22 RESPONSES TO COMMENTS FROM LOCAL AGENCIES

Los Angeles to Anaheim - RECORD #013280 DETAIL

Status:	Action Pending
Record Date:	12/08/2025
Interest As:	Local Agency
Full Name:	Marisa Olguin

Stakeholder Comments/Issues:

0428 Hello – The Chamber has received notice that the CA HSR LA to Anaheim Project – Draft EIR/EIS is now available for public review. I have checked on the CA HSR website and do not find a way to download the project draft. Could you please provide a link to the draft EIR/EIS for download? Thank you, Marisa Olguin Marisa Olguin President / CEO Vernon Chamber of Commerce 2724 Leonis Blvd | Vernon, California, 90058 molguin@vernonchamber.org | 323.583.3313 o www.vernonchamber.org

22.1 Response to Submission 013280 (Marisa Olguin, Vernon Chamber of Commerce, Dec 8, 2025)

22.1.1 0428

The California High-Speed Rail Authority contacted the commenter on December 5, 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 #013291 DETAIL

Status:	Action Pending
Record Date:	12/08/2025
Interest As:	Local Agency
Full Name:	Eileen Hunt

Stakeholder Comments/Issues:

0162 Hi, I'm calling from the city of LA Department of Transportation, and I wanted to get the electronic version of the transportation technical report. My email address
is Eileen.hunt@lacity.org. It, again, it's Eileen. Hunt at LAC.org. E I L E E N. H U N T at L A C I T Y dot ORG. You can also give me a call at 213-972-8481. Again, this is Eileen Hunt with L A DOT. My phone number is 213-972-8481. Thanks. Bye.

22.2 Response to Submission 013291 (Eileen Hunt, City of Los Angeles Department of Transportation, Dec 8, 2025)

22.2.1 0162

The California High-Speed Rail Authority contacted the commenter on December 8, 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 #013327 DETAIL

Status:	Delimited
Record Date:	12/11/2025
Interest As:	Local Agency
Full Name:	Jui Ing Chien

Stakeholder Comments/Issues:

1632 Hello, I am reviewing the Draft EIR for the Los Angeles to Anaheim project section and would like to request GIS data for the proposed alignment and station locations to evaluate whether they intersect with, or occur near, our existing and planned trails and park facilities. Thank you for your assistance. Jui Ing Chien Park Planner Planning and Development Agency COUNTY OF LOS ANGELES DEPARTMENT OF PARKS & RECREATION (626) 588-5317 http://parks.lacounty.gov http://rposd.lacounty.gov http://trails.lacounty.gov

22.3 Response to Submission 013327 (Jui Ing Chien, County of Los Angeles Department of Parks & Recreation, Dec 11, 2025)

22.3.1 1632

The California High-Speed Rail Authority contacted the commenter on December 19 and 29, 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 #013359 DETAIL

Status:	Ready for Delimiting
Record Date:	12/15/2025
Interest As:	Local Agency
Full Name:	Rebekah Soto

Stakeholder Comments/Issues:

1631

Good Afternoon, Can I please get electronic copies of all the Technical Reports associated with the Draft EIR/EIS (see below), as well as HSR responses to OCTA's prior submitted comments? This will assist with our review of the Draft EIR/EIS. Technical Reports 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 Thank you! Rebekah Soto OCTA Senior Project Manager Regional Rail Planning Office: (714) 560-5501 Cell: The information in this e-mail and any attachments are for the sole use of the intended recipient and may contain privileged and confidential information. If you are not the intended recipient, any use, disclosure, copying or distribution of this message or attachment is strictly prohibited. If you believe that you have received this e-mail in error, please contact the sender immediately and delete the e-mail and all of its attachments.

22.4 Response to Submission 013359 (Rebekah Soto, Orange County Transportation Authority, Dec 15, 2025)

22.4.1 1631

The California High-Speed Rail Authority contacted the commenter on December 16, 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 revisions have been made to the document in response to this comment.

Los Angeles to Anaheim - RECORD #013376 DETAIL

Status:	Ready for Delimiting
Record Date:	12/15/2025
Interest As:	Local Agency
Full Name:	Rebekah Soto

Stakeholder Comments/Issues:

0175 Hi, my name is Rebekah Soto, and I'm with the Orange County Transportation Authority. I'm requesting electronic copies of all of the technical reports associated with the Draft EIR/EIS that was released earlier this month. That would include several files, such as the 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 waste technical report, supplement to the hazardous materials and waste technical report, community impact assessment, draft relocation impact report, and the aesthetics and visual quality technical report. You can email them to me at rsoto@octa.net Thank you.

22.5 Response to Submission 013376 (Rebekah Soto, Orange County Transportation Authority, Dec 15, 2025)

22.5.1 0175

The California High-Speed Rail Authority contacted the commenter on December 15, 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 #013410 DETAIL

Status:	Action Pending
Record Date:	12/23/2025
Interest As:	Local Agency
Full Name:	David Berryman

Stakeholder Comments/Issues:

0188 Hi LaDonna, James forwarded me your email below. Can you include me in the notice / distribution of the Draft EIR for LA-A? I will be handling the review. Thanks,David Berryman, PELOSSAN Capital Program Manager d: (714) 560-5681 c: e: dberryman@octa.net LOSSAN Rail Corridor Agency600 South Main StreetOrange, CA 92863

22.6 Response to Submission 013410 (David Berryman, LOSSAN Rail Corridor Agency, Dec 23, 2025)

22.6.1 0188

The California High-Speed Rail Authority contacted the commenter on December 10, 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 #013661 DETAIL

Status:	Action Pending
Record Date:	01/14/2026
Interest As:	Local Agency
Full Name:	Michelle Morrison

Stakeholder Comments/Issues:

Good morning, Please see comments from the Metropolitan Water District of Southern California regarding the California High Speed Rail Authority's Los Angeles to Anaheim Project Section EIR/EIS attached. Metropolitan appreciates the ability to comment on this project.Thank you, Michelle MorrisonSenior Environmental SpecialistThe Metropolitan Water District of Southern California(o) 213-217-7906 * (c)
MMorrison@mwdh2o.comThis communication, together with any attachments or embedded links, is for the sole use of the intended recipient(s) and may contain information that is confidential or legally protected. If you are not the intended recipient, you are hereby notified that any review, disclosure, copying, dissemination, distribution or use of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by return e-mail message and delete the original and all copies of the communication, along with any attachments or embedded links, from your system.

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THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

January 14, 2026 **VIA EMAIL**

Los Angeles to Anaheim Draft EIR/EIS Comment
California High-Speed Rail Authority
355 S. Grand Avenue, suite 2050
Los Angeles, CA 90071
Los.Angeles_Anaheim@hsr.ca.gov

To Whom It May Concern:

Draft Environmental Impact Report/Environmental Impact Statement for
the Los Angeles to Anaheim Project Section of the High-Speed Rail System

0412

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Availability and Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the Los Angeles to Anaheim Project Section of the High-Speed Rail System. The project examines the Los Angeles to Anaheim Project Section (project section). The approximately 30-mile project section would provide high speed rail service between Los Angeles Union Station in Los Angeles and the Anaheim Regional Transportation Intermodal Center in Anaheim, and travels through the cities of Los Angeles, Vernon, Commerce, Bell, Montebello, Pico Rivera, Norwalk, Santa Fe Springs, portions of unincorporated Los Angeles County, La Mirada, Buena Park, Fullerton, and Anaheim.

The Draft EIR/EIS evaluates the impacts of a No Project Alternative and two build alternatives: Shared Passenger Track Alternative A and Shared Passenger Track Alternative B. Shared Passenger Track Alternative A is the preferred alternative and proposes approximately 30 miles of new and upgraded track, overhead contact system, maintenance and traction power facilities (including a light maintenance facility at 26th Street in the City of Vernon), additional freight rail track (including storage track replacement at Hobart Yard), grade separations and roadway modifications, drainage improvements, communications towers, security fencing, relocations of and modifications to passenger train stations, and other necessary facilities to introduce high speed rail service into the existing Los Angeles – San Diego – San Luis Obispo Rail Corridor from south of Los Angeles Union Station beginning at the northern edge of U.S. Highway 101 to the Anaheim Regional Transportation Intermodal Center.

Metropolitan owns and operates facilities within and adjacent to the proposed Project Limits (see attached map). As shown, Metropolitan's Headquarters Building is located on the Los Angeles Union Station campus at 700 N. Alameda Street, Los Angeles, and its Washington Street Pressure Control Structure is located at 2715 Butte Street, Los Angeles.

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0413

Both Metropolitan's Headquarters and a portion of the Washington Street Pressure Control Structure are located within Metropolitan fee-owned property in the Project Limits.

Additionally, six Metropolitan water conveyance pipelines traverse the proposed Project Limits. Specifically, the Palos Verdes Feeder, an approximately 50-inch inside diameter pipeline runs under Soto Street and crosses the Los Angeles River to Washington Street within Metropolitan street easement right-of-way; the Middle Feeder South, and approximately 72-inch inside diameter pipeline traverses the Project Limits within easement right-of-way at Vail Avenue in Commerce; the Lower Feeder, an approximately 78-inch inside diameter pipeline runs within easement right-of-way under Imperial Highway in Norwalk; the West Orange County Feeder, an approximately 54-inch inside diameter pipeline is located within easement right-of-way near Dale Place in Buena Park; the Orange County Feeder, an approximately 33-inch inside diameter pipeline, is located under S. Lewis Street within street easement right-of-way in Anaheim; and the Second Lower Feeder, an approximately 84-inch inside diameter pipeline is located under Ball Road, S. Disneyland Drive, and W. Vermont Avenue, in Anaheim. Metropolitan is concerned with potential impacts to these facilities and rights-of-way that may result from the implementation of the proposed Project.

0414

Metropolitan must be allowed to maintain its rights-of-way and access to its facilities and properties at all times, in order to repair and maintain the current condition of those facilities. In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not permit procedures that could subject the pipes to excessive vehicle, impact, or vibratory loads. Any future design plans associated with this Project should be submitted to the attention of Metropolitan's Substructures Team. Approval of the Project should be contingent on Metropolitan's approval of design plans for portions of the proposed Project that could impact its facilities.

0415

Metropolitan requests that the High-Speed Rail Authority avoid any potential impacts that may occur to Metropolitan's facilities or water infrastructure due to implementation of the proposed Project, or, where applicable, and propose mitigation measures to offset any potential impacts. It will also be necessary for the High-Speed Rail Authority to consider Metropolitan's facilities and water infrastructure in its project planning.

0416

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by contacting Metropolitan's Substructures Team at EngineeringSubstructures@mwdh2o.com. To assist High-Speed Rail Authority in preparing plans that are compatible with Metropolitan's facilities and rights-of-way, enclosed is a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California." Please note that Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's on all designs or plans submitted.

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0417

Additionally, appropriate property rights must be obtained from Metropolitan for any project activities within Metropolitan's property, such as the granting of a road easement or license. The granting of property rights may be subject to Metropolitan's Board of Directors' approval. No work shall be done, including potholing or any studies within Metropolitan's property, prior to the execution of an appropriate agreement. Please contact Metropolitan's Real Property Group regarding the process for obtaining access or property rights at RealEstateServices@mwdh2o.com.

If this project would require future discretionary action by Metropolitan, the document should acknowledge Metropolitan as a Responsible Agency or Approving Agency in the Final EIR/EIS.

We appreciate the opportunity to provide input to your planning process and look forward to receiving future plans and documentation for this Project. If we can be of further assistance, please contact Michelle Morrison at (213) 217-7906 or at MMorrison@mwdh2o.com.

Very truly yours,

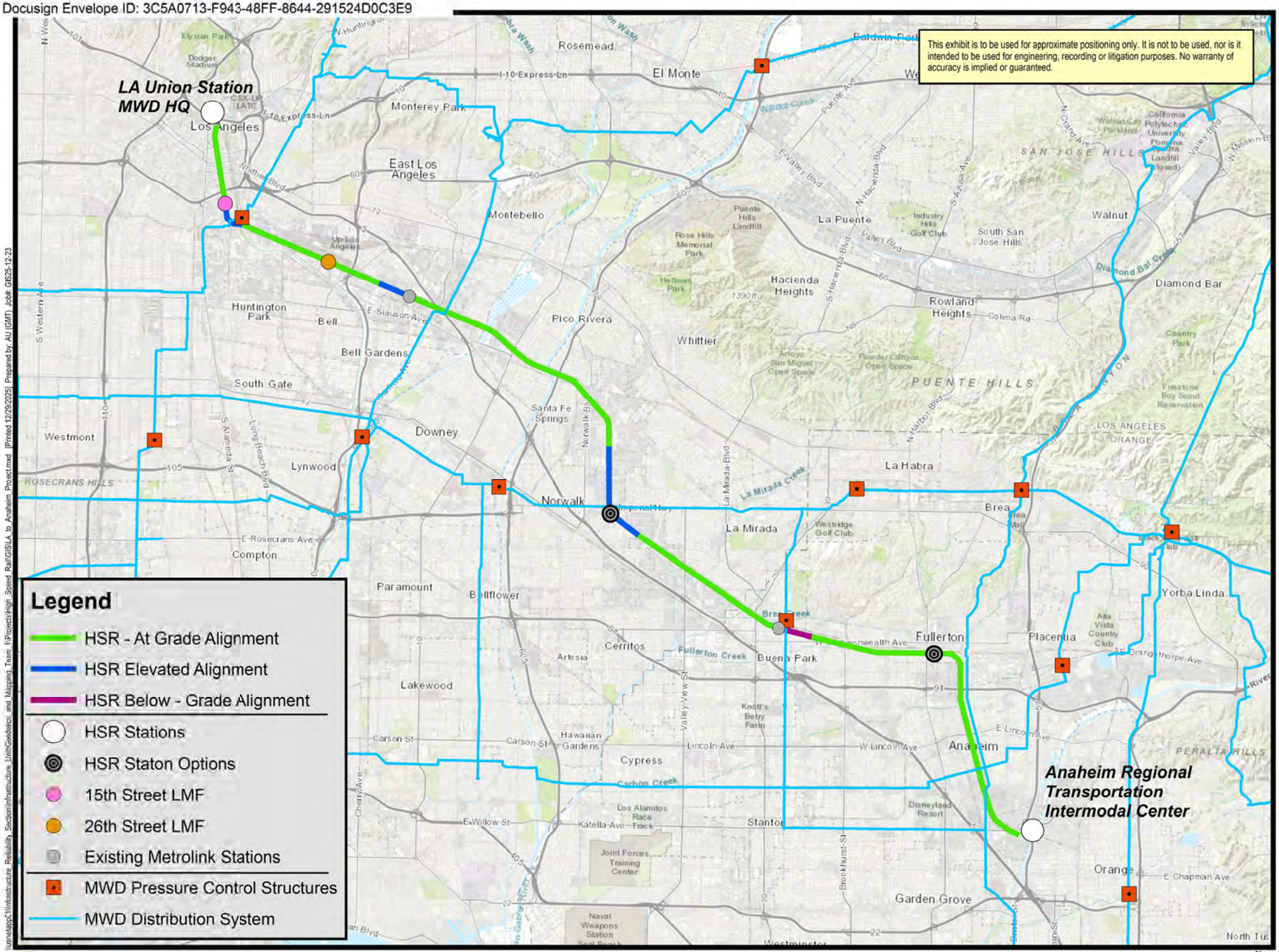
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Sean Carlson
Team Manager, Environmental Planning Section

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The Metropolitan Water District of Southern California
Engineering Services Group

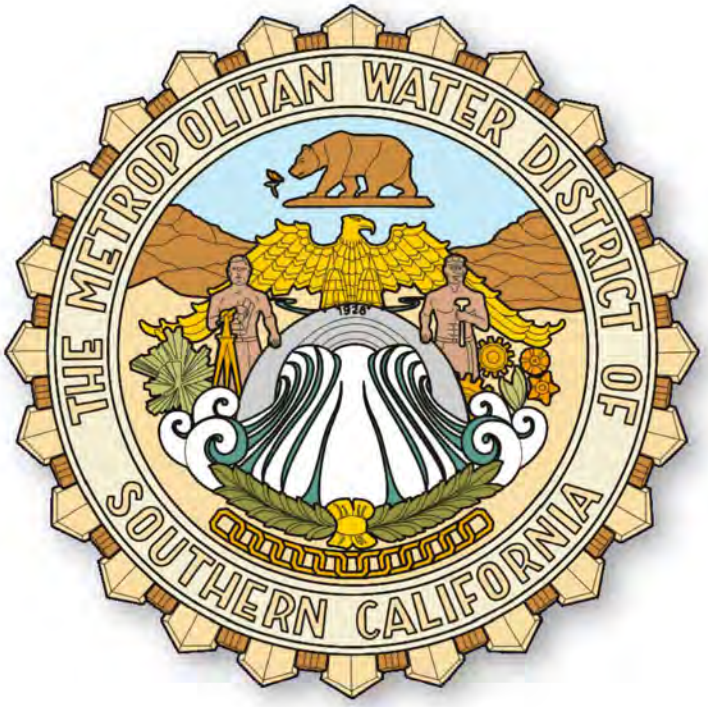
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Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way



July 2018

Prepared By:
The Metropolitan Water District of Southern California
Substructures Team, Engineering Services
700 North Alameda Street
Los Angeles, California 90012

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Additional Copies: To obtain a copy of this document, please contact the Engineering Services Group, Substructures Team.

Disclaimer

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as deemed prudent, to assure that project plans are correct. The appropriate representative from Metropolitan must be contacted at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

PUBLICATION HISTORY:

Initial Release	*July 2018*

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1.0 GENERAL INFORMATION

Note: Underground Service Alert at 811 must be notified at least two working days before excavating in proximity to Metropolitan's facilities.

1.1 Introduction

These guidelines provide minimum design and construction requirements for any utilities, facilities, developments, and improvements, or any other projects or activities, proposed in or near Metropolitan Water District of Southern California (Metropolitan) facilities and rights-of-way. Additional conditions and stipulations may also be required depending on project and site specific conditions. Any adverse impacts to Metropolitan's conveyance system, as determined by Metropolitan, will need to be mitigated to its satisfaction.

All improvements and activities must be designed so as to allow for removal or relocation at builder or developer expense, as set forth in the paramount rights provisions of Section 20.0. Metropolitan shall not be responsible for repair or replacement of improvements, landscaping or vegetation in the event Metropolitan exercises its paramount rights powers.

1.2 Submittal and Review of Project Plans/Utilities and Maps

Metropolitan requires project plans/utilities be submitted for all proposed activities that may impact Metropolitan's facilities or rights-of-way. Project plans shall include copies of all pertinent utilities, sewer line, storm drain, street improvement, grading, site development, landscaping, irrigation and other plans, all tract and parcel maps, and all necessary state and federal environmental documentation. Metropolitan will review the project plans and provide written approval, as it pertains to Metropolitan's facilities and rights-of-way. Written approval from Metropolitan must be obtained, prior to the start of any activity or construction in the area of Metropolitan's facilities or rights-of-way. Once complete project plans and supporting documents are submitted to Metropolitan, it generally takes 30 days to review and to prepare a detailed written response. Complex engineering plans that have the potential for significant impacts on Metropolitan's facilities or rights-of-way may require a longer review time.

Project plans, maps, or any other information should be submitted to Metropolitan's Substructures Team at the following mailing address:

Attn: Substructures Team
The Metropolitan Water District of Southern California
700 North Alameda St.
Los Angeles, CA 90012

General Mailing Address: **P.O. Box 54153**
Los Angeles, CA 90054-0153

Email: EngineeringSubstructures@mwdh2o.com

For additional information, or to request prints of detailed drawings for Metropolitan's facilities and rights-of-way, please contact Metropolitan's Substructures Team at 213-217-7663 or EngineeringSubstructures@mwdh2o.com.

1.3 Identification of Metropolitan's Facilities and Rights-of-Way

Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's, with official recording data, on the following:

A. All applicable plans

B. All applicable tract and parcel maps

Metropolitan's rights-of-ways and existing survey monuments must be tied dimensionally to the tract or parcel boundaries. Metropolitan's Records of Survey must be referenced on the tract and parcel maps with the appropriate Book and Page.

2.0 General Requirements

2.1 Vehicular Access

Metropolitan must have vehicular access along its rights-of-way at all times for routine inspection, patrolling, operations, and maintenance of its facilities and construction activities. All proposed improvements and activities must be designed so as to accommodate such vehicular access.

2.2 Fences

Fences installed across Metropolitan's rights-of-way must include a 16-foot-wide gate to accommodate vehicular access by Metropolitan. Additionally, gates may be required at other specified locations to prevent unauthorized entry into Metropolitan's rights-of-way.

All gates must accommodate a Metropolitan lock or Knox-Box with override switch to allow Metropolitan unrestricted access. There should be a minimum 20-foot setback for gates from the street at the driveway approach. The setback is necessary to allow Metropolitan vehicles to safely pull off the road prior to opening the gate.

2.3 Driveways and Ramps

Construction of 16-foot-wide commercial-type driveway approaches is required on both sides of all streets that cross Metropolitan's rights-of-way. Access ramps, if necessary, must be a minimum of 16 feet wide.

There should be a minimum 20-foot setback for gates from the street at the driveway approach. Grades of ramps and access roads must not exceed 10 percent; if the slope of an access ramp or road must exceed 10 percent due to topography, then the ramp or road must be paved.

2.4 Walks, Bike Paths, and Trails

All walkways, bike paths, and trails along Metropolitan's rights-of-way must be a minimum 12-foot wide and have a 50-foot or greater radius on all horizontal curves if also used as Metropolitan's access roads. Metropolitan's access routes, including all walks and drainage facilities crossing the access routes, must be constructed to American Association of State Highway and Transportation Officials (AASHTO) H-20 loading standards (see Figure 1). Additional requirements will be placed on equestrian trails to protect the water quality of Metropolitan's pipelines and facilities.

2.5 Clear Zones

A 20-foot-wide clear zone is required to be maintained around Metropolitan's manholes and other above-ground facilities to accommodate vehicular access and maintenance. The clear zone should slope away from Metropolitan's facilities on a grade not to exceed 2 percent.

2.6 Slopes

Cut or fill slopes proposed within Metropolitan's rights-of-way must not exceed 10 percent. The proposed grade must not worsen the existing condition. This restriction is required to facilitate Metropolitan use of construction and maintenance equipment and allow uninhibited access to above-ground and below-ground facilities.

2.7 Structures

Construction of structures of any type is not allowed within the limits of Metropolitan's rights-of-way to avoid interference with the operation and maintenance of Metropolitan's facilities and possible construction of future facilities.

Footings and roof eaves of any proposed buildings adjacent to Metropolitan's rights-of-way must meet the following criteria:

A. Footings and roof eaves must not encroach onto Metropolitan's rights-of-way.

B. Footings must not impose any additional loading on Metropolitan's facilities.

C. Roof eaves must not overhang onto Metropolitan's rights-of-way.

Detailed plans of footings and roof eaves adjacent to Metropolitan's rights-of-way must be submitted for Metropolitan's review and written approval, as pertains to Metropolitan's facilities.

2.8 Protection of Metropolitan Facilities

Metropolitan facilities within its rights-of-way, including pipelines, structures, manholes, survey monuments, etc., must be protected from damage by the project proponent or property owner, at no expense to Metropolitan. The exact location, description and method of protection must be shown on the project plans.

2.9 Potholing of Metropolitan Pipelines

Metropolitan's pipelines must be potholed in advance, if the vertical clearance between a proposed utility and Metropolitan's pipeline is indicated to be 4 feet or less. A Metropolitan representative must be present during the potholing operation and will assist in locating the pipeline. Notice is required, a minimum of three working days, prior to any potholing activity.

2.10 Jacked Casings or Tunnels

A. General Requirements

Utility crossings installed by jacking, or in a jacked casing or tunnel under/over a Metropolitan pipeline, must have at least 3 feet of vertical clearance between the outside diameter of the pipelines and the jacked pipe, casing, or tunnel. The actual

cover over Metropolitan's pipeline shall be determined by potholing, under Metropolitan's supervision.

Utilities installed in a jacked casing or tunnel must have the annular space between the utility and the jacked casing or tunnel filled with grout. Provisions must be made for grouting any voids around the exterior of the jacked pipe, casing, or tunnel.

B. Jacking or Tunneling Procedures

Detailed jacking, tunneling, or directional boring procedures must be submitted to Metropolitan for review and approval. The procedures must cover all aspects of operation, including, but not limited to, dewatering, ground control, alignment control, and grouting pressure. The submittal must also include procedures to be used to control sloughing, running, or wet ground, if encountered. A minimum 10-foot clearance must be maintained between the face of the tunneling or receiving pits and outside edges of Metropolitan's facility.

C. Shoring

Detailed drawings of shoring for jacking or receiving pits must be submitted to Metropolitan for review and written-approval. (See Section 10 for shoring requirements).

D. Temporary Support

Temporary support of Metropolitan's pipelines may be required when a utility crosses under a Metropolitan pipeline and is installed by means of an open trench. Plans for temporary support must be reviewed and approved in writing by Metropolitan. (See Section 11, Supports of Metropolitan Facilities).

3.0 Landscaping

3.1 Plans

All landscape plans must show the location and limits of Metropolitan's right-of-way and the location and size of Metropolitan's pipeline and related facilities therein. All landscaping and vegetation shall be subject to removal without notice, as may be required by Metropolitan for ongoing maintenance, access, repair, and construction activities. Metropolitan will not be financially responsible for the removal of any landscaping and vegetation.

3.2 Drought-Tolerant Native and California Friendly Plants

Metropolitan recommends use of drought-tolerant native and California Friendly® plants (excluding sensitive plants) on proposed projects. For more information regarding California Friendly® plants refer to www.bewaterwise.com.

3.3 Trees

Trees are generally prohibited within Metropolitan's rights-of-way as they restrict Metropolitan's ability to operate, maintain and/or install new pipeline(s) located within these rights-of-way. Metropolitan will not be financially responsible for the removal and replacement of any existing trees should they interfere with access and any current or future Metropolitan project located within the right-of-way.

3.4 Other Vegetation

Shrubs, bushes, vines, and groundcover are generally allowed within Metropolitan's rights-of-way. Larger shrubs are not allowed on Metropolitan fee properties; however, they may be allowed within its easements if planted no closer than 15 feet from the outside edges of existing or future Metropolitan facilities. Only groundcover is allowed to be planted directly over Metropolitan pipeline, turf blocks or similar is recommended to accommodate our utility vehicle access. Metropolitan will not be financially responsible for the removal and replacement of the vegetation should it interfere with access and any current or future Metropolitan project.

3.5 Irrigation

Irrigation systems are acceptable within Metropolitan's rights-of-way, provided valves and controllers are located near the edges of the right-of-way and do not interfere with Metropolitan vehicular access. A shutoff valve should also be located along the edge of the right-of-way that will allow the shutdown of the system within the right-of-way should Metropolitan need to do any excavation. No pooling or saturation of water above Metropolitan's pipeline and right-of-way is allowed. Additional restrictions apply to non-potable water such as Recycled Water and are covered on Table 3 of Page 20.

3.6 Metropolitan Vehicular Access

Landscape plans must show Metropolitan vehicular access to Metropolitan's facilities and rights-of-way and must be maintained by the property owner or manager or homeowners association at all times. Walkways, bike paths, and trails within Metropolitan's rights-of-way may be used as Metropolitan access routes. (See Section 2.4, Walks, Bike Paths, and Trails).

4.0 General Utilities

Note: For non-potable piping like sewer, hazardous fluid, storm drain, disinfected tertiary recycled water and recycled water irrigation see Table 1 through Table 3.

4.1 Utility Structures

Permanent utility structures (e.g., manholes, power poles, pull boxes, electrical vaults, etc.) are not allowed within Metropolitan's rights-of-way. Metropolitan requests that all permanent utility structures within public streets be placed as far from its pipelines and facilities as practical, but not closer than 5 feet from the outside edges of Metropolitan facilities.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation.

4.2 Utility Crossings

Metropolitan requests a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and any utility crossing the pipeline. Utility lines crossing Metropolitan's pipelines must be as perpendicular to the pipeline as possible. Cross-section drawings, showing proposed locations and elevations of utility lines and locations of Metropolitan's pipelines and limits of rights-of-way, must be submitted with utility plans, for all

crossings. Metropolitan's pipeline must be potholed under Metropolitan's supervision at the crossings (See Section 2.9).

4.3 Longitudinal Utilities

Installation of longitudinal utilities is generally not allowed along Metropolitan's rights-of-way. Within public streets, Metropolitan requests that all utilities parallel to Metropolitan's pipelines and appurtenant structures (facilities) be located as far from the facilities as possible, with a minimum clearance of 5 feet from the outside edges of the pipeline.

Note: Non-potable utility pipelines are an exception to the 5-foot minimum clearance. Non-potable utility pipelines should have 10 feet of separation (for more information See Table 1 on Page 18).

4.4 Underground Electrical Lines

Underground electrical conduits (110 volts or greater) which cross a Metropolitan's pipeline must have a minimum of 1 foot of vertical clearance between Metropolitan's pipeline and the electrical lines. Longitudinal electrical lines, including pull boxes and vaults, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipeline or structures.

4.5 Fiber Optic Lines

Fiber optic lines installed by directional boring require a minimum of 3 feet of vertical clearance when boring is over Metropolitan's pipelines and a minimum of 5 feet of vertical clearance when boring is under Metropolitan's pipelines. Longitudinal fiber optic lines, including pull boxes, in public streets should have a minimum separation of 5 feet from the edge of a Metropolitan pipelines or structures. Potholing must be performed, under Metropolitan's supervision, to verify the vertical clearances are maintained.

4.6 Overhead Electrical and Telephone Lines

Overhead electrical and telephone lines, where they cross Metropolitan's rights-of-way, must have a minimum 35 feet of clearance, as measured from the ground to the lowest point of the overhead line. Overhead electrical lines poles must be located at least 30 feet laterally from the edges of Metropolitan's facilities or outside Metropolitan's right-of-way, whichever is greater.

Longitudinal overhead electrical and or telephone lines in public streets should have a minimum separation of 10 feet from the edge of a Metropolitan pipelines or structures where possible.

4.7 Sewage Disposal Systems

Sewage disposal systems, including leach lines and septic tanks, must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or the edge of its facilities, whichever is greater. If soil conditions are poor, or other adverse site-specific conditions exist, a minimum distance of 150 feet is required. They must also comply with local and state health code requirements as they relate to sewage disposal systems in proximity to major drinking water supply pipelines.

4.8 Underground Tanks

Underground tanks containing hazardous materials must be a minimum of 100 feet from the outside limits of Metropolitan's rights-of-way or edge of its facilities, whichever is greater. In addition, groundwater flow should be considered with the placement of underground tanks down-gradient of Metropolitan's facilities.

5.0 Specific Utilities: Non-Potable Utility Pipelines

In addition to Metropolitan's general requirements, installation of non-potable utility pipelines (e.g., storm drains, sewers, and hazardous fluids pipelines) in Metropolitan's rights-of-way and public street rights-of-way must also conform to the State Water Resources Control Board's Division of Drinking Water (DDW) regulation (Waterworks Standards) and guidance for separation of water mains and non-potable pipelines and to applicable local county health code requirements. Written approval is required from DDW for the implementation of alternatives to the Waterworks Standards and, effective December 14, 2017, requests for alternatives to the Waterworks Standards must include information consistent with: DDW's Waterworks Standards Main Separation Alternative Request Checklist.

In addition to the following general guidelines, further review of the proposed project must be evaluated by Metropolitan and requirements may vary based on site specific conditions.

A. Sanitary Sewer and Hazardous Fluids (General Guideline See Table 1 on Page 18)

B. Storm Drain and Recycled Water (General Guideline See Table 2 on Page 19)

C. Irrigation with Recycled Water (General Guideline See Table 3 on Page 20)

D. Metropolitan generally does not allow Irrigation with recycled water to be applied directly above its treated water pipelines

E. Metropolitan requests copies of project correspondence with regulating agencies (e.g., Regional Water Quality Control Board, DDW); regarding the application of recycled water for all projects located on Metropolitan's rights-of-way

6.0 Cathodic Protection/Electrolysis Test Stations

6.1 Metropolitan Cathodic Protection

Metropolitan's existing cathodic protection facilities in the vicinity of any proposed work must be identified prior to any grading or excavation. The exact location, description, and type of protection must be shown on all project plans. Please contact Metropolitan for the location of its cathodic protection stations.

6.2 Review of Cathodic Protection Systems

Metropolitan must review any proposed installation of impressed-current cathodic protection systems on pipelines crossing or paralleling Metropolitan's pipelines to determine any potential conflicts with Metropolitan's existing cathodic protection system.

7.0 Drainage

7.1 Drainage Changes Affecting Metropolitan Rights-of-Way

Changes to existing drainage that could affect Metropolitan's rights-of-way require Metropolitan's approval. The project proponent must provide acceptable solutions to ensure Metropolitan's rights-of-way are not negatively affected by changes in the drainage conditions. Plans showing the changes, with a copy of a supporting hydrology report and hydraulic calculations, must be submitted to Metropolitan for review and approval. Long term maintenance of any proposed drainage facilities must be the responsibility of the project proponent, City, County, homeowner's association, etc., with a clear understanding of where this responsibility lies. If drainage must be discharged across Metropolitan's rights-of-way, it must be carried across by closed conduit or lined open channel and must be shown on the plans.

7.2 Metropolitan's Blowoff and Pumpwell Structures

Any changes to the existing local watercourse systems will need to be designed to accommodate Metropolitan's blowoff and pumpwell structures, which periodically convey discharged water from Metropolitan's blowoff and pumping well structures during pipeline dewatering. The project proponents' plans should include details of how these discharges are accommodated within the proposed development and must be submitted to Metropolitan for review and approval. Any blowoff discharge lines impacted must be modified accordingly at the expense of the project proponent.

8.0 Grading and Settlement

8.1 Changes in Cover over Metropolitan Pipelines

The existing cover over Metropolitan's pipelines must be maintained unless Metropolitan determines that proposed changes in grade and cover do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance capability. Load and settlement or rebound due to change in cover over a Metropolitan pipeline or ground in the area of Metropolitan's rights-of-way will be factors considered by Metropolitan during project review.

In general, the minimum cover over a Metropolitan pipeline is 4 feet and the maximum cover varies per different pipeline. Any changes to the existing grade may require that Metropolitan's pipeline be potholed under Metropolitan's supervision to verify the existing cover.

8.2 Settlement

Any changes to the existing topography in the area of Metropolitan's pipeline or right-of-way that result in significant settlement or lateral displacement of Metropolitan's pipelines are not acceptable. Metropolitan may require submittal of a soils report showing the predicted settlement of the pipeline at 10-foot intervals for review. The data must be carried past the point of zero change in each direction and the actual size and varying depth of the fill must be considered when determining the settlement. Possible settlement due to soil collapse, rebound and lateral displacement must also be included.

In general, the typical maximum allowed deflection for Metropolitan's pipelines must not exceed a deflection of 1/4-inch for every 100 feet of pipe length. Metropolitan may require additional information per its Geotechnical Guidelines. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

9.0 Construction Equipment

9.1 Review of Proposed Equipment

Use of equipment across or adjacent to Metropolitan's facilities is subject to prior review and written approval by Metropolitan. Excavation, backfill, and other work in the vicinity of Metropolitan's facilities must be performed only by methods and with equipment approved by Metropolitan. A list of all equipment to be used must be submitted to Metropolitan a minimum of 30 days before the start of work.

A. For equipment operating within paved public roadways, equipment that imposes loads not greater than that of an AASHTO H-20 vehicle (see Figure 1 on Page 21) may operate across or adjacent to Metropolitan's pipelines provided the equipment operates in non-vibratory mode and the road remains continuously paved.

B. For equipment operating within unpaved public roadways, when the total cover over Metropolitan's pipeline is 10 feet or greater, equipment imposing loads no greater than those imposed by an AASHTO H-20 vehicle may operate over or adjacent to the pipeline provided the equipment is operated in non-vibratory mode. For crossings, vehicle path shall be maintained in a smooth condition, with no breaks in grade for 3 vehicle lengths on each side of the pipeline.

9.2 Equipment Restrictions

In general, no equipment may be used closer than 20 feet from all Metropolitan above-ground structures. The area around the structures should be flagged to prevent equipment encroaching into this zone.

9.3 Vibratory Compaction Equipment

Vibratory compaction equipment may not be used in vibratory mode within 20 feet of the edge of Metropolitan's pipelines.

9.4 Equipment Descriptions

The following information/specifications for each piece of equipment should be included on the list:

A. A description of the equipment, including the type, manufacturer, model year, and model number. For example, wheel tractor-scraper, 1990 Caterpillar 627E.

B. The empty and loaded total weight and the corresponding weight distribution. If equipment will be used empty only, it should be clearly stated.

C. The wheel base (for each axle), tread width (for each axle), and tire footprint (width and length) or the track ground contact (width and length), and track gauge (center to center of track).

10.0 Excavations Close to Metropolitan Facilities

10.1 Shoring Design Submittal

Excavation that impacts Metropolitan's facilities requires that the contractor submit an engineered shoring design to Metropolitan for review and acceptance a minimum of 30 days before the scheduled start of excavation. Excavation may not begin until the shoring design is accepted in writing by Metropolitan.

Shoring design submittals must include all required trenches, pits, and tunnel or jacking operations and related calculations. Before starting the shoring design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements, particularly as to any special procedures that may be required.

10.2 Shoring Design Requirements

Shoring design submittals must be stamped and signed by a California registered civil or structural engineer. The following requirements apply:

A. The submitted shoring must provide appropriate support for soil adjacent to and under Metropolitan's facilities.

B. Shoring submittals must include detailed procedures for the installation and removal of the shoring.

C. Design calculations must follow the Title 8, Chapter 4, Article 6 of the California Code of Regulations (CCR) guidelines. Accepted methods of analysis must be used.

D. Loads must be in accordance with the CCR guidelines or a soils report by a geotechnical consultant.

E. All members must be secured to prevent sliding, falling, or kickouts.

Metropolitan's pipelines must be located by potholing under Metropolitan's supervision before the beginning construction. Use of driven piles within 20 feet of the centerline of Metropolitan's pipeline is not allowed. Piles installed in drilled holes must have a minimum 2-foot clearance between Metropolitan's pipeline and the edge of the drilled hole, and a minimum of 1-foot clearance between any part of the shoring and Metropolitan's pipeline.

11.0 Support of Metropolitan Facilities

11.1 Support Design Submittal

If temporary support of a Metropolitan facility is required, the contractor shall submit a support design plan to Metropolitan for review and approval a minimum of 30 days before the scheduled start of work. Work may not begin until the support design is approved in writing by Metropolitan. Before starting design, the design engineer should consult with Metropolitan regarding Metropolitan's requirements.

11.2 Support Design Requirements

Support design submittals must be prepared, stamped, and signed by a California registered civil or structural engineer. The following requirements apply:

A. Support drawings must include detailed procedures for the installation and removal of the support system.

B. Design calculations must follow accepted practices, and accepted methods of analysis must be used.

C. Support designs must show uniform support of Metropolitan's facilities with minimal deflection.

D. The total weight of the facility must be transferred to the support system before supporting soil is fully excavated.

E. All members must be secured to prevent sliding, falling, or kickouts.

12.0 Backfill

12.1 Metropolitan Pipeline Not Supported

In areas where a portion of Metropolitan pipeline is not supported during construction, the backfill under and to an elevation of 6 inches above the top of the pipeline must be one-sack minimum cement sand slurry. To prevent adhesion of the slurry to Metropolitan's pipeline, a minimum 6-mil-thick layer of polyethylene sheeting or similar approved sheeting must be placed between the concrete support and the pipeline.

12.2 Metropolitan Pipeline Partially Exposed

In areas where a Metropolitan pipeline is partially exposed during construction, the backfill must be a minimum of 6 inches above the top of the pipeline with sand compacted to minimum 90 percent compaction.

12.3 Metropolitan Cut and Cover Conduit on Colorado River Aqueduct (CRA)

In areas where a Metropolitan cut and cover conduit is exposed, the following guidelines apply:

A. No vehicle or equipment shall operate over or cross the conduit when the cover is less than 3 feet.

B. Track-type dozer with a gross vehicle weight of 12,000 lbs or less may be used over the conduit when the cover is a minimum of 3 feet.

C. Wheeled vehicles with a gross vehicle weight of 8,000 lbs or less may operate over the conduit when the cover is a minimum of 4 feet.

D. Tracked dozer or wheeled vehicle should be used to push material over the conduit from the side.

E. Tracked dozer or wheeled vehicle should gradually increase cover on one side of the conduit and then cross the conduit and increase cover on the other side of the conduit. The cover should be increased on one side of the conduit until a maximum of 2 feet of fill has been placed. The cover over the conduit is not allowed to be more than 2 feet higher on one side of the conduit than on the other side.

F. The cover should be gradually increased over the conduit until the grade elevations have been restored.

13.0 Piles

13.1 Impacts on Metropolitan Pipelines

Pile support for structures could impose lateral, vertical and seismic loads on Metropolitan's pipelines. Since the installation of piles could also cause settlement of Metropolitan pipelines, a settlement and/or lateral deformation study may be required for pile installations within 50 feet of Metropolitan's pipelines. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

13.2 Permanent Cast-in-place Piles

Permanent cast-in-place piles must be constructed so that down drag forces of the pile do not act on Metropolitan's pipeline. The pile must be designed so that down drag forces are not developed from the ground surface to springline of Metropolitan's pipeline.

Permanent cast-in-place piles shall not be placed closer than 5 feet from the edge of Metropolitan's pipeline. Metropolitan may require additional information per its Geo-technical Guidelines for pile installation. Please contact Metropolitan's Substructures Team for a copy of the Geotechnical Guidelines.

14.0 Protective Slabs for Road Crossings Over Metropolitan Pipelines

Protective slabs must be permanent cast-in-place concrete protective slabs configured in accordance with Drawing SK-1 (See Figure 2 on Page 22).

The moments and shear for the protective slab may be derived from the American Association of State Highway and Transportation Officials (AASHTO). The following requirements apply:

A. The concrete must be designed to meet the requirements of AASHTO

B. Load and impact factors must be in accordance with AASHTO. Accepted methods of analysis must be used.

C. The protective slab design must be stamped and signed by a California registered civil or structural engineer and submitted to Metropolitan with supporting calculations for review and approval.

Existing protective slabs that need to be lengthened can be lengthened without modification, provided the cover and other loading have not been increased.

15.0 Blasting

At least 90 days prior to the start of any drilling for rock excavation blasting, or any blasting in the vicinity of Metropolitan's facilities, a site-specific blasting plan must be submitted to Metropolitan for review and approval. The plan must consist of, but not be limited to, hole diameters, timing sequences, explosive weights, peak particle velocities (PPV) at Metropolitan pipelines/structures, and their distances to blast locations. The PPV must be estimated based on a site-specific power law equation. The power law equation provides the peak particle velocity versus the scaled distance and must be calibrated based on measured values at the site.

16.0 Metropolitan Plan Review Costs, Construction Costs and Billing

16.1 Plan Review Costs

Metropolitan plan reviews requiring 8 labor hours or less are generally performed at no cost to the project proponent. Metropolitan plan reviews requiring more than 8 labor hours must be paid by the project proponent, unless the project proponent has superior rights at the project area. The plan review will include a written response detailing Metropolitan's comments, requirements, and/or approval.

A deposit of funds in the amount of the estimated cost and a signed letter agreement will be required from the project proponent before Metropolitan begins or continues a detailed engineering plan review that exceeds 8 labor hours.

16.2 Cost of Modification of Facilities Performed by Metropolitan

Cost of modification work conducted by Metropolitan will be borne by the project proponent, when Metropolitan has paramount/prior rights at the subject location.

Metropolitan will transmit a cost estimate for the modification work to be performed (when it has paramount/prior rights) and will require that a deposit, in the amount of the estimate, be received before the work will be performed.

16.3 Final Billing

Final billing will be based on the actual costs incurred, including engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the total cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice for the additional amount will be forwarded for payment.

17.0 Street Vacations and Reservation of Easements for Metropolitan

A reservation of an easement is required when all or a portion of a public street where Metropolitan facilities are located is to be vacated. The easement must be equal to the street width being vacated or a minimum 40 feet. The reservation must identify Metropolitan as a "public entity" and not a "public utility," prior to recordation of the vacation or tract map. The reservation of an easement must be submitted to Metropolitan for review prior to final approval.

18.0 Metropolitan Land Use Guidelines

If you are interested in obtaining permission to use Metropolitan land (temporary or long term), a Land Use Form must be completed and submitted to Metropolitan for review and consideration. A nonrefundable processing fee is required to cover Metropolitan's costs for reviewing your request. Land Use Request Forms can be found at:

http://mwdh2o.com/PDF_Doing_Your_Business/4.7.1_Land_Use_Request_form_revised.pdf

The request should be emailed to RealEstateServices@mwdh2o.com,or contact the Real Property Development and Management (RPDM) Group at (213) 217-7750.

After the initial application form has been submitted, Metropolitan may require the following in order to process your request:

A. A map indicating the location(s) where access is needed, and the location & size (height, width and depth) of any invasive subsurface activity (boreholes, trenches, etc.).

B. The California Environmental Quality Act (CEQA) document(s) or studies that have been prepared for the project (e.g., initial study, notice of exemption, Environmental Impact Report (EIR), Mitigated Negative Declaration (MND), etc.).

C. A copy of an ACORD insurance certification naming Metropolitan as an additional insured, or a current copy of a statement of self-insurance.

D. Confirmation of the legal name of the person(s) or entity(ies) that are to be named as the permittee(s) in the entry permit.

E. Confirmation of the purpose of the land use.

F. The name of the person(s) with the authority to sign the documents and any specific signature title block requirements for that person or any other persons required to sign the document (i.e., legal counsel, Board Secretary/Clerk, etc.).

G. A description of any vehicles that will have access to the property. The exact make or model information is not necessary; however, the general vehicle type, expected maximum dimensions (height, length, width), and a specific maximum weight must be provided.

Land use applications and proposed use of the property must be compatible with Metropolitan's present and/or future use of the property. Any preliminary review of your request by Metropolitan shall not be construed as a promise to grant any property rights for the use of Metropolitan's property.

19.0 Compliance with Environmental Laws and Regulations

As a public agency, Metropolitan is required to comply with all applicable environmental laws and regulations related to the activities it carries out or approves. Consequently, project plans, maps, and other information must be reviewed to determine Metropolitan's obligations pursuant to state and federal environmental laws and regulations, including, but not limited to:

A. California Environmental Quality Act (CEQA) (Public Resources Code 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 1500-15387)

B. Federal Endangered Species Act (ESA) of 1973, 16 U.S.C. §§ 1531, et seq.

C. California Fish and Game Code Sections 2050-2069 (California ESA)

D. California Fish and Game Code Section 1602

E. California Fish and Game Code Sections 3511, 4700, 5050 and 5515 (California fully protected species)

F. Federal Migratory Bird Treaty Act (MBTA), 16 U.S.C. §§ 703-712

G. Federal Clean Water Act (including but not limited to Sections 404 and 401) 33 U.S.C. §§ 1342, 1344)

H. Porter Cologne Water Quality Control Act of 1969, California Water Code §§ 13000-14076.

I. Title 22, California Code of Regulations, Chapter 16 (California Waterworks Standards), Section 64572 (Water Main Separation)

Metropolitan may require the project applicant to pay for any environmental review, compliance and/or mitigation costs incurred to satisfy such legal obligations.

20.0 Paramount Rights / Metropolitan's Rights within Existing Rights-of-Way

Facilities constructed within Metropolitan's rights-of-way shall be subject to the paramount right of Metropolitan to use its rights-of-way for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove or relocate any facilities from its rights-of-way, such removal and replacement or relocation shall be at the expense of the owner of the facility.

21.0 Disclaimer and Information Accuracy

Metropolitan assumes no responsibility for the accuracy of the substructure information herein provided. The user assumes responsibility for verifying substructure locations before excavating and assumes all liability for damage to Metropolitan's facilities as a result of such excavation. Additionally, the user is cautioned to conduct surveys and other field investigations as you may deem prudent, to assure that your project plans are correct. The relevant representative from Metropolitan must be called at least two working days, before any work activity in proximity to Metropolitan's facilities.

It generally takes 30 days to review project plans and provide written responses. Metropolitan reserves the right to modify requirements based on case-specific issues and regulatory developments.

Table 1: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Sanitary Sewer[2] or Hazardous Fluid Pipeline[3]

Pipeline Crossings	Metropolitan requires that sanitary sewer and hazardous fluid pipelines that cross Metropolitan's pipelines have special pipe construction (no joints) **and** secondary containment[4]. This is required for the full width of Metropolitan's rights-of-way or within 10 feet tangent to the outer edges of Metropolitan's pipeline within public streets. Additionally, sanitary sewer and hazardous fluid pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance between the top and the bottom of Metropolitan's pipeline and the pipe casing. These requirements apply to all sanitary sewer crossings regardless if the sanitary sewer main is located below or above Metropolitan's pipeline.
Parallel Pipeline	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requires that all parallel sanitary sewer, hazardous fluid pipelines and/or non-potable utilities be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, longitudinal pipelines require special pipe construction (no joints) **and** secondary containment[4].
Sewer Manhole	Sanitary sewer manholes are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests manholes parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment[5].

Notes:

[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Sanitary sewer requirements apply to all recycled water treated to less than disinfected tertiary recycled water (disinfected secondary recycled water or less).* Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (Water Recycling Criteria), Section 60301.

[3] *Hazardous fluids include e.g., oil, fuels, chemicals, industrial wastes, wastewater sludge, etc.*

[4] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[5] *Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.*

Table 2: General Guidelines for Pipeline Separation between Metropolitan's Pipeline[1] and Storm Drain and/or Disinfected Tertiary Recycled Water[2]

Pipeline Crossings	Metropolitan requires crossing pipelines to be special pipe construction (no joints) or have secondary containment[3] within 10-feet tangent to the outer edges of Metropolitan's pipeline. Additionally, pipelines crossing Metropolitan's pipelines must be perpendicular and maintain a minimum 1-foot vertical clearance.
Parallel Pipeline	Metropolitan generally does not permit the installation of longitudinal pipelines along its rights-of-way. Within public streets, Metropolitan requests that all parallel pipelines be located a minimum of 10 feet from the outside edges of Metropolitan's pipelines. When 10-foot horizontal separation criteria cannot be met, special pipe construction (no joints) or secondary containment[3] are required.
Storm Drain Manhole	Permanent utility structures (e.g., manhole. catch basin, inlets) are not allowed within Metropolitan's rights-of-way. Within public streets, Metropolitan requests all structures parallel to its pipeline be located a minimum of 10 feet from the outside edges of its pipelines. When 10 foot horizontal separation criteria cannot be met, the structure must have secondary containment[4].

Notes:

[1] *Separation distances are measured from the outer edges of each pipe.*

[2] *Disinfected tertiary recycled water as defined* in Title 22, California Code of Regulations, Chapter 3 (*Water Recycling Criteria*), Section 60301.

[3] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[4] *Secondary Containment for Structures – Secondary containment consists of external HDPE liner or other approved method.*

Table 3: General Guidelines for Pipeline Separation[1] between Metropolitan's Pipeline and Recycled Water[2,4] Irrigations

Pressurized recycled irrigation mainlines	• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing pressurized recycled irrigation mainlines must be special pipe construction (no joints) or have secondary containment[3] within 10-feet tangent to the outer edges of Metropolitan's pipeline. • Longitudinal - must maintain a minimum 10-foot horizontal separation and route along the perimeter of Metropolitan's rights-of-way where possible.
Intermittently Energized Recycled Water Irrigation System Components	• Crossings - must be perpendicular and maintain a minimum 1-foot vertical clearance. Crossing irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment[3]. • Longitudinal – must maintain a minimum 5-foot horizontal separation between all intermittently energized recycled water irrigation system components (e.g. irrigation lateral lines, control valves, rotors) and the outer edges of Metropolitan's pipeline. Longitudinal irrigation laterals within 5-feet tangent to the outer edges of Metropolitan's pipeline must be special pipe construction (no joints) or have secondary containment[3].
Irrigation Structures	Irrigation structures such as meters, pumps, control valves, etc. must be located outside of Metropolitan's rights-of-way.
Irrigation spray rotors near Metropolitan's aboveground facilities	Irrigation spray rotors must be located a minimum of 20-foot from any Metropolitan above ground structures with the spray direction away from these structures. These rotors should be routinely maintained and adjusted as necessary to ensure no over-spray into 20-foot clear zones.
Irrigations near open canals and aqueducts	Irrigation with recycled water near open canals and aqueducts will require a setback distance to be determined based on site-specific conditions. Runoff of recycled water must be contained within an approved use area and not impact Metropolitan facilities. Appropriate setbacks must also be in place to prevent overspray of recycled water impacting Metropolitan's facilities.

Notes:

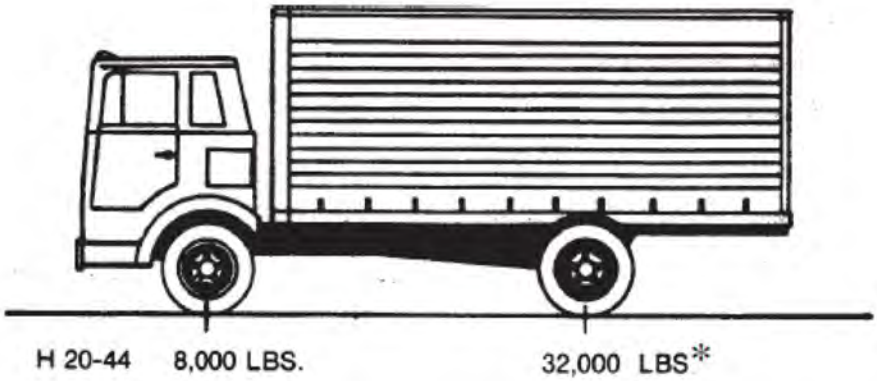
[1] *Separation distances are measured from the outer edges of each pipe.*

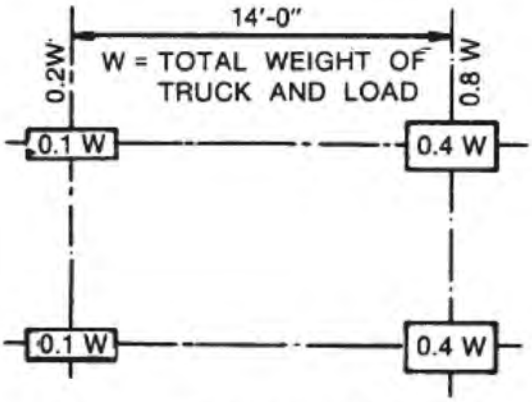
[2] *Requirements for recycled water irrigation apply to all levels of treatment of recycled water for non-potable uses.* Recycled water definitions are included in Title 22, California Code of Regulations, Chapter 3 (*Water Recycling Criteria*), Section 60301.

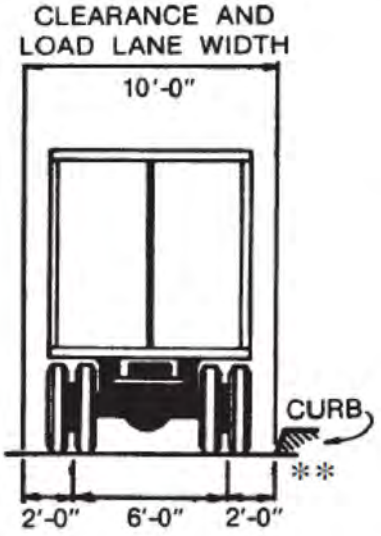
[3] *Secondary Containment for Pipeline - Secondary containment consists of a continuous pipeline sleeve (no joints). Examples acceptable to Metropolitan include welded steel pipe with grout in annular space and cathodic protection (unless coated with non-conductive material) and High Density Polyethylene (HDPE) pipe with fusion-welded joints.*

[4] *Irrigation with recycled water shall not be applied directly above Metropolitan's treated water pipelines.*

Figure 1: AASHTO H-20 Loading

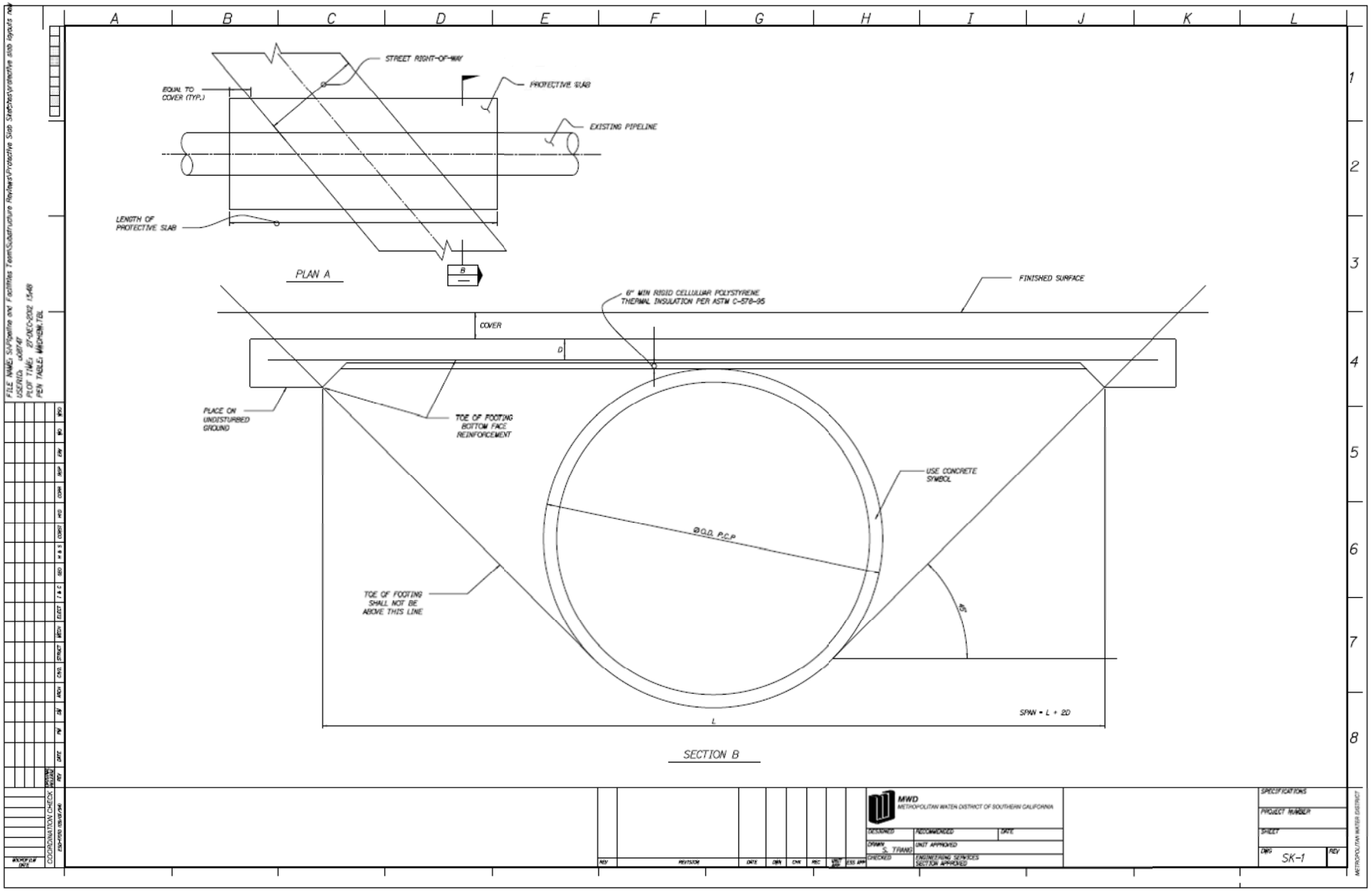






Note: The H loadings consist of a two-axle truck or the corresponding lane loadings as illustrated above. The H loadings are designated "H" followed by a number indicating the gross weight in tons of the standard truck.

Figure 2: Drawing SK-1



22.7 Response to Submission 013661 (Michelle Morrison, The Metropolitan Water District of Southern California, Jan 14, 2026)

22.7.1 0412

The commenter provides a general summary of the overall project components and Shared Passenger Track Alternative A and provides the addresses of Metropolitan Water District of Southern California's (Metropolitan) headquarters and Washington Street Pressure Control Structure, as well as a map depicting the general locations. No revisions have been made to the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) in response to this comment.

22.7.2 0413

Refer to Standard Response LAA-Response-Section 3.6 PUE-01: Utility Conflicts, in Chapter 18, Standard Responses.

Metropolitan's headquarters would not be affected by project construction and operation, because it is west of Los Angeles Union Station, well outside of the northern terminus of the project footprint. Similarly, the Washington Street Pressure Control Structure would not be affected by project construction and operation, because it is east of the Los Angeles River along the Union Pacific Railroad tracks and outside of the project footprint. With respect to the six water conveyance lines cited by Metropolitan, all of these lines are identified in the Los Angeles to Anaheim Project Section Preliminary Engineering for Project Definition (PEPD). The Shared Passenger Track Alternatives would not permanently affect five of the six facilities cited by Metropolitan (Palos Verdes Feeder, Middle Feeder South, Lower Feeder, West Orange County Feeder, and Second Lower Feeder). Volume 3.4 of the PEPD identifies these facilities as being protected in place on the following drawing numbers: Palos Verdes Feeder, UT-C1512; Middle Feeder South, UT-C1534; Lower Feeder, UT-C1563; West Orange County Feeder, UT-C1585; and Second Lower Feeder, UT-C1614. With regard to potential construction impacts on these facilities, as discussed in Section 3.6.6.3, Project Impacts, in Section 3.6, Public Utilities and Energy, of the Draft EIR/EIS, the California High-Speed Rail Authority (Authority)-designated contractor will prepare a technical memorandum documenting how construction activities will be coordinated with utility service providers as project designs progress to minimize or avoid planned and accidental temporary interruptions (PUE-IAMF#4, Utilities and Energy). The memorandum will identify all affected utility service providers (including Metropolitan), proposed coordination activities before and during construction, and the location of all known underground utilities. PUE-IAMF#4 additionally requires that the Authority confirm existing utilities with all utility service providers consistent with the High-Speed Rail (HSR) Design Criteria Manual Section 28.2.2.3.2, Utility Verification Request to Owner. The Authority-designated contractor and each utility service provider will agree on the best ways to coordinate during construction for all planned and accidental interruptions of utility service. Incorporation of PUE-IAMF#4 will minimize potential utility interruptions. With respect to the Orange County Feeder, the PEPD discloses that the portion of the pipeline south of the project alignment would require relocation on Drawing Number UT-C1618. It should be noted that the PEPD incorrectly identifies the Orange County Feeder as a City of Anaheim facility, and was revised in the Final EIR/EIS to correctly present that this is a Metropolitan facility. PUE-IAMF#4 will minimize potential impacts associated with relocation of the Orange County Feeder.

22.7.3 0414

Refer to Standard Response LAA-Response-Section 3.6 PUE-01: Utility Conflicts, in Chapter 18.

The Authority acknowledges the need for Metropolitan to be able to maintain its rights-of-way and access its facilities and properties at all times. The Authority will coordinate with utility owners and local districts and agencies, including Metropolitan's Substructures Team, during development of the final project design to refine the Authority's understanding of the project's potential impacts on existing utility facilities and identify any unaccounted-for utilities and facilities. The Authority will use industry standard practices for addressing local government and utility company facilities and utilities, including designing facility and utility relocations or modifications in accordance with local government entities' or utility companies' applicable design standards in place (usually at the time of agreement

execution or the time of final design). No revisions have been made to the Draft EIR/EIS in response to this comment.

22.7.4 0415

Refer to Standard Response LAA-Response-Section 3.6 PUE-01: Utility Conflicts, in Chapter 18.

The Draft EIR/EIS evaluates the potential for project construction activities to conflict with existing utilities (Impact PU&E-6) and reduce access to existing utilities in the HSR right-of-way (Impact PU&E-7) in Section 3.6.6.3. As discussed under Impact PU&E-6, the Authority would avoid, protect, or relocate potentially affected existing utility infrastructure. As discussed above, Volume 3 of the Draft EIR/EIS identifies the majority of Metropolitan's referenced facilities as being protected in place. Pursuant to Impact PU&E-6, where existing underground utilities cross the HSR right-of-way, the affected utilities would be placed in a protective casing. Additionally, the Authority will incorporate impact avoidance and minimization features (IAMF) to minimize potential utility interruptions including, but not limited to, PUE-IAMF#4, which requires the Authority-designated contractor to prepare a technical memorandum documenting how construction activities will be coordinated with utility service providers as project designs progress to minimize or avoid planned and accidental temporary interruptions. The Draft EIR/EIS concludes that incorporation of IAMFs will prevent adverse conflicts with existing utilities, and mitigation measures are not required. With respect to the potential for reduced access to existing utilities in the HSR right-of-way, as discussed under Impact PU&E-7, maintenance access by utility owners would be maintained through utility districts coordinating with the Authority and scheduling field visits to their facilities within the HSR right-of-way. PUE-IAMF#4 would be incorporated to address utility owners' access needs, thereby preserving access during and after construction. The Draft EIR/EIS concludes that incorporation of IAMFs will prevent adverse conflicts associated with reduced access to existing utilities in the HSR right-of-way, and mitigation measures are not required. Overall, project implementation would avoid potential impacts on Metropolitan's facilities and water infrastructure. Mitigation measures are not required. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.7.5 0416

The Authority acknowledges Metropolitan's enclosed Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California and will coordinate with Metropolitan's Substructures Team as the project design is further developed. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.7.6 0417

The Authority acknowledges Metropolitan's property right requirements and will coordinate with Metropolitan prior to commencing any construction activities within Metropolitan's property. No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013670 DETAIL

Status:	Action Pending
Record Date:	01/14/2026
Interest As:	Other
Full Name:	Alex Hamilton

Stakeholder Comments/Issues:

0365

Hi there Rachel. Alex Hamilton here. Interim Community Development Director for City of Norwalk. I was at the Santa Fe Springs meeting. I think it was last week or the week before. Lost track of time there. I need to get specific copies or access to the specific drawing for the project that are adjacent to Norwalk because I am tasked with updating City Council next Tuesday the 20th because we are going to prepare a comment letter. So, if I can just get directed to the technical studies which I already went to the library here and I saw. The thing is unless I spend a few hours going over those and finding the relevant sections that would be applicable for Norwalk, I feel like it would be easier if you guys could isolate those drawings and send them to me or at least direct them to me, the certain page numbers. Because I want to be able to inform the counsel that this is what's coming and that it's along the Santa Fe Springs side but there still may be some visual impacts associated with the viaduct and the catenary.

22.8 Response to Submission 013670 (Alex Hamilton, City of Norwalk, Jan 14, 2026)

22.8.1 0365

The California High-Speed Rail Authority contacted the commenter on January 14, 2026, 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 #013679 DETAIL

Status:	Action Pending
Record Date:	01/15/2026
Interest As:	Local Agency
Full Name:	Patricia Horsley

Stakeholder Comments/Issues:

Dear Mr. Galvez-Abadia: Attached please find Los Angeles County Sanitation Districts' response to the subject project. Sincerely, Patricia Horsley Environmental Planner | Planning 562-908-4288 ext. 2742 phorsley@lacsd.org

LOS ANGELES COUNTY SANITATION DISTRICTS
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

January 15, 2026

Ref. DOC 7656235

VIA EMAIL Los.Angeles_Anaheim@hsr.ca.gov and Stefan.Galvez@hsr.ca.gov

Mr. Stefan Galvez-Abadia
California High-Speed Rail Authority
355 South Grand Avenue, Suite 2050
Los Angeles, CA 90071

Dear Mr. Galvez-Abadia:

NOA Response to California High-Speed Rail-Los Angeles to Anaheim Project Section

The Los Angeles County Sanitation Districts (LACSD) received a Notice of Availability (NOA) of a Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for the subject project on December 4, 2025. We offer the following comments regarding sewerage service:

1927 1. LACSD owns and maintains approximately 1,400 miles of trunk sewers in Los Angeles County. Please visit https://www.app.lacsd.org/ugutilities/ for a GIS application depicting our sewer system where you can also download copies of our sewer record drawings.

1928 2. In order to determine the potential impact of your project, we plotted the proposed High-Speed Rail (HSR) alignment on an exhibit of our sewer system. As you can see on the attached exhibit and summary table, the project alignment will cross over approximately 20 sewers that we own and maintain. After cross-referencing the affected sewers with the preliminary engineering drawings attached to your DEIR/EIS, it appears the Authority intends to protect in place most of these sewers. However, for several sewers, there is no mention of what the Authority anticipates the impact will be. Additionally, one of our sewers is marked "relocate".

3. Based on the above potentially significant impacts to our sewers, we request that the Authority contact Mr. Mathew Watson, Supervising Engineer in our Sewer Design Section, at mathewwatson@lacsd.org or (562) 908-4288, ext. 1620, to initiate discussions about the impact of the project on our sewers and our requirements for protecting in place or relocating a sewer, which may also require the Authority to execute a Buildover Agreement or Sewer Relocation Agreement that LACSD will prepare.

4. LACSD offers the following specific comments on the DEIR/EIS and on the preliminary engineering drawings attached to the DEIR/EIS:

1929 a. **Table 3.6-3 Summary of Utility and Energy Providers within the Resources Study Area**, sewer or wastewater utility type, page 3.6-24 of the DEIR/EIS. Please add the Los Angeles County Sanitation Districts as a sewer service provider.

1930 b. **Drawing Number UT-C1522**. The storm drain does not belong to LACSD.

1931

c. **Drawing Numbers UT-C1521, UT-C1522, UT-C1523, UT-C1529, UT-C1530, UT-C1531 (Nos 72 and 74), UT-C1534, UT-C1535, UT-C1536, and UT-C1558**, sewers indicated on these drawings do not belong to LACSD. Those sewers are owned by the local jurisdiction (i.e., the local city or the Los Angeles County Department of Public Works if in an unincorporated County area).

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2742, or phorsley@lacsd.org.

Very truly yours,

Patricia Horsley

Patricia Horsley
Environmental Planner
Facilities Planning Department

PLH:plh

Attachments: 1. Exhibit of LACSD sewer system with HSR project alignment
2. Table of LACSD sewers that will be impacted
3. Project drawing sheets that incorrectly identify sewers as LACSD owned

cc: M. Watson

SAN JOSE CREEK WRP

JOINT ADMINISTRATION OFFICE

WHITTIER NARROWS WRP

PUENTE HILLS IMF

PUENTE HILLS FIELD OFFICE

PUENTE HILLS LANDFILL

PUENTE HILLS MR/TS

SOUTH GATE TS

DART

COMPTON FIELD OFFICE

LOS COYOTES WRP

LOS ANGELES COUNTY SANITATION DISTRICTS

Converting Waste Into Resources

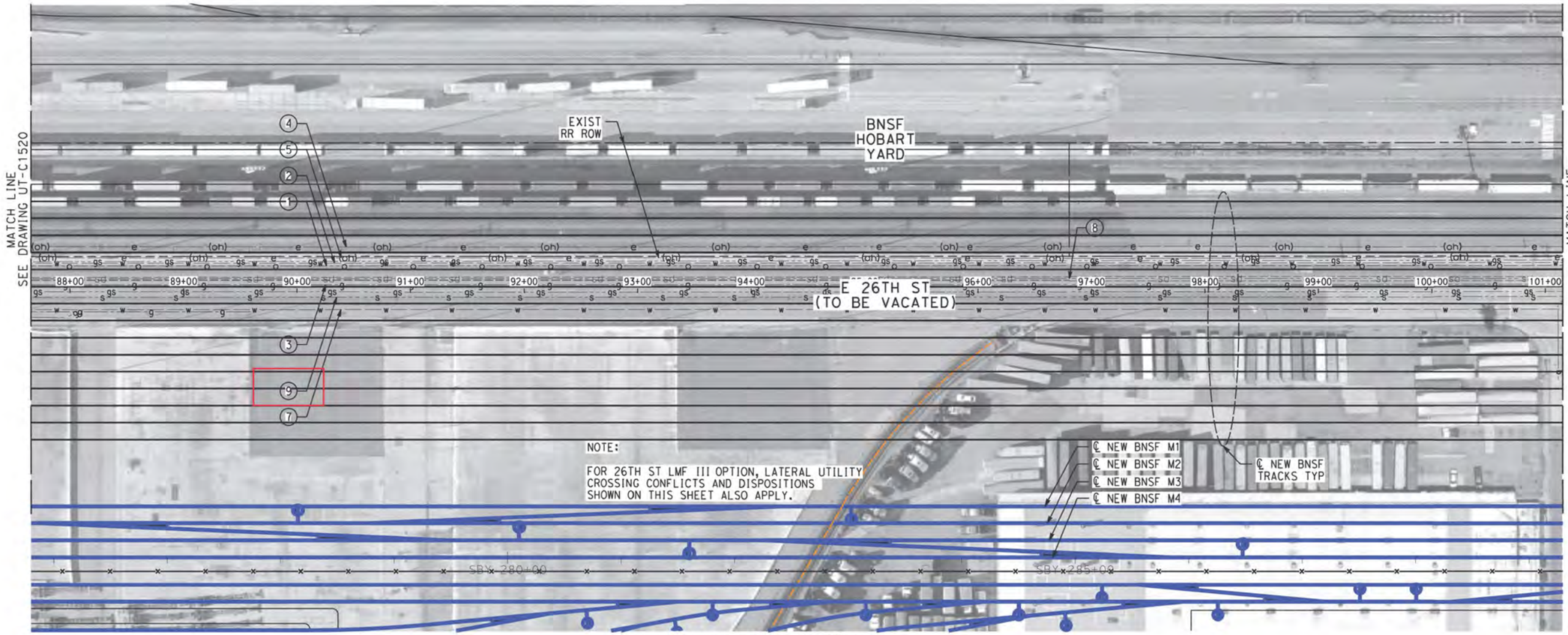
- LACSD Sewer
- Proposed California High-Speed Rail Alignment
- LACSD Facilities
- LACSD Service Area
- LACSD Pumping Plant

0 0.5 1 2 3

Miles

N

1932



MAJOR UTILITY CONFLICTS

No.	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
①	OIL	8" (ABAND)	STA SBY 275+50 TO STA SBY 289+00	EXXON MOBIL	REMOVE INTERFERING PORTIONS
②	WATER	UNKNOWN	STA SBY 275+50 TO STA SBY 289+00	CITY OF VERNON	REMOVE INTERFERING PORTIONS
③	GAS	8"	STA SBY 275+50 TO STA SBY 289+00	SCG	RELOCATE
④	ELECTRIC	66 KV	STA SBY 275+50 TO STA SBY 289+00	SCE	RELOCATE
⑤	ELECTRIC	OCS	STA SBY 275+50 TO STA SBY 289+00	CITY OF VERNON	RELOCATE
⑥	GAS	4"	STA SBY 275+50 TO STA SBY 280+00	SO. CA. GAS CO.	-
⑦	WATER	10"	STA SBY 275+50 TO STA SBY 289+00	CA. WATER SERVICE	-
⑧	STORM DRAIN	UNKNOWN	STA SBY 275+50 TO STA SBY 289+00	-	RELOCATE
⑨	SEWER	UNKNOWN	STA SBY 275+50 TO STA SBY 280+00	LACSD	RELOCATE

City of Vernon, not LACSD

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50 0 50 100
1"=50'
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DESIGNED BY C. HUANG
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CHECKED BY A. BOSCH
IN CHARGE J. SWANSON
DATE 09/29/25 ~~02/28/25~~

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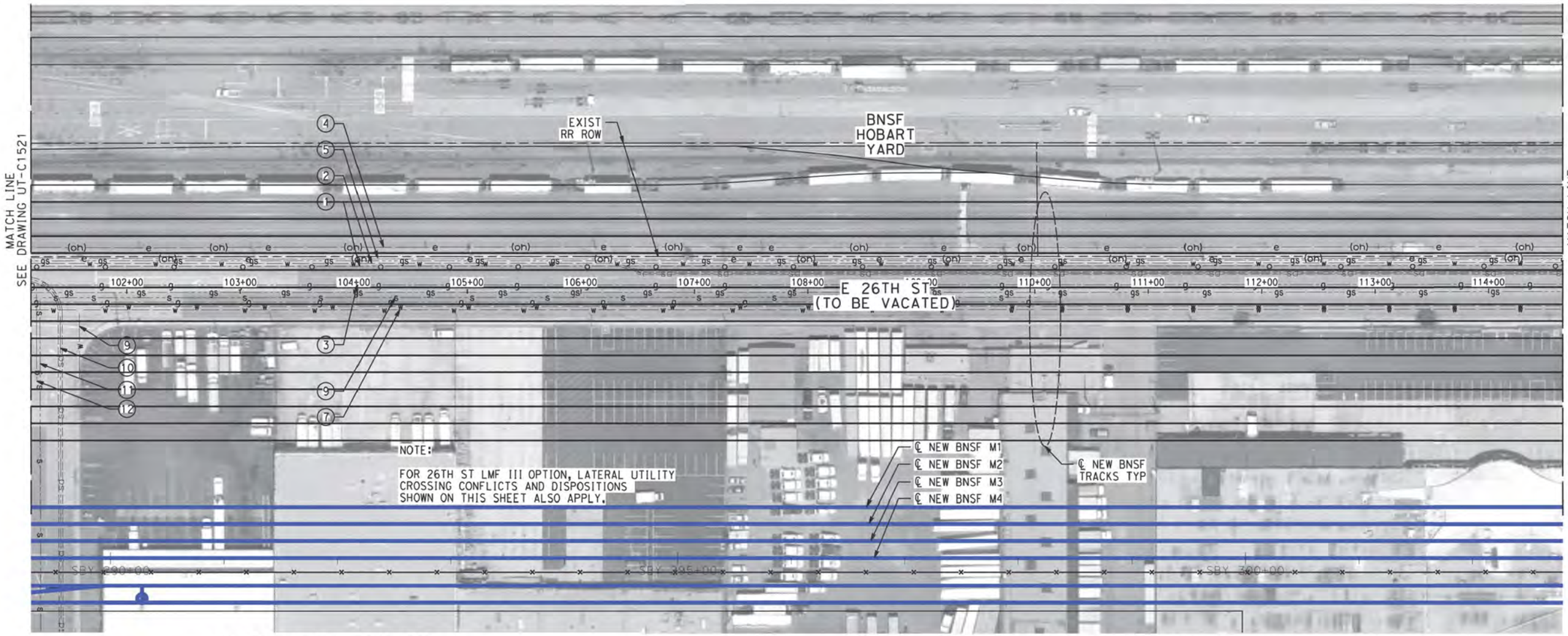
CALIFORNIA HIGH-SPEED RAIL AUTHORITY

CALIFORNIA HIGH-SPEED TRAIN PROJECT
LOS ANGELES TO ANAHEIM
RECORD SET
PRELIMINARY ENGINEERING FOR PROJECT DEFINITION
EXISTING COMPOSITE UTILITIES PLAN
STA SBY 275+50 TO STA SBY 289+00

CONTRACT NO. HSR06-0005
DRAWING NO. UT-C1521
SCALE 1" = 50'
SHEET NO.

$PLOT$

1933



MAJOR UTILITY CONFLICTS

No.	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
①	OIL	8" (ABAND)	STA SBY 289+00 TO STA SBY 302+50	EXXON MOBIL	REMOVE INTERFERING PORTIONS
②	WATER	UNKNOWN	STA SBY 289+00 TO STA SBY 302+50	CITY OF VERNON	REMOVE INTERFERING PORTIONS
③	GAS	8"	STA SBY 289+00 TO STA SBY 302+50	SCG	RELOCATE
④	ELECTRIC	66 KV	STA SBY 289+00 TO STA SBY 302+50	SCE	RELOCATE
⑤	ELECTRIC	OCS	STA SBY 289+00 TO STA SBY 302+50	CITY OF VERNON	RELOCATE
⑥	GAS	4"	STA SBY 301+05 TO STA SBY 302+50	SO. CA. GAS CO.	-
⑦	WATER	10"	STA SBY 301+05 TO STA SBY 302+50	CA. WATER SERVICE	-
⑧	STORM DRAIN	UNKNOWN	STA SBY 301+05 TO STA SBY 302+50	-	RELOCATE
⑨	WATER	8"	STA SBY 285+50	CITY OF VERNON	RELOCATE

MAJOR UTILITY CONFLICTS

No.	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
⑩	STORM DRAIN	UNKNOWN	STA SBY 285+50	LACSD	RELOCATE
⑪	SEWER	UNKNOWN	STA SBY 285+50	LACSD	RELOCATE
⑫	GAS	8"	STA SBY 285+50	SCG	RELOCATE

#10 - Storm drain doesn't belongs to LACSD
#11 - City of Vernon, not LACSD

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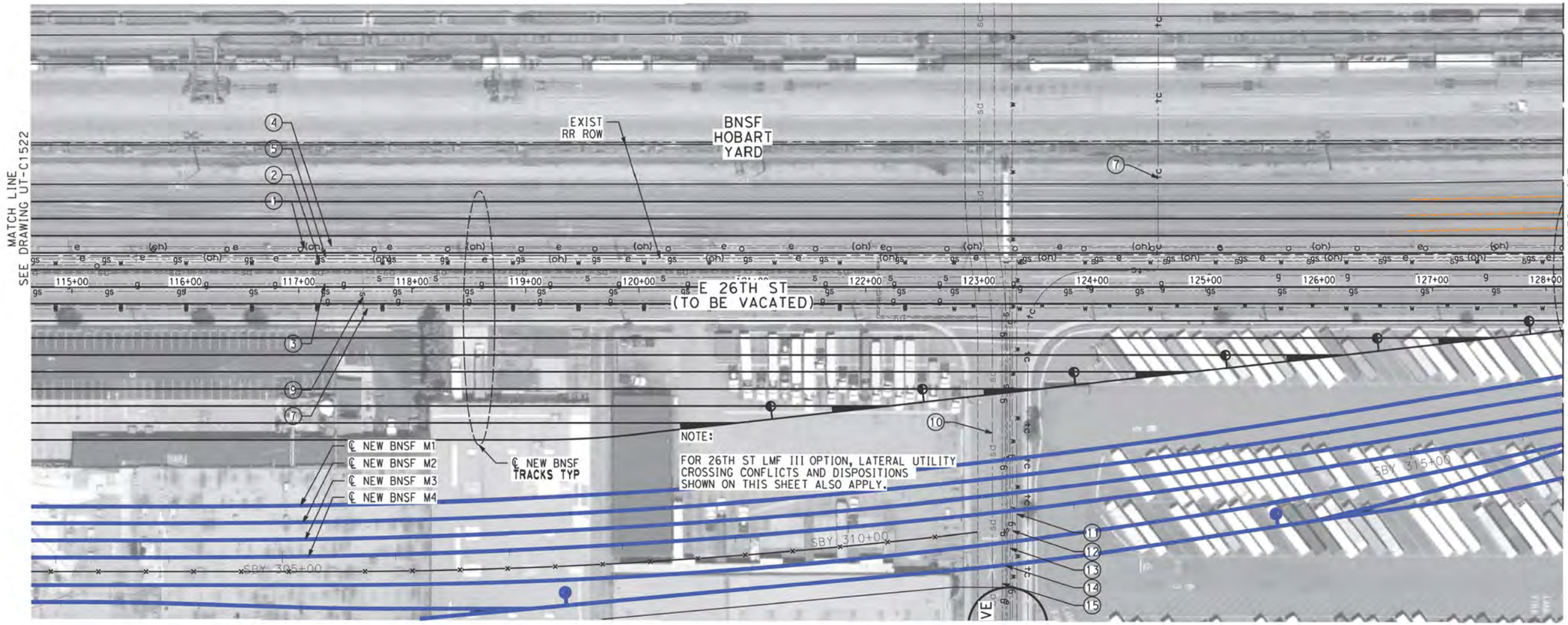
CALIFORNIA HIGH-SPEED RAIL AUTHORITY

CALIFORNIA HIGH-SPEED TRAIN PROJECT
LOS ANGELES TO ANAHEIM
RECORD SET
PRELIMINARY ENGINEERING FOR PROJECT DEFINITION
EXISTING COMPOSITE UTILITIES PLAN
STA SBY 289+00 TO STA SBY 302+50

CONTRACT NO. HSR06-0005
DRAWING NO. UT-C1522
SCALE 1" = 50'
SHEET NO.

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1934



MAJOR UTILITY CONFLICTS

No.	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
①	OIL	8" (ABAND)	STA SBY 301+50 TO STA SBY 316+50	EXXON MOBIL	REMOVE INTERFERING PORTIONS
②	WATER	UNKNOWN	STA SBY 301+50 TO STA SBY 316+50	CITY OF VERNON	REMOVE INTERFERING PORTIONS
③	GAS	8"	STA SBY 301+50 TO STA SBY 316+50	SCG	RELOCATE
④	ELECTRIC	66 KV	STA SBY 301+50 TO STA SBY 316+50	SCE	RELOCATE
⑤	ELECTRIC	OCS	STA SBY 301+50 TO STA SBY 316+50	CITY OF VERNON	RELOCATE
⑥	GAS	4"	STA SBY 301+50 TO STA SBY 316+50	SO. CA. GAS CO.	-
⑦	WATER	10"	STA SBY 301+50 TO STA SBY 316+50	CA. WATER SERVICE	-
⑧	STORM DRAIN	UNKNOWN	STA SBY 301+50 TO STA SBY 316+50	-	RELOCATE
⑨	SEWER	UNKNOWN	STA SBY 301+50 TO STA SBY 316+50	LACSD	RELOCATE

MAJOR UTILITY CONFLICTS

No.	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
⑩	STORM DRAIN	10'X9' RCB	STA SBY 311+00	LACFCD	PROTECT-IN-PLACE
⑪	WATER	12"	STA SBY 311+50	C.S.W	PROTECT-IN-PLACE
⑫	WATER	12"	STA SBY 311+50	C.S.W	PROTECT-IN-PLACE
⑬	GAS	4"	STA SBY 311+50	SCG	PROTECT-IN-PLACE
⑭	SEWER	UNKNOWN	STA SBY 311+50	LACFCD	PROTECT-IN-PLACE
⑮	GAS	4"	STA SBY 311+50	SCG	PROTECT-IN-PLACE

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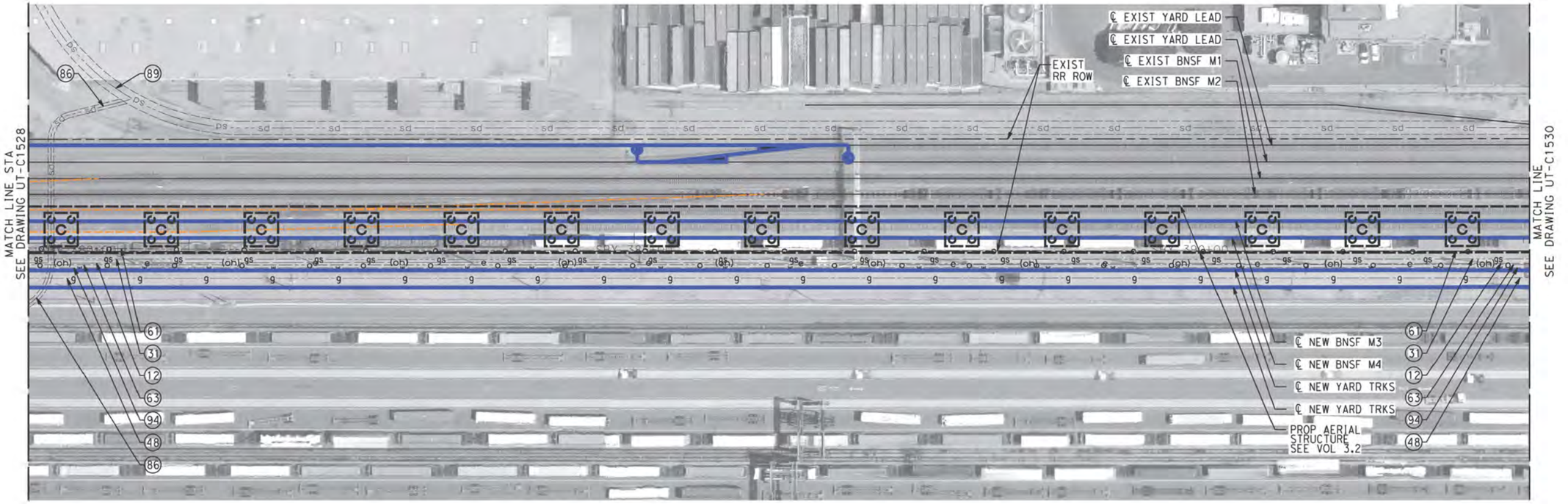
CALIFORNIA HIGH-SPEED RAIL AUTHORITY

CALIFORNIA HIGH-SPEED TRAIN PROJECT
LOS ANGELES TO ANAHEIM
RECORD SET
PRELIMINARY ENGINEERING FOR PROJECT DEFINITION
EXISTING COMPOSITE UTILITIES PLAN
STA SBY 302+50 TO STA SBY 316+00

CONTRACT NO. HSR06-0005
DRAWING NO. UT-C1523
SCALE 1" = 50'
SHEET NO.

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1935



MAJOR UTILITY CONFLICTS

No.	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
(12)	ELECTRIC	66KV (OH)	STA SBY 379+50 TO STA SBY 393+00	SCE	RELOCATE
(31)	GASOLINE	6" (ABANDONED)	STA SBY 379+50 TO STA SBY 393+00	CRIMSON	RELOCATE
(48)	GAS	26" HP	STA SBY 379+50 TO STA SBY 393+00	SCG	RELOCATE
(61)	OIL	8" (ABANDONED)	STA SBY 379+50 TO STA SBY 393+00	EXXON MOBIL	RELOCATE
(63)	OIL	8"	STA SBY 379+50 TO STA SBY 393+00	EXXON MOBIL	RELOCATE
(72)	SEWER	12"	STA SBY 401+48 TO STA SBY 413+62	LACSD	PROTECT IN PLACE
(86)	STORM DRAIN	63" RCP	STA SBY 378+95 TO STA SBY 379+95	LACFCD	RELOCATE
(88)	STORM DRAIN	78" RCP	STA SBY 400+62 TO STA SBY 405+42	LACFCD	PROTECT IN PLACE
(89)	STORM DRAIN	15'Wx9'H RCB	STA SBY 379+50 TO STA SBY 405+42	LACFCD	PROTECT IN PLACE
(94)	WATER	10"	STA SBY 372+83 TO STA SBY 424+00	MWD	RELOCATE

Could not locate #72 in this drawing

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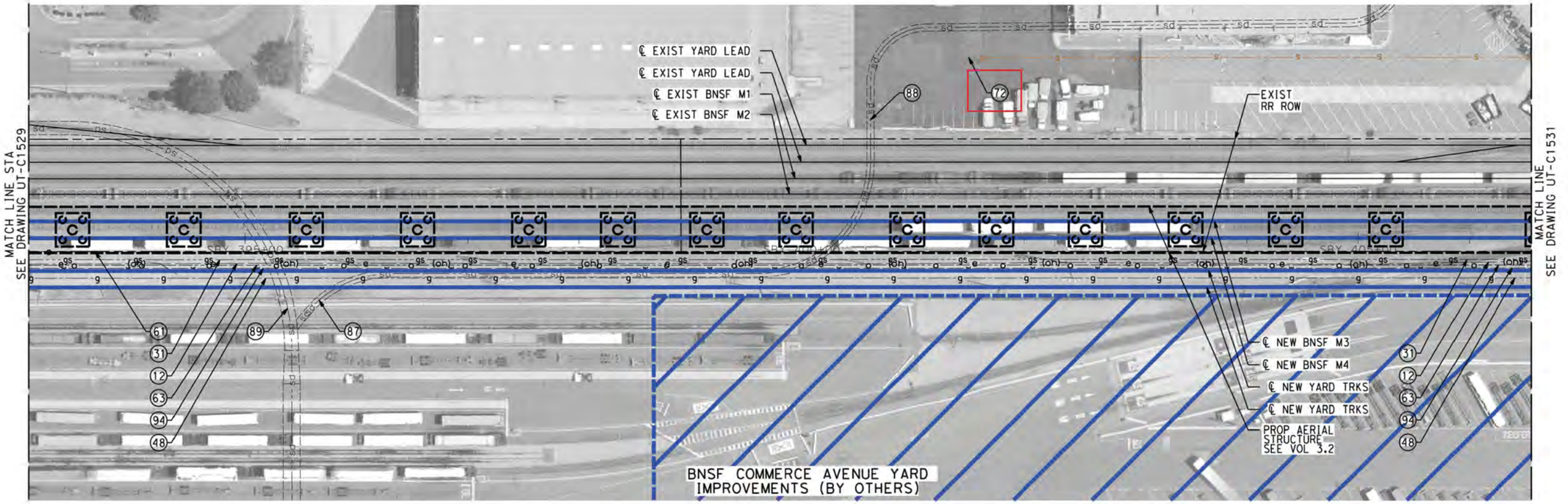
CALIFORNIA HIGH-SPEED RAIL AUTHORITY

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STA SBY 379+50 TO STA SBY 393+00

CONTRACT NO. HSR06-0005
DRAWING NO. UT-C1529
SCALE 1" = 50'
SHEET NO.

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1936



MAJOR UTILITY CONFLICTS

No.	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
(12)	ELECTRIC	66KV (OH)	STA SBY 393+00 TO STA SBY 406+50	SCE	RELOCATE
(31)	GASOLINE	6" (ABANDONED)	STA SBY 393+00 TO STA SBY 406+50	CRIMSON	RELOCATE
(48)	GAS	26" HP	STA SBY 371+31 TO STA SBY 424+00	SCG	RELOCATE
(61)	OIL	8" (ABANDONED)	STA SBY 393+00 TO STA SBY 393+63	EXXON MOBIL	RELOCATE
(63)	OIL	8"	STA SBY 393+00 TO STA SBY 406+50	EXXON MOBIL	RELOCATE
(72)	SEWER	12"	STA SBY 401+48 TO STA SBY 413+62	LACSD	PROTECT IN PLACE
(88)	STORM DRAIN	78" RCP	STA SBY 400+62 TO STA SBY 405+42	LACFCD	PROTECT IN PLACE
(89)	STORM DRAIN	15'Wx9'H RCB	STA SBY 379+50 TO STA SBY 405+42	LACFCD	PROTECT IN PLACE
(94)	WATER	10"	STA SBY 372+83 TO STA SBY 424+00	MWD	RELOCATE

Not LACSD

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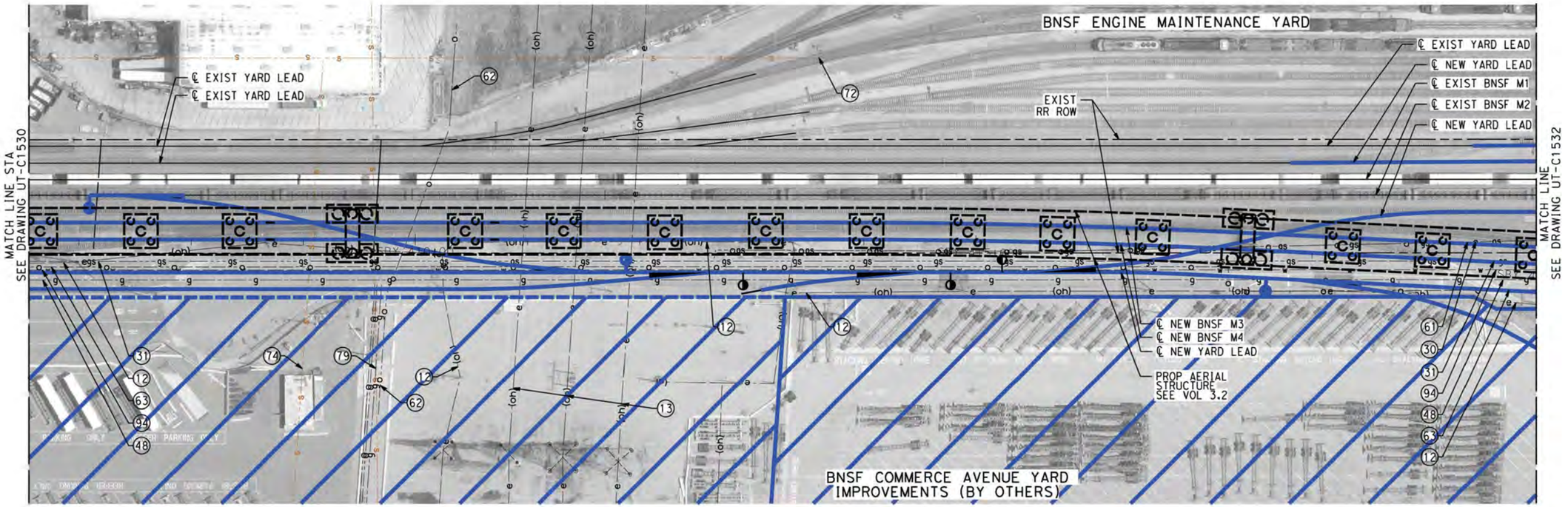
CALIFORNIA HIGH-SPEED RAIL AUTHORITY

CALIFORNIA HIGH-SPEED TRAIN PROJECT
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RECORD SET
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EXISTING COMPOSITE UTILITIES PLAN
STA SBY 393+00 TO STA SBY 406+50

CONTRACT NO. HSR06-0005
DRAWING NO. UT-C1530
SCALE 1" = 50'
SHEET NO.

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1937



MAJOR UTILITY CONFLICTS

No.	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
(12)	ELECTRIC	66KV (OH)	STA SBY 406+50 TO STA SBY 420+00	SCE	RELOCATE
(13)	ELECTRIC	220KV (OH)	STA SBY 410+96	SCE	RELOCATE
(13)	ELECTRIC	220KV (OH)	STA SBY 411+45	SCE	RELOCATE
(13)	ELECTRIC	220KV (OH)	STA SBY 411+93	SCE	RELOCATE
(30)	GASOLINE	3" (ABANDONED)	STA SBY 412+68 TO STA SBY 420+00	CRIMSON	RELOCATE
(31)	GASOLINE	6" (ABANDONED)	STA SBY 406+50 TO STA SBY 420+00	CRIMSON	RELOCATE
(48)	GAS	26" HP	STA SBY 371+31 TO STA SBY 424+00	SCG	RELOCATE
(61)	OIL	8" (ABANDONED)	STA SBY 406+50 TO STA SBY 420+00	EXXON MOBIL	RELOCATE
(62)	OIL	8", 6", 6"	STA SBY 409+60	CHEVRON/CRIMSON	RELOCATE
(63)	OIL	8"	STA SBY 406+50 TO STA SBY 420+00	EXXON MOBIL	RELOCATE
(72)	SEWER	12"	STA SBY 401+48 TO STA SBY 413+62	LACSD	PROTECT IN PLACE
(74)	SEWER	21"	STA SBY 409+07	LACSD	PROTECT IN PLACE
(79)	SEWER	54"	STA SBY 409+64	LACSD	PROTECT IN PLACE

#72 and #74 are not LACSD

D2 Interceptor Trunk

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1"=50'
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DESIGNED BY C. HUANG
DRAWN BY C. HUANGE
CHECKED BY A. BOSCH
IN CHARGE J. SWANSON
DATE 02/28/25 ~~09/29/25~~

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stv

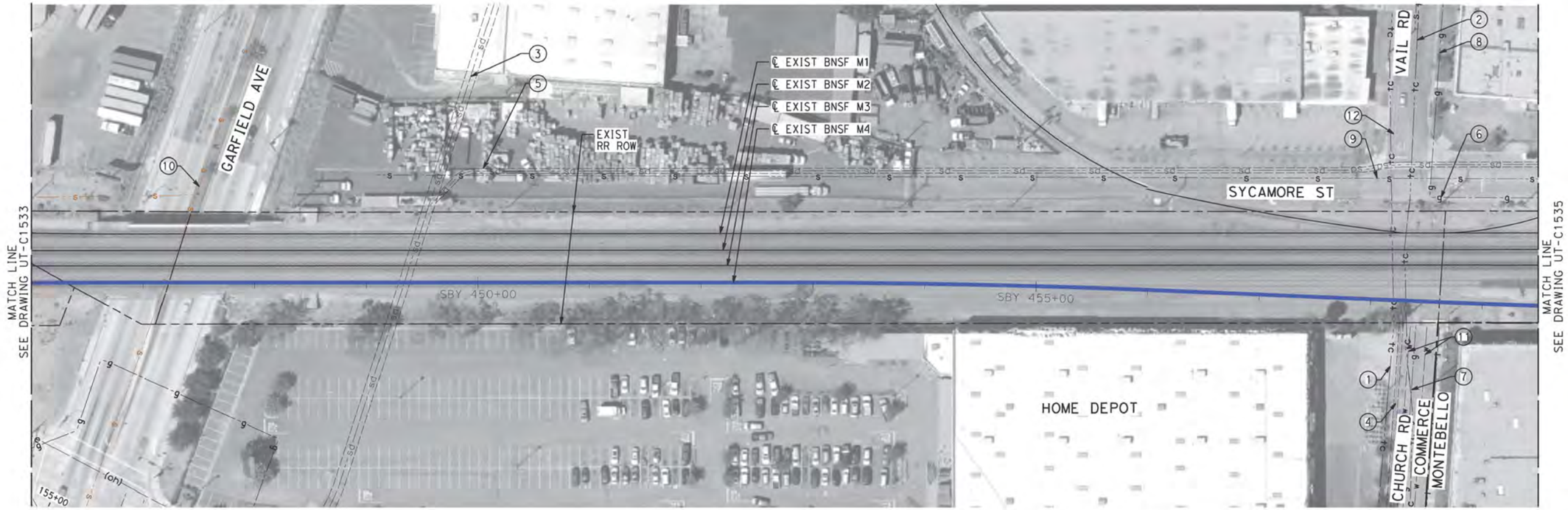
CALIFORNIA HIGH-SPEED RAIL AUTHORITY

CALIFORNIA HIGH-SPEED TRAIN PROJECT
LOS ANGELES TO ANAHEIM
RECORD SET
PRELIMINARY ENGINEERING FOR PROJECT DEFINITION
EXISTING COMPOSITE UTILITIES PLAN
STA SBY 406+50 TO STA SBY 420+00

CONTRACT NO. HSR06-0005
DRAWING NO. UT-C1531
SCALE 1" = 50'
SHEET NO.

$PLOT$

1938



MAJOR UTILITY CONFLICTS

NO	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
①	COMMUNICATION	TELECOM	VAIL RD	SBC	PROTECT IN PLACE
②	COMMUNICATION	TELECOM	VAIL RD	SBC	PROTECT IN PLACE
③	STORM DRAIN	9.75'X13'	STA SBY 449+34	LACFCD	PROTECT IN PLACE
④	STORM DRAIN	42" RCP	CHURCH RD	LACFCD	PROTECT IN PLACE
⑤	STORM DRAIN	54" RCP	STA SBY 449+55~ STA SBY 459+50	LACFCD	PROTECT IN PLACE
⑥	GAS	6"	SYCAMORE ST	SCG	PROTECT IN PLACE
⑦	GAS	8"	CHURCH RD	SCG	PROTECT IN PLACE
⑧	GAS	10"	VAIL RD	SCG	PROTECT IN PLACE
⑨	SEWER	10" VCP	SYCAMORE ST	LACSD	PROTECT IN PLACE
⑩	SEWER	18" VCP	GARFIELD AVE	LACSD	PROTECT IN PLACE
⑪	WATER	12"	CHURCH RD	CITY	PROTECT IN PLACE
⑫	WATER	72"	VAIL RD	MWD	PROTECT IN PLACE

City of Montebello, not LACSD

Montebello Trunk

NOT FOR CONSTRUCTION
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50 0 50 100
1"=50'
SCALE APPLICABLE FOR FULL SIZE ONLY

REV	DATE	BY	CHK	APP	DESCRIPTION

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DATE 02/28/25

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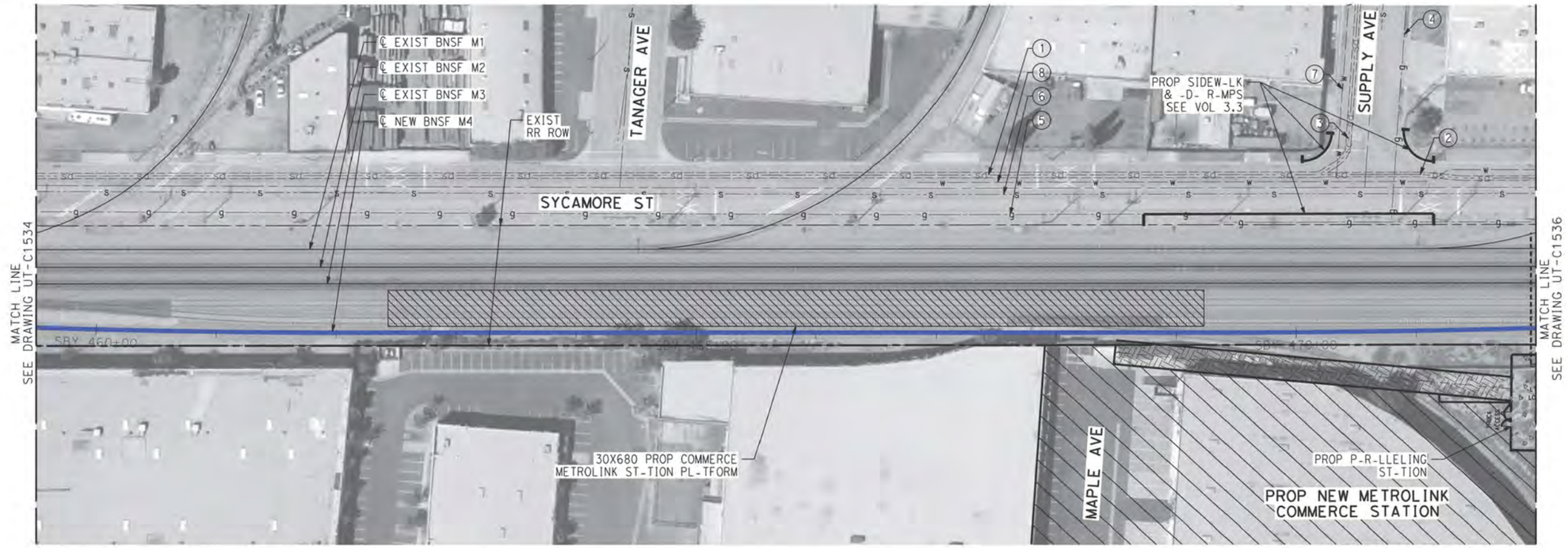
CALIFORNIA HIGH-SPEED RAIL AUTHORITY

CALIFORNIA HIGH-SPEED TRAIN PROJECT
LOS ANGELES TO ANAHEIM
RECORD SET
PRELIMINARY ENGINEERING FOR PROJECT DEFINITION
EXISTING COMPOSITE UTILITIES PLAN
STA SBY 446+00 TO STA SBY 459+50

CONTRACT NO. HSR06-0005
DRAWING NO. UT-C1534
SCALE 1" = 50'
SHEET NO.

$PLOT$

1939



MAJOR UTILITY CONFLICTS

NO	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
①	STORM DRAIN	54" RCP	SYCAMORE ST	LACFCD	PROTECT IN PLACE
②	STORM DRAIN	45" RCP	SYCAMORE ST	LACFCD	PROTECT IN PLACE
③	STORM DRAIN	51" RCP	SUPPLY AVE	LACFCD	PROTECT IN PLACE
④	GAS	3"	SUPPLY AVE	SCG	PROTECT IN PLACE
⑤	GAS	6"	SYCAMORE ST	SCG	PROTECT IN PLACE
⑥	SEWER	10"	SYCAMORE ST	LACSD	PROTECT IN PLACE
⑦	WATER	8"	SUPPLY AVE	SOUTH MONTEBELLO I.D.	PROTECT IN PLACE
⑧	WATER	12"	SYCAMORE ST	SOUTH MONTEBELLO I.D.	PROTECT IN PLACE
⑨	SEWER	UNKNOWN	TANAGER AVE	LACFCD	PROTECT IN PLACE

City of Montebello, not LACSD

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FOR INTERNAL USE ONLY

50 0 50 100
1"=50'
SC-LE -PPLIC-BLE FOR FULL SIZE ONLY

REV	D-TE	BY	CHK	-PP	DESCRIPTION

DESIGNED BY C. HU-NG
DR-WN BY C. HU-NGE
CHECKED BY -. BOSCH
IN CH-RGE J. SW-NSON
D-TE 02/28/25 ~~02/20/25~~

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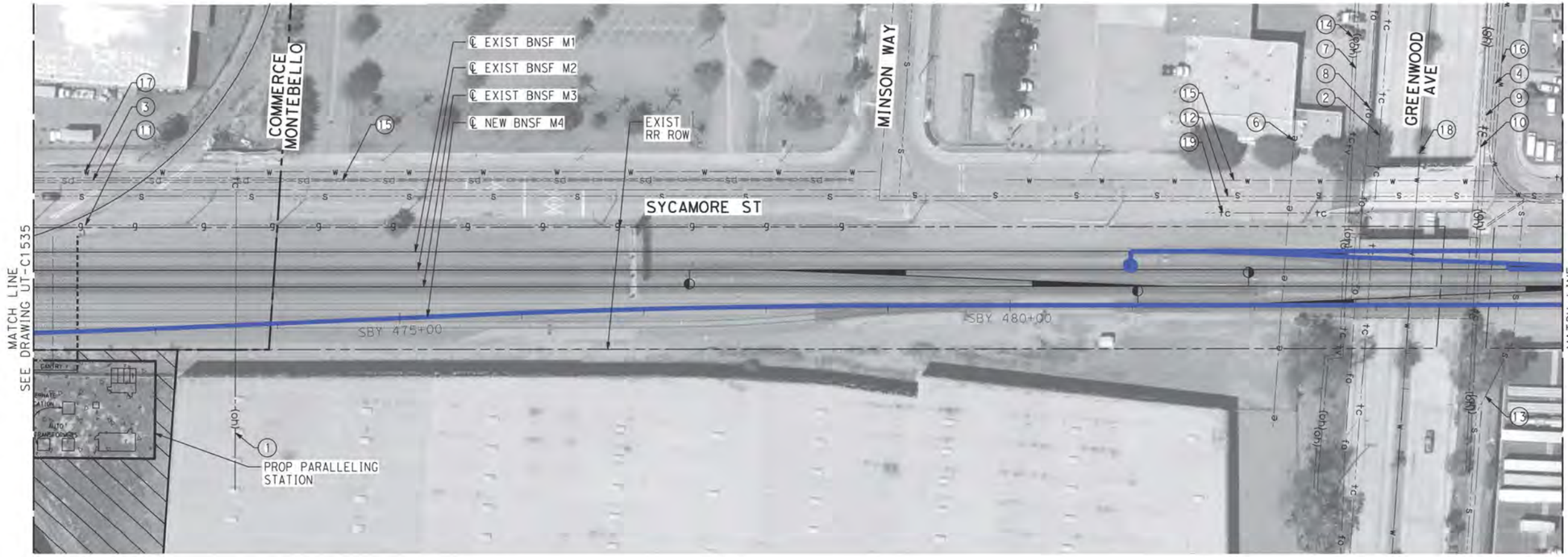
CALIFORNIA HIGH-SPEED RAIL AUTHORITY

CALIFORNIA HIGH-SPEED TRAIN PROJECT
LOS ANGELES TO ANAHEIM
RECORD SET
PRELIMINARY ENGINEERING FOR PROJECT DEFINITION
EXISTING COMPOSITE UTILITIES PLAN
STA SBY 459+50 TO STA SBY 472+00

CONTR-CT NO. HSR06-0005
DRAWING NO. UT-C1535
SCALE 1" = 50'
SHEET NO.

$PLOT$

1940



MAJOR UTILITY CONFLICTS

NO	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
①	COMMUNICATION	TELECOM OH	STA SBY 473+66	AT&T	PROTECT IN PLACE
②	COMMUNICATION	TELECOM 3 DU	STA SBY 482+93 / GREENWOOD AVE	AT&T LOCAL	PROTECT IN PLACE
③	STORM DRAIN	45" RCP	SYCAMORE ST	LACFCD	PROTECT IN PLACE
④	STORM DRAIN	33" RCP	GREENWOOD AVE	LACFCD	PROTECT IN PLACE
⑤	NOT USED				
⑥	ELECTRIC	CONDUIT (UG)	STA SBY 482+20	SCE	PROTECT IN PLACE
⑦	COMMUNICATION	FIBER OPTIC OH	STA SBY 482+75 / GREENWOOD AVE	VERIZON WIRELESS	PROTECT IN PLACE
⑧	COMMUNICATION	FIBER OPTIC UG	STA SBY 482+83 / GREENWOOD AVE	VERIZON WIRELESS	PROTECT IN PLACE
⑨	COMMUNICATION	FIBER OPTIC OH	STA SBY 483+80 / GREENWOOD AVE	AT&T	PROTECT IN PLACE
⑩	COMMUNICATION	FIBER OPTIC OH	STA SBY 483+84 / GREENWOOD AVE	AT&T	PROTECT IN PLACE
⑪	GAS	6"	SYCAMORE ST	SCG	PROTECT IN PLACE

MAJOR UTILITY CONFLICTS

City of Montebello, not LACSD

NO	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
⑫	SEWER	UNKNOWN	PEERLESS WAY	LACSD	PROTECT IN PLACE
⑬	NOT USED				
⑭	TELEVISION	CABLE TV (OH)	STA SBY 482+72 / GREENWOOD AVE	CHARTER	PROTECT IN PLACE
⑮	WATER	6"	SYCAMORE ST	SOUTH MONTEBELLO I.D.	PROTECT IN PLACE
⑯	WATER	6"	GREENWOOD AVE	SOUTH MONTEBELLO I.D.	PROTECT IN PLACE
⑰	WATER	12"	SYCAMORE ST	SOUTH MONTEBELLO I.D.	PROTECT IN PLACE
⑱	WATER	12"	GREENWOOD AVE	SGVWC	PROTECT IN PLACE
⑲	COMMUNICATION	UNKNOWN	SYCAMORE ST	AT&T	PROTECT IN PLACE

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1"=50'
SCALE APPLICABLE FOR FULL SIZE ONLY

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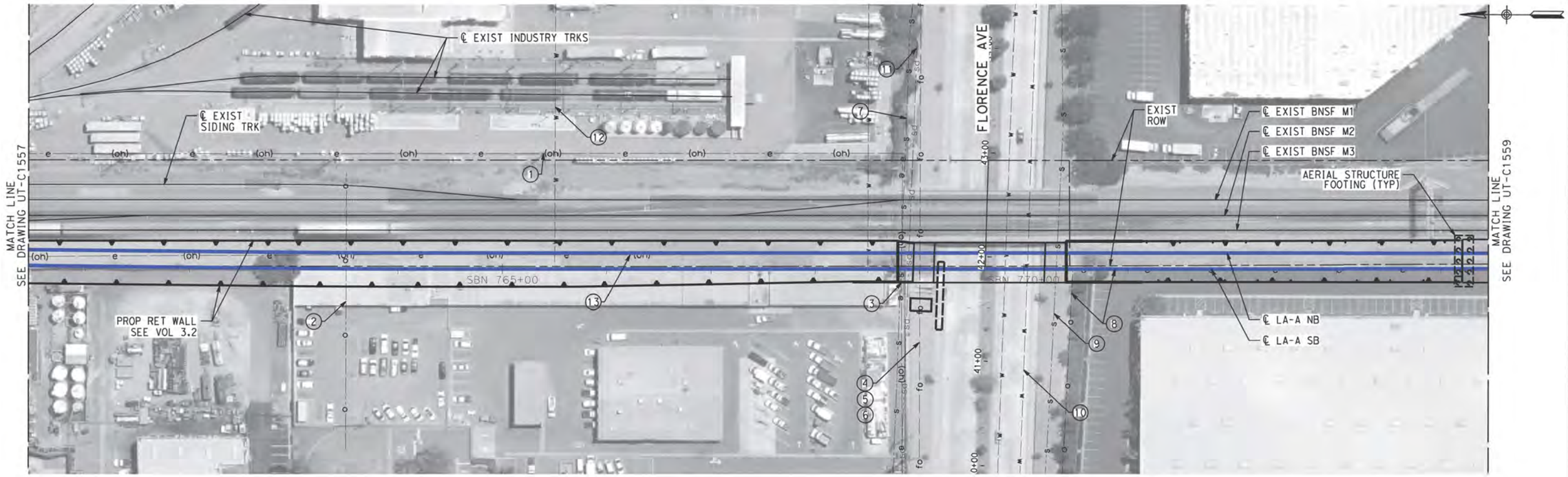
CALIFORNIA HIGH-SPEED RAIL AUTHORITY

CALIFORNIA HIGH-SPEED TRAIN PROJECT
LOS ANGELES TO ANAHEIM
RECORD SET
PRELIMINARY ENGINEERING FOR PROJECT DEFINITION
EXISTING COMPOSITE UTILITIES PLAN
STA SBY 472+00 TO STA SBY 484+50

CONTRACT NO. HSR06-0005
DRAWING NO. UT-C1536
SCALE 1" = 50'
SHEET NO.

