



THE CITY OF  
**SAN FERNANDO**

CITY COUNCIL

November 17, 2020

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Mr. Walter Davis, Project Manager  
East San Fernando Valley Transit Corridor  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza, MS 99-22-4  
Los Angeles, CA 90012-2952

**SUBJECT: Comments on Final Environmental Report/Statement (EIR/EIS) for the East San Fernando Valley Transit Corridor (ESFVTC) Project**

Dear Mr. Davis:

I would like to thank Metro staff for the presentation of the ESFVTC final EIR/EIS to the San Fernando City Council on October 19, 2020 and appreciate extending the review period through November 17, 2020. Upon review of the final EIR/EIS and the responses provided to the City's comments, the City continues to have concerns with the level of impact that was studied through the EIR/EIS process.

The corridor on the existing rail right-of-way through San Fernando has different challenges than the segment along Van Nuys Boulevard in the City of Los Angeles. Consequently, the City believes the level of analysis should be different for both segments, which leaves the current EIR/EIS analysis lacking in the following areas:

**Project Definition** – The EIR/EIS only studied the addition of two light rail tracks to the existing rail right of way. According to Metro staff, the Metrolink Brighton to Roxford Dual Track project was not included in the analysis because that project is not funded. However, the Metrolink Antelope Valley Line (AVL) Dual Track project is now funded and, through that project, Metrolink has a stated goal of 15-minute headways during peak hours. The construction of the AVL project will make the "Brighton to Roxford" segment a significant bottleneck and barrier to achieving Metrolink's 15-minute headway goal. Therefore, it is reasonable to assume that "Brighton to Roxford" is now a high priority to receive funding.

Based on this information, the "Project Definition" for the segment through San Fernando needs to be revised and the EIR/EIS needs to include an analysis of a second Metrolink track and 15-minute peak hour headways. All related environmental studies must be revised and the environmental impact must consider a total of four tracks with 15-minute peak hour headways for Metrolink and 6-minute peak hour headways for Metro. The City believes this will have a

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significant impact on the environmental conditions in San Fernando that are not contemplated in the current EIR/EIS.

**Safety Analysis** – Unlike the Van Nuys Blvd segment, there is a long history of safety concerns and a high rate of pedestrian/vehicle versus train collisions at or near the intersections in San Fernando along the existing rail right-of-way. Since 2018, there have been three pedestrian versus train collisions, the most recent occurring on October 20, 2020. Looking back ten years, there are almost double that number of incidents, many of them resulting in loss of life. Additionally, San Fernando Middle School (LAUSD) is located directly adjacent to the rail right-of-way and hundreds of students cross the tracks during school days, which creates a high-risk environment. This poor safety record is in the current condition, which is only one Metrolink track.

After reviewing the Grade Crossing Safety Study produced by Metro in 2018 to evaluate the safety of each grade crossing, it does not appear to include pedestrian counts at key walking intersections, such as Brand Boulevard, where the aforementioned San Fernando Middle School is located. Other than the standard pedestrian gates, there is no consideration of increased safety measures by the ESFVTC project, such as a pedestrian bridge or grade separation, which should be analyzed at a highly trafficked pedestrian crossing directly adjacent to a middle school. The Grade Crossing Study also does not seem to take into account the significantly increased vehicle wait times at all the impacted intersections and how that will impact driver behavior over the long term. Specifically, drivers that try to “beat the gate” because they know they will be stuck idling for a significant amount of time, causing them to be late to work or school.

Lastly, there is no analysis of the impact of the four tracks on **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) live on the other side of the railroad right of way from the Police Department building. The addition of three at-grade tracks will significantly impact SFPD’s response time and ability to service 25% of the City’s population as officers will be stuck behind safety gates as up to 28 trains per hour transverse the City.

Due to the long history of significant safety concerns along this corridor, the City feels there should be a higher level of safety study and additional mitigation measures, including grade separation, pedestrian bridges, and public safety overrides, that exceed the baseline safety measures that Metro typically constructs. Additional analysis of this corridor is particularly imperative as the

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built environment will be increasing from one heavy rail track to two heavy rail and two light rail tracks.

**Vehicular and Traffic Circulation Analysis** – The City has maintained the position that there are significant flaws with the Traffic study conducted as part of the EIR/EIS analysis. Particularly, the traffic counts utilized in the EIR/EIS Transportation Impact Report are from 2010, 2011, and 2012, which makes them 8-10 years old and measured in the midst of a deep economic recession with very high unemployment and high commercial vacancy rates.

