

PUBLIC UTILITIES COMMISSION

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March 29, 2023

Georgia Sheridan, Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-3
Los Angeles, CA 90012
greenlineextension@metro.net

**SUBJECT: SCH# 2021010269; C Line (Green) Extension to Torrance Project - Draft Environmental Impact Report**

Dear Ms. Sheridan,

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) and rail transit projects in California. All rail fixed guideway systems are subject to the Commission's Safety Oversight Program requirements. Safety Certification Plan (SCP) approval and Safety Certification Verification Report (SCVR) approval is required for rail transit projects to be placed in revenue service. In addition, the California Public Utilities Code requires Commission approval for construction or alteration of crossings and grants the Commission exclusive power on design, alteration, and/or closure of crossings in California. The Commission's Rail Transit Safety Branch (RTSB) will review rail transit project matters and the Rail Crossings and Engineering Branch (RCEB) will review crossing matters. The Commission has received a copy of the *Draft Environmental Impact Report (DEIR)* from the Los Angeles County Metropolitan Transportation Authority (Metro), who is the lead agency for the proposed C Line (Green) Extension to Torrance Project (CLGET Project).

According to the DEIR, the CLGET Project is a light rail transit (LRT) project that would extend for approximately 4.5-miles from the existing Redondo Beach (Marine) Metro C Line (Green) Station southeast to the Torrance Transit Center (TC), along the Metro-owned Harbor Subdivision railroad right-of-way (Metro ROW), with a combination of elevated and at-grade segments. The Project Area includes portions of the Cities of Hawthorne, Lawndale, Redondo Beach, and Torrance.

Alternatives studied include a No Project Alternative and three Project Alternatives, as follows:

- **Alternative 1: Proposed Project (Metro ROW)**

Consists of a 4.5-mile segment along the Metro ROW, that will remain shared with freight service. The freight track will be shifted to one side of the right of way to accommodate two light rail tracks. This alignment is comprised of a combination of elevated and at-grade segments. This alignment includes six grade-separated crossings in the north (between Inglewood Ave and 162nd Street) and two at-grade crossings at 170th Street and 182nd Street. The freight track will remain at grade at existing locations.

Alternative 1 has two Options:

- **Option 1: Trench Option along Metro ROW alignment**

The Trench Option follows the same alignment as the Proposed Project, with a combination of below grade (trench) and at-grade segments. In the northern part of the alignment, the light rail would travel in an open-air trench for approximately two miles, crossing under eight streets between Inglewood Avenue and 182nd Street. At-grade segments are proposed between 173rd Street and Grant Avenue and south of 182nd Street, where the light rail would cross over existing grade-separated crossings (bridges) at Artesia Boulevard, Grant Avenue, Hawthorne Boulevard, and 190th Street. This option would be entirely grade-separated with no rail crossings at street level. South of 190th Street, the alignment and Torrance TC Station would be identical to the Proposed Project.

- **Option 2: Hawthorne Boulevard Option (entirely elevated)**

The Hawthorne Option would start within the existing Metro ROW at the Redondo Beach (Marine) Metro C (Green) Line Station, leave the Metro ROW to parallel I-405 between Inglewood Avenue and Hawthorne Boulevard, and follow Hawthorne Boulevard south between 162nd Street and 190th Street. The entire alignment within the Hawthorne Option segment would be elevated, for approximately 2.7 miles. South of 190th Street, the alignment and Torrance TC Station would be identical to the Proposed Project.

- **Alternative 2: 170th/182nd Grade-Separated Light Rail Transit**

The 170th/182nd Grade-Separated Light Rail Transit Alternative would be identical to the Proposed Project (Alternative 1) in the north with an elevated segment of light rail between Inglewood Ave and 162nd Street. In the south, the light rail would be grade separated from the roadways at 170th Street and 182nd Street, with the light rail tracks located below street level in a trench. Between 170th Street and 182nd Street, the Alternative would be identical to the Trench Option (Option 1). All other aspects of the project would be the same as the Proposed Project. This Alternative would be entirely grade-separated with six over-crossings in the north (between Inglewood Ave and 162nd Street) and two below-grade crossings at 170th and 182nd Streets.

- **Alternative 3: High Frequency Bus (HFB)**

The HFB Alternative would implement a rapid bus service instead of a light rail extension. The bus line would be a local express service with some bus rapid transit characteristics. The service may be as frequent as that proposed for light rail, though its ability to attract ridership would be less due to less travel time savings and fewer amenities. The buses would operate in mixed-flow traffic with transit signal priority systems, which give priority to transit vehicles at signalized intersections by giving an early green signal or holding a green signal. There would be a total of four bus stops between the existing Redondo Beach (Marine) Station and Torrance TC, compared to two light rail stations in the Proposed Project. Travel times from end to end would be about 25 minutes, which is faster than local bus service (approximately one hour, with a transfer), but slower than the travel times expected from the Proposed Project (approximately seven minutes).

