



CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

Public Resource Code Section 21081, CEQA Guidelines Section 15091 and Section 15093 for the Simi Valley Double Track Project (SCH No. 2020110122)

1 Introduction

The Southern California Regional Rail Authority (SCRRA) has made the following Findings of Fact for the Environmental Impact Report (EIR), State Clearinghouse (SCH) Number 2020110122, prepared for the proposed Simi Valley Double Track Project (Project). The EIR analyzes the significant and potentially significant environmental impacts, which may occur as a result of the Project. The Draft EIR was published on March 18, 2021 and circulated for a 45-day public review that ended on May 3, 2021. In compliance with the California Environmental Quality Act (CEQA), a Notice of Completion and the Draft EIR were filed with the State Clearinghouse at the time of publishing and are posted on the California Governor's Office of Planning and Research's CEQAnet Web Portal (SCH Project Number: 2020110122).

SCRRA, as the CEQA Lead Agency, published the Final EIR for the Project on June 28, 2021. The Final EIR includes comments received on the Draft EIR, responses to issues raised in the comments, and revisions to the text of the Draft EIR. Unless expressly called out independently, the Final EIR and the Draft EIR together constitute the "EIR" referenced throughout this document.

Section 9 describes the Findings Regarding Feasible Alternatives and describes why SCRRA has made the determination to select and implement Alternative 1 over the proposed Project.

Section 10 identifies the economic, social, and technical benefits of the Project and SCRRA's other overriding considerations in its' decision to approve the Project notwithstanding the significant and unavoidable environmental impacts that would result from the Project.

1.1 Purpose of CEQA Findings of Fact and Terminology

The CEQA Findings of Fact play an important role in the consideration of projects for which an EIR is prepared. Under Public Resources Code (PRC) Section 21081 and CEQA Guidelines Section 15091, when a Final EIR identifies one or more significant environmental effects, a project may not be approved until the public agency—in this instance SCRRA as the CEQA lead agency—makes written findings supported by substantial evidence in the administrative record regarding each of the significant effects (Findings of Fact). The three possible findings specified in CEQA Guidelines Section 15091(a) are:

1. Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

CEQA Guidelines Section 15092(b) provides that no public agency shall approve a project for which an EIR was prepared unless either:

1. The project approved will not have a significant effect on the environment, or
2. The public agency has:
 - a. Eliminated or substantially lessened all significant effects where feasible as shown in the findings under Section 15091, and
 - b. Determined that any remaining significant effects on the environment found to be unavoidable under Section 15091 are acceptable due to overriding concerns as described in Section 15093.

For those significant impacts that cannot be mitigated to a less than significant level, the public agency is required to find that specific overriding economic, legal, social, technological, or other benefits of the proposed project outweigh the significant effects on the environment (CEQA Section 21081(b) and Guidelines Section 15093). If such findings can be made, the Guidelines state in Section 15093 that “the adverse environmental effects may be considered acceptable.” CEQA also requires that findings made pursuant to Section 15091 be supported by substantial evidence in the record (CEQA Guidelines, Section 15091(b)). Under CEQA, substantial evidence means enough relevant information has been provided (reasonable inferences from this information may be made) to support a conclusion, even though other conclusions might also be reached. Substantial evidence includes facts, reasonable assumptions predicated on facts, and expert opinion supported by facts (CEQA Guidelines, Section 15384).

2 Project Description

The Project would include construction of a new side platform (south of the existing platform) and pedestrian underpass at the existing Simi Valley Station, the construction of a second main track along a 2.20-mile stretch of Metrolink’s existing Ventura Subdivision from Mile Post (MP) 436.20 to MP 438.40, and the implementation of two new control points (CP) at MP 436.30 (CP Sequoia) and MP 438.40 (CP Arroyo). New intermediate signals would be installed at MP 433.96, MP 435.13, and MP 437.30. Additionally, Project improvements would include supplemental safety measures at the existing at-grade crossings at Sequoia Avenue, Tapo Canyon Street, Tapo Street, East Los Angeles Avenue, and Hidden Ranch Drive, which would support future applications by the City of Simi Valley to the Federal Railroad Administration (FRA) for quiet zone status along the alignment.¹ Existing wet and dry utilities (above and below grade) within the Project study area would also be protected in place or relocated pending final engineering design and final placement of the proposed infrastructure.

As described more in Section 9 of these Findings of Fact, SCRRA has elected to implement Alternative 1, Reduced Main Track 2 Platform and Construction Staging, as described in Section 5.3, Alternatives, of the Draft EIR. Notwithstanding the relocated construction staging area and narrower platform width described for Alternative 1, all other aspects of Alternative 1 would be the same as the Project.

¹ Upon completion of the Project, the City of Simi Valley would be required to complete the Quiet Zone Creation Process in accordance with the regulations, policies, and procedures established by the Federal Railroad Administration (FRA) in its Train Horn Final Rule, as amended on August 17, 2006 (49 Code of Federal Regulations [CFR] Part 222).

