19 RESPONSES TO COMMENTS FROM FEDERAL AGENCIES

Los Angeles to Anaheim - RECORD #013502 DETAIL

Status:	Action Pending
Record Date:	01/02/2026
Interest As:	Federal Agency
Full Name:	Connell Dunning

Stakeholder Comments/Issues:

1607

From: Dunning, Connell Sent: Wednesday, December 31, 2025 7:54 AM To: Rothenberg, Scott@HSR Subject: EPA Requesting Air Quality and Community Impact Assessment Technical Report for LA to Anaheim HSR DEIS CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Hello Scott! I hope you are having a great holiday. Happy New Years Eve! Can you please send me the Air Quality and Global Climate Change & Community Impact Assessment Technical Reports for LA to Anaheim DEIS? I noted that the website says to request via a phone call, but I thought I would take the opportunity to say hi. Best of luck with the upcoming Open House/Public Hearings, Connell Technical Reports The following Los Angeles to Anaheim Project Section Technical Reports provide technical details and serve as sources for the Draft EIR/EIS analysis. Electronic versions of the technical reports are available on request by calling (877) 669-0494. Transportation Technical Report Air Quality and Global Climate Change Technical Report Noise and Vibration Technical Report Biological and Aquatic Resources Technical Report Aquatic Resources Delineation Report Aquatic Resources Impact Memorandum Hydrology and Water Resources Technical Report Geology, Soils, and Seismicity Technical Report Paleontological Resources Technical Report Hazardous Materials and Wastes Technical Report Supplement to the Hazardous Materials and Wastes Technical Report Community Impact Assessment Draft Relocation Impact Report Aesthetics and Visual Quality Technical Report ---------- ---------- Connell Dunning U.S. Environmental Protection Agency, Region 9 Environmental Review Section 2 (415) 947-4161 | dunning.connell@epa.gov 75 Hawthorne St, Mail Code CED-2 | SF, California 94105

19.1 Response to Submission 013502 (Connell Dunning, U.S. Environmental Protection Agency, Jan 2, 2026)

19.1.1 1607

The California High-Speed Rail Authority contacted the commenter on December 31, 2025, and provided the requested materials. This comment does not address the sufficiency of the Draft Environmental Impact Report/Environmental Impact Statement, nor does it suggest edits to the document; accordingly, no change has been made to the document in response to this comment.

Los Angeles to Anaheim - RECORD #013834 DETAIL

Status:	Ready for Delimiting
Record Date:	02/03/2026
Interest As:	Federal Agency
Full Name:	Viktoriya A Sirova

Stakeholder Comments/Issues:

Dear Stefan - please see attached comments on Draft Section 4(f) Evaluation for the Los Angeles to Anaheim Project Section, California High Speed Rail Project and advise if you have any follow up questions. Thank you. Respectfully, ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~ Vika Sirova Regional Environmental Officer CA, NV, AZ, and Pacific Islands Office of Environmental Policy and Compliance US Department of the Interior 1323 Club Drive Vallejo, CA 94592 (415) 420-0524 (cell) ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1323 Club Drive
Vallejo, CA 94592

February 3, 2026

IN REPLY REFER TO:
ER 25/0589
4111

Stefan Galvez
Director of Environmental Services
California High-Speed Rail Authority
770 L Street Sacramento, CA 95814

Subject: U.S. Department of the Interior Comments on Draft Section 4(f) Evaluation for the Los Angeles to Anaheim Project Section, California High Speed Rail Project, Draft EIR/EIS

Dear Stefan Galvez:

The U.S. Department of the Interior (Department), as required by the Department of Transportation Act of 1966 (49 U.S.C. §303 and 23 U.S.C. §138), has reviewed the December 2025 California High Speed Rail Authority's (CHSRA) draft evaluation under Section 4(f) for the proposed Los Angeles to Anaheim section of the California High Speed Rail Project. The project proposes to modify 30 miles of an existing railroad corridor for high-speed rail service between Los Angeles Union Station in Los Angeles, California and the Anaheim Regional Transportation Intermodal Center in Anaheim, California.

