communities.

ORG 9-5

Moreover, health impacts resulting from noise, including sleep disturbance, are severe. Excessive sound level can have a profound health impact by disturbing sleep. Sleep disturbance is considered "the most deleterious non-auditory effect of environmental noise exposure . . . because undisturbed sleep of a sufficient length is needed for daytime alertness and performance, quality of life, and health." (Basner et al., *Auditory and Non-Auditory Effects of Noise on Health* (2014) 383 Lancet 1325, 1329.) Repeated sleep disturbance can change sleep structure, including "delayed sleep onset and early awakenings, reduced deep (slow-wave) and rapid eye movement sleep, and an increase in time spent awake and in superficial sleep stages." (*Id.* at

ORG 9-6

**ORG 9-3** Metro acknowledges the significance of both the Ross Center and Homeboy Industries' development efforts, and appreciates the identification of these future residential properties.

Regarding the Ross Center's location, it is in the general vicinity of the Link US Project but is not directly adjacent to or surrounding the Project area. The comment does not specify any Project-related visual impacts at the Ross Center that would require the application of Mitigation Measure AES-1 at that site. As the Ross Center is still in the early stages of development without a confirmed construction date, it is not considered a reasonably foreseeable future land use.

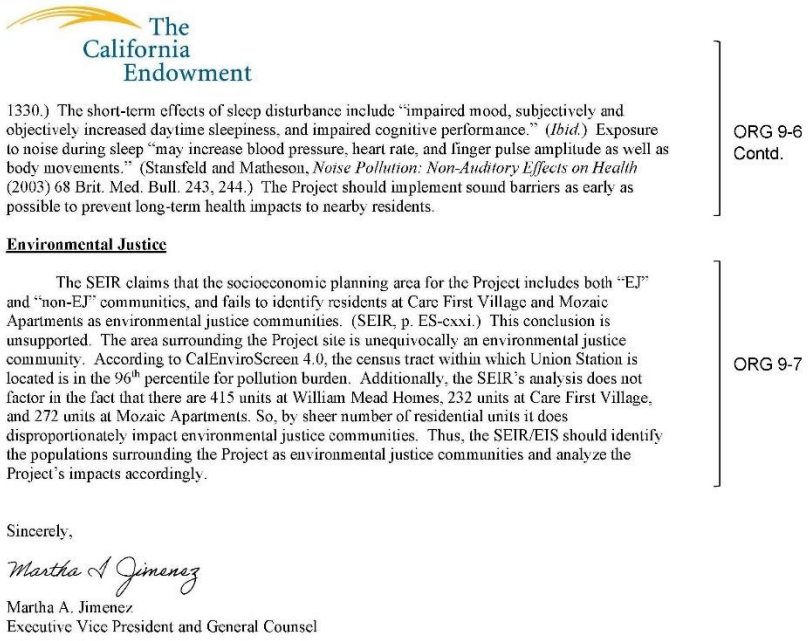
**ORG 9-4** As discussed in Draft EIS/SEIR Section 3.4 and Draft EIS/SEIR Chapter 9, temporary lighting used during nighttime construction activities would be placed in select locations where work is occurring and where these types of nighttime lighting sources already exist. Viewers would experience some change resulting from nighttime illumination; however, light levels would not be substantially different than under existing conditions where the urban environment is lit in the immediate vicinity of nighttime construction activities. Residential land uses would be the most sensitive to additional light and glare, and for this reason, impacts were identified for these sensitive land uses. Implementation of Mitigation Measure AES-2 would not defer mitigation of nighttime impacts but rather minimize the potential for

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| | | adverse effects. As part of the process to implement Mitigation Measure AES-2, temporary shields would serve to avoid or reduce light spill to residential areas. Thus, the Draft EIS/SEIR provides a reasonably complete discussion of this mitigation measure. |
| | **ORG 9-5** | Metro described the mitigation measure and provided an evaluation of its effectiveness by disclosing the range of sound levels for each noise sensitive receptor with mitigation in place (see Draft EIS/SEIR Chapter 3.6, Noise and Vibration, Table 3.16-4). As outlined in Mitigation Measure NV-1 of the Draft EIS/SEIR Section 3.6, Noise and Vibration, Metro may choose to construct the sound walls earlier, potentially as part of the first phase of work, depending on funding availability. The implementation timeframe is based on when the severe noise impact on existing sensitive receptors is anticipated to occur. This earlier construction may provide additional benefits beyond the initial evaluation of the mitigation measure. |
| | **ORG 9-6** | The issues raised, particularly regarding sleep disturbance and its documented health effects, underscore the importance of addressing noise impacts effectively and in a timely manner. The responses below address comments that relate to the impact analysis presented in the Draft EIS/SEIR, timing of sound wall construction, acknowledgement of health impacts of noise and sleep disturbance, and Metro's commitment to exploring opportunities to implement mitigation earlier than required. |

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| | Noise and Vibration Impacts in Draft EIS/SEIR - The Draft EIS/SEIR does disclose the severe noise impacts that would occur and includes mitigation to reduce impacts during construction and operation, as presented in Draft EIS/SEIR Appendix H, Tables 11.31 and 11.32. As discussed in Draft EIS/SEIR Chapter 3.6, Noise and Vibration, implementation of Mitigation Measures NV-2 and NV-3 would reduce construction-related adverse effects; however, some receptors would construction noise that would exceed applicable thresholds. After implementation of mitigation, temporary impacts would remain adverse.<br><br>Timing of Sound Wall Construction - Mitigation Measure NV-1, as outlined in the Draft EIS/SEIR, requires the construction of sound walls prior to reaching the forecasted 770 daily regional/intercity train movements through Union Station. This threshold was identified as the point at which severe noise impacts are anticipated. However, Metro recognizes that delaying the construction of sound walls until this threshold may not address interim noise concerns, especially for sensitive receptors like the Ross Center, which may become operational prior to 2031.<br><br>Mitigation Measure NV-1, Construct Sound Wall, was revised to include additional detail about the timing and maintenance of the sound walls at William Mead Homes. In addition, Metro also adopted a proposed Offsetting Mitigation Measure (OMM) to |

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| | complement existing construction mitigation measures to further limit impacts and be sensitive to community feedback related to William Mead Homes, a minority and low-income community with immediate proximity to construction.<br><br>Metro may elect to construct the sound walls earlier, depending on funding availability and Project priorities. While this flexibility allows Metro to act proactively, Metro acknowledges your concerns that this approach may lack sufficient enforceable criteria. In response, Metro will evaluate options to formalize criteria for early construction of sound walls and incorporate objective timelines where feasible to ensure noise mitigation aligns with community needs and Project milestones.<br><br>Health Impacts of Noise and Sleep Disturbance - Metro concurs with the scientific evidence cited regarding the serious health consequences of noise, including sleep disturbance, cardiovascular impacts, and cognitive effects. These findings reinforce the necessity of implementing noise mitigation measures promptly to safeguard the health and well-being of surrounding communities.<br><br>Commitment to Early Implementation - To address concerns raised, Metro will:<br><br>• Reassess the timeline for constructing sound walls and evaluate opportunities to advance their installation, prioritizing areas with sensitive receptors. |

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| | • Explore additional interim noise mitigation measures to minimize construction-related and early operational noise impacts on nearby communities.<br>• Incorporate enforceable criteria and timelines into the construction contract documents (plans and specifications) to provide greater clarity and accountability regarding noise mitigation efforts.<br><br>Metro appreciates the input received on this topic and will consider these recommendations as part of the Final EIS and final design stages of the Project. Ensuring the health and quality of life for communities surrounding the Project remains a top priority.<br><br>. |



The California Endowment

1330.) The short-term effects of sleep disturbance include "impaired mood, subjectively and objectively increased daytime sleepiness, and impaired cognitive performance." (*Ibid.*) Exposure to noise during sleep "may increase blood pressure, heart rate, and finger pulse amplitude as well as body movements." (Stansfeld and Matheson, *Noise Pollution: Non-Auditory Effects on Health* (2003) 68 Brit. Med. Bull. 243, 244.) The Project should implement sound barriers as early as possible to prevent long-term health impacts to nearby residents.

ORG 9-6 Contd.

**Environmental Justice**

The SEIR claims that the socioeconomic planning area for the Project includes both "EJ" and "non-EJ" communities, and fails to identify residents at Care First Village and Mozaic Apartments as environmental justice communities. (SEIR, p. ES-cxxi.) This conclusion is unsupported. The area surrounding the Project site is unequivocally an environmental justice community. According to CalEnviroScreen 4.0, the census tract within which Union Station is located is in the 96th percentile for pollution burden. Additionally, the SEIR's analysis does not factor in the fact that there are 415 units at William Mead Homes, 232 units at Care First Village, and 272 units at Mozaic Apartments. So, by sheer number of residential units it does disproportionately impact environmental justice communities. Thus, the SEIR/EIS should identify the populations surrounding the Project as environmental justice communities and analyze the Project's impacts accordingly.

ORG 9-7

Sincerely,

Martha A. Jimenez

Martha A. Jimenez
Executive Vice President and General Counsel

**ORG 9-7** The Project Study Area does indeed include neighborhoods that face high pollution burdens, as identified by CalEnviroScreen 4.0. Metro recognizes the importance of considering all communities that may be affected by the Project, including those living at Care First Village, Mozaic Apartments, and William Mead Homes, which contain significant numbers of residential units.

The socioeconomic planning area contains both minority and/or low-income communities and non-minority and/or low-income communities. Sensitive receptors at William Mead Homes (minority and low-income community), Care First Village (low-income community), and the Mozaic Apartments (non-minority or low-income community) would be subject to similar levels of noise construction impacts.

Final EIS Chapter 4.0, Section 4.3.3 describes the methodology used to determine the presence of minority, low-income, and non-minority communities in the community analysis study area. As described in Final EIS Chapter 4.0, Section 4.3.3:

- A census tract identified as having a minority community that is meaningfully greater than the community of comparison occurs when the percentage of minority individuals in a census tract is greater than 110 percent of the minority population in the City of Los Angeles, which is 79.1 percent.

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| | • A community is considered a low-income community when the median income is below 150 percent of the federal poverty level, which would be $39,750. The 2019 Metro Equity Platform identifies an EFC community if the household income is less than $60,000, which reflects incomes in the Los Angeles area.<br><br>Additional minority and/or low-income communities within, and adjacent to, the Project Study Area were also considered based on demographic characteristics, stakeholder interviews and desktop reviews. Reviews included newer developments that were not captured in 2020 Census Data, institutionalized populations, recognized community boundaries, and workers that travel through LAUS on a daily basis.<br><br>With exception of the error in the Final EIS Executive Summary noted by the commentor, First Care Village is correctly identified as a low-income community in the Final EIS analysis. As stated in Final EIS, Chapter 4.0, "Demographic census information was not available for the Care First Village, located in Census Tract 2060.20 adjacent to the railroad ROW north of LAUS; however, because the purpose of the complex is to provide interim housing to unsheltered individuals, it is considered a low-income community." Furthermore, it is identified as a low-income community in Final EIS Chapter 4.0, Figure 4-2.<br><br>Mozaic Apartments is correctly identified in the Final EIS as a non-minority and |

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| | non-low-income community because it does not meet the low income or minority thresholds identified in Final EIS Chapter 4.0, Section 4.3.3 and summarized above.<br><br>The community analysis evaluation factors in the number of residential units at William Mead Homes (minority and low-income community), Care First Village (low-income community), and Mozaic Apartments (non-minority and non-low-income community). Final EIS Chapter 4.0, provides a detailed evaluation of whether the effects of the Build Alternative would be borne predominantly by a minority and/or low-income community, or the effects of the Build Alternative would be appreciably more severe or greater in magnitude on a minority and/or low-income community than the effects on a non-minority and/or non-low-income community. All environmental topics were reviewed to identify those that would not result in adverse effects or would not result in adverse effects after mitigation, based on the analysis described in Draft EIS/SEIR Chapter 3.0, Affected Environment and Environmental Consequences. Topics that would result in adverse effects were further evaluated to determine if, and to what extent, these adverse effects would affect minority and/or low-income communities (i.e., have the potential to be disproportionate and predominately borne by minority and/or low-income communities). Draft EIS/SEIR, Chapter 4.0, Table 4-5 includes all topics considered and identifies which topics were eliminated from further community analysis |

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| | and which were retained and discussed further. |

**Comment Number:** ORG 10

**Name:** Bryan Ramos Fernandez, Los Angeles Unified School District

**Date Received:** 08/09/24

**Format Received:** Email

Carlos J. Montez,

Attached is LA Unified's comment on the Draft EIS/SEIR for the Link Union Station project. Feel free to contact the District's Office of Environmental Health and Safety if you have any questions.

Sincerely,

Bryan Ramos Fernandez, AICP

CEQA Project Manager

Contract Professional

Los Angeles Unified School District (LAUSD)

Office of Environmental Health and Safety (OEHS)

[redacted]

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**ORG 10 Bryan Ramos Fernandez, Los Angeles Unified School District**

# Los Angeles Unified School District

**Office of Environmental Health and Safety**

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August 9, 2024

Carlos J. Montez
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

PROJECT: Link Union Station DEIR/EIS, SCH #2016051071

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the Link Union Station Project. LAUSD is concerned about the potential negative impacts of the project on our students, staff, and parents and guardians of students attending the following schools in the Project Study Area. ORG 10-1

- Ann Street Elementary School, (76 K-5 students), 126 E. Bloom Street, Los Angeles, CA
- Vernon City Elementary School (139 K-5 students), 2360 E. Vernon Avenue, Vernon, CA

In addition, the District has two administrative sites at 611 E. Jackson Street and 312 N. Garey Street housing our Beyond the Bell programs for our students. All District sites are located within environmental justice communities as defined by State and Federal law.[1] [2]

The Project consists of transforming Los Angeles Union Station (LAUS) from a stub end tracks station into a run-through tracks station by extending ten platform tracks south of LAUS Platforms 2 through 6 to merge into a minimum of four tracks onto a viaduct over US-101 viaduct that would continue south to connect to mainline tracks along the west bank of the Los Angeles River, replacing the existing pedestrian passageway under the LAUS platforms and tracks with a new expanded passageway, and establishing 10 new run-through tracks for regional/intercity trains and future high-speed rail trains south of LAUS. The Project also includes off-site railroad improvements to BNSF Railway's Malabar Yard in the City of Vernon. The Malabar Yard railroad improvements consist of the closure of the 49th Street at-grade railroad crossing and a new track connection between two existing track segments along 46th Street in the City of Vernon. ORG 10-2

As described in the DEIR/EIS, the Project would result in significant and unavoidable impacts after the implementation of mitigation measures. These adverse impacts include construction emissions on air quality exceeding criteria pollutant threshold for PM10 and localized significance thresholds for PM10 and PM2.5; total emissions from construction activities of the Modified Proposed Project and Malabar Yard railroad improvements would exceed SCAQMD's daily criteria pollutant threshold for PM10; and at Vernon, potential roadway hazard due to queuing which may also impede access for emergency responders, increase response times, cause schedule delays to transit services, or disrupt pedestrian and bicycle access. This raises serious concerns about the potential damage to children's health and safety and impede access to our schools and sites. ORG 10-3

[1] https://experience.arcgis.com/experience/1c21c53da8de48f1b946f3402fbae55c/page/SB-535-Disadvantaged-Communities/
[2] https://gis.cnrb.arb.ca.gov/portal/apps/experiencebuilder/experience/?id=e746df40e30144029ed1f9fdf748c81b2

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*Our Mission: To ensure a safe and healthy environment for students to learn, teachers to teach, and employees to work.*
*Our Vision: To eliminate all environmental health and safety risks at schools.*

**ORG 10-1** Metro acknowledges the concerns raised by the Los Angeles Unified School District (LAUSD) regarding potential impacts of the Project on students, staff, and parents at Ann Street Elementary School, Vernon City Elementary School, and the District's administrative sites.

Further discussion of the localized air quality impacts at Malabar Yard is included in Response to Comment ORG 10-3. The responses below address the comments related to the Beyond the Bell facility located at 312 North Garey Street, consideration of minority and low-income communities in the Final EIS, and Metro's continued commitment to collaboration with LAUSD.

- Beyond the Bell (312 North Garey Street) - The Beyond the Bell facility located at 312 N. Garey Street is located within the Project study area; however, it was not identified as a school facility in the Draft EIS/SEIR. During preparation of the Final EIS and in response to the comments raised by LAUSD, further investigation into the activities that take place at this facility were performed to determine if the site is used as a school facility (before/after school program) or if it's used as an office (no children present). After contacting the LAUSD personnel at this specific location, it was confirmed that the building located at 312 N. Garey Street is used as an office with no programs or services offered there. No change is required to the Final EIS.

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| | • Minority and Low-Income Communities - Ann Street Elementary School and Vernon City Elementary School and their locations are within an minority and/or low-income community in Los Angeles and Vernon, respectively. As shown in Final EIS Chapter 4.0, Figure 4-1, the Beyond the Bell facilities located at 611 East Jackson Street and 312 North Garey Street are located in Census Tract 2060.52, which does not meet the low income or minority threshold to be determined as a minority, low-income, and non-minority communities (see Final EIS Chapter 4.0, Table 4-4). Although the Beyond the Bell facilities are not located within a minority and/or low-income community, they are located within the Project's community analysis study area. Please refer to Final EIS Chapter 4.0, and Appendix Q, Final Environmental Evaluation of Malabar Yard Mitigation, Section 3.16, for a full evaluation of potential effects on minority and/or low-income communities within the community analysis study areas considered in the cities of Los Angeles and Vernon, respectively.<br><br>The Final EIS includes measures to minimize potential impacts on minority and/or low-income communities and non-minority and non-low-income communities in the community analysis study areas. Mitigation measures related to noise, air quality, water quality, and hazardous materials are proposed to avoid and minimize |

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| | potential health impacts. Metro would implement the mitigation measures in the Final EIS and Appendix Q, Final Environmental Evaluation of Malabar Yard Mitigation, during construction and operation of the Build Alternative, Build Alternative Design Option, and Malabar Yard railroad improvements, respectively, to reduce potential effects.<br>• Collaboration Commitment - Metro will maintain ongoing communication with LAUSD to address concerns, provide updates, and ensure effective mitigation during all Project phases.<br><br>**ORG 10-2** The commentor is providing background of the major components of the Build Alternative considered in the Draft EIS/SEIR and Malabar Yard railroad improvements to provide context for its further comments. Project-related improvements are designed to enhance the regional transportation network, reduce bottlenecks, and accommodate increased passenger demand while maintaining safety and operational efficiency and maintaining freight railroad operations.<br><br>As discussed in Comment ORG 10-2 response, Metro remains committed to engaging with stakeholders and the community throughout the Project's development process.<br><br>**ORG 10-3** The responses below address the comments related to traffic and access to schools during construction and operation, air quality and health risk conducted to determine potential for impacts on sensitive receptors, public |

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| | safety, and life safety and emergency response.<br><br>• Traffic and Access to Schools During Construction and Operations – With regard to the Build Alternative/Build Alternative Design Option and Ann Street Elementary School, construction detours and closures will not significantly impede access to the school. As described in Draft EIS/SEIR Section 3.3, Transportation, under Topic 3.3-A (traffic delays that limit the effectiveness of the traffic circulation system) and Topic 3.3-C (emergency access), the traffic analysis for nearby streets, including Alameda Street and Los Angeles Street determined that no adverse effects would occur on these roadways during construction with the implementation of Mitigation Measure TR-1. No changes to traffic conditions on these roadways would cause long-term access restrictions during operation of the Build Alternative. These same conclusions apply for construction and operation of the Build Alternative Design Option.<br><br>With regard to the Malabar Yard railroad improvements and Vernon City Elementary School, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue – operations, and Fruitland |

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| | Avenue – operations); thereby causing a potential delay that would be considered an adverse effect (see Final EIS Appendix Q, Final Environmental Evaluation of Malabar Yard Mitigation Page 3.3-35 through 3.3-43). Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, the access to Vernon Elementary School would be maintained or enhanced during construction and operation of the Malabar Yard railroad improvements.<br><br>In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Draft EIS/SEIR. These measures are incorporated in the Final EIS as OMMs. OMM MY TR-7. High Visibility Crosswalk, Mid-Block Location would include installation of a high visibility crosswalk at Santa Fe Avenue near the Vernon City Elementary School and the Holy Angels Catholic Church of the Deaf. OMM MY TR-8. Intersection Crosswalk Improvements with Cool Street Paving would include installation of crosswalk improvements at the intersections of Santa Fe Avenue with 37th Street, 38th Street, Vernon Avenue, Pacific Boulevard, and Fruitland Avenue, and at the intersections of 46th Street with Pacific Boulevard and Seville Avenue. |

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| | Air Quality and Health Risk - The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from Los Angeles Junction. Daily train movements on the Harbor Subdivision (parallel to Santa Fe Avenue near Vernon City School) would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Key Issue Response #2, Table 2 and Figures 7 and 8). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent fewer train movements on the Harbor Subdivision (parallel to Santa Fe Avenue near Vernon City School). In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day). Fewer train movements on the Harbor Subdivision would improve citywide circulation and increase opportunities for enhanced community connectivity.<br><br>The Draft EIS/SEIR Section 3.5 and Final EIS Appendix G both discuss the potential impacts related to pollution (air quality, climate change, and health risk) associated with the Build Alternative and Malabar Yard railroad improvements combined. Final EIS Chapter 9 discusses the potential impacts |

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| | related to pollution (air quality, climate change, and health risk) associated with the Build Alternative Design Option and Malabar Yard railroad improvements combined.<br><br>A discussion of the Health Risk Assessment completed for the sensitive receptors, including the Ann Street Elementary School can be found on Draft EIS/SEIR Chapter 7, Supplemental EIR. Ann Street Elementary School is located approximately 785 feet away from LAUS. The HRA analyzes impacts out to a 2 km boundary and included Ann Street Elementary as a sensitive receptor in the HRA. As indicated in Draft EIS/SEIR Chapter 7, Table 7-31 criteria pollutants would not exceed SCAQMD thresholds during construction or operations and air quality impacts associated with the Malabar Yard railroad improvements would be less than significant. Regarding localized emissions, the Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. On-site construction emissions at Malabar Yard were compared to local screening thresholds from SCAQMD and were found to be below the thresholds for all criteria air pollutants (NOx, CO, $PM_{10}$, $PM_{2.5}$) (see Appendix F of Final EIS Appendix Q). This localized analysis used the nearest receptor which was 2415-2427 E 53rd St residences, located at a distance of 403.8 meters away. A HRA was not completed for the Malabar Yard railroad improvements since both construction and operational emissions for $PM_{10}$, a proxy for diesel particulate matter, were below the localized SCAQMD screening thresholds. Air quality |

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| | impacts to sensitive receptors further away from the emission source would be less likely to be impacted than those identified through the localized analysis. Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.<br><br>Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Final EIS Appendix Q Section 3.5, Section 3.5.4. In addition to the regional air quality benefits, from a localized perspective, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard.<br><br>The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of |

Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the 2023 Vernon Westside Zone Change and General Plan

Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to local vehicle idling associated with the Malabar Yard railroad improvements.

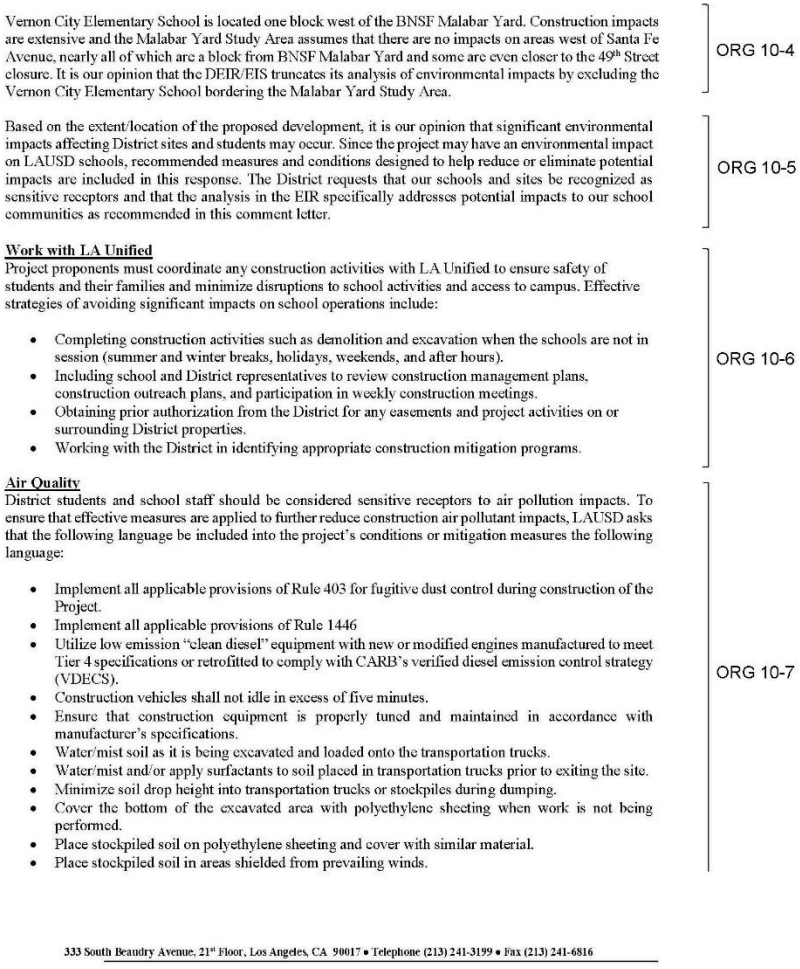
- Public Safety - The 46th Street Connector includes new railroad signals, flashers, gates, medians, curb line expansions, sidewalk/ramps, and driveway improvements at existing at-grade crossings on Pacific Boulevard, 46th Street, and Seville Avenue, as well as at the new at-grade crossing at Seville Avenue and 46th Street. Potential safety hazards associated with the new at-grade crossing at Seville Avenue and 46th Street are addressed in the Draft EIS/SEIR. Potential roadway safety devices that may be considered for future implementation (Malabar Yard Mitigation Measure TR-6) include queue cutter traffic signals or pre-signals for the new railroad crossing on Seville Avenue. These types of railroad safety improvements would enhance safety for commuters,

pedestrians, and school children that utilize these intersections and at-grade railroad crossings.

As discussed in Final EIS Appendix Q Section 3.14, Page 3.14-23, all Malabar Yard railroad improvements would be designed and constructed to comply with FRA and CPUC standards and specifications to maximize safety for both motorized and non-motorized forms of transportation.

- Life Safety and Emergency Response - Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, based on the extensive emergency response analysis performed in coordination with the City of Vernon, the sum of the worst-case daily delay for the affected train routes is 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Final EIS Volume III, Introduction, Table 3, the total delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction to total delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to

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| | response times for emergency service providers. |



Vernon City Elementary School is located one block west of the BNSF Malabar Yard. Construction impacts are extensive and the Malabar Yard Study Area assumes that there are no impacts on areas west of Santa Fe Avenue, nearly all of which are a block from BNSF Malabar Yard and some are even closer to the 49th Street closure. It is our opinion that the DEIR/EIS truncates its analysis of environmental impacts by excluding the Vernon City Elementary School bordering the Malabar Yard Study Area.

ORG 10-4

Based on the extent/location of the proposed development, it is our opinion that significant environmental impacts affecting District sites and students may occur. Since the project may have an environmental impact on LAUSD schools, recommended measures and conditions designed to help reduce or eliminate potential impacts are included in this response. The District requests that our schools and sites be recognized as sensitive receptors and that the analysis in the EIR specifically addresses potential impacts to our school communities as recommended in this comment letter.

ORG 10-5

**Work with LA Unified**

Project proponents must coordinate any construction activities with LA Unified to ensure safety of students and their families and minimize disruptions to school activities and access to campus. Effective strategies of avoiding significant impacts on school operations include:

- Completing construction activities such as demolition and excavation when the schools are not in session (summer and winter breaks, holidays, weekends, and after hours).
- Including school and District representatives to review construction management plans, construction outreach plans, and participation in weekly construction meetings.
- Obtaining prior authorization from the District for any easements and project activities on or surrounding District properties.
- Working with the District in identifying appropriate construction mitigation programs.

ORG 10-6

**Air Quality**

District students and school staff should be considered sensitive receptors to air pollution impacts. To ensure that effective measures are applied to further reduce construction air pollutant impacts, LAUSD asks that the following language be included into the project's conditions or mitigation measures the following language:

- Implement all applicable provisions of Rule 403 for fugitive dust control during construction of the Project.
- Implement all applicable provisions of Rule 1446
- Utilize low emission "clean diesel" equipment with new or modified engines manufactured to meet Tier 4 specifications or retrofitted to comply with CARB's verified diesel emission control strategy (VDECS).
- Construction vehicles shall not idle in excess of five minutes.
- Ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications.
- Water/mist soil as it is being excavated and loaded onto the transportation trucks.
- Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.
- Minimize soil drop height into transportation trucks or stockpiles during dumping.
- Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.
- Place stockpiled soil on polyethylene sheeting and cover with similar material.
- Place stockpiled soil in areas shielded from prevailing winds.

ORG 10-7

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**ORG 10-4** As presented in Draft EIS/SEIR Appendix Q, Draft Environmental Evaluation of Malabar Yard Mitigation, Section 3.5, the Vernon City Elementary School (referred to as Vernon City School) is included as one of the closest sensitive receptors to the 0.25-mile buffer from the Project footprint for the design options considered (see Draft EIS/SEIR Appendix Q, Draft Environmental Evaluation of Malabar Yard Mitigation, Section 3.5, Figure 3.5-1). Final EIS Appendix Q, Final Environmental Evaluation of Malabar Yard Mitigation, Section 3.5, Page 3.5-21 acknowledges implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place. This is because daily train movements on the Harbor Subdivision would be reduced from 4.0 existing daily train movements to 0.85 daily train movements (78 percent fewer trains) facilitating fewer train movement north of Malabar Yard. See Draft EIS/SEIR Appendix Q Section 1, Figure 1-2 for the location of the Harbor Subdivision. The Harbor Subdivision is also shown in Volume III, Introduction on Figure 7 and 8. As such, the Vernon City Elementary School was considered in the air quality analysis (refer to Key Issue Response #3 for a discussion related to the air quality analysis and freight rail activity near sensitive receptors performed for the Malabar Yard railroad improvements) with the analysis demonstrating there would be no direct adverse effects from the Malabar Yard rail improvements. As indicated in Draft

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| | EIS/SEIR Chapter 7, Table 7-28, criteria pollutants would not exceed SCAQMD thresholds during construction or operations. As a result, air quality impacts associated with the Malabar Yard railroad improvements would be less than significant within the study area (i.e., South Coast Air Basin). On-site construction emissions at Malabar Yard were compared to local screening thresholds from SCAQMD and were found to be below the thresholds for all criteria pollutants (NOx, CO, $PM_{10}$, $PM_{2.5}$) within the Project study area, as discussed in Appendix F of the Draft EIS/SEIR. As shown in Draft EIS/SEIR Appendix Q, Draft Environmental Evaluation of Malabar Yard Mitigation, Section 3.10, Figure 3.10-1, the nearest school, Vernon City Elementary School is located outside of the Malabar Yard study area and outside of the 0.25-mile buffer, which is the distance recommended to be used to determine potential for impacts related to hazardous waste and material in planning documents including the California Environmental Quality Act. The localized analysis for air quality at Malabar Yard used the nearest receptor which was 2415-2427 E 53rd St residences, located at a distance of 403.8 meters away. Air quality impacts to sensitive receptors further away or at a similar distance, such as the Vernon City Elementary School, from the emission source would be less likely to be impacted than those identified through the localized analysis. (see Appendix F of Final EIS Appendix Q)<br><br>Vernon City Elementary School was not included in the noise analysis as it falls |

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| | | outside of noise screening distance buffer of 0.25 mile, the FTA screening distance to identify noise sensitive receptors where transit projects may result in noise and vibration impacts. For additional information regarding noise impacts on the Vernon City Elementary School please refer to the Comment ORG 10-10 response. |
| | **ORG 10-5** | Please refer to the Comment ORG 10-3 and Comment ORG 10-4 responses, as well as Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements.<br><br>The commenter states that LAUSD's administrative sites (Beyond the Bell facilities located at 611 Jackson Street and 312 North Garey Street) should be considered sensitive receptors. The Beyond the Bell facility located at 611 Jackson Street is identified in the Draft EIS/SEIR as an air quality sensitive receptor because it is a school facility. Refer to Final EIS Section 3.5, Air Quality and Global Climate Change, Figure 3.5-1. However, the Beyond the Bell facility located at 312 North Garey Street is not identified as an air quality sensitive receptor in the Final EIS because it does not function as a school but rather an administrative office for LAUSD employees. Offices are not included in the definition of a sensitive receptor because employees do not typically remain onsite for a full 24 hours, but are present for shorter periods of time, such as eight hours. |

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| | Both Beyond the Bell facilities were not included in the noise analysis as they fall outside of the noise screening distances utilized to determine where transit projects may result in noise and vibration impacts. |
| | **ORG 10-6** The Final EIS Executive Summary, Section 3.3, Transportation and Final SEIR have been revised to include LAUSD in planning efforts in Mitigation Measure TR-1 as follows:<br><br>The street closure schedules in the construction TMP shall be coordinated among the construction contractor, LADOT, Caltrans (if ramps are involved), private businesses, public transit and bus operators, emergency service providers, Los Angeles Unified School District, and residents to minimize construction-related vehicular traffic impacts during the peak-hour.<br><br>In addition, the Final EIS Appendix Q (Final Environmental Evaluation of Malabar Yard Mitigation) Executive Summary, Section 3.3 (Transportation), and Final SEIR have been revised to include LAUSD in planning efforts in Malabar Yard Mitigation Measure TR-1 as follows:<br><br>Any identified street closure schedules in the construction TMP shall be approved by the City of Vernon and coordinated among the construction contractor, Metro, BNSF, private businesses, public transit and bus operators, the bicycle community, Los Angeles Unified School District, and emergency service providers |

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| | to minimize construction-related vehicular and non-vehicular traffic impacts during the peak hour.<br><br>Metro values LAUSD's input and will maintain open lines of communication throughout the Project to prioritize the safety and well-being of students and their families.<br><br>To address the four recommended strategies to avoid significant impacts on school operations provided by the commenter, the following responses are provided below:<br><br>• While Metro recognizes the value of limiting construction activities to non-school periods, such as summer and winter breaks, weekends, and after-hours, this approach is not feasible for maintaining the Project timeline. However, Metro is committed to scheduling work to minimize disruptions as much as possible in accordance with the City of Vernon's Municipal Code for construction timing.<br><br>• LAUSD representatives will be invited to review construction management and outreach plans and participate in regular coordination meetings to address potential issues proactively.<br><br>• No construction activities are planned on LAUSD properties, and no easements are required. However, Metro will coordinate closely with LAUSD regarding any unanticipated activities that might affect LAUSD properties. |

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| | • Metro is committed to working with LAUSD to implement the applicable mitigation measures in the Final EIS (with revisions per LAUSD feedback) to minimize construction-related impacts.<br><br>In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Draft EIS/SEIR. These measures are incorporated in the Final EIS as Offsetting Mitigation Measures (OMMs). The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned.<br><br>**ORG 10-7** Please refer to Comment ORG 10-3 and Comment ORG 10-4 responses related to consideration of sensitive receptors.<br><br>To address the eleven recommendations provided by the commenter, the following responses are provided below:<br><br>• In compliance with SCAQMD Rule 403, Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 specify |

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| | the additional dust preventative measures and procedures that shall be implemented during Project construction activities. As shown in Draft EIS/SEIR Section 3.5, Air Quality and Global Climate Change, Table 3.5-6, the construction emission levels for the Build Alternative and Malabar Yard railroad improvements would be below the U.S. Environmental Protection Agency *de minimis* level with implementation of mitigation. The Project construction activities would be conducted in compliance with SCAQMD, the local air agency, regulations including Rule 403. The purpose of Rule 403 is to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (man-made) fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions. Although Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 may not include all items provided by the commenter, compliance with Rule 403 would require the contractor to reduce fugitive dust emissions and protect the health of sensitive receptors.<br>• While the commenter mentioned Rule 1446, there is no such rule under SCAQMD; however, Rule 1466, addressing particulate emissions from soils with toxic air contaminants, will be adhered to. Metro is required to comply with all applicable rules and regulations under the SCAQMD jurisdiction. |

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| | • Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 include language to follow preventative measures pursuant to SCAQMD Rule 403 including utilizing existing power sources (e.g., power poles) or clean fuel generators when feasible. In addition, Mitigation Measure AQ-2 and Malabar Yard Mitigation Measure AQ-2, requires cleaner equipment be used and all construction equipment be properly maintained.<br>• Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 include language to minimize idling time to 5 minutes whenever feasible.<br>• Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 include language to ensure that all construction equipment is properly tuned and maintained.<br>• Mitigation AQ-1 and Malabar Yard Mitigation Measure AQ-1 states that during clearing, grading, earthmoving, or excavation operations, fugitive dust emissions shall be controlled by regular watering. Additional language is also included to provide an operational water truck on-site at all times to minimize dust and ensure that watering occurs at least twice daily with complete coverage.<br>• Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 include language to ensure that when hauling |

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| | materials on- or off-site, trucks will be securing covered.<br>• For bulleted items 8 through 10 provided by the commenter, although Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 may not include all items provided by the commenter, compliance with Rule 403 would require the contractor to reduce fugitive dust emissions and protect the health of sensitive receptors. However, Project compliance with Rule 403 is further enforced in Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 by including idling, stockpiling, and water suppression use. Additionally, the surface of dirt piles shall be stabilized if not removed immediately.<br>• Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 include language to sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.<br>• Although Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 does not include language to install wheel washers or steel shaker plates, language is included therein to revegetate or stabilize disturbed land, including vehicular paths created during construction.<br>• Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 include language to suspend grading and earthmoving when wind gusts exceed |

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| | 25 miles per hour unless the soil is wet enough to prevent dust plumes.<br>• As stated in Draft EIS/SEIR Section 3.10, Hazardous Waste and Materials, Mitigation Measures HAZ-1 through HAZ-8 would be implemented to minimize direct adverse effects resulting from the accidental release of hazardous materials into the environment prior to and during construction of the Build Alternative. These mitigation measures would also be applicable to the Build Alternative Design Option. With regards to the Malabar Yard railroad improvements, as stated in Final EIS Appendix Q, Draft Environmental Evaluation of Malabar Yard Mitigation, Section 3.10, Pages 3.10-19 through 3.10-21, Malabar Yard Mitigation Measures HAZ-1 through HAZ-6 would be implemented to minimize direct adverse effects resulting from the accidental release of hazardous materials into the environment prior to and during construction. Therefore, no further mitigation is necessary to reduce construction air pollutant impacts. |

- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers).
- Install wheel washers (or steel shaker plates) where vehicles enter and exit unpaved roads onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).
- Excavation and transportation of soil known to contain hazardous substances should be limited to periods when school is not in session.

ORG 10-7 Contd.

*CERP*

As required by the CEQA Guidelines, the Draft EIR must evaluate the Project's impacts that conflict with or obstruct implementation of the applicable air quality plan, which includes the East Los Angeles, Boyle Heights, West Commerce (ELABHWC) Community Emissions Reduction Plan (CERP). The CERP identifies reducing exposure to air pollution at schools, childcare centers, and homes as one of the plan's six priorities. The Draft EIR should provide adequate evaluation air quality impacts by evaluating the Project's conformity and consistency with the CERP and its implementation of reducing exposure to air pollution at schools.[3]

ORG 10-8

**Hazards and Hazardous Materials**

The Project has the potential to transport hazards and hazardous materials during construction and operation. The following language is recommended for potential impacts related to hazards and hazardous materials:

- During construction, ingress/egress routes to the construction site should be designed to ensure that trucks and construction vehicles carrying hazards and hazardous materials are routed away from District school sites. Additional recommendations are provided in this letter under the Transportation/Traffic section.

ORG 10-9

**Noise and Vibration**

Noise and vibration created by construction and operation activities may impact District schools that are adjacent to the Project corridor. CEQA requires that such impacts be quantified and eliminated or reduced to a level of insignificance. LAUSD established maximum allowable noise levels to protect students and staff from noise impacts generated in terms of Leq. These standards were established based on regulations set forth by the California Department of Transportation. LAUSD's exterior noise standard is 67 dBA Leq and the interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA of pre-project ambient level. To ensure that effective measures are employed to reduce construction related noise impacts on the campus, LAUSD asks that the following language be included into the project's conditions or mitigation measures the following language:

- Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when noise impacts to the schools exceed the District's noise standards.
- All pile driving equipment shall be equipped with noise control devices and/or shall implement noise buffers with minimum quieting factor of 10dBA, to the extent feasible. If possible, drilled piles are preferred to driven piles.
- Demolition activities shall be scheduled for when school is not in session.

ORG 10-10

3 WCWLB CERP (2019), https://www.aqmd.gov/docs/default-source/nb-617-ab-134/steering-committees/east-la/cerp/cnrb-submittal/final-cerp.pdf?sfvrsn=8

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**ORG 10-8** The Final EIS Section 3.5, Air Quality and Global Climate Change, Table 3.5-1 has been revised to include a description of Assembly Bill 617 and the Community Emission Reduction Plan (CERP) as follows:

AB 617 was signed into law by Governor Edmund G. Brown Jr. in 2017 to address air pollution impacts in communities with high cumulative exposure burdens. AB 617 requires the California Air Resources Board (CARB) to develop a Statewide Strategy to reduce emissions of toxic air contaminants and criteria air pollutants in communities most impacted by air pollution. A small portion of the Project is within the east side of the East Los Angeles, Boyle Heights, and West Commerce (ELABHWC) community.

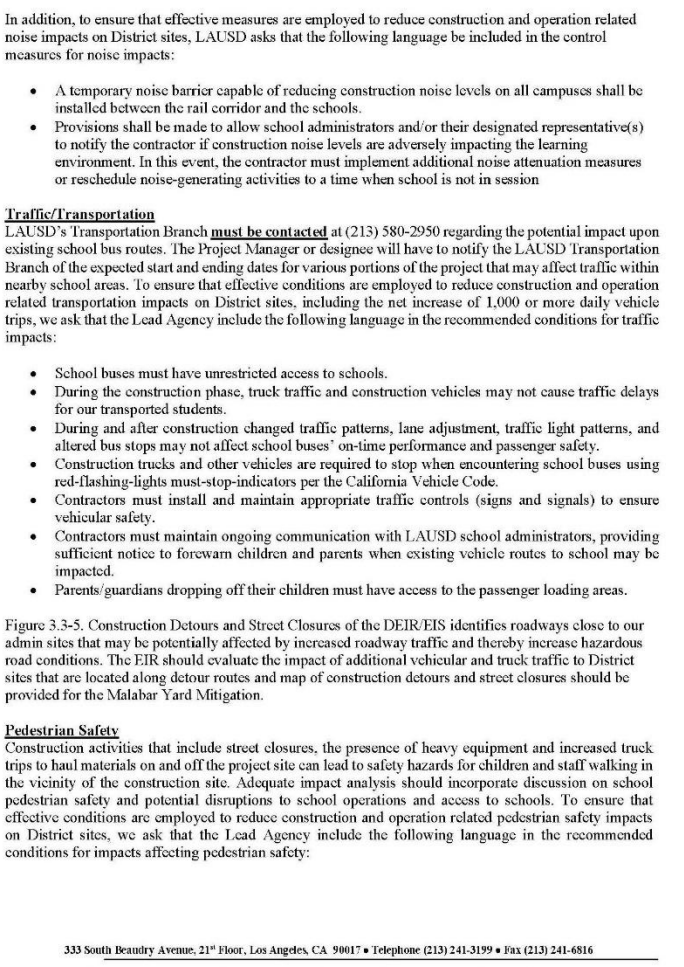
AB 617 requires the CARB Governing Board, in consultation with specified partners, to annually consider the selection of communities for the preparation of a Community Emissions Reduction Program (CERP). The CERP identifies actions set by the Community Steering Committee (CSC), the South Coast Air Quality Management District (SCAQMD), and CARB to reduce exposure to criteria air pollutants and toxic air contaminants in a priority community. The CERP acknowledges the federal, State, and local agencies already have air quality regulations in place to reduce air pollution from sources such as trucks, industrial facilities, off-road equipment, etc. The CERPs call for

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| | actions and goals to be implemented through six types of strategies including: rules and regulations, enforcement, air monitoring, collaboration, incentives, and public information and outreach. The ELABHWC community identifies reducing railroad emissions as a priority.<br><br>As outlined in Draft EIS/SEIR Section 3.5, Air Quality and Global Climate Change, Mitigation Measure AQ-3 mandates the use of emerging technologies, such as electric or alternative fuel options, to reduce CO, $NO_x$, ROG, $PM_{10}$, and $PM_{2.5}$ emissions. This mitigation measure also requires the development and implementation of an adaptive air quality mitigation plan that aligns with the 2018 California State Rail Plan (Caltrans 2018a), ensuring the gradual replacement of the rail fleet with zero- or low-emission locomotives. The flexible nature of Mitigation Measure AQ-3 allows for a variety of emission reduction strategies to ensure operational emissions stay below SCAQMD thresholds. Mitigation Measure AQ-3 would apply to both the Build Alternative and the Build Alternative Design Option.<br><br>Moreover, the Build Alternative and Build Alternative Design Option has the potential to promote a shift toward greater transit use, reducing reliance on single-occupancy vehicles as regional mobility improves. This shift would likely result in lower transportation emissions, as rail is a more efficient mode of travel, reducing road congestion and delays. With a growing population and increased density in downtown Los Angeles, the |

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| | | Project is expected to contribute to lower per capita emissions from both buildings and transportation, aligning with sustainable growth objectives. As such, the Build Alternative and Build Alternative Design Option would support the implementation of the East Los Angeles, Boyle Heights, West Commerce Community Emissions Reduction Plan. |
| | **ORG 10-9** | As stated in Draft EIS/SEIR Section 3.10, Hazardous Waste and Materials, Mitigation Measure HAZ-1 requires the implementation of a Construction Hazardous Materials Management Plan (HMMP), which will outline safe transport, storage, containment, and disposal procedures for chemicals and hazardous materials used or exposed during construction of the Build Alternative. This plan will also specify appropriate disposal locations. Additionally, the fourth bullet of Mitigation Measure AQ-1 mandates that trucks be covered when hauling materials off-site (see Final EIS Section 3.5, Air Quality and Global Climate Change). This mitigation also applies to the Build Alternative Design Option.<br><br>As noted in Draft EIS/SEIR Appendix Q, Draft Environmental Evaluation of Malabar Yard Mitigation, Section 3.10, the volume of hazardous materials and wastes to be transported, used, or disposed of during operations will not significantly differ from existing conditions in the Malabar Yard Study Area or surrounding community, which is already industrialized. BNSF facilities in operation will continue to provide safe storage, containment, and disposal areas for |

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| | | chemicals and hazardous materials, in compliance with regulations governing their safe handling and disposal. Malabar Yard Mitigation Measure HAZ-1 requires the implementation of a Construction HMMP during construction. Additionally, the fourth bullet of Malabar Yard Mitigation Measure AQ-1 mandates that trucks be covered when hauling materials off-site (see Final EIS Appendix Q, Final Environmental Evaluation of Malabar Yard Mitigation, Section 3.5, Page 3.5-23).<br><br>As discussed in the Comment ORG 10-6 response, Metro will coordinate with LAUSD during the preparation and/or implementation of the construction Traffic Management Plan (TMP). The TMP will identify construction traffic routes, including haul truck routes, and preferred delivery/haul-out locations and hours. |
| | **ORG 10-10** | The Federal Transit Administration (FTA) defines screening distances to identify noise-sensitive receptors that may be affected by noise and vibration impacts from transit projects. As shown in Draft EIS/SEIR Appendix Q, Draft Environmental Evaluation of Malabar Yard Mitigation, Section 3.6, Figure 3.6-1, Vernon City School is located outside of the FTA screening distances considered in the evaluation. As a result, no adverse noise or vibration impacts are anticipated from the Malabar Yard railroad improvements, and LAUSD's maximum allowable noise level of 67 dBA (exterior) will not be exceeded. |

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| | Since no noise or vibration mitigation is required for the Malabar Yard railroad improvements, the proposed mitigation measure requested by the commenter is not warranted based on the results of the evaluation.<br><br>Ann Street Elementary School and the two administrative sites are also located outside of the applicable FTA screening distances (Draft EIS/SEIR Section 3.6, Noise and Vibrations, Figure 3.6-4). Noise and vibration impacts at Ann Street Elementary were disclosed in Draft EIS/SEIR Section 3.6, Noise and Vibration, and Appendix H, Draft Noise and Vibration Study. As outlined in Final EIS Section 3.6, Noise and Vibration, no moderate or severe noise impacts would occur at Ann Street Elementary during operations (Final EIS Section 3.6, Noise and Vibration, Pages 3.6-39 and 3.6-59).<br><br>Final EIS Section 3.6, Noise and Vibration, Figure 3.6-12 on Page 3.6-37 shows the land uses that may be subject to significant construction noise. Ann Street Elementary is not expected to experience severe noise impacts during construction. |



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

- A temporary noise barrier capable of reducing construction noise levels on all campuses shall be installed between the rail corridor and the schools.
- Provisions shall be made to allow school administrators and/or their designated representative(s) to notify the contractor if construction noise levels are adversely impacting the learning environment. In this event, the contractor must implement additional noise attenuation measures or reschedule noise-generating activities to a time when school is not in session

ORG 10-10 Contd.

**Traffic/Transportation**
LAUSD's Transportation Branch **must be contacted** at (213) 580-2950 regarding the potential impact upon existing school bus routes. The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas. To ensure that effective conditions are employed to reduce construction and operation related transportation impacts on District sites, including the net increase of 1,000 or more daily vehicle trips, we ask that the Lead Agency include the following language in the recommended conditions for traffic impacts:

- School buses must have unrestricted access to schools.
- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.
- During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.
- Parents/guardians dropping off their children must have access to the passenger loading areas.

ORG 10-11

Figure 3.3-5. Construction Detours and Street Closures of the DEIR/EIS identifies roadways close to our admin sites that may be potentially affected by increased roadway traffic and thereby increase hazardous road conditions. The EIR should evaluate the impact of additional vehicular and truck traffic to District sites that are located along detour routes and map of construction detours and street closures should be provided for the Malabar Yard Mitigation.

**Pedestrian Safety**
Construction activities that include street closures, the presence of heavy equipment and increased truck trips to haul materials on and off the project site can lead to safety hazards for children and staff walking in the vicinity of the construction site. Adequate impact analysis should incorporate discussion on school pedestrian safety and potential disruptions to school operations and access to schools. To ensure that effective conditions are employed to reduce construction and operation related pedestrian safety impacts on District sites, we ask that the Lead Agency include the following language in the recommended conditions for impacts affecting pedestrian safety:

ORG 10-12

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**ORG 10-11** Please refer to Comment ORG 10-3 response that includes details of the traffic/transportation effects and mitigation measures to reduce access impacts to LAUSD schools and facilities. As discussed in that response, the Build Alternative, the Build Alternative Design Option, or Malabar Yard railroad improvements would not cause impacts related to traffic delay that would impede access to LAUSD schools or facilities during construction or operation.

Potential roadway hazards during construction are disclosed in Final EIS Section 3.3 for the Build Alternative and Appendix Q, Final Environmental Evaluation of Malabar Yard Mitigation, Section 3.3 and Final EIS Chapter 9 for the Build Alternative Design Option.

As discussed in the Comment ORG 10-6 response, Metro will coordinate with LAUSD during the preparation and/or implementation of the construction Traffic Management Plan (TMP). The TMP will address temporary road/pedestrian closures; traffic/light patterns; traffic controls (signs and signals); proposed haul routes; staging of construction equipment; and security such as barriers and fencing. Extensive coordination with the local public agencies, including LAUSD, will be conducted during the TMP development process and measures will be included in the TMP to address the impacts to local roads.

The Final EIS Executive Summary, Section 3.3, Transportation, and Final SEIR, have

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| | been revised to include LAUSD in planning efforts in Mitigation Measure TR-1 as follows:<br><br>The street closure schedules in the construction TMP shall be coordinated among the construction contractor, LADOT, Caltrans (if ramps are involved), private businesses, public transit and bus operators, emergency service providers, Los Angeles Unified School District, and residents to minimize construction-related vehicular traffic impacts during the peak-hour.<br><br>The Final EIS Appendix Q (Final Environmental Evaluation of Malabar Yard Mitigation), Executive Summary, Final SEIR have been revised to include LAUSD in planning efforts in Malabar Yard Mitigation Measure TR-1 as follows:<br><br>Any identified street closure schedules in the construction TMP shall be approved by the City of Vernon and coordinated among the construction contractor, Metro, BNSF, private businesses, public transit and bus operators, the bicycle community, Los Angeles Unified School District, and emergency service providers to minimize construction-related vehicular and non-vehicular traffic impacts during the peak hour.<br><br>**ORG 10-12** As stated in Draft EIS/SEIR Section 3.3, Transportation, appropriate safety provisions would be required to be in place to minimize disruptions to pedestrian ingress and egress through LAUS. This includes sequencing construction within the rail yard (and |

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| | passenger concourse) and maintaining safe and accessible access to platforms for the Gold Line and regional/intercity trains. Pedestrian and bicycle access to and from LAUS would also be temporarily affected, and bicyclists could be subject to hazardous conditions near work zones during the construction of bridge improvements (e.g., Cesar Chavez Avenue) and modifications to local streets (including potential street closures and vacations). These impacts would be mitigated with implementation of Mitigation Measure TR-1 (described above under the Comment ORG 10-3 and Comment ORG 10-11 responses). As stated in the Comment ORG-11 response, the TMP will address temporary road/pedestrian closures; traffic/light patterns; traffic controls (signs and signals); proposed haul routes; staging of construction equipment; and security such as barriers and fencing. Extensive coordination with the local public agencies, including LAUSD, will be conducted during the TMP development process and measures will be included in the TMP to address the impacts to local roads.<br><br>During operations, a number of streets would be reconstructed or modified. These streets include Center Street, Commercial Street, Vignes Street, and Cesar Chavez Avenue. These streets are not near the Ann Street School area. However, south of LAUS in the vicinity of the Beyond the Bell facilities, Mitigation Measure LU-1 (described in Draft EIS/SEIR Section 3.2, Land Use and Planning) is proposed to improve connectivity between LAUS and neighborhoods surrounding LAUS and |

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| | facilitate cycling and walking the in the Project study area. Implementation of Mitigation Measure LU-1 would improve bicycle and pedestrian connectivity between LAUS and neighborhoods surrounding LAUS; thereby enhancing non-motorized access to LAUS for LAUSD students and employees.<br><br>During construction of the Malabar Yard railroad improvements and implementation of the construction TMP required by Malabar Yard Mitigation Measure TR-1 (as described in Draft EIS/SEIR Appendix Q, Draft Environmental Evaluation of Malabar Yard Mitigation, Section 3.3), specific measures would be in place to maintain safety for pedestrians, bicyclists, emergency responders, motorists, and construction workers throughout construction. As part of the TMP, proposed closure schedules and detour routes, as well as construction traffic routes, including haul truck routes, and preferred delivery/haul-out locations and hours would be identified. Pedestrian and bicycle detours would be provided as needed, to provide a physical separation from construction activities with adequate signage to maintain safety on affected roadways. When a crosswalk is closed due to construction activities, pedestrians would be directed to nearby alternate crosswalks. Depending on the construction activity and the construction sequencing, temporary barricades and fencing may be provided to prevent pedestrian, bicycle, and vehicle circulation hazards. |

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| | In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Draft EIS/SEIR. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis. |

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to school may be impacted.
- Contractors must maintain safe and convenient pedestrian routes to all nearby schools.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes are not to pass by ***any*** school, except when school is ***not*** in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards and flaggers at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

ORG 10-12 Contd.

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be addressed to ensure the welfare of the students attending schools, their teachers and staff, as well as to inform parents and guardians of these students.

Thank you for your attention to this matter. If you need additional information, please contact me at (213) 241-4210 or at cp-bryan.fernandez@lausd.net.

ORG 10-13

Sincerely,

Bryan Ramos Fernandez, AICP
CEQA Project Manager
Los Angeles Unified School District (LAUSD)
Office of Environmental Health and Safety (OEHS)
333 S Beaudry Ave., 21st Floor, Los Angeles, CA 90017

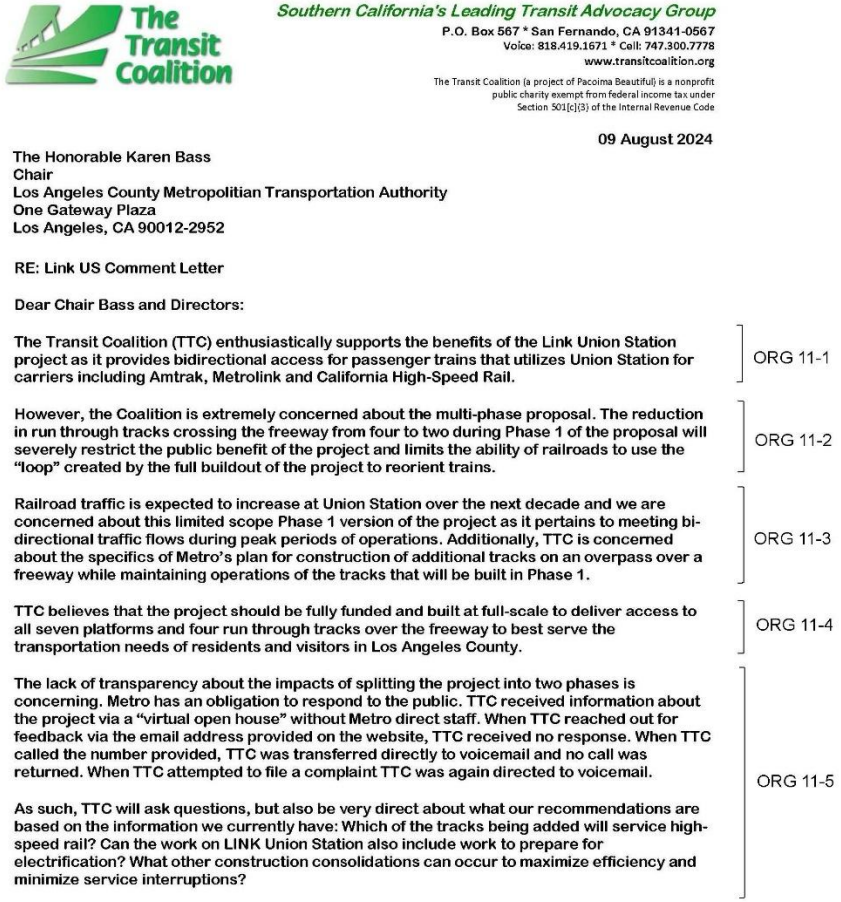
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

*Our Mission: To ensure a safe and healthy environment for students to learn, teachers to teach, and employees to work.*
*Our Vision: To eliminate all environmental health and safety risks at schools.*

**ORG 10-13** Metro appreciates the comments provided by LAUSD and recognizes the importance of protecting the health, safety, and welfare of LAUSD's students, staff, and the broader school community. The Draft EIS/SEIR includes a comprehensive evaluation of potential environmental impacts related to the Project, including those that could affect nearby schools, including Ann Street Elementary School Vernon City School, and Beyond the Bell facilities.

Further coordination with LAUSD will be prioritized throughout the construction process to ensure that any impacts on school activities are mitigated, and that parents, guardians, and the school community are kept informed. Metro is committed to minimizing any adverse effects to maintain a safe and conducive learning environment.

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| **Comment Number:** ORG 11<br>**Name:** Bart Reed, The Transit Coalition<br>**Date Received:** 08/09/24<br>**Format Received:** Online Comment Form | **ORG 11 Bart Reed, The Transit Coalition** |



The Transit Coalition

*Southern California's Leading Transit Advocacy Group*

P.O. Box 567 * San Fernando, CA 91341-0567
Voice: 818.419.1671 * Cell: 747.300.7778
www.transitcoalition.org

The Transit Coalition (a project of Pacoima Beautiful) is a nonprofit public charity exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code

09 August 2024

The Honorable Karen Bass
Chair
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

RE: Link US Comment Letter

Dear Chair Bass and Directors:

The Transit Coalition (TTC) enthusiastically supports the benefits of the Link Union Station project as it provides bidirectional access for passenger trains that utilizes Union Station for carriers including Amtrak, Metrolink and California High-Speed Rail. — ORG 11-1

However, the Coalition is extremely concerned about the multi-phase proposal. The reduction in run through tracks crossing the freeway from four to two during Phase 1 of the proposal will severely restrict the public benefit of the project and limits the ability of railroads to use the "loop" created by the full buildout of the project to reorient trains. — ORG 11-2

Railroad traffic is expected to increase at Union Station over the next decade and we are concerned about this limited scope Phase 1 version of the project as it pertains to meeting bi-directional traffic flows during peak periods of operations. Additionally, TTC is concerned about the specifics of Metro's plan for construction of additional tracks on an overpass over a freeway while maintaining operations of the tracks that will be built in Phase 1. — ORG 11-3

TTC believes that the project should be fully funded and built at full-scale to deliver access to all seven platforms and four run through tracks over the freeway to best serve the transportation needs of residents and visitors in Los Angeles County. — ORG 11-4

The lack of transparency about the impacts of splitting the project into two phases is concerning. Metro has an obligation to respond to the public. TTC received information about the project via a "virtual open house" without Metro direct staff. When TTC reached out for feedback via the email address provided on the website, TTC received no response. When TTC called the number provided, TTC was transferred directly to voicemail and no call was returned. When TTC attempted to file a complaint TTC was again directed to voicemail.

As such, TTC will ask questions, but also be very direct about what our recommendations are based on the information we currently have: Which of the tracks being added will service high-speed rail? Can the work on LINK Union Station also include work to prepare for electrification? What other construction consolidations can occur to maximize efficiency and minimize service interruptions? — ORG 11-5

**ORG 11-1** Metro appreciates the supportive comments on the Link Union Station Project and The Transit Coalition's (TTC) recognition of the benefits the Project brings, particularly in enhancing bidirectional access for passenger trains and improving connectivity for Amtrak, Metrolink, and California High-Speed Rail.

The Project is a key initiative to improve transit operations and efficiency, and TTC's support strengthens Metro's efforts to provide a modernized and integrated transportation hub that will serve the region's growing mobility needs. Metro is committed to ensuring the successful implementation of the Project and its positive impacts on transit access and the overall transit network.

**ORG 11-2** Metro assumes the commenter's mention of "Phase 1" is referring to the interim condition. Based on these proposed improvements planned to occur as part of the interim condition, multiple benefits would be realized including increased train movements through LAUS for regional/intercity trains.

The commenter's concern for removal of the loop track from the Link US Project design is noted. As presented in the Draft EIS/SEIR Section 2.0, Alternatives and Design Options Considered, Table 2-1, a total of 14 track alignment alternatives were screened, including 13 with single or double loop tracks. These were rejected from further consideration for failing to meet designated Track Alignment Screening Criteria 1 or 2.

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| | | The introduction of service along a loop track to connect the San Bernardino Line to the Antelope Valley or Ventura lines would require those trains to cross other lines entering/existing LAUS from the north hindering railroad operations. Metro understands Metrolink is separately in the process of working to align schedules to ease transfers at LAUS. The Project supports run-through tracks for regional and intercity rail trains and HSR trains and aligns with the California State Rail Plan and SCORE Program.<br><br>The Build Alternative and the Build Alternative Design Option design fulfills the provisions of the purpose and need to increase the regional and intercity rail service capacity of LAUS and to improve schedule reliability at LAUS while preserving current levels of freight rail operations. The Build Alternative or the Build Alternative Design Option would not accommodate a future loop track; however, would still effectively reduce constraints from the current stub-end tracks configuration. |
| | **ORG 11-3** | Metro assumes the commenter's mention of "Phase 1" is referring to the interim condition. During the first phase of construction, the two tracks over the freeway will be bidirectional. As discussed in the Comment ORG 5-4 response, the interim condition includes construction of a viaduct over US-101 with a deck wide enough to support regional/intercity rail run-through tracks and HSR tracks. Please also see the Comment ORG 5-5 response, which states that |

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| | additional tracks would be constructed using methods that would maintain railroad operations on existing tracks. |
| | **ORG 11-4** Metro appreciates this statement of support for its plan. Metro will pursue all funding opportunities available to implement the Project. |
| | **ORG 11-5** The Build Alternative and Build Alternative Design Option includes infrastructure improvements that would be implemented in phases, based on projected funding availability and timeline for operation of the planned HSR system.<br><br>As detailed in the Draft EIS/SEIR Chapter 8.0, Public and Agency Outreach, Metro implemented a wide range of formal and informal outreach methods such as in-person and virtual public meetings, business and property owner briefings, coordination meetings with City staff, distribution of legal advertisements, email blasts, door to door visits to potentially affected properties, phone calls to the businesses using publicly available information, Link US Project pamphlet distribution, and social media engagement. These outreach activities demonstrate that Metro and CHSRA met and exceeded legal requirements regarding responsibilities to engage and meaningfully involve all affected communities in the public decision-making process. A list of stakeholder outreach meetings organized by date can be found in Final EIS Chapter 8.0.<br><br>Public noticing of the Draft EIS/SEIR was distributed prior to and during the 45-day |

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| | public comment period to affected local jurisdictions, State and federal agencies, tribes, community organizations, and individuals identified in the stakeholder database (Draft EIS/SEIR Appendix R). Public notice of the Final EIS was also included in local newspapers in areas potentially affected by the Project.<br><br>This distribution of public noticing of the Draft EIS/SEIR ensures that interested parties have an opportunity to express their views regarding the environmental impacts of the Project and to ensure that information pertinent to permits, authorizations, and discretionary approvals is provided to decision makers, lead agencies, and cooperating and participating agencies.<br><br>Contrary to the commenter's claim, the Link US Draft EIS/SEIR formal Public Hearing on July 9, 2024 were not only attended by Metro staff but in fact directly led by Metro staff, including Scott McConnell (Metro Project Manager) and Danielle Valentino (Metro Community Relations Manager).<br><br>During the 45-day public review and comment period (June 21, 2024, through August 9, 2024), comments were received through the Project telephone information line, email, mail, and comment cards submitted at the Link US Draft EIS/SEIR open house and public hearing. All comments received during the comment period were logged and shared with Metro. Metro does have a record of specific voicemails left by TTC on the Project's information line (213.922.2524); however, for |

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| | consistency, tracking, and transparency purposes, any public comment or correspondence received by Metro during the 45-day public comment period is considered a formal comment and are addressed in the Final EIS.<br><br>Metro regrets the lack of response to TTC's earlier inquiries but values the opportunity to address concerns in this document.<br><br>As discussed in the Final EIS Chapter 2.0, Alternatives and Design Options Considered and in Final EIS Chapter 9.0, Build Alternative Design Option, the Build Alternative and Build Alternative Design Option, respectively accommodates the planned HSR system through the Project limits and the physical infrastructure as part of the Burbank to Los Angeles and Los Angeles to Anaheim Project Sections of the HSR system.<br><br>As part of the Build Alternative Design Option, HSR trains would utilize Platforms 3 and 4 and associated Tracks 5 through 8. The Build Alternative and Build Alternative Design Option accommodate the physical location of HSR-related infrastructure and do not preclude future overhead catenaries to support electrified trains through the Project limits.<br><br>As disclosed in Draft EIS/SEIR Chapter 1.0, Purpose and Need, the purpose of the Project is to increase the regional and intercity rail service capacity of LAUS and to improve schedule reliability at LAUS through the implementation of a run through tracks |

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| | configuration and elimination of the current stub-end tracks configuration while preserving current levels of freight rail operations, accommodating the planned HSR system in Southern California, increasing the passenger/pedestrian capacity and enhancing the safety of LAUS through the implementation of a new passenger concourse meeting the multi modal transportation demands at LAUS.<br><br>The commenter's preference for future electrification is noted. The Build Alternative and Build Alternative Design Option does not preclude future overhead catenaries to support electrified trains through the Project limits. It should be noted that Metrolink, Amtrak, and CHSRA, as the rail operators through LAUS, would be responsible for the purchase and operation of electrified trains that move through Project limits.<br><br>Please refer to the Comment 5-6 response regarding the implementation of Mitigation Measure TR-2 during construction to reduce impacts related to service interruptions during construction. |

To minimize future construction delays and interruptions in passenger rail service, TTC recommends that all tracks be electrified and prepared for high-speed rail and electrification of the additional rail corridors serving our region. This provides for a shovel ready project. How will the maximum capacity, directional access, and public benefits of operations be different under Phase 1 and Phase 2? During the first phase of construction, will the two tracks over the freeway be bidirectional? ORG 11-6

Phase 1 of the project must allow a southbound train completing a leg of service terminating at Union station to loop around and head back North or South. It must allow a northbound train to do the same with equal efficiency.

