



APPENDIX N. PUBLIC COMMENTS RECEIVED ON THE DRAFT EA AND RESPONSES

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Attachment N

PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT AND VALLEY METRO'S RESPONSE

1.0 INTRODUCTION

Valley Metro, in coordination with the FTA, prepared an Environmental Assessment (EA) for the South Central Light Rail Extension project that evaluated the environmental features and potential impacts on the environment related to the construction and operation of the light rail project (referred to in the EA as the Project). In May 2016, FTA approved the EA for public circulation and comment. Valley Metro and the City of Phoenix initiated a 30-day public review and comment period (May 10 through June 13, 2016) and held a public open house meeting on May 25, 2016. During the comment period, the EA was available in print at the South Mountain Community Center and Nina Mason Pulliam Rio Salado Audubon Center and was available for download from Valley Metro's website: http://www.valleymetro.org/projects_and_planning/project_detail/south_central. In addition, Valley Metro provided electronic copies of the EA at the public open house meeting. The EA will remain on Valley Metro's website through the duration of the Project.

Valley Metro received nine comments at the Project's open house meeting, one via e-mail and six letters. The comments that Valley Metro received do not require any revisions to the EA; however, clarifications on the EA in response to public comments are noted below. Several comments were received pertaining to the South Central Neighborhoods Transit Health Impact Assessment (SCNTHIA), noise concerns at St. Catherine of Siena School and Church and St. John Bosco Church, and the availability of materials in alternate language. Because the comments were similar, a master response in Section 2.0 was developed to address these broad issue areas in a comprehensive manner. Section 3.0 provides a response to each comment received on all topics. All comments and responses will be part of the Finding of No Significant Impact (FONSI) and will be attached to the EA. The personal information for the commenters has been redacted.

2.0 MASTER RESPONSES PERTAINING TO SCNTHIA

2.1 Master Response 1: SCNTHIA and its relationship to the EA

General Comment: Several Commenters asked why SCNTHIA recommendations (pathways) were not taken into account in the EA.

Master Response: Valley Metro and the City of Phoenix acknowledge the importance of the SCNTHIA study and its recommendations in the Project planning. While some elements of the SCNTHIA are similar to items analyzed in the EA, such as air quality concerns (Section 3.7.1.2 of the EA) and exposure to hazardous materials (Section 3.15.1 of the EA), many SCNTHIA elements differ from EA elements or are outside the scope of an EA. SCNTHIA is not a technical study with a health risk assessment. Accordingly, only to the extent applicable, the Final Recommendations on pages 136 to 149 of the SCNTHIA are policy-related statements that Valley Metro considered in its design and development of the proposed corridor. Many of the SCNTHIA recommendations are included in Valley Metro's Urban Design Guidelines, the Light Rail Design Criteria Manual and the Business Assistance Program and the EA, as appropriate.

An EA does not evaluate certain aspects, identified in the SCNTHIA, such as individual lifestyle, stray dog control, encouraging private medical practices to locate along the light rail alignments, engaging rental property owners to provide housing for low-income tenants or regional fare structure. Specific SCNTHIA recommendations and how they are or are not within the scope of the EA are discussed below in Master Responses 2 through 7.

2.2 Master Response 2: Pathway #1: Landscape/Shade/Safety Recommendations from the SCNTHIA Report

General Comment: Several commenters had questions related to the SCNTHIA Pathway #1, Landscape/Shade/Safety, and why it was not included in the EA. Below are the elements that make up Pathway #1:

- 1.1 Install extensive, improved lighting features (such as LED and solar lighting) at and around all bus stops and proposed light rail stations to enhance levels of safety, visibility, and perceptions of comfort.
- 1.2 Install extensive, solar powered LED lighting features along pedestrian and bicycle routes throughout the study area.
- 1.3 Incorporate walkability and bikeability awareness and education efforts into the City of Phoenix Bicycle Master Plan and future Pedestrian Master Plan.
- 1.4 Explore unique opportunities to increase shade with entities such as community-based organization and businesses to meet and exceed City of Phoenix Tree and Shade Master Plan goal of 25 percent canopy coverage by 2025.
- 1.5 Explore partnerships with local businesses to fund expanded construction of cooling centers that utilize solar powered fans/misters/water fountains at existing and future light rail stations and bus stops.
- 1.6 Prioritize implementation of the Phoenix Complete Streets Policy in and near the study area to incorporate healthy design elements including, but not limited to: traffic calming; speed limit reduction; road diets; safe street crossings; bicycle lanes and protected bicycle lanes; wide sidewalks; shade; and way finding signage. Include these amenities in budget proposals.
- 1.7 Utilize alternative building materials and structures for light rail stations and bus stops that help to mitigate heat retention.
- 1.8 Enforce rules for unleashed and stray dogs and enhance education efforts for responsible dog ownership. Consider other evidence-based measures to control stray animals. Work with residents to provide instruction as to how to report loose dogs.
- 1.9 Install 911 emergency panic call buttons, sirens, and lights at proposed station platforms and on trains.

Master Response: Elements 1.1 and 1.2: Valley Metro’s current design standards, which include LED-based light fixtures for all lighting elements (e.g., stations and street lights), provide for lighting at all stations and station entrances. Additionally, any street or sidewalk lighting located directly within the corridor that is below current City of Phoenix standards will be upgraded to comply. The installation of extensive solar powered lighting along bicycle and pedestrian routes is a City of Phoenix decision.

Element 1.3: The Project will retain the existing bicycle lanes and will add bicycle lanes in several locations where none currently exist to provide continuous bicycle facilities in both directions on 1st Avenue and Central Avenue from Madison Street to Baseline Road. Additionally, by increasing the number of signalized crosswalks within the 5-mile South Central corridor, there will be more locations than exist today for pedestrians to safely cross Central Avenue. The Project will have beneficial impacts on pedestrians and bicycles. The cumulative benefits of the pedestrian and bicycle improvements associated with the Project increase the overall “walkability and bikeability” within the corridor. For more information on bicycle lanes, see Section 3.6.3.3 of the EA and for more information on pedestrian enhancements see Section 3.6.3.3 of the EA.

Elements 1.4, 1.5, and 1.7: As defined in Valley Metro’s Urban Design Guidelines and Light Rail Transit Design Criteria Manual, shading at rail stations will be provided. Furthermore, Valley Metro’s standard light rail station design was developed in a manner to provide the greatest relief from direct sunlight during the summer months and minimize the effect of heat retention. Water fountains are provided at all light rail stations for passenger comfort. Refinements to station design will occur during final design of the Project.

Elements 1.6: The development of “complete streets” is the responsibility of the City of Phoenix. The Project, however, will contribute some elements of complete streets such as additional bike lanes, landscaping to improve

the pedestrian environment, and providing an additional transit option.

Element 1.8: Reducing and removing stray dogs is not part of an EA analysis because it is not associated with an environmental impact related to the Project. Animal control (i.e., stray dogs) is the responsibility of Maricopa County Animal Care and Control.

Element 1.9: The Valley Metro Light Rail Design Criteria Manual requires all stations to have lighting and emergency call boxes that are connected to Valley Metro's Operations Control Center, and have direct communication with the City of Phoenix police and fire departments. The light rail vehicles include passenger emergency reporting devices that allow passengers to communicate with the train operator. For additional information on Safety and Security Measures see Section 3.19 of the EA. Any modifications to existing bus stops are separate from the Project and will be the responsibility of the City of Phoenix.

2.3 Master Response 3: Pathway #2: Household Transportation Cost Recommendations from the SCNTHIA Report

General Comment: Several commenters had questions related to the SCNTHIA Pathway #2, Household Transportation Costs, and why it was not included in the EA. Below are the elements that make up Pathway #2:

- 2.1: Facilitate reimbursement of transportation costs for AHCCCS members
- 2.2: Use hospital community benefit investments for transit
- 2.3: Expand use of Employee Pass Program
- 2.4: Promote use of Valley Metro Reduced Fare Program for those with disabilities.
- 2.5: Expand categorical eligibility for Reduced Fare Program.
- 2.6: Offer discounted unlimited ridership passes in longer durations (3 month, 6 month, and/or 1 year)

Master Response: Elements 2.1 through 2.6: Valley Metro will take into consideration public comment prior to making fare decisions. Passenger fares are established through regional policy and are not established on a project-by-project basis. Consistent with regional policy, the fare structure for the Project will be the same as the overall light rail fare policy. Fare decisions are conducted separately from and outside the NEPA environmental review process; therefore fares are not evaluated in the EA. Valley Metro will ensure that any fare decisions adhere to applicable FTA Title VI requirements and Valley Metro Fare Equity Policy.

As per Valley Metro's Fare Equity Policy and Title VI regulations (49 CFR Part 21), any future consideration of adjustments to the regional fare policy for light rail or other transit modes will be evaluated to determine whether potential changes to existing transit fares will have a disproportionate impact on minority and/or low-income populations.

For more information about Valley Metro fares see: http://www.valleymetro.org/paying_your_fare/fare_options/ and http://www.valleymetro.org/accessibility/reduced_fare_program/.

More information on employee pass program can be found here: http://www.valleymetro.org/employer_programs/platinum_pass

More information on the existing reduced fare programs can be found here: http://www.valleymetro.org/accessibility/reduced_fare_program

2.4 Master Response 4: Pathway #3: Business and Employment Recommendations from the SCNTHIA Report

General Comment: Several commenters had questions related to the SCNTHIA Pathway #3, Business and Employment, and why it was not included in the EA. Below are the elements that make up Pathway #3:

- 3.1: Provide guidance and assistance for existing business retention and new business development along light

rail extension.

- 3.2: Work with community organizations and schools to produce and display public art during construction to enhance pedestrian and business activity.
- 3.3; Provide walkable/safe travel paths along the construction area, especially for special needs populations (walkers, wheelchairs, strollers).
- 3.4; Provide community-gathering events during light rail construction (e.g., Ciclovía/open street/play street).

Master Response: Element 3.1: Valley Metro, the City of Phoenix and other partners will work together to implement customized business assistance programs for light rail construction projects; including for the South Central Light Rail Extension project (see Section 3.20, *Construction*, and Table 3-48, *Construction-Related Impacts/Mitigation*, of the EA for further discussion). The goal of these programs is to assist business owners by providing tools that can help them continue to remain healthy and well-positioned to maintain business during construction. Some of the tools used are business signage, business assessments, and marketing assistance. The final program will be documented in Valley Metro's Business Assistance Program and the Public Involvement Plan.

As stated in Section 3.4.3 *Economic Effect*, of the EA, the Project is anticipated to have positive local and regional economic and growth-inducing effects. The Project would enhance the potential for land use intensification by improving transit accessibility throughout the study area and by providing connections with other parts of the existing and planned regional transit system. The City of Phoenix, along with stakeholders, anticipates that the Project would have positive effects on new and existing commercial and residential development near proposed stations and the light rail alignment.

Element 3.2: Providing public art during construction is not an area evaluated as part of an EA. However, Valley Metro will discuss opportunities for the installation of public art during construction with the community as part of the development of the Project's Business Assistance Program and Public Involvement Plan. Inclusion of public art during and after construction would be communicated through project and station updates on Valley Metro's website. As art is not an eligible use of FTA funds under the FAST Act, any public art installation must be funded locally.