$PLOTS

1941



MAJOR UTILITY CONFLICTS

No.	TYPE OF UTILITY	SIZE / MATERIAL	LOCATION	OWNER	DISPOSITION
①	ELECTRIC	66kV (OH)	STA SBN 760+00 TO STA SBN 768+80	SCE	PROTECT-IN-PLACE
②	OIL	3"	STA SBN 763+50	EXXON MOBIL	PROTECT-IN-PLACE
③	ELECTRIC	66kV (OH)	STA SBN 768+80	SCE	RELOCATE
④	COMMUNICATION	FIBER OPTIC (OH)	STA SBN 769+00	VERIZON WIRELESS	PROTECT-IN-PLACE
⑤	COMMUNICATION	FIBER OPTIC (OH)	STA SBN 769+00	AT&T - TCA	PROTECT-IN-PLACE
⑥	COMMUNICATION	48-STRAND FIBER OPRIC (UG)	STA SBN 769+00	VERIZON WIRELESS	PROTECT-IN-PLACE
⑦	SEWER	8" VCP (WITH 20" x 11/32" STEEL CASING)	STA SBN 768+80	LACSD	RELOCATE
⑧	OIL	8"	STA SBN 770+50 TO STA SBN 774+00	CRIMSON	RELOCATE
⑨	SEWER	15" VCP (WITH 42" x 3/16" STEEL CASING)	STA SBN 770+40	CITY OF SANTA FE SPRINGS	PROTECT-IN-PLACE
⑩	WATER	12" ACP (WITH 24" x 7/16" STEEL CASING)	STA SBN 770+00	CITY OF SANTA FE SPRINGS	RELOCATE
⑪	STORM DRAIN	63" RCP	STA SBN 768+80	CITY OF SANTA FE SPRINGS	RELOCATE
⑫	WATER	UNKNOWN	STA SBN 765+50	CITY OF SANTA FE SPRINGS	PROTECT-IN-PLACE
⑬	ELECTRIC	OH	STA SBN 760+00 TO STA SBN 766+90	SCE	RELOCATE
⑭	WATER	UNKNOWN	STA SBN 769+90	CITY OF SANTA FE SPRINGS	PROTECT-IN-PLACE

CSMD, not LACSD

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50 0 50 100
1"=50'
SCALE APPLICABLE FOR FULL SIZE ONLY

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CALIFORNIA HIGH-SPEED RAIL AUTHORITY

CALIFORNIA HIGH-SPEED TRAIN PROJECT
LOS ANGELES TO ANAHEIM
RECORD SET
PRELIMINARY ENGINEERING FOR PROJECT DEFINITION
EXISTING COMPOSITE UTILITIES PLAN
STA SBN 760+50 TO STA SBN 774+50

CONTRACT NO. HSR06-0005
DRAWING NO. UT-C1558
SCALE 1" = 50'
SHEET NO.

#PLOT#

1942

Sewer Name	Drawing Number	Relocate/Protect in Place
DISTRICT #2 INTERCEPTOR TRUNK	UT-C1531	Protect in Place
DISTRICT #2 MAIN TRUNK	UT-C1528	Protect in Place
DOWNEY-BELLFLOWER RELIEF TRUNK, SECTION 2	UT-C1543	Protect in Place
DOWNEY-BELLFLOWER TRUNK	UT-C1544	Protect in Place
FLORENCE AVENUE TRUNK	UT-C1557	Protect in Place
JOA-1A SAN JOSE CREEK WRP OUTFALL	UT-C1546	Protect in Place
JOINT OUTFALL B - UNIT 1C	UT-C1540	Protect in Place
JOINT OUTFALL B - UNIT 1C REPLACEMENT	UT-C1539	Protect in Place
JOINT OUTFALL H - UNIT 3	UT-C1540	Protect in Place
LA MIRADA RELIEF TRUNK	UT-C1571, 1573	Protect in Place
LA MIRADA TRUNK, SECTS 1&2	UT-C1570	No mention
MONTEBELLO RELIEF TRUNK, SECTION 3	UT-C1534	Protect in Place
MONTEBELLO TRUNK	UT-C1533	Protect in Place
ORR AND DAY ROAD TRUNK	UT-C1549	Protect in Place
SHOEMAKER AVENUE TRUNK	UT-C1567	Relocate
SO WHITTIER OUTFALL & SO WHTTR OUTFL RLF RELOC	Between UT-C1567 and C1570	No mention
SO WHITTIER OUTFALL RLF TR, SECTS 1,2A,2B,2C,&3		
SO WHITTIER OUTFALL TR, SECTS 1,2,3,&4		

22.9 Response to Submission 013679 (Patricia Horsley, Los Angeles County Sanitation Districts, Jan 15, 2026)

22.9.1 1927

The California High-Speed Rail Authority (Authority) acknowledges that the Los Angeles County Sanitation District (LACSD) owns and maintains 1,400 miles of trunk sewers in Los Angeles County and that a geographic information system application is available for viewing. This information has been noted for the record. The Authority did not use this database, but rather developed the design based on as-built information received from LACSD at the initiation of the project. The Authority will continue to coordinate with all utility owners as the design progresses to obtain more detailed utility information.

22.9.2 1928

The Authority reviewed the commenter's attached exhibit, and in response has revised Volume 3.4: General, Utilities, Grading and Drainage, Traction Power & Communication Towers, in the Final Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) to update the sewer service provider from Kinder Morgan to LACSD on sheet UT-C1565.

Sheets UT-C1567 and UT-C1570 correctly identify all relocated and protected utilities. No revisions have been made to the Draft EIR/EIS in response to this comment.

As design advances beyond the environmental phase, detailed coordination with LACSD will be required to determine final design needs and confirm the extent of impacts on all LACSD facilities.

Section 3.6, Public Utilities and Energy, of the Draft EIR/EIS analyzes the potential impacts of conflicts with existing utilities during construction, including those owned and maintained by LACSD. Incorporation of PUE-IAMF#3 (Public Notifications) and PUE-IAMF#4 (Utilities and Energy) require the construction contractor to coordinate with affected utility owners to determine relocation or protection-in-place needs to determine if any approvals or permits are needed prior to construction. With incorporation of the applicable impact avoidance and minimization features, potential impacts related to conflicts with existing sewer infrastructure would be less than significant.

The Authority will continue to coordinate with all utility owners to ensure the necessary approvals and permits are acquired before construction begins.

The Authority will continue to coordinate with LACSD as the project advances, including responding to meeting requests during the next phase of design.

22.9.3 1929

The Authority has revised Table 3.6-3 in Section 3.6 in the Final EIR/EIS to identify LACSD as a sewer service provider. Please refer to Section 16.5.6, Section 3.6: Public Utilities and Energy, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS for these changes.

22.9.4 1930

The Authority has revised Drawing Number UT-C1522 in Volume 3.4: General, Utilities, Grading and Drainage, Traction Power & Communication Towers, in the Final EIR/EIS to update storm drain ownership from LACSD to the City of Vernon.

22.9.5 1931

The Authority has revised the following Drawing Numbers in Volume 3.4: General, Utilities, Grading and Drainage, Traction Power & Communication Towers, in the Final EIR/EIS to correct storm drain ownership from LACSD: UT-C1521, UT-C1522, and UT-C1523 (City of Vernon); UT-C1534, UT-C1535, and UT-C1536 (City of Montebello); UT-C1531 (D2 Interceptor Trunk); UT-C1534 (Montebello Trunk); UT-C1558 (Consolidated Sewer Maintenance District); and UT-C1530 and UT-C1531 (ownership currently unknown).

22.9.6 1932

Refer to response to comment #1931 above.

22.9.7 1933

Refer to response to comment #1931 above.

22.9.8 1934

Refer to response to comment #1931 above.

22.9.9 1935

Refer to response to comment #1931 above.

22.9.10 1936

Refer to response to comment #1931 above.

22.9.11 1937

Refer to response to comment #1931 above.

22.9.12 1938

Refer to response to comment #1931 above.

22.9.13 1939

Refer to response to comment #1931 above.

22.9.14 1940

Refer to response to comment #1931 above.

22.9.15 1941

Refer to response to comment #1931 above.

22.9.16 1942

Refer to response to comment #1928 above.

Los Angeles to Anaheim - RECORD #013736 DETAIL

Status:	Ready for Delimiting
Record Date:	01/26/2026
Interest As:	Local Agency
Full Name:	Nolan Vega Pritchett

Stakeholder Comments/Issues:

Good afternoon, Attached is the comment letter from Councilmember William Go and Kathleen Treseder from the City of Irvine in support of a High-Speed Rail extension from Anaheim to Irvine. We appreciate your time and consideration. Thank you, Nolan Vega Pritchett | Council Executive Assistant Office of Councilmember William Go, City of Irvine 949-724-6220 | 1 Civic Center Plaza, Irvine, CA 92606
NVegaPritchett@cityofirvine.org | cityofirvine.org

City of Irvine
1 Civic Center Plaza, Irvine, CA 92623-9575
cityofirvine.org
949-724-6233

January 26, 2026

California High-Speed Rail Authority
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071

RE: High-Speed Rail Expansion to Irvine

To: California High-Speed Rail Authority

0452

On behalf of the City of Irvine, we appreciate the opportunity to provide public comment on the Los Angeles to Anaheim High-Speed Rail Project and strongly support the project moving forward. **We also respectfully urge the Board to consider extending service beyond Anaheim to Irvineto better serve Orange County's expanding population and strengthen regional connectivity.**

Irvine is a major economic hub and destination city, supported by a strong local economy, a thriving business community, and world-class educational institutions. Irvine is one of the fastest-growing cities in the United States and is currently home to approximately 320,000 residents. Based on current trends, Irvine is on track to become the largest city in Orange County by 2028. As this growth continues, expanding rapid rail access to Irvine would better serve the scale of travel demand between Los Angeles and Orange County.

Irvine's economy is powered by major employers across technology, health care, life sciences, advanced manufacturing, and professional services, making the city a daily destination for workers and visitors from throughout Orange County and the greater region. Irvine is also home to world-class higher education and research institutions, including the University of California, Irvine, and Concordia University, and its continued growth is driving increased travel demand.

In addition, the City of Irvine is advancing one of the most ambitious municipal projects in the country, the Great Park, a multibillion-dollar public investment that will rival iconic destinations such as Central Park in New York and Balboa Park in San Diego. As major amenities are completed, including a new amphitheater, botanical gardens, museums, and expanded recreational attractions, the Great Park will become a signature gathering place and a must-visit destination for residents and visitors from across the state and throughout the country.

City of Irvine
1 Civic Center Plaza, Irvine, CA 92623-9575
cityofirvine.org
949-724-6233

0453

A High-Speed Rail connection to Irvine would strengthen the regional value of this investment by expanding access to fast, reliable rail service for residents, employees, students, and visitors across Orange County, while also increasing ridership potential and improving system performance. Irvine is a hub for daily regional travel: 72% of Irvine's residents commute outside the city for work, and 88% of the workforce commute into the city, many relying on rail services, resulting in a high level of multimodal transportation[1]. Irvine currently supports both Amtrak and Metrolink service, providing a strong foundation for integration and future expansion. An Irvine stop would build on existing regional rail infrastructure and connect more of Orange County to the high-speed rail network in a practical and cost-effective way.

0454

We recognize that final route decisions involve complex technical, operational, environmental, and financial considerations. While we fully support the Los Angeles to Anaheim segment as currently proposed, we respectfully request that the Authority keep Irvine's long-term growth, regional importance, and strategic location in mind as the project advances.

Thank you for your leadership on this critical statewide infrastructure project. We appreciate your consideration and look forward to continued collaboration as this work moves forward.

Sincerely,

William Go
Councilmember, Irvine District 2
Chair, Great Park Board
Director, Orange County Transportation Authority
Director, MetroLink

Kathleen Treseder, PhD
Councilmember, Irvine At-Large
Director, Great Park Board
Professor, Ecology & Evolutionary Biology,
University of California, Irvine

[1] Orange County Transportation Authority, "Welcome Orange County Maintenance Facility," September 11, 2023, https://www.octa.net/pdf/OCMF_OpenHouseMeetingBoards_091123.pdf.

22.10 Response to Submission 013736 (Nolan Vega Pritchett, City of Irvine Councilmember William Go and Kathleen Treseder, Jan 26, 2026)

22.10.1 0452

Refer to Standard Response LAA-Response-GENERAL-04: General Opinions, Opposition, or Support, in Chapter 18, Standard Responses.

The California High-Speed Rail Authority (Authority) acknowledges the commenter's support for an Anaheim to Irvine subsection. The Los Angeles to Anaheim Project Section is part of Phase 1 of the California High-Speed Rail (HSR) System, which provides HSR service between San Francisco and Los Angeles/Anaheim. HSR service south of Anaheim would be evaluated as part of Phase 2 of the HSR system. The 2005 *Final Program Environmental Impact Report/Environmental Impact Statement for the Proposed California High-Speed Train System* (Statewide Program EIR/EIS) evaluated and consequently eliminated a route between Anaheim and Irvine because of potential high costs and complexities with construction and right-of-way. Per the Statewide Program EIR/EIS, a trench segment would have been required in the cities of Orange and Santa Ana, and there was considerable stakeholder opposition to the alignment. Future studies will be prepared for Phase 2 of the HSR system when funding is available. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.10.2 0453

Refer to response to comment #0452 above. The commenter suggests that a connection to Irvine would be beneficial to the city and region. Additional discussions would need to take place with all cities along the corridor between Anaheim and Irvine in the future to determine the feasibility and interest in studying an alignment.

22.10.3 0454

Refer to Standard Response LAA-Response-GENERAL-04: General Opinions, Opposition, or Support, in Chapter 18.

The Authority appreciates the City of Irvine's support of the project, and will continue to coordinate with the city in the future when Phase 2 of the statewide HSR system planning begins.

Los Angeles to Anaheim - RECORD #013754 DETAIL

Status:	Unread
Record Date:	01/27/2026
Interest As:	Local Agency
Full Name:	David Kennedy

Stakeholder Comments/Issues:

0427

Hi, I am reviewing the transportation section of the EIR and I would like to review the Transportation Technical Report to get a better understanding of some of the mitigation measures proposed in Anaheim. Would you be able to send an electronic copy to me? Thanks! David Kennedy, P.E. Associate Transportation Planner City of Anaheim Public Works Department | Traffic and Transportation 200 South Anaheim Boulevard | Suite 276 Anaheim, CA 92805 (714) 765-4920 dkennedy@anaheim.net

22.11 Response to Submission 013754 (David Kennedy, City of Anaheim Public Works Department, Jan 27, 2026)

22.11.1 0427

The California High-Speed Rail Authority contacted the commenter on January 27, 2026, 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 #013773 DETAIL

Status:	Action Pending
Record Date:	01/29/2026
Interest As:	Local Agency
Full Name:	Ryan Erasmo

Stakeholder Comments/Issues:

0459 RE: Request for Review Extension Hello, Good day! I am currently working through the review for the CAL HSR - Los Angeles to Anaheim EIR/EIS document. I understand that the comment for this project is due on February 3,2026, I would like to see if we can get an extension to review this document? We are currently seeking more information from our respective departments for review. Thank you for your consideration in this request. Kindly let me know. Thanks, Ryan R. Erasmo | Departmental Facilities Planner Facilities Planning Bureau Email: rrerasmo@lasd.org | Phone: (323) 526 5614 Los Angeles County Sheriff's Department 4700 Ramona Blvd. 4th Floor Monterey Park, California 91754 RDO: Friday CONFIDENTIALITY NOTICE: This email message, including any attachments, from the Los Angeles County Sheriff's Department is intended for the official and confidential use of the recipients to whom it is addressed. It contains information that may be confidential, privileged, attorney work product, or otherwise exempted from disclosure under applicable law. If you have received this message in error, be advised that any review, disclosure, use, dissemination, distribution, or reproduction of this message or its contents is strictly prohibited. Please notify the sender of this email immediately by reply email that you have received this message in error, and immediately destroy this message, including any attachments. Thank you in advance for your cooperation.

22.12 Response to Submission 013773 (Ryan Erasmo, Los Angeles County Sheriff's Department, Jan 29, 2026)

22.12.1 0459

Refer to Standard Response LAA-Response-GENERAL-08: Requests for Extension of the Comment Period, in Chapter 18, Standard Responses.

The California High-Speed Rail Authority (Authority) contacted the commenter on February 2, 2026, and informed them that the Authority would not be able to extend the comment period.

Los Angeles to Anaheim - RECORD #013785 DETAIL

Status:	Action Pending
Record Date:	01/30/2026
Interest As:	Local Agency
Full Name:	Jivar Afshar

Stakeholder Comments/Issues:

Dear Mr. Galves, Please find attached South Coast AQMD staff's comment letter on the Draft EIR/EIS for the California High-Speed Rail Los Angeles to Anaheim Section (South Coast AQMD Control No. ALL251209-01). If you have any questions or need additional information regarding these comments, please feel free to contact me. Best regards, Jivar Afshar (she, her, hers) Air Quality Specialist, CEQA Planning, Rule Development, & Implementation (909)396-2040 Please note, South Coast AQMD is closed on Mondays.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
Stefan.Galvez@hsr.ca.gov
Erin.Lee@hsr.ca.gov
Los.Angeles_Anaheim@hsr.ca.gov
Stefan Galvez-Abadia, Director of Environmental Services
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

January 30, 2026

Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the California High-Speed Rail Los Angeles to Anaheim Section (Proposed Project) (SCH No: 2007031067)

Dear Mr. Galvez,

The South Coast Air Quality Management District (South Coast AQMD) appreciates the opportunity to comment on the above-referenced document. South Coast AQMD is the regulatory agency responsible for controlling emissions primarily from stationary sources of air pollution within the four-county South Coast Air Basin (Basin) which is comprised of all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and the Riverside County portion of the Salton Sea Air Basin and the non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin (MDAB). The California High-Speed Rail Authority (Authority) is the California Environmental Quality Act (CEQA) Lead Agency for the California High- Speed Rail Los Angeles to Anaheim Section (Proposed Project).

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The Proposed Project would introduce high-speed passenger rail service between Los Angeles Union Station and the Anaheim Regional Transportation Intermodal Center and would include substantial infrastructure improvements, rail operations, and supporting facilities within South Coast AQMD jurisdiction. Construction and operation of the Proposed Project would occur within densely populated urban corridors in the Basin and could result in air quality and public health impacts associated with construction activities, locomotive operations, maintenance activities, and changes in regional transportation patterns. In addition, the Proposed Project would traverse and/or be located in close proximity to multiple AB 617-designated communities, including East Los Angeles, Boyle Heights, and West Commerce; South Los Angeles; and Southeast Los Angeles, which experience elevated cumulative air pollution burdens. Accordingly, South Coast AQMD's review of the Draft EIR/EIS considers potential cumulative air quality and public health impacts in these communities.

Review of the Draft EIR/EIS focused on potential criteria pollutant emissions, toxic air contaminants, greenhouse gas emissions, and localized air quality and public health impacts that may occur within South Coast AQMD jurisdiction during construction and operation of the Proposed Project. South Coast AQMD recognizes the State's policy goals to expand electrified passenger rail and reduce greenhouse gas emissions from the transportation sector. However, as

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discussed in the attached detailed comments, South Coast AQMD has identified several areas where additional clarification is needed in the Draft EIR/EIS to address uncertainties associated with third-party freight rail activities, including (Burlington Northern and Santa Fe Railway) BNSF-related operations and construction, the availability of operation data for freight rail facilities owned and operated by third-party entities (e.g., BNSF at Hobart Yard and Commerce Yard), and the extent to which key assumptions and mitigation measures can be achieved in practice and enforced. The attached comments also identify opportunities to strengthen the Draft EIR/EIS, particularly with respect to construction and operational emissions and potential health risk impacts associated with third-party components of the Proposed Project. Therefore, South Coast AQMD recommends that the Lead Agency incorporate the clarifications, additional disclosure, and feasible mitigation measures identified in this letter into the Final EIR/EIS, as appropriate.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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South Coast AQMD Comments

To provide context, South Coast AQMD has provided a brief summary of the Proposed Project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR/EIS

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Based on the Draft EIR/EIS, the California High-Speed Rail (HSR) Authority completed a Statewide Tier 1 program-level EIR/EIS in November 2005 as the first phase of a tiered environmental review process for the proposed HSR system. The Tier 1 EIR/EIS evaluated a statewide high-speed electric-powered rail system intended to link California's major metropolitan areas, interface with airports, mass transit, and highways, relieve capacity constraints in the existing transportation system, and do so in a manner protective of California's natural resources.[1]

The HSR Authority has now prepared a Tier 2 project-level Draft EIR/EIS for the Los Angeles to Anaheim Project Section, an approximately 30-mile corridor extending from Los Angeles Union Station (LAUS) to the Anaheim Regional Transportation Intermodal Center (ARTIC) which traverses portions of Los Angeles and Orange Counties, including the cities of Los Angeles, Vernon, Commerce, Bell, Montebello, Pico Rivera, Norwalk, Santa Fe Springs, La Mirada, Buena Park, Fullerton, and Anaheim, as well as areas of unincorporated Los Angeles County.[2]

The Draft EIR/EIS evaluates a No Project Alternative and two build alternatives. Shared Passenger Track Alternative A (the HSR Authority's preferred alternative), and Shared Passenger Track Alternative B.[3]

Shared Passenger Track Alternative A would include approximately 30 miles of new and upgraded rail track, installation of an overhead contact system for use by electric locomotives, traction power facilities, and a light maintenance facility located at 26th Street in the City of Vernon. The Proposed Project would also include constructing additional freight rail tracks and grade separations, making drainage improvements, adding communications and security infrastructure, modifying existing passenger rail stations, and constructing an HSR station at ARTIC. The Proposed Project would operate within the existing Los Angeles–San Diego–San Luis Obispo Rail Corridor, with shared use of rail tracks by HSR, commuter, and intercity passenger rail services.[4]

Shared Passenger Track Alternative B is identical to Alternative A except that the light maintenance facility would be sited at 15th Street in the City of Los Angeles rather than in Vernon.[5] Although not part of the Proposed Project, the Draft EIR/EIS also evaluates an optional intermediate HSR station at either the Norwalk/Santa Fe Springs Metrolink Station or the Fullerton Metrolink/Amtrak Station.[6] Both Shared Passenger Track Alternatives include early action activities intended to improve safety, mobility, and operational reliability for existing freight and passenger rail services prior to full implementation of HSR service, such as constructing grade

[1] Draft EIR/EIS, Summary; pp. S-4 and S-5.
[2] Draft EIR/EIS, Chapter 1-Project Purpose, Need, and Objectives.
[3] Draft EIR/EIS, Chapter 2 – Alternatives.
[4] *Ibid.*
[5] *Ibid.*
[6] *Ibid.*

0540 separations, making improvements to rail infrastructure, and enhancing passenger stations. These early action activities may be implemented by the HSR Authority or in coordination with local and regional agencies and may undergo separate environmental review processes.[7]

I. Uncertainty Regarding the Mitigation Measure AQ-MM#4 and Improper Deferral of Health Risk Assessment (HRA)

0541 Chapter 3 - Air Quality and Global Climate Change identifies Mitigation Measure AQ-MM#4, which requires the preparation of a future operational HRA to evaluate potential air quality and public health impacts associated with increased rail activity at the Hobart Yard resulting from the relocation of approximately 101,094 feet of staging and storage track.[8] The intent of requiring the preparation of a future operational HRA is to determine whether additional mitigation measures may be needed. While AQ-MM#4 intends to address potential increases in emissions of diesel particulate matter (DPM), a toxic air contaminant, and related cancer and non-cancer health risks, the Draft EIR/EIS does not provide sufficient evidence to ensure that this mitigation measure can be implemented and enforced.[9] Specifically, the Draft EIR/EIS does not identify any enforceable agreement, memorandum of understanding, or other legally binding mechanism between the Lead Agency and BNSF, the operator of the Hobart Yard, that would require BNSF to provide the operational data necessary to conduct the future operational HRA. Such data would need to include locomotive activity levels, idling times, switching operations, train frequency, and other operational parameters directly influencing emissions and health risk estimates.

By not having an enforceable mechanism in which BNSF commits to providing the necessary data, Mitigation Measure AQ-MM#4 is not feasible as currently structured. Also, without an assurance that both current and future project-specific operational data will be provided by BNSF, preparation of the future operational HRA may need to rely on other information as a surrogate and this surrogate information may not be accurate and may produce results which underestimate the actual emissions and associated health risks.

Under CEQA, mitigation measures must be enforceable and supported by substantial evidence demonstrating that they will be implemented as proposed and will effectively reduce identified impacts. In addition, while CEQA allows limited deferral of mitigation under certain circumstances, the formulation of mitigation measures shall not be deferred until some future time.[10] Where a mitigation measure relies on future data collection and analysis to determine whether impacts are significant or how they will be mitigated, CEQA requires that the Lead Agency demonstrate with substantial evidence[11] that the necessary information will be available and that the mitigation will be enforceable.[12] However, as currently proposed, Mitigation Measure AQ-MM#4 lacks the required level of certainty in that it does not specify in the Draft EIR/EIS what additional mitigation measures will be applied in the future if the future operational HRA identifies significant cancer or non-cancer health risks. As currently framed, Mitigation Measure AQ-MM#4 only ensures that an operational HRA will be conducted, without providing structure

[7] *Ibid.*
[8] Draft EIR/EIS. p. 3.3-177.
[9] *Ibid.*
[10] CEQA Guidelines Section 15126.4(a)(1)(B)
[11] CEQA Guidelines Section 15151
[12] CEQA Guidelines Section 15126.4(a)(2)

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and guardrails to ensure that the data relied upon is accurate and that carefully crafted, additional mitigation measures would actually be applied to the Proposed Project in the event that the future health risks would be significant. Therefore, the Lead Agency is recommended to provide substantial evidence in the Final EIR/EIS demonstrating that BNSF has committed to providing the necessary operational data. This evidence should include documentation of an enforceable mechanism specifying the scope, timing, and use of the data. Inclusion of this information in the Final EIR/EIS would ensure that Mitigation Measure AQ-MM#4 meets CEQA's requirements for enforceability, feasibility, and effective mitigation of potential air quality and public health impacts. In addition, please refer to the recommended mitigation measures discussed in Section II of this comment letter to craft mitigation measures that could be specified in Final EIR/EIS but will be applied in the future in the even the future operational HRA results in significant adverse health effects.

II. Recommended Air Quality Mitigation Measures and Project Design Considerations

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CEQA requires that all feasible mitigation measures that go beyond what is required by existing law and regulations be utilized to minimize or eliminate any significant adverse air quality impacts. Although the Proposed Project would involve a limited number of HSR-controlled on-road vehicles during operations, South Coast AQMD recommends that the Lead Agency incorporate the following mitigation measures and project design considerations into the Final EIR/EIS to further reduce the Proposed Project's air quality impacts to the extent feasible and within the Authority's control.

HSR-controlled Mobile Source and Operational Mitigation Measures

1. Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road vehicles, where feasible, for HSR-controlled construction support activities, maintenance fleets, service vehicles, and operation support activities associated with station, maintenance facilities and other operational components.

2. Encourage construction contractors and facility service fleet operators to participate in CARB's Clean Fleet Connect program to accelerate the use of ZE/NZE vehicles and equipment, where feasible, to further reduce emissions beyond Tier 4 Final requirements.[13]

3. Clarify and, where feasible, limit operational vehicle trips (e.g., maintenance trucks, delivery vehicles, fueling/service trips) to the activity levels analyzed in the Final EIR/EIS. If substantially greater vehicle activity is anticipated, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

4. Provide electric vehicle (EV) charging infrastructure at stations, maintenance and support facilities to accommodate HSR-controlled ZE service vehicles, future fleet electrification, and contractor fleets.

[13] CARB, Clean Fleet Connect. https://ww2.arb.ca.gov/our-work/programs/truckstop-resources/zev-truckstop/clean-fleet-connect/clean-fleet-connect.

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Note: South Coast AQMD staff is available to discuss the availability of current and upcoming technologies and incentive programs with the Lead Agency.

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Coordination and Agreement-Based Measures Involving Third-Party Rail Facilities (Including BNSF)

1. Emissions Reduction Through Agreements: To the extent that the Proposed Project relies on shared rail infrastructure or future agreements with third-party freight rail operation (e.g. BNSF) and facilities (e.g., Hobart Yard or other BNSF components), the Final EIR/EIS should identify any feasible and enforceable measures to reduce emissions from associated truck drayage, yard support equipment, and freight activity, that could be incorporated into such agreements, where within the Authority's ability to coordinate, to address air quality and public health impacts associated with project-related rail yard activities.

2. Electrification and Infrastructure Improvements: Where feasible and subject to third-party cooperation, the Lead Agency should encourage or support electrification of rail yard infrastructure associated with the Proposed Project, such as electric-powered yard equipment, locomotive plug-in or shore power systems, and other feasible technologies that reduce diesel particulate matter emissions.

3. Information Sharing and Monitoring Commitments: The Final EIR/EIS should identify mechanisms, where feasible, to facilitate data sharing and coordination through the third-party rail operators regarding operational activity levels necessary to support future air quality and health risk evaluations.

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Stationary and Area Source Mitigation Measures

1. On-site Renewable Energy: Maximize the use of on-site renewable energy by installing solar energy arrays on station, maintenance facilities, parking structures, and other operational facilities, where feasible.

2. Energy Efficiency: Use light-colored paving and roofing materials and utilize only Energy Star heating, cooling, and lighting devices and appliances for stations and facility operations.

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Design Considerations to Reduce Localized Exposure

1. Facility Siting and Layout: Design station and maintenance facilities to minimize localized exposure by locating service vehicle circulation routes, loading areas, and equipment staging areas, and emergency generators away from sensitive land uses, where feasible.

2. Idling Control: Implement enforceable operational controls for HSR-controlled vehicles to minimize idling and prevent localized emission hotspots near stations and maintenance facilities.

3. Third-party Freight Yard Design: Where feasible, incorporate project design features and enforceable operational measures to minimize diesel particulate matter (DPM) emissions

0545 associated with third-party freight rail yard support activities (e.g., Hobart Yard) and related construction and operation components.

0546 Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR/EIS:

1. South Coast AQMD 2022 Air Quality Management Plan,[14] specifically:
    a) Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures
    b) Appendix IV-B – CARB's Strategy for South Coast
    c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure
2. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.[15]

III. Potential Underestimation of Cumulative Air Quality Impacts Related to Third-Party Construction Activities and Cumulative Emissions

0547 The Draft EIR/EIS acknowledges that key third-party operational information is unavailable for certain BNSF-related components, particularly the 101,094 feet of proposed support/storage (staging and storage) tracks at Hobart Yard.[16] The Draft EIR/EIS states that activity data for this component of the Proposed Project have not been provided and are not publicly available, and that the Authority's quantitative operational HRA was limited to scenarios based on BNSF activity data that excluded the staging/storage track activities. The Draft EIR/EIS goes on to conclude that the potential DPM-related health risk impacts associated with Hobart Yard modifications would be significant and unavoidable and that a cumulatively significant impact would also occur, with the Proposed Project considerably contributing to these impacts because the level of activity and associated emissions from the Hobart Yard modifications are unknown.[17]

The Draft EIR/EIS further claims that for BNSF-led construction components, only certain mitigation measures can be applied because the HSR Authority cannot ensure that BNSF would implement additional measures.[18] The Draft EIR/EIS also indicates that the HSR Authority would coordinate with third-party property owners such as BNSF to obtain a memorandum of understanding to ensure measures are incorporated, where feasible.[19] Given the uncertainty regarding whether and how mitigation measures would be implemented for the identified third-party construction activities, it is important that the cumulative air quality analysis in the Final

[14] South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan.
[15] United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution.
[16] Air Quality and Global Climate Change Technical Report, Section 2 – Project Description.
[17] Draft EIR/EIS, Section 3.16 – Cumulative Impacts.
[18] Draft EIR/EIS. p. 3.3-120.
[19] Draft EIR/EIS. p. 3.3-56.

0547 EIR/EIS be revised to clearly disclose and evaluate emissions from all reasonably foreseeable projects that could contribute to cumulative impacts within the South Coast Air Basin.

While the Draft EIR/EIS concludes that cumulative impacts may remain significant and unavoidable in the absence of complete third-party data, CEQA requires that the cumulative analysis include all reasonably foreseeable related activities and that all feasible mitigation measures be identified and adopted to reduce impacts to the fullest extent feasible. In this context, third-party freight rail construction and operational activities that are functionally related to the implementation of the Proposed Project should be clearly disclosed and evaluated in the cumulative scenario, even where precise quantification is not possible. Similar issues regarding cumulative impacts associated with freight rail and third-party construction activities at BNSF-operated properties were identified in South Coast AQMD's comment letter on the City of Barstow Proposed General Plan Update and Barstow International Gateway Project, where South Coast AQMD noted uncertainties related to goods-movement activities and associated construction and operational emissions within the Basin (see South Coast AQMD Comment Letter on the Barstow International Gateway Project, January 2026, ODP251113-08).[20]

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0549 Therefore, South Coast AQMD recommends that the Lead Agency: 1) identify the methodology used to compile the cumulative project list; 2) confirm whether other reasonably foreseeable BNSF freight rail capacity or related projects that could affect emissions within the South Coast Air Basin were considered (e.g., City of Barstow Proposed General Plan Update and Barstow International Gateway Project); and 3) if any such projects were excluded, disclose the basis for exclusion in the Final EIR/EIS. Clarifying these issues would improve transparency and ensure that cumulative air quality impacts associated with third-party construction and operations are disclosed and addressed to the extent feasible under CEQA.

IV. Recommended Use of U.S. EPA-Approved EMFAC2021 Off-Model Adjustment Factors for the Analyses of Mobile Source Emissions

0550 The mobile-source emissions analyses conducted in the Draft EIR/EIS for both the baseline and project scenarios appear to rely on the existing EMFAC2021 model parameters without accounting for recent federal changes to California mobile-source regulations and associated emissions modeling assumptions. Specifically, in November 2025, the U.S. EPA approved EMFAC2021 off-model adjustment factors that remove the estimated emission reduction benefits attributed to several California regulations, including the Advanced Clean Trucks (ACT), Zero-Emission Airport Shuttle, Heavy-Duty (HD) Vehicle Warranty and Maintenance Provisions, and Heavy-Duty Omnibus regulations.[21,22] On January 27, 2026, U.S. EPA finalized its partial disapproval of CARB's HD Inspection and Maintenance (I/M) regulation which prohibits the State of California from enforcing the HD I/M to out-of-state registered trucks. As a result, the calculations in the Draft EIR/EIS currently underestimate the projected NOx emissions from trucks and the future

[20] South Coast AQMD's comment letter on the City of Barstow Proposed General Plan Update and Barstow International Gateway Project. Available at: https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2026/january-2026/odp251113-08-deir-city-of-barstow-proposed-general-plan-update-and-barstow-international-gateway-project.pdf.
[21] U.S. EPA Off-Model Adjustment Factors Approval Letter. Accessible at: https://ww2.arb.ca.gov/sites/default/files/2025-12/EPA%20Off-Model%20Adjustment%20Factors%20Approval%20Letter.pdf.
[22] EMFAC2021 Off-Model Adjustment Factors. Accessible at: https://ww2.arb.ca.gov/our-work/programs/msei/emfac2021-model-and-documentation.

0550 mobile source emissions of criteria pollutants and greenhouse gases. Given the long construction horizon of the Proposed Project through 2040, the Lead Agency is recommended to update the mobile emission estimates in the Final EIR/EIS to apply the applicable U.S. EPA-approved EMFAC2021 off-model adjustment factors and disclose how this affects baseline and project emissions.

V. Recommendations to Provide Substantial Evidence to Support the Assumption that Indirect Emission Reductions Will Occur because the Proposed Project Would Reduce Passenger Vehicle Emissions

0551 Chapter 3 - Air Quality and Global Climate Change summarizes the changes in total regional emissions during operations in the 2040 horizon year. The summary accounts for both indirect emissions from passenger vehicle travel and electricity generation, as well as direct emissions from HSR stations, maintenance facilities, and train operations. The Draft EIR/EIS asserts that operation of the Proposed Project would result in net regional emission reductions, primarily attributable to decreases in indirect on-road mobile source emissions. The document further states that the indirect emission reductions from on-road mobile sources would be beneficial to the South Coast Air Basin and would contribute toward attainment of state and federal air quality standards for ozone (O3) and particulate matter (PM10 and PM2.5).[23] These claimed benefits include reductions in regional ozone precursors (VOC and NOx) and particulate matter emissions, which could contribute to decreased ozone formation and secondary PM, potentially resulting in public health benefits such as fewer lost workdays, reduced hospital admissions, and decreased respiratory and cardiovascular effects. Moreover, the Air Quality and Global Climate Change Technical Report indicates that the Proposed Project would reduce annual roadway vehicle miles traveled (VMT) by more than two billion miles in the 2040 horizon year, attributable to a shift in travel behavior whereby passengers are assumed to use the HSR system in lieu of personal vehicle travel.[24]

0552 In addition, according to the technical file, which was provided by the Lead Agency upon request by South Coast AQMD, labeled as *20240207_LA-A_Avoided Emissions_Energy Demand*,[25] the total VMT decreases between 2017 (the baseline year for existing conditions) and 2040 (the Proposed Project's horizon year). However, the Draft EIR/EIS neither includes sufficient information to support this claim, nor identifies enforceable mechanisms to ensure that the projected emission reductions calculated in the technical file would be actually achieved under typical operating conditions. Furthermore, it is unclear how the Proposed Project would directly influence, control, or ensure that emission reductions from passenger vehicles operating within the regional transportation network would occur. In the absence of substantial evidence demonstrating that the projected regional emission reductions are reasonably foreseeable, verifiable, and enforceable, and permanent, the conclusions in the Draft EIR/EIS regarding regional air quality and public health benefits are speculative. Therefore, the Lead Agency is recommended to provide additional substantial evidence in the Final EIR/EIS to support why and how the purported emission reductions will occur, clearly identify key assumptions, disclose uncertainties, and describe any enforceable measures or commitments relied upon to achieve such reductions. This information should be included directly in the Final EIR/EIS itself, rather than in a separate technical file that is available only available upon request. Such disclosure is necessary to ensure

[23] Draft EIR/EIS, Chapter 3 – Air Quality and Global Climate Change, p. 3.3-150
[24] Air Quality and Global Climate Change Technical Report. p. 7-1.
[25] Technical file provided by the Lead Agency labeled *20240207_LA-A_Avoided Emissions_Energy Demand.*

0552 compliance with CEQA requirements and to allow decision-makers and the public to fully evaluate the Proposed Project's regional air quality impacts including any claimed benefits to air quality and public health.

VI. Operational Emissions from Stationary and Portable Sources

0553 The Draft EIR/EIS states that operational criteria pollutant emissions are expected from the use of stationary sources. Based on the Draft EIR/EIS, emergency generators would be needed at three station locations as part of the Proposed Project improvements, including ARTIC Station, Fullerton Station, and Norwalk/Santa Fe Springs Station. Each emergency generator is identified as a diesel-fired unit rated at 1,073 horsepower, and the Draft EIR/EIS indicates these emergency generators would be operated for up to 200 hours per year for testing and maintenance.[26] The Draft EIR/EIS also identifies emergency generators at the existing Hobart Yard, consisting of two on-site units (identified as #1 and #2), represented in the modeling as point sources consistent with a 324-horsepower engine.[27] The Draft EIR/EIS states that the Commerce Yard has no emergency generators, and no emergency generators are identified for the Light Maintenance Facility.[28] However, given the Proposed Project's expansive scale, additional stationary and/or portable sources including but not limited to internal combustion engines, boilers, and spray booths, are typical equipment that would likely be utilized in connection with station operations, maintenance activities, and supporting facilities. Failing to account for these additional potential operational stationary and portable sources and the associated emissions in the analysis could lead to an underestimation of the total operational emissions. As such, the Lead Agency is recommended to: 1) clarify whether additional stationary or portable sources beyond the aforementioned emergency generators would be installed and operated as part of the Proposed Project (including equipment supporting station operations and facility maintenance); and 2) if such sources are reasonably foreseeable, revise the operational emissions analysis to include these sources and associated criteria pollutant emissions to ensure full disclosure of the Proposed Project's operational air quality impacts in the Final EIR/EIS.

VII. South Coast AQMD Air Permits and Role as a Responsible Agency

0554 Since implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. The Final EIR/EIS should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[29] Rule 203 – Permit to Operate,[30] Rule 401 – Visible Emissions,[31] Rule 402 – Nuisance,[32] Rule 403 – Fugitive Dust,[33] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[34] Rule 1113

[26] Appendix B – Operational Emissions. pp. 26, 57, and 87.
[27] Air Quality and Global Climate Change Technical Report-Table 6-10. p. 6-36.
[28] *Ibid.*
[29] South Coast AQMD, Rule 201 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf.
[30] South Coast AQMD, Rule 203 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf.
[31] South Coast AQMD, Rule 401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf.
[32] South Coast AQMD, Rule 402 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf.
[33] South Coast AQMD, Rule 403 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.
[34] South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf.

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– Architectural Coatings, [35] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,[36] Regulation XIII – New Source Review,[37] Rule 1401 – New Source Review of Toxic Air Contaminants,[38] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[39] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[40] etc. It is important to note that if air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

It is important to note that if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

VIII. Information on the CERPs for the Designated AB 617 Communities

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The Proposed Project would traverse and/or be located in close proximity to multiple AB 617-designated communities, including East Los Angeles, Boyle Heights, and West Commerce (ELABHWC); South Los Angeles (SLA); and Southeast Los Angeles (SELA). These communities are heavily impacted by air pollution generated from sources such as freeways, heavy-duty diesel truck traffic, rail operations, warehouses, industrial land uses, and goods movement activities. An

[35] South Coast AQMD, Rule 1113 is available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf.
[36] South Coast AQMD, Rule 1166 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf.
[37] South Coast AQMD, Regulation XIII is available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii.
[38] South Coast AQMD, Rule 1401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf.
[39] South Coast AQMD, Rule 1466 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf.
[40] South Coast AQMD, Rule 1470 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf.

0555 AB 617-designated community requires South Coast AQMD to work with a Community Steering Committee (CSC) to develop a Community Emissions Reduction Plan (CERP) that identifies air quality priorities and actions to reduce air pollution in the community. The South Coast AQMD's Governing Board adopted the AB 617 ELABHWC, SLA and SELA Community CERPs in September 2019 [41], December 2020 [42] and June 2022,[43] respectively.

South Coast AQMD staff recommends that the Lead Agency review the actions identified in Chapter 5 of the adopted CERPs and continue working with South Coast AQMD's AB 617 staff to explore whether additional feasible mitigation measures or project design features could be identified and implemented during future project-level approvals to further reduce air pollution impacts and support implementation of the adopted CERPs in these communities.

0556 Given that the Proposed Project traverses multiple AB 617-designated communities that have been identified by South Coast AQMD as experiencing elevated cumulative air pollution burdens, South Coast AQMD staff recommends that the Final EIR/EIS provide additional analysis and disclosure regarding localized and cumulative air quality and health risk impacts in these communities. As mentioned in Section I of this comment letter, the reliance on unavailable third-party operational data and the deferral of key health risk evaluations (such as the future operational HRA at Hobart Yard) may limit the ability of decision-makers and the public to fully understand potential cumulative and disproportionate impacts. Therefore, the Lead Agency is recommended to include a discussion in the Final EIR/EIS which addresses how the emissions minimization measures and mitigation framework, to the extent feasible and enforceable under CEQA, would be consistent with the air quality priorities identified in the adopted CERPs for the ELABHWC, SLA and SELA Communities and would reduce cumulative impacts in these affected communities.

Conclusion

0557 As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR/EIS. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR/EIS. In addition, as noted in CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

[41] South Coast AQMD. September 2019. Assembly Bill 617 East Los Angeles, Boyle Heights, West Commerce Community Emissions Reduction Plan. Accessed at: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/east-la/cerp/carb-submittal/final-cerp.pdf.

[42] South Coast AQMD. December 2020. Assembly Bill 617 Southeast Los Angeles Community Emissions Reduction Plan. Accessed at: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/southeast-los-angeles/final-cerp/final-cerp.pdf.

[43] South Coast AQMD. September 2019. Assembly Bill 617 South Los Angeles Commerce Community Emissions Reduction Plan. Accessed at: https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/south-la/final-cerp.pdf.

22.13 Response to Submission 013785 (Jivar Afshar, South Coast Air Quality Management District, Jan 30, 2026)

22.13.1 0539

The commenter provides a general summary of the overall project components and the findings of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) Section 3.3, Air Quality and Global Climate Change. This comment does not address the sufficiency of the Draft EIR/EIS, nor does it suggest edits to the document; accordingly, no change has been made to the document in response to this comment.

22.13.2 0540

The commenter summarizes the components of the high-speed rail (HSR) project. This comment does not address the sufficiency of the Draft EIR/EIS, nor does it suggest edits to the document; accordingly, no change has been made to the document in response to this comment.

22.13.3 0541

This comment expresses concern regarding the implementation and enforceability of AQ-MM#4, Requirement of a Future Operational Health Risk Assessment (HRA). The comment asserts that the Draft EIR/EIS lacks sufficient evidence to ensure that this mitigation measure can be implemented and enforced. In addition, this comment contends that AQ-MM#4 does not specify what additional mitigation measures will be applied in the future if the future HRA identifies a significant impact.

The Authority respectfully disagrees with these concerns and assertions.

The Authority has coordinated and continues to coordinate closely with BNSF Railway (BNSF) to reach an enforceable agreement to ensure that BNSF will provide the necessary data for the future operational HRA. BNSF has provided written confirmation to the Authority that, until the integrated operating plan for this corridor is developed, BNSF cannot provide any certainty as to what freight movements will occur on the relocated storage and staging tracks. Without such data, impact assessment would be speculative.

An existing impact avoidance and mitigation feature (IAMF) would help ensure the provision of data to support the future operational HRA. Specifically, TR-IAMF#13, Stakeholder Coordination with Transportation Agencies, includes future Authority coordination with agencies including BNSF. This will result in an operating agreement that gives the rail operators the inputs needed to develop the activity data that will in turn support completion of a supplemental HRA.

Additionally, the Final EIR/EIS reflects a revision to AQ-MM#4 to more expressly state that the Authority will complete any additional California Environmental Quality Act (CEQA) review, National Environmental Policy Act (NEPA) review, or both, that may be needed should the supplemental HRA 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, Section 3.3: Air Quality and Global Climate Change, in Chapter 16, Corrections and Additions to the Draft Report, for these changes.

The Authority's incorporation of IAMFs and implementation of mitigation measures identified in the Final EIR/EIS are required as part of the future procurement packages and contracts for the construction of the Los Angeles to Anaheim Project Section. This includes the IAMF and mitigation measure discussed above that would support the provision of inputs needed to support the supplemental HRA.

AQ-MM#4 expressly enumerates three potential mitigation strategies: (1) upgrading or replacing diesel-powered railyard equipment with cleaner, lower-emission technologies, including Tier 4, zero-emission (ZE), or electric equipment; (2) installing enhanced air filtration at affected sensitive receptors to reduce indoor exposure to particulate matter where health-risk thresholds are exceeded; and (3) adopting new emissions-control technologies as they become available to further reduce diesel particulate matter (DPM) emissions over time.

The mitigation measures recommended in Section II are discussed in detail in responses to comments #0542 through #0546. Although the Authority does not have the legal authority to control operational activities at the yards of third-party freight operators, such as BNSF, we will share South Coast Air Quality Management District (SCAQMD) recommendations with such parties.

22.13.4 0542

This comment recommends additional mitigation measures to reduce adverse air quality effects during construction and operation. As discussed in Draft EIR/EIS Section 2.10.3, General Approach, consistent with the Authority's Sustainability Policy (Authority 2020), the Authority will continue to implement sustainability practices that inform and affect the planning, siting, design, construction, mitigation, operation, and maintenance of the HSR system. The Authority is committed to:

- Achieving net-zero greenhouse gas and criteria pollutant emissions during construction
- Operating the system entirely on renewable energy
- Achieving net-zero energy, Leadership in Energy and Environmental Design (LEED) Platinum Facilities
- Planning for climate adaption and resilience
- Prioritizing life-cycle considerations
- Planning for climate change risks and vulnerabilities through sustainable infrastructure
- Building infrastructure that reinforces Sustainable Communities Strategies (SCS)
- Building an HSR system that provides economic value to Californians

The first part of the comment recommends use of ZE or near-ZE on-road vehicles during project construction, maintenance, and operation. Draft EIR/EIS Section 3.3.7, Mitigation Measures, discusses the mitigation measures that the Authority is implementing to reduce adverse air quality impacts. For construction these measures include AQ-MM#2, Requirements for Use of Zero-Emission or Near-Zero-Emission Vehicles and Off-Road Equipment to Reduce Construction Emissions. AQ-MM#2 requires that a minimum of 25 percent (with a goal of 100 percent) of all light-duty on-road vehicles (e.g., passenger cars, light-duty trucks) associated with project construction (including but not limited to on-site vehicles and contractor vehicles) use ZE or near-ZE technology. Based on the Authority's ongoing coordination with SCAQMD, the Authority has revised AQ-MM#2 to clarify that the remaining emissions would be offset to conform with 40 Code of Federal Regulations (CFR) Part 93.158(a). Refer to Final EIR/EIS Chapter 16, Section 16.5.3, for the revised measure. For operations and maintenance, as discussed in Draft EIR/EIS Section 2.10.3, consistent with the Authority's Sustainability Policy (Authority 2020), project facilities will be designed to achieve Net-Zero Energy for operations and to be capable of being LEED certified at the platinum level. As discussed in Section 3.3 (Impacts AQ-4, AQ-5, AQ-6, AQ-11, AQ-12, AQ-13, AQ-14, and AQ-16), project operation would result in regional air quality benefits. These benefits are associated with a decrease in vehicle miles traveled (VMT) from travel mode shifts: from vehicles and aircraft to HSR (which has fewer emissions relative to these other modes of transportation). Therefore, because there are no long-term adverse air quality effects associated with operation and maintenance of the project, no additional mitigation measures are required.

The second part of the comment recommends that the Authority encourage construction contractors and facility service fleet operators to participate in the California Air Resources Board's (CARB) Clean Fleet Connect program. AQ-MM#2, as amended, establishes a goal for the Authority and all project construction contractors that a minimum of 10 percent of such vehicles/equipment are ZE or near-ZE. As part of AQ-MM#2, the project will have a goal of surpassing the requirements of these or other future regulations as a mitigation measure. This measure is compatible with the request to accelerate the use of ZE/near-ZE vehicles and equipment, where feasible, to further reduce emissions beyond Tier 4 Final requirements. The purpose of CARB's Clean Fleet Connect tool is to recognize fleets using medium- and heavy-duty ZE vehicles in California. As discussed in response to the first part of this comment, because there are no long-term adverse air quality effects associated with operation and maintenance of the project, no additional mitigation measures are required for the facility service fleet operators. These mitigation measures and policies address the concerns raised in the second part of the comment.

The third part of the comment asks for limitations on operational vehicle trips. As discussed under Impact AQ-4 of Draft EIR/EIS Section 3.3.6, project operations are anticipated to result in a net reduction of criteria pollutant emissions relative to both existing conditions and the No Project Alternative. As the HSR-controlled stationary and area-source emissions would not result in a significant adverse air quality impact, mitigation measures, such as the request to limit operational vehicle trips, are not required.

The fourth part of the comment asks for HSR stations to include electric vehicle charging infrastructure, including for use by project maintenance and support vehicles. In building stations and other facilities, the Authority will comply with the California Green Building Standards Code (CALGreen). Table 5.106.5.3.1 of the 2025 CALGreen lists the number of electric vehicle–capable parking spaces and electric vehicle charging stations required for nonresidential parking spaces. As CALGreen is updated every 3 years, the number of electric vehicle–capable parking spaces and electric vehicle charging stations will be determined at the start of construction. This addresses the concerns raised in the fourth part of the comment.

22.13.5 0543

The comment also includes several suggested control measures seemingly intended to apply to operational activities of BNSF or other third-party operators. The suggestions are noted and the Authority will share these suggestions with such operators. All third-party freight rail yard support activities would be required to comply with any applicable federal and state regulations (including those of SCAQMD and CARB), adherence to which would limit DPM emissions. The Authority does not have the legal authority to control operational activities at the yards of third-party freight operators, including the suggestion that such third-party operators replace their existing DPM-emitting vehicles at Hobart Yard with cleaner, lower-emitting vehicles.

22.13.6 0544

This comment recommends incorporating additional mitigation measures that would reduce on-site operational emissions. However, as presented in Draft EIR/EIS Section 3.3, Table 3.3-31, project operations would result in a significant decrease in air pollutants (nitrogen oxides [NO_X] and particulate matter) in the South Coast Air Basin. Additionally, as presented in Draft EIR/EIS Table 3.3-33, the direct and indirect emissions associated with the light maintenance facility (LMF) operation, HSR station operation, and changes in power plant emissions would be substantially lower than the net reduction in passenger vehicle emissions. Because the project stationary and area-source emissions would not result in a significant adverse air quality impact during operation, the additional mitigation measures are not required.

Notably, as discussed in Draft EIR/EIS Section 2.10.3, consistent with the Authority's Sustainability Policy (Authority 2020), project facilities will be designed to achieve Net-Zero Energy for operations and to be capable of being LEED certified at the platinum level. As further detailed in Section 2.10.3, the Authority is committed to:

- Achieving net-zero greenhouse gas and criteria pollutant emissions during construction
- Operating the system entirely on renewable energy
- Achieving net-zero energy, LEED Platinum Facilities
- Planning for climate adaption and resilience
- Prioritizing life-cycle considerations
- Planning for climate change risks and vulnerabilities through sustainable infrastructure
- Building infrastructure that reinforces SCS
- Building an HSR system that provides economic value to Californians

No revisions have been made to Draft EIR/EIS in response to this comment.

22.13.7 0545

The comment requests the Authority incorporate listed design considerations involving facility siting, idling control, and third-party freight yard design to reduce localized exposure to pollutants.

Regarding considerations for facility siting, refer to the response to comment #1166 in Section 22.37, Response to Submission 013878 (Jessica Serrano, City of Commerce, Feb 3, 2026), in this chapter. Section 3.1: Light Maintenance Facility (LMF), in the Authority's Requirements for High-Speed Trainset Fleet and Infrastructure Maintenance Facilities Technical Memorandum (Authority 2024) lists anticipated equipment for LMFs; the listed equipment would not include emergency generators or any diesel combustion engines or other equipment that would be sources of toxic air contaminants (TAC). Section 5 of that document likewise does not include emergency generators or other diesel equipment in the guidelines and design specifications for LMFs. In addition, as stated in Draft EIR/EIS Section 3.3, Impact AQ-13, the LMF and the HSR station at Anaheim Regional Transportation Intermodal Center (ARTIC) would not have any diesel emergency generators or other diesel stationary sources that would require an SCAQMD permit. Therefore, the LMFs and ARTIC station would not be a source of localized TACs. Furthermore, Draft EIR/EIS Section 3.3, Table 3.3-43 through Table 3.3-45 present that LMF and station operations would not exceed applicable SCAQMD localized significance thresholds. Because operation of the LMF and HSR stations would not result in a significant adverse air quality impact, changes to the facility siting and layout are not necessary.

Regarding the request to implement measures on emissions-emitting vehicles, all third-party freight rail yard support activities would be required to comply with the applicable SCAQMD and CARB regulations of their own accord. Adherence to these regulations would limit DPM emissions. For additional information regarding how DPM emissions associated with operations will be evaluated and addressed, including through the operational HRA required by mitigation measure AQ-MM#4, refer to the response to comment #0541 above.

Regarding the request to implement idling controls for HSR-controlled vehicles, because HSR-controlled vehicles such as heavy maintenance equipment would be required to comply with the 5-minute idling limit set by CARB in 13 California Code of Regulations 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, no additional idling controls would be required. (High-speed trains to be operated by the Authority would be electric powered and thus not result in any localized emissions.)

Regarding third-party freight yard design, refer to response to comment #0543 above.

22.13.8 0546

This comment requests that the Authority review guidance materials (SCAQMD 2022 *Air Quality Management Plan* [AQMP] and U.S. Environmental Protection Agency [USEPA] *Mobile Source Pollution – Environmental Justice and Transportation*) with an eye to incorporating any additional feasible mitigation measures.

The Authority undertook this review, focusing on impacts that remain significant/adverse even with implementation of mitigation measures (as identified in the Draft EIR/EIS and modified in the Final EIR/EIS).

The Authority has reviewed the 2022 AQMP (specifically Appendices IV-A, IV-B, and IV-C), and did not find additional feasible mitigation measures that can be incorporated into the project's Final EIR/EIS.

Appendix IV-A includes Stationary Source NO_X Measures for residential, commercial, and large combustion sources. The residential and large combustion source measures are not applicable to the project. As discussed in the Authority's Sustainability Policy (April 2020), the project facilities would be designed and built to be Net-Zero Energy for operations and can be LEED certified at the platinum level. Therefore, additional source control measures are not required. Of the Proposed Mobile Source 8-Hour Ozone Measures listed in Table IV-A-2, MOB-02B: Emission Reductions at Existing Rail Yards and Intermodal Facilities would potentially reduce DPM emissions at the existing Hobart and Commerce Yards. However, the Authority lacks the legal authority to require third-party rail operators to replace existing DPM-emitting vehicles with cleaner, lower-emitting vehicles. For additional information regarding how DPM emissions associated with operations will be evaluated and addressed, including through the operational HRA required by mitigation measure AQ-MM#4, refer to the response to comment #0541 above.

Appendix IV-B, Chapter 5, includes a series of State Implementation Plan (SIP) Measures to reduce emissions from on-road vehicles, VMT, off-road equipment, consumer products, residential and commercial buildings, pesticides, and primarily federally and internationally regulated sources. Many of these categories are inapplicable to the project. Because the project provides an operational air quality benefit, no additional measures are necessary to further reduce the project's regional VMT emissions. As discussed above, the Authority's Sustainability Policy and LEED platinum construction goal would reduce the project's operational emissions to the extent feasible. Finally, all on- and off-road measures included in Appendix IV-B are already accounted for in AQ-MM#2. AQ-MM#2 has been revised to clarify that the emissions will be offset to conform with 40 CFR Part 93.158(a). Please refer to Section 16.5.3 in Chapter 16 of the Final EIR/EIS for these changes. Therefore, the Authority has reviewed the SIP Measures and determined that the appendix does not include any additional feasible mitigation measures that can be incorporated into the project's Final EIR/EIS.

Appendix IV-C describes the Southern California Association of Governments' (SCAG) Regional Transportation Plan/SCS and Transportation Control Measures to address the 2015 8-hour ozone standards in the South Coast Air Basin. This appendix includes regional plans and policies that would aid SCAG in meeting its regional goals. Although there are no project-specific measures that apply to the project, construction of the California HSR is listed as a component of SCAG's vision for passenger rail. Therefore, the Authority has reviewed this appendix and determined that it does not include any project-specific measures that can be incorporated into the project's Final EIR/EIS.

The Authority also reviewed the USEPA Mobile Source Pollution – Environmental Justice and Transportation website (both in early January 2025 as well as in March 2026). As of July 2026, the USEPA website no longer exists. The January 2025 website included references to on- and off-road emission regulations for aircraft, locomotives, marine vessels, and nonroad vehicles and engines. All on- and off-road measures included in the January 2025 version are already accounted for in AQ-MM#2. Therefore, the Authority's review did not yield any additional feasible mitigation measures for incorporation.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.13.9 0547

This comment discusses the availability of information regarding BNSF-related operational activities for the storage and staging tracks, the Authority's ability to require mitigation for third-party construction and operational activities, and the treatment of those activities in the cumulative air quality analysis.

For additional information regarding how DPM emissions associated with operations will be evaluated and addressed, including through the operational HRA required by mitigation measure AQ-MM#4, refer to the response to comment #0541 above.

Please refer to response to comment #0543 above for a discussion of the applicability of third-party control measures.

Final EIR/EIS Section 16.5.19, Section 3.19: Cumulative Impacts, reflects revisions to the Draft EIR/EIS to include additional reasonably foreseeable projects and functionally related third-party activities that could contribute to cumulative impacts in the South Coast Air Basin. As noted in the response to comment #0541 above, AQ-MM#4 has been revised to state that the Authority will complete additional CEQA review, NEPA review, or both, as necessary, if the supplemental HRA demonstrates that health risks at Hobart Yard would exceed the health risk exposure levels identified in the Draft EIR/EIS. Such additional environmental review would include consideration of cumulative impacts to the extent required by federal and state law.

22.13.10 0548

Refer to the response to comment #0547 above. The Authority revised the cumulative project list to include the City of Barstow General Plan and Barstow International Gateway Project. The cumulative air quality and transportation impact discussions have been revised to reflect this inclusion. Please refer to Final EIR/EIS Section 16.5.19 for these changes. Incorporation of these revisions did not

result in any changes to cumulative impact conclusions or contributions to significant cumulative impacts.

22.13.11 0549

This comment requests that the Authority identify the methodology used to compile the cumulative project list and requests confirmation of whether other reasonably foreseeable BNSF freight rail capacity or related projects that could affect emissions within the South Coast Air Basin were considered.

Section 3.19.3, Methods for Evaluating Impacts, explains the methodology for the cumulative resource study area and preparation of the cumulative project list. As stated in in this section, the cumulative analysis for the Shared Passenger Track Alternatives considers general plan buildout projections and capital improvement plan anticipated improvements identified for Los Angeles and Orange Counties and numerous local cities and communities (Los Angeles, Vernon, Bell, Commerce, Montebello, Pico Rivera, Santa Fe Springs, Norwalk, La Mirada, Buena Park, Fullerton, Anaheim, West Whittier–Los Nietos, Orange, and South Whittier).

To this end, the projects included in Appendix 3.19-A, Cumulative Plans and Nontransportation Projects List, include multiple rail infrastructure improvement and expansion projects along the BNSF railway. These include the BNSF Third Main Track and Grade Separation Project. In response to this comment, the Authority revised the cumulative project list to include the City of Barstow General Plan and Barstow International Gateway Project. The cumulative air quality and transportation impact discussions have been revised to reflect this inclusion. Please refer to Final EIR/EIS Section 16.5.19 for these changes. Incorporation of these revisions did not result in changes to cumulative impact conclusions or contributions to significant cumulative impacts. No further revisions are warranted.

No other BNSF freight rail capacity or related projects with the potential to affect the South Coast Air Basin were found or excluded.

22.13.12 0550

According to the USEPA Off-Model Adjustment Factors Approval Letter (https://ww2.arb.ca.gov/sites/default/files/2025-12/EPA%20Off-Model%20Adjustment%20Factors%20Approval%20Letter.pdf), emissions estimates in the SIP submittals, analyses for transportation plan and transportation improvement program conformity determinations, and hot-spot analyses for project-level conformity determinations must be based on Emission Factors 2021 (EMFAC2021) with these adjustment factors.

At the time the Draft EIR/EIS was issued, the November 2025 EMFAC2021 off-model adjustment factors were not available. However, in response to this comment, the Authority has revised the air quality modeling in the Draft EIR/EIS's NEPA analysis with inclusion of the EMFAC2021 adjustment factors, consistent with the USEPA guidance. Because these EMFAC2021 adjustment factors are only applicable to SIP submittals and conformity determinations, the CEQA analysis need not be updated with these EMFAC2021 adjustment factors.

Draft EIR/EIS Section 3.3 has been updated accordingly to reflect incorporation of the EMFAC2021 adjustment factors for the NEPA analysis. The incorporation of these revisions did not result in changes to the NEPA impact conclusions or contributions to significant cumulative impacts. Refer to Final EIR/EIS Section 16.5.3 in Chapter 16 for a summary of related changes.

22.13.13 0551

The comment recites content from Draft EIR/EIR Section 3.3. This comment does not address the sufficiency of the Draft EIR/EIS, nor does it suggest edits to the document; accordingly, no change has been made to the document in response to this comment.

22.13.14 0552

The commenter asserts that the Draft EIR/EIS does not include sufficient information to support the VMT reduction estimates reported in the document and does not include enforceable mechanisms to ensure that corresponding project emissions reductions are achieved. VMT estimates used in the

Draft EIR/EIS were developed using ridership forecasts from the California Rail Ridership Model as described on pages 3.3-64 and 3.3-65 of the Draft EIR/EIS in the section titled Criteria Pollutant Mass Emissions. As described on page 30 of the 2023 Project Update Report, the California Rail Ridership Model provides a detailed understanding of the ridership effects of connecting HSR with regional and local transit services, and its development involved an extensive data collection process and updated demographic forecasts throughout California. This state-of-the-art travel demand model encompassing the entire state of California as well as external travel links reflects travel to and from neighboring states, and generates more robust estimates than the Business Plan Model (BPM-V3) previously employed to model ridership. More detailed information on the model is available in the Ridership Model Documentation Technical Report to the 2024 Business Plans; this technical report is available on the Authority's website (https://hsr.ca.gov/wp-content/uploads/2024/02/California-Rail-Ridership-Model-Documentation-2024-BP-submitted-Final-A11Y.pdf). Although the 2023 Project Update Report does not calculate specific VMT reductions for the Los Angeles to Anaheim Project Section, an assumption of 1.8 average vehicle occupancy for long-distance trips was applied to calculate VMT reductions from the anticipated HSR passenger miles traveled. This method was also applied to support the VMT reduction calculations presented in the Authority's 2023 Sustainability Report. Although ridership forecasts are lower in the 2024 Business Plan relative to those presented in the 2023 Project Update Report, the VMT reductions associated with the lower ridership forecasts still reflect reduced VMT with the project alternatives. This outcome is consistent with the VMT forecast trends in the Draft EIR/EIS, which indicate that VMT reductions would be benefits accruing as a result of construction and operation of the project. As further detailed in Draft EIR/EIS Appendix 1-A, Changes in Project Benefits and Impacts, although discrepancies in ridership projections do not result in any new or more severe adverse environmental effects, project benefits could be less than what is reported.

22.13.15 0553

The comment requests clarification on the potential use of additional stationary generators or other sources of TAC sources beyond those disclosed in Draft EIR/EIS Section 3.3. The Authority can confirm that it does not plan to install or operate as part of the project any additional stationary TAC emission sources beyond the emergency generators listed in the comment (which were analyzed in the Draft EIR/EIS). Therefore, there would not be any other stationary or portable sources at the stations or supporting facilities. As discussed in Section 6.3.2 of the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report*, the LMF would be used for train storage, examinations in service, and inspections. According to Section 3.1 of the Authority's Requirements for High-Speed Trainset Fleet and Infrastructure Maintenance Facilities Technical Memorandum (Authority 2024), which identifies anticipated equipment for LMFs, no diesel combustion engines or other equipment that would be sources of TACs would be included. In addition, Section 5: Light Maintenance Facility (LMF), of that document does not include emergency generators or other diesel equipment in the guidelines and specifications for LMFs. Therefore, the LMFs would not be a source of localized TACs. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.13.16 0554

The comment (1) identifies several SCAQMD rules potentially applicable to the project and (2) notes SCAQMD's potential role as a CEQA responsible agency for the project.

Regarding potentially applicable SCAQMD rules, Draft EIR/EIS Section 3.3.2.3, Regional Air Basin Plans and Policies, lists several of the cited rules. The Authority has revised the Draft EIR/EIS to include additional cited potentially applicable SCAQMD rules. Refer to Final EIR/EIS Section 16.5.3 for these revisions. Inclusion of these additional SCAQMD rules does not change any of the project's air quality impact conclusions or require new or revised additional mitigation measures. The project would be required to comply with all applicable SCAQMD rules.

Draft EIR/EIS Chapter 1, Project Purpose, Need, and Objectives, identifies SCAQMD as a CEQA responsible agency. The Authority has coordinated extensively with SCAQMD in preparing the Draft EIR/EIS and General Conformity determination. The Authority acknowledges SCAQMD's understanding of its role as a responsible agency under CEQA.

22.13.17 0555

This comment requests that the Authority review Chapter 5 of the East Los Angeles, Boyle Heights, and West Commerce; South Los Angeles; and Southeast Los Angeles Community Emissions Reduction Plans (CERP), and incorporate any additional feasible mitigation measures or project design features to further reduce air pollution–related impacts and support implementation of the adopted CERPs in these communities.

Chapter 5c of the East Los Angeles, Boyle Heights, and West Commerce CERP and Chapter 5f of the Southeast Los Angeles CERP discuss actions to reduce air pollution emissions or exposures from railyards and locomotives. As discussed in Section 6.3.2 of the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report*, the LMF would be used for train storage, examinations in service, and inspections. The LMFs would not include operation of any diesel-fueled engines, or other sources of TAC emissions. The HSR trainsets that would operate through the Hobart and Commerce Yards would be fully electric and would also not be a source of TAC emissions. Therefore, because the Authority-controlled operational activities within Hobart and Commerce Yards would not be a source of TAC emissions, there are no actions from Chapter 5C from the East Los Angeles, Boyle Heights, and West Commerce suitable for incorporation.

Unlike the East Los Angeles, Boyle Heights, and West Commerce and Southeast Los Angeles CERPs, the South Los Angeles CERP does not include a chapter on railyards and locomotives. However, the South Los Angeles CERP includes Chapter 5B: mobile sources and Chapter 5D: general industrial facilities. Consistent with the goals of the South Los Angeles CERP of reducing mobile-source and general industrial facilities emissions, the Draft EIR/EIS includes AQ-MM#2, which requires that a minimum of 25 percent, with a goal of 100 percent, of all light-duty on-road vehicles used by all project construction contractors (e.g., passenger cars, light-duty trucks) associated with the project (e.g., on-site vehicles, contractor vehicles) use ZE or near-ZE technology. Implementation of this measure would reduce mobile-source emissions in South Los Angeles and would be consistent with Chapter 5B Goals A, B, and E.

Furthermore, as discussed in Draft EIR/EIR Section 3.3, Impact AQ-8, construction of the project would not expose nearby sensitive receptors to a cancer or noncancer chronic hazard risk that would exceed the SCAQMD-adopted thresholds. For Chapter 5D, there are no applicable goals or actions, because the proposed LMFs would not be a source of TAC emissions. The Authority would also implement AQ-MM#3, Reduce the Potential Impact of Stationary Sources, to reduce potential stationary-source emissions. Finally, all Authority-related activities would be required to comply with all federal and state regulatory requirements.

Therefore, there are no additional feasible mitigation measures or project design features that could be identified and implemented during future project-level approvals to further reduce air pollution impacts and support implementation of the adopted CERPs in these communities. The air quality discussion from Draft EIR/EIS Section 3.19, Cumulative Impacts, has been revised to include the above analysis of the applicable CERPs. Refer to Final EIR/EIS Section 16.5.19 in Chapter 16 for these changes.

22.13.18 0556

This comment recommends that the Authority provide additional analysis and disclosure regarding localized and cumulative air quality and health risk impacts on Assembly Bill 617–designated communities. As noted in response to comment #0555 above and discussed in Draft EIR/EIS Section 3.3, Impact AQ-8, project construction would not expose nearby sensitive receptors to a cancer or noncancer chronic hazard risk that would exceed the SCAQMD-adopted thresholds.

This comment also recommends that the Authority include a discussion in the Final EIR/EIS that addresses how the emissions minimization measures and mitigation framework, to the extent feasible and enforceable under CEQA, would be consistent with the air quality priorities identified in the adopted CERPs for the East Los Angeles, Boyle Heights, and West Commerce; South Los Angeles; and Southeast Los Angeles communities and would reduce cumulative impacts in these affected communities.

Please refer to the response to comment #0555 above for the Authority's review of the adopted CERPs for the East Los Angeles, Boyle Heights, and West Commerce; South Los Angeles; and Southeast Los Angeles, and how AQ-MM#2 and AQ-MM#3 would be consistent with the air quality priorities.

For additional information regarding how DPM emissions associated with operations will be evaluated and addressed, including through the operational HRA required by mitigation measure AQ-MM#4, refer to the response to comment #0541 above.

Regarding the regulation of activities by third-party freight operators, refer to the response to comment #0543 above.

Regarding the prospective cumulative consideration of operational HRA results (from AQ-MM#4), refer to the response to comment #0547 above.

22.13.19 0557

The Authority acknowledges SCAQMD's comments and the cited response requirements set forth in the California Public Resources Code. The Authority has continued coordination with SCAQMD through the development of the Final EIR/EIS, including responses to comments. This comment does not address the sufficiency of the Draft EIR/EIS, nor does it suggest edits to the document; accordingly, no changes have been made to the document in response to this comment.

Los Angeles to Anaheim - RECORD #013796 DETAIL

Status:	Action Pending
Record Date:	02/02/2026
Interest As:	Local Agency
Full Name:	Zulema Renteria

Stakeholder Comments/Issues:

0506 Hello, I am the Environmental Planning Specialist in the Office of Environmental Health and Safety at LA Unified. I am requesting an electronic copy of the EIR for the Los Angeles to Anaheim project for us to submit a comment letter. Thank you, Zulema J Renteria Environmental Planning Specialist Los Angeles Unified School District Office Phone (213) 241 3432 Cell Phone (213) 792 7579 Email zulema.renteria@lausd.net 333 South Beaudry Avenue, 21st Floor Los Angeles, CA 90017

22.14 Response to Submission 013796 (Zulema Renteria, Los Angeles Unified School District Office of Environmental Health and Safety, Feb 2, 2026)

22.14.1 0506

The California High-Speed Rail Authority contacted the commenter on February 2, 2026, and provided the requested information. 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 #013797 DETAIL

Status:	Action Pending
Record Date:	02/02/2026
Interest As:	Local Agency
Full Name:	Brian Jacob

Stakeholder Comments/Issues:

Hello - please see the attached comments to the draft EIR/EIS for the Los Angeles to Anaheim Project Section submitted on behalf of the Southern California Regional Rail Authority (SCRRA or Metrolink). Thank you, Brian Jacob Planning Manager II

METROLINK

California High-Speed Rail Authority (CHSRA)
Attn: Lijia Zhang, PE, PMP
770 L Street, Suite 800
Sacramento, CA 95814

February 2, 2026

Re: Los Angeles to Anaheim Project Section Draft Environmental Impact Report / Environmental Impact Statement (EIR/EIS)

Dear Mr. Zhang:

0534 Thank you for the opportunity to review the Los Angeles to Anaheim Project Section Draft Environmental Impact Report / Environmental Impact Statement (EIR/EIS) for the California High-Speed Rail (CHSR) Project, Los Angeles to Orange County segment. In addition to the comments provided below, the Southern California Regional Rail Authority (SCRRA) encourages CHSRA to continue its engagement, coordination, and collaboration with our team as the project advances. Given the regional importance of the Los Angeles-Anaheim corridor, maintaining communication and a cooperative working relationship will continue to be essential to ensuring the successful construction and implementation of the project while minimizing operational impacts, and maximizing the shared benefits for Southern California's transportation system.

SCRRA offers the following comments to the draft EIR/EIS:

- **Impacts to Metrolink Operations and Projects:** In addition to ensuring the preservation of Metrolink's operational service along the corridor, SCRRA has an interest in a number of projects either along or adjacent to the corridor that will require continued coordination with CHSRA, including, but not limited to, the Link Union Station project, proposed South Island Platforms at the Buena Park and Norwalk stations, and a planned Los Angeles southside turn facility.

0535
- **Commerce Flyover:** SCRRA continues to have some concerns with the design of the Commerce Flyover, which we understand is being developed separately. These concerns include the elimination of an at-grade Main Track 3 and the implications of that for construction phasing. As has been demonstrated with recent operational challenges, the corridor cannot be operated properly with only two tracks for all existing tenant operating railroads. Design of the Commerce Flyover should ensure at least 3 tracks are available during the entire construction period.

0536

- **Buena Park:** The public policy outreach process for a potential relocation of the Buena Park station does not appear to have been undertaken. SCRRA understands that the proposed new location could provide improved customer access and transit connectivity, but also would have trade-offs. SCRRA recommends that CHSRA conduct a station relocation study in collaboration with Orange County Transportation Authority, the City of Buena Park, and SCRRA.

0537

- **Fullerton Interlocker Project:** SCRRA requests Chapter 2, section 2.6.5.3 be amended to accurately reflect the features and status of the Fullerton Interlocker project. Given the early stages of design for the project and passenger access being considered as part of the environmental process, the project description of the Fullerton Interlocker Project needs to be updated to accurately reflect the project elements. Specifically, the statement found in the third paragraph of section 2.6.5.3 should be revised as follows: "All other modifications would be included: the removal or reconstruction of the existing southern side platform, addition of a new center platform, either new bridges or modifications to existing bridges over Harbor Boulevard and Lemon Street, pedestrian access reconfiguration including the construction of new pedestrian overpass, the potential to retrofit the existing overpass, or addition of a new underpass, and realignment and modifications to Walnut Avenue". The Fullerton Interlocker Project will be evaluated in a separate CEQA environmental document.

0538

- **Redondo Flyover:** Given that the Redondo Flyover (Metrolink Bridge No. 143.13) will be shared by CHSRA and Metrolink, a full analysis of the existing structure and suitability of installing catenary systems on the bridge is necessary. Please note that this is a 35-span bridge, with each span having varying conditions and structure types. Any recommended improvements would need to be the responsibility of CHSRA.

Should you have any questions, please feel free to contact Roderick Diaz at (213) 452-0455 or via e-mail at DiazR@scrra.net.

Sincerely,

Paul R Hubler

Paul Hubler
Chief Strategy Officer
Southern California Regional Rail Authority

22.15 Response to Submission 013797 (Brian Jacob, Southern California Regional Rail Authority, Feb 2, 2026)

22.15.1 0534

The California High-Speed Rail Authority (Authority) appreciates the Southern California Regional Rail Authority's (SCRRA) collaboration on the project and interest in nearby or adjacent projects, and will continue to work with SCRRA as the designs advance.

22.15.2 0535

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18, Standard Responses.

Regarding construction of the Commerce Flyover specifically, the majority of the Commerce Flyover structure would be built outside the existing right-of-way or offset from the existing mainline tracks, and construction would be phased in a way so that three mainline tracks would be maintained at all times during construction. BNSF Railway (BNSF) has developed preliminary staging plans based on the current design, with an option of converting an existing lead track into a mainline track and shifting two existing mainline tracks to provide clearance for the viaduct construction. At the final stage of construction, the tracks would be connected to both ends of the completed tracks on the structure. The Authority will continue to work with BNSF and all operators to refine the staging plans to reflect current conditions within the corridor.

No revisions have been made to the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) in response to this comment.

22.15.3 0536

The Authority has discussed the relocated Buena Park Metrolink Station with the City of Buena Park and Orange County Transportation Authority, and conducted a station relocation study that included outreach, summarized in Appendix 2-C, Buena Park Metrolink Station Relocation and Commerce Metrolink Station Relocation Analysis, of the Draft EIR/EIS. The Authority has shared updated designs with Buena Park's city staff at key project milestones, with feedback from city staff leading to the identification of the relocation site that was ultimately selected. The Authority also hosted public outreach opportunities to share information specifically about the station footprint in Buena Park, with in-person community meetings in 2015, 2017, and 2018, as well as virtual scoping meetings in 2020. Therefore, the Authority's station relocation analysis sufficiently evaluated alternatives and considered input from stakeholders. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.15.4 0537

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

22.15.5 0538

The Authority will conduct detailed structural analyses in future phases of design to ensure that the catenary system can be safely installed on the structure. The Authority acknowledges responsibility for improvements proposed as part of the high-speed rail project.

Los Angeles to Anaheim - RECORD #013800 DETAIL

Status:	Unread
Record Date:	02/02/2026
Interest As:	Elected Official
Full Name:	Jeff Boynton

Stakeholder Comments/Issues:

0507 Good morning: In La Mirada, are parcel numbers 7001-009-001, 7001-009-016, 7001-009-024 proposed to be full acquisitions? It appears they will be affected by the Project due to Temporary Construction Easements. Is it because the length of time for the construction easements is so extensive that the CHSRA is proposing these parcels be considered full acquisitions (as shown in Volume 3.1 ROW Maps) or is there another reason? Thank you, Jeff Boynton City Manager of La Mirada

22.16 Response to Submission 013800 (Jeff Boynton, City of La Mirada, Feb 2, 2026)

22.16.1 0507

To accommodate construction needs in this area, parcels 7001-009-001, 7001-009-016, and 7001-009-024 are proposed to be fully acquired. The existing Alondra Avenue roadway overpass would be reconstructed, which necessitates a construction staging and laydown area. To avoid potential displacement of other adjacent residential uses and utility facilities in this area, parcels 7001-009-001, 7001-009-016, and 7001-009-024 were selected as being the most suitable. At this current level of design, the California High-Speed Rail Authority has identified these parcels as full acquisitions. The Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) is intentionally conservative and assumes the entire parcel would be affected to analyze all potential impacts, but the construction contractor would have discretion in finalizing construction staging and laydown locations during final design. Once construction is complete, temporarily acquired parcels may be returned to the previous owner or redeveloped with a new business or use.

No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013801 DETAIL

Status:	Action Pending
Record Date:	02/02/2026
Interest As:	Local Agency
Full Name:	Zulema Renteria

Stakeholder Comments/Issues:

0468 Hi, my name is Zulema Renteria calling from Los Angeles Unified School District. I'm with the Office of Environmental Health and Safety. I'm calling to request the Transportation Technical Report for the high-speed rail project from Los Angeles to Anaheim. It hasn't been publicly posted to your website yet. If you could please send that to my email at zulema.renteria@lasd.net, or give me a call back when you get a chance to this number, 213-241-3432. It would be greatly appreciated. Thank you, bye.

22.17 Response to Submission 013801 (Zulema Renteria, Los Angeles Unified School District Office of Environmental Health and Safety, Feb 2, 2026)

22.17.1 0468

The California High-Speed Rail Authority contacted the commenter on February 2, 2026, and provided the requested information. 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 #013808 DETAIL

Status:	Action Pending
Record Date:	02/02/2026
Interest As:	Local Agency
Full Name:	Jeff Boynton

Stakeholder Comments/Issues:

0979 California High-Speed Rail Authority: Thank you for the opportunity to comment on the Los Angeles to Anaheim Draft EIR/EIS document. For more than 20 years, the City of La Mirada has provided various comments/concerns on the proposed high-speed rail project (Project) as a member of regional organizations, such as the Gateway Cities Council of Governments and Los Angeles County Metropolitan Transportation Authority, and on its own. The City's concerns have generally remained consistent during this time: prevent sound and vibration impacts on nearby residential areas; limit property acquisitions and construction impacts to the greatest extent possible; and provide decorative walls, landscaping, and other attractive screening materials to prevent visual blight from the rail corridor, including new equipment and utilities required by the

0980 Project. The City routinely receives complaints from residents regarding noise and vibration impacts from existing rail operations within the BNSF Railway Corridor. The City is concerned that high-speed rail operations will generate additional noise and vibration impacts on the residents. Noise impacts should be mitigated to a level of insignificance. Further, the City requests masonry block walls to be installed along the entire length of the high-speed rail corridor's northern boundary. Or, as an alternative, on the north side of Stage Road adjacent to the existing residential properties. Reimbursement or credit to property owners for

0981 sound attenuation home improvements, such as double-pane windows, should also be given consideration. It should be noted the environmental documents appear to show a gap in the proposed wall structure at SBN 990+00 and SBN 991+00. This section is across from Crosswood Lane along Stage Road. To provide consistency with the wall design, ensure safety, and reduce noise impacts as much as possible, no gap should be present in the wall structure. As stated previously, it is the City's interest that a masonry block

0982 sound wall be constructed along the corridor's northern boundary. The environmental documents identify proposed impacts on property owned by the City, local businesses, and utilities. To limit the economic impacts on local businesses and the City, any property acquisitions and/or easements should be limited to the greatest extent possible. The City also requests clarity of the effects of the Project on commercial parcels 7001-009-001,7001-009-016, and 7001-009-024, and the plans for these parcels after the Project is completed. Further, the City requests to limit the Project's impact on the existing cell tower located on City property (7001-010-909), as it is a critical piece of communications infrastructure and a source of revenue for

0983 the City. The negative aesthetic impacts associated with the Project are of great concern. The City requests overhead utilities, vertical equipment, and other elements to be obscured from the public right-of-way regardless of grade differential. Structural elements should be attractively designed and reflect a high standard of architectural elements and detail. All equipment should be maintained in good repair and visual appeal for the Project's entirety. Additionally, permanent landscaping should be added to soften the impact of

0984 the Project on the local community. I have attached a previous letter from the City to the CHSRA dated August 31, 2009, expressing some of the City's earliest comments on the Project. While CHSRA's alternatives are now clearly identified, many of the City's concerns with the Project expressed in that letter remain applicable. Thank you for your consideration of the City's comments. Sincerely, Jeff Boynton City Manager City Hall 13700 La Mirada Boulevard La Mirada, CA 90638 (562) 943-0131 www.cityoflamirada.org

CITY OF LA MIRADA
DEDICATED TO SERVICE

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August 31, 2009

Bruce W. Armistead
Regional Manager
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, California 95814

SUBJECT: PRELIMINARY COMMENTS - HIGH SPEED RAIL PROJECT

Dear Mr. Armistead:

This letter presents preliminary comments by the City of La Mirada on the proposed development of a rail transportation system by the California High Speed Rail Authority. Additional comments will be submitted at such time as detailed project information is made available to the City of La Mirada.

The following categories represent the minimum countermeasures for addressing project alternatives and mitigation to minimize impacts associated with the proposed California High-Speed Rail Project (Project) through La Mirada.

The following sources were used to assist with drafting alternative recommendations and mitigation measures.

- Mitigation of Track and Ground Vibration by High Speed Trains at Ledsgard, Sweden, 2002.
- California High Speed Rail Project Program Summary Report, July 10, 2009.
- Cost-Effective GHG Reductions Through Smart Growth & Improved Transportation Choices, Center for Clean Air Policy, June 2009.
- Discussions with staff of the Metro, Gold Line Foothill Extension Construction Authority, August 25, 2009.

ALTERNATIVES

Project Alternatives: Transportation Systems

The California High-Speed Rail Authority (Rail Authority) has not adequately presented Alternative Transportation Systems for the City to evaluate and provide recommendations. Given the proposed rail system and route south of Stage Road which is directly adjacent to single-family dwellings, the City has serious concerns regarding the potential negative impacts that the high speed rail system would have on

SUSAN TRIPP Mayor | PETE DAMES Mayor Pro Tem | GABRIEL P. GARCIA Councilmember | STEVE JONES Councilmember | HAL MALKIN Councilmember | THOMAS E. ROBINSON City Manager

adjacent residential dwellings. In the City's opinion, the alternative analysis has not adequately considered other transportation systems or routes that may be better suited in achieving the transportation goals while reducing the negative effects on already established uses that encompass sensitive receptors.

Land Use Alternatives: Train Route
The proposed Stage Road route is not consistent with the City's long term land use plan. Alternatively, the I-5 Freeway Corridor is identified for future high density mixed use and heavy regional commercial uses, thereby making it a more appropriate route. The existing rail line south of the I-5 Freeway is located within a redevelopment project area and the corridor is zoned for both Regional Commercial and Industrial uses.

Given the future I-5 Freeway expansion, the proposed project has the potential to be combined with the I-5 widening and increase the potential regional benefit that can be produced, i.e., TOD (Transit Oriented Development) District; Speed Rail Station; promoting land use sustainability measures and smart growth in accordance with SB 375. In a report by the Center for Clean Air Policy Transportation and Climate Change Program, prepared by the Center for Clean Air Policy, June 2009, the study cites that "Combining Smart Growth and Transportation Planning Can Yield Strong Economic Benefits". Given the strategic location of both the I-5 Corridor and the existing BNSF Metrolink rail line, the I-5 Corridor alignment better meets the principles of both sustainable development and smart growth advocated in the report and La Mirada strategic planning objectives.

Land Use Alternatives: SCAG's Regional Transportation Plan (RTP)
The City's future land use planning is required to be consistent with SCAG's RTP land use policies and Vehicle Miles Traveled (VMT) measures in accordance with SB 375 legislation. In staff's opinion, the Project has failed to address whether it is consistent with the RTP and the City's General Plan, and strategic planning transportation, and circulation objectives to meet Green House Gas (GHG) target reductions levels. The Project's Alternatives Analysis should identify how it is responsive with the City's and region's RTP objectives and goals.

Land Use Alternatives: La Mirada Train Station
The Rail Authority should explore opportunities to consider the establishment of a High Speed Rail Train station on the I-5 Corridor.

MITIGATION

Planning Mitigation: Liquefaction
The Rail Authority shall provide mitigation in accordance with findings and analysis prepared by a licensed geotechnical engineer identifying how the project and adjacent

areas will not be impacted by liquefaction. A portion of the rail line is located within a liquefaction hazard as per the General Plan, figure SCS-2.

Planning Mitigation: FEMA Flood Zone
The Rail Authority shall provide mitigation in accordance with findings and analysis prepared by a licensed geotechnical and hydrology engineer identifying how the project will not be affected by flood hazards. A portion of the rail line is located within a flood hazard zone as per the General Plan, figure SCS-3 and the FEMA Flood Insurance Rate Map dated September 26, 2008.

Planning Mitigation: Community Noise Equivalent Level (CNEL) Contours
The Rail Authority shall conduct ambient noise tests to determine whether existing CNEL levels are adequate to mitigate noise impacts from high-speed rail within residential neighborhoods north of Stage Road. A report by a licensed or certified acoustical engineer regarding the findings shall be submitted to the City for review and consideration.

Engineering Impacts: Traffic Safety and Congestion Impacts
The Rail Authority shall design its system so as to ensure the safety of the motoring public and to avoid contributing to traffic congestion in the City during construction, operation and maintenance of the rail system.

Engineering Impacts: Land Remnants
The Rail Authority shall dedicate all remnant parcels to the City as required by the City. All parcels subdivided as a result of the project shall be subdivided and recorded in accordance with the City's Subdivision Map Act and Los Angeles County Department of Public Works (LACDPW) subdivision procedures.

Engineering Impacts: Easements
The Rail Authority shall dedicate, as necessary, easements for utilities, roads, ingress and egress, and rights of way as required by the LACDPW Engineer.

Engineering Impacts: Utilities
All above ground utilities affected by project shall be installed under grounded as per City specifications and requirements.

Engineering Impacts: Displacement
The Rail Authority is responsible for underwriting the cost the City incurs for any construction, damages, etc. that may result from the project.

Source Vibration: Train
Source vibration emitted as a result of train axle configuration, spring connections to the engine, passenger cars, braking, positive or centrifugal acceleration, such as when a

train passes curves or through a grade separation shall not produce source vibrations that exceed shaking standards established by the Federal, State and other responsible transportation approving authorities. The Rail Authority shall demonstrate that Source Vibration impacts have been mitigated in accordance with high-speed rail engineering methods, standards and requirements.

Source Vibration: Tracks
Track vibration shall adhere to standards established by Federal, State and other responsible transportation approving authorities. The Rail Authority shall demonstrate that Track Vibration impacts have been mitigated in accordance with high speed rail engineering methods, standards and requirements.

Source Vibration: Railway Infrastructure
Railway infrastructure vibration, resonance, or echo shall adhere to standards established by Federal, State and other responsible transportation approving authorities. The Rail Authority shall demonstrate that Railway Infrastructure Vibration impacts have been mitigated in accordance with high-speed rail engineering methods, standards and requirements. Prior to commencement of operations, the Rail Authority shall demonstrate that actual train tests demonstrate that the mitigation has minimized source vibration effects.

Medium Vibration: Soil and Sedimentation
Medium vibration resulting from soil induced train vibration shall not exceed Federal, State and other responsible transportation approving authorities. The Rail Authority shall demonstrate that soil vibration impacts have been mitigated in accordance with high-speed rail engineering methods, standards and requirements. The Rail Authority shall ensure as to the geotechnical soil compatibility of the corridor to verify that the rail bed is designed in accordance with engineering standards and methods to mitigate vertical, lateral and oblique soil medium vibration impacts.

Object Vibration: Buildings, Equipment, Corridor Hardware and Structures
The Rail Authority shall mitigate vibration and resonance impacts to all adjacent residential, commercial and industrial structures resulting from Object Vibration impacts. Object vibration shall not exceed the standards established by Federal, State and other responsible transportation approving authorities. The Rail Authority shall ensure as to the structural integrity of mechanical, structural and other rail and train infrastructure to mitigate object vibration to adjacent structures. This includes high-speed rail passing, overtaking, running parallel, or cruising past parked or stopped high speed rail trains, freight, passenger or any other railroad engine system. The Rail Authority shall demonstrate that Railway Infrastructure Vibration impacts have been mitigated in accordance with high-speed rail engineering methods, standards and requirements.

Vibration: Structural Damages
The Rail Authority shall be responsible for replacing and/or repairing damages to residential, commercial, industrial and public structures and facilities situated along the rail corridor that resulted from construction, operation, maintenance and/or other known/unknown effects of the rail system. The Rail Authority shall indemnify the City from all legal actions and lawsuits brought against the City as a result of damages.

Environmental Vibration: Subsonic Waves
The Rail Authority shall mitigate train induced vibrations, noise, resonance, echo and air waves propagated by the effects of high velocity, acceleration, braking, alternating changes in speed, etc., arising from the changes in topography, weather, adjacent structures, and/or overtaking, running parallel, cruising past parked, stopped or slow moving high speed rail trains, freight, passenger, or any other railroad engine system situated on the track. The Rail Authority shall ensure that compressional (P); shear (S) and Rayleigh (R) waves shall not produce a wave energy phenomenon that exceeds standards imposed by federal, state or other responsible transportation agency with oversight on this project. The Rail Authority shall demonstrate that Subsonic Impacts shall be mitigated in accordance with high-speed rail engineering methods, standards and requirements.

Noise Impacts: Rail System
The Rail Authority shall mitigate train, mechanical, soil and air induced noise impacts arising from the operations of high-speed rail. Noise impacts shall not exceed the City's CNEL levels in residential, commercial and industrial zoned districts. Noise resulting from maintenance, repairs, bells, whistles, alarms, crossing guards, public announcement systems, or other such equipment associated with the high speed rail system currently not in place shall not create noise impacts that exceed the City's required CNEL levels. The Rail Authority shall demonstrate that Rail System noise impacts have been mitigated to a level of insignificance and meet the City's CNEL and ambient noise standards in accordance with high-speed rail noise methods, standards and requirements.

Noise Impacts: Construction
The Rail Authority shall adhere to the City's noise levels during construction operations. The Rail Authority shall adhere to the City's CNEL noise levels in all adjacent Zoning Districts along the rail corridor. Noise levels shall be mitigated to a level of insignificance. The Rail Authority shall demonstrate that construction noise impacts are maintained in accordance with the City's ambient noise requirements. Rail Authority shall provide and maintain contact information for City staff, public safety personnel, and for members of the public requesting contact information. The Rail Authority shall respond to and address all noise construction complaints, and maintain a log of such contacts and actions.

Noise Impacts: Maintenance
The Rail Authority shall adhere to the City's noise levels during maintenance operations. The Rail Authority shall adhere to the City's CNEL noise levels in all adjacent Zoning Districts along the rail corridor. Maintenance noise levels shall be mitigated to a level of insignificance. The Rail Authority shall demonstrate that maintenance noise impacts are maintained in accordance with the City's ambient noise requirements. The Rail Authority shall provide and maintain contact information for City staff, public safety officers, and for residents requesting contact information. The Rail Authority shall respond and address all noise maintenance complaints and maintain a log of such contacts and actions.

Economic Impacts
The City shall require an opportunity to assess all potential negative impacts on the environment and economy of the City of La Mirada resulting from the construction, operation and maintenance of the proposed high speed rail system.

Aesthetic Impact: Overhead Electrical
No overhead electrical lines required for train propulsion, communication, or otherwise shall be installed vertically above the tracks and train. All electrical propulsion devices, equipment, and accoutrements shall be "view obscured" from the public right-of-way regardless of grade differential.

Aesthetic Impact: Structural Architecture
Structural elements shall be attractively designed and incorporate images or reliefs approved by the City. All overhead rail structures shall incorporate a high standard of architecture elements and detail.

Aesthetic Impact: Sound Bearing Walls
All sound attenuating masonry block walls and barrier block walls shall adhere to the City's block wall design requirements. Walls shall be constructed of decorative split face masonry block and capped with a finished cap. Walls shall incorporate relief features such as decorative columns, arched curvilinear or geometric configurations.

Aesthetic Impact: Equipment
All equipment associated with the train shall be view obscured from the public right-of-way or located behind or within decorative walls and/or enclosures.

Aesthetic Impact: Lighting and Signals
In accordance with rail safety design requirements, all light poles, signals, and lighted overhead structures shall be decoratively designed.

Safety Mitigation: Security
The Rail Authority shall maintain current emergency contact numbers of Authority personnel on file with the City Public Safety Department, Fire, Public Works, and Administration.

Safety Mitigation: Property Maintenance
The following nuisances shall be mitigated within a 24 hour period: Graffiti; Debris; and, Mechanical fluids.

Safety Mitigation: Seismic
The Rail Authority shall ensure that raft Infrastructure is designed in accordance with engineering standards that withstand seismic movements and ground shaking.

Safety Mitigation: Permits
The Rail Authority shall submit improvement plans for City staff review when future changes or modifications to the Project are proposed. No permit will be required but the plans will be recorded and logged. The Rail Authority shall notify the City's Public Works Director and City Building Inspector when the improvement work is completed.

Reservation of Rights
Nothing in this letter shall be construed or inferred to provide any consent or approval to the proposed project of the California High Speed Rail Authority. The City of La Mirada has neither received, nor had an opportunity to review, adequate reports, plans, specifications and related materials concerning the impacts of the proposed high speed rail project. As a result, the City reserves its right to review and comment on all such material in the future to ensure that the provisions of the California Environmental Quality Act are complied with, and that appropriate mitigation efforts are employed to protect the interests of residents and business In the City of La Mirada.

Should you have any questions and/or comments regarding the City of La Mirada's preliminary comments on the proposed High Speed Rail Project, please feel free to contact Mr. Steve Forster, Public Works Director at (562) 943-0130.

Sincerely,

CITY OF LA MIRADA

Thomas E. Robinson
City Manager

cc: Alex Clifford, Metropolitan Transportation Authority
Fred Latham, City of Santa Fe Springs

22.18 Response to Submission 013808 (Jeff Boynton, City of La Mirada, Feb 2, 2026)

22.18.1 0979

The California High-Speed Rail Authority (Authority) appreciates the City of La Mirada's communication and collaboration on the high-speed rail (HSR) project and will continue to work with the City of La Mirada as design work advances. The Draft Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS) addresses the topics of noise and vibration, property acquisition, and aesthetics and visual quality in the following sections, respectively: Section 3.4, Noise and Vibration; Section 3.12, Socioeconomics and Communities; and Section 3.16, Aesthetics and Visual Quality. These sections also include mitigation measures that would reduce potential impacts during construction and operation of the project. No revisions to this Draft EIR/EIS have been made in response to this comment.

22.18.2 0980

As discussed in Section 3.4.4, Methods for Evaluating Impacts, of the Draft EIR/EIS, the Authority used both current Federal Railroad Administration (FRA) and Federal Transit Administration (FTA) manuals to assess the potential noise and vibration impacts and necessary mitigation measures for the HSR project. The Draft EIR/EIS proposes sound barriers in areas of severe noise impacts resulting from the project, where the barriers meet the cost-effectiveness criteria consistent with the Authority's Noise and Vibration Mitigation Guidelines (refer to Draft EIR/EIS Appendix 3.4-A, Noise & Vibration Mitigation Guidelines). The Authority would refine mitigation for individual homes with residual severe noise impacts (i.e., severe impacts that remain after provision of sound barriers) and address them on a case-by-case basis. These types of measures may include improvements to the building structure itself such as installing acoustically treated windows, extra insulation, and mechanical ventilation as detailed in Section 3.4.7.3, N&V-MM#3: Implement California High-Speed Rail Project Noise Mitigation Guidelines, of the Draft EIR/EIS. However, because no potential noise or vibration impacts from project operations were identified in La Mirada, mitigation measures are not proposed in the city. It should also be noted that there are existing walls adjacent to most of the residential properties along the north side of Stage Road.

22.18.3 0981

The proposed wall structure was designed based on engineering requirements as a retaining wall rather than a soundwall. As described in the response to comment #0980 above, no noise impacts from project operations were identified in La Mirada and noise mitigation measures are not required. It should also be noted that there are existing walls adjacent to most of the residential properties along the north side of Stage Road.

22.18.4 0982

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18, Standard Responses.

To accommodate construction needs in this area, parcels 7001-009-001, 7001-009-016, and 7001-009-024 are proposed to be fully acquired. The existing Alondra Avenue roadway overpass would be reconstructed, which necessitates a construction staging and laydown area. To avoid potential displacement of other adjacent residential uses and utility facilities in this area, parcels 7001-009-001, 7001-009-016, and 7001-009-024 were selected as being the most suitable. At this current level of design, the Authority has identified these parcels as full acquisitions. The Draft EIR/EIS is intentionally conservative and assumes the entire parcel would be affected to analyze all potential impacts, but the construction contractor would have discretion in finalizing construction staging and laydown locations during final design. Full acquisitions were identified based on preliminary design where a substantial portion of a property's primary dwelling or business structure would be required for the HSR right-of-way or occupied for an extended duration during construction. In addition, properties could be considered full acquisitions where structures would remain intact but acquisition of essential elements necessary for the property's intended use—such as parking, access, or

operational open space—would preclude continued viable use. Consistent with standard practice, final determinations regarding full versus partial acquisitions would be made on a case-by-case basis during the land acquisition phase, based on detailed design and site-specific conditions. Parcel 7001-010-909 is identified for a proposed radio tower site, which is depicted in Volume 3.4, sheet CO-F1091. The location of the proposed radio tower and access road on the parcel does not conflict with the location of the City of La Mirada's existing cell tower.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.18.5 0983

The commenter expresses concern regarding potential aesthetic impacts of the project and requests visual screening of utilities and equipment, high-quality architectural design, ongoing maintenance, and permanent landscaping to reduce visual effects. As discussed in Draft EIR/EIS Section 3.16.6.3, Project Impacts, the Authority has considered community context in determining impacts and has incorporated adherence to design standards intended to promote visual cohesion with surrounding land uses. Although overhead utilities and structural elements would increase the visibility of rail elements in some locations, these features would be introduced within an existing transportation corridor and would generally be compatible with the surrounding visual setting. As analyzed in the Draft EIR/EIS, these changes would not substantially degrade visual quality. Design measures AVQ-IAMF#1, Aesthetic Options; and AVQ-IAMF#2, Aesthetic Review Process, together with mitigation measures AVQ-MM#3, Incorporate Design Aesthetic Preferences into Final Design and Construction of Nonstation Structures; and AVQ-MM#4, Provide Vegetation Screening Along At-Grade and Elevated Guideways Adjacent to Residential Areas, require incorporation of Authority-approved aesthetic preferences into final design and construction, coordination with local jurisdictions, and implementation of landscaping and vegetation screening at grade and along elevated guideways adjacent to sensitive land uses. Project infrastructure would also be subject to ongoing operation and maintenance requirements to ensure functionality, safety, and consistency with adopted design standards. No revisions to this Draft EIR/EIS have been made in response to this comment.

22.18.6 0984

The Authority appreciates the City of La Mirada's communication and collaboration on the HSR project since its inception. The Authority has reviewed the provided attachment, dated August 2009. All issues raised in the letter were addressed in the Draft EIR/EIS.

Los Angeles to Anaheim - RECORD #013811 DETAIL

Status:	Unread
Record Date:	02/02/2026
Interest As:	Local Agency
Full Name:	Cesar Roldan

Stakeholder Comments/Issues:

0581 City of Montbello requests that the High-Speed Rial Authority consider relocating the Commerce Metrolink Station to the City of Pico Rivera. The proposed location within the City of Montebello is of high industrial
0582 usage and there are minimal residential parcels located within close proximity of the proposed site. City has concerns regarding the Site Plan of the proposed station in Montebello. Based on the background provided the Metrolink train is using the Northerly tracks within the BNSF ROW. A pedestrian tunnel is provided for access from the parking lot to the loading platform. The concept of a pedestrian tunnel is archaic and a serious safety concern for the following reasons: (A) A Tunnel 100' plus in length would have to be secured against vandals and vagrants. Undesirables would still have access. 24/7 security for pedestrians must be provided. (B) The City does not want to be encumbered with maintenance and security costs for a tunnel. (C) The layout of local streets in this area does not provide good access for law enforcement and other first responders. (D) Maintenance of the Metro station requires additional conversations. (E) Potential economic impacts to the property located at 1550 S. Maple Avenue identified as Los Angeles County Assessor's Parcel No. 6354-024-024 (the "Subject Site") within the City of Montebello. (F) The Subject Site is comprised of one legal lot with a total lot area of approximately 248,195 square feet (or 5.7 Acres). The Subject Site is zoned M-2 (Heavy Manufacturing Zone) and improved with one building totaling 124,286 square feet. The current zoning provides for, among other things, some of the highest and best uses in the City. For example, the following is a summarized list of permitted uses in the M-2 Zone1: (a) Automobile Sales (New and Used), Alcohol Manufacturing, Bottling Plants, Breweries, Building Material Sales, Grocery Store, Hobby Supply Shops and Retail Stores. (b)Based on the above-referenced uses, there is potential for economic impacts to the City of Montebello, should the Subject Site transition into a non-productive economic use to accommodate the proposed project. Additionally, it is unclear whether the project has the potential to impact surrounding
0588 uses. Please note that additional analysis will be required to explore the fiscal impacts related to potential loss of tax revenue (i.e. property tax and sales tax) as well as future revenue associated with allowable uses at the Subject Site.

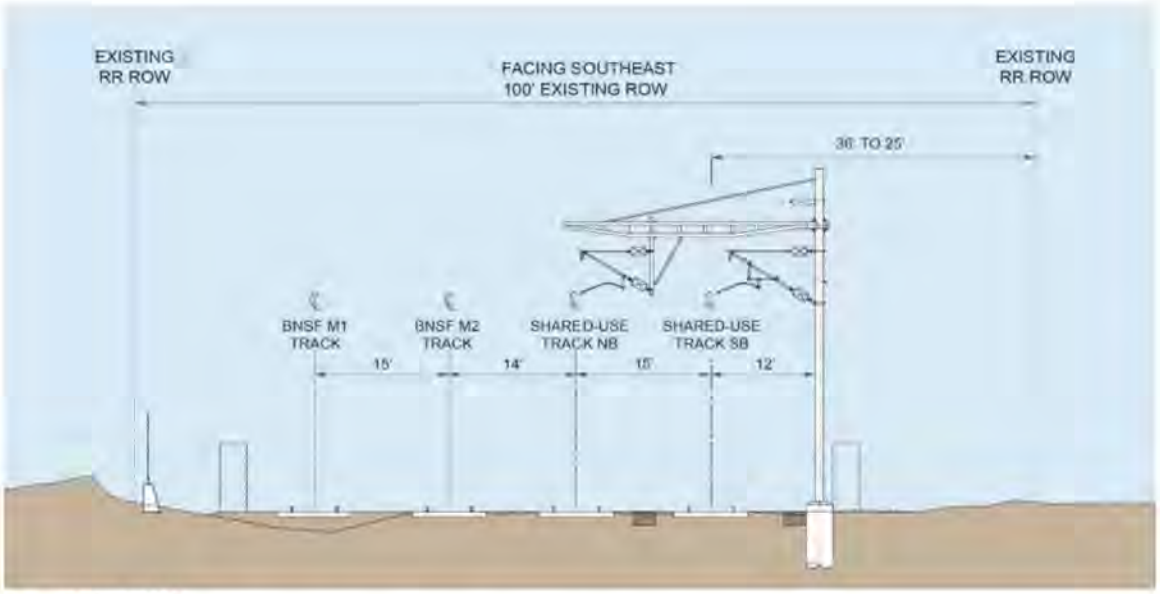
- This Draft EIR/EIS evaluates two locations for an HSR station option, at the Norwalk/Santa Fe Springs Metrolink Station and the Fullerton Metrolink/Amtrak Station. However, neither of these HSR station option locations are included as part of Shared Passenger Track Alternative A or B. – Page | 1-9
- Intercity travel between the Los Angeles-Long Beach-Anaheim MSA, the San Francisco Bay Area, the Central Valley, and Sacramento – Page | 1-15
- Within the Los Angeles-Long Beach-Anaheim MSA, the cities along the project section are Los Angeles, Vernon, Commerce, Bell, Montebello, Pico Rivera, Santa Fe Springs, Norwalk, La Mirada, Buena Park, Fullerton, Anaheim, and Orange. The unincorporated community of West Whittier-Los Nietos is also along the project section in Los Angeles County. – 1-16 | Page
- 2.4.6.2 Traction Power Switching and Paralleling Stations
    - Switching and paralleling stations work together to balance the electrical load between tracks, and to switch power off or on to either track in the event of an emergency. Switching stations (Figure 2-15) would be required at approximately 15-mile intervals, midway between the TPSSs. These stations would need to be approximately 9,600 square eet (120 feet by 80 feet). The Shared Passenger Track Alternatives' footprints include a switching station in Santa Fe Springs and paralleling stations in Montebello and Fullerton.– Page | 2-19
- 2.5.2 Range of Potential Alternatives Considered and Findings
    - Shared Passenger Track Alternative A and Shared Passenger Track Alternative B are approximately 30 miles long, crossing 12 cities including Los Angeles, Vernon, Bell, Commerce, Montebello, Pico Rivera, Santa Fe Springs, Norwalk, La Mirada, Buena Park, Fullerton, and Anaheim, as well as the unincorporated area of Los Angeles County known as West Whittier–Los Nietos. – 2-28 | Page
- Ancillary Features Both alternatives would have the same ancillary features, which include two TPSS sites (in Los Angeles and Anaheim), one switching station (in Santa Fe Springs), two paralleling stations (in Montebello and Fullerton), and two sets of layover tracks (near LAUS and near ARTIC). – 2-58 | Page



Source: Authority 2025

Figure 2-33 Shared Passenger Track Alternative A: Commerce to Pico Rivera Overview

- Continuing east, the tracks would pass the existing Commerce Metrolink Station. Because the shared tracks would be on the elevated structure, they would not connect with the Commerce Metrolink Station at its existing location. Therefore, the Commerce Metrolink Station would be relocated on the mainline tracks at the border of Commerce and Montebello, less than a mile to the east of its current location; refer to Section 2.6.3.5 for more information on the Metrolink Station relocation, which could be completed as an early action project. – 2-70 | Page
- The elevated tracks would rejoin the existing railroad right-of-way and return to grade just before I-5. The four mainline tracks would cross over I-5, Telegraph Road, and Garfield Avenue on the existing railroad bridges. East of Garfield Avenue, the shared tracks would pass the relocated Commerce Metrolink Station, but HSR trains would not stop there. – 2-70 | Page
- The tracks would then enter Montebello, remain at grade, and cross over Greenwood Avenue on an existing railroad bridge. Figure 2-38 depicts the configuration of tracks through Montebello. – 2-70 | Page

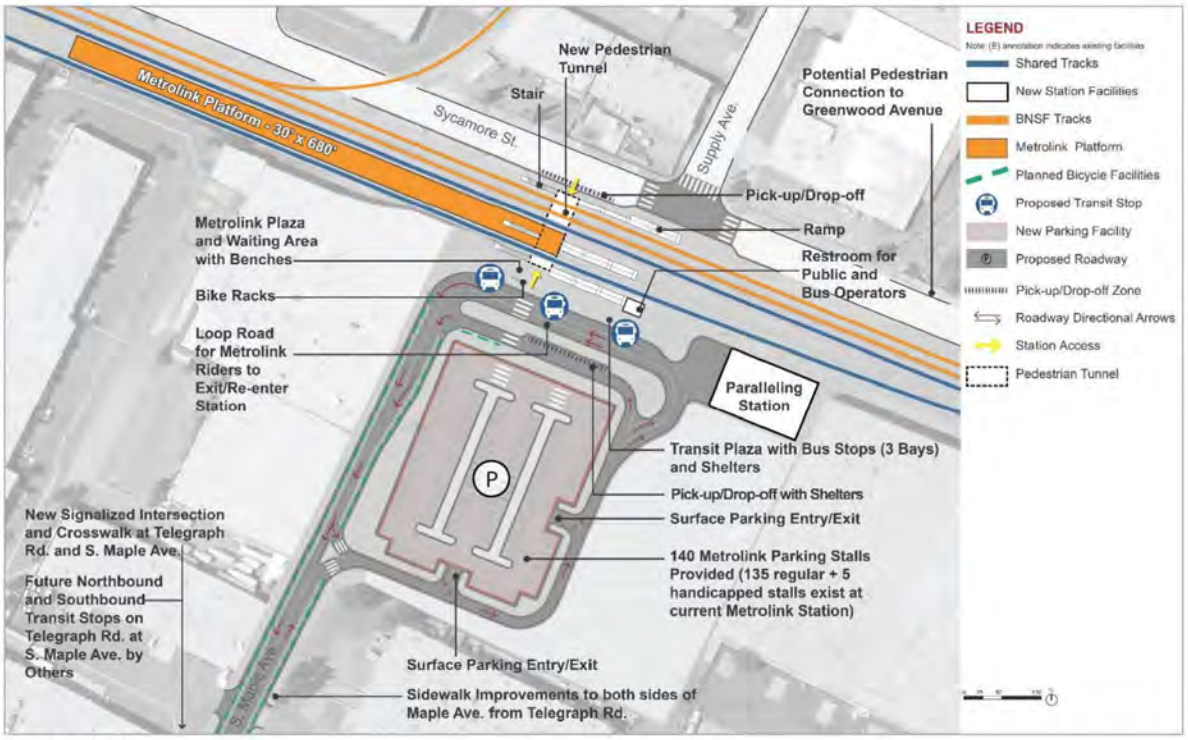


Source: Authority 2025
M = main track; RR = railroad; R/W = right-of-way; NB = northbound; SB = southbound

Figure 2-38 At-Grade Cross Section through Montebello

- A paralleling station would be needed between a TPSS and switching station every 5 miles. Based on the distances between the TPSSs in Los Angeles and Anaheim and the switching station in Santa Fe Springs, two paralleling stations would be needed for the project section; theywould be sited in Montebello and Fullerton. Each paralleling station would need to be approximately 8,000 square feet (generally 100 by 80 feet) in size adjacent to the proposed HSR tracks. The Montebello paralleling station would be co-located with the relocated Commerce Metrolink Station, on the southern side of the corridor. – Page | 2-91
- The relocated Commerce Metrolink Station would serve Metrolink trains only; no HSR trains would stop at this station. An HSR paralleling station would be co-located at the relocated station site; the paralleling station is described in more detail in Section 2.6.3.2. Most of the relocated station would be within Montebello, including the replacement surface parking, plaza, and internal access roads; the platform and nonpublic station facilities north of the railroad corridor would be within Commerce. The relocated station would have a center platform along the southern side of the rail corridor. The platform would be accessible from the north via Sycamore Street via a new pedestrian underpass, and from the south via Maple Avenue, as illustrated by Figure 2-66. The intersection of Sycamore Street and Supply Avenue would be modified with pedestrian crosswalks and the intersection of Telegraph Road and Maple Avenue would have a new signal and crosswalks to provide safe access to the new station location. All the existing station facilities, such as a transit plaza for buses, bicycle parking, vehicle parking, and a pick-up/drop-off area for motorists, would be replaced south of the corridor, to be accessed via Maple Avenue. The new station location would provide 140 parking

spaces for Metrolink passengers, consistent with the number of parking spaces at the existing station location– Page | 2-113



Source: Authority 2025

Figure 2-66 Proposed Relocated Commerce Metrolink Station

Table 2-17 Business and Residential Displacements from Shared Passenger Track Alternative A

City	Businesses Displaced	Residential Units Displaced
Los Angeles County	**178**	**3**
Los Angeles	--	--
Vernon	37	--
Commerce	115	--
Bell	--	--
Montebello	2	--
Pico Rivera	1	--
West Whittier–Los Nietos CDP	--	3
Norwalk	--	--

- Impact TR-5: Temporary Impacts on Pedestrian, Bicycle, and Transit Facilities During Construction. The following transit lines would be affected (grouped by the locations of major project construction elements) – Page | 3.2-87
    - New railroad bridge at Passons Boulevard: Montebello Bus Line 60
- 3.3.2.4 Regional and Local
    - This section discusses relevant regional and local programs, policies, regulations, and permitting requirements. The project section would primarily be within the counties of Los Angeles and Orange and the cities of Los Angeles, Vernon, Commerce, Bell, Montebello, Pico Rivera, Santa Fe Springs, Norwalk, La Mirada, Buena Park, Fullerton, and Anaheim. The city of Orange is also within the RSA. Table 3.3-2 lists local plans and policies that were identified and considered for analysis. – Page | 3.3-29

Policy Title	Summary
City of Montebello	
City of Montebello General Plan, Our Natural Community Element (Conservation, Open Space) (2024)	▪ Policy 1.2: Support regional planning efforts to improve air quality. – Action 1.2: Coordinate air quality planning efforts with local and regional agencies to meet State and Federal ambient air quality standards in order to protect all residents from the health effects of air pollution. ▪ Policy 1.3: Consider emission reduction goals in all major decisions on land use and investments in public infrastructure. – Action 1.3a: Reduce potential GHG emissions from development by encouraging electrification of new developments, promoting energy conservation in existing buildings, plan new development and redevelopment to reduce single-occupancy vehicle miles traveled, and consider green space during development. Coordinate air quality planning efforts with local and regional agencies to meet State and Federal ambient air quality standards in order to protect all residents from the health effects of air pollution. – Action 1.3b: Educate property owners and developers on greenspace inclusion through educational pamphlets, programs, and webpages. ▪ Policy 1.4: Educate businesses and the general public about air quality standards, health effects, and best practices they can make to improve air quality and reduce greenhouse gas emissions. – Action 1.4a: Promote public outreach and education campaigns highlighting the benefits of renewable energy and energy efficiency strategies. – Action 1.4b: Educate property owners and developers on greenspace inclusion through educational pamphlets, programs, and webpages. ▪ Policy 1.5: Coordinate initiatives and regulatory changes with local, regional, and state agencies to reduce motor vehicle emissions. – Action 1.5a: Develop incentives and adopt regulatory standards to reduce transportation emissions. In addition to reducing the number of miles driven, the fuel efficiency and emissions standards of vehicles must also improve. Working in collaboration with Local, Regional, and State agencies, Montebello will seek to increase use of clean fuels in public and private automobile fleets, consider new legislation, and implement educational programs. – Action 1.5b: Promote use of alternate modes of transportation in the City of Montebello, including pedestrian, bicycling, public transportation, car sharing programs and emerging technologies. – Action 1.5c: Invest in low-emission or zero-emission vehicles to replace the City's gasoline powered vehicle fleet and transition to available clean fuel sources such as bio-diesel for trucks and heavy equipment. – Action 1.5d: Encourage the use of low or zero emission vehicles, bicycles, non-motorized vehicles, and car-sharing programs by supporting new and existing development that includes sustainable infrastructure and strategies such as vehicle charging stations, drop-off areas for ride-sharing services, secure bicycle parking, and transportation demand management programs. – Action 1.5e: Require and incentivize projects to incorporate Transportation Demand Management (TDM) techniques. ▪ Policy 1.6: Improve the City's jobs/housing balance ratio. – Action 1.6: Support development that provides housing and employment opportunities to enable people to live and work within Montebello.