Will construction stop between phases and if so, what are the additional costs of splitting the construction into two phases rather than one project? Building a partial version of the project that only delivers fractional benefits and then requires additional funds to finish the job, creates an undue burden on the public by unnecessarily extending construction. ORG 11-7

Is the plan to come back again with construction crews and close the bridge when adding the additional tracks? What will the impacts of phase two construction be on operations at Union Station in terms of rail access and how long will those impacts last?

TTC believes that any additional interruption in operations would be unacceptable and TTC supports a full build-out of the Link Union Station plan as originally conceived. The original plan should be studied as a shovel-ready alternative and full funding should be explored.

Can Phase 1 and 2 be combined with additional funding available from the Infrastructure Bill or the Inflation Reduction Act to reduce the impacts of starting and stopping construction work? What other funding sources exist to expedite the project benefits including climate resiliency?

We understand that the cost for the project has increased due to inflation, but delaying the project and extending the construction timeline by splitting the project into two phases will likely only continue to inflate the costs. TTC would like to see a unified project studied, but TTC encourages Metro to apply for the additional funding to get it done right the first time. ORG 11-8

Any construction at Union Station will cause headaches and confusion, but TTC believes that doubling construction timelines by splitting the project into two phases will increase the overall cost and create an undue burden of service interruptions and extended construction challenges.

Metro refuses to communicate with TTC directly about the project, and so TTC is forced to jump to speculative conclusions. TTC believes Angelenos and regional visitors deserve the full project as originally envisioned. By building it correctly the first time, Link Union Station will increase capacity and efficiency of service at Union Station which will boost ridership and increase revenues while fighting climate change. Frankly, the project as envisioned is one containing serious negative concerns. ORG 11-9

Sincerely,

Bart Reed
Executive Director

Jeremy Stutes
Director of Special Projects

**ORG 11-6** The commenter's preference for future electrification is noted. The Build Alternative and Build Alternative Design Option does not preclude future overhead catenaries to support electrified trains through the Project limits. The Build Alternative and Build Alternative Design Option does not require overhead catenaries because operators are currently using diesel trains. It should be noted that Metrolink, Amtrak, and CHSRA, as the rail operators through LAUS, would be responsible for the purchase and operation of electrified trains that move through the Project limits. Metro assumes that the commenter is referring to the interim condition when they state the "first phase." During the interim condition of construction, the two tracks over the freeway will be able to operate in either direction (bidirectional).

Please refer to the Comment ORG 11-5 response for a discussion of the proposed infrastructure components for the planned HSR system. As stated in that comment, the Build Alternative and Build Alternative Design Option includes infrastructure improvements in each phase based on projected funding availability and timeline for operation of the planned HSR system.

**ORG 11-7** Please refer to Comment ORG 11-2 response regarding loop tracks. Metro assumes that the commenter is referring to the interim condition with their mention of the "first phase." In the interim condition, run-through tracks would be utilized by trains traveling through the station. Trains terminating service at LAUS and returning

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| | from the same direction would continue to utilize the stub-ended platforms.<br><br>As noted in the Comment ORG 11-4 response, Metro will pursue all funding opportunities available to implement the Project. The Project is proposed to be built in phases (the interim condition and the full build-out condition) to allow the Project benefits to be realized as expeditious as possible, while full funding could be sought. Phasing of infrastructure occurs with any large project. Building the project in phases is due to many necessary reasons and would not cause an undue burden to the community. Each of the scenarios considered in the Final EIS has its own set of benefits with sound reasoning for the components to be constructed. For instance, it would not be a justified expenditure of public tax dollars to construct catenaries through the Project limits to support electrified trains the existing operators do not currently use. As discussed in Chapter 1, Purpose and Need, based on public comments received during the 45-day public comment period related to historic preservation, comments from the SHPO and consulting parties as part of the Section 106 process, and engineering design opportunities that would reduce cost and avoid and reduce the magnitude and intensity of Project-related environmental effects, as compared to the Build Alternative, refinements to the Build Alternative were made; however, the same project benefits would be realized. The Build Alternative Design Option is consistent with all |

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| | provisions of the purpose and need of the Project.<br><br>The Build Alternative Design Option, as discussed in Final EIS Chapter 9.0, Build Alternative Design Option, includes the use of run-through tracks during the interim condition, while trains terminating at LAUS will continue using the stub-ended platforms. The construction of lead tracks, the partially elevated rail yard, and concourse improvements may cause temporary disruptions to commuter travel patterns, which will be minimized with implementation of Mitigation Measure TR-2. As noted in Comment ORG 11-3 response, future tracks would be constructed using methods that would maintain railroad operations on existing tracks.<br><br>Phasing the Project allows benefits to be realized sooner, while additional funding is pursued. The phased approach will not extend or worsen construction-related impacts. The responses above describe how Metro would reduce operational impacts, particularly when additional tracks are added over US-101 while not closing the bridge to run-through operations when additional tracks are added. The environmental impact evaluation is purposely conservative by evaluating potential effects assuming all major Project elements would be constructed concurrently. If run through track infrastructure south of LAUS is constructed prior to the elevated rail yard and concourse-related improvements, fewer construction-related effects and associated truck trips are anticipated to occur than |

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| | disclosed in the Draft EIS/SEIR because the evaluation assumes all major components are constructed concurrently. |
| | **ORG 11-8** Metro assumes that the commenter is referring to the interim condition and the full build-out condition when they state "Phase 1" and "Phase 2." The Build Alternative Design Option includes all infrastructure improvements in the interim condition and full build-out condition. All Project components could be constructed if additional funding were available. As noted in the Comment ORG 11-4 response, Metro will pursue all funding opportunities available to implement the Project including but not limited to federal, state, and local opportunities. The phased construction approach is not expected to create an undue burden of service interruptions and other construction related impacts for the reasons described above in the Comment ORG 11-7 response. |
| | **ORG 11-9** Please refer to the Comment ORG 11-4 response. Metro does not "refuse" to communicate with TTC directly about the Project. Metro has documented communication with TTC throughout the environmental review process and has identified them in the Stakeholder Database (Final EIS Appendix R, Public Outreach Plan, and Appendix B, Stakeholder Database). Metro is committed to continuing meaningful engagement with local stakeholders during the environmental clearance, design, and construction phases of the Project. As discussed in the Final EIS Appendix D, *Community Impact Assessment*, Section 6.6.3, the Project is anticipated to result in |

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| | improved operational efficiency, capacity, flexibility, and connectivity for trains using LAUS, which would provide a wide range of beneficial impacts on the community as a whole and to transit users especially. Additionally, the Project would directly benefit the public through creation of retail jobs due to the addition of retail areas at the concourse. This retail space would generate employment, labor income, and tax revenues. The Project would also indirectly contribute to cumulative benefits for the region, including a reduction of greenhouse gas emissions and vehicle miles traveled in the region. |

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| **Comment Number:** ORG 12<br>**Name:** Marisa Olguin, Vernon Chamber of Commerce<br>**Date Received:** 08/09/2024<br>**Format Received:** Email | **ORG 12 Marisa Olguin, Vernon Chamber of Commerce** |




August 9, 2024

Metro
Attn: Carlos J. Montez
Deputy Executive Director
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

RE: Link US – Draft EIS / SEIR

Dear Mr Montez,

Vernon Chamber of Commerce submits the following comments in response to the Draft Environmental Impact Statement and Supplemental Environmental Impact Report (EIS / SEIR) for the Los Angeles County Metropolitan Transportation Authority (Metro) Link US Project as it relays to the expansion of rail tracks around the BNSF Railway Malabar Yard in the City of Vernon.

On behalf of 1,400 business and property owners, a daytime population of 50,000 workers, and the residents and community members who come to the City of Vernon every day, Vernon Chamber is very concerned over the process and methodology taken by Metro as a supplemental plan for BNSF to expand its rail activity into the City of Vernon.

ORG 12-1

These comments detail the process and key inconsistencies found in the EIS/SEIR and recommendations for an alternative plan.

**Traffic Congestion / Economic Impacts Page 2-4; Page 3.3-3**
The influx of 400 rail cars will significantly increase traffic congestion in the area. The report outlines that the length of future trains could range up to 4,000', (approximately 60 train cars at a time) will travel through 46th Street, gridlocking traffic and business operations, delay delivery and pick-up operations, and hamper thousands who come to work or conduct business in the City from West to East. This will impede the daily operations of businesses, causing delays in deliveries and customer access, which can result in financial losses. The EIS/SEIR report does not include just the immediate streets at 49th, 46th and surrounding streets. It also includes the streets of:

ORG 12-2

- Pacific Blvd
- Seville Avenue
- Soto Street
- 44th Street
- Boyle Avenue
- Alcoa Avenue
- Downey Road

**ORG 12-1** Metro appreciates the comments provided on the Draft EIS/SEIR for the Link US Project. Metro recognizes the concerns of the Vernon Chamber of Commerce, which represents a large number of businesses and residents in the area.

Metro appreciates the feedback provided on the process and methodology used in the Draft EIS/SEIR. Metro is committed to addressing these concerns and maximizing transparency in the review process.

As discussed below in the responses to comments, the proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from Los Angeles Junction. Daily train movements on the Harbor Subdivision (parallel to Santa Fe Avenue) would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Key Issue Response #2, Table 2 and Figures 7 and 8). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent fewer train movements on the Harbor Subdivision (parallel to Santa Fe Avenue). In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day).

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| | Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements and develop solutions that preserve the city's economic vitality and connectivity to the extent feasible.<br><br>**ORG 12-2** Please refer to Comment ORG 12-1 response for a discussion on consolidated train movements/reduced train frequencies in Vernon. The responses below address the comments related to the total number of rail cars expected to move along the 46th Street Connector, the localized traffic analysis conducted and the intersections and roadway segments considered, mitigation measures to reduce Project-related traffic delays, and the COVID-19 factor methodology applied to normalize traffic counts.<br><br>• Total Number of Rail Cars on 46th Street Connector - Trains operating on the 46th Street Connector would be up to 3,000 feet long (similar to the existing condition) and not expected to result in 400 new rail cars out of the east entrance of Malabar Yard. Using the typical number of rail cars travelling on the 46th Street Connector (Draft EIS/SEIR Appendix Q, Section 2.3.3) and the length of each train anticipated to operate on the 46th Street Connector (up to 3,000 feet as clarified in Key Issue Response #2), each train is expected to carry up to 45 cars. Based on the future Project-related train |

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| | movements that would operate on the 46th Street Connector (4 daily train movements), up to 180 rail cars would move along the 46th Street Connector per day as a result of the Malabar Yard railroad improvements. As disclosed in Key Issue Response #2, half of the trains operating on the 46th Street Connector (with 90 of the total 180 rail cars) would operate during the night (7:30pm to 2:00am).<br><br>• Localized Traffic Analysis Conducted /Intersections and Roadway Segments Considered - The Draft EIS/SEIR includes a thorough and comprehensive evaluation of potential adverse effects from implementation of the Malabar Yard railroad improvements, including traffic and transportation effects associated with railroad operations. The anticipated traffic redistribution and change in traffic along with the list of study intersections and roadway segments patterns was coordinated with the City of Vernon to obtain feedback on the approach before the traffic analysis was performed.<br><br>As discussed in Key Issue Response #2, due to the Project related redistribution of existing traffic, a localized traffic analysis was conducted for intersections and roadway segments within the proximity to the Malabar Yard railroad improvements where traffic redistribution is expected to occur. The traffic study area is shown in Draft EIS/SEIR Appendix Q Section 3.3.3, Figure 3.3-1, and demonstrates that |

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| | traffic impacts at Pacific Boulevard, Seville Avenue, and Soto Street were all considered to determine if the Malabar Yard railroad improvements would increase traffic delay to a level that would exceed applicable v/c thresholds.<br><br>For 44th Street, Boyle Avenue, Alcoa Avenue, and Downey Road, the four additional train movements that would pass these intersections for BNSF to serve customers on the west side of the City of Vernon (Exxon and West Seville), two movements would occur at night (7:30pm to 2:00am) and two movements would occur during the day (6:30am to 2:00pm). These intersections were not considered because traffic redistribution is not expected to occur at these locations. Based on the queuing analysis performed and in response to property owner questions raised in January 2025, Metro conducted a calculation to determine the percentage of time in a 24-hour period that the four additional train movements per day (and the two existing trains movements) may block access to a driveway on 46th Street, which can also be used to demonstrate the overall percentage of time trains may block an intersection along the East Seville Connection from Soto Street to the Los Angeles Junction where a detailed traffic evaluation was not conducted. The calculation assumes 6 train movements per day, with a 3,000-foot train plus 500 feet on either end for gate activation and |

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| | clearing, traveling at 10 miles per hour, and demonstrates that trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Based on consideration of context and intensity, no adverse effect would occur related to traffic delay at the railroad crossing intersections from Soto Street to Los Angeles Junction where 44th Street, Boyle Avenue, Alcoa Avenue, and Downey Road are located.<br><br>As presented in the Final EIS Appendix Q Section 3.3, Page 3.3-10 and in Key Issue Response #2, a queuing analysis was prepared at six locations in response to stakeholder engagement activities to determine whether the existing travel lane storage capacity is adequate to accommodate the queue formations generated from redistributed traffic. The results of the queuing analysis demonstrate for the Opening Year (2024), no increase to the queue formation would be attributable to the Malabar Yard railroad improvements with exception of northbound through movements at Railroad Crossing #4 where there is 20 feet of incremental addition to the existing queuing that already occurs. The increase in queue formation is not considered a substantial change for two main reasons: 1) the additional 20 feet of queue formation translates into less than a vehicle of queue since one vehicle queue is 25 feet; and 2) because the added queue can be |

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| | adequately accommodated with the current configuration of the roadway and it would take only one cycle of phasing to clear out the additional 20 feet of incremental addition to the existing queuing that already occurs without the need for any further improvements in lane configuration.<br><br>With the Malabar Yard railroad improvements, 3.15 fewer trains would operate in the City and half of the train movements would occur at night, which have very little to no impact on traffic. For trains operating during the day, if a train movement occurs during the AM and PM peak periods, there could be some effect, but trains are not anticipated to operate at the same time every day and are not all occurring during the AM or PM peak periods. The hourly schedule to service Vernon customers fluctuates and is variable throughout the week based on customer demand.<br><br>In March 2025, Metro facilitated a Community Meeting/Open House in the City of Vernon. Multiple comments were raised by the community regarding the duration of time that intersections could be blocked by freight trains. In response to these comments, in April 2025 Metro installed cameras at multiple locations throughout the City to record continuous train activity over the course of a week (April 19–25, 2025), 24-hours per day.<br><br>Applying the video footage collected, Metro performed an intersection |

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| | delay/blockage analysis to document intersection delay/blockage which would occur in the existing condition and with implementation of the Malabar Yard railroad improvements. Metro presented the results of the intersection delay/blockage analysis on June 17, 2025, to the Vernon City Council and on June 23, 2025, to the Vernon Chamber of Commerce. Multiple property owners and business representatives attended both meetings.<br><br>Based on the video data collected, results were summarized for two conditions (Actual Condition [based on observed train activity] and Worst-Case Condition) to determine how the Malabar Yard railroad improvements would change intersection delay/blockage at eight locations and effects to citywide vehicular circulation. Results are summarized below:<br><br>1. Actual Condition (based on observed train activity)<br><br>a. Length of Observed Trains: 350 feet to 1,500 feet<br><br>b. Daily Intersection Blockage Results: With Malabar Yard railroad improvements, daily intersection delay/blockage would be reduced by 30 minutes.<br><br>2. Worst Case Condition |

a. Length of Longest Potential Trains: 3,000 feet

b. Daily Intersection Blockage Results: If longer trains are needed due to customer demand in the City of Vernon, the corresponding reduction in daily intersection blockage with the Malabar Yard railroad improvements would also increase as compared to the existing condition. Assuming 3,000-foot trains would operate on any given day, daily intersection delay/blockage would be reduced by over 1 hour and 20 minutes. This reduction is based on the assumption that in the existing condition trains would operate with the same length (3,000 feet) without the Malabar Yard railroad improvements.

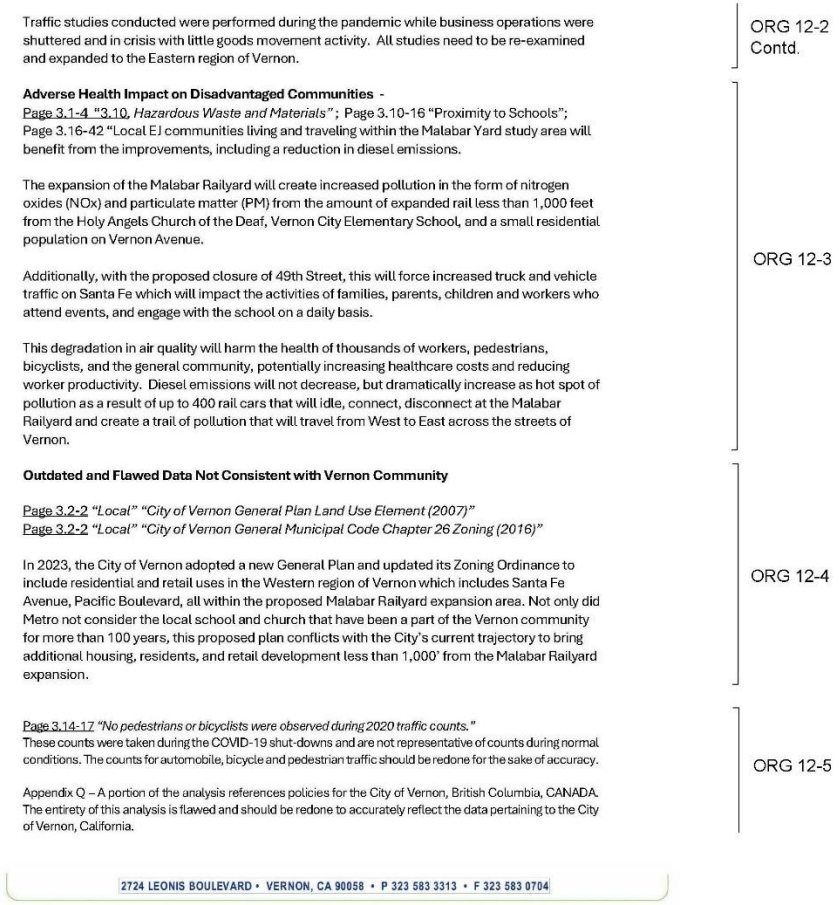
Based on the train observations conducted in April 2025, the data supports the conclusion that with implementation of the Malabar Yard railroad improvements, a citywide circulation improvement would occur. This is primarily because:

1. 3.15 fewer trains would operate in the City of Vernon, and

2. In the current condition, BNSF's "train building" activities occur on City streets north of Malabar Yard

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| | (Pacific Avenue), which triggers a substantial amount of time when railroad gates are down, delaying/blocking vehicular traffic. With the implementation of the Malabar Yard railroad improvements, most train building activities will be relocated to BNSF's Los Angeles Junction (LAJ) rail yard on the east side of the City.<br>• Mitigation Measures to Reduce Traffic Delay - In regard to traffic delays, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue - construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue - operations, and Fruitland Avenue - operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such Project-related traffic delays would not contribute to gridlocked traffic or hinder business operations, delay deliveries and pickups, or the ability of workers to travel through the city.<br>• COVID-19 Factor Methodology - As discussed in Key Issue Response #2, a COVID factor was used to estimated traffic conditions in 2020 without |

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| | COVID-19. The approach to normalize the traffic count data collected in August 2020 during the COVID 19 pandemic to the traffic levels that existed pre COVID 19 is presented in Final EIS Appendix Q Section 3.3, Transportation, Page 3.3-4 and summarized in Key Issue Response #2. This methodology is an industry standard approach taken during the COVID 19 pandemic and was coordinated with the City of Vernon to obtain feedback on the approach before using the adjusted volumes in the traffic analysis. The traffic volumes presented in Draft EIS/SEIR Appendix Q represent the baseline condition at the time the environmental evaluation commenced and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes. |



Traffic studies conducted were performed during the pandemic while business operations were shuttered and in crisis with little goods movement activity. All studies need to be re-examined and expanded to the Eastern region of Vernon.

ORG 12-2 Contd.

**Adverse Health Impact on Disadvantaged Communities -**
Page 3.1-4 "3.10, *Hazardous Waste and Materials"*; Page 3.10-16 "Proximity to Schools"; Page 3.16-42 "Local EJ communities living and traveling within the Malabar Yard study area will benefit from the improvements, including a reduction in diesel emissions.

The expansion of the Malabar Railyard will create increased pollution in the form of nitrogen oxides (NOx) and particulate matter (PM) from the amount of expanded rail less than 1,000 feet from the Holy Angels Church of the Deaf, Vernon City Elementary School, and a small residential population on Vernon Avenue.

Additionally, with the proposed closure of 49th Street, this will force increased truck and vehicle traffic on Santa Fe which will impact the activities of families, parents, children and workers who attend events, and engage with the school on a daily basis.

This degradation in air quality will harm the health of thousands of workers, pedestrians, bicyclists, and the general community, potentially increasing healthcare costs and reducing worker productivity. Diesel emissions will not decrease, but dramatically increase as hot spot of pollution as a result of up to 400 rail cars that will idle, connect, disconnect at the Malabar Railyard and create a trail of pollution that will travel from West to East across the streets of Vernon.

ORG 12-3

**Outdated and Flawed Data Not Consistent with Vernon Community**

Page 3.2-2 *"Local" "City of Vernon General Plan Land Use Element (2007)"*
Page 3.2-2 *"Local" "City of Vernon General Municipal Code Chapter 26 Zoning (2016)"*

In 2023, the City of Vernon adopted a new General Plan and updated its Zoning Ordinance to include residential and retail uses in the Western region of Vernon which includes Santa Fe Avenue, Pacific Boulevard, all within the proposed Malabar Railyard expansion area. Not only did Metro not consider the local school and church that have been a part of the Vernon community for more than 100 years, this proposed plan conflicts with the City's current trajectory to bring additional housing, residents, and retail development less than 1,000' from the Malabar Railyard expansion.

ORG 12-4

Page 3.14-17 *"No pedestrians or bicyclists were observed during 2020 traffic counts."*
These counts were taken during the COVID-19 shut-downs and are not representative of counts during normal conditions. The counts for automobile, bicycle and pedestrian traffic should be redone for the sake of accuracy.

Appendix Q – A portion of the analysis references policies for the City of Vernon, British Columbia, CANADA. The entirety of this analysis is flawed and should be redone to accurately reflect the data pertaining to the City of Vernon, California.

ORG 12-5

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**ORG 12-3** The Draft EIS/SEIR Section 3.5 and Draft EIS/SEIR Appendix G both discuss the potential impacts related to pollution (air quality, climate change, and health risk) associated with the Build Alternative and Malabar Yard railroad improvements combined. A similar level of detailed analysis was prepared for the Build Alternative Design Option with Malabar Yard railroad improvements, and is provided in Final EIS Chapter 9, Build Alternative Design Option.

As discussed in Key Issue Response #3, based on South Coast Air Quality Management's (SCAQMD) definition, sensitive receptors are identified as locations where an individual could remain for 24 hours and includes land uses such as residences, schools, playgrounds and athletic facilities on school property, childcare centers, long term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. Workers at commercial and industrial facilities are not included because these individuals do not remain onsite for 24 hours.

Based on the type of infrastructure improvements proposed, a buffer of one-quarter mile is used to identify sensitive receptors for further consideration of potential impacts. The nearest sensitive receptors identified and considered in the air quality analysis for the Malabar Yard railroad improvements were:

- Residences at 2415 2427 E 53rd St. (located approximately 1,325 feet [0.25

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| | mile] south of the Malabar Yard railroad improvements),<br>• Vernon City School at 2360 East Vernon Avenue (located approximately 1,350 feet [0.25 mile] northwest of the Malabar Yard railroad improvements), and<br>• Residences on Furlong Place (located approximately 1,650 feet [0.31 mile] northwest of the Malabar Yard railroad improvements).<br><br>Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling (which includes truck idling) associated with the Malabar Yard railroad improvements. The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from the Los Angeles Junction. The consolidated train movements would result in 78 percent less train movements on the Harbor Subdivision coming from/to the San Bernardino Subdivision. Thus, fewer train movements on the Harbor Subdivision equates to less vehicle idling (including truck idling) at each of the at-grade crossings where sensitive receptors are located, such as the Vernon City School. Because the implementation of the 46th Street Connector would shift freight rail activity away from sensitive receptors, vehicle idling (including truck idling) at Malabar Yard would be so minimal it would not cause a violation of any air quality standard. |

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| | General Conformity is the pollution prevention and control program that requires a federal agency to assure any proposed activity the agency proposes will conform to the purpose of applicable implementation plans and will not interfere with a State or Tribe's ability to attain and maintain the National Ambient Air Quality Standards (NAAQS) for air quality, as required under Clean Air Act (CAA) section 176(c).<br><br>The purpose of the General Conformity rule is to ensure that:<br><br>• federal activities do not cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS);<br><br>• actions do not worsen existing violations of the NAAQS; and<br><br>• attainment of the NAAQS is not delayed.<br><br>As demonstrated in the Final EIS pages 3.5-26 to 3.5-34, RONA, and Appendix G of the Final EIS, the annual construction emissions and annual net change in operational emissions for all analysis years generated by the Build Alternative and Malabar Yard railroad improvements, as compared to the No Action Alternative, are below the general conformity de minimis levels for all years of analysis with implementation of mitigation. As such a formal general conformity determination with additional localized analyses are not required. The Build Alternative and Malabar Yard railroad |

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| | improvements would not interfere with the state's plans to attain and maintain the NAAQS. A detailed $PM_{10}$ and $PM_{2.5}$ hot-spot analysis was not completed because FCAA and 40 CFR 93.116 requirements would be met without an explicit hot-spot analysis.<br><br>As detailed in the Key Issue Response #3, localized air quality impacts, under CEQA, were evaluated using the localized significance threshold methodology from SCAQMD. This methodology sets a screening level threshold based on the pollutant (NOx, CO, $PM_{10}$, $PM_{2.5}$) and the distance to the nearest air quality sensitive receptor in that source receptor area (location). On-site emissions are calculated and then compared to these thresholds. SCAQMD uses the localized significance threshold (LSTs) to evaluate if projects qualify to be screened out from the requirement to conduct project-specific dispersion modeling. If required, the purpose of dispersion modeling is to demonstrate that a project would not delay attainment of ambient air standards. If a project's on-site emissions are below the LSTs, then no further analysis with dispersion modeling is required. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of an ambient air standard.<br><br>As indicated in Final SEIR, Table 7-31 criteria pollutants would not exceed SCAQMD thresholds during construction or operations and air quality impacts associated with the Malabar Yard railroad improvements would be less than significant. Regarding |

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| | localized emissions, the Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. On-site construction emissions at Malabar Yard were compared to local screening thresholds from SCAQMD and were found to be below the thresholds for all criteria air pollutants ($NO_x$, CO, $PM_{10}$, $PM_{2.5}$) (see Appendix F of Final EIS Appendix Q). Air quality impacts to sensitive receptors further away from the emission source would be less likely to be impacted than those identified through the localized analysis. Localized air pollutant emissions at Malabar Yard where the 49th Street Closure is proposed or along the 46th Street Connector, would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.<br><br>Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. As discussed in that response, construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling at each of the at-grade crossings where sensitive receptors are located, such as the Vernon City School and residences located along Furlong Place. Because the implementation of the 46th Street Connector would shift freight rail |

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| | activity away from sensitive receptors, vehicle idling would not cause a violation of any air quality standard.<br><br>Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Final EIS Appendix Q Section 3.5, Section 3.5.4. In addition to the regional air quality benefits, from a localized perspective, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard. Because the trains are a source of diesel particulate matter (DPM), which is the primary pollutant in $PM_{10}$, this shift of freight trains would reduce the exposure to DPM at the sensitive receptor locations including Vernon City School and the residences on Furlong Place.<br><br>The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of |

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| | Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>For the reasons described above, the Malabar Yard railroad improvements would not degrade air quality, create a trail of pollution in the City, or harm the health of workers, pedestrians, bicyclists, or the general community in a manner that would contribute to increased healthcare costs or worker productivity.<br><br>**ORG 12-4** The Vernon City School and Holy Angels Church of the Deaf were considered in the environmental evaluation (see Draft EIS/SEIR Appendix Q, Draft Environmental Evaluation of Malabar Yard Mitigation, Section 3.5, Page 3.5-13, Section 3.6, Page 3.6-7, Section 3.10, Page 3.10-16 and Section 3.15, Page 3.15-10). Since the Vernon City School and Holy Angels Church of the Deaf were determined to be located outside the Malabar Yard study area, no further analysis was necessary.<br><br>The *2023 Vernon Westside Zone Change and General Plan Amendment* (adopted July 2023) was not considered in the Draft EIS/SEIR environmental evaluation because the zone change and amendment was not formally adopted at the time the Revised NOI |

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| | was issued in September 2020. As required by 40 C.F.R. 1502.16(c), Metro performed a consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023) for inclusion in the Final EIS. Based on the analysis performed in the Final EIS Volume III Introduction Table 5, the Malabar Yard railroad improvements were determined to be consistent with the goals and policies within the *2023 Vernon Westside Zone Change and General Plan Amendment*. Therefore, no conflict would occur with the implementation of Malabar Yard railroad improvements.<br><br>The Malabar Yard railroad improvements would facilitate the consolidation of freight service in the city from Los Angeles Junction; thereby reducing the total daily train movements on the Harbor Subdivision parallel to Santa Fe Avenue where future mixed-use development is planned. This reduction of train movements would result in a benefit of localized air emissions and noise and vibration reductions to nearby sensitive receptors that are currently present, in addition to future sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Draft EIS/SEIR. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing |

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| | | mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis.<br><br>Metro acknowledges the importance of considering updated planning and zoning regulations when evaluating the environmental impacts of the Malabar Yard railroad improvements. For these reasons, Metro and the City of Vernon staff have been working collaboratively to develop solutions that preserve the city's economy, jobs, and the health and welfare of its current and future residents and workers.<br><br>See Comment ORG 10-3 response for a description of the localized air quality analysis performed in the City of Vernon for the Malabar Yard railroad improvements. |
| | **ORG 12-5** | The environmental evaluation for the Malabar Yard railroad improvements (and collection of existing baseline information to define the affected environment/ environmental setting) initiated upon release of the Revised NOI in September 2020. Field observations and feedback from nearby property owners and business stakeholders confirmed that biking is not a widely used |

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| | mode of transport in the Malabar Yard Study Area due to heavy truck traffic and narrow street configurations. The traffic analysis performed for the Malabar Yard railroad improvements was prepared pursuant to the requirements of *Traffic Impact Analysis Report Guidelines* (County of Los Angeles 1997). The analysis was performed to determine if significant impacts or adverse effects would occur based on the v/c ratio thresholds using the Intersection Capacity Utilization (ICU) methodology which does not take into account the pedestrians and bicycles. Therefore, new pedestrian and bicycle counts are not warranted.<br><br>The inclusion of references to policies from Vernon, British Columbia, Canada, was a clear oversight. The reference to the "City of Vernon Tree Protection Bylaw #4152 (1996)" for the City of Vernon, British Columbia has been removed from the Final EIS Section ES.0, Final SEIR, Final EIS Appendix Q Section ES.0, and Final EIS Appendix Q Section 3.7. Malabar Yard Mitigation Measure BIO-2 was updated in the locations listed above to refer to the City of Vernon's Tree Ordinance (Code of Ordinances, Chapter 12.24, Street Trees), in California. All other references and citations regarding the City of Vernon were reviewed and verified accurate. The potential impacts and conclusions related to tree removal disclosed in the Draft EIS/SEIR are still valid. Malabar Yard Mitigation Measure BIO-2 requires the contractor to obtain a permit for impacts to any City owned tree protected under the City of Vernon's Tree Ordinance (Code of Ordinances Chapter 12.24, Street Trees). |

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| | Please refer to Comment ORG 12-1 response regarding reduced train frequencies in the City of Vernon. As discussed in that response and in in Table 2 of Key Issue Response #2, 8 daily train movements occur on the affected routes considered (Figure 7), and in the future condition, a total of 4.85 daily train movements would occur on these same affected routes (Figure 8). As shown in Table 2, the total daily frequency of train movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night.<br><br>The Malabar Yard railroad improvements were evaluated with the intent of balancing operational needs and minimizing community impacts. The analysis includes projections and modeling to account for typical operational patterns, and the conclusions are based on a combination of historical data, stakeholder input, and expert analysis.<br><br>The Malabar Yard railroad improvements would not “take over” 46th Street. Instead, the roadway configuration of 46th Street near the Stacy Medical Center would accommodate two lanes of vehicular traffic and the spur line track similar to the existing roadway configuration. In the existing condition, vehicle travel already occurs parallel to moving trains on the portion of 46th Street adjacent to the Stacy Medical Center. Based on the outcome of the meeting held with the owner of Stacy Medical |

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| | Center on January 9, 2025, Metro will research safety devices, and barriers that could be incorporated into the design to prevent a collision with trains as cars exit the Stacy Medical Center/Wells Fargo Building Parking Lot on 46th Street (while a train is present). Metro also committed to research potential roadway design modifications that could potentially allow a right-hand turn while a train is passing through the 46th Street/Pacific Boulevard intersection.<br><br>As discussed in Comment ORG 12-2 response, based on the queuing analysis performed and in response to property owner questions raised in January 2025, Metro conducted a calculation to determine the percentage of time in a 24-hour period that the four additional train movements per day (and the two existing trains movements) may block access to a driveway on 46th Street, which can also be used to demonstrate the overall percentage of time trains may operate across the driveway serving Stacy Medical Center. The calculation assumes 6 train movements per day, with a 3,000-foot train plus 500 feet on either end for gate activation and clearing, traveling at 10 miles per hour, and demonstrates that trains would operate across Stacy Medical Center approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Based on consideration of context and intensity, operation of trains on the 46th Street Connector would not cause a safety hazard as it relates to access to Stacy Medical Center. |

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| | Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, based on the extensive emergency response analysis performed in coordination with the City of Vernon, the sum of the worst-case daily delay for the affected train routes is 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction to total delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers.<br><br>Please see Key Issue Response #5 for a discussion of operational and physical impacts to businesses. Based on the Project footprint for both design options considered a total of 11 parcels would be directly impacted by physical impacts. As discussed in Key Issue Response #5, some job loss resulting from potential building demolition may occur; however, as part of Metro's Relocation Assistance Program and the Uniform Relocation Act benefits processes, |

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| | any businesses subject to building demolition or displacement would be compensated or referred to potential and/or suitable replacement sites. Parking impacts may occur, and when considering both context (total spaces available) and intensity (number of spaces removed), no adverse effect would occur because the properties would still be usable. Operational and physical impacts to businesses would be minimized by implementing Design Option 2, as the preferred design option, at both locations.<br><br>The Malabar Yard railroad improvements would not split any throughfares within the City. The 46th Street Connector is proposed on the southern edge of 46th Street between two active rail lines.<br><br>As discussed in Key Issue Response #5, some property acquisition may be required and parking impacts may occur; however, when considering both context (total spaces available) and intensity (number of spaces removed), no adverse effect would occur because the properties would still be usable. Operational and physical impacts to businesses would be minimized by implementing Design Option 2, as the preferred design option, at both locations. The comments provided on the Draft EIS/SEIR with regards to impacts on businesses in the City of Vernon have been taken into consideration and coordination with the City of Vernon and business stakeholders will be ongoing to minimize the extent of impacts during construction and operation. |

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**Safety Hazards** – Page 3.16-18

Increased rail traffic heightens the risk of accidents, both on the tracks and at crossings. This poses a direct threat to the safety of employees and customers, potentially leading to injuries or fatalities. Specifically, patients who need emergency services at Stacy Medical Center located at Pacific Blvd and 46th Street will be directly impacted by the rail activity that is proposed to "take over" the current two-lane street. This will put the lives of injured workers and patients at risk to have access to the medical center and also to deal with the delays of train activity that will run through this street.

Additionally, increased rail traffic prevents police and fire services to respond promptly and within its average of three-minutes to accidents and health emergencies that occur within the City.

This proposed plan not only detrimentally impacts the immediate 27-31 businesses within Metro's disclosed area, but it also impacts and splits the City's existing, narrow-street thoroughfares West to East.

ORG 12-5 Contd.

**Economic Impacts to Businesses**

The Malabar Railyard expansion will directly devastate approximately 27-31 businesses on the streets of 46th, 49th, and also includes those businesses on Hampton, Santa Fe, Seville, Pacific Blvd, Chambers, and Leonis Blvd.

Vernon Chamber opposes the design options presented that includes the closure of 49th Street and the addition of new rail on 46th Street which will "take" the properties of established businesses and create economic stability for the community.

Increased tracks and the slow movement of up to 60 connected cars passing through Pacific Blvd, taking over the two-lane street of 46th, changes the business operations of close to 31 business and properties which will result in property value decline, shattered business activity, poor to no access to onloading and offloading of goods, and true environmental degradation to the immediate area.

ORG 12-6

While Vernon Chamber of Commerce can appreciate Metro's plans to usher in the largest multi-modal transportation hub that will create an interconnection rail system between six counties, Metro Link US's approach to consider the City of Vernon's progress and current community character has been misguided.

Offloading freight train cars from Union Station onto the community and streets of Vernon only pushes the emissions further South to disadvantaged communities and hard-working, blue-collar workers who come to Vernon every day. This proposed plan unravels the great progress and transformation Vernon has achieved over the past decade to improve air quality in the City, reduce noise and odors, historically amend its zoning ordinance to add more housing and residents, and its efforts to strategically attract "greener" industries, a pivot from traditional heavy industrial users of the past.

ORG 12-7

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**ORG 12-6** Please refer to Comment 12-5 response regarding the number of potentially affected parcels and acquisitions that may result from Design Option 2 at both locations, the preferred design option. As discussed above, the 46th Street Connector is not proposed to "take over" 46th Street. There are already two existing railroad spurs present that the proposed railroad connection would tie into.

The Malabar Yard railroad improvements would facilitate safe and legal access to businesses. Property values would not be reduced because uses on the parcels could be maintained and fair compensation would be provided for any required acquisitions.

Metro is committed to minimizing the effects of the Project on the businesses located near Malabar Yard. As detailed in the Draft EIS/SEIR Appendix Q, Draft Environmental Evaluation of Malabar Yard Mitigation, Chapter 2.0, two design options at each location were considered to reduce impacts on business access, including ingress/egress, truck circulation, and property acquisition. The proposed Design Option 2 was specifically developed in response to stakeholder feedback, which would result in less displacement of businesses and fewer disruptions compared to Design Option 1. Design Option 1 would result in the displacement of existing businesses on three parcels with approximately 48,872 square feet of building space and up to 46 jobs. Design Option 2 would result in the demolition of one building on one parcel with a total of approximately

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| | | 9,711 square feet of building space and up to 9 jobs. Please refer to Key Issue Response #5 for a discussion of operational and physical impacts to businesses.<br><br>Metro disagrees that the 46th Street Connector would "take over the two-lane street of 46th." Instead, only a portion of the 46th Street roadway would result in a change to the existing condition. Vehicles already share a portion of 46th Street with trains. This condition would extend along the south side of 46th Street between the existing spur line to Seville Avenue.<br><br>Metro understands the concerns about potential property value declines and disruptions to business activities, and Metro staff has been meeting with property owners to provide a Project update and obtain valuable feedback. It is important to note that the Project is designed to improve long-term transportation infrastructure, which is expected to bring broader economic benefits to the region. Additionally, Metro has proposed mitigation measures aimed at minimizing construction impacts and ensuring continued access to businesses.<br><br>Metro appreciates the commenter's positive comments on the benefits of the Link US Project. |
| | **ORG 12-7** | Please refer to the Comment ORG 12-1 through Comment ORG 12-6 responses**.** Metro is committed to continuing the ongoing coordination with BNSF and the City of Vernon to avoid, minimize, and mitigate potential impacts associated with the |

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| | Malabar Yard railroad improvements to the extent feasible. The analysis demonstrated in the Final EIS is that the Malabar Yard railroad improvements would not "unravel" the City of Vernon's "great progress and transformation" that it has "achieved over the past decade." Metro has not "rushed-through" the EIS/SEIR, but has completed a thorough, deliberate analysis that has accounted for the past and current conditions and changes in the City of Vernon. |



Vernon has worked very hard to adopt ordinances for cleaner air quality and become a more environmentally friendly community to the Southeast Los Angeles region.

We believe this approach to include BNSF's Malabar Railyard with a rushed-through adoption of the EIS/SEIR, which includes incomplete research or recognition of the transformative change that the City of Vernon has implemented over the 10-13 years, must be understood.

ORG 12-7 Contd.

Vernon Chamber strongly urges Metro Link US to reconduct all studies that will accurately reflect a post-pandemic economic environment, and to properly conduct stakeholder outreach that allows for true community input.

ORG 12-8

Sincerely,

Marisa Olguin, President / CEO
Vernon Chamber of Commerce
2724 Leonis Blvd
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**ORG 12-8** The commenter's assertions in its letter do not demonstrate any need for reconducting all of the technical studies. Malabar Yard Mitigation Measure TR-1 requires a construction TMP to be prepared by the contractor and reviewed and approved by Metro and the City of Vernon.

In 2020, 2021, 2024, and 2025, Metro coordinated with the City of Vernon and the Vernon Chamber of Commerce to obtain feedback on the stakeholder engagement approach, to identify stakeholders that may be affected or have interest in the Project, and to support Metro in disseminating information related to the environmental review process for the Malabar Yard railroad improvements.

Between December 2024 to June 2025 Metro conducted meetings with the City of Vernon to address comments raised during the Draft EIS/SEIR public comment period, comments raised by the Vernon Chamber of Commerce, and comments raised by affected property owners and tenants, and other community members. During each of the meetings with City staff, an emphasis was placed on the alternatives analysis process for the Malabar Yard railroad improvements, reduced train movements that would result in the City from the consolidated freight railroad operations, how fewer train movements on the Harbor Subdivision (parallel with Santa Fe Avenue) would complement the City's initiatives outlined in the *2023 Vernon Westside Zone Change and General Plan Amendment* and

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| | enable improved citywide circulation and quicker emergency response throughout the city, potential impacts on business operations, and community improvements that would further offset potential effects in the City.<br><br>After the Draft EIS/SEIR public comment period, Metro also conducted meetings with individual property owners and/or tenants potentially affected by the Malabar Yard railroad improvements and other community members that provided comments on the Draft EIS/SEIR during the public comment period to address specific concerns, some of which were raised as formal comments during the Draft EIS/SEIR public comment period. Metro conducted these meetings on-site at each individual property, Vernon City Hall, or virtually. Between December 2024 and February 2025, Metro met with 10 of 11 property owners/tenants that would be directly impacted by the Malabar Yard railroad improvements and 3 additional property owners/tenants and/or representatives that are not directly impacted but provided comments on the Draft EIS/SEIR during the Draft EIS/SEIR public comment period. The 13 property owners, tenants, and representatives that Metro met with in-person or virtually from December 2024 to February 2025 are discussed in detail in Key Issue Response #1.<br><br>On June 23 2025, Metro took the opportunity to present to the Vernon Chamber of Commerce the responses to comments that would be presented in the Final EIS, share the progress of the meetings held with the |

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| | City of Vernon, affected property owners/tenants, and other community members, and to support Metro in disseminating information related to the changes in train movements and citywide circulation improvements, offsetting mitigation measures, and the environmental review process for the Malabar Yard railroad improvements.<br><br>Please refer to Key Issue Response #1 for a discussion of stakeholder engagement activities conducted in the City of Vernon to support the environmental review process for the Malabar Yard railroad improvements. Metro is committed to continuing collaboration with the City of Vernon. |

# Link US Final EIS Volume III

# Responses to Comments - Individuals

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**Name:** Joey Quinto, California Journal for Filipino Americans

**Date Received:** 06/21/24

**Format Received:** Email

Attn: Carlos J. Montez

Deputy Executive Officer

Could you please direct us on how CalJournal help MTA reach our readers via advertising in our newspaper. IND 1-1

Thank you.

Joey Quinto

Publisher

California Journal For Filipino Americans

(310) 480-3781

Email: cjfilam@gmail.com

CalJournal.com

CJFilAm.com

## IND 1 Joey Quinto

**IND 1-1** Metro appreciates the California Journal for Filipino Americans reaching out on behalf of its readers, and Metro is committed to the success of small businesses that are interested in working with Metro.

**Name:** Jason Sleisenger

**Date Received:** 06/21/24

**Format Received:** Email

Please ensure that electric EV chargers will still be accessible both during and after construction finishes. This is so crucial for drivers who want to park and ride with EV vehicles. The current lot is good and hope it will remain or a good replacement is readily accessible during and after construction. It also never hurts to add more electric vehicle spaces as more and more people invest in EVs. IND 2-1

Jason Sleisenger

[redacted]

## IND 2 Jason Sleisenger

**IND 2-1** Metro appreciates the commenter's preference for maintained access to EV chargers during construction and addition of electric vehicle spaces. No access restrictions to any of the EV charging stations in the Metro Headquarters Building would occur during construction of the Build Alternative or Build Alternative Design Option. Addition of new EV charging stations is not proposed as part of the Build Alternative or Build Alternative Design Option because they are not required to fulfill the provisions of the purpose and need.

**Name:** Bernard Niesen

**Date Received:** 06/21/24

**Format Received:** Email

This is a historic landmark and every effort needs to be made to preserve it!

What changes are necessary, do so without altering its appearance!! IND 3-1

Sincerely,

Bernard Niesen

## IND 3 Bernard Niesen

**IND 3-1** Metro appreciates the commenter's expressed concern for preservation of historical elements of LAUS.

The Build Alternative Design Option was developed based on new information from public comments received during the 45-day public comment period related to historic preservation, comments from the SHPO and consulting parties as part of the Section 106 process related to historic preservation of LAUS, and new information from the engineering design process that provide opportunities to reduce the size of proposed infrastructure, avoid and reduce the magnitude and intensity of environmental effects as compared to the Build Alternative, and reduce cost in a manner that would still allow Metro to meet all provisions of the purpose and need.

The proposed design is intended to avoid, reduce, or minimize impacts to key character-defining features of LAUS. The Build Alternative or Build Alternative Design Option do not include modifications to architecturally significant buildings and spaces that comprise the west side of LAUS, including the passenger waiting area, former ticketing room, Harvey House restaurant, and courtyards. Unfortunately, without some modifications to LAUS, physical constraints prevent the Build Alternative or Build Alternative Design Option from being implemented. Therefore, Mitigation Measure CUL-2 requires preparation and

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| | implementation of a Built Environment Treatment Plan (BETP) that details the specific actions Metro would take to resolve adverse effects on built environment historic properties, including the portion of LAUS that would be affected. The BETP would include provisions for the restoration of the existing LAUS passenger concourse to its 1939 appearance in accordance with the Secretary of the Interior's Standards for Restoration, where feasible, from an engineering and constructability standpoint. Mitigation Measure CUL-2 also requires Metro to assess the feasibility of salvaging significant architectural details from character-defining features of LAUS slated for demolition, including but not limited to portions of butterfly shed canopies and platform lettering, for incorporation into an educational display. Mitigation Measure CUL-2 also requires Metro to prepare documentation to Historic American Buildings Survey standards for any character-defining features of LAUS that are proposed for demolition or alteration. |

**Name:** Mark Baker, Soft Lights Foundation

**Date Received:** 06/21/24

**Format Received:** Email

Dear Carlos Montez, Deputy Executive Officer, Los Angeles Metro, Please find attached our public comment. IND 4-1

Sincerely,
Mark Baker
President
Soft Lights Foundation
www.softlights.org
mbaker@softlights.org

## IND 4 Mark Baker

**IND 4-1** It is noted that the commenter's public comment is contained in an attachment. Please see response below.

Soft Lights Foundation

9450 SW Gemini Drive
PMB 44671
Beaverton, OR 97008

June 21, 2024

**BY EMAIL**

Carlos Montez, Deputy Executive Officer
Los Angeles Metro
LinkUnionStation@metro.net

**Re: Notice of ADA Requirements and Dangerous Conditions – Light Emitting Diodes**

Dear Carlos Montez,

This is a public comment on the Draft EIS/SEIR for the Link Union Station. This letter serves to provide Constructive Notice that the use of Lighting Emitting Diodes in parking lot lighting, displays and signs, indicator lights, and interior lighting can create dangerous conditions and discriminatory barriers. LED lights have been proven to impair vision and cognitive functioning and can cause non-epileptic and epileptic seizures. The US Food and Drug Administration has not vetted LED lights for photobiological, neurological, or psychological safety. LED lights are unregulated and create hazardous, dangerous, and discriminatory conditions. IND 4a-1

The US Department of Energy states that LEDs are a "radically new technology" that emit a "directional" light with "unique characteristics".[1] It is the directional nature of LEDs and their unique characteristics that make LEDs unsuitable for most lighting applications because of the dangerous conditions and discriminatory barriers that LED lights create. IND 4a-2

California Government Code Section 835 states: IND 4a-3

*Except as provided by statute, a public entity is liable for injury caused by a dangerous condition of its property if the plaintiff establishes that the property was in a dangerous condition at the time of the injury, that the injury was proximately caused by the dangerous condition, that the dangerous condition created a reasonably foreseeable risk of the kind of injury which was incurred, and that either:*

*(a) A negligent or wrongful act or omission of an employee of the public entity within the scope of his employment created the dangerous condition; or*

*(b) The public entity had actual or constructive notice of the dangerous condition under Section 835.2 a sufficient time prior to the injury to have taken measures to protect against the dangerous condition.*

[1] https://www1.eere.energy.gov/buildings/publications/pdfs/ssl/ssl_lessons-learned_2014.pdf

1 of 2

## IND 4 Mark Baker (Attachment)

**IND 4a-1** LED lights are commonly used in the built environment, transit stations, and public spaces and generally offer energy efficiency and improved visibility.

Metro reviewed the DOE Report referenced by the commenter and concluded the document is an early assessment of the LED general illumination market. Furthermore, Metro reviewed several recent studies that provide evidence that provide evidence contrary to the commenters' assertions regarding the dangers of LED lights.

*Lighting Research & Technology* in 2021 discussed the impact of different types of lighting on cognitive performance. It found no significant evidence that LEDs, in normal usage, impair cognitive functions. It noted that proper lighting might even improve performance in certain settings.

*Journal of Light & Visual Environment* (2021) studied the potential health risks associated with LED flicker. The article concluded that LED technology is designed to minimize flicker, making the overall risk extremely low

Impacts from direct lighting and glare are discussed in Draft EIS/SEIR Section 3.4. As described in that section, Mitigation Measure AES-3 would be implemented during final design, which requires that all new or replacement lighting comply with *Metro Rail Design* (Metro 2013), SCRRA *Design Criteria Manual* (SCRRA 2014), CHSRA design

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| | criteria, Illuminating Engineering Society standards, maximum allowable CALGreen glare ratings (CBC 2013 – Title 24, Part 11), and LEED® standards for new construction. As part of the process to implement Mitigation Measure AES-3, Metro would apply the following best practices during the architectural design of proposed infrastructure:<br>• LED lighting would be installed facing downward to protect the night sky, prevent a direct view into the light fixture, and to prevent dirt accumulation on the lighting lens<br>• LED lighting would be attached properly to minimize potential for flicker<br>• LED lighting fixtures would be concealed to the extent practicable and placed in a location to illuminate a surface rather than a direct source<br>• Avoid fixtures that project fast moving light or images, or fixtures that are overly bright scenes to avoid distraction<br>• In addition, all permanent lighting will be designed to be directed away from residential units. Screening elements, including landscaping, will also be incorporated into the design, where feasible. Low-reflective glass and materials will also be incorporated into the design of the new canopies to reduce daytime glare impacts.<br><br>**IND 4a-2** Metro reviewed the DOE Report and concluded the document is an early |

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| | assessment of the LED general illumination market.<br><br>Please refer to the Comment IND 4a-1 response for a discussion of LED lights. As discussed in that response, LED lights are commonly used in the built environment, transit stations, and public spaces and generally offer energy efficiency and improved visibility. Impacts from direct lighting and glare are discussed in Draft EIS/SEIR Section 3.4. As described in that section, Mitigation Measure AES-3 would be implemented during final design, which would require that all new or replacement lighting comply with *Metro Rail Design* (Metro 2013), SCRRA *Design Criteria Manual* (SCRRA 2014), CHSRA design criteria, Illuminating Engineering Society standards, maximum allowable CALGreen glare ratings (CBC 2013 – Title 24, Part 11), and LEED® standards for new construction. |

28 C.F.R. § 35.151(a)(1) states:

*Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities, if the construction was commenced after January 26, 1992.*[2]

28 C.F.R. § 35.151(b)(1) states:

*Each facility or part of a facility altered by, on behalf of, or for the use of a public entity in a manner that affects or could affect the usability of the facility or part of the facility shall, to the maximum extent feasible, be altered in such manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992.*

IND 4a-3 Contd.

Here is a sampling of reports of neurological, psychological, and physical injury caused by LEDs:

- Minnesota Department of Human Rights – LED RRFB – (https://www.softlights.org/wp-content/uploads/2023/06/74059-6-15-2023-ECP-Memorandum-.pdf)
- LED RRFB – Seizure / Concussion - (https://www.softlights.org/wp-content/uploads/2022/09/MA-Incident-Report.pdf).
- Emergency Vehicle – Seizure Reaction / Panic Attack - (https://www.softlights.org/wp-content/uploads/2021/09/Encounter-with-Emergency-Vehicle.pdf)
- LED Incident Reports - (https://www.softlights.org/led-incident-reports/)

IND 4a-4

On May 24, 2024, the US Food and Drug Administration issued a decision to not publish performance standards for any LED product, despite the requirements of 21 U.S.C. 360ii. Thus, given the numerous reports of harm and discrimination caused by LED lights and the lack of regulation from the FDA, it will be incumbent on Los Angeles Metro to vet any proposed LED product to ensure that the directional nature and unique characteristics of the LED product do not create a dangerous condition and that the installation of an LED device does not make a constructed or altered area not readily accessible or usable by individuals with disabilities.

IND 4a-5

The impacts of LED lighting must be addressed in the EIS/SEIR.

Sincerely,

/s/ Mark Baker
President
Soft Lights Foundation
mbaker@softlights.org

[2] https://www.law.cornell.edu/cfr/text/28/35.151

2 of 2

**IND 4a-3** The proposed concourse-related improvements are designed to improve ADA accessibility while meeting all applicable California Building Code and National Fire Protection Association 130 Standards for Fixed Guideway Transit Systems. Please also refer to the Comment IND 4a-1 response for a discussion of LED lights. As discussed in that response, LED lights are commonly used in the built environment, transit stations, and public spaces and generally offer energy efficiency and improved visibility. Impacts from direct lighting and glare are discussed in Draft EIS/SEIR Section 3.4, Visual and Aesthetics. As described in that section, Mitigation Measure AES-3 would be implemented during final design, which requires that all new or replacement lighting comply with *Metro Rail Design* (Metro 2013), SCRRA *Design Criteria Manual* (SCRRA 2014), CHSRA design criteria, Illuminating Engineering Society standards, maximum allowable CALGreen glare ratings (CBC 2013 – Title 24, Part 11), and LEED® standards for new construction. Mitigation Measure AES-3 applies to the Build Alternative and the Build Alternative Design Option.

**IND 4a-4** The commenter's citations regarding reports of effects to human health and safety from LED lights is noted. Please also refer to the Comment IND 4a-1 response for a discussion of LED lights. As discussed in that response, LED lights are commonly used in the built environment, transit stations, and public spaces and generally offer energy

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| | | efficiency and improved visibility. Impacts from direct lighting and glare are discussed in Draft EIS/SEIR Section 3.4, Visual and Aesthetics. As described in that section, Mitigation Measure AES-3 would be implemented during final design, which requires that all new or replacement lighting comply with *Metro Rail Design* (Metro 2013), SCRRA *Design Criteria Manual* (SCRRA 2014), CHSRA design criteria, Illuminating Engineering Society standards, maximum allowable CALGreen glare ratings (CBC 2013 – Title 24, Part 11), and LEED® standards for new construction. Mitigation Measure AES-3 applies to the Build Alternative and the Build Alternative Design Option. |
| | **IND 4a-5** | The FDA's decision to not publish performance standards for LED fixtures is noted. Please refer to the Comment IND 4a-1 response for a discussion of LED lights. As discussed in that response, LED lights are commonly used in the built environment, transit stations, and public spaces and generally offer energy efficiency and improved visibility. Impacts from direct lighting and glare are discussed in Draft EIS/SEIR Section 3.4, Visual and Aesthetics. As described in that section, Mitigation Measure AES-3 would be implemented during final design, which requires that all new or replacement lighting comply with *Metro Rail Design* (Metro 2013), SCRRA *Design Criteria Manual* (SCRRA 2014), CHSRA design criteria, Illuminating Engineering Society standards, maximum allowable CALGreen glare ratings (CBC 2013 – Title 24, Part 11), and LEED® |

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| | standards for new construction. Mitigation Measure AES-3 applies to the Build Alternative and the Build Alternative Design Option. |

**Name:** Amy Wasson

**Date Received:** 06/21/24

**Format Received:** Email

Sent from my iPhone

My first concern with this project, is that there is a legitimate effort to preserve historical elements of this building. The interior aesthetic and architectural elements of Union Station are an important part of our history, that should remain part of the design moving forward. IND 5-1

## IND 5 Amy Wasson

**IND 5-1** The commenter's concern for preservation of historical elements of LAUS is noted.

The Build Alternative Design Option was developed based on new information from public comments received during the 45-day public comment period related to historic preservation, comments from the SHPO and consulting parties as part of the Section 106 process related to historic preservation of LAUS, and new information from the engineering design process that provide opportunities to reduce the size of proposed infrastructure, avoid and reduce the magnitude and intensity of environmental effects as compared to the Build Alternative, and reduce cost in a manner that would still allow Metro to meet all provisions of the purpose and need.

Please refer to the Comment IND 3-1 response for a description of the measures that are required to be implemented to maintain the architectural character of LAUS. As discussed in that response, the proposed design is intended to avoid, reduce, or minimize impacts to key character-defining features of LAUS. The Build Alternative or Build Alternative Design Option do not include modifications to architecturally significant buildings and spaces that comprise the west side of LAUS, including the passenger waiting area, former ticketing room, Harvey House restaurant, and courtyards. Unfortunately, without some modifications to LAUS, physical constraints

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| | prevent the Build Alternative or Build Alternative Design Option from being implemented. Therefore, Mitigation Measure CUL-2 requires preparation and implementation of a Built Environment Treatment Plan (BETP) that details the specific actions Metro would take to resolve adverse effects on built environment historic properties, including the portion of LAUS that would be affected. |

**Name:** Todd Saalman

**Date Received:** 06/21/24

**Format Received:** Email

Greetings.

I would like to read your statement regarding impacts of this project on the LA River Bike Trail.

The train yard has always been an obstacle to connecting the northern and southern sections of the river trail.

A connection would provide cyclists and pedestrians with the long sought after, safe transit way along the downtown segment of the LA River to Atlantic Blvd., making the Trail contiguous from the Valley to Long Beach.

IND 6-1

Will this project address or mitigate this concern?

Thank you for your consideration.

Regards,

Todd Saalman

## IND 6 Todd Saalman

**IND 6-1** Metro is currently preparing an environmental document as part of the LA River Path Project. The project includes a new bicycle and pedestrian path along an approximately eight-mile stretch of the Los Angeles River from Elysian Valley through Downtown Los Angeles to the City of Maywood. There are several proposed access points described in and around downtown Los Angeles in particular at Union Station and Mission Road/Cesar Chavez Avenue.

The Build Alternative Design Option would promote safe bicycle and pedestrian access to and from LAUS and connection points around LAUS. To improve neighborhood connectivity consistent with the Los Angeles River Revitalization Master Plan, River Improvement Overlay (RIO) District guidelines, LAUS Sustainable Neighborhood Assessment, City of Los Angeles Mobility Plan, Metro's LA River Path Project, and Metro's Los Angeles Union Station Forecourt and Esplanade Improvements Project, Mitigation Measure LU-1 includes provisions for Metro, in coordination with the City of Los Angeles, to implement either Class II or IV type bike lanes south of LAUS along Commercial Street from Alameda Street to Center Street. These bike lanes would be constructed in accordance with applicable recommendations from the River Design Guidebook for safe access between the east side of LAUS to the Los Angeles River. If additional funding is identified, a dedicated

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| | bicycle/pedestrian bridge over US-101 could be constructed in addition to the new bicycle lanes described above. Based on the considerations above, the active transportation improvements would support the initiatives raised in the comments related to the LA River Bike Trail. |

**Name:** Robert Frampton, RailPAC

**Date Received:** 06/22/24

**Format Received:** Email

I was able to find the EIS. Its link was hidden behind the popup page that describes the virtual tour of the project. IND 7-1

https://www.linkunionstation.com/virtual-meeting/docs/Volume_I-Draft_EIS-SEIR/Link_US_-_Draft_Environmental_Impact_Statement_Supplemental_Environmental_Impact_Report.pdf IND 7-2

From: Robert Frampton

Sent: Saturday, June 22, 2024 10:15 AM

To: linkunionstation@metro.net <linkunionstation@metro.net>

Subject: "Link US - Draft EIS/SEIR"

Please send me the pdf for the draft EIS/SEIR. The pdf is not available on your website. IND 7-3

Thanks, Robert Frampton, Board of Directors member, RailPAC

## IND 7 Robert Frampton

**IND 7-1** Metro appreciates the comments provided regarding access to the Draft EIS/SEIR web link. The commenter's request to be sent Draft EIS/SEIR PDF appears to be resolved as the commenter was able to access the PDF link.

**IND 7-2** Please refer to the Comment IND 7-1 response.

**IND 7-3** Please refer to the Comment IND 7-1 response. The PDF of the Link US Draft EIS/SEIR is available at: linkunionstation.com.

**Name:** Connor Webb

**Date Received:** 06/25/24

**Format Received:** Email

Hello LinkUS team,

While reviewing the SEIR, I noticed that the proposed changes to the at-grade crossing at N Main St will conflict with a number of upgrades outlined in the Mobility Plan 2035. As far as I can tell, this is not addressed in the document. As an important LA river crossing to improve active transportation access to DTLA (and LAUS itself), I found this to be a fairly egregious oversight. Attached is a full explanation of the conflict with corresponding figures. IND 8-1

Thanks,

Connor Webb

Connor M. Webb (he, him, his)

MD-PhD Candidate

UCLA-Caltech Medical Scientist Training Program

[redacted]

## IND 8 Connor Webb (Email)

**IND 8-1** Please refer to the Comment ORG 1 response. The attachment provided by the commenter is the same attachment provided under Streets for All.

**Name:** Jessica Capuano

**Date Received:** 06/27/24

**Format Received:** Info Line

Hello. Good afternoon. My name is Jessica Capuano. I had a storage unit at, the Union Station storage unit that you guys took over. You guys offered me, payment of $1,250. That will be paid out to me via, the ro monument or ro monument. I moved out three months ago and I have not received a check. I have been in contact with Inez Garcia and the team and Monument Row, and they keep just, either ignoring my messages or saying that they will check in by the end of the week to see if, they received the check from you guys from the Link Union Station Metro project. I have been unemployed. I used my resources to move out of that, storage unit. I had to travel, like to come here, and. Yeah, it was really unfair. So I am trying to escalate this issue and, continue contacting you guys directly to see what is happening. And if you could contact your accounting department to give me a status. My name, as I said, is Jessica Capuano. Phone number is [redacted] Thank you

IND 9-1

## IND 9 Jessica Capuano

**IND 9-1** Metro appreciates the input about relocation cost associated with the storage unit. Metro staff confirmed that the customer's payment was completed on July 1, 2024.