2.1 Project Objectives

The Project includes the following objectives:

- Objective 1: Improve safety and reliability of the existing rail system
- Objective 2: Increase operational capacity of the existing Ventura County Line passenger rail system and increase passenger capacity at the Simi Valley Station
- Objective 3: Implement infrastructural improvements that will support the city's future applications to FRA for quiet zone status along the alignment

2.2 Discretionary Actions/Approvals by Other Agencies

The CEQA Guidelines require that an EIR identify the regulatory approvals anticipated for a project. This includes a list of responsible agencies other than the lead agency, which have discretionary approval authority over the Project. The following agencies, at minimum, are expected to use the Final EIR for Project-related discretionary actions and permitting processes:

- SCRRA
- FRA
- Federal Communications Commission
- California Public Utilities Commission (CPUC)
- Regional Water Quality Control Board
- City of Simi Valley
- Ventura County

3 Project Location

For the purposes of the EIR, SCRRA defined a Project study area, which comprises the Project's physical footprint along the approximately 2.20-mile segment of SCRRA's Ventura Subdivision (between MP 436.20 and MP 438.40) with a 500-foot buffer. The Project study area begins at its western terminus at Sequoia Avenue and ends east of Hidden Ranch Drive, just west of the Arroyo Simi Railroad Bridge, within the City of Simi Valley, California. The Project study area is part of the Simi Land Grant on the United States Geological Survey *Simi Valley East, California* 7.5-minute series topographical quadrangle.

4 Mitigation Monitoring and Reporting Program

Pursuant to PRC Section 21081.6, SCRRA has prepared and adopted a detailed mitigation monitoring and reporting program (MMRP) for the Project. The MMRP is designed to ensure that all mitigation measures required to reduce potentially significant Project impacts are applied on a timely basis during Project implementation.

The mitigation measures presented in the MMRP are referenced in the Findings of Fact and Statement of Overriding Considerations herein, as presented in Section 0.3, Errata to the Draft EIR, of the Final EIR.

5 Record of Proceedings

For purposes of CEQA compliance, including these Findings of Fact, the record of proceedings for SCRRA's decision on the Project consists of: (a) matters of common knowledge to SCRRA, including, but not limited to, federal, state, and local laws and regulations; and (b) the following documents which are in the custody of SCRRA, located at 900 Wilshire Boulevard, Suite 1500, Los Angeles, California 90017:

- Notice of Preparation and other public notices issued by SCRRA in conjunction with the Project
- The Draft EIR dated March 2021, including all associated technical appendices and documents that were incorporated by reference
- Testimony, documentary evidence, and all correspondence submitted in response to the Project during the scoping meeting or by agencies or members of the public during the public comment period of the Draft EIR; and responses to those comments (Section 0.2, Response to Comments, of the Final EIR)
- The Final EIR dated June 28 2021, including all associated technical appendices and documents that were incorporated by reference
- The adopted MMRP (Section 0.4, MMRP, of the Final EIR)
- Findings of Fact and resolutions adopted by SCRRA in connection with the Project; and all documents cited or referenced therein
- Final Project technical reports, studies, maps, correspondence, and all planning documents prepared by SCRRA or the consultants
- Documents submitted to SCRRA by agencies or members of the public in connection with development of the Project
- Actions of SCRRA with respect to the Project
- Other materials required by PRC Section 21167.6(e) to be in the record of proceedings.

6 Findings of Significant Impacts, Required Mitigation Measures and Supporting Facts

SCRRA, having reviewed and considered the information contained in the EIR and the entire administrative record, including but not limited to the expert opinions of SCRRA's professional planning and engineering staff and independent consultants familiar with the environmental conditions of the Project area and the facts and circumstances of the Project who prepared the EIR, finds pursuant to PRC Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1) that changes or alterations have been required in, or incorporated into, the Project which would mitigate, avoid, or substantially lessen to below a level of significance the potential significant environmental effects identified in the EIR.

Additionally, even though Alternative 1 would be required to implement the same mitigation measures as the proposed Project, Alternative 1 would be capable of reducing land use, visual, drainage, and floodplain encroachment impacts when compared to the proposed Project. As such, Alternative 1 is the environmentally superior alternative. Given that Alternative 1 would both a) meet the basic objectives of the Project and b) reduce potentially significant impacts when compared to the proposed Project, SCRRA has made the determination to pursue Alternative 1 as the selected project.

The Findings of Fact summarized below in Sections 6.1 through 6.12 incorporate the facts and discussions from the Draft EIR for Alternative 1 as the selected project. For each of the significant impacts associated with Alternative 1, the following sections are provided:

- *Potential Impact:* A specific description of the environmental impact identified in the EIR.
- *Finding:* One or more of the three specific findings set forth in CEQA Guidelines Section 15091.
- *Facts in Support of Finding:* A summary of the reasons for the finding(s).
- *Mitigation Measure(s):* Identified feasible mitigation measures or actions that are required as part of the Project and, if mitigation is infeasible, the reasons supporting the finding that the rejected mitigation is infeasible.