- City of Montebello
- The Conservation, Open Space Element (Our Natural Community) of the 2024–2040 Montebello General Plan addresses air quality for the city. In Montebello, the main contributors of air pollution are the Pomona Freeway, which runs along the northerly boundary of Montebello; the Santa Ana Freeway; the trucking companies in the southern part of Montebello; and everyday traffic on surface streets. This element provides policies and actions to help the city reduce air quality emissions within Montebello. These policies and actions are presented in Table 3.3-2 (City of Montebello 2024). – 3.3-44 | Page

City of Montebello	
City of Montebello General Plan (2024)	▪ Goal CSS-5: Minimize the exposure of residents to unhealthful noise conditions. – Policy CSS-5.1: Prioritize the reduction of traffic-related noise in residential areas and near noise-sensitive land uses. – Policy CSS-5.2: Strictly enforce violations of Chapter 9.08 of the Montebello Municipal Code related to public nuisances in the form of loud or raucous noise. – Policy CSS-5.4: Enforce the use truck routes to minimize traffic noise impacts on residential neighborhoods. – Policy CSS-5.5: Work with railroad operators to ensure that the timing, length of idleness, and number of trains through the City limits noise impacts.
Montebello Municipal Code (2024)	The noise ordinance of the City of Montebello Municipal Code is Section 17.22.110 and the vibration ordinance is Section 17.32.170.

emission standards.

City of Montebello	
Montebello Municipal Code (2024)	The Montebello Municipal Code current through Ordinance 2463, updated March 27, 2024, includes the following relevant electromagnetic policy: ▪ Section 17.32.180.B: Radio and television transmitters shall be operated at the regularly assigned wave lengths (or within the authorized tolerances therefor) as assigned thereto by the appropriate governmental agency. All electrical and electronic devices and equipment shall be suitably wired, shielded, and controlled so that in operation they shall not, beyond the lot lines, emit any electrical impulse or wave which will adversely affect the operation and control of any other electrical or electronic devices and equipment.

Policy Title	Summary
City of Montebello	
City of Montebello General Plan, Our Natural Community, Conservation and Open Space Element (2024)	The *City of Montebello General Plan* (2024) Our Natural Community chapter includes the Conservation Open Space Element, which includes the topics of air and water, greenhouse gases, open space, hillsides, watersheds, riparian areas, and plants and animals. The Rio Hondo and spreading grounds occur in Montebello. To the north of the Shared Passenger Track Alternatives on the west side of the Rio Hondo, there is a plan for enhancement of the existing Rio Hondo connector by adding Bluff Park at the end of Sycamore St at De Paul Center and bluff-top trail. This is a recreational park and will not change the quality of biological resources present.
Montebello Municipal Code 12.08.090 (2024)	The Montebello Municipal Code is current through Ordinance 2475, passed March 27, 2024. Section 12.08.090 prohibits any person from removing, trimming, pruning, or cutting any tree planted or maintained by the city. No person shall injure or destroy any tree planted or maintained by the city, by any means.

Policy Title	Summary
City of Montebello	
City of Montebello General Plan (2024)	Our Natural Community ▪ P1.1: Enhance air and water quality, increase public green space through the integration of green infrastructure. ▪ P3.7: Maintain high-quality reliable potable water and non-potable water services, diversify supply and maintain and create facilities that meet existing and future water demands including drought conditions. ▪ P3.9: Ensure that wastewater in the City of Montebello is safely and efficiently conveyed and treated under all demand scenarios, including existing and future average and peak flow sewer flow scenarios. ▪ P3.10: Utilize and maintain a robust stormwater conveyance system that protects the City from flooding impacts while seeking multi-benefit solutions including water quality. ▪ P7.3: Promote, expand, and protect a green infrastructure that links the natural habitat.
Montebello Municipal Code (2024)	The intent of Chapter 8.36: Stormwater and Urban Runoff Pollution Prevention is to enhance and protect the water quality of the receiving waters consistent with the Clean Water Act and the municipal NPDES permit. Chapter 15.48: Grading, includes provisions to safeguard health, safety, and public welfare by regulating and controlling the design, construction, quality of materials, and the location of work related to the grading and filling of land within the city.

City of Montebello	
City of Montebello General Plan, Our Safe Community (2024)	Montebello adopted the *City of Montebello General Plan* on April 10, 2024. The Our Safe Community Element includes the following policies and actions: ▪ P6.7: Identify and appraise the geologic and seismic hazards within the community. Reduce the loss of life, damage to property, and the economic and social dislocations resulting from future earthquakes. – A6.7b: Require all aspects of the earthquake, fault rupture, liquefaction, and related seismic hazard evaluation process (planning, investigation, analysis, reporting, review, construction, and operations) for new development and redevelopment to be conducted and independently reviewed by qualified professionals. – A6.7c: Require new or substantially remodeled development located within areas of liquefaction potential to be properly designed and constructed for to earthquake safety, and require all development (including City-owned facilities) to comply with established seismic safety standards.
City of Montebello Municipal Code (2024)	The City of Montebello Municipal Code is codified through Ordinance No. 2475, passed March 27, 2024. ▪ Chapter 15.04.010 California Building Code. Adopted as amended.

Policy Title	Summary
City of Montebello	
City of Montebello General Plan, Our Safe Community (2024)	On April 10, 2024, the Montebello City Council adopted a comprehensive update to the General Plan (the "2040 General Plan"). Our Safe Community was also updated in 2024 and outlines the following policies applicable to safety and security: ▪ Policy 6.1 Promote crime prevention strategies. ▪ Policy 6.3 Prevent bicycle and pedestrian accidents. ▪ Policy 6.4 Provide a high level of fire protection service in the community. ▪ Policy 6.7 Identify and appraise the geologic and seismic hazards within the community. Reduce the loss of life, damage to property, and the economic and social dislocations resulting from future earthquakes. ▪ Policy 6.8 Provide protection from wild and urban fire hazards to persons, property, and city assets. ▪ Policy 6.9 Minimize the risks from flooding and related hazards to persons, property, and city assets. ▪ Policy 6.12 Take necessary steps to establish and maintain the City's capability to respond promptly and effectively to emergencies. ▪ Policy 6.13 Plan for efficient and rapid recovery from disasters.

- Commerce Metrolink Station would be relocated on the main line at the border of Commerce and Montebello to an area northeast of the intersection of Telegraph Road and Maple Avenue, approximately 0.75 mile east of its current location. The new station location would be in both Commerce and Montebello; the platform and facilities north of the platform would be in Commerce and the station facilities south of the platform would be in Montebello. The relocated Commerce Metrolink Station would be approximately 0.4 mile farther east from the nearest fire station, 0.5 mile farther from the nearest law enforcement facilities, and approximately 1 mile farther from the nearest emergency service (hospital) facilities. No changes to existing emergency service requirements are anticipated for the relocated Buena Park or Commerce Metrolink Stations. – Page | 3.11-59
- Remaining Los Angeles County commercial and industrial displacements would occur in Montebello (2 businesses and 82 employees) – Page | 3.12-71
- Property acquisitions for the construction of the project would result in the following displacements and relocation opportunities:
    - In Montebello, there is a surplus of suitable replacement sites for the two industrial displacements.
    - The effect of displacing businesses and employees would be temporary in jurisdictions where there is a surplus of replacement sites for displaced businesses. In Commerce and Vernon, where there is currently a deficit of replacement sites, effects could be long term. However, suitable relocation sites for those businesses have been identified in surrounding cities with similar zoning and land use for commercial businesses—Montebello, Bell, Norwalk, Whittier, and Los Angeles. As presented in Table 3.12-27, there is a surplus of 23 suitable replacement sites in Montebello, 14 in Bell, 9 in Norwalk, 16 in Whittier, and 1,379 in Los Angeles. Given the nature of many businesses near the rail corridor, certain commercial or industrial businesses and employees may rely on being close to specialized customers or suppliers and may need special considerations when relocating. Ideally, replacement sites would be close enough to avoid putting an undue burden on employees who would need to travel from their homes to the new business location. – 3.12-74 | Page

Policy Title	Applicable Alternative(s) and Station Option(s)	Summary
City of Montebello		
City of Montebello General Plan, Chapter 3 Our Well Planned Community, Chapter 4 Our Accessible Community (2024)	Shared Passenger Track Alternative A, Shared Passenger Track Alternative B	The City of Montebello approved the *City of Montebello General Plan* in 2024. The general plan includes the following goals and policies to station planning, land use, and development: ▪ Policy A3.3b: Protect adjoining properties from the potential adverse impacts associated with non-residential uses on corridors adjacent to residential areas with proper mitigation measures that address scale, massing, traffic, noise, appearance, lighting, and drainage. ▪ P4.1: Support and promote walking, biking, and other nonvehicular modes as an alternative to driving within Montebello.
Montebello Municipal Code (2024)	Shared Passenger Track Alternative A, Shared Passenger Track Alternative B	Title 17 of the City of Montebello Municipal Code pertains to zoning. The purpose of the regulations contained in this title that classify, designate, regulate and restrict the use of buildings, land and structures, is to permit the most compatible use of land within the city, consistent with the needs of residential, commercial and industrial developments, and the promotion of the public health, safety, welfare and general prosperity of the city and its residents.

- City of Montebello
    - Existing land use in Montebello is depicted on Figure 3.13-A1, sheet 5, of Appendix 3.13-A. Table 3.13-B6 of Appendix 3.13-B details the total area of existing land uses within the direct RSA in Montebello. The eastern portion of the direct RSA for the proposed Commerce Metrolink Station relocation overlaps with Montebello, as depicted on Figure 3.13-A1, sheet 5, of Appendix 3.13-A. At the city's western border with Commerce, existing land uses are industrial; commercial, services, and offices; and transportation—railroad until Greenwood Avenue. From Greenwood Avenue to the Rio Hondo, the direct RSA passes through an area with single-family residential on the northern side of the LOSSAN Corridor and transportation, communications, and utilities and industrial and mixed commercial on the southern side. The Rio Hondo is characterized as an open space and recreation use. – 3.13-36 | Page
- City of Montebello
- The existing zoning for Montebello within the proposed relocated Commerce Metrolink Station indirect RSA is also depicted on Figure 3.13-A2, sheet 5, of Appendix 3.13-A. Table 3.13-C6 of Appendix 3.13-C details the total acres of existing zoning within the direct RSA in Montebello. The eastern portion of the indirect RSA for the proposed Commerce Metrolink Station relocation overlaps with

Montebello. Existing zoning is industrial on the southern side of the alignment, with a mix of industrial, single-family and multifamily residential, and commercial on the northern side of the alignment. The portion of the direct RSA bounded by Peerless Way to the west contains the other three zoning designations—single-family residential, multifamily residential, and commercial. Planned uses that could be expected would be industrial or single-family residential. Citywide street and sidewalk improvements are ongoing projects in the city. In addition, the city is working to update the City of Montebello General Plan and adopt a new Montebello Downtown Specific Plan, as well as other related actions. A service station and two restaurant pads are proposed at 7895 Telegraph Road. – 3.13-42 | Page

- In Montebello, land adjacent to construction areas is designated as transportation, communications, and utilities; open space and recreation; and industrial and mixed commercial. – 3.13-54 | Page
- In Montebello, 5.73 acres would need to be acquired and converted to transportation use. These lands are designated for industrial and mixed commercial uses and are bounded by lands with similar uses. These lands are close to the existing Commerce Metrolink Station. Because the lands to be acquired are near existing transportation uses and are bounded by lands with designated uses that have historically operated adjacent to the LOSSAN Corridor, land conversion in Montebello would not permanently alter land use patterns. – 3.13-58 | Page
- Impact LU-6: Land Use Impacts of Parking and Traffic Access Demands at Station Sites – Shared Passenger Track Alternative A
    - The Commerce Metrolink Station would be relocated to an area northeast of the intersection of Telegraph Road and Maple Avenue, which is approximately 1 mile to the east of its current location. The new station location would be in both Commerce and Montebello; the platform and facilities north of the platform would be in Commerce, and the station facilities south of the platform would be in Montebello. The platform would be accessible from the north via Sycamore Street and from the south via Maple Avenue. Improvements would be made at the intersection of Sycamore Street and Supply Avenue and the intersection of Telegraph Road and Maple Avenue to provide safe access to the new station location. Maple Avenue would connect to a variety of station facilities, such as a transit plaza for buses, bicycle parking, vehicle parking, and a pickup/drop-off area for motorists. The new station location would provide 140 parking spaces for Metrolink passengers, consistent with the number of spaces at the existing station location. Because this station would not be an HSR station and would be relocated to within 1 mile of its current location, ridership and operations are not expected to experience a substantial change. In addition, the project would provide the same number of parking spaces as the existing conditions. No substantial changes in parking and traffic access are anticipated; therefore, no changes in land use patterns at the Commerce Metrolink Station are anticipated to occur. – 3.13-62 | Page
- 5.5.2.1 Issues and Concerns

- Given the urban and dense nature of the corridor, the Authority has worked to minimize the area needed for project construction, to the extent possible, to reduce impacts on the surrounding community. As presented in Table 5-12, key issues and concerns regarding the project include:
  - Noise and vibration: Participants raised concerns about effects on sensitive receptors adjacent to the corridor during the initial scoping in 2007 and the 2020 virtual scoping meetings. Concerns included noise and vibration increases along the project alignment. Residents in Montebello specifically raised concerns about noise levels at two separate events in 2016. In addition, during the 2023 Supplemental Alternatives Analysis outreach, residents raised concerns on sensitive receptors along the unincorporated area of Whittier adjacent to the rail corridor. – 5-100 | Page

22.19 Response to Submission 013811 (Cesar Roldan, City of Montebello, Feb 2, 2026)

22.19.1 0581

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18, Standard Responses.

22.19.2 0582

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-03: Property Values, in Chapter 18.

The comment expresses several concerns regarding the proposed Commerce Metrolink Station relocation. Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) Appendix 2-C, Buena Park Metrolink Station Relocation and Commerce Metrolink Station Relocation Analysis, includes a detailed description of the California High-Speed Rail Authority's (Authority) station relocation analysis. The Authority evaluated five options for relocating the station close to the existing station. The corridor is heavily industrial in nature, with few residential parcels in close proximity. As a result, all potential options had low to modest transit-oriented development potential, as well as low scores for bicycle and pedestrian accessibility. However, the Maple Avenue site (the proposed location in the Draft EIR/EIS) would have better transit accessibility compared to the existing Metrolink station site and would also have shorter drive times for many residents in the immediate vicinity.

The commenter states that the Metrolink train would use the northern tracks within the BNSF Railway right-of-way, which is incorrect. As depicted on Figure 2-66 in the Draft EIR/EIS, passenger trains would use the two tracks on the south side of the corridor.

The commenter states that pedestrian tunnels are archaic and unsafe. Pedestrian undercrossings are commonly used at Metrolink stations; for example, there are several new undercrossings that are currently under planning and design, including at the Chatsworth, Santa Clarita, and Simi Valley Metrolink Stations.

The following responses address the specific list of concerns in the comment:

A) The commenter expresses concern over the length of the pedestrian tunnel. The pedestrian undercrossings for the project will be built with a safe and secure design. The current station concepts will be developed in more detail in later phases of design, and will be consistent with the Authority's Urban Design Guidelines (Authority 2011). Those include Crime Prevention Through Environmental Design principles, which use design and management of the physical environmental to reduce opportunities for crime and mitigate fear of crime. Security measures would be included at the station and could also be added within the tunnel itself, including measures such as cameras and gates. These measures would also be determined at a later design phase in coordination with Metrolink and the city.

B) Maintenance and security cost responsibilities at the relocated station have not yet been determined. The Authority will continue to coordinate with Metrolink and the Cities of Commerce and Montebello as the designs advance.

C) There would not be an impact related to emergency response access. Impact SS-2 of the Draft EIR/EIS was revised to clarify that the relocated Metrolink stations would not result in inadequate emergency response access; refer to Section 16.5.11, Section 3.11: Safety and Security, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS for these revisions. The relocated Commerce Metrolink Station is along Maple Avenue 500 feet off Telegraph Road, which is one of the city's major arterials. Access would be available on either side of the station platforms, from Supply Avenue in Commerce or from Maple Avenue in Montebello. The station area itself would be designed to ensure there are sufficient clearances and turning radii for emergency vehicles.

D) Maintenance and security cost responsibilities at the relocated station have not yet been determined. The Authority will continue to coordinate with Metrolink and the Cities of Commerce and Montebello as the designs advance.

E) For discussion of socioeconomic impacts, refer to Draft EIR/EIS Section 3.12, Socioeconomics and Communities. Impacts associated with business displacements, changes in property tax, and changes in city tax revenue are discussed under Impacts SO-3, SO-7, and SO-8, respectively. There would be a total of two business displacements in Montebello (which include the parcel mentioned by the commenter) that are required for the relocated Commerce Metrolink Station and a paralleling station.

F)(a) The Authority acknowledges the current zoning designation of the properties proposed to be acquired for the relocated station. These are depicted in Appendix 3.13-A, Existing Land Uses and Zoning of Project Temporary Uses and Permanent Acquisitions Figures, Figure 3.13-A1 of the Draft EIR/EIS.

F)(b) Section 3.12 of the Draft EIR/EIS acknowledges there would be an impact on long-term property and sales tax revenue in Montebello. Impact SO-7 discusses changes in property taxes, with more detail included in the *Los Angeles to Anaheim Project Section Community Impact Assessment* (available from the Authority upon request). As described in the *Los Angeles to Anaheim Project Section Community Impact Assessment*, the change in annual property tax revenue in Montebello was calculated for the one full and three partial acquisitions required in Montebello, which would be used for the relocated station. These would result in an annual loss of $49,165 in property tax, based on the assessed values of those properties in Fiscal Year 2021/2022. Impact SO-8 states the acquisition of these tax-generating properties in Montebello would result in an estimated 0.12 percent decrease ($12,105) in annual sales tax revenue in Fiscal Year 2021/2022 dollars, as presented in Table 3.12-38.

The commenter also expresses concern that the relocated Metrolink station could affect surrounding land uses. As described in Impact LU-4 in Section 3.13, Station Planning, Land Use, and Development, of the Draft EIR/EIS, conversion of the properties in Montebello from industrial to transportation use would not result in changes in land use of surrounding properties. The relocated site is surrounded by commercial and industrial land uses, similar to the conditions around the existing station. Additionally, changes in traffic patterns from the relocated site were accounted for in Section 3.2, Transportation, and no traffic delay impacts would occur in Montebello.

22.19.3 0588

Refer to the response to comment #0582 above.

Los Angeles to Anaheim - RECORD #013813 DETAIL

Status:	Unread
Record Date:	02/02/2026
Interest As:	Local Agency
Full Name:	Shahid Abbas

Stakeholder Comments/Issues:

0868

Relocating BSNF container holding area north parallel to the Washington Blvd, has significant impact on the business and economic development in the City of Commerce. It will result in closing of 115 small businesses and loss of over 1100 jobs. In addition to above it will reroute the heavy truck traffic on the City Streets especially to Washington Blvd, which is already is congested corridor. Please identify the traffic impact on the City streets and mitigation measure to operate City of commerce streets safely at an acceptable Level of Service C or better. Identify the economic impact of the relocation or closing down of businesses and loss of jobs onto the City of Commerce. BSNF container holding area must stay at its existing location and should not be relocated to the north. Shahid Abbas Director of Public Works City of Commerce 2535 Commerce Way Commerce, CA 90040 (323) 722-4805 Ext. 2839

22.20 Response to Submission 013813 (Shahid Abbas, City of Commerce, Feb 2, 2026)

22.20.1 0868

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-02: Impacts on Businesses, in Chapter 18, Standard Responses.

Section 3.12, Socioeconomics and Communities, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) includes a detailed analysis of the economic impacts from the project in Commerce. Modifications at Hobart Yard would displace an estimated 115 businesses (58 commercial and 57 industrial businesses) and 1,101 employees (Impact SO-3). As presented in Table 3.12-27 and Table 3.12-28, there would be a surplus of suitable industrial replacement sites, but only 15 available commercial sites in Commerce. For commercial businesses without a suitable replacement, alternative locations have been identified in surrounding areas. If all displaced businesses are able to relocate to available units, the deficit of 43 commercial units in Commerce would result in sales and use tax loss of 1.21 percent (Impact SO-8). If none of the displaced businesses are able to relocate in Commerce, there would be a loss in sales and use tax revenue of 2.52 percent. Any potential for revenue lost would be partially offset by increased sales tax revenue generated during construction. Overall, revenue losses would be relatively small and are not anticipated to result in the physical deterioration of government facilities.

The commenter requests more information on traffic impacts in Commerce, and that impacts be mitigated so that a minimum level of service (LOS) C is achieved. Note that under the California Environmental Quality Act, automobile delay is no longer a significant environmental impact, and direct mitigation of LOS conditions is not required. However, automobile delay remains an environmental impact under the National Environmental Policy Act (NEPA). Therefore, mitigation measures were identified to improve conditions. Impacts on roadways are included in Section 3.2, Transportation, of the Draft EIR/EIS. Section 3.2.4.4, Methods for Evaluating Impacts Under NEPA, defines the criteria the Authority uses to determine if a traffic effect would occur under NEPA. For intersections, an adverse effect would occur if the addition of the project would result in LOS E or F and an increase in the average traffic delay of 4 seconds (for signalized intersections) or 5 seconds (for unsignalized intersections) over the baseline condition. Both of these conditions need to be satisfied for an adverse effect to occur that requires consideration of mitigation. Based on these criteria, the project would result in adverse traffic effects at two intersections in Commerce: G89, Garfield Avenue/Washington Boulevard, and G210, Eastern Avenue/driveway. This is discussed in Impact TR-10 and Impact TR-11 and depicted on Figure 3.2-6 in the Draft EIR/EIS. Mitigation measures are proposed for both of these affected intersections, which include TRAN-MM#2, Restripe Intersections; TRAN-MM#4, Add Exclusive Turn Lanes to Intersections; and TRAN-MM#3, Add Signal to Intersection to Improve Level of Service/Operation; these are described in detail in Section 3.2.7, Mitigation Measures. No changes have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013821 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Jui Ing Chien

Stakeholder Comments/Issues:

Hello, Please find attached the County of Los Angeles Department of Parks and Recreation's response letter on the Draft Environmental Impact Report/Environmental Impact Statement for the California High-Speed Rail Los Angeles–Anaheim Project Section. Thank you. Jui Ing Chien Park Planner Planning and Development Agency COUNTY OF LOS ANGELES DEPARTMENT OF PARKS & RECREATION (626) 588-5317 http://parks.lacounty.gov http://rposd.lacounty.gov http://trails.lacounty.gov

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Life Better!"
Norma E. García-González, Director Alina Bokde, Chief Deputy Director

February 3, 2026

Attn: Los Angeles to Anaheim Draft EIR/EIS Comment
California High-Speed Rail Authority
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071

Dear California High-Speed Rail Authority:

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT FOR THE CALIFORNIA HIGH-SPEED RAIL LOS ANGELES TO ANAHEIM PROJECT SECTION

The County of Los Angeles Department of Parks and Recreation (LA County Parks) has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the California High-Speed Rail – Los Angeles to Anaheim Project Section, which evaluates a No Project Alternative and two build alternatives that would be implemented within the same existing rail corridor.

1127 Based on our review, LA County Parks did not identify new information in the Draft EIR/EIS that would require modification of the previous comments dated September 2, 2020, submitted during the Notice of Preparation review. As previously noted, the proposed project would intersect existing and proposed County multi-use trails, including the Los Angeles River Trail Extension, the Rio Hondo River Trail, and the San Gabriel River Trail, regardless of which Shared Passenger Track Alternative is ultimately selected.

Accordingly, LA County Parks' prior concerns regarding trail continuity, potential acquisition or temporary construction easements, construction-phase coordination, public notification, detours, and post-construction restoration remain applicable. These impacts are associated with the project's location within the rail corridor and will require coordination with LA County Parks during subsequent phases of project development, including final design and construction activities that may affect County trails.

LA County Parks reiterates that maintaining uninterrupted multi-use trail connectivity is a priority. Any work affecting County trails will require coordination with LA County Parks and compliance with applicable County standards and requirements, including

1127 restoration consistent with County trail guidelines. A copy of LA County Parks' previous comments is included for reference.

For further details regarding County multi-use trail requirements, please contact Robert Ettleman at (626) 588-5323 or rettleman@parks.lacounty.gov. Please note that any work affecting existing County multi-use trails may require a right-of-entry permit from LA County Parks. Requests regarding right-of-entry permits should be directed to Permit-License-Agreement@parks.lacounty.gov.

Thank you for the opportunity to review and comment on the Draft EIR/EIS. LA County Parks looks forward to continued coordination with the California High-Speed Rail Authority as the project advances.

Sincerely,

Chien, Jui Ing

Jui Ing Chien
Park Planner

Attachment

c: Parks and Recreation (L. Hikichi, R. Ettleman)

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Liife Better!"

Norma E. Garcia-Gonzàlez, Director

September 2, 2020

Attn: Los Angeles to Anaheim Section
Mr. Mark McLoughlin
Director of Environmental Services
California High-Speed Rail Authority
770 L Sheet, Suite 620, MS-2
Sacramento, CA 95814

Dear Mr. McLoughlin:

REVISED NOTICE OF PREPARATION OF A PROJECT LEVEL ENVIRONMENTAL IMPACT REPORT / ENVIRONMENTAL IMPACT STATEMENT (EIR/EIS) FOR THE LOS ANGELES TO ANAHEIM PROJECT SECTION OF THE CALIFORNIA HIGH-SPEED RAIL SYSTEM

1128 The Revised Notice of Preparation (NOP) of an EIR/EIS for the Los Angeles to Anaheim section of the California High-Speed Rail (HSR) System has been reviewed for potential impacts on the facilities of the Los Angeles County Department of Parks and Recreation (DPR). The Los Angeles to Anaheim Section EIR/EIS will consider a No Project Alternaitve and a HSR Project Alternative. The HSR Project Alternative may impact the following existing or proposed trails:

- Los Angeles River Trail Extension (Proposed)
- Rio Hondo River Trail (Existing)
- San Gabriel River Trail (Existing)

1129 These multi-use trail (equestrian, hiking and mountain bicycling) alignments either bisect or run parallel to the HSR Project Alternative. Please evaluate the trails and indicate whether the HSR Project Alternative would require acquisition or temporary construction easements. With respect to trails, DPR's primary goal is to ensure and maintain continued multi-use trail connectivity. Solutions to possible conflicts between the final alignment of the HSR Project Alternative and County trails include: trail under-crossings and re-routing. DPR will require recordation of trail easements and construction of trails in specific areas where the final alignment of the HSR intersects existing or proposed County trails adopted by the Los Angeles County Board of Supervisors.

If temporary trail closures are required during construction, the project proponent must coordinate with DPR to identify multi-use trail detours if possible. In consultation with DPR, the project proponent will need to provide advance public notification and temporary trail signage for any multi-use trail closures or detours. At the conclusion of construction, County multi-use trails shall

1129 be restored to conditions consistent with County of Los Angeles Trails Manual, including provisions for any existing amenities such as fencing or signage. For further details regarding County multi-use trail requirements, please contact Robert Ettleman at (626) 588-5323 or rettleman@parks.lacounty.gov. Any work affecting existing County multi-use trails may require a right-of-entry permit from DPR. For inquiries on the right-of-entry permit, please contact Diane Thorne at (626) 588-5324 or dthorne@parks.lacounty.gov.

1130 Please note that DPR facilities are protected under the California Public Park Preservation Act of 1971, which ensures no net loss of public parkland and facilities. The Act requires the County to either receive payment and/or replacement property whenever park land is acquired by another public entity for non-park purposes. In the event that any DPR park land and facilities are acquired, DPR shall acquire substitute park land and facilities. If, however, less than 10 percent of the park land, but not more than one acre, is acquired, DPR may, instead of acquiring substitute park land and facilities, improve the unacquired portion of the park land and facilities, using the funds received for this purpose, after holding a public hearing on the matter and upon a majority vote of the Board of Supervisors. In the event that the County acquires or develops the above-mentioned proposed Los Angeles River Trail Extension, such land shall be subject to the Public Park Preservation Act.

Thank you for including this Department in the review of this notice. We look forward to continued coordination and collaboration with the California High-Speed Rail Authority throughout the project planning process. Should you have any questions, please contact Ms. Jui Ing Chien, Park Planner, at (626) 588-5317 or jchien@parks.lacounty.gov.

Sincerely,

Sean Woods
Chief of Planning

SW:CL:JIC:ev

Attachment

c: Parks and Recreation (A. Bokde, C. Lau, M. O'Connor, L. Barocas, J. Chien, R. Ettleman, D. Thorne)

22.21 Response to Submission 013821 (Jui Ing Chien, Los Angeles County Department of Parks and Recreation, Feb 3, 2026)

22.21.1 1127

Section 3.15, Parks, Recreation, and Open Space, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) includes a detailed analysis of impacts on parks and recreational resources within the project footprint, including the Los Angeles River Trail Extension (Planned), the Rio Hondo River Trail, and the San Gabriel River Trail, which are facilities managed by the Los Angeles County Department of Parks and Recreation.

As discussed in Section 3.15.6.3, Project Impacts, construction of the project would not diminish access to or use of the Los Angeles River Trail Extension (Planned). The planned trail would run along the eastern side of the river, parallel to the Los Angeles to Anaheim Project Section (project section). An additional segment of the trail would run along the southern side of the 26th Street light maintenance facility for approximately 0.5 mile. The closest portion of the trail would be 100 feet from construction activities. Although the trail and its users may be subject to short-term nuisance impacts if the trail is built prior to the project section (e.g., fugitive dust, noise and vibration, visual change), access to the trail would be maintained during project construction activities and permanent access to the trail would not be affected once the project section is operational.

Construction of the project would temporarily diminish access to or use of the Rio Hondo River Trail and the San Gabriel River Trail. However, impacts would be reduced through mitigation. Construction of the project section would occur directly adjacent to and within the boundaries of the Rio Hondo River Trail. The trail would pass directly beneath the proposed alignment and a temporary construction staging area would be located on the trail, which could result in short-term closures of the resource. The San Gabriel River Trail would pass directly beneath the proposed alignment for approximately 100 feet. Because of the proximity of water crossing work, construction activities would temporarily diminish access to the resource. However, the trail would be protected with scaffolding and would remain operational during construction, with the exception of intermittent closures. The California High-Speed Rail Authority (Authority) would implement PR-MM#1 (Temporary Restricted Access to Park Facilities During Construction), which would reduce effects on the Rio Hondo River Trail and the San Gabriel River Trail by ensuring that affected portions of the trails would remain accessible during construction and alternative access would be provided through temporary detours. Implementation of PR-MM#2 (Providing Park Access) would ensure that connections to unaffected portions of the trails and nearby roadways are maintained during construction. The contractor will provide short-term and permanent multimodal access using existing roadways or other public right-of-way, as needed.

The Authority will coordinate in advance with the Los Angeles County Department of Parks and Recreation regarding any temporary or permanent impacts on county facilities associated with the Preferred Alternative. Minor revisions have been made to Section 3.15.6.3 of the Draft EIR/EIS in response to this comment. Revisions include edits to the Impact PR-4 discussion regarding access impacts on resources resulting from construction activities. Please refer to Section 16.5.15, Section 3.15: Parks, Recreation, and Open Space, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS for these revisions.

22.21.2 1128

The commenter states that the Los Angeles County Department of Parks and Recreation reviewed the project Notice of Preparation and noted that implementation of the project section may affect the Los Angeles River Trail Extension (Planned), the Rio Hondo River Trail, and the San Gabriel River Trail. As discussed in Section 8.4, Preferred Alternative, of the Draft EIR/EIS, the Authority identified Shared Passenger Track Alternative A as the Preferred Alternative for the project section because it best meets the project's purpose and need by serving the most potential passengers in the most cost-effective manner while also reducing impacts on the environment, existing rail operations, and communities. The Draft EIR/EIS also analyzed impacts related to Shared Passenger Track Alternative B. Section 3.15 of the Draft EIR/EIS includes a detailed analysis of impacts on parks and recreational resources by alternative. Refer to response to comment #1127 above for additional

details. This comment does not address the sufficiency of the Draft EIR/EIS, nor does it suggest edits to the document; accordingly, no change has been made to the document in response to this comment.

22.21.3 1129

As discussed in Section 3.15.6.3 of the Draft EIR/EIS, implementation of the project section would not require permanent acquisition or temporary construction easements of the Los Angeles River Trail Extension (Planned) or the San Gabriel River Trail. As noted in response to comment #1127 above, a construction staging area would be located within the Rio Hondo River Trail, requiring a temporary construction easement that may temporarily affect access to portions of the trail. The Authority would implement PR-MM#1 and PR-MM#2 to reduce these effects, which require the contractor to document how connections to the unaffected trail portions and nearby roadways are maintained during and after construction and require short-term and permanent detours or multimodal access, thereby minimizing temporary impacts and maintaining access during construction. Provisions of PR-MM#1 require that the contractor provide detour signage and lighting to ensure alternative routes meet public safety requirements.

The Authority will coordinate in advance with the Los Angeles County Department of Parks and Recreation regarding any temporary or permanent impacts on county facilities associated with the Preferred Alternative. Refer to response to comment #1127 above. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.21.4 1130

Los Angeles County Department of Parks and Recreation facilities in the project vicinity include the Los Angeles River Trail Extension (Planned), the Rio Hondo River Trail, and the San Gabriel River Trail. Impacts on these resources are discussed in the response to comment #1127 above.

Section 3.15.6.3 of the Draft EIR/EIS, and specifically Impact PR-5, describes that no permanent acquisitions of Los Angeles County recreation facilities are anticipated.

The Authority will coordinate in advance with the Los Angeles County Department of Parks and Recreation regarding any temporary or permanent impacts on Los Angeles County facilities associated with the Preferred Alternative. No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013822 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Jay Fuhrman

Stakeholder Comments/Issues:

Thank you for the opportunity to provide public comment on the Los Angeles to Anaheim Draft EIR Document. Please see the attached comments from LA Metro. Thank you. Jay Fuhrman LA Metro Senior Manager, Passenger Rail Planning Countywide Planning 310-993-7338 metro.net | facebook.com/losangelesmetro | @metrolosangeles Metro's mission is to provide world-class transportation for all. CONFIDENTIALITY NOTICE: This email message (including any attachments) from the Los Angeles County Metropolitan Transportation Authority is for official use by its intended recipients only. It contains information that may be confidential, privileged, attorney work product, or otherwise exempt from disclosure under applicable law. If you have received this email in error, be advised that any review, reproduction, distribution, or other use is strictly prohibited. Please notify the sender immediately by replying to the email if you have received this message in error and delete this message and any attachments.

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

February 2, 2026

LaDonna DiCamillo
California High Speed Rail Authority
Attn: Los Angeles to Anaheim Draft EIR/EIS Comment
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071

Re: Comments on the Los Angeles to Anaheim Project Section Draft EIR/EIS

Dear Ms. DiCamillo:

The Los Angeles County Metropolitan Transportation Authority (LA Metro) appreciates the opportunity to review and provide comments regarding the Los Angeles to Anaheim Project Section Draft EIR/EIS, which was released for public review on December 5, 2025. LA Metro's Passenger Rail Planning team (within the Office of Countywide Planning and Development) works closely with California High Speed Rail Authority (CHSRA), Southern California Regional Rail Authority (Metrolink), the Federal Railroad Administration, LOSSAN, Amtrak, and other key partners to develop and advance a fully integrated regional passenger rail system across Los Angeles County and Southern California, including the Los Angeles to Anaheim corridor.

LA Metro offers the following comments:

Intermediate Station at Norwalk / Santa Fe Springs

0851 Per CHSRA's EIR/EIS, the intermediate station options at Norwalk/Santa Fe Springs and Fullerton were considered but not included in the Preferred Alternative. The City of Santa Fe Springs and the City of Commerce both endorsed the "HSR Station Option: Norwalk/Santa Fe Springs" due to its lower environmental impact. In addition, the voter approved Measure M identifies funds that would construct the C Line extension to Norwalk with a completion timeline between 2052 and 2054.

LA Metro recommends advancing an intermediate station in Norwalk/Santa Fe Springs station in the Preferred Alternative to facilitate a direct future connection between three rail services – Metro C Line, CA High Speed Rail, and Metrolink – and access to Los Angeles International Airport (LAX) via transfer.

Commerce Station Relocation

0852 It should be noted that the Cities of Pico Rivera, Commerce, and Montebello have indicated their preference (See Attachment 1) for relocating the current Commerce station to a location within the City of Pico Rivera. The recommended location in the attached letter of support offers the greatest regional benefit and helps achieve goals related to economic vitality and multimodal connectivity.

LA Metro is committed to working with local jurisdictions, railroad partners, and CHSRA to advance high-quality passenger rail service along the LA to Anaheim corridor as resources become available.

LINK US Project

0853 Metro supports transportation improvements within the City of Vernon and encourages the California High-Speed Rail Authority team to continue close coordination with the LINK US Project team to identify and advance feasible solutions that enhance project outcomes and community benefits.

LA River Path Bike Project

0854 The LA River Bike Path project, for which a Draft EIR has been released for public review in December 2025, overlaps with the CHSRA project from LA Union Station to Redondo Junction. Although the LA River Path is mostly in the river channel, CHSRA's need to acquire property and easements may conflict with LA River Path design, should the project receive approvals and obtain full funding.

LA Metro requests continued coordination with CHSRA regarding the LA River Path Project.

Three Grade Separations in Los Angeles County

0855 Grade separation projects are fundamental to the safe, reliable operation of passenger and freight rail service while also yielding significant pedestrian and vehicle safety benefits.

LA Metro supports the grade separation projects at Pioneer Boulevard, Norwalk/Los Nietos, and Lakeland Road and encourages CHSRA to pursue grade separation opportunities throughout LA County wherever practicable, especially as early-action investment opportunities to deliver safety benefits ahead of revenue operation.

Conclusion

0856 Thank you for the opportunity to provide comments regarding the Los Angeles to Anaheim Draft EIR/EIS. We look forward to continued collaboration and close partnership with the California High Speed Rail Authority to advance this critically important transportation project which will provide significant mobility benefits and options to residents of the greater Los Angeles region.

Should you have any questions, please feel free to reach out to Michael Cano, Executive Officer at canom@metro.net.

Sincerely,

Ray Sosa

Ray Sosa
Chief Planning Officer

Attachment 1: Letter from the Cities of Pico Rivera, Commerce and Montebello

cc: Michael Cano, Executive Officer
Carlos Montez, Deputy Executive Officer
Jay Fuhrman, Senior Manager

Docusign Envelope ID: 07F04197-A82A-4F5D-997F-DB4745878910

ATTACHMENT 1

City of Commerce
2535 Commerce Way,
Commerce, CA 90040

City of Montebello
1600 W. Beverly Blvd.
Montbello, CA 90640

City of Pico Rivera
6615 Passons Blvd.
Pico Rivera, CA 90660

May 31, 2025

The Honorable Janice Hahn
Chair, Board of Directors
Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza
Los Angeles, CA 90012

Mr. Tom Richards
Chair, Board of Directors
California High Speed Rail Authority (CAHSR)
770 L Street, Suite 620
Sacramento, CA 95814

Subject: Joint Support for Rail Optimization and the Metro Station Relocation Alternative along the LA-to-Anaheim Railroad Corridor

Dear Chair Hahn and Chair Richards:

0857 As vested stakeholders within the Los Angeles-to-Anaheim railroad corridor, the Cities of Commerce, Montebello, and Pico Rivera (Cities) commend the leadership and commitment of each respective agency and transportation authority working to optimize freight and passenger rail service in this vital corridor. With key mainline connections to the national rail network and major intermodal yards in the Gateway sub-region, the Cities recognize the corridor's critical role in both the local and national economy. The corridor is also well served by Metrolink and Amtrak, providing vital transit alternatives across Southern California. Our cities understand that this corridor is in dire need of significant improvements to relieve rail congestion, streamline operational efficiencies, and build ridership demand.

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0858 This joint letter expresses general support for proposed capital investments insofar that they also align with local priorities. For example, the Cities agree that the Commerce Flyover Project should be prioritized to deliver rail efficiencies and regional goods movements benefits, despite requiring relocation of the existing Commerce Station. However, the proposed relocation site conflicts with local General Plans, misaligns with regional transportation policy, and undermines State-level community and economic development goals. The Cities and the surrounding sub-region would be better served by relocating the station to a planned transit-oriented community where maximum ridership growth is also a strategic and deliberate outcome. Therefore, the cities strongly urge LA Metro and California High Speed Rail Authority (CAHSR) to prioritize relocation of the Commerce Station to the City of Pico Rivera.

Commerce Flyover & Station Relocation

Each city has reviewed and provided comments for the Preliminary Engineering for Project Definition Report (PEPD) prepared by CAHSR as part of the CEQA and NEPA environmental clearances. The PEPD Preferred Alternative proposes a new flyover viaduct in the City of Commerce to address a significant bottleneck in the Southern California railroad network while building capacity for high-speed passenger rail service in the future. In furtherance of the State Rail Plan, the California State Transportation Agency's (CalSTA) identified the Commerce Flyover Project as a high-priority, high-value project and made preliminary investments through the Port and Freight Infrastructure Program (PFIP). While the Commerce Flyover Project improves operational flexibility, it also necessitates demolishing and relocating the existing Commerce passenger rail station.

As a mitigation, CAHSR proposes to relocate the station approximately 0.85 miles east to a new site within the City of Montebello (1550 S Maple Ave, Montebello, CA 90640). Surrounded by heavy industrial land uses, the new station site conflicts with local, regional, and State-level goals and policies related to transit-oriented community development.

City of Montebello – Local Plans & Goals

0859 On April 10, 2024, the City of Montebello adopted a Downtown Specific Plan, a Bicycle Master Plan, and the 2040 General Plan update. Due to inadequate outreach by CAHSR, these comprehensive, multi-year, community-oriented plans do not reference or account for the proposed new station. As a result, the proposed station site is entirely inconsistent and misaligned with the city's newly adopted Land Use, Mobility/Circulation, and Housing Elements.

The identified area is designated for heavy industrial uses, is located near an existing brownfield site, lacks basic multimodal infrastructure, and is not well suited for a mixed-use, transit-oriented community. Furthermore, Montebello's Capital Infrastructure Program does not consider perpetual maintenance and operational costs tied to the proposed station. The City of Montebello is also not

Docusign Envelope ID: 07F04197-A82A-4F5D-997F-DB4745878910

0859 in concurrence with the proposed impact on local businesses and the surrounding industrial area associated with the proposed station site.

The City of Montebello strongly urges CAHSR and Metro to re-evaluate the station relocation mitigation plans and identify an alternative location that better aligns with local, regional, and State-level goals.

City of Commerce – Local Plans & Goals

0860 The City of Commerce understands the overall significance of the Commerce Flyover Project and acknowledges that the existing Commerce passenger station creates operational conflicts and hinders both freight and passenger rail services from reaching its fullest potential in the corridor. Although the proposed new station site is technically within the jurisdictional boundaries of the City of Montebello, it is located immediately adjacent to the Commerce city limits. According to the Zoning Map in the Commerce 2020 General Plan, the area surrounding the proposed site is zoned M2 – Heavy Industrial and far removed from current or proposed residential and commercial land uses. The City of Commerce does not intend to accommodate residential, mixed-use, or transit-oriented development in the proposed station area and maintains an interest in preserving its land use priorities.

The City is aware that due to incompatible surrounding land uses, limited transit service, lack of active transportation amenities, and complicated train operations in this segment of railroad, boardings and ridership demand at the existing Commerce station is relatively low, especially when compared to other stations along Amtrak's Pacific Surfliner route, which is often touted as the 2nd busiest commuter rail corridor in the nation. To maximize ridership potential, CAHSR and LA Metro should prioritize a station site that can be fully integrated with housing and mixed-use development in accordance with urban planning best practices and modern transit-oriented community development.

Furthermore, as the owner and operator of the existing Commerce station, the City of Commerce seeks to ensure that it is equitably considered throughout the planning and decision-making process of the Flyover Project. The City of Commerce also seeks to recoup previous capital investments and maintenance expenditures related to the existing station.

City of Pico Rivera – Local Plans & Goals

0861 The City of Pico Rivera is implementing the PR 2035: Community Revitalization Program to proactively leverage major transportation investments that are converging in the city's central core. LA Metro's Eastside light rail line (E-Line) along with CAHSR's LA-to-Anaheim PEPD and the Rosemead/Lakewood Boulevard BRT Corridor (RoseWood BRT) has prompted the city to master

Docusign Envelope ID: 07F04197-A82A-4F5D-997F-DB4745878910

0861 plan a holistic, multimodal, mixed-use urban downtown; a vibrant uptown; and dynamic riverfronts in Pico Rivera.

Embracing this next stage in the city's evolution, Pico Rivera is embarking on a comprehensive General Plan update that will support the strategic implementation of higher density housing, multiple mass transit lines, first/last mile connections, an active transportation network, climate adaptation initiatives, new energy efficient neighborhoods, a sports and entertainment district, a micro-EV manufacturing zone and innovation business cluster, a 570-acre passive park on the Rio Hondo, and significant capacity enhancements to critical utilities. Equally important, the city is currently studying and striving to enact a wide range of revenue generating alternatives including special assessment districts and value capture mechanisms to help finance future infrastructure needs and sustain long-term growth. A regional rail station in downtown Pico Rivera would significantly support local and regional efforts to foster a more urban, multimodal live-work-play environment that is economically viable and climate resilient.

Metro Feasibility Study – Pico Rivera Regional Rail Station

0862 In 2024, LA Metro initiated the Pico Rivera Regional Rail Station Feasibility Study to explore and identify a viable station relocation alternative that not only optimizes rail operations but also enables dense transit-oriented development. After conducting technical analysis, capturing community input, coordination with rail operators (e.g. LOSSAN Agency, Metrolink, and CAHSR), and consultation with city officials and staff, Metro identified a suitable location for a regional rail station in the City of Pico Rivera.

The preferred location is adjacent to the Rio Hondo, facilitating access to the Class-I bikeway system and promoting regional active and multimodal transportation. The station location is also in proximity (approximately 1-mile) of two Metro light rail stations along the 9-mile Eastside (E-Line) Extension and the Rosemead/Lakewood Boulevard (RoseWood) BRT corridor. Recognizing that Pico Rivera is transitioning to a multimodal future, the city is fully embracing transit-oriented community development. As such, the preferred station location is well aligned with the City of Pico Rivera's plans to develop a vibrant and bustling transit-oriented downtown community that encompasses a sports and entertainment district, a Micro EV Tech Hub and Innovation District, riverfront parks and trails systems, and people-oriented cultural placemaking. A regional rail station is a critical element to accommodate higher volumes of dense, urban-style housing and mixed-use developments – objectives that cannot be realized at the site proposed by CAHSR.

Conclusion

0863 In reviewing the proposed rail improvements outlined in CAHSR's PEPD Report, the Cities of Commerce, Montebello, and Pico Rivera have identified significant misalignments between the proposed Montebello station relocation site and local General Plans, regional transportation

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0863

priorities, and community development objectives. More broadly, the site proposed by CAHSR contradicts key state policies, including the California Transportation Plan 2050, the Climate Action Plan for Transportation Infrastructure, and the State Rail Plan. These inconsistencies raise serious concerns about the suitability and strategic soundness of the proposed Montebello station relocation.

Based on local consensus, technical evaluations, regional collaboration, and community input, the Pico Rivera station site identified in Metro's Feasibility Study offers the greatest regional benefit and helps achieve goals related to economic vitality, climate resilience, housing development, and multimodal connectivity. The cities urge CAHSR and LA Metro to prioritize and advance the Pico Rivera station location into implementation. The Cities also recognize the importance of the Commerce Flyover Project and stand ready to support its successful implementation.

The Cities of Commerce, Montebello, and Pico Rivera reaffirm their commitment to working in partnership with CAHSR, Metro, and other regional partners to plan and design, environmentally clear, secure necessary funding, and ultimately construct these priority railroad projects in the LA-to-Anaheim rail corridor.

Thank you for your leadership and dedication to advancing a more efficient, integrated, and sustainable transportation network for Southern California.

Sincerely,

x_____

Ernie Hernandez
City Manager
City of Commerce
ehernandez@ci.commerce.ca.us

x_____

Raul Alvarez
City Manager
City of Montebello
ralvarez@montebelloca.gov

x Signed by: Steve Carmona 649C4BA8C5B144A...

Steve Carmona
City Manager
City of Pico Rivera
Scarmona@pico-rivera.org

Cc:

Bob Archuleta, California Senator, District 30

Lisa Calderon, California Assemblymember, District 56

Toks Omishakin, Secretary of Transportation, California State Transportation Agency

Ian Choudri, CEO, California High-Speed Rail Authority

Stephanie Wiggins, Los Angeles Metro

22.22 Response to Submission 013822 (Jay Fuhrman, Los Angeles County Metropolitan Transportation Authority, Feb 3, 2026)

22.22.1 0851

Refer to Standard Response LAA-Response-Chapter 2 Alt-03: HSR Station Options, in Chapter 18, Standard Responses.

The Authority acknowledges Los Angeles County Metropolitan Transportation Authority's (Metro) support for the Norwalk/Santa Fe Springs High-Speed Rail (HSR) Station Option. However, Los Angeles Union Station (LAUS) and Anaheim Regional Transportation Intermodal Center (ARTIC) are only 30 miles apart and existing Amtrak and Metrolink passenger rail service already provides connections among ARTIC, Fullerton, Norwalk/Santa Fe Springs, and LAUS. Although an HSR station in Norwalk/Santa Fe Springs would potentially allow for a direct connection to a future Metro C Line extension, it would still present duplicative passenger rail service, increased impacts, and increased project costs, as described in Chapter 8, Preferred Alternative, of the Draft EIR/EIS.

22.22.2 0852

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

22.22.3 0853

Refer to Standard Response LAA-Response-GENERAL-04: General Opinions, Opposition, or Support, in Chapter 18.

The Authority appreciates Metro's collaboration on the project and will continue to work with Metro and the Link Union Station project team as the Los Angeles to Anaheim Project Section HSR designs advance.

22.22.4 0854

The HSR alignment is not anticipated to conflict with the LA River Path alignments; however, there are overlaps between the two project footprints involving temporary construction areas for the HSR project. As a proposed recreational resource, the LA River Path Project is discussed in Section 3.15, Parks, Recreation, and Open Space, of the Draft EIR/EIS. As discussed in Section 3.15.6.3, Project Impacts, construction and implementation of the Los Angeles to Anaheim Project Section would not preclude the LA River Path Project, and project impacts would be temporary. The LA River Path is also included in the cumulative project list presented in Section 3.19, Cumulative Impacts. The Authority will coordinate in advance with Metro regarding any impacts on agency facilities associated with the Preferred Alternative.

22.22.5 0855

Refer to Standard Response LAA-Response-Chapter 2 Alt-05: Grade Separations, in Chapter 18.

The Authority appreciates Metro's collaboration on the project. The Authority will continue to work with local jurisdictions to support implementation of the grade separations as early action projects.

22.22.6 0856

The Authority appreciates Metro's collaboration on the project, and will continue to work with Metro as the designs advance.

22.22.7 0857

The Authority appreciates the collaboration with the Cities of Commerce, Montebello, and Pico Rivera, and looks forward to future coordination efforts as the project continues to develop.

22.22.8 0858

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Concerning state-level goals and policies around transit-oriented development, Section 1.1.3.3, The California State Rail Plan, explains that the California State Rail Plan states that the project is a foundational component of the statewide, integrated rail transportation network, which promotes economic development, enhances environmental sustainability, and advances equity by offering seamless mobility options for Californians.

With regard to local and regional plans and policies, the Authority is a state agency and is therefore not required to comply with local land use and zoning regulations. However, it has endeavored to design and build the HSR project so that it is compatible with land use and zoning regulations. Section 3.13.3, Consistency with Plans and Laws, describes the project's inconsistencies relevant to land use and station planning. No inconsistences were identified related to transit-oriented development. Further details on project consistency with regional and local plans and policies is addressed in Appendix 3.1-A, Regional and Local Policy Inventory and Consistency Analysis.

22.22.9 0859

Refer to Standard Response LAA-Response-Chapter 2 Alt-02: Changes to Passenger Rail Station Facilities, in Chapter 18.

The comment expresses several concerns with the proposed relocation of the Commerce Metrolink Station to a site primarily in Montebello. Refer to Draft EIR/EIS Section 2.6.3.5, Freight or Passenger Railroad Modifications, for a description; Figure 2-66 depicts the proposed relocation site. The comment asserts that the Authority's outreach to the City of Montebello was inadequate and that the proposed passenger rail use is inconsistent with locally adopted plans, and disagrees with the Authority's conclusions about the impacts of the station relocation on local businesses.

Regarding the Authority's outreach to the City of Montebello, refer to Draft EIR/EIS Appendix 9-A, Comprehensive List of Public and Agency Meetings. In this appendix, Table 9-A1 lists 16 meetings the Authority conducted with Montebello staff and elected officials between March 2008 and December 2024. This table also notes the Authority conducted open house meetings Montebello in 2010 and 2018. These are in addition to numerous general open houses and other regional events convened by the Authority. The Authority therefore respectfully disagrees with the assertion of inadequate outreach to the City of Montebello.

Regarding the compatibility of the proposed relocated station with locally adopted land use and zoning regulations, the Authority has endeavored to build the HSR project to be as compatible as possible with such regulations, even though, as a state agency, the Authority's compliance with local regulations is not required. Notwithstanding, as documented in Draft EIR/EIS Appendix 3.1-A, the Authority evaluated the consistency of the proposed HSR project with the Montebello Bicycle Master Plan (April 2024) and Montebello 2024–2040 General Plan (April 2024). As presented in the appendix, the proposed project would be consistent with goals of both plans. Montebello's Downtown Specific Plan focuses on the Whittier Boulevard corridor and immediate surroundings, approximately 2 miles north of the proposed relocation site and HSR corridor. Given that the Downtown Specific Plan does not cover the geographic area within which the HSR corridor or the proposed relocation site are located, Appendix 3.1-A did not evaluate it for consistency.

Montebello's 2024–2040 General Plan designates the proposed station relocation site for industrial development. The existing Commerce Metrolink Station is in an industrial area. No mixed used or transit-oriented development is proposed for the relocation site, so neither mixed-use nor transit-oriented zoning is necessary. The Authority would be responsible for conducting regular maintenance along the track and railroad right-of-way, as well as other vital systems required for the safe operation of the HSR system. Additional specifics on the maintenance activities anticipated for stations are provided in Draft EIR/EIS Section 2.8.3, Maintenance Activities. The Authority will coordinate with the City of Montebello as the project design advances as part of defining long-term maintenance roles and responsibilities.

Regarding impacts on local businesses, refer to Draft EIR/EIS Section 3.12, Socioeconomics and Communities. Impacts associated with business displacements, changes in property tax, and changes in city tax revenue are discussed in Impacts SO-3, SO-7, and SO-8, respectively. There would be a total of two business displacements in Montebello, which are required for the relocated

Commerce Metrolink Station and a paralleling station. The Draft EIR/EIS discloses that acquisition of these tax-generating properties would result in an estimated 0.12 percent decrease in annual sales tax revenue, as presented in Table 3.12-38.

22.22.10 0860

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

The comment expresses concern that the proposed relocation of the Commerce Metrolink Station could indirectly lead to conflicts with planned land uses in Commerce.

The existing Commerce Metrolink Station is along the railroad at E 26th Street. This station is across the railroad from the southeastern edge of the BNSF Railway Hobart Yard. Surrounding land uses are entirely industrial. Rail facilities consist of a boarding platform and off-street parking for 140 cars.

Draft EIR/EIS Figure 2-33 depicts the proposed relocation site, which includes some elements in Montebello. Plans also call for a pedestrian tunnel to Sycamore Street in Commerce.

Although the Authority is not required to comply with local land use and zoning regulations, it has endeavored to design and build the HSR project so that it is compatible with land use and zoning regulations. Existing land uses in and near the proposed relocation site are industrial, similar to existing uses surrounding the station's current site. Moreover, both cities have zoned the area around the proposed relocation site for heavy industrial/heavy manufacturing uses. Montebello has zoned the proposed relocation sites as M-2 Heavy Manufacturing. According to the Montebello Municipal Code, terminal and station uses are conditionally allowed in the M-2 zone (i.e., require a conditional use permit).

The City of Commerce has zoned the lands along Sycamore Street near the proposed tunnel to the relocation site as M-2 Heavy Manufacturing. According to Commerce's Municipal Code, transportation-related uses are conditionally permitted in this zone.

With incorporation of LU-IAMF#1, Passenger Rail Station Area Development: General Principles and Guidelines, the Authority will apply practices and guidance regarding improving connectivity to the station planning for the proposed relocated Commerce Metrolink Station. The land use and zoning at the current and proposed locations are similar. Accordingly, the proposed relocation would not be inconsistent with existing or planned land uses in either Commerce or Montebello.

The Authority will continue to engage with the City of Commerce (as well as other jurisdictions) through future phases of design and construction. As documented in Draft EIR/EIS Appendix 9-A, the Authority held more than 25 meetings with City of Commerce staff, elected officials, and trade organizations between 2007 and 2019. The Authority also acknowledges the request to recoup previous city expenditures on the existing station.

Refer also to the response to comment #0859 above.

22.22.11 0861

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Thank you for the information about these two planning efforts: the Pico Rivera 2035: Community Revitalization Program (adopted in 2020) as well as the forthcoming comprehensive general plan updates. The Pico Rivera 2035: Community Revitalization Program is considered as part of the projects listed in Appendix 3.19-A, Cumulative Plans and Nontransportation Projects List, in the Draft EIR/EIS. Because the forthcoming comprehensive general plan update is not finalized, it is not considered in the Draft EIR/EIS.

22.22.12 0862

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Refer to response to comment #0852 above.

22.22.13 0863

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Refer to the responses to comments #0858, #0859, and #0860 above regarding purported inconsistencies of the proposed relocated Commerce Metrolink Station with locally adopted land use plans. Although the Authority is not required to comply with local land use and zoning regulations, it has endeavored to design and build the HSR project so that it is compatible with land use and zoning regulations. The responses to comments #0859 and #0860 indicate the proposed relocation is consistent with local zoning for the proposed relocation site.

Finally, the Authority recognizes and appreciates the coordination between the cities. Although respectfully disagreeing with assertions in this comment, the Authority looks forward to working with the cities and Metro as project design advances.

Los Angeles to Anaheim - RECORD #013827 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Alexis Murillo Felix

Stakeholder Comments/Issues:

Good morning, Attached please find the Southern California Association of Governments (SCAG) comment letter on the California High-Speed Rail Authority's Los Angeles to Anaheim Project Section Draft EIR/EIS. SCAG appreciates the opportunity to provide input and looks forward to continued coordination as the project advances. Thank you, Alexis Murillo-Felix Senior Regional Planner Mobility Planning & Goods Movement | Multimodal Integration Tel: (213) 630-1461 felix@scag.ca.gov SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS 900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017

SCAG
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Rick Denison, Yucca Valley

Transportation
Mike T. Judge, Ventura County Transportation Commission

1131

1132

February 3, 2026

Mr. Ian Choudri
Chief Executive Officer
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

RE: SCAG Comment Letter on CHSRA's Los Angeles to Anaheim Project Section Draft Environmental Impact Report/Environmental Impact Statement

Dear Mr. Choudri:

The Southern California Association of Governments (SCAG) appreciates the opportunity to provide comments on the California High-Speed Rail Authority's (CHSRA) Los Angeles to Anaheim Project Section Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS).

SCAG has maintained a strong and collaborative partnership with CHSRA, working closely to advance a cohesive statewide and regional rail network. SCAG recognizes the significance of the Los Angeles to Anaheim Project Section as a critical link in California's future high-speed rail system and as an essential investment in Southern California's multimodal transportation network.

SCAG views the Draft EIR/EIS as laying a strong foundation for implementation of high-speed rail service in Southern California. The document demonstrates meaningful progress toward delivering true high-speed rail while also supporting capital improvements to the regional passenger rail system along the Los Angeles–San Diego–San Luis Obispo (LOSSAN) Corridor. The integration of high-speed rail with existing commuter and intercity rail services is vital to maximizing system performance, regional mobility, and long-term ridership growth.

The following comments are provided to support interagency coordination and collaboration. SCAG offers the following comments for CHSRA's consideration:

Station Reconfiguration and Relocation

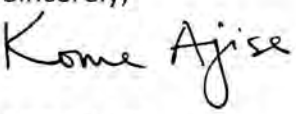
1132 SCAG understands that implementation of the proposed alternative will require reconfiguration and, in some cases, relocation of stations along the LOSSAN Corridor. SCAG requests that CHSRA continue to work closely with station owners, local jurisdictions, and affected operators to mitigate potential impacts associated with station redesigns or relocations. It is critical that these changes further enhance passenger access, connectivity, service reliability, or the overall rider experience.

1133 **Shared-Use Operations and Agreements**

SCAG also requests that CHSRA coordinate closely with track owners, freight railroads, and passenger rail operators along the Los Angeles Union Station (LAUS) to Anaheim Regional Transportation Intermodal Center (ARTIC) segment to ensure that shared-use agreements are established in a timely manner. Clear and enforceable shared-use frameworks are essential to supporting safe and efficient interoperation among all users and to ensuring that high-speed rail service can be successfully integrated with existing and planned rail operations.

SCAG appreciates the Authority's continued coordination with regional partners and looks forward to ongoing collaboration as the project advances into subsequent phases of environmental review and implementation. Please do not hesitate to contact SCAG staff should there be a need for additional coordination or discussion. If you have any questions, please contact Courtney Aguirre, Manager of Mobility Planning and Goods Movement, at (213) 236-1990 or aguirre@scag.ca.gov.

Sincerely,



Kome Ajise
SCAG

22.23 Response to Submission 013827 (Alexis Murillo Felix, Southern California Association of Governments, Feb 3, 2026)

22.23.1 1131

Refer to Standard Response LAA-Response-GENERAL-04: General Opinions, Opposition, or Support, in Chapter 18, Standard Responses.

The California High-Speed Rail Authority (Authority) appreciates the Southern California Association of Governments' partnership and looks forward to future coordination efforts as the project continues to develop.

22.23.2 1132

The Authority is committed to ongoing coordination with agencies and stakeholders in the development of station plans to enhance the passenger experience and minimize potential impacts.

22.23.3 1133

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Los Angeles to Anaheim - RECORD #013832 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Shirley Gooding

Stakeholder Comments/Issues:

The attached letter is sent to you on behalf of Aaron Hake, Executive Director, RCTC. Thank you. Shirley Gooding Senior Administrative Assistant Riverside County Transportation Commission 951.787.7964 4080 Lemon St. 3rd Fl.| P.O. Box 12008 Riverside, CA 92502 rctc.org

RIVERSIDE COUNTY TRANSPORTATION COMMISSION

4080 Lemon St. 3rd Fl. Riverside, CA 92501
Mailing Address: P.O. Box 12008 Riverside, CA 92502-2208
951.787.7141 • rctc.org

February 2, 2026

LaDonna DiCamillo, Director
California High-Speed Rail Authority
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071
VIA EMAIL: Los.Angeles_Anaheim@hsr.ca.gov

Re: RCTC's Comments on the Draft Environmental Impact Report / Environmental Impact Statement for the California High-Speed Rail – Los Angeles to Anaheim Project Section (SCH # 2007031067)

Dear Director DiCamillo:

1584 The Riverside County Transportation Commission (RCTC) appreciates the opportunity to provide comments on the Draft EIR/EIS (SCH #2007031067) for the Los Angeles–Anaheim section of the California High-Speed Rail Project (Project). RCTC submits these comments to reiterate and expand upon concerns raised in prior correspondence and to emphasize the need for these issues to be fully and timely addressed in the Project's Draft EIR/EIS.

1585 RCTC is a responsible agency for the Project under the California Environmental Quality Act (CEQA) because it is a signatory to the San Bernardino Subdivision Shared Use Agreement (SUA) with BNSF Railway Company and the Orange County Transportation Authority (OCTA), which governs the San Bernardino Subdivision rail corridor. Under the SUA, RCTC and OCTA hold the exclusive passenger rail rights for all non-Amtrak passenger rail services along the corridor from Los Angeles to San Bernardino. BNSF did not retain authority to independently grant third-party passenger rail access along this corridor. Accordingly, any proposed use of the corridor by the California High-Speed Rail Authority requires RCTC's approval for segments east of Fullerton and joint approval by RCTC and OCTA for segments between Redondo Junction and Fullerton.

As currently described, the Project would directly interfere with these exclusive passenger rail rights. Despite this, the Project's Draft EIR/EIS continues to defer analysis and resolution of this fundamental legal and operational issue. Continued deferral is not appropriate. The Draft EIR/EIS must clearly acknowledge RCTC's rights and authority under the SUA and must fully analyze how the Project would affect RCTC's existing and planned passenger rail services before the Project advances to the next phase of design, construction, or any side agreements with BNSF that could purport to dismiss or impair RCTC's legal rights.

1586 RCTC is particularly concerned that the Project, as proposed or as incrementally refined, could constrain or preclude future passenger rail services that are central to regional mobility goals. The Draft EIR/EIS must demonstrate that the Project will not adversely affect current and planned Metrolink operations or RCTC's future Coachella Valley Rail service, including access to tracks, operational flexibility, layover and storage facilities, and long-term capacity within the shared corridor. All Project alternatives must preserve the ability for Metrolink and Coachella Valley Rail to operate throughout the corridor without degradation of service, reliability, or expansion potential.

1587 In addition to these operational and legal concerns, the Draft EIR/EIS must fully evaluate and disclose the Project's environmental impacts on Riverside County and the broader Inland Empire, even where physical Project elements are located outside county boundaries. Prior Project revisions have contemplated changes to freight and passenger operations that would shift impacts eastward, including increased rail and truck activity associated with reconfigured corridor operations and related freight facilities. These impacts are not speculative and must be addressed directly in the environmental analysis. This should include a review and analysis of the implications to Metrolink and Amtrak service as well as the long-term impact of capacity and potential for future improvements related to RCTC track agreements. In addition, the operating elements of train performance, coordinated dispatching, and on-time performance requirements need to be taken into consideration. This expansion involves expanded capacity for freight service that should be evaluated relative to the corridor impacts in the communities across the region.

1588 The Draft EIR/EIS must also clearly identify RCTC as an agency responsible for coordination of track operations and right- of-way ownership throughout the San Bernardino Subdivision and must ensure that all future passenger rail services, including Coachella Valley Rail, are consistently reflected in Project descriptions, figures, legends, and operational assumptions.

1589 RCTC expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearing and proceeding related to this Project. (Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.*

1590 RCTC strongly supports expanded passenger rail service throughout Southern California. However, that expansion must occur in a manner that respects existing legal agreements, preserves future regional rail investments, and fully discloses and mitigates environmental impacts as required by CEQA and NEPA. RCTC looks forward to continued coordination with CHSRA and requests focused engagement to resolve these issues prior to advancement of the Project.

Thank you for your consideration of these comments.

Sincerely,

Aaron Hake
Executive Director

22.24 Response to Submission 013832 (Shirley Gooding, Riverside County Transportation Commission, Feb 3, 2026)

22.24.1 1584

The commenter introduces concerns on the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) that are raised in the subsequent comments. Refer to responses to comments #1585 to #1590 below.

22.24.2 1585

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18, Standard Responses.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

The California High-Speed Rail Authority (Authority) acknowledges the Riverside County Transportation Commission's (RCTC) passenger rail rights along the San Bernardino Subdivision. The Draft EIR/EIS acknowledges that the Authority will be required to coordinate with RCTC in Table 2-24 of Chapter 2, Alternatives, of the Draft EIR/EIS, Section 2.11, Permits and Approvals. Table 2-24 presents the major environmental reviews, permits, and approvals required for the project (as of November 2024), as well as the regional agencies with which the Authority would need to coordinate. As detailed therein, RCTC is identified as a California Environmental Quality Act (CEQA) responsible agency and the Authority will require approval for construction and use in coordination with RCTC's passenger operations in the project corridor.

Table 2-24, Anticipated Environmental Reviews, Permits/Approvals, and Coordination by Agency, has been revised to clarify that formal approvals by local/regional agencies will be determined at a later stage of project design, through agency coordination and agreements, and that this list is to highlight the CEQA responsible agencies with which the Authority intends to coordinate during final design. Refer to Section 16.4, Chapter 2: Alternatives, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS for this revision.

22.24.3 1586

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

The Draft EIR/EIS acknowledges RCTC's proposed Coachella Valley – San Gorgonio Pass Rail Corridor Service in Chapter 2 of the Draft EIR/EIS, Section 2.6.1.4, Planned Local and Regional Fixed Guideway Transit Rail and Bus Improvements. As detailed therein, RCTC is considering multiple alignments for the Coachella Valley – San Gorgonio Pass Rail Corridor Service, including segments where service would operate in the Los Angeles – San Diego – San Luis Obispo Rail Corridor between Los Angeles Union Station and Fullerton. This project's final Tier 1 document was certified in June 2022, and RCTC is actively seeking funding to proceed with preparing future Tier 2 National Environmental Policy Act/CEQA documents to advance the project.

22.24.4 1587

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

The Draft EIR/EIS acknowledges RCTC's proposed Coachella Valley – San Gorgonio Pass Rail Corridor Service in Chapter 2 of the Draft EIR/EIS, Section 2.6.1.4. Refer to response to comment #1586 above.

With respect to previous consideration of components that could have shifted project impacts eastward, Section 2.5.2, Range of Potential Alternatives Considered and Findings, of the Draft EIR/EIS documents the reasons why the Authority eliminated the BNSF Railway Lenwood and Colton Components from the Los Angeles to Anaheim Project Section. After scoping the 2018 High-Speed Rail Project Alternative, the Authority received substantial opposition to and concern about the BNSF Railway components and, therefore, decided to consider additional alternatives that could eliminate the need to redirect trains and trucks to a new intermodal facility in San Bernardino County. The Authority's 2023 Supplemental Alternatives Analysis includes more detail on the evaluation and justification for selecting the Shared Passenger Track Alternative.

22.24.5 1588

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to responses to comments #1585 and #1586 above for how RCTC is characterized in the Draft EIR/EIS.

22.24.6 1589

This comment is acknowledged. This comment does not address the sufficiency of the Draft EIR/EIS, nor does it suggest edits to the document; accordingly, no change has been made to the document in response to this comment.

22.24.7 1590

The Draft EIR/EIS fully discloses the environmental impacts of the Los Angeles to Anaheim Project Section and sets forth mitigation measures to minimize the identified impacts. Specific concerns raised by RCTC in this comment letter are addressed in the preceding responses. The Authority will continue to coordinate with RCTC as project design advances.

Los Angeles to Anaheim - RECORD #013836 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Nicholas Ghirelli

Stakeholder Comments/Issues:

To Whom It May Concern: Attached are the City of Vernon's comments on the Los Angeles to Anaheim Draft EIR/EIS. Please confirm receipt. Thank you, Nick Nicholas R. Ghirelli Shareholder RICHARDS WATSON GERSHON 1 Civic Center Circle P.O. Box 1059 Brea, CA 92822-1059 T: 714.990.0901 D: E: nghirelli@rwglaw.com W: rwglaw.com

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1 Civic Center Circle, PO Box 1059
Brea, California 92822-1059
rwglaw.com

February 3, 2026

VIA ELECTRONIC MAIL

California High-Speed Rail Authority
Board of Directors
770 L Street, Suite 620
Sacramento, CA 95814
Los.Angeles_Anaheim@hsr.ca.gov

Re: City of Vernon's Comments on Los Angeles to Anaheim Project Section's Environmental Impact Statement/Environmental Impact Report

Dear Chair Richards and Members of the Board of Directors:

This firm has been retained by the City of Vernon ("City") to provide comments on the California High-Speed Rail Authority's ("CHSRA") Los Angeles to Anaheim Project Section ("LAA Project") and Draft Environmental Impact Statement / Environmental Impact Report ("Draft EIR").

0804

As a preliminary matter, the City does not object to the expansion of high-speed passenger rail service and the larger LAA Project. But high-speed rail should not come at the expense of local communities, such as Vernon, that will experience real and legitimate harm if the Project is not properly designed, studied, and operated. In its current form, the LAA Project would cause significant impacts on businesses, emergency access, traffic, and other environmental issues arising from the proposed construction of the 26th Street Light Maintenance Facility ("LMF") and related improvements in and around BNSF's Hobart Yard within the City (collectively, "Hobart Expansion"). Many of the Draft EIR's deficiencies relate to traffic impacts caused by the rerouting and termination of portions of 26th Street. The City has serious concerns about the impact that the rerouting and closure of 26th Street at Ayers Road would have on its already congested traffic system and the surrounding community.

0805

As a result, the City respectfully requests that CHSRA locate the LMF at 15th Street in Los Angeles and avoid further burdening the City with impacts caused by even more heavy rail operations. Should the CHSRA nevertheless select 26th Street in Vernon as the LMF location, then the City requests that CHSRA alter the Hobart Expansion, and identify alternative designs that would minimize impacts along 26th Street. Specifically, the City requests that **CHSRA extend 26th Street from Ayers Road to and through the Pennington Way overpass to Bandini Road. As**

0805 **explained below, the 26th Street overpass and Bandini Road connection is critical for traffic and goods movement within the City. If the CHSRA provides this connection, then the City would likewise commit to working in good faith with CHSRA to address other outstanding issues identified in this letter.** This would avoid unnecessary traffic impacts and still allow for the LAA Project to proceed.

0806 In addition, the City remains strongly opposed to the proposed expansion of BNSF's Malabar Yard as part of the LA County Metropolitan Transportation Authority's ("Metro") LINK Union Station ("LINK US") Project. As noted in the Draft EIR, the LAA Project "is closely interrelated" with the LINK US Project's platforms, tracks, and the viaduct that crosses over U.S. Highway 101. (Draft EIR, p 1-9). The City does not necessarily oppose the passenger rail aspects of the LINK US Project, and therefore does not intend to reiterate its comments on the LINK US Project's SEIR/EIS that have previously been provided to the CHSRA. However, the City reserves its rights to challenge the CHSRA's approval of the LINK US Project's EIS, as it has done with Metro's certification of the SEIR, or any attempt to incorporate the Malabar Yard expansion into the LAA Project.

For the foregoing reasons, the Draft EIR's analysis of the LAA Project must be improved, and appropriate minimum corrective action is to alter the proposed Hobart Expansion in order to maintain the existing length of 26th Street through Pennington Way. The City's comments below reflect both CEQA and NEPA compliance.

0807 ## I. Inadequacies in the Draft EIR Analysis

CEQA requires that an EIR identify the significant environmental effects of a project across a range of impact areas. (See, State CEQA Guidelines 15126.) For the reasons discussed below, the Draft EIR as currently presented fails to properly analyze potential impacts in a number of key areas, including transportation, air quality, noise/vibration, public safety, and hazards/hazardous materials.

In addition, NEPA requires public agencies to "take a 'hard look' at environmental consequences" to implement the broad public purposes of NEPA and "guarantee[] broad public dissemination of relevant information." (*Robertson v. Methow Valley Citizens Council*, 490 U.S. 332 (1989).) As discussed in detail below, the Draft EIR fails to take a hard look at the Hobart Yard Expansion and does not include enough relevant information to inform the public about the project. It is therefore also inadequate under NEPA.

0808 ### A. Transportation

The Transportation analysis for the Hobart Expansion is technically deficient and does not properly account for impacts on traffic patterns in the vicinity of the Hobart Yard. The City engaged traffic and transportation experts at Urban Crossroads to closely review the Draft EIR's transportation analysis. (*See*, Urban Crossroads, Los Angeles to Anaheim Rail Traffic Study Peer

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Review ("Traffic Peer Review"), dated January 27, 2026, attached hereto as Exhibit "A".) The Traffic Peer Review highlighted a number of deficiencies in the Draft EIR's traffic analysis that must be addressed, in addition to the following defects in the Draft EIR's methodology and findings:

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1. Outdated baseline traffic data

Even though the Draft EIR was released in December 2025, the Draft EIR still uses the year 2015 as the baseline for its impact analysis, with updated counts for the area around the Hobart Yard from 2021. The analysis does not account for changes in traffic despite changes in trucking volume and travel patterns in the intervening period, especially after the end of quarantine restrictions and supply chain shocks related to the COVID-19 pandemic. The data is clearly stale, especially in a city, like Vernon, that experiences heavy logistics truck traffic. As such, it is unclear whether the baseline figures used in the Draft EIR are still accurate. To provide an accurate analysis of project impacts, the baseline numbers must be updated to reflect the actual existing traffic in and around the Hobart Yard. Any discrepancies between the 2015, 2021 and current numbers must be incorporated into an updated impact analysis.

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2. Failure to study intersection at Ayers Avenue/Bandini Boulevard

In connection with the Hobart Expansion, CHSRA proposes the termination of 26th Street at Ayers Avenue, which would result in the closure of the I-710 underpass and Atlantic Boulevard overpass, and sever the connector to Bandini Boulevard via Pennington Way. (*See*, Appendix 3.1-B: Los Angeles to Anaheim: Footprint Mapbook, p. 8.)

When evaluating the potential traffic impacts of the proposed road closure, the Draft EIR should consider why the overpass and underpass were initially constructed along this critical segment of 26th Street, particularly in light of their role in facilitating traffic flow. In 2001, the City entered into a Letter of Agreement (the "LOA") with the Los Angeles County Metropolitan Transportation Authority ("Metro") to fund a series of improvements near the intersections of Bandini Boulevard and the I-710 and Atlantic Avenue. (Letter of Agreement for Project Planned through the State Transportation Improvement Program, attached hereto as Exhibit B.) Among other things, the LOA provided for the construction of an arterial bypass at a cost of $15.153 million, which consisted of the extension of 26th Street to Bandini Boulevard, and a bridge over Atlantic Boulevard. (LOA, p. 10.) The stated goal of the project was as follows:

> "Due to its mounting traffic congestion at the I-710/Atlantic/Bandini Intersection and Interchange, improvements to this Intersection and Interchange will: (1) reduce congestion and queueing on the I-710; (2) significantly improve conditions for trucks traveling in and out of the BNSF and UP Rail Yards; (3) assist Port-generated truck movements which exit the I-710 at Atlantic Ave./Bandini Blvd. to reach the BNSF and UP Rail Yards; and (4) help preserve a critical manufacturing

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center in the Los Angeles region by facilitating the transportation of raw materials/supplies and finished goods in and out of the area." (LOA, p. 10.)

The need for an arterial bypass to alleviate congestion around the I-710 ramps has not changed. Removing this critical connector would risk a return to the traffic congestion and business interruptions that Metro and the City worked collaboratively to address 25 years ago. Ironically, this would impact BNSF's own operations as the overpass is used by trucks carrying freight from the port to the Hobart Yard. Further, the Hobart Expansion calls for the addition of a new traffic signal at the intersection of Bandini Boulevard and Ayers Avenue – in very close proximity to the I-710 South off-ramp – which would exacerbate traffic slowdowns and gridlock in an already congested corridor. For this reason, the impacts of the termination of 26th Street at Ayers Avenue are unacceptable.

The Draft EIR does not adequately study the consequences of this proposed street closure. Section 3.2 analyzed Level of Service and Volume-to-Capacity ratios at various intersections within the relevant Resource Study Areas. (Draft EIR, pp. 3.2-59 0 3.2-63.) The Draft EIR studied traffic along Bandini Boulevard between Atlantic Boulevard and Eastern Avenue, and at intersections along Bandini Boulevard at the Atlantic Boulevard/I-710 Northbound ramp (but not Southbound) and the I-5 South Bound. Critically, however, the Draft EIR did not study traffic conditions at the intersection of Ayers Avenue and Bandini Boulevard. For the reasons stated above, it is essential that the Draft EIR evaluate baseline traffic conditions at that intersection to understand how the project might impact traffic in and around that location. This is especially important given that TRAN-MM#3 requires construction of a new two-phase traffic signal at that intersection. Interestingly, the Draft EIR lists "Horizon Year 2040" impacts with and without the LAA Project, but it is unclear how those numbers were derived without a base-year study. (Draft EIR, Section 3.2, p. 3.2-106.)

The City requests that the Draft EIR include an alternative that maintains the current 26th Street overpass and a careful study of the impacts that the termination of 26th Street at Ayers Avenue would have on traffic patterns throughout the area, including along Bandini Boulevard and at the I-710 ramps, both northbound and southbound.

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3. Failure to study geometric design hazards

CEQA requires that an EIR measure transportation impacts that "[s]ubstantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)." (*See*, CEQA Handbook, Appendix G.) Section 3.2.4.5 of the Draft EIR notes that "[i]mpacts related to increases in hazards because of geometric design features or incompatible uses and impacts resulting in inadequate emergency access are evaluated in Section 3.11 of this Draft EIR/EIS." However, Section 3.11 does not specifically address this CEQA requirement. A study of potential geometric hazards is critical for the Hobart Expansion, given that the closure of 26th Street will result in an abrupt dead end requiring a 90-degree turn onto

0811 Ayers Avenue, and necessitate the installation of a traffic signal to control access from the relatively narrow Ayers Avenue onto the much larger Bandini Boulevard. The Hobart Expansion should avoid these hidden traffic dangers by maintaining the current flow of traffic on 26th Street, and the Draft EIR must be updated and recirculated with a careful study of potential traffic and safety impacts related to the proposed changes.

0812 **B. Public Safety**

1. Inadequate analysis of emergency response impacts

When analyzing potential impacts on response times for fire, rescue and emergency services, Section 3.11 of the Draft EIR states: "Some roads near Hobart Yard and a portion of a roadway near Commerce Yard would be permanently closed, because of the modifications to the yards. These affected roads are minor streets that currently provide access to the BNSF yards and adjacent businesses, but, after construction, these roads and parcels would become part of the modified yard areas; therefore, emergency response times would not be affected by these closures." (Draft EIR, Section 3.11, p. 3.11-85.) Characterizing the affected roadways as "minor streets" inaccurately minimizes the Hobart Expansion's potential traffic and safety impacts. In particular, there may be major traffic impacts related to the rerouting of 26th Street and elimination of the I-710 underpass and Atlantic Avenue overpass.

As discussed above, rerouting 26th Street would likely have major traffic impacts since it would remove a critical bypass route for Bandini Boulevard, and install a new traffic signal along a busy thoroughfare in close proximity to the I-710 Southbound ramp. Notably, according to Vernon Police Chief Robert Sousa, the Vernon Police Department currently uses the 26th Street bypass when responding to incidents during the morning and afternoon rush hour periods, when traffic gridlock occurs around the I-710 ramps. Given the high potential for worsened traffic congestion in the area, it is critical that the Safety and Security Section carefully study the impact that traffic slowdowns along Bandini Boulevard might have on emergency response times within the City of Vernon and eastward into the City of Commerce.

0813 **2. Transportation Management Plans Do Not Provide Sufficient Mitigation**

To "avoid or reduce temporary impacts on emergency response during construction," the Draft EIR will require CHSRA to develop a Construction Safety Transportation Management Plan ("CSTMP") as an impact avoidance and minimization feature (SS-IAMF#1). (Draft EIR, Section 3.11, p. 3.11-76.) Reliance on the CSTMP and similar plans are not adequate mitigation under CEQA. Instead, they amount to impermissible deferred mitigation. Rather than committing to specific, enforceable performance standards or physical improvements that will ensure emergency response times are maintained during construction, CHSRA relies on the future preparation of plans and discretionary coordination efforts to be developed after project approval. CEQA requires that mitigation measures be fully formulated and enforceable at the

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time of approval, or at minimum include clear, objective standards demonstrating that impacts will be reduced to less-than-significant levels. Here, the IAMFs merely describe general topics to be addressed — such as detours, scheduling, and coordination — without establishing quantifiable response-time thresholds, identifying guaranteed access routes, specifying allowable roadway capacity reductions, or demonstrating how emergency services will function under worst-case construction scenarios. In addition, monthly reporting and compliance monitoring do not cure this defect, as they track adherence to plans whose effectiveness has not been evaluated or disclosed.

In effect, the Authority defers both the formulation and the efficacy determination of mitigation to a later date, depriving decision-makers and the public of meaningful information about whether emergency access impacts can in fact be avoided or substantially reduced during construction. This violates CEQA's prohibition on deferred mitigation, and its requirement for enforceable, outcome-based mitigation measures.

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3. Hazards / Hazardous Material Impacts

CHSRA proposes the construction of the 26th Street LMF over a portion of the former Exide Facility, which is a recognized Superfund Site. (Draft EIR, Section 3.10, p. 3.10-26.) While the Draft EIR describes the extensive history of the site and the ongoing remedial work, the Draft EIR also notes that "[b]ecause of the extensive nature of potential impacts associated with the Exide site and because groundwater monitoring and site characterization activities are ongoing, a timeline for completion of remediation activities associated with CERCLA and the Hazardous Substance Control Law compliance is currently unknown." (Id.) Given that contaminated soils and groundwater may still exist on the site, CHSRA must clearly analyze and explain its intended work in the area and how it might exacerbate existing hazardous conditions. The Supplement to Hazardous Materials and Wastes Technical Report briefly describes the intended work near the Project site (at page 3-1), but does not clearly describe of the extent of any ground disturbance or permanent structures to be built in that area. To understand the nature of the impact, the Draft EIR must include a thorough analysis of the proposed work at the Exide site.

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C. <u>Air Quality</u>

As detailed below, the Air Quality analysis for the Hobart Expansion is technically deficient and does not properly account for impacts on sensitive receptors in the vicinity of the Hobart Yard, including residences. The Draft EIR's methodology and findings fail to meet CEQA and NEPA standards in the following ways:

1. Failure to evaluate localized emissions

Section 3.3 evaluates impacts related to air quality and global climate change. In its analysis of criteria air pollutants, Section 3.3 compares the projected construction emissions from the

0815 Hobart Yard against federally set General Conformance *De Minimis* thresholds, rather than regional thresholds established by the South Coast Air Quality Management District (SCAQMD). (*See*, Draft EIR, Section 3.3, Table 3.3-15, pp. 3.3-101 - 102.) Curiously, however, the Draft EIR concludes that, "During project construction, emissions of ROG, CO, PM10, PM2.5, and SO2 would remain below the SCAQMD daily regional significance thresholds." (*See*, Draft EIR, Section 3.3, pp. 3.3-101 - 102.)

Generally speaking, CEQA mandates that EIRs measure air quality impacts against regional or local air quality standards, such as those set by SCAQMD. (*See*, CEQA Handbook, Appendix G.) Indeed, Mitigation Measure AQ-MM#1 requires the purchase of emissions offsets in order for the project to compensate for exceeding SCAQMD thresholds, though Table 3.3-15 does not actually appear to compare potential emissions against those SCAQMD standards. (Draft EIR, Section 3.3, p.3.3-176.) Without measuring project impacts against regional air quality standards, the Draft EIR fails to properly quantify significant impacts and identify potential mitigation measures to reduce those impacts. Therefore, the Draft EIR must be updated and recirculated to incorporate an analysis of air quality impacts against SCAQMD standards.

0816 Pursuant to NEPA, an EIS must include a "hot-spot analysis" when a proposed project, like the LAA Project, may contribute to localized violations of air quality standards, even where total emissions are below *de minimis* thresholds. (*See*, *Nat. Res. Def. Council, Inc. v. U.S. Dep't of Transp.*, 770 F.3d 1260, 1264 (9th Cir. 2014) ("Project sponsors must carry out this hotspot analysis to ensure that the project does not cause or contribute to any new localized ... $PM_{2.5}$ violations, increase the frequency or severity" of such violations, or "delay timely attainment" of air quality goals.'")) Here, the Draft EIR only compares projected construction and operations emissions for the Hobart Yard Expansion against region-wide *de minimis* standards, and does not study localized impacts despite the acknowledged existence of sensitive receptors within the vicinity of the Hobart Yard. Without measuring localized project impacts, the Draft EIR fails to properly take a "hard look" at potential adverse effects. The Draft EIR must be updated and recirculated to incorporate an analysis of localized air quality impacts, as required by NEPA.

0817 **2. Failure to identify and evaluate impacts on nearby sensitive receptors**

As the Draft EIR itself notes, all EIRs must study a project's potential to expose sensitive receptors to substantial pollutant concentrations. (Draft EIR, Section 3.3, p. 3.3-85; *see*, CEQA Handbook, Appendix G.) The Draft EIR notes that there are a number residential and worker receptors within the vicinity of the Hobart Yard. (Draft EIR, Section 3.3, p. 3.3-85.) However, the Draft EIR's analysis of potential air quality impacts on those sensitive receptors is inadequate for the following reasons.

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i. Distance threshold is arbitrary and does not comport with SCAQMD guidance

The Draft EIR improperly applies a 1,000 foot screening radius "based on CARB modeling guidance and project-specific factors of the Shared Passenger Track Alternatives." (Draft EIR, Section 3.3, p. 3.3-47.) Notably, however, SCAQMD does not impose such a strict screening radius when analyzing impacts on sensitive receptors. In its prior guidance, SCAQMD "recommended that the AQMD be consulted to obtain facility-specific emissions information and accepted assessment methods for determining relative exposure and health risk for proposed projects." (*See*, SCAQMD, "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning", May 6, 2005, p. 2-4. https://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=9e021c61_4.)

The Draft EIR must explain why the 1,000-foot screening radius was selected. Given the increase in train and automotive traffic and idling in the area, air quality impacts may very well extend beyond the threshold applied in the Draft EIR analysis.

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ii. Lack of reliable data on increased freight activity

The Draft EIR notes that approximately 101,094 feet of support and storage tracks would be constructed adjacent to the southern portion of the Hobart Yard, which would increase freight activity in the area. (Draft EIR, Section 3.3, p. 3.3-66.) However, the Draft EIR only studied air quality impacts based on 2017 data and under a "no project" scenario. (*Id.*) CHSRA did not receive any input from BNSF about planned increases in activity at the Hobart Yard, which would likely be substantial given the large expansion of freight track. (*Id.*) While the Draft EIR performs a "qualitative assessment" of potential increases in BNSF activity at Hobart Yard, it cannot do a proper quantitative analysis without reliable data from BNSF. The installation of approximately 101,094 linear feet of additional track at the Hobart Yard constitutes a substantial project component, and must be analyzed based on accurate data — not mere speculation or extrapolation — to determine the need for mitigation.

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iii. Other sensitive receptor sites have not been properly considered

The Draft EIR also omits key sensitive receptor sites that would be impacted by increased activity at the Hobart Yard. Notably, there are a number of factories and worksites in close proximity to the Hobart Yard where factory workers would be exposed to heightened air pollutants during their 8-hour shifts. In order to properly study the air quality impacts of the Hobart Expansion, the Draft EIR must be updated and recirculated to address impacts on these additional sensitive receptor sites.

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3. Failure to identify and evaluate impacts on nearby EJ Community

The EIS must study the Project's potential to cause "disproportionate and adverse human health and environmental effects on communities with environmental justice concerns." (40 CFR 1502.16.) The EIS notes that "[c]onstruction-related air quality, noise, and traffic impacts could occur on substantial minority populations based on census block data." (Draft EIR, Section 3.3, p. 3.3-66.) However, the Draft EIR does not specifically discuss on of the particular impacts on this potential environmental justice community ("EJ Community"). Due to the existence of residences within vicinity of the Hobart Yard, the Draft EIR cannot summarily ignore localized air quality impacts that will inevitably be borne by the EJ Community.

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D. Noise / Vibration

The City engaged noise/vibration experts at Urban Crossroads to closely review the Draft EIR's noise and vibration analysis. (*See*, Urban Crossroads, "California High-Speed Rail, Los Angeles to Anaheim Project Section EIR/EIS - Noise Section 3rd Party Review" ("Noise Peer Review"), dated January 27, 2026, attached hereto as Exhibit "C".) This analysis identifies a significant flaw in the Draft EIR, as explained in detail in the report. In particular, the Noise Peer Review notes that the Draft EIR does not properly analyze whether the businesses in close proximity to the Hobart Yard would be considered "Type I" land uses for which vibration levels would interfere with onsite operations.

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In addition, the Noise/Vibration analysis for the Hobart Expansion is technically deficient and does not properly account for effects on sensitive receptors in the vicinity of the Hobart Yard, including residences within 1,000 feet of the area. Section 3.4 of the Draft EIR notes, with respect to permanent operational noise at the Hobart Yard, that "changes in noise from project-related relocation of freight tracks within the right-of-way were evaluated based on the changes in distance between the freight tracks and nearby sensitive receptors using FRA methodology." (Draft EIR, Section 3.3, p. 3.4-53.) As the Draft EIR states, "Noise levels from project operation would depend on the number of trains per day, speed of the trains, track configuration, and distance of receivers to the tracks." (*Id.*) However, the noise calculations do not appear to accurately account for the large increase in train volume at the Hobart Yard that will result from installation of approximately 101,094 additional fee of track. As discussed with respect to Air Quality impacts above, CHSRA did not receive any input from BNSF about planned increases in activity at the Hobart Yard. (Draft EIR, Section 3.3, p. 3.3-66.) The Draft EIR must use accurate data about the planned train traffic and idling times at the Hobart Yard in order to correctly study potential noise and vibrational impacts in the area. The Draft EIR must be updated and recirculated to accurately address such impacts.

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II. Lack of Adequate Project Description

An accurate, stable and finite project description is the *sine qua non* of a legally sufficient Draft EIR. (*Cnty. of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 193 (Ct. App. 1977).) However, where an EIR fluctuates between multiple distinct project alternatives, the environmental analysis becomes a moving target, and can render the proposed mitigation measures, impact conclusions, and alternatives analysis unreliable. For example, in *Washoe Meadows Community v. Department of Parks & Recreation*, 17 Cal. App. 5th 277 (2017), the court held that a project description that included multiple options gave conflicting signals about the proposed project, and thus violates the CEQA requirement that a project description must be "stable and finite." In that case, the lead agency studied five potential alternatives in detail and indicated that one of the alternatives would eventually be selected as the project. (*Id.* at p. 288.) The court stated that "inconsistencies in a project's description, or . . . the failure to identify or select any project at all, impairs the public's right and ability to participate in the environmental review process." (*Id.*)

Here, as in *Washoe Meadows*, the Draft EIR fails to present an accurate, stable and finite project description, as required by CEQA. Instead of a single, clearly defined project, the Draft EIR evaluates two materially different build alternatives—Shared Passenger Track Alternative A and Alternative B—as if they are interchangeable versions of the proposed project. However, Alternatives A and B differ in critical respects, including track configuration, construction footprint, duration and intensity of construction activities, use of interim and permanent rail facilities, and the nature and severity of impacts to adjacent communities, emergency access, traffic operations, and rail service. Yet the Draft EIR repeatedly analyzes impacts in the aggregate or defers choosing between Alternatives A and B until a later date. This leaves the City in the untenable position of "hoping" that CHSRA chooses Alternative B and the placement of the LMF in Los Angeles.

Because the Draft EIR fails to present a single, stable project description and instead relies on an unresolved comparison between Alternatives A and B, the Draft EIR must be recirculated with a clear and consistent project description that identifies the specific LMF location proposed for approval.

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III. Need for Additional Study of Alternatives

Under CEQA, an EIR must describe a range of reasonable alternatives to a project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. (Cal. Code Regs. tit. 14, § 15126.6.) As discussed above, the Draft EIR presents two so-called "Alternatives" as part of its project description. Aside from the mandatory No Project Alternative, however, the Draft EIR does not analyze any other alternatives beyond Alternative A and Alternative B, which it treats as interchangeable versions of the proposed project. As a matter of law and policy, the Draft EIR must include other feasible

0824 alternatives to provide decision makers with the necessary range of options when reviewing the Project.

0825 **IV. Conclusion**

Given the LAA Project's significance, the City respectfully requests that the points raised in this letter be carefully considered and, where necessary, that additional analysis be incorporated into the Draft EIR and recirculated for review. Further, in light of the acute problems that will arise from the planned termination of 26th Street at Ayers Road, the City proposes that CHSRA select Alternative B's placement of the LMB in the City of Los Angeles or, at a minimum, the Hobart Expansion be redesigned to retain the 26th Street Overpass and connection to Bandindi Road. The City remains willing to cooperate with CHSRA and BNSF to find feasible alternative routes that would minimize impacts on the neighboring commercial and residential communities.

Should CHSRA fail to revise the Draft EIR as requested, the Draft EIR will remain inadequate under CEQA. The City therefore objects to certification of the Draft EIR in its current form, and to any further action on the Project until the necessary and proper environmental review has been completed, and all potential impacts have been analyzed, disclosed, and properly mitigated. If the Draft EIR is certified without addressing the many issues raised in this letter, the City will have no choice but to explore potential legal options to protect its community from the Project's significant environmental impacts.

The City reserves its right to submit additional comments as deemed appropriate. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

Nicholas R. Ghirelli

cc: Honorable Mayor and City Council
Brian Saeki, City Administrator
Zaynah Moussa, City Attorney
Dan Wall, Public Works Director

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EXHIBIT "A"

Los Angeles to Anaheim Rail Traffic Study Peer Review

(Attached)

TECHNICAL MEMORANDUM

DATE: January 27, 2026
TO: Travis Kaya, Richards, Watson & Gershon
FROM: Jose Alire/Robert Vu, Urban Crossroads, Inc.
JOB NO: 16965-01 Traffic Peer Review

SUBJECT: LOS ANGELES TO ANAHEIM RAIL TRAFFIC STUDY PEER REVIEW

Urban Crossroads, Inc. has completed the following Traffic Study Peer Review of the Section 3.2 Transportation of the Los Angeles to Anaheim Project Section Draft EIR/EIS report (prepared by California High-Speed Rail Authority on December 2025; referred to as **EIR**). Specifically, this Traffic Study Peer Review will review portions relating to the Los Angeles to Anaheim Rail in the City of Vernon.

PROJECT OVERVIEW

California High-Speed Rail Authority (**Authority**) proposes to build, operate, and maintain an electric-powered High-Speed Rail (**HSR**) system in California, connecting the San Francisco Bay Area and Central Valley to Southern California. When completed, the nearly 800-mile train system would provide new passenger rail service to more than 90 percent of the state's population. As estimated, 200 weekday trains would serve the statewide intercity travel market. The system would use state-of-the-art, electrically powered, steel-wheel-on-steel-rail technology, including contemporary safety, signaling, and automated train control systems, with trains capable of operating at speeds of up to 220 miles per hour in HSR sections that are fully grade separated and on a dedicated track alignment.

The HSR system, as illustrated on **Exhibit 1**, would be implemented in two phases. Phase 1 would connect San Francisco to Los Angeles and Anaheim via the Pacheco Pass and the Central Valley. Phase 2 would extend the HSR system from the Central Valley (starting at the Merced Station) to the state's capital in Sacramento and from Los Angeles to San Diego.

The Los Angeles to Anaheim Project Section (project section) would extend approximately 30 miles from Los Angeles to Anaheim, as depicted on **Exhibit 2**. The project section starts at the northern edge of U.S. Highway 101 and ends at ARTIC. The HSR project is closely interrelated with the Los Angeles County Metropolitan Transportation Authority's (Metro) Link Union Station (Link US) Project, of which the Authority is the federal lead agency. As part of the Link US Project, Metro would build platforms at LAUS, tracks, and the viaduct that crosses over U.S. Highway 101 and comes down to grade at First Street, which could be used by HSR trains. From north of U.S. Highway 101 to First Street, the Authority would only build the overhead contact system over the shared tracks to power HSR trains; this portion of the overhead contact system is considered to be part of the Los Angeles to Anaheim Project Section and is included in this Draft EIR/EIS.

EXHIBIT 1: IMPLEMENTATION PHASES



Source: Authority 2024b

EXHIBIT 2: LOS ANGELES TO ANAHEIM PROJECT SECTION CORRIDOR



Source: Authority 2025
Draft alignments, elements not to scale

TRAFFIC ANALYSIS PEER REVIEW

The comments below should be addressed to finalize the EIR.

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1) *Page 3.2-33, Table 3.2-4 Environmental Baselines for the Project.* The baseline conditions represent 2015 traffic conditions. Significant changes to the traffic network and/or traffic patterns likely occurred throughout the study area since 2015.

   Appendix 3.2-C Baseline Traffic Count Validation Results, Page 3, Table 2: Change in Roadway Segment Volumes between 2015 Traffic Counts and May 2023 Traffic Counts. The EIR stated that counts were originally collected in September through November of 2015. Additional 2023 counts were conducted to evaluate the change in traffic conditions. The roadway segment of Garfield Avenue from Telegraph Road to Washington Boulevard was shown to have a -29% change in roadway segment volumes.

   Recommendation: It is recommended that the baseline conditions be reevaluated for the roadway segments and intersections to validate the findings in the report.

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2) *Page 3.2-34, Table 3.2-4 Environmental Baselines for the Project.* The Horizon Year conditions represent 2040 traffic conditions. The current long-range forecast years are typically 2045 or 2050.

   Recommendation: With the change in baseline conditions in Comment #1 and change in forecast years of the current traffic models, it is recommended that the baseline and forecast years are to be reevaluated or validated with current data.

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3) *Page 3.2-34, Section Traffic Data Sources.* The EIR states that traffic counts were performed on typical weekdays, with most traffic counts taken during typical peak periods of 7 a.m. to 9 a.m. and 4 p.m. to 6 p.m., between September 2015 and November 2015 on typical weeks without holidays, and while schools were in session. PM peak hours can occur at soon as 3 PM in some locations.

   Recommendation: It is recommended that the peak periods should be confirmed with the 24-hour average daily traffic counts to ensure that the peak hour has been evaluated.

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4) *Page 3.2-35, Section Traffic Growth Project.* The EIR utilizes the SCAG 2020 RTP/SCS Travel Demand Model, which has a 2020 baseline year and a 2045 forecast year.

   Recommendation: It is recommended that the findings in the EIR should be validated with the latest SCAG 2024 RTP/SCS Travel Demand Model, which has a 2050 horizon year.

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5) *Page 3.2-35, Section Trip Generation, Distribution, and Assignment for Station Operational Trips, Paragraph 2.* The EIR assumed that traffic patterns and routes from trip origins to HSR stations (and vice versa) remained the same between 2016 and 2023. Traffic patterns have significantly changed after the COVID-19 pandemic. As previously identified in Comment #1, the roadway

0830 segment of Garfield Avenue from Telegraph Road to Washington Boulevard was shown to have a -29% change in roadway segment volumes.

Recommendation: It is recommended that the baseline conditions be reevaluated for the roadway segments and intersections.

0831 6) *Pages 3.2-36 to 3.2-39, Tables 3.2-5 to 3.2-10.* The traffic capacities appear to be consistent with the identified/corresponding traffic engineering methodology.

0832 7) *Page 3.2-39, Section Freeway Ramp Traffic Operational Standards.* The EIR states that queue lengths were calculated at freeway on-ramp and off-ramp locations where project trips would add 100 or more trips in the peak hour to the ramp. The 50 peak hour trip threshold is the industry standard traffic engineering threshold to study an intersection. Caltrans' LDR Safety Review Practitioner's Guidance states that a safety review is required if the project makes modifications in the state highway system or the project adds trips by any mode on the state highway system. Specifically, if the Project adds two or more car lengths to the ramp queue that will extend into the freeway mainline, then the location must be reviewed for traffic safety impacts.

Recommendation: It is recommended that the EIR include intersections that fit the Caltrans safety review requirements. A safety evaluation should be conducted to ensure that queuing does not extend onto the freeway mainline or local arterials. Caltrans should be consulted for the study area intersections to be included in the EIR traffic analysis.

0833 8) *Page 3.2-39, Section Level of Service for Construction and Operational Phases and Page 3.2-42, Section 3.2.4.4 Method for Evaluating Impacts Under NEPA.* The EIR lists traffic impact criteria for various facilities. However, jurisdictions within the study area identify traffic impacts with a lower change in traffic performance. (i.e., City of Anaheim states a traffic impact is significant when an intersection operating at LOS E or F has an increase in V/C of 0.01 and City of Santa Fe Springs states that any addition of project traffic to a signalized intersection operating at LOS E or F requires improvements).

Recommendation: It is recommended that the EIR provide sources for the impact thresholds.

0834 9) *Page 3.2-48, Section 3.2.5.2 Intersection and Roadway Segment Level of Service.* The following intersections are currently deficient (LOS E or F) within or near the City of Vernon:

- G95, Indiana Street and Bandini Boulevard
- G98, Atlantic Boulevard/I-710 northbound ramps and Bandini Boulevard
- G101, I-5 southbound ramps and Bandini Boulevard

Page 3.2-59, Table 3.2-16 Intersection Level of Service, Horizon Year 2040 No Project. The following additional intersections are deficient (LOS E or F) under 2040 No Project traffic conditions within or near the City of Vernon, in addition to those identified above:

- G84, Downey Road and Washington Boulevard
- G93 Sierra Pine Avenue and Bandini Boulevard

0834

- G106, Ayers Avenue and E 26th Street

Recommendation: It is recommended that reevaluation and/or validation be completed consistent with previous comments.

0835

10) *Page 3.2-48, Section 3.2.5.2 Intersection and Roadway Segment Level of Service. The following roadway segments are currently deficient (LOS E or F) within or near the City of Vernon:*

- G012, Soto Street, Washington Boulevard to E 26th Street
- G013, Downey Road, Washington Boulevard to Bandini Boulevard
- G014, E 26th Street, Downey Road to Bandini Boulevard
- G018, Garfield Avenue, Washington Boulevard to Telegraph Road
- G091, Bandini Boulevard, Atlantic Boulevard, Eastern Avenue
- G092 Soto Street, E 26th Street, Bandini Boulevard
- G093 E 26th Street, Sierra Pine to Downey Road

Page 3.2-59, Table 3.2-17 Intersection Level of Service, Horizon Year 2040 No Project. The following roadway segments are deficient (LOS E or F) under 2040 No Project traffic conditions within or near the City of Vernon:

- Soto Street, E 26th Street to Washington Boulevard
- Downey Road, Bandini Boulevard to Washington Boulevard
- E 26th Street, Downey Road to Bandini Boulevard
- Garfield Avenue, Telegraph Road to Washington Boulevard
- Bandini Boulevard, Atlantic Boulevard to Eastern Avenue
- Soto Street, E 26th Street to Bandini Boulevard
- E 26th Street, Sierra Pine Avenue to Downey Road

Recommendation: It is recommended that reevaluation and/or validation be completed consistent with previous comments.

0836

11) *Page 3.2-73, Section Construction Impacts, Table 3.2-20 Temporary Construction Roadway Closures.* The following roadways would experience construction impacts:

- Downey Road/ Grande Vista Avenue – short-term lane or roadway closures
- E 26th Street (Vernon)/ Pennington Way – intermittently closed to permanently closed when the relation is complete
- Indiana Street – occasional closures during reconstruction of E 26th Street until the permanent closure of E 26th Street
- Bonnie Beach Place – occasional closures during reconstruction of E 26th Street until the permanent closure of E 26th Street
- Ayers Avenue – occasional closures during reconstruction of E 26th Street until the permanent closure of E 26th Street
- Atlantic Boulevard – short-term lane or roadway closures
- Eastern Avenue – short-term lane or roadway closures with intermittent lane closures or full closures to trench and relocated utilities into right-of-way
- E 26th Street (Commerce) – occasional closures during modification of Commerce Yard

0836

- Bandini Boulevard – intermittent lane closures or full closures to trench and relocated utilities into right-of-way

The EIR states that various locations will experience access restrictions and other circulation impacts over an anticipated 5.5-year period. Roadway closures and detour routes will likely increase traffic delays and queuing at nearby intersections, including the SR-710 & I-5 interchanges.

Recommendation: It is recommended that the identified roadway closures should include the surrounding intersections and roadways (including nearby Caltrans facilities) in the impacted area as delays may exceed 30 minutes per vehicle. Additionally, add the following:

- Closures and detours should be phased so that adjacent roadways are not closed at the same time.
- Additional details should be provided for each closure identified in Table 3.2-20, such as extend of closure, time-of-day, number of lanes closed, etc..
- Access to adjacent businesses must be maintained during the closures.

It is recommended that the identified detour routes in Table 3.2-20 be verified for accuracy and feasibility. Construction routes should avoid residential uses and sensitive receptors to the extent feasible. Redirected truck routes should ensure sufficient large truck maneuverability to and from the destination. A Construction Management Plan and safety analysis should be reviewed and approved by the City of Vernon, which should include the following:

- on-site construction phasing
- site access/haul routes
- pedestrian and bicycle routes
- emergency vehicle access
- noise ordinance compliance
- public outreach
- street sweeping
- sight distance evaluation
- truck turning templates along detour route
- construction traffic control plans

0837

12) *Page 3.2-90, Section Impact TR-7: Permanent Impacts on Freeway Mainline Segments and Ramps During Construction.* The EIR states that no impacts on freeway segments or ramps are anticipated during project construction. However, the EIR previously stated that "the project could lead to temporary disruption of transportation system operations because of increased construction-related traffic from material deliveries and spoils removal, construction equipment, and worker trips to and from the construction site." The aforementioned construction truck traffic will likely increase traffic delays and queuing at the Caltrans freeway intersections along the construction route.

Recommendation: It is recommended that Caltrans facilities near construction and project areas be evaluated to Caltrans satisfaction.

0838

13) *Page 3.2-102, Table 3.2-28 Signalized Intersections: Horizon Year 2040 Impacts with Inclusion of Norwalk/Santa Fe Springs High-Speed Rail Station Option.* The following intersections are stated to have a significant increase in delay with Inclusion of Norwalk/Santa Fe Springs High-Speed Rail Station Option:

- G84 Downey Road and Washington Boulevard
- G94 Downey Road and Bandini Boulevard
- G96 Bonnie Beach Place and Bandini Boulevard
- G98 Atlantic Boulevard/I-710 NB ramps and Bandini Boulevard

Page 3.2-108, Table 3.2-33 Major Roadway Segments: Horizon Year 2040 Impacts for Shared Passenger Track Alternatives A and B. The following roadway segment are stated to have a significant increase in delay with Inclusion of Norwalk/Santa Fe Springs High-Speed Rail Station Option:

- Bandini Boulevard from Downey Road to Atlantic Boulevard

Additional local roadway segments may be impacted under all project alternatives and options.

Recommendation: It is recommended that reevaluation and/or validation be completed consistent with previous comments.

0839

14) *Page 3.2-123, 3.2.7.2 TRAN-MM#2: Restripe Intersections.* The following improvements are not feasible and may be significant and avoidable:

- G96 Bonnie Beach Place and Bandini Boulevard (inclusion of Norwalk/Santa Fe Springs HSR Station Option):
  - Convert southbound right-turn lane to left-/right-turn lane
- G98 Atlantic Boulevard/I-710 northbound ramps and Bandini Boulevard (inclusion of Norwalk/Santa Fe Springs HSR Station Option):
  - Convert westbound right-turn lane (to I-710) to through-right lane
  - Convert northbound through lane (to Atlantic Boulevard) to left-turn lane (to I-710)

Recommendation: It is recommended that feasible mitigation measures be provided to improve traffic operations to the extent agreeable by the City of Vernon. The identified improvements are not currently feasible within existing right-of-way. A concept plan should be prepared for each mitigation measure showing proposed improvements, receiving lanes, adjacent property impact, PED/bike facilities impacts, utility relocation, etc..

0840

15) *Page 3.2-126, 3.2.7.4 TRAN-MM#4: Add Exclusive Turn Lanes to Intersections.* The following improvements are not feasible and may be significant and avoidable:

- G84 Downey Road and Washington Boulevard (inclusion of Norwalk/Santa Fe Springs HSR Station Option):
  - Add one westbound left-turn and right-turn lanes
  - Add one eastbound left-turn and right-turn lane
  - Add one southbound left-turn and right-turn lane
  - Add one northbound left-turn and right-turn lane

0840

- G94 Downey Road and Bandini Boulevard (inclusion of Norwalk/Santa Fe Springs HSR Station Option):
    - Add left-turn lanes to the southbound approach
    - Add right-turn lanes to the northbound approach
- G96 Bonnie Beach Place and Bandini Boulevard (inclusion of Norwalk/Santa Fe Springs HSR Station Option):
    - Add two right-turn lanes to the southbound approach
- G98 Atlantic Boulevard/I-710 northbound ramps and Bandini Boulevard (inclusion of Norwalk/Santa Fe Springs HSR Station Option):
    - Add one southbound right-turn lane
    - Add one left-turn lane to the westbound approach
    - Add two left-turn lanes to the northbound approach
    - Add one right-turn lane to the northbound and southbound approaches

Recommendation: It is recommended that feasible mitigation measures be provided to improve traffic operations to the extent agreeable by the City of Vernon. Existing utilities may be required to be relocated to accommodate these improvements. The identified improvements are not currently feasible within existing right-of-way. A concept plan should be prepared for each mitigation measure showing proposed improvements, receiving lanes, adjacent property impact, PED/bike facilities impacts, utility relocation, etc..

