Attachment B

Summary of Comments and Responses to Comments on the Final Environmental Impact Statement/Environmental Impact Report (FEIS/FEIR).

The FEIS/FEIR Notice of Availability (NOA) for the East San Fernando Valley Transit Corridor Project (ESFVTC Project or Project) was published in the Federal Register on October 2, 2020 (*Federal Register, Vol. 85, No.* 192) and English and Spanish versions of the NOA were distributed to approximately 115 agencies, elected officials, and interested parties and organizations in the Project study are. The NOA was also published in four local newspapers including in Spanish in the local Spanish language newspaper and an eblast announcing the availability of the FEIS/FEIR and two public information meetings was sent to over 4,000 individuals included in LACMTA's Project stakeholder database. The NOA and electronic copies of the FEIS/FEIR were also mailed to 17 public agencies that submitted comments on the DEIS/DEIR and an electronic version of the FEIS/FEIR was made available on LACTMA's Project website.

The FEIS/FEIR was made available for public review from October 2, 2020 to November 17, 2020. The public comments received during the public review period and responses to those comments are summarized below and on the following pages.

Public Comments on the FEIS/FEIR Received during the Public Review Period

During the 45-day public review period, emails and letters from approximately 180 individuals, organizations, and public agencies containing more than 250 individual comments were received. A number of these comments were similar to comments submitted on the DEIS/DEIR (which were responded to in the FEIS/FEIR) or raised issues or concerns similar to those expressed in the public agency comments summarized above. New comments largely concerned the potential phasing of the Project, i.e., construction of an Initial Operation Segment (IOS), and the impacts of the IOS, in particular impacts that could occur at the northern end of the IOS at the Van Nuys Boulevard and San Fernando Road intersection. FTA has considered the duplicative comments and the new comments before making the decision presented in the ROD.

The public comments focused on the following issues:

Traffic Circulation and Access Impacts. Public commenters expressed concerns about the removal of travel lanes and turn restrictions on Van Nuys Boulevard resulting in additional congestion and traffic delay and increased cut-through traffic in local neighborhoods.

> Response. The FEIS/FEIR acknowledged that the removal of travel lanes and turn restrictions along Van Nuys Boulevard could result in localized traffic impacts. However, no feasible mitigation measures were identified that would reduce or minimize those impacts (note: in order to mitigate traffic impacts at local intersections, acquisition of additional right-of-way would be required to provide additional through or turn lanes; acquisition of right-of-way to mitigate traffic impacts was not considered feasible because it is inconsistent with current LACMTA and City of Los Angeles Department of Transportation policies). Also, please see the response (in the Agency Comments section) to the City of San Fernando's concerns about traffic impacts due to at-grade crossings of the railroad right-of-way. As noted in that response, the LACMTA Board has directed staff to conduct additional studies including a traffic study to address the City's concerns. The scope of the studies will be identified and/or coordinated with the City of San Fernando and the studies are expected to commence in the summer of 2021 and continue into 2022. LACMTA will continue to coordinate with FTA regarding the

recommendations in those studies including the potential environmental effects of any recommended Project design changes.

The loss of travel lanes will result in the diversion of vehicular trips to other corridors and nearby roadways including those in neighborhoods adjacent to the Van Nuys Boulevard corridor. Although cut-through traffic is not considered to be a substantial adverse effect or significant impact, the amount of redistributed vehicle trips to nearby local streets will be evaluated after the LRT begins operation in 2028. At that time neighborhood traffic management measures, if warranted, will be considered by the City of Los Angeles.

Bicycle and Pedestrian Circulation. Public commenters expressed opposition to removal of bike lanes and concerns about the impact on pedestrian circulation due to closure of minor street crossings and narrowing of sidewalks at some locations along Van Nuys Boulevard.

Response. The LACMTA Board of Directors passed a motion at the December 3rd Board meeting directing staff, in coordination with the City of Los Angeles, to identify a preferred First/Last Mile (FLM) Plan parallel bike route to replace the existing bike lanes on Van Nuys Boulevard and report back with a plan to provide the replacement lanes by the time of the opening of the ESFVTC Project. The motion passed by the Board also directs staff to return to the Board with recommendations for next steps following the completion of the FLM Guidelines, which are anticipated to be considered by the LACMTA Board in the spring of 2021. The FLM Guidelines will formalize standards and processes, including roles and responsibilities, for advancing FLM improvements alongside transit corridor delivery. Implementation of the FLM Plan under the forthcoming Guidelines will be a partnership effort between LACMTA and local agencies.

LACMTA will continue to consult with the City of Los Angeles Departments of Transportation and City Planning through the final design phase of the Project to determine appropriate sidewalk widths to ensure safe and convenient pedestrian circulation.

Parking. Public commenters stated their concerns or opposition to removal of parking along Van Nuys Boulevard and the resulting economic impacts on local businesses and local traffic circulation.

Response. A parking study was prepared that evaluated the loss of on-street parking along Van Nuys Boulevard. The results of the study, which were included in the DEIS/DEIR and FEIS/FEIR, showed parking capacity via off-street public parking lots, off-street commercial lots, and on-street blocks adjacent to Van Nuys Boulevard could accommodate the loss of these parking spaces.