6.1 Aesthetics

6.1.1 Degradation of Visual Character or Quality

- A. **Potential Impact.** Increased activity and the presence of construction equipment may result in short-term visual impacts within the Project study area.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which would avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.1 of the Draft EIR, the Project's potentially significant short-term visual impacts would be mitigated to a level less than significant with implementation of Mitigation Measure AES-1.
- D. **Mitigation Measure(s)**

Mitigation Measure AES-1 Temporary Screening

6.1.2 Nighttime Light and Glare

- A. **Potential Impact.** Residential areas would be exposed to elevated levels of temporary nighttime lighting throughout Project construction. During operation, sensitive viewers may be subject to a significant increase in localized sources of light and glare.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.1 of the Draft EIR, the Project's potential nighttime light and glare impacts would be mitigated to a level less than significant with implementation of Mitigation Measure AES- 2 and AES-3.
- D. **Mitigation Measure(s)**

Mitigation Measure AES-2 Minimize Nighttime Work and Screen Direct Lighting

Mitigation Measure AES-3 Screen Direct Lighting and Glare

6.2 Air Quality

6.2.1 Air Quality Emissions

- A. **Potential Impact.** Project construction would result in emissions that exceed Ventura County Air Pollution Control District's regional significance thresholds for nitrogen oxides during the 2023 construction year. The majority of nitrogen oxide emissions are due to off-road construction equipment activity, with rubber-tired dozers being the largest single source.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.2 of the Draft EIR, the Project's potentially significant construction-related criteria pollutant emissions impacts would be mitigated to a level less than significant with implementation of Mitigation Measure AQ-1.
- D. **Mitigation Measure(s)**

Mitigation Measure AQ-1 Use of Tier 4 Construction Equipment

6.3 Biological Resources

6.3.1 Special Status Plant and Wildlife Species

- A. **Potential Impact.** have the potential to occur within the Project area. Indirect impacts on federally and/or state-listed, or special status plant and wildlife species could occur if they happen to be present in areas adjacent to construction activities. Indirect impacts may include decreased water quality, damage to potential foraging habitat resulting from fugitive dust associated with construction, or disruption of foraging, breeding, or communication resulting from additional noise or lighting associated with Project construction.

- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.3 of the Draft EIR, the Project's potentially significant direct and indirect impacts on special status plant and wildlife species would be mitigated to a level less than significant with implementation of Mitigation Measures BIO-1, BIO-2 and AQ-1.
- D. **Mitigation Measure(s)**

Mitigation Measure BIO-1 Implement Biological Resource Protection Measures During Construction

Mitigation Measure BIO-2 Avoid Impacts on Migratory and Nesting Birds

Mitigation Measure AQ-1 Use of Tier 4 Construction Equipment

6.3.2 Biological Resources - Trees

- A. **Potential Impact.** Construction could result in impacts to trees protected under the City of Simi Valley's Preservation ordinance, Municipal Code Chapter 9-38.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.3 of the Draft EIR, the Project's potentially significant impact to protected trees would be mitigated to a level less than significant with implementation of Mitigation Measure BIO-3.
- D. **Mitigation Measure(s)**

Mitigation Measure BIO-3 Protected Trees

6.4 Cultural Resources

6.4.1 Previously Unidentified Archaeological Resources

- A. **Potential Impact.** Previously unrecorded, buried remnants or archaeological deposits associated with the original location of Resource P-56-15320 may be disturbed during Project construction ground-disturbing activities. As such, the project has the potential to damage cultural resources that could qualify as unique archaeological resources pursuant to CEQA.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.4 of the Draft EIR, the Project's potentially significant previously undocumented cultural resources impacts would be mitigated to below a level of significance with implementation of Mitigation Measures CUL-1 and CUL-2.

D. **Mitigation Measure(s)**

Mitigation Measure CUL-1 Cultural Monitoring

Mitigation Measure CUL-2 Unanticipated Discoveries

6.4.2 Human Remains

- A. **Potential Impact.** Although the potential for encountering subsurface human remains within the Project site is low, there remains a possibility that human remains are present beneath the ground surface, and that such remains could be exposed during Project construction.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.4 of the Draft EIR, the Project's potentially significant impact to human remains would be mitigated to a level less than significant with implementation of Mitigation Measure CUL-3.
- D. **Mitigation Measure(s)**

Mitigation Measure CUL-3 Human Remains and Associated or Unassociated Funerary Objects

6.5 Geology, Soils and Seismicity

6.5.1 Ground Shaking, Liquefaction and Soil Erosion

- A. **Potential Impact.** The Project study area is located within Southern California, a seismically active region that is known for its many active faults and historic seismicity. The Project study area is subject to seismic ground shaking and potential liquefaction.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.6 of the Draft EIR, the Project's potentially significant seismic ground shaking and liquefaction impacts would be mitigated to a level less than significant with implementation of Mitigation Measure GEO-1.
- D. **Mitigation Measure(s)**

Mitigation Measure GEO-1 Final Geotechnical Report

6.5.2 Paleontology

- A. **Potential Impact.** Excavations within the Project study area that impact middle Eocene-age Lajas Formation at the surface (between Simi Valley Station and Tapo Canyon Road at-grade crossing), or excavations that impact, Pleistocene-age older sedimentary deposits, middle Eocene-age Lajas Formation, or Paleocene-age Santa Susana Formation at depth could encounter scientifically important paleontological resources.

- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.6 of the Draft EIR, the Project's potentially significant paleontology impacts would be mitigated to a level less than significant with implementation of Mitigation Measures PAL-1 through PAL-4.
- D. **Mitigation Measure(s)**

Mitigation Measure PAL-1 Paleontological Monitoring

Mitigation Measure PAL-2 Paleontological Spot Checks

Mitigation Measure PAL-3 Unanticipated Discovery of Paleontological Resources

Mitigation Measure PAL-4 Paleontological Reporting

6.6 Hazards and Hazardous Materials

6.6.1 Routine Transport, Use or Disposal of Hazardous Materials and Accidental Release

- A. **Potential Impact.** The routine handling, use, transportation, and disposal of hazardous substances would occur and may pose a significant hazard to the public or the environment if not properly managed. Hazardous materials used during construction would include commercially available hazardous materials such as lubricants (grease and oils), petroleum fuels, cleaning solvents, and paints—all of which are commonly used in urban construction projects. There is a potential for construction to also encounter subsurface contaminants and, although unlikely, result in the release of hazardous materials into the Project study area.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.8 of the Draft EIR, the Project's potentially significant impacts related to hazards and hazardous materials would be mitigated to a level less than significant with implementation of Mitigation Measures HAZ-1 through HAZ-3.
- D. **Mitigation Measure(s)**

Mitigation Measure HAZ-1 HMMP

Mitigation Measure HAZ-2 Unanticipated Encounters with Contaminated Soils

Mitigation Measure HAZ-3 Soil Management Plan

6.6.2 Emergency Response Plan

- A. **Potential Impact.** The increased movement of construction vehicles and equipment through the area may result in temporary impacts on surrounding roadways and associated delays in emergency service providers' response times.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.8 of the Draft EIR, the Project's potentially significant impact on emergency service providers would be mitigated to a level less than significant with implementation of Mitigation Measure TRA-1.
- D. **Mitigation Measure(s)**

Mitigation Measure TRA-1 Prepare a TMP for Construction

6.6.3 Increase Exposure – Wildfires

- A. **Potential Impact.** Construction would occur within a Very High Fire Hazard Severity Zone (VHFHSZ), and although unlikely, could indirectly expose construction workers to an increased risk of loss, injury, or death involving wildland fires.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.8 of the Draft EIR, the Project's potentially significant wildfire exposure impact would be mitigated to a level less than significant with implementation of Mitigation Measure WLD-1.
- D. **Mitigation Measure(s)**

Mitigation Measure WLD-1 Provide Accessible Fire Suppression Equipment

6.7 Hydrology, Flooding and Water Quality

6.7.1 Soil Erosion and Water Quality

- A. **Potential Impact.** During construction, the Project would be classified as Risk Level 2 and soil erosion and sediment transport could result in impacts to water quality. In addition, temporary alterations to existing drainage patterns may result during construction. The increased volume, velocity, and discharge duration of stormwater runoff from developed areas could accelerate downstream erosion or alter existing drainage flows that could increase downstream scour.

Once constructed, the addition of a second platform at the Simi Valley station, in conjunction with the construction of new track and drainage infrastructure, has the potential to add 1.23 acre (53,579 square feet) of impervious area, which could result in localized increases in peak runoff. Depending on the timing and quantity of flow, these increases could impact the City's storm drain system, and downstream receiving waters, and, although unlikely, could result in localized flooding.

- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.9 of the Draft EIR, the Project's potentially significant soil erosion and water quality impacts would be mitigated to a level less than significant with implementation Mitigation Measures HWQ-1, HWQ-2 and HWQ-3.
- D. **Mitigation Measure(s)**

Mitigation Measure HWQ-1 Prepare and Implement a Project-Specific SWPPP

Mitigation Measure HWQ-2 Prepare a Final Drainage Plan

Mitigation Measure HWQ-3 Prepare a H&H Analysis

6.7.2 Floodplain Encroachment

- A. **Potential Impact.** The Project study area intersects multiple flood zones. Construction of the Project within the 100-year floodplain could alter the existing flooding conditions within eastern portions of the Project study area.

During construction and, in the unlikely event that the site is inundated, construction-related pollutants have potential to get washed from the Project study area into waterways. Construction related pollutants, such as grease and oil from vehicles and equipment, paint, lubricants, and construction debris and dust have potential to enter the storm drain system and waterways via stormwater runoff.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.9 of the Draft EIR, the Project's potentially significant floodplain encroachment impact would be mitigated to a level less than significant with implementation of Mitigation Measure HWQ-2 and HWQ-3.
- D. **Mitigation Measure(s)**

Mitigation Measure HWQ-2 Prepare a Final Drainage Plan

Mitigation Measure HWQ-3 Prepare an H&H Analysis

6.8 Land Use and Planning

6.8.1 Division of Established Communities

- A. **Potential Impact.** During construction of the Project, disruptions to mobility and circulation within established communities and neighborhoods would occur.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.

- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.10 of the Draft EIR, the Project's potentially significant impact would be mitigated to a level less than significant with implementation of Mitigation Measures TRA-1 and TRA-2.

- D. Mitigation Measure(s)

Mitigation Measure TRA-1 Prepare a TMP for Construction

Mitigation Measure TRA-2 Maintain Pedestrian and Bicycle Access During Construction

6.8.2 Plan Consistency

- A. **Potential Impact.** As provided in Table 3.10-1 of the EIR, potential conflicts with goals or policies adopted for the purpose of avoiding or minimizing an adverse environmental impact could occur as a result of Project implementation.

- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.

- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.10 of the Draft EIR, temporary impacts would be mitigated to a level less than significant with implementation of Mitigation Measures AES-1, AES-2, AQ-1, BIO-1, BIO-2, BIO-3, CUL-1, CUL-2, CUL-3, PAL-1, PAL-2, PAL-3, HAZ-1, WLD-1, NV-1, NV-2, TRA-1, and TRA-2.

