SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES AERIAL RAPID TRANSIT PROJECT
LOS ANGELES, CALIFORNIA

November 2025

State Clearinghouse No. 2020100007

FINAL SUPPLEMENTAL EIR

Prepared for:

Los Angeles County Metropolitan Transportation Authority

Metro®

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1.0 Introduction

LA Aerial Rapid Transit Technologies LLC (LA ARTT), as the Project Sponsor, is proposing the Los Angeles Aerial Rapid Transit Project (Project). The Los Angeles County Metropolitan Transportation Authority (Metro) is the Lead Agency for the proposed Project in accordance with the California Environmental Quality Act (CEQA). This Final Supplemental Environmental Impact Report (SEIR) has been prepared for consideration by Metro. Metro prepared a Draft SEIR to update analysis of construction noise mitigation measures for the Project in response to the Court of Appeal's opinion in *Los Angeles Parks Alliance, et al. v. Los Angeles County Metropolitan Transportation Authority, et al.* (Case Nos. B340838, B340931) (the Court Opinion).[1] The Court of Appeal directed Metro to prepare a supplemental EIR to address the issues regarding construction noise identified in the Court Opinion and to request consultation with the Santa Monica Mountains Conservancy (SMMC) prior to publication of the Draft SEIR. On July 30, 2025, Metro sent the SMMC a request for consultation, providing a 30-day comment period. SMMC did not provide a response within the 30-day period. On September 29, 2025, Metro released the Draft SEIR for a 45-day public review period that concluded on November 13, 2025.

1.1 Overview of the Draft SEIR

In accordance with the Court Opinion, the Draft SEIR considered the feasibility of implementing acoustical retrofitting in buildings along the Project alignment as mitigation for the proposed Project's significant construction noise impacts. The Draft SEIR identified the legal and practical considerations and constraints associated with an acoustic retrofit program. Implementing acoustic retrofits would require substantial construction activities within occupied buildings, potentially lasting weeks or months, and in some cases necessitating temporary displacement of residents or occupants. Implementation would also require case-by-case consent from property owners, tenants, and occupants, and permitting or other approvals depending on building conditions. Because Metro lacks authority to compel such work, the program would depend entirely on voluntary participation which Metro and LA ARTT could neither compel nor control for purposes of efficacy and timing. In addition, any resulting noise reduction may be limited and contingent on windows remaining closed, and implementation of such retrofits would involve invasive construction within occupied buildings. Given these considerations and others, the Draft SEIR concluded that acoustic retrofitting to address temporary construction noise along the Project alignment is not a feasible mitigation strategy.

The Draft SEIR also responded to the Court Opinion's concerns regarding Mitigation Measure (MM) NOI-A by explaining the effectiveness of MM-NOI-A's various components. Some components, such as maintaining equipment and limiting idling, were already assumed in the LA ART EIR's noise modeling or required by law and therefore did not provide additional noise reduction. Others, such as using on-site electrical sources instead of diesel generators, or locating equipment away from sensitive receptors, could have some mitigating effect, but the LA ART EIR did not adequately explain their effectiveness. Accordingly, the Draft SEIR refines MM-NOI-A by retaining as mitigation only those components expected to provide partial noise reduction from modeled noise levels, and reclassifying the remaining components as Project Design Features (NOI-PDF-B). NOI-PDF-B would be included in the Project's Mitigation

[1] See *Los Angeles Parks Alliance, et al. v. Los Angeles County Metropolitan Transportation Authority, et al.* (Case Nos. B340838, B340931), available at: https://www4.courts.ca.gov/opinions/nonpub/B340838.PDF.

Monitoring and Reporting Program (MMRP) to ensure the requirements are enforceable and that construction noise levels do not exceed those assumed in the LA ART EIR.

The Draft SEIR was limited to the discrete construction noise mitigation issues identified by the Court Opinion and summarized above. The LA ART EIR's analysis of all other environmental topics was upheld by the Court of Appeal and remains unchanged.

1.2 Purpose of the Final SEIR

This Final SEIR is intended to assist Metro and responsible and trustee agencies in making decisions regarding the adoption of the proposed Project. As required by CEQA Guidelines section 15132, the Final SEIR includes: (i) the Draft SEIR or a revision of the draft; (ii) comments and recommendations received on the Draft SEIR (either verbatim or in summary); (iii) a list of persons, organizations, and public agencies who commented on the Draft SEIR; (iv) responses to comments received regarding the Draft SEIR; and (v) any other relevant information added by the lead agency. Responses to public comments made on the Draft SEIR are included in Section 3.0, Responses to Comments, of this Final SEIR.

Corrections and additions to the Draft SEIR since circulation of the Draft SEIR are provided in Section 2.0, Corrections and Additions, of the Final SEIR. Such modifications would not be considered "significant new information" pursuant to CEQA Guidelines Section 15088.5 such that the public has been deprived of a meaningful opportunity to comment upon a substantial adverse environmental effect of the proposed Project or a feasible way to mitigate or avoid such an effect. The general corrections and additions to the Draft SEIR would not alter its conclusions regarding the significant impacts to construction noise of the proposed Project or result in any new or substantially more severe significant environmental impacts.

1.3 Final SEIR Organization

This Final SEIR is comprised of the sections listed below.

1.0 Introduction. This section briefly discusses the purpose of the Final SEIR and the contents of this Final SEIR.

2.0 Corrections and Additions. This section identified any revisions made to provide more details, clarify, and/or correct the text and graphics contained within the Draft SEIR. These revisions were either initiated by the lead agency or made to address comments received during the public review period. New content is shown in underline and removed content is shown through strikethrough. None of these corrections or additions constitute new information which would necessitate a recirculation of the Draft SEIR.

3.0 Responses to Comments. This section contains a list of commenting agencies and individuals that submitted comments to Metro during the public review period for the Draft SEIR. Copies of the original written comment letters and a transcript of the comments received at the November 6, 2025, public hearing are provided in Appendices A-C of this Final SEIR.

4.0 Mitigation Monitoring and Reporting Program. This section includes the MMRP for the proposed Project. The MMRP lists the mitigation measures and project design features by environmental topic and identifies the responsible party, monitoring agency, enforcement agency, monitoring phase, monitoring frequency, and action(s) indicating compliance.

5.0 References. This section includes a list of reference and source materials used in the preparation of this Final SEIR.

6.0 List of Preparers. This section lists the individuals involved in the preparation of this Final SEIR and the organizations and persons consulted.

2.0 Corrections and Additions

2.1 Introduction

This section of the Final SEIR provides changes to the Draft SEIR that have been made to clarify, correct, or add to the environmental impact analysis for the proposed Project. Such changes are a result of public and agency comments received in response to the Draft SEIR during the public comment review period and/or new information that has become available since publication of the Draft SEIR. The changes described in this section do not result in any new or increased significant environmental impacts that would result from the proposed Project.

2.2 General Corrections and Additions to the Draft SEIR

Construction Noise Mitigation

NOI-PDF-B

As described in Section 3.0, Construction Noise Mitigation, of the Draft SEIR, the proposed Project committed to construction practices and management protocols that Metro assumed in its noise modeling, including compliance with existing regulatory requirements, which are necessary to ensure actual construction noise levels remain consistent with the levels disclosed in the LA ART EIR. In response to comments suggesting that Project construction should be coordinated with community and special events to minimize potential construction noise impacts on such events and that construction-related outreach be provided in multiple languages, an addition to the Draft SEIR has been provided for Section 3.0, Construction Noise Mitigation, to add these Project commitments to Project Design Feature NOI-PDF-B.

2.3 Corrections and Additions to Draft SEIR Sections and Appendices

Specific text changes have been made to the Draft SEIR Sections and Appendices based on public comments received on the Draft SEIR. Such changes to the Draft SEIR are indicated under the appropriate Draft SEIR section with deletions shown in ~~strikethrough~~ and additions shown in underline.

Executive Summary

No specific text changes have been made to this Section of the Draft SEIR.

Section 1.0: Introduction

No specific text changes have been made to this Section of the Draft SEIR.

Section 2.0: Project Description

No specific text changes have been made to this Section of the Draft SEIR.

Section 3.0: Construction Noise Mitigation

In addition to the general additions and corrections provided above, revise Section 3.0, Construction Noise Mitigation, as follows:

Pages 44 - 45, revise Section 3.7 as follows:

Project Design Feature – NOI-PDF-B: Project Noise Control Requirements for Construction Noise Management Plan:

The Construction Noise Management Plan prepared pursuant to MM-NOI-A shall include the following requirements:

- **Equipment Maintenance:** Construction equipment shall be properly maintained per manufacturers' specifications to prevent noise due to worn or improperly maintained parts and shall be fitted with the best available noise suppression devices (e.g., mufflers, lagging, and/or motor enclosures). All impact tools shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded.
- **Use of Electrical Sources:** When possible, on-site electrical sources shall be used to power equipment rather than diesel generators.
- **Community Outreach:** The following shall be implemented to reduce impacts to the local community related to disturbances from construction noise:
  - *Noise Disturbance Coordinator:* A noise and vibration disturbance coordinator shall be established. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The noise and vibration disturbance coordinator shall determine the cause of the complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to address the complaint. Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event a complaint is received, appropriate corrective actions shall be implemented, and a report of the action provided to the reporting party. <u>The noise disturbance coordinator shall conduct outreach to residents and small businesses in English, Spanish, Vietnamese, Chinese (Traditional), and Chinese (Simplified) regarding proposed construction activities.</u>
  - *Construction Notice:* The construction coordinator shall provide a construction notice to residents and businesses within 500 feet of the construction site for each Project component prior to initiation of construction activities. The construction site notice shall include job site address, anticipated equipment to be used and duration of construction activities, permit number, name and phone number of the job super intendent, construction hours, and the City telephone number where violations can be reported. The notice will also include the phone number of the noise disturbance coordinator. <u>The notice will be made available in English, Spanish, Vietnamese, Chinese (Traditional), and Chinese (Simplified).</u>
  - <u>*Special and Community Event Coordination:* Construction activities will be coordinated to the extent feasible with special and community events reported to the noise disturbance coordinator. Requests for event coordination may be made by calling the number of the noise disturbance coordinator provided on the construction notice.</u>

- **Limit Idling Equipment:** Construction equipment shall not idle for longer than 5 minutes, as required by section 2485 of the California Code of Regulations.

Section 4.0: References

No specific text changes have been made to this Section of the Draft SEIR.

Section 5.0: List of Preparers

No specific text changes have been made to this Section of the Draft SEIR.

Appendix A: AECOM Acoustics Technical Report

No specific text changes have been made to this Section of the Draft SEIR.

Appendix B: Public Resources Code Section 21168.6.9

No specific text changes have been made to this Section of the Draft SEIR.

2.4 Effect of Corrections and Additions

CEQA Guidelines Section 15088.5 requires that an EIR that has been made available for public review, but not yet certified, be recirculated only if significant new information has been added to the EIR. New information is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of a project or a feasible way to mitigate or avoid such an effect that the project's proponents have declined to implement. Recirculation is not required when the new information clarifies or amplifies or makes insignificant modifications to an adequate EIR. The primary examples of when an EIR must be recirculated are identified below:

- A new significant environmental impact would result from the project or from a new mitigation measure. (CEQA Guidelines, § 15088.5(a)(1).)
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance. (CEQA Guidelines, § 15088.5(a)(2).)
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it. (CEQA Guidelines, § 15088.5(a)(3).)

While the Final SEIR has been revised where appropriate to respond to public comments, it does not contain any significant new information that would deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect or a feasible way to mitigate or avoid such an effect. The information contained in this section merely clarifies, amplifies, or makes insignificant changes to the information that has already been presented in the Draft SEIR. Thus, none of the conditions in Section 15088.5 of the CEQA Guidelines are met, and recirculation is not required.

3.0 Responses to Comments

3.1 Introduction

Section 15088(a) of the CEQA Guidelines states that the "lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The Lead Agency shall respond to comments that were received during the noticed comment period and may respond to late comments." This section of the Final SEIR provides a list of persons, organizations, and public agencies that commented on the Draft SEIR, along with responses of the Lead Agency to significant environmental points raised.

The Draft SEIR was submitted to the State Clearinghouse, Governor's Office of Land Use and Climate Innovation (formerly the Office of Planning and Research), and circulated for a 45-day public review from September 29, 2025, to November 13, 2025. The following comments on the Draft SEIR were received (see Table 3.1).

- Total comment letters submitted by letter, voicemail, or email: 950
- Speakers who provided oral comments at the November 6, 2025, public meeting: 89

All comments and responses to comments included in this Final SEIR will be considered by the Metro Board prior to (1) re-certifying and certifying the LA ART EIR, as supplemented by the Final SEIR, (2) adopting findings regarding the proposed Project's significant environmental effects and mitigation measures, (3) adopting a Statement of Overriding Considerations, and (4) reapproving of the Project.

This Final SEIR includes responses to all comments received on the Draft SEIR during the Draft SEIR public review period, including comments made at the November 6, 2025, public hearing. Section 3.2 provides topical responses to common issues raised by commenters. Section 3.3 provides responses to individual comments.

Comments received during the public review period on the Draft SEIR generally fall into two categories. The first includes comments that address the updated construction noise mitigation analyses, raise other significant environmental issues within the scope of the SEIR, or present new environmental information that was not reasonably known and available at the time the LA ART EIR was certified. The second includes comments outside the scope of the SEIR, such as general opinions about the Project or issues previously addressed in the LA ART EIR and unaffected by the updated analysis. As explained in the Draft SEIR, the scope of the SEIR is limited to evaluating the topics raised in the Court Opinion. Comments that are outside the scope are responded to collectively in Topical Response 1, Comment Is Outside the Scope of the SEIR.

All comment letters received on the Draft SEIR during the 45-day public review period are included in the appendices to this Final SEIR:

- Appendix A includes all comments that address the updated noise analysis or raise other issues within the scope of the Draft SEIR; these comments received individual written responses.
- Appendix B includes comments outside the scope of the Draft SEIR, including general comments on the Project or comments that did not raise issues regarding the sufficiency or adequacy of the

Draft SEIR. These comments are responded to collectively in Section 3.3.1, Response to General Written Comments on the Project.

- Appendix C includes all oral comments made during the November 6, 2025, virtual public hearing.

Table 3-1 below provides a complete list of comments received during the 45-day Draft SEIR public review period. Each comment that raised significant environmental issues within the scope of the SEIR, including comments pertaining to the sufficiency or adequacy of the Draft SEIR, has been separated and numbered for an individual response. These comments use a tiered numbering system (ex. PA1-1, GO1-1, P1-1, PH1-1) where the first number identifies the comment letter and the second number identifies the specific comment within that letter.[2] Where a comment letter contains both general comments and comments warranting an individual response, only the comments warranting an individual response are assigned a specific comment number. The first comment receiving an individual response in comment letter P1, for example, would be defined as comment P1-1, while the remainder of the comment letter may not be assigned specific comments number if it contains general comments.

Comments that did not raise significant environmental issues within the scope of the SEIR, such as general comments on the Project or comments raising issues previously addressed in the LA ART EIR and unaffected by the updated analysis, were not assigned individual numbers. Instead, they are responded to collectively in Section Section 3.3.1 of this Final SEIR.

Table 3-1: List of Comments Received on the Draft SEIR

Comment Number	Name	Organization	Date of Comment
Public Agencies			
PA1	Steve Veres, Chairperson	Santa Monica Mountains Conservancy (SMMC)	11/18/2025
PA2	Eunisses Hernandez	Los Angeles City Councilmember, District 1	11/13/2025
Groups and Organizations			
GO1	John Given	LA Parks Alliance	11/12/2025
GO2	Amanda Stemen	Sierra Club, Central Group, Angeles Chapter	11/12/2025
GO3		Los Angeles Conservancy	11/13/2025
GO4	Douglas Carstens	The California Endowment	11/13/2025
GO5		Stop the Gondola Coalition	11/13/2025
GO6	Ron Krueper	CA State Park Rangers Association	11/13/2025
GO7		Metro Senior Lofts	11/13/2025
GO8		Savoy Street Neighbors	11/13/2025
Individuals			
Comments Receiving Individual Response			
P1	Susan Miller		10/11/2025
P2	Anne Dorsey		10/18/2025
P3	Phyllis Ling		10/27/2025
P4	Jennifer Robinson		10/27/2025

[2] The comments receiving individual responses are organized as follows: public agencies ("PA"), groups and organizations ("GO"), individuals ("P"), and comments received during the November 6, 2025, public hearing ("PH").

Comment Number	Name	Organization	Date of Comment
P5	Hans Deustch		10/27/2025
P6	Louise Cowen		10/27/2025
P7	Jennifer Malins		10/27/2025
P8	Anne Dorsey		10/27/2025
P9	Josephina Sykes		10/27/2025
P10	Gavin Brennan		10/27/2025
P11	Merle Freeman		10/27/2025
P12	Michael Powers		10/27/2025
P13	Dave Ptach		10/27/2025
P14	Diana Beardsly		10/27/2025
P15	Megha Kohil		10/27/2025
P16	Elvin Vu		10/27/2025
P17	Neel Keller		10/27/2025
P18	Tim O'Brien		10/27/2025
P19	Miro Horberg		10/27/2025
P20	Elonda Norris		10/27/2025
P21	Lisa Karahalios		10/27/2025
P22	Maria Dexina		10/27/2025
P23	Danton Miller		10/27/2025
P24	Robert Tom		10/27/2025
P25	Nicole Antonie		10/27/2025
P26	Julia Carso		10/27/2025
P27	Kevin M		10/27/2025
P28	Julie Rico		10/27/2025
P29	Debra Spinelli		10/27/2025
P30	Melissa Powers		10/27/2025
P31	Dane Giesregen		10/27/2025
P32	Kim Silverstein		10/27/2025
P33	Amber Espinosa-Jones		10/27/2025
P34	Tori Lucifora		10/27/2025
P35	Anita Carachure		10/27/2025
P36	Edward Costello		10/27/2025
P37	Juli Kang		10/27/2025
P38	Sue Yank		10/27/2025
P39	Sari Navarro		10/27/2025
P40	Bettina Moss		10/27/2025
P41	Matthew Orlove		10/27/2025
P42	Eduardo Borrego		10/27/2025
P43	Elliot Fong		10/27/2025
P44	Melissa Melendez		10/27/2025
P45	Eric Nobunaga		10/27/2025
P46	Abraham Ahn		10/27/2025
P47	Minerva Flores		10/27/2025
P48	Robin Blackman		10/27/2025
P49	Jared Jeffries		10/27/2025
P50	Jason Moritz		10/27/2025
P51	Kate Wolf		10/27/2025
P52	Melissa Finell		10/27/2025

Comment Number	Name	Organization	Date of Comment
P53	Victoria Brandon		10/27/2025
P54	Yvonne Diaz		10/27/2025
P55	Manuel Perez		10/27/2025
P56	Rachelle Arsian		10/27/2025
P57	Laraine Moniz		10/27/2025
P58	Jennifer Kao		10/27/2025
P59	Megan Singleton		10/27/2025
P60	Leo Charbonneau		10/27/2025
P61	Alicia Diaz		10/27/2025
P62	Jimmy Yan		10/27/2025
P63	Matthew Dubois		10/27/2025
P64	Judith Rogers		10/27/2025
P65	Veronica Huerta		10/27/2025
P66	Alice Kordosh		10/27/2025
P67	Allen Glass		10/27/2025
P68	Marion White		10/27/2025
P69	Marion Siu		10/27/2025
P70	Lilah Mehri		10/27/2025
P71	Frances Tait		10/27/2025
P72	Erica Goebel		10/27/2025
P73	Sarajo Frieden		10/27/2025
P74	Rick Teplitz		10/27/2025
P75	Natalie Zarowny		10/27/2025
P76	Karin Costello		10/27/2025
P77	Cayla McCrae		10/27/2025
P78	Christopher Fudurich		10/27/2025
P79	Gabriela Arroyo		10/27/2025
P80	Alan Ehrlich		10/27/2025
P81	Daniel Brewer		10/27/2025
P82	Donald Sloper		10/27/2025
P83	Preston Wood		10/27/2025
P84	SANDRA NEEDS		10/27/2025
P85	Anna-Jane Tabler		10/27/2025
P86	Frank Halstead		10/27/2025
P87	Laura Cambonchi		10/27/2025
P88	Leslie Lipps		10/27/2025
P89	Jason Chu		10/27/2025
P90	Logan Andrzejewski		10/27/2025
P91	Michael Scanlon		10/27/2025
P92	Lara Fischman		10/27/2025
P93	Martha Atwell		10/27/2025
P94	Jason M. Moritz		10/27/2025
P95	Amber Espinosa-Jones		10/27/2025
P96	NADIA Taha		10/27/2025
P97	Lisa Karahalios		10/27/2025
P98	Nathaniel Heidt		10/27/2025
P99	Samantha Kelly		10/27/2025
P100	Joel Freeman		10/27/2025

Comment Number	Name	Organization	Date of Comment
P101	Angela Zhou		10/27/2025
P102	Larry Herr		10/27/2025
P103	Heather Santora		10/27/2025
P104	Aaron Cabral		10/27/2025
P105	Raul Macias		10/27/2025
P106	Jesse Jimenez		10/28/2025
P107	Carlos Navarrette		10/28/2025
P108	Sofia Casias		10/28/2025
P109	Bz Zhang		10/28/2025
P110	Suzel Bertrand		10/28/2025
P111	Carol Cetrone		10/28/2025
P112	Claire Lamneck		10/28/2025
P113	Paris Eley		10/28/2025
P114	Crystal Baranyk		10/28/2025
P115	Paul Tepper		10/28/2025
P116	Angie An		10/28/2025
P117	Neil Wedge		10/28/2025
P118	Philip Murphy		10/28/2025
P119	Jessie Her		10/28/2025
P120	Mary Mallory		10/28/2025
P121	Jenna Cobb		10/28/2025
P122	Phyl van Ammers		10/28/2025
P123	Holly Peterson		10/29/2025
P124	Ben Covette		10/29/2025
P125	Emily Berry		10/29/2025
P126	Stephen Johnson		10/29/2025
P127	Katherine Markova		10/30/2025
P128	Daniel Ralston		10/30/2025
P129	Richard Devletian		10/30/2025
P130	Casa Wilson		10/30/2025
P131	Cassandra Baez		10/31/2025
P132	Stephanie Scott		11/1/2025
P133	Julie Rico		11/1/2025
P134	Manuel Pires		11/2/2025
P135	Hannah Rose Dexter		11/3/2025
P136	Francisca Salazar		11/3/2025
P137	Melissa Martinez		11/3/2025
P138	Yra Lopez		11/4/2025
P139	Manuel Martinez		11/4/2025
P140	Cayla McCrae		11/4/2025
P141	Stephanie Aston		11/4/2025
P142	Bella Gomez		11/4/2025
P143	Bella Gomez		11/4/2025
P144	Boris Worister		11/4/2025
P145	Braden Pontoli		11/4/2025
P146	Brittany Rochford		11/4/2025
P147	Heather Lockie		11/4/2025
P148	Laura Beatty		11/4/2025

Comment Number	Name	Organization	Date of Comment
P149	Liliana Cortez		11/4/2025
P150	Lydia Barrett		11/4/2025
P151	Sarah Morgan		11/4/2025
P152	Marja Kay		11/5/2025
P153	Nancy Hoven		11/5/2025
P154	Robert reyes Villagomez		11/5/2025
P155	Alexandra Formella		11/6/2025
P156	Ann Dorsey		11/6/2025
P157	Bz Zhang		11/6/2025
P158	mahfam@castaneafellowship.org		11/6/2025
P159	Michael Manning		11/6/2025
P160	Richard Rojas		11/6/2025
P161	Annie Chuong		11/6/2025
P162	ladyenyaj@gmail.com		11/6/2025
P163	Christine Linh		11/6/2025
P164	ddl8@yahoo.com		11/6/2025
P165	sycamorecity@gmail.com		11/6/2025
P166	Lyn Gaza		11/6/2025
P167	Sjoerd Oostrik		11/6/2025
P168	mjang@aapiequityalliance.org		11/6/2025
P169	Soraya Barabi		11/6/2025
P170	hello@audreychan.net		11/6/2025
P171	andreask@usc.edu		11/6/2025
P172	Ray Corpus		11/6/2025
P173	Luke Macdonald		11/6/2025
P174	Heather Lockie		11/7/2025
P175	Tany Ling		11/9/2025
P176	Chase Puskar		11/9/2025
P177	Alice L		11/9/2025
P178	Chase Puskar		11/9/2025
P179	Angela Anguiano		11/10/2025
P180	Kristy Chan		11/10/2025
P181	Justin Mercado		11/11/2025
P182	Brandon Padilla		11/11/2025
P183	Julianne Papadopoulos		11/11/2025
P184	Rebecca Cumberland		11/11/2025
P185	Ron Frank		11/12/2025
P186	Jennifer Lazo		11/12/2025
P187	Sandra Vadhin		11/12/2025
P188	Anahy Hernandez		11/13/2025
P189	Caroline Seon		11/13/2025
P190	Luke Macdonald		11/13/2025
P191	Sara Wick		11/13/2025
P192	Phyllis Chiu		11/13/2025
P193	Gabriel Arellano		11/13/2025
P194	Yahaira Guerrero		11/13/2025
P195	Suellen Wagner		11/13/2025
P196	Karina Corbera		11/13/2025

Comment Number	Name	Organization	Date of Comment
P197	Joyce Dillard		11/13/2025
P198	Ron Frank		11/13/2025
P199	Andrew Greene		11/13/2025
P200	Breda Lund		11/13/2025
P201	Vince Leus		11/13/2025
P202	Karina Corbera		11/13/2025
P203	Thomas Smith		11/13/2025
P204	Daniel Bae		11/13/2025
P205	Michael Ferrero		11/13/2025
P206	Michelle Wang		11/13/2025
P207	Andy H		11/13/2025
P208	Maraky Alemseged		11/13/2025
P209	Selene Medina		11/13/2025
P210	Juni Wong		11/13/2025
P211	Emilie Hu		11/13/2025
P212	Rosasela Mora		11/13/2025
P213	Casey Wong		11/13/2025
P214	Jamie Gallo		11/13/2025
P215	Charles Soji Thomas		11/13/2025
P216	Diana Chang		11/13/2025
P217	Ding Kong		11/13/2025
P218	Jennifer Fong		11/13/2025
P219	Ana Corbera		11/13/2025
P220	doodleswithoutborders@gmail.com		11/13/2025
P221	Pars Watson		11/13/2025
P222	Izak Chu		11/13/2023
P223	maraky@baji.org		11/13/2025
P224	Craig Wong		11/13/2025
General Comments			
See Section 3.3.1	Debbie Spinelli		9/29/2025
See Section 3.3.1	Tony Torres		9/29/2025
See Section 3.3.1	Andrew Wang		9/30/2025
See Section 3.3.1	Austin Durant		9/30/2025
See Section 3.3.1	Brian Wakil		9/30/2025
See Section 3.3.1	Judykiwikeeper		9/30/2025
See Section 3.3.1	Marty Meltzer		9/30/2025
See Section 3.3.1	Richard Parks		9/30/2025
See Section 3.3.1	Abra Sonnanstine		10/1/2025
See Section 3.3.1	Adam Gilbert		10/1/2025
See Section 3.3.1	Akhsar Kharebov		10/1/2025
See Section 3.3.1	Alex Ward		10/1/2025
See Section 3.3.1	Andrew Wang		10/1/2025
See Section 3.3.1	Anthony Denaro		10/1/2025
See Section 3.3.1	Calla Wiemer		10/1/2025
See Section 3.3.1	Carol Gordon		10/1/2025
See Section 3.3.1	Cedric Meyers		10/1/2025
See Section 3.3.1	Charles Biederman		10/1/2025
See Section 3.3.1	Christine Loeb		10/1/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Christine Meek		10/1/2025
See Section 3.3.1	Colin Raymond		10/1/2025
See Section 3.3.1	Dana Roth		10/1/2025
See Section 3.3.1	Danielle Moody		10/1/2025
See Section 3.3.1	Deborah Y		10/1/2025
See Section 3.3.1	Denise Chamiam		10/1/2025
See Section 3.3.1	Donna Carleo		10/1/2025
See Section 3.3.1	Eliot Phillips		10/1/2025
See Section 3.3.1	George Hewitt		10/1/2025
See Section 3.3.1	Howard Rudnick		10/1/2025
See Section 3.3.1	Jamie Scott		10/1/2025
See Section 3.3.1	Jeremy Kramer		10/1/2025
See Section 3.3.1	Jonah Bliss		10/1/2025
See Section 3.3.1	Julie Bailey		10/1/2025
See Section 3.3.1	Karin Costello		10/1/2025
See Section 3.3.1	Kathy Kunysz		10/1/2025
See Section 3.3.1	Marko		10/1/2025
See Section 3.3.1	Matt Waggoner		10/1/2025
See Section 3.3.1	Neil Kramer		10/1/2025
See Section 3.3.1	Nick Satyal		10/1/2025
See Section 3.3.1	Susan Lynch		10/1/2025
See Section 3.3.1	Susanna Dooley Boney		10/1/2025
See Section 3.3.1	Suzanne Buhai		10/1/2025
See Section 3.3.1	Tom Rodriguez		10/1/2025
See Section 3.3.1	Vignette Ching		10/1/2025
See Section 3.3.1	Vince Curtis		10/1/2025
See Section 3.3.1	Will Finch		10/1/2025
See Section 3.3.1	Ze X		10/1/2025
See Section 3.3.1	Ace Acabras		10/2/2025
See Section 3.3.1	Joe Hilberman		10/2/2025
See Section 3.3.1	MJ		10/3/2025
See Section 3.3.1	Jessica Feldman		10/5/2025
See Section 3.3.1	Jennifer Pierce		10/6/2025
See Section 3.3.1	Michael McNally		10/6/2025
See Section 3.3.1	Amadeus		10/7/2025
See Section 3.3.1	David Freid		10/7/2025
See Section 3.3.1	Mac Firgens		10/8/2025
See Section 3.3.1	Topher Hendricks		10/8/2025
See Section 3.3.1	Dan Harrison		10/9/2025
See Section 3.3.1	Elizabeth Daubel		10/9/2025
See Section 3.3.1	Jeffrey Faller		10/9/2025
See Section 3.3.1	Nancy Starczyk		10/9/2025
See Section 3.3.1	Will Wright		10/9/2025
See Section 3.3.1	Greg Camphire		10/10/2025
See Section 3.3.1	Freddie		10/13/2025
See Section 3.3.1	Amadeus		10/14/2025
See Section 3.3.1	Joe Hilberman		10/14/2025
See Section 3.3.1	Mary Prince		10/14/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Nancy Norris		10/14/2025
See Section 3.3.1	Nick Spark		10/14/2025
See Section 3.3.1	Rick Teplitz		10/14/2025
See Section 3.3.1	Susanna Ruiz		10/15/2025
See Section 3.3.1	Steff		10/16/2025
See Section 3.3.1	Amy Leisinger		10/17/2025
See Section 3.3.1	Carmen Zella		10/17/2025
See Section 3.3.1	Thomas Fisher		10/17/2025
See Section 3.3.1	Jorge Quezada		10/18/2025
See Section 3.3.1	Helen Eric		10/20/2025
See Section 3.3.1	Andrew White		10/21/2025
See Section 3.3.1	Carter Vander Moore		10/21/2025
See Section 3.3.1	Geoff Tock		10/21/2025
See Section 3.3.1	Jenni X		10/21/2025
See Section 3.3.1	Stephen Zimmerman		10/21/2025
See Section 3.3.1	Will Yum		10/21/2025
See Section 3.3.1	Daniel Gould		10/22/2025
See Section 3.3.1	Peter Salmon		10/22/2025
See Section 3.3.1	Angel Linares		10/23/2025
See Section 3.3.1	Karla Silva		10/23/2025
See Section 3.3.1	Adrian Hildago		10/25/2025
See Section 3.3.1	Elo Cervantes		10/25/2025
See Section 3.3.1	John Koiso		10/25/2025
See Section 3.3.1	Maria Bullis		10/25/2025
See Section 3.3.1	Nicholas Bocanegra		10/25/2025
See Section 3.3.1	Gina Elias		10/26/2025
See Section 3.3.1	Lisa Callejas		10/26/2025
See Section 3.3.1	Samuel Mares		10/26/2025
See Section 3.3.1	Aleem Hossain		10/27/2025
See Section 3.3.1	David Grannis		10/27/2025
See Section 3.3.1	Gabbie Metheny		10/27/2025
See Section 3.3.1	Tim Wilcox		10/27/2025
See Section 3.3.1	Alberto Cortez		10/28/2025
See Section 3.3.1	Amy Rossetti		10/28/2025
See Section 3.3.1	Anise Young		10/28/2025
See Section 3.3.1	Anna Demarco		10/28/2025
See Section 3.3.1	Anthony Correa		10/28/2025
See Section 3.3.1	Armand del la Torre		10/28/2025
See Section 3.3.1	Auada Lupepozos		10/28/2025
See Section 3.3.1	Betssy Gauia		10/28/2025
See Section 3.3.1	Bob Horning		10/28/2025
See Section 3.3.1	Brandan Hunter-Davis		10/28/2025
See Section 3.3.1	Carlos Gonzales		10/28/2025
See Section 3.3.1	Carlos Verde		10/28/2025
See Section 3.3.1	Carmen Baquero		10/28/2025
See Section 3.3.1	Carmen Calhoun		10/28/2025
See Section 3.3.1	Chris Hernandez		10/28/2025
See Section 3.3.1	Chris Hernandez		10/28/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Christine Moore		10/28/2025
See Section 3.3.1	Christopher Jones		10/28/2025
See Section 3.3.1	Damonte James		10/28/2025
See Section 3.3.1	Debra Martinez		10/28/2025
See Section 3.3.1	Eduardo Santoyo		10/28/2025
See Section 3.3.1	Eduardo Santoyo		10/28/2025
See Section 3.3.1	Elus Arce		10/28/2025
See Section 3.3.1	Estanislao Cilio		10/28/2025
See Section 3.3.1	Fred Wink		10/28/2025
See Section 3.3.1	George Agular		10/28/2025
See Section 3.3.1	George Francisco		10/28/2025
See Section 3.3.1	Greg Astorian		10/28/2025
See Section 3.3.1	Iliana Medel		10/28/2025
See Section 3.3.1	Illegible Name		10/28/2025
See Section 3.3.1	Illegible Name		10/28/2025
See Section 3.3.1	Jacob Kuykendall		10/28/2025
See Section 3.3.1	Jacqueline Montaya		10/28/2025
See Section 3.3.1	Jason Benton		10/28/2025
See Section 3.3.1	Jay Marte		10/28/2025
See Section 3.3.1	Joaqun Aguilar		10/28/2025
See Section 3.3.1	John Musella		10/28/2025
See Section 3.3.1	Jordana Strofs		10/28/2025
See Section 3.3.1	Jose Funes		10/28/2025
See Section 3.3.1	Jose H. Fune		10/28/2025
See Section 3.3.1	Jose Polento		10/28/2025
See Section 3.3.1	Juan B		10/28/2025
See Section 3.3.1	Julianne Solorzano		10/28/2025
See Section 3.3.1	Kristine Granz		10/28/2025
See Section 3.3.1	Kwesi Lee		10/28/2025
See Section 3.3.1	Laszlo Onody		10/28/2025
See Section 3.3.1	Laszlo Onody		10/28/2025
See Section 3.3.1	Laura Hayes		10/28/2025
See Section 3.3.1	Leoncio Equivel		10/28/2025
See Section 3.3.1	Luis Cedillo		10/28/2025
See Section 3.3.1	Manuel Gonzalez		10/28/2025
See Section 3.3.1	Maria Gonzalez		10/28/2025
See Section 3.3.1	Maria Schwanzara		10/28/2025
See Section 3.3.1	Marissa Vazquez		10/28/2025
See Section 3.3.1	Martha Rendon		10/28/2025
See Section 3.3.1	Mary Fernandez		10/28/2025
See Section 3.3.1	Maximiano Anguiano		10/28/2025
See Section 3.3.1	Micah McKay		10/28/2025
See Section 3.3.1	Michael Perez		10/28/2025
See Section 3.3.1	Miguel Juarez		10/28/2025
See Section 3.3.1	Miguel Juarez		10/28/2025
See Section 3.3.1	Miguel Juarez		10/28/2025
See Section 3.3.1	Miguel Juarez		10/28/2025
See Section 3.3.1	Misael Baquero		10/28/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Monika Orozco		10/28/2025
See Section 3.3.1	Nancy Starczyk		10/28/2025
See Section 3.3.1	Ophelia Overton		10/28/2025
See Section 3.3.1	Ophelia Overton		10/28/2025
See Section 3.3.1	Peter Cara		10/28/2025
See Section 3.3.1	Richard Santos		10/28/2025
See Section 3.3.1	Robert Morales		10/28/2025
See Section 3.3.1	Robert Morales		10/28/2025
See Section 3.3.1	Roberto Arnold		10/28/2025
See Section 3.3.1	Robin Feldman		10/28/2025
See Section 3.3.1	Roeilio Aguilar		10/28/2025
See Section 3.3.1	Rosalida Mojia		10/28/2025
See Section 3.3.1	Rudy Gonzelez		10/28/2025
See Section 3.3.1	Sandra Arroyo		10/28/2025
See Section 3.3.1	Stanly Ibaria		10/28/2025
See Section 3.3.1	Tara Kerin		10/28/2025
See Section 3.3.1	Tyrel Desmarais		10/28/2025
See Section 3.3.1	Virgia Lospez		10/28/2025
See Section 3.3.1	Virgie Lopez		10/28/2025
See Section 3.3.1	Virginia Lopez		10/28/2025
See Section 3.3.1	Will Wright		10/28/2025
See Section 3.3.1	Xavier Menifield		10/28/2025
See Section 3.3.1	Yeuy Zapata		10/28/2025
See Section 3.3.1	Alec Maghami		10/29/2025
See Section 3.3.1	Andrew Urena		10/29/2025
See Section 3.3.1	Brandon Hurt		10/29/2025
See Section 3.3.1	Christian Frink		10/29/2025
See Section 3.3.1	Christopher Luna		10/29/2025
See Section 3.3.1	Christopher Nyambura		10/29/2025
See Section 3.3.1	Danyel Semple		10/29/2025
See Section 3.3.1	Elizabeth De Carteret		10/29/2025
See Section 3.3.1	Foday Momoh		10/29/2025
See Section 3.3.1	Grant Muirhead		10/29/2025
See Section 3.3.1	Haydn Jones		10/29/2025
See Section 3.3.1	Jade McCrary		10/29/2025
See Section 3.3.1	Jahnel Walker		10/29/2025
See Section 3.3.1	Jelani Arriaga		10/29/2025
See Section 3.3.1	Kelly Marble		10/29/2025
See Section 3.3.1	Kim Wolf		10/29/2025
See Section 3.3.1	LaDarius Torrey		10/29/2025
See Section 3.3.1	Lisette Estrada		10/29/2025
See Section 3.3.1	Louis Macarthur		10/29/2025
See Section 3.3.1	Louis Macarthur		10/29/2025
See Section 3.3.1	Marcella Torres		10/29/2025
See Section 3.3.1	Michael Amster		10/29/2025
See Section 3.3.1	Natalia Castro		10/29/2025
See Section 3.3.1	Nicole Atoyan		10/29/2025
See Section 3.3.1	Omar Muhammad		10/29/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Raquel Suarez		10/29/2025
See Section 3.3.1	Riya Suising		10/29/2025
See Section 3.3.1	Steffany Villalobos		10/29/2025
See Section 3.3.1	Stephane Shorter		10/29/2025
See Section 3.3.1	Stephen Sorkin		10/29/2025
See Section 3.3.1	Aleksei Lotarev		10/30/2025
See Section 3.3.1	Amy Genut		10/30/2025
See Section 3.3.1	Andrew Aguirre		10/30/2025
See Section 3.3.1	Charlotte Flanagan		10/30/2025
See Section 3.3.1	Christal Lotarev		10/30/2025
See Section 3.3.1	Daniel Liu		10/30/2025
See Section 3.3.1	Grant Muirhead		10/30/2025
See Section 3.3.1	Jeff Moyer		10/30/2025
See Section 3.3.1	Joseph Gill		10/30/2025
See Section 3.3.1	Robert Badoux		10/30/2025
See Section 3.3.1	Sophie Dover		10/30/2025
See Section 3.3.1	Tom Lucid		10/30/2025
See Section 3.3.1	Alicia Oseda		10/31/2025
See Section 3.3.1	Allen Wong		10/31/2025
See Section 3.3.1	Amara Anderson		10/31/2025
See Section 3.3.1	Ampaso Cabrera		10/31/2025
See Section 3.3.1	Amy Miller		10/31/2025
See Section 3.3.1	Andy Gift		10/31/2025
See Section 3.3.1	Anna Yu		10/31/2025
See Section 3.3.1	Annie Brad		10/31/2025
See Section 3.3.1	Bahn Mi 828		10/31/2025
See Section 3.3.1	California Kids		10/31/2025
See Section 3.3.1	Cari Tina Cayo		10/31/2025
See Section 3.3.1	Chris Moralro		10/31/2025
See Section 3.3.1	Cynthia Ly		10/31/2025
See Section 3.3.1	Daniela Sanchez		10/31/2025
See Section 3.3.1	Darlin Sanchez		10/31/2025
See Section 3.3.1	Dave Malagon		10/31/2025
See Section 3.3.1	David H. Le		10/31/2025
See Section 3.3.1	Denise Sanchez		10/31/2025
See Section 3.3.1	Dillion Temple		10/31/2025
See Section 3.3.1	Duyen Chow		10/31/2025
See Section 3.3.1	DW Market		10/31/2025
See Section 3.3.1	Ella Alteration		10/31/2025
See Section 3.3.1	Ella Shop		10/31/2025
See Section 3.3.1	Emma Febiona RH		10/31/2025
See Section 3.3.1	Esther Suarez		10/31/2025
See Section 3.3.1	Evangelina Zesati		10/31/2025
See Section 3.3.1	George Guitierrez Jr.		10/31/2025
See Section 3.3.1	Gloria Duran		10/31/2025
See Section 3.3.1	Goohui Li		10/31/2025
See Section 3.3.1	Great Wall		10/31/2025
See Section 3.3.1	Gus Rodriguez		10/31/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Harvest Travel		10/31/2025
See Section 3.3.1	Heidi Rodriguez		10/31/2025
See Section 3.3.1	Helen Wishing Glory Gift		10/31/2025
See Section 3.3.1	Hong Dang H &T		10/31/2025
See Section 3.3.1	Illegible Name		10/31/2025
See Section 3.3.1	Illegible Name		10/31/2025
See Section 3.3.1	Illegible Name		10/31/2025
See Section 3.3.1	Illegible Name		10/31/2025
See Section 3.3.1	Illegible Name		10/31/2025
See Section 3.3.1	Illegible Name		10/31/2025
See Section 3.3.1	Illegible Name		10/31/2025
See Section 3.3.1	Illegible Name		10/31/2025
See Section 3.3.1	Intiraynii Restaurant		10/31/2025
See Section 3.3.1	Jade Wok		10/31/2025
See Section 3.3.1	Jeff Moreaux		10/31/2025
See Section 3.3.1	Jennifer Velazquez		10/31/2025
See Section 3.3.1	John Hiss		10/31/2025
See Section 3.3.1	Jose Luis-Sanchez		10/31/2025
See Section 3.3.1	Jose Velazquez		10/31/2025
See Section 3.3.1	Julio Estrella		10/31/2025
See Section 3.3.1	Ken Wong		10/31/2025
See Section 3.3.1	Kenny Pou		10/31/2025
See Section 3.3.1	Kim Carnazzela		10/31/2025
See Section 3.3.1	Leou Kigoe		10/31/2025
See Section 3.3.1	Li Suzhen		10/31/2025
See Section 3.3.1	Liu Zhang He		10/31/2025
See Section 3.3.1	Los Compradres Oxaya		10/31/2025
See Section 3.3.1	Lucky Market		10/31/2025
See Section 3.3.1	Lyn Chow		10/31/2025
See Section 3.3.1	Marc Thopin		10/31/2025
See Section 3.3.1	Maria Guerra		10/31/2025
See Section 3.3.1	Maria My		10/31/2025
See Section 3.3.1	Maria Rios		10/31/2025
See Section 3.3.1	Marshall Miller		10/31/2025
See Section 3.3.1	Martha Aru		10/31/2025
See Section 3.3.1	Martin Flores		10/31/2025
See Section 3.3.1	May Tower Restaurant Seafood		10/31/2025
See Section 3.3.1	Michael		10/31/2025
See Section 3.3.1	Michelle L. Abada		10/31/2025
See Section 3.3.1	Ming Hui Liu		10/31/2025
See Section 3.3.1	Monica Pierson		10/31/2025
See Section 3.3.1	Morano Martall		10/31/2025
See Section 3.3.1	Nice Failia		10/31/2025
See Section 3.3.1	Paul Hiss		10/31/2025
See Section 3.3.1	Peach Fuzz Salon		10/31/2025
See Section 3.3.1	Puz Fang Fong		10/31/2025
See Section 3.3.1	Ramona Lopez		10/31/2025
See Section 3.3.1	Ramona Zesati		10/31/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Rosa Gift		10/31/2025
See Section 3.3.1	Roy		10/31/2025
See Section 3.3.1	Ruo Shuin Hu		10/31/2025
See Section 3.3.1	Saz Fashion		10/31/2025
See Section 3.3.1	Socorro Lugo		10/31/2025
See Section 3.3.1	Tian Dim Sum		10/31/2025
See Section 3.3.1	Tom Skinner		10/31/2025
See Section 3.3.1	Trinidad Zesati		10/31/2025
See Section 3.3.1	Uno Gift Shop		10/31/2025
See Section 3.3.1	Veronica Wold		10/31/2025
See Section 3.3.1	Victoria Tucay		10/31/2025
See Section 3.3.1	Cynthia James		11/1/2025
See Section 3.3.1	Gabriela Rosales		11/1/2025
See Section 3.3.1	Jacqueline Scott-Douglas		11/1/2025
See Section 3.3.1	Patricia James		11/1/2025
See Section 3.3.1	Ramona Jones		11/1/2025
See Section 3.3.1	Will Noyes		11/1/2025
See Section 3.3.1	Adam Cole		11/2/2025
See Section 3.3.1	Stephanie Noyes		11/2/2025
See Section 3.3.1	Adam Karaczynski		11/3/2025
See Section 3.3.1	Aleem Hossain		11/3/2025
See Section 3.3.1	Brian Camat		11/3/2025
See Section 3.3.1	Cynthia Vant Hul		11/3/2025
See Section 3.3.1	David Brown		11/3/2025
See Section 3.3.1	Edward J. Costello		11/3/2025
See Section 3.3.1	Elvin Minh Huy Vu		11/3/2025
See Section 3.3.1	Francisco Partida		11/3/2025
See Section 3.3.1	Jane Mwangi		11/3/2025
See Section 3.3.1	Jennifer Kempski		11/3/2025
See Section 3.3.1	Marty Meltzer		11/3/2025
See Section 3.3.1	Michel Lara		11/3/2025
See Section 3.3.1	Rosalynn Frausto		11/3/2025
See Section 3.3.1	Sarah Back		11/3/2025
See Section 3.3.1	Sarah Starr		11/3/2025
See Section 3.3.1	Yvonne Rosas Petty		11/3/2025
See Section 3.3.1	Zabrinna Lugo		11/3/2025
See Section 3.3.1	Gavin Brennan		11/4/2025
See Section 3.3.1	Michael Schapiro		11/4/2025
See Section 3.3.1	Amy Artenowicz		11/5/2025
See Section 3.3.1	David Kim		11/5/2025
See Section 3.3.1	Gilbert Calderon		11/5/2025
See Section 3.3.1	Hilary Norton		11/5/2025
See Section 3.3.1	Jordan Lang		11/5/2025
See Section 3.3.1	Kirin Obrien		11/5/2025
See Section 3.3.1	Kirin Obrien_11052025		11/5/2025
See Section 3.3.1	Marc Futernick		11/5/2025
See Section 3.3.1	Randy Duke		11/5/2025
See Section 3.3.1	Suja Lowenthal		11/5/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Amy Arentowicz		11/6/2025
See Section 3.3.1	Andrew Montealegre		11/6/2025
See Section 3.3.1	Andy Wong		11/6/2025
See Section 3.3.1	Angela Capito		11/6/2025
See Section 3.3.1	Anna Corbera		11/6/2025
See Section 3.3.1	Antonio Alvarez		11/6/2025
See Section 3.3.1	Aro Z		11/6/2025
See Section 3.3.1	Aro Z		11/6/2025
See Section 3.3.1	Bob Horning		11/6/2025
See Section 3.3.1	Brenda Montes		11/6/2025
See Section 3.3.1	Carlos Navarrett		11/6/2025
See Section 3.3.1	Casey Wong		11/6/2025
See Section 3.3.1	Casey Wong		11/6/2025
See Section 3.3.1	Christopher Monger		11/6/2025
See Section 3.3.1	Craig Wong		11/6/2025
See Section 3.3.1	Danny Marzuka		11/6/2025
See Section 3.3.1	David Fried		11/6/2025
See Section 3.3.1	David Madeo		11/6/2025
See Section 3.3.1	David Parra		11/6/2025
See Section 3.3.1	David Parra		11/6/2025
See Section 3.3.1	Delfina Cantero		11/6/2025
See Section 3.3.1	Diane Prozeller		11/6/2025
See Section 3.3.1	Diane Weiss		11/6/2025
See Section 3.3.1	Dominic Soo		11/6/2025
See Section 3.3.1	Edith Gonzalez		11/6/2025
See Section 3.3.1	Edith Gonzalez		11/6/2025
See Section 3.3.1	Edward Flores		11/6/2025
See Section 3.3.1	Edwin Li		11/6/2025
See Section 3.3.1	Eric Adams		11/6/2025
See Section 3.3.1	Esmeralda		11/6/2025
See Section 3.3.1	Esther Gonzalez		11/6/2025
See Section 3.3.1	Faraz Aqil		11/6/2025
See Section 3.3.1	Gary Barsley		11/6/2025
See Section 3.3.1	George Tong		11/6/2025
See Section 3.3.1	Gibson Mwangi		11/6/2025
See Section 3.3.1	Giovani Martinez		11/6/2025
See Section 3.3.1	Gisela Brigido		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Illegible		11/6/2025
See Section 3.3.1	Jelani Arriaga		11/6/2025
See Section 3.3.1	Jennifer Tocquigny		11/6/2025
See Section 3.3.1	Jeremy Padilla		11/6/2025
See Section 3.3.1	Jessica Wang		11/6/2025
See Section 3.3.1	Jessica Wang		11/6/2025
See Section 3.3.1	Jessy Reed		11/6/2025
See Section 3.3.1	Jessy Reed		11/6/2025
See Section 3.3.1	Jimmy Blair		11/6/2025
See Section 3.3.1	Jin		11/6/2025
See Section 3.3.1	Joel Wilbur		11/6/2025
See Section 3.3.1	Joey Silva		11/6/2025
See Section 3.3.1	Jon Price		11/6/2025
See Section 3.3.1	Jon Pricing		11/6/2025
See Section 3.3.1	Jonathan Hersh		11/6/2025
See Section 3.3.1	Jonathan Riker		11/6/2025
See Section 3.3.1	Jorge Quesada		11/6/2025
See Section 3.3.1	Jose Oseguera		11/6/2025
See Section 3.3.1	Joseph Laskowski		11/6/2025
See Section 3.3.1	Josh Gray-Emmer		11/6/2025
See Section 3.3.1	Julie Rico		11/6/2025
See Section 3.3.1	Julie Rico		11/6/2025
See Section 3.3.1	Junie Wong		11/6/2025
See Section 3.3.1	Junie Wong		11/6/2025
See Section 3.3.1	Justo Lopez Elias		11/6/2025
See Section 3.3.1	Karlyn Parker		11/6/2025
See Section 3.3.1	Layal Bata		11/6/2025
See Section 3.3.1	Lila Flanders		11/6/2025
See Section 3.3.1	Lionel Mares		11/6/2025
See Section 3.3.1	Liz		11/6/2025
See Section 3.3.1	Marcy Romero		11/6/2025
See Section 3.3.1	Maria Cervantes		11/6/2025
See Section 3.3.1	Maria Cordova		11/6/2025
See Section 3.3.1	Marian Dodge		11/6/2025
See Section 3.3.1	Mario Cervantes		11/6/2025
See Section 3.3.1	Mark Lomali		11/6/2025
See Section 3.3.1	Mark Lomeli		11/6/2025
See Section 3.3.1	Mary Martinez		11/6/2025
See Section 3.3.1	Matt Mason		11/6/2025
See Section 3.3.1	Meika Best		11/6/2025
See Section 3.3.1	Michael Torres		11/6/2025
See Section 3.3.1	Mike Borisov		11/6/2025
See Section 3.3.1	Mike Swanson		11/6/2025
See Section 3.3.1	Monica		11/6/2025
See Section 3.3.1	Morena Martelli		11/6/2025
See Section 3.3.1	Nicholas Caton		11/6/2025
See Section 3.3.1	Norma Virgen		11/6/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Omar Madrigal		11/6/2025
See Section 3.3.1	Patrick Chen		11/6/2025
See Section 3.3.1	Patrick Chen		11/6/2025
See Section 3.3.1	Paul Almeida		11/6/2025
See Section 3.3.1	Philip Murphy		11/6/2025
See Section 3.3.1	Phyllis Chu		11/6/2025
See Section 3.3.1	Raina Dominguez		11/6/2025
See Section 3.3.1	Ray Wu Corpus		11/6/2025
See Section 3.3.1	Rebecca		11/6/2025
See Section 3.3.1	Rebecca Hernandez		11/6/2025
See Section 3.3.1	Rena Bustillos		11/6/2025
See Section 3.3.1	Richard Crook		11/6/2025
See Section 3.3.1	Robert Dominguez		11/6/2025
See Section 3.3.1	Robert Quintero		11/6/2025
See Section 3.3.1	Ron Frank		11/6/2025
See Section 3.3.1	Ron Krueper		11/6/2025
See Section 3.3.1	Rory Hayes		11/6/2025
See Section 3.3.1	Rory Hayes		11/6/2025
See Section 3.3.1	Sakae Koyama		11/6/2025
See Section 3.3.1	Set HR		11/6/2025
See Section 3.3.1	Soraya Barabi		11/6/2025
See Section 3.3.1	Steven Martinez		11/6/2025
See Section 3.3.1	Steven Martinez		11/6/2025
See Section 3.3.1	Susan Lai		11/6/2025
See Section 3.3.1	Susan Lai		11/6/2025
See Section 3.3.1	Tavaso Ozawa		11/6/2025
See Section 3.3.1	Terry Anglin		11/6/2025
See Section 3.3.1	Tochil Banzanilla		11/6/2025
See Section 3.3.1	Tochil Banzanilla		11/6/2025
See Section 3.3.1	Tom Rodriguez		11/6/2025
See Section 3.3.1	Tracy Shortle		11/6/2025
See Section 3.3.1	Veronica Soto		11/6/2025
See Section 3.3.1	Xinyang		11/6/2025
See Section 3.3.1	Yesenia Lio		11/6/2025
See Section 3.3.1	Adam Remba		11/7/2025
See Section 3.3.1	Austin Durant		11/7/2025
See Section 3.3.1	Camellia Lee		11/7/2025
See Section 3.3.1	Chasen Daniels		11/7/2025
See Section 3.3.1	Claudia Moran		11/7/2025
See Section 3.3.1	Diane Weiss		11/7/2025
See Section 3.3.1	Donald Sloper		11/7/2025
See Section 3.3.1	Edward J Costello		11/7/2025
See Section 3.3.1	Emanuel Rodriguez		11/7/2025
See Section 3.3.1	Francisco Cortez		11/7/2025
See Section 3.3.1	Geoff Tock		11/7/2025
See Section 3.3.1	Jeanine Scott		11/7/2025
See Section 3.3.1	Joseph Ancewicz		11/7/2025
See Section 3.3.1	Julie Rico		11/7/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Mark Gibbs		11/7/2025
See Section 3.3.1	Melissa Louise Castellano		11/7/2025
See Section 3.3.1	Nancy Gottesman		11/7/2025
See Section 3.3.1	Oriana Bumi		11/7/2025
See Section 3.3.1	Rebecca Hofflund		11/7/2025
See Section 3.3.1	Rebecca Hofflund		11/7/2025
See Section 3.3.1	Robert Jacobson		11/7/2025
See Section 3.3.1	Sasha Espinosa		11/7/2025
See Section 3.3.1	Sean Murphy		11/7/2025
See Section 3.3.1	Steve Melnick		11/7/2025
See Section 3.3.1	Tom Rodriguez		11/7/2025
See Section 3.3.1	Charley Mims		11/8/2025
See Section 3.3.1	Jeff Harris		11/8/2025
See Section 3.3.1	Kathy Rogers		11/8/2025
See Section 3.3.1	Leo Charbonneau		11/8/2025
See Section 3.3.1	Stephen Zimmerman		11/8/2025
See Section 3.3.1	Bradley Draifinger		11/9/2025
See Section 3.3.1	David K. Seitz		11/9/2025
See Section 3.3.1	Gavin Brennan		11/9/2025
See Section 3.3.1	Jonathan Levy		11/9/2025
See Section 3.3.1	Paul Gasiorkiewicz		11/9/2025
See Section 3.3.1	synth.analog@yahoo.com		11/9/2025
See Section 3.3.1	Valerie Menker		11/9/2025
See Section 3.3.1	Heather Lockie		11/10/2025
See Section 3.3.1	Jesse Budlong		11/10/2025
See Section 3.3.1	Jesse Budlong		11/10/2025
See Section 3.3.1	John Blevins		11/10/2025
See Section 3.3.1	Marlin Bartschi		11/10/2025
See Section 3.3.1	Richard Wimbleton		11/10/2025
See Section 3.3.1	Steve Massey		11/10/2025
See Section 3.3.1	Taery Anglin		11/10/2025
See Section 3.3.1	Tany Ling		11/10/2025
See Section 3.3.1	Josh Ruby		11/11/2025
See Section 3.3.1	Alec Rubay		11/11/2025
See Section 3.3.1	Alex Corey		11/11/2025
See Section 3.3.1	Alex Corey_2		11/11/2025
See Section 3.3.1	Andres Gonzalez		11/11/2025
See Section 3.3.1	Andres Gutierrez		11/11/2025
See Section 3.3.1	Andrew Hill		11/11/2025
See Section 3.3.1	Armando Quinones		11/11/2025
See Section 3.3.1	Barry Woletz		11/11/2025
See Section 3.3.1	Chris Bostock		11/11/2025
See Section 3.3.1	Christian Medina		11/11/2025
See Section 3.3.1	Chuck Murphy		11/11/2025
See Section 3.3.1	Colton Berger		11/11/2025
See Section 3.3.1	Dan Wentzel		11/11/2025
See Section 3.3.1	David Thomas		11/11/2025
See Section 3.3.1	Edith Gonzalez		11/11/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Eduardo Iniguez		11/11/2025
See Section 3.3.1	Everett Wise		11/11/2025
See Section 3.3.1	George Bukhin		11/11/2025
See Section 3.3.1	Humberto Lozano		11/11/2025
See Section 3.3.1	Ivan Flores		11/11/2025
See Section 3.3.1	Jen Moore		11/11/2025
See Section 3.3.1	Jon Gollihugh		11/11/2025
See Section 3.3.1	Joshua Vitelli		11/11/2025
See Section 3.3.1	Judy Kameon		11/11/2025
See Section 3.3.1	Julian Orozco-Chavarria		11/11/2025
See Section 3.3.1	Kevin Priest		11/11/2025
See Section 3.3.1	Kyle Stinson		11/11/2025
See Section 3.3.1	Leslie Ridings		11/11/2025
See Section 3.3.1	Luis Noriega		11/11/2025
See Section 3.3.1	Marian Dodge		11/11/2025
See Section 3.3.1	Michael Tagupa		11/11/2025
See Section 3.3.1	Misha Gravenor		11/11/2025
See Section 3.3.1	NIKOLA ZECEVIC		11/11/2025
See Section 3.3.1	Parker Smith		11/11/2025
See Section 3.3.1	Roy Jea		11/11/2025
See Section 3.3.1	Ryan Wilson		11/11/2025
See Section 3.3.1	Scott Dicus		11/11/2025
See Section 3.3.1	Stephen Randall		11/11/2025
See Section 3.3.1	Steven Roussey		11/11/2025
See Section 3.3.1	Steven Scheibe		11/11/2025
See Section 3.3.1	Tany Ling (with 10,000 signatures)		11/11/2025
See Section 3.3.1	Tany Ling (with 128 opposition letters attached)		11/11/2025
See Section 3.3.1	Tany Ling (with 163 opposition letters attached)		11/11/2025
See Section 3.3.1	Tany Ling (with 180 opposition letters attached)		11/11/2025
See Section 3.3.1	Tany Ling (with 185 opposition letters attached)		11/11/2025
See Section 3.3.1	Tany Ling (with 190 opposition letters attached)		11/11/2025
See Section 3.3.1	Tany Ling (with 200 opposition letters attached)		11/11/2025
See Section 3.3.1	Tany Ling (with 242 opposition letters attached)		11/11/2025
See Section 3.3.1	Tany Ling (with 253 opposition letters attached)		11/11/2025
See Section 3.3.1	Tany Ling (with 269 opposition letters attached)		11/11/2025
See Section 3.3.1	Thomas Price		11/11/2025
See Section 3.3.1	Timothy Grant		11/11/2025
See Section 3.3.1	Tony Reed		11/11/2025
See Section 3.3.1	Ulises Silva		11/11/2025
See Section 3.3.1	Zach Golden		11/11/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Alex Kennedy		11/12/2025
See Section 3.3.1	Alexis Crockett		11/12/2025
See Section 3.3.1	Andrew Hernandez		11/12/2025
See Section 3.3.1	Andrew Hernandez		11/12/2025
See Section 3.3.1	Arsen Avagyan		11/12/2025
See Section 3.3.1	Ben Goldhaber		11/12/2025
See Section 3.3.1	Brent Pritchett		11/12/2025
See Section 3.3.1	Christopher Roman		11/12/2025
See Section 3.3.1	David Cho		11/12/2025
See Section 3.3.1	Davidson White		11/12/2025
See Section 3.3.1	Donald Freid		11/12/2025
See Section 3.3.1	Eric Snyder		11/12/2025
See Section 3.3.1	Eric Vartany		11/12/2025
See Section 3.3.1	Gavin Brennan		11/12/2025
See Section 3.3.1	Gil Hetsroni		11/12/2025
See Section 3.3.1	Henry Olortegui		11/12/2025
See Section 3.3.1	J C		11/12/2025
See Section 3.3.1	Joe Camp		11/12/2025
See Section 3.3.1	Joe Howell		11/12/2025
See Section 3.3.1	John Jacobsen		11/12/2025
See Section 3.3.1	Jonathan Beer		11/12/2025
See Section 3.3.1	Kathy Pham		11/12/2025
See Section 3.3.1	Maxwell VerKuilen		11/12/2025
See Section 3.3.1	Michael Dyer		11/12/2025
See Section 3.3.1	Michael Hankin		11/12/2025
See Section 3.3.1	Michael Sapunor		11/12/2025
See Section 3.3.1	Nicholas Coronado		11/12/2025
See Section 3.3.1	Robert Gibson		11/12/2025
See Section 3.3.1	Robert Gibson		11/12/2025
See Section 3.3.1	Zachary Fintel		11/12/2025
See Section 3.3.1	Alejandro Hernandez		11/13/2025
See Section 3.3.1	Alexander Przybyla		11/13/2025
See Section 3.3.1	Amy Hutto		11/13/2025
See Section 3.3.1	Ashley Almanza		11/13/2025
See Section 3.3.1	Brandon Flores		11/13/2025
See Section 3.3.1	Carlos Montalvan		11/13/2025
See Section 3.3.1	Damian Kevitt		11/13/2025
See Section 3.3.1	Daniel Gibbons		11/13/2025
See Section 3.3.1	Dave Ptach		11/13/2025
See Section 3.3.1	Ester Gonzalez		11/13/2025
See Section 3.3.1	Jack Lam		11/13/2025
See Section 3.3.1	javsolo@rocketmail.com		11/13/2025
See Section 3.3.1	Jennifer Gee		11/13/2025
See Section 3.3.1	Jennifer Staben		11/13/2025
See Section 3.3.1	Jill D'Agnenica		11/13/2025
See Section 3.3.1	Jorge Quezada		11/13/2025
See Section 3.3.1	Joshua McCorquodale		11/13/2025
See Section 3.3.1	Justin Morales		11/13/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Ken Wakita		11/13/2025
See Section 3.3.1	Martin Farfan		11/13/2025
See Section 3.3.1	Michelle Plochere		11/13/2025
See Section 3.3.1	Prescott Gadd		11/13/2025
See Section 3.3.1	Roy Orecchio		11/13/2025
See Section 3.3.1	Sara Wick		11/13/2025
See Section 3.3.1	Saul Mejia		11/13/2025
See Section 3.3.1	Seymour Amster		11/13/2025
See Section 3.3.1	Szi Kiat Lee		11/13/2025
See Section 3.3.1	Tany Ling (with 23 opposition letters attached)		11/13/2025
See Section 3.3.1	uburgara777@icloud.com		11/13/2025
See Section 3.3.1	William Frankenfeld		11/13/2025
See Section 3.3.1	Xavier Menifield (with 187 support letters attached)		11/13/2025
Public Hearing			
Comments Receiving Individual Response			
PH1	Helen Campbell		11/6/2025
PH2	Jon Christensen		11/6/2025
PH3	Tany Ling		11/6/2025
PH4	Sunjana Supekar		11/6/2025
PH5	Phyllis Ling		11/6/2025
PH6	Chinatown Residents		11/6/2025
PH7	Kenny Chan		11/6/2025
PH8	Robert Reyes Villagomez		11/6/2025
PH9	Karina Corbera		11/6/2025
PH10	Elena S.		11/6/2025
PH11	Charles Thomas		11/6/2025
General Comments Received at the Public Hearing			
See Section 3.3.1	Angela Capito		11/6/2025
See Section 3.3.1	Anna Corbera		11/6/2025
See Section 3.3.1	Antonio Alvarez		11/6/2025
See Section 3.3.1	Aro Z		11/6/2025
See Section 3.3.1	Aro Z		11/6/2025
See Section 3.3.1	Brenda Montes		11/6/2025
See Section 3.3.1	Carlos Navarrett		11/6/2025
See Section 3.3.1	Casey Wong		11/6/2025
See Section 3.3.1	Casey Wong		11/6/2025
See Section 3.3.1	Chinatown Resident (5)		11/6/2025
See Section 3.3.1	Craig Wong		11/6/2025
See Section 3.3.1	Danny Marzuka		11/6/2025
See Section 3.3.1	David Parra		11/6/2025
See Section 3.3.1	Diane Prozeller		11/6/2025
See Section 3.3.1	Diane Weiss		11/6/2025
See Section 3.3.1	Edith Gonzalez		11/6/2025
See Section 3.3.1	Edith Gonzalez		11/6/2025
See Section 3.3.1	Edward Flores		11/6/2025
See Section 3.3.1	Edwin Li		11/6/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Eric Adams		11/6/2025
See Section 3.3.1	Esmeralda		11/6/2025
See Section 3.3.1	Esther Gonzalez		11/6/2025
See Section 3.3.1	Faraz Aqil		11/6/2025
See Section 3.3.1	Gibson Mwangi		11/6/2025
See Section 3.3.1	Gisela Brigido		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Illegible Name		11/6/2025
See Section 3.3.1	Jelani Arriaga		11/6/2025
See Section 3.3.1	Jessica Wang		11/6/2025
See Section 3.3.1	Jessy Reed		11/6/2025
See Section 3.3.1	Jessy Reed		11/6/2025
See Section 3.3.1	Jimmy Blair		11/6/2025
See Section 3.3.1	Jin		11/6/2025
See Section 3.3.1	Joey Silva		11/6/2025
See Section 3.3.1	Jon Price		11/6/2025
See Section 3.3.1	Jon Pricing		11/6/2025
See Section 3.3.1	Jorge Quesada		11/6/2025
See Section 3.3.1	Julie Rico		11/6/2025
See Section 3.3.1	Julie Rico		11/6/2025
See Section 3.3.1	Junie Wong		11/6/2025
See Section 3.3.1	Junie Wong		11/6/2025
See Section 3.3.1	Layal Bata		11/6/2025
See Section 3.3.1	Lionel Mares		11/6/2025
See Section 3.3.1	Liz		11/6/2025
See Section 3.3.1	Marcy Romero		11/6/2025
See Section 3.3.1	Maria Cervantes		11/6/2025
See Section 3.3.1	Marian Dodge		11/6/2025
See Section 3.3.1	Mario Cervantes		11/6/2025
See Section 3.3.1	Mark Lomali		11/6/2025
See Section 3.3.1	Mark Lomeli		11/6/2025
See Section 3.3.1	Mary Martinez		11/6/2025
See Section 3.3.1	Meika Best		11/6/2025
See Section 3.3.1	Michael Torres		11/6/2025
See Section 3.3.1	Monica		11/6/2025
See Section 3.3.1	Morena Martelli		11/6/2025
See Section 3.3.1	Norma Virgen		11/6/2025
See Section 3.3.1	Patrick Chen		11/6/2025