The loss of travel lanes and removal of parking along Van Nuys Boulevard will result in the diversion of vehicular trips to other corridors and nearby roadways. The amount of redistributed vehicle trips to nearby local streets (cut-through traffic) will be evaluated after the LRT begins operation. At that time, neighborhood traffic management measures, if warranted, will be considered by the City of Los Angeles.

Air Quality Impacts. Public comments included concerns about air quality impacts due to additional delay and vehicle idling at intersections.

Response. As stated in the FEIS/FEIR, the Project will not result in significant localized air quality impacts. This will be primarily due to the fact that vehicle emissions will diminish in future years because (1) new vehicles must meet more stringent emissions standards, and (2) older, more polluting vehicles will gradually retire from the vehicle fleet. Additional state regulations, such as the recently adopted Advanced Clean Truck Rule, will also reduce idle emissions. Nonetheless, should Project changes identified during final design have the potential to result in additional emissions, further environmental analysis or a re-evaluation may be conducted in accordance with federal environmental regulations. Also, see the responses to the City of San Fernando's comments in the Agency Comments section.

Right-of-Way Impacts. A number of commenters enquired whether their properties would be acquired or asked questions about LACMTA's right-of-way acquisition procedures and schedule.

Response. LACMTA has responded directly to individual enquiries from property owners via email or phone, provided property acquisition information in the formal presentations and during the Question & Answer sessions at the two FEIS/FEIR public information meetings, and posted a Metro Property Acquisition Fact Sheet on their website at: https://media.metro.net/projects_studies/images/factsheet_propertyacquisition_2014.pdf.

Project Phasing. Concerns were expressed and questions asked about potential additional impacts due to phasing the Project, including additional operational air quality and traffic impacts at the northern end of the IOS segment where Van Nuys Boulevard intersects San Fernando Road.

Response. The FEIS/FEIR evaluated the environmental effects of constructing the LPA and phasing the Project, i.e., construction of an IOS that would extend from the Metro G Line on the south to the Van Nuys Boulevard/San Fernando Road intersection on the north. The IOS was included in the FEIS/FEIR to avoid delays due to the timing of funding availability and to enable Metro to realize potential cost savings, which would not otherwise occur under the LPA, from phasing the Project. Proceeding with an IOS for the Project will also allow further coordination to occur with the Public Utilities Commission (PUC) and Metrolink, which will be necessary to accommodate double tracking of the Antelope Valley Line, and with the City of San Fernando regarding their concerns (see Public Agency comments section), prior to development of the remaining northern segment (phase 2) of the LPA. The analyses in the FEIS/FEIR concluded that the IOS would result in no new substantial adverse effects compared to those identified for the LPA. Nonetheless, should changes to the IOS alignment occur, including the station location at the Van Nuys Boulevard/San Fernando Road intersection, additional environmental analyses may be conducted to determine if new effects could occur.

LPA Design Features and Operating Characteristics. Comments or questions concerning the Project limits, project alignment including the need for and the impacts of the "curve" where the alignment transitions from Van Nuys Boulevard to the railroad right-of-way, the number and location of stations, "slow" train speeds and the need for signal prioritization, and preferences for at-grade or grade separated alignment were raised.

Response. As a result of the planning and environmental studies conducted over the past 9 years, LACMTA determined that constructing the LPA (in phases) would best meet the Project's purpose and need and Project objectives. However, further refinements to the Project

alignment and design features may occur during final design and construction to address public and agency concerns and as result of additional studies that the LACMTA Board has committed to conducting. LACMTA will continue to consult with FTA regarding changes to the Project design, and LACMTA, in consultation with FTA, will determine what additional environmental analyses, if any, will be required to address those changes.

With regards to the curve and station where the alignment transitions from Van Nuys Boulevard to the railroad right-of-way, during the advanced conceptual engineering (ACE) phase of the Project, several station schemes/locations were considered for the station including the center of Van Nuys Boulevard and the Metrolink railroad right-of-way adjacent to San Fernando Road. These station design schemes resulted in significant challenges to traffic operations on Van Nuys Boulevard and San Fernando Road, bicycle and pedestrian safety and mobility, and the need to relocate Metro bus stops for Lines 233 and 744. However, in response to public concerns as well as those of the City of San Fernando and SCRRA (see Agency Comments section), the Metro Board, at their December 3rd Board meeting, directed staff to address new issues raised along the 2.5-mile shared railroad right-of-way including potential grade separations at the Van Nuys Boulevard/San Fernando Road intersection and at other locations along the railroad right-of-way. Any supplemental environmental analysis, design evaluations, and associated traffic analysis along the 2.5-mile shared railroad right-of-way will be completed before proceeding with any construction activities on the railroad section of the alignment.

Project and Construction Schedule. Questions about the Project construction schedule, timing, and locations were raised by a number of commenters.

Response. LACMTA plans to start the Design Build (DB) procurement process in 2021 and award a DB contract in March of 2022. LACMTA anticipates construction starting on the south end of the alignment along Van Nuys Boulevard and continuing north. Construction will take approximately 6 years and will include the track, stations, systems, maintenance and storage facility, and street improvements required to complete the Project.

Agency Comments Received on the FEIS/FEIR during the Public Review Period

The Federal Transit Administration (FTA) received seven (7) letters and emails from federal, state, and local agencies commenting on the FEIS/FEIR.