Element 3.3: Valley Metro will construct or maintain paths sufficient to allow for traversing an area. Access to community services and facilities would be maintained during construction, including access for special needs populations. Please note some temporary closures will likely occur (see Table 3-48, *Construction-Related Impacts/Mitigation*, in the EA). As stated in Section 3.13.3 of the EA, *Community Impacts*, the Project would cause no permanent barriers to the movement of people, goods, and services in the area and no permanent disruption of the community.

Element 3.4: Providing community events during construction is outside the scope of the Project. However, Valley Metro will consider incorporating it in the Public Involvement Plan during construction.

2.5 Master Response 5: Pathway #4: Housing Recommendations from the SCNTHIA Report

General Comment: Several commenters had questions related to the SCNTHIA Pathway #4, Housing, and why it was not included in the EA. Below are the elements that make up Pathway #4:

- 4.1 Prioritize affordable mixed-used, mixed-income, higher density housing development along transit corridors already included in the current U.S. Department of Housing and Urban Development (HUD) and the Arizona Department of Housing's Five Year Consolidated Plan.
- 4.2 Adopt the Transit-Oriented Development (TOD) overlay district (or the Walkable Urban [WU] Code when complete) for the South Central Transit Corridor.
- 4.3 Include in the Qualified Allocation Plan a general goal of prioritizing the allocation of tax credits to developments along transit corridors and highly walkable/bikeable neighborhoods.

- 4.4 To minimize displacement, explore a property tax freeze or cap for existing low-income homeowners whose home values may increase upon LRT corridor completion and provide tax incentives to rental properties to maintain the number of low-income units available.
- 4.5 Enhance outreach to transit dependent communities for input on annual updates of the Qualified Allocation Plan to help prioritize the allocation of funding within the Low Income Tax Credit Program.
- 4.6 Engage rental property owners, especially those providing housing to low-income tenants, to promote the Valley Metro Reduced Fare Program.

Master Response: Elements 4.1 and 4.2: Valley Metro is a public nonprofit corporation formed by the cities of Glendale, Mesa, Phoenix and Tempe to manage design, construction and operation of the Light Rail Transit System within the metropolitan area. The City of Phoenix has the authority to conduct land use and economic development planning, including TOD application of the City’s Walkable Urban Planning Overlay. The City of Phoenix, as discussed in Chapter 1.0 of the EA, *Purpose and Need*, has made transit-oriented and infill development a priority along its key transit corridors, including the Project corridor. To encourage such development, the City has created both a Transit Oriented Development Overlay District and an Infill Development Overlay District. The overlay districts, which encompass large portions of the Project area, have additional development requirements to encourage the dense, mixed-use development that the Project would support.

Elements 4.3, 4.4 and 4.5 are not items evaluated in an EA because they concern financial or tax policies, not environmental impacts. Qualified Allocation Plan, Low Income Tax Credit Program, tax incentives, and property tax controls are outside the scope of an environmental analysis for a public transit Project.

Element 4.6: Valley Metro promotes the Reduced Fare Rate Program in the Transit Book, the Valley Metro website and on signs in transit vehicles. Public outreach for the Valley Metro Reduced Fare Program is outside the scope of an environmental assessment for the Project.

2.6 Master Response 6: Pathway #5: Access to Services and Resources Recommendations from the SCNTHIA Report

General Comment: Several commenters had questions related to the SCNTHIA Pathway #5, Housing, and why it was not included in the EA. Below are the elements that make up Pathway #5:

- 5.1 Encourage and incentivize medical practices (especially specialists) that accept AHCCCS to locate along the light rail.
- 5.2 Valley Metro should re-establish its Disability Advisory Council to develop recommendations to address the special needs for persons with disabilities.
- 5.3 Conduct a feasibility study and initiate a pilot project for a Neighborhood Circulator route in the South Central/South Mountain corridor between grocery stores, light rail stations, and residential areas.
- 5.4 Conduct outreach to food vendors in the study area to help them become authorized WIC grocery vendors.
- 5.5 Encourage and provide incentives for new farmers’ markets that accept SNAP benefits to locate in the study area’s low supermarket access areas.
- 5.6 Actively explore funding (e.g., Healthy Food Financing Initiative; Healthy Store Program) to open more grocery stores/supermarkets and/or encourage smaller convenience stores that offer fresh produce within the study area’s lower supermarket access areas – especially near transit stops.
- 5.7 Actively explore funding opportunities to improve, enhance, and add to existing park equipment and infrastructure to increase recreational opportunities, community safety, and personal well-being.
- 5.8 Establish Safe Routes to School projects from key light rail stations to safely link transit riding students from their homes to nearby schools and playgrounds.
- 5.9 Strengthen community engagement plans and protocols to engage neighborhood residents in the review of bus level of service modifications in the study area.
- 5.10 Investigate the feasibility of shared-use agreements to open playgrounds and other school facilities as

community recreation and gathering spaces.

Master Response: A large part of the purpose and need of the Project is to improve access and connectivity to activity centers in the South Central corridor and to regional employment centers and activity destinations. Furthermore, the purpose and need of the Project includes more reliable transit service, and improving mobility for low-income, minority, and transit-dependent populations—all of which are related to “access” (See Chapter 1.0 of the EA, *Purpose and Need*, specifically Sections 1.2 and 1.3). The Project is related to new transit only and does not include housing or housing elements.

Elements 5.1, 5.4, 5.6 through 5.7 and 5.10: Encouraging medical practices to locate along the rail corridor, recruiting healthy food providers to become WIC vendors, recruiting farmers’ markets to accept SNAP benefits, exploring funding to support development of healthy food retailers, improving and expanding park infrastructure, and exploring shared-use agreements to improve access to safe playgrounds are not related to an environmental impact caused by the Project and are outside the scope of the EA. The City of Phoenix, along with stakeholders, anticipates that the Project would have positive effects on new and existing commercial development near proposed stations and the light rail alignment, which may include food-based commercial development.

Element 5.2: Valley Metro is establishing an Accessibility Advisory Group. However, this is a separate effort from the Project. This information is not analyzed in the EA, but information about the Valley Metro Accessibility Advisory Group can be found here: <http://www.valleymetro.org/accessibility/vmaag>.

Element 5.3: The City of Phoenix is responsible for local fixed-route bus and circulator planning within the City’s planning area. A neighborhood circular route is not currently planned for the area; however, additional local transit planning efforts are ongoing through the Phoenix Transit 2050 Plan. These planning efforts are outside the scope of the EA (see MR-1); however, the EA does indicate that there would be no adverse impacts on transit (Section 3.6.3.5, *Transit*) but would result in benefits including a new, convenient and reliable transit option with enhanced connectivity and access.

Element 5.8: The Project would provide an additional transit option in South Phoenix, which would support the goal of Safe Routes to School.

Element 5.9: This element is outside of the scope of the EA. However, it is considered through Valley Metro’s Short-Range Transit Planning Process and the Region’s Title VI Program. Through these programs opportunities for the public to provide input on service changes is ensured. Any changes to public transit services coinciding with the Project, including bus service levels, will be evaluated and presented for public review and comment at least 6 months prior to any proposed changes to the service.

2.7 Master Response 7: Pathway #6: Active Transportation Recommendations from the SCNTHIA Report

General Comment: Several commenters had questions related to the SCNTHIA Pathway #6, Active Transportation, and why it was not included in the EA. Below are the elements that make up Pathway #6:

- 6.1 Address the needs of individuals with disabilities by removing the folding seats in light rail cars to provide better and more consistent wheelchair space. Enhance and promote signage within the designated handicapped and disabled areas of light rail cars to raise riders’ awareness of the rules regarding use of the designated areas. Expand disability empowerment training for Valley Metro Security Officers to better enforce public transit policies regarding passengers with disabilities (i.e., making sure riders give up seats to those with disabilities).
- 6.2 Provide enhanced education to case managers of local organizations on how to navigate the light rail and transit system.
- 6.3 Incorporate enhanced maps and signage for pedestrians and bicyclists at existing and new light rail stops to direct transit riders to local destinations (i.e., hospitals, landmarks, streets) and nearby landmarks or

amenities in the audio announcements at LRT stations.

6.4 Install user-friendly, Americans with Disabilities Act-accessible ticket vending machines at all light rail stations.

6.5 Implement bike share hub locations near light rail stations.

6.6 Investigate additional storage in new light rail car design, especially for cold storage. Retrofit existing light rail cars or investigate alternative methods to assist riders, especially parents, caregivers, and individuals with special needs, in transporting groceries.

Master Response: Element 6.1 and 6.4: The Project will be fully compliant with the Americans with Disabilities Act (ADA) of 1990. Provisions, including ADA-accessible ticket vending machines are included in final design and are not discussed in depth in the EA. Section 3.6.3.3 of the EA, *Pedestrians and Bicyclists*, discusses ADA-compliant provisions such as crosswalks, sidewalks and pedestrian push buttons.

Element 6.3: Valley Metro provides transit system and light rail maps and wayfinding signs at all station locations. Maps and signage are customized for each station to provide passengers with location-specific information such as connecting transit services and nearby activity centers. Any improvements to these amenities are not specific to this Project and do not result in a Project impact and thus are not analyzed in the EA. However, Valley Metro will take this into consideration in planning signage at current and future stations.

Elements 6.2 and 6.5: The remaining elements of this pathway are policy-level decisions and are not directly related to an impact caused by the Project; therefore, they are not included in an EA.

Element 6.6: While we understand that this is a consideration for passenger convenience, this recommendation is for the region-wide light rail system and is not specific to an impact resulting from the Project. Therefore, it is not discussed in the EA. The light rail vehicles for this Project would be the same as the existing fleet. The light rail vehicles are air-conditioned. There are no known passenger rails systems in the United States that provide this amenity for transporting groceries.

2.8 Master Response 8: Availability of the EA and Appendices in Spanish

General Comment: Several commenters asked if the EA and/or the EA appendices were available in Spanish

Master Response: Information within the EA can be provided in Spanish upon request. Valley Metro will provide in-person interpretation services or will translate specific sections of the EA and appendices upon request.

As noted in Chapter 4.0 of the EA, *Who are the Agencies and Persons Consulted?*, Valley Metro's public notices and information provided at public meetings are printed in Spanish and English. The project website (http://www.valleymetro.org/projects_and_planning/project_detail/south_central) contains the public notices, public meeting display boards and handouts in English and Spanish. Spanish-speaking interpreters were also provided at the public meetings to provide assistance in understanding the materials and to answer any questions.

2.9 Master Response 9: Adding a goal to the EA

General Comment: Commenters asked if a fifth goal could be added to the EA's Purpose and Need to:

- "Improve public health for all light rail users in South Central Phoenix."
- "Provide economic development opportunities for residential, commercial, industrial, entertainment and leisure, and educational existing and potential beneficiaries."
- "Increasing active transportation conditions promises to support healthy lifestyles and be protective against chronic diseases."

Master Response:

The four suggested goals collectively identify the need to help support economic development within the corridor. As described in a prior response, the EA addresses how the Project increases active transportation corridors and provides economic development opportunities. The purpose of the Project is not intended specifically to address healthy lifestyles or to prevent chronic diseases; however, these may be incidental benefits of the transit Project depending on an individual's lifestyle. The purpose and need of this Project centers around connectivity and access; improved reliability; improved mobility for low-income, minority and highly transit-dependent populations; meeting future transit capacity needs and supporting current and future transit-oriented development (Chapter 1.0 of the EA, *Purpose and Need*). In addition to the purpose and need for the Project, the EA, Chapter 1.0 in Section 1.4 (*What Are The Goals for the Proposed Build Alternative?*) identified four goals and several objectives that identify improving accessibility to employment and health care facilities as well as places along the alignment that provide healthy food.