Comment Number	Name	Organization	Date of Comment
See Section 3.3.1	Patrick Chen		11/6/2025
See Section 3.3.1	Philip Murphy		11/6/2025
See Section 3.3.1	Phyllis Chu		11/6/2025
See Section 3.3.1	Raina Dominguez		11/6/2025
See Section 3.3.1	Ray Wu Corpus		11/6/2025
See Section 3.3.1	Rebecca		11/6/2025
See Section 3.3.1	Rebecca Hernandez		11/6/2025
See Section 3.3.1	Richard Crook		11/6/2025
See Section 3.3.1	Robert Dominguez		11/6/2025
See Section 3.3.1	Ron Frank		11/6/2025
See Section 3.3.1	Ron Krueper		11/6/2025
See Section 3.3.1	Rory Hayes		11/6/2025
See Section 3.3.1	Rory Hayes		11/6/2025
See Section 3.3.1	Sakae Koyama		11/6/2025
See Section 3.3.1	Steven Martinez		11/6/2025
See Section 3.3.1	Steven Martinez		11/6/2025
See Section 3.3.1	Susan Lai		11/6/2025
See Section 3.3.1	Susan Lai		11/6/2025
See Section 3.3.1	Tavaso Ozawa		11/6/2025
See Section 3.3.1	Terry Anglin		11/6/2025
See Section 3.3.1	Tochil Banzanilla		11/6/2025
See Section 3.3.1	Tochil Banzanilla		11/6/2025
See Section 3.3.1	Veronica Soto		11/6/2025
See Section 3.3.1	Xinyang		11/6/2025
See Section 3.3.1	Yesenia Lio		11/6/2025
Note: Several emails were received from Adriana Martinez throughout the public comment period where Ms. Martinez forwarded emails of individuals' comment to LAART@metro.net, resulting in duplicate records. This table excludes the duplicate records forwarded by Ms. Martinez.			

3.2 Topical Responses

3.2.1 Topical Response 1: Comment Is Outside the Scope of the SEIR

Several comments received during the Draft SEIR's public review period raised issues regarding the original LA ART EIR that fall outside the scope of this supplemental analysis. The Draft SEIR was prepared specifically to address the Court Opinion regarding the adequacy of the LA ART EIR's construction noise mitigation analysis. In accordance with the Court Opinion, the Draft SEIR provides additional consideration of the feasibility of retrofitting existing buildings to mitigate significant construction noise impacts and provides additional discussion and analysis of and revisions to MM-NOI-A (requiring preparation of a Construction Noise Management Plan) to ensure CEQA compliance. Also, in accordance with the Court Opinion, Metro requested timely consultation with SMMC regarding issues within the Conservancy's trustee responsibilities, which is described in Topical Response 2, *Request for Consultation with the Santa Monica Mountains Conservanc*y.

Some commenters assert that the Draft SEIR mischaracterizes the Court Opinion. Metro disagrees. The Draft SEIR accurately summarizes the Court Opinion and includes a direct link to the full Opinion so that readers may review the Court's analysis in its entirety. The Court Opinion and writ of mandate (Writ),[1] which was issued on November 5, 2025, require Metro to: vacate its prior certification of the LA ART EIR and related CEQA findings and approvals; evaluate and reconsider construction-noise mitigation consistent with the Court of Appeal's decision; request consultation with SMMC within a reasonable statutory timeframe; and prepare, circulate, and certify a supplemental EIR incorporating this corrective work before reconsidering the Project for approval. Metro must also file returns to the Writ demonstrating compliance within deadlines identified in the Writ. Neither the Court Opinion, Writ, nor CEQA generally precluded Metro from addressing the construction noise issues the Court Opinion directed Metro to address in a supplemental EIR before decertifying the prior EIR. Commenters' suggestions to the contrary are incorrect.

Other comments take issue with the Draft SEIR's description of the Court Opinion as having "affirmed in part and reversed in part" the Superior Court's judgment. This phrasing reflects the practical outcome of the litigation and summarizes the decision in a way that is clear and accessible to the general public. In CEQA litigation, both the Superior Court and the Court of Appeal independently review the lead agency's decision under the same standard of review. Here, petitioners advanced numerous CEQA claims challenging multiple aspects of the LA ART EIR. The Superior Court rejected all of those claims, and the Court of Appeal rejected nearly all of them as well, identifying error only with respect to construction noise mitigation and the need to request timely consultation with SMMC. All other portions of the LA ART EIR's environmental analysis remain valid and beyond judicial challenge. The LA ART EIR, therefore, remains unchanged except for the supplemental construction noise analysis and where necessary to address any changed circumstances or new information.

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[1] A peremptory writ of mandate, also known as a writ of mandamus, is a legal order issued by a court that requires a government agency, public official, or lower court to perform a certain act or duty that the person or entity is legally obligated to perform. (See Cal. Code Civ. Proc., §§ 1085, 1094.5.) A writ may not compel a public agency to exercise discretion in a particular manner; it may only compel the agency to exercise its discretion in some manner. (A*IDS Healthcare Foundation v. Los Angeles County Dept. of Public Health* (2011) 197 Cal.App.4th 693, 700–701; see also Pub. Resources Code, § 21168.9(c) ["Nothing in this section [of CEQA] authorizes a court to direct any public agency to exercise its discretion in any particular way"].)

The Draft SEIR's summary accurately reflected that outcome and did not limit the public's ability to provide comments on any topic. Consistent with CEQA Guidelines Sections 15088.5(f) and 15062, Metro appropriately encouraged commenters to focus on the supplemental analysis of construction noise mitigation presented in Section 3.0 of the Draft SEIR because that is the only portion of the EIR reopened for additional review. This approach is standard for limited supplemental EIRs prepared on remand and is consistent with CEQA's remedy provisions[2], which grant courts continuing jurisdiction to determine whether the lead agency has complied with the specific corrective actions ordered. The court's limited jurisdiction on remand does not permit new challenges to issues that could have been raised previously or that were resolved in the prior litigation. (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 480.) "[A]ny challenge to an EIR or other agency action arising from facts in existence before the entry of judgment must be asserted in the proceeding before the entry of judgment. The failure to assert such a challenge before the entry of judgment or the failure to successfully appeal the judgment on an issue arising from facts in existence before the entry of judgment precludes a party from asserting the challenge in connection with postjudgment proceedings concerning compliance with the writ." (*Id.* at p. 481.)

Metro nevertheless accepted all comments, included the comments in this Final SEIR, directed the commenters to the Response to General Comments on the Draft SEIR contained in Section 3.3.1, and provided the comments to the decisionmakers. Individualized responses have been prepared for comments on issues within the scope of the Draft SEIR, as well as for comments that, while outside the scope, provided potentially new environmental information. Comments on issues addressed in the LA ART EIR and upheld in the Court Opinion, or that could have been raised in the previous litigation but were not, cannot now be used to reopen settled matters.

The following subsections of this Topical Response provide general responses to comments that raised issues about the LA ART EIR or the Project that fall outside the scope of the Draft SEIR and the Court Opinion, but nevertheless raise environmental or other substantive issues related to the Project. These responses are intended to help the public and decisionmakers understand where and how the LA ART EIR addressed those topics, even though CEQA does not require them to be revisited in this SEIR. Each subsection summarizes the relevant portions of the prior environmental analyses and directs readers to the appropriate sections of the LA ART Draft EIR, Final EIR, and Final EIR Errata for more detailed information. As used in the following subsections in this Topical Response, "EIR" refers to the "LA ART EIR." Not every substantive and environmental issue outside the scope of the Draft SEIR and related to the Project is summarized below. For additional information about the Project beyond what is included below or in this Final SEIR, readers should consult the LA ART Draft EIR, Final EIR, and Final EIR Errata, all of which are and have been available on Metro's website at https://www.laartsb44.net.

<u>*Aesthetics*</u>

Aesthetics Impacts Would Be Less than Significant. Refer to Section 3.01, *Aesthetics*, and Appendix C, *Visual Impact Assessment*, of the Draft EIR, for discussions of the aesthetic impacts of the proposed Project. The proposed Project's aesthetic impacts would be less than significant. The Draft EIR's analysis of impacts to aesthetics was prepared by experts in their respective fields, as set forth in Section 8.0, *List of Preparers*, of the Draft EIR.

[2] Public Resources Code, § 21168.9.

Key Observation Points. Refer to Section 3.01, *Aesthetics*, and Appendix C, *Visual Impact Assessment*, of the Draft EIR, for a discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Key Observation Points (KOPs) critical or representative of the visual character of the area were identified within each Landscape Unit (LU) and utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. KOPs within each LU were selected based on knowledge of important viewsheds and through consultation with responsible agencies. KOPs selected for simulation appear larger and more distinct than visual elements farther in the distance even though the foreground element may be of a smaller dimension, consistent with how pedestrians experience their surrounding environment. Further, visual simulations were created to reflect the proposed Project components within the existing landscape and, as such, included the existing landscape planting, buildings, and other visual elements such as open space resources, trees, and building frontages as they existed at the time the photos were taken. Refer to Appendix C, *Visual Impact Assessment*, of the Draft EIR for a detailed discussion about the implementation and results of the visual simulation. Refer to Appendix H.2, *Supplemental KOPs in Response to Comments*, of the Final EIR for additional visual simulations of the proposed Project, including simulations provided for additional clarity regarding certain design elements of the proposed Project. Refer to Appendix H.1, *Memo Regarding Preparation of View Simulations*, of the Final EIR, for a discussion of how the view simulations were prepared.

Key Observation Points from within the Los Angeles State Historic Park. The Draft EIR addressed aesthetic impacts in Section 3.01, *Aesthetics*, with supporting data provided in Appendix C, *Visual Impact Assessment,* of the Draft EIR. The Draft EIR and Visual Impact Assessment both specifically addressed and disclosed potential impacts on changes in the visual environment and existing viewsheds into and from within the Los Angeles State Historic Park. The Draft EIR included thirty KOPs, including nine that simulated views of or from Los Angeles State Historic Park. The Draft EIR analyzed each of these KOPs, describing the existing viewpoint along with a visual simulation of the proposed Project. With respect to views from within the park, the Draft EIR concluded that certain southwest-facing views of the downtown Los Angeles skyline, particularly close to the proposed Chinatown/State Park Station, would be partially interrupted due to the proposed Project. However, the Draft EIR noted that these views are already partially interrupted by trees and intervening development, and the nature of the proposed Project (i.e., cables with similar characteristics to existing powerlines and cabins that are constantly moving in and out of view) means that the proposed Project would not significantly impact views from the park. The visual analysis also takes into account the movement of the cabins, which minimizes the potential aesthetic impacts. The Draft EIR concluded that the proposed Project would not adversely impact or interfere with key viewpoints or the visual character of the park. The Project Sponsor added additional KOPs to further analyze viewshed impacts to Los Angeles State Historic Park. Refer to Appendix H.1, *Memorandum Regarding Preparation of KOPs*, and Appendix H.2, *Supplemental KOPs in Response to Comments*, of the Final EIR. The supplemental KOPs demonstrated that views from the Los Angeles State Historic Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views. In addition, Appendix H.2, *Supplemental KOPs in Response to Comments*, of the Final EIR provided visual simulations of views from a proposed Project cabin over the park, providing a new and unique perspective of the park and its surroundings, including the Roundhouse Observation Deck and the exposed Zanja Madre, which is currently not visually apparent from inside the park.

Consistency with Los Angeles State Historic Park General Plan. Refer to Section 3.01, *Aesthetics*, and Appendix C, *Visual Impact Assessment*, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Specifically, as it pertains to Los Angeles State Historic Park, pages 3.1-15 and 3.1-33-35 of the Draft EIR note that while there are no designated scenic vistas within the Project area, the open views of the park, as well as the view of the downtown Los Angeles skyline, make the park "visually memorable." As discussed in Section 3.01, *Aesthetics*, and Appendix C, *Visual Impact Assessment*, of the Draft EIR, valuable scenic or panoramic views, such as the open space in the park and the view of the downtown Los Angeles skyline, would only face localized impacts and that views would still be available from other more prominent locations. As such, the Draft and Final EIR determined that impacts to scenic or panoramic views would be less than significant. Refer to Appendix C, *Visual Impact Assessment*, of the Draft EIR for a detailed discussion about the implementation and results of the visual simulation of the proposed Project using KOPs critical or representative of the visual character of the area within each Landscape Unit (LU) utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. Refer to Appendix H.2, *Supplemental KOPs in Response to Comments*, in the Final EIR for additional visual simulations of the proposed Project, including at Los Angeles State Historic Park. Refer to Response S2-5 of the Final EIR for a discussion of the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics.

Views from within the Los Angeles State Historic Park. Refer to Section 3.01, *Aesthetics*, and Appendix C, *Visual Impact Assessment*, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Specifically, as it pertains to Los Angeles State Historic Park, pages 3.1-15 and 3.1-33-35 of the Draft EIR note that while there are no designated scenic vistas within the project area, the open views of the park, as well as the view of the downtown Los Angeles skyline, make the park "visually memorable." As discussed in Section 3.01, *Aesthetics*, and Appendix C, *Visual Impact Assessment*, valuable scenic or panoramic views, such as the open space in the park and the view of the downtown Los Angeles skyline, would only face localized impacts and that views would still be available from other more prominent locations. As such, impacts to scenic or panoramic views would be less than significant.

Viewer Groups. Refer to Section 3.01, *Aesthetics*, and Appendix C, *Visual Impact Assessment*, of the Draft EIR, for a discussion of the aesthetic impacts of the proposed Project, which would be less than significant. A series of visual simulations were conducted from/within Landscape Units (LU) and KOPs that were delineated and identified based on known significant views and locations with proposed changes to the setting. Viewer groups potentially affected by the proposed Project were identified in each LU as set forth in Table 3.01-6 of the Draft EIR. For example, viewer groups identified for LU 4, which includes the park are: motorist, transit commuter, pedestrian, and recreationalist. Because visual impacts under the L.A. CEQA Thresholds Guide are assessed based on changes to public views, description of resident viewer groups was provided only for informational purposes as private views from residential properties are not protected under the L.A. CEQA Thresholds Guide. This description of resident viewer groups for informational purposes only was provided with the understanding that, even within different viewer groups, visitors and residents likely hold unique values regarding the significance of views within/of each individual LU, and the significance of an impact is not based solely on a project's visibility from public viewpoints. In the evaluation of aesthetics, the Draft EIR analysis considers a range of qualifying factors consistent with methods and guidance provided by the Federal Highway Administration (FHWA) for evaluating visual impacts, as well as the CEQA Guidelines and City of Los Angeles CEQA thresholds.

Tower Aesthetics. Refer to Section 2.0, *Project Description*, of the Draft EIR, for discussion of the location and design of the Alameda Tower, Alpine Tower, and Stadium Tower. Refer to Section 3.1, *Aesthetics*, and

Appendix C, *Visual Impact Assessment*, of the Draft EIR, for discussion of the aesthetic impacts of the proposed Project's towers, which would be less than significant, and for visual simulations of the proposed Project's towers. The Alameda Tower's modern architectural style is evident and would complement the buildings within The California Endowment's campus. The neutral light-tone gray color scheme of Alameda Tower was designed for consistency with the surrounding urban environment, and to not distract from visually distinct structures such as the United States Post Office Terminal Annex building. Alpine Tower would consist of a neutral light-tone gray color scheme that would provide visual lightness to the form, and their design would complement the existing buildings in this area, as well as not distract from the visually distinct Chinese architecture within this area. Stadium Tower would consist of an architectural design that provides visual lightness to the form to complement the existing buildings in this area. In addition, the neutral light-tone gray colors and material finishes of the Stadium Tower were selected to complement the surrounding urban environment in LU-6, and to not distract from existing visually distinct structures, such as Dodger Stadium. Refer to Topical Response C, *Project Features*, of the Final EIR, discussing how the proposed Project's design takes cues from the immediate neighborhood culture, including how each component of the proposed Project would be designed to complement and reflect the unique character of the surrounding area.

Signage and Lighting. Refer to Topical Response K, *Signage and Lighting*, of the Final EIR, for discussion of the proposed Project's signage and lighting, with additional technical detail and information provided in the Lighting Study, which is included in Appendix C, *Visual Impact Assessment*, of the Draft EIR. As discussed in Section 3.1.6 of the Draft EIR, the proposed Project would implement AES-PDF-A, *Project Lighting*, which identifies the project features included in the proposed Project that would reduce nighttime light trespass by identifying specific building, outdoor lighting, and sign lighting restrictions.

Biological Resources

Biological Resources. Refer to Section 3.04, *Biological Resources*, and Appendix E, *Biological Resources Assessment*, of the Draft EIR and Appendix G, *Supplemental Biological Resources Report*, of the Final EIR for discussion of how impacts to biological resources from construction and operations of the proposed Project would be less than significant.

Bird Strikes and Mortality. Refer to Section 3.04, *Biological Resources*, and Appendix E, *Biological Resources Assessment*, of the Draft EIR and Appendix G, *Supplemental Biological Resources Report*, of the Final EIR for discussion of how the risk of avian collisions with the cables or components of the proposed Project is expected to be less than significant. Design features of the proposed Project (e.g., the lack of shield wires, the inclusion of slack carriers, presence of moving gondola cabins, and vinyl window film) are likely to reduce the risk of avian collisions in comparison to transmission lines.

Tree Replacement Ratios. Refer to Section 3.04, *Biological Resources*, and Appendix E, *Biological Resources Assessment*, of the Draft EIR and Appendix G, *Supplemental Biological Resources Report*, of the Final EIR. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. Refer to Table 4-1 of Appendix G, *Supplemental Biological Resources Report*, of the Final EIR for discussion of applicable tree replacement requirements in the City of Los Angeles. As shown in this table, protected trees require a replacement ratio of 4:1, while significant trees require a mitigation ratio of 1:1. Removed "street trees" that occur in the public right-of-way (ROW) are to be replaced at a ratio specified by the Urban Forestry Division; typically, at a 2:1 ratio. As discussed on page 3.04-23, in Section 3.04, *Biological Resources*, of the Draft EIR, it is anticipated that mitigation ratios for trees on land administered or managed by responsible agencies would be agreed to as part of the approvals required for implementation of the proposed Project. The proposed Project would provide a minimum replacement ratio of 1:1 for all trees removed in the Los Angeles State Historic Park and a replacement ratio of 1:1 for all large trees removed in the State Route (SR) 110 California Department of Transportation (Caltrans) ROW.

Night Lighting. Refer to Section 3.1.2 of Appendix G, *Supplemental Biological Resources Report*, of the Final EIR for discussion of why light in the vicinity of the proposed Project is not anticipated to attract nocturnal migrant birds.

Elysian Park. Refer to Section 3.01, *Aesthetics*, of the Draft EIR for discussion of why the proposed Project would not result in aesthetic impacts to Elysian Park. The proposed Project and Elysian Park are located in a developed, urban area with a high amount of existing ambient lighting. A Lighting Study included in Appendix C, *Visual Impact Assessment*, to the Draft EIR confirmed that the proposed Project's lighting would result in less than significant impacts to surrounding areas. Additionally, the proposed Project will incorporate Project Design Feature AES-PDF-A to further minimize daytime and nighttime lighting impacts. Refer to Section 3.04, *Biological Resources*, of the Draft EIR for a discussion of the proposed Project's potential impacts on wildlife, including how the proposed Project is not anticipated to have an indirect impact on bird and bat species due to proposed Project lighting. Refer to Appendix G*, Supplemental Biological Resources Report*, of the Final EIR for discussion of how the lighting associated with the proposed Project would be minimal, contributing only negligibly to the ambient light in this urban environment.

Bat Collisions. Refer to Section 3.04, *Biological Resources*, and Appendix E, *Biological Resources Assessment*, of the Draft EIR and Appendix G, *Supplemental Biological Resources Report*, of the Final EIR for discussions of why the proposed Project is not anticipated to contribute to an increase in bat collisions.

Monarch Butterflies. Refer to Appendix F, *Memorandum on Monarch Butterflies*, to the Errata to Final EIR and Appendix G, *Supplemental Biological Resources Report,* to the Final EIR for a discussion of why the proposed Project would not result in impacts to monarch butterflies nor suitable habitat for monarch butterflies.

Cultural Resources

Historic Resources. The proposed Project's potential impacts to historic resources are addressed in Section 3.5, *Cultural Resources*, of the Draft EIR, with supporting data provided in Draft EIR Appendix G, *Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR)*. As concluded in Section 3.5, *Cultural Resources*, of the Draft EIR, the proposed Project's potential impacts related to historical resources would be less than significant.

Archaeological Resources. The proposed Project's potential impacts to archaeological resources are addressed in Section 3.5, *Cultural Resources*, of the Draft EIR, with supporting data provided in Draft EIR Appendix F, *Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project*. As concluded in Section 3.5, *Cultural Resources*, of the Draft EIR, the proposed Project's potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with implementation of mitigation measures CUL-A through CUL-E.

Historic Resources in the Vicinity of the Alameda Station. Refer to Section 3.5, *Cultural Resources*, of the Draft EIR for a discussion outlining the proposed Project's potential construction and operational impacts to historic resources within the vicinity of the proposed Alameda Station, including the Los Angeles Union Station Passenger Terminal and Grounds and the Los Angeles Plaza Historic District (referred to as El Pueblo, and comprised of 29 resources within its boundaries, including the Avila Adobe and The Winery), the *El Grito* mural, and the Los Angeles Terminal Annex Post Office. As discussed in Section 3.5, *Cultural Resources*, the Draft EIR's analysis concludes that all potential impacts related to historical resources would be less than significant, and all potential impacts related to archaeological resources would be either less than significant or reduced to less than significant with mitigation.

Cultural Resources at the Los Angeles State Historic Park. Refer to Section 3.5, *Cultural Resources*, and Appendix F, *Archaeological and Paleontological Resources Assessment for the Los Angeles Aerial Rapid Transit Project*, of the Draft EIR for a discussion of archaeological resources at the Los Angeles State Historic Park. As discussed in Section 3.5, *Cultural Resources*, of the Draft EIR, the Chinatown/State Park Station footprint is entirely located within the boundary of Resource 19-003120 (consisting of the remains of the Southern Pacific Railroad's River Station). Extensive archaeological work has been conducted at the site, and when the Chinatown/State Park Station (including the construction staging area) is overlaid on an archaeological sensitivity map developed by California State Parks, it appears that the Chinatown/State Park Station is located in an area not identified as low sensitivity for archaeological resources by State Parks. Nevertheless, with the implementation of mitigation, construction of the proposed Chinatown/State Park Station would result in a less than significant impact related to a substantial adverse change in the significance of archaeological Resource 19-003120.

Chavez Ravine. Refer to Section 5.0, *Corrections and Additions*, of the Final EIR for a discussion of Chavez Ravine.

<u>*Greenhouse Gas Emissions*</u>

Zero Emissions and Green Power Program. Refer to Section 2.0, *Project Description*, of the Draft EIR, for discussion of how the proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, pursuant to GHG-PDF-A.

Alternative Transportation Technology. As discussed in the Technology Penetration Analysis, included in Appendix J, *Greenhouse Gas Emissions Technical Report*, of the Draft EIR, a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system. The proposed Project would exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and would show that new technology can successfully operate in concert with other existing modes of transportation.

Carbon Sequestration. Response to Comment S1-8 in the Final EIR explains that, while short-term losses in carbon sequestration may occur due to the removal of trees, the proposed Project would implement BIO-PDF-F and would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located. Accordingly, the short-term losses in carbon sequestration would occur only in the interim as replacement trees grow to the size of the existing trees. Over time, replacement trees would obtain similar carbon sequestration benefits as the existing trees, while the proposed Project as a whole would result a net decrease of approximately 6,375 metric tons of CO_2e per year in GHG emissions.

<u>Land Use</u>

Local and Emergency Access. Refer to Section 3.11, *Land Use*, and Section 3.17, *Transportation*, of the Draft EIR, for discussion of how multimodal access—for both local and emergency response—to local businesses, neighborhoods, LAUS, and the Los Angeles State Historic Park would be maintained throughout construction of the proposed Project, and disruptions to local businesses would be minimized.

Los Angeles State Historic Park General Plan Amendment. Refer to Section 3.11, *Land Use and Planning*, of the Draft EIR, for a discussion of the proposed Project's consistency with the Los Angeles State Historic Park General Plan. As discussed there, State Parks determined that the proposed Project would be inconsistent with the Los Angeles State Historic Park General Plan because the identified land uses in the General Plan's Preferred Park Concept Elements did not contemplate a transit station like the proposed Project's Chinatown/State Park Station. State Parks considered this inconsistency a potentially significant impact. Therefore, Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. The General Plan Amendment is subject to review and approval by the State Park and Recreation Commission, which retains its independent authority related to the proposed Project per Public Resources Code Section 21174. Refer to Topical Response F, *Los Angeles State Historic Park*, of the Final EIR, for a discussion of the Los Angeles State Historic Park General Plan Amendment.

<u>Noise</u>

Operational Noise Impacts. Refer to Section 3.13, *Noise*, and Appendix M, *Noise and Vibration Technical Report*, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project. Operational noise impacts would be less than significant. Table 3.13-26 summarizes operational noise impacts for the worst-case operational scenario which includes potential impacts from cabin noise as the gondolas travel between and within the stations, towers, and junction. To provide a conservative operational noise analysis, the worst-case scenario was selected which represents a Dodger Game Day, with the highest line speed, cabins per hour, and queuing numbers, and with nighttime operations. Tables 3.13-22, 3.13-23, and 3.13-24 on pages 3.13-53 to 3.13-57 of Section 3.13, *Noise and Vibration*, of the Draft EIR demonstrate that operational noise impacts would be less than significant at all receptor locations based on the L.A. CEQA Thresholds Guide, FTA, and LAMC. In addition to the primary operational noise levels evaluated in the Draft EIR, the noise generated inside cabins was also evaluated separately, as demonstrated in Table 3.13-25 on page 3.13-57 of the Draft EIR. The cabin noise would not result in a contribution to cumulative noise levels because NOI-PDF-A ensures that the cabins would be designed such that they would generate noise levels of at least 10 dBA below the current background levels.

Noise Impacts to Los Angeles State Historic Park. Refer to Section 3.13, *Noise and Vibration*, and Appendix M, *Noise and Vibration Technical Report*, of the Draft EIR for discussion of the construction and operational noise impacts from the proposed Project, including in the Los Angeles State Historic Park, identified in the evaluation of noise impacts as Noise Sensitive Receptors (NSR) 14N and 14S. As detailed therein, construction related noise impacts at NSR-14N and NSR-14S would be significant and unavoidable even with implementation of mitigation, and operational noise impacts would be less than significant.

Cabin Noise. Refer to Section 3.13, *Noise and Vibration*, and Appendix M, *Noise and Vibration Technical Report*, of the Draft EIR, for discussion of the operational noise impacts from the proposed Project. The impact analysis included an evaluation of potential operational noise impacts resulting from the cabins passing close by occupied buildings, including sensitive uses. As noted on page 3.13-57 of the Draft EIR, an analysis was conducted to evaluate the noise from the gondola cabins as they travel between the stations, towers and junction in proximity to receptor locations. Cabin noise might be expected from the people traveling inside the cabin and any heating, ventilation and air conditioning (HVAC) equipment associated with the cabin. The proposed Project would implement project design feature NOI-PDF-A that provides specifications regarding the interior-to-exterior noise reduction of the gondola cabins as well as the sound power level of the HVAC system. Refer to Response to Comment G017-127 in the Final EIR for discussion of operational noise impacts associated with sleep disturbance, which includes an analysis that uses the Sound Exposure Level (SEL) acoustics metric. As identified therein, operational noise impacts associated with sleep disturbance would be less than significant.

Noise-Related Human Health Impacts. Refer to Section 3.13, *Noise and Vibration*, and Appendix M, *Noise and Vibration Report*, of the Draft EIR for discussion of the evaluation of noise-related human health impacts from the proposed Project. Construction-related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant. Refer to Response to Comment G017-126 and Response to Comment G017-127 in the Final EIR for discussion of the proposed Project's less than significant impact on human health associated with hearing loss, hearing damage, and sleep disturbance.

Construction Vibration Impacts. Refer to Section 3.13, *Noise and Vibration*, and Appendix M, *Noise and Vibration Technical Report*, of the Draft EIR, for discussion of the vibration impacts from construction of the proposed Project. Vibration impacts associated with the proposed Project were analyzed in the Draft EIR both for building damage and human annoyance. With implementation of Mitigation Measure VIB-A and VIB-B during construction of Alameda Station, potential vibration damage impacts at the Avila Adobe, the Old Winery, and El Grito Mural, would be less than significant. Construction of the proposed Project would result in significant and unavoidable human annoyance impacts during construction of the proposed Project. Refer to Section 2.8, *Construction*, and Appendix B, *Construction Assumptions*, of the Draft EIR, for discussion of the duration of construction for each component of the proposed Project.

Transportation

Project Transportation, Air Quality, and GHG Benefits. The proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel are discussed in Section 3.03, *Air Quality*, Section 3.08, *Greenhouse Gas Emissions*, Section 3.17, *Transportation*, Appendix D, *Air Quality/Health Risk Assessment Technical Report*, Appendix J, *Greenhouse Gas Emissions Technical Report*, and Appendix N, *Transportation Appendices*, of the Draft EIR, as well as in several Topical Responses and responses to individual comments contained in the Final EIR. As explained on pages 6.0-79 to 6.0-80 of the Final EIR, the proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. Given the capacity of the gondola system, approximately 20 percent of stadium attendees could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. As noted on pages 6.0-31 to 6.0-32 of the Final EIR, over its operational lifetime, the proposed Project is expected to achieve a reduction of 166,653 MT of CO_2e and a VMT reduction of 129,629,500. The proposed Project would also result in a net reduction in criteria pollutant emissions by reducing vehicle miles travelled.

Connection to Regional Transit Hub at Los Angeles Union Station. Refer to Section 2.3.7, *Purpose and Need*, of the Draft EIR, for discussion of how the proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station.

Daily and Special Event Operations. Refer to Section 2.1, *Overview of the Project*, of the Draft EIR, for discussion of how the proposed Project would operate daily between 6:00am to 12:00am to serve existing residents, workers, park users, and visitors to Los Angeles. As discussed on page 2-42, in Section 2.0, *Project Description*, of the Draft EIR, the proposed Project would provide service to all pre-season, regular season, and post-season Los Angeles Dodger games and any special events (e.g., concerts, the Los Angeles Marathon) at the Dodger Stadium property. The proposed Project would also provide service to events at the Los Angeles State Historic Park. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, under the Community Access Plan, residents, employees, and businesses located close to the proposed Project would be able to ride the gondola using their Metro fare at no additional cost. Refer to Section 2.6, *Ridership*, of the Draft EIR for a discussion of how the proposed Project would be configured to accommodate anticipated ridership for Dodger games and special events at Dodger Stadium, events at the Los Angeles State Historic Park, commuters and residents in adjacent neighborhoods, and visitors to Los Angeles. The proposed Project would have flexibility to operate at varying speeds and capacities depending on ridership demand.

Project Increases Transit Ridership. Refer to Topical Response H, *The Draft EIR Considered an Appropriate Range of Alternatives and Design Options*, of the Final EIR, for discussion of how, relative to other alternatives, the proposed Project would improve the connection between LAUS and Dodger Stadium by providing the quickest, most frequent, and highest capacity transit connection for the greatest number of riders. The proposed Project would enable more travel time-competitive transit trips from more locations in the region.

Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation. Refer to Topical Response B, *Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation*, of the Final EIR, for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data, and the management of queuing at stations, and pre-game and post-game transportation.

Response to UCLA Mobility Lab Study. Refer to Topical Response O, *Response to UCLA Mobility Lab Study*, of the Final EIR, for detailed responses to the items in the Mobility Lab Study. The Mobility Lab Study was not submitted by its authors at the Mobility Lab as a comment on the Draft EIR, and does not appear to have been prepared for that purpose. As noted in the Final EIR, on January 13, 2023, the Mobility Lab issued the following statement regarding the Mobility Lab Study:

Statement from the UCLA Mobility Lab Regarding LA Gondola Ridership Projection

The UCLA Mobility Lab is an engineering and technology lab dedicated to scientific research and innovation around mobility technologies. The lab's data on projected transit ridership of a proposed Dodger Stadium gondola is preliminary in nature. More research would be necessary to draw conclusions about potential use of the gondola. The lab takes no view on whether the project should be built.
Jiaqi Ma
Director, UCLA Mobility Lab
Faculty Associate Director, UCLA Institute of Transportation Studies

Dodger Stadium Express. Refer to Topical Response O, *Response to the UCLA Mobility Lab Study*, of the Final EIR, for a discussion of how the proposed Project would not preclude continued operation of the Dodger Stadium Express. While some existing riders of the Dodger Stadium Express may choose to use the proposed Project to take advantage of its substantial travel time savings, others may prefer to ride the Union Station Dodger Stadium Express for other reasons. By improving connections to additional public transit options, the proposed Project is projected to increase the number of attendees traveling to games or events at Dodger Stadium by public transportation.

Transit Connection. Section 4.0, *Alternatives*, of the Draft EIR evaluated alternatives to the Project, including a No Project Alternative, a Spring Street Alignment Alternative, and a Transportation Systems Management (TSM) Alternative. As explained in Topical Response H, *The Draft EIR Considered an Appropriate Range of Alternatives and Design Options*, of the Final EIR, by improving the connection between LAUS and Dodger Stadium, the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium and would have the most travel time-competitive transit trips from more locations in the region. Unlike the proposed Project, the TSM Alternative would not provide a permanent transit connection as bus routes and operations are frequently modified and/or eliminated due to fiscal and ridership issues.

Queue Estimations. Refer to Topical Response B, *Ridership Model; Queuing at Stations and Pre-game and Post-game Transportation*, of the Final EIR for a discussion of queuing estimates. Due to the nature of queue formation, the pre-game/event passenger queues at the Alameda Station, the EIR estimated that 2026 queues would be largely contained on the platform and only minimally extend out into the planned LAUS Forecourt. More active queue management would become more frequently needed at Alameda Station as ridership increases toward the 2042 ridership projection of 10,000 riders, but even with the maximum queue length, a person at the end of the line would wait for an estimated maximum of seven minutes before boarding the gondola cabin. Others would wait shorter durations. In addition, post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Those seated the farthest from the Dodger Stadium Station would take more time to arrive at the Station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. The post-game/event queue for the proposed Project would be constantly moving as cabins would depart every 23 seconds. For additional information, see pages 6.0-38 to 6.0-42 of the Final EIR.

Timed Tickets. Refer to Topical Response B, *Ridership Model; Queuing at Stations and Pre-game and Post-game Transportation*, of the Final EIR. Timed tickets would be employed to manage the arrival of passengers on expected large turnout days. On large turnout days, game or event attendees planning on riding the proposed Project would be required to reserve a ticket for a specific time slot in advance. This would spread out the passenger arrivals and assist with queue management. Timed tickets are regularly employed at locations such as museums, particularly on busy days like weekends and holidays, to manage crowds and queuing.

