

Outlook

Fw: My speech & PDF's

From niki77@verizon.net <niki77@verizon.net>
Date Fri 10/24/2025 1:34 AM
To Natalie Champion <natalie@southbaycities.org>

 5 attachments (22 MB)

TorranceRefinery_DEIR_letter.pdf; Torrance Logistics Pipeline Letter DEIR.pdf; TorranceRefinery Metro response.pdf; TorranceRefinery MarathonPipeline Metro Response.pdf; Torrance Logisitcs Metro's response.pdf;

Hi Natalie, it was bugging me so I went and piece mealed pretty much verbatim what I said at the BOD meeting as follows:

COG Board of Directors 10/23/25

Niki Negrete-Mitchell, Redondo Beach ROW stakeholder, Gardena Mohican alum class of 77 and 4th generation South Bay native.

Thanks to Hermosa Beach for voting 4-1 to support Redondo, Lawndale and City of Hawthorne on no to ROW and yes on Hawthorne Bl. Especially thank you to Ray Jackson for your kind words.

Do you realize that anyone supporting the ROW Hybrid route are supporting putting more than 300 65+ at risk of displacement? Impacts from construction for 6 yrs 24/7 alone is enough to shorten lives. This includes me in a trenching zone. I have a compromised immune system.

Are you aware that on their own letterhead Torrance refinery and Torrance Logistics pipeline owners sent letters to Metro raising objections on the proposed project due to concerns of breaching internal safety protocols and severe risk to public safety. The refinery refers to possible "incidents", aka explosions/fires. This warrants serious consideration.

The FEIR offers no consolation, only that Metro refined their footprint lessening encroachments on the refinery but does not change significant impacts. They indicate they have not worked out pipeline issues yet, which poses risks to operations at LAX.

It's illogical to think a transit agency knows better than the actual gas and refinery industry professionals.

The Dodger stadium gondola project was certified, but the state court of appeals ended up rejecting the FEIR as environmentally non compliant, demonstrating that issues raised by the public are meaningful and thereby validated.

Another is a union station project build which just got certified but with conditions or supplemental EIR.

The Metro Board may certify the C-line extension, but we are fairly certain with the concerns raised by the refinery and pipeline companies validating our public concerns, there is very little chance they should be able to just straight up certify and push the c line extension project through as currently is.

The only solution to all of the above is to route the extension down Hawthorne Bl, and consider ending at the galleria to avoid the refinery. We already have housing planned at the galleria and along Hawthorne in the city of Lawndale so this would be a reasonable compromise. A LOT of Torrance residents would be relieved. Plus that location is highly toxic.

I encourage all of you when you go back to your cities, write a letter supporting the Hawthorne Bl option and send it to greenlineextension@metro.net.

Thank you.

----- Forwarded Message -----

From: niki77@verizon.net <niki77@verizon.net>

To: Natalie Champion <natalie@southbaycities.org>

Sent: Thursday, October 23, 2025 at 11:37:47 PM PDT

Subject: My speech & PDF's

Hi Natalie,

Thank you so much for your kindness tonight. I really appreciate it.

Here's my speech and below are PDF's of the letters from Torrance Refinery and Torrance Logistics pipelines. Also are some of Metro's responses to them, but certainly not all. That FEIR section is so cluttered that the important things are needles in a haystack. (one of the PDF's may be a repeat, sorry)

Now I just accidentally deleted my whole speech from tonight. I'm just too exhausted. But thanks again and sorry about my lost speech.

Niki

5.4 RESPONSES TO GROUPS AND ORGANIZATIONS

Submission 8 Teri Shinde, Torrance Logistics Company LLC

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Submission 45 Tony Dolim, South Bay Estates

- 45-1 The commenter's opposition to the alignments along the Metro ROW is noted. All comments have been shared with the Metro Board for its consideration. See MR-1: Selection of Alternatives. Also see responses to Comments 45-2 through 45-6.
- 45-2 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. Metro is also committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. The LPA, selected by the Metro Board in May 2024, the Trench Option, and the Hawthorne Option would fully grade separate light rail from all roadways, thereby avoiding potential light rail train conflicts with pedestrians or cyclists. Existing freight crossings would be upgraded with safety



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March 28, 2023

Via Email

Georgia Sheridan
Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop: 99-22-3
Los Angeles, CA 90012

Re: Torrance Logistic Company LLC's Comments on Draft Environmental Impact Report for Los Angeles County Metropolitan Transportation Authority's Proposed C Line (Green) Extension Project