Additionally, since 2012, there has been significant development of housing units along Foothill Boulevard in Sylmar and along San Fernando Road in Sylmar as well as a significant increase in the student population at Mission Community College in Sylmar. All of these have added vehicle traffic, especially along Hubbard Avenue, since the traffic counts were conducted in 2012. Therefore, the traffic counts are not reflective of current or future traffic levels.

The City also questions why there was no study of other intersections that could be impacted by significant queuing, such as at First Street and Maclay Avenue, First Street and Hubbard Avenue, and Second Street and Hubbard Avenue. Furthermore, two new signalized intersections are proposed as part of the project on First Street where it crosses at Brand Boulevard and at Jessie Street. These new signalized intersections are very close to the San Fernando Middle School and the intersection at Brand Boulevard is adjacent the SFPD station. An updated Level of Service traffic analysis should consider waiting periods at all of these intersections, as well as specific impacts to both the school and police station.

Additionally, as previously mentioned, the study did not include the impact of the Metrolink Brighton to Roxford project that will further exacerbate traffic impacts. More detail on the City's concerns are outlined in the letter to Metro dated October 25, 2017 and further expanded upon in the letters to Metro dated February 20, 2018 and March 30, 2020 (Attachments No. 1, 2 and 3).

To adequately address the traffic impacts of the Metro and Metrolink projects on the City of San Fernando, Metro should conduct a more comprehensive circulation study to determine where vehicles queuing at impacted intersections are originating and their ultimate destination. This will inform: a) whether the vehicles are going in the same direction as the proposed LRT, in which case the LRT can be considered a mitigation, and b) if the vehicles are NOT going in the same direction as the LRT, meaningful mitigation measures, such as signage, traffic

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signal synchronization, and improvements to local arterial streets to route traffic to the 5, 118 and 210 Freeways and avoid grade crossings in San Fernando.

**Air Quality Analysis** – Past studies conducted by other agencies, including South Coast Air Quality Management District and Los Angeles County Public Health, have determined that San Fernando experiences a heat island effect<sup>1</sup> and our residents are disproportionately impacted by childhood asthma.<sup>2</sup> For these reasons, the City received a grant, in partnership with Tree People, to plant more than 700 trees in San Fernando. As part of the traffic and circulation analysis, an air quality analysis should be conducted to study the impact of additional vehicles idling at impacted intersections for longer periods of time. It stands to reason that this additional idling time will further exacerbate the City’s existing heat island condition and incidents of childhood asthma.

**Acquisition of Public and Private Property** – The San Fernando City Council has been adamantly against private property acquisition along this critical commercial corridor since this issue first arose in late 2017. These concerns are outlined in the letters to Metro dated October 25, 2017, February 20, 2018, and March 30, 2020. Although most of the private properties located adjacent to the Metro right-of-way will be preserved, there are still multiple properties that will be impacted.

Additionally, the City was open to Metro acquiring portions of the San Fernando Police Department property and public parking lot 6N PROVIDED that Metro replace the parking and/or construct a parking structure adjacent to the proposed Maclay station. However, Metro’s response in the EIR/EIS is that the parking will not be replaced. Consequently, the City does not support acquisition of the Police Department and public parking lot 6N. If parking is not constructed to support the Maclay station, Metro 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 and the maintenance of those lots is paid for by a Business Improvement District. This will create a significant parking issue in the area.

**Conclusion** – All of the concerns included in this letter have been raised at various times throughout the Draft EIR/EIS process. However, the City feels that these concerns have not been adequately addressed in the final document and failing to consider the impact of the Metrolink “Brighton to Roxford” project represents a significant deficiency in the EIR/EIS.

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<sup>1</sup> <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf>

<sup>2</sup> [http://publichealth.lacounty.gov/docs/HealthNews/Child\\_Asthma\\_2014.pdf](http://publichealth.lacounty.gov/docs/HealthNews/Child_Asthma_2014.pdf)

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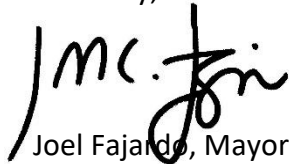
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Lastly, the City believes the two segments of the ESFVTC present very different environmental conditions with Segment One running parallel to a very busy major arterial (i.e. Van Nuys Boulevard) and Segment Two running along a busy railroad right of way with multiple future regional rail projects in the planning stages.

Therefore, the City of San Fernando requests the Metro Board consider conditional certification of EIR/EIS pending additional study of Segment Two as outlined in this letter. Additionally, the City requests a commitment from Metro that Segment Two will be constructed pending additional analysis and redesign.

Should you have any questions regarding our comments, please feel free to contact Mr. Nick Kimball, City Manager at (818) 898-1202, or via email at [Nkimball@sfcity.org](mailto:Nkimball@sfcity.org).