Post-game Operations. Refer to Topical Response B, *Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation*, of the Final EIR, for a discussion of post-game operations. Post-game queues at Dodger Stadium were estimated based on assumptions about the departure patterns and estimates of walk times from the various seating areas within the stadium. Based on current behaviors, game attendees gradually start leaving the game around 30 minutes before the end of the game. While most people would leave the stadium at the end of the game, given the crowd in the stadium and the distances from the various seating locations in the stadium, it would naturally take people seated the furthest away from the Dodger Stadium Station more time to walk to the station, much like how it is currently for passengers riding the Dodger Stadium Express. In addition, gondola passengers who would rather not join the line immediately to board the proposed Project in the post-game period could visit some of the entertainment amenities at the stadium, including at the Centerfield Plaza. Regarding the queue waiting time, Dodger Stadium Express riders today wait in queues to board the service. Queues to board, loading times, and travel times for the Dodger Stadium Express are significantly longer and more variable as compared to the proposed Project. In order to quantify the existing service time needed to transport Dodger Stadium Express riders, Fehr & Peers, the preparers of the EIR's transportation analysis, observed four post-game time periods during the 2023 season. These observations indicated that riders are willing to wait for substantial periods of time after a game to board the Dodger Stadium Express, despite its slower travel time and long waits between buses, supporting the concept that riders would also be willing to wait after a game to board the proposed Project with its improved level of service.

Traffic Congestion. Traffic congestion is not required to be analyzed under CEQA in an EIR following the implementation of Senate Bill 743, which designated "vehicle miles traveled" as the method for assessing transportation impacts on the environment for CEQA projects. Nonetheless, a report entitled *The Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment*, was prepared by Fehr & Peers and made available on the proposed Project's SB 44 website. The report found that there could be localized increases in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station due to some riders choosing to park and ride or take Uber/Lyft, and recommended the proposed Project work with Metro to identify a transit partnership to further encourage proposed Project riders to take transit, walk, or bike to the proposed Project's stations. This partnership could include providing a free connecting Metro or Metro bikeshare ride with a ticket for the proposed Project, or other measures to further encourage a complete transit trip. By providing efficient, high-capacity, and faster alternative access to Dodger Stadium for games and special events, however, overall vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days would be reduced by the proposed Project because of game/special event attendees shifting to riding public transit rather than driving to Dodger Stadium.

Parking. The *Los Angeles Aerial Rapid Transit Project Non-CEQA Transportation Assessment* included a Parking Study as an attachment. As described in the Final EIR, parking is not a required transportation analysis under CEQA and is also not required as part of the transportation analysis under the required non-CEQA transportation analysis per the Transportation Assessment Guidelines (TAG). However, as explained in Response to Comment GO17-176 in the Final EIR, parking is a key concern to the communities where proposed Project stations would be sited, as well as for decision makers. Therefore, the Parking Study was prepared to provide additional information about existing parking conditions and the proposed Project's potential to affect parking conditions around the Alameda Station and Chinatown/State Park Station. The Parking Study determined that even with the addition of proposed Project vehicles parking in the area studied, publicly available parking on a game day would still be substantial, with an estimated 43 percent parking occupancy across the two half-mile station walksheds, and over 3,900 off-street parking spaces available to the community. Nevertheless, the proposed Project would include a parking management plan prepared in collaboration with the City, who would implement any on-street parking management strategies. The parking management plan would include identification of specific partnerships with parking owners/operators and businesses. In addition, robust feedback from community stakeholders would inform development of the plan, to ensure the parking management plan is designed to alleviate any potential localized increase in traffic at the intersections closest to the proposed Project's Alameda Station and Chinatown/State Park Station.

Chinatown/State Park Station is Not Duplicative of Metro A Line (Blue).[3] Response to Comment GO8-21 in the Final EIR explained that, compared to the Metro A Line (Blue), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less.

Peer Review of the Draft EIR's Transportation Analysis. In preparing the Draft EIR, Metro retained Stantec to peer review the transportation analyses conducted for the proposed Project, including Section 3.17, Transportation, and Appendix N, Transportation Appendices of the Draft EIR. Stantec is an internationally-respected global design and delivery firm that provides transportation engineering and planning services among its many service lines. Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defensible, and appropriate to use for the analysis and agreed with the ridership forecasts in the Draft EIR.

Tourism. Refer to Appendix N, *Potential LA ART Tourist Ridership*, of the Draft EIR for information regarding the EIR's tourism ridership estimates. Tourism-related ridership was estimated based on an analysis prepared by HR&A, which assessed the potential for the proposed Project to capture a share of the tourism attraction market in the County of Los Angeles.

Tribal Cultural Resources

Assembly Bill 52. The Draft EIR analyzed Tribal Cultural Resources in Section 3.18, *Tribal Cultural Resources*. Metro consulted with California Native American Tribes in accordance with Assembly Bill ("AB") 52. On October 1, 2020, Metro sent letters inviting consultation to representatives of eight tribes pursuant to AB 52 on October 1, 2020. On October 14, 2020, Metro received a response from the Gabrieleno Tongva Indians of California Tribal Council outlining cultural resource monitoring recommendations. Metro sent an e-mail requesting a consultation meeting with the Tribe on November 9, 2020, and December 2, 2020,

[3] Subsequent to the release of the Draft EIR, on June 16, 2023, in connection with the opening of Metro's Regional Connector, Metro changed the name of the L Line (Gold). The part of the former L Line (Gold) between Little Tokyo/Arts District Station and APU/Citrus College station became part of the A Line (Blue), and the part of the former L Line (Gold) between Little Tokyo/Arts District Station and Atlantic Station became part of the E Line (Gold). The proposed Project area includes the part of the former L Line (Gold) that is now part of the A Line (Blue). References in the Draft EIR and Final EIR to the L Line (Gold) refer to the A Line (Blue).

but did not receive a response. On April 8, 2021, Metro held a teleconference consultation meeting with two tribal representatives of the Gabrieleno Band of Mission Indians - Kizh Nation. The Gabrieleno Band of Mission Indians - Kizh Nation sent a letter to Metro suggesting mitigation measures on September 21, 2021, which reopened the consultation. The Gabrieleno Band of Mission Indians - Kizh Nation also submitted letters to Metro on January 11, 2022, and February 23, 2024. Metro incorporated a number of the Tribe's suggested mitigation measures into Mitigation Measure TCR-A. On October 30, 2020, Metro received a response from the Fernandeño Tataviam Band of Mission Indians, stating that the proposed Project location was outside the ancestral boundaries of the tribe. Metro did not receive request for consultation from the Santa Rosa Band of Cahuilla Indians, Soboba Band of Luiseno Indians, Gabrieleno/Tongva Nation, Gabrielino-Tongva Tribe, or Gabrieleno/Tongva San Gabriel Band of Mission Indians. Metro mailed a letter to all eight tribes on July 2, 2021, notifying the tribes of the close of the consultation period prior to the release of the Draft EIR. On January 30, 2023, the Gabrieleno/Tongva San Gabriel Band of Mission Indians submitted a comment letter on the Draft EIR. Metro provided responses to that letter in the Final EIR (Responses to Comments S5-1 through S5-3). Refer to Topical Response 4, *No Project Changes, Changed Circumstances, or Significant New Information*, for a discussion of why reinitiation of tribal consultation is not required. Metro mailed the Notice of Availability of the Draft SEIR to the eight previously identified tribes. No Native American Tribes provided public comments on the Draft SEIR.

<u>*Alternatives*</u>

The Draft EIR Considered an Appropriate Range of Alternatives and Design Options. Refer to Topical Response H, *The Draft EIR Considered an Appropriate Range of Alternatives and Design Options*, of the Final EIR, and Section 4.0, *Alternatives*, of the Draft EIR, for a discussion of the Draft EIR's consideration of a range of reasonable alternatives, properly identifying an "environmentally superior" alternative and analyzing a "No Project" alternative, pursuant to CEQA.

Project Objectives. Refer to Topical Response H, *The Draft EIR Considered an Appropriate Range of Alternatives and Design Options*, of the Final EIR, for discussion of how the proposed Project's objectives were defined to assist Metro in considering alternatives that achieve the proposed Project's fundamental purpose of providing a permanent transit connection to Dodger Stadium. The proposed Project's objectives are not so narrow that they preclude consideration of reasonable alternatives – while alternatives for a project must be able to satisfy "most of the basic objectives of a project," alternatives should not be excluded simply because they would impede attainment of project objectives "to some degree." (CEQA Guidelines, § 15126.6(a)–(b).) The proposed Project's objectives broadly contemplate improving neighborhood connectivity and the Dodger Stadium visitor experience, reducing vehicle congestion and associated emissions in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, improving access to Elysian Park and the Los Angeles State Historic Park, and providing a sustainable form of transit. Aerial rapid transit technology has the ability to overcome grade and elevation issues between LAUS and Dodger Stadium in order to provide a direct transit connection between the two locations, and provide safe, zero emission, environmentally friendly, and high-capacity transit connectivity in the Project area that would reduce GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium and on neighborhood streets, arterial roadways, and freeways. Metro deemed it feasible to analyze an aerial gondola system as a permanent transit connection to Dodger Stadium. Thus, because the proposed Project's fundamental purpose is to provide a permanent transit connection to Dodger Stadium, and because aerial rapid transit technology can achieve this fundamental purpose, the objectives for the proposed Project are in compliance with CEQA, which does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives.

No Project Alternative. Refer to Topical Response H, *The Draft EIR Considered an Appropriate Range of Alternatives and Design Options*, of the Final EIR, for discussion of how the No Project Alternative would not meet any of the Project objectives and would not provide the proposed Project's environmental benefits, such as reducing vehicle miles traveled, improving air quality through reduced emissions, lowering greenhouse gas emissions from vehicular travel, and implementing low impact development source control and best management practices to minimize runoff and water pollution.

Spring Street Alignment Alternative. Refer to Topical Response H, *The Draft EIR Considered an Appropriate Range of Alternatives and Design Options*, of the Final EIR, for discussion of how the Spring Street Alignment Alternative would require a larger footprint than the proposed Project within the Los Angeles State Historic Park and would result in additional sources of light, glare and shading.

Transportation Systems Management Alternative. Refer to Topical Response H, *The Draft EIR Considered an Appropriate Range of Alternatives and Design Options*, of the Final EIR, for discussion of how the TSM Alternative for an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and the Los Angeles State Historic Park. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.

Pedestrian Enhancement Alternative. Refer to Section 5.0, *Corrections and Additions*, of the Final EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort, and accessibility of walking between the Metro A Line (Blue) Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project.

South Bay Dodger Stadium Express. As discussed in Topical Response H, *The Draft EIR Considered an Appropriate Range of Alternatives and Design Options*, of the Final EIR, a system of buses from numerous remote locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses. Similar to expanding existing Dodger Stadium Express service, this would result in a bus fleet that is either underutilized most of the time or would disrupt regular Metro bus service whenever a Dodger game or other stadium event is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses to and from remote locations and for paid idle time during games.

Buses traveling from multiple remote locations would also face rush hour congestion en route to Dodger Stadium. With limited regional facilities providing bus-only lanes that this service could utilize, it would not materially improve transit travel times compared with driving. For example, the current Dodger

Stadium Express service from South Bay serves a broad area of southern Los Angeles County at stations spread across eight miles, is free, and travels on a priority lane within the I-110 freeway median for most of its route. Nonetheless, the South Bay Dodger Stadium Express carried an average of only 415 passengers per game in 2019, compared with 1,895 riders per game on the LAUS Dodger Stadium Express.

Hollywood Bowl. As discussed in Topical Response H, *The Draft EIR Considered an Appropriate Range of Alternatives and Design Options*, of the Final EIR, a park-and-ride system similar to the system implemented at the Hollywood Bowl would require a substantial increase in the number of buses. As with the expanded Dodger Stadium Express concept, this would result in a fleet that is either underutilized most of the time or would disrupt regular Metro bus service whenever a Dodger game or other stadium event is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses to and from the park-and-ride locations, as well as for paid idle time during games. Buses traveling from multiple locations would also face rush hour congestion en route to Dodger Stadium. With limited regional facilities providing bus-only lanes that this service could utilize, it would not materially improve transit travel time compared with driving.

Other CEQA Considerations

Growth Inducing Impacts. The proposed Project would provide an additional transit option for surrounding residents in Chinatown, and as discussed in Section 3.14, *Population and Housing*, of the Draft EIR, is not anticipated to substantially generate new development.

Other

Significant and Unavoidable Impacts

Refer to Section 5.1, *Significant and Unavoidable Adverse Impacts*, of the Draft EIR, for discussion of the proposed Project's significant and unavoidable adverse impacts. Implementation of the proposed Project would result in temporary significant unavoidable impacts related to construction noise and vibration (human annoyance) and no feasible mitigation measures were identified to mitigate these impacts to a less-than-significant level. All other impacts analyzed in the EIR would be less than significant.

Los Angeles State Historic Park

Ability of Uses to Continue at the Park. As discussed in Section 2.0, *Project Description*, Section 3.16, *Parks and Recreational Facilities*, and Section 5.0, *Other CEQA Considerations*, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project alignment crosses over the westernmost edge of the Los Angeles State Historic Park, adjacent to the existing Metro A Line (Blue) and the associated overhead catenary system. As shown in Figure 5-2 of the Draft EIR, more than 30 of the park's 32 acres are not beneath the proposed Project's alignment. ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project's vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer. With the required clearances and the height at which the cabins would cross over the

Los Angeles State Historic Park, the ability to use the vast majority of the park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project.

Operational Impacts to the Park Would Be Less Than Significant. As discussed in Sections 3.01, *Aesthetics*, 3.04, *Biological Resources*, 3.05, *Cultural Resources*, 3.06, *Energy*, 3.07, *Geology and Soils*, 3.09, *Hazards and Hazardous Materials*, 3.10, *Hydrology and Water Quality*, 3.11, *Land Use and Planning*, 3.13, *Noise*, 3.15, *Public Services*, 3.16, *Parks and Recreational Facilities*, 3.17, *Transportation*, 3.18, *Tribal Cultural Resources*, 3.19, *Utilities and Service Systems*, 3.20, *Wildfire*, and 5.0, *Other CEQA Considerations*, the proposed Project would have less than significant operational impacts, including to Los Angeles State Historic Park.

Tree Removal and Replacement. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. As discussed on page 3.4-23, in Section 3.04, *Biological Resources*, of the Draft EIR, and in Appendix K.1, *Updated Tree Report*, and in Appendix G, *Supplemental Biological Resources Report*, of the Final EIR, the removal of the 75 trees within Los Angeles State Historic Park would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department. In addition, 6 trees within the public ROW located near the Los Angeles State Historic Park would be replaced at a ratio specified by the Urban Forestry Division, typically, at a 2:1 ratio.

Benefits to the Park. Refer to Section 3.16, *Parks and Recreational Facilities*, of the Draft EIR, for discussion of benefits to the Los Angeles State Historic Park. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro's A Line (Blue) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms.

Pedestrian Bridge. As discussed in Topical Response C, *Project Features*, of the Final EIR, while not proposed as part of the proposed Project, the Draft EIR included as Design and Use Option E an analysis of the park's proposed bike and pedestrian bridge. The bridge would provide important connections for students at Cathedral High School, as well as between the park and the Chinatown, Savoy, and Solano Canyon neighborhoods to support convenient access for the community. The analysis serves to provide environmental clearance for the bike and pedestrian bridge as a benefit to the Los Angeles State Historic Park, as while the bike and pedestrian bridge was mentioned in the Los Angeles State Historic Park General Plan and studied in the State Park's Bridge Feasibility Study, the bike and pedestrian bridge was never environmentally cleared. Support for the Los Angeles State Historic Park bike and pedestrian bridge would otherwise be provided as part of the proposed Project. Accordingly, the proposed Project is furthering the bike and pedestrian bridge by providing the necessary environmental clearance and support for the bridge.

SB 44

Refer to Topical Response A, SB 44, of the Final EIR, for discussion of the proposed Project's consistency with the requirements of Senate Bill (SB) 44.

Project Segmentation

No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property. Refer to Topical Response G, *No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property*, of the Final LA ART EIR, for a discussion of how the proposed Project solely proposes an aerial gondola system and was not improperly segmented or "piecemealed" from a larger development project at the Dodger Stadium property. The proposed Project does not include other development.

Lead Agency and Responsible Agencies

Metro is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies. Refer to Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies, of the Final EIR, for discussion of how Metro is the proper lead agency for the proposed Project because Metro has primary responsibility for implementation of the proposed Project as the region's transportation authority.

Responsible Agencies. Responsible agencies for the proposed Project were identified as the California Department of Transportation ("Caltrans"), the California Department of Parks and Recreation ("State Parks"), the California Division of Occupational Safety and Health ("Cal/OSHA"), and the City of Los Angeles. Refer to Topical Response D, *Metro Is the Proper Lead Agency for the Proposed Project As the Region's Transportation Authority; Metro Named and Consulted With the Applicable Responsible Agencies*, of the Final EIR, for discussion of the proposed Project's consultation with CEQA Responsible Agencies. Refer to Appendix A, *Scoping Report*, of the Draft EIR, and Appendix A, *Public Outreach Report*, of the Final EIR, for documentation of notice to Responsible Agencies at various stages in the environmental review process.

Project Features

Project Features. Refer to Topical Response C, *Project Features*, of the Final EIR, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including but not limited to the following:

- Sustainability features at the stations, towers, and junction and open space enhancements at the Los Angeles State Historic Park
- Community Access Plan to allow local residents and employees of businesses close to the proposed Project to ride the gondola using their Metro fare at no additional cost
- Pedestrian access enhancements along the proposed Project alignment, including landscape and hardscape improvements, shade structures, and potential seating
- Access to the Los Angeles State Historic Park and Elysian Park

- Mobility hubs at Chinatown/State Park Station and Dodger Stadium Station
- Wayfinding signage adjacent to and throughout the proposed Project alignment
- Utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture and history
- Design of the proposed Project components inspired by adjacent neighborhood culture and history
- Interpretation Plan to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community
- Marketing plans to help promote the adjacent business areas, while honoring the rich history and cultural significance of each area
- Business and Community Support Program during construction
- Partnerships with local businesses and nonprofits along the proposed Project alignment
- Commitment to a goal of utilizing at least 35 percent MBE/WBE/DBE/SBE/DVBE/LGBTQ-owned businesses during the proposed Project's construction phase

Project Labor Agreement. The proposed Project will enter into a Project Labor Agreement and will work in coordination with the Los Angeles/Orange Counties (LA/OC) Building and Construction Trades.

Free Ridership for Dodgers Game Attendees. Refer to Topical Response C, *Project Features*, of the Final EIR, for discussion of how the proposed Project would be free to ride for anyone with a ticket to a Dodgers game.

Need for Project. Refer to Section 2.3.7, *Purpose and Need*, of the Draft EIR, for an overview of the need for the proposed Project. The proposed Project would improve mobility and accessibility for the region by providing a daily, high-capacity aerial rapid transit connection between the regional transit system at LAUS, Dodger Stadium, Los Angeles State Historic Park, Elysian Park, and surrounding communities via the intermediate Chinatown/State Park Station. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year, but there are no permanent transit connections to the venue. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around Dodger Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. Given the capacity of the proposed Project's system, approximately 20 percent of the fans could take aerial transit connected to Metro's regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project would allow all residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost under the Community Access Plan.

Proposed Project Alignment and Components

Proposed Project Alignment and Components. Refer to Section 2.5, *Proposed Project Alignment and Components*, with supporting data provided in Appendix Q, *Proposed Alignment Plan and Profile*, of the Draft EIR for discussion of how the proposed Project maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties. Refer to Topical Response C, *Project Features*, of the Final EIR, for discussion of how the proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

Chinatown/State Park Station Location. Refer to Section 2.0, *Project Description*, of the Draft EIR, for discussion of how the proposed Project's intermediate Chinatown/State Park Station near the southernmost entrance to the Los Angeles State Historic Park would be located within a short walk to many Chinatown businesses and Metro's A Line (Blue), creating a strong connection with the Metro A Line (Blue) and enhancing transit access to the Los Angeles State Historic Park, Mission Junction, William Mead Homes, and the Los Angeles River. Compared to the Metro A Line (Blue), accessible at the Chinatown Station, the proposed Project's Chinatown/State Park Station would be closer to the Los Angeles State Historic Park, the shorter headways would result in more frequent service, and the travel time would be less. Due to the length and geometry of the proposed Project alignment, the Chinatown/State Park Station at its proposed location would support the proposed Project's objectives to maximize the proposed Project alignment along the public ROW and publicly owned property and minimize aerial rights requirements over private properties, taking into account existing and future adjacent land uses.

Aerial Rights Acquisition. As discussed in Section 2.0, *Project Description*, of the Draft EIR, the proposed Project was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. As described throughout the Draft EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Sections 2.5 of Section 2, *Project Description*, and 3.11.1, Figure 6-12 of Section 3.11, *Land Use and Planning*). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft SEIR.

Gondola Design and Operations

Gondola Design and Operations. Refer to Section 2.0, *Project Description*, of the Draft EIR and Topical Response J, *Gondola Design and Operations*, of the Final EIR, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project.

Aerial Transit Technology. Although forms of aerial transit technology have been available and utilized for the last 100 years, modern applications have seen the evolution of the technology as a feasible mode of urban rapid transit. As discussed in the Technology Penetration Analysis, included in Appendix J, *Greenhouse Gas Emissions Technical Report*, of the Draft EIR, a large capacity for a new mode of transportation in Los Angeles will allow passengers to see the potential for other emerging innovations to be integrated into the public transit system, and the proposed Project would thus exemplify how alternative transportation technology can be integrated into a city's transportation infrastructure and will show that new technology can successfully operate in concert with other existing modes of transportation.

Privacy. Refer to Topical Response M, *Comparable Urban Aerial Transit Systems*, of the Final EIR, discussing how, like the proposed Project, comparable aerial transit systems in cities around the world are integrated with their surrounding urban environments. In particular, comparable aerial transit systems in other locations demonstrate that such systems can operate safely, efficiently, and in concert with nearby residential and open space uses, including parks and other recreational facilities. The proposed Project would be located in a densely-populated, urban environment surrounded by a variety of commercial, industrial, and residential development types. In this type of environment, it is common for public transportation, such as Metro's light rail, to be located adjacent to residential uses and modern aerial transit systems in other cities, including Portland, Oregon and New York City, operate adjacent to residential uses. Nevertheless, as discussed in Topical Response J, *Gondola Design and Operations*, of the Final EIR, and Section 2.0, *Project Description*, of the Draft EIR, cabin windows can be equipped with privacy glass that can become opaque while adjacent to sensitive views, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. Considerations as to the locations along the proposed Project alignment where the privacy glass could be activated include the subject adjacent sensitive views and the vertical and horizonal distance between the proposed Project cabins and the adjacent sensitive views.

Safety and Security. Refer to Section 2.0, *Project Description*, of the Draft EIR and Topical Response J, *Gondola Design and Operations*, of the Final EIR, for discussion of how the proposed Project would be equipped with security features and the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities. Each cabin would have an onboard security camera with a live feed to the control room, as well as a "push to talk" button allowing two-way communication with control room personnel. Since the cameras would be monitored in real time, operation personnel would have the ability to identify developing situations and intervene verbally. Operators would maintain communications protocols with law enforcement and first responders. In the event of a security incident inside a cabin, cabins could be stopped at the next station within minutes. At stations and adjacent areas, attendants would be able to observe activities and respond to disturbances. During Dodger games and other events at the Stadium, additional security or trained staff are expected to be present to further reduce the probability of security issues and minimize response times.

Protection Against Malfunctions. Refer to Section 2.0, *Project Description*, of the Draft EIR and Topical Response J, *Gondola Design and Operations*, of the Final EIR, for discussion of how the proposed Project is unlikely to become inoperable due to a system malfunction given the system's design redundancies, regular maintenance, and backup battery power.

Objects Falling from Cabins. As discussed in Section 2.0, *Project Description*, of the Draft EIR, cabins would feature a ventilation system and sealed windows for viewing purposes, which, for security reasons, would not open. Any small ventilation panels that would be provided as a feature of the proposed Project cabins would be screened to prevent the tossing of debris from cabins.

Cabin Power. Refer to Topical Response J, *Gondola Design and Operations*, of the Final EIR, which explains that power for the proposed Project cabins is expected to be provided by batteries located on each cabin. The batteries would be charged overnight while the cabins are stored at the subterranean cabin maintenance area below the Dodger Stadium Station. In addition, during operations, the batteries would be continuously charged by the movement of the cabins along the proposed Project alignment.

Emergency Operations Plan. Refer to Topical Response J, *Gondola Design and Operations*, of the Final EIR, for discussion of how the Emergency Operations Plan for the proposed Project would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local authorities.

Comparable Urban Aerial Transit Systems. Refer to Topical Response M, *Comparable Urban Aerial Transit Systems*, of the Final EIR, for discussion of comparable aerial transit systems in cities around the world and their operations, integration with nearby residential and open space uses, community benefits, promotion of public art and collaborations with local artists, and evidence that such systems can reduce violent crime in nearby areas and promote a sense of security compared to other modes of public transportation.

Tower Safety. Refer to Appendix F, *Memo on Structural Engineering*, of the Final EIR, for discussion of the structural design of the proposed Project's towers. As discussed therein, the towers would "meet the rigorous safety standards of applicable standards, requirements, and building codes, including all mandated standards addressing environmental factors such as wind and seismic effects and gravity forces, including all impacts from the height and tilt of the structures, to ensure structural integrity and safety."

Gondola Safety. Refer to Topical Response M, *Comparable Urban Aerial Transit Systems*, of the Final EIR, for discussion of comparable aerial transit systems in cities around the world that operate safely, efficiently, and in concert with nearby residential and open space uses.

ADA Accessibility at Stations. Refer to Section 2.0, *Project Description*, of the Draft EIR, and Topical Response J, *Gondola Design and Operations*, of the Final EIR, for discussion of how the proposed Project, including the station boarding process and cabin design, would comply with all accessibility requirements of the Americans with Disabilities Act ("ADA"). If needed, cabins could be either slowed or stopped in the station for boarding purposes. Station attendants would be located within each station to assure safe boarding and to execute stops for unloading or boarding purposes, if necessary. Attendants would also provide customer interaction and observation; if a passenger needs special assistance, an attendant may either further slow or stop a cabin. A separate operator would be stationed in a control booth monitoring screens, which would show activities in each cabin and station, as well as the system controls. The time necessary to slow or stop cabins is factored into the overall system capacity of the proposed Project. Pathways to the boarding areas would be ADA compliant with redundant vertical circulation and appropriately sized passageways. The entry widths and interiors size of each cabin would comply with the requirements of the ADA.

Passengers per Hour. Refer to Topical Response J, *Gondola Design and Operations*, of the Final EIR, which explains that the gondola cabins would move at an approximate speed of 13.4 miles per hour with headways of approximately 23 seconds, which represents the time between cabins arriving at a station. As one hour consists of 3,600 seconds, approximately 156.5 cabins would arrive every hour (3,600 seconds / 23 seconds. The proposed Project's Tricable Detachable Gondola system ("3S") cabins typically carry between 30 to 40 passengers each, depending on the exact configuration of seating and cabin amenities selected. At a capacity of 35 passengers per cabin, at 156.5 cabins per hour, 5,478 passengers would arrive at each station per hour (35 passengers per cabin x 156.5 cabins per hour). Given that the same headway applies in each direction, the total, calculated system capacity is therefore 5,478 pphpd (passengers per hour per direction).

Weather. The proposed Project would be operable in all anticipated temperatures and would adhere to applicable active weather alerts. Refer to Response to Comment P12-1 on page 6.0-964 of the Final EIR.

Environmental Justice

Environmental Justice. Refer to Topical Response N, *Environmental Justice*, of the Final EIR, for discussion of how the Draft EIR addressed environmental justice, how the proposed Project supports Metro's Equity Platform, is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed Project alignment, how the public outreach for the proposed Project was designed with environmental justice principles in mind, how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities, and would itself address a need for a permanent transit connection to one of the region's most visited venues and would alleviate existing congestion on surrounding neighborhood streets, arterial roadways, and freeways, thereby reducing associated air pollution and improving safety, and how the proposed Project is designed to be ADA compliant. Refer to Topical Response C, *Project Features*, of the Final EIR, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. The Project Sponsor would convene stakeholder groups to coordinate on issues related to proposed Project features. The proposed Project would be free to ride for anyone with a ticket to a Dodgers game. In addition, the proposed Project's Community Access Plan would allow residents, employees, and businesses located close to the proposed Project to ride the gondola using their Metro fare at no additional cost.

Housing

The Project Will Not Displace Housing or Prevent Planned Housing. Refer to Topical Response E, *The Proposed Project Will Not Displace Housing or Prevent Planned Housing*, of the Final EIR, for discussion of how the proposed Project will not displace housing or prevent planned housing.

Gentrification. Refer to Topical Response E, *The Proposed Project Will Not Displace Housing or Prevent Planned Housing*, of the Final EIR, for discussion of how the proposed Project will not exacerbate gentrification or result in displacement of residents in the surrounding neighborhoods and is consistent with Metro's considerations regarding gentrification and displacement.

Project Sponsor and Proposed Project Costs and Financial Analysis

Project Sponsor. Refer to Topical Response L, *Project Sponsor and Proposed Project Costs and Financial Analysis*, of the Final EIR, for discussion of the Project Sponsor.

Proposed Project Costs and Financial Analysis. Costs and funding of the proposed Project are not a CEQA issue and do not require a response. Refer to Topical Response L, *Project Sponsor and Proposed Project Costs and Financial Analysis*, of the Final EIR, and Section 4.0, *Costs and Financing*, of the Final EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from private bond financing serviced by revenue from the proposed Project. No public funds – including Metro, local agency funds, or state sources – have been sought or committed to the proposed Project.

3.2.2 Topical Response 2: Request for Consultation with the Santa Monica Mountains Conservancy

Comments on the Draft SEIR address Metro's request for consultation with SMMC. The Court Opinion directed Metro to "comply with CEQA by requesting consultation with the Santa Monica Mountains Conservancy specifying a reasonable time within which the trustee agency must respond in accordance with sections 21080.4 and 21104"[1] of the Public Resources Code. On July 30, 2025, Metro sent a consultation request to SMMC, inviting it to respond within 30 days if it wished to consult. This 30-day period parallels the timeframe set forth in sections 21080.4 and 21104 that the Court Opinion cited. Metro's July 30, 2025, consultation request was posted to the SB 44 website. SMMC did not request consultation during that period.

Under Section 15207 of the CEQA Guidelines, if a public agency invited to comment on an EIR does not respond within the time specified, it is presumed that the agency has no comment to make. CEQA does not require Metro to delay preparation of the Draft SEIR while awaiting a response from SMMC.

Comments assert that Metro limited SMMC's ability to comment or restricted the scope of its input. That is not correct. Metro's July 30, 2025, consultation request invited SMMC to provide its views on the scope and content of any environmental information relevant to its trustee responsibilities. Metro did not limit the topics SMMC could address. To assist SMMC's review, Metro also provided access to the previously certified Draft and Final LA ART EIRs. The notice did not state, or imply, that SMMC was required to review the entire environmental record before offering input, nor did it narrow the issues SMMC could raise. Providing access to prior CEQA documents is standard practice and does not alter the statutory consultation period. Under Public Resources Code Sections 21080.4 and 21104, the consultation period is 30 days unless a longer period is mutually agreed upon; the consultation timeframe in Metro's notice was consistent with these provisions. SMMC has been aware of this proceeding for many months. On May 12, 2025, members of the public addressed SMMC's Board about the proposed Project and SMMC's ability to consult with Metro about the proposed Project in response to the Court Opinion.[2] On July 30, 2025, Metro invited SMMC to consult about the proposed Project. On October 20, 2025, SMMC's Board received a report from State Parks on the proposed Project and discussed whether it would comment on the Draft SEIR. On November 17, 2025, SMMC considered a resolution authorizing a comment letter on the proposed Project's Draft Supplemental EIR.[3] On November 18, 2025, SMMC submitted a comment on the proposed Project's Draft Supplemental EIR. Metro considered SMMC's comments and responded to them, which are included in Responses PA1-1 through PA1-3 in Section 3.0 of this Final SEIR.

[1] Court Opinion, pp. 118-119.

[2] See Minutes of the Joint Meeting of SMMC and the SMMC Advisory Committee (May 12, 2025).

[3] SMMC and SMMC Advisory Committee Meeting Agenda (Oct. 20, 2025), Item No. 9(f)(1); SMMC and SMMC Advisory Committee Meeting Agenda (Nov. 17, 2025), Item No. 8(b).

3.2.3 Topical Response 3: Construction Noise[1]

Some comments on the Draft SEIR address the proposed Project's analysis of interior noise levels from temporary construction and potential mitigation for those impacts. Some comments also suggest additional measures that Metro should consider to mitigate temporary interior noise levels from Project construction.

The proposed Project would be built in an existing urban area. Existing daytime ambient outside noise levels measured ranged from 53.6 dBA (similar to a quiet urban area) to 69.8 dBA (similar to a gasoline powered lawnmower at 100 feet). Refer to Table 3.13-10 of the Draft LA ART EIR for additional information regarding existing exterior noise conditions. As shown in Table 3-3 of the Draft SEIR, estimated worst-case construction noise levels at the exterior of noise-sensitive receptors would temporarily range from approximately 65 dBA (similar to a commercial area) to 88 dBA (similar to a food blender at 3 feet). However, as described in the Draft SEIR, when outside noise reaches the exterior of a building, some of that sound is blocked by the building's facade and some is transmitted inside the building. The portion of the sound that is transmitted through the building contributes to interior noise levels experienced by occupants. As shown in Table 3-3 of the Draft SEIR, modeling indicates that interior noise levels experienced by occupants from construction would range from approximately 37 dBA (comparable to quiet urban nighttime noise levels) to 58 dBA (less than normal speech at 3 feet) if occupants keep windows closed. The exterior construction noise values identified in Table 3-3 would be equivalent to the noise levels one experiences when standing directly in front of an open window. Noise levels experienced by occupants would decrease as one moves further away from an open window.

In addition, Project construction noise levels are typical of noise levels for other construction projects throughout the City. For example, other construction projects throughout the City have anticipated maximum construction noise levels ranging from approximately 80 dBA to 94 dBA.2 These projects would be located between 15 feet and 60 feet from noise-sensitive residential receptors.

<u>Construction Noise Methodology</u>

The LA ART EIR assessed exterior sound levels at nearby sensitive receptors from temporary construction noise. Modeled construction noise impacts were a function of the type and number of equipment in use, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance from noise-sensitive receptors. Each phase of construction would involve different types of construction equipment and would, therefore, have its own distinct noise characteristics. Construction noise levels would also fluctuate throughout a given workday as construction equipment moves within the various Project component construction sites.

The Draft and Final LA ART EIRs determined potential impacts by modeling Project-related construction noise levels at representative sensitive receptors and comparing those levels to existing ambient noise conditions (i.e., noise levels without construction noise from the proposed Project). Consistent with industry best practice and guidance of the Federal Transit Administration (FTA) and the City of Los Angeles, construction noise levels were established using *exterior* ambient noise measurements. Applicable

[1] AECOM has prepared a Supplemental Technical Report in response to comments received on the Draft SEIR regarding the proposed Project's potential construction noise impacts and construction noise mitigation (see AECOM, Nov. 2025). The Supplemental Technical Report is included as Appendix F to this Final SEIR.

[2] See, e.g., 1000 Seaward Project (80.2 to 89.3 dBA); Television City 2050 Project (82.7 to 88.8 dBA); 1235 Vine Street Project (85 to 92.2 dBA); 6000 Hollywood Boulevard Project (91.7 dBA); East End Studios ADLA Project (86.9 dBA to 93.5 dBA).

thresholds of significance, including the City of Los Angeles CEQA Thresholds Guide (2006)[3], are likewise based on exterior noise levels. As such, the LA ART EIR's analysis of construction noise focused on exterior noise levels. Refer to Section 3.4.2 of the Draft SEIR for a detailed discussion of interior construction noise methodology, and refer to Section 3.13 of the Draft LA ART EIR for a detailed discussion of exterior construction noise methodology.

Scope of Construction Noise Analysis

As identified in the Draft LA ART EIR, construction-period noise would exceed the established construction noise thresholds for exterior noise. Mitigation Measure NOI-A, as modified in the Draft SEIR, would reduce construction noise levels. However, as recognized in the Draft and Final LA ART EIRs and Draft SEIR, construction period noise would remain significant and unavoidable.

Analyzing construction noise at exterior points of nearby receptors, rather than interior noise, is the industry best practice and consistent with FTA and City of Los Angeles guidance. In accordance with the Court Opinion, however, the Draft SEIR also analyzed interior noise levels from construction and assessed the feasibility of retrofitting existing buildings to reduce interior construction noise. Refer to Section 3.5.2 of the Draft SEIR for a detailed discussion of the interior construction noise analysis.

Some comments suggested the analysis of interior noise was flawed because of variations in building construction. As explained in Appendix A to the Draft SEIR, sound insulation (noise reduction) testing was performed for a home constructed in 1927 (430 Savoy Street). This building featured visible openings where sealing issues (i.e., gaps) occurred between the sashes of the wood sash single-pane windows. Based on the measured façade noise reduction levels at 430 Savoy Street, interior construction noise levels at older homes along Savoy Street (Receptor 17Nb) are expected to reach 55 dBA—approximately 16.5 dB lower than the estimated exterior sound level. The home at 430 Savoy Street was considered to be generally representative of the older single-family homes on the same block due to its age and construction type.

While some homes on the north side of Savoy Street are older, they generally feature similar construction styles as they relate to roof, wall, and window assemblies. Although the basement of the home at 430 Savoy Street does feature large, open-air grille openings to a basement/crawlspace area, the basement level closest to the tested façade (south side) featured windows and doors that were installed when the basement was converted to become additional living space. As a result, the open-air grille basement area is the primary path of noise that is not captured in the testing performed. However, the testing found that exterior noise was transmitting through nearly all building components (walls, roof, windows), and the addition of another path through a basement area would not perceptibly increase the aggregate construction noise level within the homes. Therefore, interior construction noise levels at homes built in the late 1800s are still expected to reach approximately 55 dBA, which is similar to that commonly experienced in a large business office (Caltrans 2013). No additional testing or modeling to determine

3 As discussed in Section B, General Corrections and Clarifications, of the Errata to the Final EIR, on December 8, 2023, following the release of the Final EIR, the City of Los Angeles Department of City Planning issued via email the December 2023 Construction Noise and Vibration Proposed Updates to Thresholds and Methodology. The City proposed to update its construction noise and vibration thresholds to be used in assessing the environmental impacts of projects in accordance with CEQA. On September 25, 2024, the City officially adopted the Updated CEQA Thresholds and Methodology for Construction Noise and Vibration and Historical Resources. The City's Updated CEQA Thresholds remove the increase-over-ambient threshold for daytime construction activities (between 7:00 A.M. and 7:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on Saturdays). In addition, the Updated CEQA Thresholds provide for a maximum 80 dBA Leq (8-hour) absolute threshold at sensitive uses (at the property line with outdoor uses or at the exterior of the building), including outdoor public recreational areas.

construction noise levels in homes built in the late 1800s is necessary. These comments also underscore that the basement areas of the homes on the north side of Savoy Street would require substantial additional retrofit work (e.g., installation of acoustically absorptive treatments, sealing or full replacement of floorboards and/or underlayment).

Finally, some comments suggested that the Draft SEIR improperly assumes that occupants will not open windows during construction. The Draft SEIR does not assume that residents will keep their windows closed or operate air-conditioning during construction. In order to evaluate interior noise levels, the modeling appropriately assumes that windows will be closed, otherwise, the modeled noise levels would not reflect the noise reducing capability of the existing buildings. As reported in the Draft SEIR, with windows open, the noise reduction from building facades would be dramatically reduced. Interior noise levels from construction were modeled to assess the efficacy of performing acoustic retrofitting as a mitigation measure for temporary construction noise. Predicted exterior construction noise results were already provided in the LA ART EIR (and restated in the Draft SEIR). These exterior construction noise values would be equivalent to the noise level experienced while standing directly in front of an open window. Therefore, this information is already provided in the Draft SEIR. No additional analysis is necessary. Further, as explained in the Draft SEIR, temporary construction noise impacts would remain significant and unavoidable, even with implementation of all feasible mitigation measures. Nonetheless, construction would be limited, as required by the Los Angeles Municipal Code, to daytime hours only, Monday through Saturday. And as construction equipment moves throughout the Project construction areas as construction activities progress, the actual noise levels experienced by building occupants will vary.

Potential Mitigation for Temporary Construction Noise

Comments on the Draft SEIR proposed additional measures to mitigate the Project's significant construction noise impacts, including a voluntary building noise insulation program; provision of personal hearing protection (e.g., earplugs); temporary building occupant relocation assistance; and restricting construction activity by day or hour. As discussed below, many of these suggested measures are not feasible. Nevertheless, the Project Sponsor agrees to provide personal hearing protection devices as part of a voluntary Project commitment. The Project Sponsor also agrees to expand Project Design Feature PDF-NOI-B to include coordination for special or community events and outreach in multiple languages commonly spoken in the area.

(1) Voluntary Building Noise Insulation Program

Commenters suggested a voluntary noise insulation program. Such a program is analyzed in the Draft SEIR. For the reasons explained in detail in Section 3.6 of the Draft SEIR, a voluntary retrofit program is not feasible within the meaning of CEQA because Metro cannot ensure, either as a practical or legal matter, that such a program could be successfully accomplished within a reasonable timeframe or that it would reliably reduce interior construction noise. CEQA also requires that mitigation measures be fully enforceable through permit conditions, agreements, or other "legally binding instruments" within the agency's jurisdiction. (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15091(d), 15126.4(a)(2).) A voluntary program, by definition, cannot meet these standards.

Metro and the Project Sponsor do not own or control the affected buildings. Any retrofit program would depend entirely on the independent decisions of private owners and tenants. Metro cannot require residents to apply, cannot guarantee that participating homes would be completed before Project construction begins, and cannot ensure that installations would achieve consistent and effective noise attenuation. Metro also has no control over how residents use their homes afterwards, including decisions that could substantially reduce or negate any acoustic benefit, such as opening windows or making alterations.

The Los Angeles World Airports' (LAWA's) Residential Sound Insulation Program, referred to by comments, illustrates the constraints associated with a voluntary retrofit program. LAWA's program is implemented under federal law and applies to homes exposed to long-term (permanent), high-intensity aircraft noise above 65 dBA CNEL (reflecting 24-hour cumulative airplane noise). It is supported by dedicated funding through the Federal Aviation Administration's (FAA's) Airport Improvement Program (AIP), administered by experienced staff, and includes established intake, acoustic testing, construction, and inspection protocols. Even with these extensive resources, completing retrofits for a single home typically takes between one to two years from application to completion.[4]

As this example shows, a voluntary retrofit program could not be designed, funded, scoped, permitted, implemented, inspected, and verified at participating properties within a reasonable time period before Project construction begins. Construction for the Project is expected to last approximately 25 months. However, the activities that generate the highest levels would occur intermittently and at varying locations, such that individual homes would be exposed to higher levels of construction noise only during the particular phases when work is taking place close to them. A mitigation measure that requires an implementation timeline comparable to, or longer than, the very period of impacts it is intended to address does not meet the reasonableness standard inherent in CEQA's feasibility requirement. (See Pub. Resources Code, § 21061.1 [to be feasible, mitigation must be "capable of being successfully accomplished within a reasonable period of time"].)

A retrofitting program would require a sequence of individualized construction projects, each with its own design, permitting, scheduling, and construction challenges. Any of these issues could stall or prevent work entirely. In multi-family buildings, even one non-participating unit could prevent installation of uniform façade assemblies, undermining the effectiveness of the program. Further, because retrofitting may require opening walls, modifying windows, adding insulation, or addressing building-specific age deficiencies, each home would present its own different structural, code-compliance, and permitting challenges that Metro cannot predict or control. These complications directly affect both the time required to implement and the likelihood of success.

Finally, construction noise remains a common condition in large urban areas. Within the City of Los Angeles, approximately 173,000 permits were submitted to the Department of Building and Safety in fiscal year 2022-2023.[5] The City has adopted construction noise limits and allowable work hours to manage this citywide issue in a consistent and enforceable manner. Requiring this Project to implement a large, individualized retrofit program would effectively create a precedent that a single project must assume responsibility for long-term, private-property improvements whenever temporary construction occurs nearby. Such a mitigation measure would be disproportionate to the temporary and fluctuating nature of construction activities and temporary construction noise impacts.

Reimbursement

Comments also suggested that Metro or the Project Sponsor provide reimbursement funds to homeowners or tenants to perform noise insulation work themselves or choose to keep the funds instead of undertaking the work. In addition to the feasibility concerns discussed above, a reimbursement program

4 https://www.lawa.org/lawa-environment/noise-management/sound-insulation-grant-program/rsi-program,

5 City of Los Angeles, Construction Noise and Vibration, Updates to Thresholds and Methodology (2024).

presents its own distinct problems. Metro cannot require property owners or tenants to use the funds for insulation, follow any specified construction standards, obtain necessary permits, allow Metro to inspect the work, or demonstrate that any noise reduction has been achieved. Allowing residents to retain the funds without undertaking the work, as comments proposed, would eliminate any mitigation benefit and render the measure unenforceable.

Disruption from Potential Retrofit Mitigation Measures

Comments further suggested that some residents may prefer temporary disruption from acoustic retrofitting over noise from Project construction. This suggestion, however, underscores the very reason such a measure is infeasible under CEQA. As described in Section 3.6.1 of the Draft SEIR, and above, any retrofitting program would depend on the independent choices of numerous private owners, tenants, and occupants. The fact that some individuals believe they might be interested, while others may not, illustrates how Metro would have no ability to ensure participation, to guarantee access, or to require that the work be performed in a way that ensures meaningful reduction of interior noise levels.

Even for owners and occupants who elect to participate, retrofitting would not necessarily restore interior conditions to what the residents experience today. Many retrofit treatments, including upgraded windows, door seals, and added insulation, provide noise reduction only when windows remain closed. As a result, any potential benefit would be lost whenever residents open windows, which many households regularly do for ventilation, cooling, or comfort. In a community with older buildings, limited air-conditioning, a desire to conserve electricity, and varied housing conditions, asking residents to keep windows closed during warm months is not realistic and would not replicate their current living environment. CEQA mitigation cannot require residents to alter how they occupy their homes, nor can it rely on residents foregoing ventilation to make a measure function.

Further, even with windows closed, retrofits offer diminishing and highly variable noise attenuation depending on building age, condition, construction type, interior layout, and interior furnishings. For example, units with hardwood floors and minimal furnishing can increase reverberation, while carpet and soft materials can reduce it. Conditions differ widely from one unit to the next, meaning that two buildings receiving the same retrofit treatment may experience very different levels of improvement, if any. Therefore, retrofitting cannot produce a predictable or uniform level of noise reduction for participants in the retrofitting program. Because these variations stem from intrinsic characteristics of the buildings and decisions of owners and occupants that Metro cannot change or control, retrofitting cannot ensure that construction noise levels are mitigated.

Lastly, acoustic retrofitting cannot be incorporated as a Project Design Feature (PDF). PDFs must reflect actions that the Project Sponsor can implement as part of the Project. Retrofitting requires access to private homes, individualized engineering and construction work, and the voluntary participation of property owners and occupants, none of which the Project Sponsor can assure. In addition, incorporating residential retrofits would significantly expand the nature and scope of the Project into residential construction and private-property improvements, well beyond the activities contemplated for the LA ART Project. PDFs must also be defined clearly enough that the Project Sponsor can commit to implementing them as part of the Project and in a way that is reasonably predictable. Because retrofits would differ for each individual building and would depend on multiple factors that cannot be determined or controlled, retrofitting cannot be expressed as a clear project commitment. Finally, because retrofitting is infeasible as mitigation under CEQA for the reasons described above, it cannot be re-characterized as a PDF.

(2) Personal Hearing Protection

Another measure suggested by commenters is the provision of personal hearing protection, such as foam earplugs or noise cancelling headphones. Personal hearing protection is designed to prevent hearing damage in environments where noise levels are high enough to pose a risk of auditory injury. The interior construction-noise levels identified in the Draft SEIR do not approach thresholds associated with hearing impairment and therefore do not warrant protective devices of this kind. Residential noise standards exist to ensure that interior environments remain compatible with normal activities expected in homes, such as conversation, watching television, listening to music or podcasts, using telephones, studying, or resting. In many cases, using personal hearing protection inside a residence would interfere with these basic, everyday activities to a greater extent than the temporary construction noise itself, even if that noise may be noticeable at times. For these reasons, personal hearing protection is not an appropriate or effective measure for addressing elevated but non-hazardous indoor noise levels, and the Draft SEIR appropriately focuses on feasible measures that relate to actual construction-related effects.

Nevertheless, the Project Sponsor has agreed, as part of a voluntary commitment, to make personal hearing protection available to anyone who requests it. Individuals may obtain personal hearing protection by contacting the noise and disturbance coordinator identified in NOI-PDF-B, who will provide the devices upon request. As part of this effort, information on how to request personal hearing protection will be included in public construction notices and on the Project's webpage.

(3) Community Outreach

Commenters suggested refinements to NOI-PDF-B's Community Outreach provisions to include outreach to small businesses, in addition to residents, and in multiple languages regularly spoken in the proposed Project vicinity, including English, Spanish, Vietnamese, Mandarin, and Cantonese. The Project Sponsor has agreed, as part of Project Design Feature NOI-PDF-B, to expand the community outreach to include small businesses and in multiple languages. Therefore, in response to this comment, Project Design Feature NOI-PDF-B's community outreach provisions have been refined. Refer to Section 2.0, *Corrections and Additions*, of the Final SEIR for the revised language of NOI-PDF-B.

(4) Temporary Building Occupant Relocation Assistance

Commenters also suggested providing temporary building occupant relocation assistance, either as a stand-alone mitigation measure or in combination with a voluntary building noise insulation program. Like the voluntary insulation program, a temporary relocation program would require the consent and cooperation of building occupants. Occupants differ in schedules, work-from-home needs, medical or accessibility considerations, family configurations, and their ability or willingness to temporarily relocate. Metro cannot compel occupants to vacate their homes.

In addition, the duration, extent, and practicality of relocations would vary significantly among individual buildings and occupants. The program would require Metro to identify eligible households, determine appropriate relocation periods, and arrange individualized temporary housing across multiple private homes. Although Metro assists with relocations in the context of property acquisitions, those efforts occur under defined statutory frameworks, with clear timelines, eligibility criteria, and acquisition-based triggers. In contrast, relocations based solely on fluctuating, temporary construction noise would require Metro to coordinate temporary relocations that are not tied to property acquisitions, lack objective standards, and may require repeated relocations. Further, to the extent a temporary relocation program would implicate federal or state relocation statutes, those laws impose extensive notice, advisory services, and housing obligations that are disproportionate to the temporary and variable nature of construction noise. Moreover, for a temporary relocation program to function, Metro would need to arrange relocations in advance of construction activities; however, construction schedules frequently shift due to field conditions, contractor sequencing, and other factors, making it difficult to ensure that relocation timing would correspond with actual noise-generating construction activities.

In summary, a voluntary relocation program is not a feasible mitigation measure for the proposed Project's temporary construction noise impacts under CEQA.

(5) Time Limits on Construction Noise by Day and Hour

As described in detail in Sections 2.0, *Project Description*, and 3.13, *Noise*, of the Draft LA ART EIR, Project construction would comply with the Los Angeles Municipal Code ("LAMC"). The LAMC already imposes time limits on construction by day and hour.

Section 41.40 of the LAMC prohibits construction between the hours of:

- 9:00 PM and 7:00 AM Monday through Friday;
- 6:00 PM and 8:00 AM on Saturday and National Holidays; and
- At any time on Sunday

Accordingly, construction activities would be limited to daytime hours, pursuant to the LAMC. While not anticipated, approval would be required from the City of Los Angeles Board of Police Commissioners for any extended construction hours, including construction on Sundays.

In addition, LAMC Section 112.05 sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet between 7:00 AM and 10:00 PM when operated within 500 feet of a residential zone, unless technically infeasible.

The proposed Project is not expected to impact community or special events. Project construction would be coordinated with community and special events as necessary pursuant to Mitigation Measure TRA-B, which requires implementation of a Construction Traffic Management Plan (CTMP"). The CTMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP will be based on the nature and timing of the specific construction activities at each of the Project construction sites and may be updated as construction progresses. Refer to Section 3.17, *Transportation*, of the Draft LA ART EIR for a detailed discussion of Mitigation Measure TRA-B.

