

# Metro

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



## **RECAP of Proceedings**

Thursday, January 24, 2019

9:30 AM

One Gateway Plaza, Los Angeles, CA 90012,  
3rd Floor, Metro Board Room

### **Board of Directors - Regular Board Meeting**

#### DIRECTORS PRESENT:

Sheila Kuehl, Chair  
James Butts, Vice Chair  
Kathryn Barger  
Mike Bonin  
Jacquelyn Dupont-Walker  
John Fasana  
Janice Hahn  
Paul Krekorian  
Ara Najarian  
Hilda Solis  
John Bulinski, non-voting member

Phillip A. Washington, Chief Executive Officer

CALLED TO ORDER AT 9:40 a.m.

ROLL CALL

1. APPROVED Consent Calendar Items: 2, 9, 11, 13, 15, 18, 19, 20, 21, 22, 23, 30, 34, 36, 36.1, 41 and 42.

Consent Calendar items were approved by one motion.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	Y	Y	Y	Y	Y	A	Y	Y	A	Y	A

2. **SUBJECT: MINUTES** 2018-0784

APPROVED ON CONSENT CALENDAR Minutes of the Regular Board Meeting held December 6, 2018.

3. **SUBJECT: REMARKS BY THE CHAIR** 2018-0813

RECEIVED remarks by the Chair.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
P	P	P	P	P	P	P	A	P	P	A	P	A

4. **SUBJECT: REPORT BY THE CHIEF EXECUTIVE OFFICER** 2018-0815

RECEIVED report by the Chief Executive Officer.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
P	P	P	P	P	P	P	A	P	P	A	P	A

6. **SUBJECT: CALTRANS ORAL REPORT IN RESPONSE TO THE ROAD MOVABLE BARRIERS SYSTEM MOTION** 2018-0652

CARRIED OVER oral report by Caltrans in response to the Road Movable Barriers System Motion from June 2018.

PK = P. Krekorian	HS = H. Solis	KB = K. Barger	RG = R. Garcia
JF = J. Fasana	JB = J. Butts	JDW = J. Dupont-Walker	
JH = J. Hahn	EG = E. Garcetti	MRT = M. Ridley-Thomas	
MB = M. Bonin	SK = S. Kuehl	AN = A. Najarian	

LEGEND: Y = YES, N = NO, C = HARD CONFLICT, S = SOFT CONFLICT ABS = ABSTAIN, A = ABSENT, P = PRESENT

8. **SUBJECT: I-10 EXPRESSLANES BUSWAY PILOT PROGRAM** 2018-0562

AUTHORIZED the development of an implementation plan for the I-10 ExpressLanes Pilot Program.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	Y	Y	Y	A	Y	A	Y	Y	A	Y	A

9. **SUBJECT: METRO EXPRESSLANES - CUSTOMER SERVICE CENTER OPERATIONS** 2018-0544

AUTHORIZED ON CONSENT CALENDAR the Chief Executive Officer to award firm fixed price Contract No. PS51236000 to Faneuil, Inc. to provide the personnel, services, and expertise to operate the Metro ExpressLanes Customer Service Centers for an eight-year base period, with three, two year options, in the amount of \$83,022,159 for the base period and \$86,352,515 for all option years exercised, for a total of \$169,374,674, subject to resolution of protest(s), if any.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
		C	C					C				

10. **SUBJECT: I-10 AND I-110 METRO EXPRESSLANES "PAY-AS-YOU-USE" MODEL** 2018-0703

APPROVED a one-year pilot of the "Pay-as-You-Use" model.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	Y	A	Y	A	Y	A	Y	Y	A	A	A

11. **SUBJECT: LICENSE AGREEMENT WITH SOUTHERN CALIFORNIA EDISON FOR THE BLUE LINE STORAGE YARD** 2018-0724

AUTHORIZED ON CONSENT CALENDAR the Chief Executive Officer (CEO) to execute a five (5)-year license agreement commencing November 1, 2018 with Southern California Edison ("Licensor") for the Blue Line Storage Yard located next to Division 11 in Long Beach at a rate of \$117,848.33 annually with escalations of three percent (3%) annually for a total license value of \$625,673 over the term.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
								C				