Sincerely,



Joel Fajardo, Mayor  
City of San Fernando

### Attachments:

1. Comment Letter to Metro, dated October 25, 2017
2. Comment Letter to Metro, dated February 20, 2018
3. Comment Letter to Metro, dated March 30, 2020

cc: Nick Kimball, City Manager, City of San Fernando  
Monica Born, Deputy Executive Officer, Program Management, Metro  
Karen Swift, Manager, Community Relations, Metro



**METROLINK**

SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY  
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[metrolinktrains.com](http://metrolinktrains.com)

November 16, 2020

Mr. Walt Davis  
Project Manager  
Los Angeles County Metropolitan Transportation Authority (Metro)  
One Gateway Plaza  
Los Angeles, CA 90012

**RE: Comments on East San Fernando Valley Transit Corridor Project –  
FINAL ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT  
REPORT (EIS/EIR)**

Dear Mr. Davis:

The Southern California Regional Rail Authority (SCRRA/Metrolink) has received and reviewed the East San Fernando Valley Transit Corridor (ESFVTC) Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR). We appreciate that Metro has addressed some of SCRRA's comments on the Draft EIS/EIR and in an accompanying study, East San Fernando Valley Transit Corridor Project – Metro Grade Crossing Safety Policy Analysis of the Proposed Metro Right-of-Way Crossings. However, additional work, refinement, and coordination is still required in order to develop a mutually acceptable project for the portions of the identified Locally Preferred Alternative (LPA) that overlap with Metro owned railroad right of way. The subject area is a 2.5-mile section of railroad right of way that currently services Metrolink's Valley Subdivision (also commonly referred to as the "Antelope Valley Line") and freight service operated by the Union Pacific Railroad (UPRR).

SCRRA notes that our comments on the Draft EIS/EIR and Metro's responses thereto were not published in Appendix A1 and A2 of the Final EIS/EIR. We have enclosed our letter, dated October 30, 2017, as **Attachment A**, to this letter for your reference. We appreciate Metro's correspondence outside the prior Draft EIS/EIR comment period on October 13, 2020 and subsequent to the October 2, 2020 opening of the comment period for the Final EIS/EIR. We have included Metro's response letter in **Attachment B**.

After reviewing the Final EIS/EIR, SCRRA understands that Metro's Board of Directors will consider splitting the LPA into two phases due, in part, to potential funding challenges. An Initial Operating Segment (IOS) will be considered by the Metro Board, with Phase 1 extending from the southern project terminus at the Van Nuys Metro Orange Line Station north to San Fernando Road. Under Phase 2, a shared corridor

with the proposed LRT, Metrolink, and UPRR service would operate between Van Nuys Boulevard and the Metrolink Sylmar/San Fernando Station.

In our review of the LPA, we did not see our previous comments and related concerns addressed. As a result, we request that Metro's LPA be refined to the funded Initial Operating Segment (Phase 1) of the ESFVTC Project and an interim operating condition for Phase 2 in recognition of the constrained right of way. This refinement to the LPA would provide SCRRA and Metro with sufficient time to address the project development and right-of-way issues that remain in a shared corridor scenario under Phase 2 and identifying feasible, cost-effective solutions in the corridor for an interim and ultimate operating condition.

This letter outlines SCRRA's comments on the Final EIS/EIR and suggested next steps in the two following sections –

- (1) Avoidance of the Metro-owned Metrolink Valley Subdivision (Antelope Valley Line) Right-of-Way
- (2) The funded IOS between the Metro Orange Line and the interim terminus at San Fernando Road and Van Nuys Boulevard

Please note that these comments on the Final EIS/EIR are initial general comments submitted to meet the CEQA and NEPA lead agency public comment periods. SCRRA may follow up with more specific comments, including technical comments for consideration, during the engineering and design of the project as it deems necessary. Comments are as follows:

## **1. Avoidance of the Metrolink ROW between Van Nuys Boulevard and Sylmar /San Fernando Station**

### **Comments**

#### **Cumulative Impacts with Metrolink "Brighton to Roxford" Double-Track Project**

Phase 2 of the LPA overlaps with a portion of Metro's and SCRRA's proposed "Brighton to Roxford" (B2R) project, which is undergoing final design, was environmentally cleared in June 2020, and is partially funded for construction. The B2R project would add a second track for conventional rail use across the entire length of the shared corridor, resulting in a combined total of four tracks in the corridor's ultimate configuration.