Nevertheless, the Project Sponsor has agreed to refine Project Design Feature NOI-PDF-B to expressly provide that Project construction be coordinated with community and special events. Therefore, in response to this comment, Project Design Feature NOI-PDF-B has been refined to provide for coordination of construction activities with community and special events. Refer to Section 2.0, *Corrections and Additions*, of this Final SEIR for the revised language of NOI-PDF-B.

3.2.4 Topical Response 4: No Project Changes, Changed Circumstances, or Significant New Information

Comments on the Draft SEIR contend that changes to the proposed Project or in circumstances surrounding the proposed Project or significant new information exists that warrants additional environmental review under CEQA. New information is not "significant" under CEQA unless it would change the document in a way that deprives the public of a meaningful opportunity to provide feedback. Three examples of such new significant information include: (1) when substantial project changes require major revisions to the prior EIR; (2) when substantial changes regarding project circumstances require major revisions to the prior EIR; or (3) when there exists new information of substantial importance that was not known or could not have been known with the exercise of reasonable diligence at the time the prior EIR was certified. (CEQA Guidelines, § 15088.5; see also CEQA Guidelines, § 15162(a).) Generally, a change in the regulatory setting is not new information that would necessitate additional environmental review under CEQA Guidelines Sections 15088.5 or 15162. None of the conditions that would trigger additional CEQA review are present here. A summary of why no such triggers apply, organized by topic area, is included below.

Tribal Cultural Resources

Some comments on the Draft SEIR asserted that Metro's tribal consultation under Assembly Bill (AB) 52 was insufficient or that consultation had to be reinitiated.[1] As documented in the LA ART Draft EIR, Section 3.18, *Tribal Cultural Resources*, Metro conducted and concluded consultation with eight tribes.

Reinitiation of tribal consultation is not required here because none of the triggers for supplemental review under CEQA Guidelines Section 15088.5 or 15162 have been met. The proposed Project has not changed, and no new information has become available that would alter the analysis or conclusions reached in the EIR, including with respect to tribal cultural resources. Metro mailed the Notice of Availability of the Draft SEIR to the eight previously identified tribes. No Native American Tribes provided public comments on the Draft SEIR.

Commenters cited *Koi Nation of Northern California v. City of Clearlake* (2025). That decision did not alter the statutory requirements for consultation under AB 52. Instead, *Koi Nation* addressed whether a particular agency satisfied those existing requirements in its project-specific context. Since Metro's consultation process fully complied with AB 52, Metro's consultation was not challenged in the prior litigation and therefore is presumed valid and to have complied with the law, and no new circumstances exist that would require renewed consultation, further action under AB 52 is not warranted or required.

Senate Bill 79

SB 79 (2025) added Chapter 4.1.5 (commencing with Government Code Section 65912.155) to Division 1 of Title 7 of the Government Code to promote transit-oriented development (TOD). SB 79 requires local governments and transit agencies to allow qualifying housing projects located within one-half mile of a TOD stop, as defined, on sites zoned for residential, mixed, or commercial development. Qualifying

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[1] AB 52, enacted in 2015, established tribal cultural resources as a new category of protected resources under CEQA. It requires lead agencies to notify Native American tribes that have requested consultation and, upon a tribe's request, to engage in consultation early in the CEQA process (prior to and during the Draft EIR process) to identify project impacts on tribal cultural resources and appropriate mitigation and avoidance measures. (Pub. Resources Code, §§ 21080.3.1, 21080.3.2.) Consultation concludes when the parties agree, or when a party, acting in good faith and after reasonable effort, determines that mutual agreement cannot be reached. (Pub. Resources Code, § 21080.3.2(b).)

projects must meet specified minimum density, height, floor area ratio and affordability requirements. SB 79 also authorizes transit agencies to adopt TOD zoning standards for district-owned real property located within a TOD zone and provides that qualifying residential projects meeting these standards are deemed consistent with local general plan and zoning provisions for the purposes of the Housing Accountability Act (Gov. Code, § 65589.5).

SB 79 defines a "transit-oriented development stop" as (1) "a major transit stop, as defined by Section 21064.3 of the Public Resources Code"; or (2) stops on a route for which a "preferred alternative"[2] has been selected or which are identified in a regional transportation improvement program, that is served by (i) heavy rail transit, (ii) very high frequency commuter rail, (iii) high frequency commuter rail, (iv) light rail transit, or (v) bus service, within an urban county meeting certain standards set forth in the Public Resources Code. SB 79 further provides that when a new transit route or extension was not identified in the applicable regional transportation plan on or before January 1, 2026, its stops are not eligible as TOD stops unless they qualify as Tier 1 stops served by heavy rail or very high frequency commuter rail.[3]

The proposed Project's stations do not meet either definition of a TOD stop. Public Resources Code Section 21064.3, referenced in the first definition, defines "major transit stop" as: (a) an existing rail or bus rapid transit station; (b) a ferry terminal served by either a bus or rail transit service; or (c) the intersection of two or more major bus routes with a frequency of service of 20 minutes or less during the morning and afternoon peak commute periods. The gondola stations do not fall within any of these categories. First, the gondola is not an "existing rail or bus rapid transit station," within the meaning of subdivision (a). The statute refers to existing rail or bus rapid transit modes, whereas the Project is a proposed aerial cable-propelled system. Second, the Project stations are not ferry terminals of any kind and therefore do not meet subdivision (b). Third, the Project stations are not located at the intersection of two or more major bus routes with 20-minute peak-period frequencies.

Nor do the Project stations qualify as TOD stops under SB 79's second definition (stops on a route for which a preferred alternative has been selected or which are identified in a regional transportation improvement program, that is served by heavy rail, high or very high frequency commuter rail, light rail transit, or bus service, within an urban transit county).[4] The only potentially applicable SB 79 transit category for the proposed Project is "light rail transit," since the Project is not heavy rail, commuter, rail or bus service. However, the gondola does not meet SB 79's definition of light rail transit.

SB 79 defines "light rail transit" to include "streetcar, trolley, and tramway service."[5] The proposed Project is not a "streetcar, trolley, and tramway service" for purposes of SB 79. These are rail-based modes that operate on steel tracks. The proposed Project is an aerial gondola system and does not constitute a streetcar, trolley or tramway. While the Federal Transit Administration (FTA) deems aerial tramways as a form of "fixed guideway" systems for the purposes of its Section 5309 Grant Program, nothing in SB 79 indicates an intent to adopt the federal definition of fixed guideway system. Moreover, FTA itself distinguishes aerial tramways from automated guideway transit and commuter rail, a fact that further suggests that aerial ropeway systems are a different mode than the rail-based services referenced in SB

[2] SB 79 does not define what constitutes a "preferred alternative."
[3] Government Code, § 65912.156(p).
[4] Government Code, § 65912.156(p).
[5] Government Code, § 65912.156(h).

79. Because the proposed Project is not “light rail transit” under SB 79’s definition, its stations do not qualify as TOD stops under SB 79.

Even if the proposed Project qualifies as one of the transit modes listed in SB 79, its stations still could not qualify as TOD stops because the Project is not identified in any regional transportation plan (RTP) or regional transportation improvement program before January 1, 2026. SB 79 provides that when a new transit route was *not* included in an RTP on or before that date, its stops are ineligible *unless* the route would qualify as a “Tier 1” TOD stop (i.e., heavy rail or commuter rail). [6] The proposed Project is not heavy rail or commuter rail. Nor is the Project identified in the Southern California Association of Governments’ (SCAG’s) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), *Connect SoCal 2024,* or any other RTP. Accordingly, because the Project is neither included in any RTP or RTIP nor eligible for Tier 1 status, its stations cannot meet the statutory definition of “transit-oriented development” stop under SB 79. (See Government Code § 65912.156(p).)

Independent of the proposed Project, SB 79 may influence the broader regulatory environment around existing major transit stops in Los Angeles, such as LAUS and Metro’s A Line Chinatown Station, by establishing minimum permissible statewide standards for residential density, height, and floor area ratio near those stops. Such changes, however, would arise independently of the proposed Project. Because the Project’s own stations do not qualify as TOD stops, it would not trigger or expand the application of SB 79 or otherwise modify allowable development intensity near its stations.

Any future development that might occur as a result of SB 79 would be dependent on independent actions by local governments and private developers, site-specific project proposals, market-driven investment decisions, and other factors outside Metro’s control. The location, scale, timing, and intensity of such future development are presently unknown. As a result, the extent to which SB 79 could alter development patterns near existing transit stations, or interact with the Project’s effects, cannot be reasonably forecast and would occur independently of the proposed Project. CEQA does not require speculation regarding cumulative impacts associated with such uncertain future development.[7] The nature, timing, and extent of any potential future development cannot be reasonably predicted and would be too speculative to assess in this analysis.

Refer to Section 3.14, *Population and Housing*, of the Draft LA ART EIR for additional information.

For these reasons, the adoption of SB 79 does not constitute new information or changed circumstances indicating that the proposed Project would foreseeably result in new or more severe environmental effects than previously disclosed. Accordingly, the enactment of SB 79 does not trigger the need for further CEQA review.

Los Angeles Daily News Editorial by Joshua Schank

Comments on the Draft SEIR cite a June 23, 2025, opinion piece by Joshua Schank in the Los Angeles Daily News. Commenters misrepresent the opinion piece’s content and the opinion of Mr. Schank, who is no

[6] Government Code, § 65912.156(p).

[7] See CEQA Guidelines, § 15145.

longer employed at Metro as of 2022. Thus, the opinion piece is irrelevant to Metro's review of the proposed Project under CEQA.

The opinion piece did not state that the Project would result in new housing development at the Dodger Stadium parking lots or anywhere else, or that such development is reasonably foreseeable. Rather, the author—who is not affiliated with the Project Sponsor or Metro—offered a general opinion about the broader benefits of infrastructure projects and challenges posed by CEQA litigation, using the gondola as an example of how CEQA litigation can delay such projects. Mere speculation and opinions by an individual in his personal capacity not affiliated with the Project Sponsor nor Metro is not substantial evidence of a new significant environmental impact, let alone substantial evidence supporting an argument that the proposed Project may somehow lead to new housing development. As discussed in Sections 3.11, *Land Use and Planning*, 3.14, *Population and Housing*, and 5.4, *Growth-Inducing Impacts*, of the Draft LA ART EIR, the proposed Project would facilitate access to existing transit systems and increase connectivity in downtown Los Angeles, consistent with adopted City plans and policies encouraging development near transit stations and corridors and anticipating transit-oriented growth. The proposed Project would not induce substantial unplanned population growth directly or indirectly. Moreover, any future development would be subject to its own review and approval process. Therefore, the LA ART EIR appropriately analyzed whether future development was reasonably foreseeable and concluded it was not. The Court of Appeal upheld that determination, finding no substantial evidence that additional development would be a reasonably foreseeable consequence of the Project and rejecting claims of improper segmentation or "piecemealing." Refer to Topical Response G, *No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property*, of the Final LA ART EIR for more information. The Los Angeles Daily News opinion piece, which expresses the opinion of one individual on a variety of topics, does not constitute new information or changed circumstances requiring further CEQA review. The LA ART EIR's conclusions, including regarding the proposed Project's potential to induce growth, remain valid and no further environmental review is required regarding the proposed Projects potential to result in new housing development.

<u>*Transportation*</u>

Los Angeles 2028 Summer Olympics and Paralympics

In April 2025, it was announced that Dodger Stadium will serve as the official venue for baseball during the 2028 Summer Olympics and 2028 Summer Paralympics (collectively referred to as Los Angeles 2028 or "LA28"). Dodger Stadium regularly hosts large special events, including Major League Baseball games and concerts. It is the largest MLB stadium by capacity, with approximately 56,000 seats. As discussed in Section 2.3.7, *Project Description: Purpose and Need*, of the Draft LA ART EIR, Dodger Stadium is one of the region's most visited venues, with approximately 100 baseball games and other events each year.

At the time of LA ART EIR preparation, it was not reasonably foreseeable whether, or to what extent, Dodger Stadium would be used for LA28. Although it is now known that Dodger Stadium will host LA28 baseball, the conclusions of the LA ART EIR remain unchanged for the reasons discussed below. For discussion regarding the use of the Dodger Stadium property as parking for LA28, including as a park-and-ride lot, refer to Response to Comment GO14-63 of the Final LA ART EIR.

Project Construction: To the extent Project construction overlaps with LA28, the LA ART EIR analyzed potential construction traffic impacts in the Project Area under conditions that accounted for stadium events drawing large regional crowds. Use of Dodger Stadium as an LA28 baseball venue would be similar in nature to baseball games and other large special events previously considered in the analysis.

To address potential temporary impacts from Project-related construction traffic, the proposed Project would implement Mitigation Measure (MM)-TRA-B: Construction Traffic Management Plan. Under MM-TRA-B, the Project Sponsor, transportation engineers, and construction contractor must prepare a detailed Construction Traffic Management Plan (CTMP), approved by the City of Los Angeles prior to issuance of building permits, that specifies street closures, detours, haul routes, staging areas, worker parking, and delivery schedules. The CTMP must ensure continued access for residents, businesses, and emergency services, and it must be coordinated with the Los Angeles Department of Transportation (LADOT), the Los Angeles Fire Department, and other relevant agencies. The plan would require monthly coordination meetings with City staff and contractors for nearby projects to avoid overlapping disruptions, as well as provisions for off-site truck staging, scheduling of deliveries during off-peak periods, and maintenance of pedestrian and school crossings in consultation with LADOT. To the extent construction of the Project overlaps with special events, such as the Olympics, the CTMP would be updated to reflect event schedules, traffic control measures, and coordination with City agencies to maintain emergency access and safe travel conditions. Implementation of MM-TRA-B would ensure that any Project-related construction during the LA28 would be carefully managed, and the associated construction-related traffic impacts would remain less than significant.

Transportation Alternatives: Metro and the City of Los Angeles have been conducting transportation and other planning activities in preparation for LA28. These include Metro's Supplemental Bus System and 28x2028 Plan. These transit projects are separate from the Project and are not mutually exclusive but the 28x2028 projects are not feasible alternatives to the proposed Project. Increasing and improving options for public transit throughout Southern California, as well as biking and pedestrian connectivity, benefits the community.

Metro's Supplemental Bus System (SBS) is a temporary supplementary transit system created to augment the existing public transit system to ensure that spectators and the workforce have efficient and reliable transit for travel to and from venues during LA28. By comparison, the proposed Project is not a temporary transit system intended to provide additional transit for LA28. Similarly, in anticipation of hosting LA28, Metro approved a list of 28 projects, totaling $20 billion and targeted for delivery by 2028 (28x2028). These projects include improvements to Metro's light rail lines, new pedestrian and bike paths, bus electrification, and bus service expansion. Like SBS, 28x2028 is intended to provide additional connectivity to major sports venues for LA28. As a result, these transit options would not meet many of the proposed Project objectives, including, but not limited to, Objective 1 (expand mobility options for transit riders through a direct connection between LAUS and Dodger Stadium); Objective 2 (attract new transit riders to the Metro system through a unique experience of an aerial transit system connecting to Dodger Stadium); Objective 3 (improve the Dodger Stadium visitor experience by providing efficient, high-capacity, and faster alternative access to Dodger Stadium); Objective 7 (improve transit rider experience by providing unique scenic views of the Los Angeles area to ART passengers and Dodger fans); and Objective 12 (provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality).

As discussed in Section 4.0, *Alternatives*, of the Draft LA ART EIR, and Topical Response H*, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options*, of the Final EIR, alternatives have been considered to explore potential means to mitigate or avoid the significant environmental impacts associated with the proposed Project, while still achieving the primary objectives of the proposed Project. These included bus electrification, enhanced pedestrian and bike facilities, and expanded bus service. CEQA Guidelines Section 15126.6(a) provides that an EIR shall describe a reasonable range of alternatives that would feasibly attain most of the basic project objectives but would avoid or substantially lessen one or more of the significant environmental effects. As set forth in Section 2.0, *Project Description*, of the Draft EIR, the overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system, and improve connectivity for the surrounding communities.

In sum, the proposed Project is not proposed as a temporary transit option for LA28. Therefore, new information concerning temporary transportation alternatives for LA28 does not alter the LA ART EIR's analysis and conclusions regarding feasible alternatives.

City of Los Angeles Transportation Study

In March 2024, the City Council of the City of Los Angeles adopted a motion authorizing a traffic assessment on community impact zones around Dodger Stadium, including Solano Canyon, Elysian Valley, Chinatown, Angelino Heights, and Echo Park.[8] In July 2025, LADOT issued a request for proposals for the preparation of the traffic study, which is to include an analysis of traffic data, traffic patterns, origin-destinations, and transportation operations during event day operations at Dodger Stadium as compared to non-event day scenarios.[9] In addition, the study is to include recommendations on measures and strategies to encourage multi-modal travel to Dodger Stadium. The study is focused on Dodger Stadium events and transportation options within the City for reducing transportation-related impacts to surrounding communities. The study is not specific to the proposed Project. The results of the study are not available and not anticipated until the second half of 2026. At this time, the scope of the transportation options to be studied and what the study may conclude about those options are unknown. CEQA does not require speculation (CEQA Guidelines, § 15145), and the fact that the City intends to conduct additional traffic assessments does not alter the validity of the LA ART EIR's transportation or alternatives analyses.

The City Council's motion incorrectly states that no traffic studies concerning Dodger Stadium have been performed since 1990. The LA ART EIR assessed transportation conditions in the vicinity of Dodger Stadium Refer to Section 3.17, *Transportation*, of the Draft LA ART EIR. For the LA ART EIR, a Transportation Assessment Memorandum of Understanding[10] ("MOU") was prepared and approved by the City of Los Angeles Department of Transportation ("LADOT"), in accordance with LADOT's procedures and *Transportation Assessment Guidelines*. The MOU is included as Appendix A to the report entitled *Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment*. In addition, LADOT issued a memorandum regarding the Transportation Assessment for the Proposed Los Angeles Aerial Rapid Transit Project Located Between Union Station and Dodger Stadium on September 27, 2022.[11] The ridership model for the Draft LA ART EIR was developed and validated to Los Angeles conditions with data specific to Dodger Stadium. Moreover, a report entitled *Los Angeles Aerial Rapid Transit Project, Non CEQA Transportation Assessment* was prepared for the proposed Project in accordance with the LADOT *Transportation Assessment Guidelines* (TAG) Informational Report.[12] As set forth in the TAG, the

8 See City of Los Angeles, City Council Motion (March 2024).
9 See 2025 LADOT Request for Proposals.
10 Transportation Assessment Memorandum of Understanding (May 17, 2022).
11 Los Angeles Department of Transportation, Memorandum Regarding Transportation Assessment for the Proposed Los Angeles Aerial Rapid Transit Project Located Between Union Station and Dodger Stadium (September 27, 2022).
12 Fehr & Peers, Los Angeles Aerial Rapid Transit Project Non CEQA Transportation Assessment (September 2022).

Assessment includes non-CEQA transportation analysis related to access, circulation, construction, and cut through traffic. Metro hired Stantec to peer review the transportation analyses conducted for the Project, including Section 3.17 of the Draft LA ART EIR and the Ridership Model Development Memorandum in Appendix N of the Draft LA ART EIR. As described in the Final LA ART EIR (page 6.0-135), Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and they agreed with the ridership forecasts in the Draft LA ART EIR page 6.0-135), Stantec concluded that the proposed Project ridership forecasting model and the model inputs and data sources were credible, defendable, and appropriate to use for the analysis and they agreed with the ridership forecasts in the Draft LA ART EIR.

The LA ART EIR reflects Metro's consultation with the City, as a Responsible Agency, as discussed in Topical Response D, *Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies,* of the Final EIR. Metro's consultation with the City will continue throughout the course of its environmental review process. The City, as a Responsible Agency, will then conduct its own discretionary review process for the Project approvals for which it is responsible.

<u>*Wildfire*</u>

California Department of Forestry and Fire Protection (Cal Fire) Fire Hazard Severity Zone (FHSZ) Maps

Cal Fire updated its FHSZ maps in March 2025. A Supplemental Wildland Fire Hazard Assessment was prepared by REAX in November 2025 (REAX 2025 Report).[13]

The LA ART EIR identified that the Dodger Stadium Station, the Stadium Tower, and the Broadway Junction were within a zone mapped Very High Fire Hazard Severity Zones (VHFHSZ) based on the then applicable FHSZ maps. The updated 2025 FHSZ map changed the boundaries of the high and very high FHSZ. As a result, the Chinatown/State Park Station, which previously was not in a FHSZ, is now partially within a zone mapped as a High Fire Hazard Severity Zone (HFHSZ) and partially within a zone mapped as VHFHSZ. The updated 2025 FHSZ map changed the boundaries of the high and very high FHSZ. As a result, the Chinatown/State Park Station, which previously was not in a FHSZ, is now partially within a zone mapped as a High Fire Hazard Severity Zone (HFHSZ) and partially within a zone mapped as VHFHSZ.

As detailed in the REAX 2025 Report, construction of the Chinatown/State Park Station would have a less than significant potential to exacerbate wildfire risks because construction activities would comply with applicable regulatory standards and industry best practices designed to prevent ignition. The Chinatown/State Park Station and its surroundings are almost entirely developed urban marked by areas that include institutional, commercial, and residential uses, as well as the southernmost entrance to the Los Angeles State Historic Park. The Chinatown/State Park Station does not include a material amount of vegetation and is bounded by the light rail line and a large commercial development to the west, North Spring Street and commercial development to the east, and commercial and transportation uses to the south. Construction and operation at the site connect with a small area of vegetation at the southern tip of LASHP, which itself is separated from more heavily vegetated areas to the west by the light rail line and North Broadway. As noted in the LA ART EIR, vegetation in LASHP is composed of low grasses and well-spaced trees planted in accordance with a landscaping program and present a low hazard of carrying fire. Additionally, several of the trees near the Chinatown/State Park Station and along the Project's alignment

13 2025. REAX Engineering. Supplemental Wildland Fire Hazard Assessment – Prepared for the Los Angeles Aerial Rapid Transit Supplemental Final Environmental Impact Report.

in LASHP would be removed prior to the start of construction, which would further reduce the already low risk of carrying fire.

The proposed Project would also include project design features in WFR-PDF-A and WFR-PDF-B prior to and during construction and WFR-PDF-C during operations to ensure fire prevention and safety are integrated into Project design and implementation. WFR-PDF A and WFR-PDF-C would be applicable to Chinatown/State Park Station. Applying the existing PDFs from the LA ART EIR to the Chinatown/State Park Station would represent industry standard practice during construction and operations and would adequately ensure fire-spread risk is less than significant. As such, the updated Cal Fire FHSZ Maps do not result in new or substantially more severe wildfire impacts, and the conclusions of the LA ART EIR regarding wildfire risk remain valid.[14]

Wildfire Project Design Features

The LA ART EIR includes project design features in WFR-PDF-A and WFR-PDF-B prior to and during construction and WFR-PDF-C during operations to ensure fire prevention and safety are integrated into Project design and implementation. Since certification of the original LA ART Final EIR, Cal Fire updated its FHSZ Maps to designate the Chinatown/State Park Station as being partially within a VHFHSZ and partially within a HFHSZ. The Final SEIR therefore revises WFR-PDF-A to require the implementation of the Fire Protection Plan during construction of the Chinatown/State Park Station and WFR-PDF-C to require security monitoring by staff and cameras during operation of the Chinatown/State Park Station. The LA ART EIR analyzed the Project's potential wildfire risks and concluded such impacts would be less than significant. As such, the updated project design features do not result in new or substantially more severe wildfire impacts, and the conclusions of the LA ART EIR regarding wildfire risk remain valid.[15]

Cumulative Impact Analysis

Since certification of the original LA ART Final EIR, new related projects have been proposed or approved within proximity of the proposed Project, as identified in Table 3-2.

Table 3-2 New Cumulative Projects

Project Name and Address	Description	Size
Mixed-Use 511 N. Grand Ave.	Apartments	299 du
	Retail	8,000 sf
Ferrante 1000 W. Temple St.	Apartments	1,500 du
	Retail	30,000 sf
Sunset Boulevard Mixed-Use (Holy Hill Mixed-Use) 1111 W. Sunset Blvd.	Apartments	737 du
	Hotel	180 rm
	Hotel Retail	10,000 sf

[14] 2025. Reax. Supplemental Wildland Fire Hazard Assessment.
[15] 2025. Reax. Supplemental Wildland Fire Hazard Assessment.

Project Name and Address	Description	Size
	Hotel Restaurant	10,000 sf
	Office	48,000 sf
	Retail/Gym/Grocery	50,000 sf
	Restaurant	25,000 sf
Clean Water Campus Project 303 N. San Fernando Rd.	Office	150,000 sf
Stadium Way and Chavez Ravine Apartments 959 E. Stadium Way	Apartments	237 du
	Affordable Housing	30 du
Pagoda Hotel 995 N. Broadway	Hotel	101 rm
	Restaurant	6,211 sf
1011 North Broadway 1009-1015 N. Broadway	Hotel	92 rm
	Restaurant	1,713 sf
	Café/Retail	895 sf
	Café	978 sf
1635 North Main Street 1635 N. Main St.	Office	140,000 sf
	Retail	5,000 sf
	Restaurant	8,000 sf
College Street Residential Project 871 N. Figueroa Ter.	Apartments	153 du
	Affordable Housing	17 du
950 Stadium Way Residential 950 E. Stadium Way	Apartments	57 du
	Affordable Housing	8 du
130 College Office Project 130 W. College Street	Office	224,597 sf
	Retail	4,110 sf
	Restaurant	5,894 sf
Notes: du = dwelling unit sf = square feet rm = room		

Of these, three are within approximately 1,000 feet of the Project alignment: 130 West College Street (224,597 sf office, 4,110 sf retail, 5,894 sf restaurant); 995 North Broadway (101-room hotel, 6,211 sf restaurant); and 1011 North Broadway (92-room hotel, 1,713 sf restaurant, 895 sf retail, 978 sf café).

Consistent with the limited scope of this SEIR, the discussion below addresses whether any of the new related projects identified in Table 3-2 presents new information that would materially change the cumulative impact conclusions of the LA ART EIR. As explained below with respect to each topic, the new projects would not combine with the proposed Project and other past, present or reasonably probable future projects to result in new or substantially more severe cumulative impacts than disclosed in the LA ART EIR. Therefore, the addition of these new projects does not trigger further environmental review under CEQA.

Aesthetics

As described in Section 5.2.1 of the Draft LA ART EIR, the cumulative aesthetic impact analysis considered the visual character of the local Project vicinity and included various mixed-use, residential, and circulation projects. No designated scenic vistas are located in the area of potential impact studied in the EIR. Although the proposed Project and related projects have the potential to result in a significant cumulative impact to views of the Downtown Los Angeles skyline from public vantage points, the views of the Downtown Los Angeles skyline are not designated as scenic vistas. Moreover, the proposed Project would not interrupt scenic or panoramic views of the Downtown Los Angeles skyline, as views of the skyline would remain available from prominent view locations, such as park areas, or other sections along local streets, and, as such, would not contribute to a cumulative view impact related to scenic vistas. The LA ART EIR therefore concluded that the proposed Project's contribution to the cumulative impact to scenic vistas would not be cumulatively considerable.

The new related projects are similar in type and scale, consisting principally of infill mixed-use, residential and commercial developments that are consistent with the existing urban environment. These projects would be subject to the same City design standards, zoning regulations, and environmental review processes considered in the LA ART EIR, all of which ensure that new development remains compatible with the area's visual character. Because the proposed Project has not changed and the additional related projects would be governed by the same regulatory framework as the projects analyzed in the LA ART EIR, the prior conclusion that the proposed Project's incremental contribution to cumulative impacts to scenic vistas would not be cumulatively considerable remains valid.

Agriculture and Forestry Resources

As discussed in Sections 3.2 and 5.2.2 of the Draft LA ART EIR, the Project alignment and surrounding area are fully urbanized and contain no lands in active agricultural or forestry use. There are no Williamson Act contracts within Los Angeles County, and no forest lands or timber resources in the cumulative study area. Although the proposed Stadium Tower and Dodger Stadium Station sites are zoned A1 (Agricultural), the A1 Zone permits a range of urban uses, including single-family residences, parks, and public facilities. These sites are developed with existing stadium facilities, paved parking areas, and landscaped slopes, and are subject to a Conditional Use Permit authorizing operation of a Major League Baseball stadium and associated uses, including mass transit facilities. Accordingly, the EIR concluded that cumulative impacts related to the conversion of farmland or forest land would be less than significant.

The new related projects are also located within urbanized and developed areas in the City of Los Angeles and do not involve lands designated, zoned, or used for agricultural or forestry purposes. None of the new related projects are zoned for agricultural use. Because neither the Project nor the new related projects would result in the conversion of farmland or forest land, or otherwise affect agricultural or forestry resources, the prior determination that cumulative impacts would be less than significant remains valid.

Air Quality

As described in Section 5.2.3 of the Draft LA ART EIR, the cumulative air quality analysis followed South Coast Air Quality Management District (SCAQMD) guidance, which provides that if a project exceeds the SCAQMD's recommended significance thresholds for project-specific impacts, then the project is considered to have a cumulatively significant air quality impact. The EIR determined that the Project's maximum daily construction and operational emissions would not exceed SCAQMD's regional or localized significance thresholds for any criteria pollutants. It also found that the proposed Project would be consistent with SCAG's 2016-2040 RTP/SCS and Connect SoCal, and the SCAQMD 2016 Air Quality Management Plan. Further, it concluded that the Project would not exceed SCAQMD's thresholds for toxic air contaminants, including Maximum Incremental Cancer Risk, Chronic Hazard Index, or cancer burden. Therefore, the Project would not make a cumulatively considerable contribution to air quality impacts.

The new related projects are primarily infill and mixed-use developments that will be subject to project-level CEQA review, including review under SCAQMD thresholds. These projects would likewise be subject to SCAQMD's project-level thresholds and would be required to demonstrate consistency with applicable regional air quality plans through their own CEQA review. Because these additional projects are of a similar type, scale, and intensity as those already considered in the LA ART EIR, their inclusion in the cumulative list does not alter the prior analysis or demonstrate that Basin-wide emissions would increase beyond those previously evaluated. The proposed Project has not changed and the prior conclusion that the proposed Project's incremental contribution to cumulative air quality impacts would be less than cumulatively considerable remains valid.

Biological Resources

The EIR determined that the proposed Project, in combination with related cumulative projects, would not result in a significant cumulative impact on biological resources. As described in Section 3.4 of the Draft LA ART EIR, the proposed Project is located within a fully urbanized area of the City of Los Angeles that lacks wildlife corridors, native plant communities, sensitive natural communities, or suitable habitat for special-status species. The proposed Project would also comply with the City of Los Angeles' Native Tree Protection Ordinance and permitting requirements of the California Department of Parks and Recreation and would also incorporate standard best management practices and mitigation measures, to avoid or minimize potential impacts to nesting birds and roosting bats.

The new related projects are likewise located in developed, urban areas that are unlikely to contain suitable habitat for special-status species and sensitive natural communities. These projects would also be subject to applicable federal, state, and local regulations governing biological resources, including the federal Migratory Bird Treaty Act, CEQA, the City's Native Tree Protection Ordinance, as well as review by the City's Urban Forestry Division for any tree removal affecting nesting birds and roosting bats. Because these new projects are of a similar type, scale, and setting as those previously considered in the LA ART EIR, their inclusion in the cumulative analysis does not alter the EIR's conclusion that cumulative impacts to biological resources would be less than significant.

Cultural Resources

As described in Section 5.2.5 of the Draft LA ART EIR, the cumulative setting for cultural resources encompasses the urbanized and developed City of Los Angeles, where past and ongoing development has substantially altered the historic and archaeological context of the area. The EIR found that, although the proposed Project in combination with other related projects would introduce additional modern features into this already modified setting, those changes would not materially impair the integrity or eligibility of identified historical resources. Accordingly, the LA ART EIR determined that cumulative impacts to historical resources would be less than significant, and the and the Project's incremental contribution would not be cumulatively considerable. The Draft LA ART EIR also found that cumulative impacts to archaeological resources would be less than significant because the Project area and surrounding vicinity have been extensively disturbed by past urban development, and standard unanticipated-discovery procedures and mitigation measures would ensure that any isolated finds are appropriately managed.

The new related projects include infill mixed-use, residential and transportation-related development and are similar in type, scale, and location to those previously analyzed. These projects would also be subject to federal, state, and local requirements for historic-resource protection, including conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, where applicable. None of the new related projects are expected to introduce additional visual, vibratory, or physical effects that would materially alter the setting or integrity of the historical resources evaluated in the LA ART EIR.

The new related projects are also located in previously disturbed, developed areas and would be required to implement comparable measures to address archaeological resources under Public Resources Code Section 21083.2 and City conditions of approval, including halting work and retaining a qualified archaeologist if cultural materials are encountered. Given the disturbed nature of the cumulative study area and the regulatory protections in place, the addition of these new projects does not alter the prior conclusion that cumulative impacts to archaeological resources would be less than significant.

Because the proposed Project has not changed, and the new related projects are consistent with the development context and regulatory framework already analyzed, the LA ART EIR's finding that cumulative impacts would be less than significant and that the Project would not make a cumulatively considerable contribution to such impacts, remains valid.

Energy

The Draft LA ART EIR concluded that both project-specific and cumulative energy impacts would be less than significant. As described in Sections 3.6 and 5.2.6 of the Draft LA ART EIR, construction of the proposed Project would require electricity and fuel, but those demands would not be wasteful, inefficient, or unnecessary. During operation, the proposed Project would encourage a mode shift from passenger vehicles to public transit, thereby reducing regional fuel consumption and resulting in a long-term beneficial energy impact.

The new related projects are primarily infill development and are within the same urbanized area as the related projects analyzed in the EIR. These projects would be required to comply with state and local energy efficiency standards, such as California's Building Energy Efficiency Standards (Title 24, Part 6), the California Green Building Standards Codes (CALGreen), and the City of Los Angeles Green Building Ordinance. Because the new related projects would incorporate modern building and transportation efficiency measures and would not introduce new large-scale industrial or energy-intensive land uses, their inclusion does not alter the cumulative energy context considered in the LA ART EIR. The proposed Project has not changed, and the previously recognized cumulative effect of the Project would remain unchanged and less than significant.

Geology and Soils

As described in Section 5.2.7 of the Draft LA ART EIR, the geographic scope for the analysis of cumulative impacts related to geologic resources and soils encompasses the immediate Project vicinity. Site-specific development projects within the City of Los Angeles are subject to uniform site-development policies and construction standards that are based on the State requirements in the California Building Code (CBC), the City of Los Angeles Municipal Code regulations related to geology and soils, and site-specific geotechnical studies prepared to define site-specific conditions that might pose a risk to safety. While increases in the number of people and structures subject to unstable geologic units and soils would increase in the Project area with development from related projects, including the new related project, given the application of CBC and LAMC requirements by the City through the construction permitting process, the project-specific and cumulative effects of development related to geologic hazards and unstable soils, including landslides, lateral spreading, subsidence, liquefaction, movement, or collapse, would be less than significant. Accordingly, that cumulative impacts would be less than significant remains valid.

Greenhouse Gas Emissions

As described in Section 5.2.8 of the Draft LA ART EIR, GHG emission impacts are inherently cumulative in nature. The EIR found that the proposed Project's incremental contribution to cumulative GHG emission impacts would not be cumulatively considerable, because the Project would reduce regional GHG emissions relative to baseline conditions by encouraging a mode shift from passenger vehicles to public transit. The new related projects would be subject to GHG reduction measures, including the California Building Energy Efficiency Standards (Title 24), CALGreen Code, and would require individual environmental clearances, including requirements to mitigate significant GHG emission impacts. The inclusion of these projects does not alter the EIR's prior determination. The proposed Project has not changed, and its incremental contribution to cumulative GHG emission impacts remains less than cumulatively considerable.

Hazards and Hazardous Materials

As described in Section 5.2.9 of the Draft LA ART EIR, cumulative impacts related to hazardous materials could occur if development in the area, when combined with the proposed Project, were to increase the potential for human exposure to contamination from historic or ongoing land uses. The Draft LA ART EIR determined that compliance with applicable federal, State, and local regulations governing the handling, transport, storage, and disposal of hazardous materials would ensure that cumulative impacts would be less than significant. The new related projects consist primarily of infill mixed use and residential developments and do not include industrial uses or other activities that would result in the use or discharge of unregulated hazardous materials. All hazardous materials users and transporters, as well as hazardous waste generators and disposers, are subject to regulations that require proper transport, handling, use, storage, and disposal of such materials to ensure public safety. Similar to the proposed Project, the related projects would be required to incorporate appropriate safety features into their design and construction to minimize the potential for a hazardous materials incident. Because the Project has not changed and the new related projects are subject to the same regulatory framework, their inclusion does not alter the LA ART EIR's impact conclusion. Therefore, cumulative impacts with respect to hazards and hazardous materials would remain less than significant.

Hydrology and Water Quality

As described in Section 5.2.9 of the Draft LA ART EIR, cumulative impacts related to hydrology and water quality were determined to be less than significant. Although new development in the Project vicinity could increase impervious surfaces and stormwater runoff, the area is already highly urbanized and served by an existing storm drain system designed to convey urban runoff. The new related projects are located within the same developed urban area and would be subject to the same stringent federal, state, regional, and local water quality regulations, including the City of Los Angeles Best Management Practices Handbook, the City's Low Impact Development (LID) requirements, and the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, which requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) for construction activities over one acre. Compliance with these requirements would ensure that potential increases in stormwater runoff or pollutant loading are minimized. Because the proposed Project has not changed and the new related projects are governed by the same regulatory framework as those discussed in the LA ART EIR, their inclusion in the cumulative analysis does not alter the EIR's determination. Cumulative effects related to hydrology and water quality remain less than significant.

Land Use and Planning

The LA ART EIR, Section 5.2.11, concluded the cumulative impacts related to land use and planning would be less than significant. The related projects include residential, multi-use, and commercial developments located on already developed parcels within an urbanized area and would not divide established communities. Consistent with the LA ART EIR, the new related projects would be subject to applicable land use and plans, policies, and regulations, including the City of Los Angeles General Plan, zoning code, and other adopted planning documents. Compliance with these governing policies and regulations would ensure that cumulative development remains compatible with existing land uses. Because the proposed Project has not changed and the new related projects would be consistent with the same land use framework previously analyzed, the prior conclusion that cumulative land use and planning impacts would be less than significant remains valid.

Mineral Resources

As discussed in Section 5.2.12 of the Draft LA ART EIR, the Project alignment is not located within an area known to contain mineral resources of regional or statewide value and is not delineated as a locally-important mineral resources recovery site. The EIR therefore concluded that no cumulative impact would occur. The new related projects are likewise not located in areas known to contain significant mineral resources or delineated as locally important mineral resources recovery sites. Therefore, the addition of these new related projects does not alter the LA ART EIR's conclusion, and cumulative impacts related to mineral resources remain less than significant.

Noise

The Court Opinion did not identify any deficiencies in the LA ART EIR's cumulative construction noise and vibration analysis. As discussed in Section 3.13 of the Draft LA ART EIR and Section 3.5 of the Draft SEIR, Project construction would result in significant and unavoidable project-level construction noise impacts. As further described in Section 5.2.13 of the Draft LA ART EIR, if certain related projects were constructed concurrently with the proposed Project, combined construction activities could exceed applicable noise thresholds, resulting in a significant cumulative noise impact. Although implementation of revised Mitigation Measure MM-NOI-A would reduce Project-generated construction noise, noise levels at some locations would remain above applicable thresholds. Therefore, consistent with the conclusion in the LA ART EIR, the Project's incremental contribution to cumulative noise impacts would be cumulatively considerable.

Three of the new related projects identified in Table 3-2 are located within 1,000 feet of the Project alignment: 130 West College Street (224,597 sf office, 4,110 sf retail, 5,894 sf restaurant); 995 North Broadway (101 room hotel, 6,211 sf restaurant); and 1011 North Broadway (92 room hotel, 1,713 sf restaurant, 895 sf retail, 978 sf café).[16] To the extent any of these new related projects are constructed at the same time as the LA ART Project and the other related projects identified in the EIR, the combined construction activities could contribute to the previously recognized significant cumulative construction noise impact. The Project's previously recognized contribution to that impact would remain cumulatively considerable.

As noted in Section 5.2.13 of the Draft EIR, potential additional truck traffic from other concurrent construction projects would not be expected to generate a perceptible cumulative noise increase, because an increase of more than 200 trucks per hour along the haul routes would be required to produce a 5 dBA increase at the closest noise-sensitive receptors. This level of truck traffic from simultaneous construction projects is not logistically practical. Although it is not known whether construction of the three new related projects would overlap with that of the LA ART Project, their combined activity would not reasonably generate that volume of additional truck traffic. Accordingly, the inclusion of these projects would not result in any new or more severe significant cumulative impact from off-site construction activities beyond those already disclosed in the LA ART EIR.

The new related projects are primarily infill and mixed-use developments that will be subject to project-level CEQA review, including review for consistency with the City of Los Angeles noise and vibration thresholds. Because these additional projects are of a similar type, scale, and intensity as those already considered in the LA ART EIR, their inclusion in the cumulative list does not alter the prior analysis or demonstrate that operational-period cumulative noise or vibration levels would increase beyond those previously evaluated. Vibration attenuates with distance and, at 200 feet, vibration levels for the highest vibration-producing equipment for construction of the proposed Project (vibratory rollers) would be less than the most restrictive vibration level (0.12 in/sec PPV), and, therefore, the Project would not impact VSRs beyond 200 feet. The proposed Project has not changed and the prior conclusion that the proposed Project's incremental contribution to cumulative noise and vibration impacts would be less than cumulatively considerable remains valid.

Population and Housing

The Draft LA ART EIR concluded the cumulative impacts related to population and housing would be less than significant. As described in Sections 3.14 and 5.2.14 of the Draft LA ART EIR, the proposed Project is

[16] 1,000 feet is a conservative buffer, as the Draft EIR utilized a 500 foot buffer to define noise sensitive receptors (NSRs). Section 3.13 of the Draft EIR notes, "A construction noise impact analysis was conducted, as discussed in the Noise and Vibration Technical Report (Appendix M), for each Project component during selected worst-case construction phases, evaluating all NSRs within approximately 500 feet of each Project component site. A distance of 500 feet was selected because noise attenuates with distance and it is estimated that, beyond this distance, construction noise levels would generally be expected to be less than the high daytime ambient noise levels in the Project's urban environment. Therefore, the proposed Project would not impact NSRs beyond 500 feet."

not expected to directly or indirectly induce population growth, displace existing people or housing, or necessitate the construction of replacement housing elsewhere. Of the 11 new related projects identified in Table 3-2, six include a residential component that would collectively create a total of 3,308 new dwelling units, while the remaining projects include hotels, restaurants, and office and retail uses. Several of the related projects would result in multi-family housing located in close proximity to public transportation, which is encouraged by both the 2024-2050 RTC/SCS and the City's General Plan. Because the proposed Project has not changed, the prior conclusion that the Project's incremental contribution to cumulative impacts related to population and housing would be less than cumulatively considerable remains valid.

Public Services

The Draft LA ART EIR, Section 5.2.15, determined that the proposed Project and related projects would not increase demand for public services such that new or physically altered facilities would be needed to maintain acceptable service ratios, response times, or other performance objectives. With implementation of Mitigation Measure TRA-B (Construction Traffic Management Plan), the EIR determined that cumulative construction impacts would be less than significant.

The new related projects include residential, mixed-use, and commercial development that would similarly increase demand for public services, including police and fire services. Each of these projects would be required to comply with all applicable state and City requirements regarding fire protection, emergency access, and building safety, and would be subject to review by the Los Angeles Fire Department (LAFD), the Department of Building and Safety, and other relevant City departments. The related projects would also generate tax revenues and development fees that could be used to fund new or expanded public facilities; however, construction of any such facilities would be subject to separate environmental review to ensure that their development would not cause significant environmental impacts.

Because the proposed Project has not changed and the new related projects would comply with the same regulatory requirements described in the LA ART EIR, the prior conclusion that cumulative impacts on public services would be less than significant remains valid.

Recreation

The Draft LA ART EIR, Section 5.2.16, concluded that cumulative impacts related to recreational facilities would be less than significant. The new related projects include residential, mixed-use, and commercial development that could increase demand for parks and recreational facilities. Residential projects among them would likely be subject to the City's Parks Dedication and Fee Update Ordinance, which requires most new residential projects to dedicate land or to pay in-lieu fees for the development or improvement of park and recreational facilities. The development of new or expanded recreational facilities funded by these fees would undergo separate environmental review to ensure that any associated construction would not cause significant physical environmental effects. Related projects would also be required to comply with applicable community plans and regulatory requirements regarding recreational facilities. Because the proposed Project has not changed and the new related projects would comply with the same regulatory requirements considered in the LA ART EIR, the prior conclusion that cumulative impacts related to recreation would be less than significant remains valid.

Transportation

The Draft LA ART EIR concluded that cumulative impacts related to transportation would be less than significant. As explained in Section 5.2.17 of the LA ART Draft EIR, as the proposed Project would have a less than significant VMT impact, no cumulative VMT impacts would occur per the LADOT Transportation Assessment Guidelines. The new related projects would generate vehicle trips during construction and operation, but all such projects must comply with applicable Manual on Uniform Traffic Control Devices (MUTCD) and LADOT requirements for traffic management and construction staging. Each related project would also be required to evaluate potential VMT impacts and implement any necessary mitigation measures to reduce substantial VMT generation. Because the proposed Project has not changed and the new related projects would be subject to the same regulatory requirements and transportation analysis standards considered in the LA ART EIR, the prior conclusion that cumulative transportation impacts would be less than significant remains valid.

Tribal Cultural Resources

Ground-disturbing activities associated with the proposed Project and related projects in the immediate vicinity could result in a significant cumulative impact on tribal cultural resources. As concluded in Sections 3.18 and 5.2.18 of the Draft LA ART EIR, project-specific and cumulative impacts related to a substantial adverse change in the significance of a tribal cultural resource would be less than significant with implementation of Mitigation Measure CUL-A. That measure requires preparation of Cultural Resources Monitoring and Mitigation Plan (CRMMP), which would identify a Native American monitor to be present during ground-disturbing activities and would set forth procedures to be followed in the event of unanticipated discovery.

The new related projects within the vicinity of the alignment are likewise subject to with applicable state, federal, and local regulations for tribal cultural consultation and protection of tribal cultural resources. Because the proposed Project has not changed and the new related projects would be subject to the same regulatory requirements, the LA ART EIR's prior conclusion remains valid. Cumulative impacts related to tribal cultural resources would continue to be less than significant with mitigation.

Utilities and Service Systems

The Draft LA ART EIR, Section 5.2.19, concluded that cumulative impacts related to utilities and service systems would be less than significant. The new related projects within the Project area include infill residential, mixed-use, and commercial developments that would increase demand for water, wastewater, electricity, and solid waste services. Each of these projects would be required to comply with appliable City and State water conservation requirements, as well as all City and County waste diversion goals and policies. As described in Section 5.2.19 of the Draft LA ART EIR, existing municipal systems are planned and managed to accommodate projected urban growth. Because the proposed Project has not changed and the additional related projects would be served by the same public utility providers operating under existing regulatory frameworks, the LA ART EIR's prior conclusion that cumulative impacts related to utilities and service system would be less than significant remains valid.

Wildfire

The LA ART EIR, Section 5.2.20, evaluated cumulative wildfire risks within the Project vicinity and concluded the cumulative impacts would be less than significant. Although new related projects located within the VHFHSZ could, in combination with the proposed Project, contribute to wildfire risks, the

Project area and most related project sites are already surrounded by low-rise residential and commercial developments. As discussed in Sections 3.20 and 5.2.20 of the Draft LA ART EIR, four LAFD stations are within approximately 1.6-mile radius of the Project Study Area, which would allow for rapid response times. Further, due to the urbanized nature of the Project vicinity and the lack of substantial vegetative fuel near the related projects, the new related projects would not substantially increase wildfire risk. Because the proposed Project has not changed and the new related projects are located within the same developed, low-fuel environment analyzed in the LA ART EIR, the prior conclusion that cumulative wildfire impacts would be less than significant remains valid.

3.2.5 Topical Response 5: CEQA Process for the Draft SEIR

Some comments raise questions about Metro's compliance with CEQA's procedural requirements in preparing and circulating the Draft SEIR. The Draft SEIR was prepared in accordance with CEQA and consistent with the scope defined by the Superior Court's writ of mandate. The Draft SEIR appropriately focused on construction noise mitigation while incorporating by reference the analysis and findings of the prior LA ART EIR. The document is organized and presented consistent with CEQA's goal of providing clear, concise, and focused information to decisionmakers and the public. The supporting AECOM Acoustic Technical Report was provided in the appendices to ensure full transparency and allow interested members of the public to review the information underlying the Draft SEIR's analysis.

On September 29, 2025, Metro released the Draft SEIR for a 45-day public review period that concluded on November 13, 2025. This circulation followed Metro's earlier consultation request to SMMC, which was issued on July 30, 2025, as discussed in Topical Response 2. The Draft SEIR's 45-day public review period is consistent with CEQA Guidelines Section 15105(a), which requires a minimum of 30 days and at least 45 days for projects, such as the proposed Project, that require review by State agencies. Neither CEQA nor the CEQA Guidelines require a lead agency to extend a public review period for an environmental document upon request. Metro, as Lead Agency, determined that the 45-day period provided adequate opportunity for public and agency review of and comment on the Draft SEIR.

The Project is proceeding under Public Resources Code Section 21168.6.9 (also known as SB 44), which provides for streamlined judicial review of certain transit projects that operate at zero emissions, reduce greenhouse gas emissions, and reduce vehicle miles traveled, known as "environmental leadership transit projects." Appendix B of the Draft SEIR provides the text of Section 21168.6.9. Under Section 21168.6.9(e)(3) and (e)(4), the Lead Agency must: (1) conduct an informational workshop to present the key analyses and conclusions of the Draft EIR within 10 calendar days of its release; and (2) hold a public hearing to receive testimony on the Draft EIR. The statute does not prescribe the format of these meetings or require that they be conducted in-person. Consistent with these provisions, Metro conducted an informational workshop that presented the key analyses and conclusions of the Draft EIR on October 9, 2025, which was attended by 26 individuals, and a public hearing on November 6, 2025, which was attended by 169 individuals. Testimony from the public was received during the public hearing. Both meetings were accessible via an online link or by telephone and offered simultaneous interpretation in Spanish, Cantonese, Taishanese, and Mandarin to ensure accessibility for non-English speakers. CEQA does not require lead agencies to hold in-person meetings. Moreover, CEQA Guidelines Section 15201 does not require lead agencies to hold hearings at any stage of the environmental review process.

In addition to conducting the informational workshop and public hearing, Metro posted the presentations and recordings of both meetings on its website for on-demand viewing at any time (https://www.metro.net/projects/aerial-rapid-transit/). The presentations are provided in English Spanish, Chinese (Traditional), and Chinese (Simplified). A transcript of the November 6, 2025, public hearing is included in this Final SEIR as Appendix C. The Notice of Availability (NOA) for the Draft SEIR was also translated into these languages and distributed via mail and posted online on September 29, 2025. The NOA provided information about how to participate in the informational workshop and public hearing for the SEIR, consistent with Metro's standard procedures and Public Resource Code Section 21168.6.9. The NOA and notice of the informational workshop and public hearing was also published in the *Los Angeles Times*, *Los Angeles Sentinel*, *La Opinión*, and *Sing Tao* newspapers.

Further, to ensure in-person access to materials, hard copies of the LA ART EIR and the Draft SEIR were made available for public review at four libraries within the Project area, as identified in the NOA. To maximize public participation, Metro accepted public comments on the Draft SEIR through multiple methods, including by email, postal mail, voicemail and by live testimony at the noticed public hearing. Metro Interpretation services were available during the informational workshops and the public hearing. Comments in any language were accepted during the comment period.