13. **SUBJECT: LOW INCOME FARE SUBSIDY PROGRAM (LIFE)**

2018-0706

APPROVED ON CONSENT CALENDAR:

- A. AUTHORIZING the extension and execution of Memorandums of Understanding (MOU) by the Chief Executive Officer for Low Income Fare is Easy (LIFE) and Immediate Needs Transportation Programs (INTP) including transportation and administration for a period of six months beginning July 1, 2019 through December 31, 2019;
- B. AMENDING the Fiscal Year (FY) 2019 Budget by \$400,000 to increase the LIFE program from \$14.1M to \$14.5M due to Federal Transit Administration Section 5316 Job Access and Reverse Commute (Section 5316) funding received for the LIFE program;
- C. AUTHORIZING the extension and execution of the Memorandums of Understanding (MOU) by the Chief Executive Officer for the Municipal, Included and other TAP Operators that are or will be participating in the LIFE program;
- D. AUTHORIZING the extension and execution of Memorandum of Understanding (MOU) by the Chief Executive Officer for Support for Homeless on Re-Entry Program (SHORE), including transportation and administration for a period of two years beginning FY20, subject to availability of funds approved through the budget process; )
- E. RECEIVING AND FILING LIFE Implementation Update; and
- F. RECEIVING AND FILING LIFE Marketing Update.

14. **SUBJECT: PROP A AND PROP C COMMERCIAL**

2018-0753

**PAPER/SHORT-TERM BORROWING PROGRAMS**

CARRIED OVER DUE TO ABSENCES AND CONFLICTS:

- A. AUTHORIZING the Chief Executive Officer to renew and/or replace the direct-pay letters of credit ("LOC") and direct purchase revolving credit facility ("RCF") to be provided by the banks described below, finalize negotiations with the recommended banks and enter into reimbursement/credit agreements and related documents associated with such LOCs and RCF;

(Continued on next page)

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1. Replace the LOCs currently being provided by Sumitomo Mitsui Banking Corporation (“Sumitomo”) and MUFG Union Bank, N.A. (“MUFG”), for the Proposition A commercial paper program with a LOC to be provided by Barclays Bank PLC (“Barclays”) for a commitment amount of \$200 million for a 3 year term at an estimated cost of \$13.5 million including interest, legal fees and other related expenses.
  2. Replace the LOC currently being provided by Bank of America (“BANA”) of \$75 million for the Proposition C commercial paper program with a revolving credit facility provided by Wells Fargo Bank, N.A. (“Wells Fargo”) for an estimated amount of \$150 million (Metro currently has \$75 million outstanding with Wells Fargo) for a 3 year term at an estimated cost of \$9.9 million including interest, legal fees and other related expenses
- B. If unable to reach agreement with one of the recommended banks described above, AUTHORIZE the Chief Executive Officer to finalize negotiations with each successively ranked bank for LOCs and/or RCFs having 3 year terms and the estimated costs shown in Attachment A;
- C. ADOPTING a resolution with respect to the Proposition A commercial paper and short-term program that approves the selection of Barclays or such other banks selected by the Chief Executive Officer for the Proposition A commercial paper program, and the forms of the reimbursement agreement, fee agreement and reimbursement note in similar form with those on file with the Board Secretary and that makes certain benefits findings in compliance with the Government Code, Attachment B;
- D. ADOPTING a resolution with respect to the Proposition C commercial paper and short-term borrowing program that approves the selection of Wells Fargo or such other banks selected by the Chief Executive Officer for the Proposition C commercial paper program, and the forms of the revolving credit agreement, revolving obligation notes and supplemental subordinate trust agreement in similar form with those on file with the Board Secretary and that makes certain benefits findings in compliance with the Government Code, Attachment C.