0841

16) *Page 3.2-128, 3.2.7.5 TRAN-MM#5: Add New Lanes to Roadway.* The following improvements are not feasible and may be significant and avoidable:
    - Bandini Boulevard, Downey Road to Atlantic Boulevard (Shared Passenger Track Alternatives A and B, inclusion of Norwalk/Santa Fe Springs HSR Station Option, and inclusion of Fullerton HSR Station Option):
        - Add one westbound through lane
        - Add one eastbound through lane

Recommendation: It is recommended that feasible mitigation measures be provided to improve traffic operations to the extent agreeable by the City of Vernon. Existing utilities may be required to be relocated to accommodate these improvements. On-street parking may need to be prohibited. The identified improvements are not currently feasible within existing right-of-way. A concept plan should be prepared for each mitigation measure showing proposed improvements, receiving lanes, adjacent property impact, PED/bike facilities impacts, utility relocation, etc..

CONCLUSIONS

Our review of the EIR suggests that the analysis is missing some key details. The comments should be addressed to finalize the traffic analysis.

If you have any questions, please contact me directly at jalire@urbanxroads.com and rvu@urbanxroads.com.

ATTACHMENT A

PROPOSED DETOUR ROUTES



EXHIBIT A: TEMPORARY CONSTRUCTION ROADWAY CLOSURES

URBAN CROSSROADS

16965 – ACAD\16965_EIR_Exhibits_A.dwg – 1/26/26 – JG

EXHIBIT "B"

Letter of Agreement (LOA) for Project Planned through
the State Transportation Improvement Program (STIP)

(Attached)

RESOLUTION NO. 7732

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF VERNON APPROVING AND AUTHORIZING THE EXECUTION OF A LETTER AGREEMENT FOR PROJECTS PROGRAMMED THROUGH THE STATE TRANSPORTATION IMPROVEMENT PROGRAM BY AND BETWEEN THE CITY OF VERNON AND THE LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY FOR FUNDING OF THE I-710 ATLANTIC/BANDINI INTERCHANGE IMPROVEMENTS, PHASE I

WHEREAS, the City of Vernon anticipates the completion of the Project Report and Environmental Impact Report for the proposed improvements to the I-710 Atlantic/Bandini Interchange (the "Project") to occur within the next five months; and

WHEREAS, the improvements proposed in the Project will be constructed in two phases with Phase I to consist of local improvements and Phase II to consist of the reconfiguration of on and off ramps at the I-710 Atlantic/Bandini interchange and improvements at the Atlantic/Bandini interchange; and

WHEREAS, a major portion of the required right-of-way will be acquired as part of Phase I, which will extend 26th Street across Atlantic Boulevard to 1st Street, requiring the construction of a bridge over Atlantic Boulevard and the construction of public utilities; and

WHEREAS, in order for the City of Vernon to proceed to Phase I, it must obtain the necessary approvals and obligate funds; and

WHEREAS, Phase I is to be funded by the City of Vernon and the Los Angeles Regional Transportation Improvement Program ("RTIP"); and

WHEREAS, the Los Angeles County Metropolitan Transportation Authority ("MTA") is the administering agency for RTIP monies; and

/ / /

WHEREAS, as part of the MTA 1998 and 2000 State Transportation Improvement Programs ("STIPs"), the MTA and the California Transportation Commission authorized the programming of funds to the City of Vernon for the Project, subject to the terms and conditions of a STIP Letter of Agreement; and

WHEREAS, in order to obligate RTIP funds, the City of Vernon is required to enter into a STIP Letter of Agreement with MTA; and

WHEREAS, the total cost for Phase I is $15,153,000.00, with the City's share being $5,353,000.00 and the MTA's share being $9,800,000.00; and

WHEREAS, by letter dated March 14, 2001, Bruce V. Malkenhorst, the City Administrator/City Clerk, has recommended approval of the STIP Letter of Agreement with MTA for the programming of funds to the City of Vernon for the Project.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF VERNON AS FOLLOWS:

SECTION 1: The City Council of the City of Vernon hereby finds and determines that the recitals contained hereinabove are true and correct.

SECTION 2: The City Council of the City of Vernon hereby approves the Letter of Agreement For Projects Programmed Through The State Transportation Improvement Program, a copy of which is attached hereto as Exhibit "A" and made a part hereof.

SECTION 3: The City Council of the City of Vernon hereby authorizes the City Administrator/City Clerk to execute said Letter Agreement for, and on behalf of, the City of Vernon.

/ / /

/ / /

SECTION 4: The City Council of the City of Vernon hereby directs the City Clerk, or his designee, to transmit one executed Letter Agreement to:

Los Angeles County Metropolitan Transportation Authority
Attn: Jimmy X. Chen, Ph.D, Project Manager
One Gateway Plaza, Mail Stop 99-22-3
Los Angeles, CA 90012-2825

SECTION 5: The City Clerk of the City of Vernon shall certify to the passage of this resolution, and thereupon and thereafter the same shall be in full force and effect.

APPROVED AND ADOPTED this 21st day of March, 2001.

LEONIS C. MALBURG, Mayor

ATTEST:

BRUCE V. MALKENHORST, City Clerk

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I, BRUCE V. MALKENHORST, City Clerk of the City of Vernon, do hereby certify that the foregoing Resolution, being Resolution No. 7732, was duly adopted by the City Council of the City of Vernon at a regular meeting of the City Council duly held on Wednesday, March 21, 2001, and thereafter was duly signed by the Mayor of the City of Vernon.

BRUCE V. MALKENHORST, City Clerk

(SEAL)

EXHIBIT

A

Metropolitan
Transportation
Authority

One Gateway Plaza
Los Angeles, CA
90012-2952

February 14, 2001

Samuel Kevin Wilson, P.E., L.S.
Director of Community Services and Water
City of Vernon
4305 Santa Fe Avenue
Vernon CA, 90058

RE: LETTER OF AGREEMENT (LOA) FOR PROJECTS PROGRAMMED THROUGH THE STATE TRANSPORTATION IMPROVEMENT PROGRAM (STIP)

Samuel Kevin Wilson:

As part of the MTA 1998 State Transportation Improvement Program (STIP), the Los Angeles County Metropolitan Transportation Authority (MTA), at its meeting of June 25, 1997, and the California Transportation Commission (CTC), at its meeting of January 14, 1998, authorized the programming of funds to **the City of Vernon for the I-710 Atlantic/Bandini Interchange Improvements, Phase I**, subject to the terms and conditions contained in this STIP Letter of Agreement (LOA).

The terms and conditions of this LOA consist of the following and each is incorporated by reference herein as if fully set forth herein: Specific Terms of the LOA, General Terms of the LOA, Attachment A - the Programmed Budget, Attachment B - the Financial Plan, Attachment C - the Scope of Work, and any other attachments or documents referenced therein.

Please acknowledge your acceptance and agreement to the terms and conditions of this LOA by signing below.

Very truly yours,

Julian Burke
Chief Executive Officer

Accepted and Agreed to:

By:

Name: _____
Title: _____
Date: _____

For Agency Use Only STPL#_____

LOA #_____

STATE TRANSPORTATION IMPROVEMENT PROGRAM
LETTER OF AGREEMENT

PART I
SPECIFIC TERMS OF THE LOA

1. Title of the Project (the "Project"): the I-710 Atlantic/Bandini Interchange Improvements, Phase I

2. Amount of Funds Programmed (the "Funds"): $9,800,000. MTA Board action of June 25, 1997, and CTC approval of January 14, 1998, programmed funds to Project Sponsor for the Project for one (1) year, Fiscal Year (FY) 2000-2001.

3. The Funding Agency for this Project (the "Agency") is: CALTRANS
The Programming Agency for this Project is the MTA.

4. Reports and Certifications to be submitted to MTA by Project Sponsor:
   - Quarterly Narrative Update on Project progress
   - Copies of all reports and information submitted to the Agency

5. Pursuant to Part II Section 7.2, Project Sponsor will submit to MTA copies of Agency Grant Applications, "Request for Approval/To Proceed" documents (Caltrans Form FNM-76), and/or Fund Transfer Agreements and/or the Fund Request it submits to the CTC. The Fund Request shall be administratively approved by the MTA CEO or his designee before it is submitted to the CTC.

6. Programmed Budget (the "Programmed Budget") for the sources of funds programmed for the Project is attached to this LOA as Attachment A.

7. Financial Plan (the "Financial Plan") for the Project is attached to this LOA as Attachment B.

8. Scope of Work (the "Scope of Work") for the Project is attached to this LOA as Attachment C.

10. No material changes to the Programmed Budget or the Scope of Work shall be funded or allowed without prior written approval of the MTA and the project sponsor. Prior approval of the CTC may also be required by Caltrans. Such prior approval shall be evidenced by an amendment to this LOA approved and signed by the MTA Chief Executive Officer or his designee and Project Sponsor. Project Sponsor shall give advance notice to MTA of all proposed changes to the Programmed Budget or Scope of Work and both parties shall participate in any application to the CTC for revised or supplemental Project funding if such an application is required by Caltrans.

11. MTA's Address:

Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012
Attention: Jimmy Chen

12. Project Sponsor's Address:

City of Vernon
Samuel Kevin Wilson, P.E., L.S.
Director of Community Services and Water
4305 Santa Fe Avenue
Vernon CA, 90058

PART II
GENERAL TERMS OF THE LOA

1. **PAYMENT OF FUNDS**. Project Sponsor shall receive the Funds directly from the Agency pursuant to a separate agreement with the Agency. **Project Sponsor cannot be reimbursed for any cost incurred without prior authorization from the Agency.** Project Sponsor shall be subject to, and comply with, all applicable requirements of the Agency and of the MTA as required by MTA to fulfill its responsibilities as the programming agency. The allowability of expenditures, the cost reimbursement schedule, eligibility issues, resolution of disputes, and all other issues relating to this LOA shall be subject to the rules, regulations, and requirements of the Agency and MTA as the programming agency.

2. **TERM**. The term of this LOA shall commence upon execution of this LOA and shall terminate upon the completion of all of the following, unless terminated earlier as provided herein:(i) the time at which the agreed upon Scope of Work, as more particularly described in Attachment C attached hereto (the "Scope of Work"), has been completed and signed-off by the MTA Project Manager; (ii) all Agency audit requirements have been met; (iii) all MTA and Agency reporting requirements have been satisfied; (iv) all applicable requirements of the Agency have been met, and (v) the final disbursement of the Funds has been made to Project Sponsor.

3. **INVOICE BY PROJECT SPONSOR**. Project Sponsor shall submit invoices to the Agency in the form, manner, and schedule specified by the applicable requirements of the Agency.

4. **USE OF FUNDS**.

4.1 Project Sponsor shall utilize the Funds to complete the Project as described in the Scope of Work and in accordance with the applicable requirements of the Agency.

4.2 Attachment C shall constitute the agreed upon Scope of Work between MTA and Project Sponsor for the Project. The Funds, as programmed under this LOA, can only be used towards the completion of this Scope of Work. Project Sponsor shall also be subject to and comply with all applicable requirements of the Agency administering this Project in regards to changes in the Scope of Work and/or Project schedule.

5. **REPORTING AND AUDIT REQUIREMENTS**.

5.1 Project Sponsor shall be subject to and comply with all applicable requirements of the Agency regarding Project reporting and audit requirements. *Project sponsor should use the STPL#, the MTA Project ID# and the PPNO# on all correspondence.*

5.2 Since this Project is funded exclusively with State/Federal funds and contains no MTA local funding, MTA as the Programming Agency has no audit responsibilities on this Project. Instead, Project Sponsor and Agency shall conduct such compliance, pre-award and performance audits as deemed necessary to assure funding expenditures conform to the terms of this LOA and all applicable Project funding guidelines, laws and regulations.

5.3 In addition Project Sponsor shall submit the Quarterly Expense Report and the Quarterly Progress Report to the MTA (on the last day of the months of November, January, April, and July). The Quarterly Expense Report and Quarterly Progress Report shall include information that documents:

- How much was invoiced
- The amount of the project complete
- Which milestones were met
- Remaining milestones and funds to complete the project
- Revised quarterly cash flow
- Revised schedule to complete the project
- Summary invoices
- If no activity has occurred during a particular quarter, Project Sponsor will still be required to submit the Quarterly Expense Report indicating no dollars were expended that quarter and the Quarterly Progress Report documenting the reason for no activity

All supporting documents must include a clear justification and explanation of their relevance to the Project. **[Note to Project Sponsor: Please be sure that your scope of work and Project milestones are consistent with the lapsing policy stated in Part II section 7.1.]**

6. **EXPENDITURE AND DISPOSITION OF FUNDS**.

6.1 The expenditure and disposition of the Funds by Project Sponsor shall be subject to and in accordance with the terms and conditions of this LOA and the applicable requirements of the Agency. Project Sponsor shall not utilize the Funds in any other way or on any other project than that specified in this LOA and the applicable requirements of the Agency.

6.2 Project Sponsor shall be responsible for any and all cost overruns for the Project.

6.3 Project Sponsor shall be eligible for the Funds up to the programmed amount specified in Part I, Section 2 of this LOA subject to the terms and conditions contained herein and in all applicable requirements of the Agency.

6.4 Subject to the requirements and regulations of the Agency, and to the extent allowed by the Agency, any underruns to the Programmed Budget shall be apportioned between MTA and Project Sponsor in the same proportion as the Sources of Funds from each party to this

LOA as specified in Attachment A to this LOA. Upon completion of the Project described in the Scope of Work and subject to the requirements and regulations of the Agency, and to the extent allowed by the Agency, any unused allocation of the Funds shall revert back to MTA for future programming at MTA's discretion.

6.5 The programming of the Funds does not imply nor obligate any future funding commitment on the part of MTA or the Agency.

7. TIMELY USE OF FUNDS / REPROGRAMMING OF FUNDS.

7.1 The following is the MTA's understanding of the state requirements for timely use of funds, as such; the terms of this section are subject to change by Caltrans and/or the CTC.

- Programmed funds are available for a project specific allocation vote by the CTC only until the end of the Fiscal Year (FY) for which they are programmed. The project sponsor must present Caltrans District 7 with a completed project specific allocation request at least 60 days in advance of the CTC's meeting in June of the applicable Fiscal Year. An allocation request will not be considered complete by Caltrans unless it includes MTA concurrence.

- After funds are allocated by a specific vote of the CTC for construction or capital purchase, the Project Sponsor has twelve (12) months to award a contract; otherwise, funds may be rescinded by the CTC and the MTA will not be responsible for replacing them.

- After award of a contract, the Project Sponsor has up to thirty-six (36) months to complete such contract and expend and receive reimbursement of the expenditures.

- Funds allocated by the CTC for project development or right-of-way costs must be expended by the second Fiscal Year following the year in which the funds were allocated.

The deadline for the project specific allocation vote can be extended by the CTC, but only if the CTC's action occurs by June of the Fiscal Year in which the funds are programmed. The possible CTC extensions are one time and for up to 20 months, but only if the CTC finds that an unforeseen and extraordinary circumstance beyond the control of the project sponsor has occurred that justifies the extension.

Following the allocation, at the end of the period allowed for expenditure and reimbursement of expenditures, subject to the requirements and regulations of the Agency and the CTC, and to the extent allowed by the Agency and the CTC, Project Sponsor shall relinquish any Funds not reimbursed to the State Highway Account for future programming at the CTC's discretion.

Assuming the above allocation and project development/right-of-way expenditure and reimbursement deadlines have been met, funds programmed for FY 2000-01 are subject to lapse on June 30, 2004. Funds programmed for FY 2001-02 are subject to lapse on June 30, 2005. Funds programmed for FY 2002-03 are subject to lapse on June 30, 2006.

Prior to an allocation, a STIP amendment reprogramming funds to a later year will postpone the application of the lapsing provision. However, this request must be made 90 days prior to the last CTC meeting of the Fiscal Year prior to the Fiscal Year in which the funds are programmed. The CTC will not amend the STIP to change the program year of the funding after the beginning of the fiscal year for which the project is programmed. Sponsors may request a one-time extension to the allocation deadline as noted above.

7.2 Project Sponsor must execute this LOA by the last day of February of the first Fiscal Year in which the Funds are programmed and demonstrate evidence of timely obligation of Funds programmed for the Project within the time period described in Part II, Section 7.1 of this LOA. Evidence of timely obligation includes a signed "Request for Approval/To Proceed" document (Caltrans Form FNM-76), a signed Grant Application document with the Agency or Fund Request Project Sponsor submits to the CTC.

7.3 In the event this LOA is not executed and/or evidence of timely obligation of the Funds is not provided as described in Part II, Sections 7.1 and 7.2 of this LOA, the Project will be reevaluated by MTA and MTA may apply to the CTC for deobligation and reprogramming of Funds. In the event the Funds are deobligated or reprogrammed, this LOA shall automatically terminate without further action by either party.

8. **DEFAULT.** A Default under this LOA is defined as any one or more of the following: (i) Project Sponsor fails to comply with the terms and conditions contained herein; or (ii) Project Sponsor fails to perform satisfactorily or makes a material change, as determined by MTA at its sole discretion, to the Plan, the Scope of Work, or the Programmed Budget without MTA's prior written consent or approval as provided herein or (iii) Project Sponsor is in default with the Agency.

9. **REMEDIES.**

9.1 In the event of a Default by Project Sponsor, MTA shall provide written notice of such Default to Project Sponsor with a 30-day period to cure the Default. In the event Project Sponsor fails to cure the Default, or commit to cure the Default and commence the same, within such 30-day period and to the satisfaction of MTA, MTA may apply to the CTC for deobligation and reprogramming of Funds. In the event the Funds are deobligated or reprogrammed, this LOA shall automatically terminate without further action by either party.

9.2 Effective upon receipt of written notice of termination from MTA, Project

Sponsor shall not undertake any new work or obligation with respect to this LOA unless so directed by MTA in writing.

9.3 The remedies described herein are non-exclusive. MTA shall have the right to enforce any and all rights and remedies herein or which may be now or hereafter available at law or in equity.

10. OTHER TERMS AND CONDITIONS.

10.1 This LOA, along with the applicable requirements of the Agency, constitutes the entire understanding between the parties, with respect to the subject matter herein. The LOA shall not be amended, nor any provisions or breach hereof waived, except in writing signed by the parties who agreed to the original LOA or the same level of authority.

10.2 In the event that there is any legal court (e.g. Superior Court of the State of California, County of Los Angeles, or the U.S. District Court for the Central District of California) proceeding between the parties to enforce or interpret this LOA, or the applicable requirements of the Agency, to protect or establish any rights or remedies hereunder, the prevailing party shall be entitled to its costs and expenses, including reasonable attorneys' fees.

10.3 Neither the MTA nor any officer or employee thereof shall be responsible for any damage or liability occurring by reason of anything done or omitted to be done by Project Sponsor under or in connection with any work performed by and or service provided by Project Sponsor, its officers, agents employees and subcontractors under this LOA. Project Sponsor shall fully indemnify, defend and hold the MTA, and its officers, agents and employees harmless from and against any liability and expenses, including without limitation, defense costs, any costs or liability on account of bodily injury, death or personal injury of any person or for damage to or loss of risk of property, any environmental obligation, any legal fees and any claims for damages of any nature whatsoever arising out of: (i) misuse of the Funds by Project Sponsor, or its officers, agents, employees or subcontractors; (ii) breach of the Project Sponsor's obligations under this LOA; or (iii) any act or omission of the Project Sponsor, or its officers, agents, employees or subcontractors in the performance of the work or the provision of the services, including, without limitation, the Scope of Work described in this LOA.

10.4 Neither party hereto shall be considered in default in the performance of its obligations hereunder to the extent that the performance of any such obligation is prevented or delayed by unforeseen causes including acts of God, acts of a public enemy, and government acts beyond the control and without fault or negligence of the affected party. Each party hereto shall give notice promptly to the other of the nature and extent of any such circumstances claimed to delay, hinder, or prevent performance of any obligations under this LOA.

10.5 Project Sponsor shall comply with and insure that work performed under this LOA is done in compliance with Federal Agency Regulations (FAR), Generally Accepted

Accounting Principles (GAAP), all applicable provisions of federal, state, and local laws, statutes, ordinances, rules, regulations, and procedural requirements and the applicable requirements and regulations of the Agency, the CTC and MTA.

10.6 Project Sponsor shall not assign this LOA, or any part thereof, without written consent and prior approval of the MTA Chief Executive Officer or his designee, and any assignment without said consent shall be void and unenforceable.

10.7 This LOA shall be governed by California law. If any provision of this LOA is held by a court of competent jurisdiction to be invalid, void, or unenforceable, the remaining provisions shall nevertheless continue in full force without being impaired or invalidated in any way.

10.8 The terms of this LOA shall inure to the benefit of, and shall be binding upon, each of the parties and their respective successors and assigns.

10.9 Project Sponsor agrees that all literature, advertisements, brochures, video, radio and public service announcements, construction site signs, and all other materials relating to the Project and distributed to the public will contain recognition of the MTA's contribution as well as the approved METRO logo. If applicable, Project Sponsor agrees to display the METRO logo on its buses, shuttle buses, vans, and taxis utilized for services provided under this Project. The METRO logo is a copyrighted symbol, which shall be reproduced and displayed in accordance with specific graphic guidelines available from the MTA Graphics Department at the address in Part I, Section 10 of this LOA. Project Sponsor agrees to follow directions of the MTA Marketing Department to comply with this Section of the LOA.

10.10 Notice will be given to the parties at the address specified in Part I, Sections 11 and 12 unless otherwise notified in writing of change of address.

10.11 Project Sponsor in the performance of the work required by this LOA is not a contractor nor an agent or employee of the MTA and attests to no organizational or personal conflicts of interest and agrees to notify the MTA immediately in the event that a conflict, or the appearance thereof, arises. Project Sponsor shall not represent itself as an agent or employee of the MTA and shall have no powers to bind the MTA in contract or otherwise.

ATTACHMENT A

STIP - Letter of Agreement (LOA)
PROGRAMMED BUDGET - SOURCES OF FUNDS

SOURCES OF FUNDS	FY 1999-00	FY 2000-01	FY 2001-02	FY 2002-03	FY 2003-04	TOTAL BUDGET	% OF BUDGET
MTA Programmed Funds:							
State TIP		$ 9,800,000				$9,800,000	64.7%
Federal TEA							
Sponsor Funding Commitment:							
City of Vernon		$5,353,000				$5,353,000	35.3%
TOTAL PROGRAMMED BUDGET		$15,153,000				$15,153,000	100.0%

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ATTACHMENT B

STIP - Letter of Agreement (LOA)
FINANCIAL PLAN

SOURCES OF FUNDS	PRIOR ALLOCATION	FY / 01-02 QTR 1	FY / 01-02 QTR 2	FY / 01-02 QTR 3	FY / 01-02 QTR 4	FY/ 02-03 QTR 1	FY/ 02-03 QTR 2	FY/ 02-03 QTR 3	FY/ 02-03 QTR 4	FUTURE REQUEST	TOTAL BUDGET
LOCAL											
State TIP											
Federal TEA											
Proposition C 25%											
Proposition C 40%											
Local Match		$44,965	$3,884,780	$44,965	$44,965	$333,332	$333,332	$333,332	$333,332		$ 5,353,000
Other (Specify Source)											
STATE											
STIP		$ 83,250	$ 7,113,250	$ 83,250	$ 83,250	$ 609,250	$ 609,250	$ 609,250	$ 609,250		$ 9,800,000
Other (Specify Source)											
FEDERAL											
CMAQ											
RSTP											
TEA											
FTA 5307 (Section 9)											
FTA Section 3											
Other (Specify Source)											
TOTAL BUDGET		$128,215	$10,998,030	$128,215	$128,215	$942,582	$942,582	$942,582	$942,582		$ 15,153,000

C:\TIPMOU\STIPLOA-B

ATTACHMENT C

SCOPE OF WORK

The configuration of the existing I-710/I-5 freeways is such that there is no direct connection between the northbound I-5 freeway and the southbound I-710 freeway, nor between the northbound I-710 freeway and the southbound I-5 freeway. Therefore, Atlantic Boulevard serves as the direct connector between the northbound I-5 freeway and the southbound I-710 freeway, as well as between the northbound I-710 freeway and the southbound I-5 freeway. All traffic between the I-710 freeway and the I-5 freeway in the northbound and the southbound directions must pass through the Atlantic/Bandini Intersection and Interchange. Furthermore, the I-710/Atlantic Avenue/Bandini Boulevard Intersection and Interchange is a key link in the intermodal logistics chain between the Ports of Long Beach and Los Angeles, and the Burlington Northern Santa Fe (BNSF) Hobart Yards and the Union Pacific (UP) Redondo Junction Rail Yards.

Due to its mounting traffic congestion at the I-710/Atlantic/Bandini Intersection and Interchange, improvements to this Intersection and Interchange will: (1) reduce congestion and queuing on the I-710; (2) significantly improve conditions for trucks traveling in and out of the BNSF and UP Rail Yards; (3) assist Port-generated truck movements which exit the I-710 at Atlantic Ave./Bandini Blvd. to reach the BNSF and UP Rail Yards; and (4) help preserve a critical manufacturing center in the Los Angeles region by facilitating the transportation of raw materials/supplies and finished goods in and out of the area.

This project as funded consists of two phases. Phase I, which the MTA has approved $9.8 million of STIP funds for and represents local improvements providing an arterial bypass route around the proposed interchange, consists of the following elements:

- construction of the 26th Street extension including a bridge over Atlantic Boulevard. The extension of 26th Street will require the construction of a new City owned and maintained bridge over existing Atlantic Boulevard. The proposed bridge will span approximately 76.88 meters;
- construction of the new 1st Street, which will connect the 26th Street extension to Bandini Boulevard; and
- acquisition of property necessary for the before mentioned projects (363.98 meters long) and a loop on-ramp (400 meters long).

Phase I will be funded with STIP Regional Improvement Program (RIP) funds and local match. The total project cost of Phase I (inflated dollars) is estimated to be $15.153 million. With RIP funds providing $9.8 million (64.7% of the total project cost) for this project, the City of Vernon will provide the remaining $5.353 million (35.3% of the total project cost) as local match.

STIP - Letter of Agreement (LOA)

Project Schedule

	Phase I	
	Begin	End
PA&ED		June-2001
PS&E	July-2001	July-2002
R/W Acquisition	July-2001	July-2002
R/W Support		
Construction	Sep-2002	Jun-2003
Construction Support	Sep-2002	Jun-2003

STIP LOA ATTACHMENT D

REPORTING & EXPENDITURE GUIDELINES

REPORTING PROCEDURES

- Quarterly Expense Report (Attachment D1) and Quarterly Progress Report (Attachment D2) are required for all projects. No funds will be disbursed unless these reports have been submitted and approved by the MTA based on the Letter of Agreement (LOA) Reporting Schedule.

- The Quarterly Progress Report covers all activities related to the project. It is essential that Grantee provides complete and adequate response to all the questions. In cases where there are no activities to report, or problems causing delays, clear explanation, including actions to remedy the situation, must be provided.

- The Quarterly Expense Report lists all costs incurred. The expenses listed must be supported by appropriate documentation such as invoices, receipts, time sheets, etc. Every invoice or receipt must be accompanied with a clear explanation of its purpose and its relevance to the project.

- The Quarterly Expense Report must reflect the proportionate share of local match, including in-kind, charged to the grant. **If reported charges to local match are below the committed ratio (grant to local match) as indicated in the project LOA, Caltrans may automatically adjust the grant payment accordingly or payment may be withheld.**

- Quarterly reports are due the last day of the months of Novemeber, January, April and July. Reporting schedule is based on the fiscal year as follows:

Quarter	*Report Due Date*
July –September	November 30
October – December	January 31
January – March	April 30
April – June	July 31

Upon completion of the Project a final report that includes project's final evaluation must be submitted.

EXPENDITURE GUIDELINES

- Any activity or expense charged above and beyond the approved Scope-of-Work (MOU Attachment C), **is considered ineligible** and will not be reimbursed by the MTA unless **prior written authorization** has been granted by the MTA Chief Executive Officer or his designee.

- Any expense charged to the grant or local match, including in-kind, must be clearly and directly related to the project.

- Any activity or expense charged as local match cannot be applied to any other MTA-funded or non-MTA-funded projects; activities or expenses related to a previously funded project can not be used as local match for the current project.

- Administrative cost is the ongoing expense incurred by the grantee for the duration of the project and for the direct benefit of the project as specified in the Scope-of-Work (Attachment C). Examples of administrative costs are personnel, office supplies, and equipment. As a condition for eligibility, all costs must be necessary for maintaining, monitoring, coordinating, reporting and budgeting of the project. Additionally, expenses must be reasonable and appropriate to the activities related to the project.

- MTA is not responsible for, and will not reimburse any costs incurred by the Grantee prior to the execution of the MOU, unless **written authorization** has been granted by the MTA Chief Executive Officer or her designee.

- The MOU is considered executed when the MTA Chief Executive Officer or her designee signs the document.

DEFINITIONS

- Local Participation: Where local participation consists of "in-kind" contributions rather than funds, the following contributions may be included:
    - Costs incurred by a local jurisdiction to successfully complete the project. Examples include engineering, design, rights-of-way purchase, and construction management costs.
    - Donations of land, building space, supplies, equipment, loaned equipment, or loaned building space dedicated to the project.
    - Donations of volunteer services dedicated to the project.
    - A third-party contribution of services, land, building space, supplies or equipment dedicated to the project.

- Allowable Cost: To be allowable, costs must be reasonable, recognized as ordinary and necessary, consistent with established practices of the organization, and consistent with

industry standard of pay for work classification.

- Excessive Cost: Any expense deemed "excessive" by MTA staff will be adjusted to reflect a "reasonable and customary" level. For detail definition of "reasonable cost", please refer to the Federal Register *OMB Circulars A-87 Cost Principals for State and Local Governments; and A-122 Cost Principals for Nonprofit Organizations*.

- In-eligible Expenditures: Any activity or expense charged above and beyond the approved Scope-of-Work is considered in-eligible.

STIP - Letter of Agreement (LOA)

FOR MTA USE ONLY
CFP # _____
DATE RECEIVED _____
PROJECT MANAGER _____

LOA ATTCHMENT D1

QUARTERLY EXPENSE REPORT

Project _____

Sponsor _____

MOU Number _____

Fiscal Year ☐ FY 1999-00 ☐ FY 2000-01 ☐ FY 2001-02 ☐ FY 2002-03

☐ FY 2003-04 ☐ FY 2004-05 ☐ FY 2005-06 ☐ FY 2006-07

Project Quarter ☐ (Jan-Mar) ☐ (Apr-Jun) ☐ (Jul-Sep) ☐ (Oct-Dec)

Report Number: _____ Date Submitted : _____

Percent of Project Completed _____

Milestones Tasks Completed

Grant to Local Match Ratio *1 _____

	STIP Grant	Local Match (include in-kind)	Total
This Quarter *2			
Total Project Budget			
Funds Expended to Date (include this Quarter)			
Balance			

I certify that I am the responsible fiscal officer of and that to the best of my knowledge and belief the information stated above is true and correct.

Signature: _____ Title: _____

Name : _____ Date: _____

**1 Local Match must be spent in the appropriate proportion to STIP grant with each quarter payment.*

**2 The amounts shown here must equal to the total amounts listed on page 2 of this form.*

ITEMIZED LISTING OF THIS QUARTER EXPENSES AND CHARGES

1. All expenses and charges, including grant and local match, must be itemized and listed below. Each item listed must be verifiable by an invoice and/or other proper documentation. The total amounts shown here must be equal to this quarter's expenditures listed on page 1 of this form. All expenses and charges must be reflective of the approved budget and rates as shown in the MOU Attachment C, Scope of Work. **Summary copies of invoices submitted to Caltrans for reimbursement shall be attached and included with this Quarterly Expense Report and must indicate for which milestone tasks in the scope of work the expenses were for.**

	ITEM	INVOICE #	TOTAL EXPENSES/ CHARGES	CHARGE to STIP GRANT	CHARGE to LOCAL MATCH
1.			$	$	$
2.			$	$	$
3.			$	$	$
4.			$	$	$
5.			$	$	$
6.			$	$	$
7.			$	$	$
8.			$	$	$
9.			$	$	$
10.			$	$	$
11.			$	$	$
12.			$	$	$
13.			$	$	$
14.			$	$	$
15.			$	$	$
16.			$	$	$
	TOTAL		$	$	$

Notes:

1. The total amounts shown on the Itemized Listing (page 2) must match the amount shown for this quarter expenses on page 1.
2. Local match spent in each quarter, must be in the appropriate proportion to MTA grant.
3. All receipts, invoices, and time sheets, attached and included with this quarter Expense Report must be listed and shown under the Invoice Number column, of the Itemized Listing (page 2).
4. **Copies of invoices submitted to Caltrans for reimbursement shall be attached and included with this Quarterly Expense Report must indicate for which milestone tasks in the scope of work the expenses were for.**

STIP - Letter of Agreement (LOA)

FOR MTA USE ONLY	
CFP #	
Date Received	
Project Manager	

STIP LOA ATTACHMENT D2

QUARTERLY PROGRESS REPORT

INSTRUCTIONS

Pursuant to the terms specified in the MTA TIP Call For **Projects Letter of Agreement**, grantee must submit a Quarterly Progress Report on the last day of the months of October, January, April and July. Please complete this questionnaire and return to your respective MTA Modal Team representative.

SECTION I: GENERAL INFORMATION

1. Project's Report Schedule:

Fiscal Year ☐ FY 1999-00 ☐ FY 2000-01 ☐ FY 2001-02 ☐ FY 2002-03

☐ FY 2003-04 ☐ FY 2004-05 ☐ FY 2005-06 ☐ FY 2006-07 ☐ (Jan-Mar)

☐ (Apr-June) ☐ (July-Sept) ☐ (Oct-Dec)

2. Date Submitted: _____ **Report Number :** _____

3. Project Sponsor: _____

4. Project Title:

5. PPNO, and EA #'s:

6. Modal Category:

7. MTA Modal Team Representative:

8. Project Sponsor Representative:

STIP - Letter of Agreement (LOA)

SECTION II: QUARTERLY REPORT

1. DELIVERABLES & MILESTONES

*List deliverables and milestones scheduled for this quarter as stated in the **LOA.***

2. STATUS REPORT

*Describe tasks accomplished this quarter based on the approved schedule of deliveries (**LOA** Attachment C, Scope of Work).* ***Also list remaining tasks and schedule to complete the project.***

3. PROBLEMS

Describe unanticipated problem areas and how they have been/will be resolved. (this quarter only)

4. MARKETING (if applicable)

List and describe types of marketing efforts/strategies implemented this quarter. Please provide samples if applicable.

SUPPORTING DOCUMENTS

CITY COUNCIL

LEONIS C. MALBURG
Mayor

THOMAS A. YBARRA
Mayor Pro-Tem

WM. "BILL" DAVIS
Councilman

H. "LARRY" GONZALES
Councilman

W. MICHAEL MCCORMICK
Councilman

BRUCE V. MALKENHORST
City Administrator / City Clerk
FAX (323) 581-7924



CITY HALL
4305 SANTA FE AVENUE, VERNON, CALIFORNIA 90058
TELEPHONE (323) 583-8811

EDUARDO OLIVO
City Attorney
FAX: (562) 927-8722

KEVIN WILSON
Director of Community Services & Water
FAX: (323) 588-2761

KENNETH J. DeDARIO
Director of Municipal Utilities
FAX: (323) 583--1983

STEVEN E. PARKER
Fire Chief
FAX: (323) 581-1385

BRUCE W. OLSON
Police Chief
FAX: (323) 583-5236

April 5, 2001

Los Angeles County Metropolitan Transportation Authority
Attn: Jimmy X. Chen, Ph.D, Project Manager
One Gateway Plaza, Mail Stop 99-22-3
Los Angeles, CA 90012-2825

Re: Letter of Agreement for Projects Programmed Through the State Transportation Improvement Program.

Dear Mr. Chen:

Transmitted herewith is a copy of Resolution No. 7732 and an executed original copy of the Letter of Agreement for Projects Programmed Through the State Transportation Improvement Program approved by City Council at their meeting held March 21, 2001.

If you have any questions regarding this matter, please call Kevin Wilson at 323/583-8811 ext. 245.

Very truly yours,

Gloria J. Orosco
Chief Deputy City Clerk

GJO:ng

cc: Kevin Wilson/Resolution No. 7732
Resolution No. 7732
Agreement File No. 01-017

Metropolitan
Transportation
Authority

One Gateway Plaza
Los Angeles, CA
90012-2952

February 14, 2001

Samuel Kevin Wilson, P.E., L.S.
Director of Community Services and Water
City of Vernon
4305 Santa Fe Avenue
Vernon CA, 90058

RE: LETTER OF AGREEMENT (LOA) FOR PROJECTS PROGRAMMED THROUGH THE STATE TRANSPORTATION IMPROVEMENT PROGRAM (STIP)

Samuel Kevin Wilson:

As part of the MTA 1998 State Transportation Improvement Program (STIP), the Los Angeles County Metropolitan Transportation Authority (MTA), at its meeting of June 25, 1997, and the California Transportation Commission (CTC), at its meeting of January 14, 1998, authorized the programming of funds to **the City of Vernon for the I-710 Atlantic/Bandini Interchange Improvements, Phase I**, subject to the terms and conditions contained in this STIP Letter of Agreement (LOA).

The terms and conditions of this LOA consist of the following and each is incorporated by reference herein as if fully set forth herein: Specific Terms of the LOA, General Terms of the LOA, Attachment A - the Programmed Budget, Attachment B - the Financial Plan, Attachment C - the Scope of Work, and any other attachments or documents referenced therein.

Please acknowledge your acceptance and agreement to the terms and conditions of this LOA by signing below.

Very truly yours,

Julian Burke
Chief Executive Officer

Accepted and Agreed to:

By: _____

Name: _____
Title: _____
Date: _____

EXHIBIT "C"

Noise Section 3rd Party Review

(Attached)

TECHNICAL MEMORANDUM

DATE: January 27, 2026
TO: Travis M. Kaya, RWG Law
FROM: Bill Maddux, Urban Crossroads, Inc.
JOB NO: 16965-02

SUBJECT: CALIFORNIA HIGH-SPEED RAIL, LOS ANGELES TO ANAHEIM PROJECT SECTION EIR/EIS - NOISE SECTION 3RD PARTY REVIEW

Urban Crossroads, Inc. is pleased to provide the third-party review of the California High-Speed Rail, Los Angeles to Anaheim Project Section EIR/EIS - Noise Section, prepared by the California High-Speed Rail Authority, December 2025. The Project improvements would occur between the Los Angeles Union Station (LAUS) and the Anaheim Regional Transit Intermodal Center (ARTIC), which includes improvements in the City of Vernon, CA.

The Project involves the addition of High-Speed Rail (HSR) along the Los Angeles – San Diego – San Luis Obispo (LOSSAN) Rail Corridor, between Los Angeles and Irvine, with station locations at Los Angeles Union Station (LAUS), Norwalk/Santa Fe Springs, Anaheim, and Irvine. Additionally, a light maintenance facility is proposed at 26th Street to facilitate 24 train sets. The purpose of this 3rd Party Review is to establish technical adequacy and identify potential concerns that should be included in the analysis.

FINDINGS

- The noise section analyzes noise and vibration impacts related to both temporary construction activity and long-term operation of the Project using the Federal Transit Authority's noise and vibration methods and standards.
- The noise section indicates that no noise-sensitive receivers within the City of Vernon that are located within 1,000 feet of the Project boundary.
- Construction phases would include demolition, site preparation, grading, building construction, paving, and architectural coatings.
- The dominant source of noise in the Project site vicinity is vehicular traffic from local roadways.
- Due to the absence of noise-sensitive receivers within 1,000 feet of the Project boundaries, a detailed analysis of noise impacts was not required based on FTA methodologies.
- The noise and vibration analysis relies on the FHWA Roadway Construction Noise Model (RCNM) inputs and the Federal Transit Authority (FTA) methodologies.

SPECIFIC COMMENTS

0842

1. **Vibration-Sensitive Receivers –** The analysis does not consider the adjacent business as a vibration-sensitive receiver and therefore does not assess vibration impacts adjacent to the

0842

HSR alignment. However, there is no evidence in the analysis that a survey was conducted of these businesses to verify whether or not they would be considered a Type I land use category where vibrations may interfere with interior operations. As stated by the FTA, the Type I "category includes buildings where vibration levels, including those below the threshold of human annoyance, would interfere with operations within the building." It is recommended that the analysis include a survey of the business within 200 feet of the HSR alignment and the 26th Street LMF to verify that there are no Type I land uses near the track due to the potential for increased vibration.

0843

CONCLUSIONS:

Our review of the California High-Speed Rail, Los Angeles to Anaheim Project Section EIR/EIS - Noise Section suggests that the analysis of construction is generally acceptable; however, the vibration analysis does not adequately evaluate the impacts resulting from changes to the existing condition, as required by CEQA. Additionally, since the analysis fails to disclose these changes, it seems to fall short of the National Environmental Policy Act (NEPA) requirements to disclose the environmental impacts of the Project or Action. If you have any questions, please contact me directly at (619) 788-1971.

22.25 Response to Submission 013836 (Nicholas Ghirelli, City of Vernon, Feb 3, 2026)

22.25.1 0804

Impacts associated with traffic delays and congestion are not considered California Environmental Quality Act (CEQA) impacts (Public Resources Code Section 21099(a); State CEQA Guidelines Section 15064.3; refer to *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 43 Cal.App.5th 609, 625-626).

Potential project-related impacts related to the changes around Hobart Yard are discussed in individual sections of Chapter 3, Affected Environment, Environmental Consequences, and Mitigation Measures, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS), including Section 3.2, Transportation, for traffic; Section 3.11, Safety and Security, for emergency access; and Section 3.12, Socioeconomics and Communities, for business acquisitions. Please refer to responses to comments #0805 through #0843 below for more detailed responses to the City of Vernon's concerns.

22.25.2 0805

The commenter requests that the California High-Speed Rail Authority (Authority) locate the light maintenance facility (LMF) at 15th Street in Los Angeles to avoid introducing more heavy rail impacts on Vernon. To clarify, if the Authority were to select Shared Passenger Track Alternative B, which includes the 15th Street LMF, the project footprint in Vernon and its potential impacts would be almost identical to those of Shared Passenger Track Alternative A. Section 2.6.5.4, Freight and Passenger Railroad Modifications, of the Draft EIR/EIS explains that even without the 26th Street LMF, the modifications at Hobart Yard are still necessary, including the realignment of 26th Street. Figure 2-77 in the Draft EIR/EIS illustrates Hobart Yard without the 26th Street LMF.

The Authority acknowledges the City of Vernon's concerns regarding the design of 26th Street. Traffic impacts were evaluated thoroughly in Section 3.2 of the Draft EIR/EIS, with mitigation measures proposed in the city that would reduce all adverse traffic effects to below the impact thresholds. However, in response to the City of Vernon's concerns, the Authority developed a design concept that could maintain the 26th Street connection east to Pennington Way, but additional discussions are needed with the California Department of Transportation (Caltrans) and other parties. Given the current status of the Los Angeles to Anaheim Project Section (project section), which has no funding for preliminary design or construction, the Authority has opted to maintain the design presented in the Draft EIR/EIS. The Authority commits to working with the City of Vernon in the future as this project section advances, including refining the design of 26th Street and conducting further environmental review if necessary.

Note that Section 3.2.7, Mitigation Measures, of the Draft EIR/EIS was revised in Section 16.5.2, Section 3.2: Transportation, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS to clarify that the Authority would coordinate with local jurisdictions on the traffic mitigation measure design.

22.25.3 0806

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18, Standard Responses.

Regarding the commenter's request to alter the modifications to Hobart Yard, refer to response to comment #0805 above.

22.25.4 0807

The Authority respectfully disagrees with the commenter's assertions that the Draft EIR/EIS fails to properly analyze potential impacts under CEQA or to take the requisite "hard look" at environmental consequences under the National Environmental Policy Act (NEPA). The impact analysis for the Shared Passenger Track Alternatives is thorough and provides the information required by both CEQA and NEPA. Refer to Section 3.1, Introduction, of the Draft EIR/EIS for a description of the

approach to the environmental impact analysis. Note that the modifications to Hobart Yard were not called out and analyzed separately in every Chapter 3 section of the Draft EIR/EIS, but they were still analyzed as part of the overall project using the appropriate resource study area (RSA) for each environmental resource topic. Some sections, such as air quality and hazardous materials, include site-specific discussions of the Hobart Yard modifications to disclose the localized, site-specific impacts directly attributable to them. Refer to responses to comments #0808 to #0822 below.

22.25.5 0808

The Authority has reviewed the attached peer review of the traffic analysis (referred to as the Traffic Peer Review), which asserts the Draft EIR/EIS contains deficiencies. Refer to responses to comments #0826 to #0841 below for specific responses to the Traffic Peer Review.

22.25.6 0809

The Authority determined that the continued use of 2015 as a baseline year for traffic was appropriate after conducting a validation analysis during preparation of the Draft EIR/EIS. In light of the age of the traffic count data and to account for any changes in conditions related to traffic demand and pattern changes following the COVID-19 pandemic, the Authority reviewed the data to determine if they still remained valid for the impact analysis. Appendix 3.2-C, 2015 Baseline Conditions Traffic Counts Validation, documents the Authority's traffic validation, which followed standard travel demand modeling and traffic forecasting practices appropriate for evaluating long-term future conditions. As detailed in Appendix 3.2-C, the Authority established thresholds to determine whether a substantial change in traffic volumes, traffic patterns, and vehicle miles traveled (VMT) had occurred. The Authority collected new traffic counts in May 2023 and October 2023 and compared the data against the 2015 counts. Although localized differences—both increases and decreases—were observed at certain intersections and roadway segments, the differences all fell within the thresholds of acceptable variances and, therefore, the overall network-level validation was satisfied. The comparison of the 2015 traffic counts with the more recent data indicated that traffic patterns had not changed substantially at the network level to trigger a need to change the baseline numbers. Additionally, as described in Appendix 3.2-C, the Authority supplemented the 2023 count data with traffic count data specifically around Hobart Yard, which were collected in July 2021; this presented a more up-to-date picture of logistics truck traffic, especially in Vernon.

The comment does not identify a transportation impact under CEQA. Vehicle delay and level of service (LOS) are not considered significant environmental impacts (refer to Public Resources Code Section 21099 and State CEQA Guidelines Section 15064.3(b)(1)). VMT is the sole measure of transportation impacts under CEQA (refer to State CEQA Guidelines Section 15064.3). The baseline traffic counts referenced in the comment are unrelated to VMT.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.7 0810

Regarding the request to revise the design of 26th Street, refer to response to comment #0805 above.

The commenter incorrectly asserts that the Ayers Avenue/Bandini Boulevard intersection was not studied. As a point of clarification, Section 3.2 of the Draft EIR/EIS focuses on intersections and roadway segments that would be adversely affected by the project. Given the volume of traffic analysis data, the detailed information on all of the intersection and roadway segments is included in full in the *Los Angeles to Anaheim Project Section Transportation Technical Report*, available upon request (this is noted throughout Section 3.2.6, Environmental Consequences, for each of the impact discussions). Several of the intersections and roadway segments in Vernon would not have adverse traffic effects, and therefore are not listed in Section 3.2. The Ayers Avenue/Bandini Boulevard intersection is included in the traffic analysis as intersection G97. As discussed under Impact TR-11, an adverse effect would occur at intersection G97 only with inclusion of the Norwalk/Santa Fe Springs High-Speed Rail (HSR) Station Option. For the Shared Passenger Track Alternatives, where no HSR station options are included, intersection G97 would not experience an adverse traffic effect and installation of a traffic signal is not needed. Should the Authority choose to include the Norwalk/Santa

Fe Springs HSR Station Option in the project, the Authority will work with the City of Vernon in later phases of the project to refine mitigation measures, including installation of a traffic signal at this intersection.

The commenter also incorrectly asserts there was no base year of study in the traffic analysis. The traffic analysis used two baselines, Existing Year (2015) and Horizon Year (2040). In the Existing Year scenario, the Ayers Avenue/Bandini Boulevard intersection performs at LOS C in both peak hours. As described in Section 3.2.4.3, Methods for Impact Analysis, the Horizon Year 2040 scenario was developed by applying growth factors from the Southern California Association of Governments' (SCAG) 2020 Regional Transportation Plan (RTP)/Sustainability Communities Strategy (SCS) Travel Demand Model. Therefore, the traffic analysis used appropriate baseline scenarios.

The comment does not identify a transportation impact under CEQA. Vehicle delay and LOS are not considered significant environmental impacts (Public Resources Code Section 21099; State CEQA Guidelines Section 15064.3(b)(1)).

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.8 0811

The commenter incorrectly asserts that Section 3.11 does not address geometric design hazards. Section 3.11.4.5, Method for Determining Significance Under CEQA, includes the CEQA threshold: "Substantially increase hazards from a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses." Impact SS-6 discusses the potential impacts related to this CEQA threshold and explains that all permanent roadway modifications, including roadway realignments, would be designed to comply with applicable design standards so that no traffic hazards would be introduced.

The commenter states that a traffic signal would be needed at the Ayers Avenue and Bandini Street intersection as a result of the 26th Street design. The Ayers Avenue/Bandini Boulevard intersection is included in the traffic analysis as intersection G97, and is analyzed under Impact TR-11 in Section 3.2. This intersection is currently unsignalized and there is a center median along Bandini Boulevard, so that traffic coming from Ayers Street is limited to right turns only onto Bandini Boulevard. This existing configuration would be maintained under the Preferred Alternative; no changes are proposed and therefore no new hazards would be introduced.

As a point of clarification, as discussed in Impact TR-11, intersection G97 would not experience an adverse traffic effect, and therefore installation of a traffic signal (i.e., TRAN-MM#3, Add Signal to Intersection to Improve Level of Service/Operation) is not proposed in this location. However, in the scenario where the Norwalk/Santa Fe Springs HSR Station Option is included, there would be an adverse effect at intersection G97. Therefore, under this scenario, a new traffic signal (TRAN-MM#3) is proposed as mitigation at this location.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.9 0812

The commenter states that Section 3.11 analysis inaccurately characterizes the modified roadways as "minor streets," and therefore the analysis inaccurately minimizes and fails to address impacts near Hobart Yard. As a point of clarification, Section 3.11 of the Draft EIR/EIS specifically analyzes the potential impacts of the road closures proposed between Sheila Street and Washington Boulevard. These are "local streets," as defined in the City of Vernon General Plan. They are designed to serve the existing businesses in this area and are not intended to facilitate through traffic. The terms "minor street" and "local street" are used interchangeably in the Draft EIR/EIS.

The commenter asserts that rerouting 26th Street would have major traffic impacts. Potential traffic impacts related to the rerouting of 26th Street are analyzed in Section 3.2, in Impacts TR-2, TR-3, and TR-4, with mitigation measures proposed where LOS impacts would exceed the thresholds. The commenter refers to impacts from installing a new traffic signal near the Interstate 710 southbound ramp; the Authority assumes the commenter is referring to the Ayers Avenue/Bandini Boulevard intersection, which is the closest one to the freeway ramp. A new signal is not proposed at this

intersection under the Preferred Alternative; refer to response to comment #0811 above for more details regarding this topic.

The commenter also requests that Section 3.11 evaluate emergency response impacts from the 26th Street realignment and Bandini Boulevard traffic. Impact SS-2 was revised in Section 16.5.11, Section 3.11: Safety and Security, in the Final EIR/EIS to specifically address response times in Vernon. Refer to Chapter 16 of the Final EIR/EIS for these revisions. As stated in Section 16.5.11, although there would be changes in vehicle circulation and potential increases in travel times as a result of the 26th Street realignment, these changes would not impair response times.

Finally, as stated in response to comment #0805 above, the Authority commits to working with the City of Vernon in future phases of the project to identify alternate alignments for 26th Street that could maintain the direct connection to Pennington Way.

22.25.10 0813

The commenter incorrectly asserts that impact avoidance and minimization features (IAMF) are not adequate mitigation. IAMFs are project features, not mitigation measures. IAMFs reflect standard practices and design features that provide specific means to avoid and reduce impacts. They represent enforceable features and commitments the Authority incorporates into project design and construction specifications that avoid and minimize environmental impacts, as described in the impact analysis for each resource section (refer to Appendix 2-A, Impact Avoidance and Minimization Features). IAMFs described in the Draft EIR/EIS are not discretionary coordination efforts as the commenter suggests, but rather detailed project features that include specific performance standards and require regulatory compliance. As such, IAMFs are not deferred mitigation. TR-IAMF#2, Construction Transportation Plan, requires the contractor to prepare a detailed construction transportation plan for the project, with a performance standard of minimizing the impact of construction and construction traffic on adjoining and nearby roadways to the extent practicable, in close consultation with the local jurisdiction having authority over the site. TR-IAMF#2 identifies at least 13 elements that must be included in construction transportation plan's traffic control plans. The traffic control plans must be coordinated with the local jurisdiction with authority, providing a mechanism both for design review of the traffic control plans and monitoring. Similarly, SS-IAMF#1, Construction Safety Transportation Management Plan (CSTMP), requires the preparation of a CSTMP with a stated performance measure of maintaining emergency vehicle access during the construction period. SS-IAMF#1 also requires that the CSTMP be coordinated with the local jurisdiction with authority. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.11 0814

The extent of the 26th Street LMF that would be built within the extent of the Exide site is depicted on Figure 3.10-2. Details regarding excavation are provided on page 3.10-45 of the Draft EIR/EIS and also on page 6-8 of the *Los Angeles to Anaheim Project Section Hazardous Materials and Wastes Technical Report*, and indicate that the entire Exide property would be developed for construction of the LMF and that most excavation on this property would be shallow (i.e., not expected to encounter groundwater) and be limited to roadway realignment, new tracks, and building foundations, but encountering existing contaminated soil on site is expected. Estimated volumes of contaminated soil that would be generated are presented in Table 3-6 in the *Los Angeles to Anaheim Project Section Supplement to the Hazardous Materials and Wastes Technical Report*.

Permanent elements of the 26th Street LMF are specifically described on page 3.10-45 of the Draft EIR/EIS. These include support buildings, water storage, power supply, and stormwater treatment infrastructure. Additionally, there would be construction for the roadway realignment, new tracks, and other building foundations in the vicinity of the property. Detailed drawings depicting the permanent LMF structures are included in Volume 3.1 of the Draft EIR/EIS, on sheets TT-D1902, TT-D1903, and TT-D1904, which clearly identify the location of the LMF's permanent elements. All elements of the LMF were accounted for in the analysis.

Section 3.10, Hazardous Materials and Wastes, of the Draft EIR/EIS analyzes potential impacts related specifically to the Exide facility in several sections. Impact HMW-1 describes the potential risks of exposure to hazardous materials during excavation of contaminated soil and from encountering contaminated groundwater or soil vapors. Impact HMW-4 focuses on potential impacts associated with construction near sites of potential environmental concern and describes the potential construction work that would occur near or on the Exide facility and states that most excavation associated with construction of the LMF at 26th Street would be shallow and not expected to encounter any groundwater, but that encountering existing contaminated soil on site is anticipated.

The project includes multiple IAMFs that would avoid and minimize these impacts, including HMW-IAMF#1, Property Acquisition Phase I and Phase II Environmental Site Assessments, Additional Preconstruction Investigations, and Associated Actions to Control Site Contamination; HMW-IAMF#3, Work and Vapor Barriers; HMW-IAMF#4, Known, Suspected, and Unanticipated Environmental Contamination; HMW-IAMF#5, Demolition Plans; HMW-IAMF#7, Storage and Transport of Materials; HMW-IAMF#8, Permit Conditions; HMW-IAMF#9, Environmental Management System; HMW-IAMF#10, Hazardous Materials Plans; and HYD-IAMF#3, Prepare and Implement a Construction Stormwater Pollution Prevention Plan, which would limit discharges of contaminants to the environment via best management practices.

Section 3.10 acknowledges the lack of finalized information regarding the Exide facility's remediation, so it conservatively concluded that there would be a significant impact during construction (Impact HMW-4), requiring mitigation measure HMW-MM#2, Coordination of High-Speed Rail Design and Construction with Remediation of Exide Site and Orange County North Basin Superfund Site.

HMW-MM#2 requires the Authority to coordinate with the regulatory oversight agencies and responsible parties on the project design, including the Department of Toxic Substances Control, U.S. Environmental Protection Agency, Los Angeles Regional Water Quality Control Board, South Coast Air Quality Management District (SCAQMD), and City of Vernon. HMW-MM#2 also requires engagement with public interested parties at specific design milestones, which would include the City of Vernon. Even with implementation of this mitigation measure, this Authority has conservatively concluded that this impact could be significant and unavoidable given the uncertainty of remediation activities. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.12 0815

The comment asserts that the air quality analysis failed to properly account for impacts on sensitive receptors in the vicinity of Hobart Yard because the analysis only compared project construction emissions from Hobart Yard against the federally set General Conformity *de minimis* levels and failed to compare the results to the regional thresholds established by SCAQMD. The commenter is incorrect.

Impact AQ-1 in Draft EIR/EIS Section 3.3, Air Quality and Global Climate Change, summarizes temporary direct and indirect impacts of the Shared Passenger Track Alternatives relative to both (1) federal General Conformity *de minimis* levels and (2) SCAQMD thresholds. Notably, General Conformity *de minimis* levels are annual limits. SCAQMD's thresholds are daily limits. Draft EIR/EIS Table 3.3-15 lists annual construction emissions associated with Shared Passenger Track Alternative A with no HSR station option and compares emissions with federal General Conformity *de minimis* levels. Tables 3.3-17, 3.3-19, 3.3-21, 3.3-23, and 3.3-25 list the annual construction emissions associated with the other alternatives and design options.

Draft EIR/EIS Tables 3.3-16, 3.3-18, 3.3-20, 3.3-22, 3.3-24, and 3.3-26 list the daily construction emissions associated with the different Shared Passenger Track Alternatives and HSR station option emissions and compare those emissions to SCAQMD thresholds. As presented in Tables 3.3-16, 3.3-18, 3.3-20, 3.3-22, 3.3-24, and 3.3-26, during select years, nitrogen oxide emissions would exceed the SCAQMD regional project-level threshold for both Shared Passenger Track Alternatives, as well as the alternatives with inclusion of the HSR station option in either Norwalk/Santa Fe Springs or Fullerton.

Impacts AQ-7 and AQ-8 highlight potential localized health risk impacts at sensitive receptors near Hobart Yard. As presented in Draft EIR/EIS Table 3.3-37, neither Segment 5A (Hobart Yard,

Commerce Yard, 26th Street LMF, and Commerce Flyover) nor Segment 5B (Hobart Yard, Commerce Yard, and Commerce Flyover) would expose worker or residential receptors within 1,000 feet of the Hobart Yard construction area to a significant health risk impact. Refer to Section 3.3.4.4, Methods for Impact Analysis, for additional information on Segment 5A and Segment 5B.

Based on the foregoing, the Draft EIR/EIS measures project impacts against both NEPA General Conformity *de minimis* levels (annual limits) and SCAQMD's thresholds (daily limits). Accordingly, no revisions to the Draft EIR/EIS are warranted.

22.25.13 0816

The commenter expresses that the Draft EIR/EIS does not properly analyze localized impacts at Hobart Yard.

As discussed in the response to comment #0815 above, Draft EIR/EIS Section 3.3 compares the project's total construction emissions (which include modifications at Hobart and Commerce Yards) to SCAQMD regional thresholds and general conformity levels. The response to comment #0815 also addresses the modeling of localized health risk impacts at sensitive receptors in the vicinity of Hobart Yard.

The comment appears to assert that the requirement for a hot-spot analysis stems from a 2014 federal appellate decision. The case in question is in fact citing the definition of hot-spot analysis from 40 Code of Federal Regulations (CFR) Part 93.101. This section of the CFR (40 CFR Part 93) covers requirements for transportation conformity analysis. Per 40 CFR Part 93.116.(a), "FHWA/FTA project must not cause or contribute to any new localized CO [carbon monoxide], PM_{10} [particulate matter less than or equal to 10 microns in diameter], and/or $PM_{2.5}$ [particulate matter less than or equal to 2.5 microns in diameter] violations, increase the frequency or severity of any existing CO, PM_{10}, and/or $PM_{2.5}$ violations, or delay timely attainment of any [National Ambient Air Quality Standards] or any required interim emission reductions or other milestones in CO, PM_{10}, and $PM_{2.5}$ nonattainment and maintenance areas." Under Section 176 of the Clean Air Act, federally supported transportation activities must be reviewed for conformity with the applicable air quality management plan. Transportation conformity regulations are set forth at 40 CFR Part 93 Subpart A. Per 40 CFR Part 93.102(a)(iii), transportation conformity is required for projects approved, funded, or implemented by the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), or both. Notably, per 40 CFR Part 93.102.(a)(2), other than 40 CFR Part 93.121, conformity determinations are not required under 40 CFR Part 93 Subpart A for individual projects that are not FHWA/FTA projects. 40 CFR Part 93.121 pertains to a project's inclusion in a conforming transportation plan and transportation improvement program, not the hot-spot analyses requested in the comment.

No approval, funding, or implementation from FHWA or FTA is anticipated for the project. Therefore, the requested hot-spot analysis is not warranted. However, 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.

Although the project is not subject to transportation conformity, and therefore the requested hot-spot analysis is not warranted, Impact AQ-7 in Draft EIR/EIS Section 3.3 evaluated the local air quality impacts associated with construction of the Shared Passenger Track Alternatives. As presented in Tables 3.3-34 and 3.3-36, the maximum localized pollutant concentrations would be lower than both the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for all criteria pollutants. Therefore, the project would not contribute to a violation of the $PM_{2.5}$ NAAQS.

Additionally, Impact AQ-14 in Section 3.3 explains that a quantitative PM_{10}/$PM_{2.5}$ hot-spot analysis is not required because none of the project alternatives fall within the types of projects defined in 40 CFR Part 93.123(b)(1). Because the Draft EIR/EIS includes the above-referenced analyses of localized impacts, and the project is not subject to transportation conformity, no revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.14 0817

The comment questions the adequacy of a 1,000-foot screening distance in the Draft EIR/EIS's evaluation of impacts on sensitive receptors near Hobart Yard.

As discussed in Section 3.3, the 1,000-foot screening distance threshold was taken from the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB 2005). The 2005 CARB handbook (p. 17) highlights that the area of highest impact for diesel particulate matter (DPM) emissions is within 1,000 feet of a rail yard.

In addition, the distance from the project area to the modeled peak health risks was approximately 140 feet for Segment 1, 80 feet for Segment 2, 320 feet for Segment 3, and 680 feet for the rail yards. The calculated health risks decreased with distance beyond those locations for all segments. Therefore, using a 1,000-foot screening distance threshold captures the worst-case localized health risk impacts. In the Draft EIR/EIS, Impacts AQ-7 and AQ-8 highlight the potential localized health risk impacts at sensitive receptors within 1,000 feet of Hobart Yard. Draft EIR/EIS Table 3.3-37 summarized potential increases in cancer risk along study segments. As presented in this table, neither Segment 5A nor Segment 5B (both of which include Hobart Yard) would expose worker or residential receptors within 1,000 feet of the Hobart Yard construction area to a significant health risk impact. As presented in Draft EIR/EIS Table 3.3-46, project operation would not result in an incremental increase in cancer risk or chronic noncancer risks near Hobart and Commerce Yards. Finally, as presented in Draft EIR/EIS Table 3.3-47, the combined construction and operation of the project would decrease cancer and noncancer chronic risk relative to existing conditions near Hobart and Commerce Yards.

Regarding the prospective supplemental health risk assessment (HRA) to be performed near Hobart Yard per AQ-MM#4, Requirement of a Future Operational Health Risk Assessment, refer to the responses to comments #0541 and #0543 in Section 22.13, Response to Submission 013785 (Jivar Afshar, South Coast Air Quality Management District, Jan 30, 2026), in this chapter.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.15 0818

Refer to the responses to comments #0541 and #0543 in Section 22.13 in this chapter.

22.25.16 0819

The comment asserts that the project's localized health risk analysis omits key sensitive receptors in the vicinity of Hobart Yard.

Table 3.3-4 in Draft EIR/EIS Section 3.3 indicates what was modeled in the HRA. This includes both worker and residential receptors within 1,000 feet of Segment 5A: Hobart Yard, Commerce Yard, 26th Street LMF, and Commerce Flyover, as well as such receptors within the same distance from Segment 5B: Hobart Yard, Commerce Yard, and Commerce Flyover. Refer to Figure 3.3-5, sheet 3 through sheet 5, which illustrates the 1,000-foot boundary and the sensitive receptors within this boundary. All businesses and worksites within the 1,000-foot boundary were included in the HRA.

Impact AQ-7 and Impact AQ-8 in Section 3.3 highlight the potential localized health risk impacts at both the maximum residential and worker receptors in the vicinity of Hobart Yard. As presented in Draft EIR/EIS Table 3.3-37, Segment 5A and Segment 5B would not expose worker receptors within 1,000 feet of the Hobart Yard construction area to health risk impacts that exceed the air district thresholds. Additional information on Segment 5A and Segment 5B can be found in Section 3.3.4.4.

Regarding concerns about operations, refer to Draft EIR/EIS Impact AQ-15 and mitigation measure AQ-MM#4, each of which are further discussed in the responses to comments #0541 and #0543 in Section 22.13, Response to Submission 013785 (Jivar Afshar, South Coast Air Quality Management District, Jan 30, 2026), in this chapter. As presented in Table 3.3-46, during operation, the change in risk with the project is negative for both residential and worker receptors. All businesses and worksites within the 1,000-foot boundary of Hobart Yard were included in the HRA.

22.25.17 0820

Refer to Standard Response LAA-Response-Chapter 5 COMMUNITY-01: Need for Analysis of Impacts on Minority and Low-Income Communities, in Chapter 18.

The intent of Chapter 5, Community Analysis, of the Draft EIR/EIS is to evaluate whether any minority or low-income communities would experience disproportionately high or adverse project effects (DHAE). Section 5.3.4, Methods for Impact Analysis, describes the methodology of this analysis. Chapter 5's analysis builds on the analyses in Chapter 3, such as Section 3.3. Each section of Chapter 3 evaluates impacts on all properties within the RSA particular to that topic. Chapter 5 examines whether any of these impacts would disproportionately affect minority or low-income communities (as determined at a Census block group level).

The commenter raises concern that the Draft EIR/EIS does not address localized air quality impacts borne by minority and low-income communities in Vernon's Hobart neighborhood. The Hobart neighborhood includes block group 60379800161. Chapter 5 summarizes impacts at the block group level. This block group would experience a DHAE from operational air quality, as described in Section 5.7.1, Operational Air Quality, and Table 5-35. Refer to corresponding sections of Chapter 3 for further detail on specific impacts.

Operational HRAs were conducted to evaluate the cancer risk and chronic noncancer risk from DPM emissions generated by the yard equipment activities at Hobart and Commerce Yards to determine the change in health risks caused by the reconfiguration of the yards. The reconfiguration of the yards would place about 101,094 feet of storage and staging tracks, spread across 14 new tracks, adjacent to the existing Hobart Yard. The BNSF Railway (BNSF) mainline tracks would also be shifted along some locations in the project corridor. Future activity pertaining to the new tracks and BNSF mainline track shift is unknown and therefore cannot be analyzed in the HRA. Without clear activity data to analyze, it is possible that project operation at Hobart Yard could pose a health risk from exposure to DPM. Because Hobart Yard is in the low-income and minority communities of Hobart/west Commerce, east Commerce, and Hobart in Vernon, there would be a potential DHAE from exposure to DPM emissions. To help mitigate this impact, the Authority would implement AQ-MM#4, which requires that an operational HRA be conducted prior to the commencement of project operations, and requires the analysis and incorporation of additional feasible mitigation to reduce risks to the greatest extent practicable prior to project operations. For further detail, refer to the responses to comments #0541 and #0543 in Section 22.13 in this chapter.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.18 0821

The Authority has reviewed the attached peer review of the noise analysis (referred to as the Noise Peer Review). The Noise Peer Review incorrectly asserts that the Draft EIR/EIS is flawed because it does not analyze whether businesses would be considered "Type I" land uses for which vibration levels would interfere with on-site operations. As presented in Table 3.4-9 of the Draft EIR/EIS, Federal Railroad Administration (FRA) criteria define Category 1 (i.e., Type I) receptors as buildings where vibration levels, including those below the threshold of human annoyance, would interfere with operations in the building. Examples include buildings where vibration-sensitive research and manufacturing (e.g., manufacturing of computer chips) are conducted, and hospitals with vibration-sensitive equipment. Such uses are generally incompatible within the existing industrial setting in the vicinity of Hobart Yard. In accordance with FRA guidance, a detailed geographic information system (GIS) survey was conducted for the noise and vibration analysis to identify all sensitive land uses within the RSAs, as defined in Section 3.4.4.2, Definition of Resource Study Areas, of the Draft EIR/EIS. Based on this survey, no Category 1 receptors were identified at businesses near Hobart Yard.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.19 0822

The comment refers to using a 1,000-foot buffer to identify noise effects on sensitive receptors. Section 3.4.4.2 of the Draft EIR/EIS defines the RSAs that were used to identify the extent of potential impact for the noise and vibration analysis. Although the applicable RSA for potential noise impacts from maintenance facility activity is 1,000 feet, the Final EIR/EIS was revised to clarify that this distance applies to sensitive receptors with an unobstructed view of the facility and that the screening distance would be 650 feet for receptors where there are intervening buildings. For train operations, however, the applicable screening distance for sensitive receptors is 700 feet.

The commenter states that the analysis did not account for increases in train volumes that would result from installation of 101,094 feet of staging and storage tracks adjacent to Hobart Yard. Section 3.3 acknowledges the Authority has not received quantitative information from BNSF regarding future operations and that these new tracks could potentially increase freight activity in this area. However, even if more freight trains operate on these staging and storage tracks, there would not be additional noise and vibration impacts because of the distance of the yard from sensitive receptors. The new staging and storage tracks would be built south of the existing Hobart Yard, 1,500 to 2,000 feet from the closest residences north of Washington Boulevard. The existing Hobart Yard tracks would remain in the same location, and yard activities would also fall outside of the 650-foot screening distance from sensitive receptors. In addition, train operations on relocated tracks would fall outside of the 700-foot screening distance from sensitive receptors.

Although Table 3.4-4 was revised to clarify the FTA screening distance from yard activities used in situations where intervening buildings are present, this does not constitute significant new information under California Public Resources Code Section 21092.1. Therefore, recirculation of the document is not necessary.

Refer to Section 16.5.4, Section 3.4: Noise and Vibration, in Chapter 16 for these revisions.

22.25.20 0823

The commenter asserts that the Draft EIR/EIS fails to establish a finite project description and evaluates two build alternatives that are materially different, citing *Washoe Meadows Community v. Department of Parks and Recreation*. In the Washoe Meadows case, the EIR did not identify a proposed project, but rather described five completely different alternative projects. Under CEQA, the project alternatives are to include a No Project Alternative and a range of potentially feasible alternatives that would (1) meet most of the project's basic objectives, and (2) avoid or substantially lessen one or more of the project's significant adverse impacts (California Code of Regulations Title 14, Section 15126.6(c)).

As described in Chapter 2, Alternatives, of the Draft EIR/EIS, Shared Passenger Track Alternatives A and B are identical except for the location of the LMF, and they both serve the same basic objectives and purpose and need. The location of the LMF and its supporting infrastructure is the only differentiator between the two Shared Passenger Track Alternatives; therefore, the construction footprint and duration of construction for the two alternatives are nearly identical. As a result, the impacts of the two alternatives are largely similar, as summarized in Tables S-5, S-7, and S-8 of the Draft EIR/EIS. Because the LMF location is the only differentiator, the Draft EIR/EIS analyzes the two Shared Passenger Track Alternatives in a comparative way, with clear subheadings that distinguish which alternative is being discussed. The impacts of the two Shared Passenger Track Alternatives are not discussed in the aggregate. This document structure allows the public and decision-makers to easily consider the impacts of each build alternative.

The commenter also states the Draft EIR/EIS defers choosing between Shared Track Alternatives A and B. The Authority's Preferred Alternative is Shared Passenger Track Alternative A, as clearly stated throughout the Draft EIR/EIS, with a detailed description in Chapter 8, Preferred Alternative. As stated in the introduction of Chapter 2, "Shared Passenger Track Alternative A is the California Environmental Quality Act (CEQA)-proposed project pursuant to State CEQA Guidelines Section 15124."

Because the Draft EIR/EIS has a clear and consistent project description, recirculation is not required.

22.25.21 0824

Refer to Standard Response LAA-Response-Chapter 2 Alt-01: Alternatives Selection and Evaluation Process and Identification of the Preferred Alternative, in Chapter 18.

The Draft EIR/EIS evaluates a reasonable range of potentially feasible alternatives that were specifically developed to meet the basic project objectives while also substantially reducing or avoiding significant impacts. As described in Section 2.5, Alternatives Considered During Alternatives Screening Process, of the Draft EIR/EIS, the Shared Passenger Track Alternatives were developed based on extensive consideration of rail corridor and station location alternatives at both the Tier 1 and Tier 2 levels of study. Section 1.1.2, The Decision to Develop a Statewide High-Speed Rail System, explains that the Tier 1 analysis resulted in the Authority selecting the Los Angeles – San Diego – San Luis Obispo Rail Corridor (LOSSAN Corridor) between Los Angeles and Anaheim for further study at the Tier 2 level. The unique constraints of the highly urbanized area between Los Angeles and Anaheim limited the range of potentially feasible alignment alternatives for the project section.

The Tier 2 analysis focused on the precise location of the project, including facilities and station locations, as well as detailed mitigation measures to address impacts. The Authority stayed consistent with the Tier 1 decision for the use of the LOSSAN Corridor, and focused on developing an alignment that would avoid and minimize impacts by staying mostly within the existing railroad corridor and blending HSR operations with existing passenger rail services. The LMF location is the key consideration in the project-level evaluation of alternatives for the project section. The difference in LMF location between Shared Passenger Track Alternative A (the CEQA proposed project/NEPA preferred alternative) and Shared Passenger Track Alternative B presents the public and decision-makers with information about the environmental impact tradeoffs between the two alternatives. The Draft EIR/EIS identifies and discusses the potential beneficial and adverse impacts of the two alternatives evaluated as well as the No Project Alternative; this constitutes a reasonable range of feasible alternatives in compliance with the requirements of both CEQA and NEPA.

22.25.22 0825

The Authority has carefully considered the City of Vernon's comments, and made revisions in the Final EIR/EIS to clarify that when funding for the project section is secured and the design plans advance, the Authority will coordinate with the local jurisdictions where the mitigation measures are proposed to develop the mitigation measure designs in more detail. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for these revisions. The Authority has determined that recirculation is not necessary because the revisions merely amplify and clarify the text.

Regarding the request to either select Shared Passenger Track Alternative B or redesign 26th Street, refer to response to comment #0805 above. The Authority is committed to working with the City of Vernon in future phases of the project to refine the design and proposed traffic mitigation measures.

The Authority respectfully disagrees with the city's assertion of CEQA inadequacy. Refer to response to comments #0823 and #0824 above.

22.25.23 0826

Regarding concerns about baseline conditions, refer to response to comment #0809 above.

The commenter points out that the Garfield Avenue roadway segment between Telegraph Road and Washington Boulevard had a 29 percent decrease in traffic volumes. As described in Appendix 3.2-C of the Draft EIR/EIS, the threshold for a substantial change in traffic volumes was based on an average of approach volumes, not on the volumes of each individual segment. As presented in Table 1 of Appendix 3.2-C, the changes in traffic volumes met the Authority's validation criteria, because they fell within the acceptable variances. The Authority acknowledges that traffic volumes in some areas were observed to be lower in 2023 compared to 2015; however, using the 2015 data in the traffic model provided a more conservative assessment of potential impacts. Higher counts from 2015 resulted in higher traffic projections for 2040, thereby avoiding underrepresenting potential impacts and mitigation measures. Note that Section 3.2.7 was revised in the Final EIR/EIS to clarify that

detailed design and assessment of the mitigation measures will occur at a later phase in coordination with local jurisdictions. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for the text additions.

The comment does not identify a transportation impact under CEQA. Vehicle delay and LOS are not considered significant environmental impacts (refer to Public Resources Code Section 21099 and State CEQA Guidelines Section 15064.3(b)(1)). VMT is the sole measure of transportation impacts under CEQA (refer to State CEQA Guidelines Section 15064.3). Baseline traffic counts are unrelated to VMT impacts. For purposes of CEQA, no further response is required.

22.25.24 0827

The commenter expresses concern related to the 2040 Horizon Year, stating that current long-range forecast years are 2045 or 2050. As described in Section 3.2.4.3, 2040 is used as the Horizon Year because it reflects the project's assumed opening year. Regarding the commenter's concern about baseline conditions, refer to response to comment #0809 above. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.25 0828

The traffic analysis peak periods and peak hours were established based on a review of 24-hour traffic count profiles collected in the RSA. Although peak hours may vary slightly by location, applying a consistent, most commonly occurring peak hour is appropriate for this level of analysis and is standard practice in traffic analyses.

The comment does not identify a transportation impact under CEQA. Vehicle delay and LOS are not considered significant environmental impacts (Public Resources Code Section 21099; State CEQA Guidelines Section 15064.3(b)(1)). VMT is the measure of transportation impacts under CEQA (refer to State CEQA Guidelines Section 15064.3). This comment does not identify an issue associated with a VMT impact and, therefore, no further response is required for purposes of CEQA.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.26 0829

The commenter expresses concern related to the travel demand model used for the traffic analysis. As a point of clarification, the commenter incorrectly states the baseline year for the 2020 RTP/SCS is 2020, but the baseline year in the 2020 RTP/SCS is 2016.

SCAG's 2020 RTP/SCS Travel Demand Model was the most current model at the time of the transportation technical analysis was conducted for the Draft EIR/EIS. SCAG adopted the 2024–2050 RTP/SCS in April 2024, after the Authority had completed the analysis for the Draft EIR/EIS.

To assess changes in future-year conditions using the 2024 RTP/SCS growth factors, the Authority conducted a sampling analysis of locations along the corridor. Roadway link volumes were extracted from the 2024 RTP/SCS model and growth rates were calculated using the same methodology that was applied in the Draft EIR/EIS for the 2020 RTP/SCS. The horizon year used in the analysis was 2040. The selected locations included those that were not identified as affected in the Draft EIR/EIS as well as some with LOS at values of D or worse, to determine if the changes in growth rates would result in new project impacts. Note that SCAG used 2019 as the base year for its 2024 RTP/SCS to avoid anomalous transportation patterns caused by the COVID-19 pandemic, which means that the 2024 RTP/SCS portrays "normal" conditions for the growth projections (SCAG 2024a).

The following is a summary of the results, with the details included in Table 22-1 and Table 22-2:

- For most locations, volumes decreased in both the AM and PM peak hours. Accordingly, at these locations, there would be no new impacts, and the Draft EIR/EIS traffic study conclusions would remain the same.
- In five locations, volumes increased in the AM peak hour, PM peak hour, or both, but the LOS grade remained unchanged. Accordingly, at these locations, there would be no new impacts, and the Draft EIR/EIS traffic study conclusions would remain unchanged.

- In two locations (Segment Eastern Avenue from Bandini Boulevard to Commerce Way and Intersection G99, Eastern Avenue and Bandini Boulevard), volumes increased in the PM peak hour and the LOS worsened by one grade, from B to C and from C to D, respectively, for the segment and intersection. However, this did not trigger a new impact, and the Draft EIR/EIS traffic study conclusions would remain unchanged because the significance standards are triggered by a change to LOS E or F.

Overall, the sampling analysis demonstrated that traffic volumes have generally decreased, or have not changed substantially, and the traffic analysis impact determinations would remain unchanged with application of the 2024 RTP/SCS volumes. Localized differences—both increases and decreases—are expected with the updated travel demand model, but the general trend is that traffic volumes have decreased in the 2024 RTP/SCS model compared to the 2020 RTP/SCS. This is consistent with overall trends of slowing population and employment growth in the SCAG region, as well as an increase in teleworking, as described in the SCAG RTP/SCS (SCAG 2024b). This is also consistent with the Authority's own ridership model, which has accounted for slowing growth throughout the state. Therefore, the Authority has determined that the 2020 RTP/SCS is appropriate for use in the Draft EIR/EIS analysis. Updating the analysis based on the most recent RTP/SCS travel demand model is therefore unnecessary.

Table 22-1 Level of Service for Selected Roadway Segments: Comparison of 2020 Regional Transportation Plan to 2024 Regional Transportation Plan

Segment	AM Peak Hour in Horizon Year 2040			PM Peak Hour in Horizon Year 2040			Impact Significant in Draft EIR/EIS?	Impact Significant with 2024 RTP?
	LOS with 2020 RTP (as listed in Draft EIR/EIS)	Percent Change: 2020 vs. 2024 RTP	LOS with 2024 RTP	LOS with 2020 RTP (as listed in Draft EIR/EIS)	Percent Change: 2020 vs. 2024 RTP	LOS with 2024 RTP		
Downey Rd from Bandini Blvd to Washington Blvd	D	-18.5%	C	F	-14.7%	E	No	No
Atlantic Blvd from Bandini Blvd to Washington Blvd	C	-47.6%	A	D	-41.7%	A	No	No
Eastern Ave from Bandini Blvd to Commerce Way	A	0.0%	A	B	11.1%	C	No	No
Telegraph Rd from Garfield Ave to Washington Blvd	A	-50.0%	A	A	-42.9%	A	No	No
Rosemead Blvd (SR 19) from Slauson Ave to Washington Blvd	E	-4.0%	E	F	7.7%	F	No	No
Slauson Ave from Passons Blvd to I-605 SB on-ramp	E	-23.3%	C	E	-20.0%	C	No	No
Washington Blvd from Indiana St to Downey Rd	A	14.3%	A	A	11.1%	A	No	No
Washington Blvd from Ayers Ave to I-710	A	12.5%	A	A	0.0%	A	No	No
Soto St from E 26th St to Bandini Blvd	F	-27.3%	D	F	-22.6%	D	No	No

EIR/EIS = environmental impact report/environmental impact statement; I = Interstate; LOS = level of service; RTP = regional transportation plan; SB = southbound; SR = State Route; vs. = versus

Table 22-2 Level of Service for Selected Intersections: Comparison of 2020 Regional Transportation Plan to 2024 Regional Transportation Plan

Intersection	AM Peak Hour in Horizon Year 2040			PM Peak Hour in Horizon Year 2040			Impact Significant in Draft EIR/EIS?	Impact Significant with 2024 RTP?
	LOS with 2020 RTP (as listed in Draft EIR/EIS)	Percent Change: 2020 vs. 2024 RTP	LOS with 2024 RTP	LOS with 2020 RTP (as listed in Draft EIR/EIS)	Percent Change: 2020 vs. 2024 RTP	LOS with 2024 RTP		
G83 Soto St & Washington Blvd	D	-6.5%	D	D	-0.5%	D	No	No
G90 Greenwood Ave & Washington Blvd	C	-5.5%	C	C	-1.5%	C	No	No
G91 Passons Blvd & Washington Blvd	D	-8.2%	D	D	0.7%	D	No	No
G99 Eastern Ave & Bandini Blvd	C	21.5%	D	C	10.0%	D	No	No
G165 Paramount Blvd & Washington Blvd	E	-2.5%	E	D	-3.7%	D	No	No
G37 Anaheim Blvd & Lincoln Ave	D	-3.9%	D	D	-3.6%	D	No	No
G67 Harbor Blvd & La Palma Ave	D	0.0%	D	F	13.7%	F	No	No
N49 Studebaker Rd & Imperial Hwy	F	-0.7%	F	F	-0.3%	F	Yes	Yes

EIR/EIS = environmental impact report/environmental impact statement; LOS = level of service; RTP = regional transportation plan; vs. = versus

22.25.27 0830

Regarding the commenter's concern about baseline conditions, refer to response to comment #809 above. Regarding the change in volumes along Garfield Avenue, refer to response to comment #826 above.

22.25.28 0831

The comment states the traffic capacities are consistent with the methodology used in the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.29 0832

The comment does not identify a transportation impact under CEQA. Vehicle delay and LOS are not considered significant environmental impacts (refer to Public Resources Code Section 21099 and State CEQA Guidelines Section 15064.3(b)(1)). VMT is the measure of transportation impacts under CEQA (refer to State CEQA Guidelines Section 15064.3). This comment does not identify an issue associated with a VMT impact and, therefore, no further response is required for purposes of CEQA. However, traffic delay remains an environmental impact under NEPA.

The commenter states that the Authority's threshold for freeway ramp analysis does not follow industry standards. The Authority respectfully disagrees with this assertion. As lead agency, the Authority developed the methodology and significance criteria used in the assessment in accordance with CEQA and NEPA guidelines. Refer to Section 3.2.4, Methods for Evaluating Impacts, for a description of the methods and impact criteria incorporated in the transportation assessment. The analysis considered freeway mainline segments that are expected to have an increase of 100 or more vehicles in the peak hour as well as freeway ramps in which there is an increase of more than 100 vehicles on the ramp. This is consistent with Caltrans' 2002 Guide for the Preparation of Traffic Impact Studies, which included a criterion of 100 peak-hour trips for state highway facilities for whether a traffic impact study is needed. The Authority used a threshold of 50 peak-hour trips for roadways and intersections, which is consistent with thresholds used by other agencies for those types of facilities.

As described in Section 3.2, Impact TR-14, there would not be an increase in trips on freeways as a result of HSR operations, and therefore the required criteria for the Local Development Review Safety Review Practitioner's Guidance are not met. However, the Authority will work with Caltrans in future phases of the project, if Caltrans identifies specific state highway system locations where additional safety evaluation would be required.

22.25.30 0833

The project is being undertaken by a state agency (the Authority). The project must conform to the policies and objectives of all applicable state and federal regulations. The Authority exercised its discretion to develop a set of guidelines, methodologies, and thresholds that it uses consistently throughout the state. The Authority will coordinate with local agencies to ensure the project is designed in a manner that is as sensitive as possible to the local environment through which it must travel while still meeting the unique design constraints of HSR service.

Consistent with CEQA and NEPA requirements, the project's consistency with local general plans and zoning regulations is discussed in Appendix 3.1-A, Regional and Local Policy Inventory and Consistency Analysis. Where the project is inconsistent with a local plan, Appendix 3.1-A also contains a discussion of the extent to which the Authority would reconcile the project with the plan as required by NEPA. Although the HSR project would degrade LOS at some intersections and segments, the project includes features and mitigation measures to minimize and avoid LOS impacts. No revisions have been made to the Draft EIR/EIS in response to this comment.

Regarding the sources for the impact thresholds, VMT metrics were used for the CEQA analysis, per State CEQA Guidelines Section 15064.3. For NEPA analysis, the Authority has established thresholds used to determine adverse effects on traffic delay caused by the project in the Authority's programmatic Environmental Methodology Guidelines.

22.25.31 0834

Refer to response to comment #0809 above.

LOS and traffic delay are considered impacts under NEPA, but are no longer considered impacts under CEQA (Public Resources Code Section 21099(b)(3); State CEQA Guidelines Section 15064.3(b)(1)). VMT is the measure of transportation impacts under CEQA (refer to State CEQA Guidelines Section 15064.3). This comment does not identify an issue associated with a VMT impact and, therefore, no further response is required for purposes of CEQA.

22.25.32 0835

Refer to response to comment #0809 above for discussion of validation efforts.

For purposes of CEQA, no further response is necessary.

22.25.33 0836

Construction-related traffic delays are not considered a CEQA impact (refer to Public Resources Code Section 21099(a), State CEQA Guidelines Section 15064.3, and *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 43 Cal.App.5th 609, 625-626). However, traffic delays are considered impacts under NEPA.

The commenter requests multiple details be added to Table 3.2-20 regarding lane closures, and that the routes be verified for accuracy. The Draft EIR/EIS evaluates conditions and potential impacts during project construction commensurate with the current level of project design and definition. At the project's present preliminary level of design, the Authority can make reasonable assumptions about where temporary lane closures and detours would be needed, based on the type of roadway modifications that would be required. Table 3.2-20 presents feasible detours that could be implemented during construction. Therefore, the Draft EIR/EIS provides future engineers and contractors with an envelope of implementation flexibility while ensuring that all project impacts are disclosed in the EIR/EIS.

The project includes IAMFs that will avoid or minimize impacts on transportation and parking during construction. The IAMFs require the contractor to develop and implement plans and actions that include industry-recognized performance standards to minimize or avoid potential construction impacts. The IAMFs include construction hours, designating parking for construction vehicles, maintaining truck routes and construction for special events during project construction, maintaining bicycle and pedestrian access, protecting freight and passenger rail services, maintaining transit access, and meeting design standards and guidance for transportation facilities.

The commenter requests several items be included in a Construction Management Plan to be reviewed and approved by the City of Vernon. Multiple IAMFs address these items, including TR-IAMF#2, which requires the preparation of a construction transportation plan and identifies a minimum of 13 elements that must be included in the traffic control plans prepared under the construction transportation plan. The traffic control plans must be coordinated with the local jurisdiction with authority, providing a mechanism both for design review of the traffic control plans and monitoring.

All project IAMFs are included in Volume 2, Appendix 2-A, of the Draft EIR/EIS.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.25.34 0837

The commenter refers to temporary impacts on circulation and access from construction-related traffic but mistakenly attributes them to Impact TR-7. Impact TR-7 describes changes in traffic after construction of permanent roadway elements associated with the project. The analysis finds that these permanent modifications would not result in impacts on freeway segments or on freeway ramp queue lengths.

Temporary impacts on circulation and access are addressed in Impact TR-1, which specifically acknowledges that construction-related trips could affect freeway facilities. The Authority would

incorporate multiple IAMFs to minimize temporary traffic impacts. These include TR-IAMF#3, Off-Street Parking for Construction-Related Vehicles; TR-IAMF#6, Restriction on Construction Hours; and TR-IAMF#7, Construction Truck Routes, which require construction worker trips and parking to occur within off-peak hours and on designated routes and locations.

The Authority coordinates regularly with Caltrans, and will continue to do so as the project progresses. No revisions have been made to the Draft EIR/EIS in response to this comment.

Circulation and access impacts or delays on freeway ramps are not an impact under CEQA (Public Resources Code Section 21099(a)).

22.25.35 0838

Refer to response to comment #0809 above.

LOS and traffic delay are no longer considered impacts under CEQA (Public Resources Code Section 21099(a)). For purposes of CEQA, no further response is required.

22.25.36 0839

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

22.25.37 0840

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

22.25.38 0841

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

22.25.39 0842

As described in the response to comment #0821 above, a detailed GIS survey was conducted for the noise and vibration analysis to identify all sensitive land uses within the RSAs in accordance with FRA guidance. Chapter 5 of the FRA High-Speed Ground Transportation Noise and Vibration Impact Assessment guidance manual provides detailed instructions on how to use GIS and what the benefits are, including the detailed information available. At locations where there might be a question regarding a specific land use, street view tools in Google Earth or Google Maps were used to verify information. Therefore, an in-person survey was not necessary. The applicable RSA for vibration impacts, including existing railroads, includes areas within 275 feet of the edge of the right-of-way for both the alignment and LMF. Based on a survey of sensitive receptors within this distance, no Category 1 (i.e., Type 1) receptors were identified at businesses near Hobart Yard.

22.25.40 0843

The comment generally states that the vibration analysis did not evaluate impacts resulting from changes to the existing condition. Potential vibration impacts were assessed using a detailed analysis based on FRA methodology, as described in Section 3.4.4.4, Methods for Impact Analysis, of the Draft EIR/EIS. A detailed assessment does not consider existing vibration conditions. Instead, the detailed assessment applies absolute vibration impact criteria based on predicted project-related vibration levels at specific frequencies. Under this methodology, an impact would occur whenever project-generated vibration exceeds the applicable FRA criterion, regardless of existing ambient vibration levels. As a result, the detailed assessment provides a more conservative analysis of impacts because it evaluates project vibration against fixed thresholds rather than relative changes from existing conditions.

Los Angeles to Anaheim - RECORD #013842 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Zulema Renteria

Stakeholder Comments/Issues:

To Whom It May Concern, Attached is the LAUSD Comment Letter for the California High Speed Rail. Please let me know if you have any questions. Thank you, Zulema J Renteria Environmental Planning Specialist Los Angeles Unified School District Office Phone (213) 241 3432 Cell Phone Email zulema.renteria@lausd.net 333 South Beaudry Avenue, 21st Floor Los Angeles, CA 90017

Los Angeles Unified School District

Office of Environmental Health and Safety

ALBERTO M. CARVALHO
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CARLOS A. TORRES
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JENNIFER FLORES
Deputy Director, Environmental Health and Safety

February 3, 2026

Stefan Galvez, Director of Environmental Services
California High Speed Rail Authority
355 South Grand Avenue, Suite 2050
Los Angeles, CA 90017

PROJECT: Los Angeles to Anaheim Project Section Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)
CASE NUMBER: SCH#2007031067

0900 Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the Los Angeles to Anaheim Project Section Draft EIR/EIS. LAUSD is concerned about the potential negative impacts of the project on our students, staff, and parents and guardians of students attending the following schools close to the project site. The Project's study area includes 2 District sites and schools located in the cities of Los Angeles.

Los Angeles Unified School District Schools Within Project Footprint

- Christopher Dena Elementary School, 1314 South Dacotah Street, Los Angeles, CA
- Eastman Avenue Elementary School, 4112 East Olympic Boulevard, Los Angeles, CA
- Extera Public School, 1942 East 2nd Street, Los Angeles, CA
- Felicitas & Gonzalo Mendez High School, 1200 Plaza Del Sol East, Los Angeles, CA
- Metropolitan High School, 727 Wilson Street, Los Angeles, Ca
- Utah Street Elementary School, 255 Gabriel Garcia Marquez Street, Los Angeles, CA
- 2nd Street Elementary School, 1942 East 2nd Street, Los Angeles, CA

Based on the extent/location of the proposed development, it is our opinion that significant environmental impacts on the surrounding community may occur. Since the project may have an environmental impact on LAUSD schools, recommended measures and conditions designed to help reduce or eliminate potential impacts are included in this response.

The Proposed Project is part of a larger California High Speed Rail system that would be the Los Angeles to Anaheim of the rail. This would be a phased construction project with the Merced to Bakersfield operation planned for early 2030s. The timeline for the Los Angeles to Anaheim portion is still to be determined.

0901 The District requests that our schools and housing sites be recognized as sensitive receptors and that the analysis in the EIR specifically addresses potential impacts to our school communities. Specific areas of concern where the Project's construction and operation would have a significant effect on District's sites include Air Quality, Hazards, Noise, and Transportation/Traffic (including pedestrian safety). Based on the extent/location of the proposed development, it is our opinion that environmental impacts on the surrounding area will likely occur. Since the project may have an environmental impact to students and residents recommended measures designed to help reduce or eliminate potential impacts are included in this response.

0902 **Work with LA Unified**

Project proponents must coordinate any construction activities with LA Unified to ensure safety of students and their families and minimize disruptions to school activities and access to campus. Effective strategies of avoiding significant impacts on school operations include:

- Completing construction activities such as demolition and excavation when the schools are not in session (summer and winter breaks, holidays, weekends, and after hours).
- Including school and District representatives to review construction management plans, construction outreach plans, and participation in weekly construction meetings.
- Obtaining prior authorization from the District for any easements and project activities on or surrounding District properties.
- Working with the District in identifying appropriate construction mitigation programs.

0903 **Air Quality**

District students and school staff should be considered sensitive receptors to air pollution impacts. To ensure that effective measures are applied to further reduce construction air pollutant impacts, we ask that the City incorporate into the project's conditions or mitigation measures the following language:

- Implement all applicable provisions of Rule 403 for fugitive dust control during construction of the Project.
- Implement all applicable provisions of Rule 1446
- Utilize low emission "clean diesel" equipment with new or modified engines manufactured to meet Tier 4 specifications or retrofitted to comply with CARB's verified diesel emission control strategy (VDECS).
- Construction vehicles shall not idle in excess of five minutes.
- Ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications.
- Water/mist soil as it is being excavated and loaded onto the transportation trucks.
- Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.
- Minimize soil drop height into transportation trucks or stockpiles during dumping.
- Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.
- Place stockpiled soil on polyethylene sheeting and cover with similar material.
- Place stockpiled soil in areas shielded from prevailing winds.
- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers).
- Install wheel washers (or steel shaker plates) where vehicles enter and exit unpaved roads onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).
- Excavation and transportation of soil known to contain hazardous substances should be limited to periods when school is not in session.

0904 **Hazards and Hazardous Materials**

The Project has the potential to transport hazards and hazardous materials during construction and operation. The following language is recommended for potential impacts related to hazards and hazardous materials.

0904

- During construction, ingress/egress routes to the construction site should be designed to ensure that trucks and construction vehicles carrying hazards and hazardous materials are routed away from District school sites. Additional recommendations are provided in this letter under the Transportation/Traffic section.

0905

Noise and Vibration

Noise and vibration created by construction and operation activities may impact District schools that are adjacent to the Project corridor. CEQA requires that such impacts be quantified and eliminated or reduced to a level of insignificance. LAUSD established maximum allowable noise levels to protect students and staff from noise impacts generated in terms of Leq. These standards were established based on regulations set forth by the California Department of Transportation. LAUSD's exterior noise standard is 67 dBA Leq and the interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels

0906

within 2 dBA of pre-project ambient level. To ensure that effective measures are employed to reduce construction related noise impacts on the campus, we ask that that the City incorporate into the project's conditions or mitigation measures the following language:

- Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when noise impacts to the schools exceed the District's noise standards.
- All pile driving equipment shall be equipped with noise control devices and/or shall implement noise buffers with minimum quieting factor of 10dBA, to the extent feasible. If possible, drilled piles are preferred to driven piles.
- Demolition activities shall be scheduled for when school is not in session.

0907

In addition, to ensure that effective measures are employed to reduce construction and operation related noise impacts on District sites, LAUSD asks that the following language be included in the control measures for noise impacts:

- A temporary noise barrier capable of reducing construction noise levels to 67 dBA Leq on all campuses located within 1000 feet shall be installed between the project corridor and the schools.
- Provisions shall be made to allow school administrators and/or their designated representative(s) to notify the contractor if construction noise levels are adversely impacting the learning environment. In this event, the contractor must implement additional noise attenuation measures or reschedule noise-generating activities to a time when school is not in session.

0908

Traffic/Transportation

LAUSD's Transportation Branch **must be contacted** at (213) 580-2950 regarding the potential impact upon existing school bus routes. The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas. To ensure that effective conditions are employed to reduce construction and operation related transportation impacts on District sites, including the net increase of 1,000 or more daily vehicle trips, we ask that the following language be included in the recommended conditions for traffic impacts:

- School buses must have unrestricted access to schools.
- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.
- During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.

0908

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.
- Parents/guardians dropping off their children must have access to the passenger loading areas.

0909 During construction, detour route(s) will be necessary to divert traffic from the project area and continue to provide access to Mission Road, 1st Street, and east/west corridors for the traveling public. The EIR should evaluate the impact of additional vehicular and truck traffic to District sites that are located along detour routes. Adequate impact analysis should incorporate discussion on school pedestrian safety and potential disruptions to school operations and access to schools.

0910 **Pedestrian Safety**

Construction activities that include street closures, the presence of heavy equipment and increased truck trips to haul materials on and off the project site can lead to safety hazards for people walking in the vicinity of the construction site. To ensure that effective conditions are employed to reduce construction and operation related pedestrian safety impacts on District sites, we ask that the City incorporate into the project's conditions or mitigation measures the following language:

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to school may be impacted.
- Contractors must maintain safe and convenient pedestrian routes to all nearby schools.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes are not to pass by ***any*** school, except when school is ***not*** in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards and flaggers at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be addressed to ensure the welfare of the students attending schools, their teachers and staff, as well as to inform parents and guardians of these students.

Thank you for your attention to this matter. If you need additional information, please contact me at or at zulema.renteria@lausd.net.

Sincerely,

Zulema Renteria
Environmental Planning Specialist

Los Angeles Unified School District (LAUSD)
Office of Environmental Health and Safety (OEHS)
333 S Beaudry Ave., 21st Floor, Los Angeles, CA 90017

22.26 Response to Submission 013842 (Zulema Renteria, Los Angeles Unified School District, Feb 3, 2026)

22.26.1 0900

The commenter lists seven schools, stating that they are within the project footprint. As a point of clarification, the project footprint is the area that is needed to build and operate the project, and it is depicted in Appendix 3.1-B, Los Angeles to Anaheim: Footprint Mapbook, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). There are no schools within the Los Angeles to Anaheim Project Section (project section) footprint. The California High-Speed Rail Authority (Authority) evaluated potential impacts on schools in accordance with the resource study areas (RSA) defined for each environmental topic within the Draft EIR/EIS. For each environmental topic, a detailed geographic information system survey was prepared to identify all schools and educational facilities that would be considered sensitive receptors that would fall within the applicable RSA.

Most of the schools mentioned in this comment fall outside of the largest RSA distance considered in the Draft EIR/EIS (0.25 mile or 1,320 feet), and therefore they would not be affected by the project. These schools fall outside of all RSAs, based on their approximate distances from the project footprint:

- Christopher Dena Elementary: 2,200 feet
- Eastman Avenue Elementary: 3,000 feet
- Extera Public School: 3,800 feet
- Metropolitan High School: 1,800 feet
- Utah Street: 1,700 feet
- 2nd Street Elementary: 3,900 feet

The following school does fall within the RSAs considered in the Draft EIR/EIS and is evaluated based on its approximate distance from the project footprint:

- Felicitas & Gonzalo Mendez High School: 909 feet

There is the potential for road closures and construction traffic to affect school sites outside of the RSAs. The closest road closure and detour that would affect a Los Angeles Unified School District site would be for construction of new railroad bridge over Downey Road. Table 3.2-20 in Section 3.2, Transportation, of the Draft EIR/EIS identifies a detour route that would pass by Christopher Dena Elementary School. Refer to response to comment #0909 below for additional detour and traffic information.

Refer to Section 5.6.3, Project Impacts, of the Draft EIR/EIS for environmental impacts that could affect the surrounding communities.

22.26.2 0901

All schools and sensitive receptors identified within the RSAs were evaluated for impacts, with impact avoidance and minimization features (IAMF) and mitigation measures proposed where necessary to avoid and minimize impacts. Construction and operational impacts on schools are accounted for throughout the Draft EIR/EIS. Refer to the Project Impacts subsections of Section 3.2; Section 3.3, Air Quality and Global Climate Change; Section 3.4, Noise and Vibration; Section 3.10, Hazardous Materials and Wastes; and Section 3.12, Socioeconomics and Communities, for impacts related to transportation (transit, vehicle, pedestrian, and bicyclists), air quality, noise, hazards, and children's safety, respectively. Refer to responses to comments #0902 through #0910 below for more details on how the Draft EIR/EIS analyzed schools as sensitive receptors.

22.26.3 0902

As described in Draft EIR/EIS Section 3.2.6.3, Project Impacts, TR-IAMF#2, Construction Transportation Plan, will be incorporated as part of the project to address temporary impacts on circulation and access. This IAMF requires the contractor to prepare a detailed construction transportation plan for minimizing the impact of construction and construction traffic on adjoining and

nearby roadways while maintaining traffic flow during peak travel periods. This measure further requires advance notification to local school districts of construction activities, to provide rigorously maintained traffic control at all school bus loading zones, and to provide for the safety of schoolchildren.

The Authority acknowledges the specific requests of the commenter for the timing of construction activities and the role of school administrators in Construction Management Plan (CMP) reviews; these will be considered in the development of the construction transportation plan.

22.26.4 0903

The comment requests inclusion of further provisions into conditions of approval, mitigation measures, or both in support of the proposition that students should be considered sensitive receptors to the impacts of air pollution.

Draft EIR/EIS Figure 3.3-5 depicts all schools within 1,000 feet of the project footprint, all of which were included in the air quality impact analysis.

Residential receptors have higher (more conservative) cancer risk estimates than school receptors because residential receptors have longer daily exposures assumed (24 hours versus 8 hours), year-round exposure (full year versus school year), and higher risk factors starting in the third trimester of pregnancy. As a result, the same pollutant concentration yields a higher risk for residential receptors. To estimate worst-case cancer risk, all schools were modeled as residential sensitive receptors.

The Authority will implement all applicable South Coast Air Quality Management District (SCAQMD) rules and regulations to ensure that construction air pollutant impacts are reduced.

Specifically, Draft EIR/EIS Section 3.3.2.3, Regional Air Basin Plans and Policies, describes the rules and regulations of SCAQMD that would be applicable to the project. Rule 402, Nuisance, restricts the discharge of any contaminant in quantities that cause or have a natural ability to cause injury, damage, nuisance, or annoyance to businesses, property, or the public. Additionally, Rule 403, Fugitive Dust, requires the prevention, reduction, or mitigation of fugitive dust emissions from a project site.

Final EIR/EIS Section 16.5.3, Section 3.3: Air Quality and Global Climate Change, in Chapter 16, Corrections and Additions to the Draft Report, reflects the inclusion of three additional applicable SCAQMD rules and regulations:

- Rule 1110.2: Emissions from Gaseous and Liquid Fueled Engines. This rule helps reduce nitrogen oxide, volatile organic compound, and carbon monoxide emissions from all stationary and portable spark- or compression-ignited internal combustion engines over 50 rated brake horsepower.
- Rule 1166: Volatile Organic Compound Emissions from Decontamination of Soil. This rule requires that an approved mitigation plan be obtained from SCAQMD prior to excavating, grading, handling, or storage of soil containing volatile organic compounds.
- Rule 1466: Control of Particulate Emissions from Soils with Toxic Air Contaminants. This rule seeks to minimize the amount of off-site fugitive dust emissions containing toxic air contaminants by reducing particulate emissions in the ambient air.

Under AQ-IAMF#1, Fugitive Dust Emissions, the project would be required to develop a construction dust plan. The Authority and contract administrator would incorporate all applicable SCAQMD Rule 403 requirements into the contract specifications for construction contractors and subcontractors as part of this construction dust plan. This fugitive dust plan would include the requirement to post a visible sign with the telephone number and person to contact regarding dust complaints.

Furthermore, AQ-IAMF#4, Reduce Criteria Exhaust Emissions from Construction Equipment, would require that all heavy-duty off-road construction diesel equipment used during construction will meet Tier 4 Final engine requirements; and AQ-IAMF#5, Reduce Criteria Exhaust Emissions from On-Road Construction Equipment, requires that all on-road trucks will consist of model year 2020 or newer. Construction diesel fuel vehicles would be required to comply with Title 13 of the California

Code of Regulations Section 2485, which restricts diesel engine idling to no more than 5 minutes at any location.

Finally, AQ-MM#2, Requirements for Use of Zero-Emission or Near-Zero-Emission Vehicles and Off-Road Equipment to Reduce Construction Emissions, would reduce the impact of construction emissions from project-related on-road vehicles and off-road equipment. AQ-MM#2 has been updated in coordination with SCAQMD. Refer to Final EIR/EIS Section 16.5.3 in Chapter 16 for these changes.

22.26.5 0904

As discussed under Impact HMW-1 in the Draft EIR/EIS, construction would temporarily increase the regional transport, use, storage, and disposal of hazardous materials commonly used at construction sites. The project includes HMW-IAMF#4, Known, Suspected, and Unanticipated Environmental Contamination; HMW-IAMF#5, Demolition Plans; HMW-IAMF#6, Spill Prevention; HMW-IAMF#7, Storage and Transport of Materials; HMW-IAMF#8, Permit Conditions; HMW-IAMF#9, Environmental Management System; HMW-IAMF#10, Hazardous Materials Plans; and HYD-IAMF#3, Prepare and Implement a Construction Stormwater Pollution Prevention Plan, in the project design to avoid and minimize impacts related to regional transport, use, storage, and disposal of hazardous materials. The handling of hazardous materials, substances, or waste within 0.25 mile of a school, including storage and transport, is discussed under Impact HMW-6. The storage and transport of hazardous materials will be consistent with state and federal regulations (HMW-IAMF#7), and project design measures and permit conditions for transport, labeling, containment, cover, and other best management practices (BMP) for storage and handling of hazardous materials during construction will be implemented (HMW-IAMF#8). Regulatory and permit requirements will apply near school sites to prevent accidental release of hazardous materials during transport, use, storage, or disposal. Prior to construction, the Authority will prepare a soil management plan and provide it to the contractor to facilitate development of a CMP that prescribes BMPs to prevent hazardous materials releases and to minimize the effect of a release were it to occur (HMW-IAMF#6). The CMP will include measures for locating hazardous materials storage and handling areas away from sensitive receptors. In addition, the CMP will include specifications to address the release of contaminants or contaminated media via HMW-IAMF#4, further reducing the potential release of on-site contaminants to the surrounding environment, including the educational facilities listed in Table 3.10-5. Lastly, the Authority will prepare a demolition plan during project design that would address proper handling, transport, and disposal of hazardous waste that could result from project demolition (HMW-IAMF#5). These measures serve to avoid the potential for an inadvertent release of hazardous materials and minimize the effects should a release occur in proximity to schools.

Although the project includes adherence to HMW-IAMF#4, HMW-IAMF#5, HMW-IAMF#6, HMW-IAMF#7, and HMW-IAMF#8, project impacts related to the handling of hazardous materials within 0.25 mile of a school would require implementation of HMW-MM#1, Limit Use of Extremely Hazardous Materials Near Schools During Construction, to mitigate potential impacts on schools within 0.25 mile of the project footprint. Prior to construction, the contractor would prepare a memorandum regarding hazardous materials BMPs related to construction activity for approval by the Authority. The memorandum would confirm that the contractor would not handle or store an extremely hazardous substance (as defined in California Public Resources Code Section 21151.4) or a mixture containing extremely hazardous substances in a quantity equal to or greater than the state threshold quantity specified pursuant to subdivision (j) of Section 25532 of the Health and Safety Code within 0.25 mile of a school. Additionally, the memorandum would acknowledge that prior to construction activities, signage would be installed to delimit all work areas within 0.25 mile of a school, informing the contractor not to bring extremely hazardous substances into the area.

The Authority has revised the discussion for impact HMW-6 to also include implementation of HMW-MM#2, Coordination of High-Speed Rail Design and Construction with Remediation of Exide Site and Orange County North Basin Superfund Site, which requires the Authority to coordinate with the regulatory oversight agencies and the responsible parties on the design of the project alternatives and station options in the areas of the Orange County North Basin Superfund site. HMW-MM#2 also requires the Authority to engage with public interested parties, including the City of Fullerton, at

specific design milestones. As such, potential controls intended for the protection of human health and the environment in proximity to schools and compliance with applicable cleanup requirements associated with this site would be implemented as necessary. No schools are presently within 0.25 mile of the Exide site. Given this, implementation of HMW-MM#2 under Impact HMW-6 would only apply to the Orange County North Basin Superfund site footprint. Please refer to Section 16.5.10, Section 3.10: Hazardous Materials and Wastes, in Chapter 16 of the Final EIR/EIS for these revisions.

As written, adherence to HMW-IAMF#4, HMW-IAMF#5, HMW-IAMF#6, HMW-IAMF#7, HMW-IAMF#8, HMW-MM#1, and HMW-MM#2 would be effective in avoiding or minimizing potential effects on schools throughout the project section. Furthermore, HMW-MM#1 is consistent with California Public Resources Code Section 21151.4. With hazardous materials storage and handling areas located away from sensitive receptors per HMW-IAMF#6, proposed language regarding routing is deemed unnecessary.

22.26.6 0905

The commenter cites Los Angeles Unified School District's noise standards that are based on California Department of Transportation regulations. Under the California Environmental Quality Act (CEQA), a lead agency has discretion to determine the appropriate threshold of significance to evaluate a particular impact. An agency's choice of a significance threshold will be upheld if it is founded on substantial evidence. Accordingly, Section 3.4.4.4, Methods for Impacts Analysis, of the Draft EIR/EIS describes the noise standards for construction and operation of the project, which are based on Federal Railroad Administration (FRA) and Federal Transit Administration standards, which are specifically tailored to rail and transit projects. Although the FRA manual does not incorporate a fixed noise level increase like Los Angeles Unified School District to determine potential noise impacts, the methodology of comparing existing noise levels to project noise levels assesses the noise level increase and accounts for different existing noise environments more appropriately. For example, an increase of 3 A-weighted decibels (dBA) from 52 to 55 dBA is less of an overall impact than 72 to 75 dBA.

Because the project is being undertaken by a state agency (the Authority), the project must conform to the policies and objectives of the statutes and regulations under which the Authority operates. Because an agency of the State of California is the project proponent, the project is not subject to local government general plan policies, zoning regulations, or standards (refer to, e.g., *Town of Atherton v. Superior Court* [1958] 159 Cal.App.2d 417, 428, citing to *Hall v. Taft* [1956] 47 Cal.2d 177,183; *Lawler v. City of Redding* [1992] 7Cal.App.4th 778, 784). Unless the Legislature expressly waives this immunity in a statute, which it has not done here, the general rule is that a local agency cannot regulate state activities (refer to *Del Norte Disposal, Inc. v. Department of Corrections* [1994] 26 Cal.App.4th 1009, 1013). Moreover, although CEQA requires that EIRs discuss inconsistencies with applicable plans, even then, an inconsistency by itself is not considered an environmental impact.

The only Los Angeles Unified School District school within the noise RSA is Felicitas & Gonzalo Mendez High School, which is approximately 900 feet from the project footprint. During construction, temporary noise impacts are expected to occur at noise-sensitive receivers within the distances presented in Table 3.4-13; Felicitas & Gonzalo Mendez High School is outside of the estimated impact distances, and therefore would not experience a construction noise impact. Similarly, no operational noise impacts would occur at this school, as presented in Table 3.4-17 of the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.26.7 0906

After implementation of N&V-MM#1, Construction Noise Mitigation Measures, which requires the contractor to prepare a noise monitoring program for Authority approval and requires that construction noise not exceed the FRA standards, potential construction noise impacts would be less than significant under CEQA. N&V-MM#1 includes provisions that minimize pile driver use, including using alternative equipment such as auger drills and limiting the hours of usage. N&V-MM#1 also includes the provision of a hotline regarding construction activities, and requires the Authority to respond to

concerns and questions received on the hotline within 24 hours. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.26.8 0907

Refer to the response to comment #0906 above. As part of the noise monitoring program required by N&V-MM#1, several methods to reduce noise could be implemented, including building temporary barriers as required to comply with the project noise limits. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.26.9 0908

Refer to the response to comment #0902 above. The Authority acknowledges the specific requests of the commenter for installation/maintenance of appropriate traffic controls, ongoing communication with school administrators, and parent/student access to the passenger loading areas, and will consider them in the development of the construction transportation plan.

22.26.10 0909

The commenter refers to maintaining access to Mission Road, First Street, and east/west corridors. No temporary closures or detours are proposed that would affect these roads. The closest road closure and detour that would affect a Los Angeles Unified School District site would be for construction of new railroad bridge over Downey Road. Table 3.2-20 in Section 3.2 of the Draft EIR/EIS identifies a detour route that would pass by Christopher Dena Elementary School. As described in Section 3.12.6.3, Project Impacts, Impact SO-9, local roadway modifications and construction activities may temporarily disrupt circulation patterns in some communities, potentially including school bus transportation routes and the safety of children bicycling or walking to school. TR-IAMF#2 requires preparation of a construction transportation plan before construction to provide information ensuring the safety of school children and advising the school district of construction activities. The construction transportation plan will require advance notification to the local school district of construction activities and rigorously maintained traffic control at all school bus loading zones, to provide for the safety of school children. In addition, the construction transportation plan will include review of existing or planned Safe Routes to Schools with both school districts and emergency responders. The construction transportation plan will incorporate roadway modifications that maintain existing traffic patterns and fulfill response route and access needs during project construction and project operations. Therefore, traffic impacts on children's health and safety during construction would be minimized to the extent practicable. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.26.11 0910

Refer to the responses to comments #0902, #0908, and #0909 above. In addition to TR-IAMF#2, the Authority will incorporate TR-IAMF#4, Maintenance of Pedestrian Access; and TR-IAMF#5, Maintenance of Bicycle Access, which require the preparation of specific Construction Management Plans as part of the construction transportation plan to address maintenance of pedestrian and bicycle access and safety. The Authority acknowledges the specific requests of the commenter and will consider them in the development of the construction transportation plan.