Metro also complied with the posting requirements of Public Resources Code Section 21168.6.9(f)(2). Under that statute, the obligation to post documents in a "readily accessible electronic format" is triggered by the release of a draft EIR and applies to documents relied upon in preparing that draft and to documents added to the record after its release. Because the LA ART EIR was previously certified, Section 21168.6.9(f)(2) did not require Metro to continue posting documents during the period between certification of the LA ART EIR and the release of the Draft SEIR. The statutory posting obligations resumed when Metro released the Draft SEIR on September 29, 2025. Consistent with Section 21168.6.9(f)(2), Metro began posting documents relied on in preparing the Draft SEIR within three business days of its release. The statute does not require continuous posting of all project communications prior to circulation of a draft EIR, nor does it require real-time posting of correspondence.

All documents required to be made available under Section 21168.6.9 following release of the Draft SEIR, including Metro's request for consultation to SMMC dated July 30, 2025, have been posted within the statutory deadlines, and the Project's "SB 44 website" is current and complete. Comments suggesting that Metro has not timely posted documents to the "SB 44 website" are mistaken.

Some comments asserted that Metro improperly limited the public's ability to comment by stating that comments should be limited to Metro's actions in response to the Court Opinion and the analysis in Section 3.0 of the Draft SEIR. The Draft SEIR was circulated for public review consistent with the Court of Appeal's decision and with CEQA's requirements for a limited supplemental EIR. The Draft SEIR's statement that commenters should focus on the supplemental analysis reflects CEQA established practice and was intended to assist readers by identifying the portions of the environmental analysis that had been revised and recirculated. The Draft SEIR did not state that commenters must limit their input, and nothing in the document prevented commenters from raising any topic of their choosing. In practice, commenters submitted a wide range of comments, including many on subjects unrelated to construction noise or trustee-agency consultation, and Metro accepted all such comments. Each comment submitted during the comment period was included in the Final SEIR, and Metro provided individualized responses to comments addressing the adequacy of the supplemental review or that raise new environmental issues, and Metro provided all comments to the decisionmakers. For comments that concern topics outside the scope of the SEIR, Topical Response 1, *Comment Is Outside the Scope of the SEIR*, directs readers to the relevant sections of the LA ART EIR where those issues were addressed.

A comment also asserts that Metro's "published procedures" require a 30-day public review period for written responses to comments. This assertion is based on a misunderstanding. The Metro webpage cited in the comment is informational and summarizes procedures that apply to joint environmental review documents prepared under CEQA and the National Environmental Policy Act (NEPA), including NEPA's 30-day review period for a Final Environmental Impact Statement. That federal requirement does not apply here. The webpage does not establish independent Metro policy and cannot alter CEQA's statutory requirements. For the LA ART Project, which is proceeding under CEQA alone, the governing procedures are those set forth in CEQA and the CEQA Guidelines. Under CEQA, the lead agency must provide proposed written responses to public agencies that commented on the Draft EIR at least 10 days before certification,[1] and Metro will do so. Metro will also provide the Final SEIR, including responses to comments, to the Metro Board and make it available to the public consistent with CEQA and Government Code Section 54957.5. A 30-day comment period on the Final SEIR is not required by CEQA, Metro policy, or any other applicable law.

Metro's efforts here meet and exceed CEQA's procedural requirements for public participation. Metro provided multiple avenues for the public, including non-English speakers, to review and comment upon the Draft SEIR. Accordingly, the public was not deprived of the opportunity to understand or participate in the SEIR process.

1 CEQA Guidelines, § 15088(b).

3.3 Responses to Comments

3.3.1 Response to General Comments on the Project

Comments received raised issues outside the limited scope of the Draft SEIR. As explained in Topical Response 1, *Comment Is Outside the Scope of the SEIR*, the Draft SEIR was prepared to respond to the Court Opinion's direction regarding the adequacy of the LA ART EIR's construction noise mitigation analysis and timely notice of an opportunity for consultation with SMMC. The LA ART EIR's analysis of all other environmental topics was upheld by the Court of Appeal and remains unchanged. Nonetheless, all comments made on the Draft SEIR have been reviewed and will be provided to decision makers for their consideration.

The comments included in this Section 3.3.1 of the Final SEIR provided general comments on the Project or raised issues already covered in the LA ART EIR and that remain unchanged by the Draft SEIR. These general comments are denoted in Table 3-1 by referring readers to this Section of the Final SEIR, and the written general comment letters are included in Appendix B of this Final SEIR. For these general comments, no individual response is warranted and they are responded to collectively here.

The reader is encouraged to refer to the Topical Responses in Section 3.2 of this Final SEIR for the following information:

- Refer to Topical Response 1, *Comment Is Outside the Scope of the SEIR*, for an explanation of the limited scope of this supplemental review and the Court Opinion. As explained there, the Court Opinion does not reopen the full LA ART EIR. Many of the comments referenced broader topics or issues that were already analyzed in the LA ART EIR and that do not present new information or changed circumstances requiring additional environmental review. Topical Response 1 therefore provides a consolidated response to comments that fall outside the scope of the SEIR but nevertheless raise environmental issues or other substantive questions about the proposed Project. Topical Response 1 also directs readers to the portions of the LA ART EIR that address the specific topics raised.

- Refer to Topical Response 2, *Request for Consultation with Santa Monica Mountains Conservancy*, for a discussion of Metro's notice to SMMC, offering SMMC as a trustee agency an opportunity to consult on Metro's environmental review for the proposed Project under CEQA.

- Refer to Topical Response 3, *Construction Noise*, for a discussion of the construction noise mitigation analysis contained in the Draft SEIR and responses to the principal issues and recurring themes raised in public comments on this topic.

- Refer to Topical Response 4, *No Project Changes, Changed Circumstances, or Significant New Information,* for an explanation of why no new information or changed circumstances have been identified that would necessitate additional environmental review under CEQA Guidelines Sections 15088.5 or 15162.

- Refer to Topical Response 5, CEQA Process for the Draft SEIR, for a discussion of the CEQA process followed for this SEIR and the steps Metro undertook to provide meaningful opportunities for public review and participation.

3.3.2 Responses to Comments Received at Public Hearing

A written transcript of the November 6, 2025, virtual public hearing is included as Appendix C of this Final SEIR. Table 3-1 lists all public comments received at the November 6, 2025, virtual public hearing.

Some comments received at the public hearing raised issues outside the limited scope of the Draft SEIR. These comments consisted of general opinions on the proposed Project or issues already addressed in the LA ART EIR and that remain unchanged. Such comments are identified in Table 3-1, which directs readers to Section 3.3.1 of this Final SEIR for a collective response to these general comments.

The following comments received at the November 6, 2025, virtual public hearing are provided with individualized responses because they raised environmental issues relevant to the content of the Draft SEIR or presented new environmental information that could not have been raised prior to certification of the Final LA ART EIR.

Comment PH1 **Helen Campbell**

Response PH1-1 *Refer to Topical Response 3, Construction Noise.*

Response PH1-2 *Refer to Topical Response 5, CEQA Process for the Draft SEIR.*

Comment PH2 **Jon Christensen**

Response PH2-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Response PH2-2 *Refer to Topical Response 2, Request for Consultation with the Santa Monica Mountains Conservancy.*

Response PH2-3 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion of Metro's compliance with AB 52 with respect to the proposed Project.*

Response PH2-4 *Refer to Topical Response 4, No Project Changes, Changed Circumstances, or New Significant Information. See also Response P3-1.*

Comment PH3 **Tany Ling**

Response PH3-1 *Refer to Topical Response 3, Construction Noise.*

Comment PH4 **Sunjana Supekar**

Response PH4-1 *Refer to Topical Response 3, Construction Noise.*

Response PH4-2 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information.*

Comment PH5 **Phyllis Ling**

Response PH5-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. See also Response P3-1.*

Response PH5-2 *Refer to Topical Response 3, Construction Noise.*

Comment PH6 **Chinatown Residents**

Response PH6-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 3, Construction Noise.*

Comment PH7 **Kenny Chan**

Response PH7-1 *Refer to Topical Response 3, Construction Noise.*

Comment PH8 **Robert Reyes Villagomez**

Response PH8-1 *Refer to Topical Response 3, Construction Noise.*

Comment PH9 **Karina Corbera**

Response PH9-1 *Refer to Topical Response 3, Construction Noise.*

Comment PH10 **Elena S.**

Response PH10-1 *Refer to Topical Response 3, Construction Noise.*

Response PH10-2 *Refer to Draft LA ART EIR, Section 3.17, Transportation, for a discussion of the potential impacts of the proposed Project on traffic conditions during construction. As described in Section 2.0, Project Description, of the Draft LA ART EIR, the Stadium Tower would be located on hillside private property, north of Stadium Way between the Downtown Gate and State Route (SR) 110. Dodger Stadium Station would be located in the southeast portion of the Dodger Stadium property near the Downtown Gate. The Stadium Tower and Dodger Stadium Station would be constructed on private property and would not require any road closures (see Draft LA ART EIR, p. 3-17-57; Draft LA ART EIR, Appx. B, Construction Assumptions). Although certain phases of construction of the Stadium Tower and Dodger Stadium Station would require temporary use of the access to the Downtown Gate, the Downtown Gate would not be closed during Dodger games. Construction of the Stadium Tower and Dodger Stadium Station would not require closure of any other gates during Dodger games. Further, Mitigation Measure TRA-B requires the preparation of a detailed Construction Traffic Management Plan (CTMP), which shall be prepared and submitted to the City for review and approval prior to construction. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. Finally, as discussed in Section 3.13, Noise and Vibration, of the Draft LA ART EIR, off-site construction traffic noise impacts would be less than significant.*

Comment PH11 **Charles Thomas**

Response PH11-1 *Refer to Topical Response 3, Construction Noise.*

3.3.3 Responses to Public Agencies Comment Letters

Comment PA1 **Santa Monica Mountains Conservancy**

Response PA1-1 *Metro and the Project Sponsor appreciate the Santa Monica Mountains Conservancy providing comments on the proposed Project Draft SEIR.*

Refer to Section 5.0, Corrections and Additions, of the Final LA ART EIR, for discussion of the Rim of the Valley Trail Corridor Master Plan. As noted therein, while the proposed Project is located within the boundaries of the Rim of the Valley Trail Corridor, the proposed Project would have no impact on the Rim of the Valley Trail, which is located north of Elysian Park, across Interstate 5 (I-5). The proposed Project would provide access to and connectivity between El Pueblo de Los Angeles, Los Angeles State Historic Park (LASHP), and Elysian Park. Refer to Topical Response 3, Construction Noise, for a discussion of the construction noise analysis contained in the Draft SEIR.

Refer to Section 3.13, Noise, and Appendix M, Noise and Vibration Technical Report, of the Draft LA ART EIR, for discussion of the construction and operational noise impacts from the proposed Project, including in LASHP. As detailed therein, construction-related noise impacts would be significant and unavoidable even with implementation of mitigation. Operational noise impacts would be less than significant.

Response PA1-2 *Refer to Comment Letter S2 – California Department of Parks and Recreation and Response S2 in Section 6.0, Responses to Comments, of the Final LA ART EIR for the comments from State Parks on the Draft LA ART EIR and detailed responses to those comments.*

As discussed in Section 3.16, Park and Recreational Facilities, of the Draft LA ART EIR, the construction and operational impacts of the proposed Project would result in less-than-significant impacts to the LASHP under CEQA. The Chinatown/State Park Station would have a footprint of 2,195 square feet in LASHP (~0.1% of the total 32-acre park), and the station canopy would overhang 9,320 square feet of the park (including the 2,195-square-foot footprint). The proposed Project alignment crosses over the westernmost edge of LASHP, adjacent to the existing Metro A Line and the associated overhead catenary system. The proposed Project's required horizontal aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park (~1.4 million square feet), plus an Additional Separation Buffer.

While the Chinatown/State Park Station's footprint would occupy 2,195 square feet within the park, through continued collaboration with State Parks, which has been ongoing and will continue through the General Plan Amendment process, the proposed Project would be fully integrated into the park such that it would add to, rather than take away from, the park's purpose and objectives.

Refer to Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft LA ART EIR, for discussion of the aesthetic impacts of the proposed Project, including those to the LASHP, which would be less than significant. As discussed therein, the Draft LA ART EIR and Visual Impact Assessment specifically addressed and disclosed potential impacts on the visual environment and existing viewsheds of or from the LASHP. Refer to Appendix H.1, Memo Regarding Preparation of KOPs, and Appendix H.2, Supplemental KOPs in Response to Comments, of the Final LA ART EIR, for a discussion of the preparation of the supplemental KOPs and the analysis of the supplemental KOPs, respectively. As demonstrated by the analysis of the simulated views in these supplemental KOPs, views from the park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views. The Draft LA ART EIR also analyzed the proposed Project's consistency with Goals and Guidelines from the Los Angeles State Historic Park General Plan that relate to aesthetics (see pages 3.11-39 to 3.11-41). As detailed in Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft LA ART EIR, consistent with the General Plan's Aesthetic Goal, the proposed Project would protect and enhance scenic viewsheds and features and preserve the visitor's experience of the surrounding landscape by minimizing impacts to aesthetic resources. The proposed Project's design would incorporate appropriate urban design elements at the neighborhood level, preserve natural viewsheds of hillside areas, and protect additional open space and aesthetic resources consistent with policies from the Los Angeles State Historic Park General Plan.

As discussed in Section 5.5.2, Special Events at the Los Angeles State Historic Park, in Section 5.0, Other CEQA Considerations, of the Draft LA ART EIR, with the required clearances and the height at which the cabins would cross over the LASHP, the ability to use the vast majority of the park for special events and activities that use significant airspace (e.g., concerts with tall screens and kite flying) would not be affected by the proposed Project. Additionally, other special events that do not use significant airspace (e.g., craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market) and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. In addition, the access road currently used for event set-up and breakdown would continue to be available for use. The proposed Project could affect the ability to use areas directly beneath the alignment for certain specific special event structures. However, the proposed Project alignment over the park is largely over a hill where it is difficult to stage special events, and the park does not include this area in its planned locations for special events. Due to the location of the proposed Project alignment, which crosses over a small portion of the park not typically used for screens and stages, and because events can still take place under the majority of the proposed Project alignment, the proposed Project does not significantly reduce the event space area within the park or limit the number of people that can attend events at the park. Coordination regarding the operation of special events at the park and the *proposed Project is anticipated to be addressed in operational agreements related to the park.*

Response PA1-3

Refer to Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft LA ART EIR and Appendix G, Supplemental Biological Resources Report, of the Final LA ART EIR for discussion of how impacts to biological resources, including tree removal and replacement, from construction and operations of the proposed Project would be less than significant. Refer to Table 4-2 of Appendix G, Supplemental Biological Resources Report, of the Final LA ART EIR for a summary of the proposed tree removal and replacement requirements.

A total of 250 trees are proposed for removal. As described in the documents referenced above, the proposed Project would implement BIO-PDF-F and adhere to applicable tree replacement ordinances and requirements of the jurisdiction in which each tree is located. Table 4-1 of Appendix G, Supplemental Biological Resources Report, of the Final EIR identifies applicable tree replacement requirements in the City of Los Angeles. As shown in this table, protected trees require a replacement ratio of 4:1, while significant trees require a mitigation ratio of 1:1. Removed "street trees" that occur in the public right-of-way (ROW) are to be replaced at a ratio specified by the Urban Forestry Division—typically a 2:1 ratio. On lands owned or administered by responsible agencies such as California State Parks or Caltrans, replacement ratios are determined through the permit or approval processes required for implementation of the Project. (See Draft LA ART EIR, Section 3.04, p. 3.04-23.) As discussed in Section 3.04 of the Draft LA ART EIR, the proposed Project would provide a minimum replacement ratio of 1:1 for trees removed in the LASHP and a replacement ratio of 1:1 for large trees (≥ 8 inches Diameter at Breast Height (DBH)) removed in the California Department of Transportation's (Caltrans) SR 110 ROW, unless the relevant agency imposes a higher ratio.

As discussed on page 3.4-23, in Section 3.04, Biological Resources, of the Draft LA ART EIR, and in Appendix K.1, Updated Tree Inventory Report, and in Appendix G, Supplemental Biological Resources Report, of the Final LA ART EIR, the removal of 75 trees within the LASHP would require a permit or approval from the California Department of Parks and Recreation, and all existing trees required to be removed on California Department of Parks and Recreation property would be replaced at a minimum 1:1 ratio within the park or as agreed to as part of the approvals required for implementation of the proposed Project from the Department, including the General Plan Amendment. In addition, 6 trees within the ROW located near the LASHP would be replaced at a ratio specified by the Urban Forestry Division, typically at a 2:1 ratio.

With respect to the request for a uniform 10:1 replacement ratio and five-year maintenance and monitoring period, CEQA does not require the lead agency to adopt a single numerical ratio or specific monitoring duration when substantial *evidence shows that the proposed Project would adhere to the replacement standards established by the jurisdictions with authority over the affected trees. The applicable ordinances, permits, and agency conditions already establish performance standards for tree replacement and ongoing care, and the proposed Project must comply with those requirements as part of Project Design Feature BIO-PDF-F. Where the California Department of Parks and Recreation, Caltrans, or the City of Los Angeles impose monitoring obligations through their respective approvals, those requirements would govern.*

A uniform 10:1 ratio or five-year monitoring requirement is not necessary to reduce impacts to a less-than-significant level. The Final LA ART EIR concludes that applicable replacement ratios and stewardship requirements would ensure impacts remain less than significant. Replacement trees would be planted as near to the location of removal as possible. Tree replacement locations would be coordinated with the landowner or party responsible for managing the land, including the City of Los Angeles, California Department of Parks and Recreation, and Caltrans.

Comment PA2 **Los Angeles City Councilmember, District 1**

Response PA2-1 *Refer to Topical Response 5, CEQA Process for the Draft SEIR, for a discussion of the CEQA process followed for this SEIR and the steps Metro undertook to provide meaningful opportunities for public review and participation. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the Draft LA ART addressed environmental justice and how the proposed Project is designed to extend affordable, regional access and mobility options to the communities adjacent to the proposed alignment.*

Response PA2-2 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion regarding the Project Sponsor and funding. Costs and funding of the proposed Project are not a CEQA issue and do not require a response.*

Response PA2-3 *Refer to Topical Response 3, Construction Noise, for discussion regarding the proposed Project's construction noise impacts and proposed mitigation measures. Refer to Response GO4-19 for discussion regarding the reclassification of certain components of original Mitigation Measure NOI-A as Project Design Feature NOI-PDF-B. The Draft SEIR's revisions thus improve the clarity and enforceability of the construction noise commitments by distinguishing between (1) mitigation that produces noise reductions, and (2) operational practices that manage construction activities and maintain consistency with modeled assumptions. In addition, as discussed in Topical Response 3, Construction Noise, in response to comments received on the Draft SEIR, the Project Sponsor has agreed to expand Project Design Feature PDF-NOI-B to include coordination for special and community events and to conduct outreach to residents and small businesses regarding construction activities in multiple languages commonly spoken in the area. Moreover, as a voluntary Project commitment, the Project Sponsor has agreed to provide personal hearing protection devices.*

Response PA2-4 *The LA ART EIR concluded that the proposed Project would not result in any significant unmitigated impacts on the environment other than temporary construction noise and temporary construction vibration (human annoyance) (refer to Section 5.0, Other CEQA Considerations, of the Final LA ART EIR). The proposed Project has no significant operational impacts on the environment, including at Union Station, El Pueblo de Los Angeles, the Los Angeles State Historic Park, and Elysian Park. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the Draft LA ART addressed environmental justice and community features, tree removal and replacement, potential impacts to the Los Angeles State Historic Park, proposed Project operation, and impacts to historic resources. As discussed in Section 2.0, Project Description, Section 3.16, Parks and Recreational Facilities, and Section 5.0, Other CEQA Considerations, of the Draft EIR, the Chinatown/State Park Station would have a footprint of 2,195 square feet in the Los Angeles State Historic Park (~.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. With the required clearances and the height at which the cabins would cross over the Los Angeles State Historic Park, the ability to use the vast majority of the park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. In addition, refer to Section 3.13, Noise, of the Draft LA ART EIR for discussion of the operational noise impacts from the proposed Project. As concluded therein, operational noise impacts, including from the gondola cabins, would be less than significant.*

Response PA2-5 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion regarding the proposed Project's traffic impacts and the UCLA Mobility Lab study.*

Response PA2-6 *The LA ART EIR concluded that the proposed Project would not result in any significant unmitigated impacts on the environment other than from temporary construction noise and temporary construction vibration (human annoyance). The proposed Project has no significant operational impacts on the environment. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the LA ART EIR addressed the proposed Project's potential impacts to historic resources, cultural resources, and transportation, as well as potential Project alternatives (e.g., the Pedestrian Enhancement Alternative). Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion regarding the City of Los Angeles' Transportation Study. As described therein, the City of Los Angeles' study is focused on Dodger Stadium events and transportation options within the City for reducing transportation-related impacts to surrounding communities; it is not specific to the proposed Project.. Refer to Topical Response C, Project Features, of* *the Final EIR, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including pedestrian access enhancements along the proposed Project alignment, including landscape and hardscape improvements, shade structures, and potential seating.*

Response PA2-7 *Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion regarding transportation-related projects and improvements for LA28. As discussed therein, these transit projects are separate from the proposed Project and are not mutually exclusive. Increasing and improving options for public transit throughout Southern California, as well as biking and pedestrian connectivity, benefits the community. In addition, Measure M, including the funding available under the measure, is not significant new information, as Los Angeles County voters approved Measure M in 2016—before Metro certified the LA ART EIR.*

Response PA2-8 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion regarding proposed Project alternatives. The projects identified in this comment are separate from the proposed Project and are not mutually exclusive. Increasing and improving options for public transit throughout Southern California, as well as biking and pedestrian connectivity, benefits the community. As discussed in Section 4.0, Alternatives, of the Draft LA ART EIR, and Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, of the Final LA ART EIR, alternatives have been considered to explore potential means to mitigate or avoid the significant environmental impacts associated with the proposed Project, while still achieving the primary objectives of the proposed Project. These included enhanced pedestrian and bike facilities and expanded bus service. CEQA Guidelines Section 15126.6(a) provides that an EIR shall describe a reasonable range of alternatives that would feasibly attain most of the basic project objectives but would avoid or substantially lessen one or more of the significant environmental effects. As set forth in Section 2.0, Project Description, of the Draft LA ART EIR, the overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities. Therefore, this information concerning planned pedestrian- and bike-related improvements does not alter the LA ART EIR's analysis and conclusions regarding feasible alternatives.*

Response PA2-9 *Refer to Response GO4-20 of this Final SEIR for discussion regarding the City's November 2025 resolution. As discussed therein, the City Council's resolution expresses the policy position of the City's legislative body, but it does not alter Metro's duties as Lead Agency under CEQA to evaluate the proposed Project, respond to comments, and determine whether the SEIR complies with CEQA. If the proposed Project requires future approvals from the City, the City will then exercise its independent authority as a Responsible Agency in deciding whether to issue approvals within its purview.*

3.3.4 Responses to Groups and Organizations Comment Letters

Comment GO1 **LA Parks Alliance**

Response GO1-1 *This comment provides a general introduction to the comments raised in this letter. To the extent it purports to incorporate by reference all comments submitted throughout the administrative process, refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. Regarding the timing or provision of agenda materials including the Final SEIR, refer to Topical Response 5, CEQA Process for the Draft SEIR.*

Response GO1-2 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 5, CEQA Process for the Draft SEIR. Also refer to Response GO1-3.*

Response GO1-3 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 5, CEQA Process for the Draft SEIR. The Draft SEIR was circulated for public review consistent with the Court of Appeal's decision and with CEQA's requirements for a limited supplemental EIR. The Draft SEIR's statement that commenters should focus on the supplemental analysis reflects established CEQA practice and was intended to assist readers by identifying the portions of the environmental analysis that had been revised and recirculated. The Draft SEIR did not state that commenters must limit their input, and nothing in the document prevented commenters from raising any topic of their choosing. In practice, commenters submitted a wide range of comments, including many on subjects unrelated to construction noise or trustee-agency consultation. Metro accepted and reviewed all such comments, included them in this Final SEIR, directed the commenters to the Response to General Comments on the Draft SEIR contained in Section 3.3.1, and provided the comments to the decisionmakers. As explained in Topical Response 1, Comment Is Outside the Scope of the SEIR, the Draft SEIR does not mischaracterize the Court Opinion.*

The public review period proceeded in the same manner as a full draft EIR. The Draft SEIR was publicly circulated for 45 days, all materials were made available online, including on the Project's SB 44 webpage, and Metro received and considered comments from individuals, organizations, and agencies. Metro also held an informational workshop and public hearing on the Draft SEIR, as required by Public Resources Code section 21168.6.9 (SB 44). Both meetings were accessible via an online link or by telephone, and offered simultaneous interpretation in Spanish, Cantonese, Taishanese, and Mandarin to ensure accessibility for non-English speakers. These procedures ensured that interested parties were able to participate fully in the review process.

It should also be noted that CEQA emphasizes the importance of an efficient and orderly environmental review process, particularly for projects proceeding under Public Resources Code section 21168.6.9 (SB 44). The statute, and others, reflect the Legislature's determination that once a draft EIR has been circulated, further *review should remain focused on the portions of the analysis that have actually changed or on new information that could not have been raised previously. This approach promotes clarity for commenters and ensures that the environmental process does not devolve into repeated cycles of review of issues already analyzed (and, as in this case, adjudicated). Consistent with these principles, Metro prepared and circulated a Draft SEIR that addressed the specific issues identified by the Court of Appeal, while continuing to accept and consider all comments received during the public review period.*

Metro also requested consultation with SMMC consistent with the Court Opinion and with CEQA's requirements for consultation with trustee agencies. Additional information is provided in Topical Response 2, Request for Consultation with the Santa Monica Mountains Conservancy. Separately, on November 18, 2025, SMMC submitted a comment letter on the Draft SEIR. In accordance with CEQA, Metro prepared responses to SMMC's comments, which are included in Response PA1-1 through PA1-3 in this Final SEIR.

Response GO1-4 *Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for a discussion of LA28, Metro's proposed temporary transit options for LA28 (including the Supplemental Bus System and 28x2028), and the City of Los Angeles' transportation study. Further, there is no evidence that proposed Project construction would conflict with any ongoing Metro project for LA28. To the extent concurrent construction would occur, also refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for an explanation of why there would be no new or more severe significant cumulative impacts. Metro coordinates with the City of Los Angeles throughout development and implementation of transit projects within the City, including as to LA28. Metro has and will continue to coordinate with the City as to the proposed Project.*

Response GO1-5 *Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, which explains that the proposed Project's stations are not "transit-oriented development stops" within the meaning of SB 79 and that neither SB 79 nor the editorial cited in and attached to the comment letter reflect changes in the legal or factual context that would alter the growth-inducing analysis provided in the LA ART EIR. Exhibit 1 of the comment letter is acknowledged.*

Response GO1-6 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information. Metro conducted Assembly Bill (AB) 52 consultation with eight tribes during preparation of the LA ART EIR, and that process concluded in accordance with statutory requirements. Metro incorporated a number of suggested mitigation measures discussed during consultation with the Gabrieleno Band of Mission Indians - Kizh Nation into Mitigation Measure TCR-A. No changes to the Project and no new information have arisen that would alter the LA ART*

EIR's analysis of tribal cultural resources or trigger renewed consultation. The Koi Nation decision cited in the comment does not change the governing AB 52 requirements or create a new obligation for renewed consultation. Metro mailed the Notice of Availability of the Draft SEIR to the eight previously identified tribes. No Native American tribes provided comments on the Draft SEIR.

Response GO1-7 *Metro requested consultation with SMMC consistent with the Court Opinion and with CEQA's requirements for consultation with trustee agencies. Metro's notice to SMMC fully complied with law. The commenter's statement that SMMC had a "mandatory duty" to consult with Metro on the scope of environmental review is incorrect. Additional information is provided in Topical Response 2, Request for Consultation with the Santa Monica Mountains Conservancy. Separately, on November 18, 2025, SMMC submitted a comment letter on the proposed Project's Draft SEIR. In accordance with CEQA, Metro prepared responses to SMMC's comments, which are included in Response PA1-1 through PA1-3 in this Final SEIR. Exhibit 3 of the comment letter is acknowledged.*

Response GO1-8 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. Proposed Project funding and costs, including tariffs, are not environmental issues evaluated under CEQA; therefore, no further response is required. Although not required, the Final LA ART EIR included information about proposed Project funding. No new information or circumstances have been identified that would trigger additional environmental review under CEQA.*

Response GO1-9 *This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO1-1 through GO1-8.*

Comment GO2 **Sierra Club, Central Group, Angeles Chapter**

Response GO2-1 *This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response GO2-2 through GO2-7. Regarding the commenter's comment letter on the Draft LA ART EIR, see Responses GO12-1 through GO12-28 of the Final LA ART EIR.*

Response GO2-2 *Refer to Topical Response 2, Request for Consultation with the Santa Monica Mountains Conservancy, and Responses GO1-3 and GO1-7, which explain that CEQA does not impose a mandatory duty on SMMC to consult. On November 18, 2025, SMMC submitted a comment letter on the Draft SEIR. Metro's responses to SMMC's comments are included in Response PA1-1 through PA1-3 in this Final SEIR.*

Response GO2-3 *Refer to Topical Response 5, CEQA Process for the Draft SEIR, which explains the various opportunities Metro provided for public involvement throughout the public review process for the Draft SEIR, including the public informational* *workshop, public hearing, and the ways interested parties could submit public comments.*

Response GO2-4 *Refer to Topical Response 5, CEQA Process for the Draft SEIR, which explains that Metro did not improperly limit comments on the Draft SEIR. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, which explains the scope of the SEIR on remand for the Court of Appeal.*

Response GO2-5 *Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, which explains that new information regarding the 2028 Olympic Games does not trigger further environmental review under CEQA.*

Response GO2-6 *Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, which explains that the editorial referenced in the comment does not trigger further environmental review under CEQA.*

Response GO2-7 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's costs and financial analysis. Costs and funding of the proposed Project are not a CEQA issue and do not require a response.*

Response GO2-8 *This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO2-2 through GO2-7.*

Comment GO3 **Los Angeles Conservancy**

Response GO3-1 *This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response GO3-2 through GO3-7.*

Response GO3-2 *As described in Topical Response 3, Construction Noise, proposed Project construction would occur in an urban environment and noise levels would be typical of other construction noise levels in the area. Refer to Topical Response 3, Construction Noise, and Section 2.0, Corrections and Additions, of the Final SEIR, for a discussion of how the measures recommended in this comment have been incorporated into Project Design Feature NOI-PDF-B.*

Refer to Topical Response 3, Construction Noise, for discussion about the Project's anticipated construction noise, and refer to Sections 3.7 and 3.8 of the Draft SEIR and Appendix A of the Draft SEIR for discussion regarding the effectiveness of Mitigation Measure NOI-A. As described therein, fixed and/or stationary construction equipment will be placed away from sensitive noise receptors, including historic resources such as El Pueblo and Union Station. See Figure 3-2 of the Draft SEIR. As described in the Draft SEIR, MM-NOI-A would be partially effective at minimizing temporary construction noise at those receptors. In addition, refer to Topical Response 3, Construction Noise, Section 3.6 of the Draft SEIR, and Appendix A of the Draft SEIR for discussion of considerations for *retrofitting historically significant buildings. As described in the Draft SEIR, retrofitting historically significant structures comes with added considerations.*

Response GO3-3 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for a discussion of the alternatives considered in the LA ART EIR. This comment is generally a duplicate of Comments GO16-5 through GO16-8 in the Final LA ART EIR. See Responses GO16-5 through GO16-8 in the Final LA ART EIR for a discussion of why the TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and therefore is unlikely to achieve the GHG benefits of the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and LASHP.*

Response GO3-4 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for a discussion of the KOPs utilized in the LA ART EIR for before and after photorealistic and true-to-scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. This comment is generally a duplicate of Comments GO16-9 through GO16-14 in the Final LA ART EIR. See Responses GO16-9 through GO16-14 in the Final LA ART EIR for a discussion of why the proposed Project would not block any designated scenic views, alter a designated scenic area, or block panoramic views, and impacts to scenic or panoramic views would be less than significant.*

Response GO3-5 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for a discussion of the Los Angeles State Historic Park General Plan Amendment, benefits to LASHP, and the ability of uses to continue at LASHP. This comment is generally a duplicate of Comment GO16-15 through GO16-18 in the Final LA ART EIR. See Responses GO16-15 through GO16-18 in the Final LA ART EIR for information regarding the California Department of Parks and Recreation's' authority. to grant the necessary approvals for the proposed Project's use of LASHP.*

Response GO3-6 *This comment is generally a duplicate of Comment GO16-19 in the Final LA ART EIR. See Response GO16-19 in the Final LA ART EIR for a discussion of why the proposed Project does not require Federal review, including Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the U.S. Department of Transportation Act. Refer to Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, and Section 4.0, Costs and Financing, of the Final LA ART EIR, which provide detail as to the proposed Project's capital, operation, and maintenance costs and planned sources of funding, recognizing that the proposed Project's capital funding would primarily be sourced from bond financing serviced by revenue from the proposed Project. No public sources of funding have been sought or committed to the proposed Project.*

Response GO3-7 *This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO3-2 through GO3-7.*

Comment GO4 **The California Endowment**

Response GO4-1 *This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response GO4-2 through GO4-23.*

Response GO4-2 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, which explains that the Court of Appeal's disposition directs the trial court to issue a writ requiring Metro to set aside its prior certifications, findings, MMRP, and Project approval, and to complete the supplemental tasks identified in the opinion, including preparation and certification of a supplemental EIR, before taking further steps to reapprove the Project. The Court did not require Metro to complete those actions prior to circulating the Draft SEIR. Decertification of an EIR does not mean that the entire environmental document must be revised or recirculated. Instead, it simply returns the EIR to draft status while the agency completes the required correction.*

Nothing in CEQA prohibits an agency from preparing a supplemental EIR while writ proceedings are pending, so long as the agency completes the required corrective actions before reconsidering the project. Further, in mandamus actions generally, agencies are allowed to voluntarily undertake corrective steps while a writ is being finalized and they may implement the actions required without waiting for formal issuance. Undertaking corrective work in this manner does not predetermine the outcome.

Proceeding with the Draft SEIR while the Writ process was underway is also consistent with public policy supporting timely and efficient environmental review. Public Resources Code section 21168.6.9 (SB 44), which applies to this Project, reflects the Legislature's determination that certain transit projects should advance without unnecessary delay and that CEQA litigation for these projects should be resolved as efficiently as possible. Beginning the limited supplemental analysis directed by the Court, rather than waiting for the issuance of the writ, supports these legislative goals.

Metro's efficient preparation of the Draft SEIR advanced CEQA's purposes without limiting public participation or predetermining the outcome of the Metro Board's future consideration of the Project. The Draft SEIR clearly explained the limited scope of the supplemental review directed by the Court and did not restrict commenters' ability to provide input on any topic. Metro accepted all comments received, including those outside of the supplemental analysis, and has included them in this Final SEIR for consideration by decisionmakers. For additional response to the issues raised in this comment, refer to Topical Response 1, *Comment Is Outside the Scope of the SEIR, and Topical Response 5, CEQA Process for the Draft SEIR.*

Response GO4-3 *Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion of how the 2028 Olympics and the naming of Dodger Stadium as an Olympic venue do not constitute significant new information requiring additional environmental review. Also refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion regarding Joshua Schank's opinion piece. As stated therein, the opinion piece did not state that the Project would result in new housing development at the Dodger Stadium parking lots or anywhere else, or that such development is reasonably foreseeable.*

Response GO4-4 *The Draft SEIR identifies noise-sensitive receptors within 500 feet of each Project component as an initial screening radius. 1060 North Vignes Street is outside of this initial screening buffer distance. The nearest Care First Village building is approximately 559 feet east-southeast from the Alpine Tower, outside the screening buffer. As a result, the analysis instead used three receptors that are substantially closer to the Alpine Tower (all within 100 feet). Evaluating the closer receptors provides a more conservative assessment of construction noise exposure. Further, the Hilda L. Solis Care First Village (1060 North Vignes Street) was constructed in July 2021—prior to release of the Draft LA ART EIR and certification of the Final LA ART EIR. Therefore, the Hilda L. Solis Care First Village does not constitute significant new information that warrants further environmental review. (Refer to AECOM's Supplemental Technical Report for more information).*

Moreover, as explained in the Draft SEIR, AECOM analyzed interior construction noise levels for the noise-sensitive receptor buildings studied in the LA ART EIR. The Draft SEIR discloses anticipated interior construction noise levels at noise-sensitive receptors much closer to the Project alignment. Anticipated interior noise levels from construction at the Hilda L. Solis Care First Village would therefore be expected to be less than the noise levels for buildings closer to the alignment identified in the Draft SEIR.

The Robert K. Ross Center for Hope and Healing (1000 North Alameda Street) has not yet been built. If constructed, it would be built on an existing parking lot at the north end of The California Endowment campus. The California Endowment campus was already evaluated as a sensitive receptor in the Draft LA ART EIR (Section 3.13, Noise and Vibration) for purposes of identifying potential exterior construction noise impacts. The Draft SEIR focused only on existing noise-sensitive receptors identified in the LA ART EIR to determine potential interior noise levels from construction. If constructed, the Robert K. Ross Center would be considered new construction up to current building codes and standards. Interior noise levels from construction would be anticipated to be similar to other buildings of recent construction located along the Project alignment. As described in Section 3.0, *Construction Noise Mitigation, of the Draft SEIR, interior noise levels from construction are anticipated to range from 37 dBA (comparable to quiet urban nighttime noise levels) to 58 dBA (less than normal speech at three feet). Further, the Robert K. Ross Center was proposed prior to the Project's initial approval. The Final LA ART EIR addressed the Robert K. Ross Center in detail in Topical Response E, The Proposed Project Will Not Displace Housing or Prevent Planned Housing. Therefore, the Robert K. Ross Center is not significant new information warranting additional environmental review. In sum, recirculation of the Draft SEIR is not required to include additional analyses of these two buildings.*

Response GO4-5 *Refer to Responses GO17-129 and GO17-130 of the Final LA ART EIR for discussion regarding the Project's potential noise impacts to human health. As explained therein, people in the vicinity of the proposed Project site would not be exposed to construction noise levels that would exceed the Occupational Safety and Health Administration (OSHA), the California Occupational Safety and Health Administration (Cal/OSHA), and Environmental Protection Agency (EPA) guidelines. As described in Section 1.4, Purpose of This Draft Supplemental EIR, of the Draft SEIR, the SEIR was prepared to respond to the Court Opinion's direction regarding the adequacy of the construction noise mitigation analysis in the LA ART EIR. It provides additional consideration of the feasibility of retrofitting existing buildings to mitigate significant construction noise impacts and additional analysis of and revisions to Mitigation Measure NOI-A. In response to the Court Opinion, the SEIR analyzes potentially feasible noise mitigation measures to address the Project's significant temporary construction noise impacts. Refer to Sections 3.6 through 3.8 of the Draft SEIR and Topical Response 3, Construction Noise, of the Final SEIR.*

As discussed in Topical Response 3, Construction Noise, many suggested measures are not feasible. Nevertheless, the Project Sponsor has agreed to provide personal hearing protection as a voluntary Project commitment as described below and in Topical Response 3, Construction Noise, in response to comments received on the Draft SEIR.

Response GO4-6 *Refer to Topical Response 3, Construction Noise, for discussion of how the measure suggested in the comment has been incorporated as a voluntary Project commitment. It should be noted, however, that personal hearing protection is designed to prevent hearing damage in environments where noise levels are high enough to pose a risk of auditory injury. The interior construction-noise levels identified in the Draft SEIR do not approach thresholds associated with hearing impairment and therefore do not warrant protective devices of this kind. Residential noise standards exist to ensure that interior environments remain compatible with normal activities expected in homes, such as conversation, watching television, listening to music or podcasts, using telephones, studying, or resting. In many cases, using personal hearing protection inside a residence would interfere with these basic, everyday activities to a greater extent than the temporary construction noise itself, even if that noise may be noticeable at times.*

For these reasons, personal hearing protection is not an appropriate or effective measure for addressing elevated but non-hazardous indoor noise levels, and the Draft SEIR appropriately focuses on feasible measures that relate to actual construction-related effects.

Response GO4-7 *Refer to Topical Response 3, Construction Noise, for discussion of how relocation assistance is not feasible. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for a discussion of how the ability to use the vast majority of the park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the construction or operation of the proposed Project.*

Response GO4-8 *Refer to Topical Response 3, Construction Noise, for discussion of how Project construction would comply with Los Angeles Municipal Code (LAMC) requirements regarding construction activities. Further, Project construction would be coordinated with the community as necessary, pursuant to Mitigation Measure TRA-B and Project Design Feature NOI-PDF-B, as described in Topical Response 3, Construction Noise. Finally, Cathedral High School, which is located along the proposed Project alignment, strongly supports the Project and requests that Metro approve the Project (see Appendix B of this Final SEIR for Cathedral High School Comment Letter, submitted on November 13, 2025). As stated in the comment letter, the Project "will improve traffic around the School when there are games and events at Dodger Stadium" and "will take thousands of cars off the road, improving pedestrian safety and improving air quality. LA ART has been open with us and our students, providing updates through this entire process."*

Response GO4-9 *Noise contour modeling would not change the conclusions of the Draft SEIR regarding predicted construction noise levels at noise-sensitive receptors (i.e., provide louder results), including residences, schools, and parks, nor would it better inform the feasibility of acoustic retrofitting. Noise contour modeling requires fixed, known locations or areas for individual pieces of construction equipment, and it predicts how noise is propagated from those locations. Because construction equipment is mobile and its location, configuration, and use vary throughout the day and over the course of each construction phase, contour modeling could severely underestimate the scope of construction noise exposure.*

The Draft SEIR's modeling avoids this problem by predicting construction noise levels emanating from the closest potential equipment location to the nearest façade of each building. The predicted worst-case construction noise level at the nearest façade of each building was then applied to the greater building area (e.g., at units with greater horizontal distances from construction activities). If modeled in the manner being requested, standard modeling methodology would disperse construction equipment across the defined work area for each piece of *equipment, resulting in lower predicted construction noise levels at the nearest building façade.*

The Draft SEIR method provides a conservative basis for evaluating impacts. By contrast, noise contour modeling, if used, would identify impacts to only those units that fall within a particular sound-level contour boundary at a given moment, resulting in fewer predicted impacts and a less protective analysis. In other words, while noise contour modeling might provide more spatial detail, it would not provide more accurate or meaningful information.

With respect to public-use spaces, the Draft SEIR focuses on the feasibility of interior noise mitigation, consistent with the Court-ordered scope of supplemental review. Public-use spaces are outdoor environments and do not involve interior exposure or the potential for retrofitting to reduce interior construction noise levels. Moreover, because construction activities move among work zones and do not create a consistent or stationary noise field across large areas, contour mapping would not provide additional meaningful insight into temporary conditions in these outdoor public spaces during construction.

Relying on contour modeling in the context of construction noise would not produce more reliable or actionable information for assessing temporary construction noise and would not better inform the feasibility of construction noise mitigation measures.

Response GO4-10 *Refer to Responses GO17-129 and GO17-130 of the Final LA ART EIR for discussion regarding the Project's potential noise impacts to human health. As explained therein, people in the vicinity of the proposed Project site would not be exposed to construction noise levels that would exceed the OSHA, Cal/OSHA, and EPA guidelines. The LA ART EIR's analysis of potential health effects associated with construction noise was also the subject of extensive litigation. The Court of Appeal upheld Metro's analysis of health-related noise impacts. Accordingly, the supplemental review directed by the Court does not reopen that issue, and the conclusions in the LA ART EIR regarding potential health effects remain valid. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Moreover, interior construction noise levels will not be severe, as the comment suggests. As described in Section 3.0, Construction Noise Mitigation, of the Draft SEIR, interior noise levels from construction are anticipated to range from 37 dBA (comparable to quiet urban nighttime noise levels) to 58.1 dBA (less than normal speech at three feet). Finally, as part of a voluntary Project commitment, the Project Sponsor has agreed to make personal hearing protection available upon request.

Response GO4-11 *The commenter's suggestion that the Draft SEIR inflated façade noise reduction values to support infeasibility findings is incorrect. The Draft SEIR explains why the modeling provides more precise noise reduction levels than previously identified in the LA ART EIR. In response to comments on the Draft LA ART EIR, the Final LA*

ART EIR addressed interior noise attenuation using EPA's guidance, which assumes a 12 dBA reduction with windows open and a 24 dBA reduction with windows closed. (See Final LA ART EIR, p. 6.0-617.) As described in Appendix A to the Draft SEIR, the 24 dBA noise reduction is an estimate based on building construction in warm weather in the 1970s.

For the Draft SEIR, a more specific, receptor-based noise reduction analysis was performed using local building information and updated modeling techniques. The results show attenuation of 25.8 to 34.1 dBA with windows closed at most sensitive receptors, indicating that the assumptions used in the Final LA ART EIR were conservative rather than overstated. The updated analysis reflects improved data, not a change in methodology to reach a particular outcome. The detailed façade analysis was undertaken precisely to provide greater accuracy and disclosure in the supplemental analysis. The resulting building-specific modeling provides a more refined and empirically supported basis for evaluating interior noise levels.

Therefore, as described in Section 3.0, Construction Noise Mitigation, of the Draft SEIR, interior noise levels during construction are anticipated to range from 37 dBA (comparable to quiet urban nighttime noise levels) to 58 dBA (less than normal speech at three feet). Refer to AECOM's Supplemental Technical Report for more information.

Response GO4-12 *The Draft SEIR and Appendix A to the Draft SEIR go into great detail on various retrofitting techniques. Section 3.6.3.1 of the Draft SEIR describes acoustic retrofit considerations and techniques for high-performing buildings. Section 3.6.3.2 of the Draft SEIR describes acoustic retrofit considerations and techniques for older residential buildings. Section 3.6.3.3 of the Draft SEIR describes special considerations for Cathedral High School. The Draft SEIR then describes the noise, vibration, disruption, and other environmental considerations associated with the identified acoustic retrofit methods. (See Section 3.6.4 of the Draft SEIR.)*

The Draft SEIR mentions the term "cost" only once in the context of adding aesthetic and design considerations for building interiors and exteriors. Importantly, the Draft SEIR does not make any conclusions regarding financial feasibility. Rather, the Draft SEIR identifies a range of substantial feasibility constraints, including enforceability, logistics, property access and negotiation, design variability, permitting and construction challenges, aesthetics and design considerations, historic structure considerations, verification of effectiveness, and timing. These constraints, not costs, formed the basis of the Draft SEIR's feasibility determination.

As explained in Section 3.6.2 of the Draft SEIR, "[c]onsidering these practical and logistical constraints, a building retrofitting program would not be capable of being accomplished in a successful manner within a reasonable period of time. Property access constraints, design variability, permitting and construction *challenges, verification issues, and the extensive timeframe required for implementation, individually and collectively, demonstrate that such a program could not be implemented in a way that reliably reduces construction noise during the Project's construction period." Therefore, the Draft SEIR appropriately concludes that a retrofitting program would not be feasible. For additional information regarding the feasibility of a voluntary retrofitting program, refer to Topical Response 3, Construction Noise.*

Response GO4-13 *As an initial matter, there is no inconsistency between the Draft SEIR's use of "windows closed" as a modeling assumption and its conclusion that permanently installing fixed windows or doors would not be feasible. Temporarily closing windows during construction to minimize the intrusion of exterior noise is normal, voluntary occupant behavior. This is fundamentally different than retrofitting a building to remove operable windows or doors and replace them permanently with fixed systems. As described in the Draft SEIR, although fixed systems can improve acoustic performance, they eliminate natural ventilation, and, in some cases, access to balconies or egress routes. For buildings not designed to provide adequate mechanical ventilation or cooling with windows closed, this could lead to decreased indoor air quality, loss of passive cooling during mild weather, and increased energy demand on the building's HVAC systems. Eliminating operable doors could also raise concerns regarding fire safety and evacuation. Further, the result would be a permanent inability to open windows and doors even though construction noise would only be temporary. Refer to Section 3.6.3.1 of the Draft SEIR for additional information.*

Similarly, the Draft SEIR's modeling assumption is not a mitigation measure and does not require residents to keep their windows closed. It was reasonable and common for AECOM to model interior construction noise with windows closed because this is the configuration people indoors typically use to reduce outdoor noise in an urban environment. It is also reasonable for Metro to have assumed that interested parties would want to know the interior noise levels with windows closed during construction. If windows were open, the interior noise levels would be higher. CEQA does not require Metro to assume that residents would keep their windows open during construction.

Further, as described in AECOM's Supplemental Technical Report, interior noise levels from construction were modeled to assess the efficacy of performing acoustic retrofitting as a mitigation measure for temporary construction noise. Predicted exterior construction noise results were already provided in the LA ART EIR (and restated in the Draft SEIR). These exterior construction noise values would be equivalent to the noise level experienced while standing directly in front of an open window. Therefore, this information is already provided in the Draft SEIR, and no additional analysis is necessary.

Response GO4-14 *Refer to Topical Response 3, Construction Noise. In addition, as the comment notes, the CEQA Guidelines place the burden of enforceability on the agency. The*

Draft SEIR explains that Metro has no legal means of ensuring such a program is implemented successfully, if at all. It is also unknown and speculative what measures individual residents may undertake, so the overall effectiveness of such a measure would remain uncertain. Even if Metro could describe and analyze specific retrofit techniques, the measure's implementation would hinge on the independent willingness of numerous private third parties, leaving Metro with no assurance that any meaningful reduction in interior noise levels would actually be achieved.

The comment asserts that many mitigation measures are partially voluntary. However, the comment does not provide any examples of CEQA mitigation requiring voluntary participation. Many programs, such as voluntary exchanges of leaf blowers or other equipment, are not CEQA mitigation measures, but rather discretionary public-agency programs undertaken for policy, incentive, or community-outreach purposes. CEQA mitigation must reduce or avoid a project's physical environmental impacts and must be enforceable within the lead agency's control. This ensures that the measures are not merely aspirational but are capable of being implemented and monitored effectively. By contrast, buy-back or exchange programs simply offer members of the public an optional benefit. It is well established that such voluntary programs do not qualify as mitigation under CEQA. As a result, they are not an appropriate analogue for a retrofit program, which would require Metro to ensure access to, modification of, and ongoing performance of improvements inside numerous private residences.

It is also important to distinguish between standards that protect against hearing loss and the interior noise standards used in land-use compatibility analyses. Occupational hearing loss standards, such as the OSHA permissible exposure limit of 90 dBA over an 8-hour period, are designed to prevent auditory damage from sustained, long-term exposure. Federal public-health guidance, such as the EPA's 70 dBA LEQ(24) recommended limit, is based on 40 years of exposure and is similarly focused on preventing cumulative hearing impairment. In contrast, land-use compatibility thresholds for residences (typically in the 45–50 dBA interior range) are designed to maintain the quality of indoor environments, facilitate speech intelligibility, and minimize interference with normal indoor activities—not to protect against hearing loss. As shown in the Draft SEIR, interior construction noise levels are anticipated to range from approximately 37 to 58 dBA, which are well below levels associated with auditory injury and fall within or near normal conversational levels. These temporary interior noise levels would not cause hearing damage, would not occur overnight, and would generally allow for typical indoor residential activities. For additional information regarding the effects of noise exposure on health, refer to Final LA ART EIR, Response GO17-129.