U.S. Environmental Protection Agency (EPA). The EPA comment letter acknowledged the fact and expressed their appreciation that the air quality mitigation measures they recommended in their 10/12/17 comment letter on the DEIS/DEIR have been incorporated in the FEIS/FEIR.

California Department of Transportation, Caltrans District 7. Caltrans stated that careful coordination is required with Caltrans during final design to address access changes to freeway ramps to I-5 and to determine if mitigation is required.

Response. LACMTA will continue to coordinate with Caltrans and other affected agencies through final design and construction of the Project.

Caltrans also stated that an analysis of the visual impact of the Project from the highway user point of view should be analyzed.

Response. Given that the proposed ESFVTC LRT will be at-grade in a densely developed urban corridor, the maximum height of the tallest Project structures (overhead catenary system poles) will be 30 feet, and the fact that the highway users view of the LRT line will be limited and fleeting (the alignment crosses under the I-5 freeway and SR 118), no substantial adverse visual effects on highway users will occur.

Caltrans also noted two figures that appear to be duplicated in Section 4.5 of the FEIS/FEIR.

Response. Figure 4.5-12, was inadvertently duplicated. The correction is noted for the record.

They also suggested adding text to mitigation measure MM-HAZ-6 stating that "A Phase I Environmental Site Assessment and Investigation should identify hazardous sites that could affect design and construction."

Response. LACMTA will conduct additional site investigations as noted in the FEIS/FEIR and as required in accordance with all applicable regulations to determine the extent of soil or groundwater contamination in areas that may be disturbed by construction activities.

California Public Utilities Commission (CPUC). CPUC expressed concerns about the elimination of the subway segment, which results in numerous at-grade crossings on Van Nuys Boulevard and the potential for vehicle-train collisions. They also commented that the addition of two tracks to single-track crossings on the railroad corridor adjacent to San Fernando Road has significant safety implications and therefore additional evaluation is needed and they recommended that LACMTA focus on the Initial Operating Segment (IOS) until the complexities of the shared railroad corridor segment can be thoroughly evaluated.

Response. LACMTA, has stated in response that the lessons learned from previous LACMTA construction LRT projects and new safety equipment will be an integral project component and; therefore, the ESFVTC Project could safely cross intersections at grade. Also see the responses to the Southern California Regional Rail Authority (SCRRA) and City of San Fernando comment letters below regarding the railroad right-of-way and safety.

Southern California Regional Rail Authority. SCRRA proposed that the Locally Preferred Alternative be refined to a funded IOS to allow sufficient time to address Project development and right-of-way issues that occur due to the constrained railroad right-of-way that would be shared both by Metrolink and the ESFVTC LRT trains. They also stated that LACMTA should analyze the right-of-way and safety impacts of the ultimate condition in the railroad corridor of two LRT tracks and two Metrolink tracks (Metrolink has approved the addition of a second track in this segment of the corridor) and consider grade-separated options, additional analysis of connection alternatives between the Metrolink Antelope Valley Line and the ESFVTC Project and building an FRA-compliant light rail transit line. Additionally, SCRRA suggested that the proposed station on Van Nuys Boulevard near the Metrolink Ventura Line be moved closer or revised to provide improved pedestrian connections. Lastly, SCRRA stated that parking should be reserved for Metrolink riders at Metrolink stations near the ESFVTC line.

Response. In response, the LACMTA Board has instructed staff to work with SCRRA (and the City of San Fernando) to address new issues raised along the 2.5-mile shared railroad right-of-way and conduct supplemental environmental analysis, design evaluations, and associated traffic analysis, as needed. Any supplemental environmental analysis, design evaluations, and

associated traffic analysis along the 2.5-mile shared railroad right-of-way will be completed before proceeding with any construction activities on the railroad section of the alignment. Additionally, LACMTA will continue to consult with FTA regarding the recommendations in those future studies and the need for additional environmental analysis of proposed design changes.

With regards to revisions to the location of the station near the Metrolink Ventura Antelope Ventura Line, LACMTA will continue to consult with SCRRA regarding the location of that station and will make revisions as appropriate during the final design phase of the Project to improve pedestrian connections.

Los Angeles County Department of Public Works (LACDPW). LACDPW noted that Project components affecting Los Angeles County Flood Control District (LACFCD) facilities or right-of-way will require a permit from the County's Public Works, Land Division and that the County and LACMTA are exploring further alternatives due to placement of the LRT over LACFCD storm drains.

Response. LACMTA will continue to consult with the County and will obtain all necessary permits.

Los Angeles County Sheriff's Department. The Sheriff's Department noted that LACMTA does not currently have a security contract with LACMTA to provide law enforcement services for the proposed ESFVTC line. They also noted that the crime statistics in the FEIS/FEIR are three years old and LACMTA should consult with the Department regarding recent crime statistics.

Response. Consultation with the Sheriff's Department is ongoing.

City of Los Angeles, Bureau of Engineering (LABOE). LABOE proposed several minor revisions or corrections to the text of the FEIS/FEIR including the specific weekday AM and PM peak hours when construction shall be minimized. LABOE also stated that given the duration of construction, the length of the corridor, and volume of construction activities, per recent City policy, a health risk assessment to determine impacts on nearby residential uses and adequacy of proposed mitigation measures should be conducted.