Los Angeles to Anaheim - RECORD #013848 DETAIL

Status:	Ready for Delimiting
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Nicholas Zamarripa

Stakeholder Comments/Issues:

0599

Hello, When reviewing the Draft EIR/EIS for the LA to Anaheim Segment of the California High Speed Rail, the Design Flow Rate for Fullerton Creek in Table 3.8-4 is listed as 3,550 cfs. That flow is applicable at the intersection of Fullerton Creek and the tracks running in the east/west direction. Where Fullerton Creek crosses the north/south tracks the design flow rate, according to the County's hydrology report, is 4,400 cfs and should be revised in the EIR. The Kimberly Storm Channel, which is a city facility, contributes flow to

0600

Fullerton Creek immediately upstream of the north/south tracks crossing over Fullerton Creek. Additionally, any future improvement within OCFCD right-of-way would be subject to review, approval, and permitting by the County. A Concept Study including preliminary improvement plans should be submitted to OC Public Works/Infrastructure Programs through County Property Permit (CPP) process. An encroachment permit from the County's Public Property Permits Section is needed for any work within, over, and under OCFCD's right-of-way. Please visit our website – https://myoceservices.ocgov.com/ for information regarding permit application. Any work within the OCFCD right of way shall be performed in a manner that would not obstruct existing maintenance roads, access to public streets or access to the channel bottom, nor interfere with or disrupt OCFCD's ability to perform operation and maintenance activities. Thank you, Nick Zamarripa, P.E. Civil Engineer OC Public Works |Development Support Floodplain Management & Hydrology 601 N. Ross Street, Santa Ana, 92701 Office: (714) 647-3985 Work Cell: (949) 344-3526 Nicholas.Zamarripa@ocpw.ocgov.com

22.27 Response to Submission 013848 (Nicholas Zamarripa, County of Orange Public Works, Feb 3, 2026)

22.27.1 0599

Table 3.8-4 has been revised in Section 16.5.8, Section 3.8: Hydrology and Water Resources, in Chapter 16, Corrections and Additions to the Draft Report, of the Final Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) to correct the design flow rate of the two Fullerton Creek Crossings. As depicted on Figure 3.8-12, there are two Fullerton Creek crossings. The design flow rate at the Fullerton Creek Crossing – Atchison, Topeka and Santa Fe railroad is 3,550 cubic feet per second; the design flow rate at Fullerton Creek Crossing – Kimberly Storm Channel is 4,400 cubic feet per second.

22.27.2 0600

The commenter states that any work within the Orange County Flood Control District right-of-way would be subject to review, approval, and permitting by the County of Orange, and indicates that work should not obstruct Orange County Flood Control District infrastructure or maintenance activities. As documented in Section 2.11, Permits and Approvals, of the Draft EIR/EIS, as a state agency, the California High-Speed Rail Authority (Authority) is exempt from regional and local permit requirements. However, the Authority has endeavored to design and build the California High-Speed Rail System so that it is consistent with land use regulations. The Authority has coordinated with local government entities and utility owners throughout the alternatives analysis and development of the Draft EIR/EIS phases of the project. The Authority will continue this coordination through the final design and engineering phases. To coordinate construction activities with local jurisdictions, the Authority plans to pursue local permits as part of construction processes consistent with local ordinances. The Authority's contractor will notify the Los Angeles County Flood Control District and Orange County Flood Control District in advance of any project construction activities to minimize the potential for disruptions to these agencies' operation and maintenance activities. Refer to Chapter 16 of the Final EIR/EIS for revisions to Section 1.1.5, Lead Agencies, Cooperating Agencies, and Responsible Agencies (refer to Section 16.3, Chapter 1: Project Purpose, Need, and Objectives); and Table 2-24, Anticipated Environmental Reviews, Permits/Approvals, and Coordination by Agency (refer to Section 16.4, Chapter 2: Alternatives).

Los Angeles to Anaheim - RECORD #013850 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Deepthi Arabolu

Stakeholder Comments/Issues:

0602

Please note that, above all, parking has been our primary concern from the beginning of our review. The summary below reflects my comments, which I will be submitting on behalf of the City. • Current Dale Street Metrolink Station: • The existing Metrolink Station on Dale Street provides a total of 314 parking stalls, consisting of 303 regular stalls and 11 ADA/handicapped stalls. • Despite this supply, we regularly observe vehicles spilling onto surrounding streets due to inadequate parking availability. • Proposed Beach Boulevard & Stage Road Metrolink Station: • In comparison, the proposed Metrolink Station at Beach Boulevard and Stage Road would include a total of 313 parking stalls, consisting of 302 regular stalls and 11 ADA/handicapped stalls. • Based on current usage patterns at the Dale Street location, this number of parking spaces would not be adequate. Additionally, unlike the Dale Street area, Stage Road and Beach Boulevard do not provide on-street parking, further limiting overflow options. As a result, parking constraints remain a significant concern with the proposed relocation.

22.28 Response to Submission 013850 (Deepthi Arabolu, Buena Park Public Works, Feb 3, 2026)

22.28.1 0602

The California High-Speed Rail Authority (Authority) acknowledges the commenter's concerns regarding parking spillover at the relocated Buena Park Metrolink Station. The Authority's policy is to rebuild existing infrastructure in kind. Therefore, the relocated Buena Park Metrolink Station would include the same number of parking spaces that are at the existing station. However, as depicted on Figure 2-67 in the Draft Environmental Impact Report/Environmental Impact Statement, the Authority has left space within the station footprint that would be available for the city to use to develop additional parking, should the city wish to pursue a separate project to do so.

Los Angeles to Anaheim - RECORD #013855 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	David Berryman

Stakeholder Comments/Issues:

2515

Good afternoon, The LOSSAN Agency is pleased to provide comments on the LA-A Draft EIR/EIS in the attached Comment Review Log. In this spreadsheet, the green tab labeled "Comments-Feb-2026" contains our current comments (12 total). The other tab (gray color) contains comments LOSSAN made during the last review period about a year ago. Any comments from that round that appeared not to be addressed for this current round were copied over into the new, green tab. LOSSAN appreciates this opportunity to provide comments, and we look forward to working with HSR as this project advances. Please feel free to reach out to me if you have any questions. Thank you, David Berryman, PE LOSSAN Capital Program Manager d: (714) 560-5681 c: e: dberryman@octa.net LOSSAN Rail Corridor Agency 600 South Main Street Orange, CA 92863 The information in this e-mail and any attachments are for the sole use of the intended recipient and may contain privileged and confidential information. If you are not the intended recipient, any use, disclosure, copying or distribution of this message or attachment is strictly prohibited. If you believe that you have received this e-mail in error, please contact the sender immediately and delete the e-mail and all of its attachments.

CALIFORNIA HIGH-SPEED RAIL PROJECT

Los Angeles to Anaheim Project Section

RESPONSIBLE AGENCY COMMENT & RESPONSE LOG

Project: HSR - Los Angeles to Anaheim (LA-A) | Updated: 2/3/2026

Agency: LOSSAN Rail Corridor Agency | Submittal: Administrative Draft EIR/EIS for Responsible Agency Review

	Comments				Responses (Disposition Code: A = Have Incorporated / Will Incorporate; B = Have Clarified / Will Clarify; C = Delete Comment; D = Will Incorporate in Next Submittal; E = Discuss / Clarify with Authority)				
	Comment Number	Page/Sect Number	Comments	Reviewers Name	Date	Disposition	Response	Respond Initials	Date	Verification (QC name/date)
2516	1	3.2-71	States that Amtrak and Metrolink serve the Norwalk/Santa Fe Station. Please update to reflect that Amtrak does not currently service this station.	Jason Jewell	2/3/2026					
2517	2	3.2-92	(Fullerton) States that the southernmost platform at the Fullerton station to be closed and existing tracks will remain operational. Also states that Metrolink would continue to serve the remaining eastern portion of platform. Please clarify which portion of the platform would Amtrak Pacific Surfliner serve.	Jason Jewell	2/3/2026					
2518	3	3.2-92	(Fullerton) States that when construction of the new center platform and track is complete, a short-term closure would be required to connect the new tracks. Once details on the length of closures have been established, it will be important for HSR to coordinate with rail operators on work window schedules to mitigate the impacts to ridership, revenue and costs to passenger rail service from the closures.	Jason Jewell	2/3/2026					
2519	4	General	(Fullerton) With the proposed pedestrian undercrossing at Fullerton station, will the passageway be large enough to allow Amtrak Pacific Surfliner baggage vehicles to freely access the crossings, particularly at the sharp turns?	Jason Jewell	2/3/2026					

2520	5	3.2-120	Mentions the amount and speed of both HSR and Metrolink operations and the need to maintain established service as scheduled. There is no mention, however, of Amtrak Pacific Surfliner service. Was Amtrak Pacific Surfliner taken into account as it relates to capacity during operations?	Jason Jewell	2/3/2026					
2521	6	General	Are there key assumptions, analysis or detail that HSR can share regarding its proposed service to ensure future operational capacity will exist for all services? Is Coachella Valley Rail contemplated and assessed in relation to future operational capacity? This would be helpful to understand full operational impacts and how this relates to the number of train slots available.	Jason Jewell	2/3/2026					
2522	7	3.2-131	States Authority will coordinate with freight and passenger rail agencies and operators and mentions BNSF and Metrolink. Recommend adding Amtrak Pacific Surfliner and/or the LOSSAN Rail Corridor Agency.	Jason Jewell	2/3/2026					
2523	8	2-94	Does the ARTIC configuration take into account the new OC VIBE development that is under construction in the parking assumptions?	David Berryman	2/3/2026					
2524	9	2-111	The new Fullerton station center platform is more to the west than the existing platform by about 600 feet. We would have to look at this one more closely on a detailed plan to see and understand the impacts. As close to the original platform location is preferred.	David Berryman	2/3/2026					
2525	10	2-111	The Pacific Surfliner during the summer season can operate trains up to 1,000 feet in length to accommodate the high demand of passengers traveling to events such as the Del Mar Horse Races and Comic-Con. The platform length of 800 feet does not accommodate these seasonal trains, which will then require double spotting resulting in an impact to the overall dwell time and slots on the corridor.	David Berryman	2/3/2026					

2526	11	General	Clearances - provide a diagram showing that the proposed HSR infrastructure including catenary system, platforms, etc. meet all required clearances for passenger rail equipment. There was a reference to an Amtrak standard in the Standards section, but it was general and did not specify a particular document.	David Berryman	2/3/2026					
2527	12	2-138	15th Street LMF - this option (Alternative B) would create significant access challenges to the existing Amtrak 8th Street yard. LOSSAN would like to partner with HSR in the design development to address these challenges. Additionally, a study of long term impacts would need to be done for LOSSAN review, eg. would the new HSR LMF constrict future expansion of Amtrak's existing facility.	David Berryman	2/3/2026					

2528

RESPONSIBLE AGENCY COMMENT & RESPONSE LOG

Project: HSR - Los Angeles to Anaheim (LA-A)		Updated	2/7/2025
Agency: LOSSAN Rail Corridor Agency	Submittal: Administrative Draft EIR/EIS for Responsible Agency Review		

Comments					Responses Disposition Code: A = Have Incorporated / Will Incorporate; B = Have Clarified / Will Clarify; C = Delete Comment; D = Will Incorporate in Next Submittal; E = Discuss / Clarify with Authority				
Comment Number	Page/Sect Number	Comments	Reviewers Name	Date	Disposition	Response	Respond Initials	Date	Verification (QC name/date)
1	2-52	Reference of the Strategic Implementation Plan is out of date. LOSSAN adopted an updated Strategic Plan in July 2023. This new Plan and the associated service goals should be the one referenced.	James Campbell	3/7/2025	A	Updated	David B	2/3/2026	
2	2-53	Metrolink also has a more updated Strategic Plan that was adopted in 2021 and should be used as a more current reference.	James Campbell	3/7/2025	A	Updated	David B	2/3/2026	
3	2-87	Will there be any modifications to the Fullerton station concepts under consideration for the Fullerton Interlocker Project?	James Campbell	3/7/2025	A	In Section 2.6.5.3 (page 2-143), it looks like the projects are being coordinated.	David B	2/3/2026	

4	2-99	Does the ARTIC configuration take into account the new OC VIBE development that is under construction in the parking assumptions?	James Campbell	3/7/2025	D	No mention of OC Vibe in the revised Chapter 2.	David B	2/3/2026	
5	2-105	Does the new pedestrian underpass at Fullerton accommodate electric carts for baggage and ADA access? The Pacific Surfliner has historically provided baggage service to our passengers. While this service has been suspended the last few years for budgetary reasons, we do anticipate restoring this service. Further, the Pacific Surfliner does have scheduled transfers with the Southwest Chief operating to and from Chicago. The ability to maintain baggage service in a safe and efficient manner is critical to our service. Without this ability, the Pacific Surfliner will not be able to utilize the new platform on the south side and the overall operational gains anticipated from this project will not be achieved.	James Campbell	3/7/2025	D	No mention of baggage nor the Southwest Chief in the Fullerton Station section.	David B	2/3/2026	
6	2-105	The Pacific Surfliner during the summer season can operate trains up to 1,000 feet in length to accommodate the high demand of passengers traveling to events such as the Del Mar Horse Races and Comic-Con. The platform length of 800 feet presented in the Administrative Draft Section 2 Alternatives, does not accommodate these seasonal trains, which will then require double spotting resulting in an impact to the overall dwell time and slots on the corridor.	James Campbell	3/7/2025	D	No mention of a 1,000-foot platform. The revised Chapter 2 still references a 800-foot platform with no further discussion.	David B	2/3/2026	
7	2-126	Should state that "no HSR or Pacific Surfliner trains would stop at this station."	James Campbell	3/7/2025	C	Not updated (page 2-113)	David B	2/3/2026	

8	2-128	Should state that "no HSR or Pacific Surfliner trains would stop at this station."	James Campbell	3/7/2025	C	Not updated (page 2-115)	David B	2/3/2026	
9	2-152	Is this still an option under consideration? If it is, LOSSAN will need to determine the feasibility of growing Pacific Surfliner service if the ability to expand the existing facility is no longer possible due to the the HSR LMF.	James Campbell	3/10/2025	D	This is for Alternative B, which proposes the LMF adjacent and west of the existing Amtrak 8th street yard. We would need to do a full review of this option. This would create significant access challenges to the yard from the west.	David B	2/3/2026	
10	2-152	Are there any impacts to Amtrak's maintenance facility in Los Angeles that could affect maintenance activities for the Pacific Surfliner?	James Campbell	3/10/2025	D	Not fully addressed. As in the comment above, we would need to a full review. If Alternative B is selected, LOSSAN would like to partner with HSR in the design development of the 15th Street LMF.	David B	2/3/2026	

22.29 Response to Submission 013855 (David Berryman, LOSSAN Rail Corridor Agency, Feb 3, 2026)

22.29.1 2515

The comment introduces the Los Angeles – San Diego – San Luis Obispo (LOSSAN) Rail Corridor Agency's concerns on the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS), which are provided in the commenter's subsequent comments. The LOSSAN Rail Corridor Agency's comments were provided in a spreadsheet. Current comments in the "green tab" are delimited and addressed as comments #2516 through #2527 below. Older comments provided on the Administrative Draft EIR/EIS in the "gray tab" are delimited and addressed as comment #2528 below.

22.29.2 2516

The discussion under the Conventional Passenger Rail heading in Section 3.2.6.2, No Project Alternative, of the Draft EIR/EIS has been revised in the Final EIR/EIS to reflect that Amtrak does not currently provide service to the Norwalk/Santa Fe Springs Metrolink Station. Refer to Section 16.5.2, Section 3.2: Transportation, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS for this revision.

22.29.3 2517

The Draft EIR/EIS states under Impact TR-8 in Section 3.2, Transportation, that the proposed modifications to the Fullerton Metrolink/Amtrak Station would require a portion of the southernmost platform to be closed during construction. Metrolink and Pacific Surfliner trains would temporarily serve the remaining eastern portion of the platform during project construction.

22.29.4 2518

To prevent construction from adversely affecting existing and planned rail service within the corridor or transit service at passenger rail stations, the California High-Speed Rail Authority (Authority) will incorporate TR-IAMF#13, Stakeholder Coordination with Transportation Agencies. Through incorporation of TR-IAMF#13, the Authority will work closely with all agencies that provide freight, passenger rail, and bus services or maintain operating rights within the corridor to ensure that the design, construction, and operation of the Los Angeles to Anaheim Project Section (project section) do not adversely affect existing and planned rail service. Because specific work windows for track construction activities have not yet been defined, the Authority acknowledges that the avoidance or minimization of potential disruptions to freight and passenger rail weekday services cannot be ensured at this time. The Authority will implement TRAN-MM#6, Prepare Track Construction Work Window Plan. This will reduce disruptions to freight and passenger rail service by requiring the Authority to coordinate with freight and passenger rail agencies and operators to identify specific work windows for track construction activities that minimize disruption to freight and passenger rail services within the project corridor to the maximum extent feasible.

22.29.5 2519

As discussed in Section 2.6.3.5, Freight or Passenger Railroad Modifications, of Chapter 2, Alternatives, of the Draft EIR/EIS, the existing pedestrian overpass east of Harbor Boulevard that connects the two side platforms would be removed and replaced by a new pedestrian underpass that connects the existing northern platform to the new center platform and Walnut Avenue to the south, with ramps and stairs providing access. Based on existing right-of-way constraints, the new pedestrian undercrossing would not be able to accommodate a baggage vehicle. Baggage vehicles currently cross the tracks via the at-grade station crossings to the east and west of the existing pedestrian overpass. Although it is assumed baggage vehicles would continue to cross the tracks as they currently do, the Authority will coordinate with the City of Fullerton and other parties to explore other potential options during the future design phases.

22.29.6 2520

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18, Standard Responses.

22.29.7 2521

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.29.8 2522

TRAN-MM#6 in Section 3.2.7, Mitigation Measures, of the Draft EIR/EIS has been revised in the Final EIR/EIS to specifically include the LOSSAN Rail Corridor Agency and Amtrak, as well as the Riverside County Transportation Commission. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.29.9 2523

The Draft EIR/EIS accounts for OCVIBE's status as a planned project. Appendix 3.19-A, Cumulative Plans and Nontransportation Projects List, of the Draft EIR/EIS provides an extensive list of the residential and commercial growth expected in Los Angeles and Orange Counties, including the OCVIBE Project (Map ID 54). OCVIBE and its components are further discussed in Section 3.13, Station Planning, Land Use, and Development, of the Draft EIR/EIS, specifically in Section 3.13.5.2, Zoning and Planned Uses, and Section 3.13.6.2, No Project Alternative. The Authority will continue to coordinate with the City of Anaheim to manage the overall implementation of both the high-speed rail (HSR) project section and OCVIBE as both projects advance.

22.29.10 2524

The Authority acknowledges the LOSSAN Rail Corridor Agency's preference. The Authority coordinated with the Southern California Regional Rail Authority and BNSF Railway on the design of the Fullerton Interlocker Project, which the Authority's proposed modifications to the Fullerton Metrolink/Amtrak Station support. Additionally, as depicted on Figure 2-65 of Chapter 2 of the Draft EIR/EIS, a new crossover would be installed immediately east of the new center platform. The crossover would be required as part of the proposed modifications to the station to allow Metrolink passenger trains to switch to the eastbound tracks to then proceed southbound at Fullerton Junction. The crossover only fits in the location depicted on Figure 2-65 of the Draft EIR/EIS, which necessitates that the new center platform be installed in its proposed location. The Authority will coordinate with all operators to further optimize the design of the station modifications as the project section HSR project design progresses.

22.29.11 2525

Although the name of the station is not listed in the comment, it appears to be referencing the Fullerton Metrolink/Amtrak Station, which is presented in Volume 3.5, sheet AR-B0701A of the Draft EIR/EIS as 800 feet long. The commenter states that the proposed 800-foot platform does not meet the needs of Amtrak's seasonal trains, which are 1,000 feet long. The Authority is required to follow Metrolink standards at Metrolink stations. Although the current platform lengths at this station are 850 feet, the 800-foot platform length was provided by Metrolink as part of the Fullerton Interlocker design and incorporated into the HSR project design. Further discussions would be needed with Metrolink to increase the platform length.

The Authority acknowledges that Amtrak occasionally operates longer trains during the summer to accommodate events, which requires double-spotting at the Fullerton Metrolink/Amtrak Station. In 2026, it offered additional seating capacity on select trains during the first weekend of the Del Mar Racing Season and San Diego Comic-Con (Amtrak 2026). The Authority's proposed platform configuration would require Amtrak to continue to operate as it currently does, with double-spotting for select trains during very limited times each year. Given the infrequency of this service, the 800-foot platform would not affect Amtrak's overall ability to operate its services.

22.29.12 2526

Refer to drawing TT-B3001 of Volume 3.1 of the Los Angeles to Anaheim Project Section Preliminary Engineering for Project Definition, which provides typical functional cross sections and clearances above the tracks.

The commenter refers to Amtrak standards, but it is unclear to which document they are referring. The Draft EIR/EIS does not refer to Amtrak design standards, and the design is not based on its standards. The design in this shared corridor is based on the minimum standards of the host railroad (such as BNSF Railway and Metrolink), as well as minimums established by the California Public Utilities Commission. This is consistent with the Authority's Technical Memorandum 0.3.1, Basis of Design for Blended Operation in the Los Angeles to Anaheim Corridor, which is included in Volume 3.1, drawing GE-B0101.

22.29.13 2527

Chapter 8, Preferred Alternative (Section 8.4.2, Identification of the Preferred Alternative), of the Draft EIR/EIS acknowledges that the 15th Street light maintenance facility (LMF) would be situated in a highly constrained area of the West Bank between the existing Arts District neighborhood and Amtrak's Eighth Street Maintenance yard track and facilities. Accommodation of the HSR lead tracks into the 15th Street LMF yard would require a reconfiguration of the existing Amtrak lead track and relocation of the access gate to its Eighth Street Yard. The highly constrained nature of the 15th Street LMF site is one of the reasons the Authority has selected the 26th Street LMF as the preferred alternative (Shared Passenger Track Alternative A). Design advancement of the 15th Street LMF would not occur under the currently selected Preferred Alternative. As such, additional coordination with LOSSAN Rail Corridor Agency regarding the design of the 15th Street LMF is not warranted at this time.

22.29.14 2528

Refer to response to comment #2515 above for how this set of comments in the spreadsheet was delimited. The comments contained in this sheet were previously submitted to the Authority during review of the Administrative Draft EIR/EIS. The Authority made revisions, as needed, in response to these comments, which were included in the Draft EIR/EIS that was circulated for public review. As indicated by the commenter (comment #2515), any comments from the review of the Administrative Draft EIR/EIS that appeared not to be addressed in the published Draft EIR/EIS were resubmitted as current comments. Current comments are delimited and addressed as comments #2516 through #2527 above. Given the above, the Authority did not provide individual responses for the resolved Administrative Draft EIR/EIS comments that were resubmitted in this comment letter from the agency for informational purposes. For more information on the topics raised by the previous Administrative Draft EIR/EIS comments, refer to the applicable chapter or environmental section of the Draft EIR/EIS.

Los Angeles to Anaheim - RECORD #013859 DETAIL

Status:	Action Pending
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	David Kennedy

Stakeholder Comments/Issues:

Hi, The City of Anaheim has completed our review of the California HSR Los Angeles to Anaheim Section Draft EIR/EIS and prepared the attached letter. Also attached is the comment matrix (Excel file) and two additional attachments associated with recently completed construction projects that could adjust the mitigation measures identified at two locations. Please feel free to let us know if you have any issues downloading the files or if you have any questions. We look forward to hearing back from High-Speed Rail. Thanks David Kennedy, P.E. Associate Transportation Planner City of Anaheim Public Works Department | Traffic and Transportation 200 South Anaheim Boulevard | Suite 276 Anaheim, CA 92805 (714) 765-4920 dkennedy@anaheim.net

City of Anaheim
DEPARTMENT OF PUBLIC WORKS

February 3, 2026

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

Subject: California High-Speed Rail (CHSR) – Los Angeles to Anaheim Project Section, Draft EIR/EIS Comments

Dear Ms. DiCamillo:

2422

We appreciate the opportunity to review the California High-Speed Rail Los Angeles to Anaheim Draft EIR/EIS for the segments within the City of Anaheim. We have compiled City of Anaheim comments, which are included as attachments (in the email to which this letter is attached).

Regarding the remaining at-grade crossings in the City of Anaheim, there are three major at-grade rail crossings identified in the City of Anaheim General Plan for future grade separation. The California HSR project is not designed for, nor does it accommodate the future grade separations at Ball Road, Orangethorpe Avenue, and La Palma Avenue. The referenced documents make a qualitative and subjective assessment without justifying the removal of these future grade separations from the proposed project. These major street grade separations need to be incorporated into the proposed project.

2423

Since the 2024 PEPD review, ocV!BE and California HSR staff have been coordinating the inclusion of the HSR plans to the ocV!BE district. There are additional items that need further coordination with City staff, ARTIC staff, Angels staff, and ocV!BE staff to address key areas given recent updates to ocV!BE, including:

- Proposed drop-off/ pick-up area west of the freeway at ARTIC Lot C adjacent to Angels Stadium
- Programming Douglass Road improvements due to track extension over the street.
- Distribution of parking between the ocV!BE Parking Deck A and ARTIC Lot C.

200 S. Anaheim Blvd., Suite 276
Anaheim, CA 92805

TEL (714) 765-5176
FAX (714) 765-5225

www.anaheim.net

Thank you for consideration of our comments. Should you have any questions, and to coordinate the requested meeting, please contact Rafael Cobian, City Traffic Engineer, at (714) 765-4991 or rcobian@anaheim.net.

Sincerely,

Rudy Emami, P.E.
Director of Public Works

c: Carlos Castellanos, City Engineer
Rafael Cobian, City Traffic Engineer
Joseph Alcock, Principal Transportation Planner

NOTES: The columns in ***YELLOW*** are required fields and must contain a value.
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Project Section/Contract

Submittal: Project Section Environemntal Documents (Tier 2)- Los Angeles to Anaheim Segment

Date: 02/03/2026 City of Anaheim

Action Codes:

A Agree. Designer Agrees and will comply/take action

D Disagree. Designer Disagrees for Reasons Noted.

N Noted. Answer provided in response; no action nee

									RC / Designer's Responses				
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2424	1	2=Recommended	GEN=General	RPT - Report/Memo	3.13	3.13-46	S Douglas Road should be revised to S Douglass Road	1/21/2026	nitaylor@anaheim.net					
2425	2	2=Recommended	GEN=General	RPT - Report/Memo	3.17	3.17-15	The City of Anaheim no longer maintains a list related to the Historic Move-On Program since the Anaheim Redevelopment Agency no longer exists.	1/21/2026	nitaylor@anaheim.net					
2426	3	2=Recommended	GEN=General	RPT - Report/Memo	3.16	3.16-19	The Platinum Triangle Master Land Use Plan was last amended on April 22, 2025.	1/21/2026	nitaylor@anaheim.net					
2427	4	3=Information (no response required)	GEN=General	RPT - Report/Memo	3.16	3.16-47	Angel Stadium Fireworks occur after Saturday night home games rather than Friday night.	1/21/2026	nitaylor@anaheim.net					
2428	5				LAA_EIR-EIS_00_Summary-508	Page S-15	The proposed ARTIC improvements do not adequately consider the existing ARTIC facility, which was originally designed to accommodate many of these facilities and services.	1/23/2026	Lisandro Orozco lorozco@anaheim.net					
2429	6				LAA_EIR-EIS_00_Summary-508	Page S-16	These assumptions and proposals do not reflect the improvements currently under construction at ARTIC and the surrounding properties.	1/23/2026	Lisandro Orozco lorozco@anaheim.net					
2430	7				LAA_EIR-EIS_02_Alternatives-508	Page 2-94	The assumptions and proposals do not reflect the improvements currently under construction at ARTIC and surrounding properties. Notably, the industrial property west of ARTIC is being developed with a new parking structure intended to serve both ARTIC and OCVIBE.	1/23/2026	Lisandro Orozco lorozco@anaheim.net					
2431	8				LAA_EIR-EIS_02_Alternatives-508	Page 2-95	No discussions have occurred with City of Anaheim Planning Division staff regarding the proposed access road, pick-up and drop-off area, entry plaza, or radio tower on the stadium property.	1/23/2026	Lisandro Orozco lorozco@anaheim.net					
2432	9				LAA_EIR-EIS_02_Alternatives-508	Page 2-123	The design of the Katella Avenue undercrossing identified in the PEPD does not comply with the Platinum Triangle Master Land Use Plan. Accordingly, the Authority must process an amendment to the Platinum Triangle Master Land Use Plan Public Realm Landscape and Identity Program to revise Figure 23 and any other relevant planning documents.	1/26/2026	Lisandro Orozco lorozco@anaheim.net					
2433	10				LAA_EIR-EIS_02_Alternatives-508	Page 2-123	The design of the State College Boulevard undercrossing identified in the PEPD does not comply with the Platinum Triangle Master Land Use Plan. Accordingly, the Authority must process an amendment to the Platinum Triangle Master Land Use Plan Public Realm Landscape and Identity Program to revise Figure 27 and any other relevant planning documents.	1/26/2026	Lisandro Orozco lorozco@anaheim.net					
2434	11				LAA_EIR-EIS_02_Alternatives-508	Page 2-123	No discussions have occurred with City of Anaheim Planning Division staff regarding the proposed modifications to Douglass Road or the associated impacts to adjacent City property.	1/26/2026	Lisandro Orozco lorozco@anaheim.net					
2435	12				LAA_EIR-EIS_03.02_Transportation-508	Page 3.2-57	The parking information provided for the ARTIC facility does not reflect current improvements.	1/26/2026	Lisandro Orozco lorozco@anaheim.net					
2436	13				LAA_EIR-EIS_03.02_Transportation-508	Page 3.2-92	The assumption for a parking structure adjacent to SR 57 and Katella Avenue does not reflect the current improvements under construction.	1/26/2026	Lisandro Orozco lorozco@anaheim.net					
2437	14				LAA_EIR-EIS_03.16_Aesthetics-508	Page 3.16-47	The description for the Honda Center under #51 does not reflect the current improvements completed and under construction.	1/28/2026	Lisandro Orozco lorozco@anaheim.net					

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Project Section/Contract

Submittal: Project Section Environemntal Documents (Tier 2)- Los Angeles to Anaheim Segment

Date: 02/03/2026 City of Anaheim

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D Disagree. Designer Disagrees for Reasons Noted.

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2438	15				LAA_EIR-EIS_03.16_Aesthetics-508	Page 3.16-19	The date of the plan and the first sentence in the "Summary" for the Platinum Triangle Master Land Use Plan does not reflect the latest updates.	1/28/2026	Lisandro Orozco lorozco@anaheim.net					
2439	16				LAA_EIR-EIS_08_PreferredAlternative-508	Page 8-30	The assumptions and proposals do not reflect the improvements currently under construction at ARTIC and surrounding properties. Notably, the industrial property west of ARTIC is being developed with a new parking structure intended to serve both ARTIC and OCVIBE.	1/28/2026	Lisandro Orozco lorozco@anaheim.net					
2440	17				LAA_PEPD-Vol3.5_Record_Set_A11Y_508	AR-B0901	City staff have concerns regarding the design of the proposed access road, pick-up and drop-off area, entry plaza, and communication tower. Additional discussions with City of Anaheim staff are requested.	1/29/2026	Lisandro Orozco lorozco@anaheim.net					
2441	18				LAA_PEPD-Vol3.5_Record_Set_A11Y_508	AR-B0901	The assumptions and proposals do not reflect the improvements currently under construction at ARTIC and surrounding properties. Notably, the industrial property west of ARTIC is being developed with a new parking structure intended to serve both ARTIC and OCVIBE.	1/29/2026	Lisandro Orozco lorozco@anaheim.net					
2442	19				LAA-PEPD-Vol3.4_Record_Set_4-a11y_508	CO-F1131	The proposed location for a communication tower at APN# 035-210-09 is adjacent to sensitive land uses directly to the south and west. In addition, while this property is currently developed with an Industrial use, this property is designated for residential use in the City's General Plan and is expected to be redeveloped in the future. Placing a communication tower on this property will impact the redevelopment of this property into housing. Alternative locations for a communication tower exist north of La Palma, approximately 0.44 miles away, along expanded railroad right-of-way and within an existing industrial area with no impact to sensitive land uses and future housing sites. Additional discussions with City of Anaheim staff necessary.	1/29/2026	Lisandro Orozco lorozco@anaheim.net					
2443	20	1=Mandatory	ENV=Environmental	RPT - Report/Memo	LAA_EIR-EIS_03.02_Transportation-508	122(TRAN-MM#1 Modify Traffi Signal control)	Lincoln Ave. Widening-East to Evergreen CIP construction phase has completed PW improvements as of 12/2025 including new TS poles at N/W, N/E and S/E corners of East St and Lincoln Ave, restriping and raised median. This intersection was also improved with new and horizontally realigned sidewalk ramps at S/E and N/E corners. See attached conformed set of plans (RCP 2017-12892) and update accordingly.	1/26/2026	jcortez@anaheim.net					
2444	21	2=Recommended	ENV=Environmental	RPT - Report/Memo	LAA_EIR-EIS_03.02_Transportation-508	131	Orangewood Ave. Widening-State College to City limits at SA River(RCP2017-17013) construction was completed early 2025. Review improvements as they seem to have an impact on proposed MM.	1/26/2026	jcortez@anaheim.net					
2445	22	1=Mandatory	ENV=Environmental	RPT - Report/Memo	LAA_EIR-EIS_03.08_Hydro-508	50-54(3.8.6.3 Project Impacts)	Clarify- Given the impact to receiving bodies of water, which are already impacted by pollutants, do the IAMFs include water run-on/run-off treatment post-construction? Comply with MS4 permit for imp. in COA(permittee)	1/26/2026	jcortez@anaheim.net					
2446	23	1=Mandatory	GEN=General	Drawings	LAA-PEPD-Vol3.4_Record_Set_3_a11y_508	UT-D1621	It is not clear what the proposed realignment of existing utilities is for the State College Blvd grade separation, including OCSD's 54" dia. sewer pipe in 72" dia. steel casing, and their potential impact to existing residential units on west side of State College.	1/28/2026	jcortez@anaheim.net					
2447	24	3=Information (no response required)	GEN=General	RPT - Report/Memo	Vol 1 EIR EIS Summary	S-14	"Eight at-grade crossings would remain at grade in Anaheim (Orangethorpe Ave, La Palma Ave, Sycamore St, Broadway, Santa Ana St, Sixth St, Vermont Ave, and Ball Rd)." Sixth St should be South St	1/27/2026	dmori@anaheim.net					

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Project Section/Contract

Submittal: Project Section Environemntal Documents (Tier 2)- Los Angeles to Anaheim Segment

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2448	25	3=Information (no response required)	GEN=General	RPT - Report/Memo	Vol 1 EIR EIS Summary	S-96	Table S-10 Annual Operational and Maintenance Costs, Apportioned to the Los Angeles to Anaheim Project Section (2015 $millions) Should update the estimates to a time more current or at least 2023 like Table S-9	1/27/2026	dmori@anaheim.net					
2449	26	2=Recommended	PLS=Planning and Sustainability	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	3.2-20	City of Anaheim General Plan (2025) The plan also seeks to: Add: Provide grade separations for the railroad at Orangethorpe Ave, La Palma Ave, Ball Rd, Cerritos Ave, and State College Blvd. Add: Provide grade separations for the railroad at Orangethorpe Ave, La Palma Ave, Ball Rd, Cerritos Ave, and State College Blvd.	1/27/2026	dmori@anaheim.net					
2450	27	2=Recommended	PLS=Planning and Sustainability	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	3.2-68	**Table 3.2-18 Future Conditions Project List:** ORA02925 Grade separation OCTA Anaheim N Tustin Ave Overpass Add bridge for rail N/A1 ORA02925 Grade separation OCTA Anaheim Lakeview Ave New bridge for BNSF Metrolink Rail N/A1 ORA151509 Pedestrian improvement City Anaheim West St and Citron St Construction of sidewalk gap closures N/A1 These 3 projects have already been completed.	1/27/2026	dmori@anaheim.net					
2451	28	2=Recommended	PLS=Planning and Sustainability	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	3.2-77	**Lewis St:** Detoured vehicles for northbound Lewis St would likely turn left at Cerritos Ave, turn right at Haster St, and turn right at Ball Rd to reach their final destination. Southbound Lewis St would follow a similar detour path. Should be: turn right at Anaheim Blvd, not Haster St	1/27/2026	dmori@anaheim.net					
2452	29	2=Recommended	PLS=Planning and Sustainability	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	3.2-78	**State College Blvd:** Detoured vehicles for northbound State College Blvd would likely continue on Katella Avenue, turn right on Lewis St, turn right on Cerritos Ave, and turn left at State College Blvd to reach their final destination. Should be: Detoured vehicles for northbound State College Blvd would turn left on Katella Avenue, not continue on Katella Avenue	1/27/2026	dmori@anaheim.net					
2453	30	2=Recommended	PLS=Planning and Sustainability	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	3.2-78	Douglass Rd: Detoured vehicles exiting Angel Stadium continuing to Douglass Rd would likely turn right at Stadium Crossing and turn left at Douglass Rd to reach their final destination. Should be: turn right at Katella Ave to reach their final destination, not left at Douglass Road.	1/27/2026	dmori@anaheim.net					
2454	31	3=Information (no response required)	PLS=Planning and Sustainability	RPT - Report/Memo	Vol 1 EIR EIS Section 3.3 Air Quality and Global Climate Change	3.3-61	Segment 3: La Palma Ave to Katella Ave Was an analysis conducted at: Grade separation at Douglass Rd	1/27/2026	dmori@anaheim.net					
2455	32	2=Recommended	PLS=Planning and Sustainability	RPT - Report/Memo	Vol 1 EIR EIS Section 3.4 Noise and Vibration	3.4-54	"Based on a preliminary evaluation, application of N&V-MM#3 will require the installation of an impervious sound barrier at one location, extending from 150 feet south of E Cyprus Street to near E Sycamore Street, with a setback of approximately 12 feet (or less if feasible) from the proposed northbound track centerline and with a height of 8 feet above the top-of-rail elevation." The sound barrier needs to be installed on both sides of the track since there are home just as close on both sides. If installed on just one side the noise will deflect to the other unprotected side.	1/27/2026	dmori@anaheim.net					
2456	33	2=Recommended	PLS=Planning and Sustainability	RPT - Report/Memo	Vol 1 EIR EIS Section 3.8 Hydrology and Water Resources	3.8-47	Table 3.8-8 Federal Emergency Management Agency Floodplains within the Resource Study Area. Why isn't the Santa Ana River listed since it's in the Study Area?	1/27/2026	dmori@anaheim.net					

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Project Section/Contract

Submittal: Project Section Environemntal Documents (Tier 2)- Los Angeles to Anaheim Segment

Date: 02/03/2026 City of Anaheim

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D Disagree. Designer Disagrees for Reasons Noted.

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2457	34	2=Recommended	PLS=Planning and Sustainability	RPT - Report/Memo	Vol 1 EIR EIS Section 3.17 Cultural Resources	3.17-85	617 Multiple APNs Historic Palm District, approximately La Palma Ave, Harbor Blvd, North St, and the BNSF right-of-way (circa 1900–1940) Anaheim Orange Fullerton landmark. N/A/3 2869 Multiple APNs Anaheim Colony Historic District, North, South, East, West Streets (1857–circa 1940) Anaheim Orange Fullerton landmark. N/A/1 Shouldn't the Palm District and the Anaheim Colony be listed as Anaheim landmarks instead of Fullerton landmarks?	1/27/2026	dmori@anaheim.net					
2458	35	1=Mandatory	INF=Infrastructure	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-101	In the PEPD response to comments for the at-grade rail crossings, the response linked to a preliminary impact analysis. City's previous concerns about grade separations were solely tied to the historic district in central Anaheim, where local streets like Sycamore St, Santa Ana St, South St, and Vermont Ave carry high pedestrian volumes and link the neighborhoods. However, the analysis recommended that all rail crossings remain at grade north of Lewis St, not just the crossings that City staff was concerned about. The findings were subjective at best, and does not reflect the future grade separations at Orangethorpe, La Palma, and Ball as identified in the Anaheim General Plan. While we do appreciate the changes to the local street crossings, it is imperative that the major street crossings defied in the Anaheim General Plan are addressed and incorporated.	1/27/2026	dkennedy@anaheim.net					
2459	36	1=Mandatory	INF=Infrastructure	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-101	Orangethorpe Avenue is identified as a future railroad grade separation in the City of Anaheim General Plan Circulation Element. Additionally, OCTA conducted a PSR(E) for this crossing following the OCTA Grade Crossings Study in 2012. This plan does not incorporate, nor is it designed to accommodate the future grade separation, which Orangethorpe Avenue will go under the tracks.	1/27/2026	dkennedy@anaheim.net					
2460	37	1=Mandatory	INF=Infrastructure	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-101	La Palma Avenue is identified as a future railroad grade separation in the City of Anaheim General Plan Circulation Element. This plan does not incorporate, nor is it designed to accommodate the future grade separation.	1/27/2026	dkennedy@anaheim.net					
2461	38	1=Mandatory	INF=Infrastructure	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-101	Ball Road is identified as a future railroad grade separation in the City of Anaheim General Plan Circulation Element. Additionally, OCTA completed the PSR(E) for this crossing following the OCTA Grade Crossings Study in 2012. This plan does not incorporate, nor is it designed to accommodate the future grade separation, which Ball Road will go under the tracks.	1/27/2026	dkennedy@anaheim.net					
2462	39	1=Mandatory	INF=Infrastructure	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-101	Report states that at-grade crossings are far enough from adjacent traffic signals to prevent queues from backing up to the traffic signals. The existence of a pre-signal at the Ball Road and Vermont Ave grade crossings contradicts this finding. The WB crossing at Ball Road can have queuing back up into the Lewis Street intersection when trains are crossing in both directions during either peak hour.	1/27/2026	dkennedy@anaheim.net					
2463	40	1=Mandatory	INF=Infrastructure	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-101	Study makes reference to a document where the gate crossing downtimes are analyzed. However, no link to the document was provided. The results of the study were not summarized. Also, the total gate down time per hour was not reported. The total gate down time would be eight separate crossing activations for the 15 minute headway by direction, plus any peak period freight trains included in the future rail forecasts.	1/27/2026	dkennedy@anaheim.net					

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2464	41	2=Recommended	INF=Infrastructure	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation		Special attention needs to be made for the Broadway crossing, as Fire Station 1 is within 750 feet of the crossing, and increased overall gate downtimes will impact emergency vehicle response times to areas east of the railroad crossing.	1/27/2026	dkennedy@anaheim.net					
2465	42	1=Mandatory	INF=Infrastructure	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation		Please note that any intersection immediately adjacent to or within the vertical curve of the grade separation will need to be analyzed for sight distance. For the Cerritos grade crossing, the study did not analyze the intersections at Vernon Street to the east and Allec Street to the west to determine if traffic signals are needed here.	1/27/2026	dkennedy@anaheim.net					
2466	43	1=Mandatory	INF=Infrastructure	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	2-87, 2-117, 2-122, 3.2-101	The crossings at Sycamore St and South St are not treated consistently through the report. Chapters 2 and 3 for the most part state that both crossings will remain at grade. However, the associated technical studies and PEPD docs imply they will be closed with ped bridges added, and mitigation is recommended based on these closures. Please review the document to ensure that these are treated consistently and that the project description is accurate. Mitigation measures may need to be revised (Transportation for example) if the technical studies are updated to reflect the project description in the EIR/EIS. Please note that the City does not support the closure of these crossings.	1/27/2026	dkennedy@anaheim.net					
2467	44	2=Recommended	INF=Infrastructure	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-68	Please note that the freeway improvement project- SR-57 NB from Orangewood to Katella is under construction. This is an OCTA/Caltrans project funded by OC Go adding one NB lane between Orangewood and Katella, modifying both northbound interchanges.	1/27/2026	dkennedy@anaheim.net					
2468	45	2=Recommended	GEN=General	RPT - Report/Memo			Thank you for acknowledging our requests to coordinate with the City as the projects and plans further develop. We look forward to working with your team as the plans develop. Please involve the City in future design phases so that feedback can be provided early on so that the permit process will be streamlined.	1/27/2026	dkennedy@anaheim.net					
2469	46	3=Information (no response required)	GEN=General	RPT - Report/Memo			The project description now includes the State College Blvd Grade Separation since the grade sep is required for HSR operations. Thank you for this inclusion.	1/27/2026	dkennedy@anaheim.net					
2470	47	2=Recommended	GEN=General	RPT - Report/Memo			For the State College Grade Separation, the OCTA plans do show four tracks, but the two southerly tracks are the connections to the UP line that runs towards the west. The proposed project will move this connection further to the west. My earlier comment in the PEPD was to ensure that there is sufficient width for 2 HSR tracks since the OCE requires slightly additional width. Since the EIR/EIS sets the project footprint, it is important to make sure that there will not need to be an expansion of the footprint if the bridge needs to be slightly wider.	1/27/2026	dkennedy@anaheim.net					
2471	48	2=Recommended	GEN=General	RPT - Report/Memo			Regarding the previous request to extend the 4th eastbound lane to the SR-57 SB on-ramp, we would like to work with you to make this happen. It is roughly 225 feet of private property frontage, the rest is Caltrans ROW. This would be a significant improvement instead of having a lane drop onto private property when many vehicles are looking to access the SR-57 freeway.	1/27/2026	dkennedy@anaheim.net					

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Project Section/Contract

Submittal: Project Section Environemntal Documents (Tier 2)- Los Angeles to Anaheim Segment

Date: 02/03/2026 City of Anaheim

Action Codes:

A Agree. Designer Agrees and will comply/take action

D Disagree. Designer Disagrees for Reasons Noted.

N Noted. Answer provided in response; no action nee

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2472	49	2=Recommended	GEN=General	RPT - Report/Memo			It is our understanding that coordination between OC Vibe and HSR is underway in regards to station location and parking, and that OC Vibe does appear to be generally supportive of the concept. However, the proposed parking lot modifications in the stadium parking lot encroach outside of the area set aside for station parking and into exclusive stadium only parking. Please reach out to Angels and City staff and coordinate with them regarding the future parking lot restriping. Note that this area is slated for future development that could tie in to the station and parking areas.	1/27/2026	dkennedy@anaheim.net					
2473	50	1=Mandatory	GEN=General	RPT - Report/Memo			Please note that Douglass Road no longer connects Katella Ave to Cerritos Ave. Also note that Phoenix Club Drive will connect to Katella Avenue and is now named River Road. Currently under construction, it will provide a direct connection between Ball Road and Katella Avenue east of SR-57. These changes will affect traffic flow and will result in the reduction of needed mitigation at Sunkist/Cerritos, and may introduce impacts at the River/Ball or River/Katella intersections.	1/27/2026	dkennedy@anaheim.net					
2474	51	1=Mandatory	GEN=General	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-122	For intersection mitigation measures, please use the Anaheim General Plan Circulation Element buildout intersection configurations first. It appears you may be using existing conditions and adding improvements, some which are not consistent with out General Plan. We have no desire to overbuild intersections. Use of our buildout project improvements may eliminate the need to introduce new turn lanes. The next comments will summarize the configurations to consider first before adding anything else that may be needed.	1/27/2026	dkennedy@anaheim.net					
2475	52	1=Mandatory	GEN=General	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-133	G44- East St. and Lincoln Ave. It is assumed that these improvements are only needed if Sycamore St crossing is closed. The Project Description repeatedly says it will stay open at-grade. With that being said, if improvements are still needed here, the GP has cleared these improvements- NB- 1L, 2T, 1R. SB- 2L, 2T, 1R. EB- 1L, 2T, 1TR. WB 1L, 3T, 1R. Note recent construction identified in Jose Cortez's comment added the third EB through lane on Lincoln Ave (converted from right turn only lane) and should be considered as existing. So, consider these improvements first- add NB right turn lane, add WB right turn lane, add SB left turn lane.	1/27/2026	dkennedy@anaheim.net					
2476	53	1=Mandatory	GEN=General	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-139	F26- Lemon St and Orangethorpe Ave. Share with Fullerton, the ultimate config is- NB and SB- 1L, 2T, 1R; EB 1L, 2T, 1TR; WB 2L, 2T, 1TR. Before adding the EB right, please use the existing WB config and add one WB thru lane first. Then add other improvements if needed.	1/27/2026	dkennedy@anaheim.net					
2477	54	1=Mandatory	GEN=General	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-140	F28- Anaheim/Lemon/SR-91 EB ramps. The proposed EB improvements will result in the intersection not being lined up. While this is a Caltrans intersection it is the intersection with the highest collision rate in Anaheim. Therfore, it is imperative to not introduce improvements that could result in an increased accident rate. The EB on-ramp would need to be shifted to align with the proposed striping.	1/27/2026	dkennedy@anaheim.net					
2478	55	1=Mandatory	GEN=General	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-140	A14- State College/Orangewood. This improvement is unacceptable. Right turns must be allowed at all times. Please note that the recent construction project mentioned in Jose Cortez's comments shows a widened westbound approach that now has 2L, 3T, 1R. Otherwise, this intersection is at its ultimate condition.	1/27/2026	dkennedy@anaheim.net					

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D Disagree. Designer Disagrees for Reasons Noted.

N Noted. Answer provided in response; no action nee

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2479	56	1=Mandatory	GEN=General	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-141	A17- Sunkist/Cerritos. These improvements will most likely be scaled back as a result of the existing permanent closure of Douglass Road north of Katella Ave, and the introduction of River Road further to the east replacing much of this traffic. With this being said, the ultimate condition for all four approaches is 1L, 1T, 1TR. Please start with this configuration before adding additional mitigation.	1/27/2026	dkennedy@anaheim.net					
2480	57	1=Mandatory	GEN=General	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-141	A79- Anaheim/Cerritos. The ultimate configuration here is: NB- 1L, 3T, 1R; SB- 2L, 2T, 1TR; EB- 1L, 1TR; WB- 2L, 1TR, 1R. So, from existing conditions, start with these first- add 1 SB left, add 1 WB left, restripe WB through to WB TR.	1/27/2026	dkennedy@anaheim.net					
2481	58	1=Mandatory	GEN=General	RPT - Report/Memo	Vol 1 EIR EIS Section 3.2 Transportation	Page 3.2-144	For Lemon Street south of Orangethorpe, the limits should be SR-91 to Orangethorpe Avenue. This would be consistent with the Circulation Element for both the Cities of Fullerton and Anaheim.	1/27/2026	dkennedy@anaheim.net					
2482	59	2=Recommended	INF=Infrastructure	Drawings			Show all existing water mains/ services. All prior comments shall apply.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2483	60	2=Recommended	GEN=General	RPT - Report/Memo			All water mains/facilities(pump stations/ pressure reducing station) affected by grade separation shall be coordinated Anaheim Public Utilities(APU). All relocations/abandonments and installation shall be per (APU) standards and specification and administrative guidelines. All horizontal and vertical clearances shall be maintained. Prior to relocation/abandonment of any water improvements, a temporary water system shall be established to serve all our existing customers.	1/28/2026	mvora@anaheim.net; Madhvi Vora					
2484	61	3=Information (no response required)	GEN=General	SPEC - Specifications			https://www.anaheim.net/710/Standard-Specifications-Requirements	1/29/2026	mvora@anaheim.net; Madhvi Vora					
2485	62	2=Recommended	INF=Infrastructure	RPT - Report/Memo			For all widening of track, water mains shall be relocated(typ)	1/30/2026	mvora@anaheim.net; Madhvi Vora					
2486	63	1=Mandatory	GEN=General	RPT - Report/Memo	LAA-PEPD-Vol3.4_Record_Set_3-a11y_508	UT-D1607 through UT-D1623	(TYP for all applicable sheets) With high speed rail, we will require structural calculations for each street crossing, to confirm that the existing pipe under the railroad will be able to handle the proposed dead and live load. We will need structural calculation with findings for the proposed main. Also, life cycle of each pipe shall be evaluated during the pre design phase and all recommendation shall be presented to APU to make the final decision.	1/30/2026	mvora@anaheim.net; Madhvi Vora					
2487	64	2=Recommended	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.4_Record_Set_3-a11y_508	UT-D1607 through UT-D1623	LA Palma Ave: Station 1407+00, there is an 16" CCP in a 28" Diameter steel casing approx. Refer to note 5	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2488	65	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.4_Record_Set_3-a11y_508	UT-D1607 through UT-D1623	North Street: Station 1413+00Existing 12" water main with 24" steel casing approx. 7.7' cover . Refer to note 5	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2489	66	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.4_Record_Set_3-a11y_508	UT-D1607 through UT-D1623	Sycamore Street: Station 1429+00 Existing 12" DIP 22" Steel casing 6' cover. Refer to note 5	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2490	67	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.4_Record_Set_3-a11y_508	UT-D1607 through UT-D1623	E. Cypress Street: Station between station 1437+00 and 1438+00-10" DIP main with 20" Steel casing approx. 5.5' cover. Refer to note 5.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2491	68	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.4_Record_Set_3-a11y_508	UT-D1607 through UT-D1623; CV-T1476	South of Lincoln Ave; Between Station 1445+00 and 1446+00; there is an existing 18" CIP with 30" casing with a cover of approx 3'0". Refer to note 5.	1/27/2026	mvora@anaheim.net; Madhvi Vora					

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Action Codes:

A Agree. Designer Agrees and will comply/take action

D Disagree. Designer Disagrees for Reasons Noted.

N Noted. Answer provided in response; no action nee

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2492	69	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_509	CV-T0491	Broadway Ave: Station 1454+00; 12" DIP with 24" steel casing. Approx.. 4'7" cover. Refer to note 5.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2493	70	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_504	CV-T0491	Santa Ana Street: Station 1462+00; 12" DIP with 24" Steel Casing approx. 5.5' cover. Refer to note 5.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2494	71	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_505	CV-T0491	South Street: Station approx. 1479+00; 12" DIP with 24" steel casing 4.5' cover. Refer to note 5.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2495	72	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_506	CV-T0511	Vermont Street: Station 1492+32.71 there is an existing 16" DIP with 30" casing with a cover of approx. 4.0'. Refer to note 5.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2496	73	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_507	CV-T0521	Ball Road: Station 1518+00-18" CCP" water casing; 4' cover W-1934. Built in 1955. Refer to note 5.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2497	74	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_508	CV-T1542	Lewis Street: Crossing Station 1538+00. 16" CCP line 6' cover. Lowering Lewis Street will require relocation of the water main and all related water service, meters on Lewis Street. This will also impact water main connections to cross street.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2498	75	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_508	CV-T1542	Lewis Street: Approx. Crossing Station 1538+00. Grade separation. Show and label MWD line; A-5 connection. Refer to note 5.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2499	76	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_508	CV-T1551, CV-T1552 and CV-T1553	Cerritos Ave: Crossing Station 1548+00 With lowering Cerritos, existing 12" CIP with 20" casing with 4' cover shall be relocated per City of Anaheim Standards. All related water service, meters shall be relocated from 15+00.00 to 37+25.00. Refer to note 5.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2500	77	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_508	CV-T1554	The existing 10" CIP line shall be abandoned and install a new minimum 12" DIP line with lowering the grade for Vernon Street. All mains shall be install per City of Anaheim Water Standards and Specification.		mvora@anaheim.net; Madhvi Vora					
2501	78	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_508	CV-T1556	There is an existing PR station and vault at the intersection of Cerritos and Lewis Street. Lowering Cerritos will require all vaults and stations to be brought to grade.		mvora@anaheim.net; Madhvi Vora					
2502	79	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_508	UT-Y1558	State College Blvd Ave: Approx. Station 1576+00 18" CCP line; approx.. 4.5' cover. Proposed underpass.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2503	80	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_508	CV-T0571; CV-T1571; CV-T1572	Katella Ave: Station 1589+23.94 There is an existing 12" CIP which needs to be lowered/relocated per City standards due to lowering of Katella Ave due to Grade separation.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2504	81	3=Information (no response required)	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_508	UT-Y1576	Show existing Well 45 and PFAS treatment facilities east of Katella Ave. Any impact to the Well site and PFAS treatment shall be evaluated prior to design.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2505	82	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_508	CV-T0581	Approx. Station 1595+00: 8" CIP with 18" steel casing. Approx. 11' deep	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2506	83	1=Mandatory	INF=Infrastructure	Drawings	LAA-PEPD-Vol3.3_Record_Set_3-a11y_508	CVT-T0581; CV-T1581; CV-T1582	The is an existing and proposed extension of 16" DIP water main in Douglass Street. Lowering the grade require relocation of 16" water main.	1/27/2026	mvora@anaheim.net; Madhvi Vora					

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Action Codes:

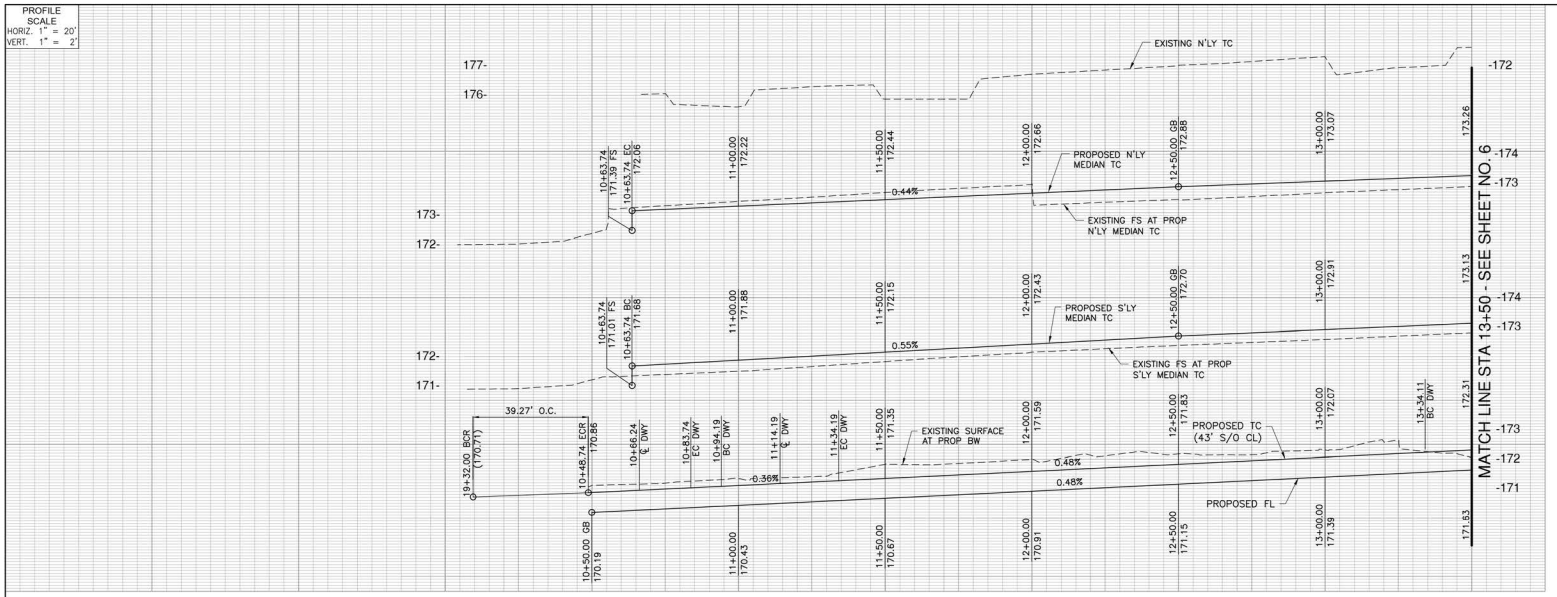
A Agree. Designer Agrees and will comply/take action

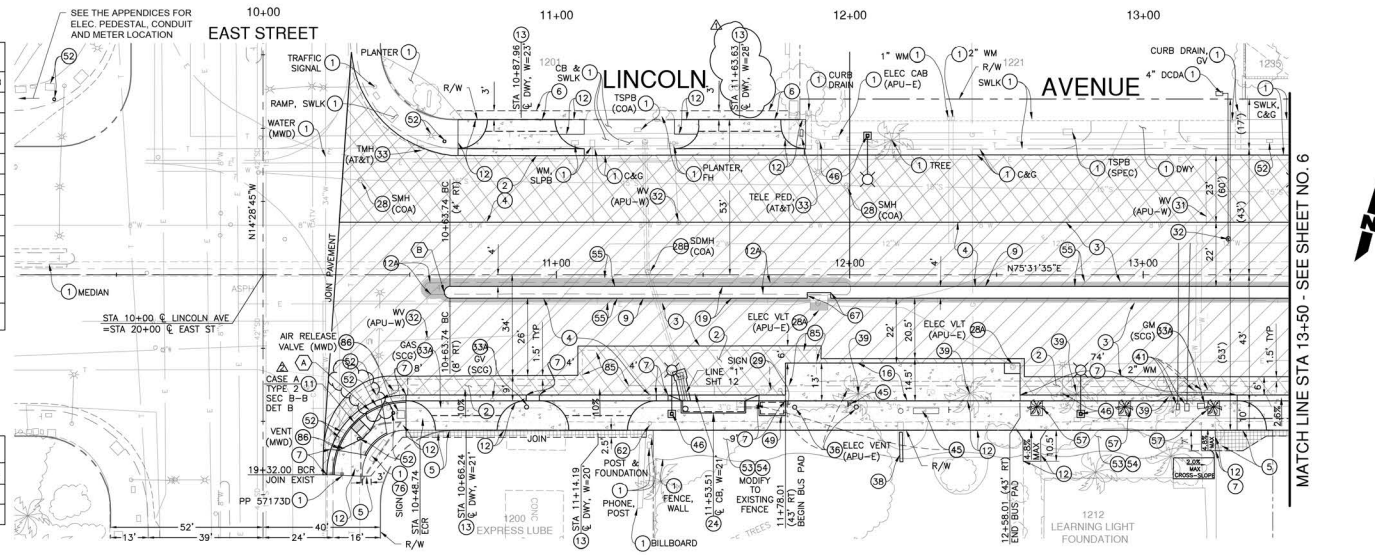
D Disagree. Designer Disagrees for Reasons Noted.

N Noted. Answer provided in response; no action nee

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2507	84	3=Information (no response required)	GEN=General	RPT - Report/Memo	LAA_EIR_EIS_06_Costs-508.pdf	6.2.1: Capital Cost	Utility relocation. Please confirm that abandonments of existing main and installation of new mains shall be paid for by CHSR. With existing and proposed new demands, APU-Water is required to extend the existing 16" in Douglass road under the railroad and connect to the water main west of CA-57 to the existing loop around Angel Stadium. During the design and permitting phase of CHSR, relocation of this existing main shall be paid by CHSR.	1/27/2026	mvora@anaheim.net; Madhvi Vora					
2508	85	2=Recommended	GEN=General			General	Prior to approval of permits for improvement plans, the applicant shall coordinate with Water Engineering to establish water service requirements and submit site plans, elevation plans, and related technical drawings and specifications. An Utility Water Meter Application shall be opened with Anaheim Public Utilities for all any water utility relocation.	1/28/2026	mvora@anaheim.net; Madhvi Vora					
2509	86	1=Mandatory	GEN=General	SM - Scroll Maps	LAA-PEPD-Vol3.4_Record_Set_4-a11y_508	CO-F1151	There are existing PFAS treatment facilities which shall be protected in place. All clearance shall be maintained.		mvora@anaheim.net; Madhvi Vora					
2510	87	1=Mandatory	SS=Safety and Security		Volume 3.3A-State College Grade Seperation		Fire access shall not be affected or a detail plan of proposed fire access shall be provided for storage space, 1961 E Wright Circle and 1981 E Wright Circle	2/3/2026	drodriguez4@anaheim.net					
2511	88	1=Mandatory	SS=Safety and Security				ire access shall be provided for Pump Station and Basin Maintenance Storage Building	2/3/2026	drodriguez4@anaheim.net					
2512	89	1=Mandatory	SS=Safety and Security				All new construction for the HSR pick-up/drop-off location, radio towers, elevator building, seating canopy, or any other proposed structures shall comply with fireworks fallout requirements. The HSR location proposed is located within the Anaheim Stadium firework fallout zone. The HSR facilities will need to be evaluated for the current fallout zone for pyrotechnics currently utilized at Angel Stadium	2/3/2026	drodriguez4@anaheim.net					
2513	90	1=Mandatory	SS=Safety and Security				Proposed bridges/tunnels shall have a minimum vertical clearance of 14 feet.	2/3/2026	drodriguez4@anaheim.net					
2514	91	1=Mandatory	SS=Safety and Security				Any affected public or private fire hydrants shall be reinstalled in close proximity to original location(s). Consultation with City of Anaheim Water Engineering and Fire Department shall be required.	2/3/2026	drodriguez4@anaheim.net					

PROFILE
SCALE
HORIZ. 1" = 20'
VERT. 1" = 2'





UTILITY ADJUSTMENTS

STATION	OFFSET	UTILITY	OWNER
10+34.33	±32.25' LT	SMH	COA
10+54.03	±43.15' LT	TMH	AT&T
10+56.05	±21.62' RT	WV	COA
11+31.45	±1.00' LT	SDMH	COA
11+41.61	±17.83' LT	WV	COA
11+89.19	±09.63' RT	VAULT	COA
11+99.24	±30.17' LT	SMH	COA
12+55.56	±31.35' RT	VAULT	COA
13+18.00	±20.50' LT	WV	COA
10+47.06	±46.44' LT	AIR VALVE	COA
10+27.81	±59.65' RT	AIR VALVE	COA

CURVE DATA

	RADIUS	DELTA	LENGTH
A	25.00'	90°00'21"	39.27'
B	2.00'	180°00'00"	6.28'

CONSTRUCTION NOTES

1. PROTECT IN PLACE
2. REMOVE EXISTING SURFACE, PCC, AC/AC BASE AND BASE 10.5" BELOW PROPOSED FINISHED SURFACE. CONSTRUCT 8" THICK TYPE B PG-70-10 AC PAVEMENT OVER RE-COMPACTED BASE.
3. COLDMILL EXISTING PAVEMENT SECTION TO NO MORE THAN 4" BELOW PROPOSED SURFACE. CONSTRUCT 1.5" TYPE B PG-70-10 AC PAVEMENT.
4. CONSTRUCT MINIMUM 0.21' (2.5") THICK ARHM-GG-B OVERLAY.
5. SAWCUT AND REMOVE EXIST. SURFACE, AC PAVEMENT TO NEW SUBGRADE. CONSTRUCT 0.50' TYPE B PG-70-10 AC PAVEMENT TO JOIN NEW IMPROVEMENTS.
6. SAWCUT AND REMOVE EXIST. SURFACE, PCC PAVEMENT TO NEW SUBGRADE. CONSTRUCT 0.5' PCC PAVEMENT TO JOIN NEW IMPROVEMENTS.
7. REMOVE EXIST. SURFACE, PCC CURB, CURB & GUTTER AND RE- CONSTRUCT 8" CURB & GUTTER PER CITY OF ANAHEIM STD. PLAN 120, TYPE A.
9. REMOVE EXISTING SURFACE AND CONSTRUCT 8" CURB PER CITY OF ANAHEIM STD. PLAN 120, TYPE D.
12. REMOVE EXIST. SURFACE, SIDEWALK, AC, OR LANDSCAPE & CONSTRUCT 4" PCC SIDEWALK PER CITY OF ANAHEIM STD PLAN 110-B (MATCH EXISTING SIDEWALK).
12A. REMOVE EXIST. SURFACE, SIDEWALK, AC, CURB, RAISED MEDIAN, AND/OR LANDSCAPE.
13. REMOVE EXIST. SURFACE & RECONSTRUCT PCC COMMERCIAL DRIVEWAY APPROACH PER CITY OF ANAHEIM STD PLAN 115-E CASE 2.
16. REMOVE EXIST. SURFACE, CURB/CURB & GUTTER AND PAVEMENT AND CONSTRUCT 10" THICK MONOLITHIC CONCRETE BUS PAD AND CURB & GUTTER PER DETAILS ON SHEET 4 AND OCTA DESIGN GUIDELINES FIGURE 2.3.
19. CONSTRUCT 4" (MIN) STAMPED COLORED CONCRETE MEDIAN PER CITY OF ANAHEIM STD. PLAN 143. FULL WIDTH OR 12" WIDE WHERE LANDSCAPED. REMOVE EXISTING SURFACE AND PAVEMENT TO SUBBASE. ADD COMPACTED FILL AS NEEDED. COLOR AND STAMP SHALL MATCH NEARBY RAISED MEDIANS.
28A. LOWER, RAISE, AND ADJUST ELECTRICAL VAULT TO GRADE.
29. RELOCATE EXISTING SIGN(S) AND POST.
31. LOWER, RAISE AND ADJUST TO GRADE WATER VALVE BOX ASSEMBLY PER CITY WATER STD. W-152, CASE 1.
32. LOWER, RAISE AND ADJUST TO GRADE WATER VALVE BOX ASSEMBLY PER CITY WATER STD. W-152, CASE 2.
33. ADJUST TO GRADE BY OTHERS.
33A. RELOCATE BY OTHERS.
36. RELOCATE EXISTING ELECTRICAL INFRASTRUCTURE. COORDINATE NEW LOCATION WITH APU-E.
38. RELOCATE OR CONSTRUCT BUSINESS SIGN/SIGN POST PER APPROVED BUILDING PERMITS, PLAN, & DETAILS.
39. REMOVE AND DISPOSE OF EXISTING TREE AND ROOTS.
41. REMOVE EXISTING WATER METER AND BOX, CAP SERVICE AT MAIN. SALVAGE METER TO THE WATER INSPECTOR. INSTALL NEW LATERAL SERVICE, NEW WATER METER, AND NEW WATER METER BOX PER CITY WATER STD. W-101 (1") OR W-102 (2"), INCLUDING TRENCH. SEE PLANS FOR SIZE.
45. REMOVAL AND DISPOSAL OF EXISTING (IF APPLICABLE) AND FURNISH AND INSTALL BUS STOP SIGN, FURNITURE, AND TRASH RECEPTACLE AT EACH BUS STOP. FOR CONFIGURATION, REFER TO SHEET 4.
46. REMOVE EXISTING STREET LIGHT, FOUNDATION AND WIRING. INSTALL STREET LIGHT, FOUNDATION AND WIRING IMPROVEMENTS PER STREET LIGHT SHEETS. REFER TO GENERAL NOTE 20.
49. INSTALL MODULAR WETLANDS STORMWATER BIOFILTRATION SYSTEM, MWS-L-4-8-C (FULL CAPTURE FOR TRASH AND SOFT BOTTOM) PER MODULAR WETLANDS MANUFACTURER SHTS.
52. REFER TO TRAFFIC SIGNAL AND FIBER OPTIC SHEETS FOR IMPROVEMENTS
53. REGRADE 2:1 MAX, 4:1 MAX IN LANDSCAPED AREAS.
54. REPLACE, MODIFY, OR PROTECT IRRIGATION, LANDSCAPING, AND APPURTENANCES IMPACTED BY CONSTRUCTION TO MATCH EXISTING.
55. SAWCUT AND EXCAVATE EXISTING AC PAVEMENT TO A MINIMUM DEPTH OF 8" BELOW FINISHED SURFACE AND 1.5" WIDE. CONSTRUCT 5.5" THICK TYPE B PG-70-10 AC PAVEMENT.
57. ALL TREE WELLS 4'WX5'D U.N.O. ON PLANS WITH AN ASTERISK THEN TREE WELL IS 5X5'. SEE IRRIGATION PLANS AND PLANTING PLANS.
62. REMOVE EXISTING BOLLARD/PLASTER INCLUDING FOUNDATION
76. REMOVE EXISTING PLANTER, LANDSCAPING, AND BRICKS. RECONSTRUCT BRICK WALL AROUND SIGN FOUNDATION. INSTALL PCC TO CAP THE TOP OF THE PLANTER.
86. REMOVE EXIST. AND CONSTRUCT AIR RELEASE-VACCUM VALVE AND VENT PER STD. STP-242, STP-244, STP-250 AND STP-252. CONTRACTOR TO SUBMIT PLANS TO MWD FOR APPROVAL.

LINCOLN AVE. - EAST ST. TO EVERGREEN AVE.

UNDERGROUND SERVICE ALERT
CALL: 811
TWO WORKING DAYS BEFORE YOU DIG

REVISIONS				
NO.	DATE	DESCRIPTION	ENGR.	APPROV.
1	10/20/23	CONSTRUCTION NOTE, CALL OUT,	J.H.	J.H.
2	1/11/24	ADDED LEADER	J.H.	J.H.

REFERENCES

FOR NOTES TO CONTRACTOR SEE PLAN NOs 38718-38719

FOR STANDARD DETAILS SEE: COA 110-B, 111, 114-A, 115-B, 120, 121-A, 122, 140-2, 143, 150, 205, 313, 324, 350-B, 385, 426, 452, 453, 454, 456, 457, 459, 477, 623, W-101, W-102, W-110, W-152, W-207, W-220, W-229, SPPWC 111-3, 122-2, 150-2, 300-3, 380-4, OCTA FIGURE 23, CT 22, 451

STREET PLAN NO's: 38721-38728 | STRIPING PLAN NO's: 38736-38737

DIST. MAP NO. 93, 103 | BENCH MARK NO. 4A-37 | ELEV. 177.22' (NAVD88)

BASIS OF BEARING: CENTERLINE OF LINCOLN AVE BEING N75°31'34"E

PREPARED BY:
ARDURRA
3737 BIRCH STREET, SUITE 250
NEWPORT BEACH, CA 92660
P: 949.428.1500 F: 949.258.5053

SCALE: 1"=20' | DESIGNED BY: M.H. | REVIEWED BY: J.H.

PLAN PREPARED UNDER THE SUPERVISION OF:

PROJECT ENGINEER
68384 09/30/2025 06/02/2023
R.C.E. No. EXPIRATION DATE DATE

CITY OF ANAHEIM
DEPARTMENT OF PUBLIC WORKS
200 SOUTH ANAHEIM BLVD. #276
ANAHEIM, CA 92805
(714) 765-5176
www.anaheim.net

STREET IMPROVEMENT
LINCOLN AVENUE
EAST STREET TO 350' EAST OF EAST STREET

CITY OF ANAHEIM
DEPARTMENT OF PUBLIC WORKS

RCP 2017-12892

SHEET 5 OF 55

PLAN NUMBER 38722

P:\Projects\Anaheim\Lincoln Avenue - East to Evergreen\Work\CAD\PLAN SHEETS\05-STPP.dwg 01/15/2024 10:38

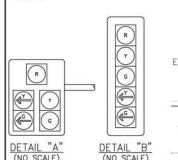
LINCOLN AVE. - EAST ST. TO EVERGREEN AVE.

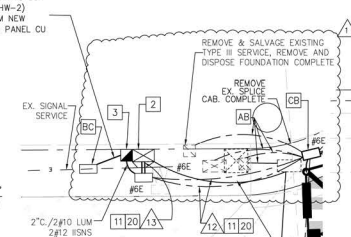
POLE SCHEDULE

No.	STANDARD TYPE	HEIGHT	MAST ARM SIGNAL	MAST ARM LUM	LED LUMINAIRE	LED I.S.N.S. LEGEND	SIGNAL MTGS VEHICLE	SIGNAL MTGS PED	PED PUSH BTN PHASE	PED PUSH BTN ARM	LOCATION A	LOCATION B	REMARKS
1	61-5-100(N)	30'	65'(N)	15' (N)	136W(R)	East St (R)	3-MAS(N)	SV-1-T(N)	SP-1-T(N)	#6(N)	LT	9.5'	4'	10 21
2	1-A	10'	---	---	---	---	---	TV-1-T	SP-1-T	#8(N)	RT	13'	3.5'	22 DETAIL "B"
3	24-4-80	30'	35'	15'	136W	Lincoln Ave	MAS-5A MAS	SV-1-I	SP-1-I	#8(N)	LT	10'	7'	10 22 DETAIL "A"
4	15 TS (N)	30'	---	15' (N)	136W(R)	---	---	SV-1-T(N)	SP-1-T(N)	#2(N)	RT	7.4'	3.5'	
5	29-5-100(N)	30'	45'(N)	15' (N)	136W(R)	East St (R)	3-MAS(N)	SV-1-T(N)	SP-1-T(N)	#2(N)	LT	4.8'	4.2'	10
6	15 TS (N)	30'	---	15' (N)	136W(R)	---	---	SV-1-T(N)	SP-1-T(N)	#4(N)	RT	12.3'	8.8'	DETAIL "B"
7	19-4-80	30'	25'	15'	136W	Lincoln Ave	MAS-5A MAS	SV-1-T	SP-1-T	#4(N)	LT	14.5'	6.4'	10 22 DETAIL "A"
8	CCTV TYPE II	45'	---	15'	136W	---	---	SV-1-T	SP-1-T	#6(N)	RT	10.8'	4.5'	19 22

ALL EQUIPMENT SHALL BE EXISTING UNLESS SHOWN OTHERWISE (N)=NEW, (R)=RELOCATED
ALL IISNS ARE PERIMETER LIT LED WITH CITY SEAL FACE PANEL.
ALL NEW RECTANGULAR SAFETY LIGHTING SHALL BE LED IN ACCORDANCE WITH THE SPECIFICATIONS AND PER UTILITIES DEPT T&D CONSTRUCTION STD NOS. 126 &127. CONTRACTOR TO SUBMIT DOCUMENTATION APPROVAL PER UTILITIES REQUIREMENTS.
ALL NEW PPB SHALL BE APS COMPLIANT WITH AUDIBLE SPEECH AND VIBROTACTILE FEATURES ACTIVE.
SIGNAL WORK SHALL BE COMPLETED BEFORE BEGINNING THE ASPHALT WORK ALONG LINCOLN AVENUE.

PROVIDE AND INSTALL 1-3" GRAY PVC SCH 80 CONDUIT WITH 3-1/0 AL (XHHW-2) CONDUCTORS, 36"MIN. DEEP FROM NEW 13"X24" PULLBOX TO NEW METER PANEL CU 1500-5.





CONDUCTOR SCHEDULE

AWG	CIRCUIT	RUN NO. 1	2	3	4	5	6	7	8	9	10	11	12	13	14
#14	Ø1	3			3					3			3	3	
	Ø2					EMPTY SPARE WITH PULL ROPE			3			3	3	3	
	Ø3		3							3			3	3	
	Ø4						3	3	3			3	3	3	
	Ø5								3			3	3	3	
	Ø6	3			3					3			3	3	
	Ø7						3	3	3			3	3	3	
	Ø8												3	3	
	ØØP						2	2	2			2	4	4	
	ØAP	2	2		2					2			4	4	
	Ø6P	2								2		2	4	4	
	Ø8P								2	2			2	4	4
	Ø2 APS PPB							2	2	2			2	2	2
	Ø4 APS PPB	2			2					2			2	2	2
	Ø6 APS PPB		2							2			2	2	2
	Ø8 APS PPB								2			2	2	2	2
	PB COMMON	1	1		1		1	1	1	1		1	2	2	2
	SPARES	3	3		3		3	3	3	3		3	6	6	
	TOTAL	16	11		14		14	16	24	21		26	56	56	
#12	IISNS	2					2	2	2	2			2		
#10	SIGNAL COMMON	1	1		1		1	1	1	1		1	2	2	
	LUMINAIRE	2	2		2		2	2	2	2		2	2	2	
DLC (TYPE G)	Ø2	2			2					2			2	2	
	Ø4									3			3	3	
	Ø6											2	2	2	
	Ø8							3	3			3	3	3	
	TOTAL	2			2			3	3	5		5	10	10	
#2	SIGNAL SERVICE													3	
96 SMFO	PER IIC PLAN			1							1		1	1	1
	CCTV (CAT6)		1							1			1	1	
VIDEO CABLE		1					1	1	2	1		2	4	4	
5PR #20	EVP												1	1	
CONDUIT SIZE		3"N	3" *	3" *	3"N	3"N	3"N	4"N	4"N	2.5" *	3" *	4"N	2-4"N	2-4"N	3"N

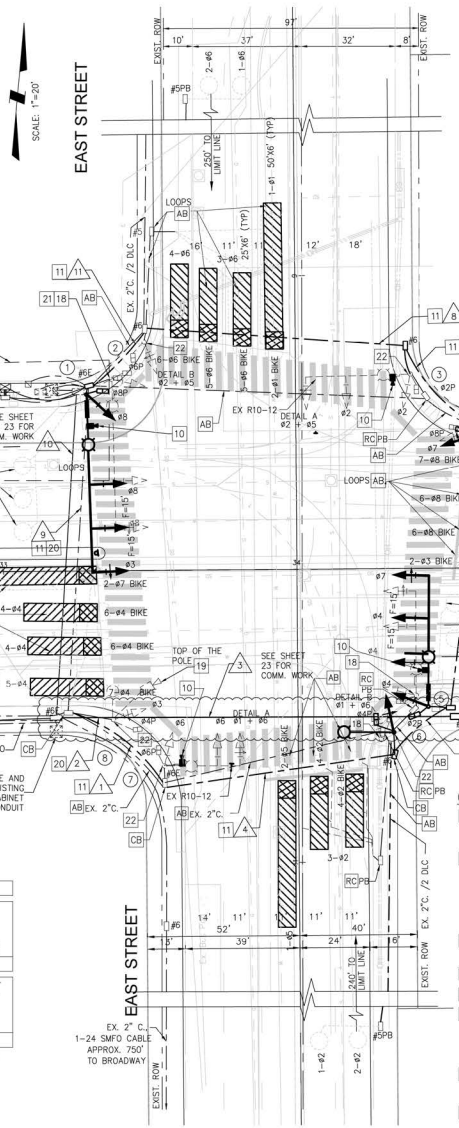
* - FOR EXISTING CONDUIT RUNS DESIGNATED WITH AN *** ABOVE, THE CONTRACTOR SHALL ADD/INSTALL NEW CONDUCTORS/CABLES IN EXISTING CONDUIT AS DESIGNATED IN THE CONDUCTOR SCHEDULE.
CONDUCTOR SCHEDULE IS FURNISHED AS AN INSTALLATION GUIDE ONLY. IT SHALL BE THE CONTRACTORS RESPONSIBILITY TO PROVIDE THE CORRECT CONDUCTORS REQUIRED FOR THE INTENDED OPERATIONS.

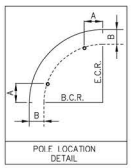
CALTRANS STD. NOTES

UNDERGROUND SERVICE ALERT
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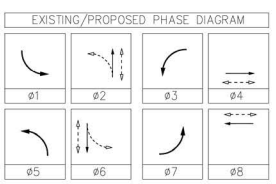
- AB ABANDON. IF APPLIED TO CONDUIT, REMOVE CONDUCTORS.
- BC INSTALL PULL BOX IN EXISTING CONDUIT RUN.
- CB INSTALL CONDUIT INTO EXISTING PULL BOX.
- CC CONNECT NEW AND EXISTING CONDUIT. REMOVE EXISTING CONDUCTORS AND INSTALL CONDUCTORS AS INDICATED.
- RC EQUIPMENT OR MATERIAL TO BE REMOVED AND BECOME THE PROPERTY OF THE CONTRACTOR.

NOTE: THIS PLAN IS ACCURATE FOR ELECTRICAL WORK ONLY





EXISTING/PROPOSED PHASE DIAGRAM



PHASE 1 AND PHASE 5 SHALL ONLY FOLLOW PHASE 4 AND PHASE 8.

CONSTRUCTION NOTES (THIS SHEET)

1. CONTRACTOR SHALL BE RESPONSIBLE FOR MAINTAINING EXISTING TRAFFIC SIGNAL OPERATIONAL DURING CONSTRUCTION.AFTER SWITCHING OVER THE SIGNAL OPERATIONS FROM EXISTING CABINET TO THE NEW CABINET, REMOVE AND DISPOSE OF EXISTING TYPE P CABINET AS DIRECTED BY THE ENGINEER. REMOVE COMPLETE FOUNDATION.
2. FURNISH AND INSTALL NEW P-PLUS CABINET (TS2) ON NEW 12' RAISED FOUNDATION. INSTALL NEW 2070L CONTROLLER EQUIPPED WITH 2070-1C MODULE WITH EOS SOFTWARE PRE-INSTALLED, AND 2N I/O MODULE. NEW P-PLUS CABINET SHALL BE EQUIPPED WITH APS SYSTEM, FIBER OPTIC DISTRIBUTION UNIT, FIBER OPTIC ETHERNET SWITCH, IP-BASED SAFETY MONITOR UNIT, RELOCATE EXISTING GPS EMERGENCY VEHICLE PRE-EMPTION UNIT TO NEW CABINET. THIS SHALL INCLUDE ALL NECESSARY ACCESSORIES AND APPURTENANCES TO PROVIDE THE INTENDED OPERATION. REFER TO FOUNDATION DETAIL-B ON SHEET 22.
3. FURNISH AND INSTALL TYPE II SERVICE ENCLOSURE WITH 100 AMP MAIN, 30 AMP (UNMETERED) SAFETY LIGHTING, 50 AMP METERED SIGNAL AND 15 AMP IISNS WITH APPURTENANCES TO PROVIDE THE INTENDED OPERATION.
5. SPLICE NEW DLC WIRES WITH NEW LOOP WIRE IN THE PULL BOX FOR SEPARATE LANE ASSIGNMENT.
8. INSTALL TYPE "E" LOOP DETECTORS AS SHOWN WITH NEW STUB OUT.
10. REMOVE AND SALVAGE EXISTING VIDEO DETECTION SYSTEM. FURNISH AND INSTALL VIDEO DETECTION SYSTEM WITH COMMUNICATION MANAGER IN CONTROLLER CABINET PER SPECIAL PROVISIONS AND MANUFACTURERS DIRECTIONS. VIDEO DETECTION CAMERA CABLES SHALL MEET MANUFACTURER'S REQUIREMENTS. ALL VIDEO DETECTION ZONES SHALL BE APPROVED BY THE CITY TRAFFIC SIGNAL MAINTENANCE REPRESENTATIVE. REFER TO STANDARD PLAN RSP ES-7R DETAIL B.
11. INSTALL NEW CONDUIT WITH CONDUCTORS, AND DLC PER CONDUCTOR SCHEDULE. ALL CONDUITS CROSSING THE ROAD SHALL BE BORED AND CONDUITS BEHIND THE CURB SHALL BE TRENCHED. REFER TO COA STANDARD 132 FOR CONDUIT TRENCHING REQUIREMENT.
18. REMOVE AND SALVAGE EXISTING STANDARD AND EQUIPMENT COMPLETE. REMOVE FOUNDATION COMPLETE. RELOCATE EXISTING ILLUMINATED STREET NAME SIGN TO NEW LOCATION WHERE APPLICABLE.
19. PROTECT EXISTING CCTV CAMERA IN PLACE.
20. FURNISH AND INSTALL NEW CAT6 CAMERA CABLE TO ACHIEVE THE INTENDED OPERATION. USE EXISTING CCTV WIRE AS PULL ROPE.
21. RELOCATE AND TEST GPS EVP WITH NEW P-PLUS CABINET AND CONTROLLER.
22. SALVAGE EXISTING PPB. FURNISH AND INSTALL APS COMPLIANT APS PPB PER SPECIAL PROVISIONS.

TRAFFIC SIGNAL GENERAL NOTES:

1. ALL WORK SHALL CONFORM TO THE CURRENT CITY OF ANAHEIM STANDARDS AND SPECIFICATIONS, REVISED 2018 CALTRANS STD. PLANS AND SPECIFICATIONS, AND THE SPECIAL PROVISIONS FOR THIS PROJECT.
2. THE ENGINEER SHALL APPROVE THE POLE AND DETECTOR LOCATIONS PRIOR TO INSTALLATION BY THE CONTRACTOR.
3. ALL PULL BOXES SHALL BE #6 UNLESS SHOWN OTHERWISE AND SHALL BE SPACED MAXIMUM OF 500'.
4. CONTRACTOR SHALL NOTIFY ALL UTILITIES AT LEAST THREE WEEKS PRIOR TO BEGINNING WORK, AS FOLLOWS:
   USA 1-800-422-4133
   MWD 1-213-217-6000 (LES BARRETT)
   SCE 1-714-870-3210 (TERRY KERR)
5. PROTECT ALL WATER SERVICES, FIRE HYDRANTS, AND VALVES IN PLACE, WITH MINIMUM 2 FEET CLEARANCE.
6. ALL CONDUIT SHALL BE MINIMUM 3" RIGID GALVANIZED STEEL INSTALLED AT MINIMUM DEPTH OF 30" UNLESS NOTED OTHER ON PLANS.
7. CONCRETE SIDEWALK DISTURBED DURING CONSTRUCTION SHALL BE REMOVED AND REPLACED IN ACCORDANCE WITH THE CITY OF ANAHEIM STANDARD DETAIL NO. 110-B, 112-1 AND 113-1.
8. TRAFFIC SIGNALS SHALL REMAIN IN OPERATION AT ALL TIMES. CONTRACTOR SHALL PROVIDE TEMPORARY SIGNALS, CONTROLLER, WIRING, POSTS/POLES, ETC. AS REQUIRED DURING THE PROGRESS OF WORK. CONTRACTOR IS RESPONSIBLE FOR COST OF MAINTAINING SIGNAL OPERATION AND SHALL INCLUDE IN HIS/HER BID. NO FURTHER COMPENSATION SHALL BE ALLOWED.
9. THE CONTRACTOR SHALL MAINTAIN THE EXISTING TRAFFIC SIGNAL WITHIN THE PROJECT LIMITS, CARE SHALL BE TAKEN TO AVOID DAMAGING THE EXISTING TRAFFIC SIGNAL SYSTEM. IF THE TRAFFIC SIGNAL SYSTEM IS DAMAGED DURING CONSTRUCTION, THE CONTRACTOR SHALL REPAIR THE SIGNAL SYSTEM AS DIRECTED BY THE ENGINEER AT NO COST TO THE CITY OF ANAHEIM.
10. POLE LOCATIONS SHOWN ARE PRELIMINARY. CONTRACTOR SHALL OBTAIN ENGINEER'S APPROVAL FOR FINAL TRAFFIC SIGNAL POLE LOCATIONS PRIOR TO EXCAVATING FOUNDATIONS.
11. BACKFILL AND CAPPING METHODS FOR POT HOLES, BORE PITS, PILOT HOLES, AND TRENCH EXCAVATIONS SHALL CONFORM TO ANAHEIM STANDARD DETAIL NO. 132.
12. CONTRACTOR SHALL FURNISH AND INSTALL CONDUCTORS AND CABLES TO PROVIDE THE INTENDED SIGNAL OPERATION INCLUDING LOOP DETECTOR CABLES AND INTERCONNECT CABLES.
13. LOOP DETECTORS SHALL BE TYPE "E", PER CALTRANS STD, ES-1C AND INSTALLED PER CITY STD. DETAIL NO. 410 AND AS MODIFIED BY PLANS.
14. ALL SALVAGED EQUIPMENT SHALL BECOME PROPERTY OF CITY UNLESS OTHERWISE DIRECTED BY THE ENGINEER.
15. ALL NEW VEHICLE INDICATIONS SHALL BE 12" LED INDICATIONS WITH LOUVERED BACK PLATES IN ACCORDANCE WITH THE SPECIFICATIONS AND SPECIAL PROVISIONS.
16. ALL NEW PEDESTRIAN INDICATIONS SHALL BE LED FILLED COMBINATION UP-RAISED HAND/WALKING MAN COUNTDOWN DISPLAY IN ACCORDANCE WITH THE SPECIFICATIONS AND SPECIAL PROVISIONS.
17. ALL NEW PEDESTRIAN PUSH BUTTONS SHALL BE APS COMPLIANT EQUIPMENT IN ACCORDANCE WITH SPECIFICATIONS AND SPECIAL PROVISIONS.
18. ALL UNUSED SIGNAL POLE FOUNDATIONS SHALL BE REMOVED COMPLETELY UNLESS OTHERWISE APPROVED BY THE CONSTRUCTION SERVICES MANAGER.
19. FIBER OPTIC CABLE BENDING RADIUS SHALL NOT EXCEED MANUFACTURER'S RECOMMENDATIONS; FIBER OPTIC CABLES SHALL BE PULLED STRAIGHT FROM THE CONDUIT WITHOUT TOUCHING THE SIDES OF THE PULL BOX 45°, COUPLING SHALL BE USED WHERE NECESSARY.
20. THE ENGINEER SHALL APPROVE NEW FIBER OPTIC CABLE PRIOR TO INSTALLATION, OTDR READINGS SHALL BE SUBMITTED AS REQUIRED BY THE ENGINEER AND SPECIAL PROVISIONS.
21. NEW FIBER OPTIC CONDUIT SHALL ENTER PULL BOXES WITH A CONDUIT SWEEP NOT EXCEEDING 45°, MINIMUM DEPTH SHALL BE 30".

UTILITY NOTES

1. THE EXISTENCE AND LOCATION OF UNDERGROUND UTILITY LINES OR STRUCTURES SHOWN ON THIS PLAN WAS OBTAINED BY A SEARCH OF AVAILABLE RECORDS. THESE LOCATIONS ARE APPROXIMATE AND SHALL BE CONFIRMED IN THE FIELD BY THE CONTRACTOR SO THAT ANY NECESSARY ADJUSTMENT CAN BE MADE TO THE PROPOSED IMPROVEMENTS. THE CONTRACTOR SHALL NOTIFY ALL UTILITY COMPANIES AND AGENCIES AFFECTED PRIOR TO BEGINNING CONSTRUCTION IN THE VICINITY OF THEIR RESPECTIVE FACILITIES.
2. THE CONTRACTOR SHALL CALL IN A LOCATION REQUEST TO THE UNDERGROUND SERVICE ALERT (U.S.A.) AT 1-800-422-4133 TWO WORKING DAYS BEFORE DIGGING. NO INSPECTION WILL BE PROVIDED BY THE CITY ENGINEER'S OFFICE UNLESS THE APPLICANT HAS BEEN PROVIDED AN INQUIRY IDENTIFICATION NUMBER BY U.S.A.
3. ALL EXISTING PUBLIC WATER FACILITIES, INCLUDING FIRE HYDRANTS AND VALVES, ARE TO BE PROTECTED IN PLACE. THE CONTRACTOR PERFORMING THIS WORK IS RESPONSIBLE FOR ALL COSTS AS A RESULT OF ANY DAMAGE OR REPAIRS REQUIRED TO WATER FACILITIES. SMALL (2" AND SMALLER) ARE NOT SHOWN ON PLANS, BUT MUST BE PROTECTED IN PLACE. NORMAL COVER IS 30". IN CASE OF EMERGENCY, CONTACT UTILITY OPERATIONS AT 714-765-4560 OR WATER ENGINEERING AT 714-765-5196.
4. ANY CROSSINGS OF PUBLIC WATER MAINS MUST HAVE A MINIMUM OF 1' CLEARANCE. IF A WATER MAIN IS EXPOSED, CALL 714-765-4591 FOR INSPECTION TO VERIFY CLEARANCE PRIOR TO BACKFILLING.
5. UNLESS OTHERWISE APPROVED, THE FOLLOWING CLEARANCES SHALL BE MAINTAINED BETWEEN EXISTING WATER FACILITIES AND ANY OTHER PROPOSED IMPROVEMENTS:
   5a. A MINIMUM SEPARATION OF 12-INCHES FOR VERTICAL CROSSINGS.
   5b. A MINIMUM SEPARATION OF 5-FEET FOR HORIZONTAL/PARALLEL INSTALLATIONS, EXCEPT FOR SANITARY SEWERS WHICH REQUIRE A MINIMUM HORIZONTAL SEPARATION OF 10-FEET.
   5c. A MINIMUM OF 2-FEET AROUND ANY ABOVE GROUND WATER FACILITY/APPURTENANCE.

UTILITY AGENCIES

APU-E	ANAHEIM PUBLIC UTILITIES-ELECTRIC
APU-W	ANAHEIM PUBLIC UTILITIES-WATER
AT&T	AMERICAN TELEPHONE & TELEGRAM
COA	CITY OF ANAHEIM
MWD	METROPOLITAN WATER DISTRICT
OCTA	ORANGE COUNTY TRANSPORTATION AUTHORITY
SCG	SO. CALIFORNIA GAS COMPANY
SCE	SO. CALIFORNIA EDISON
SPEC	SPECTRUM
SCRRA	SO. CALIFORNIA REGIONAL RAIL AUTHORITY
VZN(MCI)	VERIZON (MCI, INC.)

REVISIONS

NO.	DATE	DESCRIPTION	ENGR.	APPROV.
1	10/20/23	UPDATED CONDUCTOR	ML	ML
		SCHEDULE, ADJUSTED		
		CALLOUTS, AND ADDED		
		PULL-BOX.		

REFERENCES

FOR NOTES TO CONTRACTOR SEE PLAN: 38718-38719
FOR STANDARD DETAILS SEE: COA 110-B, 111, 114-A, 115-B, 120, 121-A, 122, 140-2, 143, 150, 205, 313, 324, 350-B, 385, 426, 452, 453, 454, 456, 457, 459, 477, 623, W-101, W-102, W-110, W-152, W-207, W-220, W-229,
SPPWC 111-3, 122-2, 150-2, 300-3, 380-4, OCTA FIGURE 23, CT 22, 451
STREET PLAN NO's: 38721-38728 | STRIPING PLAN NO's: 38736-38737
DIST. MAP NO. 93, 103 | BENCH MARK NO. 4A-37 | ELEV. 177.22'(NAVD88)
BASIS OF BEARING: CENTERLINE OF LINCOLN AVE BEING N75°31'34"E

PREPARED BY:
ARDURRA
3737 BIRCH STREET, SUITE 250
NEWPORT BEACH, CA 92660
P: 949.428.1500 F: 949.258.5053

SCALE: 1"=20' | DESIGNED BY: M.G. | REVIEWED BY: M.L.
PLANS PREPARED UNDER THE SUPERVISION OF:
REGISTERED PROFESSIONAL ENGINEER — MARK B. LOVE — NO. 1637 — TRAFFIC — STATE OF CALIFORNIA
PROJECT ENGINEER
TR 1637 — R.T.E. No. — 09/30/2024 — EXPIRATION DATE — 10/20/2023 — DATE

CITY OF ANAHEIM
DEPARTMENT OF PUBLIC WORKS
200 SOUTH ANAHEIM BLVD. #276
ANAHEIM, CA 92805
(714) 765-5176
www.anaheim.net

TRAFFIC SIGNAL MODIFICATION PLAN
LINCOLN AVENUE
AT EAST STREET

RCP 2017-12892

CITY OF ANAHEIM
DEPARTMENT OF PUBLIC WORKS

SHEET 21 OF 55
PLAN NUMBER #####

P:\2022 Projects\22059-01 Anaheim_CA_Lincoln Ave Widening\CAD\Plan Set\Dt. Traffic\Signal\07-TRFC1.dwg 10/23/2023 15:31

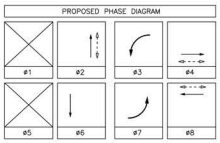
LINCOLN AVE. - EAST ST. TO EVERGREEN AVE.

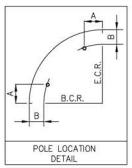
POLE SCHEDULE

	STANDARD		MAST ARM		LED LUMINAIRE	LED S.N.S. LEGEND	SIGNAL MTGS			PED PUSH BTN		LOCATION		REMARKS
No.	TYPE	HEIGHT	SIGNAL	LUM			VEHICLE		PED	PHASE	ARW	A	B	
(1)	29-5-100	30'	45'	15'	136W	La Plaza	3-MAS	SV-1-T	SP-1-T	ø8	LT	6'	5.7'	8 11
(2)	1-A	10'	---	---	---	---	---	TV-1-T	---			1.6'	4.3'	⚠
(3)	17-2-100	30'	20'	12'	136W	Lincoln Ave	MAS	SV-1-T	SP-1-T	ø2	LT	4'	6.2'	8
(4)	15-TS	30'	---	15'	136W	---	---	SV-1-T	SP-1-T	ø8	RT	2.2'	3.7'	
(5)	29-5-100	30'	45'	15'	136W	La Plaza	3-MAS	SV-2-TA	SP-1-T	ø2	LT	9.5'	3.3'	8
(6)	1-A	10'	---	---	---	---	---	TV-1-T	---			3.2'	3.2'	
(7)	19-2-100	30'	20'	12'&15'	136W	Lincoln Ave	MAS	SV-2-TA	---			0'	5.3'	8

ALL EQUIPMENT SHALL BE NEW.
ALL NEW IISNS SHALL BE PERIMETER LIT LED WITH CITY SEAL FACE PANEL IN ACCORDANCE WITH THE SPECIFICATIONS.
ALL NEW SAFETY LIGHTING SHALL BE LED TYPE IN ACCORDANCE WITH THE SPECIFICATIONS AND UTILITIES T&D CONSTRUCTION STANDARD L-119.
CONTRACTOR TO SUBMIT DOCUMENTATION APPROVAL PER UTILITIES REQUIREMENTS.
ALL NEW PPB SHALL BE APS COMPLIANT WITH AUDIBLE SPEECH AND VIBROTACTILE ARROW FEATURE ACTIVE IN ACCORDANCE WITH THE SPECIFICATIONS AND SPECIAL PROVISIONS.
SIGNAL WORK SHALL BE COMPLETED BEFORE BEGINNING THE ASPHALT WORK ALONG LINCOLN AVENUE.

PROPOSED PHASE DIAGRAM

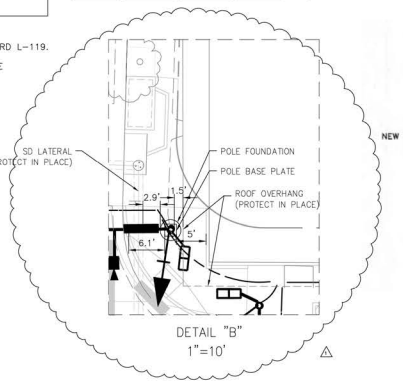




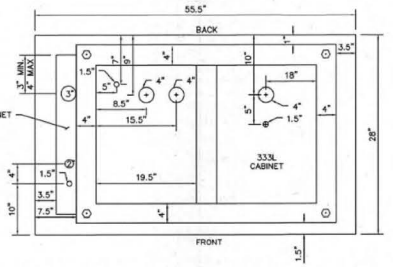
POLE LOCATION DETAIL

FOR SIGNAL AND LIGHTING GENERAL NOTES, REFER TO SHEET 21.

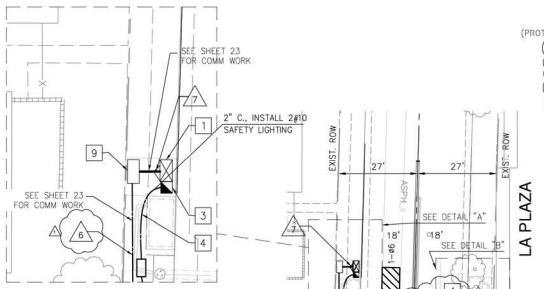
FOR UTILITY NOTES, REFER TO SHEET 21.



DETAIL "B"
1"=10'



DETAIL-B
CABINET FOUNDATION DETAIL
(N.T.S)



DETAIL "A"
1"=10'

CONSTRUCTION NOTES (THIS SHEET)

1. FURNISH AND INSTALL NEW P-PLUS CABINET (TS2) ON NEW 12" FOUNDATION. INSTALL NEW 2070L CONTROLLER EQUIPPED WITH 2070-1C MODULE WITH EOS SOFTWARE PRE-INSTALLED, AND 2N I/O MODULE FOR 2070 CONTROLLER UNIT. NEW P-PLUS CABINET SHALL BE EQUIPPED WITH APS SYSTEM, IP-BASED SAFETY MONITOR UNIT, FIBER OPTIC DISTRIBUTION UNIT, FIBER OPTIC ETHERNET SWITCH, GPS EMERGENCY VEHICLE PRE-EMPTION UNIT. THIS SHALL INCLUDE ALL NECESSARY ACCESSORIES AND APPURTENANCES TO PROVIDE THE INTENDED OPERATION. REFER TO DETAIL-B FOR TRAFFIC SIGNAL FOUNDATION.
3. FURNISH AND INSTALL TYPE II-B 120/240V SERVICE ENCLOSURE WITH 100 AMP MAIN CIRCUIT BREAKER; 50 AMP CIRCUIT BREAKER FOR TRAFFIC SIGNAL (METERED); 15 AMP (METERED) CIRCUIT BREAKER FOR ISNS; AND 30 AMP CIRCUIT BREAKER FOR SAFETY LIGHTING (UNMETERED). CONTRACTOR SHALL FURNISH AND INSTALL ALL APPURTENANCES TO PROVIDE THE THE INTENDED OPERATION.
4. INSTALL 1-3" GRAY RIGID STEEL SERVICE CONDUIT WITH 3-1/0 CU XHHW-2 CONDUCTORS, 36" MIN. DEEP, FROM METER TO NEW PULL BOX. ALL BENDS MIN. 36" RADIUS PER CU1600-25. CONTACT UTILITY INSPECTION SUPERVISOR (714) 765-6843 TO COORDINATE SERVICE. NOTIFY CITY 3 WEEKS PRIOR TO CONSTRUCTION. REPLACE EXISTING PULL BOX WITH 17"X30" NEW PULL BOX WITH LID MARKED "ELECTRIC" PER CU-1500-1B. EXTEND NEW 3"C & CONNECT TO EX. SERVICE POINT. COORDINATE WITH CITY FOR SERVICE POINT LOCATION AND CONNECTION TO NEW METER.
5. INSTALL TYPE "E" 6' LOOP DETECTOR AS SHOWN.
8. FURNISH AND INSTALL VIDEO DETECTION SYSTEM WITH COMMUNICATION MANAGER IN CONTROLLER CABINET PER SPECIAL PROVISIONS AND MANUFACTURERS DIRECTIONS. VIDEO DETECTION CAMERA CABLES SHALL MEET MANUFACTURER'S REQUIREMENTS. ALL VIDEO DETECTION ZONES SHALL BE APPROVED BY THE CITY TRAFFIC SIGNAL MAINTENANCE REPRESENTATIVE.
9. INSTALL NEW 24"x36"x24" PULL BOX.
10. REMOVE AND SALVAGE EXISTING TYPE II SERVICE, SIGNAL POLES, CABINET AND CONTROLLER. DISPOSE ALL REMAINING TRAFFIC SIGNAL EQUIPMENT. SIGNAL TO BE REMAINED IN OPERATION UNTIL NEW LA PLAZA SIGNAL IS ACTIVATED.
11. INSTALL GPS EMERGENCY PREEMPTION RECEIVER ON SIGNAL POLE FOR INTENDED OPERATION PER STANDARD SPECIFICATION AND SPECIAL PROVISIONS.

CONDUCTOR SCHEDULE

AWG	CIRCUIT	RUN NO. 1	2	3	4	5	6	7
#14	Ø2	–	–	–	–	3	3	3
	Ø3	3	3	–	–	–	3	3
	Ø4	–	–	3	3	3	3	3
	Ø6	3	3	3	3	3	3	3
	Ø7	–	–	3	3	3	3	3
	Ø8	–	3	–	–	–	3	3
	Ø2P	–	–	2	2	4	4	4
	Ø4P	2	2	2	2	2	4	4
	Ø8P	–	2	–	2	2	4	4
	Ø2 APS PPB	–	–	2	2	4	4	4
	Ø4 APS PPB	2	2	2	2	2	4	4
	Ø8 APS PPB	–	2	–	2	2	4	4
	PB COMMON	1	1	1	1	1	2	2
	SPARES	3	3	3	3	3	6	6
	TOTAL	14	21	21	25	32	46	46
#10	IISNS	2	2	2	2	2	4	
	SIGNAL COMMON	1	1	1	1	1	2	2
	LUMINAIRE	2	2	2	2	2	4	
	TOTAL	5	5	5	5	5	10	2
DLC (TYPE C)	Ø3	–	–	–	–	–	–	–
	Ø4	3	3	–	–	–	3	3
	Ø7	–	–	–	–	–	–	–
	Ø8	–	–	–	3	3	3	3
	TOTAL	3	3	–	3	3	6	6
#6	SIGNAL SERVICE	–	–	–	–	–	–	–
48SMFO	DISTRIBUTION CABLE PER FIBER OPTIC COMMUNICATION PLAN	–	–	1	1	1	1	1
VIDEO CABLE		1	2	1	1	2	4	4
5PR #20	EVP						1	1
CONDUIT SIZE		3"	3"	2–3"	2–3"	2–3"	2–4"	2–4"

ALL CONDUITS AND CONDUCTORS SHALL BE NEW

CONDUCTOR SCHEDULE IS FURNISHED AS AN INSTALLATION GUIDE ONLY. IT SHALL BE THE CONTRACTORS RESPONSIBILITY TO PROVIDE THE CORRECT CONDUCTORS REQUIRED FOR THE INTENDED OPERATIONS.

UTILITY AGENCIES

APU-E	ANAHEIM PUBLIC UTILITIES-ELECTRIC
APU-W	ANAHEIM PUBLIC UTILITIES-WATER
AT&T	AMERICAN TELEPHONE & TELEGRAM
COA	CITY OF ANAHEIM
MWD	METROPOLITAN WATER DISTRICT
OCTA	ORANGE COUNTY TRANSPORTATION AUTHORITY
SCG	SO. CALIFORNIA GAS COMPANY
SCE	SO. CALIFORNIA EDISON
SPEC	SPECTRUM
SCRRA	SO. CALIFORNIA REGIONAL RAIL AUTHORITY
VZN(MCI)	VERIZON (MCI, INC.)

CALTRANS STD. NOTES

- AB ABANDON. IF APPLIED TO CONDUIT, REMOVE CONDUCTORS.
- BC INSTALL PULL BOX IN EXISTING CONDUIT RUN.
- CB INSTALL CONDUIT INTO NEW PULL BOX.
- RC EQUIPMENT OR MATERIAL TO BE REMOVED AND BECOME THE PROPERTY OF THE CONTRACTOR.
- RS REMOVE AND SALVAGE EQUIPMENT.

UNDERGROUND SERVICE ALERT
CALL: 811
TWO WORKING DAYS BEFORE YOU DIG

REVISIONS				
NO.	DATE	DESCRIPTION	ENGR.	APPROV.
1	10/31/23	ADDED AND UPDATED CALLOUTS.	ML	ML

REFERENCES

FOR NOTES TO CONTRACTOR SEE PLAN: 38718-38719
FOR STANDARD DETAILS SEE: COA 110-B, 111, 114-A, 115-B, 120, 121-A, 122, 140-2, 143, 150, 205, 313, 324, 350-B, 385, 426, 452, 453, 454, 456, 457, 459, 477, 623, W-101, W-102, W-110, W-152, W-207, W-220, W-229, SPPWC 111-3, 122-2, 150-2, 300-3, 380-4, OCTA FIGURE 23, CT 22, 451
STREET PLAN NO's: 38721-38728 | STRIPING PLAN NO's: 38736-38737
DIST. MAP NO. 93, 103 | BENCH MARK NO. 4A-37 | ELEV: 177.22'(NAVD88)
BASIS OF BEARING: CENTERLINE OF LINCOLN AVE BEING N79°31'34"E

PREPARED BY:
ARDURRA
3737 BIRCH STREET, SUITE 250
NEWPORT BEACH, CA 92660
P: 949.428.1500 F: 949.258.5053

SCALE: 1"=20' | DESIGNED BY: M.G. | REVIEWED BY: M.L.

PLANS PREPARED UNDER THE SUPERVISION OF:

REGISTERED PROFESSIONAL ENGINEER MARK B. LEVIS NO. 1637 TRAFFIC STATE OF CALIFORNIA

PROJECT ENGINEER
TR 1637 | 09/30/2024 | 10/20/2023
R.T.E. No. | EXPIRATION DATE | DATE

CITY OF ANAHEIM
DEPARTMENT OF PUBLIC WORKS
200 SOUTH ANAHEIM BLVD. #276
ANAHEIM, CA 92805
(714) 765-5176
www.anaheim.net

TRAFFIC SIGNAL INSTALLATION PLAN
LINCOLN AVENUE
AT LA PLAZA

RCP 2017-12892

CITY OF ANAHEIM
DEPARTMENT OF PUBLIC WORKS

SHEET 22 OF 55
PLAN NUMBER 38739

© 2022 Projects\23059-01 Anaheim_CA_Lincoln Ave Widening\CAD\Plan Set\LB_Traffic Signal\LI7 - RPH.dwg 10/31/2023 17:47

CITY OF ANAHEIM

STREET IMPROVEMENT PLANS FOR THE CONSTRUCTION OF

ORANGEWOOD AVENUE

FROM STATE COLLEGE BOULEVARD TO SANTA ANA RIVER

Account No: 828-412-K939-7892

ORANGEWOOD WIDENING - STATE COLLEGE TO SANTA ANA RIVER

GENERAL NOTES

1. ALL WORK AS SHOWN ON THESE PLANS SHALL BE IN ACCORDANCE WITH THE APPLICABLE SECTIONS OF STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION, 2012 EDITION, CITY OF ANAHEIM STANDARD DETAILS AND STANDARD SPECIFICATION SUPPLEMENT AND CALTRANS STANDARD PLANS & SPECIFICATIONS.
2. ALL NECESSARY UTILITY CONSTRUCTION WITHIN THE STREET RIGHT-OF-WAY SHALL BE COMPLETED PRIOR TO PAVING.
3. THE CONTRACTOR SHALL NOTIFY THE FOLLOWING AGENCIES AT LEAST 48 HOURS PRIOR TO BEGINNING OF CONSTRUCTION:
   (I) UNDERGROUND SERVICE ALERT (800) 422-4133
   (II) SOUTHERN CALIFORNIA GAS COMPANY HEADQUARTERS PLANNING OFFICE (714) 634-3235
   (III) CONSTRUCTION SERVICES DIVISION – CITY OF ANAHEIM (714) 765-5176
   (IV) METROPOLITAN WATER DISTRICT – MR. RICK BICKER (714) 577-5084
4. ALL DIMENSIONS AND ELEVATIONS ARE SHOWN IN ENGLISH UNITS.
5. ALL WORK WITHIN THE RIGHT-OF-WAY WILL REQUIRE A RIGHT-OF-WAY EXCAVATION & CONSTRUCTION PERMIT.
6. THE LOCATION OF ALL VAULTS, VENT PIPES, METER BOXES, STREET LIGHTS, PULLBOXES, ETC. WITHIN THE PROPOSED PARKWAYS SHALL BE SHOWN ON STREETSCAPE PLANS.
7. ALL PAVING REMOVAL SHALL BE SAWCUT AT THE FIELD ENGINEER'S DIRECTION. MINIMUM DEPTH OF CUT: 0.12'.
8. PAVING SHALL BE SAWCUT AND REMOVED A MINIMUM OF 1' FROM CURB AND GUTTER CONSTRUCTION OR RECONSTRUCTION.
9. THE PROTECTION AND ADJUSTMENT OF ALL UTILITIES SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR, UNLESS NOTED OTHERWISE ON THE PLANS.
10. IT SHALL BE THE CONTRACTOR'S RESPONSIBILITY TO PROTECT AND/OR RELOCATE ALL TRAFFIC SIGNS AND TRAFFIC SIGNALS AS SHOWN ON THE PLANS OR AS REQUIRED BY THE FIELD ENGINEER.
11. REPORTS OF COMPACTION WITHIN THE RIGHT-OF-WAY SHALL BE SUBMITTED TO AND ACCEPTED BY THE FIELD ENGINEER PRIOR TO PLACING ANY PAVING.
12. PRIOR TO CONSTRUCTION, ALL SURVEY MONUMENTS THAT MAY BE DISTURBED SHALL BE TIED OUT AND A CORNER RECORD OF EACH MONUMENT SHALL BE SUBMITTED TO THE CITY SURVEYOR FOR APPROVAL, PRIOR TO BEING FILED WITH THE COUNTY SURVEYOR. FOLLOWING CONSTRUCTION ALL SURVEY MONUMENTS THAT WERE DISTURBED SHALL BE RESET IN THEIR ORIGINAL POSITIONS AND A CORNER RECORD OF EACH MONUMENT SHALL BE SUBMITTED TO THE CITY SURVEYOR FOR APPROVAL, PRIOR TO BEING FILED WITH THE COUNTY SURVEYOR. PURSUANT TO THE PROFESSIONAL LAND SURVEYORS ACT SECTION 8771(d).
13. ALL WORK IN THE COUNTY R/W SHALL CONFORM TO THE PERMIT STANDARDS AND SPECIAL PROVISIONS, THE "GREENBOOK" STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION, 2018 EDITION.
14. APWA STANDARD PLAN 320-2, 321-2 AND 322-2 FOR STORM DRAIN MANHOLES SHALL BE AMENDED SUCH THAT THE MANHOLE FRAME AND COVER REFERENCED IS CHANGE TO CITY OF ANAHEIM STANDARD PLAN NO. 630-3.
15. TRAFFIC SIGNALS SHALL REMAIN IN OPERATION AT ALL TIMES. CONTRACTOR SHALL PROVIDE TEMPORARY SIGNALS, CONTROLLER, WIRING, POSTS/POLES, ETC. AS REQUIRED DURING THE PROGRESS OF WORK. CONTRACTOR IS RESPONSIBLE FOR COST OF MAINTAINING SIGNAL OPERATION AND SHALL BE INCLUDED IN HIS/HER BID, NO FURTHER COMPENSATION SHALL BE ALLOWED.