The example of airport sound-insulation programs, such as those implemented near Los Angeles World Airports (LAWA), involves decades-long exposure to high outdoor airplane noise exceeding established land-use compatibility thresholds on a permanent basis, which triggers federally-funded sound insulation programs. In *contrast, the proposed Project's temporary construction noise levels do not approach such long-term exposure levels, do not render residential uses incompatible, and do not implicate federal noise-compatibility mandates. As a result, LAWA's residential sound insulation program arises from a completely different legal, regulatory, and acoustic context and does not provide a model for CEQA mitigation for temporary construction-period noise. As discussed in Topical Response 3, Construction Noise, LAWA's example illustrates why implementing a voluntary retrofit program for the proposed Project's temporary construction noise impacts would not constitute feasible mitigation because it could not be successfully implemented within a reasonable time period.*

Response GO4-15 *This comment mischaracterizes the Draft SEIR, which does not state that insulation techniques would violate CEQA. Rather, the Draft SEIR identifies the potential that a retrofit program would not necessarily return affected receptors to pre-Project conditions as one of many considerations in evaluating the overall feasibility of a retrofit program. CEQA requires that a mitigation measure be reasonably expected to achieve its purpose and be capable of implementation in a real-world setting. The Draft SEIR evaluated whether a multi-building retrofit program could meaningfully reduce interior construction noise under actual field conditions, including variations in building age and construction, differing window and door assemblies, property access issues, and uncertainty regarding how individual owners and occupants may use or maintain their units. The analysis concluded that, even if individual retrofit techniques can be described in the abstract, their performance depends on numerous factors outside Metro's control. Therefore, the measure's real-world effectiveness would remain uncertain, and it cannot be shown to achieve its intended outcome with a reliable degree of predictability. It also replaces one set of temporary inconveniences with others that do not address the underlying impact. The Draft SEIR therefore properly treated the inability to achieve reasonably comparable interior conditions as evidence of limited effectiveness, not as a legal threshold, and considered that factor along with other logistical and implementation constraints in concluding that the success of such a retrofitting program would be uncertain and not feasible or enforceable within the meaning of CEQA.*

Response GO4-16 *Refer to Response GO4-10 of this Final SEIR and Responses GO17-129 and GO17-130 of the Final LA ART EIR for discussion regarding the Project's potential noise impacts to human health. As explained therein, people in the vicinity of the proposed Project site would not be exposed to construction noise levels that would exceed the OSHA, Cal/OSHA, and EPA guidelines for the protection of human health. The adequacy of the LA ART EIR's analysis of construction noise health impacts was upheld by the Court of Appeal.*

The construction noise levels reported in the Draft SEIR are based on each receptor's worst-case predicted construction noise level (after mitigation), as modeled and presented in the Final LA ART EIR Errata (Table 1). Noise levels are measured in decibels (dBA), which is a logarithmic scale. This means that *construction noise does not simply "add" to existing ambient noise in a linear manner. A louder source dominates the combined level, while a quieter source contributes very little. For example, if ambient interior noise is 50 dBA and construction generates 56 dBA within the same room, the combined interior noise level would be 57 dBA, not 106 dBA. This is because 56 dBA dominates and the logarithmic sum produces only a 1 dB increase. For this reason, the LA ART EIR appropriately evaluated construction noise by comparing the predicted construction noise level directly to the applicable significance threshold, rather than summing ambient and construction noise.*

As described in Section 3.0 of the Draft SEIR, anticipated interior noise levels from construction range from approximately 37 dBA to 58 dBA given the noise attenuation created by building exteriors. These levels fall within or only somewhat above the spectrum of typical indoor ambient noise (many residential interiors during ordinary use are in the 30–50 dBA range) and are well below sound-exposure levels associated with hearing damage. No further analysis is required.

Response GO4-17 *CEQA defines "feasible" as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. (CEQA Guidelines, § 15364.) The need to identify, access, and handle hazardous building materials safely and in compliance with regulatory requirements is an appropriate consideration when assessing the feasibility of a multi-building retrofit program.*

As the Draft SEIR explains, acoustic retrofit techniques that would disturb existing building components may encounter lead-based paint, asbestos-containing materials, or other hazardous substances that must be handled by a licensed professional under contained conditions, and sometimes with temporarily vacated units. While these activities would impose additional costs, costs are not the only consideration. Proper handling and removal also implicate time, scheduling, permitting, worker and resident safety, and resident-relocation considerations. These considerations bear directly on whether a retrofit program could be accomplished successfully in a reasonable period of time. Further, these actions would have to be repeated at different private residences with different construction types, ages, and hazardous material conditions, further affecting the feasibility of implementing such a program in a successful and timely manner.

Response GO4-18 *Regarding the assertion that portions of the Draft SEIR are too technical for lay readers to understand, refer to Topical Response 5, CEQA Process for the Draft SEIR. The Draft SEIR was prepared to be understandable to the general public while still providing the level of technical detail necessary to accurately explain how construction-noise levels were modeled and how conclusions were reached. Section 3.5.2 of the Draft SEIR summarizes the results of the interior construction noise analysis in straightforward terms and includes an easy-to-follow table presenting the predicted interior noise levels. Section 3.2.1 of the Draft SEIR is* *included specifically to assist non-technical readers in understanding the basics of noise analysis so that readers have the context needed to follow the analysis in the later sections. Although this section necessarily uses some standard acoustical terminology, its purpose is to clarify a highly technical topic. Taken together, the summary of information and explanatory background in the Draft SEIR provide a clear and complete discussion that allows readers to understand the analysis and its conclusions.*

Regarding the use of photographs, as described in the Draft SEIR and Appendix A thereto, AECOM assessors conducted field visits along the Project alignment to visually assess structures potentially affected by construction noise. For each building, the survey team photographed exterior facades, documented window and door types, and identified observable construction components. The photographs serve as a crucial input reference to the development of AECOM's acoustic prediction models, and their inclusion in Appendix A of the Draft SEIR is intended to help the reader understand generally the façade makeup of each building. Assessors also reviewed publicly available data to determine years of construction, past renovations, and the overall condition of the façade components. This combination of site-specific observation, photographic documentation, and factual research constitutes substantial evidence. (CEQA Guidelines, § 15384 ["Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts"].) Photographs do not substitute for analysis. Rather, they record the factual conditions upon which the retrofit evaluation is based. Photographs are a standard and appropriate component of environmental field studies, especially where, as here, site access is limited and conditions must be evaluated from the public right-of-way.

With respect to older structures, as described in Appendix A to the Draft SEIR, AECOM and Resonance Acoustics evaluated an accessible representative unit at 430 Savoy, one of the homes represented by Noise-Sensitive Receptor 17S. Predictive modeling for homes of this age and construction is unreliable and may overpredict the performance of the building facade (i.e., show it blocks more noise than it actually does). Therefore, where access was available, AECOM performed direct façade noise-reduction testing to obtain empirical data that would conservatively represent how similar homes along Savoy Street may function. Based on this testing, combined with AECOM's professional experience and expertise evaluating structures of similar age and construction type, Appendix A identifies generalized retrofitting and renovation considerations applicable to older buildings (see Appendix A, Section 1.4.2). CEQA does not require invasive testing of every individual building or destructive sampling of every façade. Agencies may rely on representative samples, expert judgment, and reasonable inferences based on observed conditions. The Draft SEIR's use of representative testing, supported by field surveys and professional expertise, constitutes substantial evidence supporting the Draft SEIR's analysis and conclusions. Refer to AECOM's Supplemental Technical Report for more information.

Response GO4-19 *This comment mischaracterizes the Court Opinion. As the Court Opinion explains, "[t]he problem with mitigation measure NOI-A is not necessarily that it lacks performance standards for most of its elements. Rather, . . . the problem is that the EIR fails to explain why Metro could not be certain about each measure's effectiveness." (Court Opinion, p. 77.) In direct response, Section 3.8 of the Draft SEIR and Appendix A to the Draft SEIR evaluate the effectiveness of each component of the original Mitigation Measure NOI-A and provide the explanation the Court found missing.*

Each component of the original Mitigation Measure NOI-A addressed temporary construction noise, but served different functions. The Draft SEIR retains in revised Mitigation Measure NOI-A those components demonstrated to provide at least partial noise reduction beyond the modeled levels. Other components, such as those that were already incorporated into the modeling assumptions for the LA ART EIR, have been reclassified as Project Design Features (NOI-PDF-B).

By reclassifying certain components as Project Design Features, the components have not been "demoted" or determined to be "ineffective." As explained in Section 3.8 and Appendix A to the Draft SEIR, they would be effective at reducing construction noise, but to an uncertain extent. They are also necessary to preserve modeling validity and ensure actual construction noise remains consistent with the LA ART EIR's analysis. The Draft SEIR's revisions thus improve the clarity and enforceability of the construction noise commitments by distinguishing between (1) mitigation that produces noise reductions, and (2) operational practices that manage construction activities and maintain consistency with modeled assumptions.

The Draft SEIR identifies all feasible mitigation measures to reduce the Project's significant construction noise impacts. The fact that certain components of original Mitigation Measure NOI-A are now Project Design Features does not mean they are any less enforceable as part of the Construction Noise Management Program and MMRP. There is no evidence that reclassifying these components as Project Design Features would result in reduced efforts to minimize the Project's temporary construction noise impacts or mislead the public regarding the functions of these components.

Response GO4-20 *The contents of Enclosure 1 have been reviewed and are considered in this response. As noted in the Final LA ART EIR, Topical Response D, Metro Is the Proper Lead Agency for the Proposed Project as the Region's Transportation Authority; Metro Named and Consulted with the Applicable Responsible Agencies, the City is a responsible agency for the proposed Project under CEQA. As such, it will consider whether to approve the components of the Project within its jurisdiction as part of its separate, discretionary administrative review process.*

Metro has consulted with the City throughout the preparation of the LA ART EIR and the Draft SEIR. The City did not submit comments on the Draft SEIR during the *public review period. The City's November 11, 2025, resolution expresses the policy position of its legislative body, but does not alter Metro's duties as Lead Agency to evaluate the proposed Project, respond to comments, and determine whether the SEIR complies with CEQA. If Metro certifies the Final SEIR and reconsiders the Project, the City will then exercise its independent authority as a Responsible Agency in deciding whether to issue approvals within its purview.*

Response GO4-21 *Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion of the City of Los Angeles' proposed transportation study. As described therein, the City of Los Angeles' study is focused on Dodger Stadium events and transportation options within the City for reducing transportation-related impacts to surrounding communities; it is not specific to the proposed Project. The study is not an environmental analysis of the proposed Project, and its initiation dos not affect the validity of the Draft SEIR. CEQA does not require a lead agency to delay its environmental review or approval process pending the outcome of another agency's separate planning effort. Metro will continue to coordinate with the City on the proposed Project advances.*

Response GO4-22 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Response P2-1 for discussion regarding the Dodger Stadium Express, including potential service expansion and enhancements. Please note that the Court of Appeal upheld Metro's original alternative analysis and did not direct Metro to revisit or expand that analysis on remand.*

It should also be noted that the proposed Project and a possible expansion of Dodger Stadium Express are not mutually exclusive. Both could operate concurrently and both could improve access to Dodger Stadium and the surrounding area. The proposed Project would not preclude enhancements to Dodger Stadium Express or any other public transit service. Rather, the Project could complement those services and expand overall mobility options for the community. Metro's motion does not modify the Project, does not create a new project alternative, and does not constitute new information requiring changes to the LA ART EIR's analysis. Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for additional discussion regarding transportation alternatives.

Response GO4-23 *Refer to Response GO4-1, above, and to Topical Response 2, Request for Consultation with the Santa Monica Mountains Conservancy. The Court of Appeal directed Metro to request consultation with SMMC "specifying a reasonable time within which the trustee agency must respond," and to complete that consultation as part of the corrective actions incorporated into the SEIR.*

The Court's disposition does not require Metro to set aside its prior approvals before initiating consultation, nor does CEQA prohibit a lead agency from conducting supplemental environmental review or agency consultation while writ *proceedings are underway. What CEQA requires is that Metro complete the corrective actions and consider the consultation before reconsidering the proposed Project for approval. Draft SEIR Section 1.5, Public Review Process for the Draft Supplemental EIR, makes clear that any future Project decision will only occur after Metro has complied with the Court's direction, completed the supplemental analysis, and recertified the Final EIR as supplemented by the Final SEIR.*

Comment GO5 **Stop the Gondola Coalition**

Response GO5-1 *This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response GO5-2 through GO5-15.*[1]

Response GO5-2 *1. Refer to Topical Response 3, Construction Noise, for discussion of the construction noise methodology for the Draft SEIR, voluntary retrofit measures, and potential disruption from retrofitting. The analysis did not make any assumptions regarding residents' preferences. The analysis provides detailed information on the process for retrofitting the various types of buildings.*

2. Refer to Topical Response 3, Construction Noise, and Response GO4-13 in this Final SEIR for discussion about the construction noise methodology and analysis. The Draft SEIR does not assume that residents will keep their windows closed or operate air-conditioning during construction. Predicted exterior construction noise results were already provided in the LA ART EIR (and restated in the Draft SEIR). These exterior construction noise values would be equivalent to the noise level experienced while standing directly in front of an open window. Interior noise levels from construction were modeled in response to the Court Opinion to assess the efficacy of performing acoustic retrofitting as a mitigation measure for temporary construction noise. Refer to AECOM's Supplemental Technical Report for more information.

3. Refer to Topical Response 3, Construction Noise, and Response GO4-13 in this Final SEIR. Neither the LA ART EIR nor the Draft SEIR assumes that residents will stay inside. Section 3.13 of the Draft LA ART EIR analyzed exterior construction noise levels at noise-sensitive receptors, which would be similar to what building occupants would experience in outdoor spaces during Project construction. The Draft SEIR then analyzed how those exterior noise levels would transmit into interior spaces of buildings to understand the degree to which the existing building facades would reduce interior noise levels from Project construction. Regardless of whether individuals experience interior or exterior construction noise from the Project, the Draft SEIR identifies Mitigation Measure NOI-A and Project Design Feature NOI-PDF-B to reduce construction noise levels to the extent

[1] Note: The email transmitting this comment letter was generally a duplicate of the attachment, which was assigned comment numbers and responded to in Responses GO5-1 through GO5-15.

feasible, ensure compliance with regulatory requirements, and maintain construction noise levels consistent with those analyzed in the LA ART EIR.

4. Refer to Topical Response 3, Construction Noise, and Response GO4-13 of this Final SEIR, and other responses in this Response GO5-2 for discussion about the construction noise methodology and analysis. As noted above, the Draft SEIR does not assume that residents will keep their windows closed or operate air-conditioning during construction. Predicted exterior construction noise results were already provided in the LA ART EIR (and restated in the Draft SEIR). These exterior construction noise values would be equivalent to the noise level experienced while standing directly in front of an open window. Interior noise levels from construction were modeled in response to the Court Opinion to assess the efficacy of performing acoustic retrofitting as a mitigation measure for temporary construction noise. Refer to AECOM's Supplemental Technical Report for more information.

5. Refer to Topical Response 3, Construction Noise, and Response GO4-10 of this Final SEIR. Predicted interior noise levels from construction are anticipated to be far below the thresholds for impacts to hearing or health impacts.

6. Refer to Topical Response 3, Construction Noise, and AECOM's Supplemental Technical Report. The homes on the north side of Savoy Street were constructed in the late 1800s. These homes appear to include basement spaces with open-air ventilation grilles, some of which face south to Savoy Street and therefore would face construction activities. As discussed in the Draft SEIR, construction noise can enter into older buildings through several paths (e.g., roof areas, wall areas, windows, doors). These basement ventilation grilles would provide a point of entry, but noise reaching first-story living spaces would be reduced because it must travel through the flooring assembly or via a circuitous route (presumably, up a stairway and through a basement door). Therefore, interior construction noise levels at homes built in the late 1800s or with basements are still expected to reach approximately 55 dBA, which is similar to that commonly experienced in a large business office (Caltrans 2013). Based on the empirical testing at 430 Savoy and AECOM's professional expertise evaluating structures of similar age and construction, interior construction noise levels in these older homes are expected to be similar to those analyzed for Noise Sensitive Receptor 17S and within the range presented in Section 3.0 of the Draft SEIR. No additional testing or modeling is necessary. For additional information, refer to Response GO4-18 of this Final SEIR.

7. Refer to Response GO3-2 and Topical Response 3, Construction Noise, of this Final SEIR for discussion regarding the Project's anticipated exterior construction noise levels, as well as a discussion as to how exterior construction noise levels are similar to those anticipated for other construction projects throughout the City of Los Angeles. Although interior-noise mitigation is not applicable to open-air businesses, construction mitigation at the source would still apply to all locations *near construction, including Olvera Street. Mitigation Measure NOI-A and Project Design Feature NOI-PDF-B require implementation of soundwalls, scheduling and equipment controls, and community outreach to address construction noise at surrounding sensitive and commercial receptors.*

8. Refer to Topical Response 3, Construction Noise, for discussion of restrictions on construction hours. Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion regarding LA28.

Response GO5-3

9. Refer to Topical Response 5, CEQA Process for Draft SEIR. The complete Draft SEIR and its appendices were available for the full duration of the statutorily-prescribed 45-day public comment period, and Metro accepted comments from all interested parties. CEQA does not require Metro to extend the review period beyond the statutory minimum, and Metro's 45-day period provided the public with adequate time to review the document.

10. Refer to Topical Response 5, CEQA Process for the Draft SEIR. Metro provided public notice and opportunities for comment on the Draft SEIR consistent with CEQA's requirements. In-person hearings are not required under CEQA. For this supplemental review, Metro held a publicly accessible virtual hearing, offered simultaneous interpretation, and accepted written comments by mail, email, and voicemail throughout the 45-day comment period. These procedures ensured that all interested parties, including those who did not or could not attend the virtual meeting, had a full opportunity to participate in the CEQA process for the Draft SEIR.

11. Refer to Topical Response 5, CEQA Process for the Draft SEIR, and Response GO5-3 (10), above. CEQA does not require in-person hearings.

12. Refer to Topical Response 5, CEQA Process for Draft SEIR. Metro has provided a variety of engagement formats including a virtual public hearing with live interpretation, written comment options by email and mail, as well as comments by phone. Metro accepted comments from all residents regardless of whether they participated in the virtual meeting. Written comments could be submitted without accessing Zoom, and all comments received are included in this Final SEIR. Metro's notices were available in multiple languages to support community participation.

13. Refer to Topical Response 5, CEQA Process for the Draft SEIR. Because the Project is an SB 44 environmental leadership transit project, Metro was required to provide an informational meeting and a public hearing during the supplemental CEQA process. Metro complied with these requirements by holding both an informational workshop and a public hearing on the Draft SEIR, in addition to accepting written and voicemail comments throughout the 45-day review period. CEQA, including Public Resources Code section 21168.6.9 (SB 44), did not require a question-and-answer format at informational meetings.

14. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 5, CEQA Process for the Draft SEIR. The Draft SEIR was circulated for public review consistent with the Court of Appeal's decision and with CEQA's requirements for a limited supplemental EIR. The Draft SEIR's statement that commenters should focus on the supplemental analysis reflects established CEQA practice and was intended to assist readers by identifying the portions of the environmental analysis that had been revised and recirculated. The Draft SEIR did not state that commenters must limit their input, and nothing in the document prevented commenters from raising any topic of their choosing. In practice, commenters submitted a wide range of comments, including many on subjects unrelated to construction noise or trustee-agency consultation. Metro accepted all such comments, included them in the Final SEIR, and provided them to the decisionmakers.

15. Refer to Topical Response 5, CEQA Process for the Draft SEIR, and Response GO4-1 of this Final SEIR. The Court of Appeal directed Metro to decertify the EIR, and Metro will do so in accordance with the Superior Court's writ of mandate issued on November 5, 2025. CEQA does not require a lead agency to formally decertify an EIR before preparing or circulating a supplemental EIR. Agencies are permitted to begin corrective work while the writ is being finalized. The required decertification will occur before the Metro Board takes any new action to rely on the SEIR. Circulating the Draft SEIR for public review therefore did not conflict with the Court's decision or limit the public's ability to participate in the CEQA process. Metro will complete all actions required by the writ, including formal decertification, as part of its compliance with the Court-ordered supplemental review process.

16. Metro has been transparent that LA Aerial Rapid Transit Technologies LLC is the Project Sponsor and Metro is the lead agency for the proposed Project. Refer to page 1-1 of the Draft LA ART EIR, page 1.0-1 of the Final LA ART EIR, page 3 of the Draft SEIR, page 3 of the Final SEIR, and Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, of the Final LA ART EIR for discussion of the Project Sponsor.

Response GO5-4

17. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion of public statements regarding potential development and why the proposed Project was not improperly segmented or "piecemealed" from a larger development project. The Court of Appeal upheld Metro's analysis of potential induced growth and rejected petitioners' segmentation claims. No new information has arisen that requires revisiting that analysis in this limited SEIR.

18. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the Los Angeles State Historic Park General Plan Amendment and the proposed Project's potential impacts to Key Observation Points from within *the park. Refer to Topical Response F, Los Angeles State Historic Park, of the Final LA ART EIR for discussion of the proposed Project's mitigation measures. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. Refer to Final LA ART EIR, Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of why the proposed Project's mitigation measures are not deferred.*

19. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of privacy concerns related to the proposed Project. Cabin windows can be equipped with privacy glass that can become opaque when adjacent to sensitive areas, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted.

20. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information for discussion of LA28.

21. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the No Project Alternative. The No Project Alternative would not meet any of the Project objectives and would not provide the proposed Project's environmental benefits.

22. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion of Project Alternatives considered. Refer also to Response GO5-1, point 8, above.

Response GO5-5

23. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's costs and financial analysis. Costs and funding of the proposed Project are not environmental issues under CEQA issue and do not require a response.

24. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's Project Labor Agreement.

Response GO5-6

25. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project will have less-than-significant impacts on historic resources.

Response GO5-7

26. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's costs and financial analysis. Costs and funding of the proposed Project are not a CEQA issue and do not require a response.

27. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's costs and financial analysis. Costs and funding of the proposed Project are not a CEQA issue and do not require a response.

28. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion gondola design and operations.

29. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of aerial rights acquisition and how the proposed Project maximizes its alignment along the public ROW and publicly owned property and minimizes aerial rights requirements over private properties, taking into account existing and future adjacent land uses.

30. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of daily and special event operations. The proposed Project would operate daily between 6:00am and 12:00am to serve existing residents, workers, park users, and visitors to Los Angeles.

31. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of tree removal and replacement.

32. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the UCLA Mobility Lab Study.

Response GO5-8

33. Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion regarding the Los Angeles City Council motion to perform a transportation study related to Dodger Stadium. As noted in Topical Response 4, robust transportation analyses were performed for the LA ART EIR in accordance with the Los Angeles Department of Transportation's (LADOT's) Transportation Assessment Guidelines, approved by LADOT and peer reviewed by Stantec on behalf of Metro. That the City, as a CEQA Responsible Agency, may conduct additional analysis before it considers the Project does not affect Metro's ability as Lead Agency to proceed in its separate review and consideration of the proposed Project.

Response GO5-9

34. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project will have less-than-significant impacts on historic resources.

35. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project will have less-than-significant impacts on historic resources.

36. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's construction vibration impacts. With implementation of Mitigation Measures VIB-A and VIB-B during construction of

Alameda Station, vibration damage impacts at the Avila Adobe, the Old Winery, and El Grito Mural, would be less than significant.

37. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of Project features and how the proposed Project addresses environmental justice. As discussed in the Draft LA ART EIR, Section 2.0, Project Description, the Alameda Station location was selected because of its safe and convenient pedestrian connection to and from the LAUS passenger terminal and El Pueblo, inclusive of Olvera Street. The proposed Project would also include a new pedestrian plaza at El Pueblo. Accordingly, the proposed Project would bolster pedestrian and transit connections to El Pueblo and Olvera Street. Refer to Topical Response C, Project Features, of the Final LA ART EIR, for discussion of the proposed Project's features to enhance and provide additional benefit to the surrounding community, including marketing plans to help promote the adjacent business areas and partnerships with local businesses and nonprofits along the proposed Project alignment.

38: Refer to Final LA ART EIR, Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and represents an opportunity for additional visitors along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to businesses along the alignment, which, consequently, adds revenues to these small businesses in the communities the proposed Project hopes to serve. Refer to Final LA ART EIR, Topical Response C, Project Features, for discussion of how during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents.

39. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of Project features and how the proposed Project addresses environmental justice. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street.

40. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project addresses environmental justice.

Response GO5-10

41. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion regarding privacy.

42. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project addresses environmental justice. The *proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street.*

43. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of parking. The proposed Project would include a parking management plan identifying specific partnerships with parking owners/operators and businesses. Robust feedback from community stakeholders would inform development of the parking management plan.

44. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project addresses environmental justice, including how the proposed Project would not preclude development of uses including housing, grocery stores, and/or healthcare facilities in the surrounding communities. Refer to Final LA ART EIR, Topical Response C, Project Features, for discussion of the proposed Project's features to enhance and provide additional benefits to the surrounding communities including but not limited to sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs, signage, utilization of local artists for site-specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment.

45. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of gondola operations. The issues raised in this comment are outside the limited supplemental review ordered by the Court. The Draft SEIR does not propose, modify, or approve changes to existing Metro bus service, and CEQA does not require an EIR to evaluate or justify past or future service planning decisions unrelated to the proposed Project. The analysis of construction noise mitigation in Section 3.0 of the Draft SEIR is based on the proposed Project's anticipated construction requirements and does not depend on or alter local bus route frequencies.

Response GO5-11

46. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of tree removal and replacement in LASHP and of the proposed Project's less-than-significant impacts to biological resources.

47. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project will not interfere with Los Angeles State Historic Park uses. The Chinatown/State Park Station would have a footprint of 2,195 square feet in LASHP (~0.1% of the total 32-acre park), and the station canopy would have an overhang of 9,320 square feet over the park. The proposed Project's required aerial clearance would be located above approximately 59,470 square feet of the total 32-acre park, plus an Additional Separation Buffer.

48. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project will not interfere with park uses. With the required clearances and the height at which the cabins would cross over LASHP, the ability to use the vast majority of the park for kite flying, special events (e.g., concerts, craft fairs, partnership events, 5K/10K runs, workshops, cultural festivals, and the farmers' market), and other passive recreational opportunities (e.g., picnicking, jogging, walking, and informal play) would not be affected by the proposed Project.

49. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's less-than-significant impacts to biological resources. Refer to the Draft LA ART EIR, Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, and Final LA ART EIR, Appendix G, Supplemental Biological Resources Report, for discussion of how impacts to biological resources from construction and operations of the proposed Project, including to birds, bats, and monarch butterflies or their habitat, would be less than significant.

50. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project will not interfere with LASHP. Refer to the Final LA ART EIR, Response S2-1, for an acknowledgment from Metro and the Project Sponsor of the more than 20 years of effort the community undertook to convert the closed rail yard at River Station to what is now LASHP. Through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to LASHP, including pedestrian improvements between Metro's A Line and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and park amenities.

51. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project will not interfere with park uses. See also the response provided to part 48 of this Comment.

52. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how operational noise impacts to LASHP will be less than significant.

53. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's pedestrian access improvements.

Response GO5-12

54. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the gondola design and operations, as well as discussion of how the proposed Project's impacts related to historical resources would be less than significant. The proposed Project alignment was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses.

55. This comment is incorrect. As discussed in Draft LA ART EIR, Appendix Q, Proposed Alignment Plan and Profile, and Final LA ART EIR, Appendix P, Design Option A Plan and Profile, the proposed Project with Design Option A requires certain aerial rights over private property located at 455 Savoy Street. The proposed Project's approximate cable height over the 455 Savoy Street property is approximately 68 feet and the bottom of the cabin height over 455 Savoy Street is approximately 47 feet.

56. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the Project alignment. Refer to Draft LA ART EIR, Section 3.17, Transportation, and Final LA ART EIR Response S3-2A for discussion of SR-110. Refer to Draft LA ART EIR, Section 2.0, Project Description, and Final LA ART EIR, Topical Response J, Gondola Design and Operations, for discussion of the proposed Project's design and operations, including discussion of the safety, privacy, and operations features of the proposed Project. Refer to Draft LA ART EIR, Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, for discussion of the aesthetic impacts of the proposed Project, including to motorists, which would be less than significant. Viewer exposure for motorists is low due to the short duration of views and high travel speeds of vehicles.

Response GO5-13

57. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's less-than-significant impacts to biological resources, including wildlife, birds, bats, and monarch butterflies.

58. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of Chavez Ravine.

Response GO5-14

59. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the Project Sponsor.

60. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of why the proposed Project was not improperly segmented or "piecemealed" from a larger development project.

61. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.

Response GO5-15

62. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion regarding the proposed Project's timed ticket system and gondola operations.

63. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, and Response P2-1 of this Final SEIR for discussion regarding Dodger Stadium Express. Refer to Final LA ART EIR, Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most *of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and LASHP. Electrification of the Dodger Stadium Express buses would not negate the operational issues associated with substantially expanding the Dodger Stadium Express. Finally, funding for the Dodger Stadium Express is not a CEQA issue or relevant to Metro's consideration of the proposed Project.*

64. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information and Response P2-1 of the Final SEIR for discussion regarding the Dodger Stadium Express. Refer to Final LA ART EIR, Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, for discussion of how an enhanced Dodger Stadium Express is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and LASHP.

Comment GO6 **California State Park Rangers Association**

Response GO6-1 *This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response GO6-2 through GO6-5.*

Response GO6-2 *Refer to Topical Response 2, Request for Consultation with the Santa Monica Mountains Conservancy, for discussion of Metro's consultation request to SMMC and the statutory framework governing trustee-agency consultation. As explained therein, Metro requested consultation consistent with the Court Opinion and Public Resources Code sections 21080.4 and 21104, and SMMC did not request consultation during the 30-day period provided. Separately, on November 18, 2025, SMMC submitted a comment on the proposed Project's Draft SEIR. In accordance with CEQA, Metro prepared response to SMMC's comments, which are included in Responses PA1-1 through PA1-3 in this Final SEIR.*

Response GO6-3 *Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion regarding the City of Los Angeles Transportation Study.*

Response GO6-4 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion regarding the proposed Project's costs and financial analysis. Costs and funding of the proposed Project are not a CEQA issue and do not require a response.*

Response GO6-5 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion regarding LASHP, including the ability of uses to continue at the park and that operational impacts to the park would be less than significant.*

Comment GO7 **Metro Senior Lofts**

Response GO7-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. The Court of Appeal's decision did not find the LA ART EIR to be broadly flawed. As explained in Topical Response 1, the Court upheld Metro's analysis on the vast majority of issues raised in the litigation. As required by the Court of Appeal, the Draft SEIR evaluates construction noise mitigation (see Topical Response 3, Construction Noise). Metro also timely requested consultation with SMMC as a trustee agency. Refer to Topical Response 2, Request for Consultation with the Santa Monica Mountains Conservancy.*

Response GO7-2 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion regarding privacy. Cabin windows can be equipped with privacy glass that can become opaque when adjacent to sensitive areas, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted.*

Response GO7-3 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. Refer also to Draft LA ART EIR, Section 3.17, Transportation, and Appendix B, Construction Assumptions, for a full description and annotated diagrams of the complete and partial roadway closures that would be required during construction of the proposed Project. As described in the Draft LA ART EIR, the closures would be temporary and would only occur during the construction phase. Although these temporary closures during construction would disrupt vehicle, pedestrian, and bicycle access, there would be a variety of options available for connections and access within the Project area. In addition, the provision of pedestrian detours during certain phases of construction would allow for continued pedestrian access within the Project area. Communities would remain accessible from other surrounding streets, and pedestrian detours would be provided.*

Emergency access would be preserved. As described in the Draft LA ART EIR, the proposed Project would implement a Construction Traffic Management Plan (CTMP) per Mitigation Measure TRA-B. The CTMP must be approved by the City of Los Angeles and include detours and ensure that public and emergency access is maintained throughout all construction activities. Although construction activities would temporarily narrow walkways, requiring scaffolding, or alter traffic patterns, these conditions would be managed through the City-reviewed CTMP.

The proposed Project did not "hide" potential traffic disruptions. As noted above, these temporary effects are described in Draft LA ART EIR, Section 3.17 and Appendix B. Implementation of Mitigation Measure TRA-B would ensure construction is managed and coordinated with the City to reduce disruption.

Response GO7-4 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. The court's limited jurisdiction on remand does not permit new challenges to issues that could have been raised previously or that were resolved in the prior litigation. (Ballona Wetlands Land Trust v. City of Los Angeles (2011) 201 Cal.App.4th 455, 480.) With respect to dust and indoor air quality, there is no evidence that dust from proposed Project construction would infiltrate air conditioning units or adversely affect air quality indoors. The Draft LA ART EIR, Section 3.3, Air Quality, evaluated fugitive dust emissions and concluded that compliance with applicable construction dust-control requirements, such as those in the South Coast Air Quality Management District Rule 403, would ensure impacts remain less than significant. The comment also notes that some seniors rest or nap during the day. The LA ART EIR evaluated construction noise using the City's previously adopted daytime construction-noise standards, as well as the Federal Transit Administration's daytime construction-noise criteria. These standards are based on accepted community noise metrics that evaluate overall noise exposure for a sensitive receptor, regardless of the receptor's age or daily routine. CEQA does not require a lead agency to analyze or mitigate construction noise effects separately for each unique daily routine. The LA ART EIR and Draft SEIR conclude that even with implementation of all feasible mitigation measures, temporary construction noise would remain significant and unavoidable. For additional information regarding construction-noise health impacts, and the Court of Appeal's decision upholding the Final LA ART EIR on that issue, refer to Response GO4-9.*

Response GO7-5 *Refer to Topical Response 3, Construction Noise, and AECOM's Supplemental Technical Report. As the LA ART EIR and Draft SEIR conclude, temporary construction noise impacts would be significant and unavoidable even with mitigation. It is not possible to eliminate construction noise or cumulative noise entirely, especially given that the proposed Project would be constructed in an urban area. The Draft SEIR's acoustical modeling does not require or mandate that residents keep their windows closed. Rather, modeling with windows closed provides a reasonable basis for estimating noise levels given common residential behavior in urban settings. In addition, as explained in Topical Response 3, Construction Noise, the LA ART EIR and the Draft SEIR identify anticipated exterior noise levels from Project construction, which would be equivalent to the noise level experienced while standing directly in front of an open window. Therefore, this information is already provided in the Draft SEIR. No additional analysis is necessary. Also refer to Response GO4-13 of this Final SEIR. Further, concerns about utility costs or other economic effects are outside the scope of CEQA. (CEQA Guidelines, § 15131 ["Economic or social effects of a project shall not be treated as significant effects on the environment"].)*

Refer to Topical Response 3, Construction Noise, regarding the construction noise evaluation, including the use of building facade conditions. The presence of double-paned windows and residents' ability to hear existing sources such as the Metro A Line, are part of the existing environmental setting and do not alter the analysis or conclusion regarding temporary construction noise. The Draft SEIR *accounts for the existing noise environment, including nearby transit operations and typical urban noise sources. CEQA does not require the lead agency to model every conceivable overlapping event or temporary activity, and it does not require speculative analysis of worst-case combinations of unrelated noise sources. The Draft LA ART EIR used industry-standard methodologies to evaluate whether Project construction would cause a substantial temporary increase over existing ambient conditions, and the Draft SEIR considered the feasibility of building retrofitting to reduce interior construction noise levels, consistent with the Court of Appeal's direction.*

Response GO7-6 *Refer to Topical Response 3, Construction Noise, AECOM's Supplemental Technical Report, and Response GO4-13 of this Final SEIR. The Draft SEIR's modeling assumptions regarding windows does not require residents to keep windows closed, nor does it impose any obligation on occupants with respect to how they operate their homes. It is simply a standard acoustical assumption used to estimate interior noise levels under common residential conditions. Further, concerns regarding potential changes in electricity use, shared utility billing structures, or cost-of living impacts are social and economic issues, which are not treated as significant environmental effects under CEQA. (CEQA Guidelines, § 15131 ["Economic or social effects of a project shall not be treated as significant effects on the environment"].)*

Response GO7-7 *This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO7-1 through GO7-6.*

Comment GO8 **Savoy Street Neighbors**

Response GO8-1 *This comment provides a general introduction to the comments raised in this letter. Responses to the comments contained in this letter are provided below in Response GO8-2 through GO8-7.*

Response GO8-2 *a. Refer to Topical Response 5, CEQA Process for the Draft SEIR. CEQA does not require in-person meetings or mandate that informational workshops take any particular form. The Draft SEIR was circulated for the full 45-day public review period required by CEQA, and Metro provided multiple ways for the public to submit written or oral comments, including email, postal mail, voicemail, and live testimony at the noticed public hearing. Interpretation services were available during the informational workshops and the public hearing, and written and oral comments in any language were accepted during the comment period.*

b. Refer to Topical Response 5, CEQA Process for the Draft SEIR. The purpose of an informational workshop was to present the key analyses and conclusions of the Draft SEIR. CEQA does not require a question-and-answer session, and the absence of such a session did not limit public comment.

c. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Response GO-3 in this Final SEIR. Consistent with CEQA's framework for supplemental or partially recirculated EIRs on remand, Metro accepted all public comments regardless of whether they were within the scope of the Draft SEIR, included them in this Final SEIR, and prepared individualized responses where comments raised issues regarding the adequacy of the Draft SEIR or presented new environmental information.

d. Refer to Topical Response 5, CEQA Process for the Draft SEIR. Interpretation services were provided live during the public hearing, and the recording posted after the hearing reflects the audio captured through Zoom's system. All non-English comments submitted (both spoken and written) have been reviewed, translated as necessary, and responded to in the same manner as English-language comments.

e. Refer to Topical Response 5, CEQA Process for the Draft SEIR. With respect to caller phone numbers, Zoom displays dial-in caller information based on its meeting-format settings. To the extent that caller information was displayed, it did not limit the ability of any individual to participate in the public hearing. Metro will continue to evaluate ways to further improve virtual meetings, but these issues do not affect compliance with CEQA or the adequacy of the Draft SEIR.

Response GO8-3

a. Refer to Response GO4-9. As explained therein, the Draft SEIR did not include contour-style mapping because such mapping is not well-suited to construction noise. By modeling noise at each building façade using the closest possible equipment location and applying that level to the farthest horizontal location in the building, the Draft SEIR provides a conservative and more protective estimate of construction noise levels. Homes along Savoy Street feature operable windows and matching wall construction types on nearly all sides. As a result, construction noise levels would consistently be greater on the façade(s) closest to/facing the construction area (e.g., for homes at 451 and 449 Savoy Street, the southern façade would face the proposed Broadway Junction construction area and therefore, interior noise levels from construction would be greater near this façade). Interior noise levels from construction activities would attenuate within the home as one distances themselves from the most-exposed façade(s). Refer to AECOM's Supplemental Technical Report for additional information. With respect to the suggestion that temporary relocation be provided, refer to Topical Response 3, Construction Noise, which explains why a mitigation measure requiring occupant relocations would not be feasible.

b. Refer to Topical Response 3, Construction Noise. The Draft SEIR does not assume that residents "would not want" retrofitting. Rather, it explains that an acoustic retrofit program would require extensive individualized design, access to privately owned homes and rental units, structural modifications, hazardous-materials screening, interior construction work, permitting, inspection, and verification of effectiveness. These steps would need to be completed at multiple *different private properties before construction begins in order to reduce temporary construction noise.*

Individual residents undertaking their own construction work, independently hiring contractors, selecting materials, or opting to "keep the funds" instead of implementing retrofits would further undermine Metro's ability to ensure that the measure actually reduces the impact it is intended to mitigate. CEQA does not require a lead agency to adopt measures that the agency cannot successfully implement or enforce, or that hinge on voluntary decisions by third parties beyond the agency's control. Because a retrofit program lacks the ability to meet CEQA's basic feasibility and enforcement standards, CEQA does not require the Draft SEIR to develop a menu of speculative implementation options, estimated individualized homeowner construction costs, or analyze hypothetical incentive or reimbursement costs. Regarding Project funding, refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.

c. Refer to Responses GO4-13 and GO7-7 of this Final SEIR, and Topical Response 3, Construction Noise, as well as AECOM's Supplemental Technical Report. The Draft SEIR's interior noise modeling does not assume residents will keep their windows closed or run air-conditioning. The Draft SEIR's conclusions regarding significance are based on exterior noise levels, which represent the experience of standing at an open window. Further, cost-of-living impacts, including utility bill arrangements, are not a CEQA consideration. (CEQA Guidelines, § 15131 ["Economic or social effects of a project shall not be treated as significant effects on the environment"].) Metro cannot require closure of windows, and the Draft SEIR does not rely on resident behavior in determining significance.

d. Refer to Responses GO4-13 and GO5-3 of this Final SEIR, as well as AECOM's Supplemental Technical Report. The Draft SEIR does not assume residents will remain indoors. Exterior construction noise levels were evaluated in the Final LA ART EIR and referenced in the Draft SEIR. Those exterior levels represent what a person would experience while sitting or standing outdoors on patios. Temporary construction noise in urban areas can be disruptive even after feasible mitigation, and the Draft SEIR acknowledges these unavoidable temporary impacts. No feasible mitigation is available to completely eliminate the significant temporary construction noise impacts.

e. Refer to Responses Responses GO4-10 and GO5-5 of this Final SEIR and Topical Response 1, Comment Is Outside the Scope of the SEIR. Health effects of construction noise are addressed in the Final LA ART EIR. The Court of Appeal upheld that analysis. Noise significance thresholds are based on accepted community noise metrics that evaluate overall noise exposure for a sensitive receptor, rather than on individualized schedules or personal circumstances. CEQA does not require a lead agency to analyze or mitigate construction noise effects separately for each unique daily routine, such as residents working from home or *maintaining daytime sleep schedules. The LA ART EIR and Draft SEIR conclude that even with implementation of all feasible mitigation measures, temporary construction noise would remain significant and unavoidable.*

f. Refer to Responses Responses GO4-13 and GO5-5 of this Final SEIR. As described in Section 3.0 of the Draft SEIR, interior noise levels from construction are anticipated to range from 37 dBA (comparable to quiet urban nighttime noise levels) to 58 dBA (less than normal speech at three feet) with windows closed. These levels fall within the range of typical indoor residential environments and do not indicate substantial interference with indoor activities. Refer to Topical Response 3, Construction Noise, for additional discussion.

g. Refer to Responses Responses GO4-10, GO5-5, and GO8-3 (subpart j) of this Final SEIR. Refer also to Topical Response 3, Construction Noise, which explains why a mitigation measure requiring implementation of a voluntary temporary relocation program would not be feasible.

h. Refer to Response GO5-6 of this Final SEIR. The Draft SEIR acknowledges that older homes contain multiple potential pathways for noise, including roofs, wall, windows, doors, and vents. The analysis of potential retrofits accounts for these factors. The feasibility constraints identified apply equally to basement and crawlspaces. Refer to AECOM's Supplemental Technical Report for additional information.

i. Refer to Response GO5-6 of this Final SEIR and AECOM's Supplemental Technical Report, which explain that the accessible representative structure at 430 Savoy Street represented an appropriate proxy to determine façade noise reduction for older homes on Savoy. Use of this proxy represented a reasonable and conservative approach because the older Victorian-era homes typically have more pathways for exterior sound to enter than a building of the age of the representative sample. If vents must remain open (e.g., due to gas), this further supports the conclusion that the representative sample provided a conservative basis for estimating façade performance of the Victorian-era homes on Savoy.

j. Visual inspection of the interior of the home at 430 Savoy Street did not indicate the renovation (insulative upgrade) of any interior or exterior walls. With the exception of the basement unit that was presumably fitted out at a later date, the structure appeared to be in its originally constructed state. Refer to Response GO5-6 of this Final SEIR, regarding the appropriateness of the use of the accessible structure at 430 Savoy Street as a proxy to determine façade noise reduction for older homes on Savoy Street. The Draft SEIR applied conservative assumptions when evaluating façade noise reduction to ensure that the analysis did not underestimate potential interior construction noise levels. Cataloging the full construction history of the 1927 representative home is not necessary for the analysis. Any renovations or improvements made since 1927 would generally *increase the level of building attenuation and would therefore produce equal or lower interior noise levels than those presented.*

k. Refer to Responses GO5-6 and GO8-3 (subpart o) of this Final SEIR. The single measurement provided in the comment is not directly comparable to the Draft SEIR analysis because it captures interior noise levels during a musical event, not during the specific construction phase or equipment configurations modeled in the Draft SEIR. The Draft SEIR applies conservative assumptions and was validated by real-world testing at two representative receptors, as explained in Appendix A to the Draft SEIR and AECOM's Supplemental Technical Report.

l. Refer to Topical Response 3, Construction Noise. As discussed in Section 3.0 of the Draft SEIR, temporary construction noise impacts would remain significant and unavoidable even with feasible mitigation, but they would only occur during permitted daytime construction hours. CEQA does not require the lead agency to provide business-specific operational or economic impact analyses. (CEQA Guidelines, § 15131). Refer to Response GO3-2 in this Final SEIR, and Section 2.0, Corrections and Additions, of this Final SEIR for a discussion of how NOI-PDF-B was revised to expand community outreach to include small businesses and in multiple languages. Refer to Final LA ART EIR, Topical Response N, Environmental Justice, for discussion of how the proposed Project would not displace businesses and how the proposed Project represents an opportunity to drive customers to businesses along the alignment, which, consequently, would add revenues to these small businesses. Refer to Final LA ART EIR, Topical Response C, Project Features, for discussion of how, during construction, the Project Sponsor would create a Business and Community Support Program to assist local businesses affected by proposed Project construction activities. The proposed Project would provide numerous benefits to local businesses in El Pueblo, Chinatown, and other areas along the proposed Project alignment, including through potential partnerships with these businesses as well as by providing an accessible and affordable mobility option for employees and area residents. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of how the proposed Project will have less than significant aesthetic impacts, including to El Pueblo. Finally, the LA ART EIR identified and analyzed all significant and unavoidable construction noise impacts, including along Alameda Street, and Mitigation Measure NOI-A includes mitigation measures for construction of the Alameda Station. Refer to Section 4.0, Mitigation Monitoring and Reporting Program, of this Final SEIR.

m. Refer to Topical Response 3, Construction Noise, and Response GO5-8 in this Final SEIR for discussion of restrictions on construction hours. Nighttime construction is prohibited under the LAMC, and all construction would occur only during permitted daytime hours. In addition, LAMC Section 112.05 sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet between 7:00am and 10:00pm when operated within 500 feet of a residential zone, unless technically infeasible. These limits reflect standard City practice for managing construction noise in dense urban settings and ensure that noise-

generating activities do not occur during evening or nighttime rest periods. Reducing the allowable daytime construction window, such as by eliminating morning or afternoon hours, would meaningfully slow the pace of work and require construction to remain active in the area for a longer period, thereby increasing, rather than decreasing, the total duration of temporary noise exposure for surrounding residents and businesses. Major construction elements (e.g., columns, foundations, station platforms, utility relocations, crane operations) also often require continuous daytime work blocks for safety and engineering reasons. Reducing the permitted construction hours would prolong the duration of construction activities and increase the period during which nearby residences and businesses experience temporary disruptions. Accordingly, further limiting construction hours is not feasible and would jeopardize the ability to complete construction efficiently and safely. With respect to LA28, refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information.

n. Exterior and interior storm windows do have the capacity to provide additional noise reduction to older homes where windows may be the primary source of exterior noise intrusion. However, due to the construction of the older homes on Savoy Street and observations made during the façade noise reduction testing performed at 430 Savoy Street regarding noise transmitting through uninsulated walls and roof assemblies, the benefit of storm window installation is expected to be limited. Noise would still transmit into the living spaces through these additional pathways, thereby eroding the potential noise reduction benefit gained from storm window installation. Installation of storm windows at the newer buildings would not be expected to reduce transmission of construction noise in a material way. First, storm windows are generally designed with a focus on thermal retention. Therefore, any noise reduction benefit is secondary. Second, the new buildings surveyed were all observed to have modern, double-paned windows. The installation of storm windows on existing double-paned windows, to the extent they resulted in any noise reduction, would be unlikely to result in a reduction that is notably perceptible to the building's occupant.

Response GO8-4

a. This comment is incorrect. Refer to Topical Response J, Gondola Design and Operations, and Section 6.0, Responses to Comments, of the Final LA ART EIR, for a discussion of the gondola amenities, including a heating, ventilation, and air conditioning system. There have been no changes to these proposed amenities and the Court of Appeal did not require Metro to reconsider this issue. As discussed in the Final LA ART EIR, pursuant to NOI-PDF-A, the gondola cabins would be designed with an interior-to-exterior noise reduction rating of no less than Sound Transmission Class (STC) 35 and, if heating, ventilation, and air conditioning (HVAC) units are included in the gondola cabin design, they must be designed with a sound power level of no more than 71 dBA. Pursuant to GHG-PDF-A, electrical power for the Project's operation would be supplied by the Los Angeles Department of Power and Water's Green Power Program, meaning that the Project's primary electricity usage would come from renewable sources.

b. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Final LA ART EIR, Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage. The proposed Project's signage would be designed to be consistent with Metro requirements, including Metro's Advertising Content Guidelines, as applicable, which are updated from time to time. Metro's Advertising Content Guidelines include a number of restrictions on advertising including prohibiting the advertising of all alcohol, tobacco, and cannabis products, services, and events. Metro's Advertising Content Guidelines also provide that advertising may not be displayed if its content involves: illegal activity; violence; demeaning or disparaging matter; vulgarity; obscene matter; adult entertainment and content; political endorsements; religion; negative connotations of public transit; unsafe transit behavior; content injurious to Metro's interests; or content harmful or disruptive to the transit system. The scope of the supplemental review process is limited to construction noise mitigation and trustee-agency consultation. The Court of Appeal did not require Metro to revisit operational issues or Metro's advertising policies. The commenter's concerns relate to the hypothetical possibility that Metro's systemwide advertising policy might change in the future. CEQA, however, requires an EIR to evaluate the environmental effects of the proposed project, not speculative future policy changes that may or may not occur. (CEQA Guidelines, § 15145.) If any future policy changes were proposed, such policy change would be subject to its own CEQA review and approval process.

c. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the privacy concerns related to the proposed Project. Cabin windows can be equipped with privacy glass that can become opaque when adjacent to sensitive areas, and the proposed Project would work with stakeholders adjacent to the proposed Project alignment to identify locations where the use of privacy glass would be warranted. The Court of Appeal did not order Metro to revisit the issue of privacy in the supplemental review and there have been no changes to the proposed privacy features.

d. Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for a discussion of why new information concerning LA28 does not trigger the need for further environmental review of the proposed Project under CEQA. See also Final LA ART EIR, Response GO14-42, which explains that the LA ART EIR evaluated the proposed Project ridership and vehicle miles traveled (VMT) effects associated with major events, including a full analysis of event-based travel demand for both Dodger Stadium and LASHP. Even if Olympic satellite parking occurs at Dodger Stadium, such use would reflect existing regional event-management practices, not a new condition resulting from the proposed Project. CEQA does not require Metro to speculate about temporary parking and traffic management decisions made by other entities for discrete future events. The Final LA ART EIR already includes a complete and conservative analysis of the proposed Project's transportation and VMT effects, including during major event days.

e. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information. Issues relating to Project directives adopted with Metro's approval of the original LA ART EIR are outside the scope of this SEIR. Condition F of Metro Motion 12.1 is not a CEQA mitigation measure, but rather was adopted by Metro pursuant to its approval authority. All comments, including this one, have been forwarded to the decisionmakers for their consideration.

f. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information. The LA ART Project is a stand-alone transit project with independent utility. The Project does not propose, authorize, or rely on any development of the Dodger Stadium parking lots. The Court of Appeal considered this assertion and did not find that development of Dodger Stadium parking lots was a reasonably foreseeable consequence of the proposed Project. The Court upheld Metro's and the trial court's conclusion that no improper segmentation occurred. Alleged statements by unnamed individuals do not constitute substantial evidence that development of the parking lots is planned, proposed, or reasonably foreseeable. Nothing in the record since Metro's original approval of the Project alters that conclusion.