0869

Following review pursuant to Section 106 of the National Historic Preservation Act, the CHSRA determined that both Shared Passenger Track Alternatives A and B would result in *de minimis* impacts to one recreation resource (Union Pacific Trail Phase II) and one historic property (Rio Hondo). Temporary occupancies of seven recreational resources (Rio Hondo River Trail, Rio Hondo River Bike Path, San Gabriel River Trail, San Gabriel River Bike Path, Coyote Creek North Fork Bikeway, Coyote Creek Main Branch Bikeway Extension, and Brea Creek Bastanchury Corridor) and one historic property (Hunt Foods and Industries Office and Library) do not qualify as a Section 4(f) use as they meet the criterion for temporary occupancy exception under 23 Code of Federal Regulations (CFR) 774.13(d). There are no national historic landmarks or national park units in the vicinity of the project area. In the project proposal, CHSRA has processes in place for evaluation and consulting on unevaluated and as yet unidentified archaeological resources. CHSRA did not identify any Section 6(f) properties in the resource study area.

The Department, through the National Park Service, concurs with CHSRA's finding of *de minimis* impacts for the Los Angeles to Anaheim section of the California High-Speed Rail Project. If you have specific questions related to our comments, please contact Danette Woo at

Danette_Woo@nps.gov. For all other questions, please contact me at Viktoriya_Sirova@ios.doi.gov.

Sincerely,

VIKTORIYA SIROVA

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Date: 2026.02.03 11:52:19 -08'00'

Viktoriya Sirova
Regional Environmental Officer

Electronic distribution: Stefan.galvez@hsr.ca.gov, Los.Angeles_Anaheim@hsr.ca.gov

cc: Barbara Rice, NPS Program Manager: Barbara_rice@nps.gov
Anna Rothleutner, NPS Project Specialist: Anna_rothleutner@nps.gov
Danette Woo, NPS Regional Environmental Coordinator: Danette_Woo@nps.gov

19.2 Response to Submission 013834 (Viktoriya A. Sirova, U.S. Department of the Interior, Feb 3, 2026)

19.2.1 0869

The U.S. Department of the Interior concurs with the *de minimis* impact findings in Chapter 4, Draft Section 4(f) and Section 6(f) Evaluations, of the Draft Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS). The Authority acknowledges the agency's concurrence. No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013918 DETAIL

Status:	Action Pending
Record Date:	02/06/2026
Interest As:	Federal Agency
Full Name:	Zac Appleton

Stakeholder Comments/Issues:

California High Speed Rail Authority, Here is EPA's comment letter for the Los Angeles to Anaheim Draft EIR/EIS. I am submitted this comment letter on behalf of Jean Prijatel and Connell Dunning with the US Environmental Protection Agency, Region 9. Thank you for your consideration,Zac AppletonNEPA Reviewer U.S. Environmental Protection Agency, Region 9 Environmental Review Section – Transportation Team 75 Hawthorne Street, CED 2-2 San Francisco, CA 94105 Phone: 415-972-3321

REGION 9
SAN FRANCISCO, CA 94105

February 4, 2026

Attn: Los Angeles to Anaheim Draft EIR/EIS Comment
LaDonna DiCamillo
Southern California Regional Director
California High-Speed Rail Authority
355 South Grand Avenue, Suite 2050
Los Angeles, California 90071

Subject: EPA Comments on the Draft Environmental Impact Statement for the Los Angeles to Anaheim Section, California Statewide High Speed Rail System, Los Angeles, California

Dear LaDonna DiCamillo:

1576 The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Los Angeles to Anaheim Section of the California Statewide High Speed Rail System, Los Angeles, California, prepared by the California High Speed Rail Authority (Authority). The Draft EIS has been prepared to comply with the National Environmental Policy Act by the State of California pursuant to 23 U.S.C. 327 and a Memorandum of Understanding executed by the Federal Railroad Administration and the State of California, documenting that the Authority is the project's lead agency under NEPA. The EPA has reviewed the Draft EIS per the National Environmental Policy Act and Section 309 of the Clean Air Act. The CAA Section 309 role requires the EPA to review and comment on the environmental impact of any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.