**Comment Number:** IND 10

**Name:** Greg

**Date Received:** 07/02/24

**Format Received:** Email

Hello Metro:

As someone who uses Union Station frequently - usually for Flyaway buses to/from LAX, but eventually we want to try using the trains instead of driving, for visits to/from family in the Temecula area - the first things that pop into my head as possible improvement opportunities: IND 10-1

(1) If you're coming or going via the bus terminal at the back - Flyaway buses, etc - it is a long, long slog through the station either to or from the dropoff / cab / Uber / Lyft stands out front, especially if you've got serious baggage with you. 'Not sure what could be done about that short of putting in airport-style moving sidewalk conveyors in the middle of the concourse under the platforms, but something to think about; IND 10-2

(2) Getting vertically from the bus terminal level down to the station floor level or vice-versa is both scary (depending on time of day) and physically difficult, again especially if you have luggage. The elevator – if there is one? - is well-hidden, so there are times when I've just grit my teeth and lugged everything up (or down,) that long, curving stairway. There should be a new, mega-sized elevator, parked right smack in the middle of everything at that bus terminal side of the building that does not have to be searched for, is well lit, is easy to get to, and is big enough to accommodate a bunch of people with a bunch of baggage. 'Really amazed that this problem still has not been addressed, because every single time I use the bus terminal I have to scratch my head and try to find a way to get down to ground level. I think there's a ramp or something, but memory is hazy and... I'm almost positive I saw an elevator out there once but I might have imagined it. And generally I don't feel a whole lot like doing a lengthy search of the area when I'm lugging a bunch of bags and it's the dead of night; IND 10-3

(3) Cab / Uber / Lyft area designations out front need clear markings – right now nobody knows where they're supposed to go and it's a free-for-all, with station personnel constantly having to tell people "you can't stop here," "you can't park here," etc. If people coming and going in cars actually knew, CLEARLY, where IND 10-4

## IND 10 Greg

**IND 10-1** Metro appreciates the comments provided regarding the Flyaway buses to and from LAX and the intent to use Union Station in the future via its train connection. With the Project, Metro intends to make connections like that easier.

**IND 10-2** The commenter's suggestion to incorporate sidewalk conveyers within the concourse is noted. As discussed in Draft EIS/SEIR Section 2, passenger circulation and accessibility would be improved with new vertical circulation elements (e.g., stairs, escalators, and elevators) that provide improved connectivity from the passenger platforms and the expanded passageway and Patsourous Transit Plaza, where the Flyaway bus is located. The concourse-related improvements would be designed with the appropriate size and relative arrangement of waiting areas, wayfinding and signage, amenities, circulation spaces, and other back of house facilities. These improvements would increase passenger capacity, improve safety and ADA accessibility, and allow for more efficient passenger egress movements to and from the various transit modes at LAUS, including passenger vehicle pick-up/drop-off and ride share areas on the west LAUS.

**IND 10-3** As described in Draft EIS/SEIR Chapter 2, the Build Alternative evaluated in the Draft EIS/SEIR would include improved baggage handling operations by providing more efficient and direct routes for drop off and pick

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| | | up of luggage. For passengers, new baggage drop-off locations would be provided, and baggage pick up would occur within the expanded passageway where new carousels would be provided. Additionally, and as discussed in response to comment IND 10-2 above, the Build Alternative evaluated in the Draft EIS/SEIR would include the installation of new elevators and other vertical circulation elements to improve accessibility and passenger luggage handling throughout LAUS, including Patsourous Transit Plaza on the east side of LAUS where the Flyaway bus is located. These concourse-related improvements are also part of the Build Alternative Design Option evaluated in Final EIS Chapter 9, Build Alternative Design Option. |
| | **IND 10-4** | No modifications to the west entrance to LAUS where uber/Lyft drop-offs are proposed as part of the Build Alternative or Build Alternative Design Option. |

* continue his email under "Address"

* Email continued:

(4) 'Need to encourage / incentivize new businesses in the Station, particularly places to eat. Almost every single time I come to the station - especially after a long flight, the slog through the airport and the Flyaway ride back - I'm seriously hungry. But other than that one convenience store roughly in the middle of the concourse there is nothing there but a couple of always-closed restaurants (which look too highdollar- expensive anyway.) Everybody's got their faves but a Five Guys or In-N-Out burger joint, or a good sushi joint, or a genuine street taco joint, or an Indian joint that sells biryani hot enough to make your forehead sweat and your eyes water and your nose run, or a Japanese joint that sells some serious soba and udon and ramen, or a good genuine Thai joint, or genuine Szechuan joint, or whatever. The possibilities are endless, but currently options for eating at Union Station are pretty paltry. I'm thinking if there were a good selection of interesting eateries at Union Station, it could become a kind of night-spot destination for "foodies" too, along with just hungry travelers. But then I suppose you'd need significantly more parking, like making that little lot out front a quad- or quint-level structure. Actually that's needed anyway, so make this #5; IND 10-5

(5) Some simple short-term parking out front, so people who've come to pick someone up have a place to park while they wait. I'm thinking since dropping someone off is momentary, parking for that isn't needed - but it's a whole different thing when you're picking someone up. And when it's a long, exhausting slog from the bus terminal through the station after you've arrived, a little difficult to time it perfectly enough to eliminate the need for your ride to wait. And waiting needs parking. Currently parking availability out front is next to nil, so more is needed. IND 10-6

That's a wrap for me. Thanks for listening and 'hope the ideas are worth consideration. IND 10-7

Cheers,

Greg (グレグ / gu-re-gu) in LA

**IND 10-5** Comment suggestion for incentives to attract new businesses at LAUS is noted. The proposed concourse-related improvements include up to 160,000 square feet of transit-serving retail amenities, which would include dining. While no incentive programs are planned at this time, opportunities to lease retail and dining spaces at LAUS will be available following construction.

**IND 10-6** The commenter's preferences are noted. The Build Alternative or Build Alternative Design Option do not include any new parking areas or modifications to existing parking areas. The Draft EIS/SEIR Section 3.3, Table 3.3-10 includes an inventory of existing parking in the study area. As shown on Table 3.3-10, 275 parking spaces exist on the roadways nearest to LAUS. No changes to the parking analysis would result from the Build Alternative Design Option.

**IND 10-7** Metro appreciates the ideas shared, and all comments and suggestions are taken into consideration.

**Name:** Jay Chen

**Date Received:** 07/08/24

**Format Received:** Email

Here are my comments on the EIR:

1. Instead of building multiple lines over the 101 freeway at great expense and disruption, why not develop the spur that branches off of the main line and heads south along the west bank of the LA river, and crosses under the 101 freeway, and connects to the same mainline tracks this project is trying to reach? Much less disruptive to what is already one of the most congested freeways in Los Angeles. IND 11-1

2. If this project is pursued and rail is going to be built over the 101 freeway (likely destroying the brand new bus stop that was built above the 101), then the City of LA should concurrently build the freeway cap//public park that has been discussed for years, like the ones pursued in Dallas and Pittsburgh. Let's get it right the first time. Remember when the Gold Line was finally finished in 2007, and then 7 years later it was torn up for the Regional Connector? That's a waste of taxpayer dollars and bathed the community in perpetual dust and vibration. If you're already capping part of the freeway for a train, cap the rest for a park. IND 11-2

3. Ridership will never return if security is not addressed. You can build as many shiny new lines as you want, but if the train stations are health and safety hazards and you have mentally unstable people and outright criminals roaming the lines, no one is going to use the trains. It will be a huge waste of money. Secure the lines. Los Angeles is the only major city I've been to where it seems like you practically invite fare evasion on public transit. The lack of turnstiles in certain stations makes zero sense and it invites trouble. IND 11-3

Jay Chen

## IND 11 Jay Chen

**IND 11-1** The commenter's suggested alternative solution to implementing Link US improvements is noted. NEPA requires that an EIS "rigorously explore and objectively evaluate all reasonable alternatives" and "devote substantial treatment to each alternative considered in detail so that reviewers may evaluate their comparative merits" (40 Code of Federal Regulations Section 1502.14). CHSRA and Metro developed a reasonable range of alternatives to meet the Project's purpose and need. An analysis of alternatives considered as well as a discussion of alternatives considered but eliminated from detailed analysis is provided in Draft EIS/SEIR Chapter 2.0, Alternatives and Design Options Considered Section 2.1 and in Draft EIS/SEIR Appendix B, NEPA Alternatives Evaluation Memorandum. Draft EIS/SEIR Appendix B, *NEPA Alternatives Evaluation Memorandum* also discusses screening criteria for each of the alternatives considered. The commenter's suggested concept would not meet the purpose and need. The analysis of each of the alternatives within Draft EIS/SEIR Chapter 2.0 Appendix B, *NEPA Alternatives Evaluation Memorandum* demonstrates that CHSRA and Metro fully considered a reasonable range of alternatives to meet the purpose and need of the Project. In the Final EIS, the Build Alternative Design Option as well as other alternatives with 8 run-through tracks were further reconsidered as discussed in Chapter 9 of the Final EIS.

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| | **IND 11-2** The Link US Project does not preclude the City of Los Angeles and Caltrans from implementing the Park 101 Project that includes a freeway cap west of the Project Study Area. The Link US Project does not include a freeway cap because this type of community feature is not required to meet the purpose and need for the Project. As discussed in Draft EIS/SEIR Section 3.5 and Draft EIS/SEIR Appendix G, Air Quality and Global Climate Change Assessment, Mitigation Measure AQ-1 and Malabar Yard Mitigation Measure AQ-1 require regular watering or other dust preventive measures to be implemented during construction to minimize adverse effects from dust during construction. Mitigation Measure AQ-1 applies to the Build Alternative and the Build Alternative Design Option.<br><br>**IND 11-3** Safety and security measures are employed within and around LAUS through interdepartmental coordination between Metro Police, Los Angeles County Sheriff's Department, and the City of Los Angeles Police Department, which are discussed in more detail in Draft EIS/SEIR Section 3.14, Safety and Security, Pages 3.14-10 – 3.14-11. The safety and security of other Metro lines and stations and other regional/intercity rail trains or that are operational outside of the Project Study Area are outside of the scope of the Project and Draft EIS/SEIR analysis. |

**Name:** Layla Porter

**Date Received:** 07/09/2024

**Format Received:** Online Comment Form

The public has not been presented with any data or findings from a report that indicates LAUS will experience an influx in ridership. In fact, Metro ridership is and HAS BEEN DECLINING due to a failure to address safety, cleanliness, and scheduling issues. This project was also initially greenlit by an infamous convicted felon/politician who sold out the constituents in his district in order to reap personal financial rewards. IND 12-1

The effort put forth towards engaging actual members of the surrounding community has been MINIMAL mostly seniors and lower income adults residing in the project area and yet no free public parking was provided. some households on my block never even received notice of this meeting today because only ONE pamphlet was delivered per household-despite several residences on my block with co-owners. IND 12-2

State agencies should NOT green light project this without a more invested and long term community engagement process that is inclusive of actual members of the community- not corrupt politicians and their community based organizations of choice. IND 12-3

## IND 12 Layla Porter

**IND 12-1** In June 2024, Metro saw its 19th consecutive month of year-over-year ridership growth with 25,181,475 boardings on its bus and rail services, reaching 85.5 percent of its June 2019 pre-COVID ridership level. With 18,792,300 boardings on weekdays, ridership reached 82.1 percent of its pre-pandemic levels. Weekends in June 2024 saw 6,389,175 boardings, reaching 97.7 percent of pre-pandemic weekend ridership from June 2019. As traffic congestion returns, the demand for bus and rail transportation is expected to increase further, highlighting the importance of the Project in supporting regional mobility.

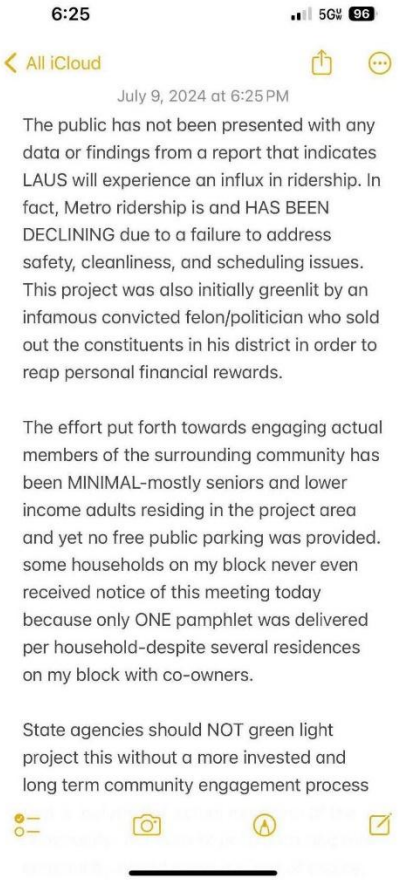
A summary of the recent ridership projections are located on Metro's website here: https://www.metro.net/about/la-metros-ridership-continues-upward-trend-in-june-marking-the-19th-consecutive-month-of-year-over-year-growth/

Contrary to the comment's assertions, the most applicable population, growth, and travel demand projections for the Project are the anticipated passengers per day and train trips through LAUS that result from LAUS being a regional transfer point for train riders in the six-county Southern California Association of Governments (SCAG) region and throughout Southern California. Passenger trips through LAUS each weekday is expected to increase from 110,000 passengers per day to approximately 200,000 passengers per day

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| | | by 2040 (Metro 2015a). As discussed in Draft EIS/SEIR Chapter 1, Section 1.4.2, as early as 2040, estimated daily regional/intercity rail service train movements (revenue and nonrevenue regional/intercity trains) through LAUS are forecasted to increase from 233 trains per day in 2016 to 830 trains per day in 2040, an increase of 256 percent. When HSR trains are added, estimated train movements through LAUS are forecasted to increase in 2040 by 372 percent with the addition of up to 272 HSR trains per day through LAUS.<br><br>Long-term population growth in Los Angeles County and the City of Los Angeles is expected to increase by 13 and 18 percent, respectively, through 2045. As discussed in Draft EIS/SEIR Chapter 1, the need for the Project is generated in part by this increase in regional population. Localized operational, safety, and accessibility upgrades in and around LAUS will be required to meet existing demand and this future growth. Actions of previous politicians are outside the scope of the Draft EIS/SEIR. |
| | **IND 12-2** | Several applicable regulations and executive orders require agencies to seek public involvement, and Metro met and exceeded each of those requirements. Applicable NEPA regulations require agencies to "[m]ake diligent efforts to involve the public in . . . implementing their NEPA procedures," and "to inform those persons and agencies who may be interested or affected. 40 C.F.R. 1506.6(a), (b). FRA regulations also require consultation with the public. |

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| | Draft EIS/SEIR Appendix R2, *Link US Public Outreach Plan,* summarizes demographics in the study area, identifies community group stakeholders, and identifies low-income and limited English proficiency populations. It also describes the multiple platforms used for communication throughout the environmental process. As described in Appendix R2, Project outreach methods included a variety of formal and informal outreach methods, such as in-person and virtual public meetings, key stakeholder and community group briefings, Project development team and agency coordination meetings, advertisements, email blasts, mailings, pamphlet distribution, website updates, and social media engagement.<br><br>The outreach activities discussed in Appendix R2 demonstrate that Metro and CHSRA met and exceeded legal requirements regarding responsibilities to engage and meaningfully involve all affected communities, including low-income communities, in the public decision-making process. See also the response to IND 12-3 for further information on continuing outreach during final design and project implementation.<br><br>Metro encourages the use of alternative modes of transportation such as ride share and public transportation for visitors traveling to Metro Headquarters but understands that this may be impractical, and some trips must be completed using an automobile. Metro can provide parking validation for authorized |

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| | events such as a Metro project public hearing. |
| | **IND 12-3** The commenter requested a longer engagement process is noted. As described in Appendix R2, *Link US Public Outreach Plan* and in response to comment IND 12-2 above, Metro and CHSRA have pursued and will continue to pursue the outreach activities in a manner to promote participation from all populations in the environmental review process. Metro and CHSRA are in receipt of the comments provided on the Draft EIS/SEIR and will be in contact with affected property owners, community members, and stakeholders to discuss project concerns and consider methods to address concerns identified. |




## IND 12 Layla Porter (Attachment)

**IND 12a-1** Please refer to the Comment IND 12-1 response regarding population, growth, and travel demand projections.

**IND 12a-2** Please refer to the Comment IND 12-2 response regarding Metro's efforts to maximize meaningful engagement, public participation, and access to information.

**IND 12a-3** Please refer to the Comment IND 12-3 response regarding community engagement.

**Name:** Greg Heet

**Date Received:** 07/10/24

**Format Received:** Email

Hi Vincent,

It's been a couple of years. I hope you are still there. I have two questions.

1. Am I still NOT in the construction area. My address

611 Ducommun Street

Los Angeles, CA 90012

IND 13-1

2. Did they address the squealing wheel concern we talked about in 2021? See below.

IND 13-2

Thanks for your help.

Greg Heet

Heet Sound Products

611 Ducommun Street

Los Angeles, CA 90012

## IND 13 Greg Heet

**IND 13-1** 611 Ducommun Street property is outside of the Project Footprint for the Build Alternative and Build Alternative Design Option but would be affected by construction detours.

**IND 13-2** If rail operators determine there is a frequent occurrence of wheel squeal on the run through tracks over US-101 squeal, track lubricant could be applied to reduce noise from wheel squeal.

**Comment Number:** IND 14

**Name:** Mario Dominguez Jr.

**Date Received:** 07/12/2024

**Format Received:** Online Comment Form

I am not in favor of this Link Union Station project being done. My first question to the folks at Metro is, Is this project even necessary? My second question to Metro is, Who is asking and demanding for this project? Who's pushing for this project to be done? I think this is an unnecessary project. And I want the funds for this project to be redirect to other Metro projects that are currently in development. This Link Union Station project is a bad idea. This project is a perfect example of how Metro is completely out of control as an organization. Metro has way too many projects currently in development. Projects that are short on funding. Projects that could greatly benefit from the funds that are going to be used for this Link Union Sation project. Metro is truly a scattered mess. IND 14-1

I'll give you two examples of projects that should receive the funding that is going towards this Link Union Station project. 1)High speed rail. Why isn't the $950 billion dollars for this Link Union Station project going towards building the high-speed rail project that we all voted for in the last decade? We should have that project by now. That should be the number one focus of Metro right now. IND 14-2

The high-speed rail project should supersede everything else that Metro is currently doing. Give us our high-speed rail. The second project that would benefit tremendously from the funds that are going towards this Link Union Station project is the Southeast Gateway Line formerly known as the West Santa Ana Transit Branch Rail Line. This project is only partially funded for the southern segment of the line. Which is 14 miles long. But the northern segment has no funding. And mind you the northern segment is meant to connect the southern segment and end at Union Station. IND 14-3

Instead of pouring money into building and completing these two major consequential projects, Metro is too busy dreaming up projects that nobody is asking for. Why? Why waste money on this Link Union Station project when you really should be focused on these two other projects? I want Metro to halt pursuing and developing the Link Union Station project. I want Metro to divest the whole $950 billion dollars that is going to be used for the Link Union Station project. And invest it into either the high-speed rail project or the Southeast Gateway Rail line project. This is an outrage. Metro should be ashamed of themselves for having dreamt up the Link Union Station project without having IND 14-4

## IND 14 Mario Dominguez Jr.

**IND 14-1** The commenter's opposition to the Project is noted. As discussed in Draft EIS/SEIR Chapter 1, the need for the Project is generated by the forecasted increase in regional population and employment; implementation of federal, state, and regional transportation plans that provide for increased operational frequency for regional and intercity trains; and introduction of the planned HSR system in Southern California. Localized operational, safety, and accessibility upgrades in and around LAUS will be required to address existing capacity constraints and plan for future growth at LAUS. CHSRA and Metro are the lead agencies for the Project.

Metro appreciates the commenter's preferences on its priorities. Funding priorities for transit projects are determined through a structured government planning process for allocating funds for set transportation goals. Information regarding prioritization of transit funding is not available and is outside the scope of the Draft EIS/SEIR.

first completed these two other projects that we've all been waiting for. I am shocked and appalled that the Link Union Station project has made this far into development. You all need to kill this shit. And you need to kill it fast. I do not want Metro to go any further with the Link Union Station project. I urge the Metro Board of Directors to terminate this Link Union Station project. And divest the funds aimed towards it. To be invested into the high-speed rail project. Or the Southeast Gateway Rail Line. These two projects should be the primary and central focus for Metro to pursue building. Everything else is inconsequential in comparison to these two. This is my plea to Metro and the Metro Board of Directors. Thank you for reading this.

IND 14-4 Contd.

**IND 14-2** The Project advances future implementation of the planned HSR system by CHSRA, and the Draft EIS/SEIR includes an analysis of the environmental impacts of the HSR-system facilities that are physically accommodated for within this Project footprint. Contrary to the commenter's suggestion, Metro is focusing on working with the CHSRA to advance that project. As noted in Draft EIS/SEIR Chapter 2, Section 2.3, Page 2-27, LAUS is located between the Burbank to Los Angeles and Los Angeles to Anaheim Project Sections of the planned HSR system, and the Project footprint accommodates the design and location where HSR infrastructure improvements would be located. The limits of HSR accommodation for the Build Alternative are shown on Figure 2-2 in Final EIS Chapter 2.0, Alternatives and Design Options Considered, Page 2-31. The limits of HSR accommodation for the Build Alternative Design Option are shown on Figure 9-3 in Final EIS Chapter 9.0, Build Alternative Design Option, Page 9-21.

**IND 14-3** Please refer to the Comment IND 14-1 response regarding the funding allocation process for transit projects and Response IND 14-2 regarding accommodation of the planned HSR system through the Project limits. The SE Gateway Line (previously West Santa Ana Branch Line) was considered in the Draft EIS/SEIR, Section 3.16, Table 3.16-2 (#9).

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| | **IND 14-4** Metro appreciates the commenter's opposition to the Project and preferred priorities. Please see Comment IND 14-2 response for an explanation of how the Project accommodates the future implementation of the planned HSR system through the Project limits. |

**Comment Number:** IND 15

**Name:** Mario Dominguez Jr.

**Date Received:** 07/16/2024

**Format Received:** Info Line

Hello. My name is Mario Dominguez Jr. 'm a resident of South Gate. I was hoping to speak with Carlos Montez, Deputy Executive Officer, to the Link Union Station project. I have some questions I'd like to ask Mr. Montez. My phone number is area code [redacted]. Again, [redacted]. Putting a request to speak with Carlos Montez, Deputy Executive Officer for the Link Union Station project. My name is Mark Dominguez Jr., resident of South Gate. Thank you. IND 15-1

## IND 15 Mario Dominguez Jr.

**IND 15-1** This correspondence is a message for Metro staff, not related to the Draft EIS/SEIR. Metro staff has contacted the individual as requested.

**Comment Number:** IND 16

**Name:** Joshua Dungca

**Date Received:** 07/09/24

**Format Received:** Comment Card

Link US must be built. Must be high priority to improve capacity and service. The transportation benefits supersede the cost and negative externalities. Electrify Metrolink

IND 16-1

## IND 16 Joshua Dungca

**IND 16-1** The commenter's support for the Project is noted. As identified in Draft EIS/SEIR Section 3.5, Mitigation Measure AQ-3 does require implementation of emerging technologies for trains using LAUS if pollutant emissions and diesel pollutant concentrations are projected to exceed the SCAQMD thresholds. Mitigation Measure AQ-3 applies to the Build Alternative and the Build Alternative Design Option.

The Build Alternative and Build Alternative Design Option does not preclude future overhead catenaries to support electrified trains through the Project limits because operators are currently using diesel trains. It should be noted that Metrolink, Amtrak, and CHSRA, as the rail operators through LAUS, would be responsible for the purchase and operation of electrified trains that move through Project limits.

**Comment Number:** IND 17

**Name:** William Dennis Nahl

**Date Received:** 07/09/24

**Format Received:** Comment Card

Please do not value engineer this project. Link US has one chance to be a bold project that creates huge increase in capacity from our regional rail system. Don't waste the chance! IND 17-1

## IND 17 William Dennis Nahl

**IND 17-1** As disclosed in Draft EIS/SEIR Chapter 2, the Build Alternative evaluated in the Draft EIS/SEIR is based on a screening process consisting of 14 track alignment alternatives and 6 concourse concepts described in detail in Draft EIS/SEIR Appendix B, *NEPA Alternatives Evaluation Memorandum and Engineering Plans*. The screening process included design considerations for engineering feasibility, safety, community preferences, and optimization of LAUS spaces. As with any large infrastructure project, some value engineering may occur to optimize the design, construction or operations in alignment with a limited available budget.

The Build Alternative Design Option was developed based on new information from public comments received during the 45-day public comment period related to historic preservation, comments from the SHPO and consulting parties as part of the Section 106 process related to historic preservation of LAUS, and new information from the engineering design process that provide opportunities to reduce the size of proposed infrastructure, avoid and reduce the magnitude and intensity of environmental effects as compared to the Build Alternative, and reduce cost in a manner that would still allow Metro to meet all provisions of the purpose and need.

**Comment Number:** IND 18

**Name:** James Kiehl

**Date Received:** 07/16/24

**Format Received:** Email

Dear Mr. Montez and Link US team:

My name is James Kiehl, I live in the Glassell Park neighborhood of Los Angeles for the last 25 years. I attended the open house and public comment meeting on 7-9-24. Your team did a good job and the meeting was quite informative. IND 18-1

As a back ground I personally am a strong supporter of mass transit and regularly follow both Metro and California High Speed Rail as both move forward to build out their systems. Electrification of transportation including trains is a good goal for cleaner air in the Los Angeles basin and California as well. IND 18-2

My concerns deal with apparent at grade crossings at North Main Street and the proposed Malabar Yard Railroad Improvements. At grade crossings are a safety hazard and cause slow downs for both the train traffic and the motor vehicles using the street.

Proposed improvements at North Main Street to eliminate train horns are a nice start but this just is not enough to improve this location fully and improve train speeds. IND 18-3

The proposed Malabar Yard Railroad Improvement does not appear to be fully thought out. Running more trains through central Vernon will increase idling and wait times for cars and trucks on the streets of Vernon. It was suggested at the meeting that the locomotion of the trains be powered by electricity rather than diesel. It is a good goal to move to electricity power. However, a long train stopping traffic on various streets regardless of power source (for the train) will cause cars and trucks to idle and this will cause a significant increase in pollution near the lungs of Vernon residents and day time workers. Please note doing studies of pollution effects at night will not reflect the actual harm given the huge difference between the day time and night time population of Vernon. IND 18-4

## IND 18 James Kiehl

**IND 18-1** Metro appreciates the commentor's participation and comments.

**IND 18-2** The commenter states support for mass transit and suggests electrification of transportation as a "good goal for cleaner air" in the region. As identified in Draft EIS/SEIR Section 3.5, Air Quality and Global Climate Change, Pages 3.5-41 – 3.5-42, Mitigation Measure AQ-3 requires Metrolink, Amtrak, and LOSSAN Rail Corridor Agency to implement emerging technologies for trains using LAUS if pollutant emissions and diesel pollutant concentrations are projected to exceed the SCAQMD thresholds. Metro is required to coordinate with regional rail/intercity rail operators to incorporate these emerging technologies into existing and/or future funding and/or operating agreements to reduce locomotive exhaust emissions in the Project study area. Electrified trains are one type of emerging technology that could be implemented as part of this mitigation measure. Mitigation Measure AQ-3 applies to the Build Alternative and the Build Alternative Design Option.

**IND 18-3** As discussed in Draft EIS/SEIR Chapter 2, Page 2-84, Metro projects increased train movements through the North Main Street crossing. Therefore, it is coordinating with the City of Los Angeles on safety improvements in conjunction with a future quiet zone. Proposed safety improvements to the existing at-grade crossing at North

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| | Main Street (restriping, signals, and pedestrian and vehicular gate systems) are intended to enhance safety at this location when a future quiet zone is implemented. No changes to the train speed at this location would occur upon implementation of the Project, and vehicular travel speeds are expected to remain the same as in the current condition because there is already at-grade crossing railroad infrastructure in place. Therefore, although it would not provide the same benefits as a grade separation, the Project would enhance the safety at that crossing.<br><br>For the 49th Street Closure proposed in the City of Vernon, the closure of the at-grade crossing would eliminate the potential for rail/vehicular traffic to interface. A fence would be installed to separate the railroad ROW from the public roadway at this location; thereby enhancing safety at this existing at-grade crossing. No changes to train speeds would occur upon implementation of the 49th Street Closure and redistribution of traffic is expected on nearby streets.<br><br>For the 46th Street Connector proposed in the City of Vernon, new traffic signals, flashers, gates, new medians, expansion of curb line, sidewalk/ramp, and driveway improvements are proposed at existing at-grade crossings on Pacific Boulevard, 46th Street, and Seville Avenue, and at the new at-grade crossing at Seville Avenue and 46th Street. Potential roadway hazards associated with the new at-grade crossing at Seville Avenue and 46th Street were |

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| | disclosed in the Final EIS Appendix Q Section 3.3, Page 3.3-10. Potential roadway safety devices that may be considered for future implementation (Malabar Yard Mitigation Measure TR-6) include queue cutter traffic signals or pre-signals for the new railroad crossing on Seville Avenue. As discussed in Appendix Q Section 3.14, Page 3.14-24, all Malabar Yard railroad improvements would be designed and constructed to comply with FRA and CPUC standards and specifications to maximize safety for both motorized and non-motorized forms of transportation. No change to the speed of trains would occur.<br><br>As discussed in Draft EIS/SEIR Appendix Q Section 3.3, roadway safety is planned to be maintained with the implementation of Malabar Yard Mitigation Measure TR-6, which would be implemented in coordination with the California Public Utilities Commission and the City of Vernon to maximize effectiveness. Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. |

In the current proposed form, I recommend the EIS/ SEIR not be approved. Please work on these aspects for a better plan for the entire Los Angeles Basin as we all breath the common pool of air.

IND 18-4 Contd.

Sincerely, James Kiehl resident Glassell Park section of Los Angeles 90065

**IND 18-4** Please refer to Comment 18-2 response regarding the electrified trains at LAUS.

The responses below address the comments related to freight railroad operations, vehicle idling and local air pollution for residents and workers.

- Freight Railroad Operations - Key Issue Response #2 includes clarifications to the information presented in the Draft EIS/SEIR Appendix Q Section 2 regarding freight railroad operations. All of the information and analysis of typical freight railroad operational patterns, and the conclusions in the Draft EIS/SEIR are based on a combination of historical data, stakeholder input, and expert analysis. The information collected from BNSF as it relates to the affected train routes, train lengths, consolidated freight operations, and reduced train frequencies is summarized in Key Issue Response #2. As shown in Table 2 of Key Issue Response #2, 8 daily train movements occur on the affected routes considered (Figure 7), and in the future condition, a total of 4.85 daily train movements would occur on these same affected routes (Figure 8). As shown in Table 2, the total daily frequency of train movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night. Figures 7 and 8 depict the existing and future daily train movements on the affected routes.

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| | • Vehicle Idling and Local Air Pollution - Please refer to Key Issue Response #3 for a discussion related to the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4. The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's |

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| | implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>Commentor implies that air quality studies were conducted only during nighttime hours and that air pollution is worse at night in the City of Vernon. However, nighttime air pollution studies were not performed for this project. The air quality evaluation is based upon traffic data that was collected during daytime peak periods where traffic congestion would be highest (i.e., morning and afternoon commuting times). These peak traffic periods result in the highest pollution emissions over a 24-hour period (i.e., worst case). The commentor provides no documentation to support reasoning that air pollution would be worse at night in the City of Vernon.<br><br>Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements and develop solutions that maximize safety, preserve the city's economic vitality, and connectivity to the extent feasible. |

**Comment Number:** IND 19

**Name:** Mario Dominguez Jr.

**Date Received:** 07/17/24

**Format Received:** Info Line

I'm calling in to put in a request to speak with Carlos Montez, Deputy Executive Officer and to ask questions pertaining to the Link Union Station project. So if Mr. Carlos Montez could call me. I appreciate. My name is Mario Dominguez Junior. I'm a resident of South Gat. My phone number [redacted]. Again [redacted]. Asking to speak with Carlos Montez, Deputy Executive Officer and it's pertaining to the Link Union Station project. Thank you very much. IND 19-1

## IND 19 Mario Dominguez Jr.

**IND 19-1** This correspondence is a message for Metro staff, not related to the Draft EIS/SEIR. Metro staff has contacted the individual as requested.

**Comment Number:** IND 20

**Name:** Mario Dominguez Jr.

**Date Received:** 07/18/24

**Format Received:** Info Line

Hello, my name is Mario Dominguez Junior. I'm a resident of South Gate. I'd like to request to speak with Carlos J. Montez, Deputy Executive Officer for these Link Union Station project. I have questions pertaining to the Link Union Station project, and I'd like to speak with Mr. Carlos J. Montez. My phone number [redacted]. Again. [redacted]. Questions pertaining to Link Union Station. And I'm asking to speak with Carlos J. Montez. Again, my name is Mario Dominguez Junior, resident of South Gate. Thank you.

IND 20-1

## IND 20 Mario Dominguez Jr.

**IND 20-1** This correspondence is a message for Metro staff, not related to the Draft EIS/SEIR. Metro staff has contacted the individual as requested.

**Comment Number:** IND 21

**Name:** Frank H Gallo

**Date Received:** 07/19/24

**Format Received:** Online Comment Form

Verifying that the 6th street stop is included in the metrolink planning of the rail along the west side of the river. The advocates for the 6th street stop have worked very deligently at getting the division 20 tunnel widen to accomodate the stop as well as funding to study the EIR for the stop. IND 21-1

Furthermore additional funding was to be released from CD14 to finish the final draft version of the EIR. Please comment on how this is factoring in to this proposal. Thank you. IND 21-2

## IND 21 Frank H. Gallo

**IND 21-1** The Project-related work in the vicinity of the 6th Street bridge would occur on the SCRRA tracks within the SCRRA-owned right of way. The Project would not encroach upon or result in impacts to the Metro tracks where planning is occurring for the 6th Street Stop to the Metro B/D (Red/Purple) Lines.

**IND 21-2** No conflicts with the 6th Street Bridge Project or EIR would occur upon implementation of the Build Alternative or Build Alternative Design Option.

**Comment Number:** IND 22

**Name:** Mario Dominguez Jr.

**Date Received:** 07/19/24

**Format Received:** Info Line

Hello? Yes. I'm calling to put in a request to speak with Carlos Montez. He's the Deputy Executive Officer for the Link Union Station project. My name is Mario Dominguez Junior. I'm a resident of South Gate. Very much would like to speak with Mr. Carlos J. Montez. The Deputy Executive Officer, pertaining to the Link Union Station project. I have a bunch of questions for him. My phone number is [redacted]. Again. [redacted]. My name again is Mario Dominguez, Junior resident of South Gate. Have some questions pertaining to the Link Union Station project. Thank you very much. IND 22-1

## IND 22 Mario Dominguez Jr.

**IND 22-1** This correspondence is a message for Metro staff, not related to the Draft EIS/SEIR. Metro staff has contacted the individual as requested.

**Comment Number:** IND 23

**Name:** Paul Wennberg

**Date Received:** 07/19/24

**Format Received:** Email

Exciting project. Comment about NOx emissions is well taken. Planning should include stub infrastructure for future overhead catenary - if not for Metrolink, certainly will be needed for HSR. IND 23-1

## IND 23 Paul Wennberg

**IND 23-1** The commenter's support for the Project is noted. Extension of the existing stub-end tracks at LAUS is a key component of the Build Alternative and Build Alternative Design Option. In addition, the Final EIS includes an analysis of the physical location of HSR-related infrastructure, which includes overhead catenaries. The Build Alternative and Build Alternative Design Option do not preclude future overhead catenaries to support electrified trains through the Project limits because operators are currently using diesel trains. It should be noted that Metrolink, Amtrak, and CHSRA, as the rail operators through LAUS, would be responsible for the purchase and operation of electrified trains that move through the Project limits.

**Comment Number:** IND 24

**Name:** Mario Dominguez Jr.

**Date Received:** 07/22/24

**Format Received:** Info Line

Hello. My name is Mario Dominguez Junior. I'm a resident of South Gate. I would like to speak with, Deputy Executive Officer Carlos J. Montez. This is regarding the Link Union Station project, and I have some questions for Carlos Montez pertaining to Link Union Station project. I very much would like to speak with him. My phone number [redacted]. Again. [redacted]. My name is Mario Dominguez Junior asking to speak with Carlos J. Montez, Deputy Executive Officer. This is regarding the Link Union Station project. I have some questions for him. Thank you very much. IND 24-1

## IND 24 Mario Dominguez Jr.

**IND 24-1** This correspondence is a message for Metro staff, not related to the Draft EIS/SEIR. Metro staff has contacted the individual as requested.

**Comment Number:** IND 25

**Name:** Justin Wong

**Date Received:** 07/22/24

**Format Received:** Online Comment Form

I think the High Speed Rail should end at Union Station and there should be more service on the Orange County Line. IND 25-1

## IND 25 Justin Wong

**IND 25-1** The commenter's design preferences are noted. As discussed in Draft EIS/SEIR Chapter 2 and Final EIS Chapter 9, the Build Alternative evaluated in the Draft EIS/SEIR and Build Alternative Design Option evaluated in the Final EIS accommodates the planned HSR system through the Project limits and the physical infrastructure as part of the Burbank to Los Angeles and Los Angeles to Anaheim Project Sections of the HSR system. The Build Alternative or Build Alternative Design Option do not include any modifications to the Metro Orange County Line service. However, implementation of the Build Alternative or Build Alternative Design Option would include additional capacity at LAUS for SCRRA to operate more trains on the Orange County Line as part of Metrolink's Southern California Optimized Rail Expansion (SCORE) Program.

**Comment Number:** IND 26

**Name:** Michael Melideo

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

I am the owner of Consolidated Fabricators. We've been in Vernon for 45 years. The nature of my business is at the corner of 49th and Santa Fe is processing large coils of steel with specially made equipment that has foundations that have been in place for some of it 40 years. IND 26-1

That will not survive the move and neither would I at 68 years old. There's no way I can move. IND 26-2

The nature of what we buy, as example today I brought purchase orders 5,000 tons of steel at a time, and the mill that makes that steel, they want to ship it all. That means 25 to 30 loads plus the business we're doing, there's days where we're turning around 45-foot tractor trailers hauling very heavy loads of steel, over 30 loads a day in an hour. IND 26-3

There's no way a cul-de-sac is going to accommodate that, trucks would be backed up down Santa Fe Avenue idling. It will be dangerous, the congestion. IND 26-4

The risk to my employees, I am not at this stage in my career willing to take if unfortunately, this thing goes through, I will close my business. Here to support me, please stand up guys, our six employees with a total of 127 years just with these six people. Okay I have 85 people. Okay. They will lose their jobs, because my plan was to sell my business in the next two years and transition so that they would have a new employer. Because I am ready to retire after 50 years of working full-time and they'd have a new person to go forward. This will not allow the nature of my business in the way trucking is and the place you guys picked to do this, as it is now. We pull into the railroad tracks and back into our backyard to unload the steel coils. IND 26-5

That would be impossible. Let alone, the turnaround. The congestion would be outrageous and it would be dangerous. The pollution with all those idling trucks. It's not doable. My property value will be impacted. I know I'm out of time, but I got one last thing to say. The damages to be on the record, my business is worth $48 million based on my prior service for a similar business, $12 million in property and $10 million in severance, so that's $70 million to be on the record. IND 26-6

## IND 26 Michael Melideo

**IND 26-1** Metro appreciates the input received and the detailed background provided regarding Consolidated Fabricators' longstanding operations at the corner of 49th Street and Santa Fe Avenue in the City of Vernon. Metro recognizes this facility's valuable contributions to the community over the past 45 years. Metro has carefully considered the comments provided regarding the business operations that involve specialized equipment at this facility.

**IND 26-2** In 2020 and 2021, Metro staff collaborated with the commentor/property owner to develop the hammerhead configuration (49th Street Closure Design Option 2) as a means to allow for safe and legal access into and out of the Consolidated Fabricators business with optimal maneuverability for large semi-trucks.

Both design options were evaluated to determine if adequate ingress/egress for large semi-trucks would be maintained using a 65-foot-long "CA Legal" truck turning template. The analysis demonstrated that Design Option 1 could impact ingress/egress or large semi-trucks and Design Option 2 would facilitate optimal maneuverability in and out of the Consolidated Fabricators business (see clarifications made to Final EIS Appendix Q Section 3.3, Topic 3.3-B, Page 3.3-51).

During construction of either design option, temporary access restrictions to a portion of

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| | | Driveway No. 2 and 3 may be required to implement the 49th Street Closure; however, Metro is required implement standard traffic control measures and safety precautions to maintain safe access to adjacent properties while construction occurs (see Malabar Yard Mitigation Measure TR-1). Metro will continue to coordinate with the property owner to refine their parcel-specific conceptual design during the final design and right of way process.<br><br>During the February 3, 2025 meeting conducted onsite with the commentor/property owner, Metro provided exhibits to demonstrate closure and relocation of the Consolidated Fabricators business is not proposed, nor deemed required, as part of the Malabar Yard railroad improvements because the 49th Street Closure would be designed in a manner to allow business access to be maintained. On February 20, 2025, Metro provided two additional preliminary concepts that were developed for review/consideration based on discussions held onsite with the commentor/property owner and their staff. Metro believes the alternative configurations for truck movements on the property would facilitate ongoing business operations. |
| | **IND 26-3** | The commentor is providing background information regarding business operations. |
| | **IND 26-4** | The hammerhead configuration (49th Street Closure Design Option 2) was developed in response to the coordination meetings that occurred in 2020 and 2021 with the |

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| | | commenter and is the preferred design option for the 49th Street Closure.<br><br>The 49th Street Closure Design Option 2 would allow for safe and legal access into and out of the Consolidated Fabricators business and adequate ingress/egress for large semi-trucks would be maintained. In February 2025, Metro met with the property owner and requested to be present during heavy delivery days when trucks are staged along Santa Fe Street to assess the potential for worsening these types of backups. Metro has committed to coordinate further with the property owner to maintain safe, legal, and adequate access for vehicles and large-semi-trucks during construction and throughout operation.<br><br>No new truck trips would be generated throughout operations. Traffic redistribution on Santa Fe Avenue would occur and was considered as part of the traffic impact analysis. Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. |
| | **IND 26-5** | Please refer to the Comment IND 26-2 response for a discussion of why the business is expected to remain operational. As discussed in the Comment IND 26-2 and Comment IND 26-4 responses above, Design Option 2 for the 49th Street Closure would allow for safe and legal access into and out of the Consolidated Fabricators |

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| | | business with optimal maneuverability for large semi-trucks. |
| | **IND 26-6** | The commenter provides background information regarding perceived business value.<br><br>As discussed in Key Issue Response #2, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue – operations, and Fruitland Avenue – operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, the Malabar Yard railroad improvements would not contribute to traffic congestion that would be deemed as dangerous.<br><br>Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard |

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| | railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4. |

**Comment Number:** IND 27

**Name:** Evelyn Davila

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

My name is Evelyn Davila.· I am with ·Consolidated Fabricators, building products division, and we're located in the City of Fontana.· We manufacture steel studs for ·commercial construction, and we get all of our raw materials from ·this division right over here.· So if we proceed with this 49th Street closure, and they go away, eventually we are going to go away as well out in Fontana. So the point that I am trying to make is if we proceed with the 49th Street closure, I know Mario said that it's going to bring ·temporary jobs at the cost of eliminating permanent jobs. I've been employed with Consolidated for 23 years along with 30 other employees over in Fontana who are going to lose their jobs. · I would like you to that into consideration as well. · Thank you.

IND 27-1

## IND 27 Evelyn Davila

**IND 27-1** Metro appreciates the comments provided regarding the potential closure of 49th Street and its potential indirect effects on business and employees in Fontana. Metro has considered the critical role Consolidated Fabricators has in the region as a raw material supplier and business operations in Fontana.

Closure and relocation of the Consolidated Fabricators business is not proposed, nor deemed required, as part of the Malabar Yard railroad improvements because the 49th Street Closure would be designed in a manner to allow business access to be maintained. The hammerhead configuration (49th Street Closure Design Option 2) was developed in response to the coordination meetings that occurred in 2020 and 2021 with the property owner and is the preferred design option for the 49th Street Closure.

The 49th Street Closure Design Option 2 would allow for safe and legal access into and out of the Consolidated Fabricators business and adequate ingress/egress for large semi-trucks would be maintained. The 49th Street Closure Design Option 2 is configured in a manner to maintain the operational viability of businesses like Consolidated Fabricators and, by extension, support the supply chain and jobs dependent on those businesses. Therefore, Metro expects the City of Fontana division will continue to operate.

**Comment Number:** IND 28

**Name:** Jack Klein

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

I am Jack Klein, President of Lean Associates, Los Angeles.· At the number of points I am trying to make regarding the EIR.· The incomplete data as in the 2020 revised ·version of the supplement.· The EIR was when Malabar Yard was incorporated into the concept.· The data gathering during COVID ·pandemic just, like, what's going on in this building, there's limited access to public hearings.· The -- it would result in ·the data does not accurately reflect the normal conditions ·leading to the potential flawed conclusions and the ·recommendations which Malabar Yards and Vernon is used as the ·mitigation measures for all the negative, adverse concerns that ·are going up in LA.· There's no reflection of the impacts --negative impacts from opening up the Malabar Yards. IND 28-1

With all the participation, obviously, it was very limited. ·It restricted community engagement. · Virtual meetings don't fully compensate for the lack of direct community involvement. · The economic concern. In the City of Vernon it's 40,000 employees, there's about 1,500 ·businesses, business owners, over 800 property owners just as ·Consolidated mentioned.· There's a network of connectivity between business (unintelligible) once and another by -- by impacting with ·over 400 cars in the City of Vernon on the Malabar Yards and ·incorporating the Seville, 46th Street rail line.· We will ·bifurcate the city into three.· And we will eliminate all kinds ·of this interaction, this is not only in Vernon but without -- ·within other businesses throughout the community, creating a ·total number of economic concern, 200 permanent jobs here, 40,000 jobs in Vernon will be impacted.· IND 28-2

Health and safety concerns as ·Mike had mentioned, you will have trucks idling in the street. We have LAUSD school which was not open during your study time, not taken into consideration – the health and safety of those folks and overall going back to the resource, IND 28-3

## IND 28 Jack Klein

**IND 28-1** Metro appreciates the comments provided regarding the data and analysis in the Draft EIS/SEIR. The responses below address the comments related to the COVID-19 factor methodology applied to normalize traffic counts and the purpose of the Malabar Yard railroad improvements.

- COVID-19 Factor Methodology - As discussed in Key Issue Response #2, a COVID factor was used to estimated traffic conditions in 2020 without COVID-19. The approach to normalize the traffic count data collected in August 2020 during the COVID-19 pandemic to the traffic levels that existed pre-COVID-19 is presented in Final EIS Appendix Q Section 3.3, Transportation, Page 3.3-4 and summarized in Key Issue Response #2. This methodology is an industry-standard approach taken during the COVID-19 pandemic and was coordinated with the City of Vernon to obtain feedback on the approach before using the adjusted volumes in the traffic analysis. The traffic volumes presented in Draft EIS/SEIR Appendix Q represent the baseline condition at the time the environmental evaluation commenced and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes.
- Purpose of Malabar Yard Railroad Improvements - The purpose for implementing Malabar Yard railroad improvements is to comply with NEPA

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| | and CEQA's requirement to mitigate the Project's adverse effects resulting from permanent loss of approximately 5,500 feet of freight storage track capacity (40 CFR 1502.14(f), 40 CFR 1502.16(h); CEQA Guidelines §15126.4(a)). A project's impact on freight is an environmental topic required for consideration in an EIS using FRAs Environmental Procedures.<br><br>The Draft EIS/SEIR includes a comprehensive evaluation of potential environmental effects that may result upon implementation of the Malabar Yard railroad improvements and includes mitigation measures to reduce identified adverse effects. Metro is making all attempts to balance operational needs and minimize community impacts.<br><br>**IND 28-2** Metro recognizes the unique economic and industrial importance of Vernon, with its 40,000 employees, 1,500 businesses, and interconnected network of operations.<br><br>The responses below address the comments related to stakeholder engagement and outreach activities conducted in Vernon, community connectivity, total number of rail cars, and the economic and fiscal impact assessment prepared as part of the Draft EIS/SEIR.<br><br>• Stakeholder Engagement and Outreach in Vernon - Please refer to Key Issue Response #1 for a discussion of stakeholder engagement activities conducted in the City of Vernon to support the environmental review |

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| | process for the Malabar Yard railroad improvements. As summarized in Key Issue Response #1, Metro implemented a wide range of formal and informal outreach methods such as in-person and virtual public meetings, business and property owner briefings, coordination meetings with Vernon City staff, public presentations to the Vernon City Council, Vernon Business and Industry Commission, and Vernon Chamber of Commerce, distribution of legal advertisements, email blasts, door to door visits to potentially affected properties, phone calls to the businesses using publicly available information, Link US Project pamphlet distribution, and social media engagement. These outreach activities demonstrate that Metro and CHSRA met and exceeded legal requirements regarding responsibilities to engage and meaningfully involve all affected communities in the public decision-making process.<br><br>In 2020 and again in 2024 and 2025, Metro made physical visits to all potentially affected parcels and properties adjacent to the proposed Malabar Yard railroad improvements to engage with property owners and tenants and obtain contact information to share project details.<br><br>A summary of the notices, announcements, and mailings that were distributed to properties in Vernon is below: |

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| | ○ On September 22, 2020, Metro hand-delivered to owners of potentially affected properties notifications of the October 8, 2020 Virtual Public Scoping Meeting.<br>○ On September 22, October 6, and October 8, 2020, Metro distributed flyers and e-blasts to notify individuals, organizations, and agencies on the stakeholder distribution list including property owners and tenants of potentially affected parcels, the Vernon Chamber of Commerce, the Vernon Business and Industry Commission, and City representatives of the Revised NOI and October 8, 2020 Virtual Public Scoping Meeting.<br>○ On September 29, 2020, Metro used the County of Los Angeles assessor parcel information to notify all owners of properties traversed by the Project footprint that Metro had released a Revised NOI and that Metro was holding a Virtual Public Scoping Meeting on October 8, 2020.<br>○ Legal advertisements for the Revised NOI and Virtual Public Scoping Meeting were issued in five newspapers in 2020<br>○ On October 25, 2020, Metro distributed a tri-fold pamphlet to all property owners in the jurisdictional limits of Vernon and in the far northern portion of Huntington Park<br>○ On June 26, 2024, hand-delivered notifications were distributed to owners of all potentially affected properties to |

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| | notify them of the Draft EIS/SEIR public comment period and Open House/Public Hearing.<br>○ Link US Project tri-fold mailers (approximately 5,000) were distributed to owners of properties within 1-mile radius of the Malabar Yard railroad improvements prior to the Draft EIS/SEIR public review period and Open House/Public Hearing.<br>○ Legal advertisements for the release of the Draft EIS/SEIR and Open House/Public Hearing were issued in four newspapers in 2024.<br><br>As discussed in key Issue Response #1, between December 2024 and February 2025, Metro also met with 10 of 11 property owners/tenants that would be directly impacted by the Malabar Yard railroad improvements and 3 additional property owners/tenants and/or representatives that are not directly impacted, but that provided comments on the Draft EIS/SEIR during the Draft EIS/SEIR public comment period. The commentor was present during one of these meetings to gather feedback on the draft responses to comments that would be presented in the Final EIS, updates on the progress of ongoing meetings being held with all affected property owners and the City, alternatives considered based on direction from Los Angeles County Board of Supervisor Hahn's office, benefits of reduced railroad operations throughout the City, and the methods to |

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| | minimize property impacts resulting from the 49th Street Closure.<br><br>The potential impacts of the Malabar Yard railroad improvements, and related changes, including effects on traffic patterns and connectivity were considered in the Draft EIS/SEIR and presented to property owners and tenants of potentially affected properties in 2020, 2021, 2024, and 2025.<br><br>• Community Connectivity - The BNSF Harbor Subdivision has provided service to local customers since it was constructed in the 1880s, even earlier than the incorporation of the City of Vernon. Prior to the opening on the Alameda Corridor in 2002 the Subdivision also provided connectivity between the local ports and national railroad networks. See Draft EIS/SEIR Appendix Q Section 1, Figure 1-2 for the location of the Harbor Subdivision. The Harbor Subdivision is also shown in Volume III, Introduction on Figure 7 and 8. In the 1920s the Los Angeles Junction Railway was constructed increasing connectivity and service to local customers. Through the present day numerous local commercial and industrial businesses in the City of Vernon utilize freight rail services to ship goods in and out of their businesses.<br><br>The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from Los Angeles Junction. Daily |

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| | train movements on the Harbor Subdivision would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Key Issue Response #2, Table 2 and Figures 7 and 8). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent fewer train movements on the Harbor Subdivision. In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day).<br><br>As discussed above, in response to inquiries related to queuing and traffic congestion at the railroad crossings from Soto Street to Los Angeles Junction, a calculation was performed that demonstrates trains would block a driveway (or an intersection) approximately 2 percent of the day, and half of all trains would operate during the night (7:30pm to 2:00am). Considering the heavy presence of existing freight trains operating in the City already, reduced train frequencies that would be facilitated by the Malabar Yard railroad improvements, and the duration of the day trains would operate between Malabar Yard and Los Angeles Junction, no adverse effect related to division of communities or reduced community connectivity would occur. |

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| | • Total Number of Rail Cars on 46th Street Connector - Trains operating on the 46th Street Connector would be up to 3,000 feet long (similar to the existing condition) and not expected to result in 400 new rail cars out of the east entrance of Malabar Yard. Using the typical number of rail cars travelling on the 46th Street Connector (Draft EIS/SEIR Appendix Q, Section 2.3.3) and the length of each train anticipated to operate on the 46th Street Connector (up to 3,000 feet as clarified in Key Issue Response #2), each train is expected to carry up to 45 cars. Based on the future Project-related train movements that would operate on the 46th Street Connector (4 daily train movements), up to 180 rail cars would move along the 46th Street Connector per day as a result of the Malabar Yard railroad improvements. As disclosed in Key Issue Response #2, half of the trains operating on the 46th Street Connector (with 90 of the total 180 rail cars) would operate during the night (7:30pm to 2:00am).<br>• Economic and fiscal Impact Assessment - Metro recognizes the unique economic and industrial importance of Vernon, with its 40,000 employees, 1,500 businesses, and interconnected network of operations. Whie it is recognized the City of Vernon does contribute substantially to the region's economy, an in-depth analysis of economic and fiscal effects of the Malabar Yard railroad improvements is disclosed in Draft EIS/SEIR Appendix Q, |

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| | | Section 3.13. A balanced analysis was performed to determine the conclusions presented in the Draft EIS/SEIR based on the local and regional impacts from short-term construction spending, as well as long-term impacts related to potential job displacement and lost property tax revenues due to the required ROW acquisitions.<br><br>Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements during construction and operation and develop solutions that preserve the city's economic vitality and connectivity to the extent feasible. |
| | **IND 28-3** | The 46th Street Connector includes new railroad signals, flashers, gates, medians, curb line expansions, sidewalk/ramps, and driveway improvements at existing at-grade crossings on Pacific Boulevard, 46th Street, and Seville Avenue, as well as at the new at-grade crossing at Seville Avenue and 46th Street. Potential safety hazards associated with the new at-grade crossing at Seville Avenue and 46th Street are addressed in the Draft EIS/SEIR. Potential roadway safety devices that may be considered for future implementation (Malabar Yard Mitigation Measure TR-6) include queue cutter traffic signals or pre-signals for the new railroad crossing on Seville Avenue. These types of railroad safety improvements would enhance safety for commuters, pedestrians, and school children that utilize these |

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| | intersections and at-grade railroad crossings.<br><br>As discussed in Appendix Q Section 3.14, Page 3.14-24, all Malabar Yard railroad improvements would be designed and constructed to comply with FRA and CPUC standards and specifications to maximize safety for both motorized and non-motorized forms of transportation.<br><br>The Draft EIS/SEIR Section 3.5 and Draft EIS/SEIR Appendix G both discuss the potential impacts related to pollution (air quality, climate change, and health risk) associated with the Project (Build Alternative and Malabar Yard railroad improvements combined). As discussed in Key Issue Response #3, based on South Coast Air Quality Management's (SCAQMD) definition, sensitive receptors are identified as locations where an individual could remain for 24 hours and includes land uses such as residences, schools, playgrounds and athletic facilities on school property, childcare centers, long term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes.<br><br>Based on the type of infrastructure improvements proposed, a buffer of one-quarter mile is used to identify sensitive receptors for further consideration of potential impacts. The nearest sensitive receptors identified and considered in the air quality analysis for the Malabar Yard railroad improvements were:<br><br>• Residences at 2415 2427 E 53rd St. (located approximately 1,325 feet [0.25 |

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| | mile] south of the Malabar Yard railroad improvements),<br>• Vernon City School at 2360 East Vernon Avenue (located approximately 1,350 feet [0.25 mile] northwest of the Malabar Yard railroad improvements), and<br>• Residences on Furlong Place (located approximately 1,650 feet [0.31 mile] northwest of the Malabar Yard railroad improvements).<br>Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling (which includes truck idling) associated with the Malabar Yard railroad improvements. The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from the Los Angeles Junction. The consolidated train movements would result in 78 percent less train movements on the Harbor Subdivision coming from/to the San Bernardino Subdivision. Thus, fewer train movements on the Harbor Subdivision equates to less vehicle idling (including truck idling) at each of the at-grade crossings where sensitive receptors are located, such as the Vernon City School. Because the implementation of the 46th Street Connector would shift freight rail activity away from sensitive receptors, vehicle idling (including truck idling) at Malabar Yard would be so minimal it would not cause a violation of any air quality standard. |

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| | General Conformity is the pollution prevention and control program that requires a federal agency to assure any proposed activity the agency proposes will conform to the purpose of applicable implementation plans and will not interfere with a State or Tribe's ability to attain and maintain the National Ambient Air Quality Standards (NAAQS) for air quality, as required under Clean Air Act (CAA) section 176(c).<br><br>The purpose of the General Conformity rule is to ensure that:<br><br>• federal activities do not cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS);<br><br>• actions do not worsen existing violations of the NAAQS; and<br><br>• attainment of the NAAQS is not delayed.<br><br>As demonstrated in the Final EIS pages 3.5-26 to 3.5-34, RONA, and Appendix G of the Final EIS, the annual construction emissions and annual net change in operational emissions for all analysis years generated by the Build Alternative and Malabar Yard railroad improvements, as compared to the No Action Alternative, are below the general conformity *de minimis* levels for all years of analysis with implementation of mitigation. As such a formal general conformity determination with additional localized analyses are not required. The Build Alternative and Malabar Yard railroad improvements would not interfere with the state's plans to attain and maintain the NAAQS. A detailed $PM_{10}$ and $PM_{2.5}$ hot-spot analysis was not completed because FCAA |

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| | and 40 CFR 93.116 requirements would be met without an explicit hot-spot analysis.<br><br>As detailed in the Key Issue Response #3, localized air quality impacts, under CEQA, were evaluated using the localized significance threshold methodology from SCAQMD. This methodology sets a screening level threshold based on the pollutant ($NO_x$, CO, $PM_{10}$, $PM_{2.5}$) and the distance to the nearest air quality sensitive receptor in that source receptor area (location). On-site emissions are calculated and then compared to these thresholds. SCAQMD uses the localized significance threshold (LSTs) to evaluate if projects qualify to be screened out from the requirement to conduct project-specific dispersion modeling. If required, the purpose of dispersion modeling is to demonstrate that a project would not delay attainment of ambient air standards. If a project's on-site emissions are below the LSTs, then no further analysis with dispersion modeling is required. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of an ambient air standard.<br><br>As indicated in Draft EIS/SEIR Chapter 7, Table 7-31 criteria pollutants would not exceed SCAQMD thresholds during construction or operations and air quality impacts associated with the Malabar Yard railroad improvements would be less than significant. Regarding localized emissions, the Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. |

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| | On-site construction emissions at Malabar Yard were compared to SCAQMD localized significance threshold (LST) and were found to be below the thresholds for all criteria air pollutants (NOx, CO, $PM_{10}$, $PM_{2.5}$) (see Appendix F of the Final EIS Appendix Q). Air quality impacts to sensitive receptors further away from the emission source would be less likely to be impacted than those identified through the localized analysis. Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.<br><br>Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4. In addition to the regional air quality benefits, from a localized perspective, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard.<br><br>The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS |

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| | Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*. |

but we're spending lots of money to fix LA, while at the same time we are sandbagging Vernon with all of the mitigation that's required without any kind of mitigation for the benefit of the property-owners, the employees, and the businesses in the City of Vernon. IND 28-4

**IND 28-4** The Project is a regional rail project that provides multiple benefits across the entire rail and transit system throughout southern California, not just the area surrounding LAUS. Malabar Yard railroad improvements are proposed in the City of Vernon to offset the loss of storage track capacity at the BNSF West Bank Yard. The freight rail impacts of the Build Alternative or Build Alternative Design Option are being mitigated at Malabar Yard because Malabar Yard is the closest BNSF facility that is located in proximity to, and west of, BNSF Hobart/Commerce Intermodal Yards and it includes enough space to replace some of the lost storage capacity and preserve the current levels of freight rail operations in accordance with the provisions of the Purpose and Need for the Project.

Multiple mitigation measures are required to be implemented by Metro and/or BNSF in the City of Vernon. The mitigation measures outlined in Draft EIS/SEIR Appendix Q and summarized in Executive Summary Table ES-1 and ES-2 would avoid, minimize, and mitigate the identified impacts in the City of Vernon. Based on the timing of when impacts are anticipated, these mitigation measures in the City of Vernon would be implemented prior to construction, during construction, or throughout operation.

The reduced train movements in Vernon that would occur due to the consolidation of freight service are discussed in Comment IND 28-2 response. Beneficial effects related to traffic, noise, air quality, and community

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| | connectivity would contribute to enhanced quality of life for all residents and workers in Vernon. Fewer train movements on the Harbor Subdivision would improve citywide circulation and increase opportunities for enhanced community connectivity. |

**Comment Number:** IND 29

**Name:** Patricia Roach Finkel

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

Patricia Roach Finkel. · Property owner at [redacted]. · That's on the corner of 49th Street and Hampton. Dollar King is our tenant since 2018. · First of all, we are ·requesting a restart of your study, of your entire study from the ·very beginning. · But what I wanted to do, I will tell you a couple of reasons why. · But what I would like to talk about, ·first of all, we were never informed. · We only found out about this in May from our tenant, Dollar King. · We as property owners were never informed. · So even if you started this study in 2016, ·we did not hear about it until a month and a half ago. · So that's ·number one. · That's one of the reasons. · Also, we rely on our rents in our family to pay our property taxes, to pay our mortgages. · You're impacting what my financial, you know, status will be full-time. · And it would take ·away from my livelihood and my income, plus all the other ·property owners there in the same city neighborhood, you know. ·That would be a considerable burden for all of us. · There's a couple of things I'd like to talk about. IND 29-1

Number one, the economic oversight. · The failure to ·thoroughly review the regional economic impact neglects the substantial contribution of this area to the broader economy ·Ignoring the potential disruption to over 40,000 employees in a billion dollar economic zone, though, could lead to significant ·underestimate -- underestimation of negative financial consequences affecting, not only just the local businesses, but also regional economic stability and growth. IND 29-2

Number two, employment risk, by not clearly assessing how the project will interfere with such a large workforce, the EIR overlooks the potential job losses, reduced productivity, and ·economic hardships for tens of thousands of employees. · This lack of clarity can result in inadequate mitigation strategies, ·exacerbating the socioeconomics impacts on the community and the ·regional economy. IND 29-3

## IND 29 Patricia Roach Finkel

**IND 29-1** Metro appreciates the comments provided regarding the technical analysis presented in the Draft EIS/SEIR and stakeholder engagement activities conducted in the City of Vernon to support the environmental review process for the Malabar Yard railroad improvements.

The commenter provides no basis for why studies need to be redone, as current information with an appropriate level of detail was used in the Draft EIS/SEIR environmental evaluation.

In September 2020, Metro met with the property owner that the commentor represents to discuss the Link US Project, Malabar Yard railroad improvements, and potential effects to gather feedback for consideration in the environmental evaluation. Between December 2024 and February 2025, multiple attempts were made by Metro to meet with the commentor to discuss the Malabar Yard railroad improvements and comments raised during the 45-day public comment period. In February 2025, Metro did meet with the property owner's representative during a meeting with a nearby property owner.

