Los Angeles County Metropolitan Transportation Authority One Gateway Plaza 3rd Floor Board Room Los Angeles, CA



Board Report

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PLANNING AND PROGRAMMING COMMITTEE MAY 15, 2024

SUBJECT: EASTSIDE TRANSIT CORRIDOR PHASE 2 - PROJECT APPROVAL AND CERTIFICATION OF FINAL ENVIRONMENTAL IMPACT REPORT

ACTION: APPROVE RECOMMENDATIONS

RECOMMENDATION

CONSIDER:

- A. APPROVING the Board selected full nine-mile Eastside Transit Corridor Phase 2 with the Lambert Station in the City of Whittier as the terminus for the Project;
- B. APPROVING the refinement to the Board selected Locally Preferred Alternative (LPA), a 4.6mile extension of the existing Metro E-Line to Greenwood Station as the Initial Operating Segment; with design options for Atlantic/Pomona (open underground station) and Greenwood Station (at-grade) and a Maintenance and Storage Facility (including both at-grade and aerial yard lead design options) located in the City of Montebello;
- C. CERTIFYING, in accordance with the California Environmental Quality Act (CEQA), the Final Environmental Impact Report (EIR);
- D. ADOPTING, in accordance with CEQA, the:
 - 1. Findings of Fact and Statement of Overriding Considerations, and
 - 2. Mitigation Monitoring and Reporting Plan (MMRP); and
- E. AUTHORIZING the Chief Executive Officer to file a Notice of Determination with the Los Angeles County Clerk and the State of California Clearinghouse.

<u>ISSUE</u>

On April 26, 2024, the Final Environmental Impact Report (Final EIR) for the Eastside Transit Corridor Phase 2 (Project) was released for a 10-day public review period per CEQA guidelines. Metro is the CEQA Lead Agency and has completed the steps required for the Final EIR to be certified by the Board. The Executive Summary of the Final EIR is included in Attachment A. Certification of the Final EIR also includes approval of the Mitigation Monitoring and Reporting Plan (Attachment B) and the Findings of Fact and Statement of Overriding Conditions (Attachment C). The Project is a Measure R and Measure M project that is included in the 2020 Long Range Transportation Plan (LRTP) and the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The Board's approval of the Project's environmental document also provides for the inclusion of five park-and-ride facilities for the full 9-mile Project (which includes two park-and-ride facilities for the LPA to the Greenwood Station) and a Maintenance and Storage Facility (MSF) in the City of Montebello.

BACKGROUND

Eastside Transit Corridor Phase 2 is an approximately nine-mile light rail transit (LRT) extension from the existing Metro E (Gold) Line serving the cities and communities of Commerce, Montebello, Pico Rivera, Santa Fe Springs, Whittier, and unincorporated East Los Angeles and West Whittier-Los Nietos. At the December 2022 Board meeting, the Board approved the Locally Preferred Alternative (LPA), a 4.6-mile extension of the E-Line to Greenwood Station with design options for Atlantic/Pomona (open underground station) and Greenwood Station (at-grade) and a Maintenance and Storage Facility located in the City of Montebello. The Board authorized staff to include the full nine-mile Project alignment to Whittier in the Final EIR per the California Environmental Quality Act (CEQA). In addition, the Board directed staff to reinitiate the National Environmental Policy Act (NEPA) environmental clearance process for the LPA to pursue federal funding for this segment of the project.

The area surrounding the Project is home to approximately 722,000 residents and is a job center for approximately 274,000 employees. Recent growth projections show the residential population increasing by approximately 11% and jobs increasing by approximately 25% by 2042. The Project would traverse through densely populated, low-income, and heavily transit-dependent communities with major activity centers. About 119,759 people who live within ½ mile of the stations along the full alignment are identified as disadvantaged communities, low-income communities, and/or low-income households. Of this population, 49% identify as a Minority (or person of color) while 15% are transit-dependent and living below the federal poverty level, according to the American Community Survey.

Besides Metrolink and the Metro C-Line, there are currently no mass transit projects in the eastern/southeast region of Los Angeles County. The Eastside Phase 2 Project is anticipated to serve commuters in one of the most highly traveled corridors in the state of California.

