

**DOCKETED**

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**Metro**

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Metropolitan Transportation Authority

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March 4, 2026

Lisa Worrall  
California Energy Commission  
715 P Street, MS 40  
Sacramento, CA 95814  
Submitted Electronically: Docket Log 25-OPT-02

RE: Prairie Song Reliability Project – State Clearinghouse No. 2026020074  
Notice of Preparation of Draft Environmental Impact Report (DEIR)

Dear Ms. Worrall:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Prairie Song Reliability Project (Project) located in the unincorporated community of Acton in Los Angeles County (County). Metro's mission is to provide a world-class transportation system that enhances quality of life for all who live, work, and play within Los Angeles County. As the County's mass transportation planner, builder and operator, Metro is constantly working to deliver a regional system that supports increased transportation options and associated benefits, such as improved mobility options, air quality, health and safety, and access to opportunities.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Draft Environmental Impact Report (DEIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the Metro-owned right-of-way (ROW) operated and maintained by the Southern California Regional Rail Authority (SCRRA) to run the Metrolink commuter rail service, which should be analyzed in the DEIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.<sup>1</sup>

**Project Description**

The Project is to construct a 1,150-megawatt (MW) battery energy storage system that would be constructed on privately owned land. The development includes the containerized battery energy storage system with fire prevention systems, a substation, inverters, and other operation and maintenance facilities. The project would connect to the existing Southern California Edison (SCE) Vincent Substation via either a 1.1-mile or a 1.8-mile generation intertie (gen-tie) line route, installed overhead using monopoles and steel lattice towers. Prairie Song Reliability Project LLC is the Project Sponsor.

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<sup>1</sup> See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

## Recommendations for DEIR Scope and Content

### *Responsible Agency Status*

The Project proposes to construct overhead gen-tie lines and underground fiber optic lines across Metro-owned ROW. The Project Sponsor's use of Metro-owned right of way (fee property) is subject to approval of a license agreement by Metro, which is a discretionary action subject to CEQA review. Per Section 15381 of the CEQA Guidelines (14 Cal. Code of Regulations, div. 6, ch. 3), a "Responsible Agency" is "a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." Therefore, Metro anticipates that it will be a Responsible Agency for purposes of the preparation of this EIR and may rely on the EIR for its future CEQA findings supporting any of Metro's approvals.

### *Metrolink Adjacency*

1. **Operations:** The Project site is adjacent to Metro-owned ROW operated and maintained by the Southern California Regional Rail Authority (SCRRA) to run the Metrolink commuter rail service. The Project Sponsor is advised that rail service operates in both directions and that trains may operate 24 hours a day, seven days a week, in the ROW adjacent to the Project.
2. **Impact Analysis:** Due to the Project's proximity to Metrolink ROW, the DEIR must analyze potential effects on rail operations and identify mitigation measures as appropriate. Critical impacts to be studied should include (without limitation): impacts of Project construction and operation on and potential damage to the structural and systems integrity of tracks and related infrastructure; disruption to rail service; rail crossing safety for pedestrians and vehicles; and noise and vibration. Specific impacts and mitigation measures that should be studied include:
  - a. **Gen-Tie and Fiber Optic Lines:** The Project proposes to construct overhead gen-tie lines and underground fiber optic lines across Metrolink ROW. The construction and long-term maintenance of both the overhead gen-tie lines and fiber optic lines have the potential to impact Metrolink rail infrastructure and disrupt rail operations. Metro requests that the Project install all gen-tie and fiber optic cables underground using trenchless directional-bore drilling below the rail tracks.
  - b. **Structure Setback:** Structures such as transmission poles and other equipment that are immediately adjacent to the railroad ROW can pose safety hazards and may disrupt transit service and/or damage Metrolink infrastructure. Such conflicts can occur during Project construction and/or operation. The Project Sponsor will generally not be permitted to access Metrolink ROW to maintain Project infrastructure.
3. **Recommended mitigation measures:** The following actions suggested below should be used at a minimum to develop mitigation measures to address the above-noted impacts:
  - a. **Technical Review:** The Project Sponsor shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to the Metrolink Antelope Valley Line in relationship to the Project. Before issuance of any construction permit for the Project, the Project Sponsor shall obtain SCRRA's approval of final construction drawings.
  - b. **Setback:** Where the Project property is immediately adjacent to Metrolink ROW (owned by Metro), all Project structures shall be set back five a minimum of five (5) feet from property line to allow adequate space for property maintenance.
  - c. **Access:** Any access to railroad property is strictly at the discretion of Metro and SCRRA. Before issuance of any building permit for the project, the Project Sponsor shall obtain specific Right-

of-Entry temporary access permits from SCRRRA for any work performed on the Project's structures or property requiring access to the railroad ROW, and a license agreement from Metro for any permanent overhead or underground encroachment of railroad ROW. Where feasible, the Project Sponsor shall maintain fencing and walls at or near property lines from the private property side.

- d. Construction Monitoring: The Project Sponsor shall permit Metro and/or SCRRRA staff to monitor construction activity to ascertain any impact to the ROW. During construction, the Project Sponsor shall construct a protection barrier to prevent objects, material, or debris from falling onto the ROW. The Project Sponsor shall notify Metro and SCRRRA of any changes to the construction/building plans that may or may not impact the ROW.
4. Advisories to Project Sponsor: The Project Sponsor is encouraged to contact Metro Development Review and Metrolink staff early in the design process to address potential impacts. The Project Sponsor should also be advised of the following:
- a. Occupational Safety and Health Administration (OSHA) Requirements: Demolition, construction and/or excavation work in proximity to Metrolink ROW with potential to damage rail tracks and related infrastructure may be subject to additional OSHA safety requirements.
  - b. Technical Review: Metro and SCRRRA charge for staff time spent on engineering review and construction monitoring.
  - c. ROW Access: The Project Sponsor should contact SCRRRA for construction Right-of Entry requirements. Information can be found at [www.metrolinktrains.com](http://www.metrolinktrains.com). Once the Project plans are approved by SCRRRA, the Project will be forwarded to Metro for processing of a license agreement.
  - d. Cost of Impacts: The Project Sponsor will be responsible for costs incurred by Metro and/or SCRRRA due to Project construction/operation issues that cause delay or harm to Metrolink service delivery or infrastructure. The Project Sponsor will also bear all costs for any noise mitigation required for the Project.

If you have any questions regarding this letter, please contact me by phone at 213.418.3484, by email at [DevReview@metro.net](mailto:DevReview@metro.net), or by mail at the following address:

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One Gateway Plaza  
MS 99-22-1  
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Sincerely,

Shine Ling, AICP  
Senior Director, Development Review Team  
Countywide Planning and Development Department