Ms. Sheridan:

Torrance Logistics Company LLC ("TLC") appreciates the opportunity to provide these comments on the Los Angeles County Metropolitan Transportation Authority's ("Metro") Draft Environmental Impact Report ("DEIR") prepared for the proposed C Line (Green) Extension to Torrance Project ("Proposed Project"). TLC owns and operates several petroleum pipelines that are within rights-of-way ("ROWs") located within the scope of the Proposed Project. These pipelines are critical to conveying petroleum products between the Torrance Refinery ("Refinery") and downstream pipelines, facilities, and customers.¹

TLC has operated the Torrance Logistics assets ("Assets") since acquiring the Assets in 2016 from the former owner and operator, ExxonMobil Oil Corporation. TLC transports various petroleum products that support the surrounding communities and is critical in the jet fuel supply for the Los Angeles International Airport ("LAX"). TLC has been a vital and integral part of Los Angeles County's and State's economy and community fabric for many years. TLC employs approximately 100 Southern California residents and numerous contractors on a daily basis during normal operations, most of whom work in close proximity to the Proposed Project. As an operator of critical pipeline facilities in areas that would be directly affected by the Project, TLC shares the serious concerns TORC and others have that the Proposed Project would cause significant adverse safety, security, access, and other impacts to

¹ TLC joins in the comments submitted by the operator of the Refinery, Torrance Refining Company ("TORC"), and incorporates them herein by reference.

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our employees, operations, contractors, and surrounding community and environment that have not been adequately reviewed and addressed in the DEIR.

We join in the comments from TORC noting that the California Environmental Quality Act (“CEQA”) and its regulatory CEQA Guidelines require the DEIR to fully advise the public of all potential significant environmental impacts of the Proposed Project and assess potentially feasible Project alternatives that can help avoid or substantially mitigate these impacts. *See* 14 C.C.R. (“CEQA Guidelines”) § 15126.4(a)(1). The DEIR does not identify many of the safety, security, access, and other impacts associated with the Proposed Project’s proximity to the Refinery, let alone discuss proposed feasible Project alternatives that could mitigate or avoid those impacts.

We also share TORC’s concern that many of these issues have resulted from Metro’s inadequate consultation with TORC and TLC prior to the release of the DEIR. Particularly concerning is Metro’s proposal to make final decisions on alignment and other project options by Spring 2023, even as the DEIR remains substantially incomplete. We urge Metro to have this proper consultation and avoid rushing the project through without properly assessing and disclosing to the public the full range of environmental consequences and impacts flowing from the Proposed Project. TLC reserves the right to supplement these comments as needed to capture any additional concerns it may identify in its ongoing review of the DEIR.

I. The Proposed Project Would Require an Easement Through or Acquisition of Refinery Property That Would Cause Significant Adverse Impacts to TLC

As TORC has mentioned in its comment letter, Metro only approached TLC and TORC in the past month – well after the DEIR’s release – that Metro would need to either obtain an easement through or acquire a significant section of the TORC Refinery Property for an access road to be used by the Project. TLC’s ROWs, containing the Assets, are located in this area, which runs along the south perimeter of the Refinery immediately adjacent to the existing rail line property owned in parts by both BNSF and Metro.

The access road at issue is used by TLC’s vehicles, employees, and contractors, and includes a number of substructure facilities including two critical Assets operated by TLC. Ready access to these critical pipelines is required for regular routine inspection and maintenance pursuant to various Federal and State regulations (*see, e.g.*, 49 CFR Part 195, Subpart F. Project development impacting access to, or the path of the Assets could require the Assets to be altered or moved. Alteration or relocation of these pipelines and related infrastructure would necessitate an extensive period of

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construction in and around the impacted area, causing additional noise, air quality, traffic, and other impacts associated with such construction activities. Additionally, any alteration or relocation would require the pipelines to be shut down for some extended period of time, which would adversely impact TORC and TLC operations and California consumers.

The Proposed Project's annexation of a large section of the existing TORC's Refinery's southwestern perimeter for an access road will present a host of logistical and operational challenges for the Proposed Project, TORC, and TLC that have not been addressed at all in the DEIR. Questions of whether and how the Proposed Project, TORC's Refinery, and TLC's Assets could accommodate the other's operations are numerous and complex. TORC and TLC believe that Metro should engage an independent third-party expert consultant to study the impacts of the proposed access road annexation and any other encroachment on existing TORC Refinery property and TLC's Assets, identifying all of the work that would be required to ensure TORC's Refinery's and TLC's ROWs' ongoing compliance with environmental, emergency response, safety, and related requirements, if the Proposed Project were to require an easement or acquisition for an access road or any other encroachment through the affected area. The results of this study should be shared with TORC, TLC, and the public and fully incorporated into any future revised DEIR, along with an analysis of the potential impacts of the work required and the potential alternatives to the Proposed Project that could mitigate or avoid these issues and impacts.