The 4.6-mile Initial Operating Segment (IOS) of the Project is expected to serve over 11,000 average weekday boardings by the year 2042, and add 5,857 new daily transit riders. The LPA will ease traffic congestion by reducing 8,000 vehicle miles traveled (VMT) daily, and it will reduce greenhouse gas emissions on the order of 8,429 metric tons of carbon dioxide equivalent (MTCO2e) over the Project life.

Once fully built to the Lambert Station terminus, the Project is expected to serve over 15,000 average weekday boardings, an increase of 7,700 in daily transit ridership. The Project will reduce daily VMT by over 10,000 vehicle miles and reduce greenhouse gas emissions on the order of 9,664 MTCO2e over the Project life.

The Project will enable transit-oriented development and in-fill growth opportunities for underutilized

lands in eastern LA County to accommodate increased population and economic demands. The construction and operation of the full Project are projected to create approximately 1,493 to 1,606 jobs and generate approximately \$1 billion per year in economic activity for the region, based on preliminary economic analysis for the environmental analysis. Additional information on the Project is provided in the Executive Summary (Attachment A).

Metro has implemented a comprehensive outreach program for the Project, starting in 2007 with outreach meetings for the Alternatives Analysis (AA) and continuing through 2022 for the efforts related to the refinement of alternatives and the Recirculated Draft EIR. Metro has informed elected officials, agency staff (e.g., the Washington Coalition and other local, state, and federal partnering agencies), community stakeholders, and the general public of the status of the Project during each phase, including the progress of the environmental review process.

The following is a summary of the public meetings held that helped inform the Board's decision for the selection of the Project Definition and the LPA:

- June 2019 Six public Scoping meetings (total of 573 participants) following the release of a Notice of Preparation (NOP) on May 31, 2019, to inform the public of Metro's intent to prepare a Supplemental/Recirculated Draft EIS/EIR
- February 2020 Three post-Scoping community meetings (total 234 participants) in anticipation of recommending the withdrawal of the SR-60 Alternative and Combined Alternative from further evaluation to the February 2020 Metro Planning and Programming Committee and Metro Board meeting
- August-November 2021 Six outreach events with community members (total 440 engagements) along the corridor
- November 2021 Four community meetings for project updates (total 276 participants)
- January and March 2022 Two business meetings in East Los Angeles to notify business
 owners and tenants of Project updates including preliminary station design options, and
 discuss potential impacts to businesses and mitigation measures for the recirculated Draft EIR
- March 2022 Four community meetings (total 307 participants) to provide project status updates and information on the station design efforts
- July-August 2022 Four public hearings (total 164 attendees) following the June 30, 2022 release of the Recirculated EIR to receive public comments on the Recirculated Draft EIR
- November 9, 2022 Virtual Community Meeting (total 60 participants) to share information on the staff recommended LPA prior to the November 2022 Metro Board Planning and Programming Committee meeting
- November 16, 2022 Metro Planning and Programming Committee and the December 1, 2022 Metro Board meeting to receive public comment on staff recommendations for approving the full nine-mile project through CEQA and the LPA (IOS Greenwood) with design options.

Metro also coordinated with cities and stakeholders in the run-up to the release of the Final EIR to inform the public about the Project and the public review period. In addition, the Project team has utilized a variety of forums and platforms, languages, and access methods for engaging people of color, low-income, limited English proficiency populations, and persons with disabilities, as noted in the Discussion section in more detail.

DISCUSSION

California Environmental Quality Act (CEQA)

Metro, as the CEQA lead agency and proponent for the Project, has, in coordination with the cities of Commerce, Montebello, Pico Rivera, Santa Fe Springs and Whittier, and LA County (for the unincorporated communities of East Los Angeles and West Whittier-Los Nietos), completed an environmental impact report (EIR) for the proposed Project. If the Metro Board Certifies the EIR and approves the proposed Project, thereby completing the CEQA environmental clearance, the Project will be eligible to commence right-of-way acquisition, utility relocation, and other construction activities.

CEQA requires that Metro balance, as applicable, the economic, social, technological, and other benefits of the Project against its unavoidable impacts when considering project approval and certification. CEQA Guidelines Section 15091(a) states that no public agency shall approve or carry out a project which identifies one or more significant environmental effects unless the public agency makes written findings for each of the identified significant effects, accompanied by a brief explanation of the rationale for each finding.