Double tracking associated with the B2R project was identified as a necessary project to support various scenarios in Metro's Antelope Valley Line Feasibility Study (October 2019). Furthermore, Metro's Board of Directors in Board Motion 5.1 (July 25, 2019) authorized the programming of \$6.6 million in unprogrammed FY18-22 Multi-year Subregional Programming (MSP) Transit Program funds and \$6.15 million in FY23 MSP Transit Program funds from the North County Subregion, in order to bring a portion of the B2R project and a set of other capital projects to "shovel ready" status (**Attachment**

C). Because of the priority the Metro Board has assigned to both the B2R Project and the ESFVTC Project, they should not be designed in isolation, but in coordination with one another to optimize the shared use of the corridor.

If Metro and FTA proceed with the LPA as defined in the Final EIS/EIR, SCRRA requests that the Metro design team analyze the ultimate condition for Phase 2, which would be characterized by two light rail tracks and two Metrolink tracks. At this time, SCRRA requires additional information to understand how a two-parallel track layout would operate and what additional right of way and if any new grade separations would be required. These concerns are elaborated further below. This coordination is important prior to certification of the Final EIR and issuance of the Record of Decision (ROD), because additional ROW needs may have the potential to result in new significant impacts not evaluated in the draft EIS/EIR.

#### Right-of-Way Acquisition

The Final EIS/EIR analysis appears to require additional consideration of the right-of-way needs for Phase 2 of the LPA. With the addition of two proposed light rail tracks to the corridor, the existing (approximately 100-foot-wide) rail corridor, which is narrower between N. Brand Blvd. and just west of N. Maclay Avenue, is expected to require additional right of way due to the placement of Metrolink's second track in the ultimate build-out condition. Based on our initial estimates, Metro will require no less than 120 feet in width to accommodate the following:

- Four railroad tracks (2 ESFVTC tracks and 2 Metrolink tracks);
- Proposed center platform LRT stations near Paxton Street and Maclay Avenue (*FEIS-FEIR, page ES-9*);
- Supporting signal infrastructure (signal houses and PTC towers);
- Reconstruction of intersections and grade crossings in their ultimate configuration;
- Required Metro and SCRRA access for maintenance of track and structures, including physical barriers, fencing, and gates;
- Utilities with access for maintenance; and
- Existing leases and licenses within the corridor.

#### Grade Crossing Configurations

There are five existing at-grade crossings within this 2.5-mile stretch that will be shared between Metrolink, freight and the proposed LRT. The ESFVTC team has studied the effect on grade crossing safety through these five crossings with the ESFV Transit Corridor Project, Metro Grade Crossing Safety Policy Analysis (Study) under the premise that the LRT system will be constructed first before the B2R project and, therefore, only considers a three-track at-grade crossing in their study. The Study concluded that the proposed improvements on the ESFVTC project would safely support a three-track at-grade crossing. SCRRA requests a more thorough analyses



that considers the full build-out condition as described above. Our initial comments for this Study are provided in **Attachment D**.

Particularly, according to the Policy, a complete Rail Operations Check that fully explores the need for Metrolink and UP trains to operate at full-speed through intersections is required. Furthermore, a Safety Operations check with the proposed mitigations also needs to be completed. These analyses need to be completed for both an interim three-track configuration (or interim condition) as well as a potential four-track configuration (or ultimate condition).

### **Required Next Steps – Metrolink ROW between Van Nuys Boulevard and Sylmar /San Fernando Station**

Based on our review, the Final EIS/EIR analysis only evaluates an initial operating condition for Phase 2 of the LPA. For this reason, SCRRA recommends additional coordination with the analysis the Metro Board directed (**Attachment C**) to better understand the ultimate condition and related LRT, commuter train, freight, pedestrian, and vehicular interactions along Metro's ROW between Van Nuys Boulevard and the Sylmar/San Fernando Station. With the issues highlighted above, we recommend the following:

- 1) Refine the LPA to include the IOS Phase 1 Project (along Van Nuys Boulevard) and an initial operating condition for Phase 2 that avoids impacts to Metrolink's AVL line and UPRR's existing freight service. The ultimate condition for Phase 2 (along the Metrolink Valley Subdivision [Antelope Valley Line] ROW between Van Nuys Boulevard and the Sylmar / San Fernando Station) should be deferred until additional analysis is completed to address a four-track configuration and related transportation impacts (traffic and rail operation), grade crossing and safety requirements, and right-of-way needs (*FEIS-FEIR, page ES-8*).
- 2) Perform a more thorough analysis of Connection Alternatives between the AVL and the ESFVTC project:
  - a. **Baseline:**  
Triple Track from Van Nuys to Sylmar/San Fernando [in right-of-way: ESFV (2 tracks) + AVL (1 track)]
  - b. **Full-Build:**  
Quadruple Track from Van Nuys to Sylmar/San Fernando [in right-of-way: ESFV (2 tracks) + AVL (2 tracks)]
  - c. **ESFV IOS With New Connection:**  
Build the IOS (Phase 1), create a new Transfer Connection station/hub at Van Nuys/San Fernando, and complete SCRRA double track between Van Nuys and Sylmar/San Fernando to support increased