Response. The FEIS/FEIR states that accurately quantifying diesel particulate emissions to determine health risks requires detailed site-specific information on the locations of specific construction activity including timing and locations of individual equipment and vehicles. Although that information is not currently available, the FEIS/FEIR acknowledges (see page 4.6-21 of the FEIS/FEIR) that the greatest potential for diesel particulate matter (DPM) emissions will occur when the maintenance and storage facility (MSF) and track/station installation are undertaken. With the exception of single-family residences located across the Pacoima Wash near the southwest corner of the MSF, there are no residences located in close proximity to the MSF. Additionally, construction activities will likely occur sequentially along the Project alignment so that not one location experiences emissions from nearby construction activities over a long period of time. It should also be noted that the Project is not considered a Project of Air Quality Concern as defined in USEPA's Transportation Conformity Guidance. Therefore, the Project does not require quantitative dispersion modeling for particulate matter (PM) and project-level (PM) conformity determination requirements are satisfied.

LABOE also stated that narrowing of sidewalks, which may occur in some locations, would be inconsistent with City policies, i.e., Complete Streets Design Guidelines.

> Response. LACMTA has and will continue to consult with the City of Los Angeles Departments of Transportation and City Planning regarding sidewalk widths and other roadway configuration design issues. Additionally, LABOE noted that Nuys Boulevard is within a High Injury Network and asked how the Project would the Mayor's Vision Zero policies to end traffic deaths in Los Angeles. Section 4.14-Safety & Security of the FEIS/FEIR identifies safety measures including design elements that will be incorporated in the Project and proposed mitigation measures, which include a commitment to continue consultation with various City departments throughout the final design and construction phases of the Project.

City of Los Angeles, City Council President Nury Martinez (6th District) and Councilwoman Monica Rodriguez (7th District). The council members provided comments on a number of topics addressed in the FEIS/FEIR including: Transportation, Transit, Circulation & Parking Construction; Real Estate & Acquisitions; Land Use; Irreversible and Irretrievable Commitments of Resources; Scenic Vistas; Environmental Justice; Project Phasing/IOS; and Community Engagement. They also provided comments on ways to provide additional support for affected businesses and job creation.

With regards to traffic and pedestrian bicycle circulation, the council members noted that the removal of 15 traffic signals and closure of minor intersections would result in longer pedestrian routes and may result in some traffic shifts to parallel corridors. As a consequence, they recommended expanding mitigation measures by adding text to MM-TRA-1 through MM-TRA-6 that will require LACMTA to: commit funding to ensure the First/Last Mile (FLM) Plan improvements are implemented; fund the creation of a Streetscape Plan for Van Nuys Boulevard; work with LADOT to ensure pedestrian safety; and convert portions of Van Nuys Boulevard and San Fernando Road into green corridors with enhanced pedestrian and bike infrastructure. They also proposed LACMTA provide funding for the construction of a linear park and Class I bikeway along the Pacoima Wash and Old Pacoima Wash to mitigate the loss of bike lanes along Van Nuys Boulevard.

> Response. The LACMTA Board of Directors passed a motion at the December 3rd Board meeting directing staff, in coordination with the City of Los Angeles, to identify a preferred FLM parallel bike route to replace the existing bike lanes on Van Nuys Boulevard and report back with plan to provide the replacement lanes by the time of the opening of the ESFVTC Project. The motion passed by the Board also directs staff to return to the Board with recommendations for next steps following the completion of the FLM Guidelines, which are anticipated to be considered by the LACMTA Board in the spring of 2021. The FLM Guidelines will formalize standards and processes, including roles and responsibilities, for advancing FLM improvements alongside transit corridor delivery. The implementation of FLM under the forthcoming Guidelines will be a partnership effort between LACMTA and local agencies.
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> With regards to the City's suggestion that the Pacoima Wash could be an alternate location for a Class I bike lane, LACMTA stated that because of the high cost and complexity of a Project of this size, a separate planning, conceptual engineering, and environmental review would be required. If the City decides to move forward on a Pacoima Wash bike path and linear park, LACMTA would welcome the opportunity to coordinate with relevant parties going forward and provide technical assistance with grant writing for this Project.

With regards to the need for safe pedestrian crossings, virtually all stations will have two entrances where pedestrians can cross the street, one for each end of the station and both controlled by a traffic signal. Because stations will be located at major intersections, one of the pedestrian crossings will be at the major cross-street, and the second pedestrian crossing will be located mid-block or at a secondary street intersection. By having crosswalks at these locations, LACMTA will be able to "channelize" or direct pedestrians to a safe location to cross the street. Additionally, a fence will be constructed along the rail right-of-way to ensure pedestrians do not cross the tracks at unsafe locations.

During construction of the ESFVTC Project, detour routes for motorists, bicyclists and pedestrians will be needed in certain areas. Detour routes will be developed in coordination with the community and stakeholders through the development of a traffic management plan (TMP). Permanent bike facilities will be implemented at the close of the construction period.

LACMTA has also noted that a number of the active transportation and streetscape suggestions in the comment letter are also eligible for local return and other LACMTA Transit Oriented Communities (TOC) resources and programs.

With regards to traffic and potential traffic shifts to parallel streets, the council members proposed adding text to MM-TRA-2 that will require LACMTA to conduct a traffic analysis to study the potential traffic shift into parallel corridors from the Woodman/Van Nuys Boulevard intersection, to the intersection at Van Nuys Boulevard/San Fernando Road and identify traffic calming measures.