15. **SUBJECT: BRIGHTON TO ROXFORD DOUBLE TRACKING PROJECT 2017-0177  
(B2R DESIGN)**

AUTHORIZED ON CONSENT CALENDAR the Chief Executive Officer to execute Modification No. 4 to Contract No. PS2415-34120 with STV, Inc. for the Brighton to Roxford Double Tracking (B2R) Project in the amount of \$2,203,529, increasing the total contract value from \$12,633,429 to \$14,836,958.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
			C					C				

16. **SUBJECT: LONG RANGE TRANSPORTATION PLAN UPDATE** 2018-0622

WITHDRAWN: RECEIVE AND FILE status report on the Long Range Transportation Plan (LRTP) Update, including the following informational items:

- A. Public Engagement Summary Report (Phase 1); and
- B. Draft Mobility Plan to Access Opportunity Framework.

18. **SUBJECT: OPEN STREETS GRANT PROGRAM FY2020 MINI-CYCLE** 2018-0736

APPROVED ON CONSENT CALENDAR:

- A. AUTHORIZING the Metro Open Streets Grant Program FY 2020 Mini-cycle Application and Guidelines (Attachment B); and
- B. REPROGRAMMING \$252,688 in unutilized Cycle Two funds towards the FY 2020 Mini-cycle; and to fully fund Cycle Three awarded events in El Monte and Paramount.

19. **SUBJECT: MEASURE M MULTI-YEAR SUBREGIONAL PROGRAM - LAS VIRGENES/MALIBU SUBREGION** 2018-0767

AUTHORIZED ON CONSENT CALENDAR:

- A. APPROVING:
  - 1. programming of \$22,045,893 in Measure M Multi-Year Subregional Program (MSP) - Active Transportation/Transit/Tech Program (Attachment A);

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2. programming of \$18,824,581 in Measure M MSP Highway Efficiency Program (Attachment B); and

B. the CEO or his designee to negotiate and execute all necessary agreements for approved projects.

20. **SUBJECT: MEMBERSHIP ON METRO GATEWAY CITIES SERVICE COUNCIL** 2018-0621

APPROVED ON CONSENT CALENDAR Mr. Danny Hom for membership on Metro's Gateway Cities Service Council.

21. **SUBJECT: THREE-WAY MUFFLER CATALYSTS** 2018-0723

AUTHORIZED ON CONSENT CALENDAR the Chief Executive Officer to award a two year, Indefinite Delivery, Indefinite Quantity Contract No. MA56400000 to Cummins Incorporated, the lowest responsive and responsible bidder for Three-Way Muffler Catalysts. The award is for a Base year not-to-exceed of \$607,663 inclusive of sales tax, and a one year Option for a not-to-exceed amount of \$622,855, inclusive of sales tax for a total not-to-exceed contract value of \$1,230,518, subject to resolution of protest(s), if any.

22. **SUBJECT: FIRE ALARM PANEL REPLACEMENT PROJECT** 2018-0739

APPROVED ON CONSENT CALENDAR an increase to the Life-of-Project (LOP) budget for the bus facilities fire alarm control panel replacement project (CP 202333) by \$1,850,000, increasing the LOP budget from \$1,624,300 to \$3,474,300, which will enable staff to re-solicit and award a contract to the lowest responsible bidder for the bus facilities fire alarm control panel replacement project.

23. **SUBJECT: LEASE AGREEMENT WITH ANDY AZAD 2002 IRREVOCABLE TRUST** 2018-0748

AUTHORIZED ON CONSENT CALENDAR the Chief Executive Officer to execute a four-year, three month amendment to the existing lease agreement with Andy Azad 2002 Irrevocable Trust ("Landlord") for the use of 44,964 rentable square feet ("RSF") of warehouse space located at 2950 East Vernon Ave, Vernon, commencing May 1, 2019 at a monthly rate of \$40,017.96 for the total value of \$2,189,247 including annual escalations of three percent.