- D. Mitigation Measure(s)

Mitigation Measure AES-1 Temporary Screening

Mitigation Measure AES-2 Minimize Nighttime Work and Screen Direct Lighting

Mitigation Measure AQ-1 Use of Tier 4 Construction Equipment

Mitigation Measure BIO-1 Implement Biological Resource Protection Measures During Construction

Mitigation Measure BIO-2 Avoid impacts on Migratory and Nesting Birds

Mitigation Measure BIO-3 Protected Trees

Mitigation Measure CUL-1 Cultural Monitoring

Mitigation Measure CUL-2 Unanticipated Discoveries

Mitigation Measure CUL-3 Human Remains and Associated or Unassociated Funerary Objects.

Mitigation Measure PAL-1 Paleontological Monitoring

Mitigation Measure PAL-2 Paleontological Spot Checks

Mitigation Measure PAL-3	Unanticipated Discovery of Paleontological Resources
Mitigation Measure HAZ-1	HMMP
Mitigation Measure WLD-1	Provide Accessible Fire Suppression Equipment
Mitigation Measure NV-1	Employ Noise- and Vibration-reducing Measures During Construction
Mitigation Measure NV-2	Prepare a Community Notification Plan for Project Construction
Mitigation Measure TRA-1	Prepare a TMP for Construction
Mitigation Measure TRA-2	Maintain Pedestrian and Bicycle Access During Construction

6.9 Noise and Vibration

6.9.1 Noise Effects

- A. **Potential Impact.** As provided in Appendix L of this EIR, up to approximately 150 sensitive receptors would be impacted by temporary construction noise. Construction would be limited to daytime hours to the greatest extent practicable; however due to some nighttime construction activities that may occur, predicted noise levels carry the potential to exceed Federal Transit Administration's nighttime construction noise criteria of 70 A-weighted decibels equivalent sound level at adjacent residential uses.

Operation of the Project would result in increased noise levels from sources including train horn noise, traffic noise, signal bells at crossings, and wheel/rail noise from daily passenger rail operations. Project operations would involve increased passenger rail service along the railroad corridor.

- B. **Finding.** Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.11 of the Draft EIR, the Project's potentially significant noise impacts would be reduced with implementation of Mitigation Measures NV-1 through NV-4. Although adherence to these measures will minimize the Project's impact on noise and vibration; residual moderate impacts would remain significant and unavoidable.

D. **Mitigation Measure(s)**

Mitigation Measure NV-1	Employ Noise- and Vibration-reducing Measures During Construction
Mitigation Measure NV-2	Prepare a Community Notification Plan for Project Construction

Mitigation Measure NV-3 Quiet Zone Implementation

Mitigation Measure NV-4 Wayside Horns

6.9.2 Vibration Effects

- A. **Potential Impact.** Construction activities have potential to cause construction-related vibration annoyance at sensitive receptors located within approximately 73 feet of the construction zone. Nineteen of the receptors analyzed are predicted to experience annoyances from vibration during construction activities, and a maximum vibration level of 84 velocity decibels is predicted at the nearest receptor.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.11 of the Draft EIR, the Project's potentially significant ground-borne vibration impacts would be mitigated to a level less than significant with implementation of Mitigation Measures NV-1 and NV-2.
- D. **Mitigation Measure(s)**

Mitigation Measure NV-1 Employ Noise- and Vibration-reducing Measures During Construction

Mitigation Measure NV-2 Prepare a Community Notification Plan for Project Construction

6.10 Transportation and Traffic

6.10.1 Circulation System Disruptions

- A. **Potential Impact.** Construction of the Project would result in temporary disruptions to the circulation system, including transit, roadways, and active transportation in the form of temporary closures, detours, and/or reductions in roadway capacities and active transportation corridors.

The Simi Valley Transit Route 20 passes through each of these intersections, and, therefore, service disruptions could result in potentially significant impact for existing transit riders. Additionally, because of the temporary detoured traffic, the Tapo Canyon Road at East Los Angeles Avenue and Cochran Street are forecasted to operate below Level of Service C during Construction Year Project (2022) conditions.

Construction would require temporary closures at the Tapo Canyon Road, Tapo Street, Los Angeles Avenue crossings, and Hidden Ranch Drive. Except for Hidden Ranch Drive, these intersections would be fully closed to automobiles. Additionally, construction adjacent to portions of the Arroyo Simi Greenway and within the railroad right-of-way (ROW) may require temporary closure or detours west of the Simi Valley Station.

- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.

- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.12 of the Draft EIR, the Project's potentially significant circulation disruption impacts would be mitigated to a level less than significant with implementation of Mitigation Measure TRA-1.

D. **Mitigation Measure(s)**

Mitigation Measure TRA-1 Prepare a TMP for Construction

Mitigation Measure TRA-2 Maintain Pedestrian and Bicycle Access During Construction

6.10.2 Design Hazards

- A. **Potential Impact.** During the construction phases, at-grade crossings would be closed to facilitate the Project improvements, which will require detours to crossings not under construction. The temporary closure of at-grade crossings during construction has the potential to create hazardous conditions due to the disruption of traffic flow and localized pedestrian and bicycle access.

Construction-related activities of the Project would also require the delivery of off-road heavy construction-related equipment and facility materials, some of which may require transport by oversized vehicles. The use of oversize vehicles during construction-related activities could create a hazard to the public by limiting motorist views on roadways and by the obstruction of space, as these vehicles will be slow to accelerate and will require larger distances to decelerate or stop than the passenger cars.

- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.

- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.12 of the Draft EIR, the Project's potentially significant design hazard impacts would be mitigated to a level less than significant with implementation of Mitigation Measure TRA-1 and TRA-2.

D. **Mitigation Measure(s)**

Mitigation Measure TRA-1 Prepare a TMP for Construction

Mitigation Measure TRA-2 Maintain Pedestrian and Bicycle Access During Construction

6.10.3 Emergency Access and Queuing Impacts

- A. **Potential Impact.** During Project construction, increased construction activity within the Project study area may result in roadway delays, and grade crossing closures would require detours, which could temporarily impact emergency access. Based on the analysis of Project operations, the projected northbound traffic queuing during Opening Year (2024) conditions and Future Year (2045) conditions at the Tapo Canyon Road and Tapo Street at-grade crossings could result in potential spillover impacts.

- B. **Finding.** Pursuant to CEQA Guidelines Section 15091 (a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.12 of the Draft EIR, the Project's potentially significant emergency access and queuing impacts would be mitigated to a level less than significant with implementation of Mitigation Measures TRA-1 and TRA-3.
- D. **Mitigation Measure(s)**

Mitigation Measure TRA-1 Prepare a TMP for Construction

Mitigation Measure TRA-3 Implement Pre-signals or Comparable Measure(s).

6.11 Tribal Cultural Resources

6.11.1 Tribal Cultural Resources

- A. **Potential Impact.** Although unlikely, potentially significant archaeological materials could be encountered during Project-related ground disturbing activities, including those that are found to be prehistoric or Native American in origin and/or Native American human remains are found in proximity to the Project footprint.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.13 of the EIR, the Project's potentially significant impacts on tribal cultural resources would be mitigated to a level less than significant with implementation of Mitigation Measures CUL-2 and CUL-3.
- D. **Mitigation Measure(s)**

Mitigation Measure CUL-2 Unanticipated Discoveries

**Mitigation Measure CUL-3 Human Remains and Associated or Unassociated
Funerary Objects**

6.12 Wildfire

6.12.1 Emergency Plans

- A. **Potential Impact.** The increased movement of construction vehicles and equipment through the Project study area may result in temporary impacts to surrounding roadways, which could result in subsequent delays in emergency service providers' response times, including VHFHSZ response times to calls for fire protection services. In the event of an emergency, Ventura County Fire Department (VCFD) Stations 43 and 46 would be the most likely to respond in the event of an emergency.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the EIR.

- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.15 of the Draft EIR, the Project's potentially significant wildfire impacts would be mitigated to a level less than significant with implementation of Mitigation Measure TRA-1.

D. **Mitigation Measure(s)**

Mitigation Measure TRA-1 Prepare a TMP for Construction

6.12.2 Wildfire Risk

- A. **Potential Impact.** Portions of the railroad ROW contain trees along the edge and the eastern end of the Project is located within a VHFHSZ. Given the Project would be constructed during portions of the year characterized by elevated fire danger, the Project's construction activities carries the potential to exacerbate wildfire hazards.
- B. **Finding.** Pursuant to CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
- C. **Facts in Support of Finding.** Based on the analysis provided in Section 3.15 of the Draft EIR, the Project's potentially significant wildfire impacts would be mitigated to a level less than significant with implementation of Mitigation Measures TRA-1 and WLD-1.

D. **Mitigation Measure(s)**

Mitigation Measure TRA 1 Prepare a TMP for Construction

Mitigation Measure WLD-1 Provide Accessible Fire Suppression Equipment

7 Cumulative Impacts

7.1 Noise and Vibration

As analyzed in Chapter 4 of the Draft EIR, although implementation of Mitigation Measure NV-1 to employ noise and vibration reduction measures and Mitigation Measure NV-2 to prepare and maintain a community notification plan would reduce Project noise impacts during construction, the impacts resulting from nighttime construction would remain significant and unavoidable for multiple locations.

In combination with other projects, even following the application of the proposed mitigation, construction-related noise impacts could be cumulatively significant and unavoidable during nighttime construction (see Section 6.9).

8 Effects Found Not to Be Significant

CEQA Guidelines Section 15128 require that an EIR contain a brief statement disclosing the reasons why various possible significant effects of the project were found not to be significant, and therefore would not be discussed in detail in the EIR. Chapter 7 of the Draft EIR identifies the following issues areas that will not be impacted by the Project – Agriculture and Forestry Resources, Mineral Resources, Population and Housing, Public Services, Recreation.

9 Findings Regarding Feasible Alternatives

Pursuant to CEQA Guidelines Section 15126.6(a), EIRs must “describe a range of reasonable alternatives to the project, or to the location of this project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

The alternatives to the Project are evaluated in Chapter 5 of the Draft EIR in terms of their ability to meet the basic objectives of the Project and eliminate or further reduce its significant environmental effects. Based on these parameters, the following alternatives were considered and analyzed in the EIR:

1. No Project Alternative
2. Alternative 1 – Reduced Main Track 2 Platform and Construction Staging

9.1 No Project Alternative

The CEQA Guidelines require analysis of the no project alternative (PRC Section 15126). According to Section 15126.6(e), “the specific alternative of ‘no project’ shall also be evaluated along with its impacts. The ‘no project’ analysis shall discuss the existing conditions at the time the Notice of Preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

Compared with the Project, under the No Project Alternative none of the improvements to the Simi Valley Station would be constructed and existing conditions would remain within the existing railroad corridor, including existing operational limitations.