Please refer to Key Issue Response #1 for a discussion of stakeholder engagement activities conducted in the City of Vernon to support the environmental review process for the Malabar Yard railroad improvements. As summarized in Key Issue Response #1,

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| | Metro implemented a wide range of formal and informal outreach methods such as in-person and virtual public meetings, business and property owner briefings, coordination meetings with Vernon City staff, public presentations to the Vernon City Council, Vernon Business and Industry Commission, and Vernon Chamber of Commerce, distribution of legal advertisements, email blasts, door to door visits to potentially affected properties, phone calls to the businesses using publicly available information, Link US Project pamphlet distribution, and social media engagement. These outreach activities demonstrate that Metro and CHSRA met and exceeded legal requirements regarding responsibilities to engage and meaningfully involve all affected communities in the public decision-making process.<br><br>In 2020 and again in 2024, Metro made physical visits to all potentially affected parcels and properties adjacent to the proposed Malabar Yard railroad improvements to engage with property owners and tenants and obtain contact information to share project details.<br><br>A summary of the notices, announcements, and mailings that were distributed to properties in Vernon is below:<br><br>• On September 22, 2020, Metro hand-delivered to owners of potentially affected properties notifications of the October 8, 2020, Virtual Public Scoping Meeting. |

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| | • On September 22, October 6, and October 8, 2020, Metro distributed flyers and e-blasts to notify individuals, organizations, and agencies on the stakeholder distribution list including property owners and tenants of potentially affected parcels, the Vernon Chamber of Commerce, the Vernon Business and Industry Commission, and City representatives of the Revised NOI and October 8, 2020 Virtual Public Scoping Meeting.<br>• On September 29, 2020, Metro used the County of Los Angeles assessor parcel information to notify all owners of properties traversed by the Project footprint that Metro had released a Revised NOI and that Metro was holding a Virtual Public Scoping Meeting on October 8, 2020.<br>• Legal advertisements for the Revised NOI and Virtual Public Scoping Meeting were issued in five newspapers in 2020<br>• On October 25, 2020, Metro distributed a tri-fold pamphlet to all property owners in the jurisdictional limits of Vernon and in the far northern portion of Huntington Park<br>• On June 26, 2024, hand-delivered notifications were distributed to owners of all potentially affected properties to notify them of the Draft EIS/SEIR public comment period and Open House/Public Hearing.<br>• Link US Project tri-fold mailers (approximately 5,000) were distributed to |

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| | | owners of properties within 1-mile radius of the Malabar Yard railroad improvements prior to the Draft EIS/SEIR public review period and Open House/Public Hearing<br>• Legal advertisements for the release of the Draft EIS/SEIR and Open House/Public Hearing were issued in four newspapers in 2024<br><br>No physical impacts are proposed to the properties east of Malabar Yard, including the property the commentor represents. Economic and fiscal impacts were determined by considering where potential property acquisitions and building demolition may occur that would cause potential for business displacement (see Draft EIS/SEIR Appendix Q, Section 3.13, Page 3.13-3); neither of which are proposed on the subject property. For these reasons, the Malabar Yard railroad improvements are not anticipated to adversely affect the livelihood or income from this property. Other properties where physical impacts may occur are considered and those impacts have been disclosed in the Draft EIS/SEIR. As discussed above, Metro has also met with individual property owners where impacts may occur to discuss the Malabar Yard railroad improvements and potential effects on those properties. |
| | **IND 29-2** | The analysis does not disregard the 40,000 people working within the City of Vernon, as the analyses includes existing businesses in the area including warehouses, wholesale and distribution services, and other commercial enterprises within the study |

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| | | area. Metro recognizes the unique economic and industrial importance of Vernon, with its 40,000 employees, 1,500 businesses, and interconnected network of operations.<br><br>While it is recognized the City of Vernon does contribute substantially to the region's economy, an in-depth analysis of economic and fiscal effects of the Malabar Yard railroad improvements is disclosed in Draft EIS/SEIR Appendix Q, Section 3.13. A balanced analysis was performed to determine the conclusions presented in the Draft EIS/SEIR based on the local and regional impacts from short-term construction spending, as well as long-term impacts related to potential job displacement and lost property tax revenues due to the required ROW acquisitions. |
| | **IND 29-3** | Please refer to the Comment IND 29-2 response above for a discussion on economic and fiscal impacts. The socioeconomic impact analysis of the Malabar Yard railroad improvements, including an analysis of business displacements and the economy were also disclosed in Draft EIS/SEIR Appendix Q, Section 3.13 and Section 3.15. |

And number three is a comprehensive planning deficiency, an EIR that does not fully consider the regional economic impact which fails to provide a comprehensive evaluation necessary for informed decision-making. This omission can lead to approval of projects that might cause significant or long-term harm to the economic vitality of the region undermining strategic planning and substantial -- sustainable development goals. Thank you.

IND 29-4

**IND 29-4** Please refer to the Comment IND 29-2 response for a discussion on economic and fiscal impacts. As discussed in this response, a balanced analysis was performed to determine the conclusions presented in the Draft EIS/SEIR based on the local and regional impacts from short term construction spending, as well as long term impacts related to potential job displacement and lost property tax revenues due to the required ROW acquisitions.

**Comment Number:** IND 30

**Name:** Melissa Ybarra

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

My name is Melissa Ybarra.· I am the mayor pro tem for the City of Vernon.· I am here to convey my concerns with several elements of Malabar project.· The proposed additional thousand feet of rail connection as well as the roads closure and modification of two streets with within the city.· The proposed ·modifications will increase freight train traffic and provide for longer trains for almost a mile in length, as it is the incoming train coming into Malabar station, backs up traffic in front of my house, which is a block away from Pacific Boulevard, which I have to see trucks idling in front of my house every day. This is an everyday thing. IND 30-1

Also, this will significantly impact emergency response times for Vernon Police Department, LA County Fire, and ambulance ·services coming from the City of LA.· Vernon Avenue into Pacific going into Community Hospital, I get LA City Fire ambulances ·coming in every day.· That's going to stop them from getting ·their emergency response into the City of Huntington Park where they're supposed to. IND 30-2

Longer trains will also increase vehicle idling times resulting in higher emission of pollutants, further exacerbating ·air quality issues.· We have a Vernon Elementary ·School that's 1,000 feet from it; and on top of that, we have a residential population around that school, including the ·additional residential population that we're growing within Santa Fe. IND 30-3

So your environmental impact report doesn't match or didn't match our environmental impact report when we added our housing along Santa Fe Avenue -- keep that into consideration because as we're adding population to Vernon, you're taking it away by building this Malabar Yard and expanding it. Let's see. The proximity of the proposed rail yard expansion is unacceptable close to the elementary school, as I said, as our healthy development and it will have a negative impact on the community and on the surrounding community, the ·city of Huntington Park, the incoming traffic. You have a delay with your Metro when your Metro breaks down on Long Beach, that backs up all the way half way down Vernon Avenue into Vernon, so you have to remember that.· The traffic coming in and out of Vernon isn't just within the one-mile radius of that 49th Street and 46th Street. It's an impact coming in from every -- north, east, IND 30-4

## IND 30 Melissa Ybarra

**IND 30-1** Metro appreciates the comments provided regarding the data and analysis in the Draft EIS/SEIR. The responses below address the comments related to consolidated freight railroad operations that would reduce train movements and contribute to enhanced quality of life in Vernon, traffic delay, and vehicle idling and local air pollution.

- Consolidated Freight Service and Reduced Train Frequencies - The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from Los Angeles Junction. Daily train movements on the Harbor Subdivision (parallel to Santa Fe Avenue) would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Key Issue Response #2, Table 2 and Figures 7 and 8). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent fewer train movements on the Harbor Subdivision (parallel to Santa Fe Avenue). In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day) and an overall

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| | improvement to citywide circulation would result.<br><br>As discussed in Key Issue Response #2, trains operating on the 46th Street Connector (and the affected routes considered) would be 3,000 feet (similar to the existing condition) and not expected to be 5,280 feet (1 mile) in length. Final EIS Volume III, Introduction (Key Issue Response #2) includes clarification to the information presented in the Draft EIS/SEIR related to the train movements and the length of trains in the existing and future conditions.<br><br>• Traffic Delay - In regard to traffic delays, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue – operations, and Fruitland Avenue – operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such traffic delays are not expected to back up traffic within the immediate vicinity of Pacific Boulevard.<br><br>• Vehicle Idling and Local Air Pollution - Please refer to Key Issue Response #3 for a discussion related to |

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| | | the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4.<br><br>Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements and develop solutions that preserve the city's economic vitality and connectivity to the extent feasible. |
| | **IND 30-2** | Metro appreciates the comments provided regarding the potential impact of freight rail operations on emergency response times. Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were |

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| | evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |

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| | | Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements during construction and operation and to develop solutions that reduce traffic delays and maintain public safety. |
| | **IND 30-3** | Please refer to Comment IND 30-1 response for information on the train lengths and details on the analysis performed related to vehicle idling and local air pollution. As discussed in that response, the length of freight trains operating on the affected routes would remain 3,000 feet long (similar to the existing condition) and the Malabar Yard railroad improvements are not expected to result in extended idling time for trucks or vehicles.<br><br>The Draft EIS/SEIR Section 3.5 and Draft EIS/SEIR Appendix G both discuss the potential impacts related to pollution (air quality, climate change, and health risk) associated with the Project (Build Alternative and Malabar Yard railroad improvements combined). As discussed in Key Issue Response #3, based on South Coast Air Quality Management's (SCAQMD) definition, sensitive receptors are identified as locations where an individual could remain for 24 hours and includes land uses such as residences, schools, playgrounds and athletic facilities on school property, childcare centers, long term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. |

Based on the type of infrastructure improvements proposed, a buffer of one-quarter mile is used to identify sensitive receptors for further consideration of potential impacts. The nearest sensitive receptors identified and considered in the air quality analysis for the Malabar Yard railroad improvements were:

- Residences at 2415 2427 E 53rd St. (located approximately 1,325 feet [0.25 mile] south of the Malabar Yard railroad improvements),
- Vernon City School at 2360 East Vernon Avenue (located approximately 1,350 feet [0.25 mile] northwest of the Malabar Yard railroad improvements), and
- Residences on Furlong Place (located approximately 1,650 feet [0.31 mile] northwest of the Malabar Yard railroad improvements).

Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling (which includes truck idling) associated with the Malabar Yard railroad improvements. The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from the Los Angeles Junction. The consolidated train movements would result in 78 percent less train movements on the Harbor Subdivision coming from/to the San Bernardino Subdivision. Thus, fewer train

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| | movements on the Harbor Subdivision equates to less vehicle idling (including truck idling) at each of the at-grade crossings where sensitive receptors are located, such as the Vernon City School. Because the implementation of the 46th Street Connector would shift freight rail activity away from sensitive receptors, vehicle idling (including truck idling) at Malabar Yard would be so minimal it would not cause a violation of any air quality standard.<br><br>General Conformity is the pollution prevention and control program that requires a federal agency to assure any proposed activity the agency proposes will conform to the purpose of applicable implementation plans and will not interfere with a State or Tribe's ability to attain and maintain the National Ambient Air Quality Standards (NAAQS) for air quality, as required under Clean Air Act (CAA) section 176(c).<br><br>The purpose of the General Conformity rule is to ensure that:<br>• federal activities do not cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS);<br>• actions do not worsen existing violations of the NAAQS; and<br>• attainment of the NAAQS is not delayed.<br><br>As demonstrated in the Final EIS pages 3.5-26 to 3.5-34, RONA, and Appendix G of the Final EIS, the annual construction emissions and annual net change in operational emissions for all analysis years generated by |

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| | the Build Alternative and Malabar Yard railroad improvements, as compared to the No Action Alternative, are below the general conformity *de minimis* levels for all years of analysis with implementation of mitigation. As such a formal general conformity determination with additional localized analyses are not required. The Build Alternative and Malabar Yard railroad improvements would not interfere with the state's plans to attain and maintain the NAAQS. A detailed $PM_{10}$ and $PM_{2.5}$ hot-spot analysis was not completed because FCAA and 40 CFR 93.116 requirements would be met without an explicit hot-spot analysis.<br><br>As detailed in the Key Issue Response #3, localized air quality impacts were evaluated using the localized significance threshold methodology from SCAQMD. This methodology sets a screening level threshold based on the pollutant ($NO_x$, CO, $PM_{10}$, $PM_{2.5}$) and the distance to the nearest air quality sensitive receptor in that source receptor area (location). On-site emissions are calculated and then compared to these thresholds. SCAQMD uses the localized significance threshold (LSTs) to evaluate if projects qualify to be screened out from the requirement to conduct project-specific dispersion modeling. If required, the purpose of dispersion modeling is to demonstrate that a project would not delay attainment of ambient air standards. If a project's on-site emissions are below the LSTs, then no further analysis with dispersion modeling is required. LSTs represent the maximum emissions from a project that are not |

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| | expected to cause or contribute to an exceedance of an ambient air standard.<br><br>As indicated in Draft EIS/SEIR Chapter 7, Table 7-31 criteria pollutants would not exceed SCAQMD thresholds during construction or operations and air quality impacts associated with the Malabar Yard railroad improvements would be less than significant. Regarding localized emissions, the Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. On-site construction emissions at Malabar Yard were compared to SCAQMD localized significance threshold (LST) and were found to be below the thresholds for all criteria air pollutants (NOx, CO, $PM_{10}$, $PM_{2.5}$) (see Appendix F of the Final EIS Appendix Q). Air quality impacts to sensitive receptors further away from the emission source would be less likely to be impacted than those identified through the localized analysis. Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.<br><br>Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4. In addition to the regional air quality benefits, from a localized perspective, |

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| | implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard.<br><br>The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*. |

south, and west. I urge Metro to consider the post-modification of the ·Malabar Yard and seek alternative solutions that do not inappropriately impact the City of Vernon and our neighboring communities.· Thank you.

IND 30-4 Contd.

**IND 30-4** While agencies typically do prepare environmental documents in tandem with projects from other agencies, the *2023 Vernon Westside Zone Change and General Plan Amendment* (adopted July 2023) was not considered in the Draft EIS/SEIR environmental evaluation because the zone change and amendment was not formally adopted at the time the Revised NOI was issued in September 2020. As required by 40 C.F.R. 1502.16(c), Metro performed a consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023) for inclusion in the Final EIS. Based on the analysis performed in the Final EIS Volume III Introduction Table 5, the Malabar Yard railroad improvements were determined to be consistent with the goals and policies within the *2023 Vernon Westside Zone Change and General Plan Amendment*. Therefore, no conflict would occur with implementation of the Malabar Yard railroad improvements.

The Malabar Yard railroad improvements would facilitate consolidation of freight service in the city from Los Angeles Junction; thereby reducing the total daily train movements on the Harbor Subdivision parallel to Santa Fe Avenue where future mixed-use development is planned. This reduction of train movements would result in a benefit of localized air emissions and noise and vibration reductions to nearby sensitive receptors that are currently present, in addition to future sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside*

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| | *Zone Change and General Plan Amendment*.<br><br>In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Draft EIS/SEIR. These measures are incorporated in the Final EIS as Offsetting Mitigation Measures (OMMs). The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis.<br><br>The Malabar Yard railroad improvements would not preclude future developer's ability to add residential units in the City of Vernon. No expansion of BNSF's Malabar Yard is proposed as part of the Project. to the Malabar Yard railroad improvements would result in fewer trains operating where current and future sensitive receptors are located.<br><br>Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of |

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| | Malabar Yard railroad improvements. The Malabar Yard railroad improvements would not generate new traffic but would redistribute existing traffic on local roadways. In regard to traffic delays, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue – operations, and Fruitland Avenue – operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, traffic delays would not result in adverse traffic impacts in Vernon or surrounding neighborhoods. |

**Comment Number:** IND 31

**Name:** Peter Miladeo

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

I'm Peter Miladeo with Consolidated Fabricators as well.· I've been working there for 31 years.· I've been running a·crew of guys who've worked there, lived there for years and years.· One of my guys who have been with me have been working there for 20-plus years and the majority of them. I think the newest guy I have working for us has been here four years already.· The tenure of the people there and their commitment to the community in general by working there, being there, and being a part of that community in general, most of them live within the vicinity.· This would dislocate them completely.· And our building starts at Santa Fe and it actually ends at the railyard.· It spans the whole width of the 49th Street.· We've been running trucks in and out of there for 31 years.· There's several trucks, as my brother mentioned earlier, and those trucks have already congested us with what we have.· This would completely clog us ·and negate our ability to do business in general. IND 31-1

## IND 31 Peter Miladeo

**IND 31-1** Metro appreciates the input received and the detailed background provided regarding Consolidated Fabricators' longstanding operations at the corner of 49th Street and Santa Fe Avenue in the City of Vernon. Metro recognizes this facility's valuable contributions to the community over the past 45 years. Metro has carefully considered the comments provided regarding the business operations that involve specialized equipment at this facility.

Closure and relocation of the Consolidated Fabricators business is not proposed, nor deemed required, as part of the Malabar Yard railroad improvements because the 49th Street Closure would be designed in a manner to allow business access to be maintained. In 2020 and 2021, Metro staff collaborated with the property owner to develop the hammerhead configuration (49th Street Closure Design Option 2) as a means to maintain ingress/egress to the Consolidated Fabricators business. The 49th Street Closure Design Option 2 is the preferred design option for the 49th Street Closure.

The 49th Street Closure Design Option 2 would allow for safe and legal access into and out of the Consolidated Fabricators business and adequate ingress/egress for large semi-trucks would be maintained. In February 2025, Metro met with the property owner and requested to be present during heavy delivery days when trucks are staged

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| | along Santa Fe Street to assess the potential for worsening these types of backups. Metro has committed to coordinate further with the property owner to maintain safe, legal, and adequate access for vehicles and large-semi-trucks during construction and throughout operation.<br><br>No new truck trips would be generated throughout operations. Traffic redistribution on Santa Fe Avenue would occur and was considered as part of the traffic impact analysis. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, the Malabar Yard railroad improvements would not contribute to traffic congestion or result in impacts that would negate business operations.<br><br>Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. |

**Comment Number:** IND 32

**Name:** Frank Zells

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

My name is Frank Zells. I am a Downtown LA resident.· LA City Council well imposed their agenda, whatever. We have to vote for the appropriate·pro-business people and tell your friends.· This is a climate agenda project. Since they started recording the temperature in·1880, the temperature has gone up one degree Celsius and in another·144 years, it is going to go up one degree Celsius more. I think it's a panic -- the sea level has gone up, like, eight or -- ·about eight feet since then also, like, the width of a hair every year. IND 32-1

Last year was the coldest recorded temperature in LA history.· In Spain and the Philippines also last year, it was ·record heat wave of three to five degrees hotter.· They're going to continue.· It's a trend.· And it's going to be, like, an ice age where it's the opposite.· It's going to be hot on the top and cold in the middle in, like, 10,000 years.· The news reporters are the ones that's causing the panic, and they put scientists on the spot in interviews.· Le Nina rain season last year cold waterfront is causing all the strong winds and they're blaming it on hot weather this year, whatever. IND 32-2

Also this project is one billion dollars.· The homeless crisis in Los Angeles is worth one billion dollars also.· They can't fix it.· It's the most expensive ever.· Uhm, okay.· I -- I would suggest to reduce the scope of the work, like the LA City building.· They wanted to retrofit it for earthquake-proof, and they want to put all these hydraulics. I suggest just breaking it into three parts and put strong walls and hydraulics in three areas instead of ten and you can reduce millions of dollars. So climate agenda is destroying Los Angeles and United States industries like tourism, airlines, representative Barragan from the Los Angeles democrat for the U.S. House. IND 32-3

## IND 32 Frank Zells

**IND 32-1** Metro appreciates the comments regarding the climate implications of the project. While it is true that global temperatures have increased by approximately 1°C since 1880, climate change is a complex issue influenced by a variety of factors, including greenhouse gas emissions, land use changes, and energy consumption.

As discussed in Draft EIS/SEIR Chapter 1, the purpose of the Project is to increase the regional and intercity rail service capacity of LAUS and to improve schedule reliability at LAUS through the implementation of a run through tracks configuration and elimination of the current stub end tracks configuration while preserving current levels of freight rail operations, accommodating the planned HSR system in Southern California, increasing the passenger/pedestrian capacity and enhancing the safety of LAUS through the implementation of a new passenger concourse meeting the multi modal transportation demands at LAUS.

The Draft EIS/SEIR addresses potential impacts related to climate change and its long-term effects on global temperatures (see Draft EIS/SEIR Section 3.5.4 and Appendix G for the Build Alternative and Final EIS Section 9.13.2 and Table 9-12 for the Build Alternative Design Option) and includes mitigation measures to reduce potential adverse effects related to climate change. The Project would support sustainable transportation solutions, reduced

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| | | congestion, and improved air quality in the long term, which are all components of broader efforts to address climate change. The same mitigation applies for the Build Alternative and Build Alternative Design Option.<br><br>Metro remains committed to environmental stewardship and strives to balance development with the goal of reducing carbon emissions and promoting sustainability. |
| | **IND 32-2** | The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIS/SEIR. |
| | **IND 32-3** | As disclosed in Draft EIS/SEIR Chapter 2, the Build Alternative evaluated in the Draft EIS/SEIR is based on a screening process consisting of 14 track alignment alternatives and 6 concourse concepts described in detail in Draft EIS/SEIR Appendix B, *NEPA Alternatives Evaluation Memorandum and Engineering Plans*. The screening process included design considerations for engineering feasibility, safety, community preferences, and optimization of LAUS spaces. All potential effects that relate to seismic events was considered in the Draft EIS/SEIR Section 3.9. As discussed in Draft EIS/SEIR Appendix K, Section 6.2, no known or potentially active faults were mapped within the Project study area, and the Project is not within an Alquist-Priolo Earthquake Fault Zone. The Project study area is the same as for the Build Alternative and Build Alternative Design Option. The comment does not raise an issue related to the |

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| | adequacy of any specific section or analysis of the Draft EIS/SEIR. |

**Comment Number:** IND 33

**Name:** Steve Florman

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

Hi, my name is Steve Florman.· I am the owner of the building that houses Wells Fargo Bank and Stacy Medical Center. And, basically, Vernon has been currently an economic engine for us residents in the surrounding community. Tens of thousands of people travel to and from Vernon, daily, for work. The proposed project of Malabar Yard will divide Vernon, making it difficult to get to and from the workplace without major delays, creating a severe impact on the quality of life for any individual that travels through our city.· The project will divide Vernon, making it difficult, if not impossible for emergency response services to access areas where immediate assisted in dire need.· The project will create barriers to the businesses that have multiple locations throughout our city and in surrounding communities. IND 33-1

The -- in particular we operate 24/7 Urgent Care located on Pacific and 46th Street.· We have been in Vernon since 1989.· The proposed project will make it difficult, at times impossible for patients to get to our facility in a timely manner after suffering a potential life-threatening injury.· As well, the proposed project will make it difficult, at times impossible for paramedics and police to get to our facility in a timely manner should have -- should they be summoned. IND 33-2

Prior to the completion of the Alameda Corridor in 2002, it was not uncommon for motorists and pedestrians to wait up to one hour at the railroad crossings.· The traffic was horrendous.· And the residents and the workers in our community lost countless hours from their day, waiting needlessly, at railroad crossing while idling vehicles created more pollution for the local residents, greatly affecting their health.· The folks that patiently waited at the crossings would never be able to recover their precious time they spent waiting for railroad cars to clear intersections. Following the completion of Alameda Corridor for 20 years, the quality of life in the community has -- drastically improve and pedestrians and motorists can enjoy pleasure moving in and out freely with minimal barriers. Now, with the proposed Link US Project, our community will be back where it started. IND 33-3

## IND 33 Steve Florman

**IND 33-1** Metro appreciates the comments provided regarding the Malabar Yard railroad improvements. Metro recognizes the unique economic and industrial importance of Vernon, with its 40,000 employees, 1,500 businesses, and interconnected network of operations. The potential impacts of the Malabar Yard railroad improvements, and related changes, including effects on traffic patterns and connectivity were considered in the Draft EIS/SEIR and presented to property owners and tenants of potentially affected properties in 2020, 2021, 2024, and 2025. The Draft EIS/SEIR includes an analysis of potential traffic, connectivity, and economic impacts, including mitigation measures to avoid and/or minimize disruptions to businesses and jobs in Vernon.

The responses below address the comments related to community connectivity, consolidated freight railroad operations that would reduce train movements and contribute to enhanced quality of life in Vernon, traffic delay and job accessibility, and life safety and emergency response.

- Community Connectivity and Consolidated Freight Operations - The BNSF Harbor Subdivision has provided service to local customers since it was constructed in the 1880s, even earlier than the incorporation of the City of Vernon. Prior to the opening on the Alameda Corridor in 2002 the Subdivision also provided connectivity

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| | between the local ports and national railroad networks. See Draft EIS/SEIR Appendix Q Section 1, Figure 1-2 for the location of the Harbor Subdivision. The Harbor Subdivision is also shown in Volume III, Introduction on Figure 7 and 8. In the 1920s the Los Angeles Junction Railway was constructed increasing connectivity and service to local customers. Through the present day numerous local commercial and industrial businesses in the City of Vernon utilize freight rail services to ship goods in and out of their businesses.<br><br>The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from Los Angeles Junction. Daily train movements on the Harbor Subdivision would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Key Issue Response #2, Table 2 and Figures 7 and 8). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent fewer train movements on the Harbor Subdivision. In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day). Fewer train movements on the Harbor Subdivision |

would increase opportunities for enhanced community connectivity.

In response to inquiries related to queuing and traffic congestion at the railroad crossings from Soto Street to Los Angeles Junction, a calculation was performed that demonstrates trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Considering the heavy presence of existing freight trains operating in the City already, reduced train frequencies that would be facilitated by the Malabar Yard railroad improvements, and the duration of the day trains would operate between Malabar Yard and Los Angeles Junction, no adverse effect related to division of communities or reduced community connectivity would occur.

- Traffic Delay and Job Accessibility - In regard to traffic delays, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue – operations, and Fruitland Avenue – operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 (described below) would maintain or improve the v/c ratio during construction

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| | and operation to mitigate all LOS-related traffic impacts. As such the local community will not be severely impacted by traffic delays that would affect accessibility to mentioned destinations (jobs and childcare).<br><br>*Construction*<br>○ MY TR-1 requires a Traffic Management Plan (TMP) to be prepared, clearly marked detours to be implemented, and advanced notice be provided to the community. The TMP requires traffic flow to be maintained to the safest degree feasible and the City of Vernon along with other emergency service providers to be notified in advance of street closures, detours, or temporary lane reductions.<br>○ MY TR-2 requires temporarily restriping of the westbound shared through/right-turn lane to a westbound right-turn-only lane at Vernon Avenue and add a right-turn overlap phase in the same direction.<br><br>*Operations*<br>○ MY TR-3 and MY TR-4 are proposed to improve the v/c ratio at intersections near Stacy Medical Center.<br>○ MY TR-5 is proposed to maintain the LOS along Fruitland Avenue.<br>• Life Safety and Emergency Response - Please refer to Key Issue Response #4 for a discussion of public |

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| | safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – |

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| | | Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |
| | **IND 33-2** | During the January 14, 2025, meeting conducted onsite with the property owner, Metro provided exhibits to demonstrate no direct impacts on the commentor's property are proposed and to clarify the Project components in context with the existing property. Metro will continue to coordinate with the property owner to refine their parcel-specific conceptual design during the final design and right of way process.<br><br>No modifications to the ingress/egress of the commenter's property, including driveway modifications are proposed and access to property would be maintained 24/7. The existing roadways and intersections adjacent to and within the vicinity of the commentor's property may be subject to temporary detours and lane blockages during construction to implement the connector track, railroad safety/signal improvements and roadway restriping that may be required. Malabar Yard Mitigation Measure TR-1 (described in Draft EIS/SEIR Appendix Q, Section 3.3.5) requires the preparation and implementation of a Traffic Management Plan (TMP) to maintain vehicular traffic throughout construction zones while minimizing potential roadway hazards during |

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| | construction. The TMP requires traffic flow to be maintained to the safest degree feasible, notice signs to be posted prior to construction in areas where access to local businesses could be affected, and notification to be coordinated with the City of Vernon in advance of street closures, detours, or temporary lane reductions. With the implementation of Malabar Yard Mitigation Measure TR-1, no direct adverse effect would occur.<br><br>The information regarding train consists and movements along the existing spur line that traverses Pacific Boulevard (West Seville Connection) was provided by BNSF for use in the environmental evaluation. All of the information and analysis of typical freight railroad operational patterns, and the conclusions in the Draft and Final EIS are based on a combination of historical data, stakeholder input, and expert analysis. Reliance on information provided by BNSF is imperative because Metro does not operate freight service and BNSF is the responsible entity for managing freight operations in southern California, including the train movements at Malabar Yard and Los Angeles Junction.<br><br>In the existing condition, vehicle travel already occurs parallel to moving trains on the portion of 46th Street adjacent to the commentor's property. Based on the outcome of the meeting held with the commentor on January 9, 2025, Metro will research safety devices and barriers that could be incorporated into the design to prevent a collision with trains as cars exit the |

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| | Stacy Medical Center/Wells Fargo Building Parking Lot on 46th Street (while a train is present). Metro also committed to research potential roadway design modifications that could potentially allow a right-hand turn while a train is passing through the 46th Street/Pacific Boulevard intersection.<br><br>Please refer to the Comment IND 33-1 response and Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the |

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| | | total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |
| | **IND 33-3** | Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. Please also refer to Comment 33-1 response for discussion regarding traffic delay and job accessibility.<br><br>Please also refer to Key Issue Response #3 for a discussion related to the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and |

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| | associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4. |

**Comment Number:** IND 34

**Name:** Nikki

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

Hi, everyone.· I am Nikki.· I am an analyst for the great State of California.· I am not a transportation planner for this state.· But my office does work very closely with the Governor's office of planning and research.· So I am pretty well-versed in the California Environmental Quality Act. In fact, you guys have all been calling it as CEQA and I feel like that's actually really disrespectful.· Let's call it the California Environmental Quality Act, CEQA, has actually codified into our state regulations, because it's an important aspect to consider when planning to invest in densely-populated areas. I actually want to read you CEQA.· It says public participation is an essential part of the CEQA process.· Each public agency should include provisions in CEQA procedures for wide public investment.· Emphasis on the "wide public involvement" -- I am sorry -- formal and informal consistent with its existing activities and procedures in order to receive and evaluate the public reactions to environmental issues related to the agencies' activities. IND 34-1

Now I served as a reviewer for several state-funded·projects, up and down the coast.· I am appalled and disgusted at Metro's process for community engagement in a historic district such as Boyle Heights and Vernon.· This community deserves so much more than this pitiful process that Metro has engaged in. I have such disappointment in the California Transportation Agency for even allowing the project to get this far with Metro as the lead.· When everyone in this room knows, Metro has their own problems with management, their own problems with ridership. I don't believe a word in this report about congestions that will be alleviated because ridership is expected to increase. Everything I can see tells me ridership has fallen and it's because Metro isn't safe. IND 34-2

## IND 34 Nikki

**IND 34-1** Metro acknowledges that clear and timely communication is essential and is committed to meaningful engagement with stakeholders and providing multiple methods to fully inform the public of major Project milestones, including the 45-day public comment period for the Draft EIS/SEIR.

Please refer to Key Issue Response #1 for a discussion of stakeholder engagement activities conducted in the City of Vernon to support the environmental review process for the Malabar Yard railroad improvements.

**IND 34-2** Metro is committed to fostering meaningful dialogue and involving local communities in the decision-making process. Metro acknowledges that historic areas require extra attention and are working to improve outreach methods to maximize participation from all stakeholders, particularly those in historically disadvantaged neighborhoods.

Metro values the feedback provided by the commentor and will continue to refine engagement strategies to better serve the communities potentially impacted. In addition, the Boyle Heights Chamber of Commerce, Boyle Heights Neighborhood Council - Planning and Land Use Committee, and Boyle Heights Historical Society was engaged during the environmental review process for the Project as shown in Draft EIS/SEIR Chapter 8, Public and Agency Outreach, Tables 8-1 and 8-2.

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| | In June 2024, Metro saw its 19th consecutive month of year-over-year ridership growth with 25,181,475 boardings on its bus and rail services, reaching 85.5 percent of its June 2019 pre-COVID ridership level. With 18,792,300 boardings on weekdays, ridership reached 82.1 percent of its pre-pandemic levels. Weekends in June 2024 saw 6,389,175 boardings, reaching 97.7 percent of pre-pandemic weekend ridership from June 2019. As traffic congestion returns, the demand for bus and rail transportation is expected to increase further, highlighting the importance of the Project in supporting regional mobility.<br><br>A summary of the recent ridership projections are located on Metro's website here: https://www.metro.net/about/la-metros-ridership-continues-upward-trend-in-june-marking-the-19th-consecutive-month-of-year-over-year-growth/<br><br>Safety and security measures are employed within and around LAUS through interdepartmental coordination between Metro Police, Los Angeles County Sheriff's Department, and the City of Los Angeles Police Department, which are discussed in more detail in Draft EIS/SEIR Section 3.14, Pages 3.14-10 through 3.14-11. The safety and security of other Metro lines and stations and other regional/intercity rail trains or that are operational outside of the Project Study Area are outside of the scope of the Project and Draft EIS/SEIR analysis. |

**Comment Number:** IND 35

**Name:** Marisa Olguin

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

Marisa Olguin with the Vernon Chamber of Commerce.· And we represent over 1,400 businesses and 40,000 people who come to work every single day.· We're very concerned over the proposed Metro Link US Project that would generate an influx of over 400 rail cars, slowly moving and idling along the streets of Vernon.· IND 35-1

Well, the LA Union Station will be furthered transferred or transformed to increase rider capacity into run-through track station, the current plan encroaches freight rail cars onto the streets of Vernon which will negatively impact air quality, devastate business operations, reduce property values, and puts the safety and health for commuters, pedestrians, schoolchildren, and churchgoers at risk for less than one mile away from the proposed. IND 35-2

The Chamber is very concerned over the data gathered during COVID.· Studies really need to be redone.· It's very different from the bustling activity that's on the 46th,·49th Street, Pacific Boulevard, Soto, Santa Fe, and even Downey streets.· These are major thoroughfares.· Public outreach and studies were conducted in the middle of the pandemic where ·business's operations were shuttered in crisis and offered minimal participation to thoroughly vet the proposed plan. IND 35-3

More concerning is the plan did not take into account the city's ·recent general plan and zoning ordinance update that will soon usher in new housing and retail developments along the streets of Santa Fe and Pacific Boulevard directly within the mile radius. As Angelenos, we all want to applaud and celebrate a beautifully transformed Union Station and set the stage for a long-awaited high-speed rail system, but to clear the freight rail cars at Union Station at the expense of Vernon employers and the workers who come to work every single day is not acceptable. We encourage Metro and BNSF and the City of Vernon to work together collaboratively on a safer and more environmentally friendly plan that will sustain Vernon's economy, jobs, and the health and welfare of Vernon working as a residential community. IND 35-4

## IND 35 Marisa Olguin

**IND 35-1** Metro recognizes the unique economic and industrial importance of Vernon, with its 40,000 employees, 1,400 businesses, and interconnected network of operations. The responses below address the comments related to the total number of rail cars expected to move along the 46th Street Connector, reduced train frequencies in Vernon, traffic delay, and air quality.

- Total Number of Rail Cars on 46th Street Connector - Trains operating on the 46th Street Connector would be up to 3,000 feet long (similar to the existing condition) and not expected to result in 400 new rail cars out of the east entrance of Malabar Yard. Using the typical number of rail cars travelling on the 46th Street Connector (Draft EIS/SEIR Appendix Q, Section 2.3.3) and the length of each train anticipated to operate on the 46th Street Connector (up to 3,000 feet as clarified in Key Issue Response #2), each train is expected to carry up to 45 cars. Based on the future Project-related train movements that would operate on the 46th Street Connector (4 daily train movements), up to 180 rail cars would move along the 46th Street Connector per day as a result of the Malabar Yard railroad improvements. As disclosed in Key Issue Response #2, half of the trains operating on the 46th Street Connector (with 90 of the total 180 rail cars) would operate during the night (7:30pm to 2:00am).

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| | • Consolidated Freight Service and Reduced Train Frequencies - The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from Los Angeles Junction. Daily train movements on the Harbor Subdivision (parallel to Santa Fe Avenue) would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Key Issue Response #2, Table 2 and Figures 7 and 8). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent fewer train movements on the Harbor Subdivision (parallel to Santa Fe Avenue). In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day).<br><br>With the Malabar Yard railroad improvements, 3.15 fewer trains would operate in the City and half of the train movements would occur at night, which have very little to no impact on traffic. For trains operating during the day, if a train movement occurs during the AM and PM peak periods, there could be some effect, but trains are not anticipated to operate at the same time every day and are not all occurring during the AM or PM peak periods. The hourly schedule to |

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| | service Vernon customers fluctuates and is variable throughout the week based on customer demand.<br><br>In March 2025, Metro facilitated a Community Meeting/Open House in the City of Vernon. Multiple comments were raised by the community regarding the duration of time that intersections could be blocked by freight trains. In response to these comments, in April 2025 Metro installed cameras at multiple locations throughout the City to record continuous train activity over the course of a week (April 19–25, 2025), 24-hours per day.<br><br>Applying the video footage collected, Metro performed an intersection delay/blockage analysis to document intersection delay/blockage which would occur in the existing condition and with implementation of the Malabar Yard railroad improvements. Metro presented the results of the intersection delay/blockage analysis on June 17, 2025, to the Vernon City Council and on June 23, 2025, to the Vernon Chamber of Commerce. Multiple property owners and business representatives attended both meetings.<br><br>Based on the video data collected, results were summarized for two conditions (Actual Condition [based on observed train activity] and Worst-Case Condition) to determine how the Malabar Yard railroad improvements would change intersection delay/blockage at eight locations and effects to citywide |

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| | vehicular circulation. Results are summarized below:<br>1. Actual Condition (based on observed train activity)<br>a) Length of Observed Trains: 350 feet to 1,500 feet<br>b) Daily Intersection Blockage Results: With Malabar Yard railroad improvements, daily intersection delay/blockage would be reduced by 30 minutes.<br>2. Worst Case Condition (consistent with NEPA/CEQA EIS/SEIR evaluation)<br>a) Length of Longest Potential Trains: 3,000 feet<br>b) Daily Intersection Blockage Results: If longer trains are needed due to customer demand in the City of Vernon, the corresponding reduction in daily intersection blockage with the Malabar Yard railroad improvements would also increase as compared to the existing condition. Assuming 3,000-foot trains would operate on any given day, daily intersection delay/blockage would be reduced by over 1 hour and 20 minutes. This reduction is based on the assumption that in the existing condition trains would operate with the same length (3,000 feet) without the |

Malabar Yard railroad improvements.

Based on the train observations conducted in April 2025, the data supports the conclusion that with implementation of the Malabar Yard railroad improvements, a citywide circulation improvement would occur. This is primarily because:

- 3.15 fewer trains would operate in the City of Vernon (10 Current/6.5 Future), and
- In the current condition, BNSF's "train building" activities occur on City streets north of Malabar Yard (Pacific Avenue), which triggers a substantial amount of time when railroad gates are down, delaying/blocking vehicular traffic. With the implementation of the Malabar Yard railroad improvements, most train building activities will be relocated to BNSF's Los Angeles Junction (LAJ) rail yard on the east side of the City.

- Mitigation Measures to Reduce Traffic Delay - In regard to traffic delays, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue – operations, and Fruitland Avenue – operations); thereby causing a potential delay that would be considered an

adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such the local community will not be severely impacted by traffic delays that would affect accessibility to mentioned destinations (jobs and childcare).

- Vehicle Idling and Local Air Pollution - Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4.

Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements and develop solutions that preserve the city's economic vitality, improve citywide

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| | | circulation, and improve community connectivity to the extent feasible. |
| | **IND 35-2** | The Build Alternative and Build Alternative Design Option would increase regional/intercity rail capacity at LAUS to support the forecasted increase in ridership, and support more sustainable transportation options for the region. Metro recognizes that increased freight operations on 46th Street can present concerns, and Metro is committed to minimizing impacts on the community to the extent possible.<br><br>Please refer to Comment 35-1 response for a discussion on consolidated train movements/reduced train frequencies in Vernon, traffic delay, and vehicle idling and air pollution. The responses below address the comments related to operational and physical impacts to businesses, property values, and the public safety and health for commuters, pedestrians, school children, and churchgoers.<br><br>• Operational and Physical Impacts to Businesses - As discussed in Key Issue Response #5, some job loss resulting from potential building demolition may occur; however, as part of Metro's Relocation Assistance Program and the Uniform Relocation Act benefits processes, any businesses subject to building demolition or displacement would be compensated or referred to potential and/or suitable replacement sites. Parking impacts may occur, and when considering both context (total spaces available) and intensity (number of spaces removed), no adverse effect |

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| | would occur because the properties would still be usable. Operational and physical impacts to businesses would be minimized by implementing Design Option 2, as the preferred design option, at both locations – 46th Street and 49th Street.<br><br>The comments provided on the Draft EIS/SEIR with regards to impacts on businesses in the City of Vernon have been taken into consideration and coordination with the City of Vernon and business stakeholders will be ongoing to minimize the extent of impacts during construction and operation.<br><br>• Property Values - The Malabar Yard railroad improvements would facilitate safe and legal access to businesses. Property values would not be reduced because uses on the parcels could be maintained and fair compensation would be provided for any required acquisitions.<br><br>• Public Safety and Health - The 46th Street Connector includes new railroad signals, flashers, gates, medians, curb line expansions, sidewalk/ramps, and driveway improvements at existing at-grade crossings on Pacific Boulevard, 46th Street, and Seville Avenue, as well as at the new at-grade crossing at Seville Avenue and 46th Street. Potential safety hazards associated with the new at-grade crossing at Seville Avenue and 46th Street are addressed in the Draft EIS/SEIR. Potential roadway safety devices that may be considered for |

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| | future implementation (Malabar Yard Mitigation Measure TR-6) include queue cutter traffic signals or pre-signals for the new railroad crossing on Seville Avenue. These types of railroad safety improvements would enhance safety for commuters, pedestrians, school children, and churchgoers that utilize these intersections and railroad crossings.<br><br>As discussed in Appendix Q Section 3.14, Page 3.14-24, all Malabar Yard railroad improvements would be designed and constructed to comply with FRA and CPUC standards and specifications to maximize safety for both motorized and non-motorized forms of transportation. The Malabar Yard railroad improvements do not facilitate any changes to train speeds.<br><br>The Draft EIS/SEIR Section 3.5 and Draft EIS/SEIR Appendix G both discuss the potential impacts related to pollution (air quality, climate change, and health risk) associated with the Build Alternative and Malabar Yard railroad improvements combined and the Build Alternative Design Option and Malabar Yard railroad improvements (Final EIS Chapter 9, Section 9.13-2). As discussed in Key Issue Response #3, based on South Coast Air Quality Management's (SCAQMD) definition, sensitive receptors are identified as locations where an individual could remain for 24 hours and includes land uses such as residences, schools, playgrounds and |

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| | athletic facilities on school property, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes.<br><br>Based on the type of infrastructure improvements proposed, a buffer of one-quarter mile is used to identify sensitive receptors for further consideration of potential impacts. The nearest sensitive receptors identified and considered in the air quality analysis for the Malabar Yard railroad improvements were:<br><br>o Residences at 2415-2427 E 53rd St. (located approximately 1,325 feet [0.25 mile] south of the Malabar Yard railroad improvements),<br><br>o Vernon City School at 2360 East Vernon Avenue (located approximately 1,350 feet [0.25 mile] northwest of the Malabar Yard railroad improvements), and<br><br>o Residences on Furlong Place (located approximately 1,650 feet [0.31 mile] northwest of the Malabar Yard railroad improvements).<br><br>Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling (which includes truck idling) associated with the Malabar Yard railroad improvements. The proposed Malabar Yard railroad improvements would result in the |

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| | consolidation of local freight rail service so that all BNSF customers in the city are served from the Los Angeles Junction. The consolidated train movements would result in 78 percent less train movements on the Harbor Subdivision coming from/to the San Bernardino Subdivision. Thus, fewer train movements on the Harbor Subdivision equates to less vehicle idling (including truck idling) at each of the at-grade crossings where sensitive receptors are located, such as the Vernon City School. Because the implementation of the 46th Street Connector would shift freight rail activity away from sensitive receptors, vehicle idling (including truck idling) at Malabar Yard would be so minimal it would not cause a violation of any air quality standard.<br><br>General Conformity is the pollution prevention and control program that requires a federal agency to assure any proposed activity the agency proposes will conform to the purpose of applicable implementation plans and will not interfere with a State or Tribe's ability to attain and maintain the National Ambient Air Quality Standards (NAAQS) for air quality, as required under Clean Air Act (CAA) section 176(c).<br><br>The purpose of the General Conformity rule is to ensure that:<br>o federal activities do not cause or contribute to new violations of |

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| | National Ambient Air Quality Standards (NAAQS);<br>○ actions do not worsen existing violations of the NAAQS; and<br>○ attainment of the NAAQS is not delayed.<br><br>As demonstrated in the Final EIS pages 3.5-26 to 3.5-34, RONA, and Appendix G of the Final EIS, the annual construction emissions and annual net change in operational emissions for all analysis years generated by the Build Alternative and Malabar Yard railroad improvements, as compared to the No Action Alternative, are below the general conformity *de minimis* levels for all years of analysis with implementation of mitigation. As such a formal general conformity determination with additional localized analyses are not required. The Build Alternative and Malabar Yard railroad improvements would not interfere with the state's plans to attain and maintain the NAAQS. A detailed $PM_{10}$ and $PM_{2.5}$ hot-spot analysis was not completed because FCAA and 40 CFR 93.116 requirements would be met without an explicit hot-spot analysis.<br><br>As detailed in the Key Issue Response #3, localized air quality impacts were evaluated using the localized significance threshold methodology from SCAQMD. This methodology sets a screening level threshold based on the pollutant ($NO_x$, CO, $PM_{10}$, $PM_{2.5}$) and the distance to the nearest air quality |

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| | sensitive receptor in that source receptor area (location). On-site emissions are calculated and then compared to these thresholds. SCAQMD uses the localized significance threshold (LSTs) to evaluate if projects qualify to be screened out from the requirement to conduct project-specific dispersion modeling. If required, the purpose of dispersion modeling is to demonstrate that a project would not delay attainment of ambient air standards. If a project's on-site emissions are below the LSTs, then no further analysis with dispersion modeling is required. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of an ambient air standard.<br><br>As indicated in Draft EIS/SEIR Chapter 7, Table 7-31 criteria pollutants would not exceed SCAQMD thresholds during construction or operations and air quality impacts associated with the Malabar Yard railroad improvements would be less than significant. Regarding localized emissions, the Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. On-site construction emissions at Malabar Yard were compared to SCAQMD localized significance threshold (LST) and were found to be below the thresholds for all criteria air pollutants (NOx, CO, $PM_{10}$, $PM_{2.5}$) (see Appendix F of the Final EIS Appendix Q). Air quality impacts to sensitive receptors further away from the |

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| | emission source would be less likely to be impacted than those identified through the localized analysis. Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.<br><br>As discussed above in Comment 35-1 response, the long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4. In addition to the regional air quality benefits, from a localized perspective, implementation of the 46th Street Connector would shift some freight rail activity away from sensitive receptors, such as the Vernon City School and the residences on Furlong Place, and toward the industrial warehouses to the east because fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard.<br><br>The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train |

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| | movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*. |
| | **IND 35-3** Metro recognizes that the COVID-19 pandemic temporarily altered traffic patterns, economic activity, and operational dynamics, which affected the method for data collection during this period.<br><br>As discussed in Key Issue Response #2, a COVID factor was used to estimated traffic conditions in 2020 without COVID-19. The approach to normalize the traffic count data collected in August 2020 during the COVID-19 pandemic to the traffic levels that existed pre COVID-19 is presented in Draft EIS/SEIR Appendix Q Section 3.3, Transportation, Page 3.3-4 and summarized in Key Issue Response #2. This methodology is an industry standard approach taken during the COVID-19 pandemic and was coordinated with the City of Vernon to obtain feedback on the approach before using the adjusted volumes in the traffic analysis. The traffic volumes presented in Draft EIS/SEIR Appendix Q represent the baseline condition at the time the environmental evaluation commenced and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes. |

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| | The commenter provides no basis for why studies need to be redone, as current information with an appropriate level of detail was used in the Draft EIS/SEIR environmental evaluation. Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements and develop solutions that maximize safety and preserve the city's economic vitality and connectivity.<br><br>In 2020 and 2021, Metro coordinated with the City of Vernon and the Vernon Chamber of Commerce to obtain feedback on the stakeholder engagement approach, to identify stakeholders that may be affected or have interest in the Project, and to support Metro in disseminating information related to the environmental review process for the Malabar Yard railroad improvements.<br><br>On June 23, 2025, Metro took the opportunity to present to the Vernon Chamber of Commerce the draft responses to comments that would be presented in the Final EIS, share the progress of the meetings held with the City of Vernon, affected property owners/tenants, and other community members, and to provide information related to the changes in train movements and citywide circulation improvements, offsetting mitigation measures, and the environmental review process for the Malabar Yard railroad improvements. |

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| | Metro remains committed to transparency and accuracy. If there are specific data points or conclusions that require further review and discussion with the project team, Metro looks forward to being provided additional details. Metro will continue to engage with stakeholders to ensure the final decisions are based on robust and comprehensive analysis. |

Since I have more time, looking at the EIR report, I do see some major adverse effects and impacts on the environment, transportation, fiscal and economic impact, noise and vibration. We completely see the opposite.· We will be making those comments in writing.· And just thank you.

IND 35-5

**IND 35-4** The *2023 Vernon Westside Zone Change and General Plan Amendment* (adopted July 2023) was not considered in the Draft EIS/SEIR environmental evaluation because the zone change and amendment was not formally adopted at the time the Revised NOI was issued in September 2020. As required by 40 C.F.R. 1502.16(c), Metro performed a consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023) for inclusion in the Final EIS. Based on the analysis performed in the Final EIS Volume III Introduction Table 5, the Malabar Yard railroad improvements were determined to be consistent with the goals and policies within the *2023 Vernon Westside Zone Change and General Plan Amendment*. Therefore, no conflict would occur with implementation of the Malabar Yard railroad improvements.

The Malabar Yard railroad improvements would facilitate consolidation of freight service in the city from Los Angeles Junction; thereby reducing the total daily train movements on the Harbor Subdivision parallel to Santa Fe Avenue where future mixed-use development is planned. This reduction of train movements would result in a benefit of localized air emissions and noise and vibration reductions to nearby sensitive receptors that are currently present, in addition to future sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.

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| | In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Draft EIS/SEIR. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis.<br><br>Metro acknowledges the importance of considering updated planning and zoning regulations when evaluating the environmental impacts of the Malabar Yard railroad improvements. For these reasons, Metro and the City of Vernon staff have been working collaboratively to develop solutions that preserve the city's economy, jobs, and the health and welfare of its current and future residents and workers. |

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| | **IND 35-5** The comment states that additional issues will be raised in writing. Metro has reviewed the written documents received by the Vernon of Chamber of Commerce and responses to all comments are provided in response to comments designated as ORG-12. |

**Comment Number:** IND 36

**Name:** Mario Dominguez Jr.

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

Yeah. Hello, my name is Mario Dominguez, Junior. I am resident of South Gate. Okay. So I love the presentation. It's a very ambitious project. And I want it. I am all for connectivity projects, things that are going to help people and use our mass transportation system. IND 36-1

But what saddens me is this -- you know, everyone is talking about Vernon. I mean, this is heartbreaking. I don't want to see any businesses go under and, you know, city of Vernon go into ruin. I mean, it looks -- the impression I am getting from the folks talking is that this project is going to murder and kill the city of Vernon. And if that is the case, I am sorry that's going to happen, but I guess that's progress for, you know. I hate to see you go, Vernon, but it was nice having you. IND 36-2

But I want to say, if Metro is going to proceed with this project, you need to attack it and hit it hard. Hit it like it fucking hurts. I saw that there was one brat where you had, like, three segments, well, why not have multiple crews working at the same time. The reason why I say this is because I want rapid completion of this project. I want you to hit it, hit it hard and have multiple crews going so we can get this thing done. The thing I'll -- my only concern is if you're going to build this, you got think this earthquake thing through. I don't want this thing to collapse in a 6.0 so you gotta really build this sucker to withstand earthquakes. IND 36-3

And I want to ask the project manager McConnell: Is this project be fully funded? And when do you expect to have this thing up and running online for the public so we can make use of it? That's all I have. Thank you. IND 36-4

## IND 36 Mario Dominguez Jr.

**IND 36-1** Metro appreciates the commenter's support for the Project.

**IND 36-2** The commenter expresses concern for the businesses in Vernon. The socioeconomic impact analysis of the Malabar Yard railroad improvements, including an analysis of business displacements and the economy can be found in the Draft EIS/SEIR Appendix Q, Section 3.15, Page 3.15-21. The analysis concludes that the Malabar Yard railroad improvements could potentially cause one business relocation under Design Option 2, although, overall, it would cause a beneficial economic effect because the Malabar Yard railroad improvements would generate employment, labor income, and tax revenues.

**IND 36-3** The detailed construction phasing schedule and timelines will be developed during final design.

Draft EIS/SEIR Section 3.9 includes an evaluation of the potential impacts related to seismicity during the construction and operation of the Project. As stated in Draft EIS/SEIR Section 3.9, Page 3.9-15, construction safety protocols, in accordance with OSHA requirements (e.g. Construction Safety Orders, Articles 1 through 37), would be implemented during construction to prevent risk of loss, injury, or death if seismic activity is encountered during construction. Project infrastructure would be designed and constructed to be seismically sound, in

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| | | accordance with appropriate industry standards, including established engineering and construction practices (Draft EIS/SEIR Section 3.9, Table 3.9-1 for the Build Alternative and Final EIS Table 9-12 for the Build Alternative Design Option). Based on these design criteria, the design moment magnitudes are anticipated to be greater than 6.0 |
| | **IND 36-4** | As stated in Draft EIS/SEIR Chapter 2 Section 2.4 for the Build Alternative and Final EIS Section 9.8 for the Build Alternative Design Option, implementation of infrastructure improvements would generally occur in two main phases that are evaluated as scenario years (the interim condition and the full build-out condition). Infrastructure improvements as part of the interim condition aligns with a construction completion date as early as 2026 and as early as 2031 for the full build-out condition. Metro has funding to implement infrastructure improvements as part of the Build Alternative Design Option that align with the interim condition. The full build-out condition is currently unfunded. |

**Comment Number:** IND 37

**Name:** John Rhee

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

My name is John Ree. I am the property owner of the southeast property on 46th and Seville. It is a newly constructed three stories, 60,000 square foot building. I had several meetings with LA Metro and met substantially and even had architects involved in 2020 and 2021. I gave them my design, and they stopped responding after April of 2021. Since then, I built a really large building and now with your option 1 and option 2 you required a taking of that entire building in the demolition of that structure. IND 37-1

Your EIR reports says there's minimal adverse effects of mitigation in the climate change. Well, I did a rough calculation, the building and the destruction of my building, would be around you know, 1,300 metric tons of steel. I think your EIR report is severely flawed. IND 37-2

I think macro point is a lot of the comments made so far, having related to the Malabar Yard extension or improvements and the reason that is the case is because the impacts of that is disproportionate, I think, to not every resident and business owner of Vernon. I think as a whole when you look at it, you're getting, you now, you're taking, like, 5,000 feet of rail from BNSF, and you're giving them the City of Vernon and it's impacting a lot of people, and a lot of people here are upset about it. And that's why you don't have other comments about the improvements or maybe the taking next to Chinatown. IND 37-3

So I have a solution for everybody. The LA Junction was considered in your EIR. And in the Los Angeles Junction, one of the reasons why that is not a good candidate, it doesn't meet your second criteria is because there are multiple properties there. Well, that's a lot less impactful economically and disrupts economic livelihood of the city than your Malabar Yard project which would require the acquisition of dozens of businesses. IND 37-4

## IND 37 John Rhee

**IND 37-1** The commenter is correct that Metro did hold several meetings with the property owner in 2020 and 2021; however, the project was placed on hold in April 2021 until January 2023 when Metro elected to prepare a Supplemental EIR for the Project. Stakeholder engagement activities in the City of Vernon were not conducted from April 2021 through April 2024 as Metro was dedicated to drafting environmental documents that were substantive and meaningful for public and stakeholder consideration and feedback. Reinitiation with the property owner commenced again in December 2024 when Metro and Link US Project Team met with the commentor.

During the December 18, 2024, meeting conducted with the property owner, Metro provided exhibits to demonstrate full acquisition of the triangular shaped parcel owned by the commentor (APN: 6308-002-017) is required to implement the 46th Street Connector; however, acquisition of the larger parcel owned by the commentor (APN: 6301-002-016) or demolition of the building on this parcel is not required or proposed to implement the 46th Street Connector under Design Option 1 or 2. The triangular portion of property (APN: 6308-002-017) is needed to place necessary rail tracks and ancillary equipment to implement the 46th Street Connector. No temporary construction easement or permanent easements are anticipated to be

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| | | required on the larger parcel owned by the commentor (APN: 6301-002-016).<br><br>Metro relayed that the existing crossing on Seville Avenue just south of 46th Street can remain as existing and require no revisions to existing passive warning devices. Therefore, the medians and gate arms initially proposed on the north and south sides of the existing crossing adjacent to 4620 Seville Avenue are no longer required nor proposed as part of the 46th Street Connector . |
| | **IND 37-2** | Please refer to Comment IND 37-2 response. Acquisition of the parcel owned by the commentor (6301-002-016) or demolition of the building on this parcel is not required or proposed to implement the 46th Street Connector; therefore, quantification for air quality emissions related to the demolition of the new building constructed on this property was not calculated. |
| | **IND 37-3** | Metro took seriously the concerns about impacts on property owners, and it developed Design Option 2 to reduce those impacts. Ultimately, the Metro Board of Directors and the CHSRA Board of Directors will consider the No Action Alternative and balance the costs and benefits before reaching decisions on whether to implement the Build Alternative or Build Alternative Design Option and the Malabar Yard railroad improvements. Metro and CHSRA have considered the comments and concerns provided on the Draft EIS/SEIR and have engaged experts to analyze the likelihood of the impacts the commenters have identified, |

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| | not only at the formal Public Hearing but in other written comments throughout the multi-year-long process Metro has undertaken to plan and environmentally-clear the Project.<br><br>Metro is not proposing to give the entirety of the City of Vernon to BNSF. A loss of 5,500 feet of storage track capacity at the BNSF West Bank Yard would occur during construction and remain throughout operations. To offset loss of storage track capacity, the 46th Street Connector and 49th Street Closure are proposed as mitigation to maintain freight railroad operations. The purpose for implementing Malabar Yard railroad improvements is to comply with NEPA and CEQA's requirement to mitigate the Project's adverse effects resulting from permanent loss of approximately 5,500 feet of freight storage track capacity (40 CFR 1502.14(f), 40 CFR 1502.16(h); CEQA Guidelines §15126.4(a)). A project's impact on freight is an environmental topic required for consideration in an EIS using FRAs Environmental Procedures.<br><br>The comment is ambiguous in referencing a "taking next to Chinatown," so Metro is unable to respond to that comment.<br><br>Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements during construction and operation and develop solutions that preserve the city's economic vitality and connectivity to the extent feasible. |

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| | **IND 37-4** The commenter's assertion that the Malabar Yard railroad improvements would require dozens of business acquisitions is inaccurate. Design Option 2 at 46th Street and 49th Street was proposed to reduce impacts on adjacent properties and businesses. As discussed in the Draft EIS/SEIR Appendix Q, Section 3.13, Design Option 1 at 46th Street and 49th Street would result in the potential acquisition and associated displacement of three businesses resulting from full demolition of two buildings and partial demolition of one building on three parcels. Design Option 2 at 46th Street and 49th Street would only result in the potential acquisition and associated displacement of one business on one parcel and one potential acquisition of a parcel with a five paved parking spaces.<br><br>For parcels where no demolition may occur, Metro expects the businesses would remain operational during construction and throughout operations because both proposed configurations of the 49th Street Closure and the 46th Street Connector (Design Option 1 or Design Option 2) would be designed in a manner that would allow businesses access to be maintained. While construction activities would result in temporary access disruptions to businesses, implementation of a TMP (Malabar Yard Mitigation Measure TR-1) would minimize access restrictions to nearby businesses when road closures are required.<br><br>The Los Angeles Junction location was not considered feasible because it does not meet |

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| | the secondary screening criterion as stated in Draft EIS/SEIR Appendix Q, Section 1.1 Page 1-14. The Los Angeles Junction does not have enough available land area to accommodate additional storage track capacity for empty bare tables in its current configuration because all space available at Los Angeles Junction is occupied by existing merchant trains that currently operate from this location to serve local customers. As shown in the Final EIS Appendix Q, Section 1.1.1, Figure 1-3, and discussed on Page 1-14, expansion of the Los Angeles Junction to accommodate additional storage tracks would require full parcel acquisition of seven private properties with active businesses/buildings. This magnitude of impacts on businesses in Vernon would be greater than the impacts associated with the design options considered for the Malabar Yard railroad improvements. Design Option 2 for the 49th Street Closure and 46th Street Connector is part of the preferred alternative because it reduces property impacts of other alternative sites considered. |

I encourage Metro, California, and whoever governing bodies to do an accurate economic assessment on what it will actually cost to do Malabar Yard improvements. It'll be the fraction to take or to do the improvements of LA Junction than what you guys propose to do. I have other things related to BNSF that I will comment on in written form. Thank you. (Background noise/phone rings.) What I wasn't able to squeeze in there is that on my property existing BNSF rail runs through it. IND 37-5

They re-laid that rail in 2020. BNSF did not observe the PUC regulations on the setbacks. I know this because after I started building my building, erecting massive concrete walls, they told us to tear it down and move it somewhere else, because they said we did not observe proper setbacks. Our surveyors went out there and their surveyors went out there. BNSF laid rails in the wrong place so a lot of the improvements of Malabar Yard are premised on rail that is in the incorrect place in violation of PUC regulations, jeopardizing the safety of all the people in the area. (Unintelligible) so these grand -- these massive plans are premised on a massive safety risk that BNSF is aware of. And we know they're aware of because they told us to stop our building and to move the walls that have been laid. And so I encourage LA Metro to do a lot further digging on this Malabar Yard project, not just for the benefit of Vernon, but more selfishly for my benefit because there are a lot bad issues here. IND 37-6

And at the end of the day, I think there would be a very ugly fight played out in the court and in the media. Feel free to reach out to me. IND 37-7

**IND 37-5** A comprehensive economic and fiscal impact assessment and cost estimate for the Build Alternative in Draft EIS/SEIR Section 3.13 and Appendix O, for the Build Alternative Design Option in Final EIS Chapter 9.0, and for the Malabar Yard railroad improvements in Draft EIS/SEIR Appendix Q. A balanced analysis was performed to determine the conclusions presented in the Draft EIS/SEIR based on the local and regional impacts from short term construction spending, as well as long term impacts related to potential job displacement and lost property tax revenues due to the required ROW acquisitions and associated building demolition (if required).

**IND 37-6** Metro researched the commenters' assertions by conducting an aerial imagery analysis of the property and its relation to BNSF tracks from March 2017 to June 2023. The following observations were made:

- March 2017 – Both sites appeared vacant, with BNSF tracks converging into a turnout, transitioning from two tracks to a single track between the sites.
- April 2019 (before the property owner's building was constructed) – Both sites appeared vacant, with the BNSF turnout removed, and two tracks traverse through the properties. The second track appeared to have been shifted to the northwest, away from the proposed building.
- August 2021 – Site grading was visible, indicating preparation for the building

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| | construction on the property was underway.<br>• March 2023 – Construction of the building was in progress.<br>• June 2023 – The building construction southeast of the tracks appeared to be completed.<br><br>The existing BNSF tracks, which were in place prior to the building construction, currently meet CPUC horizontal clearance requirements. Following the construction of the building on the property, BNSF installed "Close Clearance" signs as a precaution, and crews are restricted from riding locomotives or cars past this location. The Draft EIS/SEIR includes a consideration of both the existing building and tracks, using up-to-date information to assess the environmental impacts of the Project related to the property.<br><br>**IND 37-7** The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIS/SEIR. |

**Comment Number:** IND 38

**Name:** Richard Lucas

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

Thank you. Thank you, John. I feel really sorry for you especially having approached or having BNSF and Metro discuss this and then not follow through. I am Richard Lucas with CEG Construction. We designed and built John's building. Very successful project. Very beautiful building. One of the prettiest buildings in the city. IND 38-1

The railroad track that BNSF built violates the CPUC. It's too close to the property line -- too close to John's building. It's unsafe. It cannot be used. IND 38-2

Four hundred cars coming out of 46th Street. Your environmental impact report did not go beyond the Malabar Yard and the 46th Street area. It is inadequate. It is improper and quite frankly it's appalling, it did not include crossing Soto, Boyle, (unintelligible), and Downey roads. The impact report needs to be redone based on current statistics, traffic counts, outreach of the property owners, all through the city where 400 new cars are going to be traveling every day. There are properties that the City of Vernon building department approved as fire department access along the railroad right-of-way because it was not used. And no impact was -- no environmental impact was performed to determine what effects that's going to have on fighting the fires of these buildings that require that access. IND 38-3

Fire department access is going to be stopped from east to west, north to south. It's going to be a big, big issue. The environmental impact regarding the noise, vibration, and emissions is flawed. It's based on 400 new cars. The impact report says we're going to use state-of-the-art equipment, possibly new battery-powered equipment? That's irrelevant. What's going to happen with 400 new rail cars impacting the City of Vernon? It's going to shut it down.

Property values -- I got property owners -- building owners that want to have us build their new buildings, especially cold storage -- that are no longer going to complete the project because of this interruption and access. They can't do it. Rail cars are going to stop access to their buildings. That needs to be determined. The effect, the solution is to, as John suggested, do not do the expanse in the City of Vernon; do it in LA where the current railcar yard is. Make modifications; improve the – IND 38-4

## IND 38 Richard Lucas

**IND 38-1** Metro appreciates the comments regarding the perceived lack of follow through on previous discussions with BNSF and Metro. Metro has been coordinating with BNSF and the City of Vernon during the planning, environmental clearance and design of the Malabar Yard railroad improvements and recognizes the importance of addressing concerns directly so that any issues raised are thoroughly considered and resolved to the extent possible. The commentor's feedback is valuable, and Metro remains committed to minimizing impacts on the community and businesses in Vernon.

**IND 38-2** Please refer to the Comment IND 37-6 response for a discussion of the property and its relation to BNSF tracks. As discussed in that response, the existing BNSF tracks, were in place prior to the building construction and currently meet CPUC horizontal clearance requirements. Following the construction of the building on the property, BNSF installed "Close Clearance" signs as a precaution, and crews are restricted from riding locomotives or cars past this location.

