



SOUTH BAY CITIES
COUNCIL OF GOVERNMENTS

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DRAFT

March 9, 2021

Dolores Roybal Saltarelli
Project Manager
Los Angeles Metro
One Gateway Plaza
Mail Stop: 99-22-4
Los Angeles, CA 90012

Subject: C (Green) Line Extension EIR Scoping Comments

Dear Ms. Roybal Saltarelli:

The South Bay Cities Council of Governments (SBCCOG) welcomes the initiation of the Environmental Impact Report preparation process for the extension of the C (Green) Line to Torrance project pursuant to the California Environmental Quality Act (CEQA). This vital step will keep the project among Metro's highest rail development priorities as the region prepares for the 2028 Olympics and Paralympic Games and to ensure the Metro Board will meet its commitment to open the line well before the Measure M expenditure plan 2033 deadline.

We understand the EIR analysis will evaluate two routes and several profile alternatives between the existing Redondo Beach Marine Station and the under-construction Torrance Transit Center.

The SBCCOG looks forward to providing our thoughts on the project alternatives once the Draft EIR is completed and prior to Metro's selection of the Locally Preferred Alternative. However, we are sensitive to a wide range of community concerns that have been raised during previous studies about impacts and mitigations on both routes.

To provide the most comprehensive analysis of options, mitigations and costs, we urge Metro to include all feasible profiles in the Draft EIR for environmentally sensitive segments on both alignments. While it may result in a more complex document, it will help ensure the Final EIR can be prepared without the need for a Supplemental EIR and without delaying design and construction of the project.

The SBCCOG also requests Metro to evaluate the circulation and access to the two stations being evaluated for each alignment. We strongly support inclusion of a properly-sized parking structure in the C (Green) Line project EIR at the Torrance Transit Center since this station will become the new C (Green) Line terminal station for the foreseeable future.

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Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

We are also requesting Metro to include evaluation of a non-pedestrian connection between the Galleria station on the Hawthorne Boulevard route and the existing Redondo Transit Center, which are approximately 2/3 mile apart. Because this is an unacceptable walking distance, the C (Green Line) EIR should include a Metro bus, shuttle, or other non-pedestrian connection in the project scope.

South of 190th Street, the two light rail route alternatives merge into a single alignment to reach the Torrance Transit Center. SBCCOG is very concerned with how the Metro-owned right-of-way will be shared by freight tracks and the light rail double track. We urge Metro to start negotiating now to establish the parameters of a solution that ensures Metro's ability to add light rail double tracks while continuing to share Metro's right of way with the railroads which must have access to their customers in the segment and must store empty rail cars in the vicinity of the San Pedro ports.

SBCCOG, Metro, and local communities have been working on this project for more than a decade. The SBCCOG looks forward to continued involvement in the project development process to assist Metro to plan, design and deliver this important project. We urge Metro to fully evaluate the options, impacts and mitigations in the project's first formal EIR so that an accurate project scope and costs can be estimated and the project can proceed into design and construction without further delay.

Thank you for considering our scoping comments.

Sincerely,

Olivia Valentine
Chair, South Bay Cities Council of Governments
Mayor Pro Tem, City of Hawthorne

c.c.: SBCCOG Board of Directors
L. A. Metro Board of Directors