Response. LACMTA will continue to work with the City Los Angeles Department of Transportation and local Council offices regarding the traffic impacts of the Project during both construction and operation to minimize those impacts to the extent feasible.

The council members also stated that parking loss should be considered both a business impact and potential environmental impact and they proposed mitigated parking impacts on local businesses due to removal of on-street parking along Van Nuys Boulevard by conducting a business parking gap analysis for the commercial nodes along the ESFVTC Project alignment as part of the next phase business engagement leading up to construction. The analysis should also identify measures that LACMTA will undertake to address the gaps such as leasing or constructing parking facilities and other measures.

Response. As noted in the comment, a parking study was conducted for the Project and determined that off-street or on-street parking in locations adjacent to Van Nuys Boulevard will be able to accommodate the Van Nuys Boulevard weekday and weekend parking demand. Nonetheless, LACMTA has stated that they are committed to working with the City to address this issue. Potential strategic parking management ideas that LACMTA is committed to exploring with the City include:

- Initiating a neighborhood parking protection strategic plan with parking policies such as a residential permit parking program and/or time limits to encourage turnover;
- Identifying shared use parking opportunities such as a nearby church parking lot that could be leased during weekdays;
- Identifying potential opportunities for angled parking conversion to increase the supply of parking;

- Developing a wayfinding signage program to indicate the location of public off-street parking lots;
- Encouraging and/or requiring developers to provide additional parking for public use.

In addition to the above, LACMTA will work with LADOT and the Council Office on the feasibility of preserving some on-street parking in Pacoima.

With regards to property acquisitions, the council members recommended engaging the community to identify potential uses for remnant parcels and implement proposed uses in a timely manner.

Response. LACMTA's Joint Development team is collaborating with the Project planning team to identify any property that may have long-term joint development potential. LACMTA's Joint Development policy and process foreground the need for community-based planning and ensuring the availability of affordable housing adjacent to transit.

The council members also proposed that LACMTA utilize its programs to help foster more transit-oriented land uses along the corridor and insulate residents from gentrification, including using the Transit Oriented Planning Grant Program to create Transit Neighborhood Plans for critical locations along the corridor and the Metro Affordable Transit Connected Housing (MATCH) program to assist with the development and preservation of affordable housing.

Response. LACMTA was pleased to partner with the City in the fall of 2020 to jointly submit a $1.5M grant application to the Federal Transit Administration's Pilot Program for Transit Oriented Development Planning. LACMTA is committed to a continued partnership with the City as they perform a corridor Baseline Assessment in partnership with Community Based Organizations (CBOs) to identify opportunities to equitably leverage transit investments and identify local risks, such as gentrification and displacement, and opportunities to address them. LACMTA will also continue to explore opportunities for value capture, whereby LACMTA, the City and the County can work together to leverage the value created by the transit investment in order to reinvest in corridor-level priorities and community benefits, many of which have been identified in the Council Offices' comment letter.

In addition to LACMTA TOC resources and programs previously described, MATCH revolving loan program is active and per program guidelines, upon completion of the ESFVTC Project environmental process, projects to support affordable housing preservation and development along the corridor will be eligible to access program funding.

Concerning irreversible and irretrievable commitment of resources, the council members stated that LACMTA should work with the Bureau of Sanitation and Streets LA to implement green infrastructure to capture and treat stormwater, improve air quality, and mitigate urban heat.

Response. The FEIS/FEIR Section 4.20 addresses Irreversible and Irretrievable Commitments of Resources and the effects were not found to be significant or adverse. Nonetheless, the Project includes Best Management Practices (BMPs) to capture and treat stormwater in accordance with the City of Los Angeles Low Impact Development (LID) requirements and Bureau of Sanitation and Engineering requirements. For the streets and track guideway, BMPs are proposed as screened catch basins and track drains in accordance with the Bureau of Engineering and LACMTA standards. Also, BMPs are required at each of LACMTA's acquisition

sites and include dry wells and bioswales at Traction Power Substations sites (TPSS) and a cistern at the Maintenance and Storage Facility (MSF) site.

The council members noted that FEIS/FEIR identified no measures to mitigate the visual impacts of the Overhead Catenary System (OCS) poles and wires. To address this issue, they proposed that LACMTA work with the Department of Water and Power (DWP) to underground existing utilities and establish a connection grant for small businesses. They also proposed using landscaping or public art, in consultation with the community, to conceal TPSS.

Response. LACMTA is working with DWP to address existing overheard electrical lines that do not meet the California Public Utilities Commission clearance requirements and will require raising, rerouting, or undergrounding. LACMTA will also consider, depending on the specifics of each TPSS site, providing landscaping that will separate each TPSS and adjacent sidewalk. Also, the FEIS/FEIR includes mitigation measures MM-VIS-2 and MM-VIS-3 that propose minimizing and preserving existing vegetation and trees, where feasible.

Regarding environmental justice, the council members stated that LACMTA must mitigate the noise, air quality, circulation, and visual impacts of the maintenance and storage facility (MSF) on nearby residents including constructing parks and open space as a buffer, providing funds to improve the facades of businesses and homes in the area, and implementing streetscape improvements in the area surrounding the MSF and providing improvements to the Raymer Street Bridge.