30. **SUBJECT: A650-2015, HEAVY RAIL VEHICLE OVERHAUL AND CRITICAL COMPONENT REPLACEMENT PROGRAM** 2018-0670

APPROVED ON CONSENT CALENDAR:

- A. AUTHORIZING the Chief Executive Officer to increase the Life-of-Project (LOP) budget to Contract No. A650-2015, for the Heavy Rail Vehicle Overhaul and Critical Component Replacement Program (OCCRP), by \$12,399,908 increasing the total Life-of-Project (LOP) budget from \$86,662,000 to \$99,061,908 as funded per attachment C; and
- B. APPROVING Modification No. 3 to Contract A650-2015, with Talgo Inc., for the design and installation of the Train-To-Wayside Communication (TWC) System in the firm-fixed price amount of \$2,044,908.

34. **SUBJECT: METRO GOLD LINE EXTENSION TO CLAREMONT** 2018-0789

APPROVED ON CONSENT CALENDAR the Chief Executive Officer to finalize negotiations with the Gold Line Authority to ensure the extension of the Foothill Alignment to Pomona station as a first phase, consistent with the provisions of Board-adopted Measure R and Measure M Unified Cost Management Policy.

36. **SUBJECT: 2019 LEGISLATIVE PROGRAM** 2018-0439

ADOPTED ON CONSENT CALENDAR:

- A. the proposed 2019 Federal Legislative Program as outlined in Attachment A; and
- B. the proposed 2019 State Legislative Program as outlined in Attachment B.

- 36.1 **SUBJECT: STATE LEGISLATIVE PROGRAM GOALS** 2019-0009

APPROVED ON CONSENT CALENDAR Motion by Butts, Hahn, Solis, Kuehl and Dupont-Walker that the Board Instruct the CEO to include this innovative legislative approach as a priority in the State Legislative Program and Goals contained in Attachment B of the Board Report and specifically relating to Goals 13, and 14.

WE FURTHER MOVE that the Board directs the CEO to secure a primary legislative author and co-authors to sponsor specific legislation authorizing a new "Build California Green Bond" program.

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(Item 36.1 – continued from previous page)

WE FURTHER MOVE that the Board directs the CEO to consult with the LAEDC and consider the updating of the 2011 LAEDC Report Metro used in its advocacy efforts in supporting this legislative initiative and report back to the Executive Management Committee in this regard.

40. **SUBJECT: METRO'S PHOTO ENFORCEMENT PROGRAM** 2018-0737

RECEIVED AND FILED an update on Metro's Photo Enforcement Program.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	Y	Y	Y	A	Y	A	Y	Y	A	A	A

41. **SUBJECT: JUDGE HARRY PREGERSON STATION DEDICATION** 2019-0010

APPROVED ON CONSENT CALENDAR Motion by Garcetti, Ridley-Thomas, Hahn, and Butts that the Board of Directors instruct the CEO to:

- A. prepare a plan to dedicate the Harbor Freeway station along the Green and Silver Line in honor of late Judge Harry Pregerson; and
- B. report back at the March 2019 Executive Management Committee meeting.

42. **SUBJECT: TRANSPORTATION FOR LOS ANGELES UNIFIED SCHOOL DISTRICT STUDENTS DURING A LABOR ACTION** 2019-0012

APPROVED ON CONSENT CALENDAR Motion by Garcetti, Kuehl, and Butts that the Board direct the CEO to provide transit services free of fare for LA Unified students showing their ID from 5am to 7pm on days when the labor action may take place.

43. **SUBJECT: THE RE-IMAGINING OF LA COUNTY: MOBILITY, EQUITY, AND THE ENVIRONMENT (TWENTY-EIGHT BY '28 MOTION RESPONSE)** 2019-0011

CARRIED OVER:

- A. the baseline assumptions and priorities (proposed sacred items) for the funding/financing plan used to deliver Twenty-Eight by '28 as described in Attachment A and listed as follows:
  - 1. NextGen - The results of the NextGen Bus Service Study must not be compromised to advance capital investments;