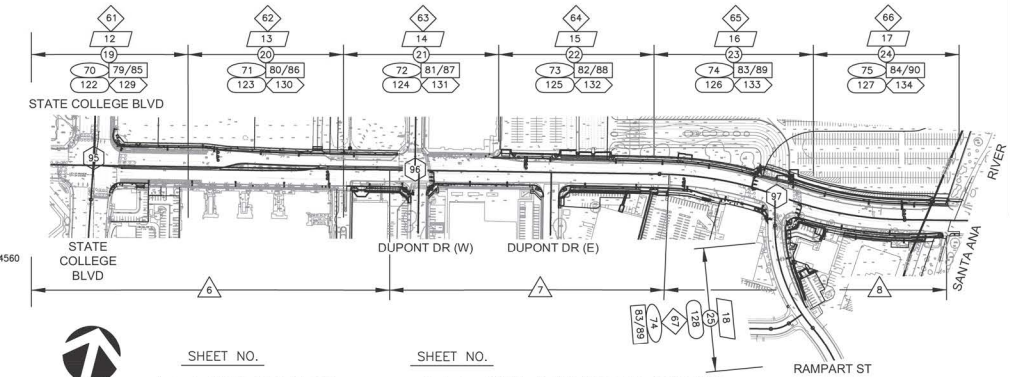
CITY OF ANAHEIM WATER NOTES

1. IN CASE OF AN EMERGENCY, THE CONTRACTOR SHALL IMMEDIATELY CONTACT WATER FIELD/OPERATIONS AT (714) 765-4560 AND WATER ENGINEERING AT (714) 765-5196.
2. ALL EXISTING PUBLIC WATER FACILITIES SHALL BE PROTECTED IN PLACE. THE CONTRACTOR PERFORMING THIS WORK SHALL BE RESPONSIBLE FOR ALL COSTS AS A RESULT OF ANY DAMAGE OR REPAIRS TO EXISTING WATER FACILITIES.
3. SMALL WATER SERVICE LATERALS (i.e. 2" AND SMALLER) ARE TYPICALLY NOT SHOWN ON THE PLANS, BUT MUST BE PROTECTED IN PLACE. THE NORMAL DEPTH OF COVER FOR WATER SERVICE LATERALS IS 30".
4. CONTRACTOR SHALL POTHOLE ALL UTILITY CROSSINGS PRIOR TO CONSTRUCTION.
5. FOR STREET WIDENING PROJECTS, WATER ENGINEERING WILL NOT APPROVE ANY PROPOSED DOMESTIC, IRRIGATION, OR FIRE LINE SERVICE INSTALLATIONS UNTIL THE OWNER, DEVELOPER, OR CONTRACTOR COMPLETES A WATER SERVICE METER APPLICATION AND PAYS ALL APPLICABLE DEVELOPMENT RELATED FEES. CONTACT WATER ENGINEERING AT (714) 765-5196 TO PROCESS THE METER APPLICATION.
6. UNLESS OTHERWISE APPROVED, THE FOLLOWING CLEARANCES SHALL BE MAINTAINED BETWEEN EXISTING WATER FACILITIES AND ANY OTHER PROPOSED IMPROVEMENTS:
   - A MINIMUM SEPARATION OF 12-INCHES FOR VERTICAL CROSSINGS
   - A MINIMUM SEPARATION OF 5-FEET FOR HORIZONTAL/PARALLEL INSTALLATIONS, EXCEPT FOR SANITARY SEWERS WHICH REQUIRE A MINIMUM HORIZONTAL SEPARATION OF 10-FEET.
   - A MINIMUM OF 2-FEET AROUND ANY ABOVE-GROUND WATER FACILITY/APPURTENANCE.
7. CONTRACTOR SHALL CONTACT CITY OF ANAHEIM WATER INSPECTION AT (714) 765-4591 PRIOR TO BEGINNING WORK. ALL EXCAVATION AROUND EXISTING PUBLIC WATER FACILITIES SHALL BE OBSERVED BY CITY WATER INSPECTOR.
8. IF PAVING IS PERFORMED AND VALVES GET COVERED, WATER VALVES SHALL BE EXPOSED AND ADJUSTED TO GRADE PER WATER STD. W-152.

UTILITY CONTACT LIST

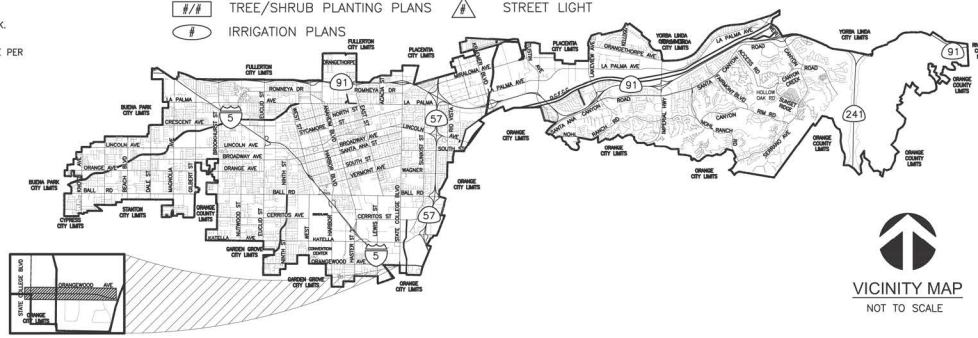
UTILITY	CONTACT	PHONE
CITY OF ANAHEIM WATER ENGINEERING DIVISION	DAVID KIM	714-765-4206
CITY OF ANAHEIM WATER INSPECTION	STEWART NOBLE	714-765-4591
SOUTHERN CALIFORNIA GAS COMPANY	ADALBERTO RODRIGUEZ	714-634-5069
CITY OF ANAHEIM ELECTRIC ENGINEERING DIVISION	STEVEN CHAGOLLA	714-765-4094
METROPOLITAN WATER DISTRICT	KEIRAN CALLANAN	213-217-7474
AT&T	MICHAEL DALADAD	714-618-9113
TIME WARNER/ CHARTER COMMUNICATIONS	TIMOTHY HAYDOCK	951-751-4615
OCTA	KYLE POFF	714-560-5816
CALTRANS DISTRICT 12	SHAWN ROMOUZI	949-724-2080
CITY OF ORANGE WATER	RYAN VISPERAS	714-288-2487
ORANGE COUNTY WATER DISTRICT	CHRIS OLSEN	714-378-3232
ORANGE COUNTY SANITATION DISTRICT	DANIEL LEE	714-593-7176
VERIZON/MCI/XO	MATT BERGINE	949-417-7841

DIGALERT — DIAL TOLL FREE 811 OR 1-800-422-4133 — NOTICE TWO DAYS BEFORE YOU DIG — UNDERGROUND SERVICE ALERT OF SOUTHERN CALIFORNIA



LOCATION MAP
NOT TO SCALE

SHEET NO.		SHEET NO.	
#	DEMOLITION PLANS	#	WATER PLANS (ANAHEIM DOMESTIC)
#	STREET PLANS	#	WATER PLANS (ORANGE DOMESTIC)
#	UTILITY PLANS	#	TRAFFIC SIGNAL
#/#	TREE/SHRUB PLANTING PLANS	#	STREET LIGHT
#	IRRIGATION PLANS		



PROJECT LOCATION

VICINITY MAP
NOT TO SCALE

SHEET INDEX

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MCI WORLDCOM/ XO COMMUNICATIONS FIBER OPTIC CABLE ROUTE	1 – 4	
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SECONDARY FED UNDERGROUND COMMERCIAL SERVICE	1 – 2	PROJ. NO. 2100000025
RELOCATE R-1268 & AUTOMATION CABINETS	1	PROJ. NO. P2200000010
BUILDING PERMIT/PLANS BLD2019-00517, 2400 E. ORANGEWOOD AVE.		EXHIBIT A
SIGN PERMIT/PLANS SGN2020-00067, 2400 E. ORANGEWOOD AVE.		EXHIBIT B
SIGN PERMIT/PLANS SGN2019-00039, 2300 E. ORANGEWOOD AVE.		EXHIBIT C

CONVENTIONAL SYMBOLS FOR EXISTING TOPOGRAPHY

—C—	COMMUNICATION	F/H	FIRE HYDRANT
—E—	ELECTRICAL	PP	POWER POLE
—G—	GAS	PB	PULL BOX
—S—	SEWER	SMH	SEWER MANHOLE
SD	STORM DRAIN	SDMH	STORM DRAIN MANHOLE
—T—	TELEPHONE		STREET LIGHT
—W—	WATER		STREET SIGN
— — —	CENTERLINE	WM	WATER METER
		WV	WATER VALVE

ABBREVIATIONS

AB	AGGREGATE BASE	PCC	PORTLAND CEMENT CONCRETE; POINT
AC	ASPHALT CONCRETE	PC	OF COMPOUND CURVE
AVE	AVENUE	PRC	POINT OF REVERSE CURVE
BW	BACK OF WALL	PROP	PROPOSED
BC	BEGIN CURVE	RCB	REINFORCED CONCRETE BOX
BLVD	BOULEVARD	RPM	REFLECTIVE PAVEMENT MARKER
CB	CATCH BASIN	RT	RIGHT
C&G	CURB & GUTTER	R/W	RIGHT OF WAY
CF	CURB FACE	S'LY	SOUTHERLY
CL	CENTER LINE	SCE	SOUTHERN CALIFORNIA EDISON
CLR	CLEAR	SCG	SOUTHERN CALIFORNIA GAS
COA	CITY OF ANAHEIM	SD	STORM DRAIN
COO	CITY OF ORANGE	SPPWC	STANDARD PLANS FOR PUBLIC
CONST	CONSTRUCTION		WORKS CONSTRUCTION
CONT	CONTINUOUS	SS	SANITARY SEWER
DIA	DIAMETER	ST	STREET
EC	END CURVE	STD	STANDARD
EP	EDGE OF PAVEMENT	TC	TOP OF CURB
EXIST; EX	EXISTING	TYP	TYPICAL
E'LY	EASTERLY	W'LY	WESTERLY
FH	FIRE HYDRANT		
FL	FLOW LINE		
FS	FINISH SURFACE		
LOC	LENGTH OF CURVE		
LOL	LAYOUT LINE; LENGTH OF LINE		
LP	LOW POINT		
LT	LEFT		
MAX	MAXIMUM		
MH	MANHOLE		
N'LY	NORTHERLY		
NO	NUMBER		
OCSD	ORANGE COUNTY SANITATION DISTRICT		

APPROVALS

Ayumi Takayasu — OPERATIONS MANAGER	11/24/2021 DATE
CITY TRAFFIC ENGINEER	11/22/2021 DATE
David K. Moi — ENGINEERING MANAGER	11/24/2021 DATE
CITY ENGINEER	11/24/2021 DATE

OCFCD PERMIT # : FE20-0073 & FE20-0304

RCP2020-17013

PREPARED BY:
Kreuzer Consulting Group
320 MAIN STREET
UNIT D
SEAL BEACH, CA 90740
714-656-0160

REVISIONS

NO.	DATE	DESCRIPTION	ENGR.	APPROV.

REFERENCES

FOR APPROVALS AND NOTES TO CONTRACTOR SEE PLAN 38215

FOR STANDARD DETAILS SEE: COA: 110-B, 111-3, 115-B, 120, 121-A, 140-3, 142-A, 143, 150-2, 151-1, W-152, 600-2, 601-4, 623 SPPWC: 604-4, 606-4

STREET PLAN NO's: 38233 – 38239 | STRIPING PLAN NO's: 38306 – 38308

DIST. MAP NO. 118, 119 | BENCH MARK NO. 10A-15 | ELEVATION: 144.00

BASIS OF BEARING: THE CA. COORDINATE SYSTEM, ZONE 6,NAD 83 EPOCH 2007.00 DETERMINED LOCALLY BY A LINE BETWEEN FOUND OCPW GPS POINT 3093 AT THE INTERSECTION OF ORANGEWOOD AVE AND DUPOINT DR AND FOUND OCPW GPS POINT 3102 AT THE INTERSECTION OF ORANGEWOOD AVE AND RAMPART ST BEING N85°51'16"W AS DERIVED FROM GEODETIC VALUES PUBLISHED BY ORANGE COUNTY PUBLIC WORKS

SCALE: NTS | DESIGNED BY: DSJ | REVIEWED BY: RK

REGISTERED PROFESSIONAL ENGINEER — RICK KREUZER — No. 42407 — Exp. 3-31-22 — CIVIL — STATE OF CALIFORNIA

PLAN PREPARED BY:

R.A. Kreuzer — PRINCIPAL ENGINEER

#42407 — R.C.E. No. — 08/16/2021 — DATE

CITY OF ANAHEIM CALIFORNIA — FOUNDED 1857

CITY OF ANAHEIM
DEPARTMENT OF PUBLIC WORKS
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STREET IMPROVEMENT
ORANGEWOOD AVENUE
FROM STATE COLLEGE BOULEVARD TO SANTA ANA RIVER
TITLE SHEET

CITY OF ANAHEIM
DEPARTMENT OF PUBLIC WORKS

ACCOUNT NUMBER
828-412-K939-7892

SHEET 1 OF 134

PLAN NUMBER 38215

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22.30 Response to Submission 013859 (David Kennedy, City of Anaheim, Feb 3, 2026)

22.30.1 2422

Refer to Standard Response LAA-Response-Chapter 2 Alt-05: Grade Separations, in Chapter 18, Standard Responses.

The comments provided in the City of Anaheim's attachments are addressed in responses to comments #2424 through #2514 below.

22.30.2 2423

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

22.30.3 2424

The misspelling of S Douglass Road on page 3.13-46 was corrected in the Final Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). Please refer to Section 16.5.13, Section 3.13: Station Planning, Land Use, and Development, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS for this revision.

22.30.4 2425

Table 3.17-2 has been revised to remove the Historic Move-On Home Program. Please refer to Section 16.5.17, Section 3.17: Cultural Resources, in Chapter 16 of the Final EIR/EIS for this revision.

22.30.5 2426

Page 3.16-19 was corrected in the Final EIR/EIS to indicate that the Platinum Triangle Master Land Use Plan was last amended on April 22, 2025. Please refer to Section 16.5.16, Section 3.16: Aesthetics and Visual Quality, in Chapter 16 of the Final EIR/EIS for this revision.

22.30.6 2427

Page 3.16-47 was corrected in the Final EIR/EIS to state that Angel Stadium Fireworks occur primarily after Saturday night home games. Please refer to Section 16.5.16 in Chapter 16 of the Final EIR/EIS for this revision.

22.30.7 2428

The California High-Speed Rail Authority (Authority) respectfully disagrees with the comment. The Los Angeles to Anaheim Project Section's (project section) proposed improvements at Anaheim Regional Transportation Intermodal Center (ARTIC) are based on careful consideration of the existing ARTIC facilities and services, and their capacity. Chapter 2, Alternatives, of the Draft EIR/EIS, Section 2.6.3.3, High-Speed Rail Station Facilities, states that the Authority will work with the City of Anaheim to share passenger amenities at ARTIC until ridership increases enough that combined high-speed rail (HSR) and local-provider passenger volumes exceed the design capacity of the ARTIC passenger terminal building. The Authority has included the separate HSR facilities and parking within the project footprint to establish the maximum environmental limits of the project. No revision has been made to the Draft EIR/EIS in response to this comment.

22.30.8 2429

Refer to response to comment #2423 above.

22.30.9 2430

Refer to response to comment #2423 above. Regarding parking in the area, the Authority has committed to developing a multimodal access plan prior to construction at ARTIC. This will be prepared in coordination with the City of Anaheim and will include a parking strategy to inform the final location, amount, and phasing of parking.

22.30.10 2431

Refer to response to comment #2423 above.

22.30.11 2432

The Authority has coordinated with the City of Anaheim beginning in 2013 regarding the design of Katella Avenue. As depicted in Volume 3.3, Part 3, of the Preliminary Engineering for Project Definition (PEPD), on sheets CV-T1576 and CV-T1577, the cross section includes eight lanes per past comments received from the City of Anaheim. Since then, the City of Anaheim has updated the Platinum Triangle Master Land Use Plan, with the most recent update in April 2025. Consistency with the Platinum Triangle Master Land Use Plan is evaluated in the Draft EIR/EIS in Section 3.13, Station Planning, Land Use, and Development, and in Appendix 3.1-A, Regional and Local Policy Inventory and Consistency Analysis. The project was found to be consistent with the Platinum Triangle Master Land Use Plan because the Shared Passenger Track Alternatives would not conflict with any of the principles contained in the plan. The Authority acknowledges the City of Anaheim's request to consider a six-lane configuration for Katella Avenue and will continue to coordinate with the City of Anaheim on the final right-of-way limits of Katella Avenue in future phases of design. The design analyzed in the Draft EIR/EIS represents the maximum environmental footprint for this area. The Final EIR/EIS has been revised to clarify consistency with the 2025 Platinum Triangle Master Land Use Plan in response to this comment. Please refer to Section 16.5.13, Section 3.13: Station Planning, Land Use, and Development, in Chapter 16 of the Final EIR/EIS for these revisions.

22.30.12 2433

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Because the design of the State College Boulevard undercrossing is being led by the City of Anaheim, any inconsistencies with the Platinum Triangle Master Land Use Plan would be addressed by the City of Anaheim. No revision has been made to the Draft EIR/EIS in response to this comment.

22.30.13 2434

Refer to response to comment #2423 above.

22.30.14 2435

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

22.30.15 2436

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

22.30.16 2437

The description of the Honda Center under #51 on page 3.16-47 has been revised in the Final EIR/EIS to reflect the current under-construction and completed improvements at the Honda Center. Please refer to Section 16.5.16 in Chapter 16 of the Final EIR/EIS for this revision.

22.30.17 2438

Page 3.16-19 was corrected in the Final EIR/EIS to depict that the Platinum Triangle Master Land Use Plan was last amended on April 22, 2025, and reflect the latest updates to the plan. Please refer to Section 16.5.16 in Chapter 16 of the Final EIR/EIS for this revision.

22.30.18 2439

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

22.30.19 2440

Refer to response to comment #2423 above.

22.30.20 2441

Refer to responses to comments #2423 and #2430 above.

22.30.21 2442

The Authority acknowledges that the City of Anaheim has designated this property for future residential use in its general plan. Section 3.13 of the Draft EIR/EIS assesses the project's consistency with local jurisdictions' general plans in relation to land use, and also evaluates impacts of land use conversion. The Authority will continue to coordinate with the City of Anaheim as the project section design advances, including regarding the location of the communication tower.

22.30.22 2443

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

As described in Section 3.2.4.3, Methods for Impact Analysis, the traffic modeling for the Horizon Year 2040 baseline scenario includes reasonably foreseeable transportation network modifications, including committed projects in the Southern California Association of Governments' 2020 Regional Transportation Plan/Sustainable Communities Strategy. The City of Anaheim's Lincoln Avenue Project has already been accounted for within the traffic model; therefore, no revision to the traffic analysis is required.

The Authority reviewed the attached plans at Lincoln Avenue and East Street. Section 3.2, Transportation, of the Draft EIR/EIS proposes two mitigation measures for this intersection: TRAN-MM#2, Restripe Intersections; and TRAN-MM#4, Add Exclusive Turn Lanes to Intersections. The modifications proposed in TRAN-MM#2 would still be able to be implemented at the recently improved Lincoln Avenue/East Street intersection with no changes to the hardscape. The measures proposed in TRAN-MM#4 would likely require property acquisitions, as stated in Table 3.2-27 in the Draft EIR/EIS. Section 3.2.7, Mitigation Measures, was revised in the Final EIR/EIS to clarify that detailed design and assessment of the mitigation measures would occur at a later phase in coordination with local jurisdictions. Refer to Section 16.5.2, Section 3.2: Transportation, in Chapter 16 of the Final EIR/EIS for the text additions.

22.30.23 2444

The Authority reviewed the attached plans for Orangewood Avenue provided by the City of Anaheim. The recently completed improvements start east of State College Boulevard, while the Authority's proposed improvements in TRAN-MM#2 are on the west side of State College Boulevard. The modifications proposed in TRAN-MM#2 would still be able to be implemented at the recently improved Orangewood Avenue/State College Boulevard intersection with no changes to the hardscape. Detailed design and assessment of the mitigation measures would occur at a later phase in coordination with the local jurisdictions.

The project section would not result in an adverse effect on Orangewood Avenue in the 2040 Horizon Year scenario. However, the Authority reviewed the recent modifications along Orangewood Avenue in the traffic model to verify if there would be a change in impacts and determined that this project had been captured appropriately in the intersection analysis but inadvertently excluded in the roadway segment analysis. With inclusion of the Orangewood Avenue modifications, the roadway segment would no longer operate at level of service E or F in both the No Project and with-project scenarios in Horizon Year 2040. There would be no change in the affected intersections as presented in the Draft EIR/EIS.

Table 3.2-17 of the Draft EIR/EIS has been updated in the Final EIR/EIS to present that Orangewood Avenue would not exceed the level of service threshold from State College Boulevard to Rampart Street and from Rampart Street to State Route 57 in the No Project scenario in Horizon Year 2040. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for the revision.

22.30.24 2445

As described in Draft EIR/EIS Section 3.8, Hydrology and Water Resources, Impact HWR-2, stormwater management, including runoff volumes and rates, and treatment measures would be in compliance with the applicable municipal separate storm sewer system (MS4) permit. Section 3.8.2.2, State, states that the Authority must follow the discharge, program, and monitoring requirements of the Phase II MS4 permit within its right-of-way in Los Angeles County (Los Angeles Regional Water Quality Control Board [RWQCB] jurisdiction) and Orange County (Santa Ana RWQCB jurisdiction). The City of Anaheim is covered under the Orange County MS4 permit. Project improvements including post-construction water run-on/runoff treatment would therefore comply with the requirements of the Orange County MS4 permit, which covers the City of Anaheim.

To offset on- and off-site hydrology effects associated with new impervious surfaces, the project design will include permanent best management practices required by the applicable Clean Water Act Section 402 National Pollutant Discharge Elimination System MS4 permits to avoid permanent hydromodification effects, consistent with HYD-IAMF#1, Stormwater Management. HYD-IAMF#1 requires preparation of a stormwater management and treatment plan in compliance with MS4 permits. HYD-IAMF#1 also requires low-impact development techniques be used to detain runoff on site, reduce off-site runoff, and provide stormwater treatment. Stormwater facilities will be built in compliance with the applicable local (Orange County) or Authority's MS4 permit design standards. HYD-IAMF#1 will also apply to project operation regarding detention of runoff on site, reducing off-site runoff, and providing stormwater treatment during project operation (refer to Impact HWR-10 of the Draft EIR/EIS). No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.25 2446

Utility impacts related to the State College Boulevard grade separation are included in Volume 3.3A of the PEPD. These designs were prepared by the City of Anaheim and incorporated into the project section design. As discussed under Impact PU&E#1 in Section 3.6, Public Utilities and Energy, of the Draft EIR/EIS, the Authority will incorporate PUE-IAMF#4, Utilities and Energy, which requires the Authority-designated contractor to prepare a technical memorandum documenting how construction activities will be coordinated with service providers to minimize or avoid interruptions to utility services. Incorporation of PUE-IAMF#4 would minimize risk of utility interruptions, including those to residences on the west side of State College Boulevard.

22.30.26 2447

The incorrect roadway name on page S-14 of the Draft EIR/EIS, in Table S-2, was corrected in the Final EIR/EIS from "Sixth Street" to "South Street." Refer to the Summary for this correction, which has been republished as part of the Final EIR/EIS.

22.30.27 2448

The Authority has updated the capital and operations and maintenance costs for the project section, based on the most recent cost estimates prepared for the Authority's 2026 Business Plan. Refer to Section 16.8, Chapter 6: Project Costs and Operations; and Section 16.52, Appendix 6-A: High-Speed Rail Operating and Maintenance Cost for Use in Environmental Impact Report/Environmental Impact Statement Project-Level Analysis, in Chapter 16 of the Final EIR/EIS for these revisions.

22.30.28 2449

Table 3.2-2 was revised in the Final EIR/EIS to state that the City of Anaheim's general plan also includes planned grade separations at Orangethorpe Avenue, La Palma Avenue, Ball Road, Cerritos Avenue, and State College Boulevard. Please refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.30.29 2450

Table 3.2-18 has been revised in the Final EIR/EIS to remove the three projects that have been completed. Please refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.30.30 2451

Table 3.2-20 was revised in the Final EIR/EIS for the Lewis Street detour to state that vehicles would turn right at Anaheim Boulevard, not Haster Street. Please refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.30.31 2452

Table 3.2-20 was revised in the Final EIR/EIS for the State College Boulevard detour to state vehicles would turn left on Katella Avenue. Please refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.30.32 2453

Table 3.2-20 was revised in the Final EIR/EIS for the Douglass Road detour to state vehicles would turn right on Katella Avenue. Please refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.30.33 2454

The grade separation at Douglass Road was not included in the Segment 3 ambient air quality analysis and health risk assessment, because there are no residential receptors within 1,000 feet of the Douglass Road grade separation construction work. Based on the Fullerton Municipal Airport meteorological data, which were used for the Segment 3 analysis, the wind blows predominantly to the north and west; refer to Appendix A of the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report*.

The highest worker and residential cancer risk in Segment 3 was modeled near the State College Boulevard grade separation. The maximum worker receptor (Universal Transverse Mercator Zone 11 Easting: 417745, Northing: 3740995) is approximately 55 feet to the north of the modeled State College Boulevard grade separation, and the maximum residential receptor (Universal Transverse Mercator Zone 11 Easting: 417650, Northing: 3740900) approximately 60 feet to the west. This resulted in a worker risk of 0.8 in a million and the highest residential cancer risk of 2.8 in a million; refer to Table 3.3-37 in Draft EIR/EIS Section 3.3, Air Quality and Global Climate Change.

The nearest worker receptor to the Douglass Road grade separation would be approximately 60 feet to the north-northwest, like the receptor modeled at the State College Boulevard grade separation. However, the State College Boulevard grade separation would have a 2.92-year construction duration, while the Douglass Road grade separation would only have a 1.75-year construction duration. In addition, construction of the State College Boulevard grade separation would require the use of 15 more pieces of heavy-duty diesel construction equipment compared to the Douglass Road grade separation; refer to Appendix A of the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report*. Therefore, because the worker receptor distances and direction downwind from the construction activities are similar for both grade separations, the State College Boulevard grade separation accurately modeled the worst-case worker receptor risk, because this grade separation would have a substantially longer construction duration with more heavy-duty diesel construction equipment in use than the Douglass Road grade separation. Furthermore, the highest calculated worker receptor risk is approximately 3,300 feet east of the Douglass Road grade separation; therefore, construction at the Douglass Road grade separation would not affect the maximum worker cancer risk modeled.

There are no residential receptors within 1,000 feet of the Douglass Road grade separation. The nearest sensitive use with short-term residents would be the Ayres Hotel, approximately 600 feet to the north of the Douglass Road grade separation, but these are not residential receptors. Like the maximum worker cancer risk receptor, the residential receptor with the highest cancer risk is over 3,500 feet to the east of the Douglass Road grade separation.

Similarly, for the ambient air quality analysis, because the State College Boulevard grade separation would have a longer construction duration than the Douglass Road grade separation (2.92 years versus 1.75 years), with more pieces of construction equipment in use, and the nearest affected receptors modeled near the State College Boulevard grade separation are approximately in the same

direction and distance as the nearest worker receptor to the Douglass Road grade separation, the current Segment #3 analysis sufficiently analyzes the worst-case construction emissions in this region. Lastly, as highlighted in Table 3.3-34 of Draft EIR/EIS Section 3.3, the highest pollutant risks modeled at Segment 3 (carbon monoxide 8-hour, particulate matter less than or equal to 10 microns in diameter annual, and particulate matter less than or equal to 2.5 microns in diameter annual) are below the standard/threshold. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.34 2455

The commenter requests that the proposed sound barrier between Cyprus Street and Sycamore Street be installed along both sides of the railroad corridor, instead of only along the northbound side. In this area, although the homes on both sides of the corridor are at similar distances from the tracks, the homes adjacent to the southbound side of the tracks have an existing wall between them and the railroad corridor. This existing wall would be effective at reducing wheel-rail noise from high-speed trains on the southbound track, and therefore the overall train noise exposure levels are projected to be a moderate noise impact for the homes on this side. In contrast, a severe noise impact is projected for the homes on the northbound side, where there are no existing walls. N&V-MM#3, Implement California High-Speed Rail Project Noise Mitigation Guidelines, in Section 3.4.7, Mitigation Measures, would be implemented following the Authority's noise mitigation guidelines with criteria for what constitutes a reasonable and feasible sound barrier. Based on the Authority's noise mitigation guidelines, the sound barrier is not required for the southbound side. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.35 2456

Table 3.8-8 has been revised in the Final EIR/EIS to include the Santa Ana River. Please refer to Chapter 16, Section 16.5.8, Section 3.8: Hydrology and Water Resources, of the Final EIR/EIS.

22.30.36 2457

The commenter is correct. Table 3.17-10 has been revised for the Historic Palm District and Anaheim Colony Historic District to remove "Fullerton" and add "Anaheim." Please refer to Section 16.5.17, Section 3.17: Cultural Resources, in Chapter 16 of the Final EIR/EIS for this revision.

22.30.37 2458

Refer to Standard Response LAA-Response-Chapter 2 Alt-05: Grade Separations, in Chapter 18.

The Authority respectfully disagrees with the assertion that the grade separation decision was subjective. The Authority's decision considered many additional factors, such as impacts on surrounding neighborhoods, property acquisitions, constructability, impacts on railroad operations, cost, and others. Refer to the 2024 Preliminary Impacts Assessment for a more detailed description of the Authority's evaluation and recommendation for the Preferred Alternative.

22.30.38 2459

Refer to Standard Response LAA-Response-Chapter 2 Alt-05: Grade Separations, in Chapter 18.

22.30.39 2460

Refer to Standard Response LAA-Response-Chapter 2 Alt-05: Grade Separations, in Chapter 18.

22.30.40 2461

Refer to Standard Response LAA-Response-Chapter 2 Alt-05: Grade Separations, in Chapter 18.

22.30.41 2462

Impact SS-12 in Section 3.11, Safety and Security, of the Draft EIR/EIS acknowledges that the Ball Road at-grade crossing could create queue lengths long enough to block the adjacent intersection at Lewis Street. As stated in Impact SS-12, this condition already exists with BNSF Railway (BNSF), Metrolink, and Amtrak trains. Although the addition of HSR trains would increase the total number of

gate-down sequences occurring each day, it would not increase the queueing time of any single gate-down sequence. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.42 2463

Section 3.11 of the Draft EIR/EIS provides more information regarding the gate-down time analysis. The Authority's study is included as a reference document, listed in Chapter 12, References/Sources Used in Document Preparation, of the Draft EIR/EIS. The commenter refers to "eight separate crossing activations for the 15-minute headway per direction," but it is not clear which train schedules the commenter is referring to. Metrolink and Amtrak currently operate one train per hour in each direction, although Metrolink plans to decrease headways to 30 minutes as part of its Southern California Optimized Rail Expansion Program. HSR would operate up to two trains per direction per hour. Each passenger train gate-down sequence takes approximately 1 minute. BNSF trains do not run on a set schedule within this corridor, but there are currently about four trains per day with a gate-down sequence of fewer than 6 minutes. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.43 2464

As described in Section 3.11.6.3, Project Impacts, of the Draft EIR/EIS, the Authority conducted a geographic information system screening analysis to assess potential impacts on fire station response times. This analysis included consideration of Fire Station #1 in Anaheim. The Authority's methodology was conservative, because it excluded any kind of emergency response technologies (such as signal preemption or real-time communications) or allowing for flexible routing or dispatching from within the field. Therefore, the screening analysis represented a worst-case scenario where emergency responders would only be dispatched from the closest station and would receive no priority treatment at intersections. With these assumptions, the assessment found that the probability that an emergency response vehicle would encounter a gate-down event would increase by 7 percent each hour. However, the response time of an individual trip across the rail corridor would be similar to that of the No Project Alternative condition. Nevertheless, to ensure that delays in response times are minimized and the City of Anaheim's ability to deliver emergency services is not impaired, the Authority would implement SS-MM#1, Implement Emergency Response Time Mitigation Strategies, which requires the Authority to conduct monitoring to identify the extent to which HSR operations would affect the City of Anaheim's response times and implement targeted mitigation strategies at specific locations. With implementation of SS-MM#1, emergency vehicle response delays would be reduced.

22.30.44 2465

Section 3.2 of the Draft EIR/EIS identifies unsignalized intersections that meet traffic signal warrants to reduce adverse effects related to level of service. The unsignalized intersections that would warrant signalization are identified in TRAN-MM#3, Add Signal to Intersection to Improve Level of Service/Operation.

With respect to sight distance, the vertical curves at the proposed grade separations have been designed to the required length, pursuant to standard sight-distance formulas. The designs of the proposed grade separations also take into account the existing conditions, including posted speed limits. For Cerritos Avenue, the posted speed limit is 40 miles per hour, and Vernon Street and Allec Street are currently unsignalized.

The Authority will coordinate with the City of Anaheim as designs progress to determine if additional studies are needed for signalization. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.45 2466

The Authority does not propose to close Sycamore Street and South Street. Volume 3.3, drawing CV-T0471, had erroneously depicted an outdated design for Sycamore Street; this sheet was revised in the Final EIR/EIS to depict it as an at-grade crossing. Please refer to Section 16.56.3, Volume 3.3, General and Grade Separations, in Chapter 16 of the Final EIR/EIS for this revision.

Similarly, the *Los Angeles to Anaheim Project Section Transportation Technical Report* erroneously included outdated text regarding the closure of Sycamore and South Streets. However, the traffic analysis was conducted based on the correct project definition that maintained the at-grade crossings. This sentence was revised in the *Los Angeles to Anaheim Project Section Transportation Technical Report*.

Although drawing CV-T0471 and the *Los Angeles to Anaheim Project Section Transportation Technical Report* contained an error, the environmental analyses had been conducted based on the correct project definition and environmental footprint, which keeps Sycamore and South Streets as at-grade crossings. There are no mitigation measures associated with closing these roads. Therefore, no other revisions are needed to the Draft EIR/EIS.

22.30.46 2467

This freeway project is outside of the project section resource study area and, therefore, was not modeled in the traffic analysis. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.47 2468

The Authority will continue to coordinate with the City of Anaheim as the project design advances.

22.30.48 2469

This comment is noted.

22.30.49 2470

The PEPD includes sufficient width for all required HSR elements. For the State College Boulevard grade separation, the proposed bridge width accommodates four tracks and the overhead contact system poles, which will likely be on either side of the bridge and span across the length of the bridge. No expansion of the proposed bridge is required.

22.30.50 2471

The Authority acknowledges the City of Anaheim's support of TRAN-MM#7, Add Lane to State Route 57/Westbound Katella Avenue Southbound On-Ramp, and will continue to coordinate with the City of Anaheim as designs progress.

22.30.51 2472

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

The Authority will continue to coordinate with the City of Anaheim as well as the Angels in regard to the proposed plans at the stadium parking.

22.30.52 2473

The Authority reviewed the roadway changes proposed by OCVIBE within the traffic model to verify if there would be a change in impacts; based on the modeling, there would be no changes in affected intersections or roadway segments in Anaheim. The Authority will continue to coordinate with the City of Anaheim and OCVIBE as both projects advance. Detailed design and assessment of the mitigation measures would occur at a later phase in coordination with the City of Anaheim.

22.30.53 2474

The Authority acknowledges that the City of Anaheim has a Planned Vehicular Network in its general plan, with final buildout intersection configurations for the future. Some of the final intersection configurations would increase the roadway capacity in those areas, but because the timing of these final configurations is not certain, they were not considered as part of the baseline conditions and not modeled. The Horizon Year 2040 traffic analysis, therefore, is conservative in identifying impacts and mitigation measures and assuming the existing intersection conditions. Detailed design and assessment of the mitigation measures would occur at a later phase in coordination with the local

jurisdictions. The Authority will work with the City of Anaheim to refine the measures as needed, based on the intersection configuration existing at that time.

22.30.54 2475

The traffic analysis did not model a closure at Sycamore Street. The proposed mitigation measures at Intersection G44 address adverse effects resulting from projected traffic volumes as a result of HSR operations. The Authority acknowledges the City of Anaheim's requests on how mitigation measures would be implemented to address traffic impacts. Detailed design and assessment of the mitigation measures would occur at a later phase in coordination with the local jurisdictions.

22.30.55 2476

The Authority acknowledges the City of Anaheim's preference for how to implement this mitigation measure to address traffic impacts. Detailed design and assessment of the mitigation measures would occur at a later phase in coordination with the local jurisdictions.

22.30.56 2477

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

22.30.57 2478

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

The improvements identified by the Authority as necessary for mitigating adverse traffic delay are described in Section 3.2.7 of the Draft EIR/EIS. In some cases, multiple improvements are proposed for a single intersection; in these cases, the affected intersection is listed under the mitigation measure that pertains to the site's specific type of improvement.

With respect to the State College Boulevard/Orangewood Avenue intersection, the Draft EIR/EIS evaluates potential adverse effects on delay at signalized intersections under Impact TR-10. As detailed therein, the Draft EIR/EIS identifies the State College Boulevard/Orangewood Avenue intersection as adversely affected under Horizon Year 2040 Plus Project conditions. To address the adverse delay at this intersection, TRAN-MM#2 correctly provides that the eastbound shared through and right-turn lane would be converted to an exclusive through lane. However, an additional improvement at this intersection was inadvertently left out of TRAN-MM#4.

TRAN-MM#4 has been revised to include the missing improvement at the State College Boulevard/Orangewood Avenue intersection. An exclusive right-turn lane would also be added to the eastbound approach, under TRAN-MM#4. Table 3.2-37 has been revised to include the secondary impacts from implementation of this provision of TRAN-MM#4. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for these revisions.

22.30.58 2479

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

The Authority appreciates the City of Anaheim's feedback on TRAN-MM#2 and TRAN-MM#4.

22.30.59 2480

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

The Authority acknowledges the City of Anaheim's preference for how TRAN-MM#4 would be implemented to address traffic impacts.

22.30.60 2481

The Lemon Street south of Orangethorpe Avenue roadway segment was revised to include State Route 91 as the southern limit throughout Section 3.2. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for the correction.

22.30.61 2482

The PEPD presents all existing utilities based on available as-built information received at the time of design development. The PEPD plans are intended to define the environmental footprint for impact analysis at a 15 percent design level. The Authority will continue coordination with the City of Anaheim and utility agencies as the designs progress to ensure that all affected utilities are identified and addressed.

22.30.62 2483

The Authority acknowledges the City of Anaheim's standards and requirements regarding water utilities. The PEPD presents all existing utilities based on available as-built information received at the time of design development, with affected utilities proposed to be protected in place or relocated to avoid conflicts during construction and operation of the HSR project. The proposed designs are at a 15 percent design level. The Authority will continue coordination with the City of Anaheim and utility agencies as the designs progress to ensure that all affected utilities are identified and addressed in accordance with the City of Anaheim's specifications.

22.30.63 2484

Refer to response to comment #2483 above.

22.30.64 2485

Refer to response to comment #2483 above.

22.30.65 2486

Structural calculations will be done in a more advanced design phase. The Authority proposes to use the existing tracks at the eight crossings that would remain at grade in Anaheim, so structural calculations at these crossings may not be necessary.

22.30.66 2487

The commenter appears to be referring to the 18-inch concrete cylinder pipe, which is depicted on sheet UT-C1607 as "protect-in-place." Note that the "UT-D" sheets are intended to only depict proposed relocations of utilities as applicable. Refer to Volume 3.4, sheets UT-C1607 through UT-C1623, for more detailed information on the utilities in Anaheim. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.67 2488

The commenter refers to a 12-inch water main, which is depicted on sheet UT-C1608 as "protect-in-place." Note that the "UT-D" sheets are intended to only depict proposed relocations of utilities as applicable. Refer to Volume 3.4, sheets UT-C1607 through UT-C1623, for more detailed information on the utilities in Anaheim. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.68 2489

The commenter refers to a 12-inch ductile iron pipe, which is depicted on sheet UT-C1609 as "protect-in-place." Note that the "UT-D" sheets are intended to only depict proposed relocations of utilities as applicable. Refer to Volume 3.4, sheets UT-C1607 through UT-C1623, for more detailed information on the utilities in Anaheim. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.69 2490

The commenter refers to a 10-inch ductile iron pipe, which is depicted on sheet UT-C1610 as "protect-in-place." Note that the "UT-D" sheets are intended to only depict proposed relocations of utilities as applicable. Refer to Volume 3.4, sheets UT-C1607 through UT-C1623, for more detailed information on the utilities in Anaheim. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.70 2491

The commenter refers to a 18-inch cast iron pipe, which is depicted on sheet UT-C1611 as "protect-in-place." Note that the "UT-D" sheets are intended to only depict proposed relocations of utilities as applicable. Refer to Volume 3.4, sheets UT-C1607 through UT-C1623, for more detailed information on the utilities in Anaheim. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.71 2492

Refer to Volume 3.4, sheets UT-C1607 through UT-C1623, for more detailed information on the utilities in Anaheim. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.72 2493

The commenter refers to a 12-inch ductile iron pipe, which is depicted on sheet UT-C1612 as "protect-in-place." Note that the "UT-D" sheets are intended to only depict proposed relocations of utilities as applicable. Refer to Volume 3.3, sheet CV-T0491, for more detailed information on the utilities in Anaheim. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.73 2494

The commenter refers to a 12-inch ductile iron pipe, which is depicted on sheet UT-C1613 as "protect-in-place." Note that the "UT-D" sheets are intended to only depict proposed relocations of utilities as applicable. Refer to Volume 3.3, sheet CV-T0491, for more detailed information on the utilities in Anaheim. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.74 2495

The commenter refers to a 16-inch ductile iron pipe, which is depicted on sheet UT-C1614 as "protect-in-place." Note that the "UT-D" sheets are intended to only depict proposed relocations of utilities as applicable. Refer to Volume 3.3, sheet CV-T0511, for more detailed information on the utilities in Anaheim. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.75 2496

The commenter refers to a 18-inch cast concrete pipe lining, which is depicted on sheet UT-C1616 as "protect-in-place." Note that the "UT-D" sheets are intended to only depict proposed relocations of utilities as applicable. Refer to Volume 3.3, sheet CV-T0521, for more detailed information on the utilities in Anaheim. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.30.76 2497

The commenter refers to a 16-inch concrete cylinder pipe, which is depicted on sheet UT-Y1547 as a proposed relocation. Refer to response to comment #2483 above.

22.30.77 2498

The utility is included in Volume 3.4, sheet UT-C1617. The utility owner has been corrected to Metropolitan Water District in Volume 3.4 of the Final EIR/EIS. Refer to Section 16.56.5, Volume 3.4, General, Utilities, Grading/Drainage, Traction Power, and Communication Towers, in Chapter 16 for revisions.

22.30.78 2499

The commenter refers to a 12-inch cast iron pipe, which is depicted on sheets UT-Y1556 through UT-Y1557 as a proposed relocation. Refer to response to comment #2483 above.

22.30.79 2500

The commenter refers to a 10-inch cast iron pipe at Vernon Street; note that the Authority's data indicate this existing utility is a 12-inch cast iron pipe. This utility is depicted on sheets UT-Y1556 through UT-Y1557 as a proposed relocation. Refer to response to comment #2483 above.

22.30.80 2501

The commenter refers to a pressure regulating station and vault, which are depicted on sheets UT-Y1556 through UT-Y1557 as a proposed relocation. Refer to response to comment #2483 above.

22.30.81 2502

The commenter refers to a 18-inch cast iron pipe within State College Boulevard. Utility relocations associated with the State College Boulevard grade separation are included in Volume 3.3A, General and State College Grade Separations (By OCTA), of the Draft EIR/EIS. These plans were developed by the City of Anaheim and Orange County Transportation Authority (OCTA) and included in Volume 3 of the Draft EIR/EIS in their entirety.

22.30.82 2503

The commenter refers to a 12-inch cast iron pipe, which is depicted in sheets UT-Y1576 through UT-Y1577 as a proposed relocation. Refer to response to comment #2483 above.

22.30.83 2504

At time of design, as-built information on the exact location and extent of underground limits of these wells and perfluoroalkyl and polyfluoroalkyl substances (PFAS) treatment facilities was not provided or available. Based on available data, these existing wells and facilities appear to be outside the project limits; the Authority will coordinate with City of Anaheim on future design and impacts if applicable.

22.30.84 2505

Refer to Volume 3.4, sheet UT-C1622, of the PEPD, which depicts this utility.

22.30.85 2506

The commenter refers to a 16-inch ductile iron pipe, which is depicted on sheets UT-Y1576 through UT-Y1577 as a proposed relocation. Refer to response to comment #2483 above.

22.30.86 2507

The commenter states that Anaheim Public Utilities plans to extend a water line in Douglass Road to meet the city's future demands. The project section would not affect this water line and would not create new water demand that necessitates this extension. The Authority will pay for the relocation of all utilities that would be affected by the HSR project.

22.30.87 2508

Refer to response to comment #2483 above.

22.30.88 2509

Refer to response to comment #2504 above.

22.30.89 2510

The commenter refers to fire access conditions at the proposed State College Avenue grade separation. The State College Avenue grade separation design was prepared by the City of Anaheim and OCTA, and included in the Los Angeles to Anaheim PEPD in its entirety as Volume 3.3A. The

Authority does not have detailed plans of the grade separation at this time, but will coordinate with the City of Anaheim, OCTA, and Anaheim Fire and Rescue as the design progresses to ensure that the designs are in accordance with the City of Anaheim's standards.

22.30.90 2511

Refer to response to comment #2510 above.

22.30.91 2512

The Authority acknowledges the City of Anaheim's standards and requirements regarding fireworks fallout requirements. The Authority will continue to coordinate with the City of Anaheim as the designs progress to ensure that HSR facilities meet the City of Anaheim's requirements.

22.30.92 2513

The commenter is correct that all bridges and tunnels shall have a minimum vertical clearance of 14 feet.

22.30.93 2514

The Authority acknowledges the City of Anaheim's standards and requirements regarding fire hydrants. The Authority will continue to coordinate with the City of Anaheim's Water Engineering and Anaheim Fire and Rescue as the designs progress to ensure that all affected utilities are identified and addressed in accordance to City of Anaheim standards.

Los Angeles to Anaheim - RECORD #013861 DETAIL

Status:	Action Pending
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Latasha James

Stakeholder Comments/Issues:

Good afternoon, Please see the attached letter from Regional Planning responding to comments regarding the Los Angeles to Anaheim EIR/EIS. Thank you, LATASHA JAMES, (she/her/hers) Senior Secretary III Advance Planning Division Office: • Direct: 213-893-7027 Email: Ljames@Planning.lacounty.gov Los Angeles County Department of Regional Planning 320 West Temple Street, 13th Floor, Los Angeles, CA 90012 planning.lacounty.gov Our field offices are currently open to the public. Please visit planning.lacounty.gov for information about available services, public meeting schedules, and planning projects

LA COUNTY PLANNING

AMY J. BODEK, AICP
Director,
Regional Planning

DENNIS SLAVIN
Chief Deputy Director,
Regional Planning

February 3, 2026

California High-Speed Rail Authority
Los Angeles to Anaheim Draft EIR/EIS Comment
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071

Dear California High-Speed Rail Authority:

NOTICE OF AVAILABILITY OF THE CALIFORNIA HIGH-SPEED RAIL AUTHORITY'S LOS ANGELES TO ANAHEIM PROJECT SECTION'S DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT

Los Angeles County Department of Regional Planning (LA County Planning) appreciates the opportunity to comment on the California High-Speed Rail Authority's Los Angeles to Anaheim "LA-A) Project Section's Draft Environmental Impact Report/Environmental Impact Statement (DEIR). We respectfully request that the items outlined below be considered in clarifying the analysis and mitigation framework for the LA-A Project Section.

Comments on the DEIR:

1137 **1. Page 3.7-13, Table 3.7-1 (Los Angeles County 2035 General Plan policies regarding Significant Ecological Areas)**

The County of Los Angeles Significant Ecological Areas (SEA) are not static, and are subject to periodic review and revision, so the following revised paragraph is provided here for clarification. Please note that the County of Los Angeles is currently in the process of a SEA update study, and SEA boundaries may be modified again within the next 1 – 2 years.

"The SEA Program was established by the Los Angeles County General Plan in 1982. In 2015, the Board of Supervisors approved the Antelope Valley Area Plan and the General Plan 2035, which created the boundaries and categories for the currently designated SEAs. The SEA Program is intended to aid applicants and staff with implementation of the General Plan goals and policies, zoning code regulations, and LA County Planning procedures. The General Plan establishes the location of the SEAs, the description of SEAs (e.g., habitat types, unique resources), and program policies. The SEA Ordinance, a component of the County Zoning Code (Title 22), is the implementation tool of the SEA Program, which establishes the permitting standards and process for development within SEAs.

1137 Further, if the parenthetical year association with the General Plan title is to indicate its adoption year, then it should be changed from 2025 to 2015 ,since the current General Plan was adopted in 2015.

1138 **2. Page 3.7-36 (Special-Status Wildlife and Plant Species Protocol/Focused Surveys)**

The title of this section mentions special-status plant surveys; however, no such surveys are discussed in the section. Please clarify if any were conducted or revise the section heading.

1139 **3. Page 3.7-48, Table 3.7-5 and page 3.7-62 (Special-Status Reptile Discussions)**

Legless lizard should be considered potentially present for reasons similar to those given in the table for horned lizard. Legless lizards are cryptic and likely to be under-reported. The species is known from Whittier Narrows and Buena Park (iNaturalist), and records from suburban communities elsewhere in the region (Crescenta Valley, San Fernando Valley, Claremont) indicate a tolerance for moderate levels of human disturbance.

1140 **4. Page 3.7-70 (Arroyo Toad Identification)**

The current scientific name (as of ca. 2006) of arroyo toad is *Anaxyrus californicus*.

1141 **5. Page 3.7-73 (Protected Trees)**

The City of Los Angeles protected tree ordinance originally referred to *Quercus dumosa* but currently references *Q. berberidifolia*. The name *Quercus dumosa* is currently reserved for Nuttal's scrub oak, which is a rare species that is restricted to Coastal Southern California – the unmitigated loss of which would be a potentially significant impact under the California Environmental Quality Act. This section should therefore be revised to be consistent with the current version of the City of Los Angeles' protected tree ordinance.

1142 **6. Page 3.7-79 (BIO-MM#55)**

The following sentence is unclear: "The WCP requires the use of Environmentally Sensitive Areas, weed surveys, fire prevention, and other methods to avoid the spread of noxious weeds that could outcompete this resource." Please specify the resource that is being referred to in this sentence.

1143 **7. Page 3.7-87, Table 3.7-12 (Estimated Potential Effects on Suitable Habitat for Special-Status Wildlife Species)**

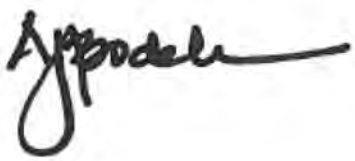
The table omits mention of any of the special-status reptile species addressed in other portions of the DEIR.

1144 **8. Page 3.7-130 (BIO-MM#44)**

The measure should acknowledge the need for an Incidental Take Permit to authorize these mitigation actions in the event that burrowing owl is listed or is still a Candidate for listing under the California Endangered Species Act at the time of project construction.

Thank you for the opportunity to provide these comments. LA County Planning looks forward to continued coordination with the California High-Speed Rail Authority throughout the development of the DEIR. Please contact us if additional clarification or discussion would be helpful. For any follow-up on these submitted comments, please contact Joseph Decruyenaere, Senior Biologist, at jdecruyenaere@planning.lacounty.gov.

Sincerely,



AMY J. BODEK, AICP
Director of Regional Planning

AJB:CC:ER:TH:JD:lj

S_02_03_26_AP_L_ CALIFORNIA_HIGH_SPEED_RAIL_AUTHORITY_LETTER

22.31 Response to Submission 013861 (Latasha James, Los Angeles County Department of Regional Planning, Feb 3, 2026)

22.31.1 1137

Regarding the Significant Ecological Areas portion of Table 3.7-1, the California High-Speed Rail Authority (Authority) has replaced the existing text with the text provided by the commenter. Please refer to Section 16.5.7, Section 3.7: Biological and Aquatic Resources, in Chapter 16, Corrections and Additions to the Draft Report, of the Final Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) for these changes.

The date of the general plan remains unchanged because it represents the most recent (April 15, 2025) update to the entire general plan available online. This has been clarified in the full citation in Section 16.5.7 in Chapter of the Final EIR/EIS.

22.31.2 1138

The Authority has revised the Special-Status Wildlife and Plant Species Protocol/Focused Surveys subsection of Section 3.7.4.3, Methods for Impact Analysis, in the Final EIR/EIS to include a paragraph regarding protocol surveys for plant species. Please refer to Section 16.5.7 in Chapter 16 of the Final EIR/EIS for these changes.

22.31.3 1139

The Los Angeles to Anaheim Project Section is within the range of the California legless lizard. However, this species was excluded from the Draft EIR/EIS based on the species' preference for lower temperatures, between 70 and 82 degrees Fahrenheit. In addition, this species is found mainly in dunes, with bush habitats and other native coastal shrubs. As stated in Appendix A of the *Los Angeles to Anaheim Project Section Biological and Aquatic Resources Technical Report*, shrubs are essential to this species because they provide leaf litter to keep temperatures low and moisture content high on hot days. Although this species may be present in Whittier Narrows, shrubs were not present at sufficient levels in the Wildlife Biological Study Area (BSA) to support this species.

Within potentially suitable habitat for this species that was identified in the Wildlife BSA (within the Rio Hondo and Spreading Grounds and the San Gabriel River), both tree and shrub cover are absent in the project area. Within the Wildlife RSA at the Rio Hondo and Spreading Grounds, the channel is unvegetated and the majority of the adjacent vegetation is annual brome grasslands. Two small Goodding's black willows occur in the Wildlife RSA, but they do not provide sufficient cover or leaf litter to support this species. Similarly, at the San Gabriel River, minimal to no trees are present to provide cover or leaf litter, with the majority of vegetation being annual brome grasslands, with a limited area of cattail marsh. A few small Goodding's black willows occur at the edges of the channel, but are not of a large enough size or number to provide sufficient cover or leaf litter for this species. Ongoing flood-control activities create consistent soil disturbance that would adversely affect this species in both drainages. Therefore, this species was not included in the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.31.4 1140

The Authority has revised Section 3.7.5.1, Wildlife Movement Corridors, of the Draft EIR/EIS to include the correct scientific name for arroyo toad. Please refer to Section 16.5.7 in Chapter 16 of the Final EIR/EIS for these changes.

22.31.5 1141

The Authority has revised Section 3.7.5.2, Protected Trees, of the Draft EIR/EIS to include the correct scientific name for scrub oak. Please refer to Section 16.5.7 in Chapter 16 of the Final EIR/EIS for these changes.

22.31.6 1142

Impact BIO-1 in Section 3.7, Biological and Aquatic Resources, of the Draft EIR/EIS includes a discussion regarding the temporary impacts on riparian habitat and special-status natural

communities, as stated in the paragraph preceding the list of mitigation measures. The mitigation measures would be implemented to further minimize, reduce, avoid, or offset temporary effects on riparian and special-status natural communities during construction. The “resource(s),” therefore, referenced in BIO-MM#55, Prepare and Implement a Weed Control Plan, are special-status natural communities and riparian habitat, as specified by the leading paragraph. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.31.7 1143

The Authority acknowledges the comment. Refer to response to comment #1139 above. Special-status reptiles are addressed in the *Los Angeles to Anaheim Project Section Biological and Aquatic Resources Technical Report* because impacts are determined to be less than significant. Suitable cover for the legless lizard is not present in the project area, because there is no cover present for this species and there is a high degree of disturbance from flood-control activities. As described in response to comment #1139, there is limited cover (few Goodding’s black willows) within the Wildlife RSA. Ongoing flood-control activities create consistent soil disturbance that would adversely affect this species in both drainages. Therefore, this species was not included in the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.31.8 1144

The Authority revised BIO-MM#44, Obtain an Incidental Take Permit under the California Endangered Species Act for Burrowing Owl, in the Final EIR/EIS to be a mitigation measure regarding obtaining an incidental take permit for Burrowing Owl. This revision does not change the analysis or conclusions of the Draft EIR/EIS because Burrowing Owl impacts have been fully addressed by implementation of BIO-MM#20, Conduct Protocol Surveys for Burrowing Owls; BIO-MM#21, Implement Avoidance and Minimization Measures for Burrowing Owl; and the original BIO-MM#44, Provide Compensatory Mitigation for Loss of Active Burrowing Owl Burrows and Habitat. BIO-MM#44 has been revised to include the application for an incidental take permit, which, if a take permit is required, would include the details of compensatory mitigation, which was the original language of BIO-MM#44. Refer to Section 16.5.7 in Chapter 16 of the Final EIR/EIS for these changes.

Los Angeles to Anaheim - RECORD #013864 DETAIL

Status:	Action Pending
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Chris Schaefer



Stakeholder Comments/Issues:

Good Afternoon, Please find attached the City of Fullerton's comment letter for the LA to Anaheim Draft EIR/EIS document. Please provide confirmation of receipt. Thanks! Chris Schaefer, AICP Planning Manager p: 714.738.6884 e: chris.schaefer@cityoffullerton.com 303 W. Commonwealth Ave. Fullerton, CA 92832 www.cityoffullerton.com Disclaimer: This electronic transmission, and any documents attached hereto, may contain confidential and/or legally privileged information. The information is intended only for use by the recipient named above. If you have received this electronic message in error, please notify the sender and delete the electronic message. Any disclosure, copying, distribution, or use of the contents of information received in error is strictly prohibited.

CITY OF FULLERTON
Community and Economic Development Department

California High-Speed Rail Authority (CHSRA)
Attn: Lijia Zhang, PE, PMP
770 L Street, Suite 800
Sacramento, CA 95814

February 2, 2026

Re: Comments to Los Angeles to Anaheim Project Section Draft Environmental Impact Report / Environmental Impact Statement (EIR/EIS)

Dear Mr. Zhang:

The City of Fullerton has reviewed the *Los Angeles to Anaheim Project Section Draft Environmental Impact Report/Environmental Impact Statement ("EIR/EIS") for the California High-Speed Rail ("HSR") System* (California High-Speed Rail Authority, December 2025). Our comments are provided in the attached table.

1479

It is noted that the City's review was significantly constrained by the structure of EIR/EIS analysis. The vast majority of the environmental analyses are found in the Environmental Consequences sections, under Shared Passenger Track Alternative A ("Alternative A").[1] With certain exceptions (i.e., lists in tables and some impact call-outs identified by city), the Environmental Consequences sections, under Alternative A do not provide city- or site-specific detail that would allow ease of access to the applicable environmental impacts and potentially applicable mitigation measures to Fullerton. Similarly, the Fullerton HSR Station Option ("Station Option") environmental analyses typically refer the reader to the Alternative A analyses, again with some exceptions (i.e., lists in tables and some impact call-outs identified by city). Because Fullerton's impacts are not readily discernable, identifying them in order to conduct a meaningful review requires significant effort/hunting through the Environmental Consequences sections and volumes of drawings; see also Section 3.1 Comment below.

Should you have any questions, please feel free to contact Chris Schaefer, Planning Manager, at 714) 738-6884 or chris.schaefer@cityoffullerton.com.

Sincerely,

Sunaya Thomas
Director of Community and Economic Development

Att: City of Fullerton Comments table with attachments A & B

[1]Shared Passenger Track Alternative B would be similar to Alternative A in all aspects except size and location of light maintenance facility (LMF), which would involve improvements outside of Fullerton (i.e., at Hobart Yard in the City of Los Angeles).

CITY OF FULLERTON COMMENTS		
CHAPTER/SECTION	**PAGE**	**COMMENT**
CHAPTER 2: ALTERNATIVES		
1480 **Section 2.6.1: No Project Alternative**	2-41 (A)	As noted on this page, NEPA requires the evaluation of a no action alternative in an EIS (64 *Federal Register* 28546, § 14) and CEQA requires that an EIR include the evaluation of a no project alternative (State CEQA Guidelines § 15126.6(e)). As noted in our July 8, 2025, comment letter, it is our understanding that, at the January 26, 2024, Board of Directors meeting, Metrolink obtained approval to execute a work order with BNSF for 30% Preliminary Design Services to advance the Interlocker project. In that same agenda report, there was discussion on agreements between CHSR Authority, Metrolink, and Southern California Regional Rail Authority (SCRRA), that SCRRA would lead the environmental clearance (i.e., lead agency) for the Interlocker. The report also suggested SCRRA executed a contract with an environmental consultant in October 2023. Although the City of Fullerton ("City") received environmental memos[1] for review on June 4, 2025, these merely identify potential environmental constraints and opportunities, and did not analyze the Interlocker's impacts at the Fullerton Metrolink/Amtrak Station ("Fullerton Station) or to the City pursuant to CEQA or NEPA. The SCRRA's environmental consultant never engaged the City to discuss the Interlocker's potential impacts to Fullerton or recommended mitigation to avoid/lessen impacts. Instead, and without any opportunity for Fullerton to collaborate, as is evidenced by this EIR, the Interlocker's environmental clearance strategy changed, with the CHSR Authority serving as lead agency under CEQA and NEPA and the Interlocker being incorporated into the Shared Passenger Track Alternatives ("Alternatives") and thus analyzed in the EIR/EIS.[2] The EIR/EIS also identifies the Interlocker as an "Early Action Project," which may be implemented by other local agencies as stand-alone projects in advance of the HSR system, relying on the EIR/EIS for clearance (page 2-142 to 2-144). There is a high likelihood of this occurring given future funding for the HSR system is at risk since the Federal Railroad Administration's recent termination of funding agreements with the CHSR Authority. However, as discussed in page 2-142 Comment below, the Interlocker's impacts are not discernable/identifiable within the EIR/EIS and the City has not been provided ease of access to the applicable environmental analyses for their review. State CEQA Guidelines § 15126.6: Consideration and Discussion of Alternatives to the Proposed Project specifies that the purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Moreover, CA Pub Res Code § 21189.80 (b) specifies that CEQA "guarantees the public an opportunity to review and comment on the environmental impacts of a project and to participate meaningfully in the development of mitigation measures for potentially significant environmental impacts." For the reasons discussed above (i.e., the Interlocker may be implemented in advance of the HSR project,

[1] Air Quality, Greenhouse Gas, and Health Risk Assessment Approach and Recommendations (Appendix A); Biological Constraints Analysis (Appendix B); Cultural Resources Constraints Analysis (Appendix C); Paleontological Resources Constraints Analysis (Appendix D); Phase I Corridor Environmental Site Assessment (Appendix E); Preliminary Drainage Technical Memorandum (Appendix F); Preliminary Water Quality Assessment Report (Appendix G); Noise and Vibration Technical Report (Appendix H); and Transportation/Traffic Construction Impact Evaluation (Appendix I))

[2] EIR/EIS page 2-143: *"The Authority has incorporated the Fullerton Interlocker Project design as part of HSR's Fullerton/Metrolink Amtrak modifications, based on coordination with BNSF and Metrolink and on the anticipated timelines of the two projects. Therefore, the Draft EIR/EIS analyzes environmental impacts associated with the Fullerton Interlocker Project and the environmental impacts associated with the fourth mainline track that would need to be added to accommodate HSR service."*

CITY OF FULLERTON COMMENTS			
	CHAPTER/SECTION	PAGE	COMMENT
1480			the City has not been provided any opportunity for collaboration on the Interlocker, and the Interlocker's impacts are not discernable/identifiable in the EIR/EIS), the EIR/EIS should also include a No Project Alternative Plus Interlocker Alternative to provide Fullerton with an opportunity to review and comment on the Interlocker's environmental impacts and participate meaningfully in the development of mitigation measures for potentially significant environmental impacts.
1481		2-41 (B)	As previously noted, the EIR/EIS identifies the Interlocker as an "Early Action Project," which may be implemented by other local agencies as stand-alone projects in advance of the HSR system. The proposed Interlocker would potentially introduce substantial environmental impact to residents, specifically those who reside at the SOCO Walk, south of Walnut Avenue, east of Harbor Boulevard. As mentioned above, the Interlocker's impacts are not discernable/identifiable within the EIR/EIS, and the City has not been provided ease of access to the applicable environmental analyses for their review. Therefore, whether through a new No Project Alternative, or through separate EIR review as a stand-alone project by another local agency. The environmental review must also evaluate cumulative and indirect effects of related infrastructure and station-area development to ensure a coordinated and legally adequate process. As required by CEQA, the City requests that project-specific technical studies be conducted to evaluate noise, vibration, air quality, visual impacts, habitat disruption, and transportation. All necessary MM should be identified and incorporated into preliminary design prior to environmental clearance. Given the scale of the project and its potential to change station operations, access, and land use patterns, a full, independent CEQA review is warranted, separate from any HSR program-level documentation.
1482		2-41 (C)	If the Interlocker proceeds as a stand-alone project in advance of the HSR system improvements (see page 2-163 Comment below), the Fullerton Station and City would experience interruptions and most of the Interlocker's construction-related impacts consecutively- that is the Interlocker's impacts first, and then later at an unspecified time (see page 2-163 Comment), the HSR system improvements' impacts (i.e., when the southern track would be extended west past Highland Avenue to connect to the HSR alternatives' fourth mainline track). This is highly likely given the uncertainty of CHSR implementation, as discussed above. The consecutive and extended duration of interruptions to station operations and construction impacts are not addressed in the EIR/EIS.
1483	**Impact Avoidance and Minimization Features (IAMFs)**	2-60	Each build alternative incorporates standardized HSR features (i.e., IAMFs), which are standard practices and design features that provide specific means to avoid and reduce impacts. Under CEQA, IAMFs are acceptable, but they must be sufficiently defined, enforceable, and committed. In many instances, the IAMF's effectiveness is questionable, as the IAMF is written. For example, the IAMF may not include the necessary input by the local agency (i.e., Fullerton) or the correct milestone for implementation. Also, many IAMFs defer critical decisions to future contractors. Therefore, some IAMFs are inadequate as written, and because the consequences analyses factor in the IAMFs, those consequences analyses may also be inadequate, and potentially necessary MM may not be identified. Finally, the EIR/EIS relies heavily on IAMFs instead of project specific mitigation. The EIR/EIS must correct these deficiencies. **Attachment A: Comments on IAMFs** presents Fullerton's additional comments on the IAMFs.
1484	**Fullerton Municipal Airport**	2-82	This page states that the shared tracks on the northern side of the corridor would transition to the southern side to serve the existing Fullerton Station. The Alternatives proposed shared tracks would make the transition via a below-grade section, in a braced trench near the Fullerton Municipal Airport. The EIR/EIS addresses impacts to

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1484			construction workers (page 3.11-97) but does not provide a separate analysis for construction impacts to Fullerton Airport due to the proposed adjacent trenching/tunnelling. Deep trenching near an airport can cause geotechnical impacts (i.e., ground settlement, cracking, or structural damage to airport pavement and buildings) and safety hazards (i.e., from displaced soil/debris affecting runways and aircraft (engine ingestion), disrupting air navigation systems (NAVAIDs), and interfering with underground utilities). The EIR/EIS does not analyze these potential impacts in the various resource area sections (i.e., 3.6 Public Utilities, 3.9 Geology, 3.10 Hazardous Materials, 3.11 Safety and Security, and 3.13 Station Planning, Land Use. Moreover, the EIR's respective Laws, Regulations, and Orders section do not mention FAA's required strict compliance via a Construction Safety and Phasing Plan (CSPP). A CSPP would identify requirements for construction activities adjacent to the airport, focusing on protecting aviation safety by managing hazards from material storage, vehicle movements (haul roads), worker access, and potential Foreign Object Debris (FOD) to ensure minimal impact on active runways, taxiways, and airspace. It details specific safety measures, access controls, marking/signage, and operational adjustments to mitigate risks, guided by FAA Advisory Circular 150/5370-2G.
1485			Per the EIR/EIS, construction staging areas would be at or near the western and eastern ends of the trench area and would total approximately 2.5 acres. The soil and rock materials generated in excavation for this braced trench would need to be stockpiled to allow water-laden excavated material to dry without impeding construction progress because of limited construction area. The EIR does not provide any further information on construction duration in this area or if construction operations would require modifying or restricting airport operations. For example, if excavators for digging or cranes for placing precast bridges and constructing soldier piles would interfere with the runway protection zone, restrict airport operations. Tall construction equipment used to construct the braced trench must be analyzed for potential to interfere with the Airport's FAA established height limitation.
1486			A sump would be located at the low point within the trench alignment to collect groundwater seepage and stormwater inflows into the completed trench. No evaluation that addressed groundwater seepage (i.e., permanent dewatering and related impacts) was provided in the Hydrology Section. It also did not address construction dewatering at the trench location. While the groundwater depths near the airport are unknown, the EIR/EIS mentioned that "water-laden excavated material" was expected to be generated from the trench excavation. If soil or groundwater is contaminated near the airport at the trench location, then managing soil excavation and groundwater removal should also be addressed in the Hazardous Materials Section. There is some mention of this on page 3.10-45, but the identification and analysis of impacts at the airport/trench location brief and not as thorough as is for the Fullerton Station. A technical study that specifically addresses the construction-related and operational impacts to Fullerton Airport facilities and operations is needed. The EIR/EIS should be revised to provide separate analyses of impacts to Fullerton Airport, as well as identify the applicable IAMFs, and then recommend MMs, as needed.
1487	**Fullerton Metrolink/Amtrak Station Modifications**	2-109 (A)	This page states that a new railroad bridge would be built over Highland Avenue to accommodate the new shared track, which requires Walnut Avenue to be slightly realigned to the south, and the Walnut Avenue at Highland

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1487			Avenue intersection would need to be reconfigured. Walnut Avenue is identified as having Class II bike lanes in the City's Bike Master Plan. The City requests that a 6-foot bike lane be accommodated in both directions and that associated impacts be identified. In addition, on-street parking is proposed to be removed on the southside of Walnut Avenue between Harbor Boulevard and Lemon Street. Parking in the area is heavily utilized; therefore, the City requests that parking replacement strategies be incorporated into the plan for the City's review and consideration. The 6-foot bike lane and replacement parking should be identified in Chapter 2 and their associated impacts evaluated in Section 3.2: Transportation. Also, consistency with the Bike Master Plan and loss of parking on the south side of Walnut Avenue are not analyzed in Section 3.2.
1488	**Proposed Pedestrian Connection To Harbor Boulevard**	2-109 (B)	There is an existing connection to the north platform from Harbor Boulevard, however, a new connection is being proposed to the south, off Walnut Avenue. This page states that south of the new Metrolink/Amtrak center platform, sidewalk improvements and crosswalks would be added east of Harbor Boulevard to improve station connectivity to the neighborhood. However, no further details regarding the proposed pedestrian connection to Harbor Boulevard are provided. Please provide more information on the proposed connection. The City requests that all long-term maintenance roles and responsibilities be defined early on. Any additional burden to the City shall require predetermined relief (funding, resources, etc.)
1489	**Site Specific Detail Missing**	2-142	As previously noted, the Interlocker was incorporated into the "Alternatives" and thus analyzed in the EIR/EIS. The Interlocker was also identified as an "Early Action Project," which may be implemented by other local agencies relying on the EIR/EIS in advance of the HSR system as stand-alone projects. EIR/EIS page 2-142 states "potential early action projects relevant to this project section are described in further detail below, and are analyzed in site-specific detail within this Draft EIR/EIS to allow the agencies ease of access to the applicable environmental analyses and potentially applicable mitigation measures." Although the EIR/EIS alleges that it provides site-specific detail- it does not. While the EIR/EIS does provide extensive consequences analyses of the Alternatives because the Interlocker has been "bundled" into such analyses (i.e., has not been analyzed in site-specific detail), the Interlocker's impacts are not discernable/identifiable within the EIR/EIS, and the City has not been provided ease of access to the applicable environmental analyses for their review. While the "Mitigation Measures" respective sections do include an "Early Action Projects" subsection (e.g., Section 3.2.7.9), in most instances, the MMs applicable to the early action project (i.e., Interlocker) are not identified; see also page 3.2-146 Comment below. As such, the applicable mitigation measures (MM) and their effectiveness in avoiding or mitigating the interlocker's a consequences/impacts are unknown and not readily accessible. Similarly, the impact avoidance and minimization features (IAMF) that would be included in the Interlocker are not discernable/identifiable. Thus, it is unknown which IAMF can be factored into the Interlocker's impact analyses. As previously noted, CA Pub Res Code § 21189.80 (b) specifies that CEQA "guarantees the public an opportunity to review and comment on the environmental impacts of a project and to participate meaningfully in the development of mitigation measures for potentially significant environmental impacts." However, the Interlocker's IAMFs, analysis of consequences, and applicable mitigation measures have been generally "hidden" depriving Fullerton of an opportunity to review and comment on the Interlocker's environmental impacts and participate meaningfully in the development of mitigation measures for potentially significant environmental impacts.

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1489			Therefore, the EIR/EIS should be revised to "de-bundle" the Interlocker and analyze it in site-specific detail as stated it would.
1490	**High-Speed Rail Station Option: Fullerton**	2-147 to 2-151	This Fullerton Station Option would add HSR station buildings, a facility power substation, and a new 570-space multilevel parking structure. This Fullerton Station Option requires significantly greater infrastructure and facilities in the Fullerton Station area, including many station-related investments along Walnut Avenue, with potential for neighborhood impact that the EIR/EIS proposes be addressed through onsite investments in parking and drop-off/pick-up zones, as well as transit connectivity planning. An additional 4.19 acres of land would be acquired and converted to transportation uses, in an area zoned for Industrial use. CHSRA maintains a position that there would be no substantial change in land use patterns, with or without the optional station. However, as previously noted, the Fullerton Station Option environmental analyses typically refer the reader to the Alternative A analyses, with limited exceptions (i.e., impact call-outs to City). Moreover, although the Fullerton Station Option materially increases impacts in almost all resource areas compared to Alternative A alone, the Fullerton Station Option analyses do not identify the additional mitigation that would be triggered by the greater impacts. Therefore, these deficiencies must be addressed in each respective EIR/EIS section. Generally, the City faces short-term construction and long term operational impacts (e.g., maintenance obligations) without firm funding, enforceable commitments, or design guarantees. Therefore, the City requests adequate annual funding to maintain the new improvements, to be determined once the final design has been approved. It is noted that page 3.13-65 refers to up to 1,114 spaces being provided under the Fullerton Station Option, which would conflict with the 570 spaces noted above. Please clarify this inconsistency.
1491	**Construction Plan and Phased Implementation Strategy**	2-163	This page notes that Fullerton Station modifications would be built in Phase 8, and if the Fullerton Station Option is selected, the HSR Option's station platform and facilities would be built also. However, EIR/EIS Table 2-19 page 2-164 notes that the construction schedule for the "Fullerton HSR/Metrolink Station" is January 2033 to June 2035, which is assumed to refer to the Fullerton Station Option. However, Table 2-19 is silent on the construction schedule for the Alternative A Fullerton Station modifications. There is further confusion in that EIR/EIS Table 2-19 Footnote 2 states "Construction schedule for Norwalk/Santa Fe Springs and Fullerton Stations dependent on whether the HSR station option is included" although it was previously stated the construction schedule for the "Fullerton HSR/Metrolink Station" is January 2033 to June 2035. Therefore, the EIR/EIS should clarify the construction schedules, including durations for Alternative A and the Fullerton Station Option assumed in the EIR/EIS.
1492	**Preconstruction Surveys**	2-165	The EIR/EIS states that during final design, the Authority and its contractor would conduct a number of preconstruction activities to determine how best actual construction should be staged and managed, identifying geotechnical investigations, among others. Conducting Phase I/2 Environmental Site Assessments of both the temporary and permanent footprints should be added to this list.
1493	**Preconstruction Activity, Batch Plant**	2-166	The EIR/EIS identifies "Locating temporary batch plants to produce Portland Cement concrete or asphaltic concrete needed for roads, bridges, aerial structures, retaining walls, and other large structures" as a preconstruction activity. However, the proposed locations of the temporary batch plants are not identified in Chapter 2 and their

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1493			impacts (e.g., air quality, noise, water quality) are not evaluated in Chapter 3. Additionally, this page notes: "The contractor would implement procedures for reducing air emissions, mitigating noise effects, and reducing the discharge of potential pollutants into storm drains or watercourses from the use of equipment, materials, and waste products." However, these measures are not enforceable unless they are identified as an IAMF or MM, and as previously stated, Chapter 3 does not analyze the temporary batch plants. Therefore, the EIR/EIS should be revised to include batch plant descriptions, impact analysis, IAMFs, and MMs.
1494	**Temporary Rail Improvements During Construction**	2-168	The EIR/EIS states that "In many areas where linear construction is occurring (i.e., construction of mainline tracks), the existing railroad right-of-way could be used to stage construction." However, the EIR/EIS is silent on how train traffic within the corridor would be handled during this, or even construction of the entire line. For example, is it assumed that a shoofly track will be used temporarily to divert trains around a construction site? If so, these temporary rail improvements (or others) are not identified and their impacts not evaluated. Therefore, the EIR/EIS should be revised to include temporary rail improvement descriptions, impact analysis, IAMFs, and MMs.
	CHAPTER 3.0: AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES, AND MITIGATION MEASURES		
1495	**Section 3.1.5.6: Environmental Consequences**	3.1-13	CA Pub Res Code § 21189.80 (b) specifies that CEQA "guarantees the public an opportunity to review and comment on the environmental impacts of a project and to participate meaningfully in the development of mitigation measures for potentially significant environmental impacts." However, the vast majority of the environmental analyses are generic and found in the respective Environmental Consequences sections, under Alternative A. With some exceptions (i.e., lists in tables and some impact call-outs by city), the Environmental Consequences sections, under Alternative A, does not provide city or site-specific detail that would allow Fullerton ease of access to the applicable environmental impacts and potentially applicable mitigation measures. Also, enforcement of many MM relies heavily on state agencies, not on Fullerton. Similarly, the Fullerton Station Option analyses typically refer the reader to the Alternative A analyses, again with some exceptions (i.e., impact call-outs to City). Generally, Fullerton's impacts are not readily discernable, and identifying them to conduct a meaningful review requires significant effort/hunting through the Environmental Consequences sections and volumes of drawings. Pub Res Code § 21189.80 (b) specifies that CEQA "guarantees the public an opportunity to review and comment on the environmental impacts of a project and to participate meaningfully in the development of mitigation measures for potentially significant environmental impacts." For the reasons discussed above (i.e., the impacts to Fullerton are not discernable/identifiable in the EIR/EIS), the EIR/EIS should be revised to include a table that summarizes the impacts to Fullerton, for each resource area, as well as the applicable IAMFs and MMs.
	SECTION 3.2: TRANSPORTATION		
	IAMFs	3.2-32	See **Attachment A** for City comments. Note, this comment is typical for Sections 3.3 through 19, 4.0, and 5.0.
1496		3.2-73	Table 3.2-20 Temporary Construction Roadway Closures identifies the following Fullerton roadways that would experience temporary construction-related traffic effects from lane closures, road closures, and detours: Dale St and Artesia Ave, Commonwealth Ave, Euclid St, Highland Ave, Walnut Ave, and Harbor Blvd. However, Dale St should be revised to Gilbert St.
1497		3.2-87	This page states the following Fullerton transit lines would be affected:

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1497			• New bridge at SR 39 (Beach Boulevard): OCTA 29, 29A; Metro 460 • Fullerton braced trench (Artesia Boulevard, Dale Street): OCTA 29A, 123 • New railroad bridge at Commonwealth Avenue: OCTA 26 • New railroad bridge at Euclid Street: OCTA 37 • Fullerton Metrolink/Amtrak Station modifications (Highland Avenue, Walnut Avenue, Harbor Boulevard): OCTA 43, 543, 123, 47 However, the Fullerton Metrolink/Amtrak Station modifications list (i.e., 5th bullet) is missing Santa Fe Ave and Pomona Ave. Therefore, impacts to these facilities were omitted from the EIR/EIS analyses.
1498		3.2-118	This page states that to maintain pedestrian and bicycle access at the station area, project design plans will include specifications for vehicle lanes, passenger loading zones, sidewalks, crosswalks, bike lanes, trails, bus stops, parking, and intersection controls (TR-IAMF#12). However, the pedestrian tunnel on the north and the proposed extension of the fourth track to the south, both eliminate public parking spaces. Parking in the area is heavily utilized; therefore, the City requests that parking replacement strategies be incorporated into the plan for the City's review and consideration.
1499		3.2-119	This page states "the Fullerton HSR Station Option would generate approximately 283 nonmotorized (i.e., bicycles and pedestrians) trips during peak hours in Horizon Year 2040, which would increase the number of pedestrians and bicyclists using the sidewalks and bicycle facilities in the vicinity of the station. The Fullerton HSR Station Option would provide facilities on site to support these additional trips." However, as previously mentioned in page 2-109 Comment, Walnut Avenue is identified as having Class II bike lanes in the City's Bike Master Plan. The City requests that a 6-foot bike lane be accommodated in both directions and that associated impacts be identified. In addition, on-street parking is proposed to be removed on the southside of Walnut Avenue between Harbor Boulevard and Lemon Street. Also, see page 3.2-57 Comment for the existing bikeway facilities that provide access to the Fullerton Station area. Given the anticipated increase in ridership, the need to discuss impacts to these facilities is further underscored. Also, consistency with the Bike Master Plan is not analyzed.
1500		3.2-146	This page states that "none of the early action projects that are a part of the Shared Passenger Track Alternatives would result in significant impacts that would require mitigation measures." However, because the Interlocker is assumed in the Alternatives, then all impacts and MM identified for Alternative A would also apply to the Interlocker; see also page 2-41 Comments. Therefore, the EIR/EIS must be revised globally to correct this error.
	SECTION 3.3: AIR QUALITY AND GLOBAL CLIMATE CHANGE		
1501	**Deficiencies Related to Disadvantaged Communities**	General	There are significant flaws in the Draft EIR/EIS Air Quality analysis concerning the loss of operational capacity at the Fullerton Station, and the air quality and community impacts to SB 535–designated disadvantaged communities immediately south of Truslow Avenue. These deficiencies undermine the adequacy of the CEQA analysis, which must be based on an accurate, stable, and finite project description and baseline, and must meaningfully assess the severity and distribution of impacts across affected neighborhoods, including vulnerable populations.
1502	**Failure to Analyze How Reduced Rail System Capacity in Fullerton**		During HSR construction, the corridor will experience lane closures and transportation detours, heavy equipment emissions, construction-related locomotive movements, and reduced roadway capacity in and around the

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1502 **Compounds CAHSR Construction Impacts in the Downtown Corridor**		Fullerton Station area. However, the EIR/EIS does not analyze how the reduction in operational capacity at the Fullerton Station from Alternative A and the Fullerton Option limit the City's ability to manage and mitigate these construction impacts. With platform length curtailed and switching flexibility reduced, the City and rail operators lose the ability to: • Stage trains away from sensitive receptors, • Re-route services to relieve congestion, • Maintain service frequencies that prevent crowding and extended bus-bridge operations, and • Manage locomotive idling in ways that reduce localized emissions. 1503 The Air Quality analysis treats each project segment as though the baseline Fullerton facility is fully functional and unconstrained, ignoring that the Alternatives materially reduce operational resilience precisely when HSR construction introduces significant temporary emissions, traffic congestion, and mobility disruptions. This omission violates CEQA's requirement to evaluate "the whole of an action" (See State CEQA Guidelines, § 15378(c); Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal. 3d 376, *394-*396) and fails to account for known limitations that directly affect the severity of anticipated impacts.
1504 **Disproportionate Impacts to SB 535–Designated Disadvantaged Communities Are Not Adequately Addressed**		CEQA requires the evaluation of disproportionately high and adverse impacts on disadvantaged communities, including: • State CEQA Guidelines § 15126.2(d): Identification of significant environmental effects on disadvantaged communities • State CEQA Guidelines § 15130: Analysis of cumulative impacts, which is particularly critical for areas already experiencing high pollution burdens • State CEQA Guidelines § 15131: Assessment of how project impacts affect human communities, including social and economic conditions when related to environmental effects Immediately south of the Fullerton Station, particularly the neighborhoods adjacent to Truslow Avenue, are SB 535–designated disadvantaged communities with high proportions of transit-dependent residents, elevated baseline environmental burdens, and increased respiratory vulnerability. Because these communities rely heavily on the Fullerton Station for daily mobility, reductions in station capacity and degraded service reliability disproportionately impact these populations. However, the Draft EIR/EIS fails to: • Evaluate how extended locomotive idling near these communities increases diesel particulate matter (DPM) burden; • Assess how the loss of platform capacity will lead to prolonged construction-period transit delays, which extend the duration of exposure to traffic-related air pollutants for bus riders waiting at or near the station; • Address how transit rerouting or degraded station operations will force transit-dependent residents to travel farther or wait longer in areas with higher pollutant concentrations;

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1504			• Incorporate the cumulative effects of CAHSR construction activities on top of already-elevated CalEnviroScreen vulnerability scores in this specific neighborhood. Given the sensitivity of SB 535 communities, CEQA requires a more nuanced and spatially specific analysis. Instead, the EIR's generalized air quality discussion glosses over the fact that these neighborhoods will experience both elevated emissions and reduced transit reliability, compounding the severity and duration of impacts on already overburdened households. These deficiencies violate CEQA's requirement for a thorough evaluation of effects on vulnerable populations.
1505	**The EIR/EIS Fails to Analyze Mitigation Feasibility Given Reduced Operational Flexibility at the Fullerton Transportation Center**		CEQA requires not only the identification of impacts but also an evaluation of feasible mitigation measures (State CEQA Guidelines § 15126.4) and to make findings supported by substantial evidence demonstrating why mitigation is infeasible (§15091(a)). Yet because the Air Quality analysis assumes a fully functional baseline station, and ignores the capacity loss from the Alternatives, the EIR/EIS never evaluates: • Whether mitigation measures become infeasible due to lack of platform space, • Whether the City's constrained operational environment prevents effective implementation of air quality best practices, • Whether staging or temporary operational modifications intended to reduce emissions are logistically impossible, • Whether buses or rail services can be shifted or expanded to reduce pollution exposure in disadvantaged communities. Because the EIR/EIS ignores the loss of operational and platform capacity, it also ignores how these constraints limit mitigation feasibility, including the inability to relocate idling trains away from disadvantaged residential areas; reduced capacity for alternative train staging or metering; elimination of mitigation options requiring use of space no longer available; and limits on bus bridging or transit service alternatives due to platform reduction. As the EIR/EIS never discloses these constraints, it never evaluates whether key air quality mitigation measures are feasible, violating CEQA's requirements for both analysis and findings. This omission deprives decision-makers and the public of critical information necessary to assess the full severity of impacts and the feasibility of mitigation, undermining CEQA's informational purpose (State CEQA Guidelines § 15121).
1506	**Required Corrections**		The EIR/EIS fails to provide an adequate CEQA Air Quality analysis for Fullerton because it does not adequately analyze how the Alternatives' operational constraints compound HSR construction impacts, particularly within SB 535–designated disadvantaged communities south of Truslow Avenue. To comply with CEQA, the Air Quality analysis must be revised to: 1. Reevaluate air quality impacts with realistic assumptions about lost operational flexibility and increased locomotive idling (State CEQA Guidelines §§ 15126.2(a) and 15064(b)). 2. Conduct a focused environmental justice assessment of the SB 535 communities adjacent to the project (State CEQA Guidelines §15126.2(d); Public Resources Code § 21099).

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1506		3. Reassess mitigation feasibility in light of reduced platform and operational capacity (State CEQA Guidelines §§ 15126.4(a) and 15091(a)). 4. Revise cumulative impacts (State CEQA Guidelines § 15130) to reflect compounded burdens on transit-dependent residents. The Air Quality section fails to satisfy CEQA's core analytical and informational requirements. The failure to assess disproportionate impacts on SB 535 disadvantaged communities constitute significant deficiencies requiring full recirculation under State CEQA Guidelines § 15088.5. Without these corrections, the Air Quality analysis remains legally inadequate under CEQA and fails to disclose the true scope and severity of the project's impacts on the City of Fullerton and its most vulnerable residents.
SECTION 3.4: NOISE AND VIBRATION		
1507		The Noise and Vibration section includes significant analytical deficiencies, omissions, and unsupported assumptions as they pertain to Fullerton. Under State CEQA Guidelines §§ 15003, 15126, 15151, and 15125, an EIR must provide a good-faith, reasoned, factually supported analysis of environmental impacts based on an accurate and stable description of existing baseline conditions. The Draft EIR/EIS fails to meet this standard because it does not adequately account for the loss of operational capacity at the Fullerton Station, and the unique vulnerability of nearby disadvantaged residential areas, especially those immediately south of Truslow Avenue. The Authority's failure to analyze these reasonably foreseeable noise and vibration sources violates State CEQA Guidelines §15144 (requirement to use the best information reasonably available), §15126.2(a) (requirement to analyze direct and indirect impacts), and §15064(b) (requirement to consider context that elevates impact severity). The analysis presented in the EIR/EIS is inadequate because it fails to provide a factually supported and comprehensive assessment of noise and vibration impacts as required by CEQA. By neglecting the real-world operational constraints imposed by the Alternatives, disregarding the loss of platform capacity, and omitting the resulting increase in high-noise and high-vibration events, the EIR/EIS does not address reasonably foreseeable impacts. This omission undermines the reliability and legal sufficiency of the environmental review, as it neither uses the best available information nor addresses the direct, indirect, and cumulative effects on sensitive receptors as mandated by CEQA. Therefore, the Draft EIR/EIS does not meet the standard of analysis necessary for informed decision-making and public disclosure under state law.
1508	**EIR Fails to Analyze How Baseline Constraints Elevate Noise and Vibration.**	Because Fullerton's track and platform geometry will be more constrained after Alternatives' implementation, horns, bells, braking, coupling/uncoupling, and idling periods all increase. These are all well-known high-decibel and high-vibration events under FRA/FTA modeling protocols. Yet: • No supplementary modeling was applied; • No additional source-path-receiver analysis was conducted; • No vibration propagation modeling was performed in the constrained station throat.

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1508		This omission directly contradicts State CEQA Guidelines §§ 15144–15145, requiring use of the best information reasonably available and disclosure of analytical uncertainty. The Draft EIR/EIS's failure to incorporate the operational constraints introduced by the Alternatives (increased frequency and duration of high-decibel and high-vibration events such as horns, bells, braking, coupling/uncoupling, and locomotive idling) represents a fundamental analytical gap. The omission of supplementary noise and vibration modeling, source-path-receiver analysis, and vibration propagation modeling in the uniquely constrained station environment directly contradicts CEQA's requirements to use the best available information and to fully disclose analytical uncertainties. Without addressing these deficiencies, the EIR/EIS does not provide a reliable or legally adequate assessment of noise and vibration impacts in Fullerton. As a result, the document fails to inform decision-makers and the public of the true scope and severity of environmental effects, undermining the integrity of the environmental review process and compliance with state law.
1509 **Reduced Operational Capacity Limits Fullerton's Ability to Mitigate Construction Noise and Vibration.**		Fullerton's constrained station configuration will prevent the City and service operators from undertaking standard mitigation measures such as rerouting trains away from sensitive receptors; staging trains farther from residences; maintaining normal headways to avoid backups; preventing prolonged nighttime idling. However, none of these limitations are analyzed as part of the construction noise and vibration impacts, even though CEQA requires evaluating "indirect" and "reasonably foreseeable" impacts (Guidelines § 15064(d)). The EIR/EIS ignores that Mitigation Measures N&V-MM#3 and N&V-MM#4 are not feasible in downtown Fullerton. Specifically, these unaddressed fatal flaws include: • The lack of physical space for standard sound walls in the station throat. • The EIR/EIS includes no engineering feasibility study for sound walls in Fullerton. • Vibration mitigation (floating slabs, ballast mats) may not be installable in a multi-operator, tight-geometry shared corridor. • Sound insulation does nothing to resolve exterior noise, the metric CEQA uses for significance. • Noise easements are listed, but not evaluated for their applicability or legality. 1510 The EIR/EIS falls short of meeting CEQA's requirements for a factually supported and comprehensive assessment of noise and vibration impacts. The document fails to account for the operational and construction-related constraints imposed by the Alternatives, omits analysis of cumulative and disproportionate effects on sensitive receptors, and neglects to evaluate how the constrained station environment limits effective mitigation measures. Without addressing these deficiencies, particularly the inability to implement standard mitigation strategies such as rerouting trains, staging farther from residences, and preventing prolonged idling, the EIR/EIS does not provide decision-makers or the public with a reliable understanding of the true scope and severity of environmental impacts. Consequently, the environmental review lacks the integrity and legal sufficiency required under state law, undermining informed decision-making and public disclosure.

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1511 **Construction Noise and Vibration Impacts Will be Significantly Worse Because of the Alternatives'-Induced Constraints.**		The Project will cause heavy nighttime utility and track work, pile-driving and excavation in constrained spaces, train rerouting and bussing operations that create additional noise near sensitive receptors. Because Fullerton's station area cannot absorb or redistribute train movements efficiently, these impacts compound, contrary to the EIR/EIS' assumption that mitigation can be implemented uniformly along the corridor. The EIR/EIS must provide a thorough and factually supported analysis of construction noise and vibration impacts in Fullerton, specifically accounting for the operational constraints that prevent standard mitigation measures. The document must not assume that mitigation can be uniformly implemented along the corridor but instead address the unique impacts created by the station's limited capacity to reroute or stage trains. To comply with CEQA requirements, the EIR/EIS should include a cumulative impact analysis as mandated by State CEQA Guidelines §15130, conduct an engineering feasibility study for mitigation options, and transparently evaluate the disproportionate effects on sensitive receptors. Only by addressing these deficiencies can the EIR/EIS enable informed decision-making, ensure public disclosure, and uphold the integrity and legal sufficiency required under state law.
1512 **Failure to Address Disproportionate Impacts on Sensitive Receptors South of Truslow Avenue (CEQA §§15131, 15126.2(d))**		The residential neighborhoods south of Truslow Avenue contain transit-dependent households, include several CalEnviroScreen-qualifying environmental justice communities, are within 100–200 feet of the project alignment, directly facing the station throat. However, the Noise and Vibration analysis does not evaluate disproportionate impacts. State CEQA Guidelines §15126.2(d) requires consideration of effects on disadvantaged communities. Case law (King & Gardiner Farms v. County of Kern (2020) 45 Cal.App.5th 814) confirms that impacts on environmental justice populations must be analyzed where supported by evidence. The Draft EIR/EIS: • Fails to discuss how nighttime construction will extend exposure for residents who rely on early-morning transit; • Does not acknowledge that low-income renters cannot escape construction noise and vibration through relocation; • Does not address compounded stressors of train horn noise, locomotive idling, and construction vibration; • Does not analyze the startle effect, though FRA guidance requires it for HSR (see the High-Speed Ground Transportation Noise and Vibration Impact Assessment (FRA 2012), Section A.4, page A-13). The Draft EIR/EIS must be revised to provide a comprehensive, factually supported analysis of noise and vibration impacts for the residential neighborhoods south of Truslow Avenue, with particular attention to transit-dependent and environmental justice communities. Specifically, the document must:

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1512			• Individually evaluate disproportionate effects on sensitive receptors, including low-income renters and transit-dependent households, as required by State CEQA Guidelines §15126.2(d) and supporting case law. • Analyze the cumulative and compounded impacts of nighttime construction, train horn noise, locomotive idling, and construction vibration, and address the inability of affected residents to avoid these stressors. • Include assessment of the startle effect in accordance with FRA guidance for high-speed rail projects. • Provide transparent disclosure of how operational and construction constraints in the Fullerton station throat limit the effectiveness of standard mitigation measures. • Incorporate a cumulative impact analysis as mandated by State CEQA Guidelines §15130, ensuring that mitigation strategies are tailored to the unique conditions of the project area. By addressing these deficiencies, the EIR/EIS will enable informed decision-making, fulfill legal requirements under CEQA, and ensure meaningful public disclosure of the true scope and severity of environmental impacts on the most vulnerable communities.
1513	**Noise and Vibration Modeling Appears Incomplete for Truslow-Area Receptors.**		Multiple sensitive receptors (including schools, multifamily residences, child-centered land uses) exist within the Fullerton RSA but are not individually evaluated or even acknowledged in the impact tables. This omission violates CEQA's requirement for full disclosure (State CEQA Guidelines §15151) and Neighbors for Smart Rail v. Exposition Metro Line Authority (2013) 57 Cal.4th 439, which requires analysis where community-specific localized effects are reasonably foreseeable. The failure to individually identify and analyze sensitive receptors within the Fullerton RSA constitutes a significant gap in the EIR/EIS. This deficiency not only undermines the transparency and completeness required by CEQA, but also risks overlooking disproportionate impacts on vulnerable populations. Addressing this issue is essential for ensuring that environmental review is both thorough and equitable, and for upholding the legal standards established for community-specific impact assessment.
1514	**No Analysis of Cross-Jurisdictional Noise and Vibration Propagation**		Fullerton's boundary with Anaheim includes some of the most severely impacted multifamily buildings in the entire project (severe noise + severe vibration zones). The EIR/EIS does not evaluate propagation effects, even though noise and vibration does not respect jurisdictional lines. CEQA requires evaluation of impacts "on the environment of persons who reside or work in the vicinity" regardless of city boundaries (Guidelines §15126.2(a)). The EIR/EIS must comprehensively assess the cumulative and cross-jurisdictional impacts of noise and vibration, including those affecting severely impacted multifamily buildings at Fullerton's boundary with Anaheim. It is essential to evaluate propagation effects beyond city lines, as required by State CEQA Guidelines §15126.2(a), and to individually identify and analyze sensitive receptors within the Fullerton RSA. The EIR/EIS must be revised to address these deficiencies and to ensure transparency, compliance with legal standards, and meaningful protection for vulnerable communities.
1515	**No Modeling of How Constrained Track Geometry Amplifies Vibration**		High-speed, freight, and Metrolink coexist in the Fullerton throat. However, the EIR/EIS conducts no composite-frequency vibration modeling, which is required where multiple sources overlap (see FRA, High-Speed Ground Transportation Noise and Vibration Impact Assessment Manual, 2012, Chapter 9: Detailed Vibration Assessment,

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1515			and FTA, Transit Noise and Vibration Impact Assessment Manual, 2018, Chapter 7: Ground-Borne Vibration and Noise). The guidance specifies that in locations where new projects are in the same corridor as existing vibration sources (e.g., high-speed, freight, and Metrolink), the existing sources must be considered in the assessment. This level of modeling must use 1/3-octave band frequency analysis (composite-frequency) to account for the different frequency spectra generated by heavy freight locomotives versus lighter high-speed or commuter rail cars. The modeling must also use distinct vibration curves for each locomotive type (e.g., freight, Metrolink, high-speed passenger cars, etc.) because their vibration signatures differ significantly. For example, diesel and electric locomotives are often modeled using an upper-bound curve, while lighter passenger cars use a lower curve. The EIR/EIS must be revised to conduct a combined vibration analysis.
1516	**Mitigation (N&V-MM#3 and #4) Does Not Evaluate Feasibility in Downtown Fullerton**		The EIR assumes generic mitigation but ignores: • Limited ROW for sound walls; • Station-area utility conflicts; • Visual, seismic, and ADA constraints; • Inability to install tall barriers adjacent to switching plants; • Operational restrictions preventing special trackwork installation in constrained areas. CEQA prohibits deferring mitigation without performance standards (POET v. State Air Resources Board (2017) 12 Cal.App.5th 52). Here, mitigation feasibility is assumed, not demonstrated. The EIR/EIS must demonstrate the feasibility of proposed mitigation measures by addressing real-world constraints, including limited right-of-way, utility conflicts, visual and seismic limitations, ADA requirements, and operational restrictions, rather than assuming generic mitigation. The document should avoid deferring mitigation without clear performance standards and must revise its approach to comply with the State CEQA Guidelines and ensure meaningful protections for vulnerable communities.
1517	**No Analysis of Noise from Extended Idling and Queuing Caused by Alternatives Constraints**		Noise from slow-speed operations and idling is among the most intrusive and irritating sources, per FRA guidelines (FRA, High-Speed Ground Transportation Noise and Vibration Impact Assessment, 2012, Section 4.2.4 on page 4-13). The EIR/EIS simply does not evaluate this source category. The EIR/EIS must be revised to address noise from extended idling and queuing caused by the Alternatives' constraints.
1518	**No Analysis of Temporary or Permanent Bus Operations Noise During Station Disruption**		Fullerton will require bus bridging and local reroutes during multiple construction stages. However, no noise or vibration modeling was performed for bus layover zones or passenger pickup zones near Truslow Avenue. The EIR/EIS must be revised to address this deficiency.
1519	**CEQA Conclusions**		As detailed above, the EIR/EIR Noise and Vibration analysis uses an inaccurate baseline, ignores known operational constraints created by the Alternatives, fails to evaluate compounded construction impacts, fails to evaluate disproportionate impacts to environmental justice neighborhoods, omits significant noise and vibration sources, assumes mitigation feasibility without demonstrating it, and fails to disclose significant residual impacts. Therefore, the Noise and Vibration analysis violates State CEQA Guidelines §§ 15125(a) (baseline), 15126.2(a) (direct/indirect impacts), 15130 (cumulative impacts), 15126.2(d) (EJ/disadvantaged communities), 15151 (adequacy), 15064 (significance), and relevant case law (CBE v. SCAQMD, Neighbors for Smart Rail, King & Gardiner, POET, among

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1519			others). Under State CEQA Guidelines §15088.5, the magnitude of these deficiencies requires recirculation of the Noise and Vibration section.
	SECTION 3.5: ELECTROMAGNETIC INTERFERENCE AND ELECTROMAGNETIC FIELDS		
1520	**Exclusion of Fullerton Plans and Policies from Section 3.5 Regulatory Section**	3.5-10	Table 3.5-7 does not include any Fullerton plans or policies regarding electromagnetic or telecommunication facilities (e.g., Fullerton Municipal Code Chapter 15.53: Wireless Facilities in the Right of Way). The EIR/EIS should be revised to analyze and disclose conflicts with this Fullerton regulation.
1521	**No Analysis of Impacts on EMI-Sensitive Receptors Near Fullerton Paralleling Station**	3.5-21	Section 3.5.5.1 states "There are many occupied structures, including some residential uses, near the proposed locations for the TPSS facility, switching station, paralleling station facilities, and associated utility feeds. However, none of the facility locations would be within 100 feet of the nearest building, or within 300 feet of the nearest residential site. The analysis did not identify receptors with potentially sensitive equipment within 500 feet of the locations." However, a paralleling station facility is proposed at 4201 Artesia Avenue in the City of Fullerton, approximately 250 feet south of the nearest residential site and 150 feet north of the Fullerton Airport and other EMI sensitive receptors (e.g., dentist office, DNB Engineering). Further, the proposed Fullerton paralleling station facility, and the HSR corridor in general is bounded by land designated by the City of Fullerton as Industrial and zoned for General Manufacturing land uses which could potentially use EMI sensitive equipment. Section 3.5.5.1 then states "Absent such sensitive equipment close to these facilities, impacts are not to be expected. Although the EMF levels developed at or just outside of the fence line would in most cases exceed the prevailing ambient levels, they would not exceed the electric or magnetic MPE limits for occupational or general public exposure." The EIR/EIS must be revised to analyze and disclose impacts from proximity to the paralleling station and other EMI impacts on the existing and planned nearby EMI sensitive receptors.
1522	**Missing Analysis of EMI-Sensitive Receptors**	3.5-20	Section 3.5.5: Affected Environment does not identify the location of existing telecommunication facilities within the study area. Telecommunication facilities are also considered EMI sensitive uses and are assumed to be located throughout the project footprint. The EIR/EIS must be revised to analyze and disclose impacts on telecommunication facilities.
1523	**No Analysis of EMI Impacts to SCE Fullerton Substation**	3.5-10	Section 3.5.5.1: Local Conditions identifies substations in Los Angeles and Anaheim stations as sensitive receptors, but does not identify the SCE Fullerton Substation as a sensitive receptor, despite being located approximately 50-feet south of the HSR Alternative A Interlocker or Optional Fullerton HSR Station improvements at the Fullerton Metrolink Station. The EIR/EIS must be revised to analyze and disclose EMI impacts on the SCE Fullerton Substation.
1524		3.5-45	Section 3.5.7.3 Early Action Projects, states "None of the early action projects that are a part of the Shared Passenger Track Alternatives would result in significant impacts. The two sensitive receivers are far enough from the early action projects (one is over 700 feet, and one is 1,000 feet away) that equipment-specific impacts would not occur." As noted above, the SCE Fullerton Substation is located approximately 50-feet south of the Interlocker. The EIR/EIS must be revised to analyze and disclose EMI impacts from the Interlocker on the SCE Fullerton Substation.

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1525	**Missing Analysis of EMI Impacts to Fullerton Airport Underground Pipelines and Cables**	3.5-36	Impact EMF/EMI-6: Potential for Corrosion of Underground Pipelines, Cables, and Adjoining Rail, does not include any discussion of impacts regarding underground pipelines or cables associated with the Fullerton Airport.
	SECTION 3.6: PUBLIC UTILITIES AND ENERGY		
1526	**The Energy Analysis Does Not Comply With State CEQA Guidelines Appendix F and §15126.2(b) (Energy)**		The EIR/EIS's Energy section does not comply with State CEQA Guidelines Appendix F and §15126.2(b). Appendix F requires analysis of effects on local and regional energy supplies and requirements for additional capacity and effects on peak and base period demands for electricity. The EIR/EIS provides generalized statewide discussions but omits project level load modeling, peak/base tables, and transmission and distribution interconnection capacity evidence for the LADWP and Anaheim Public Utilities ties serving the Los Angeles TPSS/receiving station and the Anaheim TPSS, and it does not quantify station/light maintenance facility (LMF) peak loads (kW) or annual consumption (kWh), including for the Fullerton Station Option. Therefore, the conclusion that the Project "would not require substantial additional capacity and would not substantially increase peak and base period demand" is unsupported. See State CEQA Guidelines Appendix F; §15126.2(b). The Energy analysis also does not comply with the precedents established in California Clean Energy Committee v. City of Woodland (2014) 225 Cal.App.4th 173 and Ukiah Citizens for Safety First v. City of Ukiah (2016) 248 Cal.App.4th 256, which require a quantitative Appendix F energy analysis and reject reliance on generalized code compliance or GHG measures in lieu of project specific energy calculations and feasible mitigation. The EIR/EIS' reliance on proration from system wide energy totals, absence of traction peak profiles, and lack of feasible peak shaving/storage commitments fall short of these precedents.
1527			The Authority should revise and recirculate the Energy section with (1) corridor specific traction and station/LMF load modeling; (2) hourly peak/base and coincident peak analyses; (3) utility transmission and distribution interconnection capacity confirmations; (4) sensitivity analyses for low ridership and extreme heat peaks; and (5) enforceable energy mitigation (e.g., on site storage, dynamic power smoothing, time-of-use management, station PV + storage, high efficiency design, etc.). For the Fullerton Station Option, the EIR/EIS does not quantify station electrical loads or analyze local peak/base effects or utility capacity. Appendix F requires evaluation of local peak/base period demand. The EIR/EIS analysis must provide Fullerton specific demand tables (kW/kWh), utility confirmations, and, if needed, mitigation for any additional capacity or peak impacts. Given Fullerton's location near SCE/Anaheim boundaries and the Dale Street/Artesia Avenue paralleling station, the EIR/EIS should produce utility confirmations that no local capacity additions (or that specific upgrades) are needed. Without this, the finding of no substantial increase in peak/base demand in Fullerton is unsupported.
1528	**Fails to Identify Construction Water Availability and Relies on Deferred Mitigation and Environmental Analysis**	3.6-44	PUE MM#1 defers confirmation of water supply availability required for both construction and operational needs until 90% of the engineering design plans are finalized, prior to the anticipated commencement of construction.

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1528			Identifying the water supply and any related new water supply utility infrastructure is essential to properly assess and disclose impacts concerning the following State CEQA Guidelines Appendix G thresholds: • Impact PU&E-3: Effects from Water Demand During Construction • Impact PU&E-11: Operational Water Supply Demand State CEQA Guidelines Section 15126.2(a) requires an EIR identify and focus on the significant effects of the proposed project on the environment, including direct and indirect significant effects of the project on the environment, giving due consideration to both the short-term and long-term effects. By deferring confirmation of water supply availability, the EIR/EIS fails to disclose any impacts resulting from the construction and operation of any related new water supply utility infrastructure. Section 3.6.7.2: Impact of Mitigation highlights that expanding water delivery and wastewater conveyance facilities, if needed, may lead to secondary or off-site environmental impacts typically associated with utility upgrades. Delaying the analysis of any new water supply utility infrastructure until post-certification of the EIR/EIS conflicts with State CEQA Guidelines Section 15126.4(a)(1)(B) and limits full disclosure of the project's overall impact and any additional mitigation measures which may result from such analysis. State CEQA Guidelines Section 15126.4(a)(1)(B) requires that where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures shall not be deferred until some future time. Further, given PUE MM#1 fails to identify specific procedures for any additional environmental analysis associated from the construction and operation of any potential new water supply utility infrastructure. Thus, PUE MM#1 leaves open the possibility that future utility upgrades required for different project portions could be treated as individual projects within each water supplier jurisdiction, rather than collectively analyzed as an impact from the project (i.e., piece mailing). The City faces potential risks if future water analyses reveal insufficiencies without predefined fallback measures. Therefore, the EIR/EIS should be revised to correct the aforementioned deficiencies.
	SECTION 3.8: HYDROLOGY AND WATER RESOURCES		
1529	**Improper Reliance on Regulations**		Generally in this section, permanent impacts are concluded to be "less than significant" largely because the analysis relies on future IAMFs, SWMTPs, and permits rather than finalized designs. Insufficient detail is provided regarding the SWMTPs and permits (content requirements and analysis of how requirements would avoid or lessen impacts). The analysis minimizes Fullerton-specific impacts and focuses narrowly on regulatory water compliance, rather than broader drainage and water quality impacts relevant to Fullerton. Courts require mitigation to be specific, enforceable, and not deferred (Sundstrom v. County of Mendocino). Therefore, this deficiency must be addressed in EIR/EIS.
1530	**Fullerton Station Option**		The Fullerton Station Option increases impervious surfaces, train frequency (braking, runoff pollutants), station operations/human activities but the impacts are concluded to be "similar" to Alternative A except for size of disturbance area and impervious surfaces. Therefore, this deficiency must be addressed in EIR/EIS. Also, the City requests a City-specific Hydrology & Flood Risk Analysis.

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1531	**Detention Basin**	3.8-55	This page states that "drainage within this area along the tracks would be pumped out of the below-grade section and discharged to a proposed detention basin before flows are conveyed to a local existing storm drain." The basin would be 11.53 acres. Please provide to Fullerton the technical documentation that shows this basin is adequately sized.
	SECTION 3.9: GEOLOGY, SOILS, SEISMICITY, AND PALEONTOLOGICAL RESOURCES		
1532		3.9-31	Fullerton contains soils with moderate to high corrosivity. The project will include many underground infrastructure improvements (e.g., water/gas pipes, sewer lines, foundations, etc.). The EIR/EIS addresses soil corrosion hazards as a result of construction, but there is no discussion of long-term impacts from corrosion. Unless addressed properly, the long-term effects of corrosive soils include accelerated failure and costly damage to underground infrastructure. Unless addressed correctly, corrosive soils can lead to leaks, service disruptions, structural cracks, and potential environmental contamination. Therefore, the EIR/EIS should be revised to address the long-term effects of corrosive soils in Fullerton. Also, not only could these disruption adversely affect Fullerton, but they also add maintenance burdens to the City. Please address the funding needed for the long term infrastructure maintenance burden on the City due to in corrosive soil conditions.
1533		3.9-75	This page states that construction of Alternative A in areas of high groundwater could require dewatering for bridge column construction or construction of below-grade underpasses and the trench section near Fullerton Municipal Airport. Given the proximity to the trench, dewatering can cause subsidence at the airport. Also see page 2-82 comment above.
	SECTION 3.10: HAZARDOUS MATERIALS AND WASTES		
1534	**Exclusion of Fullerton Plans and Policies from Section 3.10 Regulatory Section**	3.10-8	Table 3.10-1: Regional and Local Codes, Plans, and Policies excludes Fullerton General Plan's Master Element C: The Fullerton Community which addresses safety.
1535	**Missing Analysis of Airport Specific Hazardous Waste**	3.10-23	Section 3.10-5: Affected Environment discusses potential hazardous substances in roads, railroad corridors, and utility corridors, but does not discuss potential hazardous substances at airports despite extensive excavation for the Fullerton Braced Trench near the Fullerton Airport.
1536	**Potential Contamination Encountered During Construction within Fullerton**	3.10-45 3.10-47	"Only excavation associated within the Fullerton Trench under Shared Passenger Track Alternative A (and Shared Passenger Track Alternative B) near the Fullerton Municipal Airport is expected to encounter groundwater, which is outside the boundary of the Orange County North Basin. Within the Orange County North Basin, earthwork activities in proximity to map ID 155 (Autonetics/Raytheon at 311 S Highland; USEPA ID CAN000900354) depicted on Figure 19 of Appendix 3.10-A (potentially one of the responsible parties that contaminated groundwater in the Orange County North Basin) would likely encounter contaminated soil. In lieu of remediating contaminated sites, project design, and engineering controls could be implemented to avoid contaminated sites if the extent of the contamination or the logistics of remediation are prohibitive. Engineering controls as part of the project design such as redesigning aboveground spans to avoid contaminated locations could be implemented and will reduce the potential for exposure to contamination." "With inclusion of the Fullerton HSR Station Option, impacts would be greater than those of the Shared Passenger Track Alternatives in the station area. The construction area for the HSR platform, facilities, and parking would be

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1536			within a larger area than what would be modified under the Shared Passenger Track Alternatives and would include more extensive excavations. There are two additional PEC sites (map IDs 154 and 155 on Figure 19 of Appendix 3.10-A) within the Fullerton Station Option footprint, compared to the area that would be modified under the Shared Passenger Track Alternatives. One of the PEC sites is listed as Oscar Cleaners (map ID 154) and is categorized as a Category B site with no releases, and the other is listed as Fullerton Manufacturing/Raytheon (map ID 155) and is categorized as a Category A site with contaminant releases to both soil and groundwater. However, these two additional PEC sites are not on the Cortese List. Because the construction area for the Fullerton Station Option is larger and includes more extensive excavations than those required for implementation of the Shared Passenger Track Alternatives (where most excavations would be shallow and limited to roadway realignment, new tracks, and building foundations), there would be a greater potential for encountering hazardous wastes from PEC sites. However, the HSR station option will incorporate the same IAMFs used for Shared Passenger Track Alternative A (HMW-IAMF#1, HMW-IAMF#3, HMW-IAMF#4, HMW-IAMF#6, HMW-IAMF#9, and GEO-IAMF#3), which will minimize impacts. Implementation of HMW-MM#2 would also be required with inclusion of the Fullerton Station Option because construction within the Orange County North Basin Superfund project area (Figure 3.10-3) would potentially cause a significant hazard associated with encountering hazardous wastes from the site." Therefore, the EIR/EIS should be revised to address the aforementioned deficiencies.
1537		3.10-50	Impact HMW-6: Handling of Hazardous Materials, Substances, or Waste within 0.25 Mile of a School concludes that incorporation of HMW-MM#1, which requires limited use of extremely hazardous materials near schools during construction, would reduce impacts to less than significant. Schools within 0.25 miles of Fullerton station including Pacific Drive Elementary, Richman Elementary, Maple Elementary, Fullerton First United Methodist Preschool, and Wilshire Avenue Preschool. This mitigation fails to sufficiently address all impacts assumes under HMW-6. If Impact HMW-4 concluded impacts would be significant and unavoidable under CEQA related to Project construction associated with the Orange County North Basin Superfund site, then Project construction associated with the Orange County North Basin Superfund site that is also within .25-mile of a school should similarly result in significant and unavoidable impacts. Although controlling placement of hazardous waste such that it avoids proximity to schools reduces the risk of upset and accident conditions handling HMW during construction, the potential still exists for construction to encounter contamination during soil excavation and demolition within the Orange County North Basin Superfund site, or on other site's later identified as contaminated during subsequent ESA investigations. To minimize impacts from known and unknown hazardous waste encounters during construction, the City requests that incident reporting protocols be established with City and school officials prior to any ground disturbing activities.
1538		3.10-51	Impact HMW-6: Handling of Hazardous Materials, Substances, or Waste within 0.25 Mile of a School concludes that with inclusion of the Fullerton Station Option, impacts would be the same as those of the Shared Passenger Track Alternatives in the station area. However, Impact HMW-5 concludes impacts would be greater with inclusion of the Fullerton Station Option given the Project's footprint would increase. It is not explained why a similar increase in impacts would not occur here. Therefore, the EIR/EIS should be revised to address this deficiency.