II. The Project Would Require the Relocation of TLC's Active Jet Fuel Line Along the Route of Proposed Option 1

In addition to the concerns raised in Item I, within the past month TLC was notified of the potential relocation of its active Jet Fuel Pipeline at approximately five locations north of the Refinery, along the proposed route identified as Option I. Again, the pipeline that operates within the railroad property in TLC's ROWs is critical to the operation of LAX. The coordination of downtime of this Asset to accommodate the proposed alterations or relocations of the pipeline would have a significant impact on the operations of TORC, TLC, LAX, and California consumers. In addition, as noted above, alteration or relocation of this pipeline would necessitate an extensive period of construction in and around the affected area, causing additional noise, air quality, traffic and other impacts associated with construction activities.

Again, as discussed above, TLC urges Metro to engage a third-party expert to assess the potential impacts associated with the alteration or relocation of pipelines, particularly critical ones like TLC's pipeline to LAX, along with potential alternatives to mitigate or avoid those impacts. The results of this study should be incorporated into

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a revised and recirculated DEIR for further review and comment by the public before Metro proceeds with the Proposed Project.

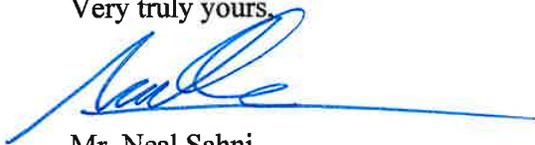
III. The Proposed Timeline for Selection of a Project Alternative is Unrealistic and Disregards the Time Needed to Address the Important Potential Impacts Discussed Above

The DEIR notes that Metro staff intend to present a final recommendation on their Proposed Project route(s) alignment by Spring 2023, ostensibly as part of or a prelude to issuance of a Final EIR. TLC believes that the issues identified above are both challenging and complex. But these impacts must be addressed now. They are reasonably foreseeable and significant, and their analysis (and analysis of potential mitigation measures) cannot be “piecemealed” or deferred to a later date. *See* Cal. Pub. Res. Code § 21065; CEQA Guidelines §§ 15126.4(a)(1)(B), 15378(a). While TLC stands ready to work cooperatively and collaboratively with Metro staff in assessing the impacts related to the Proposed Project’s proximity to TLC’s Assets, the full picture of potential impacts from the Proposed Project simply will not be known by this spring. TLC urges Metro staff to undertake a full and fair analysis of all the Proposed Project’s potential impacts, and not to cut this process short to meet artificial or unrealistic deadlines.

* * *

Again, TLC appreciates the opportunity to provide these comments on the Proposed Project. Despite the concerns outlined above, we remain ready and willing to engage with Metro staff to address these concerns and assess the full range of the Proposed Project’s potential impacts, alternatives, and mitigation measures to alleviate or avoid these impacts.

Very truly yours,



Mr. Neal Sahni
Vice President Logistics Operations

cc: Teri Shinde
Barbara Graham
Arthur G. Warden, III

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Submission 139 Barbara Graham, Torrance Refining Company

- 139-1 Metro acknowledges the facts listed about TORC. The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.
- 139-2 Metro initiated coordination with TORC and TLC in 2022, prior to the release of the Draft EIR, and continues to coordinate with both parties.

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

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

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

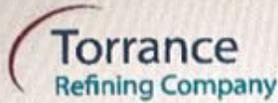
Submission 139 Barbara Graham, Torrance Refining Company

- 139-1 Metro acknowledges the facts listed about TORC. The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.
- 139-2 Metro initiated coordination with TORC and TLC in 2022, prior to the release of the Draft EIR, and continues to coordinate with both parties.

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

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

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



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March 27, 2023

VIA EMAIL: greenlineextension@metro.net
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Georgia Sheridan
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Re: Torrance Refining Company LLC's Comments on Draft Environmental Impact Report for Los Angeles County Metropolitan Transportation Authority's Proposed C Line (Green) Extension Project

Ms. Sheridan:

Torrance Refining Company LLC ("TORC") appreciates the opportunity to provide these comments on the Los Angeles County Metropolitan Transportation Authority's ("Metro") Draft Environmental Impact Report ("DEIR") prepared for the proposed C Line (Green) Extension Project ("Proposed Project"). TORC operates a petroleum refinery ("Refinery") located at 3700 W. 190th Street in Torrance, California, immediately adjacent an existing commercial freight rail right-of-way that is currently included as part of the Proposed Project.