- A. **Finding.** The No Build Alternative would fail to meet any of the Project objectives. It is found pursuant to PRC Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, make the No Project Alternative infeasible.
- B. **Facts in Support of Findings.** Because the No Project Alternative would not implement any of the railroad, at-grade crossing, or platform upgrades proposed under the Project, enhancements to at-grade crossing safety, service frequency, and reliability would not be improved. Additionally, due to the constraints of the existing rail infrastructure, operational capacity, safety, and efficiency would not be enhanced to meet the demands of the Ventura County Line and broader rail system; thereby further constraining SCRRA’s ability to accommodate forecasted travel demands on Metrolink’s passenger service. The lack of upgrades to the Sequoia Avenue, Tapo Canyon Road, Tapo Street, East Los Angeles Avenue, and Hidden Ranch Drive at-grade railroad crossings may limit the City’s ability to obtain an overall Quiet Zone Risk Index score below the Risk Index With Horns threshold to enable the City to implement quiet zones in the future.

Furthermore, the No Project Alternative would not be consistent with the SCORE Phase 1, 30-minute service goals; and as a project identified within the *2020–2045 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)* (Southern California Association of Governments [SCAG] 2020a), would not support the goal for more frequent rail service set out in the *California State Rail Plan* (Caltrans 2018), or contribute to the 2020-2045 RTP/SCS greenhouse gases (GHG) reduction goals for the SCAG region and statewide GHG

reduction targets. Given future projections of increased rail service demand and implementation of other transportation related projects within the region, the No Project Alternative would result in a disjointed rail system causing operational inefficiencies and safety issues.

For the reasons stated above, the No Project Alternative would ultimately contribute to a longer-term worsening of existing conditions related to transportation and traffic congestion, increased criteria air quality pollutants, and regional GHG emissions.

9.2 Alternative 1 – Reduced Main Track 2 Platform and Construction Staging

The purpose of this alternative is to consider an alternative design that would achieve reductions in ROW impact. The Alternative 1 design would construct a new, narrower MT-2 platform at the Simi Valley Station. The narrower, nonstandard MT-2 platform would still include all standard safety features (e.g. yellow ‘do not cross’ line, truncated domes, directional train boarding tiles, handrails, etc.). Alternative 1 would include a 14-foot-wide platform compared with the standard 16-foot-wide platform. Additionally, the northern ramp wall for the MT-2 ramp would be situated under the reduced MT-2 platform which would reduce 1.5-feet of ROW acquisition and remove the temporary construction easement for the staging area needed from a multifamily property located south of the newly proposed MT-2 platform at 5008 Arroyo Lane. This alternative would also consolidate construction staging and laydown, as required, in the northwest portion of the parking lot at the Simi Valley Station (see Figure 5-1 in the EIR).

Alternative 1 would meet the basic objectives of the Project.

- A. **Finding.** It is found pursuant to PRC Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, make Alternative 1 a feasible Project alternative. Moreover, CEQA Guidelines Section 15126.6(e)(2) states that “if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Even though Alternative 1 would be required to implement the same mitigation measures as the proposed Project, Alternative 1 would be capable of reducing land use, visual, drainage, and floodplain encroachment impacts when compared to the proposed Project. Therefore, Alternative 1 is the environmentally superior alternative. Given that Alternative 1 would both a) meet the basic objectives of the Project and b) reduce potentially significant impacts when compared to the proposed Project, SCRRRA has made the determination to pursue Alternative 1 as the selected project.
- B. **Facts in Support of Findings.** Under Alternative 1, the reduction of the ROW acquisition, removal of the temporary construction easement, and relocation of a portion of the staging area impacting the multifamily property south of the proposed platform would minimize impacts to land use, visual, drainage, and noise resources, particularly during construction. The narrower platform is also expected to result in reduced local drainage and hydrology impacts. However, the overall impacts on aesthetics, biological resources, cultural resources, energy, geology/soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, public services, transportation, tribal cultural resources, utilities and service systems, and wildfire would be similar to the Project. Therefore, the same mitigation measures and regulatory approvals recommended for the Project would apply to this alternative.

While this alternative would reduce ROW costs, the narrower design for the new platform would have less capacity for riders on- and off-boarding passenger trains; and may result in less efficient passenger flow compared to a platformed that is of standard width. Notwithstanding these considerations, Alternative 1 is feasible and would meet the Project objectives to enhance at-grade crossing safety, service frequency, and reliability since this alternative would implement the same railroad, at-grade crossing and platform improvements proposed under the Project. Therefore, this alternative would be consistent with the SCORE Phase 1, 30-minute service goals; and as a project identified within the 2020–2045 RTP/SCS (SCAG 2020a), support the goal for more frequent rail service set out in the California State Rail Plan (Caltrans 2018), and contribute to the 2020-2045 RTP/SCS GHG reduction goals for the SCAG region and statewide GHG reduction targets.

For the reasons stated above, the SCRRA finds that this alternative would both a) meet the basic objectives of the Project and b) reduce potentially significant impacts when compared to the proposed Project. As such, SCRRA has concluded that Alternative 1 is environmentally superior over the Project as described in Chapter 2 of the Draft EIR.

9.3 Findings Regarding Range of Alternatives

- A. **Finding.** The EIR considers a reasonable range of alternatives as more fully described in Section 5.2, Alternatives Screening Process, of the Draft EIR. Substantial evidence supports the conclusion of the EIR regarding the alternatives considered and rejected. Substantial evidence supports the conclusion that Alternative 1 would both a) meet the basic objectives of the Project and b) reduce potentially significant impacts when compared to the proposed Project.