The Draft EIS analyzes the environmental impacts of the Los Angeles to Anaheim portion of the High Speed Train System as well as options for a light maintenance facility, potential stations, and additional connected actions. The EPA has appreciated coordination with the Authority throughout the Statewide and individual section environmental review processes and provide the following recommendations to assist with the general conformity analysis and future health risk assessment.

1577 **General Conformity**

The EPA appreciates the general conformity applicability analysis and supporting information provided in the Draft EIS. We note that the analysis and final applicability determination will be further refined through ongoing coordination with the EPA, South Coast Air Quality Management District, and

1577 California Air Resources Board. We remain available for Clean Air Act consultation as the general conformity process proceeds.

> ***Recommendations:*** The EPA recommends that the Final EIS include any updates to the general conformity applicability analysis based on additional coordination and that it clearly identify the affected nonattainment area(s), the applicable standards and pollutants/precursors evaluated, estimated emissions of each pollutant/precursor, and the nonattainment area(s) and standard(s) for which it is determined that general conformity requirements apply.

1578 ***Demonstrating Conformity by Offsetting Emissions***

The Draft EIS uses general conformity thresholds and offsets to assess impacts to air quality and to mitigate those impacts to a less than significant level. We note that Section 7.11.1 of the Draft EIS identifies that emissions associated with construction of the Shared Passenger Track Alternatives would exceed the general conformity *de minimis* level for NO_X, and that the Authority would mitigate for these impacts by offsetting NO_X emissions to below the general conformity de minimis levels. Under proposed mitigation measure AQ-MM#1, the Draft EIS states that emissions "will be offset through a SCAQMD rule or contractual agreement to fund equivalent emissions reductions that achieve reductions in the same years as construction emissions occur, thus offsetting project-related (to the extent that offsets are available) air quality impacts in real time." The EPA appreciates the Authority's commitment to offset NO_X emissions via a SCAQMD rule or contractual agreement to achieve emissions reductions occuring in the same years as construction emissions occur. While the Draft EIS suggests that NO_X emissions would be offset to *below the general conformity de minimis levels*, we note that general conformity regulations require that the total of direct and indirect emissions from the action are *fully offset* within the nonattainment area.

> ***Recommendation:*** We recommend that the Authority continue to coordinate with SCAQMD and the EPA to ensure that the emissions reductions comply with applicable general conformity and applicable State Implementation Plan requirements and are fully described in the Final EIS.

1579 ***Operations at Hobart Yard***

The Draft EIS describes changes the Authority is proposing to Hobart Yard to accommodate new High Speed Rail infrastructure, including adding a fourth track and storage facilities (e.g., tracks for storage, support, and staging) for current and future freight movement. Estimates of emissions related to these additions will influence the final assessments of air quality impacts, but they were not analyzed in the Draft EIS. We note that they could change the results of the applicability analysis and associated general conformity requirements.

> ***Recommendations:*** To ensure that the Final EIS includes all project-related air quality impacts, the EPA recommends that the Authority coordinate with the EPA to account for emissions related to the proposed goods movement operations at Hobart Yard that are included as a part of the project, particularly emissions of NO_X and direct $PM_{2.5}$.