TORC has operated the Torrance Refinery ("Refinery") since acquiring the Refinery in 2016 from the former owner and operator, ExxonMobil Oil Corporation. The Torrance Refinery has been operating in the City of Torrance ("City") for almost 100 years.¹

TORC refines and supplies approximately 20 percent of Southern California's California-compliant fuels, 32 percent of the jet fuel for Los Angeles International Airport, and 40 percent of the North American Emission Control Area marine diesel to the Port of Los Angeles, in addition to other necessary petroleum products to California and surrounding states. These fuels provide part of the critical backbone of the energy infrastructure used every day by over 50 million people across the Western United States. TORC has been a

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¹ TORC joins in and incorporates by reference the comments submitted by Torrance Logistics Company LLC ("TLC"), the operator and owner of multiple pipelines and related infrastructure that are used to convey petroleum products between the Refinery and downstream pipelines, facilities, and customers.

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vital and integral part of the City's, Los Angeles County's, and California's economy and community fabric for many years. TORC currently employs approximately 588 Southern California residents and 495 contractors on a daily basis during normal operations, most of whom work in close proximity to the Proposed Project.

As an operator of a major industrial facility in the South Bay that would be directly impacted by the Proposed Project, TORC has serious concerns that the Proposed Project would cause significant adverse safety, security, access, and other impacts to our employees, operations, contractors, and surrounding community and environment that have not been adequately reviewed and addressed in the DEIR. We are also concerned that the DEIR does not discuss the potential adverse impacts of adding prospective passengers to a rail line previously used only for commercial freight, including passengers' proximity to potential heat, noise, and air quality impacts that would be associated with any unexpected Refinery emergency incident or necessary equipment maintenance activities.

Under the California Environmental Quality Act ("CEQA") and its regulatory CEQA Guidelines, the DEIR is required to advise the public of these significant environmental impacts related to the Proposed Project and assess potentially feasible Project alternatives that can help avoid or substantially mitigate these impacts. *See* 14 C.C.R. ("CEQA Guidelines") § 15126.4(a)(1). Unfortunately, the DEIR does not identify many of the safety, security, access, and other impacts associated with the Proposed Project's proximity to the Refinery, let alone discuss proposed feasible Project alternatives that could mitigate or avoid those impacts. TORC urges Metro to address these deficiencies in order to comply with the requirements of CEQA and the CEQA Guidelines. Until this happens, the DEIR is premature and must be revised to address these issues and impacts and then recirculate for further review and comment by the public.

We also note that many of the issues and impacts associated with the Proposed Project discussed in detail below have been exacerbated by insufficient discussions between Metro and TORC prior to the release of the DEIR. In our view, this has resulted in a rushed and incomplete DEIR that has not yet assessed and disclosed to the public the full range of environmental consequences and impacts flowing from the Proposed Project. Indeed, as discussed below, the scope and breadth of the remaining outstanding issues and impacts associated with the Proposed Project related to its close proximity to the Refinery makes it difficult to envision that they will all be fully resolved in time to allow Metro staff to make an informed recommendation on preferred Proposed Project options by Spring 2023. In any event, while we believe CEQA certainly requires Metro to address the impacts discussed below before the Proposed Project can proceed, TORC reserves the right to supplement these comments as needed to capture any additional concerns and impacts it may identify in its ongoing review of the DEIR.

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I. The Proposed Project Would Require an Easement Through or Acquisition of Refinery Property That Would Cause Significant Adverse Impacts to TORC

While TORC has monitored the public progress of the Proposed Project, it was only in the past month – well after the release of the DEIR – that Metro notified TORC and TLC that Metro would need to either obtain an easement through or acquire a significant section of the Refinery for an access road related to the Proposed Project. The section of TORC property at issue is in the southwest corner of the Refinery, in an area adjacent to a tank farm and containing a critical access road for Refinery vehicles. This area is located approximately within 420 feet of two tanks containing petroleum products and within approximately 1,000 feet of the Refinery’s two main flares. When these flares are required to operate (e.g., in an emergency or for necessary equipment maintenance purposes), they emit substantial amounts of radiant heat in the immediate vicinity of this area.