Additionally, Section 1.2.4 of the EA, *Supporting Current and Planned Economic and Transit-oriented Development in the Build Alternative Corridor as Identified in the City's 2015 General Plan*, states that the Project area is an ideal location for investment in light rail service, which can facilitate economic and transit-oriented development. Efficient and effective transit service in the study area would contribute to the area's desirability as a place to live and work and would support other public and private investments.

2.10 Master Response 10: Noise concerns at St. Catherine of Siena School and Church and St. John Bosco Church.

General Comment: Several commenters raised concerns regarding horns and whistles disrupting church services and requested consideration for noise mitigation at St. Catherine of Siena School and Church (6200 S. Central Avenue and 6513 S. Central Avenue) and St. John Bosco Church (6600 S. Central Avenue).

Master Response: As part of the Noise analysis in Section 3.8 of the EA, background noise levels were measured at specific representative locations along the alignment; a measurement was conducted near St. Catherine of Siena School and Church and St. John Bosco Church. The noise analysis takes into account vehicle noise in combination with the modeled light rail train noises to determine whether the Project will exceed FTA's thresholds as described in FTA's 2006 Transit Noise and Vibration Assessment manual. Horns are not taken into account since they are only used in case of emergency. As a safety precaution for passengers riding light rail and pedestrians crossing the street or standing on the station platform, the light rail vehicles are required to sound their bells entering and exiting each light rail station. The station closest to the church begins at the southern leg of the Southern Ave/ Central Ave intersection and the end of the station is at Lynne Lane. The end of the station is approximately 180 feet north of the church. Horns are generally used at intersections to avoid collisions and thus are only used in case of emergency.

The impact criteria vary according to existing noise levels and are based on the threshold at which the percentage of people highly annoyed by the project noise starts to become measureable. FTA noise criteria establish three categories of impact or thresholds: no impact, moderate impact and severe impact. Under the no impact category, no change in noise level would occur. The moderate impact threshold defines areas where the change in noise is noticeable, but may not be sufficient to cause a strong, adverse community reaction. The severe impact threshold defines the noise limits above which a significant percentage of the population would be highly annoyed by new noise.

The results of noise predictions showed that the noise in the area of St. Catherine of Siena School and Church would be below FTA's moderate impact threshold (i.e., no impact exceedances); therefore mitigation, including rubberized asphalt, is not required consistent with the FTA's 2006 Transit Noise and Vibration Assessment manual. For more information on the noise analysis and findings see Section 3.8.3.1 and Table 3-21 in the EA.

3.0 ALL COMMENTS AND RESPONSES

Table 1 shows all of the comments received on the EA and the responses to those comments.

TABLE 1: COMMENTS RECEIVED ON THE EA AND RESPONSES TO COMMENTS

No.	Commenter	Comment	Valley Metro Response to Comment
Community Comments			
Written Comments at Public Meeting on May 25, 2016			
1	Rosie Lopez	<p>South Phoenix Light Rail: Rubberize the South Central Ave. Roads to minimize the noise (-especially in the St. Catherine’s School and Church/area.) Thanks for all of your work! (to all of you!)</p>	<p>See Master Response 10 regarding noise concerns at St. Catherine of Siena School and Church and St. John Bosco Church.</p>
2	Victor Vidales	<p>A. Why are the environmental assessments not available in print in Spanish for the large population of Spanish Speaker who are home owners and business owners?</p> <p>B. Why does my building at 6427 S Central Not show up on Historic property inventory forms and my building at 6437 S Central Do?</p> <p>C. How will the rail/transit linkage serve as a catalyst for improved pedestrian/bicycle comfort including foliage, shade, sidewalks, bike lanes, etc.?</p>	<p>A. Valley Metro held two meetings with Victor Vidales, Raza Development Corporation and Promise AZ on June 8 and June 9, 2016. An additional participant, Shannon Scutari (representative of the Sustainability Communities Collaborative), attended the meeting on June 9. At the meeting on June 8, the EA comments, including availability of the EA in Spanish were discussed. The response provided in Master Response #8 is reflective of the discussion in the meetings.</p> <p>B. Based on the guidelines for listing on the National Register of Historic Places (NRHP), the evaluation examined properties that meet a 50-year age criterion for consideration of NRHP eligibility. Because the Project will begin operation in 2023, the age criterion was defined as pre-1974 (see Section 3.10.1.4, <i>National Register Listed and Eligible Properties within the APE</i>). As noted in the EA’s Appendix C: <i>Property Parcels in the Area of Potential Effects</i>, the building at 6427 S. Central Avenue was constructed in 1980 (Maricopa County Assessor Parcel Data Information) and is outside of the historic period, and therefore not inventoried. Additionally, if a property is not at least 50 years old, it must meet Criteria Consideration G for “Properties that Have Achieved Significance within the Past 50 Years,” if it is of exceptional importance. The building at 6437 S. Central Avenue was built in 1957 and is within the age criterion but does not meet Criteria Consideration G; therefore, no historic property inventory form was prepared for 6437 S. Central Avenue.</p> <p>C. The Project will have beneficial impacts on pedestrians and cyclists. The Project will maintain or upgrade pedestrian facilities such as ramps, sidewalks, crosswalks and other Americans with Disabilities Act-compliant provisions (see Section 3.6.3.3 of the EA, <i>Pedestrians and Bicyclists</i>). Additionally, pedestrian signals will be added at all proposed signalized intersections as well as at light rail stations. The Project will retain the existing bicycle lanes and will add bicycle lanes in several locations where none currently exist to provide continuous bicycle facilities in both directions on 1st Avenue and Central Avenue from Madison Street to Baseline Road. New bicycle lanes would be constructed at the locations noted in Section 3.6.3.3, <i>Pedestrians and Bicyclists</i>, and Table ES-1, <i>South Central Light Rail Extension At-A-</i></p>

No.	Commenter	Comment	Valley Metro Response to Comment
		<p>D. Does the environmental assessment provide how rail enhances community to reduce negative impacts of extreme heat conditions, flooding, and other inclement weather impacts and improve disaster preparedness throughout the corridor?</p>	<p><i>Glance.</i></p> <p>The Project would conform to guidance and specifications in the Urban Design Guidelines (2001), Metro Central Mesa LRT Extension Urban Design Guidelines (2010) and Valley Metro’s applicable design criteria for stations, landscape, etc. These documents include methods to enhance and maintain urban continuity. (http://www.valleymetro.org/images/uploads/lightrail_publications/Design_Criteria_Manual_FINAL_030207.pdf).</p> <p>Shade canopies would be provided at the stations consistent with Valley Metro’s Urban Design Guidelines and the Light Rail Transit Design Criteria Manual. The conceptual design includes new landscaping at designated locations adjacent to sidewalks, stations, and the light rail guideway. The landscape plans will be further refined as the Project progresses through design.</p> <p>D. The Project will not cause any inclement weather impacts such as extreme heat conditions and flooding. Extreme heat conditions, weather conditions and disaster preparedness are not impacts caused by the Project. Section 3.7.1.5 of the EA, <i>Greenhouse Gases</i>, discusses the issue of climate change and the <i>City of Phoenix’s Climate Action Plan</i> goals to reduce greenhouse gas emissions, which contribute to climate change. The Project would support national, regional and City of Phoenix efforts to reduce greenhouse gases.</p> <p>The Project and the light rail system as a whole include consideration for system resilience and safe operations of the Project during extreme heat conditions and inclement weather. Valley Metro’s standard light rail station design was developed to provide relief from direct sunlight and extreme heat conditions during the summer months. The paint and the seating at our stations are designed to reduce the amount of heat that is absorbed, making them more comfortable for our passengers. Water fountains and canopies will be provided at all light rail stations for passenger comfort. Landscaping is included as part of the Project and would provide some relief from the summer heat and enhance the community (see response to previous comment [2C] on improving foliage and shading). These elements may be refined during final design.</p> <p>Regarding flooding, as noted in Section 3.17.3 of the EA, <i>Wetlands, Navigable Waters and Floodplains</i>, the Project would cross 100-year floodplains, one at the Salt River and one at the Western Canal (see Section 3.17.1, 3.17.3, and Figures 3-24 and 3-25 for discussion of the floodplains and graphics of study area floodplains). The Project would</p>

No.	Commenter	Comment	Valley Metro Response to Comment
		<p>E. How will Rail/transit linkages enhance the success of existing businesses?</p> <p>F. How will mitigation programs prevent/manage the loss of existing businesses throughout the corridor?</p>	<p>not substantially increase the impermeable surface compared to the existing conditions, and all stormwater would be conveyed to the existing stormwater system. The Project would not result in an adverse effect on floodplains.</p> <p>E. As discussed in Section 1.2.5 in the <i>Purpose and Need</i> chapter of the EA, the Project would provide a seamless connection with the existing light rail system and would enhance access to and from the South Mountain Village core and the Ed Pastor Transit Center. Providing a connection to light rail service at this transit center would enhance the ability of transit passengers to access destinations and employment centers within the study area and throughout the region. In addition, Section 3.4.3.3 of the <i>Economic Effects</i> section of the EA states that the enhanced access and mobility that the Project would offer could boost the economic activity of existing businesses near the alignment as employees and visitors purchase goods and services.</p> <p>F. As discussed in Section 3.1 <i>Land Acquisition and Relocation</i>, construction of the Project requires the acquisition of up to two businesses (one is a potential relocation depending on the final selection of TPSS sites). The Uniform Relocation Assistance and Real Property Acquisition Policies Act and its amendments provide protection and assistance for businesses affected by the acquisition and demolition of real property during construction of federally funded projects. Private property owners would be compensated at fair market value for land acquired for Project right-of-way. Landowners required to move to a new business location may be eligible for relocation benefits. These payments may include a housing supplement, moving costs, reestablishment costs, incidental expenses and closing costs. (see Section 3.1.4 for more information on the Uniform Relocation Act).</p> <p>Similar to the Northwest Extension that opened in March 2016, Valley Metro, the City of Phoenix and additional partners (e.g., Local First Arizona, Friends of Transit) will work together to implement customized business assistance programs for light rail construction projects, including the South Central Light Rail Extension Project. The goal of these programs is to assist business owners by providing tools that can help them continue to remain healthy and well-positioned to maintain business during construction. Some of the tools used are business signage, business assessments and marketing assistance. The final business assistance program will be documented in Valley Metro's Public Involvement Plan for the South Central Light Rail Extension.</p>