1580 **Future Health Risk Assessment**

The Draft EIS states that future activity related to new tracks and the BNSF Railway mainline track shift is not currently known and therefore not analyzed in the health risk assessment (p. 5-175). It further states that the Authority would implement AQ-MM#4, which requires an operational health risk

1580

assessment be conducted prior to the start of goods-movement related project operations and requires the analysis and incorporation of additional feasible mitigation to reduce risks to the greatest extent practicable. We note that adjacent city residents and impacted community members are likely to want to understand additional details about AG-MM#4 that are available as of the completion of the Final EIS and Record of Decision.

> ***Recommendations:*** The EPA recommends that the Final EIS and ROD include best estimates of reasonably foreseeable future impacts of anticipated goods-movement related operations associated with project actions. We suggest the Final EIS include additional details about the future health risk assessment AQ-MM#4 (p. 3.3-177) to provide clarity about how risks or impacts would be identified and how it would identify and implement measures to reduce risks.

The EPA appreciates the opportunity to review this Draft Environmental Impact Statement. Please contact Ben Leers at Leers.Ben@epa.gov or (415) 947-4279 for coordination regarding the general conformity determination process and inform our agency when the Final Environmental Impact Statement is available. If you have any questions, please contact me at (415) 947-4167, or contact Connell Dunning, the lead reviewer for this project, at (415) 947-4161 or dunning.connell@epa.gov.

Sincerely,

JEAN PRIJATEL

Digitally signed by JEAN PRIJATEL
Date: 2026.02.04 12:11:20 -08'00'

Jean Prijatel
Manager
Policy and Operations Branch

cc: Sam Wang
Program Supervisor, CEQA-IGR, South Coast Air Quality Management District

Stanley Armstrong
Air Pollution Specialist, California Air Resources Board

19.3 Response to Submission 013918 (Zac Appleton, U.S. Environmental Protection Agency, Feb 6, 2026)

19.3.1 1576

This comment provides an overview of other detailed comments from this agency. The California High-Speed Rail Authority (Authority) thanks the U.S. Environmental Protection Agency (USEPA) for the acknowledgment of ongoing coordination efforts. The comment does not address the sufficiency of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS), nor does it suggest edits to the document; accordingly, no change has been made to the document in response to this comment.

19.3.2 1577

The comment expresses appreciation for the Draft EIR/EIS's information regarding general conformity applicability analysis and recommends the Final EIR/EIS include any updates to that analysis based on additional coordination. The comment also recommends clear identification of affected nonattainment areas and associated detail.

Following coordination with USEPA and the South Coast Air Quality Management District (SCAQMD), the Draft EIR/EIS analysis and the final General Conformity Determination were revised to incorporate California Air Resources Board Emission Factors 2021 (EMFAC2021) off-model adjustment factors, intended for use in conformity determinations and State Implementation Plan submittals.

The adjustment factors remove the estimated emissions benefits that would have been attributable to a suite of California vehicle emissions regulations and thus affect the rates used to calculate the emissions from on-road vehicles used during construction. These off-model adjustment factors were approved by USEPA on November 21, 2025. Accordingly, the following portions of Draft EIR/EIS Section 3.3, Air Quality and Global Climate Change, have been revised: Table 3.3-15, Table 3.3-17, Table 3.3-19, Table 3.3-21, Table 3.3-23, and Table 3.3-25. Refer to Final EIR/EIS Section 16.5.3, Section 3.3: Air Quality and Global Climate Change, of Chapter 16, Corrections and Additions to the Draft Report, for these revisions. The incorporation of the EMFAC2021 off-model adjustment factors did not change any of the Draft EIR/EIS's impact conclusions.