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1539		3.10-54	Impact HMW-8: Operations and Maintenance Transport, Use, Storage, and Disposal of Hazardous Materials and Hazardous Wastes, compares the quantities of hazardous materials to be transported, stored, used, or disposed of during operations to the quantities assumed during construction. This analysis incorrectly compares the project impacts to those during the construction phase instead of the baseline condition. This comparison minimizes the increase of hazardous materials transport, storage, use, or disposal as a result of the project, which also includes improvements which would increase freight quantities throughout the corridor. Therefore, the EIR/EIS should be revised to address this deficiency.
1540			HMW-IAMF#1 is insufficient in minimizing HMW-10 impacts from O&M near Cortese List sites such as the Orange County North Basin Superfund site. In accordance with ASTM Standards, a Phase I, II, or III ESA and its findings expire 180 days after preparation. A Phase I ESA presents findings from a snapshot in time for purposes of disclosing liabilities prior to property acquisition and is not considered a tool used to manage long term O&M of a facility located in proximity to Cortese Listed sites. There is potential for changes in the Orange County North Basin Superfund site and for new contaminated sites to occur during O&M of the HSR Project, which would not be captured from an ESA prepared prior to construction. Further, discussion under this impact analysis should be revised to include discussion of measures the HSR Project would take so not to exacerbate conditions near Cortese List sites such as the Orange County North Basin Superfund site (e.g., stormwater filtration, etc.).
1541		3.10-59	Section 3.10.7.2 HMW-MM#2: Coordination of High-Speed Rail Design and Construction with Remediation of Exide Site and Orange County North Basin Superfund Site states "The list of public interested parties receiving the aforementioned updates [regarding HSR project design and site remediation] will include any individual or entity who submitted a written comment letter to the Authority during the Draft EIR/EIS public comment period or to the Authority Board before its public meeting to certify the EIR/EIS, if the written comment explicitly requests to receive "updates specified in HMW-MM#2 regarding HSR design at either the Exide Site or the Orange County North Basin site" and if the written comment includes a valid address." Therefore, the City requests to receive updates specified in HMW-MM#2 regarding HSR design at either the Exide Site or the Orange County North Basin site at City of Fullerton Planning Division 303 West Commonwealth Avenue, Fullerton, CA 92832.
1542		3.10-61	Table 3.10-7: Mitigation Measures Required for Early Action Projects only mentions that the Fullerton Metrolink (i.e., Interlocker) Station must only comply with HMW-MM#1, despite the Interlocker's location within the Orange County North Basin Superfund Site. Given this Interlocker's location, compliance with HMW-MM#2 should be required to mitigate impacts to Impact HMW-4: Construction within or Near Sites of Potential Environmental Concern or Cortese List Sites. Further, the EIR/EIS should be revised to include a determination as to whether construction HMW-4 impacts for the Interlocker should also be considered significant and unavoidable.
	SECTION 3.11: SAFETY AND SECURITY		
1543	**Interference with Aviation Safety**	3.11-96	See page 2-82 Comment regarding Fullerton Airport safety. This page states that Alternative A would involve construction of new passenger rail within the RPZ of Fullerton Airport and therefore would be inconsistent with the Airport Environs Land Use Plan for Fullerton Municipal Airport. It further states "Conflicts from Shared Passenger Track Alternative A with operations of the above airports and heliports would be assessed during the FAA review and approval process." The EIR states that coordination with FAA and adherence to SS-IAMF#2 and SS-IAMF#5 will help ensure compliance with aviation safety regulations and compliance with any FAA conditions

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1543			resulting from FAA review of the project section, further minimizing risks during construction and operation. However, the risks and hazards to Fullerton Airport during construction have not been analyzed and the details regarding FAA review have not been provided, but rather deferred to the FAA review and approval process. By deferring to FAA review, confirmation that the risks and hazards to Fullerton Airport, or at the least the extent and details concerning FAA's review, the EIR/EIS fails to disclose any impacts to the airport from construction. Courts require mitigation to be specific, enforceable, and not deferred (Sundstrom v. County of Mendocino). In this case, the IAMF. Therefore, this deficiency must be addressed in EIR/EIS.
1544	**Potential for Criminal and Terrorist Activity**	Page 3.11-112	The proposed Fullerton Station pedestrian underpass/tunnel connecting the platforms and southerly right-of-way pose long-term safety and security concerns. This page states that "during final project design, the Authority will perform threat and vulnerability assessments to establish provisions for the deterrence and detection of, and protocols for the response to, criminal or terrorist acts involving HSR facilities and system operations. The Authority will apply the recommendations from the threat and vulnerability assessment during operations. Therefore, the threat and vulnerability assessment would minimize the potential for criminal and terrorist activity (SS-IAMF#2). System security plans and an SEPP will be developed prior to operations (SS-IAMF#2)." However, this would not occur until final project design phase. The Threat and Vulnerability Assessment is a key safety measure that is being deferred. Deferring to final design also deprives the City of any meaningful participation in the development of mitigation measures to ensure pedestrian safety in the proposed tunnel. Therefore, these deficiencies must be addressed in the EIR/EIS. The City also recommends a proactive Crime Prevention Through Environmental Design (CPTED) approach be considered as part of the Final EIR/EIS. In addition, we request more detailed information be provided addressing accessibility, user comfort/perception, drainage, and wayfinding. The City also requests that all long-term maintenance roles and responsibilities be defined early on. Any additional burden to the City shall require predetermined relief (funding, resources, etc.).
	SECTION 3.13: STATION PLANNING, LAND USE, AND DEVELOPMENT		
1545			The Fullerton Station serves as a cultural and historic anchor for the community, and preserving its identity is a high priority for the City. Any proposed improvements must reflect and complement the character of the Santa Fe Depot and surrounding Downtown. The City requests additional information on how the station design, public spaces, and user experience will reinforce a cohesive sense of place. The approach should address community cohesion, encourage place-based stewardship, promote sustainable development and tourism. The Fullerton Station's proposed design under both Alternatives and the Fullerton Station Option shifts the center of activity and future transit-oriented investment toward the south side of the tracks. This conflicts with the City's adopted Fullerton Station Specific Plan, which prioritizes placemaking, multimodal connectivity, economic development, and civic activation on the north side of the station adjacent to Downtown. This misalignment may compromise pedestrian access, dilute economic development opportunities, and undermine years of planning and community engagement.
1546	**Station Area Planning Alignment**		The City requests a comprehensive evaluation of how the Alternatives aligns with adopted station area plans, General Plan goals, and Downtown Specific Plan policies. The current configuration appears to reposition primary

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1546			station access and infrastructure activity to the south, which conflicts with established land use planning that centers civic identity, multimodal access, and transit-oriented development on the north side adjacent to Downtown. This shift represents a significant change in the City's physical and planning footprint. To ensure cohesive connectivity, circulation, and public realm continuity across both sides of the platform, the City requests that Metrolink and CHSR either lead or fund a coordinated station area planning effort. This will help ensure cohesive integration of the proposed improvements while supporting continued community access, mobility, and development objectives and does not undermine prior local investment. The City requests that SCRRA formally confirm its role as lead agency and that the CEQA document provide a clear analysis of project consistency with local plans, including the Fullerton Station and SOCO Specific Plans. The City has not been engaged in early consultation or scoping and requests formal participation moving forward.
1547			Integration with the Built SOCO District. The SOCO Specific Plan has established a walkable, residential transit-oriented district south of the tracks, supported by housing development and pedestrian scale infrastructure. While this district was designed to complement the Fullerton Station, it was not originally envisioned as the station's primary point of access. The proposed infrastructure changes, such as pedestrian tunnels, platform realignment, and potential new access points, may alter circulation patterns and place additional demands on the area's public realm. The City is interested in working collaboratively to identify design strategies and supporting infrastructure that ensure safe, seamless, and context-sensitive connectivity between SOCO and Downtown, while preserving the station's civic presence and functionality on both sides of the tracks.
1548		3.13-59	This page notes that 7.43 acres would need to be acquired and converted to transportation uses with Alternative A and an additional 4.19 acres with the Fullerton Station Option; see **Attachment B: Summary of Fullerton Acquisitions**. Alternative A and the Fullerton Station Option could displace up to 23 and 9 businesses, respectively. It is unclear what agency will be acquiring the right-of-way identified in **Attachment B**, responsible for regulatory compliance concerning the acquisitions, and/or owning/maintaining the properties.
1549	**Land Use Impacts of Parking and Traffic Access Demands at Station Sites**	3.13-65	On-street parking is proposed to be removed on the southside of Walnut Avenue between Harbor Boulevard and Lemon Street. Parking in the area is heavily utilized. This page states parking would be added just south of Walnut Avenue between Highland and Richman Avenues. The new parking structure would accommodate up to 1,114 HSR parking spaces. Although the EIR/EIS concludes this would be sufficient to accommodate projected HSR parking demand under the Fullerton Option, no parking ratios or analysis are provided. Further, this section is silent on curbside operations and event peaks. Even with the parking structure, curb pickup/drop off and event surges could spill onto Walnut/Highland/Richman or downtown streets. The EIR/EIS should be revised to address these deficiencies. Preparation of a Parking Operations Plan would ensure dynamic pricing, shared parking agreements, and real time guidance to avoid neighborhood spillover; include overflow protocols. The City requests that parking replacement strategies be incorporated into the plan for the City's review and consideration.
1550		3.13-20	The Project's consistency analysis found in Appendix 3.1A evaluates only four goals. The analysis was silent on many other goals/policies (e.g., relevant to station design, pedestrian movement and safety, etc.)that are found in the following relevant Specific Plans:

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1550		• Fullerton Transportation Center Specific Plan • Fullerton Transit Village Specific Plan • Harbor Walk Specific Plan • 600 W. Commonwealth Specific Plan The EIR/EIS must be revised to address project consistency with the relevant goals and policies from these planning documents.
1551	3.13-23	This page states that the project section is incompatible with the Airport Environs Land Use Plan for Fullerton Municipal Airport because it would place new development within the runway protection zone. However, as noted above in page 2-82 Comment, the EIR/EIS does not provide a separate analysis for construction impacts to Fullerton Airport due to the proposed adjacent trenching/tunnelling. Therefore, the EIR/EIS must be revised to include these analyses.
SECTION 3.15: PARKS, RECREATION, AND OPEN SPACE		
1552	3.15-75	Impact PR-7: Permanent Visual Changes to Recreational Resources Character and Use does not include analysis of the project's impacts to Truslow Park. The EIR/EIS must be revised to analyze these impacts.
SECTION 3.19: CUMULATIVE IMPACTS		
1553 **Cumulative Projects**	3.19-13	Table 3.19-2 Cumulative Land Development Project List (also described in Volume 2, Appendix 3.19-A, Cumulative Plans and Nontransportation Projects List and Appendix 3.19-B, Cumulative Transportation Projects List) is missing the Streetlights Specific Plan – Mixed Use Project (now called "Atlas Fullerton"). Therefore, the EIR/EIS should be revised to consider this cumulative project. Additionally, we note the following typos/omissions: 29 Casa Bella – Highland and Valencia 32 City of Fullerton – streetlights replacement project
CHAPTER 5: COMMUNITY ANALYSIS		
1554	5-15	This section improperly relies on corridor-wide averaging in that community impacts are evaluated across large RSAs (45–65 sq. miles). This masks localized, severe impacts at the Fullerton Station area. The EIR/EIS does not provide analysis at a scale that reveals localized Fullerton burdens, given it relies on averages. Therefore, the City requests a Fullerton-specific Technical Addendum of the Fullerton Station area impacts.
1555		While the EIR/EIS addresses transportation, air quality, noise, hazardous materials, among other impacts, Fullerton bears disproportionate construction and operational impacts with limited operational benefits. Some follow: • Even with barriers and building treatments, some residual severe noise impacts remain; the EIR/EIR identifies these as potential disproportionately high and adverse effects (DHAEs) when affecting minority/low income block groups. • Construction at the Superfund site creates disproportionate risk for minority communities near Fullerton. The Fullerton Station Option exposes communities in south central Fullerton to residual hazardous materials risks, resulting in a disproportionately high and adverse effect to minority populations under NEPA.

CITY OF FULLERTON COMMENTS			
	CHAPTER/SECTION	PAGE	COMMENT
1555			Also, Alternative A with the Fullerton Station Option transfers a disproportionate share of unavoidable cultural and quality of life impacts to Fullerton, with mitigation that is partially deferred. Fullerton absorbs a disproportionate share of significant and unavoidable impacts.
1556			Many MM summarized in this section and found throughout the EIR/EIR are framed as: "Would be coordinated" and "Would be considered during final design." However, these do not provide performance standards or enforceable timing. The EIR/EIS' MM need to be revised to address these deficiencies. (Case law risk: Communities for a Better Environment v. City of Richmond)
1557	**Proposed Center Platform.**		Substantial right-of-way impacts are identified in the PEPD to accommodate the proposed fourth track extension and center platform; see **Attachment B**. It is unclear what agency will be acquiring the right-of-way and/or owning/maintaining the platform post construction. The City requests that the center platform maintain the aesthetics of the historic Santa Fe Depot and existing platforms. The City also request all long-term maintenance roles and responsibilities be defined early on. Any additional burden to the City shall require predetermined relief (funding, resources, etc.)

Attachment A: Fullerton Comments on IAMFs

	IAMF #	IAMF[1]	Comment
1558	AQ-IAMF#1	Fugitive Dust Emissions During construction, the Authority-designated contractor shall employ the following measures to minimize and control fugitive dust emissions. The Authority-designated contractor shall prepare a fugitive dust control plan for each distinct construction segment. At a minimum, the plan will describe how each measure will be employed and identify an individual responsible for ensuring implementation. At a minimum, the plan will address the following components unless alternative measures are approved by the applicable air quality management district. Before finalizing the plan, the Authority-designated contractor shall provide a draft of the plan to any potentially affected public school districts on their request, for their review and comment. • Cover all vehicle loads transported on public roads to limit visible dust emissions, and maintain at least 6 inches of freeboard space from the top of the container or truck bed. • Clean all trucks and equipment before exiting the construction site using an appropriate washing station that does not allow runoff to leave the site or mud to be carried on tires off the site. • Water exposed surfaces and unpaved roads at a minimum three times daily with adequate volume to result in wetting of the top 1 inch of soil but avoiding overland flow. Rain events may result in adequate wetting of top 1 inch of soil, thereby alleviating the need to manually apply water. • Limit vehicle travel speed on unpaved roads to 15 miles per hour. • Suspend any dust-generating activities when instantaneous wind speed exceeds 25 miles per hour. • Stabilize all disturbed areas, including storage piles that are not being used on a daily basis for construction purposes, by using water, a chemical stabilizer/suppressant, hydro mulch, or by covering with a tarp or other suitable cover or vegetative ground cover, to control fugitive dust emissions effectively. In areas adjacent to organic farms, the Authority-designated contractor will use nonchemical means of dust suppression. • Stabilize all on-site unpaved roads and off-site unpaved access roads, using water or a chemical stabilizer/suppressant, to effectively control fugitive dust emissions. In	In addition, the fugitive dust control plan should specifically address airport impacts and impacts to nearby sensitive receptors. We request that the plan be submitted to the City of Fullerton, Fullerton Airport, and the Fullerton School District for review and comment.

[1] In general, suggest requiring that affected agency be informed before and after implementation of each IAMF

	IAMF #	IAMF[1]	Comment
1558		areas adjacent to organic farms, the Authority-designated contractor will use nonchemical means of dust suppression. • Carry out watering or presoaking for all land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities. • For buildings up to 6 stories in height, wet all exterior surfaces of buildings during demolition. • Limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at a minimum of once daily, using a vacuum type sweeper. • After the addition of materials to or the removal of materials from surface or outdoor storage piles, apply sufficient water or a chemical stabilizer/suppressant. • Before finalizing the plan, the Authority-designated contractor shall provide a draft of the plan to any potentially affected public school districts on their request, for their review and comment.	
1559	AVQ-IAMF#1	Aesthetic Options Prior to construction, the Authority-designated contractor shall document, through issuance of a technical memorandum, how the Authority's aesthetic guidelines have been employed to minimize visual effects. The Authority seeks to balance providing a consistent, project-wide aesthetic with the local context for the numerous HSR nonstation structures across the state. Examples of aesthetic options will be provided to local jurisdictions that can be applied to nonstandard structures in the HSR system. Refer to Aesthetic Options for Non-Station Structures, 2017 (Authority 2017).	We request that this be submitted to the City of Fullerton for review and comment.
	BIO-IAMF#11	Maintain Construction Sites and BMP Training Prior to ground-disturbing activity, the Authority-designated contractor will prepare a construction site BMP field manual. The manual will contain standard construction site housekeeping practices required to be implemented by construction personnel. The manual will identify BMPs for the following topics: temporary soil stabilization, temporary sediment control, wind erosion control, nonstormwater management, waste management and materials control, rodenticide use, and other general construction site cleanliness measures, including trash control and removal. All construction personnel will receive training on BMP field manual implementation prior to working within the project footprint. All personnel will acknowledge, in writing, their understanding of the BMP field manual implementation requirements. The BMP field manual will be updated by January 31 of each year. The Authority will provide, on an annual basis, training updates to all construction personnel.	We request that this be submitted to the City of Fullerton for review and comment

	IAMF #	IAMF[1]	Comment
1559	BIO-IAMF#12	Design the Project to Be Bird Safe Prior to final construction design, the Authority-designated contractor will ensure that the catenary system, masts, and other structures such as fencing, electric lines, communication towers, and facilities are designed to be bird and raptor-safe in accordance with the applicable recommendations presented in Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC 2006) and Reducing Avian Collisions with Power Lines: State of the Art in 2012 (APLIC 2012). Applicable Avian Powerline Interaction Committee recommendations include, but are not limited to: • Ensuring sufficient spacing of phase conductors to prevent bird electrocution • Configuring lines to reduce vertical spread of lines or decreasing the span length if such options are feasible • Marking lines and fences (e.g., Bird Flight Diverter for fencing and lines) to increase the visibility of lines and reduce the potential for collision. Where fencing is necessary, using bird-compatible design standards to increase visibility of fences to prevent collision and entanglement • Installing perch guards to discourage avian presence on and near project facilities • Minimizing the use of guywires. Where the use of guywires is unavoidable, demarcating guywires using the best available methods to minimize avian strikes (e.g., line markers) • Reusing or co-locating new transmission facilities and other ancillary facilities with existing facilities and disturbed areas to minimize habitat impacts and avoid collision risks • Using structures with monopole or dual-pole design versus lattice tower design to minimize perching and nesting opportunities. Communication towers will conform to Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning (USFWS 2021). • Using facility lighting that does not attract birds or their prey to project sites. Best practices include using nonsteady burning lights (red, dual red and white strobe, strobe-like flashing lights) to meet Federal Aviation Administration (FAA) requirements, using motion or heat sensors and switches to reduce the time when lights are illuminated, using appropriate shielding to reduce horizontal or skyward illumination, and avoiding the use of high-intensity lights (e.g., sodium vapor, quartz, and halogen). Lighting will not be installed under viaduct and bridge structures in riparian habitat areas. Additional bird operational actions will be required for dry lakes and playas, Audubon	We request that the related lighting plan be submitted to Fullerton Airport for review and comment and to the design of the tunnel portal showing how it discourages roosting to Fullerton Airport for review and comment

	IAMF #	IAMF[1]	Comment
1559		Important Bird Areas and documented avian movement corridors. These measures include: • Avoid, to the extent feasible, siting transmission lines across canyons or on ridgelines to prevent bird and raptor collisions. • Install bird flight diverters on facilities spanning or within 1,000 feet of stream and wash channels, canals, ponds, and other natural or artificial body of water. • Install fencing or other type of flight diverter on viaduct structures to encourage birds and raptors to fly over the HSR and avoid flying directly in the path of oncoming trains. • Ensure poles do not have openings that could entrap birds. Measures may include sealing or capping openings in poles or providing for escape routes (e.g., openings accommodating escape for various species). • Design aerial structures (e.g., viaducts and bridges) and tunnel portals to discourage birds and bats from roosting in expansion joints or other crevices.	
1560	CUL-IAMF#6	Preconstruction Conditions Assessment, Plan for Protection of Historic Built Resources, and Repair of Inadvertent Damage Prior to construction (any ground-disturbing activities that are within 1,000 feet of a historic built resource), the Authority-designated contractor may be required to assess the condition of historic build resources adjacent to construction and prepare a Plan for the Protection of Historic Built Resources and Repair of Inadvertent Damage. The memorandum of agreement and BETP will stipulate for which properties the plan is to be prepared. Memorandum of agreement signatories and Consulting Parties may comment on the adequacy of the assessments. Protection measures will be developed in consultation with the landowner or land-owning agencies as well as the SHPO and the memorandum of agreement signatories and Consulting Parties, as required by the Section 106 Programmatic Agreement. As the design progresses, additional properties may be identified by the Authority as requiring this plan. The plan will record existing conditions in order to (1) establish a baseline against which to compare the property's post-project condition, (2) identify structural deficiencies that make the property vulnerable to project-construction-related damage, such as vibration, and (3) identify stabilization or other measures required to avoid or minimize inadvertent adverse effects. The plan will be further described in the BETP and be prepared by an interdisciplinary team, including (but not limited to), as appropriate, an architectural historian, architect, photographer, structural engineer, and acoustical engineer. Ambient conditions will be used to identify buildings	We request that the plan be submitted to the City of Fullerton for review and comment to ensure historic built resources within 1,000-feet are addressed in Plan.

IAMF #	IAMF[1]	Comment
1560	that are sensitive receptors to construction-related vibration and require vibration monitoring during construction activities. Additional protective measures may be required if the property is vacant during construction. The plan content will be outlined in the BETP and is to be completed and approved by the Authority, with protective measures implemented before construction begins within 1,000 feet of the subject property. The plan will describe the protocols for documenting inadvertent damage (should it occur), as well as notification, coordination, and reporting to the SHPO, memorandum of agreement signatories, and the owner of the historic built resource. The plan will direct that inadvertent damage to historic built resources will be repaired in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (U.S. Department of the Interior 1995). The plan will be developed in coordination with the Authority and FRA, and it will be submitted to the SHPO for review and approval. Protective plans will be required for buildings that will be moved as part of the project mitigation, including stabilization before, during, and after relocation; protection during temporary storage; and relocation to a new site, followed by rehabilitation.	
CUL-IAMF#7	Built Environment Monitoring Plan Prior to construction (any ground-disturbing activities within 1,000 feet of a historic property or resource), the Authority-designated contractor will prepare a Built Environment Monitoring Plan. Draft and final Built Environment Monitoring Plans will be prepared describing the properties that will require monitoring, the type of activities or resources that will require full-time monitoring or spot checks, the required number of monitors for each construction activity, and the parameters that will influence the level of effort for monitoring. Maximum vibration level thresholds may be established in the Plan for Protection of Historic Resources and Repair of Inadvertent Damage, the monitoring of which will be included in this monitoring plan. The BETP will outline the process for corrective action should the protection measures prove ineffective. Consultation procedures will also be defined in the BETP. The Authority-designated contractor will develop both the draft and final plans in coordination with the Authority and FRA, and the plans will be submitted to the SHPO for review and approval. The plan will be implemented prior to any ground-disturbing activities within 1,000 feet of properties identified as requiring monitoring, as specified in the BETP.	Submit to the City of Fullerton for Review and Comment

	IAMF #	IAMF[1]	Comment
1561	EMF/EMI-IAMF#2	Controlling Electromagnetic Fields/Electromagnetic Interference Prior to construction, the Authority-designated contractor will prepare an electromagnetic field/electromagnetic interference technical memorandum for review and approval by the Authority. The HSR project will adhere to international guidelines and comply with applicable federal and state laws and regulations. The HSR project design will follow TM 300.10, Implementation Stage Electromagnetic Compatibility Program Plan, the HSR Design Criteria Manual Chapter 26, which provides detailed electromagnetic compatibility design criteria for the HSR systems and equipment, and the HSR Design Criteria Manual Chapter 22, which addresses grounding requirements for third-party metallic structures, including fences and pipelines, which are parallel and adjacent to the HSR right-of-way. These documents describe the design practices to avoid electromagnetic interference and to provide for HSR operational safety. Some measures of the Authority's Implementation Stage Electromagnetic Compatibility Program Plan include: • During the planning stage through system design, the Authority-designated contractor will perform electromagnetic compatibility/electromagnetic interference safety analyses, which will include identification of existing nearby radio systems, design of systems to prevent electromagnetic interference with identified neighboring uses, and incorporation of these design requirements into bid specifications used to procure radio systems. • Pipelines and other linear metallic objects that are not sufficiently grounded through the direct contact with earth will be separately grounded in coordination with the affected owner or utility to avoid possible shock hazards. For cases where metallic fences are purposely electrified to inhibit livestock or wildlife from traversing the barrier, specific insulation design measures will be implemented. • HSR standard corrosion protection measures will be implemented to eliminate risk of substantial corrosion of nearby metal objects.	We request that the plan be submitted to the Fullerton Airport for review and comment.
1562	CA-IAMF#1	Authority Community Ombudsperson and Contractor's Community Liaison Prior to final design, the Authority shall create an ombudsperson position to address the needs of adversely affected communities. The Authority will also make available resources developed for community analysis IAMFs to any other affected communities that are identified in Chapter 5 of the EIR/EIS along the alignment, if a specific community so requests. The Authority's final design plans and contract documents shall require the contractor to establish a full-time community liaison to serve as a multilingual single point of contact for the eligible communities. The scope of the Authority's community ombudsperson and contractor's community liaison responsibilities and duties include	We request that these notices also be submitted to the City of Fullerton.

IAMF #	IAMF[1]	Comment
1562	those articulated in the other community analysis–related IAMFs. These responsibilities include implementing programs (e.g., the Workforce Development Program, community air quality monitoring), holding community roundtables to obtain ideas for business spotlighting, developing appropriate aesthetic treatments, proposing potential intersection or safety improvements, and obtaining community-specific feedback on the following plans not typically reviewed by the general public: • Construction Management Plan (CMP) (SOCIO-IAMF#1) • Relocation Mitigation Plan (SOCIO-IAMF#3) • Construction Safety Transportation Management Plan (SS-IAMF#1) • Safety and Security Management Plan (SS-IAMF#2) • Operations Noise and Vibration Technical Memorandum (NV-IAMF#1) The community ombudsperson and contractor's community liaison shall have stop-work authority in the event of safety concerns and may also apply stop-work authority for project-related concerns regarding fugitive dust, construction noise, and traffic (e.g., noncompliance with designated truck hauling routes and the California Transportation Plan). Beginning with final design and throughout the construction phase of the project, the contractor's community liaison shall submit reports (quarterly, at minimum) to the ombudsperson providing evidence of compliance with all community analysis IAMFs, maintenance of pedestrian access per TR-IAMF#4, communication of relocation mitigation plan, and relocation ombudsperson availability (SOCIO-IAMF#3). During construction, the contractor's community liaison shall provide multilingual notices (e.g., online information, e-blasts, text messaging, voice messaging, or mailers) to inform communities (specifically, communities identified in the first paragraph of this IAMF) of the Authority's hotline for reporting community concerns or complaints regarding construction noise and traffic effects and updates. These notices shall be provided 2 weeks in advance of each planned instance of vehicle, pedestrian, bicycle, transit access, and utility service disruption. Notices shall continue, at a minimum, until the communities receive post-construction guidance with details of how to access and ride the HSR system. The community liaison's report to the ombudsperson shall include all concerns and complaints received from communities and measures taken by the Authority or its contractors to address those concerns and complaints. The Authority's construction contractor shall implement all corrective actions communicated by the community ombudsperson, or their community liaison, within a 24-hour period unless written authorization from the community ombudsperson provides the contractor with an alternate timeline. The Authority shall ensure the point of contact has access to the Authority's contract interpretation and translation services for substantial Limited English Proficiency	

IAMF #	IAMF[1]	Comment
1562	languages in the affected area. Substantial shall be as defined in state Limited English Proficiency law (the Dymally Alatorre Bilingual Services Act). The Authority may also consider contracting with a community organization for substantial Limited English Proficiency communities to assist with outreach.	
CA-IAMF#3	Community-Inclusive Development of Aesthetic Treatments and Community Cohesion Enhancements In addition to the requirements in AVQ-IAMF#1 and AVQ-IAMF#2, the contractor's community liaison shall work with the Authority community ombudsperson to hold community roundtables to seek input on locally desired aesthetic treatment preferences from the adversely affected communities (as defined in CA-IAMF#1), possibly developed by local artists. Treatment options may include streetscape, vegetation screening, consideration of a community mural, and beautification tree plantings or plant plantings (such as improvements to an existing community garden or establishment of a new community garden location). As appropriate, reuse of property purchased by the Authority that is within the communities (as defined in CA-IAMF#1) shall be considered for plant and tree plantings. Upon Authority review for compatibility with the Draft Design Opportunities for Local Jurisdictions and Aesthetic Requirements and approval, the identified locally desired aesthetic treatments shall be included in the final design plans. The Authority's contractor shall implement the aesthetic treatments in the construction of HSR infrastructure.	We request that the roundtable notices be submitted to the City of Fullerton
CA-IAMF#4	Business Relocation/Displacement Assistance Pursuant to SOCIO-IAMF#3, the Authority will develop a relocation mitigation plan. The plan will include a subsection dedicated to addressing adverse effects to businesses in the communities (as defined in CA-IAMF#1). This subsection shall include a description of measures taken or proposed to offset the adverse effects of business displacements and relocations in communities, including a description of measures to relocate displaced businesses in proximity to their same community. The Authority shall hold community roundtable meetings to seek and consider input from affected communities prior to finalizing the Authority's Relocation Mitigation Plan.	We request that the roundtable notices be submitted to the City of Fullerton

	IAMF #	IAMF[1]	Comment
1563	GEO-IAMF#1	Geologic Hazards Prior to construction, the Authority-designated contractor will prepare a CMP addressing how the Authority-designated contractor will address geologic constraints and minimize or avoid impacts related to geologic hazards during construction. This geologic hazard risk minimization plan will be submitted to the Authority for review and approval. The plan will address the following geological and geotechnical constraints/resources, with reference to the specific underlying standards set forth in the guidance and other manuals detailed in GEO-IAMF#10: a. Groundwater Withdrawal: Controlling the amount of groundwater withdrawal from the project by re-injecting groundwater at specific locations if necessary, or using alternate foundation designs to offset the potential for settlement. This control is important for locations with retained cuts in areas where high groundwater exists, and where existing buildings are located near the depressed track section. b. Unstable Soils: Employing various methods to mitigate for the risk of ground failure from unstable soils. If soft or loose soils are encountered at shallow depths, they can be excavated and replaced with competent soils. To limit the excavation depth, replacement materials can also be strengthened using geosynthetics. Where unsuitable soils are deeper, ground improvement methods, such as stone columns, cement deep-soil-mixing, or jet-grouting, can be used. Alternatively, if sufficient construction time is available, preloading—in combination with prefabricated vertical drains (wicks) and staged construction—can be used to gradually improve the strength of the soil without causing bearing-capacity failures. c. Subsidence: The Authority-designated contractor addresses subsidence in its design and construction processes. For the initial design, survey monuments were installed to establish a datum and set an initial track profile. In the construction phase, the Authority-designated contractors for track bed preparation will conduct topographic surveys for preparation of final design. Because subsidence could have occurred since the original benchmarks (survey monuments) were established, the Authority-designated contractor's topographic surveys will be used to help determine whether subsidence has occurred. The updated topographic surveys will also be used to establish the top of rail elevations for final design where the HSR system is outside established floodplain areas and above water surface elevations. Where the HSR system is in floodplain areas susceptible to flooding, consideration is being given to overbuild the height of the railbed in anticipation of future subsidence. d. Water and Wind Erosion: The Authority-designated contractor will implement erosion control methods as appropriate from the various erosion control methods documented in the Construction SWPPP (refer to HYD-IAMF#3), California Department of	We request that the CMP be submitted to the City of Fullerton and Fullerton Airport for review and comment, particularly related to a., b., c., and d. related to lowered track section.

IAMF #	IAMF[1]	Comment
1563	Transportation (Caltrans) Construction Manuals, and in coordination with other erosion, sediment, stormwater management, and fugitive dust control efforts. Water and wind erosion control methods may include, but are not limited to, use of revegetation, stabilizers, mulches, and biodegradable geotextiles. e. Soils with Shrink-Swell Potential: In locations where shrink-swell potential is marginally unacceptable, soil additives will be mixed with existing soil to reduce the shrink-swell potential. Construction specifications will be based on the decision whether to remove or treat the soil. This decision is based on the soils, specific shrink-swell characteristics, the additional costs for treatment versus excavation and replacement, as well as the long-term performance characteristics of the treated soil. f. Soils with Corrosive Potential: In locations where soils have a potential to be corrosive to steel and concrete, the soils will be removed and buried structures will be designed for corrosive conditions, and corrosion-protected materials will be used in infrastructure. g. Faults: The Authority-designated contractor will identify and characterize faults as either Nonhazardous Faults, Potentially Hazardous Fault Zones, or Hazardous Fault Zones through a progressive process described in Technical Memorandum 2.10.6, titled Fault Hazard and Mitigation Guidelines (Parsons Brinkerhoff 2014). Technical Memorandum 2.10.6 provides guidelines for the identification, characterization, and resolution of displacement associated with faulting. A structural engineer will evaluate the potential for ground deformation, including fault-related folding, based on findings from the geotechnical investigation. The structural engineer will recommend appropriate design methods and engineering techniques to reduce or withstand potential geologic risks identified in the geotechnical investigation. These methods and techniques will be incorporated into the structural design to minimize the risk of permanent damage to structures or increased exposure of people to potential loss of life or injury from active fault-related folding. Potential strategies may include increased articulation at piers, simple spans with large and elongated bearing seats, enhanced derailment containment, seismic isolation and dissipation devices, monopile foundations at areas where the deformation zone is not well defined, and ductile and thickened reinforced mat concrete foundations.	
GEO-IAMF#7	Evaluate and Design for Large Seismic Ground Shaking Prior to construction, the Authority-designated contractor shall document through preparation of a technical memorandum how all HSR components were evaluated and designed for large seismic ground shaking. Prior to final design, the Authority-designated contractor will conduct additional seismic studies to establish up-to-date estimation of levels of ground motion. The most current Caltrans seismic design criteria at the time of design will be used in the design of	We request that the Technical Memo be submitted to the City of Fullerton for review and comment, including evaluation of derailment risk from HSR, Metrolink, Amtrak, and BNSF within the City boundary, during and after construction.

	IAMF #	IAMF[1]	Comment
1563		any structures supported in or on the ground. These design procedures and features reduce to the greatest practical extent for potential movements, shear forces, and displacements that result from inertial response of the structure. In critical locations, pendulum base isolators may be used to reduce the levels of inertial forces. New composite materials may also be used to enhance seismic performance.	
1564	HMW-IAMF#1	Property Acquisition Phase I and Phase II Environmental Site Assessments, Additional Preconstruction Investigations, and Associated Actions to Control Site Contamination During the right-of-way acquisition phase, Phase I environmental site assessments (ESA) will be conducted in accordance with standard ASTM methodologies, ASTM E 1527-21, or more recent applicable requirements, to characterize each parcel, including parcels at potential environmental concern sites. Parcels that require a Phase II ESA (e.g., soil, groundwater, soil vapor subsurface investigations) will be identified using information and data obtained in the Phase I ESAs. Phase II and subsequent investigation may require coordination with federal, state, and local agency officials, as well as other stakeholders. Depending on the arrangement negotiated during property acquisition, potential environmental concern sites with known or suspected contamination may be remediated prior to construction on the site. For sites that are not remediated prior to acquisition, data obtained during the Phase I ESA will be used to evaluate the need for and the extent of additional investigation. The Phase II ESA and any additional characterization data collected will be used to inform aspects of detailed project design and actions required during construction and operation of the project to protect human health and the environment from contaminants present on the parcels (e.g., targeted removal of contamination, in-situ treatment, or soil capping). Project design details for construction at sites subject to cleanup or land use controls will be reviewed and approved by appropriate environmental oversight agencies. Design and other corrective actions required to protect human health and the environment will be coordinated with appropriate federal, state, and local agency officials and stakeholders (as necessary) and conducted in full compliance with recorded land use restrictions, applicable state and federal laws and regulations, and local ordinances. Controls necessary to protect workers, the public, and the environment from contamination discovered during the ESAs and preconstruction site investigations will be identified and are required to be implemented during construction in accordance with HMW-IAMF#4.	If soil or groundwater is contaminated near the Fullerton Airport at the trench location, then managing soil excavation and groundwater removal should be addressed in the Hazardous Materials and Wastes report. There is some mention of this on EIR/EIS page 3.10-45, but identification of impacts at the Airport/trench location is not provided.

	IAMF #	IAMF[1]	Comment
1564	HMW-IAMF#4	Known, Suspected, and Unanticipated Environmental Contamination The Authority, or its Authority-designated design contractor, prior to completion of 30 percent design, will develop a soil management plan that incorporates information and data regarding known and suspected contamination obtained per HMW-IAMF#1. The plan will include requirements for protection of human health and the environment to be implemented by the Authority-designated construction contractor during construction on sites at which contamination is or may be present. The soil management plan will be reviewed and approved by appropriate agencies with oversight responsibilities for sites subject to cleanup or land use controls and will be provided to the Authority-designated construction contractor, who shall be contractually obligated to meet the plan requirements. Prior to construction the Authority-designated construction contractor, in accordance with the soil management plan, will prepare a CMP addressing provisions for the disturbance and handling of known, suspected, and unanticipated contamination; and protection of existing remedial systems and contamination controls (e.g., vapor barriers) where construction may affect or damage such systems and controls. The plan requires that an environmental professional provide oversight of activities that may result in encountering known or suspected contamination. The CMP shall require the Authority-designated contractor to develop and implement site-specific health and safety protocols that address site hazards in compliance with California Division of Occupational Safety and Health regulations for handling contaminated media, including training of construction workers in hazard recognition and monitoring for hazardous contaminants to which workers may be exposed in areas where contamination is known or suspected based on data obtained under HMW-IAMF#1. Use of field screening equipment will be specified as appropriate based on data obtained under HMW-IAMF#1 (e.g., for volatile organic vapors). The CMP shall include specifications for controlling releases of contaminants or contaminated media during construction, including dust control, control of soil erosion and contaminated water runoff, vapor control, and testing and proper storage and disposal of excavated material. The CMP will include an effective monitoring and cleanup program for spills and leaks of any hazardous materials or contaminated media. Requirements for sampling and analysis of media suspected to be contaminated shall be included in the CMP. For work at sites subject to contaminant cleanup, the CMP will be submitted, as required, to regulatory agencies with oversight authority for the cleanup and to stakeholders. The CMPs include requirements for notification by the Authority-designated contractor to the Authority, which will notify appropriate stakeholders and agencies of newly discovered contamination. The Authority will work closely with the stakeholders and regulatory agencies to resolve any such encounters and address necessary cleanup or disposal. Recordkeeping requirements will	Same comment as above.

	IAMF #	IAMF[1]	Comment
1564		be specified in the CMP. For operations in areas with known and suspected contamination, the Authority will prepare and implement emergency response procedures that address the unlikely potential of a major hazardous materials release close to or in the vicinity of the project as required by federal, state, and local regulations. The CMP will be submitted to the Authority for review and approval. Copies of all documentation generated in accordance with the CMP, including monitoring and analytical results, will be provided to the Authority within 30 days of receipt of analytical results or encountering of apparent contaminated media (soil, groundwater, or vapor).	
1565	HYD-IAMF#1	Stormwater Management Prior to construction, the Authority-designated contractor will prepare a stormwater management and treatment plan in compliance with municipal separate storm sewer systems and construction general permits, issued by the State Water Resources Control Board for review and approval by the Authority. During the detailed design phase, each receiving stormwater system's capacity to accommodate project runoff will be evaluated. As necessary, on-site stormwater management measures, such as detention or selected upgrades to the receiving system, will be designed to provide adequate capacity and comply with the design standards in the latest version of Authority Technical Memorandum 2.6.5, Hydraulics and Hydrology Guidelines (Authority 2011a), HSR Design Criteria Manual, Caltrans Stormwater Quality Handbook: Project Planning and Design Guide (Caltrans 2017), and the requirements stated in the applicable state and local National Pollutant Discharge Elimination System permits and guidelines. On-site stormwater management facilities will be designed and built to capture runoff and provide treatment of pollutant-generating surfaces prior to discharge off site, including from station parking areas, access roads, new road over- and underpasses, reconstructed interchanges, and new or relocated roads and highways. Low-impact development techniques will be used to detain runoff on site and reduce off-site runoff, such as through use of built wetland systems, biofiltration and bioretention systems, wet ponds, organic mulch layers, soil beds, and vegetated systems (biofilters), such as vegetated swales and grass filter strips, which will be used where appropriate. The stormwater management and treatment plan will also address hydromodification such that preproject hydrology is maintained. Hydromodification design measures will include incorporating on-site retention of stormwater runoff by using flow dispersion, infiltration, and evaporation (supplemented by detention where required). Additional flow control measures will be implemented where local regulations or drainage requirements dictate.	We request that the plan be submitted to the City of Fullerton for review and comment.

	IAMF #	IAMF[1]	Comment
1565	HYD-IAMF#3	Prepare and Implement a Construction Stormwater Pollution Prevention Plan Prior to construction (any ground-disturbing activities), the Authority-designated contractor shall comply with the State Water Resources Control Board Construction General Permit requiring preparation and implementation of a SWPPP. The SWPPP will be prepared by a qualified SWPPP developer and reviewed and approved by the Authority's environmental manager. The Construction SWPPP will propose BMPs to minimize potential short-term increases in sediment transport caused by construction, including erosion control requirements, stormwater management, and channel dewatering for affected stream crossings. These BMPs will include measures to incorporate permeable surfaces into facility design plans where feasible, and describe how treated stormwater will be retained or detained on site. Other BMPs will include strategies to manage the amount and quality of overall stormwater runoff. The construction SWPPP will include measures to address, but is not limited to, the following: • Hydromodification management to verify maintenance of preproject hydrology by emphasizing on-site retention of stormwater runoff using measures such as flow dispersion, infiltration, and evaporation (supplemented by detention where required); additional flow control measures will be implemented where local regulations or drainage requirements dictate. • Implementing practices to minimize the contact of construction materials, equipment, and maintenance supplies with stormwater. • Limiting fueling and other activities using hazardous materials to areas distant from surface water, providing drip pans under equipment, and requiring daily checks of vehicle condition. • Implementing practices to reduce erosion of exposed soil, including soil stabilization, regular watering for dust control, perimeter siltation fences, and sediment catchment basins. • Implementing practices to maintain current water quality, including siltation fencing, wattle barriers, stabilized construction entrances, grass buffer strips, ponding areas, organic mulch layers, inlet protection, storage tanks, and sediment traps to arrest and settle sediment. • Where feasible, avoiding areas that may have substantial erosion risk, including areas with erosive soils and steep slopes. • Using diversion ditches to intercept surface runoff from off site. • Where feasible, limiting construction to dry periods when flows in waterbodies are low or absent.	We request that the SWPPP be submitted to the City of Fullerton for review and comment.

	IAMF #	IAMF[1]	Comment
1565		• Implementing practices to capture and provide proper off-site disposal of concrete wash water, including isolation of runoff from fresh concrete during curing to prevent it from reaching the local drainage system and possible treatments (e.g., dry ice). • Developing and implementing a spill prevention and emergency response plan to handle potential fuel or hazardous material spills. • Implementing a SWPPP by the construction Authority-designated contractor as directed by the Authority-designated contractor's QSP or designee. The qualified SWPPP developer will report all findings to the Authority-designated contractor's environmental manager. As part of that responsibility, the effectiveness of construction BMPs must be monitored before, during, and after storm events. Records of these inspections and monitoring results are submitted to the local RWQCB as part of the annual report required by the Statewide Construction General Permit. The reports are available to the public online. The State Water Resources Control Board and regional water quality control board will have the opportunity to review these documents.	
1566	LU-IAMF#1	HSR Station Area Development: General Principles and Guidelines Prior to O&M, the Authority-designated contractor will prepare a memorandum for each station describing how Authority's station area development principles and guidelines are applied to achieve the anticipated benefits of station area development. Refer to HSR Station Area Development General Principles and Guidelines, February 3, 2011.	We request that the memorandum be submitted to the City of Fullerton for review and comment, as well as distribution to nearby community and businesses.
	LU-IAMF#2	Station Area Planning and Local Agency Coordination Prior to O&M, the Authority-designated contractor will prepare a memorandum for each station describing the local agency coordination and station area planning conducted to prepare the station area for HSR operations. Refer to HSR Station Area Development: General Principles and Guidelines, February 3, 2011.	We request that the memorandum be submitted to the City of Fullerton for review and comment, as well as distribution to nearby community and businesses.
1567	NV-IAMF#1	Noise and Vibration Prior to construction, the Authority-designated contractor shall prepare and submit to the Authority a noise and vibration technical memorandum documenting how the Federal Transit Administration and FRA guidelines for minimizing construction noise and vibration impacts will be employed when work is being conducted within 1,000 feet of sensitive receptors. Typical construction practices contained in the Federal Transit Administration and FRA guidelines for minimizing construction noise and vibration impacts include the following: • Build noise barriers, such as temporary walls or piles of excavated material, between	We request that the memorandum be submitted to the City of Fullerton for review and comment.

	IAMF #	IAMF[1]	Comment
1567		noisy activities and noise sensitive resources. • Route truck traffic away from residential streets, when possible. • Build walled enclosures around especially noisy activities or around clusters of noisy equipment. • Combine noisy operations so that they occur in the same period. • To reduce vibration, phase demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period. Unlike noise, the total vibration level produced could be significantly less when each vibration source operates separately. • Avoid impact pile driving where possible in vibration sensitive areas.	
1568	PUE-IAMF#3	Public Notifications Prior to construction in areas where utility service interruptions are unavoidable, the Authority will obtain written consent from utility owners prior to construction consistent with the HSR Design Criteria Manual Chapter 28, Utilities, Section 28.2.2.3.4, Level of Service and Service Interruptions. The Authority-designated contractor will notify the public through a combination of communication media (e.g., by phone, email, mail, newspaper notices, or other means) within that jurisdiction and the affected service providers of the planned outage. The notification will specify the estimated duration of the planned outage and will be published no less than 7 days prior to the outage. Construction will be coordinated to avoid interruptions of utility service to hospitals and other critical users. The Authority-designated contractor will submit the public communication plan to the Authority 60 days in advance of the work for verification that appropriate messaging and notification are to be provided.	We request that the notifications and public communication plan be submitted to the City of Fullerton for review and comment.
	PUE-IAMF#4	Utilities and Energy Prior to construction, the Authority-designated contractor will prepare a technical memorandum documenting how construction activities will be coordinated with utility service providers to minimize or avoid planned and accidental temporary interruptions. It will include upgrades of existing power lines to connect the HSR system to existing utility substations. The memorandum will identify all affected utility service providers, proposed coordination activities before and during construction, as well as the location of all known underground utilities. The technical memorandum will be provided to the Authority for review and approval prior to the start of coordination with any utility service providers. Confirmation of existing utilities will be conducted with all utility service providers consistent with the HSR Design Criteria Manual Section 28.2.2.3.2, Utility Verification Request to Owner. In addition, the Authority-designated contractor and each utility service provider will agree on the best ways to coordinate during	We request that the memorandums be submitted to the City of Fullerton for review and comment.

	IAMF #	IAMF[1]	Comment
1568		construction for all planned and accidental interruptions of utility service. Following these initial Authority-designated contractor coordination activities with the utility service providers, the Authority-designated contractor will prepare a second technical memorandum to document the location of confirmed utility infrastructure that will be affected by construction activities consistent with the HSR Design Criteria Manual Chapter 28, Utilities, and California Government Code Section 4215 as well as the negotiated protocols the Authority-designated contractor will use to coordinate during construction with each affected utility service provider. This technical memorandum will be reviewed and approved by the Authority.	
1569	SS-IAMF#1	Construction Safety Transportation Management Plan Prior to construction (any ground-disturbing activity), the Authority-designated contractor will prepare for submittal to the Authority a construction safety transportation management plan. The plan will describe the Authority-designated contractor's coordination efforts with local jurisdictions for maintaining emergency vehicle access. The plan also will address duration of road and traffic lane closures, length of detour routes, and ongoing coordination during construction with local jurisdictions as well as emergency service providers. The plan will also specify the Authority-designated contractor's procedures for implementing temporary road closures including: access to residences and businesses during construction, lane closures, signage and flag persons, temporary detour provisions, alternative bus and delivery routes, emergency vehicle access, and alternative access locations. The Authority requires the Authority-designated contractor to maintain emergency vehicle access and access for nearby residences and business throughout the duration of construction. The Authority-designated contractor will prepare and submit monthly reports to the Authority documenting Construction Transportation Plan (CTP) implementation activities for compliance monitoring.	We request that the plan be submitted to the City of Fullerton for review and comment.
	SS-IAMF#2	Safety and Security Management Plan The Authority will require the Authority-designated contractor to prepare a safety and security management plan that complies with the below-listed requirements to protect public safety and security. Sixty days after receiving from the Authority a construction notice to proceed, the Authority-designated contractor shall provide the Authority with a technical memorandum documenting how the following requirements, plan, programs, and guidelines were considered in design, construction, and eventual operation to protect the safety and security of construction workers and users of the HSR. The Authority-designated contractor shall be responsible for implementing all construction-related safety and security plans and the Authority shall be responsible for implementing all safety and security plans related to HSR operation. • Workplace worker safety is generally governed by the Occupational Health and Safety Act of 1970, which established the Occupational Health and Safety Administration. The	We request that the plan be submitted to the City of Fullerton for review and comment.

IAMF #	IAMF[1]	Comment
1569	Occupational Health and Safety Administration establishes standards and oversees compliance with workplace safety and reporting of injuries and illnesses of employed workers. In California, Occupational Health and Safety Administration enforcement of workplace requirements is performed by California Occupational Safety and Health Administration. Under California Occupational Health and Safety Administration regulations, as of July 1, 1991, every employer must establish, implement, and maintain an injury and illness prevention program. • The Authority has adopted the California High-Speed Rail Program Safety and Security Management Plan (Authority 2018) to guide the safety and security activities, processes, and responsibilities during design, construction and implementation phases of the project to protect the safety and security of construction workers and the public. A Systems Safety Program and a Security and Emergency Preparedness Plan will be implemented prior to the start of revenue service to guide the safety and security of the operation of the HSR system. • Prior to construction, the Authority-designated contractor will provide the Authority with a Safety and Security Management Plan documenting how they will apply the Authority's safety and security requirements within their project scope. • Implement site-specific health and safety plans and site-specific security plans to establish minimum safety and security guidelines for Authority-designated contractors of, and visitors to, construction projects. The Authority-designated contractor will be required to develop and implement site-specific measures that address regulatory requirements to protect human health and property at construction sites. • Preparation of a Valley Fever action plan that includes: (1) information on causes, preventive measures, symptoms, and treatments for Valley Fever to individuals who could potentially be exposed through construction activities (i.e., construction workers, monitors, managers, and support personnel); (2) continued outreach and coordination with California Department of Public Health; (3) coordination with county departments of public health to ensure that the above referenced information concerning Valley Fever is readily available to nearby residents, schools, and businesses and to obtain area information about Valley Fever outbreaks and hotspots; and (4) provide a qualified person dedicated to overseeing implementation of the Valley Fever prevention measures to encourage a culture of safety of the Authority-designated contractors and Authority-designated subcontractors. The Valley Fever Health and Safety designee will coordinate with the county Public Health Officer and oversee and manage the implementation of Valley Fever control measures. The Valley Fever Health and Safety designee is responsible for ensuring the implementation of measures in coordination with the county Public Health Officer. Medical information will be maintained following applicable and appropriate confidentiality protections. The Valley Fever Health and	

IAMF #	IAMF[1]	Comment
1569	Safety designee in coordination with the county Public Health Officer will determine what measures will be added to the requirements for the Safety and Security Management Plan regarding preventive measures to avoid Valley Fever exposure. Measures will include, but are not limited to the following: (1) train workers and supervisors on how to recognize symptoms of illness and ways to minimize exposure, such as washing hands at the end of shifts; (2) provide washing facilities nearby for washing at the end of shifts; (3) provide vehicles with enclosed, air conditioned cabs and make sure workers keep the windows closed; (4) equip heavy equipment cabs with high-efficiency particulate air filters; and (5) make National Institute for Occupational Safety and Health approved respiratory protection with particulate filters as recommended by the California Department of Public Health available to workers who request them. • System safety program plans incorporate FRA requirements and are implemented on FRA approval. The FRA's Systems Safety Program Plan requirements will be determined in the FRA's new System Safety Regulation (49 CFR Part 270). • Rail systems must comply with FRA requirements for tracks, equipment, railroad operating rules and practices, passenger safety, emergency response, and passenger equipment safety standards found in 49 CFR Parts 200-299. • The HSR Urban Design Guidelines (Authority 2011b) require implementing the principles of crime prevention through environmental design. The Authority-designated contractor will consider four basic principles of crime prevention through environmental design during station design and site planning; territoriality (design physical elements that express ownership of the station or site); natural surveillance (arrange physical features to maximize visibility); improved sightlines (provide clear views of surrounding areas); and access control (provide physical guidance for people coming and going from a space). The HSR design includes emergency access to the rail right-of-way, and elevated HSR structure design includes emergency egress points. • Implement fire/life safety and security programs that promote fire and life safety and security in system design, construction, and implementation. The fire and life safety program is coordinated with local emergency response organizations to provide them with an understanding of the rail system, facilities, and operations, and to obtain their input for modifications to emergency response operations and facilities, such as evacuation routes. The Authority-designated contractor will establish fire/life safety and security committees throughout the project section. • Implement system security plans that address design features intended to maintain security at the stations within the track right-of-way, at stations, and onboard trains. A dedicated police force will ensure that the security needs of the HSR system are met. • The design standards and guidelines require emergency walkways on both sides of	

IAMF #	IAMF[1]	Comment
1569	the tracks for both elevated and at-grade sections and the provision of appropriate space as defined by fire and safety codes along at-grade sections of the alignment to allow for emergency response access. • Implement standard operating procedures and emergency operating procedures, such as the FRA-mandated Roadway Worker Protection Program to address the day-to-day operation and emergency situations that will maintain the safety of employees, passengers, and the public.	
SS-IAMF#3	Hazard Analyses The Authority's hazard management program includes the identification of hazards, assessment of associated risk, and application of control measures (mitigation), to reduce the risk to an acceptable level. Prior to project construction, the Authority or its contractor will prepare a hazard assessment includes a preliminary hazard analysis and threat and vulnerability assessment. • The Authority's programmatic preliminary hazard analyses are developed in conformance with the FRA's Collison Hazard Analysis Guide: Commuter and Intercity Passenger Service (FRA 2007) and the U.S. Department of Defense's System Safety Program Plan (MIL-STD-882) to identify and determine the facility hazards and vulnerabilities so that they can be addressed by—and either eliminated or minimized—the design. • Threat and vulnerability assessments establish provisions for the deterrence and detection of, as well as the response to, criminal and terrorist acts for rail facilities and system operations. Provisions include right-of-way fencing, security lighting, security procedures and training, and closed-circuit televisions. Intrusion-detection technology could also alert to the presence of inert objects, such as toppled tall structures or derailed freight trains, and stop HSR operations to avoid collisions. • During design and construction, the Authority-designated contractor will conduct site-specific preliminary hazard analysis and threat and vulnerability assessments to apply the programmatic work to their specificproject designs. The Authority's safety and security committees will be responsible for implementing the recommendations contained in the hazard analysis during HSR operation.	We request that the assessment be submitted to the City of Fullerton for review and comment
SS-IAMF#4	Oil and Gas Wells Prior to ground-disturbing activities, the Authority-designated contractor shall identify and inspect all active and abandoned oil and gas wells within 200 feet of the HSR tracks. Any active wells will be abandoned and relocated by the Authority-designated contractor in accordance with the California Department of Conservation, Division of Oil, and Gas and Geothermal Resources standards in coordination with the well owners. In the event that relocated wells do	We request that the notification be submitted to the City of Fullerton if any such wells within 200 feet for the HSR track in City

	IAMF #	IAMF[1]	Comment
1569		not attain the current production rates of the now-abandoned active wells, the Authority will be responsible for compensating the well owner for lost production. All abandoned wells within 200 feet of the HS tracks will be inspected and re-abandoned, as necessary, in accordance with California Department of Conservation, Division of Oil, and Gas and Geothermal Resources standards and in coordination with the well owner. The Authority-designated contractor will provide the Authority with documentation that the identification and inspection of the wells has occurred prior to construction.	
1570	SS-IAMF#5	Aviation Safety To address FAA requirements related to its mandate of ensuring civil aviation safety and to prevent the potential for disruption of airfield and airspace operations at Fullerton Municipal Airport as a result of construction or operation of the project section, the Authority or the Authority-designated contractor(s) on behalf of the Authority will: • Submit designs, information, or both to FAA as required by 14 CFR Part 77 to ensure design of permanent HSR features within and adjacent to the boundary of Fullerton Municipal Airport do not intrude into imaginary surfaces as defined in 14 CFR Part 77.9(b). • Submit construction plans, information, or both to FAA as required by 14 CFR Part 77, which may include the location of planned HSR construction and construction staging areas within and adjacent to the boundary of the Fullerton Municipal Airport, the types and height of proposed equipment, and planned time/duration of construction, to ensure construction within and adjacent to the boundary of Fullerton Municipal Airport does not intrude into imaginary surfaces as defined in 14 CFR Part77.9(b). • Implement measures required by FAA to ensure continued safety of air navigation during HSR construction and operation, pursuant to 14 CFR Part 77.5(c). • Ensure that the planned HSR facilities do not violate any grant assurances that are imposed at Fullerton Municipal Airport as a condition for obtaining an Airport Improvement Grants from FAA. • If necessary, work with the City of Fullerton to amend the current Airport Layout Plan for any temporary or permanent construction-related facilities required for the HSR project to be submitted to the FAA for approval.	In addition to FAA, we request that copies be submitted to the City of Fullerton and Fullerton Airport on all documentation and correspondence
1571	SOCIO-IAMF#1	Construction Management Plan Prior to construction, the Authority-designated contractor will prepare a CMP providing measures that minimize construction impacts on communities, in particular low-income households and minority populations that are more sensitive to construction-borne disruptions. The plan will be submitted to the Authority for review and approval. The plan will include actions pertaining to communications, visual protection, air quality, safety controls, noise controls, and	We request that the plan be submitted to the City of Fullerton for review and comment.

	IAMF #	IAMF[1]	Comment
1571		traffic controls to minimize impacts on surrounding communities, particularly low-income households and minority populations. The plan will verify that property access is maintained for local businesses, residences, and emergency services. This plan will include maintaining customer and vendor access to local businesses throughout construction by using signs to instruct customers about access to businesses during construction. In addition, the plan will include efforts to consult with local transit providers to minimize effects on local and regional bus routes in affected communities.	
1572		TR-IAMF#1: Protection of Public Roadways During Construction Prior to construction, the Authority-designated contractor shall provide a photographic survey documenting the condition of the public roadways along truck routes providing access to the proposed project site. The photographic survey will be submitted for approval to the agency responsible for road maintenance and the Authority. The Authority-designated contractor will be responsible for the repair of any structural damage to public roadways caused by HSR construction or construction access, returning any damaged sections to the equivalent of their original pre-HSR construction structural condition or better. The Authority-designated contractor will survey the condition of the public roadways along truck routes providing access to the proposed project site after construction is complete. The Authority-designated contractor will complete a before- and after-survey report and submit it to the Authority for review, indicating the location and extent of any damage.	We request that the Pavement Condition Index (PCI) be provided and both before and after surveys be submitted to the City of Fullerton for review and approval.
	TR-IAMF#2	Construction Transportation Plan The Authority-designated contractor shall prepare a detailed CTP for the purpose of minimizing the impact of construction and construction traffic on adjoining and nearby roadways in close consultation with the local jurisdiction or property owners having authority over the site. The Authority must review and approve the CTP before the Authority-designated contractor commences any construction activities. This plan will address, in detail, the activities to be carried out in each construction phase, with the requirement of maintaining traffic flow during peak travel periods. Such activities include, but are not limited to, the routing and scheduling of materials deliveries, materials staging and storage areas, construction employee arrival and departure schedules, employee parking locations, and temporary road closures, if any. The CTP will provide traffic controls pursuant to the California Manual on Uniform Traffic Control Devices sections on temporary traffic controls (Caltrans 2017) and will include a traffic control plan that includes, at a minimum, the following elements: • Temporary signage to alert drivers and pedestrians to the construction zone. • Flag persons or other methods of traffic control. • Traffic speed limitations in the construction zone.	We request that the CTP be submitted to the City of Fullerton for review and comment. We request that the CTP include ID truck routes. The CTP should address contractor need to prevent early morning queuing on City streets at secured parking areas and need to prevent queuing on City street of delivery and haul vehicles outside construction entrances.

IAMF #	IAMF[1]	Comment
1572	• Temporary road closures and provisions for alternative access during the closure. • Detour provisions for temporary road closures—alternating one-way traffic will be considered as an alternative to temporary closures where practicable and where it will result in better traffic flow than will a detour. • Identified routes for construction traffic. • Provisions for safe pedestrian and bicycle passage or convenient detour. • Provisions to minimize access disruption to residents, businesses, customers, delivery vehicles, and buses to the extent practicable. Where road closures are required during construction, limit to the hours that are least disruptive to access for the adjacent land uses. • Provisions for 24-hour access by emergency vehicles. • Safe vehicular and pedestrian access to local businesses and residences during construction. The plan will provide for scheduled transit access where construction will otherwise impede such access. Where an existing bus stop is within the work zone, the Authority-designated contractor will provide a temporary bus stop at a safe and convenient location away from where construction is occurring in close coordination with the transit operator. Adequate measures will be taken to separate students and parents walking to and from the temporary bus stop from the construction zone. • Advance notification to the local school district of construction activities and rigorously maintained traffic control at all school bus loading zones, to provide for the safety of schoolchildren. Review existing or planned Safe Routes to Schools with school districts and emergency responders to incorporate roadway modifications that maintain existing traffic patterns and fulfill response route and access needs during project construction and HSR operations. • Identification and assessment of the potential safety risks of project construction to children, especially in areas where the project is near homes, schools, daycare centers, and parks. • Promotion of child safety within and near the resource study area. For example, crossing guards could be provided in areas where construction activities are near schools, daycare centers, and parks. CTPs will consider and account for the potential for overlapping construction projects.	

	IAMF #	IAMF[1]	Comment
1573	TR-IAMF#3	Off-Street Parking for Construction-Related Vehicles The Authority-designated contractor will identify adequate off-street parking for all construction-related vehicles throughout the construction period to minimize impacts on public on-street parking areas. If adequate parking cannot be provided on the construction sites, the Authority-designated contractor shall designate a remote parking area and arrange for the use a shuttle bus to transfer construction workers to/from the job site. This measure will be addressed in the CTP.	Between the airport and the existing BNSF tracks is Artesia Avenue. Permanent right-of-way acquisition is needed from Artesia Avenue to accommodate the braced trench, narrowing Artesia Avenue. It appears that Artesia Avenue would be narrowed from two lanes in each direction to one lane in each direction, both during construction and permanently. We request that an evaluation and coordination be conducted with emergency responders, City of Fullerton, and Fullerton Airport.
1574	TR-IAMF#6	Restriction on Construction Hours The Authority-designated contractor will limit construction material deliveries between 7 a.m. and 9 a.m. and between 4 p.m. and 6 p.m. on weekdays to minimize impacts on traffic on roadways. The Authority-designated contractor will limit the number of construction employees arriving or departing the site between the hours of 7 a.m. and 8:30 a.m. and 4:30 p.m. and 6 p.m. Areas where these restrictions will be implemented will be determined as part of the CTP. Based on Authority review of the CTP, the restricted hours may be altered to accommodate local travel patterns.	What does "limit" mean- prohibit?
1575	TR-IAMF#8	Construction During Special Events The Authority-designated contractor will provide a mechanism to prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events that substantially (10 percent or more) increase traffic on roadways affected by project construction. Mechanisms include the presence of police officers directing traffic, special-event parking, use of within-the-curb parking, or shoulder lanes for through-traffic and traffic cones. This measure will be addressed in the CTP.	How will Agency inform Authority?

Attachment B: Summary of Fullerton Acquisitions[1]

Parcel #	Grantor	Sq Ft (Total)	Sq Ft (Required) (i.e., to be acquired)
066-391-39-1	LAKESIDE MASTER ASSN	57,030	11,923
066-391-39-2	LAKESIDE MASTER ASSN	57,030	38,054
066-391-07	FULLERTON ARTESIA	245,977	102,610
066-391-32	KIM YOUN SOO	31,746	996
030-052-20	CITY OF FULLERTON	12,475	3,074
030-051-30-1	CITY OF FULLERTON	3,797	527
030-051-30-2	CITY OF FULLERTON	3,797	768
030-060-12-1	PACIFIC WEST MANAGEMENT	478,500	6,314
030-060-12-2	PACIFIC WEST MANAGEMENT	478,500	9,316
030-060-08-1	STORAGE EQUITIES INC	162,117	1,923
030-060-08-2	STORAGE EQUITIES INC	162,117	2,883
030-051-31	CITY OF FULLERTON	3,740	513
030-070-16-1	JYI GILBERT INVESTMENTS	77,568	25,985
030-070-16-2	JYI GILBERT INVESTMENTS	77,568	906
030-160-29	LICATA BROTHERS LLC	55,412	8,795
030-160-27	NAKAMURA MASAKO TR	214,350	8,264
030-160-05	CAPITAL SATCO LTD	34,564	1,394
030-160-19	CAPITAL SATCO LTD	53,975	2,220
030-160-26	FULLERTON SELF-STORAGE	85,723	3,646
030-160-25	FULLERTON SELF STORAGE	74,472	3,304
030-170-12	YODER DONALD H	209,449	9,282
030-170-15	WESTCO CENTER ENTERPRISES	66,026	5,533
030-170-08	RAHM DOROTHY L TR	21,003	21,003
030-170-09	EGARI ROY TR	60,417	6,552
030-170-03	EGARI ROY TR	15,428	15,428
030-252-01	GRACE KOREAN CHURCH AT	35,140	8,618
030-170-13	WESTCO CENTER ENTERPRISES	25,726	1,741
030-290-03	UNION PACIFIC RR	3,487	3,487
030-290-21	CITY OF FULLERTON	97,574	2,260
030-275-01	VITELAANTONIO	7,074	340
030-275-02	SEFCIC TEREZIA	7,220	412
030-275-03	MC MORMICK ROBINA	7,221	417
030-275-04	GIOURGAS GEORGE TR	7,220	423
030-275-05	MANALOTO MARIA	7,221	429
030-275-06	FLORES DANIEL	7,648	258
031-150-30	NICOLAS FAMILY LLC	1,238,548	4,243
030-290-05	CITY OF FULLERTON	3,009	602
032-091-13	SUCCESSOR AGENCY FULLERTON	141,170	66,420
032-091-14	BOS TICK JAMES BTR	54,624	54,624
033-030-18	SUCCESSOR AGENCY FULLERTON	241,818	20,862

[1] Source: California High Speed Rail Authority. (2025). Volume 3.1: General, Track Alignment, and Right-of-Way Part 2 XXX, pages 84 to 102.Available at: https://hsr.ca.gov/wp-content/uploads/2025/11/LAA-PEPD-Vol3.1_Record_Set_2_a11y_508.pdf

033-030-23	SUCCESSOR AGENCY FULLERTON	206	206
033-030-24	SUCCESSOR AGENCY FULLERTON	1,476	1,476
033-030-25	SUCCESSOR AGENCY FULLERTON	77,306	77,306
033-030-14	THE CITY OF FULLERTON	39,486	371
033-143-31	NONE LISTED	2,290	2,290
033-143-30	ORANGE COUNTY	35,686	35,686
033-143-37	SERVICE ROOFING CO INC	60,664	2,400
033-143-29	ORANGE COUNTY	3,350	3,350

22.32 Response to Submission 013864 (Chris Schaefer, City of Fullerton, Feb 3, 2026)

22.32.1 1479

The comment suggests that the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) is insufficiently detailed and it is difficult to locate city-specific impacts on Fullerton. The Draft EIR/EIS analyzes the environmental impacts, both adverse and beneficial, of implementing the high-speed rail (HSR) between Los Angeles and Anaheim at an appropriate level of detail. The EIR/EIS is based on detailed project planning and design specific to the Los Angeles to Anaheim Project Section (project section). The impacts analysis therefore provides site-specific information about the potential environmental impacts of the project section of the HSR system. For a linear project crossing two counties, it is not possible to include a descriptive parcel-by-parcel or city-by-city impact discussion in the main text of the EIR/EIS. To do so would result in an environmental document that would be so large and unwieldy that it would not serve its informational value. For this reason, and consistent with the focus of both the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) that an EIR/EIS serve as an informational tool for the public and decision-makers, the impact analysis in Volume 1 of the EIR/EIS includes summarized technical information sufficient to allow a full assessment of the significant environmental impacts of the project. Specific sites and cities where impacts would occur are detailed in each section of Chapter 3, Affected Environment, Environmental Consequences, and Mitigation Measures. Additional details are provided in Volume 2 appendices, as well as in detailed technical reports that were identified and referenced within the EIR/EIS Volume 1 text and were available upon request during the public comment period for the Draft EIR/EIS.

The California High-Speed Rail Authority (Authority) acknowledges that the length of the Shared Passenger Track Alternative A discussions in each environmental section of the Draft EIR/EIS exceeds the length of the Shared Passenger Track Alternative B discussions. The Shared Passenger Track Alternatives would have the same alignment and design features. Their only substantial difference would be the location of the light maintenance facility (LMF). Shared Passenger Track Alternative A would build an LMF at 26th Street, whereas Shared Passenger Track Alternative B would build an LMF at 15th Street. Apart from project effects associated with construction and operation of the 26th Street LMF, the Shared Passenger Track Alternative A analyses were largely the same for Shared Passenger Track Alternative B. Accordingly, the Shared Passenger Track Alternative B analyses largely focus on how project effects associated with construction and operation of the 15th Street LMF would differ from those identified for Shared Passenger Track Alternative A and the 26th Street LMF. Similarly, the Norwalk/Santa Fe Springs and Fullerton HSR Station Options would result in several additional HSR elements at the stations beyond the modifications that would occur as part of the Shared Passenger Track Alternatives. As such, the HSR station option environmental analyses are not as extensive as the Shared Passenger Track Alternative A discussions, because they focus on incremental increases in project effects within the station areas from the additional HSR elements that would be built and operated as part of the HSR station options. Because the HSR station option components would be built in an area already being subjected to disturbance as part of the Shared Passenger Track Alternatives, the HSR station options' project effects would either be the same as or similar to those without the HSR station options.

With regard to mitigation measures, each Draft EIR/EIS section provides the mitigation measures to which the project section would be subject, and the Environmental Consequences subsection of each Draft EIR/EIS section identifies to which impact the mitigation measures would apply. For specific Fullerton locations identified by a technical report or appendix as being affected with respect to a given environmental topic, such locations would be subject to the mitigation measures identified in the corresponding environmental section of the Draft EIR/EIS.

Overall, the Draft EIR/EIS provides details that disclose city- and site-specific environmental impacts and corresponding mitigation measures. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.2 1480

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18, Standard Responses.

With respect to the comment's suggestion that the Draft EIR/EIS does not allow for ease of access to specific environmental analysis, refer to response to comment #1479 above.

The commenter states that the Fullerton Interlocker's impacts are not discernable/identifiable within the EIR/EIS, and requests a No Project+Fullerton Interlocker scenario to be included. As described in Section 2.6.5.3, Fullerton Metrolink/Amtrak Modifications (Fullerton Interlocker), of the Draft EIR/EIS, the Fullerton Interlocker components are necessary for HSR operations. Therefore, the Draft EIR/EIS treats the Fullerton Interlocker components as part of the HSR project definition and design, and analyzes the Fullerton Interlocker components as part of the project section.

Specifically, the Fullerton Interlocker portion of the HSR project design encompasses the project corridor vicinity from Highland Avenue to Raymond Avenue. Where the Draft EIR/EIS identifies project impacts at this location, these should be considered impacts that would occur from implementation of the Fullerton Interlocker as a discrete project. Conversely, if the Draft EIR/EIS does not identify project impacts at this location, then implementation of the Fullerton Interlocker as a discrete project would not result in project impacts. For instance, Sections 6.6.1.2 and 6.6.1.3 of the *Los Angeles to Anaheim Project Section Noise and Vibration Technical Report* include site-specific analysis of potential operational noise impacts on residential and institutional land uses at locations around Fullerton Junction, including the areas from Highland Avenue to Raymond Avenue. No severe operational noise impacts on residential or institutional land uses at these areas are identified. Therefore, operation of the Fullerton Interlocker should be considered to not result in any severe operational noise impacts.

The Authority did not separately describe project impacts for the Fullerton Interlocker components in the Draft EIR/EIS, because they would result in the same impacts in this area regardless of whether they were implemented separately or as a part of HSR. However, the Draft EIR/EIS does specifically identify the significant impacts requiring mitigation that are attributable to an early action project so that local agencies can fully understand what mitigation is required, should they choose to implement an early action project separately from HSR. For example, Table 3.4-22 in Section 3.4.7.6, Early Action Projects, of the Draft EIR/EIS provides that construction of the Fullerton Interlocker would be subject to N&V-MM#1, Construction Noise Mitigation Measures, to address construction noise impacts on sensitive receivers; and N&V-MM#2, Construction Vibration Mitigation Measures, to address construction vibration impacts on sensitive receivers. In other Chapter 3 sections where no mitigation measures are identified for the Fullerton Interlocker, this means the Fullerton Interlocker would not result in significant impacts requiring mitigation measures. As demonstrated above, the Draft EIR/EIS provides site-specific environmental analysis and disclosure of impacts and mitigation measures, including those associated with the Fullerton Interlocker, and therefore complies with the language from Public Resources Code Section 21189.80(b) quoted in the comment, even though that statute is not directly applicable to the project section.

The commenter states that they have not been provided an opportunity to collaborate on the Fullerton Interlocker Project. As detailed in Section 9.4.6, Agency Meetings and Consultation, of the Draft EIR/EIS, the Authority coordinated with many state and regional agencies as part of the environmental review process throughout the entire history of this project, including with the City of Fullerton. From 2021 to 2024, the Authority met with the city multiple times to discuss the alignment and station modifications in Fullerton, including discussions specifically on the Fullerton Interlocker design elements. The Authority also conducted Fullerton-specific outreach in 2025 to 2026, which included a workshop on the station modifications and a tour of the existing Metrolink/Amtrak Station. The Draft EIR/EIS was made available for public comment between December 5, 2025, and February 3, 2026. The City of Fullerton was provided the opportunity to review and comment on the Draft EIR/EIS's analyses and conclusions, and the Authority is responding to the City of Fullerton's comments on the Draft EIR/EIS as part of this Final EIR/EIS.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.3 1481

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

With respect to the comment's suggestion that the Fullerton Interlocker's impacts are not discernable or identifiable, refer to responses to comments #1479 and #1480 above.

The comment suggests that the Fullerton Interlocker components would introduce substantial impacts on residents, specifically to those residing at SOCO Walk south of Walnut Avenue and east of Harbor Boulevard. The Draft EIR/EIS technical reports include site-specific analyses of potential impacts, including those that could occur in Fullerton where the project components would be implemented. For site-specific analysis of noise and vibration impacts, refer to Section 6 of the *Los Angeles to Anaheim Project Section Noise and Vibration Technical Report*. For analysis of air quality impacts, refer to Section 7 of the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report*. For analysis of visual resource impacts, refer to Section 6 of the *Los Angeles to Anaheim Project Section Aesthetics and Visual Quality Technical Report*. For analysis of transportation impacts, refer to Section 6 of the *Los Angeles to Anaheim Project Section Transportation Technical Report*.

Where significant impacts are identified in the technical reports, these impacts are pulled forward and disclosed in the Draft EIR/EIS. For instance, Table 6-1 in the *Los Angeles to Anaheim Project Section Noise and Vibration Technical Report* provides the estimated noise impact distances for the project section's construction activities including, but not limited to, at-grade rail construction along the extent of the project alignment and the proposed modifications to the Fullerton Metrolink/Amtrak Station. These impact distances are pulled forward and disclosed in Section 3.4, Noise and Vibration, of the Draft EIR/EIS in Table 3.4-13 under Impact N&V-1, which sets forth N&V-MM#1 to address construction noise impacts on sensitive receivers.

With respect to air quality and global climate change, the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report* evaluates construction of six segments along the project section (refer to Table 6-4 of the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report*). None of the segments include the Fullerton Metrolink/ Amtrak Station; however, as detailed in Section 6.9.4.2 of the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report*, the segments were selected based on the magnitude of emissions, construction schedules (exposure durations), and proximity to sensitive and worker receptors. Therefore, the segments represent the locations where worst-case localized emissions could occur. Section 7.11.2 of the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report* provides that impacts from maximum localized construction criteria pollutant concentrations would not occur along any segment. Given that the segments represent a worst-case scenario, impacts would similarly not occur at the Fullerton Metrolink/Amtrak Station, where the Fullerton Interlocker components would be implemented. This information is pulled forward and disclosed under Impact AQ-7 in Section 3.3, Air Quality and Global Climate Change, of the Draft EIR/EIS. Section 3.3 similarly pulls forward the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report*'s other analyses of local air quality impacts.

With respect to aesthetics and visual quality, Section 6.3.1.1 of the *Los Angeles to Anaheim Project Section Aesthetics and Visual Quality Technical Report* lists the visual resources from which views toward the modified Fullerton Metrolink/Amtrak Station would be affected during construction. These visual resources from which views would be affected are pulled forward and disclosed in Section 3.16, Aesthetics and Visual Quality, of the Draft EIR/EIS under Impact AVQ-1, which sets forth AVQ-MM#1, Minimize Visual Disruption from Construction Activities, to establish remediation requirements for areas disturbed during construction.

With respect to transportation impacts, the Table 6-57 of the *Los Angeles to Anaheim Project Section Transportation Technical Report* provides the specific roadway segments, including those in Fullerton, that would experience level of service impacts under Horizon Year 2040 Plus Project conditions. These affected roadway segments are pulled forward and disclosed in Section 3.2,

Transportation, of the Draft EIR/EIS in Table 3.2-33 under Impact TR-12. However, it should be noted that as discussed in Section 3.2.7.9, Early Action Projects, of the Draft EIR/EIS, the permanent roadway modifications that would result in impacts on intersections and roadway segments are not attributable to a specific early action project. For the transportation mitigation measures that would be required as part of implementation of the early action projects, including the Fullerton Interlocker, refer to Section 16.5.2, Section 3.2: Transportation, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS and response to comment #1489 below.

With respect to habitat impacts, Section 3.7, Biological and Aquatic Resources, of the Draft EIR/EIS provides that federally designated critical habitat is not present in or adjacent to the Wildlife Resource Study Area (RSA). In addition, with respect to protected species that could be affected by effects on species' habitat from project construction, Section 7 of the *Los Angeles to Anaheim Project Section Biological and Aquatic Resources Technical Report* and Section 3.7 of the Draft EIR/EIS provide the impact avoidance and minimization features (IAMF) that will be incorporated by the Authority to address, reduce, or minimize impacts on protected species and other biological resources. For instance, Section 7.5.2.1 of the *Los Angeles to Anaheim Project Section Biological and Aquatic Resources Technical Report* provides that the Authority will incorporate BIO-IAMF#1, Designate Project Biologist, Designated Biologists, Species-Specific Biological Monitors, and General Biological Monitors; BIO-IAMF#3, Prepare Worker Environmental Awareness Program (WEAP) Training Materials and Conduct Construction Period WEAP Training; BIO-IAMF#6, Establish Monofilament Restrictions; BIO-IAMF#7, Prevent Entrapment in Construction Materials and Excavations; BIO-IAMF#8, Delineate Equipment Staging Areas and Traffic Routes; BIO-IAMF#9, Dispose of Construction Spoils and Waste; BIO-IAMF#10, Clean Construction Equipment; BIO-IAMF#11, Maintain Construction Sites and Best Management Practice (BMP) Training; and BIO-IAMF#12, Design the Project to Be Bird Safe, to address, reduce, or minimize permanent impacts on special-status birds, raptors, and migratory bird species. These same IAMFs are provided in the Draft EIR/EIS under the corresponding analysis of potential permanent impacts on special-status birds, raptors, and migratory bird species in Impact BIO-3. The IAMFs described in the Draft EIR/EIS are considered project components of the project section; therefore, implementation of the Fullerton Interlocker components would be subject to the foregoing IAMFs to address habitat disruptions that could affect special-status birds, raptors, and migratory bird species. Furthermore, Section 3.7.7.32, Early Action Projects, of the Draft EIR/EIS provides the specific biological and aquatic resources mitigation measures to which implementation of the Fullerton Interlocker component would be subject.

Based on the above, preparation of the Draft EIR/EIS included analysis of direct, indirect, and cumulative impacts specific to the area proposed for the Fullerton Interlocker components. Where impacts were identified, these impacts were pulled forward and disclosed in the Draft EIR/EIS, which identifies mitigation measures to reduce or minimize the impacts.

22.32.4 1482

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

The commenter states the City of Fullerton would experience an extended duration of construction-related impacts, should the Fullerton Interlocker be built first and HSR at a later date. The proposed modifications to the Fullerton Metrolink/Amtrak Station (i.e., the Fullerton Interlocker components) were incorporated into the HSR project in a manner to provide flexibility for it to be built as a standalone project. As discussed in Chapter 2, Alternatives, of the Draft EIR/EIS, specifically in Section 2.10.1, Project Delivery, the Fullerton Interlocker components are included in the last phase (Phase 8) after all mainline trackwork in the station area has been completed. Should the Fullerton Interlocker be built earlier than HSR, then the sequence of how the Draft EIR/EIS assumes the components would be installed would be altered, but there would not be a change in the impacts. All major modifications in this geographic area would already be complete, and HSR construction would solely be limited to installing overhead contact system (OCS) poles along the shared tracks and tying the project section into the fourth mainline track near Highland Avenue. The effects associated with OCS installation and track tie-ins are analyzed throughout the Draft EIR/EIS, and completing these

activities in Fullerton using a different sequence than described in Section 2.10.1 would not change the context or intensity of the construction activities or the level of significance of the impact. OCS installation is already identified as one of the last construction activities to occur after all other infrastructure is built, and temporary track closures in the station area are needed regardless of whether the Fullerton Interlocker is completed early.

22.32.5 1483

The commenter provides a broad assertion that some of the Authority's IAMFs are inadequate and provides some examples of perceived inadequacies, such as lack of input from local agencies, insufficient information on timing of implementation, and deferral of key decisions to future contractors. The commenter also refers to Attachment A: Comments on IAMFs for additional comments on specific IAMFs perceived as inadequate.

The IAMFs (refer to Appendix 2-A, Impact Avoidance and Minimization Features, of the Draft EIR/EIS) are programmatic and consist of features that the Authority will incorporate during project design and construction of the California HSR System to avoid or reduce environmental and community impacts, including impacts associated with the project section. The IAMFs include a description of when the IAMF will be incorporated, the party responsible for completing the requirements set forth by the IAMF, and the specific performance standards that must be achieved as part of the IAMF's incorporation. For example, TR-IAMF#1 (Protection of Public Roadways During Construction) serves to prevent permanent structural damage to public roadways as a result of construction of the project section. TR-IAMF#1 provides that prior to construction (when the IAMF will be incorporated), the Authority-designated contractor (responsible party) will provide a photographic survey documenting the condition of the public roadways along truck routes providing access to the project sites (performance standard). The contractor will be responsible for repairing any structural damage to roadways caused by HSR construction (performance standard). The contractor will also complete a before- and after-survey report, which will be reviewed by the Authority, to confirm the location and extent of any damage (performance standard).

The other IAMFs incorporated into the project section similarly identify when and who will implement the IAMF and the performance standards the IAMF must achieve. Therefore, the IAMFs include the necessary components to avoid or reduce environmental and community impacts associated with the project section. Because most of the IAMFs for the project section are programmatic, the IAMFs do not always identify specific local agencies, such as the City of Fullerton, with which the Authority will coordinate as part of incorporation of the IAMFs. Nonetheless, the Authority is committed to coordinating with local agencies, including the City of Fullerton, during design, construction, and operation of the project section to avoid and reduce impacts on local communities.

For detailed responses to the Attachment A: Comments on IAMFs, please refer to the responses to comments #1558 to #1575 below.

22.32.6 1484

The braced trench would be installed north of Artesia Avenue and would not encroach into the Fullerton Municipal Airport's property, which is south of Artesia Avenue. Construction activities associated with the installation of the braced trench are detailed in Section 2.10.5.3, Trench Construction. As discussed in Section 3.9, Geology, Soils, Seismicity, and Paleontological Resources, of the of the Draft EIR/EIS under Impact GSSPR-1, these activities would not result in inducement of seismic faulting, extraction of substantial groundwater, or creation of unstable seismic conditions or stresses in the Earth's crust. In addition, as detailed under Impact GSSPR-6, any dewatering activities necessary as part of the braced trench would not result in subsidence, because construction of the Shared Passenger Track Alternatives incorporate GEO-IAMF#1, Geologic Hazards, which requires controlling and minimizing groundwater withdrawal. Furthermore, the Authority has incorporated other IAMFs into the alternatives to avoid, reduce, or minimize potential impacts relating to geology and soils. These include, but are not limited to, GEO-IAMF#10, Geology and Soils, which requires conformance with guidelines specified by relevant transportation and building agencies to account for soil properties during project design and construction (Impact GSSPR-2 and Impact GSSPR-6); and GEO-IAMF#7, Evaluate and Design for Large Seismic Ground

Shaking, which requires the Authority to document how the most recently updated California Department of Transportation (Caltrans) seismic design criteria were used in the design of HSR structures supported in or on the ground (Impact GSSPR-2 and Impact GSSPR-6). Incorporation of the aforementioned IAMFs addresses potential off-site geotechnical impacts associated with the braced trench, such as ground settlement, cracking, or structural damage on the Fullerton Municipal Airport.

The commenter states the Draft EIR/EIS fails to mention preparation of a Construction Safety and Phasing Plan. Per Federal Aviation Administration (FAA) guidelines, a Construction Safety and Phasing Plan is required for construction or maintenance activities occurring on airport property, or for projects that penetrate navigable airspace. Construction and operation of the HSR project would not meet either of these criteria, and therefore a Construction Safety and Phasing Plan would not be applicable. However, the Draft EIR/EIS does evaluate potential interference with aviation safety under Impact SS-10. As detailed therein, construction of the Shared Passenger Track Alternatives includes SS-IAMF#5, Aviation Safety. SS-IAMF#5 requires the Authority or the Authority-designated contractor to submit construction plans, information, or both to FAA as part of FAA's Form 7460-1, pursuant to 14 Code of Federal Regulations (CFR) Part 77, and implement measures required by FAA to ensure continued safety of air navigation during HSR construction and operation. FAA's Form 7460-1 process requires a certain level of detail regarding construction methods, construction equipment and heights, and construction operating areas in order for FAA to conduct its review and approval. The Authority will provide this information to FAA in the future as project design advances. The Authority has also incorporated AQ-IAMF#1, Fugitive Dust Emissions; and HMW-IAMF#4, Known, Suspected, and Unanticipated Environmental Contamination, which both include dust control provisions. Additionally, with respect to potential hazards from displaced soil or debris, the Authority has incorporated HYD-IAMF#3, Prepare and Implement a Construction Stormwater Pollution Prevention Plan (SWPPP), which requires BMPs, including soil stabilization, and BIO-IAMF#11, which requires BMPs, including trash control and removal.

With respect to interference of underground utilities, the locations of the potential utility conflicts adjacent to Fullerton Municipal Airport are illustrated in Drawing Numbers UT-C1586, UT-C1587, and UT-C1588 of Volume 3.4 of the Preliminary Engineering for Project Definition (PEPD). Therefore, the Authority has accounted for the underground utilities adjacent to the airport, but will continue to coordinate with the city and utility owners to ensure that all utility conflicts are adequately resolved. In addition, as discussed in Section 3.6, Public Utilities and Energy, Section 3.6.6.3, Project Impacts, of the Draft EIR/EIS, construction of the Shared Passenger Track Alternatives include PUE-IAMF#3, Public Notifications (refer to Impact PU&E-6). PUE-IAMF#3 requires the construction contractor to coordinate schedules for utility relocations, new connections, and protection in place with the utility owner to ensure that the project will not result in prolonged disruption of services. Therefore, installation of the braced trench would not result in interference with underground utilities adjacent to the Fullerton Municipal Airport.

With respect to potential impacts related to hazards and hazardous materials, refer to response to comment #1535 below. Section 3.13, Station Planning, Land Use, and Development, Section 3.13.3, Consistency with Plans and Laws, of the Draft EIR/EIS addresses the braced trench's inconsistency with the Fullerton Municipal Airport's land use plan.

22.32.7 1485

Section 3.11.6.3, Project Impacts, of the Draft EIR/EIS provides that construction of the Shared Passenger Track Alternatives will include incorporation of SS-IAMF#5 (refer to Impact SS-3). SS-IAMF#5 requires the Authority or the Authority-designated contractor to submit construction plans, information, or both to FAA, pursuant to 14 CFR Part 77, which may include the location of planned HSR construction and construction staging areas within and adjacent to the boundary of the Fullerton Municipal Airport, the types and height of proposed equipment, and planned time/duration of construction, to ensure construction within and adjacent to the boundary of Fullerton Municipal Airport does not intrude into imaginary surfaces. Imaginary surfaces are defined in 14 CFR Part 77.9(b) as airspace surfaces that are used to identify obstructions to air navigation. In effect, these surfaces are used to delineate a three-dimensional buffer surrounding an airport to protect the airspace from any

hazards to air navigation. The Authority is aware of and will be submitting FAA Form 7460-1 applications to the FAA, which triggers the formal intradepartmental review and approval of the project, which includes the Runway Protection Zone (RPZ) and airspace standards, and among other FAA criteria.

22.32.8 1486

As described in Draft EIR/EIS Section 3.8, Hydrology and Water Resources, Impact HWR-5, temporary impacts on groundwater volume, quality, and recharge may occur during construction related dewatering activities, including the braced trench. As described in Section 3.9, excavation at the Fullerton trench, planned to depths of approximately 30 feet below ground surface, is the only area in the project footprint where construction is anticipated to encounter groundwater. Groundwater extraction along the project section is limited in the Orange County Coastal Plain area. Excavations for the planned structures would likely not exceed 10 feet in depth with the exception of underpasses, the trench at Fullerton Municipal Airport, and utilities, which could be up to 30 feet deep. Groundwater could be encountered within the deeper portion of the excavation. HYD-IAMF#3, Prepare and Implement a Construction Stormwater Pollution Prevention Plan; GEO-IAMF#1A, Geologic Hazards: Groundwater Withdrawal; GEO-IAMF#1B, Geologic Hazards: Unstable Soils; and GEO-IAMF#1 will minimize impacts on groundwater quality and volume during construction. These measures include the requirement to perform dewatering according to the applicable Regional Water Quality Control Board (RWQCB) dewatering permit. The RWQCB-approved dewatering permit will have measures to avoid and minimize temporary impacts related to groundwater recharge and supply. Permanent dewatering or seepage is not anticipated. Soil conditions at the low point within the trench alignment will be evaluated during the detailed design phase. Project-specific BMPs, such as infiltration basins, will be developed and applied to allow infiltration of runoff and groundwater recharge.

In addition, Section 3.8.6.3, Project Impacts, of the Draft EIR/EIS provides that construction of the Shared Passenger Track Alternatives, including the braced trench, will include incorporation of HYD-IAMF#3 (refer to Impact HWR-3). HYD-IAMF#3 requires the Authority-designated contractor to comply with the State Water Resources Control Board Construction General Permit by preparing and implementing a SWPPP prior to commencement of any ground-disturbing activities. The Construction SWPPP will propose BMPs to minimize potential short-term increases in sediment transport caused by construction, including erosion control requirements, stormwater management, and channel dewatering for affected stream crossings. Impact HWR-3 concludes that incorporation of HYD-IAMF#3 will prevent the introduction of substantial quantities of pollutants, including pollutants that will increase existing impairments listed under Clean Water Act Section 303(d), degradation of beneficial uses, or exceedances of water quality criteria. Because installation of the braced trench will be subject to HYD-IAMF#3, any dewatering activities necessary as part of the braced trench would not result in silt, sediment, or construction-related contaminants in the surface waters during construction.

With respect to the potential for encountering contaminated soil, the Authority prepared the *Los Angeles to Anaheim Project Section Supplement to the Hazardous Materials and Wastes Technical Report*, which specifically evaluated potential environmental concern (PEC) sites in and adjacent to the footprint of the Fullerton trench. There are three PEC sites adjacent to the footprint of the trench and, based on their current statuses and the historical land uses within the area, the Authority determined there is a minor (0–20 percent) proportion of hazardous versus nonhazardous waste anticipated to be encountered within the total volume of the spoils from the trench.

To address the potential impacts related to contaminated soil or groundwater, Section 3.10, Hazardous Materials and Wastes, Section 3.10.6.3, Project Impacts, of the Draft EIR/EIS provides that construction of the Shared Passenger Track Alternatives, including installation of the braced trench, will incorporate several IAMFs including, but not limited to, HMW-IAMF#4 (refer to Impact HMW-2). HMW-IAMF#4 requires the Authority, or its designated design contractor, to develop a soil management plan prior to completion of 30 percent design that incorporates information and data regarding known and suspected contamination obtained per HMW-IAMF#1, Property Acquisition Phase I and Phase II Environmental Site Assessments, Additional Preconstruction Investigations, and Associated Actions to Control Site Contamination (which requires completion of Phase I Environmental Site Assessments [ESA] and, if necessary, Phase II ESAs). The soil management plan

will include requirements for protection of human health and the environment to be implemented by the Authority-designated contractor during construction on sites at which contamination is or may be present. Because installation of the braced trench will be subject to HMW-IAMF#4, soil excavation and groundwater removal associated with the braced trench would not result in release of hazardous materials into the environment.

22.32.9 1487

Pursuant to Impact TR-6 in Section 3.2, Section 3.2.6.3, Project Impacts, of the Draft EIR/EIS, the width of Artesia Avenue following project implementation would still provide sufficient space to accommodate two vehicle lanes and two Class II lanes. With respect to Walnut Avenue, the project components would not affect the roadway width from Richman Avenue to Highland Avenue, where the City of Fullerton has planned for future widening of the existing Class II bicycle lanes. Where the project design includes narrowing of Walnut Avenue east of Harbor Boulevard, the city's existing sharrows and wayfinding signs would be reinstalled. Accordingly, the project design does not prevent the reinstallation of the existing or implementation of future bicycle facilities identified in The Fullerton Plan's Bicycle Element.

With respect to parking, as discussed under Impact TR-8 in Section 3.2.6.3 of the Draft EIR/EIS, the proposed Fullerton Metrolink/Amtrak Station modifications would require removal of approximately 27 parking spaces along the southern side of the project corridor, as well as a small number of on-street parking spaces. However, the Draft EIR/EIS concludes that the 1,321 parking spaces in the existing parking structure on the northern side of the corridor should be sufficient to accommodate passengers. The Draft EIR/EIS additionally notes that there are multiple paid parking structures nearby in downtown Fullerton and free parking options.

Based on the above, the Draft EIR/EIS evaluates the project section's consistency with The Fullerton Plan's Bicycle Element and potential parking impacts. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.10 1488

The proposed pedestrian connection to the modified Fullerton Metrolink/Amtrak Station from the southern side of the project corridor is depicted on Figure 2-65 of the Draft EIR/EIS. Additionally, further details are depicted on Drawing Numbers AR-B0701A to AR-J8702A of Volume 3.6 of the PEPD. The station plans in the Draft EIR/EIS are conceptual; at this phase of design, they are meant to illustrate the overall station programming and access. The station concepts would be refined in later phases of design, in coordination with the cities and stakeholders. As described in Section 3.13 of the Draft EIR/EIS, the Authority will incorporate LU-IAMF#1, Passenger Rail Station Area Development: General Principles and Guidelines; and LU-IAMF#2, Station Area Planning and Local Agency Coordination. LU-IAMF#1 and LU-IAMF#2 were revised in the Final EIR/EIS to clarify that they could be applied to both HSR stations and existing passenger rail stations that were modified or relocated. Refer to Final EIR/EIS Section 16.5.13, Section 3.13: Station Planning, Land Use, and Development, in Chapter 16 for a description of the edits to LU-IAMF#1 and LU-IAMF#2. These IAMFs commit the Authority to coordinating with the city on station area development while ensuring accessibility. The Authority will coordinate with the City of Fullerton as the project design advances as part of defining long-term maintenance roles and responsibilities.

22.32.11 1489

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Refer to responses to comments #1479 and #1480 above.

The Draft EIR/EIS provides where a significant impact would occur from the Fullerton Interlocker and require mitigation. For instance, Table 3.4-22 in Section 3.4.7.6 of the Draft EIR/EIS provides that construction of the Fullerton Interlocker would be subject to N&V-MM#1 to address construction noise impacts on sensitive receivers and N&V-MM#2 to address construction vibration impacts on sensitive receivers. Similarly, Table 3.10-7 in Section 3.10 of the Draft EIR/EIS provides that the Fullerton

Metrolink/Amtrak Station, which would include the Fullerton Interlocker components, would be subject to HMW-MM#1, Limit Use of Extremely Hazardous Materials Near Schools During Construction, to address use of extremely hazardous materials near schools during construction.

With respect to the Draft EIR/EIS transportation mitigation measures, Section 3.2.7.9 of the Draft EIR/EIS provides that none of the early action projects would result in significant impacts, because impacts on intersections and roadway segments would not be attributable to a specific early action project. However, this was meant to refer only to TRAN-MM#1, Modify Traffic Signal Controls; to TRAN-MM#4, Add Exclusive Turn Lanes to Intersections; as well as TRAN-MM#7, Add Lane to State Route 57/Westbound Katella Avenue Southbound On-Ramp, because these mitigation measures serve to address delay effects on intersections, roadway segments, or freeway ramps. Implementation of the Fullerton Interlocker components would be subject to TRAN-MM#6, Prepare Track Construction Work Window Plan, which requires the Authority to coordinate with freight and passenger rail agencies and operators to identify specific work windows for track construction activities that minimize disruption to freight and passenger rail services. Section 3.2.7.9 of the Draft EIR/EIS has been corrected in the Final EIR/EIS to specify the early action projects that would be subject to TRAN-MM#6. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for the revision.

Regarding the IAMFs, as detailed in Section 2.6.2.4, Impact Avoidance and Minimization Features, of the Draft EIR/EIS, the Authority has committed to programmatic IAMFs that consist of features that the Authority will incorporate during project design and construction of the HSR system. The IAMFs described in the Draft EIR/EIS are considered project components of the project section; therefore, implementation of the Fullerton Interlocker components would be subject to all IAMFs discussed in the Draft EIR/EIS.

22.32.12 1490

The comment makes assertions about how Fullerton-related impacts are presented in the Draft EIR/EIS, appears to assume that HSR-related infrastructure would be maintained at city expense, and highlights a typographical error in Section 3.13.

With regard to the presentation of impacts and mitigation measures, refer to the responses to comments #1479 above and #1495 below. Furthermore, contrary to the comment's assertion, each subsection of Chapter 3 separately identifies any prospective additive impacts or need for mitigation measures associated with either of the two optional HSR station options considered (Fullerton and Norwalk/Santa Fe Springs).

However, as noted in Draft EIR/EIS Section 2.6.3.5, Freight or Passenger Railroad Modifications, and Section 2.6.4, Shared Passenger Track Alternative B, both Shared Passenger Track Alternatives (A and B) would include modifications to Fullerton's existing Metrolink/Amtrak Station (refer to Figure 2-65). This is distinct from the optional "Fullerton HSR Station Option," depicted on Figure 2-80. Accordingly, the proposed modifications (Figure 2-65) are considered along with other elements of the two Shared Passenger Track Alternatives (A and B). Each subsection of the Draft EIR/EIS separately considered the potential additive effects of the optional Fullerton HSR Station Option (Figure 2-80) and identifies the need for any additional mitigation. No update to the Draft EIR/EIS is thus warranted.

Regarding the assertion that HSR-related infrastructure in Fullerton would be maintained at the expense of the City of Fullerton, the Authority respectfully disagrees. Draft EIR/EIS Section 2.8.3, Maintenance Activities, outlines the maintenance activities the Authority would undertake. Draft EIR/EIS Section 6.3, Operation and Maintenance Costs, identifies estimated operations and maintenance (O&M) costs. Nowhere in the Draft EIR/EIS or the Authority's planning documents does the Authority assume local entities would assume maintenance costs for HSR facilities built and operated in their communities.

Regarding the number of parking spaces associated with the Fullerton HSR Station Option, the Authority thanks the commenter for pointing out a typographical transcription error in the Draft EIR/EIS. Final EIR/EIS Section 16.5.13 in Chapter 16 reflects revisions to the text of Impact LU-6 (including text on page 3.13-65 and a row of Table 3.16-6) to reflect that the new Fullerton HSR parking structure would provide 570 (not 1,114) stalls. On this same subject, the Final EIR/EIS also

notes that the existing parking structure on the northern side of the corridor has 1,321 spaces potentially available. Draft EIR/EIS Figure 2-80 correctly labeled the number of proposed parking spaces (570), so no change to that figure is necessary.

22.32.13 1491

Refer to Standard Response LAA-Response-GENERAL-07: Construction Schedule, in Chapter 18.

The dates in Table 2-19 of the Draft EIR/EIS that reflect “HSR station(s) and station relocations” are the construction-period assumptions for the proposed improvements under the Shared Passenger Track Alternatives; however, footnote 2 was intended to clarify that these same construction-period assumptions were used to analyze the construction-period impacts of the HSR station options at the Norwalk/Santa Fe Springs and Fullerton stations. If the Fullerton HSR Station Option were selected, these additional HSR components could also be built within the same timeframe as the station modifications assumed for the Shared Passenger Track Alternatives.

Footnote 2 in Table 2-19 has been revised in the Final EIR/EIS to provide the necessary clarification for the assumptions used for the HSR station options’ analyses. Refer to Section 16.4, Chapter 2: Alternatives, in Chapter 16 of the Final EIR/EIS for this revision.

22.32.14 1492

Table 2-19 in Section 2.10.1, Project Delivery, and Section 2.10.4.1, Operational Right-of-Way, have been revised to include conducting ESAs in the list of preconstruction activities. Please refer to Section 16.4 in Chapter 16 of the Final EIR/EIS for these changes.

Additionally, as detailed under Impact HMW-4 of Section 3.10 in the Draft EIR/EIS, the Authority will incorporate various IAMFs to avoid or reduce potential impacts associated with construction near PEC or Cortese List sites. Among the IAMFs that the Authority will incorporate, HMW-IAMF#1 requires preparation of Phase I ESAs during the right-of-way acquisition phase in accordance with standard ASTM International (ASTM) methodologies, ASTM E 1527-21, or more recent applicable requirements. Parcels that require a Phase II ESA (e.g., soil, groundwater, soil vapor subsurface investigations) will also be identified as part of HMW-IAMF#1.

22.32.15 1493

Text in Section 2.10.4.1 of the Draft EIR/EIS indicating the potential use of temporary concrete batch plants was included erroneously. Project construction would not require the use of temporary batch plants. Analysis in the Draft EIR/EIS instead assumed that concrete would be purchased and provided via vendors near the project alignment. For example, there is Bender Ready Mix, Inc. in Santa Fe Springs and two Associated Ready Mix Concrete locations, one in Los Angeles and one in Downey (these are approximately 5 miles from the project alignment). Air quality modeling for concrete vehicles assumed a much greater distance (10.20 miles per one-way trip). Accordingly, text indicating temporary batch plants has been deleted, as presented in Section 16.4 in Chapter 16 of the Final EIR/EIS.

22.32.16 1494

The Draft EIR/EIS evaluates potential temporary impacts on freight and passenger rail operations during construction under Impact TR-8 in Section 3.2.6.3 of the Draft EIR/EIS. As discussed therein, work involving track shifting or realignment would be minor and consist of moving the existing track and then reconnecting it to the rest of the mainline. For more extensive track realignments, the new tracks would be built first in the new and permanent location while the existing tracks would remain in place and operational. Track construction activities would require temporary closures. In some areas with heavy construction activities, such as for the new grade separations, shoofly tracks would be built, which would allow existing freight and passenger trains to bypass the construction areas entirely. The Authority identified footprints in areas where the shoofly tracks are preliminarily anticipated to be located, and these footprints were included as part of the project footprint evaluated in the Draft EIR/EIS. The Authority will coordinate with right-of-way owners and other stakeholders as project design advances to determine the final locations of the shoofly tracks. Upon completion of the new mainline tracks, the temporary shoofly tracks would be removed. The Authority will incorporate

TR-IAMF#9, Protection of Freight and Passenger Rail During Construction; TR-IAMF#13, Stakeholder Coordination with Transportation Agencies; and TR-IAMF#11, Maintenance of Transit Access. TR-IAMF#9 provides that the project contractor will repair any structural damage to railways that occurs during the construction period. TR-IAMF#13 requires the Authority to work closely with all agencies that provide freight and passenger rail services and bus services, or maintain operating rights within the corridor to ensure that the design, construction, and operation of the project section do not adversely affect existing and planned rail service. TR-IAMF#11 requires the project contractor to identify specific measures in the Construction Management Plan to maintain passenger rail access and provide safe and adequate access for passenger rail users during construction. The Authority will additionally implement TRAN-MM#6, which will reduce adverse effects on freight and passenger rail services during project construction by requiring the Authority to coordinate with freight and passenger rail agencies and operators to identify specific work windows for track construction activities, including construction staging, that minimize disruption to freight and passenger rail services within the project corridor to the maximum extent feasible. The Draft EIR/EIS concludes that incorporation of TR-IAMF#9, TR-IAMF#13, and TR-IAMF#11, and implementation of TRAN-MM#6, would reduce adverse effects on freight and passenger rail services during project construction. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.17 1495

With respect to how the Draft EIR/EIS provides site-specific analysis of potential impacts and the format of impact discussions related to Shared Passenger Track Alternative A, refer to response to comment #1479 above.

The comment refers to California Public Resources Code 21189.80(b). This statute is part of Chapter 7 of CEQA on infrastructure projects, which provides certain streamlining benefits to “environmental leadership development projects.” Designation as an environmental leadership development project requires an application to the Governor’s Office of Land Use and Climate Innovation as well as approval by the Governor. The Authority has not applied to the Governor’s Office of Land Use and Climate Innovation for this designation. Therefore, the provisions of Chapter 7 of CEQA do not apply. Nevertheless, the Authority has fulfilled CEQA’s general requirements of providing the public with an opportunity to review and comment on the environmental consequences of the project and proposed measures to mitigate significant environmental impacts.

With respect to the Draft EIR/EIS mitigation measures, the measures include a description of when the mitigation will be implemented, the party responsible for completing the requirements set forth by the mitigation, and the specific performance standards that must be achieved. NEPA and CEQA do not require that mitigation measures rely on local agencies for enforcement. Mitigation for the purposes of NEPA means measures that avoid, minimize, or compensate for effects caused by a proposed action or alternatives described in the environmental document or record of decision and have a nexus to those effects. Pursuant to State CEQA Guidelines Section 15126.4(a)(1)(B), the agency must commit itself to the mitigation, adopt specific performance standards the mitigation will achieve, and identify the types of potential actions that can feasibly achieve the performance standards. The Draft EIR/EIS mitigation measures comply with these requirements and are, therefore, adequate.

The Authority coordinated with the City of Fullerton during preparation of the Draft EIR/EIS. Refer to Draft EIR/EIS Appendix 9-A, Comprehensive List of Public and Agency Meetings, which notes that the Authority conducted more than 25 meetings with Fullerton staff and elected officials between 2007 and 2025. The Draft EIR/EIS and its associated technical reports and appendices have also been made available to the City of Fullerton. The Authority is responding to the City of Fullerton’s comments on the Draft EIR/EIS as part of this Final EIR/EIS. Therefore, the City of Fullerton has been provided the opportunity to review and comment on the Draft EIR/EIS and participate meaningfully on the project.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.18 1496

Table 3.2-20 has been revised in the Final EIR/EIS to state the affected roadway as being Gilbert Street and not Dale Street. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.32.19 1497

The Draft EIR/EIS evaluation of temporary impacts on pedestrian, bicycle, and transit facilities during construction under Impact TR-5 in Section 3.2.6.3 of the Draft EIR/EIS lists the roadways that would experience temporary construction-related traffic effects from lane closures, road closures, and detours. With respect to the proposed Fullerton Metrolink/Amtrak Station modifications, the Draft EIR/EIS identifies Highland Avenue, Walnut Avenue, and Harbor Boulevard as the affected roadways, because a new railroad bridge would be built over Highland Avenue, Walnut Avenue would be realigned, and a new platform would be built over Harbor Boulevard. Unlike these roadways, the proposed station modifications would not occur over or to Santa Fe Avenue or Pomona Avenue. As such, Santa Fe Avenue and Pomona Avenue are not identified in the list of roadways anticipated to experience lane closures, road closures, and detours. As detailed under Impact TR-5, the Authority will incorporate TR-IAMF#2, Construction Transportation Plan; TR-IAMF#4, Maintenance of Pedestrian Access; TR-IAMF#5, Maintenance of Bicycle Access; TR-IAMF#11; TR-IAMF#12, Pedestrian and Bicycle Safety; and TR-IAMF#13 to avoid or minimize the potential temporary effects on pedestrian and bicycle facilities and transit during project construction. These IAMFs would prevent or reduce impacts on pedestrian and bicycle facilities on roadways along the project corridor, including Santa Fe Avenue and Pomona Avenue. Therefore, the analyses and conclusions under Impact TR-5 are adequate. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.20 1498

The commenter refers to the Draft EIR/EIS analysis of continuous permanent impacts on pedestrian, bicycle, and transit facilities during operations under Impact TR-13 in Section 3.2.6.3 of the Draft EIR/EIS. Potential impacts on parking at station areas are addressed in the Draft EIR/EIS under Impact TR-8, not Impact TR-13. Refer to response to comment #1487 above.

22.32.21 1499

Refer to response to comment #1487 above.

22.32.22 1500

The early action projects subsection in each individual environmental section of the Draft EIR/EIS assesses if, based on the site-specific context of each early action project, the project section's mitigation would apply to each early action project. As discussed in Section 3.2.7.9 of the Draft EIR/EIS, the permanent roadway modifications would result in impacts on some intersections and roadway segments, but these are not attributable to a specific early action project. Similarly, a specific early action project does not require the addition of a lane to the State Route 57/westbound Katella Avenue southbound on-ramp. However, Section 3.2.7.9 of the Draft EIR/EIS has been updated in the Final EIR/EIS to provide that all early action projects would be subject to TRAN-MM#6. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.32.23 1501

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 5 COMMUNITY-01: Need for Analysis of Impacts on Minority and Low-Income Communities, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

The comment asserts a loss of operational capacity at the Fullerton Metrolink station that would cause environmental impacts, including disproportionate impacts on minority and low-income communities.

Refer to the response to comment #1502 below regarding the Draft EIR/EIS's analysis of temporary construction impacts (including minor impacts on rail operation).

Refer to the response to comment #1509 below regarding the project's improvements in operational efficiency within the Fullerton Metrolink/Amtrak Station area.

Regarding the prospect of disproportionate impacts on minority and low-income communities, the Draft EIR/EIS included extensive analysis. The intent of Chapter 5, Community Analysis, is to evaluate disproportionately high and adverse effects (DHAE) on minority and low-income communities within RSAs. Section 5.4.3, Disadvantaged Communities, describes how the Authority incorporated CalEnviroScreen 4.0 criteria. Chapter 5's analyses build upon the analyses in Chapter 3, such as Section 3.3. Each section of Chapter 3 evaluates impacts on all properties in the RSA for that topic. Chapter 5 examines the potential of these impacts to disproportionately affect minority or low-income communities, and identifies affected block groups and neighborhoods within those RSAs.

Block groups immediately south of Truslow Avenue in Fullerton include 60590116022, 60590116023, 60590116011, 60590116016, 60590112004, and 60590114034. Table 5-5 lists the block groups and whether the block group is defined as low-income or minority. Some of these block groups correspond with Senate Bill 535 disadvantaged communities as identified on CalEnviroScreen 4.0 (census tracts 6059011601, 6059011602, and 6059011403). Impacts on these block groups include continuous permanent impacts on roadway segments (Impact TR-12), operational noise (Impact N&V-4), operational vibration (Impact N&V-5), construction near PEC sites or Cortese List sites (Impact HMW-4), handling of hazardous materials within 0.25 mile of a school (Impact HMW-6), effects on visual quality during operations (Impact AVQ-3), business displacements and relocations (Impact SO-3), and diminished access to or established use of recreational resources (Impact PR-4). Chapter 5 summarizes these impacts at the block group level; topically corresponding sections of Chapter 3 provide further detail on specific impacts. Block group 60590116022 would experience a DHAE from operational vibration and construction near PEC sites or Cortese List sites (refer to Table 5-35).

The comment further asserts that the Draft EIR/EIS does not address the potential loss of operational capacity at Fullerton Station. However, the Draft EIR/EIS assesses such potential losses during both construction and operation. Refer to Impacts TR-4, TR-6, and TR-8 for assessment of construction-period impacts. For assessments of operational-period impacts, refer to Impacts TR-13, TR-15, SO-1, and SO-10. Furthermore, as stated in Section 3.2.6.3 of the Draft EIR/EIS, with implementation of TRAN-MM#6, the project's CEQA impacts on passenger and freight rail operations during construction would be less than significant.

For discussion of air quality impacts related to changes at Fullerton Station, refer to response to comment #1504 below. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.24 1502

Refer to Standard Response LAA-Response-Section 3.3 AQ-01: Construction Emission Impacts, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

The comment incorrectly asserts that the Draft EIR/EIS does not address temporary construction impacts (transportation and air quality) related to Fullerton Station modifications under the Shared Passenger Track Alternatives, or the HSR station option analysis. These impacts are fully covered under the relevant impact discussions of the Draft EIR/EIS in Section 3.2.6, Environmental Consequences, and Section 3.3.6, Environmental Consequences.