The access road at issue is used every day by Refinery vehicles, employees, and contractors. Refinery vehicles are required to have a turning radius of at least 44 feet to safely navigate this road in either direction. Also, there are active pipelines adjacent to the tank farm in this area, which further restrict vehicles’ turning radius. Additionally, the access road must provide a safe path of egress for vehicles, employees, and first responders in the event of an emergency. Accordingly, it is crucial that Refinery and first responder vehicles continue to have unrestricted access to this area for regular Refinery activities and for necessary emergency operations.

As discussed above, TORC is deeply concerned that the Project’s proposal to annex Refinery property that would limit access to this the section of Refinery could adversely impact the Refinery’s ability to comply with applicable regulatory requirements regarding emergency response and employee and contractor safety, and could require TORC to spend significant time and resources relocating operating infrastructure away from this area (also creating additional impacts from those corresponding construction efforts). All of these impacts would cause significant hardship to TORC’s operations.

In addition to the logistical, emergency response, and safety issues for TORC’s Refinery raised above, the proposed easement or acquisition for an access road in this area of the Refinery could also impact TLC’s rights-of-way (“ROWs”), which contain multiple pipelines and related infrastructure that are used to convey petroleum products between the Refinery and downstream pipelines, facilities, and customers. Ready TLC employee and contractor access to these pipelines in the ROWs is necessary for legally mandated inspections, maintenance, and to address any leaks that may occur over time. Accordingly, the Project’s proposal would limit TLC access to (or the path of) the TLC’s pipelines and related infrastructure in the ROWs, and could require the pipelines to be altered or moved. Alteration or relocation of these pipelines and related infrastructure would necessitate an extensive period of construction in and around the impacted area, causing additional noise,

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air quality, traffic, and other impacts associated with such construction activities. Additionally, any alteration or relocation would require the pipelines to be shut down for some extended period of time, which would adversely impact TORC and TLC operations and California consumers.

The Proposed Project's annexation of a large section of the existing Refinery's southwestern perimeter for an access road will present a host of logistical and operational challenges for the Proposed Project, TORC, and TLC that have not been addressed at all in the DEIR. Questions of whether and how the Proposed Project, TORC's Refinery, and TLC's pipelines and related infrastructure could accommodate the other's operations are numerous and complex. TORC and TLC believe that Metro should engage an independent third-party expert consultant to study the impacts of the proposed access road annexation and any other encroachment on existing TORC Refinery property and TLC's ROWs. At a minimum, such a study should identify all of the work that would be required to ensure TORC's Refinery's and TLC's ROWs' ongoing compliance with environmental, emergency response, safety, and related requirements, if the Proposed Project were to require an easement or acquisition for an access road or any other encroachment through the affected area. The results of this study should be shared with TORC, TLC, and the public and fully incorporated into any future revised DEIR, along with an analysis of the potential impacts of the work required and the potential alternatives to the Proposed Project that could mitigate or avoid these issues and impacts.

139-3

II. The Project Has Not Addressed Potential Impacts to Passengers from Proximity to Emergency Flares and Other Industrial Equipment on a Rail Line Previously Used Only for Freight

The DEIR also lacks any analysis of potential impacts on prospective rail passengers from proximity to the TORC Refinery's tank farm, emergency flares, and other area industrial operations. As Metro knows, rail line running through this area is currently used only for commercial freight. As noted above, the portion of the rail line immediately adjacent to the Refinery is located within approximately 420 feet of the Refinery's tank farm and within approximately 1,000 feet of the Refinery's two main emergency flares. The nearest tanks contain large volumes of petroleum products. Any future incident that might occur involving the flares and/or these tanks would create safety concerns for persons and equipment in the area, potentially requiring evacuation of the area. Given its proximity, those safety considerations also would have an impact on the Project's proposed adjacent rail line.

139-4

The Refinery flares, which rise 200 feet above the Refinery, are designed to safely combust excess flammable Refinery gas in the event of an emergency or necessary equipment maintenance. When operating, these flares can emit radiant heat of approximately two (2) kilowatts per square meter (kW/m²), requiring Refinery employees and contractors to follow safety precautions to vacate the area during their operation.