Response. The Project's MSF will be located on the Option B site identified in the FEIS/FEIR in an existing industrial and commercial area located west of Van Nuys Boulevard, north of Keswick Street, south of Raymer Avenue, and east of the Pacoima Wash. The MSF will provide light maintenance services for the LRT trains and consequently will not be substantially dissimilar to the existing industrial and commercial land uses that currently occupy the MSF site.

Appendix AA of the FEIS/FEIR includes the Environmental Justice Impact Report that was completed for the ESFVTC Project and supports the selection of Option B as the preferred MSF location. The Report found that the entire study area is made up of minority, low-income populations, and thus to minimize the number of people affected by right-of-way acquisitions in sensitive communities, LACMTA looked only at industrialized areas for MSF consideration. Of the three sites considered, only Option B received letters of support, including a letter of support from Council President Martinez, and only Option B had no direct adverse effects on residential properties. LACMTA is committed to working with affected business owners to relocate in a manner that results in as minimal disruption as possible.

The FEIS/FEIR analyzed the MSF location as it concerns emissions (Section 4.7), noise (Section 4.8) and traffic (Section 3.3). For these study areas, the analysis for the MSF did not identify significant impacts or adverse effects, and thus no mitigation measures are provided. Additionally, the residences on Saticoy are located approximately 300 feet south of the proposed MSF site and there are existing commercial and industrial uses occupying the area between the residences to the south and the proposed MSF to the north. Those buildings will provide both a sound and visual buffer or barrier between the MSF and residences on Saticoy.

In addition, the MSF footprint was minimized to limit disruption to existing businesses. The land that is acquired for the MSF will be fully utilized, and therefore there is no remnant property.

However, LACMTA acknowledges the concerns raised in the comment letter about the new MSF and commits to working with the Council Offices and the community on the design and edge conditions of the new facility, particularly with respect to landscaping and good urban design.

The FLM Plan for the Project considers active transportation projects, such as the Raymer Bridge within the 3-mile walkshed of the Project, and the implementation of the Plan within the forthcoming Guidelines will be a partnership with the City and the Council Offices. As part of early coordination, LACMTA has indicated their willingness to schedule either a virtual site visit, or when feasible based on public health guidelines, an in-person site visit to review the area together along with the issues the Council Offices have identified.

The council members stated that if the Project is phased with construction of an IOS, additional analysis will be necessary for the Van Nuys/San Fernando station terminus. That analysis should address but not be limited to station location, traffic and circulation, bicycle and pedestrian safety, real estate and acquisitions, parking as well as a new Metrolink station at Van Nuys Boulevard and San Fernando Road.

Response. A new Metrolink station is not part of the ESFVTC Project and thus was not analyzed in the FEIS/FEIR. The FEIS/FEIR did, however, analyze the environmental effects, including those identified by the council members, of both the LPA and an IOS, which includes a terminus station at Van Nuys Boulevard/San Fernando Road.

The council members requested a robust community outreach strategy for the construction planning phase, involving diverse stakeholders and including establishment of a Community Leadership Council for each neighborhood and canvassing door to door along the LRT alignment and surrounding radius to inform businesses and residents throughout the entirety of the Project.

Response. LACMTA has conducted, as described in the FEIS/FEIR, and will continue to conduct extensive outreach efforts through the final design and construction phases of the Project. LACMTA's Construction Relations & Mitigation Programs department is committed to implementing a comprehensive outreach and engagement program that builds sustainable partnerships with communities adversely affected by construction. LACMTA will implement robust public outreach including to businesses and residents, updates through regularly scheduled community meetings, briefings to elected officials, building relationships and updating local community organizations, mitigating construction effects, a Project hotline, electronic and door-to-door distribution of construction notices, and social media and media relations. Additionally, one of the tools that the LACMTA Construction Relations team uses is door-to-door canvassing along the alignment to businesses and residents to introduce the Project, provide Project updates on construction activities, and inform and engage local businesses in LACMTA's business mitigation programs.

Recognizing the importance of supporting small businesses during construction as vital to ensure economic sustainability of communities, in 2019 LACMTA's Board of Directors authorized the transition of the Pilot LACMTA Business Solution Center (BSC) to a permanent program and expanded the program to all upcoming light rail projects in the Measure M pipeline inclusive of

the ESFVTC Project. The regional expansion of LACMTA's BSC will provide immediate, hands-on technical assistance and business development services to small businesses along the corridor.

The council members also strongly recommended the implementation of a Business Interruption Fund similar to other LACMTA projects and a Transit Oriented Communities Small Business Loan Program to provide financial support to businesses adversely affected by construction activities.

Response. Recognizing the importance of supporting small businesses during construction as vital to ensure economic sustainability of communities, in 2019 LACMTA's Board of Directors authorized the transition of the Pilot BSC to a permanent program and expanded the program to all upcoming light rail projects in the Measure M pipeline inclusive of the ESFVTC Project. The regional expansion of LACMTA's BSC will provide immediate, hands-on technical assistance and business development services to small businesses along the corridor.

The council members stated they look forward to the job opportunities the Project will generate and identified ways to help LACMTA connect with the community to access those opportunities.

The City of San Fernando, Mayor Joel Fajado. The City expressed concerns about the level of impact that was studied in the EIS/EIR process including the: Project Definition, Safety Analysis, Vehicular and Traffic Circulation Analysis, Air Quality Analysis, and Acquisition of Public and Private Property.