The CLGET Project described in the DEIR is subject to several rules and regulations involving the Commission. These may include, but are not limited to:

- California Public Utilities Code, Sections 1201 et al, which requires Commission authority to construct rail crossings,
- California Public Utilities Code, Section 99152; rail transit safety,
- Commission's Rules of Practice and Procedure, which detail the Formal Application process for construction or modification of public crossings. These are available on the CPUC web site. www.cpuc.ca.gov

The design criteria of the proposed CLGET Project must comply with Commission General Orders (GOs), such as:

- GO 26 series, Clearances on Railroads and Street Railroads With Reference to Side and Overhead Structures, Parallel Tracks, Crossings of Public Roads, Highways and Streets,
- GO 72 series, The Construction and Maintenance of Crossings At-Grade of Railroads with Public Streets, Roads and Highways in the State of California (if any),
- GO 75 series, Standards for Warning Devices for At-Grade Highway-Rail Crossings in the State of California (if any),
- GO 88 series, Rules for Altering Public Highway-Rail Crossings (if any),
- GO 95 series, Overhead Electric Line Construction (if catenary is used),
- GO 128 series, Construction of Underground Electric Supply and Communication Systems,
- GO 143 series, Safety Rules and Regulations Governing Light-Rail Transit, and
- GO 164 series, Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems

The project must ensure compliance with federal regulations including:

- 49 CFR Part 674, State Safety Oversight

The following link provides resources on the Commission's rules and regulations regarding rail safety: <https://www.cpuc.ca.gov/about-cpuc/divisions/rail-safety-division>

While the DEIR identified less than significant impacts to Transportation and Safety for the Light Rail Alternatives studied, it is important to note that two of the crossings in the Proposed Project are planned at-grade. The at-grade crossings at 170th Street and at 182nd Street are existing freight track crossings. The Proposed Project would modify each 1-freight track crossing into a wider 3-track crossing (2-light rail & 1-freight) and increase the frequency of train activity. Both crossings are in residential communities and the 182nd Street crossing is located approximately ¼ mile from Adams Middle School and Washington Elementary School. The impact to safety of pedestrians at these locations must be evaluated and mitigated. If the Proposed Project is selected, Commission staff recommend Metro also select either Option 1 (Trench Option) or Option 2 (Hawthorne Option) as both options consist of entirely grade separated light rail crossings and will eliminate the potential for future light rail related crossing incidents.

The DEIR also identified significant impacts due to noise as a result of the combination of relocated freight tracks and light rail noise, as well as overall train service operations for Alternatives proposed along the Metro ROW. The DEIR also indicates that Metro proposes to mitigate these noise impacts by designing and modifying all at-grade crossings to include all required equipment needed to allow local jurisdictions to designate a quiet zone. Additional proposed mitigation measures include requesting authorization from the Commission to: (1) install bell shrouds (PF-NV-2) on crossing warning device bells, and (2) implement a gate-down-bell-stop variance (PF-NV-3). The Commission's RCEB staff will not support a gate-down-bell-stop variance, as the audible warning provided by bells will remain the only source of audible warning afforded to pedestrians if a quiet zone is established along this rail corridor. Thus, Metro should not assume that a gate-down-bell-stop variance will be authorized as a noise mitigation measure. Metro should reevaluate noise impacts without the availability of a gate-down-bell-stop variance as a mitigation.

We understand that this is a complex and challenging project with funding, design, and environmental approval considerations for Metro. Assuming the project advances in some form, the Commission will need to provide applicable regulatory oversight for the CLGET Project. Oversight activities include approval of the CLGET Project SCP and SCVR, selected document reviews, sampling inspections, participation in fire-life safety and safety-certification related meetings, and pre-revenue testing observations. Commission staff will provide the CLGET Project team a project-specific Safety and Security Certification Oversight Plan (SSCOP) after Commission approval of CLGET Project's SCP. The SSCOP will detail Commission staff's oversight process and activities prior to the Project's proposed revenue service date.

The proposed project must also conform to the goals of the CPUC's Environmental and Social Justice Action Plan. This includes improving safety and access to transportation, improving local air quality and public health, and expanding outreach and public participation opportunities in disadvantaged communities. For more information, please visit <https://www.cpuc.ca.gov/esjactionplan>.

We encourage early coordination between Commission staff and Metro personnel in order to provide consultation on proposed design and engineering of the CLGET Project prior to Metro filing applications seeking Commission authorization to construct.

Thank you for the opportunity to comment on the Metro's DEIR for the CLGET Project. We look forward to working with Metro. Please feel free to contact me at (916) 803-0736 or daren.gilbert@cpuc.ca.gov or contact our lead staff on this project: Madeline Ocampo at (213) 503-5243 or madeline.ocampo@cpuc.ca.gov for transit safety matters, and Jose Pereyra at (213) 479-0181 or jose.pereyra@cpuc.ca.gov for crossing matters.

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Sincerely,

A handwritten signature in black ink, appearing to read "Daren Gilbert". The signature is written in a cursive, flowing style.

Daren Gilbert, Manager
Rail Transit Safety Branch
Rail Safety Division

cc: State Clearinghouse
Roger Clugston, Director, Rail Safety Division, CPUC
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