Prior to approving the proposed Project, the Board must find that notwithstanding the disclosure of these significant and unavoidable impacts, there are specific overriding reasons for approving this Project and that these reasons serve to override and outweigh the Project's significant unavoidable effects. CEQA requires that support be provided in writing of the specific reasons for approving a project when significant impacts cannot be avoided or substantially lessened. These findings are included in the Project's Statement of Overriding Considerations (Attachment C).

Section 21081.6 (Assembly Bill 3180) of the California Public Resources Code requires the Lead Agency(for each project that is subject to CEQA) to monitor performance of the mitigation measures included in the environmental document to ensure that mitigation does, in fact, take place after a project is approved. Therefore, a Mitigation Monitoring and Reporting Program (MMRP) has been prepared to ensure compliance with the adopted mitigation measures. The purpose of the MMRP is to ensure that the mitigation measures identified in the Final EIR that mitigate the potentially significant environmental effects of the Project are properly carried out. Metro is responsible for assuring full compliance with the provisions of the MMRP (Attachment B).

Community Outreach

Prior to the Board's selection of the LPA, Metro released the Recirculated Draft EIR for a 60-day public review and comment period, which transpired between June 30 and August 29, 2022. Prior to releasing the Draft EIR, Metro conducted numerous outreach efforts to notify the public about the project, the public review period, and how to comment on the Project. Noticing of its release was done in accordance with CEQA regulations that also extended the notification process and included three coordinated rounds of notification that included information on the June 2022 meetings, details about the Public Hearings, the official release date of the Draft EIR, and comment methods of the Draft EIR.

Public notification for the Draft EIR incorporated a combination of 53,000 direct mail notices, 92,000 door-to-door drop-offs, required legal notices (English and Spanish) in local newspapers, social

media posts and ads, e-blasts, 676 SMS text messages, podcasts, press releases, notices on the project website, information booths at local events, pop-up events, and other methods. The notifications were distributed to residents and business owners near the project area, CBOs, agency stakeholders, elected officials, etc. Both English and Spanish-speaking staff members and Spanish translators were present at public hearings and outreach events to engage the public. In addition, the project team engaged a CBO roundtable with representatives from eight CBOs including Self Help Graphics & Art, Mundo Maya Foundation, Los Angeles County Bicycle Coalition, Strength Based Community Change, Public Matters, Women in Non-Traditional Employment Roles, Disability Rights California, and Alma Family Services. The project team also conducted door-to-door business outreach to at least 49 businesses in East Los Angeles and provided project information to students, parents, and staff in several school districts in East Los Angeles, Montebello, Commerce, and Whittier, and collaborated with the California Association for Bilingual Education (CABE) podcast in Whittier.

The Notice of Availability (NOA) for the Draft EIR was filed with the California State Clearinghouse and mailed to public and responsible agencies, organizations, elected officials, and other interested parties. The NOA was distributed to the public (e.g., agency and community stakeholders, property owners, Draft EIR commenters, and elected officials) at the start of the comment period to announce the availability of the Draft EIR and to promote the public hearings.

Over the 60-day public comment period, a total of 301 comment submissions were received, which encompassed approximately 900 comments. The Washington Coalition, comprised of the five incorporated cities along the corridor, collectively submitted a letter of support for the project. As part of the public participation process, a petition was submitted with approximately 1,600 (unverified) signatures endorsing the Transportation System Management Alternative (TSM). The TSM Alternative, which analyzes other transportation modes such as bus improvements and Intelligent Transportation Systems (ITS) solutions, was not studied in the Draft EIR for two reasons. First, the TSM alternative was analyzed in the initial environmental document released in 2014 and the analysis did not find sufficient transportation benefits to meet Project objectives. Second, a TSM analysis is not required by CEQA and the Federal Transit Administration (FTA). As such, the Draft EIR is compliant with CEQA Guidelines Section 15126.6(a), describing a range of reasonable alternatives to the project. Further, the No Project Alternative includes Next Gen bus improvements as the baseline evaluation.

Since the Board selected Lambert Station as the terminus of the full nine-mile Project and the IOS Greenwood Station as the LPA in December 2022, staff has been working with internal and external stakeholders, including various cities and agencies to resolve the Draft EIR comments. Metro staff has been engaging the elected officials, corridor cities and community members during the preparation of the Final EIR to provide project status updates and ongoing station design efforts and provide stakeholders the opportunity to ask questions.