frequencies on Metrolink in this segment to feed into the ESFV Metro Rail Line. The new transfer connection station/hub could possibly be a relocation of the Sun Valley station to Van Nuys Boulevard.  
[in right-of-way: AVL (2 tracks)]

d. **FRA-Compliant Light Rail:**

Build ESFVTC to FRA Tier-III Compliant standards for Light Rail, which at a minimum would make it easier and safer for ESFVTC to share the shared corridor, and could open the door to shared tracks solutions that benefit both the ESFVTC and AVL with more efficient, phased investment. Building the IOS to FRA Tier-III light rail standards leaves the door open to these solutions in the future, even if FRA interoperability is not pursued in the IOS.

*NOTE: this was not an option during the DEIS/DEIR in 2017, as FRA adopted Tier-III standards in late 2018 well after the Draft EIS/EIR comment period closed.*

[in right-of-way: TBD (3-4 total tracks)]

e. **Grade-Separated Metro Rail** Grade separate ESFVTC on the shared corridor (this connection may consider combination of the ESFVTC project with the Sepulveda Pass Transit Corridor Project as we suggested in our comments to the Draft EIS/EIR).

[in right-of-way: AVL (2 tracks); Over/under ROW: ESFV (2 tracks)]

All Connection Alternatives need to be brought to the same level of concept design and environmental analysis, including a comprehensive analysis of grade crossing requirements and consultation with CPUC, UP, City of San Fernando, City of Los Angeles, and SCRRA. In the absence of this information, it is not possible to determine the feasibility of a four-track interface, potential impacts of each of the Connection Alternatives, and the associated mitigation requirements when compared to the LPA.

- 3) Perform a thorough cost analysis of each Connection Alternative to fairly allocate the cost of the Cumulative Impacts and long-term requirements of each alternative in the corridor.

## **2. The Funded IOS between the Metro Orange Line and the Interim Terminus at San Fernando Road and Van Nuys Boulevard**

### **Comments**

#### **Station Connectivity between Metrolink and ESFVTC Station at the Van Nuys (Ventura County Line) Metrolink**

SCRRA supports the development of quality transit connections to its system, and encourages the ESFVTC project to design customer-friendly connections between the

project and the Metrolink's AVL. The connection at Van Nuys (Ventura County Line) Metrolink Station requires a winding roughly quarter-mile walk along poorly lit sidewalks between the two stations; if the ESFVTC station cannot be moved closer, then consideration should be given to linking the two stations with dynamic signage, lighting, and other pedestrian improvements such as a small paseo.

#### Parking

With no parking provided at the new ESFVTC stations (*Final EIS/EIR, page ES-10*), SCRRA requires that there be a plan for reserving parking for Metrolink riders at our stations during and after LRT construction. Furthermore, SCRRA requires a plan by Metro to ensure that the Metrolink parking spaces in Van Nuys Station (350 spaces / 14 ADA-accessible spaces) and Sylmar/San Fernando Station (375 spaces / 9 ADA-accessible spaces) will not be taken by the ESFVTC riders.

#### **Required Next Steps – for the IOS Section between the Metro Orange Line and the Interim Terminus at San Fernando Road and Van Nuys Boulevard**

SCRRA requests development of a Memorandum of Understanding (MOU) to indicate Metro's commitment to resolving the coordination issues noted above and a plan for resolving these issues associated with the interim and ultimate operating conditions for Phase 2 of the project. The MOU should be fully executed no later than 6 months after the certification of the Final EIR and issuance of the Record of Decision (ROD). Further, SCRRA requests that no construction activities related to phase 2 of this project would be advanced along the rail right of way until studies are completed and agreements are reached with SCRRA.

Thank you again for providing us with the opportunity to comment on the Final EIS/EIR. We look forward to our continued participation in this important transportation project that will provide many regional benefits. Should you have any questions, please feel free to contact me at (213) 452-0468 or via e-mail at [McIntyreT@scrra.net](mailto:McIntyreT@scrra.net) or Roderick Diaz at (213) 452-0455 or via e-mail at [DiazR@scrra.net](mailto:DiazR@scrra.net).

Sincerely,



Todd McIntyre  
Chief Strategy Officer