The City claims that the "Project Definition" in the EIS/EIR should have included an analysis of a second Metrolink track that would be constructed as part of Brighton to Roxford Project and all environmental studies should be revised to consider a total of four tracks within the railroad right-of-way with 15-minute peak hour headways for Metrolink and 6-minute peak hour headways for the LACMTA LRT trains. According to the City, those additional analyses will show that the development of four tracks within the railroad right-of-way will result in significant impact on environmental conditions in San Fernando.

Response. The FEIS/FEIR did identify the Brighton to Roxford Project as a related project, see Table 2-3: Cumulative Projects in Chapter 2 – Project Description, and the cumulative effects of the related projects were evaluated to a reasonably foreseeable level of detail in the FEIS/FEIR, though to a lesser level of detail than the LPA. Nonetheless, LACMTA has committed to conducting future studies to address the City's concerns about the cumulative effects of the ESFVTC Project and the Brighton to Roxford Project. LACMTA will consult with the City regarding the scope of the studies that will be conducted to address the City's concerns, LACMTA staff will brief the City on the results of those studies when completed, and LACMTA will also continue to coordinate with SCRRA and the City to ensure the City is kept fully informed of future LACMTA and SCRRA projects within the railroad right-of-way.

The City states there is a long history of safety concerns and a high rate of pedestrian /vehicle versus train collisions at or near intersections in San Fernando along the existing railroad right-of-way (three pedestrian versus train collisions since 2018 and over past 10 years there are almost double the number of incidents, many of them resulting in loss of life). They also noted that San Fernando Middle School is located adjacent to the railroad right-of-way.

Response. To minimize the potential for pedestrian/vehicle conflicts with trains, at-grade crossings will feature traffic signal preemption, which are intended to clear influence zone

queues but will also provide the additional benefit of preventing movements toward the grade crossing when the gates are down. The traffic signals and crossing controls will be upgraded by modifying the traffic signals as needed to conform to the preemption needs per CPUC and other responsible agency requirements. To avoid bottlenecks downstream of crossings, the source of congestion can be reduced by creating lane drops upstream of the crossing and the rail crossing warning times will be set to handle the longest trucks. Automatic devices will control all pedestrian and vehicular movements and additional pedestrian gates, where feasible, will control the pedestrian route across the LRT and Metrolink tracks. Mitigation measures will also be implemented to ensure safe access to local schools, including San Fernando Middle School, during the construction period (see mitigation measures MM-SS-2, 3, 6, 8, and 10 in Section 4.14-Safety and Security section of the FEIS/FEIR).

The City states that the Grade Crossing Safety Study produced by LACMTA in 2018: appears to not include pedestrian counts at key walking intersections; there is no consideration of increased safety measures by the ESFVTC Project, such as a pedestrian bridge or grade separation; and does not take into account the significantly increased vehicle wait times at all affected intersections and how that will affect driver behavior over the long term, specifically drivers that try to "beat the gate." They also stated there is no analysis of the significant impact of four tracks on the San Fernando Police Department's ability to provide public safety to the residents living on the southwesterly portion of the tracks (approximately 7,000 residents, more than 25% of the City's population). The City believes there should be a higher-level safety study and additional mitigation measures, including grade separation, pedestrian bridges, and public safety overrides that exceed LACMTA's baseline safety measures should be implemented.

Response. LACMTA notes in response that at the time of the drafting of the Grade Crossing Safety Study, the Brighton to Roxford Project did not have a funding source and as such, there was some question as to whether the Project would be constructed. Therefore, the Grade Crossing Safety Study reviewed the effects of a three-track alignment. Currently, the Brighton to Roxford Project (segment 3) is funded only to a "shovel-ready" level. Construction funding has not yet been secured and a construction schedule remains to be determined. Due to SCRRA and City of San Fernando concerns expressed in their comment letters on the FEIS/FEIR, LACMTA will update the Grade Crossing Safety Study to consider the effects of four tracks at the study intersections in the FEIS/FEIR. LACMTA is also proposing to conduct supplemental design, traffic, and environmental analyses in response to the City's comments. Staff will coordinate with SCRRA and the City of San Fernando to determine the types of analyses that are best suited to forecast the effects and make design recommendations. Additionally, the analyses will be completed before proceeding with any construction activities on the railroad section of the alignment.

With regards to vehicular and traffic circulation analysis, the City maintains that there are significant flaws with the traffic study conducted as part of the EIS/EIR analysis. The City notes that the traffic counts in the EIS/EIR are from 2010, 2011, and 2012 and were measured in the midst of a deep economic recession. The City there has also been a significant amount of housing development along Foothill Boulevard in Sylmar and San Fernando Road in Sylmar, as well as a significant increase in the study population at Mission Community College, all of which have added additional traffic, especially along Hubbard Avenue. The City also questions why there was no study of other intersections that could

be affected by significant queuing, such as First Street and Maclay Avenue, First Street and Hubbard Avenue, and Second Street and Hubbard Avenue. The traffic study also did not consider the impact of the Brighton to Roxford Project, which will further exacerbate traffic impacts. According to the City, an updated Level of Service analysis should be conducted at these intersections and to reflect two new signalized intersections as well that also determine where vehicles queuing at affected intersections are originating and their ultimate destination.