Since December 2022, the Project team has held over 75 stakeholder meetings, including briefings with elected officials, corridor cities, Washington Coalition, Gateway Cities Council of Government, and local, state, and federal partnering agencies (such as FTA, Caltrans, CPUC), key third-party utility owners, a project community-based organization (CBO) roundtable, and key community stakeholders. The project team attended 6 local community events to provide information. In addition, in partnership with subcontracted CBOs, the project team conducted 7 First/Last Mile (FLM) technical

walk audits, 4 rail tours, 7 pop-up events, 8 FLM community walk/wheel audits, and an online FLM community survey. Project development has been directly influenced by this engagement.

Comments received - both during the formal commenting period, as well as afterward - cover a wide range of topics, including concerns for construction impacts and property acquisition, additional traffic and grade crossing analysis and mitigation, parking capacity, station design and access, project alignment vertical profile, and other issues. Staff completed various technical studies to respond and incorporate comments and reflect design refinements including, but not limited to:

- A grade separation study for an aerial yard lead track option for the Maintenance and Storage Facility located in the city of Montebello
- Additional interlockings for the Atlantic/Whittier Station, Greenwood Station, and Lambert Station, with a design option for relocating an existing crossover from the existing Atlantic Station to be between Maravilla Station and East LA Civic Center Station for meeting the Metro Rail Design Criteria (MRDC) for revenue services and safety standards for rail operations and maintenance.

Responses to all comments received during the Project's Draft EIR 60-day Public Review and Comment period were drafted and are included in Appendix B of the Final EIR. A confirmed final project definition/design for the Final EIR and 15% Advanced Conceptual Engineering (ACE) Plans were completed in early April 2024.

The Notice of Availability (NOA) for the Final EIR was filed with the California State Clearinghouse and mailed to public and responsible agencies, organizations, elected officials, and other interested parties. The NOA was distributed at the start of the comment period to announce the availability of the Final EIR and to promote the public hearings. For consistency with earlier environmental documents, the Final EIR can be accessed via the Metro project website (<u>metro.net/eastsidephase2</u>>). The Final EIR will also be published on the State Clearinghouse (<<u>https://ceqanet.opr.ca.gov/></u>).

A digital copy of the Final EIR will be mailed to agencies, impacted parcel owners, and Draft EIR commenters. The printed copies of the Final EIR will be made available at the following library locations along the project corridor:

- 1. Metro Headquarters, Dorothy Peyton Gray Transportation Library, One Gateway Plaza, Los Angeles, CA 90012
- 2. East Los Angeles Library, 4837 E 3rd Street, East Los Angeles, CA 90022
- 3. Rosewood Neighborhood Library, 5655 Jillson Street, Commerce, CA 90040
- 4. Chet Holifield County Library, 1060 S Greenwood Avenue, Montebello, CA 90640
- 5. Pico Rivera County Library, 9001 Mines Avenue, Pico Rivera, CA 90660
- 6. Los Nietos County Library, 8511 Duchess Drive, Whittier, CA 90606
- 7. Whittier Central Library, 7344 Washington Avenue, Whittier, CA 90602
- 8. Sorensen County Library, 6934 Broadway Avenue, Whittier, CA 90606

For the Final EIR, Metro also issued social media announcements, English and Spanish notices on the project website, newspaper ads, shared bilingual project e-blasts to over 2,400 email database contacts and MMS (texts) to 130 cell phones as well as distributed 45,000 printed notices through door-or-door notifications along the corridor, a mailed notice to over 31,000 stakeholders, and over

5,000 fliers at seven information booths at local events, seven pop-up events, and drop offs at public counters. These notifications were distributed to Draft EIR commenters, residents, business owners, CBOs, agency stakeholders, elected officials, etc.

Project Cost

As presented in December 2022 when the LPA was approved by the Board, the project team worked closely with Program Control's Cost Estimating staff in November 2022 and completed an Independent Cost Estimate update. With consideration of appropriate contingencies and escalation, the forecasted cost estimates are \$10.169B for the full nine-mile Project and \$7.902B for the LPA (IOS Greenwood) based on the advanced conceptual engineering design plan (15% design).