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Again, the proximity of the proposed adjacent rail line requires that Metro revise the DEIR to address these safety considerations. We are concerned that the DEIR has not even attempted to analyze whether and how passengers on the Project's proposed route nearest to the Refinery may be adversely impacted by an incident at the tank farm and/or potential operation of the flares. Metro must amend the DEIR to assess these potential impacts.²

Notably, the City in its EIR for the Del Amo Boulevard extension project did analyze the potential radiant heat impacts of the Refinery's flares. The City included as an important project mitigation a physical barrier at Crenshaw and Del Amo Boulevards that could be lowered to prevent vehicular and pedestrian traffic along the north side of Del Amo Boulevard from getting near the flares if activated. As further mitigation, the project did not include a sidewalk or bike lane on the north side of Del Amo Boulevard, which is closest to the Refinery, to further prevent pedestrian and bike traffic from being exposed if the flares were activated. None of these types of potential mitigation have been considered as part of the Proposed Project.

139-4

Again, as discussed above, TORC urges Metro to engage a third-party expert to assess the potential impacts to rail passengers associated with the Proposed Project's close proximity to the Refinery's tank farm, flares, and other industrial equipment, along with potential alternatives to mitigate or avoid those impacts. The results of this study should be incorporated into a revised and recirculated DEIR for further review and comment by the public before Metro proceeds with the Proposed Project.

III. The Project Has Not Addressed Other Potential Impacts Related to Security, Safety, Land Use, Etc.

In addition to failing to address the issues and impacts addressed above, the DEIR also fails to analyze other potential impacts related to security, safety, land use, etc., due to the Proposed Project's close proximity to the Refinery.

Regarding security, the Refinery is subject to the Chemical Facility Anti-Terrorism Standards and Protecting and Securing Chemical Facilities from Terrorist Attacks Act. Under these regulations administered by Homeland Security, TORC has undertaken certain security precautions to keep the Refinery secure and safe for employees, contractors, and the community. Currently, the DEIR does not analyze the potential security impacts and risks of the Proposed Project's rail line to the Refinery and its ability to comply with these regulations.

139-5

Regarding safety, the Refinery is subject to state and federal Risk Management Practices regulations. Under these regulations, administered by the California Office of Emergency

² In the context of this additional impact analysis, Metro also should consider potential safety and other impacts in the event of a train derailment in close proximity to this section of the Refinery.

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Services on the state level and the U.S. Environmental Protection Agency on the federal level, TORC has undertaken required impact analyses for certain materials used in its operations. These analyses are used by various local, state, and federal agencies for planning purposes to determine the appropriate level of response needed in the event of an incident. The DEIR does not analyze how these agencies' planning or response may be impacted by the Proposed Project.

Regarding land use, the Refinery is zoned M2-Heavy Industrial under the City's Zoning Ordinance and General Plan. Under the City's zoning, certain setback requirements may be applicable to the Refinery's boundary, which could apply in the area of the Proposed Project's access road. The DEIR does not analyze how the City's zoning requirements could impact applicable setback requirements associated with the proposed access road.

Again, as discussed above, TORC urges Metro to engage a third-party expert to assess the potential security, safety, land use, and other impacts, along with potential alternatives to mitigate or avoid those impacts. The results of this study should be incorporated into a revised and recirculated DEIR for further review and comment by the public before Metro proceeds with the Proposed Project.

IV. The Proposed Timeline for Selection of a Project Alternative is Unrealistic and Disregards the Time Needed to Address the Important Potential Impacts Discussed Above

Finally, the DEIR notes that Metro staff intend to present a final recommendation on their Proposed Project route(s) alignment by Spring 2023, ostensibly as part of or a prelude to issuance of a Final EIR. TORC believes that the issues identified above are both challenging and complex. But these impacts must be addressed now. They are reasonably foreseeable and significant, and their analysis (and analysis of potential mitigation measures) cannot be "piecemealed" or deferred to a later date. See Cal. Pub. Res. Code § 21065; CEQA Guidelines §§ 15126.4(a)(1)(B), 15378(a). While TORC stands ready to work cooperatively and collaboratively with Metro staff in assessing the impacts related to the Proposed Project's proximity to TORC's Refinery property and operations and TLC's ROWs, the full picture of potential impacts from the Proposed Project simply will not be known by this spring. TORC urges Metro staff to undertake a full and fair analysis of all the Proposed Project's potential impacts, and not cut this process short to meet artificial or unrealistic deadlines.

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Again, TORC appreciates the opportunity to provide these comments on the Proposed Project. Despite the concerns outlined above, we remain ready and willing to engage with Metro staff to address these concerns and assess the full range of the Proposed Project's potential impacts, alternatives, and mitigation measures to alleviate or avoid these impacts.

Very truly yours,

A handwritten signature in blue ink that reads "Sara C. Wilson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Sara Wilson
Refinery Manager

cc: John Sakers
Barbara Graham