Response GO8-5

a. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the Project alignment. As described in the LA ART EIR and shown in Figure 2-2, Proposed Project Alignment, of the Draft SEIR, and in multiple plan-view and aerial depictions throughout the LA ART EIR, the Project Sponsor has taken steps to minimize the effects of the proposed Project on the park's high-value open space. This has included collaboration with the Department of Parks and Recreation resulting in selecting a primary alignment along the western edge of LASHP, rather than through the middle of the park, in order to reduce visual and other park impacts. This location is adjacent to and crossing over the existing Metro A Line, a light-rail train with an overhead catenary system, and the western pedestrian walkway within the park which has existing trees along both the west and east side of the walkway. The Chinatown/State Park Station would have a footprint of 2,195 square feet in the park, and the station canopy would have an overhang of 9,320 square feet over the park (including the 2,195-square-foot footprint in the park). As shown in Figure 5-2 of the Draft EIR, more than 30 of the park's 32 acres are not beneath the proposed Project's alignment.

b. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the Project alignment. Refer to Draft LA ART EIR, Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, for a discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Key Observation Points (KOPs) critical or representative of the visual character of the area were identified within each Landscape Unit (LU) and utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed

Project. The comment's concerns the use of a conceptual image, not the adequacy of the Draft SEIR. The Draft SEIR and the original LA ART EIR do not rely on the image referenced in the comment as part of the technical environmental analyses. All required CEQA analyses were based on scaled engineering drawings, cross-sections, and similar technical specifications. The use of a conceptual image for the EIR cover does not undermine the Draft SEIR's function as an informational document.

c. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's capacity. Refer to Final LA ART EIR, Appendix H.2, Supplemental KOPs in Response to Comments, for additional visual simulations of the proposed Project, including a depiction of the system operating at maximum capacity with passengers within the cabins. Refer to Final LA ART EIR, Section 5.0, Corrections and Additions, for an evaluation of the updated and additional KOPs, which demonstrates that the proposed Project would not result in significant impacts. The LA ART EIR analyzed the Project's operational characteristics using engineering plans, cross-sections, and similar technical specifications, rather than illustrative figures. CEQA does not require visual renderings to depict peak-load conditions.

d. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the Los Angeles State Historic Park General Plan Amendment, how the proposed Project will not interfere with park uses, and tree removal and replacement. Regarding tree replacement, pursuant to BIO-PDF-F (Tree Replacement), trees removed on State Parks property would be replaced at a minimum 1:1 ratio or as otherwise agreed upon by State Parks through its General Plan Amendment process. Refer to Final LA ART EIR, Topical Response F, Los Angeles State Historic Park, for discussion of the proposed Project's mitigation measures. Mitigation Measure LUP-A would be implemented to require the proposed Project to obtain an amendment to the Los Angeles State Historic Park General Plan. Refer to Final LA ART EIR, Topical Response I, Use of Project Design Features and Plans in Mitigation Measures, for discussion of why the proposed Project's mitigation measures are not deferred. Refer to Draft LA ART EIR, Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, for discussion of the KOPs in LASHP. The proposed Project's aesthetic impacts would be less than significant.

Response GO8-6 *a. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 5, CEQA Process for the Draft SEIR. As explained in Topical Response 5, Metro's informational webpage concerns the NEPA/CEQA Process; the 30-day NEPA comment period on a Final EIS does not apply here because the proposed Project is not subject to NEPA. The Court of Appeal did not require, and CEQA does not require, recirculation of the entire EIR or revisiting topics beyond those identified by the Court of Appeal. Except with respect to construction noise mitigation and SMMC consultation, issues regarding the adequacy of the LA ART*

EIR were resolved in the litigation and are outside the scope of supplemental review.

b. Refer to Response P3-1.

c. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 5, CEQA Process for the Draft SEIR. Allegations that Metro has acted with impropriety or undue influence are incorrect. Metro is the lead agency for environmental review of transportation projects within Los Angeles County, regardless of whether the initiating applicant is a public or private entity. As with other CEQA projects, Metro exercises independent judgment and oversight over all environmental analysis. Nothing in the LA ART EIR, the Draft SEIR, the Court of Appeal's Opinion, or the entire administrative record, supports the assertion that Metro has been "paid to shepherd" the Project, that Metro has compromised its neutrality, or that Metro has allowed the Project Sponsor to dictate the outcome of environmental review. All studies have been performed under Metro's direction, reviewed by Metro staff and consultants, and subject to Metro's independent evaluation. CEQA expressly allows applicants to fund environmental studies as long as the lead agency independently reviews the document, which must reflect the agency's independent judgment, which is the case here. (Pub. Resources Code, § 21082.1; CEQA Guidelines, § 15084.) Metro's preparation of the EIRs for the LA ART Project reflects the same independent judgment required of every CEQA lead agency.

d. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's costs and financial analysis. Issues related to project financing, potential cost overruns, past private development projects in Los Angeles, related fire incidents, or hypothetical future abandonment of a project site are not CEQA environmental impacts. (See CEQA Guidelines, § 15131.) Metro's role under CEQA is to evaluate the potential significant environmental impacts of the proposed Project and to identify feasible mitigation measures or alternatives that reduce significant impacts to the extent feasible. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion regarding environmental justice concerns.

Response GO8-7

a. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for discussion of the Project Alternatives considered, including the No Project Alternative and the Transportation Systems Management Alternative. The LA ART EIR evaluated a reasonable range of alternatives in compliance with CEQA, including the No Project Alternative. The Court of Appeal upheld Metro's evaluation of alternatives. The Court did not order Metro to consider additional alternatives, including expansion of the Dodger Stadium Express. For additional information regarding a possible expansion of Dodger Stadium Express, refer to Response GO4-22 of this Final SEIR. Regarding vehicle miles traveled (VMT) and greenhouse gas emissions assumptions, the comment *disagrees with the methodologies included in the LA ART EIR, but those methodologies were part of the LA ART EIR and are not reopened by the Court's remand, including assumptions about trip lengths, mode share, and baseline transit behavior. There is no new information or changed circumstances that would materially alter the LA ART EIR's analysis of operational VMT or greenhouse gas emissions impacts. Therefore, no revisions to the alternatives analysis are required, and no additional alternatives must be added to this SEIR. Refer to Section 3.03, Air Quality, Section 3.08, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices, of the Draft LA ART EIR, for discussion of the proposed Project's ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gas emissions through reduced vehicular travel. Refer to Topical Response B, Ridership Model; Queueing at Stations and Pre-game and Post-game Transportation, of the Final LA ART EIR for discussion of the proposed Project's ridership model which is based on extensive data sources and assumptions validated by data.*

b. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the Dodger Stadium Express. Refer to Response GO4-22 of this Final SEIR for additional information regarding a possible expansion of Dodger Stadium Express.

c. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Response GO4-22 of this Final SEIR for discussion of the Dodger Stadium Express. The comment addresses alternative transit strategies and broader policy choices, which are outside the scope of the SEIR and the corrective actions required by the Court of Appeal. CEQA requires an EIR to evaluate a reasonable range of alternatives that would feasibly achieve most of the basic project objectives while minimizing or avoiding one or more significant impacts. The original LA ART EIR evaluated such a reasonable range and the Court of Appeal upheld that evaluation. Nothing in the LA ART EIR or the Draft SEIR prevents Metro or other agencies from continuing to operate or expand the Dodger Stadium Express, including potential electrification, but those operational decisions fall outside CEQA and outside the scope of this SEIR. Accordingly, no further analysis or revision is required.

d. Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion of the proposed Project's benefits, including pedestrian access improvements and establishment of mobility hubs at Chinatown/State Park Station and Dodger Stadium Station where passengers would be able to access a suite of first/last mile multi-modal options, such as a bike share program. Refer to Section 5.0, Corrections and Additions, of the Final LA ART EIR, for discussion of a Pedestrian Enhancement Alternative to the proposed Project in which the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the *safety, comfort, and accessibility of walking between the Metro A Line Station and Dodger Stadium. This alternative was considered but dismissed from further detailed analysis because it did not meet most of the basic objectives of the proposed Project. Nothing in the LA ART EIR precludes the City or Metro from pursuing pedestrian or bicycle improvements in the Dodger Stadium area as part of separate planning processes. However, CEQA does not require those speculative future improvements to be addressed in the SEIR, and no further analysis or revisions are required.*

Response GO8-8 *This comment provides a general conclusion regarding the comments raised in this letter. Responses to the comments contained in this letter are provided above in Responses GO8-2 through GO8-7.*

3.3.5 Responses to Public/Individuals' Comment Letters

The original comment letters discussed in this section can be found in Appendix A. Where these comment letters contained comments warranting individual responses, those comments are bracketed and assigned a comment number (ex. P1-1, P2-1, etc.).

Where comment letters contained general comments about the Project that did not raise significant environmental issues pertaining to the sufficiency or adequacy of the Draft SEIR, they are responded to in Section 3.3.1, Response to General Comments on the Project.

Comment P1 **Susan Miller**

Response P1-1 *Refer to Topical Response 3, Construction Noise.*

Comment P2 **Anne Dorsey**

Response P2-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, for discussion about Project Alternatives.*

Regarding the Elysian Park People's Transit Vision, the commenter did not provide a copy of the "Gabriel Owen-Flores Presentation." Regardless, the Elysian Park People's Transit Vision with 3 bus routes for year-round service in Elysian Park and Dodger Stadium is unlikely to achieve the same level of ridership as the proposed Project, and otherwise fails to meet most of the Project Objectives, which seek to achieve the proposed Project's underlying purpose of providing a permanent direct transit connection between LAUS and the Dodger Stadium property and improving connectivity for surrounding communities, including Chinatown, Mission Junction, Elysian Park, Solano Canyon, and LASHP. Improving the connection between LAUS and Dodger Stadium via the proposed Project would provide the quickest, most frequent, and highest capacity transit connection for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region. As discussed in Final LA ART EIR, Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options, a system of bus routes transporting riders from various locations throughout the Los Angeles region to and from Dodger Stadium events would require a substantial increase in the number of buses which, similar to expanding the fleet for an expanded Dodger Stadium Express service, would result in a fleet of buses that would either be underutilized most of the time or regular Metro bus service that utilizes these vehicles would be disrupted every time a Dodger game or event at the stadium is held. Such a service would also incur substantial costs in paid time and mileage for driving empty buses out to these locations before a game and back from the locations after a game and paid idle time during the game. Buses would also need to travel in rush hour congestion to get to Dodger Stadium. With limited regional facilities that provide bus only lanes that these services could utilize, they would not materially *improve transit travel time compared with driving.[2] As discussed in the Alternatives analysis of the LA ART Draft EIR, in order to achieve the same level of ridership as the proposed Project, the Elysian Park People's Transition Vision would need to provide 77 bus trips per hour, or an average of 1 bus departing approximately every 47 seconds. It is not demonstrated that the Elysian Park People's Transit Vision would be able to meet these standards. Moreover, the buses utilized for the Elysian Park People's Transit Vision would still operate vehicles on the roadway, thereby contributing to VMT and greenhouse gas emissions. The proposed Project would operate at zero emissions, result in a reduction of more than 30,000,000 VMT, and significantly reduce greenhouse gas emissions in the proposed Project's corridor. Therefore, improving the connections between Dodger Stadium and LAUS via the proposed Project would provide the quickest, most frequent, and highest capacity transit connections for the greatest number of riders traveling to Dodger Stadium to have the most travel time competitive transit trips from more locations in the region.*

For a discussion of the Transportation Systems Management Alternative for an enhanced Dodger Stadium Express, including bus lane improvements, increased boarding access, expanded bus routes throughout Los Angeles County, and the use of electric buses, refer to Final LA ART EIR, Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options. For a discussion of the Pedestrian Enhancement Alternative, please refer to Final LA ART EIR, Section 5.0, Other CEQA Considerations.

Regarding Car-Free Dodger Days to promote walking and biking to Dodger Stadium, Metro and the Project Sponsor are supportive of all alternative forms of transportation including walking, biking, and public transit. As detailed in the LA ART Final EIR's discussion of the Pedestrian Enhancement Alternative in Section 5.0, Corrections and Additions, while there are some Dodger game attendees who currently choose to walk to and from Dodger Stadium, the walk would take approximately five to eight times as long as the ride on the proposed Project, and the path would be on a steep downward grade that does not meet Americans with Disabilities Act Accessibility Guidelines, and would be challenging for children, seniors, or people with limited physical mobility. The walk times for an average walker would take approximately 25 minutes from the proposed location of the proposed Dodger Stadium Station to the Metro A Line Station and 35 minutes to LAUS, compared to the three-minute ride to the Chinatown/State Park Station (over eight times faster) and the seven-minute ride to the Alameda Station (over five times faster) on the proposed Project. Refer to Final LA ART EIR, Section 5.0, Corrections and Additions, for a discussion of the Pedestrian Enhancement Alternative, which would include widened and improved sidewalks with enhanced safety features and an escalator up the hill to Dodger Stadium. This alternative was considered but dismissed due to limitations on travel time

2 This calculation assumes the use of 45-foot buses with 65-passenger capacity.

and grade. Car-Free Dodger Days would face similar limitations. As described in more detail in Draft LA ART EIR, Section 2.0, Project Description, the Project Objectives include enhancing safety by reducing the number of vehicles in the Dodger Stadium area, reducing transportation-related pollution and greenhouse gas emissions as a result of reduced vehicular congestion, and enhancing community connectivity by providing first/last mile transit and pedestrian access. Refer to Final LA ART EIR, Topical Response C, Project Features, for a discussion of the proposed Project's pedestrian access enhancements, which include pedestrian improvements between Metro's A Line Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structures, and potential seating, as well as support for the future LASHP bike and pedestrian bridge. The proposed Project would also include pedestrian enhancements and drought tolerant landscaping and open space enhancements, including at the Alameda Triangle, LASHP, and along the pedestrian pathway connecting Dodger Stadium Station and Dodger Stadium, and improved access to LASHP and Elysian Park. The Dodger Stadium Station would include a mobility hub where passengers would be able to access a suite of first/last-mile transit and multimodal options, such as a bike share program. The proposed Project could accommodate approximately 20 percent of fans attending Dodger games and is the most efficient, mobility friendly method to reduce vehicles on the road. For a discussion of the LA ART EIR's consideration of the expansion of the DASH and Metro Micro services, please refer to Final LA ART EIR, Response GO12-25, Response P549-3, and Topical Response H, The Draft EIR Considered an Appropriate Range of Alternatives and Design Options. These alternatives have been dismissed from further consideration due to the inability to meet the proposed Project's objectives.

The comment also characterizes existing conditions for residents during Dodger games and asserts that residents have limited access to the surrounding streets during games. By providing an aerial transit system, the proposed Project would shift riders who are currently driving to the regional transit network.

Response P2-2 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. Refer also to Draft LA ART EIR, Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, and Final LA ART EIR, Appendix G, Supplemental Biological Resources Report. The proposed Project would implement BIO-PDF-F and adhere to ordinances and requirements applicable to tree replacement, based on the corresponding jurisdiction of the property where each tree is located. Refer to Draft LA ART EIR, Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, for discussions of the aesthetic impacts of the proposed Project, which would be less than significant, including at LASHP. Refer to Final LA ART EIR, Topical Response K, Signage and Lighting, for discussion of the proposed Project's signage.*

Response P2-3 *Refer to Responses G020-16 and GO29-6 of the Final EIR for discussion regarding California's 30x30 initiative.*

Comment P3 **Phyllis Ling**

Response P3-1 *Refer to Topical Response 3, Construction Noise. The Draft SEIR was prepared in accordance with CEQA and consistent with the scope defined by the Superior Court's writ of mandate. The Draft SEIR appropriately focused on the issue of construction noise mitigation while incorporating by reference the analysis and findings of the prior LA ART EIR. The supporting AECOM Acoustic Technical Report was provided in the appendices to ensure full transparency and allow interested members of the public to review the information underlying the Draft SEIR's analysis. The Draft SEIR is organized and presented consistent with CEQA's goal of providing clear, concise, and focused information to decisionmakers and the public.*

CEQA does not require lead agencies to hold in-person meetings. Moreover, CEQA Guidelines Section 15201 does not require lead agencies to hold hearings at any stage of the environmental review process. The Project is proceeding under Public Resources Code section 21168.6.9, which provides for streamlined judicial review of certain transit projects that reduce greenhouse gas emissions, known as "environmental leadership transit projects." Appendix B of the Draft SEIR provides the text of Section 21168.6.9. Under Section 21168.6.9(e)(3) and (e)(4), the lead agency must: (1) conduct an informational workshop to present the key analyses and conclusions of the Draft EIR within 10 calendar days of its release; and (2) hold a public hearing to receive testimony on the Draft EIR. The statute does not prescribe the format of these meetings or require that they be conducted in-person. Consistent with these provisions, Metro conducted an informational workshop that presented the key analyses and conclusions of the Draft EIR on October 9, 2025, and a public hearing on November 6, 2025. Testimony from the public was received during the public hearing. Both meetings offered simultaneous interpretation in Spanish, Cantonese, Taishanese, and Mandarin to ensure accessibility for non-English speakers.

In addition to conducting the informational workshop and public hearing, Metro posted the presentations and recordings of both meetings on its website for on-demand viewing at any time (https://www.metro.net/projects/aerial-rapid-transit/). The presentations are provided in English Spanish, Chinese (Traditional), and Chinese (Simplified). The Notice of Availability (NOA) for the Draft SEIR was also translated into these languages and distributed via mail and posted online on September 29, 2025. The NOA provided information about how to participate in the informational workshop and public hearing for the SEIR, consistent with Metro's standard procedures and Public Resource Code section 21168.6.9. The NOA and notice of the informational workshop and public hearing was also published in the Los Angeles Times, Los Angeles Sentinel, La Opinión, and Sing Tao newspapers.

Further, to ensure in-person access to materials, hard copies of the LA ART EIR and the Draft SEIR were made available for public review at four libraries within the Project area, as identified in the NOA. Moreover, Metro accepted public *comments through multiple methods, including online, by phone, and by mail, throughout the 45-day public review period, and Metro accepted comments in any language.*

These efforts meet and exceed CEQA's procedural requirements for public participation. Metro provided multiple avenues for the public, including non-English speakers, to review and comment upon the Draft SEIR. Accordingly, the comment's assertion that the public was deprived of the opportunity to understand or participate in the SEIR process is not supported.

Please refer to Topical Response 2, Request for Consultation with the Santa Monica Mountain Conservancy. As discussed in that response, Metro, as the Lead Agency, has fulfilled its obligation under CEQA to provide notice and consultation opportunities to SMMC. While the Lead Agency must offer these opportunities, Trustee Agencies are not required to respond or participate in consultation. The Lead Agency cannot compel a Trustee or Responsible Agency to provide comments if they elect not to do so. Metro also provided consultation opportunities to the agencies with jurisdiction over the specific resources identified in the comment. Los Angeles Plaza Park and Placita de Dolores (both part of the El Pueblo de Los Angeles Historical Monument) and Elysian Park are within the jurisdiction the City of Los Angeles. LASHP is within the jurisdiction of the California Department of Parks and Recreation (State Parks). Both the City of Los Angeles and State Parks were identified as Responsible Agencies in the LA ART EIR and received all required notice and opportunity to consult. In addition, both the City of Los Angeles and State Parks participated the LA ART EIR's preparation, and State Parks submitted written comments on the LA ART EIR. Accordingly, Metro has met all CEQA consultation and notice obligations. While the SMMC and other agencies will independently choose whether to provide input on the SEIR, their decision not to consult, respond, or comment on the SEIR does not indicate a deficiency in the SEIR process. On November 18, 2025, SMMC submitted a comment letter on the Draft SEIR. In accordance with CEQA, Metro prepared responses to SMMC's comments, which are included in Response PA1-1 through PA1-3 in this Final SEIR.

As explained in Topical Response 1, Comment is Outside the Scope of the SEIR, the Draft SEIR was prepared in response to the Court Opinion regarding the adequacy of the LA ART EIR's construction noise mitigation analysis. Consistent with the Court's direction, the Draft SEIR is narrowly focused on that issue and provides additional analysis of the feasibility of retrofitting existing buildings and revisions to Mitigation Measure NOI-A (Construction Noise Management Plan) to ensure CEQA compliance.

As explained in Sections 1.3 and 1.4 of the Draft SEIR, the Court of Appeal upheld Metro's analyses and conclusions on all other environmental topics. Those portions of the LA ART EIR remain valid and were not reopened for further review. Under CEQA and established case law, an agency is not required to re-evaluate or *recirculate portions of an EIR that were upheld or not challenged in litigation. (See Citizens for Open Govt. v. City of Lodi (2012) 205 Cal.App.4th 296, 325-327; Ione Valley Land, Air & Water Defense Alliance, LLC v. County of Amador (2019) 33 Cal.App.5th 165, 171.) Accordingly, the NOA and the Draft SEIR properly informed reviewers that comments should focus on the analysis contained in the Draft SEIR. Commenters were nonetheless free to raise any issues, including identifying any new information or changed circumstance that could reasonably affect the conclusions of the prior EIR. Such comments have been fully addressed in this Final SEIR. All comments submitted during the public comment period have been reviewed, included in this Final EIR, and provided to the decisionmakers.*

As further explained in Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, new information warrants additional environmental review only if it would change the document in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project, or on a feasible way to mitigate or avoid such an effect that the project's proponent has declined to adopt. (See CEQA Guidelines, §§ 15088.5(a) and 15162(a).) No such conditions exist here. Based on substantial evidence in light of the whole record, and as further discussed in Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, none of the changes since certification of the LA ART EIR trigger further CEQA review. Except with respect to the narrow construction noise mitigation issues identified in the Court Opinion, the conclusions of the LA ART EIR remain valid.

In April 2025, it was announced that Dodger Stadium will be the official venue for baseball at LA28. Dodger Stadium regularly hosts large special events, including Major League Baseball games and concerts. Dodger Stadium is the largest Major League Baseball stadium in terms of capacity, with approximately 56,000 seats. As discussed in Draft LA ART EIR, Section 2.3.7, Project Description: Purpose and Need, Dodger Stadium is one of the region's most visited venues, with approximately 100 baseball games and other events each year.

At the time of LA ART EIR preparation, it was not reasonably foreseeable whether and to what extent Dodger Stadium would be used for LA28. Therefore, the LA ART EIR did not analyze whether Dodger Stadium would or would not be a venue for LA28. Although it is now known that Dodger Stadium will be a venue for LA28, the analysis of the LA ART EIR does not change for the reasons discussed below.

To the extent Project construction overlaps with LA28, the LA ART EIR analyzed potential construction traffic impacts in the Project Area under conditions that accounted for stadium events drawing large regional crowds. Dodger Stadium being used as the venue for baseball at the LA28 would be similar to baseball games and other special events held at Dodger Stadium and considered in the analysis.

To address potential temporary impacts from construction traffic, the proposed Project would implement Mitigation Measure TRA-B: Construction Traffic Management Plan. Under Mitigation Measure TRA-B, the Project Sponsor, transportation engineers, and construction contractor must prepare a detailed Construction Traffic Management Plan (CTMP), approved by the City of Los Angeles prior to issuance of building permits, that specifies street closures, detours, haul routes, staging areas, worker parking, and delivery schedules. The CTMP must ensure continued access for residents, businesses, and emergency services, and it must be coordinated with LADOT, the Los Angeles Fire Department, and other relevant agencies. The plan would require monthly coordination meetings with City staff and contractors for nearby projects to avoid overlapping disruptions, as well as provisions for off-site truck staging, scheduling of deliveries during off-peak periods, and maintenance of pedestrian and school crossings in consultation with LADOT. To the extent construction of the Project overlaps with special events, such as the Olympics, the CTMP would be updated to reflect event schedules, traffic control measures, and coordination with City agencies to maintain emergency access and safe travel conditions. Implementation of Mitigation Measure TRA-B would ensure that any Project-related construction during LA28 would be carefully managed, and the associated construction-related traffic impacts would remain less than significant.

Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information for a discussion of why a June 23, 2025, opinion piece by Joshua Schank in the Los Angeles Daily News does not constitute new information or changed circumstances requiring further CEQA review.

As summarized in Topical Response 1, Comment Is Outside the Scope of the SEIR, the proposed Project's capital, operation, and maintenance costs and planned sources of funding remain as described in Final LA ART EIR, Section 4.0, Costs and Financing, and Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis. The proposed Project's capital funding would primarily be sourced from private bond financing serviced by revenue from the proposed Project. No public funds – including Metro, local agency funds, or state sources – have been sought or committed to the proposed Project. Further, costs are not a CEQA issue.

The February 22, 2024, Metro Board action approving the Project also adopted Motion 12.1, which requires Metro, in coordination with ZET, to provide quarterly updates to the Metro Board on the Project's progress and financing. Since that time, the Project has been the subject of ongoing CEQA litigation and preparation of a court-ordered SEIR. As a result, the Project has not advanced to the stage where substantive progress or financing updates are available to provide to the Metro Board. Quarterly Metro Board updates would occur if the Project proceeds beyond the supplemental environmental review and re-consideration process.

Questions regarding detailed financial modeling, updated cost estimates, or revenue projections are outside the scope of CEQA and the court-ordered SEIR. Further, as explained in Final LA ART EIR, Topical Response L, Project Sponsor and Proposed Project Costs and Financial Analysis, costs are not a CEQA issue, and no further response is required by CEQA. Nevertheless, refer to Topical Response L for information regarding the proposed Project's capital costs.

Comment P4 **Jennifer Robinson**

See Response P3-1.

Comment P5 **Hans Deustch**

See Response P3-1.

Comment P6 **Louise Cowen**

See Response P3-1.

Response P6-1 *See Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Comment P7 **Jennifer Malins**

See Response P3-1.

Comment P8 **Anne Dorsey**

See Response P3-1.

Comment P9 **Josephina Sykes**

See Response P3-1.

Comment P10 **Gavin Brennan**

See Response P3-1.

Comment P11 **Merle Freeman**

See Response P3-1.

Comment P12 **Michael Powers**

See Response P3-1.

Comment P13 **Dave Ptach**

See Response P3-1.

Comment P14 **Diana Beardsly**

See Response P3-1.

Comment P15 **Megha Kohil**

See Response P3-1.

Comment P16 **Elvin Vu**

See Response P3-1.

Comment P17 **Neel Keller**

See Response P3-1.

Comment P18 **Tim O'Brien**

See Response P3-1.

Comment P19 **Miro Horberg**

See Response P3-1.

Comment P20 **Elonda Norris**

See Response P3-1.

Comment P21 **Lisa Karahalios**

See Response P3-1.

Comment P22 **Maria Dexina**

See Response P3-1.

Comment P23 **Danton Miller**

See Response P3-1.

Comment P24 **Robert Tom**

See Response P3-1.

Comment P25 **Nicole Antonie**

See Response P3-1.

Comment P26 **Julia Carso**

See Response P3-1.

Comment P27 **Kevin M**

See Response P3-1.

Comment P28 **Julie Rico**

See Response P3-1.

Comment P29 **Debra Spinelli**

See Response P3-1.

Comment P30 **Melissa Powers**

See Response P3-1.

Comment P31 **Dane Giesregen**

See Response P3-1.

Comment P32 **Kim Silverstein**

See Response P3-1.

Comment P33 **Amber Espinosa-Jones**

See Response P3-1.

Comment P34 **Tori Lucifora**

See Response P3-1.

Comment P35 **Anita Carachure**

See Response P3-1.

Comment P36 **Edward Costello**

See Response P3-1.

Comment P37 **Juli Kang**

See Response P3-1.

Comment P38 **Sue Yank**

See Response P3-1.

Comment P39 **Sari Navarro**

See Response P3-1.

Comment P40 **Bettina Moss**

See Response P3-1.

Comment P41 **Matthew Orlove**

See Response P3-1.

Comment P42 **Eduardo Borrego**

See Response P3-1.

Comment P43 **Elliot Fong**

See Response P3-1.

Comment P44 **Melissa Melendez**

See Response P3-1.

Comment P45 **Eric Nobunaga**

See Response P3-1.

Comment P46 **Abraham Ahn**

See Response P3-1.

Comment P47 **Minerva Flores**

See Response P3-1.

Comment P48 **Robin Blackman**

See Response P3-1.

Comment P49 **Jared Jeffries**

See Response P3-1.

Comment P50 **Jason Moritz**

See Response P3-1.

Comment P51 **Kate Wolf**

See Response P3-1.

Comment P52 **Melissa Finell**

See Response P3-1.

Comment P53 **Victoria Brandon**

See Response P3-1.

Comment P54 **Yvonne Diaz**

See Response P3-1.

Comment P55 **Manuel Perez**

See Response P3-1.

Comment P56 **Rachelle Arsian**

See Response P3-1.

Comment P57 **Laraine Moniz**

See Response P3-1.

Comment P58 **Jennifer Kao**

See Response P3-1.

Comment P59 **Megan Singleton**

See Response P3-1.

Comment P60 **Leo Charbonneau**

See Response P3-1.

Comment P61 **Alicia Diaz**

See Response P3-1.

Comment P62 **Jimmy Yan**

See Response P3-1.

Comment P63 **Matthew Dubois**

See Response P3-1.

Response P63-1 *See Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Comment P64 **Judith Rogers**

See Response P3-1.

Comment P65 **Veronica Huerta**

See Response P3-1.

Comment P66 **Alice Kordosh**

See Response P3-1.

Comment P67 **Allen Glass**

See Response P3-1.

Comment P68 **Marion White**

See Response P3-1.

Comment P69 **Marion Siu**

See Response P3-1.

Comment P70 **Lilah Mehri**

See Response P3-1.

Comment P71 **Frances Tait**

See Response P3-1.

Comment P72 **Erica Goebel**

See Response P3-1.

Comment P73 **Sarajo Frieden**

See Response P3-1.

Comment P74 **Rick Teplitz**

See Response P3-1.

Comment P75 **Natalie Zarowny**

See Response P3-1.

Comment P76 **Karin Costello**

See Response P3-1.

Comment P77 **Cayla McCrae**

See Response P3-1.

Comment P78 **Christopher Fudurich**

See Response P3-1.

Comment P79 **Gabriela Arroyo**

See Response P3-1.

Comment P80 **Alan Ehrlich**

See Response P3-1.

Comment P81 **Daniel Brewer**

See Response P3-1.

Comment P82 **Donald Sloper**

See Response P3-1.

Comment P83 **Preston Wood**

See Response P3-1.

Comment P84 **SANDRA NEEDS**

See Response P3-1.

Comment P85 **Anna-Jane Tabler**

See Response P3-1.

Comment P86 **Frank Halstead**

See Response P3-1.

Comment P87 **Laura Cambonchi**

See Response P3-1.

Comment P88 **Leslie Lipps**

See Response P3-1.

Comment P89 **Jason Chu**

See Response P3-1.

Comment P90 **Logan Andrzejewski**

See Response P3-1.

Comment P91 **Michael Scanlon**

See Response P3-1.

Comment P92 **Lara Fischman**

See Response P3-1.

Comment P93 **Martha Atwell**

See Response P3-1.

Comment P94 **Jason M. Moritz**

See Response P3-1.

Comment P95 **Amber Espinosa-Jones**

See Response P3-1.

Comment P96 **NADIA Taha**

See Response P3-1.

Comment P97 **Lisa Karahalios**

See Response P3-1.

Comment P98 **Nathaniel Heidt**

See Response P3-1.

Comment P99 **Samantha Kelly**

See Response P3-1.

Comment P100 **Joel Freeman**

See Response P3-1.

Comment P101 **Angela Zhou**

See Response P3-1.

Comment P102 **Larry Herr**

See Response P3-1.

Comment P103 **Heather Santora**

See Response P3-1.

Comment P104 **Aaron Cabral**

See Response P3-1.

Comment P105 **Raul Macias**

See Response P3-1.

Comment P106 **Jesse Jimenez**

See Response P3-1.

Comment P107 **Carlos Navarrette**

See Response P3-1.

Comment P108 **Sofia Casias**

See Response P3-1.

Comment P109 **Bz Zhang**

See Response P3-1.

Comment P110 **Suzel Bertrand**

See Response P3-1.

Comment P111 **Carol Cetrone**

See Response P3-1.

Comment P112 **Claire Lamneck**

See Response P3-1.

Comment P113 **Paris Eley**

See Response P3-1.

Comment P114 **Crystal Baranyk**

See Response P3-1.

Comment P115 **Paul Tepper**

See Response P3-1.

Comment P116 **Angie An**

See Response P3-1.

Comment P117 **Neil Wedge**

See Response P3-1.

Comment P118 **Philip Murphy**

See Response P3-1.

Comment P119 **Jessie Her**

See Response P3-1.

Comment P120 **Mary Mallory**

See Response P3-1.

Comment P121 **Jenna Cobb**

See Response P3-1.

Comment P122 **Phyl van Ammers**

Response P122-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. The proposed Project's potential impacts to historic resources, including El Pueblo de Los Angeles and LASHP, are addressed in the Draft LA ART EIR, Section 3.5, Cultural Resources, with supporting data provided in Draft LA ART EIR Appendix G, Historical Resource Technical Report for the Los Angeles Aerial Rapid Transit Project (HRTR). As concluded in Section 3.5 of the Draft LA ART EIR, the proposed Project's potential impacts related to historical resources would be less than significant. The Draft SEIR was limited to the discrete construction noise mitigation issues identified by the Court Opinion. The LA ART EIR's analysis of all other environmental topics was upheld by the Court of Appeal and remains unchanged. The comment does not provide new information that was not known at the time of the LA ART EIR; see Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for a discussion of why there are no project changes, changed, circumstances, or significant new information requiring additional environmental review.*

Response P122-2 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. The proposed Project solely proposes an aerial gondola system and was not improperly segmented or "piecemealed" from a larger development project at the*

Dodger Stadium property because the proposed Project does not include other development, and neither the Project Sponsor nor any other applicant has applied for other development unrelated to the existing stadium uses on the Dodger Stadium property.

Response P122-3 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. See Response P122-2. As discussed in the Draft LA ART EIR, Section 2.0, Project Description, the proposed Project was chosen as it maximizes alignment along the public ROW and publicly owned property and minimizes aerial rights over private properties, taking into account existing and future adjacent land uses. As described throughout the Draft LA ART EIR, the proposed Project would require aerial easements for certain properties along the proposed Project (see Draft LA ART EIR, Sections 2.5 of Section 2, Project Description, and 3.11.1, Figure 6-12 of Section 3.11, Land Use and Planning). How the Project Sponsor acquires the aerial rights for the proposed Project is beyond the scope of the Draft SEIR.*

Response P122-4 *Refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for a discussion of SB 79.*

Response P122-5 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR. Refer to Final LA ART EIR, Topical Response G, No Improper Project Segmentation: The Proposed Project Is Intended to Create a Transit Connection from Metro's Union Station Transportation Hub via an Aerial Gondola System to the Dodger Stadium Property. The comment and the attached 2008 letter to the City Planning Department refer to the "Next 50" Project which was proposed in 2008 by former Los Angeles Dodgers owner Frank McCourt. The Next 50 Project proposed improvements at Dodger Stadium, including a plaza and promenade, a Dodger museum, dining, retail, ticketing enhancements, Dodger offices, an outdoor concourse with landscaping and pedestrian circulation around the Stadium, a landscaped plaza, and parking improvements. The Next 50 Project did not proceed after 2008, and the current owners of the Los Angeles Dodgers purchased the team and Dodger Stadium in 2012. Accordingly, the Next 50 Project is not required to be included as a related project or analyzed as part of the proposed Project. As such, the 2008 letter to the City Planning Department about the Next 50 Project is not responded to in this Final SEIR for the proposed Project.*

Response P122-6 *Refer to Response P22-5 for a discussion of "Next 50", and refer to Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information, for a discussion of why there is no new information that would necessitate additional environmental review under CEQA Guidelines Sections 15088.5 or 15162.*

Comment P123 **Holly Peterson**

See Response P3-1.

Comment P124 **Ben Covette**

See Response P3-1.

Comment P125 **Emily Berry**

See Response P3-1.

Comment P126 **Stephen Johnson**

See Response P3-1.

Comment P127 **Katherine Markova**

See Response P3-1.

Response P127-1 *The change in electric vehicle adoption for light-duty vehicles in the Los Angeles (South Coast Air Basin) area can be observed through California's On-Road Emission Factor Model (EMFAC2021). This model aligns with regulatory standards in place at the time of its development and includes real vehicle population data from sources such as the California Department of Motor Vehicles (DMV). The Draft LA ART EIR air quality analysis estimated on-road construction and operational emissions using EMFAC2021 emission factors. Based on EMFAC2021 data, which is still the current EPA-approved model, the population of fully electric light-duty vehicles in the Los Angeles (South Coast Air Basin) area increased from approximately 1.3% in 2019 to 3.3% in 2024, representing a 2 percentage point increase.*

From 2019 to 2024, the light-duty GHG emission factors from EMFAC2021 decreased due to various factors, including increases in the number of electric and plug-in hybrid vehicles in the light-duty fleet, as well as improvements in the fuel economy of gasoline-fueled and diesel-fueled vehicles. The mobile GHG emissions in the Draft LA ART EIR analysis are driven primarily by the carbon dioxide (CO_2) running exhaust emission factor, which combined with vehicle miles traveled (VMT) drives 98% of the carbon dioxide equivalent (CO_2e) mobile emissions for the Project. Specifically, from 2019 to 2024, EMFAC2021 shows reductions in the range of 7% to 12% in the CO_2 running exhaust emission factors for the light-duty fleet. Similarly, the latest EMFAC2025 model (not yet EPA-approved) shows reductions in the range of 4% to 14% from 2019 to 2024.

If the CO_2 emission factors used in the baseline year analysis were updated to reflect 2024 conditions, where emission factors could be up to 14% lower, the net GHG emissions in the Project buildout years, 2026 and 2042, would remain net negative. This means that even with the advancement in vehicle technology and increased adoption of electric vehicles in the baseline year, the Project's design and operational benefits, centered around renewable energy use and reduced reliance on conventional vehicles, maintain their contribution to overall emission reductions. Thus, the concerns expressed by the comments would not change the *conclusions of the analysis as previously completed and disclosed in the LA ART EIR.*

Furthermore, these changes in the baseline emission assumptions would not impact the Project's satisfaction of Senate Bill (SB) 44 requirements. As discussed in Section 1.4.3 of the Draft LA ART EIR, SB 44 provides for streamlined judicial review for "environmental leadership transit projects," so long as certain requirements are met. One of those conditions is that for projects less than two miles in length (such as this Project), the project must reduce emissions by no less than 50,000 metric tons (MT) of greenhouse gases over the useful life of the project, without using offsets. Even if baseline mobile emissions were reduced by up to 14%, as described above, over an estimated 30-year lifespan (2026-2055), the proposed Project would continue to satisfy this condition of SB 44.

Regarding whether the proposed Project would conflict with any plan, policy, or regulation adopted for the purposes of reducing emissions of greenhouse gases, Appendix C of the Los Angeles Aerial Rapid Transit Greenhouse Gas Emissions Technical Report for the Draft LA ART EIR detailed an evaluation of the Project concerning applicable state greenhouse gas reduction strategies, the 2017 California Air Resources Board (CARB) Scoping Plan, Connect SoCal, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the 2019 Metro Climate Action and Adaptation Plan. Though some of these plans have been updated since the preparation of the Draft LA ART EIR, such as the CARB 2022 Scoping Plan and the 2024-2050 RTP/SCS, the Project remains consistent with these plans since the Project continues to reduce GHG emissions compared to existing conditions in the buildout year (2026) and horizon year (2042), utilizes renewable electricity, and offers an innovative alternative mode of transit that supports statewide and regional GHG emission reduction goals.[3]

Response P127-2 *See Topical Response 4, No Project Changes, Changed Circumstances, or Significant New Information.*

Comment P128 **Daniel Ralston**

See Response P3-1.

Comment P129 **Richard Devletian**

See Response P3-1.

Comment P130 **Casa Wilson**

See Response P3-1.

[3] 2025. Ramboll. Supplemental GHG Memorandum.

Comment P131 **Cassandra Baez**

See Response P3-1.

Comment P132 **Stephanie Scott**

See Response P3-1.

Comment P133 **Julie Rico**

See Response P3-1.

Comment P134 **Manuel Pires**

See Response P3-1.

Comment P135 **Hannah Rose Dexter**

See Response P3-1.

Comment P136 **Francisca Salazar**

See Response P3-1.

Comment P137 **Melissa Martinez**

See Response P3-1.

Comment P138 **Yra Lopez**

See Response P3-1.

Comment P139 **Manuel Martinez**

See Response P3-1.

Comment P140 **Cayla McCrae**

Response P140-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

See Response P3-1.

Comment P141 **Stephanie Aston**

See Response P3-1.

Comment P142 **Bella Gomez**

See Response P3-1.

Comment P143 **Bella Gomez**

See Response P3-1.

Comment P144 **Boris Worister**

See Response P3-1.

Comment P145 **Braden Pontoli**

See Response P3-1.

Comment P146 **Brittany Rochford**

See Response P3-1.

Comment P147 **Heather Lockie**

See Response P3-1.

Comment P148 **Laura Beatty**

Response P148-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

See Response P3-1.

Comment P149 **Liliana Cortez**

See Response P3-1.

Comment P150 **Lydia Barrett**

See Response P3-1.

Comment P151 **Sarah Morgan**

See Response P3-1.

Comment P152 **Marja Kay**

See Response P3-1.

Comment P153 **Nancy Hoven**

Response P153-1 *Refer to Topical Response 3, Construction Noise.*

Comment P154 **Robert Reyes Villagomez**

See Response P3-1.

Comment P155 **Alexandra Formella**

See Response P3-1.

Comment P156 **Ann Dorsey**

See Response P3-1.

Comment P157 **Bz Zhang**

See Response P3-1.

Comment P158 **mahfam@castaneafellowship.org**

See Response P3-1.

Comment P159 **Michael Manning**

See Response P3-1.

Comment P160 **Richard Rojas**

See Response P3-1.

Comment P161 **Annie Chuong**

See Response P3-1.

Comment P162 **ladyenyaj@gmail.com**

See Response P3-1.

Comment P163 **Christine Linh**

See Response P3-1.

Comment P164 **ddl8@yahoo.com**

See Response P3-1.

Comment P165 **sycamorecity@gmail.com**

See Response P3-1.

Comment P166 **Lyn Gaza**

See Response P3-1.

Comment P167 **Sjoerd Oostrik**

See Response P3-1.

Comment P168 **mjang@aapiequityalliance.org**

See Response P3-1.

Comment P169 **Soraya Barabi**

See Response P3-1.

Comment P170 **hello@audreychan.net**

See Response P3-1.

Comment P171 **andreask@usc.edu**

See Response P3-1.

Comment P172 **Ray Corpus**

See Response P3-1.

Comment P173 **Luke Macdonald**

See Response P3-1.

Comment P174 **Heather Lockie**

See Response P3-1.

Comment P175 **Tany Ling**

Response P175-1 *Refer to Topical Response 3, Construction Noise.*

See Response P3-1.

Comment P176 **Chase Puskar**

See Response P3-1.

Comment P177 **Alice L**

See Response P3-1.

Comment P178 **Chase Puskar**

See Response P3-1.

Comment P179 **Angela Anguiano**

See Response P3-1.

Comment P180 **Kristy Chan**

See Response P3-1.

Comment P181 **Justin Mercado**

See Response P3-1.

Comment P182 **Brandon Padilla**

See Response P3-1.

Comment P183 **Julianne Papadopoulos**

See Response P3-1.

Comment P184 **Rebecca Cumberland**

See Response P3-1.

Comment P185 **Ron Frank**

See Response P3-1.

Comment P186 **Jennifer Lazo**

See Response P3-1.

Comment P187 **Sandra Vadhin**

See Response P3-1.

Comment P188 **Anahy Hernandez**

See Response P3-1.

Comment P189 **Caroline Seon**

See Response P3-1.

Comment P190 **Luke Macdonald**

See Response P3-1.

Comment P191 **Sara Wick**

See Response P3-1.

Comment P192 **Phyllis Chiu**

Response P192-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR, and Topical Response 3, Construction Noise.*

See Response P3-1.

Comment P193 **Gabriel Arellano**

See Response P3-1.

Comment P194 **Yahaira Guerrero**

See Response P3-1.

Comment P195 **Suellen Wagner**

See Response P3-1.

Comment P196 **Karina Corbera**

Response P196-1 *Refer to Topical Response 3, Construction Noise, and Topical Response 5, CEQA Process for Draft SEIR.*

Response P196-2 *Refer to Topical Response 3, Construction Noise, and Topical Response 5, CEQA Process for Draft SEIR.*

Response P196-3 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Response P196-4 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

See Response P3-1.

Comment P197 **Joyce Dillard**

See Response P3-1.

Comment P198 **Ron Frank**

Response P198-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Response P198-2 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Response P198-3 *Refer to Topical Response 5, CEQA Process for Draft SEIR.*

Response P198-4 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Response P198-5 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Comment P199 **Andrew Greene**

See Response P3-1.

Comment P200 **Breda Lund**

See Response P3-1.

Comment P201 **Vince Leus**

See Response P3-1.

Comment P202 **Karina Corbera**

Response P202-1 *Refer to Topical Response 5, CEQA Process for Draft SEIR.*

Response P202-2 *Refer to Topical Response 5, CEQA Process for Draft SEIR.*

Response P202-3 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

See Response P3-1.

Comment P203 **Thomas Smith**

Response P203-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Response P203-2 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

Comment P204 **Daniel Bae**

See Response P3-1.

Comment P205 **Michael Ferrero**

Response P205-1 *Refer to Topical Response 1, Comment Is Outside the Scope of the SEIR.*

See Response P3-1.

Comment P206 **Michelle Wang**

See Response P3-1.

Comment P207 **Andy H**

See Response P3-1.

Comment P208 **Maraky Alemseged**

See Response P3-1.

Comment P209 **Selene Medina**

See Response P3-1.

Comment P210 **Juni Wong**

Response P210-1 *Refer to Response GO5-1 through GO5-15.*

Comment P211 **Emilie Hu**

See Response P3-1.

Comment P212 **Rosasela Mora**

See Response P3-1.

Comment P213 **Casey Wong**

See Response P3-1.

Comment P214 **Jamie Gallo**

See Response P3-1.

Comment P215 **Charles Soji Thomas**

See Response P3-1.

Comment P216 **Diana Chang**

See Response P3-1.

Comment P217 **Ding Kong**

See Response P3-1.

Comment P218 **Jennifer Fong**

See Response P3-1.

Comment P219 **Ana Corbera**

See Response P3-1.

Comment P220 **doodleswithoutborders@gmail.com**

See Response P3-1.

Comment P221 **Pars Watson**

See Response P3-1.

Comment P222 **Izak Chu**

See Response P3-1.

Comment P223 **maraky@baji.org**

See Response P3-1.

Comment P224 **Craig Wong**

See Response P3-1.

4.0 Mitigation Monitoring and Reporting Program

4.1 Introduction

CEQA requires a lead agency to adopt a MMRP for projects where mitigation measures are a condition of their approval and development. The Draft EIR (2022), Final EIR (2024), and Errata (2024) comprise the LA ART EIR for the proposed Project. The Draft and Final SEIR were prepared in accordance with CEQA to respond to the Court Opinion's direction regarding the adequacy of the construction noise mitigation analysis in the LA ART EIR and consultation with SMMC as a trustee agency.

The LA ART EIR, Draft SEIR, and Final SEIR analyze the potential environmental impacts of the proposed Project and identify project design features (PDFs) that are incorporated into the Project, as well as mitigation measures (MMs) recommended, where applicable, to address potentially significant environmental impacts. As the lead agency for the proposed Project, Metro is responsible for administering and implementing the MMRP, which has been prepared in compliance with CEQA, including Public Resources Code Section 21081.6 and CEQA Guidelines Section 15097. The decisionmakers must define specific monitoring and reporting requirements to be enforced during implementation of the proposed Project. The primary purpose of the MMRP is to monitor the implementation of the PDFs and MMs identified in the LA ART EIR, Draft SEIR, and Final SEIR.

4.2 Organization

As shown in **Table 4-1, Mitigation Monitoring and Reporting Program**, below, each identified PDF and MM for the Project is listed and categorized by environmental impact area, with accompanying discussion of the following:

- **Responsible Party:** The entity accountable for the action.
- **Monitoring Agency:** The agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Enforcement Agency:** The agency or agencies with the power to enforce the project design feature or mitigation measure.
- **Monitoring Phase:** The phase of the Project during which the project design feature or mitigation measure shall be monitored.
- **Monitoring Frequency:** The frequency at which the project design feature or mitigation measure shall be monitored.
- **Action(s) Indicating Compliance:** The action(s) of which the Enforcement or Monitoring Agency indicates that compliance with the identified project design feature or required mitigation measure has been implemented.

4.3 Program Modification

After review and approval of the final MMRP by the Lead Agency, minor changes and modifications to the MMRP are permitted, but can only be made subject to Metro approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMRP and the need to protect the environment. No changes will be permitted unless the MMRP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The proposed Project shall be in substantial conformance with the PDFs and MMs contained in this MMRP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMRP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project-related approval, finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not in and of itself require a modification to any proposed Project discretionary approval unless the Director of Planning for Metro as the Lead Agency also finds that the change to the PDF or MM results in a substantial change to the proposed Project or the non-environmental conditions of approval.