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		<p>G. How does rail transit prepare the south central corridor to capture the regions exponential job and resident growth over the next 50 years.</p>	<p>G. The City of Phoenix, along with stakeholders, anticipates that the Project would have positive effects on induced commercial and residential development near proposed stations and the light rail alignment. As stated in Section 3.4.3 of the EA, <i>Economic Effects</i>, the Project is anticipated to stimulate local economic activity in the short and long term. In the short-term, new and sustained employment opportunities would be created to operate and maintain the additional length of the light rail system. In the longer term, employment would more likely come from indirect employment opportunities in retail, service (especially around stations) and municipal services sectors that would result from the anticipated growth and increased densities within the corridor.</p> <p>The enhanced access and mobility that the Project would offer to South Central Phoenix and to the region, coupled with potential investment in pedestrian-oriented development, the Walkable Urban Code and implementation of transit-oriented development policies such as Phoenix’s General Plan Reinvent Phoenix and the Complete Streets Ordinance, already adopted by the City of Phoenix, are likely to intensify land uses and generate additional jobs in the study area (see Table 3-7, <i>Summary of Local Plans</i>, and Table 3-8, <i>Consistency with Local Plans</i>, for additional information).</p> <p>Overall, the enhanced access provided by the Project, in concert with the City of Phoenix policies, which the Project supports, would contribute to the area’s desirability as a place to live and work and would support other public and private investments. Thus, construction and operation of the Project could result in indirect spin-off economic growth. Additionally, the Project would not have an adverse impact on tax revenues, but given the Project’s indirect spin-off economic growth would result in more tax income for the City. For additional information refer to Section 3.4.3.3, <i>How is the Proposed Build Alternative Expected to Affect Tax Revenues, Employment and Overall Economic Development?</i></p> <p>Finally, development along the existing light rail corridor is a good indicator of how future development could proceed in the Project corridor. Since opening in December 2008, more than \$8.2 billion of development has occurred within a half mile of the light rail corridor, with the 13-mile Phoenix portion of the line accounting for more than half of such development (\$4.6 billion). This development has added more than 10 million square feet of commercial and office space and nearly 16 million square feet of residential space in Phoenix. Implementation of the Project could facilitate the same type of sustainable, transit-oriented development in the South Central Avenue</p>

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		<p>H. Why was the South Central Neighborhood transit Health Impact Assessment (SCNTHIA) Not utilized as a blue print for the South Central light Rail Extension impact mitigation implementation strategy?</p> <p>I. How will rail linkage enhance the existing strong community bonds and further connectivity within and between the neighborhood communities? How do we avoid rail/transit linkage from dissecting or dividing the community?</p>	<p>corridor.</p> <p>H. See Master Response 1</p> <p>I. As is discussed in Chapter 1.0, <i>Purpose and Need</i>, Section 1.2.5 of the EA, the Project would enhance access and provide connectivity from the South Mountain Village core and the Ed Pastor Transit Center to regional employment centers and activity destinations such as Downtown Phoenix, the North Central Avenue employment center, Phoenix Sky Harbor International Airport and the Arizona State University Main and Downtown campuses. Additionally, the Project, in combination with the existing local bus network, will enhance access to neighborhoods, grocery stores, health care facilities, community centers and other destinations accessible within the corridor and through the regional transit system (e.g., Sky Harbor Airport and St. Luke’s Medical Center).</p> <p>The Project will implement 20 new pedestrian crossings (7 station locations and 13 new traffic signals), increasing the number of crosswalks within the 5-mile South Central corridor and providing more locations for pedestrians to safely cross Central Avenue and improve access between the neighborhoods currently separated by this roadway (see Appendix A, <i>Conceptual Design Plans</i>, in the EA for illustrations of the project design).</p> <p>As stated in Section 3.13.3 of the <i>Community Impacts</i> section of the EA, , the Project will not result in permanent barriers to the movement of people, goods and services in the area and will cause no permanent disruption of the community. The Project primarily occurs within an existing transportation right-of-way and will not introduce a new barrier or division in the community. Furthermore, access to community services and facilities will be maintained during construction. Therefore, the Project would have no adverse effect related to community cohesion. Additionally, as discussed in Section 3.14, <i>Environmental Justice</i>, the Project would not result in disproportionately high and adverse impact on low-income or minority populations because the burdens (e.g., construction activities) and benefits (e.g., improved transit access, more convenient and reliable mode, increased growth, etc.) are balanced across all demographic groups affected by the Project.</p>

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3	Jere T. Humphreys	Keep up the good work, Valley Metro, mayor Stanton, and Phoenix City Council. When we lived in Tempe my wife rode the light rail to downtown phoenix (ASU) every work day and it worked very well. I (ASU professor in Tempe rode it occasionally. Now we live at 16 th St. and Dobbins adjacent to South Mountain. This South Central extension will, undoubtedly, improve the quality of life and generate positive development of many kids throughout the South Central area. I have helped build countless houses as a volunteer leader For Habitat For Humanity. The Valley Metro is another positive Force For good.	Thank you for your comment and for supporting the Project.
4	Rob Rogers	<p>A. Will St. Catherine of Siena qualify for business assistance?</p> <p>B. The school can be negatively impacted during construction and the effect on traffic.</p>	<p>A. Valley Metro customizes its business assistance programs to best meet the unique needs of each community affected by a construction project such as the South Central Light Rail Extension. The specific details of the business assistance program for this Project, including which businesses are eligible for what type of assistance, have not yet been developed. However, on previous projects, any businesses immediately adjacent to the project were offered access to the full business assistance program. The Final Design and Construction Public Involvement Plan (PIP) will document program details of eligible businesses.</p> <p>B. As with any construction project, temporary impacts from noise, traffic, etc., are anticipated at various times throughout the construction process (see Section 3.20 of the EA). Construction of the Project would result in temporary disruptions to vehicles, pedestrian, and bicycle traffic related to temporary closures of traffic lanes, sidewalks or bicycle lanes. Additionally, to minimize the accident potential for students attending nearby schools, Valley Metro would conduct a safety education program to target elementary and junior high school students. The program would be similar to that carried out prior to the operation of the existing light rail line. That program included distribution to the schools of age-appropriate safety-related materials such as coloring books, word hunts, crossword puzzles, maze worksheets, bookmarks and build-your-own-train kits with integrated safety messages. Valley Metro maintains a website (www.valleymetro.org/safety/kids_safety_spot) that allows anyone accessing the site to download most of the materials and includes a link for school teachers or administrators to request Valley Metro staff to make a presentation to their classrooms. For additional information on pedestrian safety measures see Section 3.16.3.3 in the EA.</p> <p>Valley Metro, as part of its standard procedures for initiating new</p>

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		<p>C. Concern for horn & whistles at Southern & Lynne that will disrupt Mass at St. Catherine of Siena Catholic Church. Sunday Mass from 6:30am-5:00pm, Saturday evening Mass weekly 7:00am Mass plus funerals weddings, confession, throughout the week</p> <p>D. 1) Bridge for crosswalk for students to cross from St. Catherine of Siena School to Mass at St. Catherine of Siena Church</p> <p>2) Rubberize road from Southern to St. Anne Ave to minimize the noise in from on school. School Day is extending until 5:00pm & through the summer, Preschool being added, as well.</p>	<p>services, would work with the City and local organizations to educate transit users, auto drivers, bicyclists and pedestrians about safety and security along the planned extension. This would include advertising, social media and other outreach efforts to explain how the light rail interacts with automobile traffic, bicycle lanes and pedestrian activities. This program would begin during the initial testing phase of operations and would work hand-in-hand with other safety and security outreach efforts for the regional transit system For additional information on pedestrian safety see Section 3.16.3.3 in the EA.</p> <p>A traffic control plan will be developed with the City of Phoenix and those property and business owners most affected and will conform to local, state and federal policies to minimize traffic impacts and maintain access to residences, businesses, community facilities and services and local streets.</p> <p>C. See Master Response 10 regarding noise concerns at St. Catherine of Siena School and Church and St. John Bosco Church.</p> <p>D. The intersection of Lynne Lane/Central Ave (just north of St. Catherine of Siena Roman Catholic Church) and Alta Vista Rd/Central Ave (across from St. Catherine of Siena Catholic School) will both be signalized and have crosswalks providing for a safe and controlled crossing to and from the church and school (see Appendix A of the EA, page 17 of the conceptual design plans).</p> <p>Please see comment 1 for further information on noise and the consideration of noise mitigation in the vicinity of St. Catherine of Siena School and Church.</p>
5	Lisa Cooper	A: To: City of Phoenix Streets updates my biggest concern is the updating of 7 th Ave, 19 th Ave, 7 th Street, 16 th Streets BEFORE any construction begins on Rail System.	A. The EA identified roadway capacity upgrades at three locations as a result of traffic diversion from lane reductions on Central Avenue. These locations are at 7th Street/I-17 Freeway, 7th Avenue/I-17 Freeway, and 7th Avenue/Southern Avenue. A final construction schedule will not be complete until after final design has been completed. In consultation with the City of Phoenix Street Transportation Department, Valley Metro intends to complete these improvements prior to beginning construction activities on Central Avenue to minimize traffic impacts on parallel roadways during

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		<p>B. Also: Please improve bike trail from 7th Street to South Mountain. Please improve the crosswalk on Central Avenue/Highline Canal south of Baseline as there will be more pedestrians.</p>	<p>construction. The 16th Street and 19th Avenue corridors are located 1.5 miles east and west, respectively, of Central Avenue; too far away from the project to be affected. The traffic analysis completed in association with the EA considered parallel roadway corridors within one-half mile of Central Avenue, the distance sufficient to capture indirect impacts from the Project.</p> <p>Additionally, the EA (Table 2-3) identified street improvements with the EA study area that are in the Maricopa Association of Governments (MAG) Transportation Improvement Program (TIP) FY14–18 and are scheduled to be completed by 2018. Any improvements outside of those listed in Table 2-3 have not been studied or scheduled; however, the timing preference for roadway improvement projects on parallel and perpendicular roadways will be conveyed to the City of Phoenix.</p> <p>B. The bike lane on 7th Street is more than a half mile east of the Project alignment and is outside of the Project area. Because the Project would cause traffic to shift from Central Avenue to 7th Street and 7th Avenue, there is an increase in traffic on these roadways. However, south of Baseline the increase is minimal. Because the traffic increase is minimal it is not necessary to improve or extend the bike lanes. The Project would enhance the Central Avenue corridor by adding bicycle lanes where none currently exist to provide continuous bicycle facilities in both directions on Central Avenue. Locations of new bicycle lanes on Central Ave are as follows:</p> <ul style="list-style-type: none"> • Southbound on Central Ave between Riverside St and Broadway Rd • Southbound and northbound (both directions) on Central Ave between Southern Ave and Baseline Rd <p>For more information on bicycle lanes see Section 3.6.3.3 of the EA.</p> <p>The existing crosswalk on Highline Canal and Central Avenue would not likely see a substantial increase in pedestrian activity from the Project because it is approximately 0.35 mile south of the end of line station. Additionally, the vehicle traffic is expected to be reduced on Central Avenue south of Baseline with implementation of the Project. Since there would not be an increase in vehicle or pedestrian traffic there is no need to improve the existing crosswalk. Since there is no adverse effect, an additional crosswalk was not included in the EA. Additionally, the end-of-line station can be accessed from the east or west side of Central Avenue, so the Project would not necessitate pedestrians and bicyclists crossing Central Avenue. The Project will, however, maintain or upgrade pedestrian facilities such as ramps, sidewalks, crosswalks and other Americans with Disabilities Act-</p>