> Response. As noted above in the response to the City's comment on the Grade Crossing Study, LACMTA has agreed to conduct additional analyses before proceeding with construction of the segment of the ESFVTC Project within the railroad right-of-way. Those analyses will include a supplemental traffic analysis, which will include additional intersections adjacent to the corridor that will be identified in consultation with the City of San Fernando. The additional analysis will address future (2040) cumulative project conditions due to operation of two at-grade LRT tracks and two Metrolink tracks. The LACMTA traffic model used to determine future traffic conditions uses Southern California Association of Governments (SCAG) socioeconomic data, which represents future growth in population and employment based on information provided by agencies across the SCAG region on their planned growth in these respective areas. Individual development projects, such as a housing project, are accounted for in the SCAG model growth forecasts. To ensure the evaluation of existing and future traffic conditions reflect "typical" conditions, most recent (pre-Covid-19) available traffic data available will be used to document existing conditions and it is assumed that transit ridership will return to more normal levels in future post-Covid-19 years. It is anticipated the analyses will begin in the summer of 2021 and will be completed before LACMTA proceeds with construction of the second phase of the ESFVTC Project.

The City also notes that past air quality studies conducted by local agencies have determined that the City experiences a heat island effect and their residents are disproportionately affected by childhood asthma. Therefore, an air quality study should be conducted to determine the impact of additional vehicle idling at affected intersections for longer periods of time.

> Response. LACMTA has agreed to conduct additional studies to address the City's concerns. However, with regards to air quality effects due to additional vehicle delay resulting from the cumulative effects of the ESFVTC Project and Metrolink project , it is important to note that air pollutant concentrations decrease as distance from the emissions source (i.e., idling vehicles) increase and vehicular idling emissions will diminish in future years because (1) new vehicles must meet more stringent emissions standards, and (2) older, more polluting vehicles gradually retire from the vehicle fleet. These two phenomena result in a cleaner emitting vehicle fleet over time. Additional state regulations, such as the recently adopted Advanced Clean Truck Rule, will also reduce idle emissions. The rule will start in 2024 with requirements for zero-emission trucks to make up 5 to 9 percent of sales, depending on truck size, and gradually increase through 2035, when 55 percent of sales of light trucks, 75 percent of medium- and heavy-duty trucks and 40 percent of tractor-trailers will have to be zero-emissions. For these reasons, the Project's direct and cumulative effects on vehicle idling emissions near at-grade railroad crossings at the Project opening year and in the year 2040 (the year analyzed in the FEIS/FEIR) will be less than significant and the Project's Air Quality Conformity finding will not change.

With regards to the effects on childhood asthma due to localized cumulative effects, researchers have long linked asthma— a serious and life threatening chronic respiratory disease that affects the quality of life of more than 23 million Americans— with exposure to air pollution. Air pollution can make asthma symptoms worse and trigger asthma attacks. The estimated six million children in the United States with asthma are especially vulnerable to air pollution. While the ESFVTC Project will have a beneficial effect on regional emissions, local emissions may marginally increase in some areas and additional vehicle idling due to the construction of a second Metrolink track could further increase localized emissions. However, as noted above, those emissions are expected to reduce over time due to more stringent vehicle emissions standards and conversion of vehicle fleets to zero-emission vehicles. Additionally, local effects related to mobile-source air toxics, carbon monoxide, and particulate matters were evaluated and disclosed in the ESFVTC DEIS/DEIR. That analysis demonstrated that localized effects on air quality due to the ESFVTC Project will be less than significant.

According to the USEPA, heat islands are urbanized areas that experience higher temperatures than outlying areas. Structures such as buildings, roads, and other infrastructure absorb and re-emit the sun's heat more than natural landscapes such as forests and water bodies. Urban areas, where these structures are highly concentrated and greenery is limited, become "islands" of higher temperatures relative to outlying areas. Daytime temperatures in urban areas are about 1–7°F higher than temperatures in outlying areas and nighttime temperatures are about 2-5°F higher. Under the ESFVTC Project, track installation will occur within existing railroad and public street rights-of-way. No natural landscapes will be displaced and any existing trees that are removed will replaced at a ratio consistent with local city ordinances. For these reasons, the Project would not individually or cumulatively result in a significant heat island effect.

The City states that the San Fernando City Council has been adamantly against private property acquisition along this critical commercial corridor. Although the City notes that most properties adjacent to the LACMTA right-of-way will be preserved, there are still multiple properties that will be affected. Additionally, the City states that they were open to LACMTA acquiring portions of the San Fernando Police Department property and public parking lot 6N provided that LACMTA replaces the parking and/or construct a parking structure adjacent to the Maclay station. Based on the FEIS/FEIR noting that not all parking will be replaced, the City no longer supports acquisition of a portion of the Police Department property and public parking lot 6N. However, the City states that they would be receptive to acquisition of a portion of the parking lot, if LACMTA replaces the parking and/or constructs a parking structure adjacent to the Maclay station. If parking is not constructed to support the Maclay station, the City is concerned that LACMTA patrons will park in the City's public lots (Lots 4, 5, and 6N) that are reserved for customers of the City's Downtown Business District, which will create a significant parking issue in the area.

Response. LACMTA will continue to consult and coordinate with the City to determine ways to minimize property acquisitions, including existing parking spaces, to the maximum extent plausible and develop replacement parking as needed.

Public Comments on the FEIS/FEIR Received after the Public Review Period

No additional substantive comments were received after the close of the public review period.