Table 4-1: Mitigation Monitoring and Reporting Program

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
Aesthetics					
AES-PDF-A: Project Lighting. The Project would also include the following Project Design Features related to lighting: • Building Lighting will not exceed 60 watts. • Building Lighting outdoor luminaires will not exceed 6200 initial lumens. • Sign Lighting luminance will not exceed 10,000 candelas per m2 (cd/m2) during the day from after sunrise until 45 minutes prior to sunset. Sign Lighting will not exceed 300 cd/m2 at night from sunset until 45 minutes prior to sunrise. • Sign Lighting luminance shall transition smoothly from daytime luminance to nighttime luminance and vice versa. • Illuminated signs that have the potential to exceed 300 cd/m2 will include an electronic control mechanism to reduce sign luminance to 300 cd/m2 at any time when ambient sunlight is less than 100 footcandles (fc).	Project Sponsor Lighting Professional	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Compliance Certificate by Lighting Professional Issuance of Certificate of Occupancy
Air Quality					
AIR-PDF-A: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, the Tier 4 emission standards for nonroad diesel engines promulgated by the USEPA.	Project Sponsor Construction Contractor	Metro and/or the City of Los Angeles and South Coast Air Quality Management District	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Inclusion of requirement in Construction Plan Submittal of Compliance Report
Biological Resources					
BIO-PDF-A: The Project will establish a Tree Protection Zone to protect trees during construction to establish and maintain a healthy environment for all retained trees during the course of construction. The Tree Protection Zone will apply to any trees within the construction footprint, or any trees where a portion of their drip line overhangs the construction footprint (i.e., the trunk of a tree may be outside of the construction footprint, but the tree's drip line overhangs the construction footprint). The Tree	Project Sponsor Arborist or Landscape Contractor Construction Contractor	Metro and/or the City of Los Angeles (Department of Public Works Urban Forestry) and/or State Department of Parks and Recreation	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Inclusion of requirement in Construction Plan Submittal of Compliance Report

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
Protection Zone generally encompasses an area within the drip line of the tree plus an additional 5 feet, depending on the species and size of the tree. Any construction activities within the Tree Protection Zone should follow the following guidelines for root protection. For utilities, any required trenching should be routed in such a manner as to minimize root damage. In areas where the grade around the Tree Protection Zone will be lowered, some root cutting may be unavoidable. Cuts should be clean and made at right angles to the roots. When practical, roots will be cut back to a branching lateral root to avoid root damage.					
BIO-PDF-B: **Avian Collision Mitigation, Monitoring, and Adaptive Management Plan**. The Project Sponsor, in coordination with and subject to the approval of CDFW, shall develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan shall include the following components: 1. Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or mortalities detected in the Project area during routine maintenance activities. 2. An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species. 3. Annual reporting criteria and requirements.	Project Sponsor Qualified Biologist	Metro and/or California Department of Fish and Wildlife	Prior to Certificate of Occupancy (Submittal of Plan) Operations, first 5 years (Annual Monitoring)	Once, prior to Certificate of Occupancy (Submittal of Plan) Annually, for first 5 years	Submittal of Avian Collision Mitigation, Monitoring, and Adaptive Management Plan Annual Reporting, for first 5 years
BIO-PDF-C: **Cabin Window Features**. The cabin windows shall be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces.	Project Sponsor Qualified Biologist	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Compliance Certificate by Qualified Biologist Issuance of Certificate of Occupancy

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
BIO-PDF-D: The proposed Project shall avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides.	Project Operator Pest Control Service Provider	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Inclusion of requirement in Pest Control Service Agreement Issuance of Certificate of Occupancy
BIO-PDF-E: **Tree Disease Management**. Trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases, including but not limited to: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using the best available management practices relevant for each tree disease observed. Any agreement between the proposed Project and a tree removal contractor would include the provisions for tree disease management.	Project Sponsor Arborist or Landscape Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction (Tree Removal)	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction (Tree Removal)	Inclusion of requirement in Construction Plan Issuance of Applicable Building Permit Compliance Certificate by Arborist or Landscape Contractor Submittal of Compliance Report

BIO-PDF-F: The proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including the following replacement ratios for trees:
• City of Los Angeles:
  ○ “Protected” Trees: 4:1
  ○ Non-protected, but “significant” trees, i.e., where the trunk is > 8 inches at 4.5 feet DBH: 1:1
  ○ “Street trees” in the public ROW: as specified by Urban Forestry Division (typically 2:1)
• California Department of Parks and Recreation: At least 1:1
• Caltrans: Large trees, where the trunk is > 8 inches at 4.5 feet DBH: 1:1
	Project Sponsor
	Arborist or Landscape Contractor
		Metro and/or the City of Los Angeles and/or Department of California Parks and Recreation and/or Caltrans	Prior to Certificate of Occupancy	Once, prior to Certificate of Occupancy	Compliance Certificate by Arborist or Landscape Contractor
					Issuance of Certificate of Occupancy

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
BIO-PDF-G: Tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).	Project Sponsor Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction (Tree Removal)	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction (Tree Removal)	Inclusion of requirement in Construction Plan Issuance of Applicable Building Permit Submittal of Compliance Report
BIO-PDF-H: Any fencing used during and after the proposed Project's construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trash cans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.	Project Sponsor Qualified Biologist Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Compliance Certificate by Qualified Biologist Issuance of Applicable Building Permit Inclusion of requirement in Construction Plan Submittal of Compliance Report
MM-BIO-A: *Avoid and minimize project related impacts to special-status and/or roosting bat species*. During the maternity season (April 15 through August 31) prior to construction, a field survey shall be conducted by a qualified biologist to determine the potential presence of colonial bat roosts within 100 feet of the Alameda Station and Dodger Stadium Station footprints and SR-110 overpass over Stadium Way (near Stadium Tower), because these locations provide potentially suitable habitat. A visual	Project Sponsor Qualified Biologist Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Pre-Construction Field Survey by Qualified Biologist Compliance Certificate and Report by Qualified Biologist Inclusion of requirement in Construction Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
inspection and/or one-night emergence survey of trees to be removed near the Alameda Station and Dodger Stadium Station and of the overpass shall be completed using acoustic recognition technology to determine if any maternity roosts are present. To avoid any impacts on roosting bats resulting from construction activities for Stadium Tower, the following shall be implemented: <u>At the SR-110 Overpass</u> Should an active maternity roost be found at the SR-110 overpass, a determination (in coordination with a qualified bat biologist) shall be made whether indirect effects of construction-related activities (i.e., noise and vibration) could substantially disturb roosting bats, and if exclusionary devices should be used to remove bats. This determination shall be based on baseline noise/vibration levels, anticipated noise levels associated with construction of the Stadium Tower, and the sensitivity to noise-disturbances of the bat species present. If it is determined that noise could result in the temporary abandonment of a maternity roost, construction-related activities shall be scheduled to avoid the maternity season (April 15 through August 31), or as determined by the biologist. To avoid any impacts on roosting bats resulting from construction activities at Alameda Station and Dodger Stadium Station, the following shall be implemented: <u>Trees</u> All trees to be removed as part of the Project at the Alameda Station, Stadium Tower, and Dodger Stadium Station sites should be evaluated for their potential to support bat roosts. In particular, any palm and eucalyptus trees that bats are known to use should be evaluated by a qualified biologist by conducting a one-night emergence survey during acceptable weather conditions; or if conditions permit, physically examine the trees for presence or absence of bats (such as with lift equipment) before the start of construction/tree removal. Palm trees are present at the Alameda Station site along Alameda Street and eucalyptus trees					Issuance of Applicable Building Permit Submittal of Compliance Report

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
are present at the Dodger Stadium Station site. The following measures would apply to trees to be removed that are determined to provide potential bat roost habitat by a qualified biologist. • If roosting bats are determined present during the maternity season (April 15 through August 31), the tree shall be avoided until after the maternity season, when <u>the</u> young are self-sufficient. If roosting bats are determined present during the winter months when bats are in torpor, a state in which the bats have significantly lowered their physiological state, such as body temperature and metabolic rate, due to lowered food availability (October 31 through February 15, but is dependent on specific weather conditions), a qualified bat biologist shall physically examine the roost if conditions permit for presence or absence of bats (such as with lift equipment) before the start of construction. If the roost is determined to be occupied during this time, the tree shall be avoided until after the winter season when bats are once again active. • Trees with potential colonial bat habitat can be removed outside of the maternity season and winter season (February 16 through April 14 and August 16 through October 30, or as determined by a qualified biologist) using a two-step tree trimming process that occurs over 2 consecutive days. ○ Day 1, Step 1: Under the supervision of a qualified bat biologist, tree branches and limbs with no cavities shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree will either abandon the roost immediately, or, after emergence, will avoid returning to the roost. ○ Day 2, Step 2: Removal of the remainder of the tree under the supervision of a qualified bat biologist may occur on the following day. Trees that are only to be trimmed and not removed would be processed in the same manner; if a					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
branch with a potential roost must be removed, all surrounding branches would be trimmed on Day 1 under supervision of a qualified bat biologist, and then the limb with the potential roost would be removed on Day 2. • Trees with foliage (and without colonial bat roost potential), such as sycamores, that can support lasiurine bats, shall have the two-step tree trimming process occur over one day under the supervision of a qualified bat biologist. Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. Step 2 would be to remove the remainder of the tree on that same day. For palm trees that can support western yellow bat (a special-status bat species documented in the BSA with the potential to occur in the Project area), the two-step tree process shall be used over two days. Western yellow bats may move deeper within the dead fronds during disturbance. The two-day process will allow the bats to vacate the tree before removal. • The results of bat surveys, evaluations, and monitoring efforts that are undertaken shall be documented in a report by the qualified biologist at the conclusion of all bat-related activities.					
MM-BIO-B: *Avoid and minimize project-related impacts to nesting birds.* To avoid impacts to nesting birds protected under the MBTA and CFGC resulting from construction activities that may occur during the nesting season, the following mitigation measure shall be implemented: • Construction activities, including the clearance of trees potentially suitable for nesting birds, shall occur outside of the nesting season (generally February 1 through September 30). If construction activities must occur within this time period, the following measures shall be employed: ○ A pre-construction nesting survey shall be conducted by a qualified biologist within 3 days (72 hours) prior to the start of construction	Project Sponsor Qualified Biologist Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Pre-Construction Field Survey by Qualified Biologist Compliance Certificate and Report by Qualified Biologist Inclusion of requirement in Construction Plan Issuance of Applicable Building Permit

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
activities to determine whether active nests are present within 500 feet of the construction zone. All nests found shall be recorded. ○ A minimum 300-foot no-work buffer shall be established around any active passerine bird nest. A minimum 500-foot no-work buffer shall be established around any active raptor nest. The qualified biologist shall monitor the nest on a weekly basis, and construction activities within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor shall be postponed until the biologist determines that the nest is no longer active. However, the standard 300- to 500-foot no-disturbance buffer distance may be adjusted (including increases or reductions to the buffer) by a qualified biologist on a case-by-case basis, taking into consideration the location, type, duration and timing, and severity of work, distance of nest from work area, surrounding vegetation and line-of-sight between the nest and work areas (also taking into account existing ambient conditions from human activity within the line of sight), the influence of other environmental factors, and species' site-specific level of habituation to the disturbance. If the qualified biologist determines nesting activities may fail as a result of work activities, the biologist shall immediately inform the construction manager, and all Project work shall cease (except access along established roadways) within the recommended no-disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site. ○ Buffers will be delineated on-site with bright flagging for easy identification by project staff. The on-site construction supervisor and operator staff will be notified of the nest and the buffer limits, and instructed of the sensitivity of the area to ensure the buffer is maintained.					Submittal of Compliance Report

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
○ A summary of preconstruction surveys and methodologies employed, monitoring efforts, and any no-disturbance buffers that were installed shall be documented in a report by the qualified biologist at the conclusion of each nesting season.					
Cultural Resources					
CUL-PDF-A: Pre-Construction Documentation of The Winery. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for The Winery, per the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. The report will: 1. Be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for history, architectural history, or historic architecture with demonstrated experience in preparing HABS documentation. 2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following: a. The full northern elevation (facing Cesar E. Chavez Avenue) and i. The roofline, foundation, and any door, window, or walkway openings, ii. Detail views showing the typical existing condition of the exterior wall, and iii. Detail views showing any existing damage to the exterior such as cracks or spalling. b. West elevation (facing Olvera Street), and i. The roofline, foundation, and any door, window, or walkway openings, and ii. Detail views showing the typical existing condition of the exterior brick wall, and	Project Sponsor Historic Preservation Professional	Metro and/or the City of Los Angeles (City of Los Angeles Office of Historic Resources)	Pre-Construction	Once, prior to Issuance of Applicable Building Permits for the Alameda Station (proof of compliance)	Pre-Construction Documentation by Historic Preservation Professional Issuance of Applicable Building Permits for the Alameda Station

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar. c. East elevation (facing Alameda Street) i. The roofline and foundation, and ii. Detail views showing the typical existing condition of the exterior brick wall, and iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar. 3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage will be keyed to a sketch of the elevation indicating its location. 4. Include copies of historic photographs and other supporting documentation, if available. 5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need to only be distributed to repositories that express interest. a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. b. El Pueblo de Los Angeles Historical Monument Authority - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. c. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs.					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
CUL-PDF-B: Post-Construction Documentation of The Winery. Post-Construction: After construction is complete, pictures of The Winery equivalent to CUL-PDF-A will be taken to objectively compare the condition of The Winery before and after construction. In the event that damage to the Winery not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68).	Project Sponsor Historic Preservation Professional	Metro and/or the City of Los Angeles (City of Los Angeles Office of Historic Resources)	Post-Construction	Once, Post-Construction of the Alameda Station Once, if Repairs Required, Post-Repairs	Post-Construction Documentation by Historic Preservation Professional If Repairs Required, Repairs within 12 Months; Completion of Repairs shall not Delay Issuance of Certificate of Occupancy
CUL-PDF-C: Pre-Construction Documentation. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for the *El Grito* mural, per the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. The report will: 1. Be prepared by a historic preservation professional meeting the Secretary of the Interior's Professional Qualifications Standards for history, architectural history, or historic architecture with demonstrated experience in preparing HABS documentation. 2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following: a. The entirety of the *El Grito* mural from edge to edge, looking straight on b. The left half of the *El Grito* mural looking straight on c. The right half of the *El Grito* mural looking straight on d. Oblique views illustrating the curvature of the wall	Project Sponsor Historic Preservation Professional	Metro and/or the City of Los Angeles (City of Los Angeles Office of Historic Resources)	Pre-Construction	Once, prior to Issuance of Building Permits for the Alameda Station (proof of compliance)	Pre-Construction Documentation by Historic Preservation Professional Issuance of Building Permits for the Alameda Station

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
e. Sequential photographs showing the various panels and subjects in greater detail f. The back and sides of the curved wall on which the *El Grito* mural is located, and g. Detail views showing: i. Typical profile view of the *El Grito* mural (e.g., showing the depth of the tiles on the substrate) ii. Notch shapes at the top two corners (two views, left and right) iii. Curved shape of the sides of the *El Grito* mural (two views, left and right side) iv. Typical grout between tiles in two or more locations, v. Bottom edge where the *El Grito* mural meets the plaza floor vi. Any existing damage or deterioration prior to construction 3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage should be keyed to a sketch of mural indicating its location. 4. Include copies of historic photographs and other supporting documentation, if available. 5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need to be distributed to only repositories that express interest. a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. b. UC Santa Cruz Library - One hard copy and/or digital file (dependent on repository					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
preference) of the descriptive data, index to photographs, photo key plan, and photographs. c. Los Angeles Department of Cultural Affairs (DCA) - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. d. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. e. Mural Conservancy of Los Angeles - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs. f. Museo Eduardo Carillo - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs.					
CUL-PDF-D: Protection During Adjacent Construction. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will ensure that the *El Grito* mural is sufficiently protected from any inadvertent damage caused by construction activities. Following National Park Service guidance for protecting historical resources during nearby construction, the following measures, at a minimum, should be implemented: 1. Vibration monitoring equipment (VIB-A) should be carefully installed so that it does not permanently damage the face of the *El Grito* mural. 2. The *El Grito* mural should be cushioned and buttressed from either side of the wall with padded wood supports. The padding may consist of insulating foam or similar material. 3. A protective barrier or barriers made from plywood should be installed over the front, back, top, and sides of the *El Grito* mural and curved wall to diffuse the force of any potential physical contact. The barrier should include removable	Project Sponsor Historic Preservation Professional Construction Contractor	Metro and/or the City of Los Angeles (City of Los Angeles Office of Historic Resources)	Pre-Construction Construction	Once, prior to Issuance of Applicable Building Permits for the Alameda Station (proof of compliance) Periodic Field Inspections during Construction	Documentation by Historic Preservation Professional Issuance of Building Permits for the Alameda Station

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
panels or a similar feature to ensure the vibration monitors and mural can be visually inspected during construction monitoring (CUL-PDF-C). 4. Plastic tarp or polyethylene sheeting should be secured over the wood barriers to protect against the accumulation of dust or contact with materials such as uncured concrete or other liquids that could damage or mark the surface of the *El Grito* mural. All of the protective measures described above should be installed and secured in such a way that does not damage the *El Grito* mural or the wall on which it is located. The barrier will not be physically attached to the *El Grito* mural or wall with screws, nails, or other fasteners.					
CUL-PDF-E: Construction Monitoring Plan (Built Resources). Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare a Construction Monitoring Plan in coordination with the DCA. The Construction Monitoring Plan will identify specific project milestones at which a qualified professional meeting the Secretary of the Interior's Standards for architectural history or historic architecture will be notified by the Project Sponsor or Project Sponsor's contractor to visit the site and observe and document the *El Grito* mural's condition. Details will be recorded in construction monitoring memorandums submitted to DCA. These milestones will include, at a minimum: 1. Pre-Construction: Before protection measures are installed (CUL-PDF-D), to confirm the baseline condition of the *El Grito* mural is still consistent with the information presented in the HABS-like documentation (CUL-PDF-C). 2. Pre-Construction: Once protection measures (CUL-PDF-D) are installed, to ensure they are sufficient, and their installation has not damaged the *El Grito* mural. 3. Construction: After each phase of active construction.	Project Sponsor Historic Preservation Professional Construction Contractor	Metro and/or the City of Los Angeles (City of Los Angeles Office of Historic Resources)	Pre-Construction Construction Post-Construction	Once, Pre-Construction of the Alameda Station Periodic Field Inspections during Construction (after each phase of construction) Once, Post-Construction Once, if Repairs Required, Post-Repairs	Construction Monitoring Plan and other Documentation by Historic Preservation Professional If Repairs Required, Repairs within 12 Months; Completion of Repairs shall not Delay Issuance of Certificate of Occupancy

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
4. Post-Construction: After construction is complete and protective measures have been removed. At this stage, pictures of the *El Grito* mural equivalent to CUL-PDF-C will be taken to objectively compare the condition of the *El Grito* mural before and after construction. The Construction Monitor will also be included on notifications from the real-time vibration monitoring equipment (VIB-A). In the event that damage to the *El Grito* mural not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the Project. Repairs will conform to the Secretary of Interior's Standards for the Treatment of Historic Properties 36 CFR Part 68.					
MM-CUL-A: Cultural Resources Monitoring and Mitigation Plan. A Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared for the Project by a qualified archaeologist meeting the Secretary of Interior Standards for Archaeology (36 CFR § 61) prior to construction. Where specific Project components, such as the Chinatown/State Park Station, have requirements specific to that component, the CRMMP will lay out regulatory requirements (such as PRC § 5024) which will be adhered to. This includes SHPO consultation and following practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible. The same would be for any specific requirement from El Pueblo de Los Angeles specific to the work at the Alameda Station. The General Plan acknowledges the Park has archaeological sensitivities and, as such, recommends continued study of existing and potential resources as well as the need to constantly update and expand the knowledge of historic activities at the Park. As for the cultural resources associated with the Park, the General Plan states that the Park should "[i]dentify, document, evaluate, and interpret cultural resources	Project Sponsor Qualified Archaeologist Construction Contractor	Metro and/or the City of Los Angeles and/or the California Department of Parks and Recreation	Pre-Construction Construction Post-Construction	Once, Prior to Construction Periodic Field Inspections During Construction as Determined by the Qualified Archaeologist Once Post-Construction Once, if There Is a Discovery that Proves Significant	Cultural Resources Monitoring and Mitigation Plan (CRMMP) by Qualified Archaeologist If There Is a Discovery That Proves Significant, Curation of Specimens and a Repository Submittal Report within a Year of Completion of Fieldwork; Final Report Filed with the SCCIC

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
at the Park," and "[p]rotect, stabilize, and preserve significant cultural resources within the Park." Specifically, the CRMMP shall be applicable to all ground-disturbance activities extending into native soil within known archaeological sites and other areas of high sensitivity. Excavations within a specified radius of known archaeological sites shall be monitored up to a depth at which the qualified archaeologist determines the base of the archaeological deposit has been reached. The qualified archaeologist shall supervise the archaeological monitor. Monitoring is expected to be required to the maximum depth of planned excavations at the Alameda Station and up to approximately 15 feet in depth at the Alameda Tower and the Chinatown/State Park Station. Work will also be monitored by Native American monitors in accordance with Mitigation Measure TCR-A. However, if in the course of excavations the qualified archaeologist determines that the site is disturbed or the sensitivity for significant archaeological resources is low because no resources have been encountered, then monitoring may be reduced or suspended. The monitoring plan shall define pre-construction coordination, construction monitoring for the excavations based on activities and depth of disturbance planned for each Project component (including ground-disturbing activities in native soil within known archaeological sites), unanticipated discovery protocols, data recovery (including halting or diverting construction so that archaeological resources can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement (including a curation plan), and reporting. The Project Sponsor shall coordinate with the archaeologist and Metro to develop an appropriate treatment plan for the resources in accordance with California Public Resources Code (PRC) Section 21083.2(i) if they are determined by Metro to be potentially eligible for the CRHR or potentially qualify as unique archaeological resources pursuant to CEQA. Preservation in place is the					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
preferred method of treatment, but if preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource. Key staff shall be identified, and the process of notification and consultation (where entities specific to each station would be identified) shall be specified within the CRMMP as well as protocols for reporting. If the discovery proves significant under CEQA and data recovery is the selected means of treatment, the archaeologist shall also be required to curate specimens in a repository with permanent retrievable storage and submit a written report to the lead agency within a year of completion of the fieldwork. Once complete, the final report shall be filed with the SCCIC. For Resource 19-004200 and the granite paving (within the Area of Direct Impact of the Project) at Site 19-003120, the CRMMP shall describe the required documentation and treatment of the resources during excavation and potential removal.					
MM-CUL-B: Archaeological Resources Worker Training Program. To mitigate unknown historical resources within the Area of Direct Impacts and mitigate potential impacts to them, a qualified archaeologist shall be hired by the Project Sponsor to develop and conduct a worker training program for the Project with input from El Pueblo (as it pertains to the Alameda Station) and Los Angeles State Historic Park staff (as it pertains to the Chinatown/State Park Station) prior to the start of ground-disturbing activities. The training shall be prepared by an archaeologist who meets the Secretary of the Interior's Standards for Archaeology and will be adjusted to the specific details at the two parks. The training shall provide information to construction workers about the known locations of archaeological resources and potential areas that may be sensitive for archaeological resources associated with the Project. Participation in the training by Los Angeles State Historic Park and El Pueblo staff, will be encouraged. In the event construction crews are	Project Sponsor Qualified Archaeologist Construction Contractor	Metro and/or the City of Los Angeles and/or California Department of Parks and Recreation	Pre-Construction Construction	Once, Pre-Construction Periodic Field Inspections during Construction	Archaeological Resources Worker Training Program by Qualified Archaeologist Inclusion of requirement in Construction Plan Training Submittal of Compliance Report

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
phased or rotated, additional training shall be conducted for the new construction workers conducting ground-disturbing activities. The qualified archaeologist shall retain documentation demonstrating that the appropriate construction workers attended the worker training program. An appropriate presentation shall be prepared by a qualified archaeologist which shall describe and illustrate resources likely to be encountered by Project excavation and outline the protocol to be followed in the event of a find. If any archaeological resources are encountered during ground-disturbing activities, work shall be temporarily halted in the vicinity of the find, and the Construction Contractor shall contact the qualified archaeologist to examine and evaluate the resource in accordance with the provisions of CEQA as outlined by the CRMMP.					
MM-CUL-C: Archaeological Testing Plan for 19-000887 and 19-004320 (Alameda Station). To mitigate impacts to Resources 19-000887 and 19-004320, both of which include portions of the Zanja, an NRHP-eligible archaeological site, and where avoidance is not feasible, an archaeological testing plan and data recovery plan for the Area of Direct Impacts, which is located north of the Placita de Dolores, shall be prepared prior to ground-disturbing activities and implemented after the paving is removed. Although the proposed Project is designed to not impact the portion of the Zanja Madre within 19-000887, there is the potential to encounter either previously unrecorded portions of the Zanja or artifact refuse from the overall site. Therefore, a testing plan shall be prepared for the portions of the sites that will be impacted outside of the known Zanja location. Within the Project Area of Direct Impacts, 19-000887 overlaps unevaluated 19-004320 which will, therefore, also be included in the testing plan. The testing plan shall be prepared in consultation with El Pueblo de Los Angeles Historical Monument Authority specific to these resources at the Alameda Station.	Project Sponsor Qualified Archaeologist Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Pre-Construction and as Determined by Archaeological Testing Plan and/or Data Recovery Plan (proof of compliance)	Archaeological Testing Plan If Significant Archaeological Remains Are Discovered, Data Recovery Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts and contain maps showing the overlap of the sites with the project Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery. The testing plan shall be implemented once the paving has been removed and far enough in advance of construction for there to be sufficient time to carry out the plan and to prepare a plan for and conduct a data recovery program if needed. If significant archaeological remains are encountered that appear to contribute to the significance of the overall site during the test excavations and avoidance/preservation in place is not feasible, data recovery excavations will be required, and a data recovery plan shall be prepared and implemented. The data recovery plan shall detail the treatment of the surviving archaeological remains, if testing identifies any. The data recovery plan will specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.					
MM-CUL-D: Archaeological Testing Plan for LAUS Forecourt. To mitigate impacts to Resource 19-001575, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify	Project Sponsor Qualified Archaeologist Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Pre-Construction and as Determined by Archaeological Testing Plan and/or Data Recovery Plan (proof of compliance)	Archaeological Testing Plan If Significant Archaeological Remains Are Discovered, Data Recovery Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria threshold that would require data recovery. If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/preservation in place is not feasible, data recovery excavations will be required, and the data recovery plan shall be implemented. The data recovery plan shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.					
MM-CUL-E: **Archaeological Testing Plan for Los Angeles State Historic Park.** To mitigate unavoidable impacts to Resource 19-003120, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall be prepared in consultation with California State Parks and SHPO (per PRC § 5024.5). The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project; and will specifically be used to confirm and define potential foundations for the Southern Pacific Railroad office/freight house that are shown in Sanborn fire insurance maps to overlap the Area of Direct Impacts for the station. The plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not	Project Sponsor Qualified Archaeologist Construction Contractor	Metro and/or the City of Los Angeles and/or California Department of Parks and Recreation	Pre-Construction Construction	Once, Pre-Construction and as Determined by Archaeological Testing Plan and/or Data Recovery Plan (proof of compliance)	Archaeological Testing Plan If Significant Archaeological Remains Are Discovered, Data Recovery Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
be used, screen sizes, and the criteria thresholds that would require data recovery. If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/ preservation-in-place is not possible, data recovery excavations will be required, and the data recovery plan shall be implemented. The plan shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.					
MM-CUL-F: Redesign of Placement of Park Amenity Structures to Avoid Archaeological Features at Los Angeles State Historic Park Station. After implementation of CUL-E, if it is found that the Los Angeles State Historic Park amenities (e.g., concessions and restroom) at the Los Angeles State Historic Park have the potential to impact any significant features found during the testing phase of CUL-E, the location of the Los Angeles State Historic Park amenity structures will be reconfigured to avoid and/or diminish impacts to those features as feasible.	Project Sponsor Qualified Archaeologist Construction Contractor	Metro and/or the California Department of Parks and Recreation	Pre-Construction	Once, Pre-Construction	If Necessary, Reconfiguration of Locations of Los Angeles State Historic Park Amenity Structures
Geology and Soils					
MM-GEO-A: Prepare a Site-Specific Final Geotechnical Report: The Project Sponsor shall engage a California-registered geotechnical engineer to prepare and submit a site specific- final geotechnical investigation and report to the City of Los Angeles for review, consistent with the requirements of the CBC, applicable Los Angeles amendments, and California Geological Survey Special Publication 117 (as amended). A site-specific geotechnical exploration program, along with associated laboratory testing, is necessary to complete a design-level evaluation of the geologic hazards and conditions, seismic hazards, grading conditions, and foundation capacities. The site-specific final geotechnical report shall provide a	Project Sponsor Geotechnical Engineer	Metro and/or the City of Los Angeles (Los Angeles Department of Building and Safety)	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Approval of the Site-Specific Final Geotechnical Report by Geotechnical Engineer by the City of Los Angeles (Department of Building and Safety) Issuance of Applicable Building Permit(s)

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
description of the geological and geotechnical conditions at the site; the findings, conclusions, and mitigation recommendations for potential geologic and seismic hazards; and design-level geotechnical recommendations in support of grading and foundation design. Additionally, the geotechnical report shall include recommended measures to reduce potential impacts related to landslides, subsidence, liquefaction, differential settlement, expansive soils, soil corrosivity, or other potential ground failures induced by the proposed Project. The submittal and approval of the final geotechnical report shall be a condition of the grading and construction permits issued by the City of Los Angeles Department of Building and Safety. The Project Sponsor shall implement the recommendations contained in the approved report during project design and construction.					Issuance of Certificate of Occupancy
MM-GEO-B: Prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP): A PRMMP shall be developed by a qualified paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The plan shall apply to paleontologically sensitive deposits, including older Quaternary alluvium and Puente formation deposits, that may be impacted by the proposed Project, as determined by a qualified paleontologist in consultation with the construction team and guided by geotechnical coring. The qualified paleontologist shall supervise the paleontological monitor, who shall be present during construction excavations into older Quaternary alluvial deposits and Miocene Puente formation deposits. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains, and where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the paleontologist, and shall be based on the rate of ground-disturbing activities, the material being excavated, and the depth of excavation; and if found, the abundance and type of paleontological materials.	Project Sponsor Qualified Paleontologist Construction Contractor	Metro and/or City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) To Be Determined in Consultation with Qualified Paleontologist	Monitoring and Mitigation Plan (PRMMP) by Qualified Paleontologist In the Event that Paleontological Materials are Found, Report Prepared and Submitted to the Los Angeles County Natural History Museum within 1 Year of Completion of Fieldwork

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
If any paleontological materials are found, the paleontological monitor shall temporarily divert or redirect ground-disturbing activities in the area of the exposed fossil to facilitate evaluation, and if necessary, salvage. The paleontologist shall assess the discovered material(s) and provide a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, as appropriate. The Project Sponsor shall comply with the recommendations of the evaluating paleontologist, and ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the paleontologist's satisfaction. If paleontological materials are found, the paleontologist shall prepare a report identifying the resource and the recommendations proposed and implemented, within 1 year of completion of the fieldwork. A copy of the report shall be submitted to the Los Angeles County Natural History Museum.					
Greenhouse Gas Emissions					
GHG-PDF-A: Green Power. Electrical power for the operation of the proposed Project's aerial gondola system and associated stations, junction, and towers would come from renewable resources. The proposed Project shall achieve this through applying to LADWP's Green Power Program or other available LADWP (or equivalent) programs that provide renewable electricity.	Project Operator	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Compliance Certificate Issuance of Certificate of Occupancy
Hazards and Hazardous Materials					
MM-HAZ-A: Prepare a Soil and Groundwater Management Plan: The Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities. The Soil and Groundwater Management Plan would be prepared and implemented to specify methods for handling and disposal in the event contaminated groundwater, contaminated soil, or structures, are encountered during project construction. The Soil and Groundwater Management Plan shall provide a	Project Sponsor Qualified Environmental Consultant Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Building and Safety)	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Approval of Soil and Groundwater Management Plan by Qualified Environmental Consultant by the City of Los Angeles (Department of Building and Safety)

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater in order to classify them as either hazardous or non-hazardous, and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. Methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations and be protective of workers and the environment. This Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). Contract specifications shall mandate full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.					Issuance of Building Permits Compliance Certificate Issuance of Certificate of Occupancy
MM-HAZ-B: Hazardous Materials Abatement: Prior to demolition of the existing building at 1201 North Broadway, a licensed abatement contractor will conduct hazardous materials abatement, which would remove, dispose of, and transport hazardous materials in accordance with federal, state, and local regulations. The licensed abatement contractor would be required to comply with Cal/OSHA regulations governing asbestos standards and lead paint standards (California Code of	Project Sponsor Licensed Abatement Contractor Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction (prior to Demolition of 1201 North Broadway)	Once, Plan Check Periodic Field Inspections during Pre-Construction (prior to Demolition of 1201 North Broadway)	Compliance Certificate by Licensed Abatement Contractor Issuance of Applicable Demolition Permit for 1201 North Broadway

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
Regulations Article 4 Sections 1529, 5208, and 1532), OSHA 29 Code of Federal Regulations 1926.62 regarding lead in construction, and OSHA 29 Code of Federal Regulations 1926.1101 regarding asbestos exposure. The contractor would also be required to comply with SCAQMD Rule 1403, related to asbestos emissions during building demolition activities. Safe work measures would be taken during the hazardous materials abatement, including wetting the area to prevent possible release of hazardous materials into the air and removing dust with high-efficiency particulate air vacuums and/or disposable wet wipe towels.					
Land Use and Planning					
MM-LUP-A: Obtain a Los Angeles State Historic Park General Plan Amendment. Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan.	Project Sponsor	Metro and/or California Department of Parks and Recreation	California Department of Parks and Recreation Approval Process	Once, at the Conclusion of the California Department of Parks and Recreation Approval Process	Approval of the Los Angeles State Historic Park General Plan Amendment
Noise					
NOI-PDF-A: Gondola Cabin Noise Control Features. The Project's gondola cabins shall include the following features: • Gondola cabins shall be designed with an interior-to-exterior noise reduction rating of no less than Sound Transmission Class (STC) 35. • If heating, ventilation, and air conditioning (HVAC) units are included in the gondola cabin design, they shall be designed with a sound power level of no more than 71 dBA.	Project Sponsor Gondola Cabin Manufacturer	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Compliance Certificate by Gondola Cabin Manufacturer Issuance of Certificate of Occupancy
MM-NOI-A: Prepare a Construction Noise Management Plan. Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Construction Noise Management Plan to minimize the construction-related noise impacts to off-site noise-sensitive receptors. The Construction Noise Management Plan shall include the following measures to reduce noise levels:	Project Sponsor Qualified Noise Consultant Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Submittal of Construction Noise Management Plan by Qualified Noise Consultant Issuance of Applicable Grading Permits

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
• **Noise Barriers**: Temporary construction noise barriers between the Project construction area and affected receptors shall be installed as identified below. The noise barriers shall be designed to have a sound transmission class (STC) rating of at least 25 and should have the ability to provide a range of noise reduction between 5 dBA and 15 dBA when the construction equipment is located below the elevation level of the noise barrier and there is no line-of-sight between the construction equipment and the noise-sensitive receptors. Specific locations and heights for the temporary noise barriers shall include the following by Project components: • Alameda Station ○ For the entire duration of construction, the Project shall provide a 24-foot tall temporary noise barrier between the Project construction site and NSR 3 [Mozaic Apartments]. ○ For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 1A [Union Station] and NSR 1B [First Five LA]. ○ During the Foundations and Columns phase, the Project shall provide a 10-foot temporary noise barrier between the Project construction activities occurring within Alameda Street and NSR 1A [Union Station], NSR 1B [First Five LA], NSR 2 [El Pueblo], and NSR 3 [Mozaic Apartments]. ○ During a portion of the Structural Steel and Gondola Equipment Erection phase and during a portion of the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 3. • Alameda Tower					Compliance Certificate by Qualified Noise Consultant

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
○ For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 4 [The California Endowment]. ○ During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 4. • Alpine Tower ○ For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 6 [Chinatown Senior Lofts] and NSR 7 [Homeboy Industries]. ○ During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 6 and NSR 7. ○ NSR 5 [Future Residential] is currently an undeveloped City-owned parking lot and is proposed for future multi-family residential uses. If NSR 5 is occupied by residential units at the time of Project construction, the following noise barriers shall be provided: ▪ For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 5. ▪ During the Foundations and Columns and Structural Steel and Gondola Equipment Erection phases, the Project shall provide a 24-foot temporary noise barrier between the					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
Project construction site and occupied residential units at NSR 5 [Future Residential]. ▪ During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 5. • Chinatown/State Park Station ○ For the entire duration of construction, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 9 [Blossom Plaza], NSR 10 [Future Residential Development], NSR 11 [Capitol Milling], and NSR 14S [Los Angeles State Park]. The noise barrier will include a gate that may be temporarily opened for access during construction hours along Spring Street for construction access. ○ For the entire duration of construction, the Project shall provide a 10-foot temporary noise barrier between the Chinatown / State Park Station and NSR 8 [College Station] and NSR 12 [Future Residential Development]. ○ During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 8, NSR 12, and NSR 14S. • Broadway Junction ○ For the entire duration of construction, the Project shall provide a 24-foot temporary noise barrier between the Project construction site and NSR 13 [Future Development], NSR 14N [Los Angeles State Historic Park], and NSR 17 [Low Rise Residential].					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
○ During the Demolition phase and the Foundations and Columns phase, the Project shall provide a 24-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School]. ○ During the Structural Steel and Gondola Equipment Erection phase and the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School] ○ During a portion of the Structural Steel and Gondola Equipment Erection phase and during a portion of the Vertical Circulation, Hardscaping, Landscaping, and Interior Work phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between the Project construction site and NSR 13, NSR 14 N, NSR 16, and NSR 17. • Stadium Tower ○ During the Foundations and Columns phase, the Project shall provide an 8-foot temporary noise barrier between the Project construction site and NSR 16 [Cathedral High School] and NSR 17 [Low Rise Residential]. ○ During a portion of the Structural Steel and Gondola Equipment Erection phase, temporary platforms will be installed to facilitate construction activities. While the temporary platforms are installed, the Project shall provide a 10-foot temporary noise barrier on the temporary platforms between Project construction and NSR 16 and NSR 17. • ~~**Equipment Maintenance:** Construction equipment shall be properly maintained per manufacturers' specifications to prevent noise due to worn or improperly maintained parts or shall be fitted with the best available noise suppression devices (e.g., mufflers,~~					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
~~lagging, and/or motor enclosures). All impact tool shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded.~~ ~~• **Use of Electrical Sources:** When possible, electrical sources should be used to power equipment rather than diesel generators.~~ • **Sensitive Uses:** Fixed and/or stationary equipment (e.g., generators, compressors, concrete mixers) shall be located away from noise-sensitive receptors. ~~• **Noise Disturbance Coordinator:** A noise and vibration disturbance coordinator shall be established. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The noise and vibration disturbance coordinator shall determine the cause of the complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to address the complaint. Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event a complaint is received, appropriate corrective actions shall be implemented, and a report of the action provided to the reporting party.~~ ~~• **Construction Notice:** The construction coordinator shall provide a construction notice to residents within 500 feet of the construction site for each Project component prior to initiation of construction activities. The construction site notice shall include job site address, anticipated equipment to be used during the duration of permit number, name and phone number of the job superintendent, construction hours, and the City telephone number where violations can be reported. The notice will also include the phone number of the noise disturbance coordinator.~~ • ~~**Limit Idling Equipment**: Construction equipment shall not idle for longer than 5 minutes, as required by section 2485 of the California Code of Regulations.~~					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
NOI-PDF-B: Project Noise Control Requirements for Construction Noise Management Plan. The Construction Noise Management Plan prepared pursuant to MM NOI-A shall include the following: • **Equipment Maintenance:** Construction equipment shall be properly maintained per manufacturers' specifications to prevent noise due to worn or improperly maintained parts or shall be fitted with the best available noise suppression devices (e.g., mufflers, lagging, and/or motor enclosures). All impact tool shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded. • **Use of Electrical Sources:** When possible, electrical sources should be used to power equipment rather than diesel generators. • **Community Outreach:** The following shall be implemented to reduce impacts to the local community related to disturbances from construction noise: • *Noise Disturbance Coordinator:* A noise and vibration disturbance coordinator shall be established. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The noise and vibration disturbance coordinator shall determine the cause of the complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures to address the complaint. Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners to contact the job superintendent if necessary. In the event a complaint is received, appropriate corrective actions shall be implemented, and a report of the action provided to the reporting party. The noise disturbance coordinator shall conduct	Project Sponsor Qualified Noise Consultant Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Submittal of Construction Noise Management Plan by Qualified Noise Consultant Issuance of Applicable Grading Permits Compliance Certificate by Qualified Noise Consultant

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
outreach to residents and small businesses in English, Spanish, Vietnamese, Chinese (Traditional), and Chinese (Simplified) regarding proposed construction activities. • *Construction Notice:* The construction coordinator shall provide a construction notice to residents and businesses within 500 feet of the construction site for each Project component prior to initiation of construction activities. The construction site notice shall include job site address, anticipated equipment to be used during the duration of permit number, name and phone number of the job superintendent, construction hours, and the City telephone number where violations can be reported. The notice will also include the phone number of the noise disturbance coordinator. The notice will be made available in English, Spanish, Vietnamese, Chinese (Traditional), and Chinese (Simplified). • *Special and Community Event Coordination*: Construction activities will be coordinated to the extent feasible with special and community events reported to the noise disturbance coordinator. Requests for event coordination may be made by calling the number of the noise disturbance coordinator provided on the construction notice. • **Limit Idling Equipment**: Construction equipment shall not idle for longer than 5 minutes, as required by section 2485 of the California Code of Regulations.					
MM-VIB-A: **Vibration Monitoring:** Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Vibration Monitoring Plan. The Plan shall provide for: • Vibration Monitoring Equipment: the placement of vibration monitoring equipment approximately 26	Project Sponsor Qualified Vibration Consultant Construction Contractor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Submittal of Vibration Monitoring Plan by Qualified Vibration Consultant Issuance of Grading Permits

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
feet away from the Avila Adobe (1970s addition), El Grito mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at the Alameda Station requiring heavy equipment or ground compaction devices. • Modification of Vibration Equipment: the monitoring devices shall notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold. The construction crew shall modify the construction equipment to ensure that the vibration damage threshold is not exceeded.					Compliance Certificate by Qualified Vibration Consultant
MM-VIB-B: Force-Adjustable Ground Compaction Devices: For construction work occurring at the Alameda Station in proximity to the Avila Adobe (1970s addition), El Grito Mural, and The Old Winery: • At a distance of 26 feet or more from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery, any ground compacting equipment, including vibratory rollers and plate compactors, shall be calibrated onsite prior to use to ensure vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet. If the ground compacting equipment cannot achieve the assumed reference level, equipment with less vibration (less than 0.21 PPV, in/sec, at 25 feet), non-vibrating equipment, or hand tools shall be required for ground compaction activities. • Any ground compaction or excavation/drilling operations within 26 feet of the Avila Adobe (1970s addition), El Grito Mural or The Old Winery structures must be completed with non-vibrating equipment or hand tools.	Project Sponsor Qualified Vibration Consultant Construction Contractor	Metro and/or the City of Los Angeles	Construction	Once, Plan Check (proof of compliance) Periodic Field Inspections during Construction	Inclusion of requirement in Construction Plan Issuance of Building Permits Compliance Certificate by Qualified Vibration Consultant
Transportation					
TRA-PDF-A: Additional Visibility Enhancements: Subject to the approval of the Los Angeles Department of Transportation, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station, stripe a high visibility crosswalk and add	Project Sponsor Transportation Engineer Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Transportation)	Prior to Completion of Construction	Once, Prior to Completion of Construction	Approval of Additional Visibility Enhancements by the City of Los Angeles (Los Angeles

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.					Department of Transportation) Submittal of Compliance Report Certificate of Occupancy
MM-TRA-A: Visibility Enhancements: Prior to the completion of construction of the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall design the following visibility enhancements at the following locations: • Alameda Tower – Implement a no right turn on red restriction to prohibit vehicles from making a right turn on red from westbound Alhambra Avenue to northbound Alameda Street. • Chinatown/State Park Station – Implement an operational strategy or design to channelize pedestrians walking from the Los Angeles State Historic Park to the crosswalk across the existing driveway south of the Park to prevent pedestrians from crossing the driveway west of columns supporting the Chinatown/State Park Station to ensure crossings occur in the crosswalk where visibility is sufficient. The ultimate design or operational method of channelization (such as station staff directing pedestrians towards the crosswalk or a physical method such as a gate) would be coordinated with State Parks. The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations.	Project Sponsor Transportation Engineer Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Transportation) and California Department of State Parks (as to the Chinatown/State Park Station)	Prior to Completion of Construction	Once, Prior to Completion of Construction	Approval of Visibility Enhancements by the City of Los Angeles (Los Angeles Department of Transportation) and California Department of State Parks (as to the Chinatown/State Park Station) Submittal of Compliance Report Certificate of Occupancy
MM-TRA-B: Construction Traffic Management Plan: Prior to the issuance of a building permit for the proposed Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City for review and approval. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding	Project Sponsor Transportation Engineer Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Transportation)	Pre-Construction	Once, Plan Check (proof of compliance)	Approval of Construction Traffic Management Plan by City of Los Angeles (Los Angeles Department of Transportation)

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
community. The CTMP shall be based on the nature and timing of the specific construction activities at each of the Project construction sites. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project. The CTMP may be updated as construction progresses to reflect progress at the various Project construction sites. The CTMP will include, but not be limited to, the following elements as appropriate: • As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. • Visibility to open pedestrian crossings will be maintained, or temporary or permanent measures consistent with Mitigation Measure TRA-A shall be implemented if determined to be appropriate in coordination with LADOT. In absence of measures to mitigate or eliminate visual obstructions for pedestrians crossing the street, pedestrian crossings may be closed or relocated to more visible locations. • Existing school crossings, as denoted by yellow crosswalk striping consistent with the Manual on Uniform Traffic Control Devices (MUTCD) along proposed detour routes, shall be evaluated in coordination with LADOT to determine if crossing guards should temporarily be assigned. If it is determined that crossing guards should be assigned, on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods during periods when adjacent schools are in session. If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with					Inclusion of requirement in Construction Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
LADOT and would be implemented by the proposed Project if deemed necessary. • As partial and full street closures are anticipated at various locations during portions of the Project construction, detour plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic and bicyclists to alternative routes during these periods. • Ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during project construction. In some cases, alternative access locations would be provided or supervised temporary access through the worksite would be accommodated during construction phases where access is hindered, such as foundation construction. • Coordinate with the City and emergency service providers to ensure emergency access is provided to the Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary. • Conduct bi-monthly construction management meetings with City staff and other surrounding construction-related project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project, or as otherwise determined appropriate by City Staff. • Provide off-site truck staging in a legal area furnished by the construction truck contractor. • Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods. • During construction activities when construction worker parking cannot be accommodated at the Project component sites, identify alternate parking location(s) for construction workers and the					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
method of transportation to and from the Project component sites (if beyond walking distance) for approval by the City 30 days prior to commencement of construction. • Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.					
MM-TRA-C: Temporary Disaster Route Plan: Prior to the issuance of a building permit for the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall submit a temporary disaster route plan to LADOT, which shall include street closure information and detour plans in order to facilitate the movement of emergency vehicles through the study area and minimize effects on emergency response during a disaster. Construction activities and temporary lane closures could quickly be halted in event of an emergency to allow emergency vehicles to travel through the work zones. In addition to detours, the temporary disaster route plan could also include temporary operational measures that would be implemented by the City during a disaster, including temporary contra-flow lanes or reversing directions to flush vehicles during a disaster situation. The temporary disaster route plan would be prepared for the following locations: • During those periods when construction of the Alameda Station, the Chinatown/State Park Station, and the Alameda and Alpine Towers require partial closure of one direction or full closure of both directions of Alameda Street or Spring Street.	Project Sponsor Transportation Engineer Construction Contractor	Metro and/or the City of Los Angeles (Los Angeles Department of Transportation)	Pre-Construction	Once, Plan Check (proof of compliance)	Approval of Construction Traffic Management Plan by City of Los Angeles (Los Angeles Department of Transportation) Inclusion of requirement in Construction Plan
Tribal Cultural Resources					
MM-TCR-A Native American Monitor. Because of the potential to encounter tribal cultural resources, a Native American monitor shall be retained to monitor project-related, ground-disturbing construction activities (e.g., boring, grading, excavation, drilling,	Project Sponsor Qualified Native American Monitor	Metro and/or the City of Los Angeles	Pre-Construction Construction	Once, Plan Check (proof of compliance)	Cultural Resources Monitoring and Mitigation Plan If Cultural Resources That May Be of

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
trenching) that occur after existing pavement and structures are removed at the location of the Alameda Station. If cultural resources are encountered elsewhere along the alignment during construction that, in the opinion of the archaeological Principal Investigator (as defined in 32 CFR Section 767.8), are likely of Native American origin, then Native American monitoring may be extended to include the area of the find. The Principal Investigator will make the recommendation to the Project Sponsor and Metro if it seems the Native American monitoring should be extended. The appropriate Native American monitor shall be selected based on ongoing coordination with consulting tribes and shall be identified in the CRMMP. The CRMMP is described in Mitigation Measure CUL-A. Specifically, the CRMMP and Native American monitoring would be applicable to ground disturbance activities extending into native soils at the location of the Alameda Station and, if cultural resources are encountered elsewhere along the alignment during construction that, in the opinion of the archaeological Principal Investigator, are likely of Native American origin. Monitoring procedures and the role and responsibilities of the Native American monitor shall be outlined in the CRMMP. In the event the Native American monitor identifies cultural or archeological resources, the monitor shall be given the authority to temporarily halt construction (if safe) within 50 feet (15 meters) of the discovery to investigate the find and contact the archaeological Principal Investigator. The Native American monitor and consulting tribe(s) shall be provided an opportunity to participate in the documentation and evaluation of the find. If a data recovery plan is prepared, the consulting tribe(s) shall be provided an opportunity to review and provide input on the plan.	Construction Contractor			To Be Determined by the Archaeological Principal Investigator	Native American Origin Are Discovered, Data Recovery Plan
Utilities and Service Systems					
MM-USS-A: Development of a Utility Relocation Plan: Before the start of construction-related activities, including the relocation of utilities, the Project Sponsor shall coordinate with the Los Angeles Department of Water	Project Sponsor Civil Engineer	Metro and/or the City of Los Angeles (Los Angeles Department of Water & Power, the	Pre-Construction	Once, Pre-Construction (proof of compliance)	Approval of the Utility Relocation Plan

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
& Power, the Los Angeles Sanitation & Environment Department, the Southern California Gas Company, and Metro to prepare a Utility Relocation Plan. The Project Sponsor shall also coordinate with the utility companies to minimize impacts to services throughout the Project and obtain their approval of the Utility Relocation Plan. The Utility Relocation Plan shall be prepared, reviewed, and approved by a licensed civil engineer and, at a minimum, include the following: • Plans that identify the utility infrastructure elements, including access for utility providers and easements, as applicable, that require relocation as a result of the proposed Project; • Safety measures to avoid any human health hazards or environmental hazards associated with capping and abandoning some utility infrastructure, such as natural gas lines or sewer lines; and • Timing for completion of the utility relocation, which shall be scheduled to minimize disruption to the utility companies and their customers.	Construction Contractor	Los Angeles Sanitation & Environment Department) and Southern California Gas Company			
Wildfire					
WFR-PDF-A: The Project will prepare a Fire Protection Plan, which will be implemented during construction of the Broadway Junction, Stadium Tower, Dodger Stadium Station, <u>and Chinatown/State Park Station</u>. The Fire Protection Plan will include the following measures that shall be implemented to the extent applicable in order to further reduce risks associated with ignition of wildland fire: • Prior to the start of any construction activities, a Fire Prevention Program Superintendent shall be designated to interface with the LAFD and coordinate fire watch and site fire prevention and response. • In exceedance of regulatory requirements, the Fire Prevention Program Superintendent shall prohibit hot work construction activities during Red Flag	Project Sponsor Fire Consultant Construction Contractor	Metro and/or the City of Los Angeles (LAFD)	Pre-Construction Construction	Once, Plan Check (proof of compliance) Period Field Inspection during Construction by Fire Prevention Program Superintendent	Fire Protection Plan by the Fire Consultant Training Records Provided to the City, LAFD, and Metro

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
Warnings, which are issued for a stated period of time by the National Weather Service using pre-determined criteria to identify particularly critical wildfire danger in a particular geographic area. • Prior to the start of any hot work construction activities, the Fire Prevention Program Superintendent will implement tiered fire watches with increased staff tasked with monitoring for ignitions during hot work activities (fire watch). The fire watch shall be provided during hot work and shall continue to monitor for a minimum of 30 minutes following completion of the hot work activities. The Fire Prevention Program Superintendent may determine during construction that this monitoring period be increased based on the potential for weather conditions that may increase the potential for sparks to be carried by the wind and result in ignition (i.e., the potential for high wind events, high temperature, and/or low relative humidity). • Prior to the start of any construction activities, the construction manager in coordination with the Fire Prevention Program Superintendent shall provide site fire safety training for all construction crew members, including on the regulatory requirements set forth in Section 3.20.2, the proper use of firefighting equipment, and procedures to be followed in the event of a fire. Project staff shall be trained prior to the start of construction to identify and report to the appropriate authority potential fire safety hazards, including the presence of sparks or smoke. The construction manager shall maintain training records which will be available for review by Metro, the City, and LAFD. • Prior to the start of construction, the construction area shall be cleared of all dead and downed vegetation and dead or dry leaves and pine needles from the ground. Trees within the construction area shall either be removed or trimmed to keep branches a minimum of 10 feet from other trees. Vegetation within the construction area shall be					

Project Design Feature or Mitigation Measure	Responsible Party	Monitoring / Enforcement Agency	Monitoring Phase	Monitoring Frequency	Action(s) Indicating Compliance
controlled through periodic cutting and spraying of weeds. • Ongoing fire safety inspections and patrols of the construction site shall be integrated into Project site security procedures for the duration of construction. The assigned fire patrols shall verify the proper tools and equipment are on site, serve as a lookout for fire starts, including participating in a fire watch to make sure no residual fire exists following the completion of the construction activity. • Each construction area shall be equipped with fire extinguishers and firefighting equipment sufficient to extinguish small flames. • The Fire Prevention Program Superintendent shall provide outreach and orientation services to responding fire stations including pre-staging measures prior to the start of hot work construction activities. • Any fire ignited on site shall be promptly reported to LAFD.					
WFR-PDF-B: Prior to the start of construction, the Project shall provide a fuel modification zone surrounding the Stadium Tower construction site starting from the construction area perimeter of either 70 feet or until the nearest paved roadway that thins or removes all vegetation, dead or dry leaves and pine needles from the ground, and trims or remove trees to keep branches a minimum of 10 feet from other trees. The Stadium Tower construction site plan shows a buffer zone of 70 feet or to nearest paved roadway.	Project Sponsor Construction Contractor	Metro and/or the City of Los Angeles (LAFD)	Pre-Construction	Once, Plan Check (proof of compliance)	Field Inspection Issuance of Applicable Building Permit for Stadium Tower
WFR-PDF-C: During operation of Broadway Junction, Stadium Tower, Dodger Stadium Station, <u>and Chinatown/State Park Station</u>, security monitoring by staff and cameras shall be implemented. Project staff shall be trained to identify and report to the appropriate authority potential fire safety hazards, including the presence of sparks or smoke. Any fire ignited on site shall be promptly reported to LAFD.	Project Operator	Metro and/or the City of Los Angeles	Prior to issuance of Certificate of Occupancy	Once, prior to issuance of Certificate of Occupancy	Inclusion of requirement in Emergency Operations Plan Issuance of Certificate of Occupancy

5.0 References

For ease of reference, this section provides the references for the Final SEIR only.

Section 1.0 Introduction

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Section 2.0 Corrections and Additions

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Section 3.0 Response to Comments

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Section 4.0 Mitigation Monitoring and Reporting Program

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6.0 List of Preparers

For ease of reference, this section provides the lead agency and list of preparers for the SEIR only. The list preparers from Section 9.0, List of Preparers, of the Final EIR, is incorporated by reference.

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