**IND 38-3** Trains operating on the 46th Street Connector would be up to 3,000 feet long (similar to the existing condition) and not expected to result in 400 new rail cars out of the east entrance of Malabar Yard. Using the typical number of rail cars travelling on the 46th Street Connector (Draft EIS/SEIR Appendix Q, Section 2.3.3) and the length of

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| | each train anticipated to operate on the 46th Street Connector (up to 3,000 feet as clarified in Key Issue Response #2), each train is expected to carry up to 45 cars. Based on the future Project-related train movements that would operate on the 46th Street Connector (4 daily train movements), up to 180 rail cars would move along the 46th Street Connector per day as a result of the Malabar Yard railroad improvements.<br><br>The responses below address the comments related to the localized traffic analysis conducted and the intersections and roadway segments considered, the COVID-19 factor methodology applied to normalize traffic counts, life safety and emergency response, noise and vibration, air quality, and use of state-of-the-art equipment for regional/intercity rail passenger trains at LAUS.<br><br>• Localized Traffic Analysis Conducted /Intersections and Roadway Segments Considered - The Draft EIS/SEIR includes a thorough and comprehensive evaluation of potential adverse effects from implementation of the Malabar Yard railroad improvements, including traffic and transportation effects associated with railroad operations. The anticipated traffic redistribution and change in traffic along with the list of study intersections and roadway segments patterns was coordinated with the City of Vernon to obtain feedback on the approach before the traffic analysis was performed.<br><br>As discussed in Key Issue Response #2, due to the Project related re distribution |

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| | of existing traffic, a localized traffic analysis was conducted for intersections and roadway segments within the proximity to the Malabar Yard railroad improvements where traffic redistribution is expected to occur.<br><br>With the Malabar Yard railroad improvements, 3.15 fewer trains would operate in the City and half of the train movements would occur at night, which have very little to no impact on traffic. For trains operating during the day, if a train movement occurs during the AM and PM peak periods, there could be some effect, but trains are not anticipated to operate at the same time every day and are not all occurring during the AM or PM peak periods. The hourly schedule to service Vernon customers fluctuates and is variable throughout the week based on customer demand.<br><br>In March 2025, Metro facilitated a Community Meeting/Open House in the City of Vernon. Multiple comments were raised by the community regarding the duration of time that intersections could be blocked by freight trains. In response to these comments, in April 2025 Metro installed cameras at multiple locations throughout the City to record continuous train activity over the course of a week (April 19–25, 2025), 24-hours per day.<br><br>Applying the video footage collected, Metro performed an intersection delay/blockage analysis to document intersection delay/blockage which would |

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| | occur in the existing condition and with implementation of the Malabar Yard railroad improvements. Metro presented the results of the intersection delay/blockage analysis on June 17, 2025, to the Vernon City Council and on June 23, 2025, to the Vernon Chamber of Commerce. Multiple property owners and business representatives attended both meetings.<br><br>Based on the video data collected, results were summarized for two conditions (Actual Condition [based on observed train activity] and Worst-Case Condition) to determine how the Malabar Yard railroad improvements would change intersection delay/blockage at eight locations and effects to citywide vehicular circulation. Results are summarized below:<br><br>1. Actual Condition (based on observed train activity)<br><br>a. Length of Observed Trains: 350 feet to 1,500 feet<br><br>b. Daily Intersection Blockage Results: With Malabar Yard railroad improvements, daily intersection delay/blockage would be reduced by 30 minutes.<br><br>2. Worst Case Condition<br><br>a. Length of Longest Potential Trains: 3,000 feet |

b. Daily Intersection Blockage Results: If longer trains are needed due to customer demand in the City of Vernon, the corresponding reduction in daily intersection blockage with the Malabar Yard railroad improvements would also increase as compared to the existing condition. Assuming 3,000-foot trains would operate on any given day, daily intersection delay/blockage would be reduced by over 1 hour and 20 minutes. This reduction is based on the assumption that in the existing condition trains would operate with the same length (3,000 feet) without the Malabar Yard railroad improvements.

Based on the train observations conducted in April 2025, the data supports the conclusion that with implementation of the Malabar Yard railroad improvements, a citywide circulation improvement would occur. This is primarily because:

1. 3.15 fewer trains would operate in the City of Vernon, and

2. In the current condition, BNSF's "train building" activities occur on City streets north of Malabar Yard (Pacific Avenue), which triggers a substantial amount of time when

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| | railroad gates are down, delaying/blocking vehicular traffic. With the implementation of the Malabar Yard railroad improvements, most train building activities will be relocated to BNSF's Los Angeles Junction (LAJ) rail yard on the east side of the City.<br><br>The geographic area considered to determine potential traffic-related effects is the traffic study area. The traffic study area is shown in Draft EIS/SEIR Appendix Q Section 3.3.3, Figure 3.3-1, and demonstrates that traffic impacts at Soto Street was considered to determine if the Malabar Yard railroad improvements would increase traffic delay to a level that would exceed applicable v/c ratio thresholds.<br><br>The traffic study area does not include intersections or roadway segments between Soto Street and the Los Angeles Junction, including Boyle Avenue and South Downey Road, because the Malabar Yard railroad improvements would not generate new traffic trips and would only result in localized redistribution of existing traffic (Final EIS Appendix Q Section 3.3, Page 3.3-9).<br><br>For Boyle Avenue and South Downey Road, the four additional train movements that would pass these intersections for BNSF to serve customers on the west side of the City |

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| | of Vernon (Exxon and West Seville), two movements would occur at night (7:30pm to 2:00am) and two movements would occur during the day (6:30am to 2:00pm). These intersections were not considered because traffic redistribution is not expected to occur at these locations. Based on the queuing analysis performed and in response to property owner questions raised in January 2025, Metro conducted a calculation to determine the percentage of time in a 24-hour period that the four additional train movements per day (and the two existing trains movements) may block access to a driveway on 46th Street, which can also be used to demonstrate the overall percentage of time trains may block an intersection along the East Seville Connection from Soto Street to the Los Angeles Junction where a detailed traffic evaluation was not conducted. The calculation assumes 6 train movements per day, with a 3,000-foot train plus 500 feet on either end for gate activation and clearing, traveling at 10 miles per hour, and demonstrates that trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Based on consideration of context and intensity, no adverse effect would occur related to traffic delay at the railroad crossing intersections from Soto Street to Los Angeles Junction where Boyle Avenue and South Downey Road are located. |

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| | As presented in the Final EIS Appendix Q Section 3.3, Page 3.3-10 and in Key Issue Response #2, a queuing analysis was prepared at six locations in response to stakeholder engagement activities to determine whether the existing travel lane storage capacity is adequate to accommodate the queue formations generated from redistributed traffic. The results of the queuing analysis demonstrate for the Opening Year (2024), no increase to the queue formation would be attributable to the Malabar Yard railroad improvements with exception of northbound through movements at Railroad Crossing #4 where there is 20 feet of incremental addition to the existing queuing that already occurs. The increase in queue formation is not considered a substantial change for two main reasons: 1) the additional 20 feet of queue formation translates into less than a vehicle of queue since one vehicle queue is 25 feet; and 2) because the added queue can be adequately accommodated with the current configuration of the roadway and it would take only one cycle of phasing to clear out the additional 20 feet of incremental addition to the existing queuing that already occurs without the need for any further improvements in lane configuration.<br><br>At Railroad Crossing #6 (Downey Road south of Vernon Avenue), the |

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| | queue formation already exceeds the storage capacity in the existing condition (Table 3.3-10) and would continue to exceed the storage capacity during the 2024 No-Build scenario. The queue formation on Downey Road south of Vernon Avenue in the northbound through and southbound through direction remains the same during AM and PM peak hours.<br>• COVID-19 Factor Methodology - As discussed in Key Issue Response #2, a COVID factor was used to estimated traffic conditions in 2020 without COVID-19. The approach to normalize the traffic count data collected in August 2020 during the COVID-19 pandemic to the traffic levels that existed pre COVID 19 is presented in Final EIS Appendix Q Section 3.3, Transportation, Page 3.3-4 and summarized in Key Issue Response #2. This methodology is an industry standard approach taken during the COVID-19 pandemic and was coordinated with the City of Vernon to obtain feedback on the approach before using the adjusted volumes in the traffic analysis. The traffic volumes presented in Draft EIS/SEIR Appendix Q represent the baseline condition at the time the environmental evaluation commenced and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes. |

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| | • Life Safety and Emergency Response – Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of |

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| | Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. The Malabar Yard railroad improvements would not impede fire truck access, and no specific buildings lacking access were identified by the commentor to address in the response.<br>• Noise and Vibration - A screening assessment was performed. Per the FTA and FRA guidelines, no noise or vibration sensitive land uses are located within 1,000 feet of the project footprint (without obstructions) or within 650 feet of the project footprint (with obstructions) (refer to Draft EIS/SEIR Appendix Q Section 3.6, Figure 3.6). Due to the lack of sensitive resources within the applicable screening distances, no adverse effect on sensitive receptors would occur.<br>• Air Quality – Draft EIS/SEIR Appendix Q Section 3.5, Table 3.5-5 indicates that the annual emissions associated with construction of the Malabar Yard railroad improvements would not |

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| | exceed the *de minimis* levels. Therefore, no direct adverse effect would occur during construction. The benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4. The regional benefits to air quality and GHG emissions as a result of reduced emissions are presented in the Draft EIS/SEIR Appendix Q Section 3.5, Page 3.5-18. The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*. |

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| | Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements.<br>• State-of-the-Art Equipment - The reference to "state-of-the-art" and "battery-powered equipment" relates to the requirement for Mitigation Measure AQ-3 for regional/intercity rail trains that carry passengers at LAUS, not freight trains in the City of Vernon. Mitigation Measure AQ-3 promotes emerging technologies to reduce locomotive emissions. These measures are essential to addressing air quality impacts that may occur upon implementation of the Build Alternative or the Build Alternative Design Option. |
| **IND 38-4** | The commenter provides an indication of property owners no longer completing projects based on Project-related interruptions and access; however, no specific project locations were offered to perform a review of related to the proposed railroad improvements.<br><br>The proposed design configurations of the design options considered maintain property access and reduces property impacts. The proposed Malabar Yard railroad improvements would not impede access so much that it would prevent construction of a new building. |

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| | The portion of the BNSF West Bank Yard south of First Street that would remain unaffected by the Project would not accommodate 5,500 feet of new storage tracks. The BNSF West Bank Yard is already operational and constrained by the Los Angeles River, Metro rail tracks, and other Amtrak maintenance facilities. |

**Comment Number:** IND 39

**Name:** Adam

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

My name is Adam. I live in Downtown and I noticed there's a lot of construction around a lot of Metro locations, like on Figueroa and Washington. There's just dust being kicked up and vehicles, buses, the trains there and this is the brand-new rail there. Also, they just went through, ride that to the beach. That makes it unsafe when I can just walk there, kind of same thing on Pico and Flower, Washington, that area. IND 39-1

This is also under construction right now. We got something going on here at the William Mead Homes. I have some friends that work there. I also know some people that live there. I mean, this is a huge project. And another huge project that Metro is overseeing in Downtown Los Angeles that, I mean, we can use, you know, some kind of other plan, I guess, instead of what I've been seeing here what you've been doing with clear examples of outskirts of the city. IND 39-2

There's no need for more construction in Downtown Los Angeles. It's a nice city. It's been around for a while. Crown Hill area with a 3rd street tunnel, 2nd to Broadway, those are very nice parts of town. Which shows how it was done and how, you know, how easy something like that is. I don't see it nowadays. It's 2024 and my friends are crying. Both that live at William Mead Homes and work there, that hang out or go to the beach because of these constructions and just, you know, there's a lot of pollution already and, you know, construction brings even more of that. That's all. Thank you. IND 39-3

## IND 39 Adam

**IND 39-1** Metro appreciates the comments regarding the observations of construction activity and its impacts near Metro locations, such as Figueroa and Washington. Construction activities, including those associated with Metro projects, can temporarily generate dust and increased vehicle movement.

Metro is committed to minimizing these impacts through mitigation measures. For instance, dust control plans are implemented at construction sites, including regular watering of exposed surfaces, street sweeping, and covering materials during transport to limit airborne dust. These measures comply with local air quality regulations and aim to minimize disruption to nearby communities.

The Draft EIS/SEIR Section 3.5 addresses the commenter's concern for fugitive dust emissions associated with the Build Alternative. Draft EIS/SEIR Section 3.5, Table 3.5-5 includes the construction-related emissions combined for the Build Alternative and Malabar Yard railroad improvements and demonstrates that annual construction emissions do not exceed established *de minimis* levels for $PM_{10}$ and $PM_{2.5}$. The Final EIS Section 9.13.2 Table 9-6 presents the same information for the Build Alternative Design Option.

Although applicable levels are not exceeded for PM, Mitigation Measure AQ-1 would still be implemented as a requirement of the Link

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| | | US Final EIR and Malabar Yard Mitigation Measure AQ-1 would also be implemented pursuant to SCAQMD requirements to reduce daily fugitive dust emissions and associated air quality impacts. Implementation of Mitigation Measure AQ-1 will further reduce PM emissions by 50 percent as shown in Draft EIS/SEIR Section 3.5, Table 3.5.6 and Final EIS Section 9.13.2 Table 9-6. Mitigation Measure AQ-1 requires that fugitive dust emissions be controlled by regular watering, sweeping, soil stabilizers, wheel washing, and/or limiting vehicle speed and access in construction areas. MM AQ-1 applies to the Build Alternative and Build Alternative Design Option. |
| | **IND 39-2** | Please refer to Comment IND 39-1 response related to measures taken by Metro to reduce dust during construction. The commenter mentions “some kind of other plan,” but provided insufficient details for Metro to respond substantively. |
| | **IND 39-3** | Please refer to Comment IND 39-1 response related to measures taken by Metro to reduce dust during construction. The Draft EIS/SEIR Section 3.5 and Draft EIS/SEIR Appendix G both discuss the potential impacts related to pollution (air quality, climate change, and health risk) associated with the Build Alternative and Malabar Yard railroad improvements combined. The Final EIS Chapter 9 Section 9.13.2 addresses the Build Alternative Design Option. A cumulative analysis of impacts from other projects or industries within the City of Los Angeles and Vernon was also conducted and presented in Draft EIS/SEIR Chapter 3.16. |

**Comment Number:** IND 40

**Name:** Nikki

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

Hi, Nikki, again. I just want to issue a real quick point of clarification that anybody who can hear my voice, the input period or the process that Metro has established is not accessible. So, I know they're saying submit your comment card, but in order for them to actually read it, you need to attach your legal name to it. You need to submit an image and upload that. You also need to put your e-mail and your phone number; otherwise, your comment will never be addressed, will never be recorded. So, word to the wise, for those of you who are listening who can hear my voice. I am all about community engagement. So, in order to get the most people involved in this process, people need to speak up. Metro needs to open up this process and make it more accessible for community members with disabilities, community members who have cars. It was appalling that all of the disabled spaces underneath this building right now are not taken and they should be by community members who are being impacted by this development. IND 40-1

(Additional conversation between commenter and Metro staff was exchanged however, was not related to the Draft EIS/SEIR or technical issues requiring a response.)

## IND 40 Nikki

**IND 40-1** Comments from all individuals (names and unnamed), agencies, organizations, and tribes are accepted throughout the public comment period. The Link US Project Team provides several avenues for individuals to be able to submit comments on the Project (i.e., by court reporter, oral comment, or comment card at the Open House and Public Hearing on July 9th, 2024; via email, physical mail, project hotline, or online comment card). A full description of the public and agency outreach conducted during preparation of the Draft and Final EIS is located in Final EIS Chapter 8, Public and Agency Outreach.

Metro facilitated the July 9, 2024, Open House and Public Hearing to present the multiple methods to submit comments and guide attendees through the process of submitting comments so that all participants could share their input in a fair, orderly manner. To advertise the Open House and Public Hearing, announcements were published in local newspapers, mailed to over 6,000 individuals, and sent to national, state, and local officials and stakeholders. During the formal Public Hearing, a court reporter was also present to document the proceedings and transcribe all comments in the official record. Metro considered all input received during the 45-day public comment period before proceeding (see Final EIS Volume III). Materials were also made available to attendees of the Open House and Public Hearing including an agenda, an

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| | informational handout outlining the multiple methods to submit comments, and blank comment cards for individuals to fill out and submit at the public hearing without making verbal comments. The 45-day public comment period remained open until August 9, 2024, one month after the Open House and Public Hearing to provide sufficient time for individuals to offer comments on the Project and the environmental documentation after having an opportunity to attend the Open House and Public Hearing and receive the materials and presentation.<br><br>In addition, the interpretation assistance in Spanish Chinese, and Japanese was provided at the formal Public Hearing. The Link US Project Team adheres to all applicable policies for community engagement and to ensure that all project materials are accessible to all. Metro requests accurate contact information be provided by commentors to facilitate a prompt response; however, providing personal contact information is not required to submit comments. Metro responds to all comments received, regardless of if legal name and other contact information is provided (see Final EIS Volume III). |

**Comment Number:** IND 41

**Name:** Frank Zells

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

So the climate agenda is destroying the Los Angeles and the United States industry like, tourism, like, they want to shut down the airport in Long Beach. There's no houses around it. Like it's affecting people somehow. It's too extreme. Yeah, and I think my assumption is that they're trying to destroy car's -- the car industry. They want everything to be green. IND 41-1

They want everything to fly in a spaceship to take the Metro, like you're never going to destroy the car industry in Los Angeles. You're just going to cause more congestion. IND 41-2

Also, safety. There's drug use on Metro.· There's homeless asleep. There was a murder inside the Metro. There was an assault inside the Metro, on the Metro that I was on, both times, like, concurrently. IND 41-3

So, like, also, like, the existing Metro yard, why don't you just upgrade those? I Googled the extension from East LA to Downtown and caught the -- or there was one there but I Googled randomly and it's 230 million for an extension, maybe the person there he can do it forbearance with the city department of building. All they want is money, and you can get an exception on the codes. IND 41-4

Also, from Pico to, like, Culver City, the Metro is packed. The demographic is impoverished immigrants and 20 percent of them are illegal. IND 41-5

A lot of hipsters I know -- they do not want to go on Metro because it's over capacity. IND 41-6

And I don't see too many people from East LA extension to Downtown. LA is diverse but it is not inclusive, because I am not included because of my MAGA hat. IND 41-7

And what I see is the rich are providing for their impoverished people with California tax dollars. I encourage, also, people to learn simple English out of high school. IND 41-8

## IND 41 Frank Zells

**IND 41-1** The Final EIS includes a full evaluation of environmental impacts, including climate change, and includes measures to mitigate these effects. The Build Alternative and Build Alternative Design Option supports sustainable transportation solutions, reduces congestion, and improves air quality in the long term, which are all components of broader efforts to address climate change. Please refer to Final EIS Section 3.5, Pages 3.5-23 through 3.5-39 and Final EIS Section 9.13.2.

**IND 41-2** Traffic-related effects are evaluated in the Draft EIS/SEIR Section 3.3 for the Build Alternative and Final EIS Section 9.13.1 and Table 9-12 for the Build Alternative Design Option.

As discussed in Key Issue Response #2, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue – operations, and Fruitland Avenue – operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, the Malabar Yard railroad improvements would not contribute to traffic

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| | | congestion that would be deemed as dangerous.<br><br>During operations, the Build Alternative or the Build Alternative Design Option would increase traffic delay at one intersection that would exceed the 2.5-second delay significance criterion, resulting in an adverse effect. However, with implementation of Mitigation Measure LU-1, new active transportation improvements would enhance non-motorized connectivity and reduce the demand for single-occupant vehicle trips, thereby minimizing the operational traffic delay impacts. |
| | **IND 41-3** | In the Final EIS Section 3.14, Safety and Security, Pages 3.14-31 – 3.14-32, it is noted that both human-caused and natural threats, like the examples the commenter references, present a security risk and were considered as part of the evaluation. Threats and hazards that could occur within the concourse and on the platforms could include the following: active shooter; robbery, and other person-on-person crimes; theft and other property-related crimes; improvised explosive device (IED); and chemical/biological threats. It is important to note that these risks exist today and would continue throughout operations. However, Metro's existing safety and security plan addresses these potential threats and would be updated in response to the final design parameters. In addition, based on the *Link US Threat and Vulnerability Assessment*, provisions were established for the deterrence and detection of, and protocols for the response to, criminal or terrorist acts |

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| | | involving facilities and operations. Based on the assessment performed, specific measures are being incorporated into the design, such as fencing, intrusion detection, security lighting, and security procedures and training. Additional security measures under consideration include baggage screening, explosive detection systems at facility entrances, video surveillance cameras, physical barriers (i.e., perimeter fencing, perimeter walls, or building walls), and the design of HVAC systems to prevent or limit the spread of chemical or biological threats. |
| | **IND 41-4** | In the Draft EIS/SEIR Chapter 2.0, the alternatives analysis process was described and summarizes the criteria and results of screening 14 track alignment alternatives and 6 concourse concepts (also provided in the Draft EIS/SEIR Appendix B, *Link US NEPA Alternatives Evaluation Memorandum and Engineering Plans*). Based on the criteria, any track alignment alternative or passenger concourse concept that did not meet all screening criteria was rejected from further consideration. The track alignment and concourse concept that meets all screening criteria and was recommended for detailed evaluation in the Draft EIS/SEIR as the Build Alternative is shown in Draft EIS/SEIR, Section 2.0 Alternatives and Design Options Considered, Table 2-3. The Final EIS includes a reconsideration of the Build Alternative Design Option and other alternatives with 8 run-through tracks. |

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| | **IND 41-5** The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIS/SEIR.<br><br>**IND 41-6** As stated in the Draft EIS/SEIR Chapter 1.0, Page 1-11, the purpose of the Project is to increase the regional and intercity rail service capacity of LAUS to meet existing demand and projected future growth.<br><br>Currently, existing facilities at LAUS do not have adequate operational and passenger capacity to serve future rail transportation needs. Therefore, the Project is needed to improve and increase pedestrian access to train platforms; enhance passenger safety, flow, and capacity; and increase accessibility for passengers with new facilities that meet current building code and Americans with Disabilities (ADA) requirements.<br><br>**IND 41-7** The commenters observations are noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIS/SEIR.<br><br>**IND 41-8** The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIS/SEIR. |

**Comment Number:** IND 42

**Name:** John Rhee

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

Again, regarding to our relation with Malabar Yard Extension, essentially for those who are not aware, this specific part of this broader Link Union Project. LA Metro wants to take the 5,000 feet of yard that belongs BNSF, a privately-owned company. In exchange, essentially LA Metro wants to give the City of Vernon to BNSF. Carve it up in multiple ways. IND 42-1

You've heard about all the impacts that we feel that haven't been properly accounted for in your EIR. IND 42-2

In our private conversation you said, recommend a solution. The Los Angeles Junction and the reason why I bring this up is because if you look at it from a map, it's a logical choice for replacing lost track for BNSF. It is the most efficient route and the land doesn't exist now because there's about three buildings that you probably have to acquire. But in this situation, you're taking up your BNSF. And what they're asking for is the (unintelligible). Los Angeles – LA Public Metro is acquiescing to that ask. And, again, you have a lot of anger here because that exchange, that's not just for property owner, as a taxpayer, it's disproportionate. And anybody that actually looks into it would be appalled because this is disproportionate in exchange. IND 42-3

And in simple terms, you're giving way the livelihood, the potential disruption to 40,000 jobs in the City of Vernon, massive losses in property value because City of Vernon really exists for commerce. And in exchange for that, you're getting 5,000 feet of track from BNSF. And what they asked for was gold, and I'd imagine if this plays out you guys probably think the other options are better. But it's BNSF. They're a Warren, you know, Buffet Berkshire Hathaway company and sometimes you have to give. You're giving too much here. I really implore the LA Metro to explore the LA Junction alternative. Thank you. IND 42-4

## IND 42 John Rhee

**IND 42-1** Metro is not proposing to give the entirety of the City of Vernon to BNSF. A loss of 5,500 feet of storage track capacity at the BNSF West Bank Yard would occur during construction and remain throughout operations. To offset loss of storage track capacity, the 46th Street Connector and 49th Street Closure are proposed as mitigation to maintain freight railroad operations. The purpose for implementing Malabar Yard railroad improvements is to comply with NEPA and CEQA's requirement to mitigate the Project's adverse effects resulting from permanent loss of approximately 5,500 feet of freight storage track capacity (40 CFR 1502.14(f), 40 CFR 1502.16(h); CEQA Guidelines §15126.4(a)). A project's impact on freight is an environmental topic required for consideration in an EIS using FRAs Environmental Procedures.

**IND 42-2** Metro has considered the comments received. A full environmental evaluation of the Malabar Yard railroad improvements is provided as Draft EIS/SEIR Appendix Q. The Draft EIS/SEIR discloses a conservative level of potential impacts that may occur with implementation of the Malabar Yard railroad improvements and identifies mitigation measures that would be implemented in the City of Vernon to reduce impacts where feasible.

Following the December 18, 2024, meeting conducted with the property owner, Metro relayed that the existing crossing on Seville

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| | | Avenue just south of 46th Street can remain as existing and require no revisions to existing passive warning devices. Therefore, the medians and gate arms initially proposed on the north and south sides of the existing crossing adjacent to 4620 Seville Avenue are no longer required nor proposed as part of the 46th Street Connector Design Option 1 or 2. |
| | **IND 42-3** | Metro appreciates the suggestions to consider an alternative site to accommodate storage tracks at Los Angeles Junction. Please refer to the Comment IND 37-4 response for discussion on why the BNSF Los Angeles Junction was not a feasible location to offset the permanent impacts on freight railroad operations. As discussed in that response, the Los Angeles Junction location was not considered feasible because it does not meet the secondary screening criterion as stated in Draft EIS/SEIR Appendix Q, Section 1.1 Page 1-13. The Los Angeles Junction does not have enough available land area to accommodate additional storage track capacity for empty bare tables in its current configuration because all space available at Los Angeles Junction is occupied by existing merchant trains that currently operate from this location to serve local customers. As shown in the Final EIS Appendix Q, Section 1.1.1, Figure 1-3, and discussed on Page 1-14, expansion of the Los Angeles Junction to accommodate additional storage tracks would require full parcel acquisition of seven private properties with active businesses/buildings. This magnitude of impacts on businesses in Vernon would be |

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| | | greater than the impacts associated with the design options considered for the Malabar Yard railroad improvements at 49th Street and 46th Street.<br><br>The comments provided on the Draft EIS/SEIR with regards to the impacts on businesses in the City of Vernon have been taken into consideration. Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements during construction and operation and develop solutions that preserve the city's economic vitality and connectivity to the extent feasible. |
| | **IND 42-4** | The commenter may be referring to the total number of employees in the City of Vernon; however, the commenter does not provide official data to support that figure or to explain why all 40,000 jobs could be disrupted. The Draft EIS/SEIR does not conclude that 40,000 jobs would be disrupted upon implementation of the Malabar Yard railroad improvements.<br><br>An in-depth analysis of economic and fiscal effects of the Link US Project including Malabar Yard railroad improvements in the City of Vernon can be found in the Draft EIS/SEIR Appendix O, *Link US Economic and Fiscal Impact Assessment* (Build Alternative), Final EIS Chapter 9 Section 9.13.4 (Build Alternative Design Option) and Draft EIS/SEIR Appendix Q Section 3.13 (Malabar Yard Railroad Improvements). A balanced analysis was performed to |

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| | determine the conclusions presented in the Draft EIS/SEIR based on the local and regional impacts from short term construction spending, as well as long term impacts related to potential job displacement and lost property tax revenues due to the required ROW acquisitions and associated building demolition (if required).<br><br>Please refer to the Comment IND 42-3 response for discussion on why the BNSF Los Angeles Junction was not a feasible location to offset the permanent impacts on freight railroad operations. |

**Comment Number:** IND 43

**Name:** Mario Dominguez Jr.

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

Yeah, I just wanted to say: It's Mario Dominguez, Junior, again, from South Gate. I am listening to the other speakers, and I am just dumb struck, so are we done as a city? As a county? We're just not going to build new infrastructure projects? We're just done as a city? This is it? It's set in stone? The City of Los Angeles is going to remain as is -- we're not going to develop new things that are going to make travel in and out of LA easier, more pleasant for the residents inside and outside the City of Los Angeles? I mean, this is absurd. I mean, we -- we -- we need great infrastructure. We need to have this -- this location is supposed to be a hub. It's supposed to be a travel hub to get people to move – people in and out of LA for crying out loud. So I encourage Metro to proceed with this project. I feel sorry for Vernon. What can you do? It's a casualty, what can I say? But please take on the project and move forward with this. Thank you. That's all I have. IND 43-1

## IND 43 Mario Dominguez Jr.

**IND 43-1** The commenter's expressed support for the Project is acknowledged.

**Comment Number:** IND 44

**Name:** Patricia Roach Finkel

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

I have a comment. It's going to cost one billion dollars to do this project, like, is this investment worth the returns in the Metro fare in the long run? Like that is just the question for you to estimate. Thank you. IND 44-1

## IND 44 Patricia Roach Finkel

**IND 44-1** The Project is an investment based on the regional need generated by the forecasted increase in regional population and employment. As stated in the Draft EIS/SEIR Chapter 1, Page 1-11, "Localized operational, safety, and accessibility upgrades in and around LAUS will be required to meet existing demand and future growth." The Metro Board of Directors and the CHSRA Board of Directors will consider the cost-benefit analysis when deciding between the No Action Alternative and the Build Alternative and Build Alternative Design Option.

**Comment Number:** IND 45

**Name:** Patricia Roach Finkel

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

This is Patricia Roach Finkel again. I have a question. Why we were never notified until May? Can you answer that for us? IND 45-1

## IND 45 Patricia Roach Finkel

**IND 45-1** Metro staff provided a response to the commenter during the Public Hearing. It was stated that a mass mailer was distributed throughout the project study area to property owners within a mile radius. In addition, legal advertisements were posted, social media platform advertisements were posted via Facebook and Nextdoor, and mass emails were distributed to those on the email list from prior public outreach meetings.

In September 2020, Metro met with the property owner that the commentor represents to discuss the Link US Project, Malabar Yard railroad improvements, and potential effects to gather feedback for consideration in the environmental evaluation. Between December 2024 and February 2025, multiple attempts were made by Metro to meet with the commentor to discuss the Malabar Yard railroad improvements and comments raised during the 45-day public comment period. In February 2025, Metro did meet with the property owner's representative during a meeting with a nearby property owner.

Please refer to Key Issue Response #1 for a discussion of stakeholder engagement activities conducted in the City of Vernon to support the environmental review process for the Malabar Yard railroad improvements. As summarized in Key Issue Response #1, Metro implemented a wide range of formal and informal outreach methods such as in-person and virtual public meetings,

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| | business and property owner briefings, coordination meetings with Vernon City staff, public presentations to the Vernon City Council, Vernon Business and Industry Commission, and Vernon Chamber of Commerce, distribution of legal advertisements, email blasts, door to door visits to potentially affected properties, phone calls to the businesses using publicly available information, Link US Project pamphlet distribution, and social media engagement. These outreach activities demonstrate that Metro and CHSRA met and exceeded legal requirements regarding responsibilities to engage and meaningfully involve all affected communities in the public decision-making process.<br><br>In 2020 and again in 2024, Metro made physical visits to all potentially affected parcels and properties adjacent to the proposed Malabar Yard railroad improvements to engage with property owners and tenants and obtain contact information to share project details.<br><br>A summary of the notices, announcements, and mailings that were distributed to properties in Vernon is below:<br><br>• On September 22, 2020, Metro hand-delivered to owners of potentially affected properties notifications of the October 8, 2020, Virtual Public Scoping Meeting.<br><br>• On September 22, October 6, and October 8, 2020, Metro distributed flyers and e-blasts to notify individuals, organizations, and agencies on the |

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| | stakeholder distribution list including property owners and tenants of potentially affected parcels, the Vernon Chamber of Commerce, the Vernon Business and Industry Commission, and City representatives of the Revised NOI and October 8, 2020, Virtual Public Scoping Meeting.<br>• On September 29, 2020, Metro used the County of Los Angeles assessor parcel information to notify all owners of properties traversed by the Project footprint that Metro had released a Revised NOI and that Metro was holding a Virtual Public Scoping Meeting on October 8, 2020.<br>• Legal advertisements for the Revised NOI and Virtual Public Scoping Meeting were issued in five newspapers in 2020.<br>• On October 25, 2020, Metro distributed a tri-fold pamphlet to all property owners in the jurisdictional limits of Vernon and in the far northern portion of Huntington Park.<br>• On June 26, 2024, hand-delivered notifications were distributed to owners of all potentially affected properties to notify them of the Draft EIS/SEIR public comment period and Open House/Public Hearing.<br>• Link US Project tri-fold mailers (approximately 5,000) were distributed to owners of properties within 1-mile radius of the Malabar Yard railroad improvements prior to the Draft |

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| | EIS/SEIR public review period and Open House/Public Hearing<br>• Legal advertisements for the release of the Draft EIS/SEIR and Open House/Public Hearing were issued in four newspapers in 2024. |

**Comment Number:** IND 46

**Name:** Mario Dominguez Jr.

**Date Received:** 07/09/24

**Format Received:** Oral Comment at Public Hearing

Yeah, I just -- It's Mario Dominguez, Junior, here again from South Gate. Yeah, I have to concur with the other speakers about alerting folks and making us aware about this project. I had no knowledge of this project until I got the e-mail notification for this Zoom meeting and the e-mail was stacked, because it was, like, the newsletter that Metro sends out. So it was stacked with several projects and so this was one of several. So one of bunch. So that and it just caught my eyes as I read the paragraph of what -- it details what it was and, oh, yeah, they're doing this? This sounds great. So that's how I became aware. But prior to tonight I had no knowledge that Metro was undertaking this project and doing it. So you guys need to really step up your game when it comes to alerting the other folks and make us aware. Okay. That's all I have. Thank you.

IND 46-1

## IND 46 Mario Dominguez Jr.

**IND 46-1** Metro appreciates the comments provided regarding the outreach conducted and the commentor's attendance at the Public Hearing. Unfortunately, the commenter did not provide any specific suggestions to which Metro could respond. A robust public involvement and outreach program has been and continues to be implemented as part of the Project to inform the public of key milestones (see Draft EIS/SEIR Chapter 8, Public and Agency Outreach).

**Comment Number:** IND 47

**Name:** Guthre Leonard

**Date Received:** 07/25/24

**Format Received:** Email

Hello,

I am a regular user of Union Station due to the Pacific Surfliner. I commend the great detail that the draft EIR has. I appreciate especially the specific acknowledgements to increased noise and impacts to people walking and biking. Let this project continue. It is necessary for the entire state, and can make rail a more competitive option for millions of citizens. People will take the train if it is allowed to be a realized option. Do not let a loud minority get in the way of a quiet majority; upgrade Union Station! IND 47-1

Thank you,

Guthre Leonard

## IND 47 Guthre Leonard

**IND 47-1** The commenter's support for the Project is noted. It should be noted that Mitigation Measures NV-1 through NV-3 would avoid or minimize potential adverse effects relative to noise during construction and operation of the Project. Additionally, it should be noted that Mitigation Measure TR-2 would be implemented to minimize impacts on pedestrians at Los Angeles Union Station. Mitigation Measures NV-1 through NV-3 and Mitigation Measure TR-2 are applicable to the Build Alternative and the Build Alternative Design Option.

**Comment Number:** IND 48

**Name:** Paul A. Brown

**Date Received:** 07/26/24

**Format Received:** Online Comment Form

I support this project. I anticipate being a customer of High Speed rail when it finally arrives to LAUS. Even before then, construction of through tracks to the south of LAUS is critical for passenger convenience and better, faster train service on High Speed rail in future and Amtrak and MetroLink now.

Accommodating improvements to LAUS concourse and platforms will also provide better passenger amenities. All this construction is well worth any temporary inconvenience.

IND 48-1

I am disappointed that the new through tracks are two tracks, not four. Future proofing requires that we build Now for the future. Constructing additional through tracks at some unknown future date will cost much more then than if it were done now.

IND 48-2

## IND 48 Paul A. Brown

**IND 48-1** The commenter's support for the Project is noted.

**IND 48-2** As discussed in the Draft EIS/SEIR Chapter 2 and Final EIS Chapter 9, the Build Alternative evaluated in the Draft EIS/SEIR and Build Alternative Design Option evaluated in the Final EIS would both include two run-through tracks south of LAUS as part of the interim condition. The proposed full build-out condition includes the accommodation for two additional regional/intercity rail run-through tracks south of LAUS, equating to 4 total regional/intercity rail run-through tracks. The Build Alternative and Build Alternative Design Option also accommodates the planned HSR system. Phasing is a typical component of infrastructure projects, and the Project is being environmentally-cleared and implemented based on available funding.

**Comment Number:** IND 49

**Name:** Miguel Roldan

**Date Received:** 07/27/24

**Format Received:** Email

I am a Buena Park resident supporting the OCTA potential plans for a light-rail streetcar to be ran from Artesia to connect to the Santa Ana downtown streetcar l. With Disneylands planned expansion and the Olympics coming to the greater Los Angeles metropolitan area, this light rail train would be great for tourism and profit. This relates to Union Station as I happen to work near DTLA. I have hopes that this streetcar will enhance my daily-life tenfold. IND 49-1

## IND 49 Miguel Roldan

**IND 49-1** The commenter's support for the Project and for the referenced light rail is noted.

**Comment Number:** IND 50

**Name:** Kerry

**Date Received:** 07/31/24

**Format Received:** Online Comment Form

As a UCLA student, this project will positively impact me. With the advancement of Metrolink's SCORE, this is an exciting development that I believe has the best potential to make rail more viable and competitive across Southern California! It further will wonderfully connect to the Metro and muni bus lines which are the hallmark of this great region.

If there is anyway to expedite the project delivery, I would be very supportive of that! Also potentially redeveloping the area around Gateway that is more supportive of high density housing would be good.

IND 50-1

## IND 50 Kerry

**IND 50-1** The commenter's support for the Project is noted. Metro is expediting this project as quickly as possible toward a decision and implementation of the Build Alternative or Build Alternative Design Option. High-density housing is not a required element to fulfill the purpose and need of the Project.

**Comment Number:** IND 51

**Name:** Bryan Theis

**Date Received:** 07/31/24

**Format Received:** Online Comment Form

This project will bring benefits to train passengers throughout Southern California. Please hurry up and get this done! IND 51-1

## IND 51 Bryan Theis

**IND 51-1** The commenter's support for the Project is noted. A summary of Project-related benefits can be found in the Final EIS Executive Summary.

**Comment Number:** IND 52

**Name:** Keith Jefferies

**Date Received:** 07/31/24

**Format Received:** Email

The improvements proposed for Union Station make total sense. It is understandable there will be some short term issues from construction, but this is more than worth it to make the station a stop on through-routes instead of having trains pull in, then pull out, which slows everything down. Increasing service capacity in this way is an excellent strategy as Los Angeles looks ahead to the future. IND 52-1

Thank you!

## IND 52 Keith Jefferies

**IND 52-1** The commenter's support for the Project is noted.

**Comment Number:** IND 53

**Name:** Paul Wennberg

**Date Received:** 07/31/24

**Format Received:** Email

Design of Link US should be consistent with future electrification via overhead catenary of Metrolink / Regional Intercity Rail. IND 53-1

## IND 53 Paul Wennberg

**IND 53-1** The commenter's preference for future electrification is noted. The Build Alternative and Build Alternative Design Option does not preclude future overhead catenaries to support electrified trains through the Project limits because operators are currently using diesel trains. It should be noted that Metrolink, Amtrak, and CHSRA, as the rail operators through LAUS, would be responsible for the purchase and operation of electrified trains that move through Project limits.

**Comment Number:** IND 54

**Name:** Rebecca Samonte

**Date Received:** 08/02/24

**Format Received:** Email

Hi,

What is the schedule for this project? What is the anticipated advertise time frame? IND 54-1

Thank you,

Rebecca Samonte

KIEWIT INFRASTRUCTURE WEST CO.

[redacted]

[redacted]

## IND 54 Rebecca Samonte

**IND 54-1** The Project's anticipated environmental review timeline is as follows:

- Summer 2025 - SEIR Certification and Record of Decision
- Fall 2025 – Metro engages contractor
- Spring/Summer 2026 – Construction of infrastructure as part of Interim Condition begins
- 2031 – Construction of infrastructure as part of Interim Condition complete

Advertisements for contract opportunities with Metro will be made available in 2025.

**Comment Number:** IND 55

**Name:** Anita Diaz

**Date Received:** 08/02/24

**Format Received:** Email

Hello,

Glad to read about planned improvements at Union Station. We appreciate the sketched upgrades to such a historical place. Namely, the Brightline bullet train from Las Vegas. It is currently slated to reach Rancho Cucamonga which, it may be possible, eventually arrive at Union Station. Further, the Coachella Valley-San Gorgonio Pass Rail Corridor Service Project, a proposed daily intercity passenger rail service between the Coachella Valley and Los Angeles Union Station. And, if there are additional Metrolink trains added to its current schedule. It is hopeful there will be enough rail track and accommodations to receive these future rail trains. IND 55-1

With the mostly heavy highway vehicle traffic congestion between downtown Los Angeles and Los Angeles International Airport, one hopes to see in the future, please consider, the addition of a connector rail track between Union Station and LAX airport. And possibly, including a connection to and from Union Station and Hollywood Burbank Airport on an upcoming drawing board. It would greatly help passengers with easier, direct access to the flight terminals without the hassle of traffic during peak hours and especially during holidays. Union Station is the hub of rail in Los Angeles, with these new planned improvements, Union Station Los Angeles will prominently stand out as a major artery of transportation in Southern California, perhaps even the west coast. IND 55-2

Thank you for your attention.

Respectfully,

Anita Diaz

## IND 55 Anita Diaz

**IND 55-1** The commenter's support for the Project is noted. As discussed in the Draft EIS/SEIR, Chapter 2 Section 2.5, the Build Alternative evaluated in the Draft EIS/SEIR would facilitate a substantial increase in Metrolink and Amtrak/LOSSAN service and new HSR service through LAUS, thereby contributing toward achieving the vision of multiple statewide and regional planning documents, including the *California Transportation Plan 2050* (Caltrans 2021), 2020 RTP/SCS: Connect SoCal (SCAG 2020), and the 2018 *California State Rail Plan: Connecting California* (Caltrans 2018a), that provide for increased operational frequency for regional and intercity trains and introduction of the planned HSR system in Southern California by 2040. The increased train movements as part of the Coachella Valley-San Gorgonio Pass Rail Corridor Service Project are accounted for in the projected total daily train movements for Amtrak/LOSSAN. (see Draft EIS/SEIR Chapter, Table 1-1). This is true for the Build Alternative Design Option as well as discussed in Final EIS Chapter 9, Section 9.9 and Table 9-12.

The Draft EIS/SEIR Chapter 3.16, Table 3.16-2 includes projects considered as part of the cumulative effects analysis as well as the methodology for which projects were considered as part of the cumulative effects analysis in this EIS/SEIR. The cumulative effects analysis defines cumulative projects as those likely to occur within the 2040 horizon year and considers planned

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| | | development within the cities of Los Angeles and Vernon. Specifically, the cumulative analysis considers reasonably foreseeable development, transportation and transit projects located within 0.85 miles of the Build Alternative and Malabar Yard railroad improvements. The accommodation of Brightline West, which would operate from Rancho Cucamonga to Las Vegas, is not part of the Project design (or considered as a cumulative project) because it was not considered a reasonably foreseeable project that was raised during the scoping process or during preparation of the Draft EIS/SEIR. The components of the Brightline West Project do not align with the Project's purpose and need to increase regional/intercity rail service capacity at LAUS. |
| | **IND 55-2** | We appreciate the input about future proposed alternatives ideas. The Build Alternative or Build Alternative Design Option does not include any connection from LAUS to LAX or Hollywood Burbank Airport; however, would provide additional capacity at LAUS to accommodate more trains and facilitate more transfers to LAUS FlyAway Service providing direct bus connection to LAX from Patsaouras Plaza. In addition, the Build Alternative and Build Alternative Design Option would accommodate the planned HSR system through the Project limits, which does provide a connection to Hollywood Burbank Airport. Progress on the K Line and the LAX people mover would allow people to make a rail connection to LAX. |

**Comment Number:** IND 56

**Name:** Bernard Niesen

**Date Received:** 08/02/24

**Format Received:** Email

To whom it may concern:

I would love to see ridership links from Union Station to LAX. It would be preferable to have quick and easy links to transition to LAX. IND 56-1

Sincerely,

Bernard Niesen

## IND 56 Bernard Niesen

**IND 56-1** Please refer to the Comment IND 55-2 response for a discussion regarding a connection from LAUS to LAX. As discussed in the response, the Build Alternative and Build Alternative Design Option would provide additional capacity at LAUS to accommodate more trains and facilitate more transfers to LAUS FlyAway Service providing direct bus connection to LAX from Patsaouras Plaza.

**Comment Number:** IND 57

**Name:** Jerard D Wright

**Date Received:** 08/02/24

**Format Received:** Online Comment Form

I support the project, but consideration should be made for Link US and the Southeast Gateway Corridors to collaborate together to leverage more Federal New Starts resource to provide critical access infrastructure for our expanding and modernizing rail system. IND 57-1

There should be room for an additional 2 Light Rail tracks to allow trains to access from 6th Street/Arts District into a station platform (Tracks 3 and 4) at Union Station adjacent to the A Line Platform (Tracks 1 and 2). IND 57-2

Instead of spending billions of dollars on a tunnel alignment underneath Alameda Street and tearing up Union Station with that project and the raising of the track bed for a future Phase B, it would be far more cost effective to blend both projects together to serve the emerging Arts District and Union Station into one regionally and nationally significant piece of rail infrastructure that will rethink how Union Station operates for all Metro, Metrolink, Amtrak and CAHSR trains. IND 57-3

## IND 57 Jerard D Wright

**IND 57-1** The commenter's support for the Project is noted. Funding priorities for transit projects are determined through a structured government planning process for allocating funds for set transportation goals. Information regarding prioritization of transit funding is not available and is outside the scope of the Draft EIS/SEIR.

**IND 57-2** The commenter's suggestion to construct two additional light rail tracks adjacent to the A line Platform is noted and appreciated. As discussed in the Draft EIS/SEIR Chapter 2, Section 2.1, the proposed track alignment considered as part of the Build Alternative evaluated in the Draft EIS/SEIR was selected amongst 14 alternatives considered, based on its ability to meet a series of screening criteria. The commenter's suggested concept would not meet the screening criteria because it would require an additional platform to be added for regional/intercity rail trains or HSR to meet the forecasted train movements through LAUS. As discussed in the Draft EIS/SEIR Chapter 2, CHSRA and Metro fully considered a reasonable range of alternatives to meet the purpose and need of the Project. Track alignment alternatives that require an eighth platform were rejected from further consideration due to right of way (ROW) impacts and the multiple years of transit service disruptions during construction that would affect a high volume of passengers.

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| | **IND 57-3** The commenter's suggestion to expand the Project is noted. A new tunnel under Alameda Street is not proposed or required as part of the Project to increase capacity at LAUS in accordance with the provisions of the purpose and need and therefore is not a reasonable alternative for consideration. The concepts described in the comment lacks detail for sufficient consideration in the Final EIS. |

**Comment Number:** IND 58

**Name:** David Welch

**Date Received:** 08/02/24

**Format Received:** Email

Hi,

I've lived in various parts of LA over the past 20 years and currently live in North Hollywood.

I just wanted to write to voice my support for the Link Union Station Project — I believe the upgrades are badly needed and will help move LA (and Southern California generally) toward more effective rail transit. IND 58-1

My only real requests are to try to maintain the iconic architectural character of Union Station, IND 58-2

to actively design an environment that will be safe, walkable, and bikeable — IND 58-3

and to try to design the facilities with features that support human comfort such as shade, plants/trees, water features, noise reduction, and natural materials (e.g. wood, clay tiles, etc.). IND 58-4

Thank you for your consideration.

David Welch

Resident, North Hollywood

[redacted]

[redacted]

## IND 58 David Welch

**IND 58-1** The commenter's support for the Project is noted.

**IND 58-2** The commenter's concern for preservation of historical elements of LAUS is noted. The Build Alternative Design Option was developed based on new information from public comments received during the 45-day public comment period related to historic preservation, comments from the SHPO and consulting parties as part of the Section 106 process related to historic preservation of LAUS, and new information from the engineering design process that provide opportunities to reduce the size of proposed infrastructure, avoid and reduce the magnitude and intensity of environmental effects as compared to the Build Alternative, and reduce cost in a manner that would still allow Metro to meet all provisions of the purpose and need.

Please refer to the Comment IND 3-1 response for description of the measures that are required to be implemented to maintain the architectural character of LAUS. As discussed in that response, the Build Alternative Design Option is intended to avoid, reduce, or minimize impacts to key character-defining features of LAUS. No modifications are proposed to architecturally significant buildings and spaces that comprise the west side of LAUS, including the passenger waiting area, former ticketing room, Harvey House restaurant, and courtyards. Unfortunately, without some

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| | | modifications to LAUS, physical constraints prevent the Build Alternative or Build Alternative Design Option from being implemented. Therefore, Mitigation Measure CUL-2 requires preparation and implementation of a Built Environment Treatment Plan (BETP) that details the specific actions Metro would take to resolve adverse effects on built environment historic properties, including the portion of LAUS that would be affected. |
| | **IND 58-3** | The Build Alternative and Build Alternative Design Option would promote safe bicycle and pedestrian access to and from LAUS and connection points around LAUS. It will enhance neighborhood connectivity consistent with the Los Angeles River Revitalization Master Plan, River Improvement Overlay (RIO) District guidelines, LAUS Sustainable Neighborhood Assessment, City of Los Angeles Mobility Plan, Metro's LA River Path Project, and Metro's Los Angeles Union Station Forecourt and Esplanade Improvements Project. Mitigation Measure LU-1 includes provisions for Metro, in coordination with the City of Los Angeles, to implement either Class II or IV type bike lanes south of LAUS along Commercial Street from Alameda Street to Center Street. These bike lanes would be constructed in accordance with applicable recommendations from the River Design Guidebook for safe access between the east side of LAUS to the Los Angeles River. If additional funding is identified, a dedicated bicycle/pedestrian bridge over US-101 could be constructed in addition to the new bicycle lanes described above. As depicted in Draft |

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| | | EIS/SEIR Section 2, Figure 2-26, at the intersection of Center Street and Commercial Street, new sidewalks, bike lanes, and pedestrian safety/ADA features would be implemented as part of the Build Alternative evaluated in the Draft EIS/SEIR. At Vignes Street and Cesar Chavez Avenue, the horizontal clearance of the two bridges proposed for replacement accommodates and does not preclude future roadway improvements in accordance with the city's *Mobility Plan 2035.* At North Main Street, Metro will continue to coordinate with the City of Los Angeles as the design process advances to maximize safety at the North Main Street railroad crossing while not precluding future active transportation improvements that the City of Los Angeles may elect to implement. Mitigation Measure LU-a1 is applicable to the Build Alternative and the Build Alternative Design Option. |
| | **IND 58-4** | The Build Alternative Design Option would include individual canopies above each elevated platform to provide shade and weather protection. The commenter's preferences related to human comfort design features are noted. |

**Comment Number:** IND 59

**Name:** Sara Fenton

**Date Received:** 08/03/24

**Format Received:** Email

To Whom it may concern,

I am an athlete and member of the LA Derby Dolls that has a location on 46th St where the proposed 46th St Connector is located.

I am concerned about noise disruption and safety of our athletes going to and from practice around a train track. I am also concerned about the disruption to our regularly scheduled activities at 2661 E 46th street during the construction period. IND 59-1

Sara Fenton

[redacted]

[redacted]

## IND 59 Sara Fenton

**IND 59-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10). The Derby Dolls business is located in close proximity to two existing tracks that are already active with freight railroad operations. The 46th Street Connector would connect these two existing active tracks. As noted in the Comment ORG 7-4 response, the Derby Dolls business is not considered noise or vibration sensitive per FTA/FRA manuals. Therefore, Metro does not expect any noise or vibration from construction or operation would disrupt the activities there. Nonetheless, no disruptions to regularly-scheduled activities occurring at the subject parcel are anticipated because no impacts to the subject parcel would occur.

**Comment Number:** IND 60

**Name:** Michael Melideo

**Date Received:** 08/04/24

**Format Received:** Email

Hello Mr. Maldonado,

Thank you for reaching out.

The project Metrolink plans in the City of Vernon will not only will be devastating to the workers that commute to Vernon every day , It will also destroy my business. IND 60-1

The impact to the community at large will generate huge traffic back ups, creating unsafe driving conditions and increased pollution due to idling trucks. IND 60-2

Furthermore, cutting off certain access routes will negatively effect first responders, creating health and safety concerns. IND 60-3

The impact to my business, after being in the city of Vernon for 44 years, will be equally as disastrous. The nature of my business is buying huge steel coils that require 45 foot tractor-trailer trucks. The nature of my buying, in order to buy competitively, is purchasing large quantities at a time. Coincidentally, during the last open session at the metro downtown office, I was receiving 200 truckloads of steel from the docks of L.A. port. In order to avoid penalties from the port authority and demurrage charges, we must receive approximately 25- 30 truckloads per day, added to our current every day business leads us to have to load and unload sometimes 40 truckloads in a single day. Closing 49th St. will put an end to my business and 85 people will lose their jobs. To try to continue that activity with 49th St. closed, Santa Fe Ave would be backed up for miles with idling trucks and traffic at a standstill. IND 60-4

At 68 years old my plan was to sell Consolidated Fabricators Corp. as a going concern so my 85 employees would continue to have a job. This project will make that transition impossible. You will put 85 people out of work.

Not being able to sell my business along with the severance, I would want to give to so many of the employees, who have been loyal to us for many of them over 30 years, will be a total loss of approximately $58 million. Add to that the negative aspect of the real estate value as a -total damages - calculation.

## IND 60 Michael Melideo

**IND 60-1** In 2020 and 2021, Metro staff collaborated with the commentor/property owner to develop the hammerhead configuration (49th Street Closure Design Option 2) as a means to allow for safe and legal access into and out of the Consolidated Fabricators business with optimal maneuverability for large semi-trucks. During the February 3, 2025 meeting conducted onsite with the commentor/property owner, Metro provided exhibits to demonstrate closure and relocation of the Consolidated Fabricators business is not proposed, nor deemed required, as part of the Malabar Yard railroad improvements because the 49th Street Closure would be designed in a manner to allow business access to be maintained. On February 20, 2025, Metro provided two additional preliminary concepts that were developed for review/consideration based on discussions held onsite with the commentor/property owner and their staff. Metro believes the alternative configurations for truck movements on the property would facilitate ongoing business operations.

The 49th Street Closure Design Option 2 is the preferred design option for the 49th Street Closure because it facilitates optimal maneuverability in and out of the Consolidated Fabricators business and other local businesses.

**IND 60-2** Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized

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| | impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. As discussed in Key Issue Response #2, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue – operations, and Fruitland Avenue – operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. Therefore, the Malabar Yard railroad improvements are not expected to cause huge traffic backups that would create unsafe driving conditions.<br><br>In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day). Fewer train movements on the Harbor Subdivision would improve citywide circulation and increase opportunities for enhanced community connectivity.<br><br>Please refer to Key Issue Response #3 for a discussion related to sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad |

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| | | improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4. |
| | **IND 60-3** | Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that |

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| | | could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |
| | **IND 60-4** | Metro appreciates the input received and the detailed background provided regarding Consolidated Fabricators' longstanding operations at the corner of 49th Street and Santa Fe Avenue in the City of Vernon. Metro recognizes this facility's valuable contributions to the community over the past 45 years. Metro has carefully considered the comments provided regarding the business operations that involve specialized equipment at this facility.<br><br>Closure and relocation of the Consolidated Fabricators business is not proposed, nor deemed required, as part of the Malabar Yard railroad improvements because the 49th Street Closure would be designed in a manner to allow business access to be maintained. As discussed above in response |

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| | to Comment IND 60-1, In 2020 and 2021, Metro staff collaborated with the commentor/property owner to develop the hammerhead configuration (49th Street Closure Design Option 2) to allow for safe and legal access into and out of the Consolidated Fabricators business with optimal maneuverability for large semi-trucks. During the February 3, 2025 meeting conducted onsite with the commentor/property owner, Metro provided exhibits to demonstrate closure and relocation of the Consolidated Fabricators business is not proposed, nor deemed required, as part of the Malabar Yard railroad improvements because the 49th Street Closure would be designed in a manner to allow business access to be maintained. On February 20, 2025, Metro provided two additional preliminary concepts that were developed for review/consideration based on discussions held onsite with the commentor/property owner and their staff. Metro believes the alternative configurations for truck movements on the property would facilitate ongoing business operations. .<br><br>Both design options and alternative configurations were evaluated to determine if adequate ingress/egress for large semi-trucks would be maintained using a 65-foot-long "CA Legal" truck turning template. The analysis demonstrated that Design Option 1 could impact ingress/egress or large semi-trucks and Design Option 2 would facilitate optimal maneuverability in and out of the Consolidated Fabricators business (see clarifications made to Final EIS Appendix Q Section 3.3, Topic 3.3-B, |

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| | Page 3.3-51). The two additional preliminary concepts that were developed for review/consideration include alternative configurations for truck movements on the property to facilitate ongoing business operations.<br><br>During construction of either design option, temporary access restrictions to a portion of Driveway No. 2 and 3 may be required to implement the 49th Street Closure; however, Metro is required implement standard traffic control measures and safety precautions to maintain safe access to adjacent properties while construction occurs (see Malabar Yard Mitigation Measure TR-1). Metro will continue to coordinate with the property owner to refine their parcel-specific conceptual design during the final design and right of way process.<br><br>Please refer to Comment IND 60-2 response for a discussion related to traffic backups and idling trucks.<br><br>Metro appreciates the comments provided regarding perceived business value and anticipated relocation costs. |

We have estimated relocation and refixturing of my factory over 24 months would cost approximately $35 million. This process would take two years and business revenue of approximately $120 million for those two years would be lost. The problem with that is I do not have enough time and energy in my life to accomplish that. The aspects of this project that have a negative effect on the value of my property has not yet been calculated. IND 60-4 Contd.

The broader regional impact will also have a large negative effect as Confab Steel is one of the last large steel coil service centers left in Vernon servicing the sheet-metal fabrication industry throughout greater Los Angeles and surrounding areas. IND 60-5

The MetroLink Authority has better options than your current plan for disrupting all of Vernon business. To continue on this direction without considering those options while you disrupt and destroy the jobs of so many people working in Vernon would be unconscionable. IND 60-6

Respectfully submitted,

Michael Melideo-President

Consolidated Fabricators Corp.

[redacted]

**IND 60-5** The potential effects on existing industrial operations, including Consolidated Fabricators, were thoroughly evaluated in the Draft EIS/SEIR. This includes considerations related to land use, infrastructure integrity, and any modifications that may affect long-standing foundations or equipment stability. As discussed in Comment 60-1 response, closure and relocation of the Consolidated Fabricators business is not proposed, nor deemed required, as part of the Malabar Yard railroad improvements because the 49th Street Closure would be designed in a manner to allow business access to be maintained. The 49th Street Closure would be configured in a manner to maintain the operational viability of businesses like Consolidated Fabricators and, by extension, support the supply chain and jobs dependent on those businesses.

**IND 60-6** The commenter references the "MetroLink Authority," and Metro is interpreting this to reference Metro and the CHSRA. The NEPA and CEQA processes require consideration of a reasonable range of alternatives and also allow for meaningful engagement during the planning process to ensure decision makers are informed by the views of the public. The alternative sites considered to offset the impacts that would occur to the BNSF West Bank Yard are outlined in Draft EIS/SEIR Appendix Q Section 1.1.1.

During preparation of the Final EIS, after the close of the 45-day public comment period, at the request of the City of Vernon, Vernon Chamber of Commerce, and Los Angeles

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| | County Supervisor Hahn's office, additional analysis was conducted to determine if replacement of BNSF storage tracks could be implemented at BNSF's Hobart Yard facility or BNSF's Los Angeles Junction facility; thereby no longer necessitating the 49th Street Closure as part of the Link US Project. A summary of the determinations with regards to the alternative sites considered in the Final EIS is below:<br>• BNSF Hobart Yard - After coordinating with BNSF and CHSRA, it was determined that mitigating the Link US Project permanent impacts to BNSF storage tracks at BNSF's Hobart Yard is not feasible because the land area proposed for acquisition as part of CHSRA's Los Angeles to Anaheim Project Section of the planned HSR system (approx. 40 acres) adjacent to the existing BNSF Hobart Yard is planned for CHSRA and BNSF improvements separate from the Link US Project mitigation requirements. Specifically, on May 16, 2024, the CHSRA Board of Directors approved study of the Hobart Yard as part of the preferred alternative for the Los Angeles to Anaheim Project Section. For the Link US Project, this assumption is consistent with the assumptions applicable to the Los Angeles to Anaheim Project Section of the planned HSR system.<br>• BNSF Los Angeles Junction Facility - As shown in Final EIS Appendix Q, Section 1.1.1, Figure 1-3, and discussed on Page 1-14, expansion of the Los Angeles Junction to accommodate |

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| | additional storage tracks would require full parcel acquisition of seven private properties with active businesses/buildings located onsite. These property impacts would be greater in magnitude than the effects associated with the Malabar Yard railroad improvements.<br><br>Please also refer to the Comment AGE 3-1 response for a discussion why BNSF could not be compensated via Metro's Relocation Assistance Program/Uniform Relocation Act as with other brick and mortar buildings.<br><br>Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements during construction and operation and develop solutions that preserve the city's economic vitality and connectivity to the extent feasible. |

**Comment Number:** IND 61

**Name:** Martin S. Hoecker-Martinez

**Date Received:** 08/05/24

**Format Received:** Online Comment Form

A loop track should be included in the final plans for LINK US. The highest ridership line into Union Station is the San Bernardino line and the proposed configuration does not allow for that line to have meaningful through running. Even if the current plan does not include the loop track I hope that space can be reserve for a loopback track so that the San Bernardino Line can run through to the Antelope valley and Ventura lines. The long term goal should be to maximize through running at LA Union Station. The proposal should accommodate expansion of the switching infrastructure and include space to connect the any remaining stub end platform (e.g. tracks on platform 7 figure 2-8) to the southern exit of the station. The planning (e.g. in figure 2-9) should include space for any future loop track, if it is not included in this build. IND 61-1

## IND 61 Martin S. Hoecker-Martinez

**IND 61-1** As presented in the Draft EIS/SEIR Section 2, Table 2 1, a total of 14 track alignment alternatives were screened, including 13 with single or double loop tracks. These were rejected from further consideration for failing to meet designated Track Alignment Screening Criteria 1 or 2.

The introduction of service along a loop track to connect the San Bernardino Line to the Antelope Valley or Ventura lines would require those trains to cross other lines entering/existing LAUS from the north hindering railroad operations. Metro understands Metrolink is separately in the process of working to align schedules to ease transfers at LAUS. The Build Alternative and the Build Alternative Design Option
includes run-through tracks for regional and intercity rail trains and HSR trains and aligns with the California State Rail Plan and SCORE Program.

Additionally, the commenter is requesting the design include space to connect the run-through tracks to Platform 7. Platform 7 (Tracks 13 and 14) will remain stub-end under the Build Alternative Design Option, and this design fulfills the provisions of the purpose and need to increase the regional and intercity rail service capacity of LAUS and to improve schedule reliability at LAUS while preserving current levels of freight rail operations. The Build Alternative Design Option would not accommodate a future loop

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| | track; however, would still effectively reduce constraints from the current stub-end tracks configuration. |

**Comment Number:** IND 62

**Name:** Christian John Bradley

**Date Received:** 08/05/24

**Format Received:** Email

Good afternoon!

We are hearing about an RFP regarding the US Link Union Station rebuild. However, when I check the vendor portal for Metro I am not seeing this opportunity. IND 62-1

We are looking forward to receiving more information about this opportunity.

Thanks,

Christian John Bradley

Outreach Manager

[redacted]

## IND 62 Christian John Bradley

**IND 62-1** The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIS/SEIR.

**Comment Number:** IND 63

**Name:** James H. Stewart

**Date Received:** 08/05/24

**Format Received:** Email

The presentation and documentation are scant on what is to be changed in the Historic Parts of Union Station, from the front entrance to the start of the passageways. THAT AREA SHALL NOT BE SUBJECT TO ANY SIGNIFICANT CHANGES, and all changes must reflect the current architecture and decoration.

This is one of the most beautiful buildings in LA. DO NOT MESS WITH IT. DO NOT MODERNIZE IT.

If this was done right, you would return the ticketing area to the former grand ticket hall, leave the wonderful seating in the main hall, take out the vendors that have taken away seating and put them elsewhere. Get a vendor to reopen the former restaurants, both Traxx and the former Harvey House space.

IND 63-1

James H. Stewart

[redacted]

## IND 63 James H. Stewart

**IND 63-1** Metro appreciates the comments provided regarding the preservation of historical elements of LAUS. The Build Alternative Design Option was developed based on new information from public comments received during the 45-day public comment period related to historic preservation, comments from the SHPO and consulting parties as part of the Section 106 process related to historic preservation of LAUS, and new information from the engineering design process that provide opportunities to reduce the size of proposed infrastructure, avoid and reduce the magnitude and intensity of environmental effects as compared to the Build Alternative, and reduce cost in a manner that would still allow Metro to meet all provisions of the purpose and need.

Please refer to the Comment IND 3-1 response for a description of the measures that are required to be implemented to maintain the architectural character of LAUS. As discussed in that response, the Build Alternative Design Option design is intended to avoid, reduce, or minimize impacts to key character-defining features of LAUS. No modifications are proposed to architecturally significant buildings and spaces that comprise the west side of LAUS, including the passenger waiting area, former ticketing room, Harvey House restaurant, and courtyards. Unfortunately, without some modifications to LAUS, physical constraints prevent the Build Alternative or Build Alternative Design Option from being

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| | implemented. Therefore, Mitigation Measure CUL-2 requires preparation and implementation of a Built Environment Treatment Plan (BETP) that details the specific actions Metro would take to resolve adverse effects on built environment historic properties, including the portion of LAUS that would be affected. |

**Comment Number:** IND 64

**Name:** David

**Date Received:** 08/05/24

**Format Received:** Online Comment Form

We've heard about some variation of these Union Station improvements for a long time now. Now is the time to get it done! Strike while the federal government is financing infrastructure. And don't cut corners or push things off to some later date that never comes. This one is too important. With all of the rail connections, future high speed rail, and (hopefully) even a gondola, Union Station has an opportunity to truly become the heart of LA transit, like it was intended to be. And we should be proud of it but not when we're old and grey, but by the 2028 Olympics. Let's show the world that we can still be a place where the most creative minds can get things done, and make things beautiful and functional. Please fast track this (pun intended)

IND 64-1

## IND 64 David

**IND 64-1** The commenter's support for the Project and preference for the future addition of a gondola is noted. Metro is currently considering a gondola at LAUS (Los Angeles Aerial Rapid Transit project) as a separate Project. However, the commenter's suggested concept would not meet the purpose and need of the Project. An analysis of alternatives considered as well as a discussion of alternatives considered but eliminated from detailed analysis is provided in Draft EIS/SEIR Appendix B, *Link US NEPA Alternatives Evaluation Memorandum* and Final EIS Chapter 2, Section 2,1 which demonstrates that CHSRA and Metro fully considered a reasonable range of alternatives to meet the purpose and need of the Project.