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2. State of Good Repair (SGR) - To guard against increased maintenance and operations costs and deterioration in service reliability, customer experience, and safety performance, Metro must commit to preserving annual State of Good Repair allocations as a baseline assumption. This will ensure the capital funding level of \$475 million per annum for State of Good Repair;
  3. Propositions A and C - Maintain the current debt limits for Propositions A and C. Prop A and Prop C revenues are a primary funding source for Operations. The budget committed one-third of Prop A and C revenues to Operations for FY18 and FY19 and the commitment is expected to increase over the next decade as state of good repair expenses rise;
  4. Protect Metro's debt covenants - Ensure the funding plan protects Metro's debt covenants to avoid impairing or adversely affecting the rights of bondholders. Issuing large sums of debt significantly increases repayment risk to bondholders;
  5. Unfunded Ancillary Efforts - Ensure funding for the following projects needed to both support implementation of Twenty-Eight by '28 and uphold the integrity of existing Metro transportation system:
    - a. Division 20 (\$699 M) - Division 20 expansion will provide the overnight storage and maintenance space for the additional subway cars being acquired for the Purple Line extension;
    - b. Combined Rail Operations Center (ROC)/Bus Operations Center (BOC) (\$190 M) - a new ROC/BOC is essential for the safe and effective operations of the transit system;
    - c. Maintenance & Material Management System-M3 (\$50 M) - the new M3 is imperative for the effective management of the state of good repair program;
    - d. Train radio for existing subway system (\$75 M) - a new train radio system is essential for the safe and effective operations of the expanded rail network;
    - e. I-210 Barrier Wall (\$200 M) - the intrusion problem on I-210 along the Gold Line must be solved for the long-term safety and reliability of the system;
- B. The commitment to convert to an all-electric bus fleet by 2030 as a baseline assumption and priority (sacred item) for funding/financing plan used to deliver Twenty-Eight by '28;

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(Item 43 – continued from previous page)

C. Pursuit of the creation of a White House Task Force for the 2028 Olympics;  
and

D. RECEIVE AND FILE the Staff Recommendations on Strategies to Pursue  
“The Re-Imagining of LA County” (formerly Twenty-Eight by '28) (Attachment B).

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	Y	N	Y	Y	Y	A	Y	Y	A	Y	A

43.1 APPROVED Motion by Butts that the Board submit these questions and approve the list of instructions to the CEO and prepare specific responses to the questions for incorporation in their report at the Executive Management Committee in February.

### Questions

1. On Attachment B of the Board report, it states that the earliest any revenue realization can happen is 12 to 24 months. Can you further explain in detail the planning and development process for this?
2. Normally a plan like this requires careful planning, analysis and thorough outreach? Is this element part of your 12 to 24 month process?
3. Is it an accurate assumption that you would want to hire consultant experts to lead a study of this magnitude - is the procurement process included as part of the 12 to 24 month process?
  - a. **Instruct** the CEO to bring forward a schedule on the program approach that details the tasks to be performed during the 12-24 months?
4. In Attachment B you propose that a ten-year estimate can generate **up to** \$134 billion in revenues if you add up all the congestion pricing options. How did you arrive at the estimate for these revenues?
5. In the same attachment you state you can realize savings by exploring Public-Private-Partnership opportunities. What other alternatives have you examined besides Public-Private Partnerships as a means to save project costs?
6. Will the Feasibility Studies include exploring new technology, such as monorail or other technology that can significantly reduce project costs and timelines compared to traditional 100 year-old technology like underground heavy rail or light rail? AND
7. How will the NexGen Program fit into the scenarios described in Item 43?

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(Item 43.1 – continued from previous page)

**Instructions**

- A. Direct Metro Staff to return to the Board with information pertaining to the Scope, the proposed Budget and Study Timeline prior to conducting the Feasibility Studies for a Congestion Pricing Pilot strategy;
- B. The CEO shall bring forward a schedule on the program approach that details the tasks to be performed during the 12-24 months?
- C. Monitor the State’s Road Charge Program for potential synergistic opportunities and monitor the City of San Francisco’s Congestion Pricing projects for potential lessons learned.
- D. The proposed “Sacred Items” for Approval before are subject to future Review and Revision if circumstances arise where the Board feels such Review and Revision is warranted.