The Draft EIR/EIS clearly identified the affected nonattainment areas, the applicable standards and pollutants/precursors evaluated, the estimated emissions of each pollutant/precursor, and the nonattainment areas and standards for which it is determined that general conformity requirements apply. Information about affected nonattainment areas and applicable standards are as stated in Draft EIR/EIS Section 3.3.5.1, Statewide. Under the federal criteria, the South Coast Air Basin is currently designated as nonattainment for the federal 8-hour ozone (O_3) and particulate matter less than or equal to 2.5 microns in diameter ($PM_{2.5}$) standards; partial nonattainment for federal lead standards (nonattainment in Los Angeles County only, attainment in rest of the South Coast Air Basin); attainment/unclassified for the federal sulfur dioxide (SO_2) and 1-hour nitrogen dioxide (NO_2) standards; attainment/maintenance for the federal annual NO_2 standard; and attainment/maintenance for the federal particulate matter less than or equal to 10 microns in diameter (PM_{10}) and carbon monoxide (CO) standards. The South Coast Air Basin is considered in nonattainment for the state 1-hour O_3, 8-hour O_3, $PM_{2.5}$, and PM_{10} standards; in attainment for the state CO, NO_2, SO_2, and lead standards; and in attainment/unclassified for all other state standards (hydrogen sulfide, sulfates, vinyl chloride, and visibility-reducing particles).

19.3.3 1578

This comment expresses concerns regarding AQ-MM#1, Offset Project Construction Emissions in the South Coast Air Basin through SCAQMD Emissions Offsets Program, and the general conformity regulations of offsetting total direct and indirect emissions.

Refer to Final EIR/EIS Section 16.5.3 of Chapter 16, in which the Authority has revised AQ-MM#1 based upon its coordination with the USEPA, SCAQMD, and the Federal Railroad Administration during the General Conformity Determination review. The revisions clarify that if emission levels

exceed *de minimis* levels, the entire emissions will be offset to meet the General Conformity Rule, and to meet California Environmental Quality Act thresholds to the extent feasible. As required under 40 Code of Federal Regulations Part 93.158(a)(2), the total of direct and indirect emissions from the action will be offset within the same nonattainment area. The Authority will continue coordination with the responsible agencies during project design to ensure that the project improvements comply with all pertinent federal, state, and local requirements.

19.3.4 1579

The comment expresses concern that operational aspects (particularly at Hobart Yard) could change results of the applicability analysis and associated general conformity requirement.

As presented in Table 3.3-33, Summary of 2040 Regional Emissions Changes from Operation, Shared Passenger Track Alternatives A and B (tons per year or metric tons per year for carbon dioxide equivalent), of the Draft EIR/EIS, operations of the Shared Passenger Track Alternatives, as well as the alternatives with inclusion of the high-speed rail station option, are anticipated to result in a net reduction of criteria pollutant emissions relative to existing conditions and the No Project Alternative. Because these reductions are substantial (54 tons per year for nitrogen oxides and 56 tons per year for $PM_{2.5}$), any increase in activity associated with the proposed 101,094 feet of storage and staging tracks is unlikely to generate emissions in excess of the project's net reductions listed in Table 3.3-33. Therefore, the General Conformity Determination only includes an assessment of the project's construction emissions. Any increase in activity within Hobart Yard would not change the applicability analysis or the associated general conformity requirements. Because no changes to the modeling are proposed for the Final EIR/EIS, no coordination is required at this time.

Refer to the responses to comments #0541 and #0543 in Chapter 22, Responses to Comments from Local Agencies, Section 22.13, Response to Submission 013785 (Jivar Afshar, South Coast Air Quality Management District, Jan 30, 2026), regarding the operational health risk associated with the change in operations within Hobart Yard. The Final EIR/EIS reflects a revision to AQ-MM#4, Requirement of a Future Operational Health Risk Assessment, to more expressly state that the Authority will complete any additional California Environmental Quality Act review, National Environmental Policy Act review, or both that may be needed should the supplemental health risk assessment for the rail activities within Hobart Yard demonstrate that health risks would exceed the health risk exposure levels identified in the Draft EIR/EIS. Refer to Final EIR/EIS Section 16.5.3 for these changes. If required, this additional environmental review will include coordination with local, state, and federal agencies, including USEPA.

19.3.5 1580

Refer to the responses to comments #0541 and #0543 in Chapter 22.