Submission 8

Torrance Logistics Company LLC

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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 withing 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 8-1

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

our employees, operations, contractors, and surrounding community and environment that have not been adequately reviewed and addressed in the DEIR. 8-1

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. 8-2

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. 8-3

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. 8-4

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

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. 8-4

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 significate 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. 8-5

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

a revised and recirculated DEIR for further review and comment by the public before Metro proceeds with the Proposed Project. 8-5

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. 8-6

* * *

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

SOUTH BAY CITIES
COUNCIL OF GOVERNMENTS

SPEAKER REQUEST FORM

If you wish to speak to the Board of the South Bay Cities Council of Governments (SBCCOG) on any item, please fill out this card and turn it in to the Secretary. When your name is called, step to the front, state your name, residence, and the organization you represent (if appropriate) and start your remarks.

Please limit your comments to 3 minutes.

Agenda Item No. C Line **Date:**

Name: Annette Owens **Telephone:**

Address: **City, State:** Lawndale, **ZIP:**

Comments:

Signature:

Thank you for your interest and participation!

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Please limit your comments to 3 minutes.

Agenda Item No. **Date:** 12/8/25

Name: KEVIN TITCHEL **Telephone:**

Address: 1302 FIRMONA **City, State:** CA 90278 **ZIP:**

Comments:

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Signature:

Thank you for your interest and participation!

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Agenda Item No. C/K Line Ext **Date:** 12-8-25

Name: Adam Schwartz **Telephone:** 310-403-7030

Address: _____ **City, State:** _____, _____ **ZIP:** _____

Comments: Build it!

Signature: _____

Thank you for your interest and participation!

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Agenda Item No. Public **Date:** 12/8/25

Name: Niki Negrete-Mitchell **Telephone:** 310 387 4875

Address: 1302 Furmona Ave **City, State:** RB, _____ **ZIP:** 90278

Comments: re: C-Line FEIR

Signature: [illegible]

Thank you for your interest and participation!

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Please limit your comments to 3 minutes.

Agenda Item No. C the Extension **Date:** _____

Name: Brianna Egan **Telephone:** _____

Address: _____ **City, State:** Redondo Beach, _____ **ZIP:** _____

Comments: _____

Signature: _____

Thank you for your interest and participation!

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Agenda Item No. C Line **Date:** 12/8/25

Name: Kim Turner **Telephone:** 310-625-6224

Address: 20500 Madrona Ave **City, State:** Torrance, CA **ZIP:** 90503

Comments: _____

Signature: _____

Thank you for your interest and participation!

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Please limit your comments to 3 minutes.

Agenda Item No. CLINE EXT TO TORRANCE **Date:** 12/8/25

Name: RAY HOLLAR **Telephone:**

Address: **City, State:** LAWNDALE, **ZIP:** 90260

Comments: ADDED ITEM FROM TRANSPORTATION COMMITTEE

Signature:

Thank you for your interest and participation!

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Please limit your comments to 3 minutes.

Agenda Item No. Cline **Date:**

Name: Chelsea Schreiber **Telephone:**

Address: **City, State:** Lundale, **ZIP:**

Comments:

Signature:

Thank you for your interest and participation!

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Agenda Item No. C/K Line Ext **Date:** 12-8-2025

Name: Devon Hollenbeck **Telephone:** 925 819 2902

Address: 905 Anita St **City, State:** Redondo Beach CA **ZIP:** 90278

Comments: strong support for ROW!

Signature:

Thank you for your interest and participation!

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Please limit your comments to 3 minutes.

Agenda Item No. C/K LINE **Date:** 12/8/25

Name: DAVID MACH **Telephone:** (310) 618 3030

Address: **City, State:** **ZIP:**

Comments:

Signature:

Thank you for your interest and participation!

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Please limit your comments to 3 minutes.

Agenda Item No. C Line ext. **Date:** 12/8/25

Name: Andrew Blackney **Telephone:**

Address: **City, State:** Lawndale, CA **ZIP:** 90260

Comments:

Signature:

Thank you for your interest and participation!

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Please limit your comments to 3 minutes.

Agenda Item No. CLINE **Date:** 12-8-25

Name: Jimmy GOW **Telephone:** 424 571 2468

Address: PO Box 147 **City, State:** TORR, **ZIP:** 90504

Comments: SUPPORT

Signature:

Thank you for your interest and participation!

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Please limit your comments to 3 minutes.

Agenda Item No. C-1 & 2 **Date:** _____

Name: Holly Osborne **Telephone:** _____

Address: _____ **City, State:** _____, _____ **ZIP:** _____

Comments: _____

Signature: Holly Osborne

Thank you for your interest and participation!

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Please limit your comments to 3 minutes.

Agenda Item No. C/K Lim **Date:** 12/8/2025

Name: Allen Nation **Telephone:** _____

Address: 1030 S. Walker Apt 8 **City, State:** San Pedro, _____ **ZIP:** 90731

Comments: Public Comment.

Signature: [signature]

Thank you for your interest and participation!