<b>PK</b>	<b>JF</b>	<b>JH</b>	<b>MB</b>	<b>HS</b>	<b>JB</b>	<b>SK</b>	<b>EG</b>	<b>KB</b>	<b>JDW</b>	<b>MRT</b>	<b>AN</b>	<b>RG</b>
Y	Y	Y	Y	Y	Y	Y	A	Y	Y	A	Y	A

43.2 APPROVED Motion by Solis, Garcetti, Dupont-Walker, Butts and Hahn that the Board direct the CEO to:

- A. Develop an Equity Strategy that considers reinvesting congestion pricing revenue as a key source of funds to minimize economic impacts to low-income drivers;
- B. In partnership with the Board of Directors, nominate subject matter experts in equity as members of the Advisory Council. The final number of subject matter experts would be dependent on the size of the Advisory Council and subject to approval of the Board;
- C. Engage academia, community-based organizations, cities, subregions, and Los Angeles County during the development of the Equity Strategy and consider the effects of congestion pricing on drivers that rely on their vehicles for their livelihood;
- D. Defer inclusion of congestion pricing revenue in any project acceleration financial plan until the completion of the congestion pricing feasibility study and Equity Strategy;
- E. Revise the congestion pricing recommendation language contained in the Board Report to include the directives in this Motion for approval at the February 2019 Board of Directors meeting;

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(Item 43.2 – continued from previous page)

F. Report back on proposed components of the Equity Strategy at the February 2019 Board of Directors meeting.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	Y	Y	Y	Y	Y	A	Y	Y	A	Y	A

44. SUBJECT: CLOSED SESSION

2019-0018

A. Conference with Legal Counsel - Existing Litigation - G.C. 54956.9(d)(1)

City of Beverly Hills v. LACMTA, USDC Case No. CV-18-3891-GW(SSx)

NO REPORT.

B. Conference with Real Property Negotiator - G.C. 54956.8

- Property Description: 2040 Century Park East, Los Angeles  
 Agency Negotiator: Velma C. Marshall  
 Negotiating Party: CC Site One, LLC  
 Under Negotiation: Price and Terms

APPROVED the amount of \$42,205,000 + annual taxes as settlement of the purchase price of a 99 month Temporary Construction Easement.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	C	Y	Y	A	Y	A	C	Y	A	Y	A

- Property Description: 6010-6016 Wilshire Boulevard, Los Angeles  
 Agency Negotiator: Velma C. Marshall  
 Negotiating Party: Nancee Enyart (f/k/a Nancee Elyse Greenwald, et al.  
 Under Negotiation: Price and Terms

APPROVED settlement in the amount of \$8,039,518.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	Y	Y	Y	A	Y	A	C	Y	A	Y	A

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(Item 44 – continued from previous page)

3. Property Description: 6030 Wilshire Boulevard, Los Angeles  
Agency Negotiator: Velma C. Marshall  
Negotiating Party: 6030 Wilshire, LLC  
Under Negotiation: Price and Terms

APPROVED settlement in the amount of \$10,860,221.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	Y	Y	Y	A	Y	A	C	Y	A	Y	A

4. Property Description: 9225 Aviation Boulevard, Los Angeles  
Agency Negotiator: Velma C. Marshall  
Negotiating Party: Clean Energy  
Under Negotiation: Price and Terms

APPROVED just compensation in the amount of \$4,350,000.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	C	Y	Y	A	Y	A	C	Y	A	Y	A

- C. Public Employee Performance Evaluation - G.C. 54957(b)(1)  
Titles: Chief Executive Officer, General Counsel, Board Secretary, Inspector General; and Chief Ethics Officer

NO REPORT.

- D. Public Employment - G.C. 54957(b)(1)  
Title: Chief Executive Officer

The Board extended CEO Phil Washington's term for an additional two years as Metro's CEO.

PK	JF	JH	MB	HS	JB	SK	EG	KB	JDW	MRT	AN	RG
Y	Y	Y	Y	Y	A	Y	A	Y	Y	A	Y	A

RECEIVED General Public Comment

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