**Comment Number:** IND 65

**Name:** Kurt Canfield

**Date Received:** 08/06/24

**Format Received:** Online Comment Form

Big fan of this project. Hope it can be built within the decade. My question is: how many additional trains per day capacity would two through-running tracks give us? IND 65-1

I see that it says up to 830 for 10 tracks and we're currently running 233. Does this mean that with the completion of Phase A we'll have an additional 120 train per day capacity? IND 65-2

Also, please make sure to follow HLA for all roads that will be dug up for this project.

## IND 65 Kurt Canfield

**IND 65-1** The commenter's support for the Project is noted. The interim condition would accommodate two run-through tracks. As shown in the Draft EIS/SEIR Chapter 1, Purpose and Need, Table 1-1, during that condition, Metrolink train movements through LAUS would increase from 185 to 410 train movements per day, and Amtrak train movements through LAUS would increase from 48 to 68 train movements per day. This equates to 245 additional trains per day (225 additional Metrolink trains and 20 additional Amtrak trains).

**IND 65-2** As shown in Draft EIS/SEIR, Chapter 1, Purpose and Need, Table 1-1, the 830 trains per day is projected as early as 2040. See response to Comment IND 65-1 for a description of the additional train movements projected during the interim condition (Phase A).

As discussed in Draft EIS/SEIR Section 2.5, the Build Alternative evaluated in the Draft EIS/SEIR (and the Build Alternative Design Option evaluated in the Final EIS) would facilitate a substantial increase in Metrolink and Amtrak/LOSSAN service and new HSR service through LAUS; however, service increases are only achievable upon implementation of other off-site infrastructure in the region (i.e., SCORE Program). The operational scenarios represent a conservative (high) estimate of the forecasted increases in regional/intercity rail train trips and HSR train trips that could occur

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| | at LAUS and are used for environmental evaluation purposes.<br><br>The Final EIS Chapter 2.0, Section 2.7.1 has been revised as follows:<br><br>On March 5, 2024, Measure HLA, also known as Healthy Streets LA, was passed and requires the City of Los Angeles to install street enhancements outlines in its *Mobility Plan 2035* when making road repairs. |

**Comment Number:** IND 66

**Name:** Jamie Shepherd

**Date Received:** 08/06/24

**Format Received:** Email

I support the LinkUS project and am totally against the objection made by the City of Vernon. This project is absolutely necessary to enable high speed rail and Metrolink traffic, so whatever changes must be made in the City of Vernon to accommodate this project are 100% worthwhile.

We must preference the benefit this project will have for tens of millions of Californians versus the miniscule population of Vernon and the misplaced objection of their city government. IND 66-1

Furthermore, this project will spur transit oriented development around Union Station because it will increase train traffic and thus make living near the station worthwhile for reverse commuters (people commuting out of LA in the morning and returning in the evening), and thereby encouraging the market for more dense housing in an area so desperately in need of more housing.

There are no drawbacks to this project. It is absolutely necessary and should not be delayed. It should have been built ten years ago.

Jamie Shepherd

Los Angeles, CA

[redacted]

## IND 66 Jamie Shepherd

**IND 66-1** The commenter's support for the Project is noted.

**Comment Number:** IND 67

**Name:** Tom Busse

**Date Received:** 08/06/24

**Format Received:** Email

Dear Sir or Madam:

I am a large supporter of the Link project; however, the DEIR is silent on how this project interacts with the plan to cap US 101 for four blocks between Hill and Los Angeles streets, also known as "Park 101." Capping is already described in the Union Station Master Plan and the DTLA Community Plan, so for it to not appear in this DEIR is puzzling. Did the master plan change? IND 67-1

It seems to me integrating the two projects would be transformative and unlock highway funds for this crucial rail project.

Furthermore, the DEIR is silent on how to integrate the future SE Gateway line, as it is uncertain whether that project will be a third central subway or a new viaduct along Alameda Street and whether it will interline with the A line alignment at Union Station. My hunch is Metro will value-engineer in favor of interlining and an above-grade alignment, in which case provision for that alignment built into the Link 21 extension would be the most integrative for regional connectivity in the long-term. IND 67-2

Yours truly,

Tom Busse

[redacted]

## IND 67 Tom Busse

**IND 67-1** The commenter is incorrect, and the Project does consider Park 101 as described in the Draft EIS/SEIR Section 3.16 Cumulative Effects Table 3.16-2. The Union Station Master Plan has not changed due to the Project. The Project does not include a freeway cap because this type of community feature is not required to meet the purpose and need for the Project.

**IND 67-2** Metro lines and stations and other regional/intercity rail trains that are operational outside of the Project Study Area are outside of the scope of the Project and Draft EIS/SEIR analysis. The SE Gateway Line (previously West Santa Ana Branch Line) was considered in the Draft EIS/SEIR, Section 3.16, Table 3.16-2 (#9). The D Line Subway Extension Project (referred to as Line 21 extension) is referred to in the Draft EIS/SEIR as the Purple Line Extension Sections 1, 2, and 3. This project was also considered in the Draft EIS/SEIR, Section 3.16, Table 3.16-2 (#8).

**Comment Number:** IND 68

**Name:** Andrew Cobb

**Date Received:** 08/06/24

**Format Received:** Email

Looks great I hope Metro pursues this quickly and efficiently, I think this is a great project worth expediting IND 68-1

## IND 68 Andrew Cobb

**IND 68-1** The commenter's support for the Project is noted.

**Comment Number:** IND 69

**Name:** Seneca Velling

**Date Received:** 08/07/24

**Format Received:** Email

Hi LA Metro,

This is a comment re: Link Union Station draft EIS/SEIR. I like this plan a lot and it seems to substantially increases station capacity while expanding capacity necessary for future high-speed rail in private and California state capacities. I encourage this to proceed and as a resident of Pasadena and occasional metro user (normally car commute to work at JPL or back and forth to Caltech), I would have much cause to make use of these expanded concourses and improved service capacity. IND 69-1

I would encourage additional add one for more nearby high density housing supported by metro as with other stations too! We need to increase our density in downtown to reduce our carbon footprint print and minimize reliance on automobiles. IND 69-2

Kindly,

Seneca

Pasadena Resident

Seneca J. Velling

[redacted]

## IND 69 Seneca Velling

**IND 69-1** The commenter's support for the Project is noted.

**IND 69-2** The Project supports transit-oriented development in close proximity to LAUS and supports alternative forms of transportation.

**Comment Number:** IND 70

**Name:** Fred Butts

**Date Received:** 08/07/24

**Format Received:** Email

Please restore the original, high number of tracks to the project. The value engineering has eaten away several of the tracks, which will reduce future throughput of trains.

This affects the environment because fewer trains means less frequency, reducing system capacity and forcing future riders to drive instead, increasing greenhouse gas emissions and road noise for people living along arterials and highways. IND 70-1

If there is no budget for the original vision, design the structure with room for a second bridge for extra tracks when funding becomes available.

Thanks,

Fred Butts

Carlsbad, CA

## IND 70 Fred Butts

**IND 70-1** The Build Alternative and the Build Alternative Design Option would increase the regional and intercity rail capacity at LAUS by implementing run-through tracks and eliminating the current stub-end configuration, while preserving freight operations. The Build Alternative or Build Alternative Design Option would also accommodate the planned HSR system, enhances passenger capacity, and improves safety with new concourse-related improvements. As detailed in the Draft EIS/SEIR Chapter 2, 14 track alignment alternatives and 6 concourse concepts were considered during the screening process. The Build Alternative includes 10 run-through tracks. The Build Alternative Design Option includes 8 run-through tracks, although in the event Metro elects to do so, 10 run-through tracks could be accommodated with Platform 6 being elevated as well.

As discussed in the Draft EIS/SEIR Chapter 2, Section 2.5 and Final EIS Chapter 9 Section 9.9, the Build Alternative evaluated in the Draft EIS/SEIR and Build Alternative Design Option evaluated in the Final EIS is a critical component of the SCORE Program because it provides the capacity enhancements for Metro to accommodate the increase in train movements and associated passenger volumes forecast by existing (SCRRA, Amtrak, LOSSAN) and future (CHSRA) operators at LAUS. The Build Alternative and Build Alternative Design Option would facilitate a substantial

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| | increase in rail operational capacity for the region, reduced train idling time at LAUS, and improved on-time performance for trains using LAUS. Implementation of the Build Alternative or Build Alternative Design Option would also indirectly contribute to other cumulative benefits for the region, including a regional reduction of GHG emissions and vehicle miles traveled (VMT). The operational scenarios considered in the Draft EIS/SEIR are only achievable upon implementation of other off-site infrastructure in the region (i.e., SCORE Program). The operational scenarios represent a conservative (high) estimate of the forecasted increases in regional/intercity rail train trips and HSR train trips that could occur at LAUS and are used for environmental evaluation purposes (worst case).<br><br>As discussed in Draft EIS/SEIR Section 3.5, the total annual GHG emissions from construction and operation of the Build Alternative and Malabar Yard railroad improvements would be approximately 9,524 MT of $CO_2e$ per year, which is less than the federal reporting threshold of 25,000 MT of $CO_2e$ per year. Although not required to avoid adverse effects related to GHG emissions, Mitigation Measure AQ-3 would reduce the operational GHG emissions from the Build Alternative. Operation of the Build Alternative could also encourage a modal shift toward transit use and away from single-occupancy vehicle use as mobility in the region improves. Mitigation Measure AQ-3 is applicable to the Build Alternative and the Build Alternative Design Option. This shift may indirectly reduce transportation |

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| | emissions as rail is a more efficient mode of travel and there would be less vehicle congestion and delay on the roads. The No Action Alternative would not realize the beneficial impacts of reducing GHG emissions by indirectly reducing the number of vehicles on the road and indirectly altering regional on road motor vehicle travel. |

**Comment Number:** IND 71

**Name:** Zuri Rashad

**Date Received:** 08/07/24

**Format Received:** Online Comment Form

I believe that the introduction of new rail lines at LA Union Station is necessary to accommodate future ridership, especially with California High Speed Rail being constructed. IND 71-1

## IND 71 Zuri Rashad

**IND 71-1** The commenter's support for the Project is noted.

**Comment Number:** IND 72

**Name:** Dominic Bendinelli

**Date Received:** 08/07/24

**Format Received:** Email

Good Morning,

All regional rail partners including CAHSR are planning expansion and upgrades at some point in the near future and Link Union Station is the key to cohesion. Thank you for doing this necessary future planning so we can see rail expand and improve in our communities. IND 72-1

Your draft EIS (that I discovered today) is very long and complex, too much for me to consume and digest fully in order to give proper feedback, but I would like to offer some generic feedback on what I as a rail rider and CA citizen would like to see. Please plan for all additional capacity for fully electrified rail from all regional rail partners. I understand currently they are not fully electrified at this time, but that is how things are trending especially with CAHSR coming to town. The future of rail in the US (like the rest of the world already has) is fully electric so we must be ready with the proper infrastructure when Metrolink, Amtrak, etc want to buy their electric train sets. Please also consider additional capacity in case the Brightline West does a future direct expansion into Union Station. I appreciate the work you do in working for our bright rail futures! IND 72-2

Thank you,

Dominic Bendinelli

## IND 72 Dominic Bendinelli

**IND 72-1** The commenter's support for the Project is noted.

**IND 72-2** The Build Alternative or the Build Alternative Design Option does not preclude future overhead catenaries to support electrified trains through the Project limits because operators are currently using diesel trains. It should be noted that Metrolink, Amtrak, and CHSRA, as the rail operators through LAUS, would be responsible for the purchase and operation of electrified trains that move through the Project limits.

As stated in the Draft EIS/SEIR Chapter 1, the purpose of the Project is to increase the regional and intercity rail service capacity of LAUS and to improve schedule reliability at LAUS through the implementation of a run through tracks configuration and elimination of the current stub end tracks configuration while preserving current levels of freight rail operations, accommodating the planned HSR system in Southern California, increasing the passenger/pedestrian capacity and enhancing the safety of LAUS through the implementation of a new passenger concourse meeting the multi modal transportation demands at LAUS.

The accommodation of Brightline West, which would operate from Rancho Cucamonga to Las Vegas, is not part of the Project design because it was not considered a reasonably foreseeable project that was raised during the scoping process or during

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| | preparation of the Draft EIS/SEIR. The components of the Brightline West Project do not align with the Project's purpose and need to increase regional/intercity rail service capacity at LAUS. |

**Comment Number:** IND 73

**Name:** Greg Heet

**Date Received:** 08/07/24

**Format Received:** Email

I live/work directly across the freeway from Union Station. We manufacture a musical product and do some audio recording as well. I have raised this concern over the years but thought i would repeat it here. I was assured that there would be efforts made to reduce the train wheel squealing as the trains come across the freeway and make a tight turn up Commercial Street. I think a sound wall along the track might accomplish this. Please let me know if this has been discussed and if a solution has been found. Much thanks. Good luck on this project. IND 73-1

Greg Heet

Heet Sound Products

611 Ducommun Street

Los Angeles, CA 90012

## IND 73 Greg Heet

**IND 73-1** Noise- and Vibration-Sensitive Land Uses within applicable screening distances of the Build Alternative were identified in the Draft EIS/SEIR Chapter 3.6, Figure 3.6-4. The property located at 611 Ducommun Street is not defined as a noise-sensitive receptor per FTA guidelines. No severe operational noise impacts were predicted to occur at any noise or vibration sensitive land uses south of LAUS, including the property located at 611 Ducommun Street. As such, implementation of mitigation measures, such as a sound wall, is not required. Please refer to the Comment IND 13 response. If rail operators determine there is a frequent occurrence of wheel squeal on the run through tracks over US-101, or if there are repeated complaints of squeal, track lubricant could be applied to reduce noise from wheel squeal.

**Comment Number:** IND 74

**Name:** Steven Florman

**Date Received:** 08/07/24

**Format Received:** Email

To whom it may concern,

I have been working in the City of Vernon since 1988 and have been the owner of the office building located at 4580 Pacific Blvd (North-East corner of 46th and Pacific Boulevard) since 1997. Currently the building is home to Wells Fargo Bank and Stacy Medical Center. The ingress and egress of both businesses is located on 46th Street. Stacy Medical Center operates as a 24/7 urgent care treating injured workers in the City of Vernon and surrounding communities. Although we are an urgent care, many companies inadvertently utilize the clinic for medical conditions that would actually be classified as an emergency; as there is no emergency facility in the City of Vernon. We also treat injured/Ill patients detained by the City of Vernon and City of Huntington Park Police.

Due to the nature of our business it is imperative that we maintain 24/7 ingress and egress to our facility in order to allow access to paramedics, police and other emergency services when needed. As a building owner, medical provider and director of a 24/7 urgent care clinic, I have had numerous opportunities to be at the clinic literally "around the clock" and am keenly aware of the traffic patterns surrounding the location. We also maintain security cameras that have a direct line of sight view to the corner of Pacific and 46th Street, the location of an east-west rail spur connecting the Malabar yard to the 46th Street spur. I have observed this intersection for 25 years and can testify that the SPUR I am referring to has been utilized at most two time per month by passing trains that are at most two locomotives and two rail cars in length.

IND 74-1

During a past virtual meeting with the MTA, approximately 3 years ago, I queried them regarding the alleged "Malabar Yard traffic study". They explained that "the study was based on the amount of traffic the spur was designed for not the actual use of the spur" I explained that the study was irrelevant, invalid and a clear misrepresentation of the facts and blatantly deceitful. "Clear misrepresentation of the facts", please refer to the transcripts of the past Zoom meeting.

IND 74-2

## IND 74 Steven Florman

**IND 74-1** During the January 14, 2025, meeting conducted onsite with the property owner, Metro provided exhibits to demonstrate no direct impacts on the commentor's property are proposed and to clarify the Project components in context with the existing property. Metro will continue to coordinate with the property owner to refine their parcel-specific conceptual design during the final design and right of way process.

No modifications to the ingress/egress of the commenter's property, including driveway modifications are proposed and access to property would be maintained 24/7. The existing roadways and intersections adjacent to and within the vicinity of the commentor's property may be subject to temporary detours and lane blockages during construction to implement the connector track, railroad safety/signal improvements and roadway restriping that may be required. Malabar Yard Mitigation Measure TR-1 (described in Draft EIS/SEIR Appendix Q, Section 3.3.5) requires the preparation and implementation of a Traffic Management Plan (TMP) to maintain vehicular traffic throughout construction zones while minimizing potential roadway hazards during construction. The TMP requires traffic flow to be maintained to the safest degree feasible, notice signs to be posted prior to construction in areas where access to local businesses could be affected, and notification to be coordinated with the City of Vernon in advance of street closures, detours, or

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| | | temporary lane reductions. With the implementation of Malabar Yard Mitigation Measure TR-1, no direct adverse effect would occur.<br><br>The information regarding train consists and movements along the existing spur line that traverses Pacific Boulevard (West Seville Connection) was provided by BNSF for use in the environmental evaluation. All of the information and analysis of typical freight railroad operational patterns, and the conclusions in the Draft and Final EIS are based on a combination of historical data, stakeholder input, and expert analysis. Reliance on information provided by BNSF is imperative because Metro does not operate freight service and BNSF is the responsible entity for managing freight operations in southern California, including the train movements at Malabar Yard and Los Angeles Junction. |
| | **IND 74-2** | As correctly stated by the commenter, the conclusions in the Draft EIS/SEIR are based on the maximum train frequencies anticipated to occur upon implementation of the Malabar Yard railroad improvements. Key Issue Response #2 includes clarifications to the information presented in the Draft EIS/SEIR Appendix Q Section 2 regarding freight railroad operations. As shown in Table 2 of Key Issue Response #2, 8 daily train movements occur on the affected routes considered (Figure 7), and in the future condition, a total of 4.85 daily train movements would occur on these same affected routes (Figure 8). As shown in Table 2, the total daily frequency of train |

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| | movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night. Figures 7 and 8 depict the existing and future daily train movements on the affected routes.<br><br>Metro reviewed all current and past comments received regarding the Project, including virtual meeting transcripts for the development of the Draft EIS/SEIR to confirm the traffic study presented in the Draft EIS/SEIR is accurate with an appropriate level of detail to represent the existing and future traffic conditions based on the changes to freight railroad operations.<br><br>The anticipated traffic redistribution and change in traffic along with the list of study intersections and roadway segments was coordinated with the City of Vernon to obtain feedback on the approach before the traffic analysis was performed. Metro did not use "half century old traffic data…" but rather coordinated with BNSF and the City of Vernon to verify information was current and appropriate for use in the environmental evaluation.<br><br>As discussed in Key Issue Response #2, due to the Project related redistribution of existing traffic, a localized traffic analysis was conducted for intersections and roadway segments within the proximity to the Malabar Yard railroad improvements where traffic redistribution is expected to occur. Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized |

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| | impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements.<br><br>The commenter uses the term “pass through tracks” which appear to be referencing the 46th Street Connector that would allow customers in the City of Vernon to be served from the Los Angeles Junction.<br><br>In regard to the safety hazard raised by the commentor, the roadway configuration of 46th Street near the commenter’s property would accommodate two lanes of vehicular traffic and the spur line track (West Seville Connection) in the same location similar to the existing roadway configuration. Roadway restriping may be required to maintain two lanes of vehicular traffic on 46th Street and the new connector track.<br><br>In the existing condition, vehicle travel already occurs parallel to moving trains on the portion of 46th Street adjacent to the commentor’s property. Based on the outcome of the meeting held with the commentor on January 9, 2025, Metro will research safety devices, and barriers that could be incorporated into the design to prevent a collision with trains as cars exit the Stacy Medical Center/Wells Fargo Building Parking Lot on 46th Street (while a train is present). Metro also committed to research potential roadway design modifications that could potentially allow a right-hand turn while a train is passing through the 46th Street/Pacific Boulevard intersection. |

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| | All Malabar Yard railroad improvements would be designed and constructed to comply with CPUC and FRA standards and specifications to maximize safety for both motorized and non-motorized forms of transportation. The commenter provides no basis for why the traffic/safety analysis needs to be redone, as current information with an appropriate level of detail was used in the Draft EIS/SEIR environmental evaluation. Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements and develop solutions that maximize safety and preserve the city's economic vitality and connectivity. |

Another major problem with the traffic study and equally important is that the study pertains to SPURS not PASS THROUGH TRAFFIC. The current east-west rail track that crosses Pacific and runs along 46th Street is a spur engineered to fulfill end deliveries of freight to distributors and manufacturers. The same is true for the East-West SPUR that crosses Soto St. just North of 46th St. The proposed "Malabar Yard" plan is to CONNECT THESE SPURS BY LAYING ADDITIONAL RAIL TRACK CONVERTING BOTH SPURS TO "PASS THROUGH" TRACKS. I believe that any reasonable judge would agree that the MTA study is flawed and biased; and that the MTA traffic engineers should not in good faith utilize half century old traffic data for end spurs when connecting two spurs with additional track laid within 46th street to create "pass through tracks".

Another clear problem with the proposed plan is that MTA is creating a SAFETY HAZARD, a clear and present danger to motorists utilizing 46th Street. Currently no less than two hundred vehicles enter and exit from our parking lot on 46th St. daily. Upon exiting our parking lot theses vehicles will be heading directly toward the East-West railroad tracks embedded in the east bound lane of 46th Street. Our customers vehicles will be exiting our parking lot potentially heading directly into the path of a 480,000 lb moving locomotive and will be required to make a right or left turn only feet away from a moving train in order to avoid collision. Even worse the vehicles will move parallel along 46th Street with the moving trains, without any safety barriers in place. Today, prior to composing this letter, I had the pleasure of speaking Carlos J Montez, Deputy Executive Officer of Metro. Unfortunately he was unable to reassure me that Metro had fully addressed the safety issues regarding the Malabar Yard and stated he would agree to set up an on-site meeting with me and Metro Traffic Engineers in attempt to address my concerns. The proposed plan to CONNECT MORE THAN HALF CENTURY OLD RAIL SPURS BY LAYING ADDITIONAL RAIL TRACK ALONG 46th STREET CONVERTING SPURS TO "PASS THROUGH" TRACKS POSES A CLEAR DANGER TO INDIVIDUALS TRAVELING, WORKING AND LIVING WITHIN THE VERNON COMMUNITY.

It is my belief that any reasonable judge would agree that the MTA traffic study is flawed and biased and that the MTA traffic engineers can not in good faith rely on and utilize half century old traffic data and spur usage data to complete their traffic / safety analysis. It is clear that the MTA must repeat the Traffic / Safety Analysis utilizing current and relevant data prior to proceeding with this project.

IND 74-2
Contd.

Very truly yours,

Steven Florman, MD [redacted]

Stacy Medical Center

[redacted]

[redacted]

[redacted]

**Comment Number:** IND 75

**Name:** Sharon

**Date Received:** 08/07/24

**Format Received:** Email

Vernon is an illegitimate city with a population of only 220 people living in it. Continue with the project through Vernon, the businesses won't feel any downside. IND 75-1

## IND 75 Sharon

**IND 75-1** The commenter's support for the Project is noted. Metro is working closely with City of Vernon staff to identify and address concerns by the City and the business community. In response to concerns and in an effort to avoid, minimize or mitigate impacts to the businesses, Metro modified the design of the Malabar Yard railroad improvements and considered two design options in the environmental evaluation presented in the Draft EIS/SEIR. Design Option 2 at both locations is the preferred design option.

**Comment Number:** IND 76

**Name:** Michele Florman

**Date Received:** 08/07/24

**Format Received:** Email

To Whom It May Concern:

RE: Malabar Yard Connector

Above ground metro train lines are unacceptable short cuts for the County of LA. Metro wants to provide service which they can not even provide Bus safety throughout LA. Citizens will refuse to utilize Metro's trains and buses as they are havens for crime and completely unsafe to travel, it is not like the train services in Europe not even close. IND 76-1

Metro refuses to provide all trains underground due to expense but will chop our cities up, cause more traffic, pollution and an eyesore looking at the trains slicing the cities up and blocking accessibility through the streets. IND 76-2

Major concerns: Noise, excessive vibrations, air quality, community disruptions for many years with non-stop construction blocking of streets, safety and a public eyesore for above ground rails that attract homeless drug addicts. Metro has proven not to be safe. I had to walk an elderly woman past shelterless drug addicts so she could access her home from a metro bus stop. That's not safety in the city Metro can't even get its bus service to be safe and clean. We don't feel safe taking Metro anywhere, too many crimes. Friends were excited when the train went to Santa Monica until they got on the train and were threatened and intimidated. IND 76-3

Metro seeks to block streets, access to businesses, create more traffic, prevent emergency transport, create an above ground eyesore in already ugly streets. The impact on homeowners, businesses and workers traveling to work and functioning in an already chaotic city only adds to the burdens and stress. In Vernon the MALABAR YARD 46th Connector affects parking, access to loading docks, access circulation, building demolition, reconfiguration of vehicular lanes, severe traffic delays at railroad crossings, emergency vehicle response etc. . . Which affects all the traffic coming into Vernon from all neighboring communities cutting people off from Vernon with huge delays. I remember the Alameda corridor project where we waited for over 30 plus minutes for trains to clear wasting gas, time, energy and my patience. IND 76-4

## IND 76 Michele Florman

**IND 76-1** As part of the *Link US Threat and Vulnerability Assessment*, security measures are being integrated into the design, including ROW fencing, intrusion detection, security lighting, and enhanced procedures and training. Additional measures under consideration include baggage screening, explosive detection systems, video surveillance, physical barriers, and HVAC designs to limit chemical or biological threats. Metro's existing safety and security plan will be updated to accommodate these improvements, ensuring no adverse operational effects.

In June 2024, Metro saw its 19th consecutive month of year-over-year ridership growth with 25,181,475 boardings on its bus and rail services, reaching 85.5 percent of its June 2019 pre-COVID ridership level. With 18,792,300 boardings on weekdays, ridership reached 82.1 percent of its pre-pandemic levels. Weekends in June 2024 saw 6,389,175 boardings, reaching 97.7 percent of pre-pandemic weekend ridership from June 2019. As traffic congestion returns, the demand for bus and rail transportation is expected to increase further, highlighting the importance of the Project in supporting regional mobility.

**IND 76-2** The comment provides a general perspective of Metro's services. Metro conducts a thorough alternatives analysis process for all major rail projects, including the consideration of both underground and

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| | | overhead alignments, as deemed feasible. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIS/SEIR. |
| | **IND 76-3** | Please refer to the Comment 76-1 response for a discussion on the *Link US Threat and Vulnerability Assessment*. While the comment appears to be general in nature, since the comment letter indicates the subject is the "Malabar Yard Connector", the response below is specific to the Malabar Yard railroad improvements and related to noise and vibration, air quality, temporary community disruptions/blocking of streets, and safety and aesthetics of above-ground rails.<br>• Noise and Vibration - A screening assessment was performed. Per the FTA and FRA guidelines, no noise or vibration sensitive land uses are located within 1,000 feet of the project footprint (without obstructions) or within 650 feet of the project footprint (with obstructions) (refer to Draft EIS/SEIR Appendix Q Section 3.6, Figure 3.6).<br>• Air Quality – Draft EIS/SEIR Appendix Q Section 3.5, Table 3.5-5 indicates that the annual emissions associated with construction of the Malabar Yard railroad improvements would not exceed the *de minimis* levels. Therefore, no direct adverse effect would occur during construction. The benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by |

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| | rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4. The regional benefits to air quality and GHG emissions as a result of reduced emissions are presented in the Final EIS Appendix Q Section 3.5, Page 3.5-20. The beneficial indirect effect of the Malabar Yard railroad improvements was also clarified in the Final EIS. The Final EIS Appendix Q Section 3.5.4 has been revised as follows:<br><br>Additionally, fewer trains would be traveling along the portion of the Harbor Subdivision north of Malabar Yard between Pacific Boulevard and the City of Vernon jurisdictional limits near 25th Street. This reduction of train movements would result in a benefit of localized air emissions reductions to nearby air quality sensitive receptors that are currently present, in addition to future air quality sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>Please refer to Key Issue Response #3 for a discussion related to the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements.<br><br>• Temporary Community Disruptions/ Blocking of Streets – Malabar Yard |

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| | Mitigation Measure TR-1 requires a Traffic Management Plan (TMP) to be prepared, clearly marked detours to be implemented, and advanced notice be provided to the community. The TMP requires traffic flow to be maintained to the safest degree feasible and the City of Vernon along with other emergency service providers to be notified in advance of street closures, detours, or temporary lane reductions. Malabar Yard Mitigation Measure TR-1 (combined with Malabar Yard Mitigation Measure TR-2) will mitigate traffic impacts in Vernon so that construction activities within roadways minimize community disruption during construction to the extent feasible.<br><br>• Safety and Aesthetics of Above-Ground Rails – The Malabar Yard railroad improvements would be implemented in accordance with applicable regulations and building codes to maximize operational safety. The 46th Street Connector is located between two existing and active freight lines within an urban environment with a heavy presence of freight rail infrastructure. No substantial changes to the aesthetics in the study area are expected to occur (see Draft EIS/SEIR Appendix Q Section 3.4, Page 3.4-28). It should be noted that none of the trains using the Malabar Yard railroad improvements would be for passengers.<br><br>The safety and security of other Metro lines and stations and other regional/intercity rail trains that are |

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| | operational outside of the Project Study Area are outside of the scope of the Project and Draft EIS/SEIR analysis. |

CONCLUSION:

The proposed plan to CONNECT MORE THAN HALF CENTURY OLD RAIL SPURS BY LAYING ADDITIONAL RAIL TRACK ALONG 46th STREET CONVERTING SPURS TO "PASS THROUGH" TRACKS POSES A CLEAR AND PRESENT DANGER TO INDIVIDUALS AND AN UNNECESSARY INCONVENIENCE TO PERSONS TRAVELING, WORKING AND LIVING WITHIN AND BEYOND THE VERNON COMMUNITY. It is my belief that any reasonable judge would agree that the MTA traffic study is flawed and biased and that the MTA traffic engineers SHOUD not in good faith rely on and utilize half century old traffic data and spur usage data to complete their traffic / safety analysis. It is clear that the MTA must repeat the Traffic / Safety Analysis utilizing current and relevant data prior to proceeding with this project.

IND 76-4 Contd.

Sincerely,

MICHELE FLORMAN

**IND 76-4** Please refer to the Comment IND 76-3 response for explanations related to temporary community disruptions/blocking of streets and safety and aesthetics of above ground rails. The responses below address the comments related to traffic delay, life safety and emergency response, operational and physical impacts to businesses (parking, access to loading docks, displacement and relocation), and traffic delays at railroad crossings.

- Traffic Delay - In regard to traffic delays, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/ Fruitland Avenue – operations, and Fruitland Avenue – operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such the local community will not be severely impacted by traffic delays that would affect homeowners, businesses, and workers travelling to work within Vernon.

  Additionally, none of the intersections and roadway segments outside the study area would have any change in traffic behavior due to the Malabar Yard railroad improvements.

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| | The commenter states they waited for over thirty minutes for trains at the Alameda corridor project. Metro has not confirmed whether anyone else experienced that wait time. Nonetheless, Metro does not anticipate any similar wait times to be experienced from the Malabar Yard railroad improvements due to the length of trains, frequency, and time and travel. Based on the queuing analysis performed and in response to property owner questions raised in January 2025, Metro conducted a calculation to determine the percentage of time in a 24-hour period that the four additional train movements per day (and the two existing trains movements) may block access to a driveway on 46th Street. The calculation assumes 6 train movements per day, with a 3,000-foot train plus 500 feet on either end for gate activation and clearing, traveling at 10 miles per hour, and demonstrates that trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Fewer train movements on the Harbor Subdivision would improve citywide circulation and increase opportunities for enhanced community connectivity.<br>• Life Safety and Emergency Response - Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in |

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| | coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a |

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| | conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers.<br>• Operational and Physical Impacts to Businesses - As discussed in Key Issue Response #5, some job loss resulting from potential building demolition may occur; however, as part of Metro's Relocation Assistance Program and the Uniform Relocation Act benefits processes, any businesses subject to building demolition or displacement would be compensated or referred to potential and/or suitable replacement sites. Parking impacts may occur, and when considering both context (total spaces available) and intensity (number of spaces removed), no adverse effect would occur because the properties would still be usable. Operational and physical impacts to businesses would be minimized by implementing Design Option 2, as the preferred design option, at both locations.<br>• Traffic Delays at Railroad Crossings - As presented in the Final EIS Appendix Q Section 3.3, Page 3.3-10 and in Key Issue Response #2, a queuing analysis was prepared at six locations in response to stakeholder engagement activities to determine whether the existing travel lane storage capacity is adequate to accommodate the queue formations generated from redistributed traffic. The results of the queuing analysis demonstrate for the Opening |

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| | Year (2024), no increase to the queue formation would be attributable to the Malabar Yard railroad improvements with exception of northbound through movements at Railroad Crossing #4 where there is 20 feet of incremental addition to the existing queuing that already occurs. The increase in queue formation is not considered a substantial change for two main reasons: 1) the additional 20 feet of queue formation translates into less than a vehicle of queue since one vehicle queue is 25 feet; and 2) because the added queue can be adequately accommodated with the current configuration of the roadway and it would take only one cycle of phasing to clear out the additional 20 feet of incremental addition to the existing queuing that already occurs without the need for any further improvements in lane configuration.<br><br>In response to inquiries related to queuing and traffic congestion at the railroad crossings from Malabar Yard to Los Angeles Junction, a calculation was performed that demonstrates trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Based on consideration of context and intensity, no adverse effect would occur related to traffic delay at the railroad crossing intersections from Malabar Yard to Los Angeles Junction.<br><br>With the Malabar Yard railroad improvements, 3.15 fewer trains would |

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| | operate in the City and half of the train movements would occur at night, which have very little to no impact on traffic. For trains operating during the day, if a train movement occurs during the AM and PM peak periods, there could be some effect, but trains are not anticipated to operate at the same time every day and are not all occurring during the AM or PM peak periods. The hourly schedule to service Vernon customers fluctuates and is variable throughout the week based on customer demand.<br><br>In March 2025, Metro facilitated a Community Meeting/Open House in the City of Vernon. Multiple comments were raised by the community regarding the duration of time that intersections could be blocked by freight trains. In response to these comments, in April 2025 Metro installed cameras at multiple locations throughout the City to record continuous train activity over the course of a week (April 19–25, 2025), 24-hours per day.<br><br>Applying the video footage collected, Metro performed an intersection delay/blockage analysis to document intersection delay/blockage which would occur in the existing condition and with implementation of the Malabar Yard railroad improvements. Metro presented the results of the intersection delay/blockage analysis on June 17, 2025, to the Vernon City Council and on June 23, 2025, to the Vernon Chamber of Commerce. Multiple property owners |

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| | and business representatives attended both meetings.<br><br>Based on the video data collected, results were summarized for two conditions (Actual Condition [based on observed train activity] and Worst-Case Condition) to determine how the Malabar Yard railroad improvements would change intersection delay/blockage at eight locations and effects to citywide vehicular circulation. Results are summarized below:<br><br>1. Actual Condition (based on observed train activity)<br><br>a. Length of Observed Trains: 350 feet to 1,500 feet<br><br>b. Daily Intersection Blockage Results: With Malabar Yard railroad improvements, daily intersection delay/blockage would be reduced by 30 minutes.<br><br>2. Worst Case Condition (consistent with NEPA/CEQA EIS/SEIR evaluation)<br><br>a. Length of Longest Potential Trains: 3,000 feet<br><br>b. Daily Intersection Blockage Results: If longer trains are needed due to customer demand in the City of Vernon, the corresponding reduction in daily intersection blockage with the |

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| | Malabar Yard railroad improvements would also increase as compared to the existing condition. Assuming 3,000-foot trains would operate on any given day, daily intersection delay/blockage would be reduced by over 1 hour and 20 minutes. This reduction is based on the assumption that in the existing condition trains would operate with the same length (3,000 feet) without the Malabar Yard railroad improvements.<br><br>Based on the train observations conducted in April 2025, the data supports the conclusion that with implementation of the Malabar Yard railroad improvements, a citywide circulation improvement would occur. This is primarily because:<br><br>1. 3.15 fewer trains would operate in the City of Vernon, and<br><br>2. In the current condition, BNSF's "train building" activities occur on City streets north of Malabar Yard (Pacific Avenue), which triggers a substantial amount of time when railroad gates are down, delaying/blocking vehicular traffic. With the implementation of the Malabar Yard railroad improvements, most train building activities will be relocated to BNSF's Los Angeles Junction (LAJ) rail yard on the east side of the City. |

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| | Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements during construction and operations and develop solutions that maximize safety and preserve the city's economic vitality and connectivity. |

**Comment Number:** IND 77

**Name:** David Tran

**Date Received:** 08/08/24

**Format Received:** Email

Dear LinkUS Project Team,

I am writing to express my support for the LinkUS project, but I would like to express my concern regarding the potential of cities/municipalities such as the City of Vernon to interfere with the project's overall scope being implemented in its entirety. This project would truly transform the entirety of Southern California. I hope a City of such minute populace can not derail this project. I implore the Project Team to disregard their concerns and continue onward. As a lifelong resident of the SFV, implementing this project would make it super convenient to travel using transit coupled with LA Metro's incredibly ambitious expansion plans and Metrolink's SCORE program aimed at significantly boosting the frequency of their trains. IND 77-1

Accordingly, as a consequence of the increased expansion of train service, I implore the LinkUS team to reconsider implementation of the original proposal that called for 7 stations with access to run-through tracks on the platform (vs. the current plan of 4 stations) and quad-tracking the freeway crossings (as opposed to the current suggestion of double-tracking). I suggest this because the 2024 election is fast arriving and the 2028 Olympics are coming soon to LA: if Harris-Walz and Democrats gain a trifecta, I implore the LinkUS project team to begin discussions regarding the securing of additional funding to implement the original project's scope in its entirety. It would be a cornerstone project for LA and the US. Considering Walz's full commitment to transit the duration of his tenure as Minnesota Governor, I believe implementing the original project would be possible. Furthermore, California High-Speed Rail is coming in probably 2 decades, and it would be smart to build the system to ensure all of California's transit agencies and lines can operate at their peak efficiency now and for decades to come. IND 77-2

## IND 77 David Tran

**IND 77-1** The commenter's support for the Project is noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIS/SEIR.

**IND 77-2** The comment that pertains to 7 stations with access to run-through tracks on the platform and quad-tracking the freeway is unclear as the Link US Project does not include new stations. As discussed in the Draft EIS/SEIR, Chapter 2.0, the Purpose and Need was used to guide and develop criteria to screen track alignment alternatives and concourse concepts. The alternatives considered in the EIS/SEIR evolved since 2016 during the Project planning/development phase, and have been developed as a result of substantial public, agency, and stakeholder feedback received during the initial Link US Project joint EIS/EIR process (not completed), the Link US Project standalone EIR process (completed June 2019), CHSRA's environmental processes for the Burbank to Los Angeles and Los Angeles to Anaheim Project Sections of the planned HSR system (Burbank to Los Angeles EIR/EIS completed March 2022), and the Link US Project EIS/SEIR process.

With regards to the 49th St Closure Design Options, I vote for the Hammerhead Cul-De-Sac. IND 77-3

Best Regards,

David L. Tran

David Tran | B.S. in Aerospace Engineering from the University of California, Los Angeles | M.S. candidate in Aerospace Engineering at UCLA

[redacted]

**IND 77-3** The commenter's preference for the 49th Street Closure Design Option 2 (hammerhead configuration) for the Malabar Yard railroad improvements is noted.

**Comment Number:** IND 78

**Name:** Steve Sobol

**Date Received:** 08/08/24

**Format Received:** Online Comment Form

Vernon should not be allowed to prevent these improvements from happening. Their arguments against the improvements are not legitimate. The city government itself isn't legitimate, either, having, as it does, a history of decades of corruption. Vernon shouldn't even exist as an independent city. IND 78-1

## IND 78 Steve Sobol

**IND 78-1** The commenter's support for the Project is noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIS/SEIR.

**Comment Number:** IND 79

**Name:** Gabe Ketron

**Date Received:** 08/08/24

**Format Received:** Email

A comment for the Link US Draft Environmental Impact Statement:

As a resident of LA county and user of public transport, I would like to lend my support to this initiative to improve LA Union Station's infrastructure and the efficacy of transportation links throughout Southern California. I occasionally use the Metrolink to go between LA and Orange County, and it always struck me as strange to have Union Station act as a terminal, since the Orange County line could as easily travel on to the San Fernando Valley with capital improvements like the one proposed here.

Aside from my overall approval of this project, I'm writing to you to implore you to acknowledge good faith improvements that can be made but ultimately move forward with this initiative's core goal regardless of nitpickers and special interests. Some in this comment session would prefer to use any line of argument at their disposal to achieve the sole goal of this project's failure. These instincts are self-serving, antisocial, explicitly act against the interest of the state, LA county, and LA Metro and should be called out as such. Without more specific information, the formal opposition of the City of Vernon per the KTLA article from yesterday (Aug 7th) may very well also fall under this umbrella. IND 79-1

A quick Google Street View shows that there is almost no traffic or on street parking at the intersection of Seville Ave and 46th st during the day. Any temporary closure from construction can be avoided by most though traffic by going to Leonis Blvd, but Atlas Aluminum, Elecoco, and Derby Dolls, and Wells Fargo may need some accommodation. Focus at this location should be working with these businesses and business whose lots would be built on to make reasonable accommodations during construction. IND 79-2

First responder response times are an issue with any construction, and will not be unqiuely or unexpectedly burdened after construction given Vernon is full of in-use train lines. If there is an instance where there would be a specific unique or unexpected burden from three additional rail crossings the city should identify such and not leave it to the imagination. IND 79-3

## IND 79 Gabe Ketron

**IND 79-1** The commenter's support for the Project is noted.

**IND 79-2** The commenter's suggestions for coordination with property owners and businesses is appreciated, and Metro is coordinating with property owners/tenants and other community members to seek feedback to ultimately reduce impacts on businesses to the maximum extent possible. During construction, Malabar Yard Mitigation Measure TR-1 requires a TMP to be prepared and implemented, clearly marked detours to be implemented, and advanced notice be provided to nearby residences, emergency service providers, public transit and bus operators, the bicycle community, businesses, and organizers of special events. The TMP requires traffic flow to be maintained to the safest degree feasible and the City of Vernon to be notified in advance of street closures, detours, or temporary lane reductions. Malabar Yard Mitigation Measure TR-1 (combined with Malabar Yard Mitigation Measure TR-2) will mitigate traffic impacts in Vernon during construction.

**IND 79-3** The commenter's recommendation for the City of Vernon to identify specific unique or unexpected burdens that may affect response times is appreciated. Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in

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| | coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |

In conclusion, the concerns from the City of Vernon are not insurmountable and should be met in good faith. Conversely, LA Metro should be wary of bad faith comments and criticism with the sole purpose of stalling or ending the project. Please continue building the future of California! IND 79-4

Gabe Ketron

**IND 79-4** The commenter's support for the Project is noted.

**Comment Number:** IND 80

**Name:** Michael Melideo

**Date Received:** 08/08/24

**Format Received:** Email

Attached is my comments regarding this project. IND 80-1

Michael Melideo-President

Consolidated Fabricators Corp.

[redacted]

## IND 80 Michael Melideo

**IND 80-1** Comment noted.

CONFAB
CONSOLIDATED FABRICATORS CORP.

Metro
Attn: Carlos J. Montez
Deputy Executive Officer
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

Re: Metro Link US - Draft EIS/SEIR

Dear Mr Montez,

Please find public comments in response to Metro Link US plans for expansion of the Vernon Malabar Railyard in the City of Vernon. The proposed project will not only will be devastating to the workers that commute to Vernon every day, it will also destroy my business. IND 80-2

The outreach process has been so inconsistent and unreliable, and during the pandemic was nonexistent. IND 80-3

The impact to the community at large will generate huge traffic back-ups, creating unsafe driving conditions and increased pollution due to idling trucks. Furthermore, cutting off certain access routes will negatively affect first responders, creating health and safety concerns. IND 80-4

Regarding your EIS/EIR report: Page 3.2-36-37, the report concludes that "no direct adverse impact would occur" for the closure of 49th Street in Vernon. It states: "The closure of 49th Street in a hammerhead cul-de-sac configuration would result in conversion of a portion of four industrial-zoned properties and modified building setbacks and reduced parking spaces for current businesses..." This is an outright lie and falsehood. The EIS/SEIR report is completely inaccurate and all studies need to be redone. IND 80-5

The 21-foot building setback is a requirement that provides safe barrier between my building and the utility infrastructure that is in close proximity to my building and the proposed expansion. The impact to my business, after being in the city of Vernon for 44 years, would be disastrous in terms of the safety of lives who are the workers and delivery truck drivers who work in the yard every day, and have a devastating adverse economic impact on my business and property. IND 80-6

The nature of my business is buying huge steel coils that require 45-foot tractor-trailer trucks. The nature of my buying , in order to buy competitively , is purcha sing large quantities at a time. Coincidentally, during the last open session at the Metro downtown office, I was receiving 200 truckloads of steel from the docks of L.A. port. In order to avoid penalties from the port authority and demurrage charges, we must receive approximately 25- 30 truckloads per day, added to our current every day business leads us to have to load and unload sometimes 40 truckloads in a single day. No turn around or hammerhead IND 80-7

**IND 80-2** Please refer to Comment IND 26-2 response. In 2020 and 2021, Metro staff collaborated with the commentor/property owner to develop the hammerhead configuration (49th Street Closure Design Option 2) as a means to allow for safe and legal access into and out of the Consolidated Fabricators business with optimal maneuverability for large semi-trucks. During the February 3, 2025, meeting conducted onsite with the commentor/property owner, Metro provided exhibits to demonstrate closure and relocation of the Consolidated Fabricators business is not proposed, nor deemed required, as part of the Malabar Yard railroad improvements because the 49th Street Closure would be designed in a manner to allow business access to be maintained. On February 20, 2025, Metro provided two additional preliminary concepts that were developed for review/consideration based on discussions held onsite with the commentor/property owner and their staff. Metro believes the alternative configurations for truck movements on the property would facilitate ongoing business operations. Metro will continue to coordinate with the property owner to refine their parcel-specific conceptual design during the final design and right of way process.

**IND 80-3** Please refer to Key Issue Response #1 for a discussion of stakeholder engagement activities conducted in the City of Vernon to support the environmental review process for the Malabar Yard railroad improvements. The hammerhead configuration (49th Street Closure Design Option 2) was developed in

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| | | response to the coordination meetings that occurred in 2020 and 2021 with the commenter, during the COVID-19 pandemic. |
| | **IND 80-4** | Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. As discussed in Key Issue Response #2, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Verno Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue – operations, and Fruitland Avenue – operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. Therefore, the Malabar Yard railroad improvements are not expected to cause huge traffic backups that would create unsafe driving conditions.<br><br>Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor |

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| | Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4.<br><br>Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in |

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| | | the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |
| | **IND 80-5** | The 49th Street Closure Design Option 2 would be designed in a manner that would allow for safe and legal access into and out of the Consolidated Fabricators business and adequate ingress/egress for large semi-trucks to be maintained. The driveways at the commenter's property are identified as Driveways 2 and 3 as shown in Draft EIS/SEIR Appendix Q Section 3.3, Figure 3.3-5. Both design options were evaluated to determine if adequate ingress/egress for large semi-trucks would be maintained using a 65-foot-long "CA Legal" truck turning template. The analysis demonstrated that Design Option 1 could impact ingress/egress or large semi-trucks and Design Option 2 would facilitate optimal maneuverability in and out of the Consolidated Fabricators business (see clarifications made to Final EIS Appendix Q Section 3.3, Topic 3.3-B, Page 3.3-51). |

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| | | Loss of jobs is not anticipated because the design configuration for 49th Street Closure Design Option 2 (the preferred design option) allows for trucks to move in and out of businesses. The commenter provides no basis for why all technical studies need to be redone, as current information with an appropriate level of detail was used in the Draft EIS/SEIR environmental evaluation. |
| | **IND 80-6** | Upon implementation of the 49th Street Closure Design Option 2, property lines may be located less than 21 feet from existing buildings; however, no new structures are proposed that would pose safety concerns. The proposed roadway modifications are designed to facilitate essential project components while ensuring safe and legal maneuverability and ingress/egress for adjacent properties. Any necessary setback adjustments would be processed in coordination with the City of Vernon. No changes to the property lines or setbacks would result from 49th Street Closure Design Option 1.<br><br>Either design option for the 49th Street Closure would also be coordinated with utility providers to avoid or minimize utility conflicts. All Malabar Yard railroad improvements would be designed and constructed to comply with CPUC and FRA standards and specifications to maximize safety for both motorized and non-motorized forms of transportation. In addition, truck maneuvering into and out of the commenter's property would no longer occur on active freight tracks and within oncoming traffic |

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| | | using 49th Street, thereby increasing safety for delivery truck drivers entering and existing the property and for motorists traveling on 49th Street. As discussed above in Comment IND 80-2 response, closure and relocation of the Consolidated Fabricators business is not proposed because the 49th Street Closure would be designed in a manner that would allow business access to be maintained. |
| | **IND 80-7** | Please refer to the Comment IND 26-4 response and Comment 80-5 response for a discussion on how property access and associated truck ingress/egress would be maintained upon implementation of the 49th Street Closure. A 65-foot-long "CA Legal" truck turning template was used to demonstrate that trucks could enter and exit the property from the driveways along 49th Street.<br><br>As discussed above in Comment IND 80-2 response, closure and relocation of the Consolidated Fabricators business is not proposed because the 49th Street Closure Design Option 2 would be designed in a manner that would allow business access to be maintained.<br><br>In February 2025, Metro met with the property owner and requested to be present during heavy delivery days when trucks are staged along Santa Fe Street to assess the potential for worsening these types of backups. Metro has committed to coordinate further with the property owner to maintain safe, legal, and adequate access for vehicles |

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| | and large-semi-trucks during construction and throughout operation. |

style turnaround area will ever accommodate this kind of traffic. It will be unsafe and will back up traffic for miles on Santa Fe Ave. Again, your study is completely flawed.

Closing 49th St. will put an end to my business and 85 people will lose their jobs. To try to continue that activity with 49th St. closed , Santa Fe Ave would be backed up for miles with idling trucks and traffic at a standstill.

IND 80-7 Contd.

At 68 years old my plan was to sell Consolidated Fabricators Corp. as a going concern so my 85 employees would continue to have a job. This project will make that transition impossible. You will put 85 people out of work.

Not being able to sell my business along with the severance, I would want to give to so many of the employees, who have been loyal to us for many of them over 30 years , will be a total loss of approximately $58 million. Add to that the negative aspect of the real estate value as a -total damages - calculation.

IND 80-8

We have estimated relocation and refixturing of my factory over 24 months would cost approximately $35 million. This process would take two years and business revenue of approximately $120 million for those two years would be lost. The problem with that is I do not have enough time and energy in my life to accomplish that. The aspects of this project that have a negative effect on the value of my property has not yet been calculated.

The broader regional impact will also have a large negative effect as Confab Steel is one of the last large steel coil service centers left in Vernon, servicing the sheet-metal fabrication industry throughout greater Los Angeles and surrounding areas.

The MetroLink Authority has better options than your current plan for disrupting all of Vernon business. To continue on this direction without considering those options while you disrupt and destroy the jobs of so many people working in Vernon would be unconscionable. Metro Link Authority needs to re-examine all traffic patterns, goods movement thoroughfares,

IND 80-9

Respectfully submitted,

Michael Melideo-President
Consolidated Fabricators Corp.
4848 So. Santa Fe Ave.
Vernon, Ca. 90058
(323)586-4545
Mike@confabsteel.com



**IND 80-8** Please refer to the Comment IND 26-2 response and Comment IND 80-2 response that explains why Metro does not expect the Malabar Yard railroad improvements to cause this business to close or to put its employees out of work.

**IND 80-9** Please refer to the Comment IND 26-4 response and Comment AGE 3-1 response for a discussion on how property access would be maintained upon implementation of the 49th Street Closure.

The commenter provides no basis for why reexamination of traffic patterns or goods movement thoroughfares is warranted, as current information with an appropriate level of detail was used in the Draft EIS/SEIR environmental evaluation.

The NEPA and CEQA processes require consideration of a reasonable range of alternatives and also allow for meaningful engagement during the planning process to ensure decision makers are informed by the views of the public. The alternative sites considered to offset the impacts that would occur to the BNSF West Bank Yard are outlined in Draft EIS/SEIR Appendix Q Section 1.1.1.

During preparation of the Final EIS, after the close of the 45-day public comment period, at the request of the City of Vernon, Vernon Chamber of Commerce, and Los Angeles County Supervisor Hahn's office, additional analysis was conducted to determine if storage tracks could be implemented at

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| | BNSF's Hobart Yard facility or BNSF's Los Angeles Junction facility; thereby no longer necessitating the need for the 49th Street Closure as part of the Link US Project. Further investigation in coordination with BNSF and CHSRA resulted in no changes to the previous results of the alternatives screening process for the following reasons:<br>• BNSF Hobart Yard - Several dozen parcels adjacent to BNSF Hobart Yard are already required and proposed by CHSRA to mitigate impacts on BNSF freight operations as part of CHSRA's Los Angeles to Anaheim Project Section of the planned HSR system. Specifically, on May 16, 2024, the CHSRA Board of Directors approved study of the Hobart Yard as part of the preferred alternative for the Los Angeles to Anaheim Project Section. For the Link US Project, this assumption is consistent with the assumptions applicable to the Los Angeles to Anaheim Project Section of the planned HSR system.<br>• BNSF Los Angeles Junction Facility - As shown in Final EIS Appendix Q, Section 1.1.1, Figure 1-3, and discussed on Page 1-14, expansion of the Los Angeles Junction to accommodate additional storage tracks would require full parcel acquisition of seven private properties with active businesses/buildings located onsite. These property impacts would be greater in magnitude than the effects associated with the Malabar Yard railroad improvements. |

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| | Ultimately, the Metro Board of Directors and the CHSRA Board of Directors will consider the No Action Alternative and balance the costs and benefits before reaching decisions on whether to implement the Build Alternative or Build Alternative Design Option and Malabar Yard railroad improvements. |

**Comment Number:** IND 81

**Name:** Jeremy Stutes

**Date Received:** 08/08/24

**Format Received:** Info Line

Hi, this message is for Link Union Station. This is Jeremy Stutes calling back again to try to get some information about the project. If you could give me a call back. I know that final comment public comment is tomorrow for the draft EIR and there are some questions that the draft EIR did not answer that I have. So I would appreciate call back. My number is [redacted] IND 81-1

## IND 81 Jeremy Stutes

**IND 81-1** This correspondence is a message for Metro staff, not related to the Draft EIS/SEIR. Metro staff has contacted the individual as requested.

**Comment Number:** IND 82

**Name:** Abraham Orozco

**Date Received:** 08/08/24

**Format Received:** Email

To whom it may concern:

I am writing in response to the proposed project and it's direct impact on the Derby Dolls organization and it's community and participants. As a parent of two children in the program, I am concerned at the points brought up by our board and would ask for further clarification and/or reconsideration of this proposed project. IND 82-1

I am in support of the attached letter of concern.

Thank you for your consideration,

Abraham Orozco

## IND 82 Abraham Orozco

**IND 82-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 83

**Name:** Julissa Orozco

**Date Received:** 08/08/24

**Format Received:** Email

To whom it may concern,

It's a pleasure to meet you, my name is Julissa Orozco. I have been involved with the LA Derby Dolls and fully support their concerns with the new development.

I have been involved with the LA Derby Dolls since September 2023. During the past months I have been with them I have improved my mental and physical health through the programs they offer. The LA Derby Dolls provide a strong supportive community to many Angelenos of all backgrounds through such a unique medium. It is important that the impacts to such an organization are taken into account for this development. Failure to do so could have major impacts not only those a part of the league, but also those who love to come watch. IND 83-1

Best,

Julissa Orozco

## IND 83 Julissa Orozco

**IND 83-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 84

**Name:** Bridget Illing

**Date Received:** 08/08/24

**Format Received:** Email

Hello!

My name is Bridget Illing and I'm a member of the Los Angeles Derby Dolls roller derby league. I've called our Vernon facility a second home since I started playing roller derby over 4 years ago. I'm writing to support the Derby Dolls letter in response to the railroad proposal that would directly impact our facility. As one of the leaders of our Events team, I'm responsible for putting on monthly games for the public and would hate to impede our ability to welcome the hundreds of people who attend our games to our track in any way. IND 84-1

Please take the conditions of the Derby Dolls into consideration when making decisions on next steps for this projects.

Thank you,

Bridget Illing (skate name: She-Deviled Egg)

## IND 84 Bridget Illing

**IND 84-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 85

**Name:** Elizabeth Clark

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it May Concern:

I am writing about my concerns for the proposed railroad track installment in the city of Vernon, which would run by the Los Angeles Derby Dolls Dollhalla. I fully support the letter sent out by the Los Angeles Derby Dolls board of directors. My daughter has been skating with LADD juniors for over eight years and the experience and relationships formed have shaped her voice, confidence and strength. It is an important community for her and our family. Before you disrupt this crucial community space, you should go to a bout and a practice and see what you will be ruining. IND 85-1

Best,

Elizabeth Clark

English Teacher

Eagle Rock High School

IB DP 11th/12th Language & Literature

IBMYP 10 Language & Literature

Department Chair

EGI Support

## IND 85 Elizabeth Clark

**IND 85-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 86

**Name:** Jack Cline

**Date Received:** 08/09/24

**Format Received:** Email

Dear Mr Montez,

I am writing to express my concerns regarding the Environmental Impact Report (EIR) for the proposed project. It appears that there are significant errors, omissions, outdated information, and false claims throughout the report. Additionally, the extent of the transportation operations and implementation of the Malabar element will far exceed the immediate study area. IND 86-1

This project will cause substantial, devastating access impacts to economic areas supporting 40,000 jobs. The study area should be consistent with the distance of the current BNSF railroad operations, the study are should be a 3.9-mile radius around the Malabar Yard and 46th Street alignment. Many people in the local communities will be severely impacted by traffic delays, childcare issues, air pollution, and job accessibility. The suggestion that the area is primarily industrial disregards the impact on the 40,000 people who work in the area and will face delays and potentially limited life safety services as a result of the Malabar Yard operations. IND 86-2

Additional significant impacts include the cross-traffic of mile-long trains that will cross Soto, Saville, S. Downey Rd., Alcoa Avenue, and Pacific Avenue. This cross-traffic was not considered as part of the study area but will have a significant gridlock impact on the entire City of Vernon along with the communities of Huntington Park and Maywood. The EIR study appears to be outdated, as it was conducted during a period of limited activity due to COVID-19 and does not reflect the current zoning, general plan, and land use elements of the City of Vernon, which now has a mixed-use residential overlay. IND 86-3

## IND 86 Jack Cline

**IND 86-1** Metro appreciates the comments provided regarding the data and analysis in the Draft EIS/SEIR.

The responses below address the comments related to freight railroad operations and the geographic extent of environmental analysis.

- Freight Railroad Operations - Key Issue Response #2 includes clarifications to the information presented in the Draft EIS/SEIR Appendix Q Section 2 regarding freight railroad operations. All of the information and analysis of typical freight railroad operational patterns, and the conclusions in the Draft EIS/SEIR are based on a combination of historical data, stakeholder input, and expert analysis. The information collected from BNSF as it relates to the affected train routes, train lengths, consolidated freight operations, and reduced train frequencies is summarized in Key Issue Response #2. As shown in Table 2 of Key Issue response #2, 8 daily train movements occur on the affected routes considered (Figure 7), and in the future condition, a total of 4.85 daily train movements would occur on these same affected routes (Figure 8). As shown in Table 2, the total daily frequency of train movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night. Figures 7 and 8 depict the existing and

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| | future daily train movements on the affected routes.<br>• Geographic Extent of Environmental Analysis - Regarding the geographic extent of the Malabar Yard railroad improvements, the major components and project footprint for each design option at both locations are shown on Draft EIS/SEIR Appendix Q Section 2.0, Figure 2-5 through Figure 2-8. The geographic area considered to determine potential traffic-related effects is the traffic study area. The traffic study area does not include intersections or roadway segments between Soto Street and the Los Angeles Junction because the Malabar Yard railroad improvements would not generate new traffic trips and would only result in localized redistribution of existing traffic (Final EIS Appendix Q Section 3.3, Page 3.3-3).<br><br>**IND 86-2** Metro recognizes the unique economic and industrial importance of Vernon, with its 40,000 employees, 1,500 businesses, and interconnected network of operations. The potential impacts of the Malabar Yard railroad improvements, and related changes, including effects on traffic patterns and connectivity were considered in the Draft EIS and presented to property owners and tenants of potentially affected properties in 2020, 2021, 2024, and 2025. The Draft EIS/SEIR includes an analysis of potential traffic, connectivity, and economic impacts, including mitigation measures to avoid and/or minimize disruptions to businesses and jobs in Vernon. Metro is committed to continuing the ongoing coordination with |

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| | BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements during construction and operations and develop solutions that preserve the city's economic vitality and connectivity.<br><br>The responses below address the comments related to the Malabar Yard Study Area, traffic delay and job accessibility, air pollution, and life safety and emergency response.<br><br>• Malabar Yard Study Area - As discussed in Draft EIS/SEIR Appendix Q Section 1.2, the Malabar Yard study area is bound on the north by Vernon Avenue, to the east by Soto Street, to the south by Fruitland Avenue, and to the west by Santa Fe Avenue and is generally used to characterize the affected environment at, and within, the vicinity of Malabar Yard, unless otherwise specified, to support the environmental evaluation of railroad improvements in the City of Vernon. This study area was developed based on the extent of the proposed improvements, and where physical impacts and traffic redistribution is anticipated. The study area and corresponding project footprint supported the scoping process and subsequent environmental evaluation. The comments do not provide justification for use of a 3.9-mile radius around Malabar Yard and 46th Street Connector alignment. |

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| | The analysis does not disregard the 40,000 people working within the City of Vernon, as the analyses includes existing businesses in the area including warehouses, wholesale and distribution services, and other commercial enterprises within the study area. Metro recognizes the unique economic and industrial importance of Vernon, with its 40,000 employees, 1,500 businesses, and interconnected network of operations.<br>• Traffic Delay and Job Accessibility - In regard to traffic delays, the v/c ratio threshold would be exceeded at three intersections and one roadway segment during construction and operations (Vernon Avenue/Santa Fe Avenue – construction, Santa Fe Avenue/Pacific Boulevard – construction and operations, Pacific Boulevard/Fruitland Avenue – operations, and Fruitland Avenue – operations); thereby causing a potential delay that would be considered an adverse effect. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such the local community will not be severely impacted by traffic delays that would affect accessibility to mentioned destinations (jobs and childcare).<br>• Air Pollution - Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle |

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| | idling associated with the Malabar Yard railroad improvements. As discussed in Key Issue Response #3, based on South Coast Air Quality Management's (SCAQMD) definition, sensitive receptors are identified as locations where an individual could remain for 24 hours and includes land uses such as residences, schools, playgrounds and athletic facilities on school property, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. Workers at commercial and industrial facilities are not included because these individuals do not remain onsite for 24 hours.<br><br>• Life Safety and Emergency Response - Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to |

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| | | emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |
| | **IND 86-3** | Trains operating on the 46th Street Connector would be 3,000 feet long (similar to the existing condition) and not expected to be 5,280 feet (1-mile) in length. Final EIS Volume III, Introduction (Key Issue Response #2) includes clarification to the information presented in the Draft EIS/SEIR |

related to the train movements and the length of trains in the existing and future conditions.

The responses below address the comments related to the localized traffic analysis conducted and the intersections and roadway segments considered, mitigation measures to reduce Project-related traffic delays, the COVID-19 factor methodology applied to normalize traffic counts, and the Project's consistency with future mixed-use residential land uses on the City's westside that are planned for as part of the *2023 Vernon Westside Zone Change and General Plan Amendment*.

- Localized Traffic Analysis Conducted/ Intersections and Roadway Segments Considered - The Draft EIS/SEIR includes a thorough and comprehensive evaluation of potential adverse effects from implementation of the Malabar Yard railroad improvements, including traffic and transportation effects associated with railroad operations. The anticipated traffic redistribution and change in traffic along with the list of study intersections and roadway segments was coordinated with the City of Vernon to obtain feedback on the approach before the traffic analysis was performed.