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			<p>compliant provisions specifically associated with the Project. Additionally, pedestrian signals will be added at all proposed signalized intersections near light rail stations. For more information on pedestrian facilities, see Section 3.6.3.3 of the EA.</p>
6	Jim Stity	<p>I have been a strong supporter of lightrail. But this plan is just bad. Central <u>Needs</u> to stay two lanes. Had I know this plan I would have voted no. That being said, somewhere the city needs to stop treating south Phoenix as a step child. Pony up and do this right. I want to be happy for the community I have lived in for 55 years, but I am not happy with this. You do not treat north Phoenix this way.</p>	<p>Thank you for supporting light rail transit; your concern regarding the reduction in automobile traffic lanes is acknowledged. During the early planning phase of the South Central Light Rail Extension, the option of preserving both lanes of traffic was analyzed. To maintain the current number of general traffic lanes on Central Avenue, many businesses along the corridor would need to be relocated. Nearly 80 buildings, some of which house more than one business, will require relocation as opposed to the 2 buildings being relocated under the current Project. Furthermore, the acquisitions will have resulted in remnant parcels, which can be difficult to redevelop and potentially blight the community if left undeveloped (Additional information on the development of alternatives may be found in Section 2.1 of the EA).</p> <p>The City of Phoenix and Valley Metro held meetings with members of the public and area stakeholders to review the roadway lane configuration options. In addition, a Community Working Group that included residents and businesses from the area was formed to provide further input on the roadway lane configuration options and other design elements associated with the Project. Through these meetings, it was determined that reducing the lanes from two lanes in each direction to one lane in each direction will be preferable to avoid business and residential displacement that would result from having to acquire the first row of buildings located on one side of Central Avenue. The South Mountain Village Planning Committee and the Phoenix City Council approved the Project definition including the roadway configuration.</p> <p>As part of the EA study, the traffic was analyzed along Central Avenue and 1st Avenue and along the parallel roadways of 7th Street and 7th Avenue to identify whether the change in the roadway configuration on Central Avenue from two lanes in each direction to one lane would constitute an adverse impact on traffic. These intersections were reviewed using City of Phoenix criteria for traffic mitigation. The City of Phoenix Street Transportation Department has established the following criteria for the proposed Project to determine what constitutes an impact at an intersection. The criteria are based on a comparison of level of service (LOS) (i.e., traffic congestion). It is often expressed in qualitative terms as LOS A (free flow of traffic) to LOS F (congested) and delay between the Build and No-Projects, as</p>

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			<p>follows:</p> <ul style="list-style-type: none"> • For LOS A to D, if the Project maintains the same or improved LOS compared with the No-Project, it is not an adverse impact. However, if the Project LOS degrades below that of the No-Project and the delay increases greater than 5 percent, an adverse impact would occur and would require mitigation. • For LOS E, the delay for the Project must be greater than 5 percent compared with the No-Project to be an adverse impact. Mitigation would be required for the adverse impact. • LOS F would be an adverse impact and would require mitigation. <p>Applying the City of Phoenix Street Transportation Department's criteria, the analysis concluded that there would be no adverse impacts (degradation of LOS) on Central Avenue resulting from the Project. For more information on intersection performance (LOS) along Central Avenue with and without the Project's lane reductions, see Table 3-12, <i>Intersection Level of Service and Delay (PM Peak)</i> in the EA.</p> <p>Table 3-16 of the EA, <i>Study Intersections – Mitigation</i>, summarizes the locations where improvements were required in accordance with City of Phoenix criteria and proposed mitigation. The overall goal is to develop South Phoenix by converting Central Avenue into a multimodal facility and making necessary roadway improvements where needed along 1st Avenue and Central Avenue and adjacent parallel arterials to maintain the safe and efficient traffic operations.</p> <p>The planning and design of the Project are consistent with the current light rail system. For the current light rail system, lane reductions have occurred at several locations outside of South Phoenix: on Central Avenue from approximately Jefferson Street to Camelback Road, on Washington Street between Priest Road and 1st Avenue, and on Main Street in Mesa from Country Club Drive to Mesa Drive.</p>
7	Linda Johnson	I am so happy the rail is coming to south Phoenix, am a home owner	Thank you for your comment and for your support of the Project.
8	Barbara Hunt	What kind of plans does the City have for making Central Ave & Baseline Rd a destination not a deadend. I am concerned about the detriment to existing residential security. Police helicopter are pretty routine at this intersection.	<p>The Phoenix City Council recently passed a Place-Type designation for all station areas located along the South Central Light Extension, including the station area located at Central Avenue and Baseline Road. This designation will provide developers and property owners the opportunity to vary the type and intensity of development in the area, enabling opportunities for creating an activity center adjacent to and near the Baseline Road light rail station.</p> <p>Valley Metro safety and security personnel work closely with the City</p>

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			<p>of Phoenix Transit Police to minimize the risk of criminal activity at transit stops and facilities. Rail stations are lighted during all nighttime hours and include multiple closed-circuit cameras monitored 24 hours per day by trained safety and security personnel. Emergency contact beacons are provided at every rail station, providing a direct link between the rail station and local police departments. Police patrols are routinely made along all portions of the rail alignment, along with regular in-vehicle patrols by authorized security personnel capable of contacting emergency responders directly. Train vehicles are equipped with several passenger safety features including call buttons to communicate with the driver directly and in-vehicle cameras (see Section 3.16.3.1 of the EA for additional information on safety and security measures).</p>
9	Steve Procaccini	<p>I support the plan for either Light Rail or a Modern Streetcar along Central Ave from downtown to Baseline or perhaps just before the S. Mountain Park entrance. I don't want to see any buildings over 50 years old torn down. I'm concerned about the building @ Central at Tonto. I hope there is enhanced landscaping and trees. The bridge over the Salt River needs to be rebuilt/re-designed so that it is an artistic, landmark structure.</p>	<p>Thank you for your support of light rail or modern streetcar. As discussed in Section 2.1 of the EA, alternatives were developed for the Project and through a screening process a locally preferred alternative, light rail, was selected.</p> <p>As discussed in Section 3.10.1.4, no buildings over 50 years old that are eligible for listing on the National Register of Historic Places will be adversely affected by the Project. No historic building that is listed or eligible for listing on the NRHP is planned to be demolished as part of this Project. There are some cases, such as at Central and Tonto, where a small amount of land (generally associated with landscaping, yards or parking) will be needed for the Project; however, this land does not contribute to the properties' eligibility for listing on the NRHP and will not adversely affect the historic settings or architectural features of the historic properties (see Sections 3.10.3.2 and 3.11.3.2 for additional information on historic resources).</p> <p>Landscaping will be provided along the entire corridor based on City of Phoenix requirements.</p> <p>The bridge over the Salt River will be structurally retrofitted to accommodate light rail. Artistic components, if any, associated with the bridge will be determined during final design and in coordination with Valley Metro's Public Art Program.</p>
10	Gila River Indian Community	<p>The Gila River Indian Community's Tribal Historic Preservation Office (GRIC-THPO) indicated it received a Section 106 consultation package on May 10, 2016 and that they'd initially responded to the undertaking on September 14, 2015. The GRIC-THPO concurred with the recommendation for the preparation of Historic Property Treatment Plan and would like to review and comment on</p>	<p>On May 10, 2016, the Gila River Indian Community (Community) and other tribal entities received a copy of the EA including the appendices that contained the Cultural Resources Inventory and Evaluation for the Project. On June 16, 2016, the Draft Memorandum of Agreement (MOA) was sent to the Community and other tribes for review and comment. It is anticipated that the MOA will be distributed to all involved parties for final signature in July 2016. FTA and Valley</p>

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		the document. The proposed project area is within the ancestral lands of the Four Southern Tribes and the GRIC will continue to participate in the Section 106 process (see attached letter).	Metro will continue to coordinate and consult with the tribal governments as outlined in Section 106 and will provide the Historic Property Treatment Plan for review and comment.
11	San Carlos Apache Tribe	The San Carlos Apache Tribe indicated that they concurred with the Cultural Resources Report findings and that they would defer to tribes located closest to the project area regarding findings of effect for the proposed undertaking (see attached letter)	Thank you for your comment. We are continuing consultation with the following tribal entities: Ak-Chin Indian Community, Fort McDowell Yavapai Nation, Gila River Indian Community, Hopi Tribe, Pascua Yaqui Tribe, Salt River Pima-Maricopa Indian Community, San Carlos Apache Tribe, Tohono O’odham Nation, Tonto Apache Tribe, White Mountain Apache Tribe, Yavapai-Apache Nation, and Yavapai-Prescott Indian Tribe. Continuing consultation and coordination is ongoing as described above in Comment 10.
12	Audubon of Arizona	<p>A. Concerned about location of the traffic circle south of the Salt River and north of the Audubon station stops. The concept location for the traffic circle is on top of an existing smaller bridge that allows for east-west pedestrian and bicycle access under Central Avenue on a paved path this is an important recreation access feature of the Rio Salado Habitat Restoration Area.</p> <p>B. The Concept Drawing incorrectly indicated “Future Connection to Development” with crossing gates on the alignment of the existing below grade pedestrian and bicycle path. We didn’t see any discussion in the draft EA about rebuilding or enlarging the bridge to accommodate the traffic circle.</p>	<p>A. The access on Central Avenue at the Salt River Bridge where the roundabout (traffic circle) would be constructed will no longer be available to pedestrians and vehicles (see sheet 10 of the Conceptual Design Plans in Appendix A of the EA). Historically, the underpass accommodated the movement of heavy vehicles associated with the previously operated sand and gravel businesses on the west side of Central Avenue; it was not initially intended for pedestrian use. A letter from the City of Phoenix Parks and Recreation Department (July 12, 2016) indicates that the primary purpose of this underpass and “access trail” is for transportation, that is, for use by City maintenance vehicles. This dirt area is not marked as a trail nor maintained as one. The Audubon may use this area as an ad hoc trail, but its official designation is transportation not recreation. The City of Phoenix Parks and Recreation Department has approved of the closure. It should be noted that construction of the roundabout would be entirely within the City of Phoenix’s transportation right-of-way. Access to the Rio Salado Habitat Restoration Area will be maintained. Pedestrians and authorized vehicles can use the existing crossing under the Central Avenue bridge, which is located adjacent to the bridge abutment on the south side of the Salt River. Pedestrians will be able to safely cross Central Avenue by using the new Central Avenue crosswalks that will be provided at the Audubon Light Rail Station, the roundabout in front of the Audubon Center and the roundabouts on Central at Victory Street.</p> <p>B. The “Future Connection to Development” label on the concept drawings was intended to suggest that the design would not preclude a future connection to a future development at this location by others. There is currently no connection provided, but the design of the roundabout could accommodate future connections if desired by adjacent property owners and the City of Phoenix.</p>