Facts in Support of Findings. The purpose of studying alternatives to the Project is to identify alternatives that would substantially reduce or avoid the significant environmental impacts of the Project. Substantial evidence shows that all potentially significant environmental impacts of the Project are mitigated below significant levels. There are no feasible alternatives that would avoid the significant and unavoidable impact identified for the Project. Consequently, the range of alternatives studied in the EIR is reasonable because it included alternatives to the Project that substantially reduce or avoid impacts. As the CEQA Lead Agency, SCRRA has determined that Alternative 1 is the CEQA environmentally superior alternative and preferred alternative, and, as such, SCRRA has made the determination to pursue Alternative 1 as the selected project. Although selection and implementation of Alternative 1 would result in reduced environmental impacts when compared to the proposed Project, Alternative 1 would be subject to the same mitigation measures and regulatory approvals as the proposed Project.

Findings Regarding Growth Inducing Impacts

Substantial growth impacts could be established through the provision of infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

SCORE is identified in the 2020-2045 RTP/SCS and, as such, has been included in the region's planned development and would not generate substantial growth from that already considered in the 2020-2045 RTP/SCS (SCAG 2020a). The Project would accommodate the forecasted increase in train

movements and passenger volumes on the Ventura County Line. Any future population growth in the region and/or Project study area (i.e., future land use development) is anticipated to be consistent with the City's General Plan and the 2020-2045 RTP/SCS. Therefore, the Project would not induce unplanned growth that could otherwise result in significant or adverse secondary impacts (see Chapter 6 of the Draft EIR).

Findings Regarding Significant Irreversible Environmental Changes

Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the associated impacts that this consumption could have on future generations. Irreversible impacts result primarily from the use or destruction of a specific resource (e.g., energy and minerals) that cannot be replaced within a reasonable time frame. Irretrievable resource commitments involve the loss in value of an affected resource that cannot be restored as a result of the action (e.g., extinction of a threatened or endangered species or the disturbance of a cultural resource).

The construction and implementation of the Project would entail the irreversible and irretrievable commitment of some land, energy, and human resources. These resources include the following:

- Commitment of land for transportation purposes;
- Commitment of natural resources during construction activities associated with the Project, including the use of construction materials (e.g., steel, ballast, concrete, etc.); and,
- Consumption of nonrenewable energy resources, mainly diesel and electricity, as a result of construction, operation, and maintenance of the Project.

The land used for the Project is currently dedicated for transportation purposes and maximizing the use of the available ROW as proposed under the Project would be an efficient use of the land. Beyond the Project's commitment of land resources, the Project would result in a short-term increase in the use of energy to manufacture, deliver, and construct the proposed improvements. The manufacturing of materials used to construct the Project and energy in the form of natural gas, petroleum products, and electricity consumed during construction and operation would contribute to the incremental depletion of renewable and non-renewable resources. Steel, concrete, and other materials would be recycled, to the extent feasible; however, the loss of these resources is considered irreversible because their reuse for some other purpose than the Project would be highly unlikely or impossible. Based on these considerations, the Project constitutes an irreversible and irretrievable commitment of natural resources.

The Project's use of non-renewable energy sources, such as diesel fuel, is considered an irreversible, irretrievable commitment of these petroleum resources. The commitment of resources to construct and operate the Project is based on the belief that residents, employees, and visitors would benefit from the improved efficiency, accessibility, safety, and environmental quality of the transportation system in Southern California. These benefits are anticipated to substantially outweigh any irreversible or irretrievable commitment of non-renewable resources.

10 Statement of Overriding Considerations

Pursuant to PRC Section 21081(b) and CEQA Guidelines Section 15093(a) and (b), SCRRA is required to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of the Project against its unavoidable environmental risks when determining whether to approve the Project.

For the foregoing reasons, SCRRA finds that the unavoidable significant environmental impacts pertaining to temporary nighttime construction noise are outweighed by these considerable benefits because Project as implemented under Alternative 1 would:

- Fulfill the SCORE Program need for substantial investments in rail infrastructure in the Southern California region to upgrade the Metrolink system and meet current and future needs of the traveling public
- Provide capacity enhancements to accommodate the forecasted increase in train movements and associated passenger volumes
- Generate employment opportunities during the construction and operation phase of the Project, which would create both short-term and long-term jobs for the City, as well as help lower the current rates of unemployment
- Compliment planned development in the Project study area consistent with the City's General Plan, which encourages transit-oriented development in the City
- Facilitate the forecasted increase in multi-modal transportation needs throughout the region
- Increase passenger capacity at the existing Simi Valley Station and transit experience
- Expand access to jobs and destinations
- Improve regional connectivity to key destinations in Southern California
- Enhance passenger rail service reliability and frequency would be distributed equitability across all populations
- Improve pedestrian and cycling safety with enhanced mobility options and safety features
- Improve regional and local roadways by reducing single-occupancy vehicle use
- Provide long-term noise reduction benefits through the implementation of quiet zones along the railroad corridor
- Indirect contribution to cumulative benefits for the region, including a reduction of GHG emissions by removing vehicle miles traveled in the region
- Minimize the placement of new rail infrastructure within FEMA designated flood areas

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