  As discussed in Key Issue Response #2, due to the Project-related redistribution of existing traffic, a localized traffic analysis was conducted for intersections and roadway segments within the proximity to the Malabar Yard railroad improvements where traffic redistribution is expected to occur. The traffic study

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| | area is shown in Draft EIS/SEIR Appendix Q Section 3.3.3, Figure 3.3-1, and demonstrates that traffic impacts at Soto Street, Seville Avenue, and Pacific boulevard were all considered to determine if the Malabar Yard railroad improvements would increase traffic delay to a level that would exceed applicable v/c ratio thresholds.<br><br>For South Downey Road and Alcoa Avenue, the four additional train movements that would pass these intersections for BNSF to serve customers on the west side of the City of Vernon (Exxon and West Seville), two movements would occur at night (7:30pm to 2:00am) and two movements would occur during the day (6:30am to 2:00pm). These intersections were not considered because traffic redistribution is not expected to occur at these locations. Based on the queuing analysis performed and in response to property owner questions raised in January 2025, Metro conducted a calculation to determine the percentage of time in a 24-hour period that the four additional train movements per day (and the two existing trains movements) may block access to a driveway on 46th Street, which can also be used to demonstrate the overall percentage of time trains may block an intersection along the East Seville Connection from Soto Street to the Los Angeles Junction where a detailed traffic evaluation was not conducted. The calculation assumes 6 train movements per day, with a |

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| | 3,000-foot train plus 500 feet on either end for gate activation and clearing, traveling at 10 miles per hour, and demonstrates that trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Based on consideration of context and intensity, no adverse effect would occur related to traffic delay at the railroad crossing intersections from Soto Street to Los Angeles Junction where South Downey Road and Alcoa Avenue are located.<br><br>As presented in the Final EIS Appendix Q Section 3.3, Page 3.3-10 and in Key Issue Response #2, a queuing analysis was prepared at six locations in response to stakeholder engagement activities to determine whether the existing travel lane storage capacity is adequate to accommodate the queue formations generated from redistributed traffic. The results of the queuing analysis demonstrate for the Opening Year (2024), no increase to the queue formation would be attributable to the Malabar Yard railroad improvements with exception of northbound through movement at Railroad Crossing #4 where there is 20 feet of incremental addition to the existing queuing that already occurs. The increase in queue formation is not considered a substantial change for two main reasons: 1) the additional 20 feet of queue formation translates into less than a vehicle of queue since one vehicle queue is 25 |

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| | feet; and 2) because the added queue can be adequately accommodated with the current configuration of the roadway and it would take only one cycle of phasing to clear out the additional 20 feet of incremental addition to the existing queuing that already occurs without the need for any further improvements in lane configuration. At Railroad Crossing #6 (Downey Road south of Vernon Avenue), the queue formation already exceeds the storage capacity in the existing condition (Table 3.3-10) and would continue to exceed the storage capacity during the 2024 No-Build scenario. The queue formation on Downey Road south of Vernon Avenue in the northbound through and southbound through direction remains the same during AM and PM peak hours.<br><br>With the Malabar Yard railroad improvements, 3.15 fewer trains would operate in the City and half of the train movements would occur at night, which have very little to no impact on traffic. For trains operating during the day, if a train movement occurs during the AM and PM peak periods, there could be some effect, but trains are not anticipated to operate at the same time every day and are not all occurring during the AM or PM peak periods. The hourly schedule to service Vernon customers fluctuates and is variable throughout the week based on customer demand.<br><br>In March 2025, Metro facilitated a Community Meeting/Open House in the |

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| | City of Vernon. Multiple comments were raised by the community regarding the duration of time that intersections could be blocked by freight trains. In response to these comments, in April 2025 Metro installed cameras at multiple locations throughout the City to record continuous train activity over the course of a week (April 19–25, 2025), 24-hours per day.<br><br>Applying the video footage collected, Metro performed an intersection delay/blockage analysis to document intersection delay/blockage which would occur in the existing condition and with implementation of the Malabar Yard railroad improvements. Metro presented the results of the intersection delay/blockage analysis on June 17, 2025, to the Vernon City Council and on June 23, 2025, to the Vernon Chamber of Commerce. Multiple property owners and business representatives attended both meetings.<br><br>Based on the video data collected, results were summarized for two conditions (Actual Condition [based on observed train activity] and Worst-Case Condition) to determine how the Malabar Yard railroad improvements would change intersection delay/blockage at eight locations and effects to citywide vehicular circulation. Results are summarized below:<br><br>1. Actual Condition (based on observed train activity) |

a. Length of Observed Trains: 350 feet to 1,500 feet

b. Daily Intersection Blockage Results: With Malabar Yard railroad improvements, daily intersection delay/blockage would be reduced by 30 minutes.

2. Worst Case Condition

a. Length of Longest Potential Trains: 3,000 feet

b. Daily Intersection Blockage Results: If longer trains are needed due to customer demand in the City of Vernon, the corresponding reduction in daily intersection blockage with the Malabar Yard railroad improvements would also increase as compared to the existing condition. Assuming 3,000-foot trains would operate on any given day, daily intersection delay/blockage would be reduced by over 1 hour and 20 minutes. This reduction is based on the assumption that in the existing condition trains would operate with the same length (3,000 feet) without the Malabar Yard railroad improvements.

Based on the train observations conducted in April 2025, the data supports the conclusion that with implementation of the Malabar Yard railroad improvements, a citywide circulation improvement would occur. This is primarily because:

1. 3.15 fewer trains would operate in the City of Vernon, and

2. In the current condition, BNSF's "train building" activities occur on City streets north of Malabar Yard (Pacific Avenue), which triggers a substantial amount of time when railroad gates are down, delaying/blocking vehicular traffic. With the implementation of the Malabar Yard railroad improvements, most train building activities will be relocated to BNSF's Los Angeles Junction (LAJ) rail yard on the east side of the City.

- Mitigation Measures to Reduce Project-Related Traffic Delays - As discussed in the Comment IND 86-2 response above, Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, the Malabar Yard railroad improvements would not be the cause of significant gridlock in Vernon or neighboring communities.

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| | • COVID-19 Factor Methodology - As discussed in Key Issue Response #2, a COVID factor was used to estimated traffic conditions in 2020 without COVID-19. The approach to normalize the traffic count data collected in August 2020 during the COVID-19 pandemic to the traffic levels that existed pre-COVID-19 is presented in Final EIS Appendix Q Section 3.3, Transportation, Page 3.3-4 and summarized in Key Issue Response #2. This methodology is an industry-standard approach taken during the COVID-19 pandemic and was coordinated with the City of Vernon to obtain feedback on the approach before using the adjusted volumes in the traffic analysis. The traffic volumes presented in Draft EIS/SEIR Appendix Q represent the baseline condition at the time the environmental evaluation commenced and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes.<br>• *2023 Vernon Westside Zone Change and General Plan Amendment* – The *2023 Vernon Westside Zone Change and General Plan Amendment* (adopted July 2023) was not considered in the Draft EIS/SEIR environmental evaluation because the zone change and amendment was not formally adopted at the time the Revised NOI was issued in September 2020. As required by 40 C.F.R. 1502.16(c), Metro performed a consistency analysis of the *2023 Vernon Westside Zone Change and General Plan Amendment* (July 2023) for inclusion in the Final EIS. Based on the |

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| | analysis performed in the Final EIS Volume III Introduction Table 5, the Malabar Yard railroad improvements were determined to be consistent with the goals and policies within the *2023 Vernon Westside Zone Change and General Plan Amendment*. Therefore, no conflict would occur with implementation of the Malabar Yard railroad improvements.<br><br>The Malabar Yard railroad improvements would facilitate consolidation of freight service in the city from Los Angeles Junction; thereby reducing the total daily train movements on the Harbor Subdivision parallel to Santa Fe Avenue where future mixed-use development is planned. This reduction of train movements would result in a benefit of localized air emissions and noise and vibration reductions to nearby sensitive receptors that are currently present, in addition to future sensitive receptors that may be present upon the City of Vernon's implementation of the *2023 Vernon Westside Zone Change and General Plan Amendment*.<br><br>In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Draft EIS/SEIR. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential |

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| | impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned. These OMMs are further discussed in the Final EIS Appendix Q Section 3.16, Community Analysis. |

Another significant economic issue is that many businesses in Vernon have multiple locations scattered throughout the city because of its business-friendly environment. These businesses will not be able to operate their multi-faceted operations, which involve moving goods between their existing facilities, due to the delays caused by mile-long trains. This will cost businesses in the City of Vernon hundreds of millions of dollars in business disruptions, delays and shuttering of operations. IND 86-4

I urge the Link US Review Team to reconsider the EIR and take into account the true scope of the project's impact on the local communities, businesses, and the economy. A more comprehensive and updated study is necessary to accurately assess and mitigate these impacts. IND 86-5

Thank you for your attention to this critical matter.

Thank you,

Jack R. Cline Jr.

President Lee & Associates | Los Angeles - Downtown

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[redacted]

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www.lee-associates.com/downtownla/

www.youth-champions.org

**IND 86-4** The commenter provides no basis or substantive input for how economic impacts of truck and automobile traffic delays could be quantified. Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such downstream adverse economic impacts are not expected. Please refer to Comment IND 86-1 through 86-3 responses above and Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements.

**IND 86-5** The comments provided on the Draft EIS/SEIR with regards to the impacts on local communities, businesses, and the economy have been taken into consideration and coordination with the City of Vernon and business stakeholders will be ongoing to minimize the extent of impacts during construction and operation. The commenter provides no basis for asserting the Draft EIS/SEIR analysis does not qualify as comprehensive or why updated studies are warranted to assess impacts. Current information with an appropriate level of detail was used in the Draft EIS/SEIR environmental evaluation. Ultimately, the Metro Board of Directors and the CHSRA Board of Directors will consider the No Action Alternative and balance the costs and benefits before reaching decisions on whether to implement the Build Alternative or

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| | Build Alternative Design Option and the Malabar Yard railroad improvements. |

**Comment Number:** IND 87

**Name:** Corinne Eldridge

**Date Received:** 08/09/24

**Format Received:** Email

To whom it may concern –

I am writing as a member of the Derby Dolls community. My 14 year old daughter has been part of the league for the last 2 years and thrives in the sport and community. Our 9 year old daughter also recently joined and it has built up up her self-esteem and confidence. This is a much needed community athletic resource for girls that is unique and cherished. IND 87-1

Our family is fully supportive of LADD's letter of concern. I have included it here for your reference.

Thank you for your consideration.

Corinne Eldridge

## IND 87 Corrine Eldridge

**IND 87-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 88

**Name:** Alexander Luckett

**Date Received:** 08/09/24

**Format Received:** Email

Hi Metro,

My name is Xander Luckett, and I am kindly reaching out in regard to hopefully receiving some information. I am doing some research on you Link US Phase A Rebid, and have been trying to find a point of contact for this project. I kindly ask if you can please provide me with the point of contact for this project. IND 88-1

Thank you,

Alexander Luckett

Business Development Intern

[redacted]

## IND 88 Alexander Luckett

**IND 88-1** The point of contact for this project is Carlos J. Montez, Deputy Executive Officer at Metro. Additional project information can be found at https://www.linkunionstation.com/.

**Comment Number:** IND 89

**Name:** Ernest Convento

**Date Received:** 08/09/24

**Format Received:** Email

Hello,

In regards to upgrades to the A-Line platform during the LinkUs project, please consider adding a second and possibly third stair to the platform. Currently there is only one stair which can get congested at train arrivals. Another stair or stairs would alleviate that. At peak times there is a rush coming down from an arriving train It can be difficult ascending to the platform until all the passengers have come down the stairs. This could delay one enough to miss a train if it is leaving while you have to wait. IND 89-1

Also, since excavations are already being planned, please consider adding a future platform(s) underground for future rail projects. With the Southeast Gateway line and future others coming to Union Station, it would be great to anticipate new light rail stations. This could be similar to the rail station at the Transbay Terminal in San Francisco, which was built in anticipation of future rail and tunnels. Would it be possible to have them parallel to the current B/D line station so you can use the same portals and mezzanine? IND 89-2

Respectfully,

ernest convento

## IND 89 Ernest Convento

**IND 89-1** The commenter's design preferences are noted. Platform 1 (serving the Gold Line/A-Line) is a high-level platform that would remain in its current configuration. No changes to the platform or vertical circulation elements for this platform would occur because these changes are not a necessary component to fulfill the purpose and need of the Project. The run-through tracks and concourse-related improvements proposed as part of the Build Alternative and the Build Alternative Design Option fulfill the purpose and need of the Project.

**IND 89-2** Chapter 3.16 of the Draft EIS/SEIR Table 3.16-2 includes projects considered as part of the localized and regional cumulative effects analysis. In compiling the cumulative project list, analysts researched past, present, and reasonably foreseeable future actions in the cumulative geographic area by affected jurisdiction via a search of publicly available documents and resources, including conducting an internet search of projects, plans, and proposals. Additionally, State, regional, and local planning documents were reviewed and considered as part of the cumulative effects analysis in this EIS/SEIR. The cumulative effects analysis defines cumulative projects as those likely to occur within the 2040 horizon year and considers planned development within the cities of Los Angeles and Vernon. Specifically, this analysis considers reasonably foreseeable development, transportation and transit projects located

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| | within 0.5 miles of the Build Alternative and Malabar Yard railroad improvements. These projects were selected because they could result in impacts on resources that would also be affected by the Project. Therefore, future projects as described by the commenter have been considered.<br><br>Metro does not have any projects that are reasonably foreseeable project that would require the addition of an underground platform to be added to the Project. The run-through tracks and concourse-related improvements proposed as part of the Build Alternative or Build Alternative Design Option fulfill the purpose and need of the Project. |

**Comment Number:** IND 90

**Name:** Carrie Armellino

**Date Received:** 08/09/24

**Format Received:** Email

To whom it may concern,

I am part of the Los Angeles Derby Dolls (LADD) community and I support LADD's letter of concern. A proper analysis of the impacts of this project to the LADD's facility is needed. IND 90-1

Best,

Carrie Armellino

## IND 90 Carrie Armellino

**IND 90-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 91

**Name:** Chloe Cipolla

**Date Received:** 08/09/24

**Format Received:** Email

To Whom It May Concern,

I am a skater with the LA Derby Dolls. I have been a member of the league since July 2021. Since then I have been attending practice at our Vernon facility 3 days per week, commuting from Burbank.

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging Metro to consider in its report the impacts of the proposed 46th Street Connector on our community recreational athletics organization and its public events.

We rely on our community recreational athletics facility at 2661 E 46th St to run programming 7 days a week. I am concerned about the disruption to our programming during the construction period as well as noise, safety and traffic concerns when the rail line is up and running upon completion.

IND 91-1

Derby is such an important part of my life, and we have been lucky enough to find a home in Vernon after having to move facilities multiple times. We love our facility and we are hoping that this time we are here to stay. Please consider the impacts that this proposed plan may have on the hundreds of athletes who will be affected by this decision.

Thanks in advance for considering our feedback,

Chloe Cipolla

[redacted]

[redacted]

## IND 91 Chloe Cipolla

**IND 91-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 92

**Name:** Sara Fenton

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern,

I am an athlete with the LA Derby Dolls. I have skated with the league for 3 years and practice 2-3 days per week and play weekly scrimmages and volunteer at our monthly public games.

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging the metro to consider in its report the impacts of the proposed 46th Street Connector on our community recreational athletics organization and its public events.

We rely on our community recreational athletics facility at 2661 E 46th St to run programming 7 days a week. I am concerned about the disruption to our programming during the construction period as well as noise, safety and traffic concerns when the rail line is up and running upon completion.

IND 92-1

Thanks in advance for considering our feedback,

Sara Fenton

aka #416 "Margaret Splatwood"

Vice President, Board of Directors

LA Derby Dolls

derbydolls.com

[redacted]

## IND 92 Sara Fenton

**IND 92-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 93

**Name:** Alana White

**Date Received:** 08/09/24

**Format Received:** Email

To Whom It May Concern:

I am a referee and a volunteer with the LA Derby Dolls located at 2661 E 46th St.

I spent 7 months training to become a referee, and although my training continues, I have been a fully drafted referee for 4 years. I typically referee two public bouts a month and come to our athletic facility at least once a week (although usually more) to referee scrimmages, attend trainings and classes, and to complete duties for my additional volunteer positions within the league. I am also using our facility to take private skate lessons from skaters within the league and have added skating to my exercise regimen. IND 93-1

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort, urging the Metro to consider our league and facilities when assessing the impacts of the proposed 46th Street Connector on our community recreational athletics organization and its public events.

We rely on our recreational athletics facility to run programming 7 days a week and as a hub for our community. I am concerned about the disruption to our programming during the construction period as well as noise, safety, and traffic concerns when the rail line is completed.

Thanks in advance for considering our feedback,

Alana White

--

Alana White

[redacted]

[redacted]

## IND 93 Alana White

**IND 93-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 94

**Name:** Connor Webb

**Date Received:** 08/09/24

**Format Received:** Email

Hello LinkUS team,

Attached are my comments regarding the need to accommodate a future addition of a loop track into the design, even if a full loop track was eliminated from the current project.

Thanks,

Connor M. Webb (he, him, his)

MD-PhD Candidate

UCLA-Caltech Medical Scientist Training Program

[redacted]

## IND 94 Connor Webb

Link US DEIR Comments: Loop Track

I'm extremely concerned about the decision to remove the Loop track from the LinkUS plans without full discussion of the limitations this causes to regional service. Because it is not included, **provisions to allow the Loop Track to be added at a later date without a complete service disruption should be included in the LinkUS design.**

Without the Loop Track, there will be a significant limitation to future through-running Metrolink lines due to an unbalance of service from lines entering LAUS from the north and south. The planned high-frequency Metrolink lines are Ventura County (VC) Line, Antelope Valley (AV) Line, San Bernardino (SB) Line, and Orange County (OC) Line. The VC and AV must enter Union Station from the north due to their approach on the River Subdivision and the SB Line crosses the LA river on a bridge just east of the northern throat tracks and therefore also needs to enter from the north. This will be unchanged with the current LinkUS design. The only line that will enter/depart Union Station from the south with the future thru-running tracks is the OC Line (and 91/Perris Valley Line at lower frequency sharing the OC Line). This unbalance of service guarantees a significant number of metrolink services will continue to terminate at Union Station, including after the full LinkUS build-out with 10 through-running tracks (**Figure 1**). Even with CAHSR and Amtrak, that will not be an efficient use of the investment into LinkUS, and harms mobility on our regional rail system. IND 94-1

Even prior to any other structures, the loop track would allow VC or AV Line trains planned to through-run onto the SBL to continue on the River subdivision past Union station, and enter LAUS from the south on the Loop track in a clockwise fashion (**Figure 2**). This circuitous route is still far quicker than transferring at Union Station. Due to the current flat junction of the SB Line and River subdivision on the western bank of the LA river, this temporary pattern would require schedule planning, but due to the low frequency planned for the Riverside Line from time-slot limitations, conflicts would be rare. With a new crossing of the LA River for the SB Line near Caesar Chavez, it would be able to enter Union station from the south (**Figure 3**). This arrangement maximizes efficiency for Union Station and Metrolink.

The biggest advantage of through-running besides station capacity is to easily get passengers to stations near the urban core without transferring. Very few people will be traveling from Van Nuys to Corona, but many people will want to travel from Burbank to CSULA or El Monte. There's a huge mobility benefit by through-running onto SBL because it has CSULA and eventually the Keck/LA General infill station within 5 miles of LAUS, where adding a 15 min transfer to go a few more stations just doesn't make sense for most travelers. The reverse case is similar, by connecting the currently highest ridership Metrolink line to Glendale and Burbank without transferring. IND 94-2

With the Loop Track, an RER-style core system of Chatsworth-Rancho Cucamonga and Sylmar-Laguna Nigel with the studied/planned Keck/LA General, Pico Riviera, River Park, and Grandview-Sonora infills becomes possible (**Figure 4**). That is a much, much better use of the investment into 10 through-running tracks. As it would not be built as part of LinkUS, the cost of simply accommodating a future Loop Track into the design is minimal. However, the potential impact is massive.

**IND 94-1** The commenter's concern for removal of the loop track from Link US Project design is noted. As presented in the Draft EIS/SEIR Section 2.0, Alternatives and Design Options Considered, Table 2-1, a total of 14 track alignment alternatives were screened, including 13 with single or double loop tracks. These were rejected from further consideration for failing to meet designated Track Alignment Screening Criteria 1 and 2.

The introduction of service along a loop track to connect the San Bernardino Line to the Antelope Valley or Ventura lines would require those trains to cross other lines entering/existing LAUS from the north hindering railroad operations. Metro understands Metrolink is separately in the process of working to align schedules to ease transfers at LAUS. The Project supports run-through tracks for regional and intercity rail trains and HSR trains and aligns with the California State Rail Plan and SCORE Program.

The Build Alternative or Build Alternative Design Option design fulfills the provisions of the purpose and need to increase the regional and intercity rail service capacity of LAUS and to improve schedule reliability at LAUS while preserving current levels of freight rail operations. The Build Alternative or Build Alternative Design Option would not accommodate a future loop track; however would still effectively reduce constraints from the current stub-end tracks configuration.

| | |
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| | **IND 94-2** Metro appreciates the comments provided regarding incorporating a loop track into the Link US project design. Please refer to the Comment IND 94-1 response for a discussion on the inclusion of a loop track. |

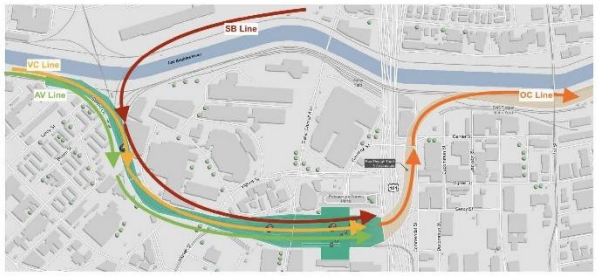



**Figure 1.** Current Link US without the Loop Track leads to a significant limitation of through-running Metrolink Services.

IND 94-3

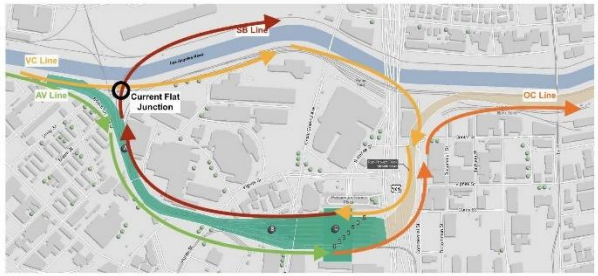



**Figure 2.** Accommodating a future Loop Track allows interim through-running of VC or AV Lines onto the SB Line.

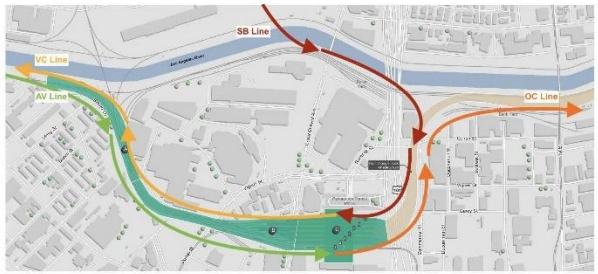



**Figure 3.** A future structure across the LA river for the SB line with the Loop Track allows the most efficient use of LinkUS through-running tracks.

IND 94-4

**IND 94-3** Please refer to Comment IND 94-1 response for a discussion on the inclusion of a loop track

**IND 94-4** Please refer to Comment IND 94-2 response for a discussion on the inclusion of a loop track




**Figure 4**. An example RER/S-Bahn style Metrolink system core enabled by the Loop Track.

IND 94-4
Contd.

**Comment Number:** IND 95

**Name:** Joshua Ellman

**Date Received:** 08/09/24

**Format Received:** Email

Dear Carlos J. Montez,

I am a father of a Junior Derby Doll rink skater and frequent visitor, customer and fan of the L.A Derby Dolls facility in Vernon where this proposed work is scheduled. As a part of the Derby Dolls community, I fully support LADD's letter of concern and hope your organization/metro will look at other alternatives. The noise, pollution and overall disruption will greatly affect a niche skating community important to the City of Vernon and the greater Los Angeles area. IND 95-1

Sincerely,

Joshua M. Ellman

GROOV Marketing & Consulting (Southwest)

[redacted]

## IND 95 Joshua Ellman

**IND 95-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 96

**Name:** Janina Fischer

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern,

I am an athlete with the LA Derby Dolls. I have skated with the league for over 3 years. I attend 2-3 practices weekly, in addition to participating in scrimmages and volunteering at our monthly games.

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging the Metro to consider in its report the impacts of the proposed 46th Street Connector on our community recreational athletics organization and its public events.

IND 96-1

We rely on our community recreational athletics facility at 2661 E 46th St to run programming 7 days a week. I am concerned about the disruption to our programming during the construction period as well as noise, safety, air quality, and traffic once the rail line is completed.

Thank you for considering our feedback,

Janina Fischer

[redacted]

[redacted]

## IND 96 Janina Fischer

**IND 96-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 97

**Name:** Gabriela Varley

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern,

I am an athlete with the LA Derby Dolls. I have skated with the league for over 5 years and practice 2-3 days per week and both volunteer and play at our monthly games.

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging the Metro to consider in its report the impacts of the proposed 46th Street Connector on our community recreational athletics organization and its public events.

We rely on our community recreational athletics facility at 2661 E 46th St to run programming 7 days a week. I am concerned about the disruption to our programming during the construction period as well as noise, safety and traffic concerns when the rail line is up and running upon completion. IND 97-1

This league means so much to us, not only does it help us keep fit mentally and physically, but it is also a place where we have fostered friendships and built a community. Half of our league is made up of juniors aged 7-17 and the juniors program is instrumental in building up kids into becoming amazing strong and powerful adults.

## IND 97 Gabriela Varley

**IND 97-1** Metro has reviewed the videos provided in the comment letter and considered them upon responding to comments in the Final EIS. Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

I have linked below a few videos that capture the spirit of the Derby Dolls and hope that in them you will see how important it is for us to keep this league rolling.

IND 90-1 Contd.

USC Student Film - https://www.youtube.com/watch?v=2JDhU4B3CKY&t=45s

Why Roller Derby is Important - https://www.youtube.com/watch?v=iCsH1g0sYWg

Celebrating 20 years - https://drive.google.com/file/d/1v3yNVWKHzHX-pKRnZj1js2xcr5X40wvY/view?usp=sharing

Thanks in advance for considering our feedback,

Gabriela Varley (Gandalf the Cray #305)

[redacted]

[redacted]

**Comment Number:** IND 98

**Name:** Neda Saleem

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern,

I am an athlete with the LA Derby Dolls.

I have skated with the league for 2 years, practice up to 4 days per week, play weekly scrimmages and volunteer at our monthly games.

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging the Metro to consider in its report the impacts of the proposed 46th Street Connector on our community recreational athletics organization and its public events. IND 98-1

We rely on our community recreational athletics facility at 2661 E 46th St to run programming 7 days a week. I am concerned about the disruption to our programming during the construction period as well as noise, safety and traffic concerns when the rail line is up and running upon completion.

Thanks in advance for considering our feedback.

Best,

Neda Saleem

## IND 98 Neda Saleem

**IND 98-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 99

**Name:** Eve Sanchez

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern, I am a Latinx athlete with the LA Derby Dolls and life-long resident of the Eastside. The Derby Dolls are stewards of the community, I first joined their league as I was awarded their Community Roll Out Scholarship (a grant provided by the City of Vernon) -awarded to residents of low-income communities.

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging the Metro to consider in its report the impacts of the proposed 46th Street Connector on our community recreational athletics organization and its public events. We rely on our community recreational athletics facility at 2661 E 46th St to run programming 7 days a week. I am concerned about the disruption to our programming during the construction period as well as noise, safety and traffic concerns when the rail line is up and running upon completion. The Derby Dolls facility is a hub for community and comradery; its partnership with the community is vital for POC/Latinx and low-income athletes in the nearby communities. Thanks in advance for considering our feedback. IND 99-1

--

In community,

Eve Sanchez | Pronouns: they/them/theirs

[redacted]

## IND 99 Eve Sanchez

**IND 99-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 100

**Name:** Ren Gamboa

**Date Received:** 08/09/24

**Format Received:** Email

Hello,

I am writing in support of the Los Angeles Derby Dolls letter to Metro regarding the Malabar Rail Yard improvements as part of the Link US mitigations. I am a member of the organization and the Draft EIR fails to account for our recreation center being immediately impacted by the 46th rail connector construction and operation.

Further, should this project move forward, it's imperative Metro work with our organization to ensure minimal disruption to our operations to avoid displacement. While we understand other businesses will be impacted by this project in many different ways, being a non-profit member driven organization means we are very vulnerable to displacement. After three other venues in Los Angeles, we've found in Vernon a city willing and able to work with us to grow and thrive as one of four banked track roller derby facilities in the country. We have programming for juniors, work with local non-profits like Chicxs Rockers, teach adults new skills, grow community, and host fun and exciting events for all ages. IND 100-1

If Los Angeles is truly dedicated to being an Olympic city, a sports city, it must allow ALL sports to not only exist, but to thrive. We have serious concerns about this project's effect on our ability to do so.

I've attached the original LA Derby Dolls letter for reference.

Sincerely,

Ren Gamboa

## IND 100 Ren Gamboa

**IND 100-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 101

**Name:** Jennifer Whitehead

**Date Received:** 08/09/24

**Format Received:** Email

The Los Angeles Derby Dolls (LADD) are a non-profit athletic organization that operates at a facility directly impacted by the proposed track alignment for the Malabar Rail Yard on 46th Street. We are located at 2661 E 46th Street in Vernon.

As a long time participant and nonprofit member, I'm concerned that the Metro plan's current draft environmental evaluation does not reflect the existence of our facility adjacent to the planned project. The construction and operational phases would directly impact our programs for youth and adult athletes. IND 101-1

I hope that any further plans can do a more careful analysis of our part in the neighborhood in Vernon, including traffic studies, and more careful thought as to the impact on the Los Angeles Derby Dolls from the project.

Sincerely,

Jennifer Whitehead

[redacted]

## IND 101 Jennifer Whitehead

**IND 101-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 102

**Name:** Barbara Sazama

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern,

I am an athlete and trainer with the LA Derby Dolls.

I have skated with the league for 12 years and practice 2-4 days per week and play weekly scrimmages and volunteer or play at our monthly games.

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging METRO to consider in its report the impacts of the proposed 46th Street Connector on our community recreational athletics organization and its public events.

We rely on our community recreational athletics facility at 2661 E 46th St to run programming 7 days a week. I am concerned about the disruption to our programming during the construction period as well as noise, safety and traffic concerns when the rail line is up and running upon completion.

IND 102-1

LA Derby Dolls just celebrated its 20 year anniversary last year. Please reconsider the incomplete impact report so that we can continue to be part of what makes Los Angeles special.

Thanks in advance for considering our feedback,

Barbara C Sazama

[redacted]

[redacted]

## IND 102 Barbara Sazama

**IND 102-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 103

**Name:** Joseph Rogers

**Date Received:** 08/09/24

**Format Received:** Email

Hello LA Metro,

My 13 year old daughter has been participating in the LA Derby Dolls community at 2661 E 46th Street for over two years and she frequently states how it's the only activity in her life where she can truly be herself.

As her father, I was pleasantly surprised by the supportive "girl power" community aspect of Derby Dolls. It's essential that this location not be disrupted so they can continue operation for all the girls (ages 7-17) and their families who have no other option in LA for this sport and community.

My family fully supports LADD's letter of concern (attached) and hope that the Environmental Evaluation committee will revisit and correct their faulty findings with regards to Derby Dolls facility.

IND 103-1

Best regards,

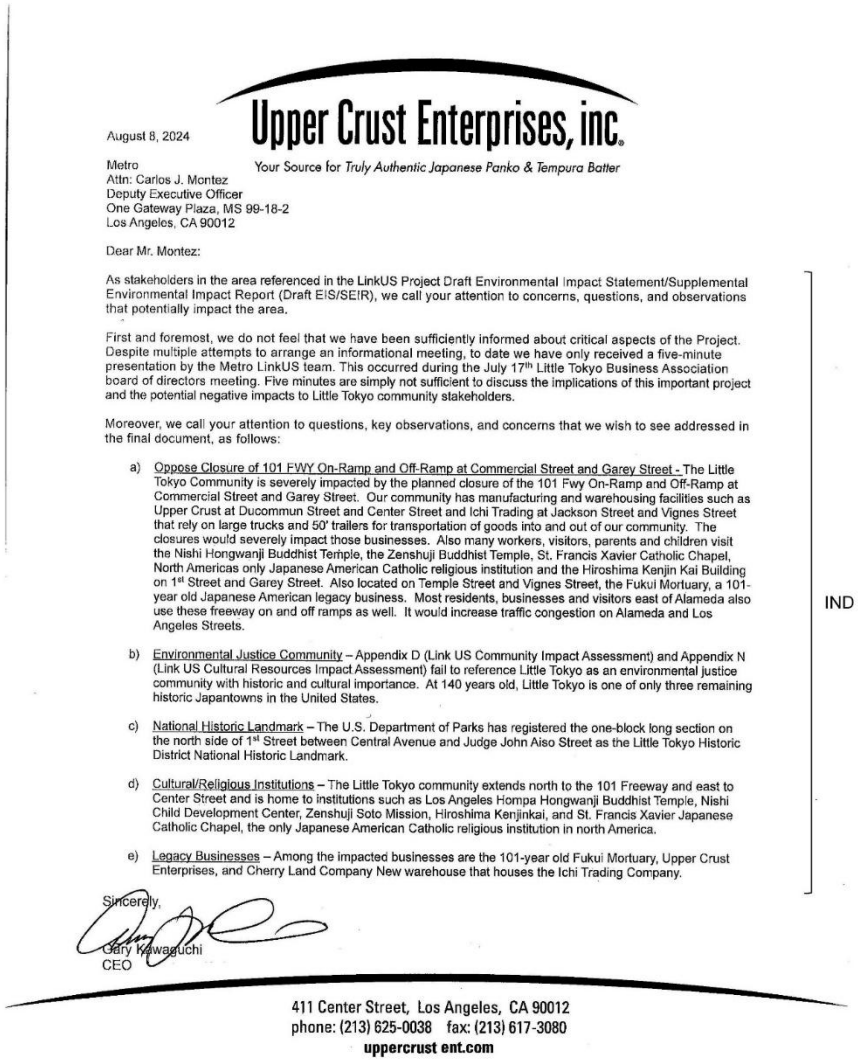
Joseph Rogers

Los Angeles, CA

## IND 103 Joseph Rogers

**IND 103-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10).

| | |
|---|---|
| **Comment Number:** IND 104<br>**Name:** Gary Kawaguchi<br>**Date Received:** 08/09/24<br>**Format Received:** Email | **IND 104 Gary Kawaguchi** |



Upper Crust Enterprises, inc.
Your Source for *Truly Authentic Japanese Panko & Tempura Batter*

August 8, 2024

Metro
Attn: Carlos J. Montez
Deputy Executive Officer
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

Dear Mr. Montez:

As stakeholders in the area referenced in the LinkUS Project Draft Environmental Impact Statement/Supplemental Environmental Impact Report (Draft EIS/SEIR), we call your attention to concerns, questions, and observations that potentially impact the area.

First and foremost, we do not feel that we have been sufficiently informed about critical aspects of the Project. Despite multiple attempts to arrange an informational meeting, to date we have only received a five-minute presentation by the Metro LinkUS team. This occurred during the July 17th Little Tokyo Business Association board of directors meeting. Five minutes are simply not sufficient to discuss the implications of this important project and the potential negative impacts to Little Tokyo community stakeholders.

Moreover, we call your attention to questions, key observations, and concerns that we wish to see addressed in the final document, as follows:

a) Oppose Closure of 101 FWY On-Ramp and Off-Ramp at Commercial Street and Garey Street - The Little Tokyo Community is severely impacted by the planned closure of the 101 Fwy On-Ramp and Off-Ramp at Commercial Street and Garey Street. Our community has manufacturing and warehousing facilities such as Upper Crust at Ducommun Street and Center Street and Ichi Trading at Jackson Street and Vignes Street that rely on large trucks and 50' trailers for transportation of goods into and out of our community. The closures would severely impact those businesses. Also many workers, visitors, parents and children visit the Nishi Hongwanji Buddhist Temple, the Zenshuji Buddhist Temple, St. Francis Xavier Catholic Chapel, North Americas only Japanese American Catholic religious institution and the Hiroshima Kenjin Kai Building on 1st Street and Garey Street. Also located on Temple Street and Vignes Street, the Fukui Mortuary, a 101-year old Japanese American legacy business. Most residents, businesses and visitors east of Alameda also use these freeway on and off ramps as well. It would increase traffic congestion on Alameda and Los Angeles Streets.

b) Environmental Justice Community – Appendix D (Link US Community Impact Assessment) and Appendix N (Link US Cultural Resources Impact Assessment) fail to reference Little Tokyo as an environmental justice community with historic and cultural importance. At 140 years old, Little Tokyo is one of only three remaining historic Japantowns in the United States.

c) National Historic Landmark – The U.S. Department of Parks has registered the one-block long section on the north side of 1st Street between Central Avenue and Judge John Aiso Street as the Little Tokyo Historic District National Historic Landmark.

d) Cultural/Religious Institutions – The Little Tokyo community extends north to the 101 Freeway and east to Center Street and is home to institutions such as Los Angeles Hompa Hongwanji Buddhist Temple, Nishi Child Development Center, Zenshuji Soto Mission, Hiroshima Kenjinkai, and St. Francis Xavier Japanese Catholic Chapel, the only Japanese American Catholic religious institution in north America.

e) Legacy Businesses – Among the impacted businesses are the 101-year old Fukui Mortuary, Upper Crust Enterprises, and Cherry Land Company New warehouse that houses the Ichi Trading Company.

IND 104-1

Sincerely,

Gary Kawaguchi
CEO

411 Center Street, Los Angeles, CA 90012
phone: (213) 625-0038 fax: (213) 617-3080
**uppercrust ent.com**

**IND 104-1** Please refer to the comprehensive responses to comments in the letter from Little Tokyo Business Association. The letter from Little Tokyo Business Association has a naming designation referred to in this Final EIS as "ORG 8" (see responses to Comments ORG 8-1 through ORG 8-6).

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| **Comment Number:** IND 105<br>**Name:** Dennis Berman<br>**Date Received:** 08/09/24<br>**Format Received:** Email | **IND 105 Dennis Berman** |

August 9, 2024
*VIA EMAIL*

Carlos J. Montez
Deputy Executive Officer
Los Angeles County Metropolitan Transit Authority
One Gateway Plaza, MS 99-13-2
Los Angeles, CA 90012
213.418.3241
linkunionstation@metro.net

**Re: Public Comment Letter Regarding Link Union Station Project**
**Draft Environmental Impact Report (State Clearinghouse No. 2016051071)**

Dear Mr. Montez:

Thank you for the opportunity to review and provide input on the Draft Environmental Impact Statement and Supplemental Environmental Impact Report ("Draft EIS/SEIR") prepared jointly by the Los Angeles County Metropolitan Transportation Authority ("LA Metro") and the California High-Speed Rail Authority ("CHSRA") (together, the "Lead Agencies") pursuant to the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"). The Draft EIS/SEIR document was prepared for a proposed project involving the extension of rail tracks at Los Angeles Union Station and related rail development on and around the BNSF Railway's Malabar Yard in the City of Vernon ("Project"). IND 105-1

As a property owner in the City of Vernon directly affected by the Malabar Yard component of the Project, I am writing to express my strong opposition to the Draft EIS/SEIR and the Project as currently proposed. My property is located at 4550 Seville Avenue directly along the portion of 46th Street where new rail track is proposed. I am a prime example of a community member that will be permanently harmed by the careless decision to undertake the Vernon component of the Project.

As detailed below, the Project is tremendously detrimental to Vernon property owners such as myself, and to the entire Vernon community. Furthermore, the Project as proposed contains significant and serious environmental and legal deficiencies that weigh heavily against Project approval. I would thus urge that the Project be disapproved, approved without the Vernon component, or else that further environmental study be undertaken. IND 105-2

**IND 105-1** Metro appreciates the time taken by the reviewer to review the Draft EIS/SEIR and providing feedback. Metro values the input received as it helps in preparing a comprehensive evaluation of the Project and potential impacts.

**IND 105-2** Metro has received this property owner's opposition to the Project and preference for the Project to be approved without the Malabar Yard railroad improvements is noted. The property located at 4550 Seville Avenue would not be subject to physical impacts resulting from the alignment of the 46th Street Connector as proposed by the Malabar Yard railroad improvements.

The commenter asserts environmental and legal deficiencies exist in the Draft EIS/SEIR and responses to specific comments are provided further below.

My Property – 4550 Seville Avenue

I own property located at 4550 Seville Avenue in the City of Vernon. This property is located at the northeast corner of 46th Street and Seville Avenue within what the Draft EIS/SEIR refers to as an "Area of Impact". (Draft EIS/SEIR, Figure 8.) This area adjacent to and abutting my property is also said to be an area of "Permanent Impacts". (Draft EIS/SEIR Appendix Q, p. 2-21.) Specifically, under the proposed Project, 46th Street would be bisected by new rail track directly in front of my property. IND 105-3

Additionally, rail gate arms are proposed on Seville Avenue at 46th Street directly across from my property. The Draft EIS/SEIR found that the railroad crossing and gate arms proposed at this intersection of Seville Avenue and 46th Street would introduce a roadway hazard due to queuing that would cause vehicular traffic to extend across 46th Street, and that this was a significant and unavoidable environmental impact of the Project even following the implementation of mitigation measures. (Draft EIS/SEIR, p. ES-cxvi.)

The mere creation of the rail track along my property's portion of 46th Street creates what the Draft EIS/SEIR refers to as the "physical division of an established community", yet erroneously and offensively the analysis concludes that there are "no established communities within or adjacent to the Project footprint". (Draft EIS/SEIR, p. 3.2-33.) My business and the other businesses around it form a strong industrial community with a legacy of cooperation that will be significantly harmed by the Project. And the Draft EIS/SEIR wholly fails to take this into account. IND 105-4

The Local Business at My Property

I operated a wholesale fruit and vegetable company at this property from 1988 to 2022 and have always been proud to call Vernon home for my business and my employees. In 2022 I sold the business and entered into a 10-year lease with the new owners so that the business could continue at this location because this site worked so well for our business. The business continues today to operate at the property from 2:00 a.m. until 4:00 p.m. Monday through Friday.

The handling of fresh fruits and vegetables demands uninterrupted movement to ensure freshness and on time delivery to our customers, and accordingly the property receives 60 to 80 truck visits per day, including large semi tractor trailers that rely on the ability to make wide turns on 46th Street and on Seville Avenue. Separately, 15 additional semi tractor trailers rent space to park at the property and expect regular access to the property. IND 105-5

**IND 105-3** The commentor is referring to Draft EIS/SEIR Appendix Q Section 2.0, Figure 2-8 that depicts the temporary and permanent impact areas for Malabar Yard railroad improvements (Design Option 2). What is not depicted on Figure 2-8 is the parcel lines to demonstrate that the project footprint does not encroach onto the subject parcel. Across from the commenter's property, two active freight tracks already cross 46th Street. Draft EIS/SEIR Appendix Q Section 2.0, Figure 2-11, more clearly identifies the parcels potentially affected by the Malabar Yard railroad improvements. During the January 9, 2025, meeting conducted onsite with the property owner, Metro provided exhibits to demonstrate no physical impacts on the commentor's property are proposed and to clarify the Project components in context with the existing property.

**IND 105-4** The commentor is providing an overview of the Draft EIS/SEIR evaluation. Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements.

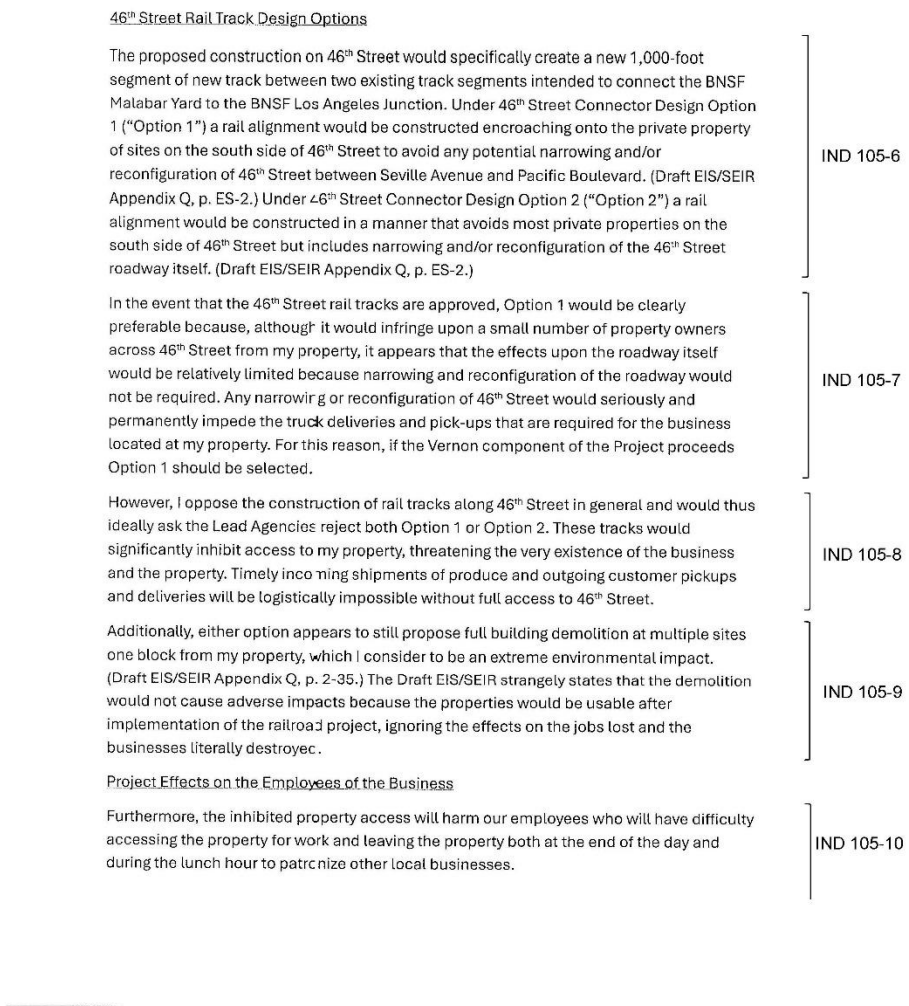
It is important to clarify that the 46th Street Connector is proposed on the south side of 46th Street, which is the side away from the commenter's property. While Metro does recognize the strong industrial community within Vernon, the existing land uses and presence of two existing spur line tracks that are already operational through the City was

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| | | also considered to provide context and intensity to the impact evaluation. Access to the commenter's property and buildings will be maintained. |
| | **IND 105-5** | Under either Design Option 1 or Design Option 2, proposed roadway and civil improvements would be designed and coordinated with the City of Vernon, CPUC, and adjacent business stakeholders to minimize impacts to properties and business operations to the maximum extent possible while still meeting applicable regulatory requirements. The existing driveway for this property is referred to as Driveway 11 in Draft EIS/SEIR Appendix Q Section 3.3, Figure 3.3-5. Based on the heavy presence of industrial land uses and stakeholder feedback received on the heavy truck use in the traffic study area, a truck turning movement analysis was performed to evaluate the impact on truck turning ingress/egress and vehicular circulation in terms of the ability to make safe movements.<br><br>With the proposed 46th Street Connector and the proposed at-grade railroad crossing enhancements at Driveway 11, the Draft EIS/SEIR disclosed that the raised median on either side of the railroad crossing along 46th Street would reconfigure the truck turning ingress/egress for large trucks using the driveway on 46th Street. The Draft EIS/SEIR disclosed that Driveway 11 would be maintained but would become right-in/right-out only. After the close of the public comment period, and upon further field investigation of the commentor's property, it was confirmed by Metro that Driveway 11 is |

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| | used for trucks to enter the property, and trucks exit the property from a different driveway on Seville Avenue. Based on these observations, the Final EIS Appendix Q, Section 3.3 has been revised as follows:<br><br>Driveway No. 11: The raised median on either side of the railroad crossing along 46th Street would not affect the ability for large trucks to enter the property from 46th Street. Trucks currently exit the property on Seville Avenue, and no change to this exiting movement is proposed. Driveway 11 would be maintained in its current configuration upon implementation of either design option for the 46th Street Connector. The location of medians along 46th Street would be coordinated with the CPUC, City of Vernon, and property owners during final design, and the ultimate extent of the medians may be subject to change based on further coordination and approval from CPUC.<br><br>Driveway Nos~~. 11~~ and 12: The raised median on either side of the railroad crossing along 46th Street would reconfigure the truck turning ingress/egress for Driveway 12. ~~these two driveways~~. ~~Both driveways~~ Driveway 12 would be maintained but would become right in/right out only as a result of either design option for the 46th Street Connector. The location of medians along 46th Street would be coordinated with the CPUC, City of Vernon, and property owners during final design, and the ultimate extent of the medians may |

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| | be subject to change based on further coordination and approval from CPUC.<br><br>It can be reasonably anticipated there would be no change to the timely shipments and pickups at the property because access would be maintained.<br><br>Based on prior meetings with Metro and the property owner, potential modifications to the design of the median and at-grade railroad crossing improvements could be explored during final design, including adding quad gates and removing or shortening the proposed center medians to maximize ingress/egress to the commentor's property. These types of design considerations will be coordinated with BNSF, City of Vernon, CPUC, and the affected property owners as design progresses.<br><br>In regard to project construction, Driveway 11 may be subject to temporary access restrictions during construction activities. However, with the implementation of Malabar Yard Mitigation Measure TR-1 (described in Section 3.3.5), which requires the preparation and implementation of a TMP to minimize construction-related roadway hazardous conditions, these impacts would be minimized. The TMP requires traffic flow to be maintained to the safest degree feasible, notice signs to be posted prior to construction in areas where access to local businesses could be affected, and notification to be coordinated with the City of Vernon in advance of street closures, detours, or temporary lane reductions. |

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| | The Project operations and construction would not affect the 15 semi tractor trailers that rent space to park at the property. |



46th Street Rail Track Design Options

The proposed construction on 46th Street would specifically create a new 1,000-foot segment of new track between two existing track segments intended to connect the BNSF Malabar Yard to the BNSF Los Angeles Junction. Under 46th Street Connector Design Option 1 ("Option 1") a rail alignment would be constructed encroaching onto the private property of sites on the south side of 46th Street to avoid any potential narrowing and/or reconfiguration of 46th Street between Seville Avenue and Pacific Boulevard. (Draft EIS/SEIR Appendix Q, p. ES-2.) Under 46th Street Connector Design Option 2 ("Option 2") a rail alignment would be constructed in a manner that avoids most private properties on the south side of 46th Street but includes narrowing and/or reconfiguration of the 46th Street roadway itself. (Draft EIS/SEIR Appendix Q, p. ES-2.)

IND 105-6

In the event that the 46th Street rail tracks are approved, Option 1 would be clearly preferable because, although it would infringe upon a small number of property owners across 46th Street from my property, it appears that the effects upon the roadway itself would be relatively limited because narrowing and reconfiguration of the roadway would not be required. Any narrowing or reconfiguration of 46th Street would seriously and permanently impede the truck deliveries and pick-ups that are required for the business located at my property. For this reason, if the Vernon component of the Project proceeds Option 1 should be selected.

IND 105-7

However, I oppose the construction of rail tracks along 46th Street in general and would thus ideally ask the Lead Agencies reject both Option 1 or Option 2. These tracks would significantly inhibit access to my property, threatening the very existence of the business and the property. Timely incoming shipments of produce and outgoing customer pickups and deliveries will be logistically impossible without full access to 46th Street.

IND 105-8

Additionally, either option appears to still propose full building demolition at multiple sites one block from my property, which I consider to be an extreme environmental impact. (Draft EIS/SEIR Appendix Q, p. 2-35.) The Draft EIS/SEIR strangely states that the demolition would not cause adverse impacts because the properties would be usable after implementation of the railroad project, ignoring the effects on the jobs lost and the businesses literally destroyed.

IND 105-9

Project Effects on the Employees of the Business

Furthermore, the inhibited property access will harm our employees who will have difficulty accessing the property for work and leaving the property both at the end of the day and during the lunch hour to patronize other local businesses.

IND 105-10

**IND 105-6** The commenter is providing background information regarding the design options considered. No response is required.

**IND 105-7** The commenter's preference for 46th Street Design Option 1 is noted. It should be clarified that narrowing of the lanes on 46th Street is not proposed, rather the reconfiguration mentioned would entail restriping to accommodate the vehicular lane widths required by the City of Vernon. Some parking loss may be required to maintain the adequate vehicular lane widths required. With vehicular lane widths being maintained, no impacts on truck deliveries and pick-ups are anticipated to occur.

**IND 105-8** The commentor's preference to not implement the 46th Street Connector is noted. Please refer to the Comment IND 105-5 response and comment IND 105-7 response.

**IND 105-9** Design Option 1 may require demolition of up to 3 buildings and Design Option 2 may require demolition of one building. Any demolition activities would be conducted in accordance with all applicable laws, regulations, and applicable mitigation measures from the Draft EIS/SEIR to reduce potential environmental effects. There are no noise sensitive receptors near the buildings that may be potentially demolished that would be subject to noise and vibration impacts. Construction emissions, which includes demolition activities, are presented in the Draft EIS/SEIR Appendix Q Table 3.5-5. Annual construction emissions

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| | associated with any combination of design options for the Malabar Yard railroad improvements would not exceed the *de minimis* levels. Any dust generated by construction activities would be managed in accordance with applicable regulations. Therefore, no direct adverse effect would occur and construction is not considered an extreme environmental impact. Effects on jobs displaced were disclosed Section 3.13. Please refer to Key Issue Response #5 for a discussion of operational and physical impacts to businesses.<br><br>**IND 105-10** Please refer to the Comment IND 105-5 response for additional information of how proposed roadway and civil improvements would be implemented to minimize property access impacts to the maximum extent possible while still meeting applicable regulatory requirements. Upon implementation of the Malabar Yard railroad improvements, Driveway #11 would still allow for pickups, cars, and large trucks to enter the property. The Malabar Yard railroad improvements would result in traffic redistribution, not traffic generation; therefore, an increase in commute times is not expected. No indirect effects associated with job loss or relocation of employees is expected to occur from increased traffic congestion and commute times (See Key Issue Response #2). |

But the effects on my property's employees will extend beyond just property access. We have worked hard over many years to build a strong workforce for this business and if the Project is undertaken as proposed we fear that they will seek employment elsewhere due to increased commutes if the Project is approved. This pattern is likely to spread to the rest of Vernon's industrial district if the Project is approved; few employees will want to work in an area that becomes known for traffic congestion, as described in more detail immediately below. IND 105-10 Contd.

Transportation and Traffic Impacts

Northbound and southbound traffic along my property would be directly halted by the proposed rail gate arms on Seville Avenue at 46th Street, and the Draft EIS/SEIR acknowledges that this would create an adverse environmental impact due to vehicle queuing. (Draft EIS/SEIR, p. 3.16-27.) The resulting delays could be extreme because, as the Draft EIS/SEIR acknowledges, the "foreseeable length of future trains operating on the 46th Street Connector could range from 2,000 feet to 4,000 feet". (Draft EIS/SEIR Appendix Q, p. 2-4.) IND 105-11

The delays would also affect the connector streets that trucks use to access my property. But the study of traffic impacts in the Draft EIS/SEIR fails to adequately take this circumstance into account, especially considering that traffic patterns were analyzed for the Project during the summer of 2020 at the height of the COVID-19 pandemic when traffic levels were substantially lower than they will be during Project operations. Based on current observed conditions and what is proposed under the Project, the northbound and southbound traffic on Soto Street and Santa Fe Avenue will worsen, and the already slow traffic on the local eastbound and westbound streets would almost certainly come to a standstill. IND 105-12

I anticipate that both our customers and our suppliers will come to prefer our competitors outside of Vernon due to the traffic delays that will inevitably result from the Project.

Noise and Vibration

The Draft EIS/SEIR also did not sufficiently study noise and vibration issues. My building is particularly susceptible to the harmful effects of noise and vibration. Already my building has had numerous glass windowpanes crack due to the noise and vibrations resulting from heavier trucks passing by the property. This issue would certainly worsen with rail traffic passing along the property, and I fear that even more detrimental structural damage could result. The Draft EIS/SEIR erroneously concludes that "[n]o noise sensitive land uses are located within 1,000 feet of the proposed Malabar Yard rail line along 46th Street". (Draft EIS/SEIR, p. 3.16-40.) My property is a noise sensitive land use. IND 105-13

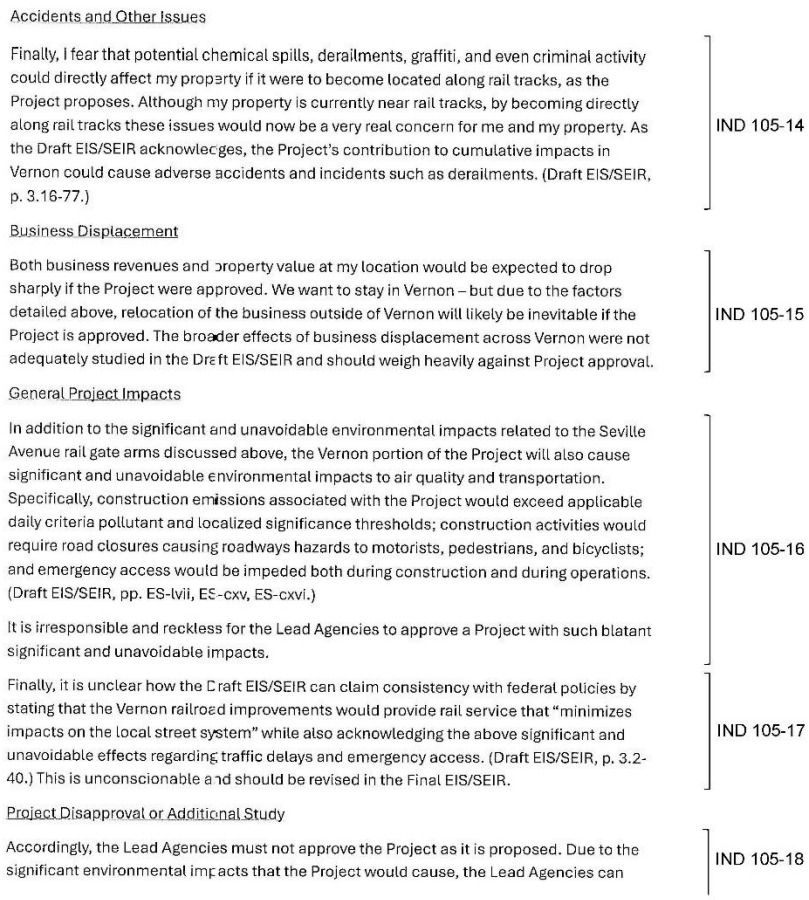
**IND 105-11** As discussed in the Final EIS Appendix Q, Page 3.3-41, all traffic study area roadway segments, including Roadway Segment #11 (Seville Avenue between Fruitland Avenue and Vernon Avenue), see Table 3.3-1, would operate at LOS D or better, which is below the criteria that would trigger an adverse effect (see Table 3.3-7). Only one roadway segment, Roadway Segment #4 Fruitland Avenue between Santa Fe Avenue and Pacific Boulevard would exceed the v/c ratio threshold during the Future Horizon Year (2040) in the PM peak hour and is considered a direct adverse effect. However, with implementation of Malabar Yard Mitigation Measure TR-5, no direct adverse effect would occur. Therefore, under any combination of design options improvements no adverse effect related to traffic delay would occur.

Please also refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. Key Issue Response #2 notes that a new railroad crossing at the intersection of Seville Avenue and 46th Street could cause southbound vehicular traffic to extend across 46th Street. While blocking an intersection is not a legal vehicular maneuver and queuing is not an LOS related traffic impact that constitutes a significant impact/adverse effect under CEQA/NEPA, the increase in queue at this location may introduce a potential roadway

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| | | hazard. Malabar Yard Mitigation Measure TR-6 minimizes the potential roadway hazard as effectively as possible because it requires roadway design, railroad safety devices, and accessibility to be coordinated with the City of Vernon and CPUC. Potential roadway safety devices that may be considered for future implementation (Malabar Yard Mitigation Measure TR-6) include queue cutter traffic signals or pre-signals for the new railroad crossing on Seville Avenue.<br><br>Key Issue Response #2 also includes clarification to the information presented in the Draft EIS/SEIR related to length of trains which are 3,000 feet in the existing and proposed condition. |
| | **IND 105-12** | Please refer to Comment IND 105-11 response and Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. Key Issue Response #2 provides a discussion of how the traffic methodology was coordinated with the City of Vernon prior to conducting the traffic analysis. The traffic volumes presented in the Draft EIS/SEIR Appendix Q represent the baseline condition at the time the environmental evaluation commenced and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes.<br><br>Roadway Segment #1 (Santa Fe Avenue between 49th Street and Fruitland Avenue) |

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| | | and Roadway Segment #9 (Soto Street between Fruitland Avenue and Vernon Avenue) were considered in the environmental evaluation, and no adverse effects on the roadways would occur from the redistributed traffic caused by the Malabar Yard railroad improvements.<br><br>As discussed in Key Issue Response #2, to address the impacts related to traffic delay that would occur at three intersections and one roadway segment (Fruitland Avenue), Malabar Yard Mitigation Measures TR-1 through TR-5 are proposed to maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. With access to and from the commenter's property being maintained, it would be speculative to determine reasons why the commenter's clients would decide to use other suppliers, should that occur. |
| | **IND 105-13** | Draft EIS/SEIR Appendix Q, Section 3.6 provides a focused noise and vibration analysis of the Malabar Yard railroad improvements. The commentor claims there is an insufficiency; however, no additional details that indicate how the building at the commenter's property would be considered a noise or vibration-sensitive land use is provided. The definitions of noise and vibration sensitive land uses are from the FTA Transit Noise and Vibration Impact Assessment Manual (FTA 2018).<br><br>For noise and vibration analysis, the screening distances (Section 4.3 of the FTA Transit Noise and Vibration Impact Assessment Manual, FTA 2018) were |

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| | calculated from the project footprint (maximum extent of design options considered) where changes to infrastructure would occur. This was disclosed in the Draft EIS/SEIR as part of the noise and vibration methodology which identified a 1,000 foot buffer from the proposed Malabar Yard rail line along the 46th Street and 49th Street intersection with Malabar Yard (without obstructions) or within 650 feet from the proposed Malabar Yard rail line along the 46th Street and 49th Street intersection with Malabar Yard (with obstructions) (refer to Draft EIS/SEIR Appendix Q Section 3.6, Figure 3.6-1). This screening assessment was performed, and, per the FTA and FRA guidelines, no noise sensitive land uses (including the commenter's property) are located within 1,000 feet of the project footprint (without obstructions) or within 650 feet of the project footprint (with obstructions) (refer to Figure 3.6 1 in Draft EIS/SEIR Appendix Q). Therefore, the Draft EIS/SEIR concluded the Malabar Yard railroad improvements would not cause adverse noise and vibration impacts. |



Accidents and Other Issues

Finally, I fear that potential chemical spills, derailments, graffiti, and even criminal activity could directly affect my property if it were to become located along rail tracks, as the Project proposes. Although my property is currently near rail tracks, by becoming directly along rail tracks these issues would now be a very real concern for me and my property. As the Draft EIS/SEIR acknowledges, the Project's contribution to cumulative impacts in Vernon could cause adverse accidents and incidents such as derailments. (Draft EIS/SEIR, p. 3.16-77.)

IND 105-14

Business Displacement

Both business revenues and property value at my location would be expected to drop sharply if the Project were approved. We want to stay in Vernon – but due to the factors detailed above, relocation of the business outside of Vernon will likely be inevitable if the Project is approved. The broader effects of business displacement across Vernon were not adequately studied in the Draft EIS/SEIR and should weigh heavily against Project approval.

IND 105-15

General Project Impacts

In addition to the significant and unavoidable environmental impacts related to the Seville Avenue rail gate arms discussed above, the Vernon portion of the Project will also cause significant and unavoidable environmental impacts to air quality and transportation. Specifically, construction emissions associated with the Project would exceed applicable daily criteria pollutant and localized significance thresholds; construction activities would require road closures causing roadways hazards to motorists, pedestrians, and bicyclists; and emergency access would be impeded both during construction and during operations. (Draft EIS/SEIR, pp. ES-lvii, ES-cxv, ES-cxvi.)

It is irresponsible and reckless for the Lead Agencies to approve a Project with such blatant significant and unavoidable impacts.

IND 105-16

Finally, it is unclear how the Draft EIS/SEIR can claim consistency with federal policies by stating that the Vernon railroad improvements would provide rail service that "minimizes impacts on the local street system" while also acknowledging the above significant and unavoidable effects regarding traffic delays and emergency access. (Draft EIS/SEIR, p. 3.2-40.) This is unconscionable and should be revised in the Final EIS/SEIR.

IND 105-17

Project Disapproval or Additional Study

Accordingly, the Lead Agencies must not approve the Project as it is proposed. Due to the significant environmental impacts that the Project would cause, the Lead Agencies can

IND 105-18

**IND 105-14** Please refer to the Comment AGE 3-65 response for a discussion on hazardous materials release in relation to Malabar Yard railroad improvements. As summarized in the Comment AGE 3-81 response, according to Draft EIS/SEIR Appendix Q Section 2, Table 2-1, fewer trains would be traveling along the Harbor Subdivision north of Malabar Yard. In consideration of the train movements shown on Table 2-2, the total daily frequency of trains using the north and east entrances would be reduced (net reduction of 3.15 trains per day). No change to the intensity of the Malabar Yard is proposed. The 46th Street Connector would be designed and constructed in accordance with applicable laws, polices, and regulations related to track safety. As discussed in Final EIS Appendix Q Section 3.14, Safety and Security, Page 3.14-24, the 46th Street Connector Design Option 1 and 2 would not increase potential for derailment due to the improvements being constructed per applicable code requirements and the grade and extent of proposed improvements. A cumulative effect was disclosed in Section 3.16 of the Draft EIS/SEIR only when combined with other rail projects with increased operations. In addition, the 46th Street Connector Design Option 1 and 2 is not expected to induce crime in the study area, which includes the commentor's property.