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		<p>C. We are very concerned about the circle being at this location as it will increase the footprint of vehicular traffic immediately adjacent to the Rio Salado Habitat Restoration Area and requires significant redesign of the road and walkways at this location. We are also concerned about the safety of a traffic control feature over a pedestrian underpass that is used extensively for school field trips that originate at the Nina Mason Pulliam Rio Salado Audubon Center.</p> <p>D. Audubon Arizona recommends moving the Audubon station stop north, with the pedestrian signal in the same location, but on the south end of the station stop rather than the north end. The north traffic circle could then be located north of the Salt River and the south traffic circle at Pioneer Street.</p> <p>E. Audubon Arizona access is on an unnamed dead end street. We will need access to Pioneer Street during the construction phase if our section of Central Avenue is closed.</p> <p>F. The biological assessment accurately evaluates the potentially affected sensitive species and habitats, primarily within the Rio Salado Habitat Restoration Area. We do recommend that mitigation of disturbed or destroyed native habitats and vegetation be included in the project scope.</p>	<p>C. Vehicular traffic on Central Avenue is anticipated to be less than in the No-Project. Traffic models have shown that because traffic lanes will be reduced from two lanes in each direction to one lane in each direction on Central Avenue, some of the traffic volumes on Central Avenue will shift to adjacent parallel streets (7th Avenue and 7th Street) resulting in a reduction of traffic on Central Avenue (see Section 3.6.3.1, <i>Traffic</i>) and Table 3-12, <i>Intersection Level of Service and Delay (PM Peak)</i>). Also see response A for more information on safe crossing options for pedestrians.</p> <p>D. The roundabouts were located in their present locations to efficiently accommodate freight vehicles requiring northbound and southbound access to and from the industrial area east of Central Avenue along Victory Street and Pioneer Street. The roundabouts work in tandem to allow vehicles exiting the industrial area to travel northbound or southbound. The recommended roundabout location north of the river would require considerable out-of-direction travel for freight vehicles trying to go south on Central Avenue from either Victory or Pioneer Streets. Additionally, moving these roundabouts closer together would prevent adequate spacing between the roundabouts and the station entries, which would not be desirable from a vehicle movement and pedestrian safety perspective. Overall, the Audubon's recommendation would not provide the necessary bidirectional access to Victory and Pioneer Streets. For more information on roundabout see Section 3.6.3.4, <i>Truck Routes</i>, in the EA.</p> <p>E. A traffic control plan would be developed with the City of Phoenix and those property and business owners most affected and would conform to local, state and federal policies to minimize traffic impacts and maintain access to residences, businesses, community facilities and services and local streets (see Section 3.20.3.2, <i>Construction Impacts</i>, in the EA). Valley Metro would coordinate with Audubon Arizona to ensure access is maintained to its facility during construction. One lane of traffic in each direction would be maintained on Central Avenue during construction, although temporary delays should be expected.</p> <p>F. The recommended mitigation is included in Section 3.19.4, the mitigation section of <i>Ecologically Sensitive Areas/Threatened and Endangered Species Section</i>, of the EA. The section states that Valley Metro, in coordination with the City of Phoenix, would develop a vegetation planting and habitat improvement plan incorporating plant species used for the RSHRA to replace vegetation removed within the Salt River channel.</p>

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		<p>G. Please note that the scientific and common names for the Yuma clapper rail (<i>Railus longirostris ymanensis</i>) have changed to Yuma Ridgeways' rail (<i>Railus obsoletus yumanensis</i>)</p> <p>H. We recommend including a discussion of Arizona Game and Fish Department Species of Greatest Conservation Need that occur within the Rio Salado Habitat Restoration Area with some regularity. Birds of Greatest Conservation Need that Audubon knows occur more than occasionally in the Rio Salado Habitation Restoration areas are included in the letter (see attached letter).</p>	<p>G. We understand that there has been a change in the name of the Yuma clapper rail; however, the U.S. Fish and Wildlife Service (USFWS) has not updated its species lists to include the new name. To avoid confusion, the EA and Biological Assessment (BA) are consistent with USFWS naming. In addition on April 14, 2016, USFWS reviewed the BA and concurred with the determination of effects and did not request incorporation of the new name.</p> <p>H. During the preparation of the technical studies, Valley Metro accessed the Arizona Game and Fish Environmental Review Tool to request a list of species that are known to occur or have the potential to occur within the project study area. In addition, Valley Metro requested an IPaC Trust Resource Report from USFWS that provides a list of proposed, candidate, threatened and endangered species that have the potential to occur within or adjacent to the study area. The IPaC list also provides a list of species of bird species that are birds of conservation concern and fall under the Migratory Bird Treaty Act. The lists that Valley Metro received included the bird species that were identified in your letter. Valley Metro reviewed both lists and those bird species identified in your letter are not federally listed as threatened or endangered under the Endangered Species Act. Therefore, they were not included in the Biological Assessment and informal Section 7 consultation with the U.S. Fish and Wildlife Service. However, they are protected under the Migratory Bird Treaty Act. Section 3.19.4 of the EA, <i>Ecologically Sensitive Areas/Threatened and Endangered Species</i>, discusses impacts and mitigation measures for migratory birds.</p>
13	ATC Group Services/ Arizona Healthfields	<p>A. This (South Central project) improved transit corridor will be a major step forward for creating healthy communities for all South Central Phoenix residents.. Valley Metro is to be applauded for citing SCNTHIA in section 1.4 of the Environmental Assessment (EA), and for considering improving accessibility to employment, health care, social services, healthy food and recreation and other amenities for transit dependent populations as a goal for the proposed Project. However, it is discouraging to see the lack of continuity of this goal throughout the EA.</p> <p>This letter presents more detail about SCNTHIA and makes a number of recommendations on how the results from SCNTHIA can be used to strengthen the EA as well as the actual transit corridor extension.</p>	<p>A. Valley Metro and the City of Phoenix acknowledge the importance of the SCNTHIA to the South Phoenix community. See Master Response #1 for an explanation as to why SCNTHIA is not found throughout the EA.</p> <p>The Final Recommendations on pages 136-149 of the South Central Neighborhoods Transit Health Impact Assessment are primarily policy-related statements that Valley Metro considered in its design and development of the proposed South Central Light Rail Transit Project as discussed in the Master Responses.</p>

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		<p>B. Two direct/immediate outcomes of the south central extension have been identified: 1) Economic development and 2) Increased access to transit. These direct outcomes further impact the community and their health through six primary categories:</p> <ul style="list-style-type: none"> • Landscaping/shade structures, which impact heat related morbidity and mortality • Household transportation costs • Employment/entrepreneurship • Housing, which impacts stress and social cohesion • Access to health services, healthy foods, and recreation, • Active transportation, automobile usage and transit ridership, including bicycling and walking that impact levels of injury and physical activity. <p>C. SCNTHIA RECOMMENDATIONS</p> <p>As a result of extensive research and community engagement, the SCNTHIA proposed 41 recommendations within the six categories listed above. The following is a sample recommendation for each category:</p> <p>C1. Landscape/Shade/Safety (page 136): Install extensive, improved lighting features (such as LED and solar lighting) at, and around all bus stops and proposed light rail station to enhance levels of safety, visibility, and perception of comfort.</p> <p>C2. Household Transportation Costs (page 140): Offer discounted unlimited ridership passes in longer duration (3-month, 6-month, 1-year)</p> <p>C3. Business and Employment (page 141): Provide guidance and assistance for existing business retention and new business development along light rail extension.</p> <p>C4. Housing (page 143): Engage rental property owners, especially those providing housing to low-income tenants, to promote the Valley Metro Reduced Fare Program.</p> <p>C5. Access to services and Resources (page 144): Valley Metro should re-establish its Disability Advisory</p>	<p>B. The two outcomes by the commenter are part of Chapter 1.0, <i>Purpose and Need</i>, of the EA.</p> <p>The six primary categories and sub-elements and their relationship to the EA are discussed in the Master Responses 2.2 through 2.7.</p> <p>C1: See Master Response #2</p> <p>C2. See Master Response #3</p> <p>C3. See Master Response #4</p> <p>C4. See Master Response #5</p> <p>C5. See Master Response #6</p>

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		<p>Council to develop recommendations to address the special needs for persons with disabilities.</p> <p>C6. Active Transportation (page 148): Incorporate enhanced maps and signage for pedestrians and bicyclists at existing and new light rail stops to direct transit riders to local destinations (i.e., hospitals, landmarks, streets). Include nearby landmarks or amenities, at LRT stations.</p> <p>D. SCNTHIA document (pages 136-149), be entered in the record for the EA as public comments.</p> <ul style="list-style-type: none"> • The extension of the rail to Baseline Road is recommended. This could bring multiple public health improvements to the area as well as economic and social changes, living and working conditions, and public services and infrastructure all of which will lead to individual behavior improvements. • On page ES-9 ES. 3 the following addition is recommended: “Improve and promote health, safety, and comfort along the proposed corridor for all residents, business owners, and light rail users.” 	<p>C6. See Master Response #7</p> <p>D. The SCNTHIA document has been entered into the record for the EA. See Master Responses #1 through #9.</p> <p>The Project does extend to Baseline Road. Please see Figure 1-2, <i>South Central Light Rail Extension Study Area</i>, which shows the Project limits and Section 2.2.2, <i>Build Alternative</i>, which describes the Project.</p> <p>See Master Response #9</p>
14	Maricopa County Department of Public Health (MCDPH)	<p>A. We are encouraged to see Valley Metro’s progress in working with the community to extend Light Rail into South Central Phoenix that will be a major step forward for creating healthy communities for all South Central Phoenix residents.</p> <p>B. The purpose of an Environmental Assessment (EA) is, in part, to understand the direct, indirect and cumulative impacts of a project on the human environment. An HIA is fully consistent with the required elements of an EA and addresses impacts of a project on the social, cultural, environmental and community factors, in addition to individual lifestyle and behavior.</p> <p>C By using a community-directed and evidence-based approach to understanding the public health impacts of a proposed federal project, an HIA helps satisfy the requirements of public participation within an EA.</p>	<p>A. Valley Metro and the City of Phoenix acknowledge the importance of the SCNTHIA study and its recommendations in the Project planning. As the commenter notes, SCNTHIA is discussed in Section 1.4 of the EA, <i>What are the Goals for the Proposed Build Alternative?</i>, as it relates to Project planning and the development of the Project goals.</p> <p>B. See Master Response #1.</p> <p>C. As Chapter 4.0 of the EA, <i>Who Are the Agencies and Persons Consulted?</i> demonstrates, there were extensive opportunities for the public to participate in the EA and the Project. Valley Metro and MCDPH met several times over the course of the Project. MCDPH</p>

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		<p>D. We applaud Valley Metro for citing SCNTHIA in section 1.4 of the Environmental Assessment (EA), and for considering improving accessibility to employment, health care, social services, healthy food, recreation, and other amenities for transit dependent populations within the proposed Project. However, we were discouraged to see the lack of continuity of this goal throughout the EA. Therefore, we have presented more detail about SCNTHIA and have requested a number of recommendations on how the results from SCNTHIA can be used to strengthen the EA as well as the actual transit corridor extension.</p> <p>E. SCNTHIA Recommendations: As a result of extensive research and community engagement SCNTHIA proposed a total of 41 recommendations within the six pathway categories listed above. Of the 41 recommendations, only 15 are within the authority of Valley Metro. We understand that Valley Metro does not control the multiple additional agencies identified as having some ownership of the other recommendations (although some of those partner agencies are in jurisdictions represented on the Valley Metro Board). We have included the recommendations that are applicable to the EA. Highlighted recommendations are those under the scope of this EA and apply to Valley Metro as the preparer. Clearly, some recommendations would be better considered within the maintenance and operations sections of Valley Metro, as well as the policy decision-making bodies.</p> <p>F. SCNTHIA Elements Not Addressed in EA 3.2 Work with community organizations and schools to produce and display public art during construction to enhance pedestrian and business activity. 3.4 Provide community-gathering events during light rail construction (e.g., Ciclovía/ open street/ play street).</p> <p>G. 2.3 Continue to market the Valley Metro Employer Pass Program (Platinum Card and Internal Transit Option) to</p>	<p>also presented at the Community Working Group Meetings set up for the Project and the EA. Additionally, MCDPH attended some of the Project's public meetings and set up a table with HIA information at one public meeting.</p> <p>D. See Master Response #1</p> <p>E. Master Responses #1 through #9 discuss the SCNTHIA recommendations, where they are addressed in Project planning and how they are or are not appropriate to the EA. (Also, ATC Group Services/Arizona Healthfields', Victor Vidales, and the Raza Group commented on the SCNTHIA report. Responses to their comments are contained within this matrix and in the Master Responses.)</p> <p>F. For a discussion of Pathway 3 and Elements 3.2 and 3.4, see Master Response #4.</p> <p>G. For a discussion of Pathway 2 and Elements 2.3, 2.4, 2.5, and 2.6, see Master Response #3.</p>