Funding Plan

The Measure M Ordinance identifies \$3 billion (2015\$) in Measure M and other local, state, and federal funding for the Project. Because the Measure M Ordinance funding is less than the current cost estimates, the full project approved under CEQA will be developed in segments. The funding plan for the LPA (IOS Greenwood) was presented to the Board in December 2022 and is comprised of committed Measure R, Measure M, and other local sources, and state and federal grant funding that is yet-to-be secured.

Uses	IOS Greenwood
Total, Uses	\$7.9
Sources - Secured	
Local (Sales Tax, 3% Contribution)	\$3.4
Sources - Yet-To-Be-Secured	
Local (Sales Tax, 3% Contribution)	0.4
State (Cap/Trade, SB-1 Surplus)	1.8
Federal (IIJA/BIL)	2.4
Total, Sources	\$7.9

Costs in year of expenditure dollars, in billions

Metro will seek funding from existing state grant programs for a significant portion of the funding need, which may include the Transit and Intercity Rail Capacity Program (TIRCP), Regional Improvement Program (RIP), and the Solutions for Congested Corridors Program and Local Partnership Program created by the Senate Bill 1 (SB-1). Metro will also seek existing and new federal funding related to the Infrastructure Investment and Jobs Act to fund the LPA, which may include Capital Investment Grants, Congestion Mitigation & Air Quality Program (CMAQ), National Infrastructure Project Assistance Program (MEGA), and Local and Regional Project Assistance (RAISE). The transfer of existing local sales tax funds may also be required, given the risk that the amount of funding needed cannot be met with federal and state grants. Local tradeoffs (i.e., transfer of funds) from other projects and programs may also be considered.

The funding plan for the remaining project to Whittier includes additional yet-to-be-secured federal, state, and local funding. The plan to Whittier assumes the existing federal Capital Investment Grants and state SB-1 grant programs will be functioning and potential funding sources for the completion of the project when additional funding is available from these programs over time after funding the LPA. Metro will continue seeking funding opportunities for the Whittier segment while completing the LPA. The exact timing will depend on the success in getting needed local, state, and federal funding. The local funding requires prioritizing this segment of the Project. Metro's success in obtaining state and federal funding will depend on the availability of these funds and the relative competitiveness of the project.

Staff will continue the development of a funding strategy for the LPA and the full Project to address the funding gap. As the project progresses to key milestones, staff will continue coordinating with the Early Intervention Team (EIT) to identify project risks and mitigation opportunities to control the project costs, including assessment of project delivery method options for future project phases, value engineering, working with local stakeholders to refine right-of-way acquisition assumptions, exercise cooperative agreements, streamline the permitting process with cities, etc.

National Environmental Protection Act (NEPA)

Metro will seek financial assistance from the Federal Transit Administration (FTA) to carry out the engineering and construction for the Project, starting with the LPA. Staff is working in coordination with FTA to initiate Categorical Exclusion for future geotechnical borings along the LPA and to determine appropriate NEPA document (e.g., Environmental Assessment and Findings of No Significant Impact (FONSI) and timing to reinitiate NEPA clearance and enter Project Development if and when appropriate. The NEPA clearance is necessary to ensure the environmental document is inclusive of all information required to meet federal environmental guidelines and to allow the Project to be eligible for federal funding. The FTA supports projects with known timelines and with local funding commitments. Staff will work with the FTA to complete the NEPA document and the Project should be positioned to compete for Federal funding opportunities that become available.

DETERMINATION OF SAFETY IMPACT

Recommended actions will not affect the safety of Metro customers and/or employees because this Project is in the planning phase and no construction or operational safety impacts result from this Board Action.

FINANCIAL IMPACT

Following the Board's approval of the Project and certification of the Final EIR, Metro will file a Notice of Determination (NOD) with the State Clearinghouse and the CEQA process is anticipated to be complete in Spring 2024.

The Board's certification of the full Project alignment to Whittier with a terminus at Lambert Station would represent Metro's commitment to the eventual buildout of this Project. While the Project will be built in phases pending funding availability, the Board's certification would allow staff to continue

advancing the design, start the right-of-way acquisition and relocation process, and advance utility relocation work starting with the LPA to the Greenwood Station. Metro staff will continue to inform communities as a part of the completion of the Final EIR process in Spring 2024 and will continue to engage the communities and key stakeholders and coordinate with FTA to reinitiate the NEPA clearance process and continue project design development in Summer/Fall 2024.