**IND 105-15** Please refer to Key Issue Response #5 for a discussion of operational and physical impacts to businesses. Displacement and relocation of the business at the

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| | | commenter's property is not expected to occur as access to the property could be maintained. In addition, with access to and from the commenter's property being maintained, it would be speculative to determine reasons why the commenter's business revenues or property values would decline, see Comment IND 105-11 response for additional information. |
| | **IND 105-16** | The Malabar Yard railroad improvements (separate from the Link US Project) would not cause air quality impacts that would be considered significant and unavoidable under CEQA. As indicated in Draft EIS/SEIR Chapter 7, Table 7-31, criteria pollutants would not exceed SCAQMD thresholds during construction or operations and air quality impacts associated with the Malabar Yard railroad improvements would be less than significant.<br><br>However, the analysis in the Draft EIS/SEIR acknowledges that the total emissions of the Combined Modified Proposed Project and Malabar Yard railroad improvements would exceed SCAQMD's daily criteria pollutant thresholds for NOx, $PM_{10}$, and $PM_{2.5}$. Table 7-5 in Chapter 7 of the Draft EIS/SEIR provides the combined total emissions from construction activities of the Modified Proposed Project (from Final EIR) and Malabar Yard railroad improvements. Although not required, Malabar Yard Mitigation Measures AQ-1 and AQ-2 are applicable because Malabar Yard railroad improvements would be constructed at the same time as construction of the Modified Proposed Project. |

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| | Regarding localized emissions, the Malabar Yard railroad improvements will decrease rail operation emissions, which offsets some vehicle idling emissions. On-site construction emissions at Malabar Yard were compared to SCAQMD localized significance threshold (LST) and were found to be below the thresholds for all criteria air pollutants (NOx, CO, $PM_{10}$, $PM_{2.5}$) (see Appendix F of the Final EIS Appendix Q). Appendix F of the Final EIS contains the LST supporting calculations for the Malabar Yard railroad improvements. Air quality impacts to sensitive receptors further away from the emission source would be less likely to be impacted than those identified through the localized analysis. Localized air pollutant emissions at Malabar Yard would not be considered a significant effect during both construction and operation and would not cause or contribute to an exceedance of an ambient air standard.<br><br>As detailed in the Key Issue Response #3, localized air quality impacts were evaluated using the localized significance threshold methodology from SCAQMD. This methodology sets a screening level threshold based on the pollutant ($NO_x$, CO, $PM_{10}$, $PM_{2.5}$) and the distance to the nearest air quality sensitive receptor in that source receptor area (location). On-site emissions are calculated and then compared to these thresholds. SCAQMD uses the localized significance threshold (LSTs) to evaluate if projects qualify to be screened out from the requirement to conduct project-specific dispersion modeling. If required, the purpose |

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| | of dispersion modeling is to demonstrate that a project would not delay attainment of ambient air standards. If a project's on-site emissions are below the LSTs, then no further analysis with dispersion modeling is required. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of an ambient air standard.<br><br>General Conformity is the pollution prevention and control program that requires a federal agency to assure any proposed activity the agency proposes will conform to the purpose of applicable implementation plans and will not interfere with a State or Tribe's ability to attain and maintain the National Ambient Air Quality Standards (NAAQS) for air quality, as required under Clean Air Act (CAA) section 176(c).<br><br>The purpose of the General Conformity rule is to ensure that:<br>• federal activities do not cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS);<br>• actions do not worsen existing violations of the NAAQS; and<br>• attainment of the NAAQS is not delayed.<br><br>As demonstrated in the Final EIS pages 3.5-26 to 3.5-34, RONA, and Appendix G of the Final EIS, the annual construction emissions and annual net change in operational emissions for all analysis years generated by the Build Alternative and Malabar Yard railroad improvements, as compared to the |

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| | No Action Alternative, are below the general conformity *de minimis* levels for all years of analysis with implementation of mitigation. As such a formal general conformity determination with additional localized analyses are not required. The Build Alternative and Malabar Yard railroad improvements would not interfere with the state's plans to attain and maintain the NAAQS. A detailed $PM_{10}$ and $PM_{2.5}$ hot-spot analysis was not completed because FCAA and 40 CFR 93.116 requirements would be met without an explicit hot-spot analysis.Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. Fewer train movements on the Harbor Subdivision equates to less vehicle idling. Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4.<br><br>Malabar Yard Mitigation Measure TR-1 requires a TMP to be prepared and implemented, clearly marked detours to be implemented, and advanced notice be provided to nearby residences, emergency |

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| | service providers, public transit and bus operators, the bicycle community, businesses, and organizers of special events. The TMP requires traffic flow to be maintained to the safest degree feasible and the City of Vernon to be notified in advance of street closures, detours, or temporary lane reductions. As discussed above in Comment 105-12 response, and Key Issue Response #2, to address the impacts related to traffic delay that would occur at three intersections and one roadway segment (Fruitland Avenue), Malabar Yard Mitigation Measures TR-1 through TR-5 are proposed to maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts.<br><br>Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements |

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| | | to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |
| | **IND 105-17** | The Malabar Yard railroad improvements would result in adverse and beneficial effects. The improvements are consistent with the Partnership for Sustainable Communities Livability Principles Principle 1, referenced in Draft EIS/SEIR Appendix Q Section 3.2, Page 3.2-40, because any combination of design options for the Malabar Yard railroad improvements would support implementation of the Build Alternative or Build Alternative Design Option that would provide more transportation choices. The Link US project will increase mobility through LAUS and accommodate more public transit riders in the future, and as |

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| | | part of the Build Alternative or Build Alternative Design Option, the Malabar Yard railroad improvements provide an additional method of moving railroad traffic that did not exist before. It would thereby expand the rail system while minimizing impacts on the existing local street system. As an example, Design Option 1 for the 46th Street Connector would minimize impacts on the local street system but would also result in an adverse effect associated with a roadway hazard at Seville Avenue and 46th Street. |
| | **IND 105-18** | The Draft EIS/SEIR does not tier off of the Final EIR (June 2019). The environmental review process under CEQA extended from 2016 at the issuance of the Notice Of Preparation to June 2019 when the Metro Board of Directors certified the Final EIR.<br><br>The NEPA EIS process is being completed by CHSRA and Metro to address the Build Alternative and Build Alternative Design Option and Malabar Yard railroad improvements.<br><br>Final SEIR is the CEQA Supplemental EIR. Section 7.6 provides a full environmental evaluation of the Malabar Yard railroad improvements in the City of Vernon for each of the environmental topic areas listed in Appendix G of the 2023 CEQA Guidelines. Draft EIS/SEIR Appendix Q was prepared to support the NEPA documentation for the Malabar Yard railroad improvements, and includes a full description of the regulatory framework, methods for evaluating effects, and the affected environment (synonymous with environmental setting for CEQA |

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| | purposes). To avoid duplication of information in the Draft EIS/SEIR, the information contained within Appendix Q of this EIS/SEIR was used to the maximum extent feasible to provide background and context for the CEQA evaluation of the Malabar Yard railroad improvements presented in Draft EIS/SEIR Section 7.6.<br><br>The environmental evaluation of the Malabar Yard railroad improvements commenced in 2020. To the extent that the commenter believes any of that data is out of date, it has not identified which data could qualify as out-of-date. |

and should refuse to certify the EIS and SEIR once it is finalized, assuming that the Project cannot sufficiently remedy the harms it would cause.

Alternatively, the Lead Agencies could require further environmental study. Specifically, the Draft EIS/SEIR tiers from the earlier Final Environmental Impact Report ("FEIR") certified by LA Metro in June 2019. The Notice of Preparation for the Project's original FEIR had been issued is April 2016 and the Draft Environmental Impact Report ("DEIR") was not released under January 2019, indicating that full environmental review of the Project occurred from 2016 to 2018.

The Draft EIS/SEIR is intended to tier off of the FEIR approved over five years ago. But during the intervening years since certification of the FEIR major changes have been made to the proposed Project including the addition of CHSRA as a lead agency as well as the addition of the Vernon component of the Project. The contemplated Malabar Yard improvements in and of themselves warrant the creation of a new full EIR, not a merely supplemental one that studies a small number of impact areas. In addition, the Final EIS/SEIR is not scheduled to be approved by the lead agencies until Spring of 2025 at the earliest, indicating that many Project components will not have been studied in as much as nine years. CEQA does not support such dated environmental review and it would be inappropriate to approve a merely supplemental EIR in this circumstance. If the Project is not wholly disapproved, the Lead Agencies should require further environmental study of the Project in the form of a wholly new EIR.

IND 105-18 Contd.

Very Truly Yours,

Dennis Berman

Division President -Bandwagon/WPS Fresh

4450 Seville Ave, Vernon, CA 90058

Majority Shareholder- Deleni Boys LLC. (Property Owner)

17026 Hartsook St., Encino, CA 91316

Cc:

Jerry Neuman, DLA Piper LLP US

Sean Becker, DLA Piper LLP US

**Comment Number:** IND 106

**Name:** Dana Runge

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern,

I am a volunteer with the LA Derby Dolls. My involvement with the league started in 2017 as a 48 year old newbie in the league's Derby por Vita adult fitness program. Although recent health problems are keeping from skating, I am very proud of my involvement with the league.

Repeatedly, I've seen nervous beginners find their passion, and strength. My own ability and confidence was greatly enhanced from my own skating with the league, but also several beginners that I've helped with their equipment, now compete with other teams in our regularly-scheduled competitions.

Every game that I attend or volunteer for, I'm overwhelmed with pride watching the amazing performances of friends of mine who started as timid newbies.

IND 106-1

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging Metro to consider in its report the impacts of the proposed 46th StreetConnector on our community recreational athletics organization and its public events.

We rely on our community recreational athletics facility at 2661 E 46th St to run programming 7 days a week. I am concerned about the disruption to our programming during the construction period as well as noise, safety and traffic concerns when the rail line is up and running upon completion.

Thanks in advance for considering our feedback,

Dana Runge

[redacted]

[redacted]

## IND 106 Dana Runge

**IND 106-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 107

**Name:** Harper McCallie

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern,

I am an athlete with the LA Derby Dolls.

I have skated with the league for 5 years and practice 2-3 days per week and play weekly scrimmages and volunteer at our monthly games.

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging the Metro to consider in its report the impacts of the proposed 46th Street Connector on our community recreational athletics organization and its public events. IND 107-1

We rely on our community recreational athletics facility at 2661 E 46th St to run programming 7 days a week. I am concerned about the disruption to our programming during the construction period as well as noise, safety and traffic concerns when the rail line is up and running upon completion.

Thanks in advance for considering our feedback,

Harper McCallie

[redacted]

[redacted]

## IND 107 Harper McCallie

**IND 107-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 108

**Name:** Tami Van Ert

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern,

I am an athlete with the LA Derby Dolls. I have skated with the league for 2 years and practice 2-3 days per week and play weekly scrimmages and volunteer at our monthly games.

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging Metro to consider in its report the impacts of the proposed 46th StreetConnector on our community recreational athletics organization and its public events. IND 108-1

We rely on our community recreational athletics facility at 2661 E 46th St to run programming 7 days a week. I am concerned about the disruption to our programming during the construction period as well as noise, safety and traffic concerns when the rail line is up and running upon completion.

Thanks in advance for considering our feedback.

Tami Van Ert

[redacted]

## IND 108 Tami Van Ert

**IND 108-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 109

**Name:** Brianne Klugiewicz

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern,

I am a member of the Los Angeles Derby Dolls, a non-profit organization dedicated to empowering people / community through the sport of roller derby. I have actively skated with the Derby Dolls for eleven years. I am also a trainer teaching our home team, fresh meat and juniors programs.

I am writing in support of the letter submitted by our Board of Directors President Amy Ganvoort urging Metro to consider in its report the impacts of the proposed 46th Street Connector on our community recreational athletics organization and its public events.

Our facility, located at 2661 E 46th St., hosts classes and events nearly seven days a week. Not only would construction work on your proposed plan vastly affect our classes and events, but the location of the proposed connection would hinder our means of financing our organization - which entails hosting public games, the proceeds of which pay for our rent and facility upkeep. IND 109-1

As noted in our letter from the BOD, this organization has partnered with the community of Vernon to offer programming and events to the City of Vernon. After having been displaced many times throughout Los Angeles, it has been a relief to find a welcoming partnership with Vernon and its community and we hope to continue that relationship. However, this proposal is a direct impediment to that and puts us at risk of losing our home and a much appreciated support system to keep us skating.

Thanks in advance for considering our feedback,

Brianne Klugiewicz (aka. Hannah Barbarian)

Trainer / Tracker / Scream Queen / DDX All-Star

LA Derby Dolls

[redacted]

## IND 109 Brianne Klugiewicz

**IND 109-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this Final EIS as “ORG 7” (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 110

**Name:** Michele Florman

**Date Received:** 08/09/24

**Format Received:** Email

Above ground metro train lines are unacceptable short cuts for the County of LA. Metro wants to provide service which they can not even provide Bus safety throughout LA. Citizens will refuse to utilize Metro's trains and buses as they are havens for crime and completely unsafe to travel, it is not like the train services in Europe not even close. IND 110-1

Metro refuses to provide all trains underground due to expense but will chop our cities up, cause more traffic, pollution and an eyesore looking at the trains slicing the cities up and blocking accessibility through the streets.

Major concerns: Noise, excessive vibrations, air quality, community disruptions for many years with non-stop construction blocking of streets, safety and a public eyesore for above ground rails that attract homeless drug addicts. Metro has proven not to be safe. I had to walk an elderly woman past shelterless drug addicts so she could access her home from a metro bus stop. That's not safety in the city Metro can't even get its bus service to be safe and clean. We don't feel safe taking Metro anywhere, too many crimes. Friends were excited when the train went to Santa Monica until they got on the train and were threatened and intimidated. IND 110-2

Metro seeks to block streets, access to businesses, create more traffic, prevent emergency transport, create an above ground eyesore in already ugly streets slicing up the streets and access. What a mishmash of activity and dangerous to pedestrians and drivers. Only below ground trains in busy areas.

## IND 110 Michele Florman

**IND 110-1** Please refer to the Comment IND 76-1 response for a discussion on the *Link US Threat and Vulnerability Assessment*. As discussed in the response, with the incorporation of design elements that maximize security in conjunction with the amending of Metro's existing safety and security plan to accommodate the proposed concourse related improvements, no direct adverse effect would occur during operation

**IND 110-2** Please refer to the Comment IND 76-2, 76-3, and 76-4 responses for explanations related to traffic, air quality, community disruption, safety and aesthetics.

CONCLUSION:

The proposed plan to CONNECT MORE THAN HALF CENTURY OLD RAIL SPURS BY LAYING ADDITIONAL RAIL TRACK ALONG 46th STREET CONVERTING SPURS TO "PASS THROUGH" TRACKS POSES A CLEAR AND PRESENT DANGER TO INDIVIDUALS AND AN UNNECESSARY INCONVENIENCE TO PERSONS TRAVELING, WORKING AND LIVING WITHIN AND BEYOND THE VERNON COMMUNITY. It is my belief that any reasonable judge would agree that the MTA traffic study is flawed and biased and that the MTA traffic engineers SHOUD not in good faith rely on and utilize half century old traffic data and spur usage data to complete their traffic / safety analysis. It is clear that the MTA must repeat the Traffic / Safety Analysis utilizing current and relevant data prior to proceeding with this project.

IND 110-2
Contd.

Sincerely,

Michele Florman

**Comment Number:** IND 111

**Name:** Diego Effio

**Date Received:** 08/09/24

**Format Received:** Email

Hello,

I am a resident of LA County, and someone who has used Union Station a lot as a transportation hub for many of my journeys around California. I fully support the current plan to expand Union Station and create all the run-through tracks that it needs in preparation for the future of LA where most of us travel by rail. Ignore the voices of those who try to impede on progress, such as the City of Vernon. Please get to breaking ground soon. Thank you. IND 111-1

-Diego Effio

[redacted]

## IND 111 Diego Effio

**IND 111-1** The commenter's support for the Project is noted.

**Comment Number:** IND 112

**Name:** Jeremy Stutes

**Date Received:** 08/09/24

**Format Received:** Email

I'm concerned about the multi-stage process for construction and that the project has morphed so much from the original vision.

I submitted these questions to the e-mail address on file and received no reply from your staff. — IND 112-1

During the first phase of construction, will the two tracks over the freeway be bidirectional? — IND 112-2

Which of the tracks being added will service high-speed rail? — IND 112-3

Will the bridge over the freeway be built to accommodate all of the additional tracks in the full build-out? — IND 112-4

Is the plan to come back again with construction crews and close the bridge when adding the additional tracks? — IND 112-5

What will the impacts of phase two construction be on operations at Union Station in terms of rail access and how long will those impacts last? — IND 112-6

How will the maxim capacity, directional access, and public benefits of operations be different under phase 1 and phase 2? — IND 112-7

Will construction stop between phases and if so what are the additional costs of rehiring and training construction workers? — IND 112-8

Additionally, how can the project phases be consolidated with other projects on Metro's horizon like electrification of rail corridors so that Union Station can be future-ready and future service interruptions can be minimized as much as possible. — IND 112-9

## IND 112 Jeremy Stutes

**IND 112-1** The Project has not morphed from the original vision and includes the same major Project elements (lead tracks north of LAUS, elevated rail yard and concourse, and run-through tracks south of LAUS) that were part of the Link US Final EIR (certified June 2019). Please refer to the Comment ORG-5 response (The Transit Coalition).

**IND 112-2** Please refer to the Comment ORG-5-2 response.

**IND 112-3** Please refer to the Comment ORG-5-3 response.

**IND 112-4** Please refer to the Comment ORG-5-4 response.

**IND 112-5** Please refer to the Comment ORG-5-5 response.

**IND 112-6** Please refer to the Comment ORG-5-6 response.

**IND 112-7** Please refer to the Comment ORG-5-7 response.

**IND 112-8** Please refer to the Comment ORG-5-8 response.

**IND 112-9** The Draft EIS/SEIR Chapter 3.16, Table 3.16-2 includes a list of projects of past, present, and reasonably foreseeable future actions in the cumulative geographic area. The Build Alternative and Build Alternative Design Option does not preclude future

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| | overhead catenaries to support electrified trains through the Project limits because operators are currently using diesel trains nor would it preclude other projects from being constructed at the same. It should be noted that coordination with other developers would be necessary should construction activities with other projects occur. Metrolink, Amtrak, and CHSRA as the rail operators through LAUS, would be responsible for the purchase and operation of electrified trains that move through Project limits. |

**Comment Number:** IND 113

**Name:** Joseph Cohen May

**Date Received:** 08/09/24

**Format Received:** Email

I strongly support the build alternative with a few comments/suggested modifications: IND 113-1

1) Support for catenary wires should be built on all tracks. California has a mandate to electrify all rail, and providing catenary support will ensure that all options for electrifying all lines are feasible

2) Care should be taken to ensure that geometry modifications to The 101 and local streets to not make pedestrian access more difficult. Current road designs to not provide adequate pedestrian safety, and this should be a priority if road geometry is getting modified for this project. IND 113-2

Any changes to transportation routes that increase congestion will diminish the attractiveness of Vernon as a business hub, potentially resulting in job losses and a decline in the local economy. We strongly recommend that Metro re-conduct its studies to reflect post-COVID business patterns, ensuring a comprehensive understanding of the adverse impacts that will extend beyond the streets of 46th and 49th, as the EIS/SEIR currently suggests. IND 113-3

## IND 113 Joseph Cohen May

**IND 113-1** The Build Alternative or Build Alternative Design Option does not preclude future overhead catenaries to support electrified trains through the Project limits because operators are currently using diesel trains. It should be noted that Metrolink, Amtrak, and CHSRA, as the rail operators through LAUS, would be responsible for the purchase and operation of electrified trains that move through the Project limits.

**IND 113-2** Roadway improvements to US-101 and local roadways would be designed, constructed, and coordinated to meet Caltrans and the City of Los Angeles or City of Vernon standards and requirements for pedestrian safety, as deemed applicable. Mitigation Measure LU-1 (described in Section 3.2, Land Use and Planning) requires new bike lanes on Commercial Street and is proposed to improve non-motorized connectivity between LAUS and neighborhoods surrounding LAUS. Implementation of Mitigation Measure LU-1 would minimize potential impacts on bicycle and pedestrian connectivity between LAUS and neighborhoods surrounding LAUS. As depicted in Draft EIS/SEIR Section 2, Figure 2-26, at the intersection of Center Street and Commercial Street, new sidewalks, bike lanes, and pedestrian safety/ADA features would be implemented as part of the Build Alternative or Build Alternative Design Option. At North Main Street, Metro will continue to coordinate with the City of Los Angeles as the design process advances to

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| | | maximize safety at the North Main Street railroad crossing while not precluding future active transportation improvements that the City of Los Angeles may elect to implement. |
| | **IND 113-3** | Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential queuing associated with implementation of Malabar Yard railroad improvements. The Malabar Yard railroad improvements would not generate new traffic but would redistribute existing traffic on local roadways. As stated in Key Issue Response #2, implementation of Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. Therefore, the Project would not worsen LOS and traffic conditions would be maintained or improved.<br><br>*Economic and Fiscal Impact Response* - An analysis of economic and fiscal impacts on local and regional economies that would result from implementation of the Malabar Yard railroad improvements can be found in Draft EIS/SEIR Appendix Q, Section 3.13, Economic and Fiscal Impacts. As demonstrated in Section 3.13 of Appendix Q, a balanced analysis was performed to determine the conclusions presented in the Draft EIS/SEIR based on the local and regional impacts from short term construction spending, as well as long term impacts related to potential job displacement and lost property tax revenues due to the required ROW acquisitions. |

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| | Please refer to the Comment AGE 3-73 response for a discussion of the construction expenditures, potential job displacement and lost property tax revenues. |

**Comment Number:** IND 114

**Name:** Chavis Ferguson

**Date Received:** 08/09/24

**Format Received:** Email

Dear Mr. Montez, Coast Packing Company would like to provide the following comments in response to the Draft Environmental Impact Statement (EIS) and Supplemental Environmental Impact Report (SEIR) for the Los Angeles County Metropolitan Transportation Authority (Metro) Link US Project, specifically regarding the expansion of rail tracks around the BNSF Railway Malabar Yard in the City of Vernon.

The proposed expansion at Malabar Yard does not solely impact 46th and 49th Streets or the traffic patterns within a one-mile radius of the area. The EIS/SEIR fails to consider that the expanded train route will extend eastward, resulting in increased rail traffic that will pass directly by our plant on Downey Avenue. We are deeply concerned that this increase in BNSF train traffic will exacerbate congestion on streets near our business on Vernon and Downey Avenues, potentially leading to significant delays in our product shipments. During previous public meetings, Metro indicated that train traffic would be minimal. However, the EIS/SEIR outlines the potential for up to 60 connected rail cars—spanning 4,000 feet—traveling east and west through the streets of Vernon. Specifically, on Page 2-4 of the document, under "North Entrance," it states: "The foreseeable length of future trains operating on the 46th Street Connector could range from 2,000 feet to 4,000 feet. To serve customers on the existing spur line track east of Pacific Boulevard and south of 46th Street, the Pacific Boulevard and Vernon Avenue at-grade crossings could be occupied for 'head-end moves' as necessary to facilitate continued freight operations on the existing spur line." By blocking 49th Street and expanding rail on 46th Street, this continuous line of approximately 60 rail cars will severely congest the following streets, which are not adequately addressed in the EIS/SEIR:

IND 114-1

Pacific Boulevard Eastbound traffic on 46th Street Seville Avenue Soto Street 44th Street Boyle Avenue Alcoa Avenue South Downey Road

As these lengthy trains travel from the Malabar Yard to the LA Junction, they will effectively cut off traffic in all directions across much of the city for extended periods. Adding turning lanes will not mitigate the impact on emergency response times, nor will it address the extended idling time for vehicles, which

## IND 114 Chavis Ferguson

**IND 114-1** Metro appreciates the comments provided regarding the data and analysis in the Draft EIS/SEIR. The responses below address the comments related to the localized traffic analysis conducted and the intersections and roadway segments considered, mitigation measures to reduce Project-related traffic delays, freight railroad operations, community connectivity, life safety and emergency response:

- Localized Traffic Analysis Conducted /Intersections and Roadway Segments Considered - The Draft EIS/SEIR includes a thorough and comprehensive evaluation of potential adverse effects from implementation of the Malabar Yard railroad improvements, including traffic and transportation effects associated with railroad operations. The anticipated traffic redistribution and change in traffic along with the list of study intersections and roadway segments patterns was coordinated with the City of Vernon to obtain feedback on the approach before the traffic analysis was performed.

  As discussed in Key Issue Response #2, due to the Project related redistribution of existing traffic, a localized traffic analysis was conducted for intersections and roadway segments within proximity to the Malabar Yard railroad improvements where traffic redistribution is expected to occur. The traffic study area is shown in Draft EIS/SEIR

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| | Appendix Q Section 3.3.3, Figure 3.3-1, and demonstrates that traffic impacts at 46th Street, Seville Avenue, and Soto Street were all considered to determine if the Malabar Yard railroad improvements would increase traffic delay to a level that would exceed applicable v/c ratio thresholds.<br><br>As discussed in Key Issue Response #2, the traffic study area does not include intersections or roadway segments between Soto Street and the Los Angeles Junction because the Malabar Yard railroad improvements would not generate new traffic trips and would only result in localized redistribution of existing traffic (Final EIS Appendix Q Section 3.3, Page 3.3-9). Trains currently operate across Pacific Boulevard/Vernon Avenue, Pacific boulevard and 46th Street, Seville Avenue, Soto Street, 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road. No operational changes along the East Seville Connection and Hobart Yard/ Los Angeles Junction Connection routes would be attributable to the proposed Malabar Yard railroad improvements; therefore, traffic analysis was not conducted at those corresponding intersections.<br><br>For 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road, the four additional train movements that would pass these intersections for BNSF to serve customers on the west side of the City of Vernon (Exxon and West |

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| | Seville), two movements would occur at night (7:30pm to 2:00am) and two movements would occur during the day (6:30am to 2:00pm). Based on the queuing analysis performed and in response to property owner questions raised in January 2025, Metro conducted a calculation to determine the percentage of time in a 24-hour period that the four additional train movements per day (and the two existing trains movements) may block access to a driveway on 46th Street, which can also be used to demonstrate the overall percentage of time trains may block an intersection along the East Seville Connection from Soto Street to the Los Angeles Junction where a detailed traffic evaluation was not conducted (44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road). The calculation assumes 6 train movements per day, with a 3,000-foot train plus 500 feet on either end for gate activation and clearing, traveling at 10 miles per hour, and demonstrates that trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Based on consideration of context and intensity, no adverse effect would occur related to traffic delay at the railroad crossing intersections from Soto Street to Los Angeles Junction where 44th Street, Boyle Avenue, Alcoa Avenue, and South Downey Road are located. |

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| | While Metro recognizes BNSF would operate trains outside the traffic study area, the existing and future operational scenarios included in the environmental evaluation were focused to the geographic areas where physical modifications to infrastructure improvements or new infrastructure would occur. Indirect impacts were also analyzed per the requirements of 40 C.F.R. 1508.8(b) and CEQA Guidelines Section 15358 since indirect impacts, or secondary impacts, are impacts caused by a project that occur later in time or are farther removed in distance but are still reasonably foreseeable.<br><br>As presented in the Final EIS Appendix Q Section 3.3, Page 3.3-10 and in Key Issue Response #2, a queuing analysis was prepared at six locations in response to stakeholder engagement activities to determine whether the existing travel lane storage capacity is adequate to accommodate the queue formations generated from redistributed traffic. The results of the queuing analysis demonstrate for the Opening Year (2024), no increase to the queue formation would be attributable to the Malabar Yard railroad improvements with exception of northbound through movements at Railroad Crossing #4 where there is 20 feet of incremental addition to the existing queuing that already occurs. The increase in queue formation is not considered a substantial change for two main reasons: 1) the |

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| | additional 20 feet of queue formation translates into less than a vehicle of queue since one vehicle queue is 25 feet; and 2) because the added queue can be adequately accommodated with the current configuration of the roadway and it would take only one cycle of phasing to clear out the additional 20 feet of incremental addition to the existing queuing that already occurs without the need for any further improvements in lane configuration. At Railroad Crossing #6 (Downey Road south of Vernon Avenue), the queue formation already exceeds the storage capacity in the existing condition (Table 3.3-10) and would continue to exceed the storage capacity during the 2024 No-Build scenario. The queue formation on Downey Road south of Vernon Avenue in the northbound through and southbound through direction remains the same during AM and PM peak hours.<br><br>With the Malabar Yard railroad improvements, 3.15 fewer trains would operate in the City and half of the train movements would occur at night, which have very little to no impact on traffic. For trains operating during the day, if a train movement occurs during the AM and PM peak periods, there could be some effect, but trains are not anticipated to operate at the same time every day and are not all occurring during the AM or PM peak periods. The hourly schedule to service Vernon customers fluctuates and is variable throughout the week based on customer demand. |

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| | In March 2025, Metro facilitated a Community Meeting/Open House in the City of Vernon. Multiple comments were raised by the community regarding the duration of time that intersections could be blocked by freight trains. In response to these comments, in April 2025 Metro installed cameras at multiple locations throughout the City to record continuous train activity over the course of a week (April 19–25, 2025), 24-hours per day.<br><br>Applying the video footage collected, Metro performed an intersection delay/blockage analysis to document intersection delay/blockage which would occur in the existing condition and with implementation of the Malabar Yard railroad improvements. Metro presented the results of the intersection delay/blockage analysis on June 17, 2025, to the Vernon City Council and on June 23, 2025, to the Vernon Chamber of Commerce. Multiple property owners and business representatives attended both meetings.<br><br>Based on the video data collected, results were summarized for two conditions (Actual Condition [based on observed train activity] and Worst-Case Condition) to determine how the Malabar Yard railroad improvements would change intersection delay/blockage at eight locations and effects to citywide vehicular circulation. Results are summarized below: |

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| | 1. Actual Condition (based on observed train activity)<br><br>a. Length of Observed Trains: 350 feet to 1,500 feet<br><br>b. Daily Intersection Blockage Results: With Malabar Yard railroad improvements, daily intersection delay/blockage would be reduced by 30 minutes.<br><br>2. Worst Case Condition<br><br>a. Length of Longest Potential Trains: 3,000 feet<br><br>b. Daily Intersection Blockage Results: If longer trains are needed due to customer demand in the City of Vernon, the corresponding reduction in daily intersection blockage with the Malabar Yard railroad improvements would also increase as compared to the existing condition. Assuming 3,000-foot trains would operate on any given day, daily intersection delay/blockage would be reduced by over 1 hour and 20 minutes. This reduction is based on the assumption that in the existing condition trains would operate with the same length (3,000 feet) without the Malabar Yard railroad improvements. |

Based on the train observations conducted in April 2025, the data supports the conclusion that with implementation of the Malabar Yard railroad improvements, a citywide circulation improvement would occur. This is primarily because:

1. 3.15 fewer trains would operate in the City of Vernon, and

2. In the current condition, BNSF's "train building" activities occur on City streets north of Malabar Yard (Pacific Avenue), which triggers a substantial amount of time when railroad gates are down, delaying/blocking vehicular traffic. With the implementation of the Malabar Yard railroad improvements, most train building activities will be relocated to BNSF's Los Angeles Junction (LAJ) rail yard on the east side of the City.

- Mitigation Measures to Reduce Project-Related Traffic Delays - Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. As such, the Malabar Yard railroad improvements would not exacerbate congestion on streets in Vernon, including Vernon Avenue and Downey Avenue or contribute to delays in product shipments. Malabar Yard Mitigation Measures TR-2 through TR-5 were modeled to verify that the proposed

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| | mitigation measures would fully mitigate the adverse effect related to traffic delay. Malabar Yard Mitigation Measure TR-6 could not be included in the traffic model since there is no metric to determine the level of effectiveness after coordination with CPUC and the City occurs.<br><br>• Freight Railroad Operations - Key Issue Response #2 includes clarifications to the information presented in the Draft EIS/SEIR Appendix Q Section 2 regarding freight railroad operations. All of the information and analysis of typical freight railroad operational patterns, and the conclusions in the Draft EIS/SEIR are based on a combination of historical data, stakeholder input, and expert analysis. The information collected from BNSF as it relates to the affected train routes, train lengths, consolidated freight operations, and reduced train frequencies is summarized in Key Issue Response #2. As shown in Table 2 of Key Issue response #2, 8 daily train movements occur on the affected routes considered (Figure 7), and in the future condition, a total of 4.85 daily train movements would occur on these same affected routes (Figure 8). As shown in Table 2, the total daily frequency of train movements in the City of Vernon (Net Change) is reduced by 3.15 train movements per day and half of the train movements would occur at night. Figures 7 and 8 depict the existing and future daily train movements on the affected routes. |

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| | • Community Connectivity - The BNSF Harbor Subdivision has provided service to local customers since it was constructed in the 1880s, even earlier than the incorporation of the City of Vernon. Prior to the opening on the Alameda Corridor in 2002 the Subdivision also provided connectivity between the local ports and national railroad networks. See Draft EIS/SEIR Appendix Q Section 1, Figure 1-2 for the location of the Harbor Subdivision. The Harbor Subdivision is also shown in Volume III, Introduction on Figure 7 and 8. In the 1920s the Los Angeles Junction Railway was constructed increasing connectivity and service to local customers. Through the present day numerous local commercial and industrial businesses in the City of Vernon utilize freight rail services to ship goods in and out of their businesses.<br><br>The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from Los Angeles Junction. Daily train movements on the Harbor Subdivision would be reduced from 4 existing daily train movements to 0.85 daily train movements (see Key Issue Response #2, Table 2 and Figures 7 and 8). Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent fewer train movements on the Harbor Subdivision. |

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| | In consideration of the train movements shown in Key Issue Response #2, Table 2 and Figures 7 and 8, the total daily frequency of trains throughout the City of Vernon would be reduced (net reduction of 3.15 trains per day). Fewer train movements on the Harbor Subdivision would increase opportunities for enhanced community connectivity.<br><br>As discussed above, in response to inquiries related to queuing and traffic congestion at the railroad crossings from Soto Street to Los Angeles Junction, a calculation was performed that demonstrates trains would block a driveway (or an intersection) approximately 2 percent of the day and half of all trains would operate during the night (7:30pm to 2:00am). Considering the heavy presence of existing freight trains operating in the City already, reduced train frequencies that would be facilitated by the Malabar Yard railroad improvements, and the duration of the day trains would operate between Malabar Yard and Los Angeles Junction, no adverse effect related to division of communities or reduced community connectivity would occur.<br><br>• Life Safety and Emergency Response - Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were |

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| | evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no |

changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers.

- Vehicle Idling and Local Air Pollution - Please refer to Key Issue Response #3 for a discussion related to the sensitive receptors considered in the air quality analysis performed for potential impacts related to vehicle idling and reduced train movements associated with the Malabar Yard railroad improvements. Construction or operation of the Malabar Yard railroad improvements is not expected to result in extended idling time for trucks or vehicles. The proposed Malabar Yard railroad improvements would result in the consolidation of local freight rail service so that all BNSF customers in the city are served from the Los Angeles Junction. In the existing condition, BNSF customers in the City of Vernon are served from two locations, Malabar Yard and Los Angeles Junction. The consolidated freight operations would reduce daily train movements on the Harbor Subdivision railroad tracks leading in and out of Malabar Yard. Since all Vernon customers would be served in the future from the same origin point (Los Angeles Junction), the consolidated train movement would result in 78 percent less train movements on the Harbor Subdivision coming from/to the San Bernardino Subdivision. Thus, fewer train movements on the Harbor Subdivision equates to less vehicle idling at each of the at-grade crossings where sensitive receptors are located. Because

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| | implementation of the 46th Street Connector would shift freight rail activity away from sensitive receptors, vehicle idling at Malabar Yard would be so minimal it would not cause a violation of any air quality standard.<br><br>General Conformity is the pollution prevention and control program that requires a federal agency to assure any proposed activity the agency proposes will conform to the purpose of applicable implementation plans and will not interfere with a State or Tribe's ability to attain and maintain the National Ambient Air Quality Standards (NAAQS) for air quality, as required under Clean Air Act (CAA) section 176(c).<br><br>The purpose of the General Conformity rule is to ensure that:<br><br>o federal activities do not cause or contribute to new violations of National Ambient Air Quality Standards (NAAQS);<br><br>o actions do not worsen existing violations of the NAAQS; and<br><br>o attainment of the NAAQS is not delayed.<br><br>As demonstrated in the Final EIS pages 3.5-26 to 3.5-34, RONA, and Appendix G of the Final EIS, the annual construction emissions and annual net change in operational emissions for all analysis years generated by the Build Alternative and Malabar Yard railroad improvements, as compared to the No Action Alternative, are below the general |

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| | conformity *de minimis* levels for all years of analysis with implementation of mitigation. As such a formal general conformity determination with additional localized analyses are not required. The Build Alternative and Malabar Yard railroad improvements would not interfere with the state's plans to attain and maintain the NAAQS. A detailed $PM_{10}$ and $PM_{2.5}$ hot-spot analysis was not completed because FCAA and 40 CFR 93.116 requirements would be met without an explicit hot-spot analysis.<br><br>Benefits from operation of Malabar Yard railroad improvements include reduced intermodal railcar miles of travel, resulting in reduced fuel consumption by rail and associated rail emissions. The long-term, regionwide reduction in emissions is a beneficial effect disclosed in the Draft EIS/SEIR Appendix Q Section 3.5, Section 3.5.4.<br><br>Metro is committed to continuing the ongoing coordination with BNSF, the City of Vernon, and affected stakeholders to minimize potential impacts associated with the Malabar Yard railroad improvements during construction and operation and develop solutions that preserve the city's economic vitality and connectivity to the extent feasible. |

will worsen local air pollution. The streets with rail crossings are not the only ones affected; northbound and southbound traffic along Santa Fe Avenue will also experience significant delays as vehicles queue at the rail crossings. The trains will continue to cross major thoroughfares like Soto Street, Boyle Avenue, Alcoa Avenue, and Downey Road, resulting in substantial disruption to everyone living, working, and driving through the city. The proposed traffic mitigation measures have not been adequately modeled and are likely to be insufficient. We already experience delays due to crossing restrictions or scheduling conflicts with BNSF. When we're unable to cross their tracks in a timely manner, it creates significant bottlenecks and disrupts our operations. Understanding how BNSF plans to address these crossing issues or coordinate with Union Pacific (UP) to minimize disruptions would be highly valuable. Such information would help us better anticipate and prepare for potential delays.

IND 114-1 Contd.

Additionally, we are concerned about the impact of increased truck traffic. Rail congestion typically leads to a rise in truck volume and truck related slow downs, which will further worsen congestion in our city and exacerbate logistical challenges for local businesses.

We would also like to emphasize that the traffic and goods movement studies conducted by Metro were performed during the pandemic, a time when many Vernon businesses were shuttered or operating at reduced capacity. These studies should be thoroughly reviewed and reevaluated, given that Vernon's industrial sector contributes significantly to the Southern California economy, with an output of $6.5 billion. Any changes to transportation routes that increase congestion will diminish the attractiveness of Vernon as a business hub, potentially resulting in job losses and a decline in the local economy. We strongly recommend that Metro re-conduct its studies to reflect post-COVID business patterns, ensuring a comprehensive understanding of the adverse impacts that will extend beyond the streets of 46th and 49th, as the EIS/SEIR currently suggests. Thank you for considering our comments. We look forward to your response and any further discussions on this matter.

IND 114-2

Coast Packing Company is a fourth-generation, family-owned business located in Vernon, California. Founded in 1922, Coast has 102 years of business experience as an integral part of the meat packing and processing industry. Coast focuses on the rendering and refining of edible fats and oils to produce lard, beef tallow, animal-vegetable blends, and vegetable-based shortenings and oils. In addition, Coast also produces beef tissue from its edible rending production that can be used in various food and pet food applications. Thank you for your attention to this matter. Chavis

IND 114-3

**IND 114-2** As discussed in Key Issue Response #2, a COVID factor was used to estimated traffic conditions in 2020 without COVID-19. The approach to normalize the traffic count data collected in August 2020 during the COVID 19 pandemic to the traffic levels that existed pre COVID-19 is presented in Final EIS Appendix Q Section 3.3, Transportation, Page 3.3-4 and summarized in Key Issue Response #2. This methodology is an industry standard approach taken during the COVID-19 pandemic and was coordinated with the City of Vernon to obtain feedback on the approach before using the adjusted volumes in the traffic analysis. The traffic volumes presented in Draft EIS/SEIR Appendix Q represent the baseline condition at the time the environmental evaluation commenced and reflect an accurate estimate of the traffic conditions to use for environmental documentation purposes.

As discussed above in Comment IND 114-1 response, implementation of Malabar Yard Mitigation Measures TR-1 through TR-5 would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts. Therefore, the Project would not worsen LOS and traffic conditions would be maintained or improved. As increased congestion during construction or operations would not occur with implementation of mitigation measures, the Project would not contribute to job losses or a decline on the local economy.

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| | **IND 114-3** The commentor is providing background information regarding business operations and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIS/SEIR. |

**Comment Number:** IND 115

**Name:** Cary Adams

**Date Received:** 08/09/24

**Format Received:** Email

Sorry being 1/2 late! Having lived all 76 years of my life here in Los Angeles, I wholeheartedly support the Union Station Project. Utilizing this wonderful Los Angeles train station, especially with through rail tracks will take us through this century and beyond. Go for it! IND 115-1

Cary Adams,

North Hollywood

## IND 115 Cary Adams

**IND 115-1** The commenter's support for the Project is noted and appreciated.

**Comment Number:** IND 116

**Name:** Sarah Peterson

**Date Received:** 08/09/24

**Format Received:** Email

To Whom it may concern:

My family is a part of the Derby Dolls community and fully support LADD's letter of concern (attached).

My daughter started skating with the junior Derby Dolls 2 years ago and has found great recreational opportunities that are not available anywhere else in the City or County. Our whole family has found wonderful community and camaraderie in the L.A. Derby Dolls endeavors. Please consider the impact you will have on this unique and cherished community-based non-profit recreational league. IND 116-1

Sincerely,

Sarah Peterson

California Landscape Architect License # 5558

[redacted] www.landspaces.net

## IND 116 Sarah Peterson

**IND 116-1** Please refer to the comprehensive responses to comments in the letter from LA Derby Dolls. The letter from LA Derby Dolls has a naming designation referred to in this EIS/SEIR as "ORG 7" (see responses to Comments ORG 7-1 through ORG 7-10).

**Comment Number:** IND 117

**Name:** Thomas Smith

**Date Received:** 08/09/24

**Format Received:** Email

To whom it may concern,

My public comment about the Link Union Station project is as follows:

I would like to express my support for the Link Union Station project. I believe that through-running and its capacity and travel speed improvements would be a significant improvement to the lives of the millions of people that can and will use Union Station for years to come. IND 117-1

I have a couple of comments: First, I would like to express my concern that the open passenger concourse should have good protection from the elements, and not be left fully open-air. Passengers from a future Los Angeles that may be warmer and wetter would greatly appreciate a cooler and drier passenger concourse. IND 117-2

Second, I would like to express a hope that the current architectural style of Union Station is kept wherever possible in the new passenger concourse. The art-deco and streamline-moderne-style interior furnishings in the current passenger concourse, such as the lights, speakers, and signs are remarkably timeless, and I hope a similar style is used for any new furnishings. Additionally, the station's architecture blends the older western and newer eastern halves of the station very well, with a mix of art deco, mission revival, streamline moderne, and styles, and southwestern colors (browns, reds, whites, yellows, etc.) prominent throughout both halves of the station. The newer, eastern half/portal does a remarkably good job of architecturally fitting with both the older, western half of the station, and the newer Metro headquarters building and the Patsaouras bus plaza. While I understand that the eastern half/portal must be significantly demolished to account for the planned railroad improvements, I hope that whatever structures that replace it have a similarly strong and locationally-fitting architectural design and style. IND 117-3

## IND 117 Thomas Smith

**IND 117-1** The commenter's support for the Project is noted and appreciated.

**IND 117-2** The commenter's concern for the proposed open passenger concourse design is noted. At this time an open-air concourse is not included as part of the Project. Final design components regarding the expanded passageway would be finalized in a later design phase of the Project; however the expended passageway is not proposed to be open to the elements.

**IND 117-3** Please refer to the Comment IND 3-1 response for description of the measures that are required to be implemented to maintain the architectural character of LAUS. As discussed in that response, the Build Alternative and Build Alternative Design Option design is intended to avoid, reduce, or minimize impacts to key character-defining features of LAUS. The Build Alternative and Build Alternative Design Option does not include modifications proposed to architecturally significant buildings and spaces that comprise the west side of LAUS, including the passenger waiting area, former ticketing room, Harvey House restaurant, and courtyards. Unfortunately, without some modifications to LAUS, physical constraints prevent the Build Alternative or Build Alternative Design Option from being implemented. Therefore, Mitigation Measure CUL-2 requires preparation and implementation of a Built Environment Treatment Plan (BETP) that

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| | details the specific actions Metro would take to resolve adverse effects on built environment historic properties, including the portion of LAUS that would be affected. |

While I realize that the renderings in the DEIR are very preliminary and conceptual, I hope that the new passenger concourse does not have such a clean, plain, bare-concrete-and-metal style as shown in the renders. I worry that it would not be particularly architecturally unique, could look out-of-date in the near future, and would not match the existing historic architecture that Los Angeles Union Station is known and loved for. IND 117-4

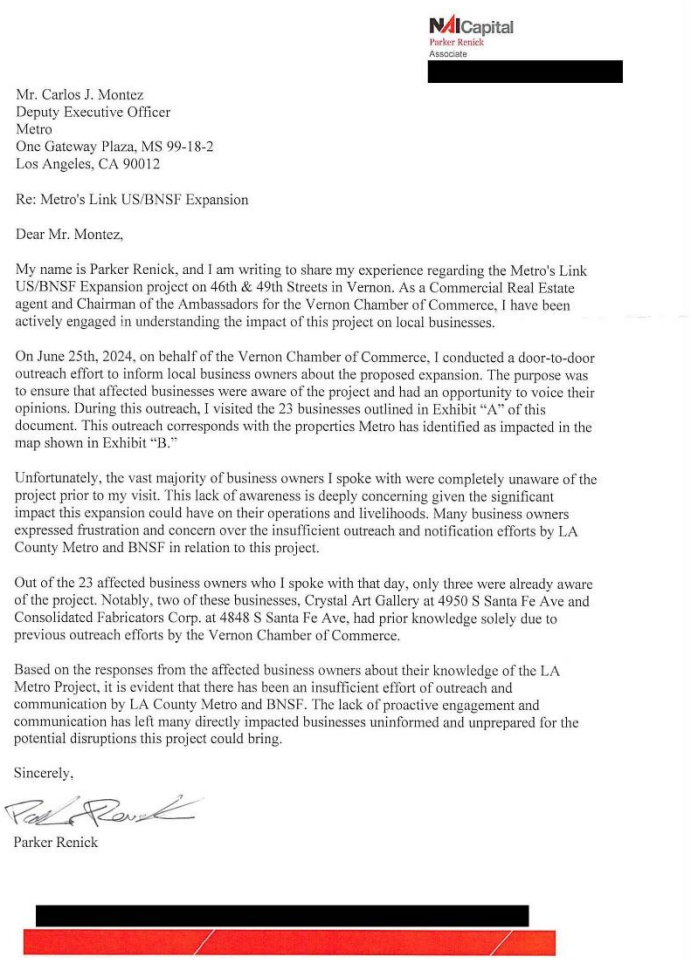
Those are my comments. Again, I want to express my support for the Link Union Station project, and hope that the project can be delivered cleanly, affordably, and effectively.

Thank you,

Thomas Smith

**IND 117-4** Please refer to the Comment IND 117-1 through IND 117-3 responses.

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| **Comment Number:** IND 118<br>**Name:** Parker Renick<br>**Date Received:** 06/06/24<br>**Format Received:** Email | **IND 118 Parker Renick** |



NMCapital
Parker Renick
Associate
[redacted]

Mr. Carlos J. Montez
Deputy Executive Officer
Metro
One Gateway Plaza, MS 99-18-2
Los Angeles, CA 90012

Re: Metro's Link US/BNSF Expansion

Dear Mr. Montez,

My name is Parker Renick, and I am writing to share my experience regarding the Metro's Link US/BNSF Expansion project on 46th & 49th Streets in Vernon. As a Commercial Real Estate agent and Chairman of the Ambassadors for the Vernon Chamber of Commerce, I have been actively engaged in understanding the impact of this project on local businesses.

On June 25th, 2024, on behalf of the Vernon Chamber of Commerce, I conducted a door-to-door outreach effort to inform local business owners about the proposed expansion. The purpose was to ensure that affected businesses were aware of the project and had an opportunity to voice their opinions. During this outreach, I visited the 23 businesses outlined in Exhibit "A" of this document. This outreach corresponds with the properties Metro has identified as impacted in the map shown in Exhibit "B."

IND 118-1

Unfortunately, the vast majority of business owners I spoke with were completely unaware of the project prior to my visit. This lack of awareness is deeply concerning given the significant impact this expansion could have on their operations and livelihoods. Many business owners expressed frustration and concern over the insufficient outreach and notification efforts by LA County Metro and BNSF in relation to this project.

Out of the 23 affected business owners who I spoke with that day, only three were already aware of the project. Notably, two of these businesses, Crystal Art Gallery at 4950 S Santa Fe Ave and Consolidated Fabricators Corp. at 4848 S Santa Fe Ave, had prior knowledge solely due to previous outreach efforts by the Vernon Chamber of Commerce.

Based on the responses from the affected business owners about their knowledge of the LA Metro Project, it is evident that there has been an insufficient effort of outreach and communication by LA County Metro and BNSF. The lack of proactive engagement and communication has left many directly impacted businesses uninformed and unprepared for the potential disruptions this project could bring.

IND 118-2

Sincerely,

Parker Renick

[redacted]

**IND 118-1** The commenter's experience and personal outreach efforts in relation to local businesses in the City of Vernon are noted. Exhibits provided by the commenter were reviewed and are appreciated.

**IND 118-2** Please refer to Key Issue Response #1 for a discussion of stakeholder engagement activities conducted in the City of Vernon to support the environmental review process for the Malabar Yard railroad improvements.

As discussed in Key Issue Response #1, Metro implemented a wide range of formal and informal outreach methods such as in-person and virtual public meetings, business and property owner briefings, coordination meetings with Vernon City staff, public presentations to the Vernon City Council, Vernon Business and Industry Commission, and Vernon Chamber of Commerce, distribution of legal advertisements, email blasts, door to door visits to potentially affected properties, phone calls to the businesses using publicly available information, Link US Project pamphlet distribution, and social media engagement. These outreach activities demonstrate that Metro and CHSRA met and exceeded legal requirements regarding responsibilities to engage and meaningfully involve all affected communities in the public decision-making process.

In 2020 and again in 2024 and 2025, Metro made physical visits to all potentially affected parcels and property owners and tenants that

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| | provided comments during the 45-day public comment period.<br><br>A summary of the notices, announcements, and mailings that were distributed to properties in Vernon is below:<br><br>• On September 22, 2020, Metro hand-delivered to owners of potentially affected properties notifications of the October 8, 2020 Virtual Public Scoping Meeting.<br><br>• On September 22, October 6, and October 8, 2020, Metro distributed flyers and e-blasts to notify individuals, organizations, and agencies on the stakeholder distribution list including property owners and tenants of potentially affected parcels, the Vernon Chamber of Commerce, the Vernon Business and Industry Commission, and City representatives of the Revised NOI and October 8, 2020 Virtual Public Scoping Meeting.<br><br>• On September 29, 2020, Metro used the County of Los Angeles assessor parcel information to notify all owners of properties traversed by the Project footprint that Metro had released a Revised NOI and that Metro was holding a Virtual Public Scoping Meeting on October 8, 2020.<br><br>• Legal advertisements for the Revised NOI and Virtual Public Scoping Meeting were issued in five newspapers in 2020.<br><br>• On October 25, 2020, Metro distributed a tri-fold pamphlet to all property owners in |

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| | the jurisdictional limits of Vernon and in the far northern portion of Huntington Park.<br>• On June 26, 2024, hand-delivered notifications were distributed to owners of all potentially affected properties to notify them of the Draft EIS/SEIR public comment period and Open House/Public Hearing.<br>• Link US Project tri-fold mailers (approximately 5,000) were distributed to owners of properties within 1-mile radius of the Malabar Yard railroad improvements prior to the Draft EIS/SEIR public review period and Open House/Public Hearing.<br>• Legal advertisements for the release of the Draft EIS/SEIR and Open House/Public Hearing were issued in four newspapers in 2024.<br><br>As discussed in key Issue Response #1, between December 2024 and February 2025, Metro also met with 10 of 11 property owners/tenants that would be directly impacted by the Malabar Yard railroad improvements and 3 additional property owners/tenants and/or representatives that are not directly impacted, but that provided comments on the Draft EIS/SEIR during the Draft EIS/SEIR public comment period. The commentor was present during one of these meetings to gather feedback on the draft responses to comments that would be presented in the Final EIS, updates on the progress of ongoing meetings being held with all affected property owners and the City, alternatives considered based on |

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| | direction from Los Angeles County Board of Supervisor Hahn's office, benefits of reduced railroad operations throughout the City, and the methods to minimize property impacts resulting from the 49th Street Closure and 46th Street Connector.<br><br>In addition, Metro's coordination activities with the City of Vernon led to the identification of community improvement measures that would offset adverse effects disclosed in the Draft EIS/SEIR. These measures are incorporated in the Final EIS as OMMs. The OMMs complement existing mitigation measures, limit potential impacts that were raised by members of the public during the 45-day public comment period, and provide benefits to the local community at large. The OMMs further support the City's planning initiatives and development goals by enhancing safety, promoting transit use, and reducing railroad-related noise and vibration impacts in areas where future mixed-use residential land uses are planned.<br><br>These community improvements are discussed in detail in Section 3.16 and Appendix G of the Final EIS Appendix Q, Environmental Evaluation of Malabar Yard Mitigation. Metro also conducted a meeting with Los Angeles County Supervisor Hahn's office on January 7, 2025, to provide an overview of the Link US Project and Malabar Yard railroad improvements, alternative sites considered, and a progress update on Metro's meetings held with affected property owners and tenants and other community members after the close of the Draft EIS/SEIR public comment period. |

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| | Representatives from Los Angeles County Supervisor Hahn's office also facilitated a meeting with Metro and the Vernon Chamber of Commerce to provide an overview of the Link US Project and Malabar Yard railroad improvements, alternative sites considered, and a progress update on Metro's meetings held with affected property owners and tenants and other community members after the close of the Draft EIS/SEIR public comment period, and to provide an overview of the citywide circulation improvements that would be realized from fewer train movements in the city. |

NAI Capital
Parker Renick
Associate
[redacted]

## Exhibit A

| APN | Address | Company |
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| 6308-008-017 | 4585 Pacific Blvd | Littlejohn Reuland |
| 6308-005-007 | 4580 Pacific Blvd | Stacey Medical Center |
| 6308-004-012 | 4618 Pacific Blvd | Flores Design Furniture |
| 6308-009-024 | 4875 Pacific Blvd | American Turn-Key Fabricators |
| 6308-005-007 | 4580 Pacific Blvd | Wells Fargo |
| 6308-004-011 | 4600 Pacific Blvd | Ownership transfer in process |
| 6308-008-030 | 2555 Chambers | Rainfield Ranches |
| 6308-005-009 | 4553 Seville | Elecoco Inc |
| 6308-001-034 | 4550 Seville | Bandwagon Brokerage Inc |
| 6308-002-016 | 4620 Seville | Undefeated |
| 6308-001-024 | 2727 46th St | Atlas Aluminum |
| 6308-002-015 | 2734 E 46th St | TCEC |
| 6308-022-014 | 2734 E 46th St | Lincoln International |
| 6308-001-023 | 4535 S Soto Ave | Kitchen Depot Import |
| 6308-009-030 | 4811 Hampton St | Dollar King |
| 6308-009-038 | 4646 Hampton St | Millennium Products/GT's Living Foods |
| 6308-010-024 | 2532 E 49th St | Easel |
| 6308-010-037 | 2516 E 49th St | Acumen Fine Art Logistics |
| 6308-011-010 | 4900 S Santa Fe Ave | American Art Decor |
| 6308-011-009 | 4950 S Santa Fe Ave | Crystal Art Gallery |
| 6308-007-006 | 4848 S Santa Fe Ave | Consolidated Fabricators Corp |
| 6308-007-012 | 4824 S Santa Fe Ave | Paper Source Converting & Manufacturing |
| 6308-004-013 | 2665 Leonis Blvd | Arcadia |

[redacted]

NMCapital
Parker Renick
Associate
[redacted]

**Exhibit B**



**Comment Number:** IND 119

**Name:** Jackson Hurst

**Date Received:** 06/05/24

**Format Received:** Email

Hi I would like to sign up for project updates and construction updates regarding the Link Union Station (Link US) Project. IND 119-1

sent from [redacted]

## IND 119 Jackson Hurst

**IND 119-1** This correspondence is a message for Metro staff, not related to the Draft EIS/SEIR. Metro staff has contacted the individual as requested.

**Comment Number:** IND 120

**Name:** Holly Harper

**Date Received:** 06/06/24

**Format Received:** Email

Good afternoon!

Planning currently has a case (located on the portion of the Terminal Annex site controlled by the California Community Foundation) requesting exceptions from the Alameda District Specific Plan; the text is found at: https://planning.lacity.gov/odocument/11788e44-7659-4e6f-95d6-4b5d5861b1ba/Alameda_District_Specific_Plan.pdf

IND 120-1

I'd like to consider how any Link US work in the public rights-of-way may, or may not, interact with the mixed-use project proposed near N Main Street and Vignes Street. I've downloaded the EIR for the Link US project but I believe that the plans for the streetscape improvements have gone through further iterations.

Any information that you can provide on Metro proposals for N Alameda, N Main and N Vignes would be much appreciated.

IND 120-2

Thank you.

Holly Harper, AIA

Pronouns: they/them/their

Planning Assistant Los Angeles City Planning

Urban Design Studio

Figueroa Plaza, 14th floor

Planning4LA.org

T: (213) 847-3706

## IND 120 Holly Harper

**IND 120-1** A consistency analysis of the Build Alternative with the applicable policies of the Alameda District Specific Plan can be found in the *Link US Community Impact Assessment*.

**IND 120-2** The Build Alternative or the Build Alternative Design Option does not preclude the implementation of mixed-use projects located near North Main Street and Vignes Street. A consistency analysis of the Build Alternative with the applicable policies of the Alameda District Specific Plan can be found in the *Link US Community Impact Assessment*. The consistency conclusions also apply to the Build Alternative Design Option as there are no design differences at this location.

The commentor does not provide specific Metro proposals/projects along North Alameda Street, North Main Street and North Vignes Street that additional information is being requested for. However, a mixed-use development at 129 College Street was included in the cumulative project list found in Draft EIS/SEIR Section 3.16 Cumulative Effects (see Draft EIS/SEIR Table 3.16-2 and Figure 3.16-1.

**Comment Number:** IND 121

**Name:** Dany Duarte

**Date Received:** 06/19/24

**Format Received:** Email

To whom it may concern

Breaking ground on an additional project in Vernon, would come as a detriment and inconvenience to the local economy, immediately adjacent to the specified project address, and abroad. We already have an unfinished project in the 4701 South Santa Fe Avenue data center, intersection with East 48th Street. Traffic is already being diverted onto East 49th Street, from a southbound approach due to the ongoing data center construction that is yet to be completed. This project has been ongoing for over two years now.

Source:
https://www.datacenterdynamics.com/en/news/prime-to-develop-33mw-facility-in-vernon-california/

IND 121-1

Increased traffic flow from both the ongoing data center construction and a possible Malabar project closure will prevent commerce from being conducted in the immediate and general vicinity. Please reconsider a better alternative plan that also addresses public safety as we have citizens speeding in the vicinity because of delays in getting to their destinations with the existing construction. Any additional projects will exacerbate the problem.

Regards,

Danny Duarte

## IND 121 Danny Duarte

**IND 121-1** The commenter notes concern for increased traffic in the City of Vernon. During recent field observations, construction activities were observed being completed at 4701 South Santa Fe Avenue. According to information available on the link provided by the commenter, the project is currently open.

Based on the traffic analysis results, the v/c ratio threshold would be exceeded at three intersections and one roadway segment; thereby causing a potential delay that would be considered an adverse effect.

Based on the impacts identified, Malabar Yard Mitigation Measures TR-1 through TR-5 are required to avoid or minimize potential adverse effects on transportation through the preparation of a Construction Traffic Management Plan, intersection restriping, and the addition of new lanes. These measures would maintain or improve the v/c ratio during construction and operation to mitigate all LOS-related traffic impacts (traffic delay). This conclusion that traffic conditions would be maintained or improved upon construction and operation of the Malabar Yard railroad improvements is presented in Final EIS Appendix Q Section 3.3, Pages 3.3-35 through 3.3-43

Please refer to Key Issue Response #2 for a discussion of the traffic impact methodology, anticipated traffic redistribution and localized impact analysis performed, and the potential

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| | queuing associated with implementation of Malabar Yard railroad improvements.<br><br>Please refer to Key Issue Response #4 for a discussion of public safety response times and emergency vehicle access. As discussed in that response, Metro performed an extensive emergency response analysis in coordination with the City of Vernon. Multiple response time scenarios were evaluated considering vehicular speed, the location and length of freight trains along each of the affected routes, response route, and emergency response destinations. Each scenario determined the specific delay which could occur to emergency response times as a result of trains being present along the affected train routes in the existing and proposed condition, which enabled the team to identify the location where trains could cause the most impactful delay to emergency response times. The location where the worst delays may occur were considered in conjunction with total daily train movements to calculate the total daily delay for response routes on each of the affected train routes. Based on the comprehensive quantitative analysis performed, the total daily delay that could potentially occur to an emergency response destination would be 13.6 minutes in the existing condition and 8.25 minutes in the proposed condition. As shown in Table 4 of the Final EIS Volume III, Introduction, the total daily delay from all train movements in the City of Vernon (Net Change) is reduced by 5.35 minutes per day. The reduction of total daily delay is a result of 3.15 fewer trains operating on the Harbor Subdivision (4 daily train movements – Existing; 0.85 daily train |

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| | movements – Future). The analysis above demonstrates that the total daily delay is reduced; however, to retain a conservative analysis and conclusion in the environmental documentation, no changes were made to the Draft EIS/SEIR conclusion related to response times for emergency service providers. |

**Comment Number:** IND 122

**Name:** Brianna Egan

**Date Received:** 08/10/24

**Format Received:** Email

Attn: Carlos J. Montez, Deputy Executive Officer One Gateway Plaza, MS 99-18-2, Los Angeles, CA 90012

On the Link Union Station project, I would like to submit the following comments on the Draft EIS/SEIR:

Ensure that the infrastructure built will accommodate electrified overhead catenary wires for future electrification of Metrolink, Amtrak, and CAHSR lines. If possible, please electrify all the tracks as part of this project to upgrade for future electrified service of all passenger intercity rail lines. IND 122-1

Include provisions to build loop tracks in the future to accommodate through-running of regional high-frequency Metrolink lines from North and South directions. This would include the ability for Ventura County (VC) Line, Antelope Valley (AV) Line, San Bernardino (SB) Line, Orange County (OC) Line, and 91/Perris Valley Line to through-run from North, South, and East to allow for new connections and service patterns. IND 122-2

Accommodate the Measure HLA-mandated mobility plan upgrades to North Main Street with a Tier 1 protected bike lane. Consider the narrowing of vehicle lanes or reducing travel lanes for vehicles. IND 122-3

Continue to collaborate with stakeholder agencies including Metrolink, Amtrak, and CAHSR to utilize LinkUS to enhance and improve intercity rail service into Los Angeles and regionally. Consider potential opportunities to reduce pollution and emissions from freight rail operations by implementing electrification infrastructure for these uses as well. IND 122-4

Thank you!

Brianna Egan

Redondo Beach, CA 90277

## IND 122 Brianna Egan

**IND 122-1** The commenter's preference for future electrification is noted. The Build Alternative or Build Alternative Design Option does not preclude future overhead catenaries to support electrified trains through the Project limits because operators are currently using diesel trains. It should be noted that Metrolink, Amtrak, and CHSRA, as the rail operators through LAUS, would be responsible for the purchase and operation of electrified trains that move through the Project limits.

**IND 122-2** The Build Alternative or Build Alternative Design Option does not include a loop track but would still reduce train movement constraints resulting from stub-end operation by providing run-through service consistent with the California State Rail Plan, the SCORE Program, and the Purpose and Need for the Project. See Comment IND 61-1 response for additional information.

**IND 122-3** The proposed safety improvements at North Main Street are currently designed at a preliminary level and are proposed in accordance with CPUC regulations to maximize safety by prohibiting vehicular traffic from crossing into opposite lanes of traffic within the vicinity of the at-grade railroad crossing. As discussed in the Draft EIS/SEIR, Section 3.14, a safety assessment was completed for the Project which focused on pedestrian/bicycle safety conditions near the existing rail alignment and at the one the at-grade crossing where proposed

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| | improvements would occur (North Main Street). The proposed safety improvements would maximize safety for all roadway users (vehicular, bicycle, and pedestrian) in alignment with several policies of Chapter 1.0, Safety First of the *Mobility Plan 2035*; including Policy 1.5 Railroad Crossings that states "Reduce conflicts and improve safety at railroad crossings through design, planning and operation" as well as Policy 1.1 Roadway User Vulnerability that states "Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user".<br><br>Metro will continue to coordinate with the City of Los Angeles as the design process advances to maximize safety at the North Main Street railroad crossing while not precluding future active transportation improvements that the City of Los Angeles may elect to implement. The City of Los Angeles has the discretion to implement the future quiet zone separate to or in conjunction with upgrades on North Main Street identified in the *Mobility Plan 2035*, and the Project would not preclude such actions.<br><br>The Final EIS Chapter 2.0, Section 2.7.1 has been revised as follows:<br><br>On March 5, 2024, Measure HLA, also known as Healthy Streets LA, was passed and requires the City of Los Angeles to install street enhancements outlines in its *Mobility Plan 2035* when making road repairs. |

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| | **IND 122-4** Metro will continue to collaborate with stakeholders including Metrolink, Amtrak, and CHSRA. The Build Alternative and Build Alternative Design Option does not preclude future electrification of tracks though the Project limits to reduce pollution and emissions from regional/intercity rail operations. Mitigation Measure AQ-3 also requires implementation of alternative rail technologies to reduce diesel emissions from trains. Mitigation Measure AQ-3 applies to the Build Alternative and the Build Alternative Design Option. |

**Comment Number:** IND 123

**Name:** Frederick Leung

**Date Received:** 08/11/24

**Format Received:** Email

Greetings,

I would like to share some input regarding the Link union station project. I strongly support this project to improve our regional rail system (metrolink, amtrak, HSR). IND 123-1

I suggest minimum of four run through tracks with an ideal of six run through tracks sharing between metrolink, Amtrak, HSR. These run-through tracks would also need to be electrified. The station would also need an additional passenger walkway (aerial) to accommodate future passenger growth. The project should begin ASAP. The longer you wait, the higher construction cost you expect. IND 123-2

Thank you,

Fred

## IND 123 Frederick Leung

**IND 123-1** The commenter's support for the Project is noted.

**IND 123-2** As shown on Table 2-1 of the Draft EIS/SEIR Chapter 2.0, Track Alignment Alternative 14 was recommended for full evaluation as part of the Build Alternative in the Draft EIS/SEIR. The Build Alternative Design Option would accommodate four run-through tracks for regional/intercity rail trains and four run-through tracks for HSR trains from LAUS to the west bank of the Los Angeles River. The Build Alternative Design Option does not preclude the future electrification of tracks through the Project limits.

An above-grade concourse (includes aerial passenger connection above the elevated rail yard) was rejected from further consideration because it does not maintain or improve passenger transfer times or align with community preference. Concourse Concept 6 was recommended for full evaluation as part of the Build Alternative in the Draft EIS/SEIR (see Table 2-2 of the Draft EIS/SEIR). The Build Alternative Design Option would include a 100-foot-wide expanded passageway below the partially elevated rail yard, new VCEs, and an east plaza.

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