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		<p>employers within study area.</p> <p>2.4 Expand the promotion and education of the Valley Metro Reduced Fare Program and provide Reduced Fare ID card application assistance for those with disabilities.</p> <p>2.5 Expand categorical eligibility of Valley Metro Reduced Fare Program to include:</p> <ul style="list-style-type: none"> • Parents/ caregiver of adults/ youth/ children with special health care needs; • Persons enrolled in AHCCCS, women enrolled in the Women, Infants & Children (WIC) program, and persons enrolled in the Supplemental Nutrition Assistance Program (SNAP); and • Pregnant women. <p>2.6 Offer discounted unlimited ridership passes in longer durations (3-months, 6-months and/or 1-year).</p> <p>H. 1.5 Explore partnerships with local businesses to fund expanded construction of cooling centers at light rail stations that utilize solar powered fans and misters, and improve and maintain water fountains along existing and future stations.</p> <p>1.7 Utilize alternative building materials and structures for light rail stations and bus stops that help to mitigate heat retention.</p> <p>I. 4.6 Engage rental property owners, especially those providing housing to low-income tenants, to promote the Valley Metro Reduced Fare Rate Program.</p> <p>J. 5.2 Valley Metro should re-establish its Disability Advisory Council to develop recommendations to address the special needs for persons with disabilities.</p> <p>5.3 Conduct a feasibility study and initiate a pilot project for Neighborhood Circulator route in the South Central/South Mountain corridor between grocery stores, light rail stations, and residential areas.</p> <p>5.9 Strengthen community engagement plans and protocols to engage neighborhood residents in the review of bus level</p>	<p>H. For a discussion of Pathway 1 and Elements 1.5 and 1.7, see Master Response #2</p> <p>I. For a discussion of Pathway 4 and Element 4.6, see Master Response #5</p> <p>J. For a discussion of Pathway 5 and Element 5.2, 5.3, and 5.9, see Master Response #6</p>

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		<p>of service modifications in the study area.</p> <p>K. 6.2 Provide enhanced education to case managers of local organizations on how to navigate the light rail and transit system.</p> <p>6.3 Incorporate enhanced maps and signage for pedestrians and bicyclists at existing and new light rail stops to direct transit riders to local destinations (i.e., hospitals, landmarks, streets). Include nearby landmarks or amenities in the audio announcements at LRT stations.</p> <p>6.6 Investigate additional storage in new light rail car design, especially for cold storage. Retrofit existing light rail cars or investigate alternative methods to assist riders, especially parents, caregivers, and individuals with special needs, in transporting groceries.</p> <p>L. 1.2 Install extensive, solar powered LED lighting features along pedestrian and bicycle routes throughout the study area.</p> <p>Recommendations for the EA: M.(1) Add a Goal 5 to the Purpose of the Proposed Project (section 1.4) “Improve public health for all light rail users in South Central Phoenix.”</p> <ul style="list-style-type: none"> • “Provide economic development opportunities for residential, commercial, industrial, entertainment and leisure, and educational existing and potential beneficiaries.” • “Increasing active transportation conditions promises to support healthy lifestyles and be protective against chronic diseases.” <p>N. (2) The EA should include greater consideration of the Project’s impacts on pregnant women, families with children with special health care needs, and adults with chronic conditions that reside in the adjacent neighborhoods. The SCNTHIA’s Community Advisory Board identified data-driven health impacts among the six pathways (see above) for these populations. These communities might be the most fragile to the substantial impacts related to this South Central Light Rail Extension. Fortunately, there are mitigation strategies, many that are</p>	<p>K. For a discussion of Pathway 6 and Element 6.2, 6.3, and 6.6, see Master Response #7</p> <p>L. For a discussion of Pathway 1 and Element 1.2, see Master Response #2.</p> <p>M. See Master Response #9</p> <p>N. The EA addressed impacts to the environment caused by the Project including how the Project might impact air quality within the corridor. More specifically, Section 3.7.1.1 under <i>Air Quality</i> of the EA discusses sensitive receptors, which are locations where the elderly, children or other groups with a greater susceptibility (than the general public) to adverse health effects congregate. These locations include schools, hospitals, convalescent homes, parks and daycare facilities. Additionally, Section 3.16.3.3 of the EA discusses programs to minimize the accident potential for students attending nearby schools. Specifically, Valley Metro would conduct a safety education program</p>

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		<p>already included in the operations of Valley Metro.</p> <p>O. (3) That the full SCNTHIA document (attached and also available at the AALC website www.LivableAZ.org) and this letter to be entered as public comments to the EA. Including SCNTHIA findings into the EA would greatly expand community engagement and data collection for the entire EA. Valley Metro was a participant in the SCNTHIA process.</p> <p>P. Two overarching principles of environmental justice for this EA are to mitigate any disproportionate health or environmental effects on minority and low income populations (which the EA agrees the study area entirely includes minority and low income populations), and to ensure the full and fair participation by all potentially affected communities in the transportation decision-making process. SCNTHIA findings would help fulfill the intended scope of this EA within these two principles of environmental justice.</p>	<p>to target elementary and junior high school students. The program would be similar to that carried out prior to operation of the existing light rail in operation. That program included distribution to the schools of age-appropriate safety-related materials such as coloring books, word hunts, crossword puzzles, maze worksheets, bookmarks and build-your-own-train kits with integrated safety messages. In addition, Valley Metro maintains a website that allows anyone accessing the site to download most of the materials and includes a link for school teachers or administrators to request Valley Metro staff to make a presentation to their classrooms.</p> <p>During construction, access would be maintained to all community facilities, including health-related facilities. As noted by the commenter, many of the mitigation strategies are included in the Project. Also, see responses to ATC Group Services/Arizona Healthfields, Victor Vidales, and the Raza Group comments on the SCNTHIA report. Responses to their comments are contained within this matrix and in the Master Responses.</p> <p>O. The SCNTHIA document has been entered into the record for the EA. See Master Responses #1 through #9. Also refer to Master Comment #1 regarding the scope of the EA and the purpose of the SCNTHIA.</p> <p>P. The <i>Environmental Justice</i> section of the EA, Section 3.14, states that the Project would not result in disproportionately high and adverse environmental impacts on environmental justice populations. Valley Metro conducted an extensive public engagement process as described in <i>Public Engagement</i> Section 3.14.4 of the <i>Environmental Justice</i> section of the EA, and materials related to public engagement (e.g., meeting notices, door hangers, Project information boards) were provided in English and Spanish. Throughout the alternatives analysis and environmental analysis, Valley Metro conducted numerous public outreach efforts, including hosting general public meetings; coordinating staff and agency meetings; presenting at Board, Committee and City Council meetings; attending stakeholder meetings and coordinating the CWG. All of the meetings provided opportunities for minority and low-income populations to take part in the decision-making process. For more information on specific meetings and topics, see Chapter 4.0 of the EA, <i>Who Are The Agencies and Persons Consulted?</i></p>

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		<p>Q. (4) Once all public comments have been considered for the EA, a new 30-day public review period to permit review of modifications made should be established. Although there are many EA agencies and persons consulted (EA Section 4) along with consultants and preparers identified (EA Appendix M: List of Preparers) , neither Valley Metro nor the EA consultants conducted outreach to AALC and MCDPH as major planning partners regarding the 30-day review period. Undoubtedly, the EA process satisfied the "letter of the law", but failed to satisfy the "intent of the law" by not conducting outreach to AALC and MCDPH as well as other stakeholders regarding the review of the EA.</p> <p>R. Please see the attached <i>South Central Neighborhoods Transit Health Impact Assessment</i>, also available at www.LivableAZ.org, for additional analysis and recommendations. Finally, please include both the AALC and the MCDPH in your distribution list of affected and interested agencies for the South Central Light Rail Extension. We request a written response to our comments.</p>	<p>Q. All public comments have been considered and responses to all comments are included in this document, which is an attachment to the FONSI. Any of the changes suggested by the commenters have not changed the analysis or conclusions of the EA. Therefore, the EA was not revised and an additional public review period is not needed or required.</p> <p>Valley Metro and MCDPH met on several occasions over the course of the Project and the SCNTHIA study to discuss the outline of the SCNTHIA study as well as the recommendations included in the report. MCDPH attended several of the South Central Community Working Group meetings and provided a presentation on the HIA. Additionally, Valley Metro staff also attended SCNTHIA Insight meetings. The SYNTHIA meetings were not advertised to the public; rather they were attended by community members invited to form a Stakeholder Advisory Group to participate in the HIA study.</p> <p>Notice of the EA public meeting was provided by Valley Metro by sending out a news release and media advisory in both Spanish and English, placing newspaper ads in local newspapers including the Arizona Republic and La Voz (Spanish language), distributing 13,000 bilingual door hangers throughout the corridor and broadcasting on local news programs.</p> <p>R. AALC and MCDPH will be added to the Valley Metro’s South Central Public Information list as interested parties. A copy of the FONSI, including the responses to comments on the EA, will be sent to MCDPH and AALC.</p>
15	Raza Development Fund	<p>Specific comments on the Draft EA are as follows:</p> <p>A. Visual & Aesthetics Technical Memorandum</p> <ul style="list-style-type: none"> • Visual Assessment units 3, 4, 5, and 6 required more specific visual representation of important historical, cultural, and community character areas. • Provide more pictures, visual representation and description of Visual Assessment Unit 3 and Visual Assessment Unit 4 to accurately reflect the character of the areas. Specifically, provide visual representation and photos of St. Catherine of Siena ((6200 S Central Avenue and 6401 & 6413 S Central Avenue) 	<p>A. As described in Section 3.12.1.2 of the EA (<i>Visual and Aesthetics Methodology</i>), the visual assessment units (see Figure 3-16, <i>Visual Assessment Units</i>) for transportation projects are determined based primarily on viewsheds and landscape type, the latter of which corresponds most often to land use type in an urban condition such as South Central. This approach is similar to the assessment method used by the U.S. Forest Service, Bureau of Land Management and Federal Highway Administration. The overall corridor, with the exception of the river crossing, has a visually urban character of non-residential uses. However, because there are subtle differences in visual character from north to south the corridor was divided into assessment units</p>