Impact to Budget

Funding for this action comes from Measure R, 35% Transit Capital, Measure M funds, as well as state grant funds that have been awarded to the Project. The FY 2023-24 budget contains approximately \$13M in Cost Center 4310 (Mobility Corridors), Project 460232 for professional services. Since this Project is a multi-year environmental planning process, the Cost Center Manager and Chief Planning Officer will be responsible for budgeting in future years. These funds are not eligible for bus or rail operating expenses.

EQUITY PLATFORM

Board certification of the Project is consistent with the goals and objectives outlined in the Metro Equity Platform Framework that identified that the Project traverses through Equity Focus Communities (EFCs) along the eastern portion of Los Angeles County. The full project alignment traverses six (6) Equity-Focused Communities (EFC), and there are 2,281 transit-dependent households along the project alignment and 1,828 transit-dependent households along the LPA. This Project will benefit these EFCs and other communities along the eastern portion of Los Angeles County by providing access to a reliable light rail system and filling a gap in high-quality transit services that currently exists. When the eventual build-out of the project occurs, communities along the corridor will have access to the Metro regional network and to activity centers and job opportunities along the corridor that include, but are not limited to, Whittier College, East Los Angeles College, Citadel Outlets, Historic Whittier Boulevard retail, and Presbyterian Intercommunity Hospital.

Since the selection of the LPA, Metro has been in collaboration with corridor cities and community stakeholders along the corridor through various outreach methods during the preparation of the Final EIR. The Final EIR project refinements have been directly influenced by this engagement. Metro has also initiated several planning activities, including First/Last Mile (FLM) planning and Transit Oriented Communities (TOC) Implementation Plans for all 7 stations along the full alignment. The project team has and will continue to engage CBOs for FLM and TOC planning, walk audits, outreach, and other activities.

Several cities along the corridor are updating their long-range plans, general plans, and/or corridor plans which may affect land uses around the proposed Metro stations for this Project. Metro's TOC grant writing and technical assistance funding programs make planning and capital dollars available to corridor cities. The assistance helps these cities be more competitive in applying for funding for projects that further affordable housing community stabilization, and other TOC activities. Metro's Countywide TOC Corridor Baseline Assessment process is being refined. Once completed, Metro will support corridor communities by providing program resources around affordable housing production and community stabilization. The project team will continue collaborating with the corridor cities, community stakeholders, and the CBO Roundtable to discuss project milestones and enhance

outreach methods.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The Project supports the following strategic plan goals identified in Vision 2028:

- Goal 1: Provide high-quality mobility options that enable people to spend less time traveling.
- Goal 3: Enhance communities and lives through mobility and access to opportunity and.
- Goal 5: Provide responsive, accountable, and trustworthy governance within the Metro organization.

ALTERNATIVES CONSIDERED

The Board could defer or not approve the Project, not certify the Final EIR, and/or not adopt the Findings and Statement of Overriding Considerations or the MMRP. However, this action is not recommended as it would jeopardize the Project schedule and delay progress toward revenue operations by Year 2035-2037 per Measure M. Delaying the Project would delay these efforts and add cost.

NEXT STEPS

Upon Board approval, Project staff will file the Notice of Determination (NOD) for the Project with the Los Angeles County Clerk and State of California Clearinghouse.

Staff will continue to engage the communities and key stakeholders as the Project develops. This includes coordination with FTA in submitting a request to reinitiate the NEPA clearance process by this summer and continue project design development in Summer/Fall 2024.

To be consistent with other projects' successful progress and delivery, Project staff will also coordinate with Los Angeles County, corridor cities including the Cities of Commerce, Montebello, Pico Rivera, Santa Fe Springs, and Whittier, and the Gateway Cities Council of Government (GCCOG) for the formation of a corridor city manager technical advisory committee and with necessary technical liaison support by Summer/Fall 2024.

ATTACHMENTS

Attachment A - Executive Summary

- Attachment B Mitigation Monitoring and Reporting Program
- Attachment C Findings of Fact and Statement of Overriding Considerations
- Attachment D Outreach Summary for CEQA Efforts

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