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		<ul style="list-style-type: none"> • Recommend splitting up Visual Assessment Unit 4 into 5, 6 & 7 since all areas are very different in culture, demographics, history and character. • Recommend designating Unit 4 from South of Elwood St to Broadway Rd • Recommend designating Unit 4 from South of Elwood St to Broadway Rd • Recommend designating Unit 5 South of Broadway Rd to Southern Ave • Recommend designating Unit 6 South of Southern Avenue to Vineyard • Recommend designating Unit 7 South of Vineyard to Baseline Rd. <p>B. Environmental Justice Technical Memorandum</p> <p>The 2015 San Juan Diego Study (SJDS), a locally sponsored South Mountain community wide public involvement and data gathering project conducted in partnership with Arizona Community Foundation, Raza Development Fund, Promise Arizona, Espiritu CDC, St. Catherine of Siena and Arizona State University is an important data supplement to the 2009-2013 American Community Survey (ACS) 5-year estimates. Utilizing the SJDS as a supplement to the 2009-2013 ACS in the South Central Light Rail Extension Draft Environmental Assessment will provide a more accurate assessment of the minority and low-income populations in the Project study area. The assumptions made in Section 3.14 Environmental</p>	<p>based on the relative homogeneity of visual character within each area.</p> <p>The differences are predominantly in the size of building and their relationship to the street— Unit 1 represents a downtown character with high-rise buildings set close to the street and little open space. Units 2 and 3 represent an urban commercial and retail character with predominantly 1- to 2-story buildings and surface parking areas. See Table 3-31 for a comparison of characteristics by visual unit.</p> <p>As a landscape type, the assessment units south of downtown are consistently urban with an equally distributed mix of building uses (commercial, retail, schools, churches). In addition, the building forms, scales, massings, materials and architectural styles are also fairly consistent—one to two stories, rectangular shapes, shades of brown stucco. Interspersed among these simple building types are structures of brick or stone with more architectural delineation that contribute to community character. Examples are the Ed Pastor Transit Center building, St. Catherine of Siena Catholic Church, St. Catherine of Siena Catholic School and the Southern Baptist Temple. With regard to views, because South Central does not deviate off a north-south alignment, views to and from the corridor are consistent throughout.</p> <p>Unit 4, from Elwood Street to Baseline Road, is a homogeneous unit, defined by a mix of similarly scaled buildings, parking lots, vacant lots, building setbacks and architectural character. To subdivide the unit into five smaller segments would result in more subunits with almost identical descriptions, and the subdivision would not change the results of the analysis, as presented in the EA.</p> <p>B. After a review of SJDS, while the information from SJDS includes additional information regarding the demographics and socioeconomic profile of the Project study area, the information from the SJDS would not change the results of the analysis. The description of the minority and low-income populations in the EA is consistent with the SJDS findings.</p> <p>In Section 3.14.1.3 of the EA it states that the Project study area features a high concentration of both minority and low-income populations. Similarly, the SJDS found that there are high concentrations of low income in this area. In general, while some areas may have higher concentrations than others, minority and low-income populations are found throughout the study area (Figures 3-18 and 3-19). Minorities are present in every census tract (CT) along Central Avenue within the study area in amounts exceeding 50 percent of the census tract. The minority population ranges from a low of 53 percent</p>

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		<p>Justice are not consistent with our understanding of the area and the SJDS findings. SJDS provides more specific information regarding the concentration and socioeconomic demographics of the low-income residents within each Census tract and the sub areas included in the identified CTs, specifically CT-1154, CT-1158.01, and CT-1158.02.</p> <p>EA states low-income and minority populations “not concentrated in specific areas” - SJDS found differently – from I-17 – Broadway Rd – 90% of the population AMI <\$20K per year – highest low income population in the entire county of Maricopa.</p> <p>C. Displacement and Relocation</p> <p>The Displacement and Relocation section projects only two businesses will be relocated and/or displaced Based on the 2015 San Juan Diego Study and our experience and assessment of small businesses in the area there is much larger group of business owners and tenants in the businesses corridor that believe that they may potentially be impacted to the point of relocation and/or displacement – or worse.</p> <p>How is the public involvement / business assistance plan and process reflecting a deep analysis, structure and prioritization to address and mitigate these potential impacts and create success stories from the challenging pre-construction, construction, and post construction impacts?</p>	<p>north of Buckeye Road and west of the alignment to a high of 94 percent between Baseline Road and Broadway Road. Based on this, the EA considered the entire study area to contain a minority population.</p> <p>While the SJDS study may have found that low-income populations are more highly concentrated than identified in the American Community Survey data conducted by the U.S. Census Bureau, both data sets conclude that the census tracts are low-income. Consistent with the guidelines from the Council of Environmental Quality, the EA identified low-income populations that are at or below 150 percent of the poverty line as defined by the U.S. Census and by the U.S. Department of Health and Human Services.</p> <p>Low-income populations are found in amounts of 50 percent or greater in all census tracts except CT 1165 and CT 1167, which are nearing the 50 percent at 43 and 45 percent, and therefore, the statement in the EA that they are generally found throughout the study area is accurate. Low-income populations in the study area range from 43 to 87 percent (Figure 3-19 and Table 3-36). The CTs highlighted by the commenter (CT 1154, 1158.01 and 1158.02) are low-income. Similarly, the EA considered the entire study area to contain low-income populations.</p> <p>C. The EA assesses displacement and relocations resulting from the right-of-way needs of the Project. Business relocations (see Section 3.1.3 and Section 3.14.2.2) from ROW acquisition would be subject to the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Section 3.1.4).</p> <p>Businesses not requiring relocation, but that could be affected by Project construction would benefit from the business assistance program. Valley Metro, City of Phoenix, and additional partners will work together to implement customized business assistance the South Central Light Rail Extension Project. The goal of the programs is to assist business owners by providing tools that can help them continue to maintain business during construction. Some of the tools used are business signage, business assessments and marketing assistance. The final program will be documented in Valley Metro’s Business Assistance and Public Involvement Plans. Business assistance is also discussed in comments 2, 4, 13 and 14.</p> <p>Market forces that influence the operations of businesses are not quantifiable, and the changes as a result of these market forces enter the realm of speculation.</p> <p>Additionally, Valley Metro, its Contractor(s) and the City of Phoenix</p>

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		<p>D. Noise and Vibration Mitigation</p> <p>Add noise and vibration mitigation measures and plans for the following:</p> <p>St. Catherine’s Church 6200 S Central Avenue</p> <ul style="list-style-type: none"> • Latin mass – very reverent/quiet – must have very specific mitigation measures for noise and vibration • St. Catherine’s School 6413 S Central Avenue Important educational institution – must have specific mitigation measures for noise and vibration • St. John Bosco 6600 S Central Avenue <p>E. Project Cost and Project Funding</p> <p>ES.6 - Which portion of the light rail extension investment remains in the community for long-term employment and mitigations?</p> <p>This section identifies that the majority of the funding is for temporary benefit, request more specificity on the long term benefit from the \$635M investment. How much of the total project budget is utilized for the mitigation measures outlined in the Environmental Assessment?</p> <p>Identify sections within the Environmental Assessment to include that the South Central Light Rail Extension will create and provide investment benefits to the existing local community and connect local community members to personal human development, access to jobs and career opportunities. Highly prioritize local community benefit for disconnected youth and/or youth not in any systems that provide a pipeline to workforce development.</p>	<p>would work together to create a construction plan and schedule. The plan and schedule would be developed in coordination with the community, especially those property and business owners most affected so that their major concerns can be addressed. Access would be maintained to businesses during construction (see Table 3-48 for more information on construction-related impacts and mitigation measures).</p> <p>D. See Master Response 10 regarding noise concerns at St. Catherine of Siena School and Church and St. John Bosco.</p> <p>E. As stated in Section 3.4 of the EA, the Project would result in direct employment through new and sustained employment opportunities that would be created to operate and maintain the additional length of the light rail system. Long-term employment would also come from indirect employment opportunities in retail, service and municipal services sectors that would result from the anticipated growth and increased densities within the corridor. For example, the earnings of new construction and transit workers will translate into a proportional increase in consumer demand as these workers purchase goods and services in the area. A further increase in new employment across a wide variety of industrial sectors and occupational classifications is expected as employers hire to meet this increase in local consumer demand. This type of hiring represents the Project’s indirect impact and the anticipated effects on tax revenues and employment in the study area, the City of Phoenix and the region.</p> <p>The enhanced access and mobility that the Project will offer, coupled with potential investment in pedestrian-oriented development and implementation of transit-oriented development policies already adopted by the City of Phoenix, are likely to generate additional jobs in the study area. This will not only create new businesses but could boost the economic activity of existing businesses near the alignment as employees and visitors purchase goods and services. Thus, construction and operation of the Project could result economic growth</p>

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		<p>Community Access to the EA</p> <p>Are the Environmental Assessment and Appendices available in Spanish?</p>	<p>and growth in employment.</p> <p>The cost of mitigation is not a requirement of the EA, only that the mitigation is determined. However, where mitigation measures have been defined within the conceptual design associated with EA, the cost of the mitigation has been included in the cost estimate. For example, the costs to provide roadway capacity improvements at 7th Street/I-17 Freeway, 7th Avenue/I-17 Freeway, and 7th Avenue/Southern Avenue have been included in the cost estimate. The cost estimates in the EA assume a reasonable level of contingency to help offset costs associated with mitigation measures. A final cost estimate will be prepared at the completion of final design.</p> <p>Chapter 1.0 and Section 3.4 discuss benefits to the existing local community and connection between the community to employment and activity centers. A large part of the purpose and need of the Project is to improve access/connectivity to activity centers in the South Central corridor and to regional employment centers and activity destinations. Furthermore, the purpose and need of the Project also includes more reliable transit service and improving mobility for low-income, minority and transit-dependent populations (see Chapter 1.0 of the EA, specifically Sections 1.2 and 1.3).</p> <p>The connectivity and access (Chapter 1.0) coupled with the economic development in the corridor (Sections 3.4 and 3.5) apply to everyone, including as stated in Chapter 1.0 of the EA for low-income, minority and transit-dependent populations in the corridor. This includes youths.</p> <p>Community Access to the EA</p> <p>Two meetings were held with Victor Vidales, Raza Development Corporation, and Promise AZ on June 8 and June 9. An additional participant, Shannon Scutari (representative of the Sustainability Communities Collaborative), attended the June 9 meeting. At the meeting the EA comments, including availability of the EA in Spanish were discussed. The responses in this matrix are reflective of the discussion in the meetings.</p> <p>Also see Master Response #8 for discussion of the availability of the EA in Spanish.</p>
16	Bureau of Reclamation	<p>I just reviewed the cultural section (Appendix A) of the above draft EA. Just a few comments:</p> <p>In the Site Management Summary Table - Historic</p>	<p>Documentation of land ownership for the Western Canal recognizes the Salt River Project/ Bureau of Reclamation. Page 48, Section 5.1.1.2 of the Cultural Resource Inventory and Evaluation Report states “In 1910, Bartlett-Heard and other large South Mountain area landowners</p>

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		<p>Districts...#56 the Western Canal is actually a SRP/Reclamation (Federal) owned irrigation canal. There are a number of other SRP laterals along the proposed alignment as well.</p> <p>Also, within Pueblo Viejo (AZ T:12:73 ASM) there is a SRP lateral 7-10.0. If during testing/data recovery any artifacts are discovered, they must go into a Federal repository. Additionally, if burials are found within Federal land then we have to use the NAGPRA process. This goes for all SRP/Federal owned laterals in the project area</p> <p>Just an FYI for the treatment plan and MOA consultation down the road.</p>	<p>began to subdivide their large land holdings into tracts of 10 to 40 acres. In 1913, the Reclamation Service and local farmers partnered to construct two additional irrigation canals—the Western Canal and the Highline Canal.” In addition, Tables 9 and 12 of the report also acknowledge that the western canal as part of the SRP canal system. The Valley Metro design team is aware of the other SRP laterals and has identified all property owners and easements within the Project area.</p> <p>The SRP laterals are piped within the APE and they are considered ineligible resources for the National Register of Historic Places per Reclamation’s Programmatic Agreement for the SRP system. Nonetheless, Valley Metro recognizes that the SRP laterals are federal property and the testing/data recovery that will occur within the Pueblo Viejo site could fall within an SRP easement. If that is the case, all testing and data recovery will adhere to all federal compliance requirements.</p> <p>Valley Metro reached out to the Bureau of Reclamation on July 1, 2016, and it has agreed to be a concurring party on the MOA and, therefore, further cultural resources coordination will be occurring.</p>

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