As discussed in Impact TR-8 of the Draft EIR/EIS, project construction is anticipated to have minimal impacts on freight and passenger rail operations. Although modifications to the Fullerton Metrolink/Amtrak Station would require a portion of the southernmost platform to be closed to build the new Metrolink/Amtrak center platform, the existing tracks would remain in place and operational during construction. Metrolink would continue to serve the remaining eastern portion of the platform; during

peak periods, there could be passenger congestion at the shortened platform. When construction of the new Metrolink/Amtrak center platform and new southernmost track is complete, a short-term track closure would be required to connect the new tracks to the existing tracks. The short-term track closures would be scheduled during times to minimize impacts on service, such as on weekends, and trains could still operate on the other tracks so that service is maintained with limited disruptions. There would not be a need to reroute passenger rail services, nor would locomotive idling occur.

It is not anticipated that there will be increased vehicle congestion and queuing around the existing station during construction. The existing parking structure on the northern side of the corridor would be unaffected, but some of the parking along the southern side of the corridor would be removed during construction (approximately 27 spaces, as well as a small number of on-street parking spaces). The existing parking structure on the northern side of the corridor has 1,321 spaces. It is expected to have sufficient capacity to accommodate passengers, and there are also multiple paid parking structures nearby in downtown Fullerton, as well as free parking options.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.25 1503

The segments referenced in Draft EIR/EIS Section 3.3 were only used in the ambient air quality analysis and health risk assessment modeling. As depicted in Draft EIR/EIS Figure 3.3-2, Fullerton Station was not close to the selected segment locations. However, the construction mass emission analysis included in Impact AQ-1 evaluated each of the project alternatives as well as the HSR station options in their entirety. In the Draft EIR/EIS, Table 3.3-19 listed the tons per year and pounds per day associated with construction of Shared Passenger Track Alternative A; Table 3.3.25 provided similar information for Shared Passenger Track Alternative B. Refer to Section 16.5.3, Section 3.3: Air Quality and Global Climate Change, in Chapter 16 of the Final EIR/EIS for updates to each of these tables reflecting updated mass emissions modeling associated with the inclusion of Emission Factors 2021 (EMFAC2021) adjustment factors.

In the Draft EIR/EIS, Table 3.3.20 summarizes emissions associated with construction of Shared Passenger Track Alternative A plus the Fullerton HSR Station Option. Table 3.3-26 provides the same information for construction of Shared Passenger Track Alternative B with the Fullerton HSR Station Option. (Because these scenarios evaluated project emissions relative to South Coast Air Quality Management District [SCAQMD] daily thresholds, the above-referenced EMFAC2021 adjustment factors were not relevant.)

Please refer to the response to comment #1502 above for a description of the potential loss of operational capacity at Fullerton Station associated with the temporary construction impacts. Because project construction is anticipated to have only minimal impacts on freight and passenger rail operations at Fullerton Station, HSR construction will not introduce the significant temporary emissions described in the comment.

22.32.26 1504

Refer to Standard Response LAA-Response-Chapter 5 COMMUNITY-01: Need for Analysis of Impacts on Minority and Low-Income Communities, in Chapter 18.

The commenter incorrectly asserts that CEQA requires the evaluation of disadvantaged communities. State CEQA Guidelines Section 15126.2(d) does not mention disadvantaged communities and instead addresses significant, irreversible environmental changes that would result from implementing the project.

Refer to the response to comment #1501 above for information on the Draft EIR/EIS's analysis of DHAEs on minority and low-income communities in Chapter 5, including both Senate Bill 535 disadvantaged communities and particular census block groups south of Truslow Avenue in Fullerton as cited in the comment. The response to comment #1501 also demonstrates that the Draft EIR/EIS assessed changes to rail operational capacity during both construction and operation.

Refer to the response to comment #1502 above for information on how construction would not result in increased train congestion and idling. Additionally, as discussed in Section 3.3, project operations

would not include the use of any diesel-fueled locomotives. The HSR trains would be fully electric, and therefore would not emit any diesel particulate matter. Moreover, as stated in Draft EIR/EIS Table 3.3-31, the project would result in significant decreases of operational particulate matter emissions within the air basin (both less than or equal to 10 microns in diameter and less than or equal to 2.5 microns in diameter).

Cumulative impacts are discussed in Section 3.19, Cumulative Impacts, and Section 5.6.3.11, Cumulative Effects. The analysis in Chapter 5 builds on the analyses in Chapter 3, such as Section 3.3 and Section 3.2. Chapter 5 examines whether any of these impacts would disproportionately affect minority or low-income communities, and identifies impacts on specific census block groups. Section 5.4.3 describes how the Authority incorporated CalEnviroScreen 4.0 criteria. Section 5.6.3.1, Transportation, describes transportation impacts on low-income and minority communities. Section 5.6.3.2, Air Quality, describes air quality impacts on low-income and minority communities. Section 5.7, Summary of Disproportionately High and Adverse Effects Prior to Consideration of Measures to Minimize Harm, provides a summary of DHAEs and affected census block groups.

Based on the foregoing, the comment does not result in the need for any revisions to the Draft EIR/EIS.

22.32.27 1505

Refer to Standard Response LAA-Response-Chapter 5 COMMUNITY-01: Need for Analysis of Impacts on Minority and Low-Income Communities, in Chapter 18.

Refer to the responses to comments #1501 and #1504 above. As reiterated in the response to comment #1501, the Authority respectfully disagrees with the assertion restated in this comment that the Draft EIR/EIS failed to analyze changes in platform capacity during construction and operation. As also stated in the responses to comments #1501 and #1502 above and #1509 below, the proposed changes at Fullerton Station will not substantially affect operational or platform capacity.

22.32.28 1506

Refer to Standard Response LAA-Response-Chapter 5 COMMUNITY-01: Need for Analysis of Impacts on Minority and Low-Income Communities, in Chapter 18.

Refer to responses to comments #1502 above and #1509 below.

Regarding points 1 to 3 from the comment, refer to the responses to comments #1501 and #1504 above for discussion of the evaluation of the project's potential for DHAE on minority and low-income communities, including considerations of potential changes in operational capacity.

Regarding cumulative impacts (point 4), the Final EIR/EIS reflects revisions to the text of Draft EIR/EIS Section 3.19. Specifically, Final EIR/EIS Section 16.5.19, Section 3.19: Cumulative Impacts, in Chapter 16 indicates revisions to Section 3.19.4.2, Air Quality and Global Climate Change, to include a land development project in Fullerton that could contribute to cumulative impacts in the air basin. However, no change to any cumulative impact conclusion was warranted.

22.32.29 1507

This comment summarizes the concerns detailed in comments #1508 through #1518 below. The responses to those comments demonstrate that the Draft EIR/EIS adequately provides a factually supported and comprehensive assessment of noise and vibration impacts as required by CEQA, and therefore no revisions to the Draft EIR/EIS have been made.

In particular, it should be noted that any loss of operational or platform capacity at Fullerton Station would not result in any significant increase in noise or vibration. Furthermore, the analysis evaluated potential noise and vibration impacts at all nearby sensitive receptors, including disadvantaged residential areas such as those immediately south of Truslow Avenue. This area falls within the noise and vibration RSAs and, therefore, was included in the analysis. As listed in Table 3.4-16 and Table 3.4-18 of the Draft EIR/EIS, sensitive receptors in this area were considered between Harbor Boulevard and Fullerton Junction and between Fullerton Junction and Orangethorpe Avenue.

Chapter 5 examines the potential of these impacts to disproportionately affect minority or low-income communities, and identifies affected block groups and neighborhoods within those RSAs. Refer to response to comment #1501 above for discussion of impacts on minority and low-income communities south of Truslow Avenue. As discussed in more detail in response to comment #1501, block group 60590116022, immediately south of the HSR alignment and Truslow Avenue, would experience a DHAE from operational vibration (refer to Table 5-35 in Chapter 5 of the Draft EIR/EIS).

22.32.30 1508

The Shared Passenger Track Alternatives' proposed modifications to the Fullerton Metrolink/Amtrak Station would add a fourth mainline track on the southern side of the corridor as the tracks proceed through the station area, which would also necessitate shifting of the existing freight tracks. These project modifications are accounted for in Section 3.4 of the Draft EIR/EIS. Additionally, the Draft EIR/EIS's operational noise assumptions, which are detailed in Section 3.4.4.4, Methods for Impact Analysis, are based on applicable criteria established by the Federal Railroad Administration (FRA) and Federal Transit Administration (FTA). Pursuant to the criteria set forth by these agencies, Table 3.4-16 and Table 3.4-17 under Impact N&V-4 in Section 3.4.6.3, Project Impacts, of the Draft EIR/EIS provide the distances of the nearest sensitive receivers from the nearest track under proposed conditions and identify the number of receivers that would be affected by operational noise. Similarly, Table 3.4-18 and Table 3.4-19 under Impact N&V-5 account for the proposed improvements and identify the number of receivers that would be affected by operational vibration.

The frequency and duration of noise and vibration from ancillary sources such as horns, bells, braking, coupling/uncoupling, and locomotive idling would not increase significantly because of changes in Fullerton's track and platform geometry. With respect to ancillary noise and vibration sources attributable to freight trains and non-HSR passenger trains, the proposed modifications to the Fullerton Metrolink/Amtrak Station would not increase the number of freight and non-HSR passenger trains that currently proceed through the station. Therefore, new ancillary noise and vibration sources attributable to freight and non-HSR passenger rail trains would not occur at the modified station. Regarding increases in ancillary noise levels generated by existing freight and non-HSR passenger rail trains, which would primarily involve noise from locomotive idling, the addition of the fourth mainline track through the Fullerton Metrolink/Amtrak Station and a new center platform would improve operational efficiency within the station area. As such, with the exception of the Amtrak once-a-day, long-distance trains that would continue to use the existing side platform at the station, all passenger trains would use the new center platform, thereby eliminating conflicting movements between freight and passenger trains that currently occur for northbound passenger trains that need to use the existing side platform on the northern side of the alignment. Therefore, ancillary noise from existing trains proceeding through the station would not increase, because a more operationally efficient station would result in less potential for idling.

With respect to noise from ancillary sources generated by new HSR trains at the modified station, the new HSR trains would not result in noise from braking, coupling/uncoupling, or idling, because the HSR trains would not stop at the modified station. Therefore, the introduction of new HSR trains, as facilitated by the modified station, would not result in increased noise from braking, coupling/ uncoupling, or idling. With respect to noise from horns, the HSR trains would not require use of horns in the area for at-grade crossings, because at-grade crossings would not occur in the station area. The new HSR trains would emit noise from their propulsion equipment and the wheel-rail interface as the HSR trains pass through the modified station; however, as detailed in Section 4.3.1 of the *Los Angeles to Anaheim Project Section Noise and Vibration Technical Report*, such noise sources were incorporated as part of the methods for evaluating noise impacts. Overall, based on the above, the frequency and duration of noise from ancillary sources would not increase significantly because of changes in Fullerton's track and platform geometry.

Furthermore, supplementary noise and vibration modeling, source-path-receiver analysis, and vibration propagation modeling for these sources was not required because train operations would be the dominant source of noise and vibration. In particular, although train horns are a "high-decibel" source, their use would be limited to emergency situations. Noise and vibration from the other

sources would be sporadic and would not substantially contribute to the project noise and vibration exposure at nearby sensitive receptors.

As detailed in the Draft EIR/EIS, the Shared Passenger Track Alternatives and Fullerton HSR Station Option would not result in potential impacts on sensitive receivers in proximity to the Fullerton Metrolink/Amtrak Station. Therefore, no significant noise or vibration impacts would result from changes in Fullerton's track and platform after implementation of the project alternatives. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.31 1509

With regard to the claim that the EIR/EIS ignores that N&V-MM#3, Implement California High-Speed Rail Project Noise Mitigation Guidelines, and N&V-MM#4, Implement Operational Vibration Mitigation Measures, are not feasible in downtown Fullerton, these measures are related to operational noise and vibration impacts. Because no severe noise impacts or vibration impacts from project operations were identified in Fullerton, the application of N&V-MM#3 and N&V-MM#4 to the Fullerton Metrolink/ Amtrak Station area is not required.

With respect to project construction, as described in N&V-MM#1 and N&V-MM#2 in Section 3.4 of the Draft EIR/EIS, measures will be implemented as required to mitigate potential noise and vibration impacts from construction activities. Site-specific construction noise and vibration analysis will be carried out during later phases of project design when detailed construction plans are available, and appropriate noise-monitoring and mitigation actions will be incorporated during construction, as needed, to account for operational constraints. In addition, it should be noted that Section 3.2.6.3 of the Draft EIR/EIS states that with implementation of TRAN-MM#6, the impact under CEQA related to temporary impacts on passenger and freight rail operations during construction would be less than significant. Therefore, temporary noise or vibration impacts related to train operations during construction are not anticipated.

Finally, although the commenter notes reduced operational capacity limits and Fullerton's constrained station configuration, the addition of a fourth mainline track through the Fullerton Metrolink/Amtrak Station and a new center platform would actually improve operational efficiency within the station area. The addition of the fourth mainline track would aid in the rerouting of trains through the station (including staging areas) and the maintenance of headways. The improved operational efficiency at the station would also reduce the potential for noise exposure from nighttime idling by trains in the station area. Additionally, the Shared Passenger Track Alternatives would result in corridor-wide improvements to operational efficiency, because the project would include removal of existing BNSF Railway (BNSF) storage and support tracks throughout the project corridor, which would be replaced adjacent to the existing BNSF Los Angeles Intermodal Facility. This would result in improved operational efficiency for all cities along the project corridor.

No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.32 1510

Refer to responses to comments #1502 and #1509 above.

Additionally, because any operational and construction-related constraints imposed by the alternatives are expected to be minimal, they would not cause a significant increase in noise or vibration or limit effective mitigation measures. Furthermore, the analysis evaluated potential noise and vibration impacts at all nearby sensitive receptors, including disadvantaged residential areas. Disproportionate and cumulative effects on sensitive receptors are evaluated in Chapter 5 and Section 3.19, respectively, of the Draft EIR/EIS.

No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.33 1511

Refer to Standard Response LAA-Response-Section 3.4 N&V-02: Sound Barriers and other Noise Abatement, in Chapter 18.

Although site-specific assessments of construction noise and vibration impacts were not performed for the Draft EIR/EIS, potential impacts were identified in Section 3.4.6.3 of the Draft EIR/EIS for Fullerton and other communities based on the impact screening distances for construction activities included in Tables 3.4-13, 3.4-14, and 3.4-15. As described in N&V-MM#1 and N&V-MM#2, construction noise and vibration mitigation measures will be implemented as required. However, the EIR/EIS does not assume that mitigation can be implemented uniformly along the corridor. Rather, site-specific construction noise and vibration analysis will be carried out during project design when detailed construction plans are available and appropriate site-specific mitigation measures will be implemented during construction as needed to meet the project limits. This approach is consistent with State CEQA Guidelines Section 15126.4 and case law. Furthermore, as described in the response to comment #1510 above, because any operational and construction-related constraints imposed by the alternatives are expected to be minimal, mitigation measures related to Fullerton's constrained station configuration, such as rerouting trains away from sensitive receptors, staging trains farther from residences, maintaining normal headways to avoid backups, and preventing prolonged nighttime idling, would not be required.

Mitigation measures related to noise and vibration are discussed in Section 3.4.7, Mitigation Measures. Engineering feasibility of mitigation measures is only applicable to N&V-MM#3, Implement California High-Speed Rail Project Noise Mitigation Guidelines, when determining if a sound barrier is feasible and able to achieve between 5 and 15 decibels of exterior noise reduction. This analysis is presented in Section 3.4.7.3, N&V-MM#3: Implement California High-Speed Rail Project Noise Mitigation Guidelines, of the Draft EIR/EIS.

A cumulative impact analysis is included in Section 3.19. Disproportionate effects on sensitive receptors are evaluated in Chapter 5, Section 5.6.3.3, Noise and Vibration, and Section 5.7.

No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.34 1512

The noise and vibration analysis in Section 3.4 of the Draft EIR/EIS does not evaluate disproportionate impacts because these are addressed in Chapter 5. Chapter 5 examines the potential of these impacts to disproportionately affect minority or low-income communities, and identifies affected block groups and neighborhoods within those RSAs. Refer to the response to comment #1501 above for discussion of impacts on minority and low-income communities south of Truslow Avenue. As discussed in more detail in the response to comment #1501, block group 60590116022 would experience a DHAE from operational vibration (refer to Table 5-35 in the Draft EIR/EIS).

Furthermore, the commenter's reliance on *King & Gardiner Farms, LLC v. County of Kern* is misplaced. That case did not address disproportionate impacts on disadvantaged communities, nor does State CEQA Guidelines Section 15126.2(d) address environmental justice or impacts on disadvantaged communities.

Startle effects were analyzed for the entire project section as described in Section 6.5 of the *Los Angeles to Anaheim Project Section Noise and Vibration Technical Report*. At the maximum train speed of 90 miles per hour along the project section, startle effects from rapid onset rates would be limited to locations within 15 to 20 feet of the tracks. This distance falls within the railroad right-of-way, where there are no human noise-sensitive receivers such as residences. Therefore, increased annoyance from startle would not occur.

With respect to potential impacts related to nighttime construction activities, Impact N&V-1 in Section 3.4 of the Draft EIR/EIS discloses that nighttime noise impacts could temporarily occur at a total of 7,855 residences along the entire project corridor and that sensitive receivers within 600 feet of nighttime construction activities could be affected. As discussed in the Draft EIR/EIS, the Authority will incorporate NV-IAMF#1, Noise and Vibration, and implement N&V-MM#1 to address potential noise impacts during construction, including those during nighttime hours. Therefore, the Draft EIR/EIS adequately evaluates potential impacts from nighttime construction activities. As discussed in Section 5.6.3.3, although the majority of communities affected would be in low-income and minority communities, with implementation of N&V-MM#1, all construction-period effects would be reduced to

have no adverse effects related to noise in any community. Therefore, with N&V-MM#1, community concerns would be addressed, and there would not be a DHAE related to noise during construction.

The effectiveness of standard mitigation measures related to any future operational constraints at Fullerton Station is not an issue because no noise or vibration impacts from project operations requiring mitigation were identified. For construction, site-specific construction noise and vibration analysis will be carried out during project design when detailed information on construction methods and constraints is available and appropriate noise-monitoring program actions will be incorporated during construction as needed to account for operational constraints.

The commenter asserts that the analysis was incomplete and did not include the residential area south of Truslow Avenue. This area falls within the noise and vibration RSAs and, therefore, was included in the analysis. As listed in Table 3.4-16 and Table 3.4-18 of the Draft EIR/EIS, sensitive receptors in this area were considered between Harbor Boulevard and Fullerton Junction and between Fullerton Junction and Orangethorpe Avenue.

Mitigation measures tailored to the conditions of the project area are present by resource topic in Section 3.2 through 3.19. Cumulative impacts are evaluated in 3.19. Mitigation measures for any newly identified cumulative impacts are presented in 3.19.5, Mitigation Measures (for Any Newly Identified Significant Cumulative Impacts).

No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.35 1513

The comment generally asserts that multiple sensitive receptors, including schools, multifamily residences, and child-centered land uses, in the Fullerton RSA were not individually analyzed or identified in the impact tables. The comment does not, however, identify any specific receptor that was omitted from the analysis to allow the Authority to evaluate the factual accuracy of the statement. The noise and vibration analysis assessed potential noise and vibration impacts from project operations for all sensitive receptors in Fullerton within the RSAs defined in Table 3.4-4 of the Draft EIR/EIS. The assessments of operational noise and vibration impacts for specific locations are summarized in Tables 3.4-16 through 3.4-21 of the Draft EIR/EIS. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.36 1514

As discussed in Section 3.4.4, Methods for Evaluating Impacts, of the Draft EIR/EIS, the Authority used both current FRA and FTA methodology to assess the potential noise and vibration impacts and necessary mitigation measures for the HSR project. The methodology prescribed in these manuals includes detailed models to account for the propagation of noise and vibration from project sources to nearby sensitive receptors, rather than from one jurisdiction to another. Although the assessments identified severe noise and vibration impacts from project operations in Anaheim, these impacts are unrelated to sensitive receptors in Fullerton, where no such impacts were identified. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.37 1515

Because HSR operations would introduce a completely new source of ground-borne vibration to the existing railroad corridor along the project section, the predicted vibration levels from high-speed train operations were compared to the FRA criteria for a detailed vibration analysis to assess vibration impacts. These criteria, depicted on Figure 3.4-6 of the Draft EIR/EIS, are expressed in terms of one-third octave band vibration level thresholds. Although existing vibration (e.g., from freight and Metrolink operations) is not incorporated in these criteria, methods to account for existing vibration are included in Section 7.1.2 of the FRA *High-Speed Ground Transportation Noise and Vibration Impact Assessment* manual (FRA 2012), which was used in the Draft EIR/EIS. For a heavily used rail corridor, if the existing train vibration exceeds the impact criteria, the project will cause additional impacts if the project increases the number of trains by a factor of two or more. Otherwise, there will be additional impact only if the project vibration will be 3 vibration decibels more than the existing vibration. Because considering existing train vibration in this manner could preclude the vibration

assessment, the direct use of the detailed FRA vibration criteria represents a conservative approach for assessing ground-borne vibration impact along the project section. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.38 1516

Refer to Standard Response LAA-Response-Section 3.4 N&V-02: Sound Barriers and other Noise Abatement, in Chapter 18.

The comment claims that the Draft EIR/EIS does not evaluate the feasibility of mitigation in downtown Fullerton. However, as described below, because no operational noise or vibration impacts were identified in this area, no mitigation under N&V-MM#3 or N&V-MM#4 is required. Therefore, the specific issues raised (limited right-of-way for soundwalls; station-area utility conflicts; visual, seismic, and Americans with Disabilities Act constraints; inability to install tall barriers adjacent to switching plants; and operational restrictions preventing special trackwork installation in constrained areas) do not need to be considered and no mitigation in downtown Fullerton is being deferred.

As discussed in Section 3.4.4 of the Draft EIR/EIS, the Authority used both current FRA and FTA manuals to assess the potential noise and vibration impacts and necessary mitigation measures for the HSR project. In accordance with N&V-MM#3, sound barriers were evaluated in areas of severe noise impacts resulting from project operations, where the barriers meet the cost-effectiveness criteria consistent with the Authority's Noise and Vibration Mitigation Guidelines (refer to Draft EIR/EIS Appendix 3.4-A, Noise and Vibration Mitigation Guidelines). Based on this evaluation, one sound barrier in Anaheim was found to be feasible and reasonable. However, because no severe noise impacts from project operations were identified in Fullerton, noise mitigation measures were not evaluated in the city.

Because there are site-specific factors to consider for vibration mitigation, such as train speed, the presence of special trackwork, soil type, and vibration propagation characteristics, further studies during the subsequent engineering phases of the project should evaluate these site-specific conditions where vibration mitigation is indicated to determine the feasibility of implementing N&V-MM#4. Such studies would include additional vibration propagation tests to narrow down the site-specific vibration estimates and engineering evaluation of the special track support options. In any case, because no vibration impacts from project operations were identified in Fullerton, vibration mitigation measures would not be required in the city.

No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.39 1517

As stated in Section 3.2.6.3 of the Draft EIR/EIS, potential impacts related to disruption to freight and passenger rail system capacity during construction and operations would be avoided or reduced to less-than-significant levels with mitigation under CEQA. Furthermore, the addition of a fourth mainline track through the Fullerton Metrolink/Amtrak Station and a new center platform would improve operational efficiency within the station area. Refer to response to comment #1509 above for more information on how the project would improve operational efficiency. Therefore, the alternatives' constraints should not require extended idling and queuing of trains that could cause significant noise or vibration impacts. Consequently, the analysis of noise from slow-speed operations and idling was not required.

No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.40 1518

As discussed in Section 3.2, Impact TR-8, construction of HSR is anticipated to have minimal impacts on freight and passenger rail operations because service could be maintained with limited disruptions through the scheduling of specific work windows. Also, additional staging capacity for freight trains will be provided by the Caltrans High Desert Operational Efficiency Project, which is expected to complete construction in 2029 and is described in more detail in Draft EIR/EIS Section 2.6.1.5, Planned Freight Rail Improvements, and Section 3.2.6.2, No Project Alternative. It should be noted that Section 2.6.1.5 and Section 3.2.6.3 of the Draft EIR/EIS have been updated in the Final EIR/EIS

to update the year by which the High Desert Operational Efficiency Project is anticipated to be completed. Refer to Sections 16.4 and 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

To prevent construction from adversely affecting existing and planned freight and passenger rail service within the corridor or transit service at passenger rail stations, the Authority will incorporate TR-IAMF#11 and TR-IAMF#13 and implement TRAN-MM#6. Because HSR construction is anticipated to have minimal impacts on freight and passenger rail operations, bus bridging (i.e., emergency shuttle service implemented when commuter rail services are disrupted) would not be necessary. Although project-related construction staging and traffic would have temporary effects on bus transit, permanent effects are not anticipated. The analysis of temporary noise from rerouting traffic during construction, described in Section 3.4.6.3 of the Draft EIR/EIS, determined that traffic-generated noise impacts during project construction would be less than significant. Vibration modeling was not performed for bus operations, including bus layover zones or passenger pickup zones, because ground-borne vibration from buses is minimal and does not require modeling.

22.32.41 1519

This comment summarizes the concerns detailed in comments #1508 through #1518 above. The responses to those comments demonstrate that the Draft EIR/EIS adequately provides a factually supported and comprehensive assessment of noise and vibration impacts as required by CEQA, and therefore no revisions to the Draft EIR/EIS have been made and recirculation of the Section 3.4 is not warranted.

22.32.42 1520

Fullerton Municipal Code Chapter 15.53, Wireless Facilities in the Right-of-Way, regulates permitting for wireless telecommunication infrastructure, not electromagnetic field (EMF)/electromagnetic interference (EMI) impacts. Therefore, it is not directly relevant to Section 3.5, Electromagnetic Fields and Electromagnetic Interference, of the Draft EIR/EIS. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.43 1521

Section 3.5.1.3, EMI, discusses the definition of “sensitive equipment,” which can potentially be unshielded, and differentiates it from Federal Communications Commission– and FAA-regulated “radio communications” equipment. Potential impacts on Fullerton Municipal Airport are explicitly and separately analyzed in Section 3.5.6.3, Project Impacts, under Impact EMF/EMI-11. As stated under Impact EMF/EMI-11, during the planning and implementation stage, the Authority will design the HSR systems to prevent EMI with identified neighboring uses and monitor system performance to ensure ongoing compatibility (EMF/EMI-IAMF#2, Controlling Electromagnetic Fields/Electromagnetic Interference). These project features will avoid the potential for the project to interfere with airport systems. The residential distance of 250 feet is noted. The text in Section 3.5.5.1, Local Conditions, has been revised from 300 feet to 250 feet in the Final EIR/EIS. The closest dentist office to the 4201 Artesia Paralleling Station appears to be Gem Dental Laboratory, which is over 700 feet away, and therefore outside of the RSA. This dentist office has not been added into the Final EIR/EIS. DNB Engineering Laboratory at 1750 Raymer Avenue, Fullerton, CA 92833, is far from the Artesia Avenue paralleling station but adjacent to the HSR tracks. As an engineering testing laboratory, it could contain potentially sensitive equipment. Therefore, DNB Engineering Laboratory has been added into Section 3.5 as a sensitive receptor. Please refer to Section 16.5.5, Section 3.5: Electromagnetic Fields and Electromagnetic Interference, in Chapter 16 in the Final EIR/EIS for these revisions. This addition does not change the conclusions of the Draft EIR/EIS because the IAMFs and mitigation measures in the Draft EIR/EIS would apply to this site and reduce all impacts, similar to the other sensitive receptors analyzed in the Draft EIR/EIS.

22.32.44 1522

Cellular communications operate at much higher frequencies and would generally not be sensitive to the 60-hertz magnetic field from HSR. Furthermore, HSR communication devices will operate on dedicated frequency blocks and would be designed to meet Federal Communications Commission regulations. Therefore, per the methodology used to evaluate impacts in Section 3.5.4, Methods for

Evaluating Impacts, in the Draft EIR/EIS, telecommunications facilities are not considered EMI-sensitive uses and are not included in the analysis. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.45 1523

Utility stations such as the Southern California Edison (SCE) Fullerton Substation are identified in Section 3.5.5.1 as electrical power sources, not EMI receptors. The SCE Fullerton Substation was identified as an EMI source, not an EMI receptor. The field survey measurements at this location are documented in Appendix 3.5-A, Preconstruction Electromagnetic Measurement Survey. Substation equipment is designed with sufficient shielding to operate in the already high EMI environment within the substation itself. Therefore, per the methodology used to evaluate impacts in Section 3.5.4 in the Draft EIR/EIS, utility stations are not considered EMI-sensitive uses and are not included in the analysis. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.46 1524

Please refer to response to comment #1523 above regarding the SCE Fullerton Substation. Per the methodology used to evaluate impacts in Section 3.5.4 in the Draft EIR/EIS, utility stations are not considered EMI-sensitive uses and are not included in the analysis. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.47 1525

Impact EMF/EMI-6 in Section 3.5 discusses the potential for corrosion of underground pipelines, cables, and adjoining rail across the whole RSA, which includes Fullerton Municipal Airport. The impact under CEQA from corrosion of underground pipelines and cables caused by ground currents generated by project operation would be less than significant and the impacts under NEPA would not be adverse because interference with sensitive equipment in the form of corrosion of underground pipelines and cables would be minor. EMF/EMI-IAMF#2 requires grounding of nearby ungrounded linear metal structures or insulating metallic pipes to prevent current flow in accordance with measures called for in Chapter 23 of the Design Criteria Manual (Authority 2014). Therefore, project features will avoid or minimize the potential for corrosion from ground currents. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.48 1526

The comment asserts deficiencies in the Draft EIR/EIS's analysis of energy impacts. Energy impacts during construction and operation of the project are discussed in Section 3.6.6.3 of the Draft EIR/EIS.

Impact PU&E-9 analyzes energy consumption during construction. Table 3.6-27 presents the total construction energy consumption and the projected 2040 Annual Energy Savings for each of the Shared Passenger Track Alternatives, including the Norwalk/Santa Fe Springs and Fullerton HSR Station Options. As discussed under Impact PU&E-9, although measurable amounts of energy would be used for construction, the project would not require additional peak- or base-load capacity for electricity or other energy sources during the construction period because most construction equipment uses liquid fuel and does not require grid electricity to operate. PUE-IAMF#1, Design Measures, requires the incorporation of energy-saving measures and methods to minimize electricity consumption during construction, in a manner consistent with the Authority's Sustainability Policy (POLI-1007). The IAMFs and construction methods ensure that the project will not exceed or affect the energy resources that are otherwise available locally at the time of construction.

As explained in Draft EIR/EIS Section 3.6 and Table 3.6-2, the HSR system would draw electricity from the statewide grid during operation. Accordingly, impacts on electricity generation cannot be apportioned to any particular RSA or attributed to specific generation facilities, because the project would not rely on a dedicated or geographically isolated power source. Appendix 3.6-A, Water Use and Energy Analysis Technical Appendix, Attachment C includes project-level annual consumption data, which serve as the basis of the conclusions for Impact PU&E-9 and Impact PU&E-16.

The Draft EIR/EIS does not separately present peak- or base-period electrical demand (kilowatts) for the traction power substation facilities or LMF. As discussed in Impact PU&E-8, formal capacity

agreements between the Authority and local utility providers have not yet been executed, and current assumptions regarding capacity and site access will be refined as final engineering design and interconnection agreements are completed. Any new or upgraded electrical interconnections required to serve project facilities will independently require a permit to build or a certificate of public convenience and necessity from the California Public Utilities Commission under Public Utilities Code Sections 1001–1013 and General Order 131-E. Interconnection-specific peak and base capacity will be confirmed before those facilities are built.

The California Independent System Operator's 20-Year Transmission Outlook Update (2024) projects that an additional 165.1 gigawatts of new resources will be needed statewide to meet growing demand, including demand associated with the HSR system. As discussed in Impact PU&E-16, however, the project would result in energy savings, reduce regional demand for energy resources, and encourage the use of efficient transportation alternatives. Table 3.6-28 presents the estimated changes in energy consumption associated with the Shared Passenger Track Alternatives, including the Norwalk/Santa Fe Springs and Fullerton HSR Station Options.

Based on the foregoing, substantial evidence supports that the project would not result in a significant impact caused by wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Case law cited by the commenter held that an EIR's energy analysis was inadequate where it relied on generalized compliance with building or energy codes (e.g., Title 24) or on greenhouse gas mitigation measures as a substitute for a quantified, project-specific analysis of energy impacts. The Draft EIR/EIS does not rely on such substitutes. Rather, Appendix 3.6-A, Attachment C includes independent calculations of the project's construction and operational energy consumption, addressing both direct and indirect energy use, which serve as the basis for the impact analysis. This energy calculation was done in tandem with the air quality analysis because HSR and growing public transportation are anticipated to replace car trips.

No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.49 1527

The comment asserts that Section 3.6 of the Draft EIR/EIS should be revised and recirculated. Refer to response to comment #1526 above regarding assertions of the inadequacy of the Draft EIR/EIS's energy analysis.

As stated in Section 3.6.6.3 of the Draft EIR/EIS, the amount of energy consumed for construction of the project depends on the lengths of elevated, tunnel and trench, and at-grade guideway work. Table 3.6-27 presents the total construction energy consumption and projected 2040 Annual Energy Savings for each of the Shared Passenger Track Alternatives, inclusive of the Norwalk/Santa Fe Springs and Fullerton HSR Station Options. As presented in Table 3.6-27, Shared Passenger Track Alternative A would require 691,480 million British thermal units (MMBtu) and 980,607 MMBtu with the Fullerton HSR Station Option. In contrast, Shared Passenger Track Alternative B would require 1,006,271 MMBtu and 1,025,397 MMBtu with the Fullerton HSR Station Option. Similarly, operational energy demand is presented in Table 3.6-28. Increased energy consumption for the Shared Passenger Track Alternatives with the Fullerton HSR Station Option is estimated to be 215,659.36 MMBtu compared to the estimated energy demand of 211,679.31 MMBtu for the Shared Passenger Track Alternatives alone. The net change in energy use (i.e., after the energy savings from reductions in roadway vehicle miles traveled are factored in) would result in an energy savings of at least -9,660,265 MMBtu per year in 2040 for the Shared Passenger Track Alternatives alone, and -9,792,611.26 MMBtu for the Shared Passenger Track Alternatives with the Fullerton HSR Station Option. As stated in the Draft EIR/EIS, the project would have a beneficial impact on operational energy use. Based on this analysis, there is no evidence of any adverse impacts on the regional or local electricity system from project construction or operations. Given this, the commenter's request for enforceable energy mitigation is not relevant because mitigation is not required under CEQA. As discussed in Section 3.6.4.3, Methods for Impact Analysis, analysts estimated energy use based on the ridership estimates and train operating characteristics as presented in the Authority's 2023 Project Update Report. Energy rates were determined through the

use of carbon balance equations as recommended by the California Air Resources Board. Estimates are conservative and do not account for reduction in airplane travel in Southern California. Calculations assume that the amount of energy saved in the study years (2024 and 2040) would remain constant throughout the payback period. This approach is appropriate for a transportation project of this scale. Moreover, energy expended on construction for the project would be recovered in about 1 month based on anticipated 2040 ridership. Given this, the commenter's request for corridor-specific traction and station/LMF load modeling, hourly peak/base and coincident peak analysis, and sensitivity analyses for low ridership and extreme heat peaks has been met or is not necessary. Regarding the commenter's request for utility transmission and distribution interconnection capacity confirmations, the topic of utility service and interconnection is addressed throughout Section 3.6. Please reference the impact discussions for PU&E-1, PU&E-6, and PU&E-8. As discussed in Section 3.6.6.3, the project includes PUE-IAMF#1, PUE-IAMF#3, and PUE-IAMF#4, Utilities and Energy, as a part of the project to effectively minimize impacts. No mitigation is required under CEQA.

Given the response to comment #1526 above and the information provided, revision and recirculation of Section 3.6 is not warranted. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.50 1528

State CEQA Guidelines Section 15126.4(a)(1)(B) states that "specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency:(1) commits itself to the mitigation,(2) adopts specific performance standards the mitigation will achieve, and(3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure."

In the case of the project section and confirming water supply, the data available and best professional assumptions at the time of preparing the Draft EIR/EIS indicate that the demands of the project and associated facilities would not result in a significant demand of water or any adverse impact on local supplies. PUE-MM#1, Water Demand Analysis for Water Supplies for Construction and Operation, is designed to plan for and mitigate against any disruptions to water service either for the project or for the community adjacent to the project in perpetuity. The required analysis will ensure that results and findings are informed by more precise understanding of both project demands that consider advanced engineering and water supplies that are potentially available for the project.

As discussed under Impacts PU&E-3 and PU&E-11, and further described in Section 3.6.7, Mitigation Measures, the Authority would implement PUE-MM#1 to ensure that there are sufficient water supplies to support project construction and operation. Although available data suggest adequate supplies are available from existing water suppliers in the region to supply the quantity of water needed for construction and operation, given the rapidly and yearly changing climate conditions and unpredictability of water supply in Southern California, the Authority would implement PUE-MM#1, which requires the preparation and completion of an initial water supply analysis prior to the anticipated start of operations, and subsequent updated water supply analyses for the project every 5 years following the start of operations that identify the detailed water supply needs for operation of the LMF and stations. The water supply analyses will describe in detail the minimum adequate water supply for the RSA during normal, dry, and multiple dry years based on a more detailed project design and determine if the small fraction of water required to serve the project can be provided by existing water supplies. Although implementation of PUE-MM#1 would identify the detailed water supply needed for project operation in advance, it is possible that project operation could require new or expanded entitlements, or have to deal with shortages caused by local, rapidly changing conditions such as wildfires and drought. In that event, the Authority will, to the maximum extent feasible, have regular coordination with the water agencies to verify the sufficiency of water supplies and fund the expansion of water supplies and infrastructure necessary to reduce impacts related to operational water use at the LMF and stations. Implementation of PUE-MM#1 will increase coordination between the Authority and water suppliers and is intended to alleviate any potential strain on the local water supply as a result of increased local water demand from construction and operation. Consistent with

State CEQA Guidelines Section 15126.4(a)(1)(B), it would be the responsibility of the Authority to ensure that the construction and operational water demand required to serve the project stations would not cause impacts on water suppliers' existing service commitments.

Based on the foregoing, implementation of PUE-MM#1 is consistent with CEQA requirements and fully addresses the scope of project impacts. No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.51 1529

Contrary to the assertion in the comment, the hydrology and water quality impacts discussion in Section 3.8 is sufficiently detailed and adequately describes impacts in Fullerton as part of the alternatives. To evaluate potential project construction and operational effects, subject matter experts reviewed the preliminary engineering plans (15 percent design) for the Shared Passenger Track Alternatives and compared them with information on existing conditions to determine effects (refer to Section 3.8.4, Methods for Impact Analysis, of the Draft EIR/EIS). Specific drainage and water quality impacts within the RSA, which includes portions of Fullerton, are discussed throughout Section 3.8.6, Environmental Consequences, of the Draft EIR/EIS, specifically in Impacts HWR#1 through HWR#5, Impact HWR#9, and Impact HWR#10. "Finalized designs" of project features and final details for stormwater management and treatment plans (SWMTP) and other plans described in the IAMFs is not necessary for an adequate environmental impact analysis, as the comment suggests. Under NEPA, a project cannot be advanced to final design before environmental review has been completed and must rely upon conceptual design for EIS purposes.

The IAMFs are standardized features and commitments the Authority has incorporated into the project alternatives and construction to avoid or minimize environmental impacts up front (refer to Appendix 2-A). As discussed in Section 3.8.6 of the Draft EIR/EIS, the alternatives include four IAMFs to avoid and minimize impacts on hydrology and water resources. HYD-IAMF#1, Stormwater Management; through HYD-IAMF#4, Prepare and Implement an Industrial Stormwater Pollution Prevention Plan, for hydrology and water resources are not "future" vague commitments, but detailed project features that include specific performance standards and require regulatory compliance. The impact analysis in Draft EIR/EIS Section 3.8.6 explains how the IAMFs avoid or lessen impacts and the CEQA conclusion discusses the relation to the applicable CEQA significance threshold. The comment suggests the IAMFs are like improper deferred mitigation. The IAMFs are not mitigation measures, but even in that similar context, compliance with regulations is recognized as "common and reasonable" and not improper deferral (*Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884).

No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.52 1530

In Section 3.8, the Draft EIR/EIS identifies only one adverse effect before mitigation under NEPA and one less-than-significant impact post-mitigation under CEQA for Impact HWR-3 (temporary impacts on surface water quality during construction). For Impact HWR-3, the additional area of temporary disturbance with inclusion of the Fullerton HSR Station Option would be up to 10 more acres, but the types of temporary impacts would be similar in nature and no waterbodies would be crossed as part of construction of the HSR station option. All other impacts identified in Section 3.8 were either not adverse or less than significant before mitigation, even with inclusion of the Fullerton HSR Station Option.

As described in Section 3.8.6.3 of the Draft EIR/EIS, the increase of impervious surface cover and associated increase in stormwater runoff at the Fullerton Station Option will be managed through application of a SWPPP (HYD-IAMF#3). The SWPPP will include construction BMPs to manage the overall amount of stormwater runoff generated from the construction soil disturbance areas, including the Fullerton HSR Station Option. In addition, application of an SWMTP (HYD-IAMF#1) will reduce stormwater management effects, identify stormwater management BMPs designed to capture runoff, and provide treatment prior to discharge from pollutant-generating surfaces. Potential for permanent surface water hydrology impacts would be minimized or avoided. In addition, the Fullerton HSR

Station Option site is not within a floodplain. Characteristics of the Fullerton HSR Station Option are also provided in the PEPD Design Submittal DRAFT FINAL Stormwater Management Technical Report.

City of Fullerton policies, regulations, and permitting requirements were considered in the analysis, as summarized in Table 3.8-1. A city-specific hydrology and flood risk analysis is not required because impacts that would occur in Fullerton, including at the Fullerton Creek and Balcom Avenue Storm Drain water crossings, and floodplains in the city, as summarized in Tables 3.8-4 and 3.8-8, are included in the analysis throughout Section 3.8.6.3.

No revisions to the Draft EIR/EIS have been made in response to this comment.

22.32.53 1531

The commenter asks about a detention basin near Orangethorpe Avenue in Fullerton. Upon review, a detention basin at this location is no longer proposed. The Shared Passenger Track Alternatives would operate on existing tracks in this area. The project would only add OCS poles. As a result, the project would have minimal impacts on existing drainage patterns and flows in this area.

Table 3.8-10 has been revised to remove the Fullerton detention basin from the table and from the combined basin size, which now totals 45.65 acres. The text reference to the combined basin size has also been revised to remove the Fullerton detention basin in Section 3.8.6.3. Please refer to Section 16.5.8, Section 3.8: Hydrology and Water Resources, in Chapter 16 in the Final EIR/EIS for these revisions. As described in Draft EIR/EIS Section 3.8, Impact HWR-2, the SWMTP will evaluate the capacity of receiving stormwater drainage systems to determine the improvements required to maintain existing drainage capacity. The plan will specify BMPs, including retention or detention, or upgrades to the receiving drainage system, to manage potentially increased flow volumes and velocities resulting from new and reconstructed impervious surfaces. The project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in flooding or exceed the capacity of stormwater drainage systems, provide substantial additional sources of polluted runoff, or impede or redirect floodflows.

22.32.54 1532

Table 3.9-5 in Section 3.9.5.1, Geology, Soils, and Seismicity, of the Draft EIR/EIS summarizes existing potential soil hazards by city based on data from the U.S. Department of Agriculture Natural Resources Conservation Service. Table 3.9-5 identifies Fullerton as currently having a moderate to high potential for impacts on uncoated steel caused by corrosive soils. Pursuant to Section 3.9.6.3, Project Impacts, of the Draft EIR/EIS (specifically refer to Impact GSSPR-8), the Authority will incorporate GEO-IAMF#10 to address potential increases in the effects on people and structures related to corrosive and expansive soils. GEO-IAMF#10 requires the Authority-designated contractor to document via a technical memorandum how the project design and construction adheres to a series of state and federal regulations and codes. Implementation of standard engineering and design features (GEO-IAMF#10) would protect the integrity of the HSR track system and minimize potentially adverse effects that could result from corrosive soils. These features would consist of replacing the upper portions of soils that exhibit high corrosivity characteristics with soils that do not exhibit these characteristics, through the use of coated or corrosion-resistant steel or concrete materials. Potential effects from corrosive soils during operations are considered negligible after the above necessary IAMFs and protection systems are implemented during design and construction. Therefore, incorporation of GEO-IAMF#10 would prevent long-term adverse impacts related to soil corrosion during the design life of the project.

The Authority will coordinate with the City of Fullerton as the project design advances as part of defining long-term maintenance roles and responsibilities. However, because GEO-IAMF#10 prevents long-term adverse impacts related to soil corrosion during the design life of the project, there would be no long-term maintenance required for corrosive soil, and therefore no funding burden on the City of Fullerton for corrosive soils.

22.32.55 1533

As the reviewer noted, page 3.9-75 of the Draft EIR/EIS contains a discussion of erosion impacts resulting from construction activities including but not limited to dewatering. Construction of the Shared Passenger Track Alternatives may require dewatering for bridge column construction or construction of below-grade underpasses and the trench section near the Fullerton Municipal Airport. As discussed in Section 3.9.6.3, the amount of dewatering would likely be relatively small, if required, because of the depth of groundwater being generally below the depth of excavation and it would be conducted in widely spaced locations. Dewatering will be conducted in compliance with the State Water Resources Control Board Stormwater Construction General Permit.

Subsidence is discussed under Impact GSSPR-6 in Section 3.9 of the Draft EIR/EIS. Construction or modification of bridges, culverts, grade separations, and open trench sections, and construction near surface water features could require dewatering during construction. The amount of dewatering is likely to be relatively small and done in widely spaced locations. Effects from groundwater dewatering would be temporary because dewatering would cease once construction has been completed. GEO-IAMF#1 will reduce the effects of dewatering by controlling and minimizing groundwater withdrawal and requiring treatment before discharge. Therefore, the project would not increase the potential for subsidence. Consequently, it is unlikely that subsidence would occur at Fullerton Municipal Airport.

Refer to response to comment #1484 above. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.56 1534

The Fullerton Plan's Master Element C: The Fullerton Community has been added to Table 3.10-1. Please refer to Section 16.5.10, Section 3.10: Hazardous Materials and Wastes, in Chapter 16 of the Final EIR/EIS for this revision.

22.32.57 1535

Section 3.10 discusses a variety of hazardous materials and evaluates PEC sites using information from regulatory databases, past reports, and other information. The Fullerton Municipal Airport did not appear as a PEC site in research conducted for this project. In addition, most of the airport's support buildings are outside of the 150-foot buffer, which is the distance around the project area that involved a more in-depth analysis to identify potential PEC sites. However, there is still a possibility of undocumented contamination at properties not meeting the criteria of a PEC site (defined in Section 3.10). Many of the IAMFs included in this section, such as HMW-IAMF#4 and HMW-IAMF#10, Hazardous Materials Plans, are designed to minimize any impacts associated with hazardous materials that may be encountered during construction, including for construction activities close to the airport. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.58 1536

The commenter quotes text from Impact HMW-4 and highlights more extensive excavations and construction within the Orange County North Basin Superfund project area associated with the Fullerton HSR Station Option. HMW-IAMF#1 requires approvals by the appropriate environmental oversight agencies (related to project design) at sites subject to cleanup or land use controls. As stated in the IAMF, "Design and other corrective actions required to protect human health, and the environment will be coordinated with appropriate federal, state, and local agency officials and stakeholders (as necessary) and conducted in full compliance with recorded land use restrictions, applicable state and federal laws and regulations, and local ordinances." As such, any remediation activities or engineering controls would be implemented in full compliance with and full participation of applicable oversight agency or agencies. Proposed work associated with the Fullerton HSR Station Option in proximity to the existing Fullerton Metrolink station would minimize the overall ground disturbance, because the project proposes to rely on the existing facilities associated with the Fullerton Metrolink Station to the maximum extent feasible. As stated by the commenter, the project area with the HSR station option is slightly larger, and most ground disturbance would be associated with a proposed parking structure, which is sited farther from map ID 155 (Autonetics/Raytheon property at 311 S Highland; USEPA ID CAN000900354). Many of the IAMFs included in this section,

such as HMW-IAMF#4, are designed to minimize any impacts associated with the project, including for construction activities close to this referenced property.

Although the size of the project area and number of PEC sites slightly differ between the Shared Passenger Track Alternatives, as stated in Section 3.10 of the Draft EIR/EIS, the Fullerton HSR Station Option is currently an option. With or without the Fullerton HSR Station Option, the presence of the Orange County North Basin Superfund Site is the overarching reason why the conclusions are similar, regardless of whether the Fullerton HSR Station Option is implemented. The IAMFs and mitigation measure presented would collectively minimize impacts associated with the two additional PEC sites under the Fullerton HSR Station Option noted by the commenter and any undocumented contamination that may exist within or near the project footprint. HMW-MM#2, Coordination of High-Speed Rail Design and Construction with Remediation of Exide Site and Orange County North Basin Superfund Site, is required to be implemented as part of the Fullerton HSR Station Option under Impact HMW-4 in the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.59 1537

As discussed under Impact HMW-6, with incorporation of IAMFs and implementation of HMW-MM#1, the Shared Passenger Track Alternatives would not emit hazardous air emissions, handle extremely hazardous substances or mixtures containing extremely hazardous substances, or otherwise pose a health and safety risk to students or employees of schools within 0.25 mile. Proposed IAMFs, such as HMW-IAMF#4; HMW-IAMF#6, Spill Prevention; HMW-IAMF#7, Storage and Transport of Materials; HMW-IAMF#8, Permit Conditions, would minimize the impacts associated with Impact HMW-6 by protecting construction workers and the surrounding community, including any nearby schools, from health and safety risks associated with the Orange County North Basin Superfund site. These IAMFs include requirements for development and implementation of plans for managing contamination during construction, regulatory and permit conditions, spill prevention plans, and plans to prevent accidental release of hazardous materials during transport, use, storage, or disposal. Furthermore, implementation of HMW-MM#1 limits the use of extremely hazardous substances in quantities equal to or greater than the state threshold quantities specified pursuant to subdivision (j) of Section 25532 of the Health and Safety Code (as defined in 40 CFR Part 355.61) within 0.25 mile of a school.

In addition, the Impact HMW-6 discussion has been revised to include implementation of HMW-MM#2 for consistency with Impact HMW-4, which requires coordination of project design with responsible parties and the regulatory oversight agencies for construction activities occurring within the Orange County North Basin Superfund site footprint, and would address potential impacts associated with such activities within 0.25 mile of a school. No schools are presently within 0.25 mile of the Exide site. Given this, implementation of HMW-MM#2 under Impact HMW-6 would only apply to the Orange County North Basin Superfund site footprint. Please refer to Section 16.5.10 in Chapter 16 of the Final EIR/EIS to review these changes.

Per HMW-MM#2, the Authority will provide interested parties, including the City of Fullerton, regular updates on the status of the project section design as it relates to the Orange County North Basin Superfund site and provide opportunities for meaningful input on the advancing design at the 30, 60, and 90 percent design milestones.

22.32.60 1538

The discussion of Shared Passenger Track Alternative B and the Fullerton HSR Station Option under Impact HMW-6 has been revised to reflect increased demolition compared to Shared Passenger Track Alternative A. Refer to Final EIR/EIS Section 16.5.10 in Chapter 16. Although construction of Shared Passenger Track Alternative B and the Fullerton HSR Station Option platform, facilities, and parking would be in a larger area and would require demolition of several additional buildings, the types of potential impacts would be similar to those previously discussed under the Shared Passenger Track Alternatives analysis.

As noted in the revisions to Impact HMW-6 in Section 16.5.10, the Authority would incorporate the same IAMFs and implement the same mitigation measures for both Shared Passenger Track

Alternatives and HSR station options (HMW-IAMF#4 through HMW-IAMF#8, HMW-MM#1, and HMW-MM#2 added to Impact HMW-6). As stated in response to other comments (e.g., comment #1537 above), proposed IAMFs and mitigation measures would minimize the impacts associated with Impact HMW-6 to less-than-significant levels by protecting construction workers and the surrounding community, including any nearby schools, from health and safety risks. Given this, the impact conclusion for Shared Passenger Track Alternative B and the Fullerton HSR Station Option has not changed.

22.32.61 1539

As discussed under Impact HMW-8, the use of hazardous materials and generation of hazardous waste would be limited mostly to the maintenance and repair of trains and be intermittent in nature. Materials used in and wastes generated from O&M of the LMF, tracks, station, and railroad right-of-way include solvents, paints, and cleaners. Operating trains would generate brake dust. As noted in the Draft EIR/EIS, HYD-IAMF#1; HMW-IAMF#7; HMW-IAMF#9, Environmental Management System; and HMW-IAMF#10 are included in the project design to minimize operational impacts associated with hazardous materials. These include measures such as the preparation of and adherence to a hazardous materials monitoring plan and Environmental Management System, compliance with applicable state and federal regulations, and BMPs for treating stormwater runoff.

In regard to the commenter's concern about the baseline conditions used in the operational impact analysis, Section 3.10.6.3 of the Draft EIR/EIS compares the quantities of hazardous materials to the baseline condition. As stated on page 3.10-54, the use of hazardous materials and generation of hazardous waste during operation of the Shared Passenger Track Alternatives would be limited mainly to train maintenance and repair. The impact under CEQA would be less than significant because the limited potential for release of hazardous materials during the intermittent transport, use, storage, and disposal of such substances during operations would not result in a significant hazard to the public or the environment with implementation of the controls required in HMW-IAMF#7, HMW-IAMF#9, HMW-IAMF#10, and HYD-IAMF#1. The analysis previously included comparison of operations and construction to explain the differences in proposed activities. However, all impacts during construction and operation are compared against the existing condition to evaluate the impacts from the Shared Passenger Track Alternatives. As reflected in Final EIR/EIS Section 16.5.8, the discussion of Impact HMW-8 has been revised for greater clarity.

Continuous permanent impacts on freight and passenger rail during operations are discussed in under Impact TR-15 in Section 3.2 and in Section 3.19.4.1, Transportation, in Section 3.19.

22.32.62 1540

As stated in Impact HMW-10 and HMW-IAMF#1, contaminant investigations and design and implementation of required mitigation or remediation measures (Phase III ESAs) would occur during preconstruction activities. Phase I ESAs would be conducted within the timelines per ASTM's Phase I ESA standard and 40 CFR Part 312 prior to parcel acquisitions and also for properties with known or suspected contamination; therefore, new contamination (from existing contamination migrating or new releases) would be identified and addressed per HMW-IAMF#1. Site characterization conducted after Phase I ESAs would inform remediation required prior to construction (e.g., excavation, bioremediation, or other measures) or engineering controls, such as concrete caps, for preventing exposure to site contamination. Per HMW-IAMF#1, cleanup actions would be coordinated with regulatory agencies prior to project implementation. Preconstruction evaluation of properties, characterization of contamination, cleanup, implementation of engineering controls, and long-term site management plans developed with oversight from regulatory agencies would minimize long-term risks to the public during O&M of the project.

Preconstruction investigation, remedial treatment (e.g., excavation of contaminated media), or other corrective measures (e.g., vapor barriers and ventilation infrastructure) implemented during construction or as part of the design targeted at reducing risk associated with existing contamination would minimize risk associated with PEC sites prior to and during the operational period. Preconstruction site characterization would inform the selection of the appropriate building materials and engineering controls to be implemented during construction to isolate or remove hazards.

Clear protocols for managing residual contamination and for O&M of engineering controls would further reduce risks of operation of the HSR on PEC sites, including the Orange County North Basin Superfund site, over the life of the project. When hazards are mapped and recorded, appropriate procedures and management plans can be developed for routine maintenance, substantial renovations, and emergency response to protect human health and the environment. Please refer to Section 16.5.10 in Chapter 16 of the Final EIR/EIS for these revisions.

22.32.63 1541

The Authority acknowledges the City of Fullerton's request and will keep the City of Fullerton updated as an interested party related to HMW-MM#2.

22.32.64 1542

The analysis of Impact HMW-4 in the Draft EIR/EIS disclosed that implementation of HMW-MM#2 would also be required with inclusion of the Fullerton HSR Station Option because construction within the Orange County North Basin Superfund project area (Figure 3.10-3) would potentially cause a significant hazard associated with encountering hazardous wastes from the site (page 3.10-48). Given this, Table 3.10-7 has been revised to include Impact HMW-4 and HMW-MM#2 for the Fullerton Metrolink (i.e., Interlocker) Station early action project for consistency. Please refer to Section 16.5.10 in Chapter 16 in the Final EIR/EIS for these revisions.

22.32.65 1543

SS-IAMF#2 (Safety and Security Management Plan) requires the Authority-designated contractor to prepare a technical memorandum for the Authority documenting how the requirements, plan, programs, and guidelines listed therein were considered in design, construction, and eventual operation of the project section to protect the safety and security of construction workers and users of HSR. The contractor must provide the technical memorandum to the Authority no later than 60 days after receiving the Authority's notice to proceed on construction. Therefore, SS-IAMF#2 establishes when the IAMF will be incorporated, the party responsible for completing the requirements set forth by the IAMF, and the specific performance standards that must be achieved as part of the IAMF's incorporation. Refer to response to comment #1483 above. With respect to SS-IAMF#5, refer to response to comment #1484 above. Overall, SS-IAMF#2 and SS-IAMF#5 provide specific and enforceable requirements that have been considered as part of the Draft EIR/EIS analysis of potential impacts on aviation safety. As discussed in Section 3.11.6.3 of the Draft EIR/EIS, specifically under Impact SS-10, completion of the requirements set forth by SS-IAMF#2 and SS-IAMF#5 will minimize risks associated with the Fullerton Municipal Airport during project construction and operation through compliance with aviation safety regulations and any FAA conditions resulting from FAA review of the project section. No revisions have been made to the Draft EIR/EIS in response to this comment. Furthermore, the Authority is currently coordinating with FAA regional staff regarding the entire project section alignment, and is aware of and will be submitting FAA Form 7460-1 applications to FAA, which triggers the formal intradepartmental review and approval of the project, which includes the RPZ and airspace standards, among other FAA criteria. The findings from the FAA coordination will be incorporated into the future design packages as needed for both the permanent features and the temporary construction equipment.

22.32.66 1544

The Draft EIR/EIS does not defer analysis of measures to prevent impacts on pedestrian safety. Pursuant to Section 3.11 of the Draft EIR/EIS, the Authority will perform threat and vulnerability assessments to establish provisions for the deterrence and detection of criminal or terrorist acts involving HSR facilities and system operations, as required by SS-IAMF#3 (Hazard Analyses). SS-IAMF#3 requires that, prior to project construction, the Authority or its contractor will prepare a hazard assessment that includes a preliminary hazard analysis and threat and vulnerability assessment. The analyses will be prepared in accordance with the FRA's Collison Hazard Analysis Guide: Commuter and Intercity Passenger Service and the U.S. Department of Defense's System Safety Program Plan (MIL-STD-882). Compliance with these guidelines and standards will allow the Authority to identify potential facility hazards and vulnerabilities, which will then be addressed—and either eliminated or

minimized—by the project design. As demonstrated, SS-IAMF#3 provides a description of when the IAMF will be incorporated, the party responsible for completing the requirements set forth by the IAMF, and the specific performance standards that must be achieved as part of the IAMF's incorporation. Therefore, SS-IAMF#3 is adequate, as is the Draft EIR/EIS's consideration of SS-IAMF#3's ability to avoid or minimize impacts related to potential criminal or terrorist activities. The analyses under Impact SS-16 have been revised in the Final EIR/EIS to reflect that the threat and vulnerability assessment would be performed as part of SS-IAMF#3. Refer to Section 16.5.11, Section 3.11: Safety and Security, in Chapter 16 of the Final EIR/EIS for this revision.

Currently, the Authority does not have funding for construction of the project section. Therefore, planning efforts have not begun for this specific stage of the project. Future funding is being sought for continued progress. As funds become available, the Authority will proceed with advanced design and prepare for other preconstruction work, which will include preparation of the preliminary hazard analysis and threat and vulnerability assessment.

22.32.67 1545

The comment expresses concerns regarding the proposed modifications to the Fullerton Metrolink Station associated with (1) both Shared Passenger Track Alternatives and (2) the (optional) Fullerton HSR Station Option. The comment seeks additional information on station design, notes potential conflicts with an adopted planning document, and expresses concern about long-term effects on access and community vibrancy.

Draft EIR/EIS Figure 2-65 depicts proposed modifications to the Fullerton Metrolink Station. As described in Draft EIR/EIS Section 2.6.3.5, proposed modifications would include, but not be limited to, sidewalk improvements and crosswalks south of the new center platform.

Draft EIR/EIS Figure 2-80 depicts the more extensive modifications associated with the optional Fullerton HSR Station Option. As described in Draft EIR/EIS Section 2.6.6.2, High-Speed Rail Station Option: Fullerton, the HSR station option would add two new pedestrian bridges to connect existing Metrolink facilities with new HSR facilities.

With regard to the statement that the HSR project would conflict with the City of Fullerton's adopted "Fullerton Station Specific Plan," refer to Draft EIR/EIS Appendix 3.1-A (Regional and Local Policy Inventory and Consistency Analysis). Under "Station Planning, Land Use, and Development," this appendix presents evidence of the HSR project's consistency with both the 2004 Fullerton Transit Village Specific Plan as well as the 2015 Fullerton Transportation Center Specific Plan. (The City of Fullerton's website does not identify a document named the "Fullerton Station Specific Plan.")

The Authority acknowledges the historical and cultural identity associated with the Fullerton Metrolink Station. The Authority also acknowledges that the plans (for both the modifications to the Fullerton Metrolink Station as well as the optional Fullerton HSR Station Option) are relatively schematic. As a state agency, the Authority is not required to comply with local land use and zoning regulations; however, it has endeavored to design and build the HSR project so that it is compatible with land use and zoning regulations. As the level of design advances, it is the Authority's intent that any HSR-related changes are developed in a manner that is sensitive to and respectful of the surrounding context as feasible. To this end, the Authority would implement LU-IAMF#2 to better ensure that detailed design is as responsive to local agency concerns and context-sensitive as feasible. The Final EIR/EIS reflects a clarification to LU-IAMF#2 that ensures its coordination applies to both (1) proposed HSR stations and (2) existing passenger rail stations requiring modifications as a result of the project. Refer to Final EIR/EIS Section 16.5.13 in Chapter 16 for a description of the edits to LU-IAMF#2.

Regarding prospective cultural impacts, refer to Draft EIR/EIS Section 3.17.7.3, Project Impacts. In this section, Impact CUL-4 considers in detail the potential for impacts affecting the historic qualities of Fullerton's Union Pacific Railroad Depot. As detailed in Impact CUL-4, with incorporation of several IAMFs, the HSR project would not result in effects on the depot with the potential to diminish any character-defining features that express the property's significance and integrity.

Regarding the assertion that both the proposed modifications to the Fullerton Metrolink Station as well as the optional Fullerton HSR Station Option would "shift the center of activity and future transit-oriented investment toward the south side of the tracks" inconsistent with adopted land use plans, the Authority respectfully disagrees. The relatively minor station access modifications (Figure 2-65) included in the Shared Passenger Track Alternatives, such as sidewalk improvements along Walnut Avenue and replacement of the existing pedestrian bridge with a tunnel, would enhance user experience but are highly unlikely to "shift the center of activity" to the south side of the tracks. These relatively minor improvements south of the tracks would not discourage transit-oriented development or economic development activity north of the tracks.

Although the optional Fullerton HSR Station Option (Figure 2-80) would add a new HSR station along Walnut Avenue, it would also include two new pedestrian bridges to facilitate and enhance connections to the north side of the tracks and thus not interfere with envisioned development and activity on the north side of the tracks. For these and other reasons, Appendix 3.1-A did not identify any inconsistencies with any of Fullerton's relevant adopted land use plans, including The Fullerton Plan, the Fullerton Transportation Center Specific Plan, and the Fullerton Transit Village Specific Plan.

Based on the foregoing, the proposed improvements at the Fullerton Metrolink/Amtrak Station, with or without the optional Fullerton HSR Station Option, would not compromise pedestrian access, conflict with relevant plans, dilute economic development opportunities, or undermine the City of Fullerton's planning and community engagement efforts. As set forth in LU-IAMF#2, the Authority will coordinate with the City of Fullerton as project design advances.

22.32.68 1546

Refer to Standard Response LAA-Response-Chapter 2 Alt-02: Changes to Passenger Rail Station Facilities, in Chapter 18.

The comment requests further evaluation of how proposed station area improvements in Fullerton conform with adopted land use plans, makes assertions about the nature of station area plans, and requests further coordination on future planning efforts, including requests regarding the participation of Metrolink (Southern California Regional Rail Authority [SCRRA]).

Because this comment restates several points made in comment #1545 above, the commenter is invited to refer to the response to that comment on numerous points. With regard to the comment's assertions about the extent of proposed modifications to the Fullerton Metrolink Station and how these are distinct from the proposed improvements associated with the optional Fullerton HSR Station Option, refer to the responses to comments #1490 and #1545 above. As detailed in the response to comment #1545, the Authority respectfully disagrees with the assertion that the proposed modifications to the Fullerton Metrolink Station associated with the Shared Passenger Track Alternatives would result in a repositioning of primary station access to the south, in conflict with adopted land use plans. As stated in the response to comment #1545, as a state agency, the Authority is not required to conform with local land use plans or zoning, but the Authority has endeavored to design and build the HSR project so that it is compatible with land use and zoning regulations. The response to comment #1545 also states that Draft EIR/EIS Appendix 3.1-A did not identify any conflicts with key goals of the relevant adopted land use plans concerning the Fullerton Station area. Finally, as further stated in the response to comment #1545, the project includes LU-IAMF#2 to better ensure that detailed design is as responsive to local agency concerns and context-sensitive as feasible.

With regard to the request that "SCRRA formally confirm its role as lead agency," the Authority believes this request relates to any additional CEQA environmental review that may be required for station area improvements. First, consistent with LU-IAMF#2, the Authority would welcome involvement of both the City of Fullerton and SCRRA in future discussions of station area planning and design. Second, if supplemental environmental review under CEQA or NEPA is required for the proposed Fullerton Metrolink Station modifications that are part of both Shared Passenger Track Alternatives (Figure 2-65) or the optional HSR Fullerton Station Option (Figure 2-80 and notably not

included in the discussion of the Preferred Alternative in Chapter 8, Preferred Alternative), the Authority would be the CEQA lead agency; SCRRA would be a responsible agency.

With regard to the assertion that the City of Fullerton has not been engaged in early consultation, the Authority respectfully notes it has consulted extensively with City of Fullerton staff and elected officials since project inception in 2007. As noted in Draft EIR/EIS Appendix 9-A, the Authority conducted 24 meetings with Fullerton city staff or elected officials between May 2007 and October 2019, with an additional 4 meetings between July 2020 and November 2024. Moreover, the Authority conducted several design charettes and open houses in Fullerton, including two each in 2010 and 2011, one in 2015, and another in 2023. Appendix 9-A further notes Authority presence at Fullerton events over the last several years, including Railroad Days and farmer's markets. Once more, as set forth in LU-IAMF#2, the Authority intends to engage with the City of Fullerton in any station modifications or improvements that are incorporated in any alternative selected to move forward for further design and development.

22.32.69 1547

Refer to Standard Response LAA-Response-Chapter 2 Alt-02: Changes to Passenger Rail Station Facilities, in Chapter 18.

The comment expresses concerns about the prospective compatibility of station area improvements with a locally adopted land use plan (the SOCO Walk/Fullerton Transit Village Specific Plan [2004]).

This comment notes that while the intent of the SOCO Walk/Fullerton Transit Village Specific Plan was to develop a walkable, transit-oriented development south of the tracks, the area south of the tracks "was not originally envisioned as the station's primary point of access."

Refer to the responses to comments #1490 and #1545 above, which clarify the extent of proposed station modifications associated with the Shared Passenger Track Alternatives (including the Preferred Alternative; Draft EIR/EIS Figure 2-65) and those associated with the optional Fullerton HSR Station Option (Draft EIR/EIS Figure 2-80).

It is not clear if the subject of this comment is the set of improvements associated with the Shared Passenger Track Alternatives or the optional Fullerton HSR Station Option. Regardless, refer to Draft EIR/EIS Appendix 3.1-A, which includes a review of the proposed project relative to key goals of the SOCO Walk/Fullerton Transit Village Specific Plan. The project is consistent with the specific plan's goals to foster revitalization and create a desirable community. This appendix also considers the HSR project's consistency with the 2015 Fullerton Transportation Center Specific Plan, finding that the project would help create a mixed-use neighborhood that contributes to the local economy and a sustainable natural environment.

Moreover, as noted in the responses to comments #1545 and #1546 above, the Authority respectfully disagrees with the assertion that the proposed station area improvements would result in the Metrolink station's primary point of access moving to the south.

As set forth in LU-IAMF#2, the Authority will continue to coordinate with the City of Fullerton as the project design advances.

22.32.70 1548

Refer to Standard Response LAA-Response-Chapter 2 Alt-02: Changes to Passenger Rail Station Facilities, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

The comment restates anticipated acquisitions from the City of Fullerton as stated in Section 3.12, Socioeconomics and Communities, and Section 3.13 of the Draft EIR/EIS. The commenter also provides a list (Attachment B) summarizing the acquired parcels from Volume 3.1 of the Draft

EIR/EIS. Note that Volume 3.1 states the total square feet of acquisitions that are anticipated (approximately 13 acres), while Section 3.13, Impact LU-4 sums up the nontransportation land uses that would be converted to a transportation use (7.43 acres) as part of the station planning and land use analysis.

The commenter states that agency roles in the acquisition process are not clear. The Authority would lead the right-of-way acquisition process, but future ownership and O&M responsibilities would be determined in coordination with all relevant parties.

22.32.71 1549

As discussed under Impact TR-8 in Section 3.2.6.3 of the Draft EIR/EIS, the proposed Fullerton Metrolink/Amtrak Station modifications would require removal of approximately 27 parking spaces along the southern side of the project corridor, as well as a small number of on-street parking spaces. However, the Draft EIR/EIS concludes that the 1,321 parking spaces in the existing parking structure on the northern side of the corridor should be sufficient to accommodate passengers. The Draft EIR/EIS additionally notes that there are also multiple paid parking structures nearby in downtown Fullerton as well as free parking options.

Based on the foregoing, no Parking Operations Plan was prepared, because the change in parking is not expected to increase vehicle congestion or queuing around the station. As described under Impact LU-6 in Section 3.13.6.3, Project Impacts, through incorporation of LU-IAMF#2, station space for curbside operations such as taxis, private buses, and shared rides will be provided. Stations will be designed to include mobility features such as walking paths, bicycle lockers, and vehicle drop-off zones to improve access and reduce the potential for congestion or queuing.

Moreover, during construction, TR-IAMF#8, Construction During Special Events, would be implemented, which would maintain roadway capacity during special events. During operations, implementation of mitigation measures and project features would avoid or reduce potential impacts that would alter the capacity of these roads to support event peaks.

Additionally, Final EIR/EIS Section 16.5.13 in Chapter 16 includes a revision to the number of parking spaces associated with the Fullerton HSR Station Option's proposed parking structure. Draft EIR/EIS Section 3.13 had stated it would accommodate 1,114 parking spaces. Final EIR/EIS Section 16.5.13 in Chapter 16 reflects the corrected number of parking spaces (570). Notably, the Preferred Alternative (Draft EIR/EIS Chapter 8) does not include the Fullerton HSR Station Option.

22.32.72 1550

The commenter asserts that the Draft EIR/EIS is silent on many goals and policies set forth by the Fullerton Transportation Center Specific Plan, Fullerton Transit Village Specific Plan, Harbor Walk Specific Plan, and 600 West Commonwealth Specific Plan but does not provide examples of goals and policies from the foregoing documents that should have been included in Appendix 3.1-A of the Draft EIR/EIS. Appendix 3.1-A evaluates the Shared Passenger Track Alternatives' consistency with the applicable goals and policies of the Fullerton Transportation Center Specific Plan (Goal 2 and Goal 3), Fullerton Transit Village Specific Plan (Goal 2 and Goal 5), and Harbor Walk Specific Plan (Project Goal 1 and Project Goal 6). Additionally, Appendix 3.1-A includes analyses of the Shared Passenger Track Alternatives' consistency with general objectives of the Fullerton Transit Village Specific Plan, with respect to site planning, architectural character, and landscape architecture, and the 600 West Commonwealth Specific Plan, with respect to transit-oriented development near HSR station locations. Furthermore, Appendix 3.1-A evaluates the Shared Passenger Track Alternatives' consistency with multiple goals and several policies of The Fullerton Plan including, but not limited to, Policy 5.5, which pertains to support for projects, programs, policies, and regulations that advance the Fullerton Transportation Center. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.73 1551

Refer to responses to comments #1485 and #1543 above.

22.32.74 1552

Refer to Standard Response LAA-Response-Section 3.16 AVQ-01: Impacts on Visual Quality during Construction and Operation, in Chapter 18.

The Authority has revised Section 3.15.6.3, Project Impacts, in Section 3.15, Parks, Recreation, and Open Space, of the Draft EIR/EIS to include a permanent visual impacts discussion for Truslow Park on Walnut Avenue in Fullerton. Views of built elements of the project section from the park would be partially obstructed by existing fencing, landscaping, and buildings along E Walnut Avenue. Impacts of the project would be reduced through incorporation of AVQ-IAMF#1, Aesthetic Options; and AVQ-IAMF#2, Aesthetic Review Process, which would substantially avoid or minimize impacts on viewers, visual character, and visual quality. Please refer to Section 16.5.15, Section 3.15: Parks, Recreation, and Open Space, in Chapter 16 of the Final EIR/EIS for these changes.

22.32.75 1553

The Authority has revised Section 3.19 to include the Atlas Fullerton Project. Minor revisions to correct project names were also incorporated. Please refer to Section 16.5.19 in Chapter 16 of the Final EIR/EIS for these revisions. Inclusion of the Atlas Fullerton Project did not change the impact conclusions reported in the Draft EIR/EIS, and no further revisions are necessary.

22.32.76 1554

Refer to Standard Response LAA-Response-Chapter 5 COMMUNITY-01: Need for Analysis of Impacts on Minority and Low-Income Communities, in Chapter 18.

The comment appears to restate a request made in comments #1479 and #1495 above that the Draft EIR/EIS include a separate addendum of impacts in Fullerton. Refer to the responses to those comments.

Also refer to Draft EIR/EIS Chapter 5, which considers the potential for DHAE on minority and low-income communities. Chapter 5's analysis is at the census block group level. Moreover, impacts associated with the Fullerton HSR Station Option are separately itemized throughout all of the technical analyses of Chapter 5, as well as such analyses within Chapter 3.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.32.77 1555

Refer to the responses to comments #1501 and #1504 above for discussion of the evaluation of impacts to have a DHAE on minority and low-income communities in Draft EIR/EIS Chapter 5 and impacts on census block groups south of Truslow Avenue near Fullerton Station (the area referred to throughout this comment letter). Also refer to the responses to comments #1537, #1538, and #1540 above regarding hazardous materials issues, including revisions to Impact HMW-6 reflected in Final EIR/EIS Section 16.5.10 in Chapter 16.

As discussed in Draft EIR/EIS Section 5.7 and Table 5-35, DHAEs on low-income and minority communities related to operational vibration and hazardous wastes and materials would occur in Fullerton census block groups. DHAEs related to operational noise, operational vibration, hazardous wastes and materials, and business displacements would occur in multiple communities and cities, including the Hobart neighborhood in Vernon/Commerce, McCampbell in Pico Rivera, Anaheim, Buena Park, and Fullerton. No DHAEs related to cultural resources would occur. To help address DHAEs, the Authority would implement the community analysis–specific IAMFs described in Section 5.8, Community Analysis–Specific Measures to Minimize Harm.

22.32.78 1556

The comment is a broad assertion that many mitigation measures summarized in Chapter 5 and found throughout the EIR/EIS are inappropriately framed with language such as "would be coordinated" and "would be considered during final design." The comment suggests such mitigation measures lack performance standards or enforceable timing and should be revised. However, the comment does not identify which mitigation measures in Chapter 5 or in other EIR/EIS sections lack

sufficient detail. A general comment requires only a general response (State CEQA Guidelines Section 15088(c)).

The comment is correct that Chapter 5 includes summaries of mitigation measures. The full text of each proposed mitigation measure is found in corresponding sections of Draft EIR/EIS Chapter 3. The Authority respectfully disagrees that the Draft EIR/EIS mitigation measures are insufficiently detailed. Where specific details of particular mitigation measures cannot be developed during the environmental review, the measures include performance standards appropriate to the impact or resource area, along with anticipated timing relative to the project.

As part of the Authority's project approval process, if the Authority elects to approve one of the alternatives, the approval would be conditioned on adoption of all mitigation measures determined to be feasible. The Authority will compile all such mitigation measures in a mitigation monitoring and enforcement plan, prepared to meet both state and federal requirements. The mitigation monitoring and enforcement plan would be formally adopted as part of any Authority CEQA and NEPA approval for the project.

For each mitigation measure, the mitigation monitoring and enforcement plan will identify:

- Implementation Action/Text/Mechanism: Identifies the actions required to implement the measures, including any required agreements and conditions.
- Reporting Schedule: Identifies the stage of the project and the frequency that reporting is to occur, if reporting is required.
- Implementing Party/Reporting Party: Except as noted, identifies the entity that will be responsible for directly implementing the mitigation measures, monitoring, and reporting. Implementation can be the responsibility of the Authority or its contractor. Monitoring will generally be the responsibility of the contractor, with oversight provided by the Authority during construction. Long-term mitigation monitoring responsibilities will be the responsibility of the Authority.
- Roles and responsibilities of the Authority and its contractors, including resource monitors.

No revision to the Draft EIR/EIS is warranted by the comment.

22.32.79 1557

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18.

The comment groups several concerns related to prospective right-of-way acquisition in the vicinity of the existing Fullerton Metrolink Station. Regarding agency roles, including ownership and maintenance, refer to the response to comment #1548 above.

Regarding the request for maintaining the aesthetics of the historic Santa Fe Railway Passenger Depot (also known as the Fullerton Metrolink Station), refer to the response to comment #1545 above, which examines consistency with adopted land use plans and the potential for impacts on the station as a cultural/historic resource.

22.32.80 1558

The comment asks that the fugitive dust control plan specifically address impacts on both sensitive receptors and airports. The comment also asks that various entities be offered the opportunity to review the fugitive dust control plan for review and comment.

AQ-IAMF#1 requires the Authority-designated contractor to prepare a fugitive dust control plan for each distinct construction segment that describes how measures will be employed and carried out to successfully prevent potential dust impacts, including impacts on sensitive receptors. SCAQMD is the agency responsible for regulating stationary sources of air pollution for the Fullerton region of the project. As such, the Authority-designated contractors operating in Fullerton will be required to include compliance with SCAQMD's Rule 403, Fugitive Dust, within their dust control plans. Refer to Draft EIR/EIS Section 3.3.2.2, State, for a description of SCAQMD Rule 403. Adherence to the terms of

AQ-IAMF#1 and SCAQMD Rule 403 will ensure that the on-site fugitive dust does not affect the nearby airport and other sensitive land uses.

Moreover, as provided for in AQ-IAMF#1 (refer to Draft EIR/EIS Appendix 2-A), the Authority will provide a draft of the plan to any potentially affected public school district on their request for their review and comment. The Authority notes the request for additional public agencies to have the opportunity to review and comment on the fugitive dust control plan.

22.32.81 1559

The Authority will provide the aesthetic guidelines technical memorandum required by AVQ-IAMF#1 and BMP field manual required by BIO-IAMF#11 to the City of Fullerton. A draft technical memorandum documenting the Authority-designated contractor's compliance with the facility lighting requirements required by BIO-IAMF#12 will be provided by the Authority to Fullerton Municipal Airport.

22.32.82 1560

The City of Fullerton is a "concurring party" listed on the draft Memorandum of Agreement. Therefore, the Authority will coordinate with the City of Fullerton to provide a draft of the Plan for the Protection of Historic Built Resources and Repair of Inadvertent Damage required by CUL-IAMF#6, Preconstruction Conditions Assessment, Plan for Protection of Historic Built Resources, and Repair of Inadvertent Damage; and the Built Environment Monitoring Plan required by CUL-IAMF#7, Built Environment Monitoring Plan, for review and comment.

22.32.83 1561

The Authority will provide a draft of the EMF/EMI technical memorandum required by EMF/EMI-IAMF#2 to Fullerton Municipal Airport.

22.32.84 1562

The Authority will provide drafts of community liaison multilingual notices required by CA-IAMF#1, Authority Community Ombudsperson and Contractor's Community Liaison; and the community roundtable notices required by CA-IAMF#3, Community-Inclusive Development of Aesthetic Treatments and Community Cohesion Enhancements; and CA-IAMF#4, Business Relocation/ Displacement Assistance, to the City of Fullerton.

22.32.85 1563

The Authority will provide a draft of the Construction Management Plan required by GEO-IAMF#1 to the City of Fullerton and Fullerton Municipal Airport. The Authority will provide a draft of the technical memorandum required by GEO-IAMF#7 to the City of Fullerton.

22.32.86 1564

Refer to responses to comments #1486 and #1536 above.

22.32.87 1565

The Authority will provide a draft of the SWMTP required by HYD-IAMF#1 and the SWPPP required by HYD-IAMF#3 to the City of Fullerton for review and comment.

22.32.88 1566

The Authority will provide the City of Fullerton drafts of the memoranda referenced in LU-IAMF#1 and LU-IAMF#2 for review and comment. Per LU-IAMF#1 and LU-IAMF#2, the Authority will continue to coordinate with the City of Fullerton on station development as the project advances to final design.

22.32.89 1567

The Authority will provide the noise and vibration technical memorandum required by NV-IAMF#1 to the City of Fullerton for review and comment.

22.32.90 1568

The Authority will provide the public communication plan required by PUE-IAMF#3 and technical memorandum required by PUE-IAMF#4 to the City of Fullerton for review and comment.

22.32.91 1569

The Authority will provide drafts of the construction safety transportation management plan required by SS-IAMF#1, Construction Safety Transportation Management Plan; the safety and security management plan required by SS-IAMF#2; and the hazard assessment required by SS-IAMF#3 to the City of Fullerton. The Authority will notify the City of Fullerton of oil and gas wells within 200 feet of the project alignment in the Fullerton city limits requiring abandonment and relocation pursuant to SS-IAMF#4, Oil and Gas Wells.

22.32.92 1570

The Authority will provide copies of its correspondence with FAA completed pursuant to SS-IAMF#5 to the City of Fullerton and Fullerton Municipal Airport.

22.32.93 1571

The Authority will provide a draft of the Construction Management Plan required by SOCIO-IAMF#1, Construction Management Plan, to the City of Fullerton.

22.32.94 1572

The Authority will provide drafts of the before and after survey report required by TR-IAMF#1 and construction transportation plan required by TR-IAMF#2 to the City of Fullerton. The construction transportation plan will be prepared in accordance with the requirements set forth by TR-IAMF#2.

22.32.95 1573

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

The commenter incorrectly states that Artesia Avenue would be narrowed from two lanes in each direction to one lane in each direction to accommodate the braced trench. Artesia Avenue is a four-lane road west of Dale Street, but narrows to a two-lane road immediately east of Dale Street, which is where the braced trench begins. The modifications to Artesia Avenue would begin farther east near Pritchard Avenue, where the roadway would be realigned south to accommodate the trench, but one lane would be maintained in each direction. The overall width of the roadway would be reduced by approximately 1 foot, from 44 feet to 43 feet, which would not affect emergency responders' ability to use the roadway. Refer to sheet CV-T3281 in Volume 3.3 of the Draft EIR/EIS for cross sections of the proposed modifications to Artesia Avenue. The Authority will continue to coordinate with the city and Fullerton Municipal Airport as the project advances. Refer to response to comment #1484 above regarding FAA coordination.

22.32.96 1574

The use of "limit" in TR-IAMF#6, Restriction on Construction Hours, means that the Authority-designated contractor will reduce the number of construction material deliveries that are able to be made during the morning and afternoon hours identified in TR-IAMF#6, as well as the number of construction employees that are allowed to arrive or depart the site during the hours set forth therein.

22.32.97 1575

As set forth by TR-IAMF#8, mechanisms to prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events include the presence of police

officers directing traffic, special event parking, use of within-the-curb parking, or shoulder lanes for through traffic and traffic cones. Prior to construction, the Authority will coordinate with local agencies, including the City of Fullerton, to apprise them of how they may notify the Authority of events that could, in combination with HSR construction activities, reduce roadway capacity because of increased traffic.

Los Angeles to Anaheim - RECORD #013865 DETAIL

Status:	Action Pending
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Nancy Lee

Stakeholder Comments/Issues:

Dear High Speed Rail Authority, Thank you for the opportunity to comment on the high-speed rail project. The City of Norwalk's comment letter on the Draft EIR/EIS is attached. We look forward to continuing to work with you throughout this process. Thank you. Disclaimer The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

CITY OF NORWALK
A Connected Community

Jennifer Perez, Mayor
Margarita L. Rios, Vice Mayor
Tony Ayala, Councilmember
Rick Ramirez, Councilmember
Ana Valencia, Councilmember

Jesus M. Gomez, City Manager

February 3, 2026

Los Angeles to Anaheim DEIR/DEIS Comment,
California High Speed Rail Authority
355 S. Grand Avenue, Suite 2050
Los Angeles, CA 90071

Re: City of Norwalk DEIR/DEIS Comments/Concerns LA to Anaheim HSR

Comments sent by e-mail: **Los.Angeles Anaheim@hsr.ca.gov**

Dear High Speed Rail Authority:

Please find our comments regarding the DEIR/DEIS for the above project. As a responsible agency, the City of Norwalk shares several concerns about the project.

1145 The proposed project would, during construction, have potentially significant impacts on the city including traffic and circulation, wear and tear on our local streets, air quality including potential health risks from the construction, geology and soils, hydrology and water quality, land use and planning, noise and vibration, light and glare, and public services/public safety.

1146 Furthermore, with the proposed work for grade separation of the line and at grade crossings in neighboring cities, the construction impacts associated with detours and rerouting of traffic on the City of Norwalk need to be thoroughly analyzed and mitigated where possible. In addition, once the final alignment is constructed, the growth inducing impacts associated with the project need to be accounted for and mitigated to the extent possible.

1147 From an operational standpoint, although your preferred alternative does not include a Norwalk station, we are concerned both with the construction and permanent operational impacts to our Norwalk Transportation Station. These must be thoroughly analyzed in the DEIR/DEIS.

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Jennifer Perez, Mayor
Margarita L. Rios, Vice Mayor
Tony Ayala, Councilmember
Rick Ramirez, Councilmember
Ana Valencia, Councilmember

Jesus M. Gomez, City Manager

1147 As you are aware, the segment is adjacent or abutting the City of Norwalk. The City has some environmental justice concerns given that the elevated platform would potentially be visually blighting at 50' feet above grade (from base to top of catenary). In addition, to the visual impact, there are concerns with noise, dust, and vibration once the project is operational. Though mostly in the City of Santa Fe Springs, both our Zimmerman Park and residential neighborhoods to the southwest and south directly abut the current BNSF Freight Rail line. In addition to the park, the residential uses are also sensitive receptors which already bear the environmental impacts of the existing uses in the area.

Below are our specific comments:

1148 **Alternatives Analysis:**

- Provide a detailed analysis of project alternatives including the "No Project" alternative.
- The alternatives provided still rely on existing access points and provide no other viable option to better design access and staging to avoid queuing on to Norwalk Streets.

1149 **Community Benefits Agreement:**

- Based on the extent of potential impacts for the proposed project on the quality of life and livelihoods for residents, workers, and business owners within the City of Norwalk, the city requests a Community Benefits Agreement as a means to avoid, minimize, monitor and offset the substantial physical and environmental impacts to the residents. Said agreement should consider both construction and operational impacts to the local Norwalk intersections and streets and of the inducing impacts of the line. Said improvements would include but not be limited to full concrete intersections, signal timing/TDM, rubberized asphalt or other noise dampening features in the street design, and traffic enforcement/public safety. This would include soundwalls on the above ground alignment to mitigate noise. In addition, given the introduction of a new bridge over Imperial, elevated platform serving the project just east of the Norwalk Transportation Center, and Carmenita Road, a focus on the appearance of new structural elements including bridge superstructures, columns, walls, to name a few should be designed with a decorative motif or theme in mind to create visual interest and mitigate the "industrial utilitarian" views of these structures.

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1150 **Traffic and Circulation:**

- All modeling should factor in background projects recently approved in Norwalk and expected to have a build out by 2028 through 2035 - the Norwalk Transit Village and the Walk/Norwalk Entertainment District at the City Hall lawn among others.
- In addition, projects in adjoining cities should be analyzed in total and be modeled to identify any impacts.
- Generally, a minimum of three days of counts (consecutive Tuesday—Thursday- during school hours) are recommended for existing trip generation counts.
- Per City Guidelines, the Scope should reference the California Air Pollution Control Officers Association's *Handbook for Analyzing Greenhouse Gas* Admission *Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, Designed for Local Government, Communities, and Project Developers* Report, Chapters 3 - Transportation, October 2024, (CAPCOA Report) for mitigation measure options. (The guidelines say 2021 CAPCOA)
- The traffic study should analyze additional intersections in Norwalk including: Bloomfield Avenue/Imperial Highway, Imperial Highway/Norwalk Boulevard, Imperial Highway/Pioneer Boulevard, Imperial Highway/Studebaker Road, and Carmentia Road as many of these streets will be directly impacted by the project.
- Signal timing and phasing should be part of the analysis. When impacts are identified, this study should determine mitigation measures such as signal timing adjustments, intersections modifications and Transportation System Management.

1151 **Noise:**

- For noise, the main issues of concern will be potential impacts to residential receptors located southwest and south of the project site—particularly related to construction noise.
- Operational noise will also be a concern to sensitive receptors including residential uses, schools and parks, as well as on-site stationary source operational noise.
- From a land use perspective this is one of the some of the most impactful uses in terms of noise, traffic, light/glare and air quality.

1152 **Visual Impacts:**

- Given the above ground alignment in those areas closest to Norwalk city limits please provide key views at the following:
  - Imperial Highway/Bloomfield Avenue;

1152

- Imperial Highway and Shoemaker Avenue; Civic Center Drive;
- Norwalk Manor Residential Neighborhood;
- Neighborhood to the southwest including Miller Avenue, Hayden Avenue, and Foster Road and;
- Carmenita Road.

1154

Environmental Justice Concerns:

- Since the project will follow a heavily utilized utility corridors including heavy commercial rail and heavy commuter rail, the alignment should look at the cumulative impact of introducing yet more rail traffic to the subregion including noise, traffic, air quality, and visual light and glare.

1155

Utilities:

- Given the electrification of the system, please identify any/all substations, transformer, transmission/distribution lines needed to serve the project and it's impact on the existing grid serving the City.

I can be reached at 562 929-5745 or ahamilton@norwalkca.sov and look forward to hearing from you.

Thank you in advance for your consideration.

Sincerely,

Alex Hamilton
Interim Community Development Director

CC: Jesus M. Gomez, City Manager

22.33 Response to Submission 013865 (Nancy Lee, City of Norwalk, Feb 3, 2026)

22.33.1 1145

Refer to Standard Response LAA-Response-Section 3.3 AQ-01: Construction Emission Impacts, in Chapter 18, Standard Responses.

Refer to Standard Response LAA-Response-Section 3.3 AQ-02: Operational Emission Impacts, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.3 AQ-03: Localized Health Risk Assessment from Construction Emissions, in Chapter 18.

Sections 3.2, Transportation; 3.3, Air Quality and Global Climate Change; 3.4, Noise and Vibration; 3.8, Hydrology and Water Resources; 3.9, Geology, Soils, Seismicity, and Paleontological Resources; 3.13, Station Planning, Land Use, and Development; 3.11, Safety and Security; 3.15, Parks, Recreation, and Open Space; and 3.16, Aesthetics and Visual Quality, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) evaluate potential impacts related to traffic and circulation, air quality, geology and soils, hydrology and water quality, land use and planning, noise and vibration, light and glare, and public services/public safety.

Please refer to responses to comments #1146 through 1155 below for more detailed responses to the City of Norwalk's concerns.

22.33.2 1146

Section 3.2 of the Draft EIR/EIS analyzes temporary impacts during construction on access and circulation. Impact TR-1 describes these temporary impacts, and Table 3.2-20 lists potential detour routes for road closures. The California High-Speed Rail Authority (Authority) would incorporate several impact avoidance and minimization features (IAMF) to minimize effects during construction, including TR-IAMF#1, Protection of Public Roadways During Construction; TR-IAMF#2, Construction Transportation Plan; TR-IAMF#6, Restriction on Construction Hours; TR-IAMF#7, Construction Truck Routes; and TR-IAMF#8, Construction During Special Events. These IAMFs would preserve detour routes and require preparation of a detailed construction transportation plan, as well as limit the hours, routes, and parking areas for construction vehicles.

Regarding growth-inducing impacts, Section 3.18, Regional Growth, evaluates the project's potential to induce employment, population, and housing growth. As stated in Impact RG-2, construction of the project is expected to generate employment at approximately 0.07 percent higher than is projected for the No Project Alternative. Impact RG-3 describes how, during operations, the project would contribute a small increase to projected population growth within the resource study area, of approximately 0.08 percent more than the No Project Alternative. The Los Angeles to Anaheim Project Section (project section) is within a heavily urbanized and built-out area, and high growth rates and substantial unplanned population growth are unanticipated. Mitigation is not required.

22.33.3 1147

Refer to Standard Response LAA-Response-Chapter 5 COMMUNITY-01: Need for Analysis of Impacts on Minority and Low-Income Communities, in Chapter 18.

Block groups in Norwalk, south of Norwalk/Santa Fe Springs Station and the existing rail corridor, include block groups 60375523012, 60375523021, 60375523022, and 60375523023. These block groups correspond with Senate Bill 535 disadvantaged communities displayed on CalEnviroScreen 4.0.

Draft EIR/EIS Chapter 5, Community Analysis, analyzed impacts on these block groups. Impacts analyzed included continuous permanent impacts on roadway segments (Impact TR-12), temporary exposure of sensitive receivers to construction noise (Impact N&V-1), and effects on visual quality during operations (Impact AVQ-3). Chapter 5 summarizes and describes these impacts at the block group level. These block groups would not experience a disproportionately high or adverse project

effect related to these impacts. Refer to corresponding sections of Draft EIR/EIS Chapter 3, Affected Environment, Environmental Consequences, and Mitigation Measures, for further detail on specific impacts.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.33.4 1148

The Shared Passenger Track Alternatives and the No Project Alternative are analyzed in each section of Chapter 3.

The commenter states the alternatives rely on existing access points, with no options for access and staging to avoid queuing on city streets. It is not clear what the commenter is referring to in regard to access points. Temporary circulation impacts are evaluated in Section 3.2 of the Draft EIR/EIS, with potential roadway closures and detours included in Table 3.2-20. Although traffic delays would occur during construction of grade separations and other project elements, these would be temporary, and multiple IAMFs would be incorporated to avoid and minimize impacts. TR-IAMF#2 would require the contractor to prepare a detailed construction transportation plan for minimizing the impact of construction and construction traffic on adjoining and nearby roadways while maintaining traffic flow during peak travel periods. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.33.5 1149

The commenter requests the Authority provide a Community Benefits Agreement, which would include measures to improve city streets, install soundwalls, and provide an attractive design for the elevated platform. The Authority is committed to designing a project that minimizes impacts on surrounding communities while providing benefits, but as a policy does not provide betterments or Community Benefit Agreements that are unrelated to impacts caused by the project. Mitigation measures are proposed for potential impacts.

Regarding the request for roadway improvements, the commenter's suggestions are not related to potential transportation or safety impacts that would be caused by the project.

Regarding the request for soundwalls, as described in N&V-MM#3, Implement California High-Speed Rail Project Noise and Vibration Mitigation Guidelines, soundwalls were evaluated for areas of potential severe noise impact. These guidelines require consideration of all mitigation measures that are reasonable, physically feasible, practical, and cost-effective to reduce severe noise impacts. A sound barrier is proposed in one location where there would be severe noise impacts, and where it would be consistent with the Authority's Noise and Vibration Mitigation Guidelines. There are no projected severe or moderate noise impacts in Norwalk; therefore, sound barriers are not proposed.

Regarding the appearance of structural elements, the Authority would work with local jurisdictions on detailed aesthetic treatments in later phases of design. The Authority seeks to balance providing a consistent, project-wide aesthetic with the local context. As described in Section 3.16, the Authority will incorporate AVQ-IAMF#1, Aesthetic Options; and AVQ-IAMF#2, Aesthetic Review Process, which require the contractor to follow the Authority's aesthetic guidelines and aesthetic review process. The Authority will identify key nonstation structures recommended for aesthetic treatment, consult with local jurisdictions on how best to involve the community in the process, solicit input from local jurisdictions on their aesthetic preferences, and evaluate aesthetic preferences for potential cost, schedule, and operational impacts.

22.33.6 1150

As described in Section 3.2.4.3, Methods for Impact Analysis, the traffic modeling for the Horizon Year 2040 baseline scenario includes reasonably foreseeable transportation network modifications, including committed projects in the Southern California Association of Governments' 2020 Regional Transportation Plan/Sustainable Communities Strategy. The Authority has reviewed publicly available plans and projects in Norwalk as well as all corridor cities, and included roadway modifications that would be built by the project's opening year in the model. In response to the comment, the Authority reviewed the two specific projects that the commenter suggests as well as other recent projects in the

city. Norwalk Transit Village and The Walk do not include new lane configurations that would affect roadway capacity, and therefore were not included in the model. The Authority identified a project currently under construction, which widens Firestone Boulevard by one lane between Studebaker Road and Imperial Highway. The roadway segment was analyzed in the Draft EIR/EIS, and it operates below the volume-to-capacity ratio and level of service impact thresholds for both the existing and Horizon Year 2040 scenarios. With the wider roadway, the capacity would increase and operations would improve; the roadway segment would continue to not have an adverse impact in all scenarios. No changes have been made to the Draft EIR/EIS in regard to recent projects in Norwalk.

Section 3.2.4, Methods for Evaluating Impacts, explains that traffic counts were performed on typical weekdays, with most traffic counts taken during typical peak periods of 7 a.m. to 9 a.m. and 4 p.m. to 6 p.m., between September 2015 and November 2015 on typical weeks without holidays, and while schools were in session. This methodology is consistent with standard industry practice.

The commenter suggests the California Air Pollution Control Officers Association handbook as a reference for traffic mitigation measures. The handbook is focused on helping agencies improve vehicle miles traveled (VMT) reduction for their projects, and is not applicable to the project section. As a transit project, the project section would reduce VMT and would result in a less-than-significant impact under the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Section 15064.3. The Authority has identified traffic mitigation measures for impacts under the National Environmental Policy Act, which address adverse traffic delay effects.

The commenter provides a list of intersections that they wanted included in the traffic analysis. All of these intersections were included in the analysis. These include N3 (Pioneer Boulevard and Imperial Highway), N7 (Norwalk Boulevard and Imperial Highway), N15 (Bloomfield Avenue and Imperial Highway), and N49 (Imperial Highway and Studebaker Road). Carmenita Road was also analyzed from Imperial Highway to Rosecrans Avenue as part of segments N028 and N062. As a point of clarification, Section 3.2 of the Draft EIR/EIS focuses only on intersections and roadway segments that would be adversely affected by the project. Given the volume of traffic analysis data, the detailed information on all of the intersection and roadway segments is included in the *Los Angeles to Anaheim Project Section Transportation Technical Report*, available upon request (this is noted throughout Section 3.2.6, Environmental Consequences, for each of the impact discussions). Several of the intersections and roadway segments in Norwalk would not have adverse traffic effects, and therefore are not listed in Section 3.2.

22.33.7 1151

Construction noise impacts are evaluated in Section 3.4 of the Draft EIR/EIS. As described in Impact N&V-1, temporary noise impacts are expected to occur at noise-sensitive receivers within the distances from the construction activity presented in Table 3.4-13. In Norwalk, there would be residential receptors within the distances presented in Table 3.4-13, specifically southwest of the Norwalk/Santa Fe Springs Metrolink Station where the new elevated guideway would be built. In any given location along the high-speed rail (HSR) alignment, construction noise would be temporary and intermittent, and would cease once work is complete. To minimize impacts, the Authority would incorporate NV-IAMF#1, Noise and Vibration, which requires the contractor to document how federal guidelines for minimizing noise and vibration would be employed when construction is occurring near sensitive receivers. In addition, the Authority would implement N&V-MM#1, Construction Noise Mitigation Measures, which requires the contractor to provide noise control measures as necessary to meet the noise limits and to monitor construction noise to verify compliance with the limits.

Operational noise impacts are evaluated in Impact N&V-4. Table 3.4-16 and Table 3.4-17 present the potential impacts on residential and institutional receivers, respectively. No potential noise impacts from project operations were identified in Norwalk.

22.33.8 1152

The commenter requests additional visual simulations at several locations near the Norwalk city limits. As discussed in Section 3.16.4.3, Methods for Impact Analysis, the Authority's visual impact methodology is based on the federal guidelines provided in the Federal Highway Administration's

Guidelines for the Visual Impact Assessment of Highway Projects. This methodology relies on representative key viewpoints (KVP) selected within defined landscape units rather than providing simulations at every location where the project may be visible.

Within the identified Gateway Cities Landscape Unit, visual conditions near the Norwalk city limits are adequately represented by KVPs 11, 12, and 13, which collectively disclose the range of visual character, viewer sensitivity, and viewing conditions present at the locations identified by the commenter. As analyzed and visually depicted in Section 3.16.6.3, Project Impacts, these KVPs represent roadway-oriented views (KVP 11), transportation and rail-adjacent views (KVP 12), and recreational and residential views (KVP 13). The viewer groups, land uses, and key views at the locations identified by the commenter are adequately and directly represented by KVPs 11 through 13, because the above-ground alignment at these locations would be visually similar in character.

Accordingly, the selected KVPs and overall corridor visual analysis adequately disclose potential visual impacts near the Norwalk city limits.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.33.9 1154

Refer to Standard Response LAA-Response-Chapter 5 COMMUNITY-01: Need for Analysis of Impacts on Minority and Low-Income Communities, in Chapter 18.

Section 3.19, Cumulative Impacts, discusses the Shared Passenger Track Alternatives' contribution to any cumulative impact for each resource area discussed in Chapter 3, including but not limited to noise and vibration, traffic, air quality, and visual resources. Section 5.6.3.11, Cumulative Effects, in Chapter 5 provides additional information on the cumulative impacts that could affect low-income populations and minority populations. Disproportionately high and adverse effects on low-income and minority populations were determined to include business displacements, hazardous materials and waste, and operational air quality and noise and vibration effects. Section 5.6.3.11 has been revised to include additional clarification regarding the cumulative analysis conducted for the Draft EIR/EIS. Refer to Final EIR/EIS Section 16.7, Chapter 5: Community Analysis, in Chapter 16, Corrections and Additions to the Draft Report, for these revisions.

22.33.10 1155

As discussed in Draft EIR/EIS Section 3.6.5.1, Public Utilities and Service Systems, and Section 8.4.1.3, Traction Power Substation Site Descriptions, the project section would connect to substations owned and operated by the Cities of Los Angeles and Anaheim. The approximately 30-mile project section would require two traction power substation (TPSS) sites. The first TPSS would be in the city of Los Angeles south of Washington Boulevard and west of Soto Street, adjacent to the existing railroad viaduct. The second TPSS would be in Anaheim, near the intersection of Lewis Street and Cerritos Avenue, north of the HSR alignment. The utility provider for the Los Angeles TPSS site is the Los Angeles Department of Water and Power. Anaheim Public Utilities is the provider for the Anaheim TPSS site. The Anaheim substation connection would be adjacent to the HSR right-of-way and would be relatively straightforward. Each substation would require a 2-acre parcel and would have a 20-foot-wide access road or easement from the nearest street. Figures presenting these features are provided in the Preliminary Engineering for Project Definition (Volume 3.4 of the Draft EIR/EIS). Alternatively, the Los Angeles substation connection would require construction of approximately 1 mile of aboveground power line to connect to a nearby substation east of the Los Angeles River between De La Torre Way and Spence Street.

Potential impacts on public utilities and energy from construction and operation of the project alternatives and station options are analyzed in Draft EIR/EIS Section 3.6.6, Environmental Consequences, under Impacts PU&E-8, PU&E-9, and PU&E-16. No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013868 DETAIL

Status:	Action Pending
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Judith Trujillo

Stakeholder Comments/Issues:

Sent on behalf of Rose Casey, Executive Director of Planning Ms. DiCamillo, Attached please find a letter regarding the Los Angeles to Anaheim Section Draft Environmental Impact Report/Environmental Impact Statement. Should you have any questions, me at 714-560-5729 or rcasey@octa.net, or Dan Phu, Director of Transportation Planning and Analysis at 714-560-5907 or dphu@octa.net. Thank you, Judith M. Trujillo Executive Assistant Planning Phone: (714) 560-5656 Email: jtrujillo@octa.net 600 S Main St. | Orange, CA 92868 The information in this e-mail and any attachments are for the sole use of the intended recipient and may contain privileged and confidential information. If you are not the intended recipient, any use, disclosure, copying or distribution of this message or attachment is strictly prohibited. If you believe that you have received this e-mail in error, please contact the sender immediately and delete the e-mail and all of its attachments.

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

February 3, 2026

Ms. LaDonna DiCamillo
Southern California Regional Director
Attn: Los Angeles-Anaheim
California High Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Via email: Los.Angeles_Anaheim@hsr.ca.gov

Subject: **Los Angeles to Anaheim Section Draft Environmental Impact Report/Environmental Impact Statement**

Dear Ms. DiCamillo,

3639

Thank you for the opportunity to review the Los Angeles to Anaheim Project Section Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). Orange County Transportation Authority (OCTA) is an owner of the rail line in Orange County and a member of the Southern California Regional Rail Authority (SCRRA, also known as Metrolink) Joint Powers Authority. OCTA previously provided comments on the Administrative Draft EIR/EIS (Draft EIR/EIS), Preliminary Engineering for Project Definition, Supplemental Alternatives Analysis, the Revised Notice of Preparation, and the Notice of Intent for the Environmental Impact Report/Statement for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority (CHSRA) Project. (See Attachment A).

3640

Unfortunately, CHSRA has not addressed any of OCTA's prior concerns to date, and this letter reiterates those comments. OCTA appreciates the opportunity to review the Draft EIR/EIS. We have coordinated our review of the Draft EIR/EIS with local and regional agencies, including the Los Angeles County Metropolitan Transportation Authority, Metrolink, Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Corridor Agency, Sothern California Association of Governments, California Department of Transportation District 12, and the cities of Anaheim and Fullerton. Below is a summary of our comments, with additional detail provided in Attachment B.

3641

The Shared Passenger Track Alternative, as proposed, would not provide true high-speed rail service to Anaheim and would not align with the intent of CHSRA's enabling legislation. Relying on slower speeds and reduced service levels to address impacts undermines the purpose of a statewide high-speed rail system and is redundant with existing passenger rail service. Alternatives

3884

should not be dismissed at this stage based on cost or constructability without fully evaluating all reasonable options and their long-term impacts. It is also important to consider service enhancement opportunities in heavily urbanized areas, such as the segment from Los Angeles Union Station to Anaheim Regional Transportation Intermodal Center (ARTIC). These may include facilitating and supporting higher-frequency service for Metrolink and/or Amtrak (funded by the LOSSAN Rail Corridor Agency).

3642

- The project proposes the use of OCTA-owned rail right-of-way without clearly defined agreements and does not fully evaluate the long-term loss of flexibility resulting from permanent infrastructure (i.e., overhead catenary systems and storage tracks). Construction phasing for grade separations must ensure uninterrupted rail service and clearly address temporary access needs, including California Public Utilities Commission requirements, prior to project approval.

3643

- Station-related impacts at ARTIC, Buena Park, and Fullerton stations have not been fully addressed, including passenger circulation, platform access, Americans with Disabilities Act compliance, emergency access, parking loss, and construction impacts. The Draft EIR/EIS should also demonstrate coordination with City of Anaheim initiatives, such as the Building Bridges to Transit program. The analysis should demonstrate how station changes will maintain or improve passenger safety, accessibility, and convenience.

3644

- OCTA is a “responsible agency” under the California Environmental Quality Act (CEQA) and a “cooperating agency" under the National Environmental Act (NEPA) for the Project. Accordingly, OCTA must be designated as a responsible agency and cooperating agency under CEQA and NEPA, respectively.

3645

- The Draft EIR/EIS does not fully disclose the cumulative impacts of facilitating freight rail traffic through north Orange County communities, including interactions with port-related freight growth and potential shifts

3646

to truck traffic. In addition, the early action project list appears inconsistent with prior commitments, including the 2012 Memorandum of Understanding, and does not clearly address key grade separations such as Ball Road, Orangethorpe Avenue, and State College Boulevard. Greater clarity is needed regarding how these projects will be environmentally cleared and coordinated as part of the broader corridor strategy.

3647

- The Draft EIR/EIS does not sufficiently analyze how the proposed service would affect existing and future Metrolink and Amtrak services, as well as OCTA's planned investments, including the Southern California Optimized Rail Expansion Program and station improvements such as the Placentia Station. Key assumptions related to train frequencies, dispatching priority, and shared corridor capacity must be clearly explained and validated to ensure existing and future services are not negatively affected, particularly at Fullerton Junction.

3648

- City of Anaheim – State College Grade Separation: previous lead and current responsible lead.

    - OCTA initially led the project through approximately 2015 at the conceptual engineering phase. Following that period, the City of Anaheim (City) assumed responsibility for the preliminary design phase and advanced the project to approximately 30 percent design. During this phase, the City began rescoping the project to support a multi-staged construction approach intended to maintain traffic flow along State College Boulevard during construction.

    - Despite these efforts, the project was ultimately paused due to its high overall cost and the lack of identified funding. Given the magnitude of the project cost and the need to coordinate closely with CHSRA's Los Angeles Union Station to Anaheim section, it was determined that CHSRA would be best positioned to lead the project moving forward.

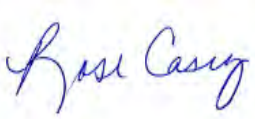
    - It is our understanding that CHSRA is expected to complete the environmental clearance and construction of this grade separation component as part of the Los Angeles Union to Anaheim section.

3649

- The Draft EIR/EIS does not fully assess how the proposed alignment and operational changes affect disadvantaged communities, including increased freight activity and cumulative health and environmental impacts. Additional Title VI and environmental justice analyses are needed to fully disclose potential impacts to disadvantaged communities. Similar to the air quality analysis performed for automobile and truck traffic, an air quality analysis of freight and passenger rail is warranted to determine appropriate mitigation for operational impacts.

OCTA appreciates the opportunity to provide meaningful input, and we look forward to working with CHSRA to address the comments above. OCTA also looks forward to continuing as an active participant in the development of the Los Angeles to Anaheim Project Section so that impacts to Orange County are adequately analyzed, addressed, and mitigated. If you have any questions or would like to discuss further, please contact me at 714-560-5729 or rcasey@octa.net, or Dan Phu, Director of Transportation Planning and Analysis at 714-560-5907 or dphu@octa.net.

Sincerely,



Rose Casey
Executive Director, Planning

RC:tc
Attachments

c: Dan Phu, OCTA

Attachment A

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

March 17, 2025

Attn: Mr. Simon Tse and Mr. Amit Joshi
Los Angeles-Anaheim
California High Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Via email: simon.tse@hsr.ca.gov and amit.joshi@hsr.ca.gov

Subject: Los Angeles to Anaheim Project Section Administrative Draft Environmental Impact Report/Environmental Impact Statement

Dear Mr. Tse and Mr. Joshi:

On February 3, 2025, the California High Speed Rail Authority (CHSRA) provided the Orange County Transportation Authority (OCTA) with the Administrative Draft Environment Impact Report/Statement (EIR/EIS) for the Los Angeles to Anaheim Project Section. OCTA plays an important role in Orange County as it relates to ownership of the railroad Right-of-Way (ROW) and funding of intercity passenger service. OCTA is a Joint Powers Authority member of the Southern California Regional Rail Authority operated by Metrolink. OCTA previously provided comments on the Supplemental Alternatives Analysis, the Revised Notice of Preparation, the Notice of Intent for the Environmental Impact Report/Statement (for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project, as well as the Preliminary Engineering for Project Definition documents (see attached September 24, 2020, January 22, 2024, and November 15, 2024 letters). In addition, OCTA has reviewed the Administrative Draft EIR/EIS; below is a synopsis of our review including recommendations pertaining to the approach of the Draft EIR/EIS (See Attachment A for more details).

- The roles and responsibilities of OCTA as a Responsible Agency as currently presented are vague and should be clearly defined.
- The roles, responsibilities, and relationships of Metrolink, Los Angeles – San Diego – San Luis Obispo (LOSSAN), Amtrak, Metro, BNSF Railway, and OCTA are also vague and not consistently described, particularly with the role of the LOSSAN not clearly defined.
- There should be discussion of the mechanism(s) that allow for high-speed rail operations on OCTA-owned ROW, future improvements or expansion

plans of the corridor, such as a licensing agreement, or another document both agencies deem appropriate.

- Previous comments and concerns expressed by OCTA and the City of Fullerton on the proposed Fullerton station option modifications and improvements and proposed use (i.e., how passenger access to Metrolink station amenities will be impacted based on proposed station reconfiguration) should be addressed prior to public circulation of the Draft EIR/EIS.
- There should be consistency in reference to station options description (e.g., Fullerton) between Alternatives A and B.
- There is inconsistency in describing what safety improvements will be incorporated into existing Anaheim crossings that will remain as part of the ultimate project. For example, Chapter 3 states that various safety enhancements will be included in the project and refers to Chapter 2 for details, which states grade crossings will not be modified.
- There is insufficient information pertaining to resolving and defining various Operations and Maintenance issues/responsibilities with existing rail operators and the potential impact to passenger rail operations and required collaboration. There appears to be more emphasis on freight rail and other transportation modes.
- While certain chapters identify Metrolink and LOSSAN growth plans, it is not clear if these plans have been incorporated into the 2040-year impact analysis.
- An Impact Avoidance Minimization Features review should be conducted to ensure each measure specifies which entity is responsible for the actions described therein.
- The potential impact of stationary sources affecting air quality should be revised to increase enforceability.
- Construction noise and vibration mitigation measures should be more specific to include criteria for monitoring locations and a range of options to achieve desired performance standards.
- Recommend that a specific menu of options be identified to achieve desired standards for the “Limit Use of Extremely Hazardous Materials near Schools during Construction” and “Remediation of Areas Associated with Superfund Sites or other Contaminated Properties Prior to Construction” sections.
- Confirm that existing and travel demand projections used to determine operational parameters within the existing public transportation framework have been reviewed to capture travel pattern changes resulting from the pandemic.

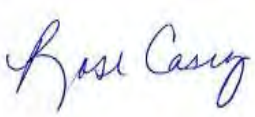
In addition to these comments, OCTA notes the need for further engagement on future subjects that may result in potential development of agreements and/or memorandums of understanding, as well as a potential amendment to the existing Shared Use Agreement. As the underlying track owner, it is imperative that OCTA fully captures how it would be impacted by the construction and launch of high-speed rail service and what mechanisms may be needed to memorialize roles and responsibilities as it relates to high-speed rail operations within its ROW. Subjects of interest include, but are not limited to:

- Roles and responsibilities of entities involved in high-speed rail operations (i.e. OCTA, CHSRA, potential operator and maintenance, etc.)
- Track ownership
- Modification to the existing Shared Use Agreement
- Electrification infrastructure
- Construction agreement(s)
- Operations and maintenance
- Utility relocation and costs

OCTA appreciates the opportunity to provide meaningful input, and we look forward to working with the CHSRA to address the aforementioned comments. Furthermore, OCTA looks forward to continuing to be an active participant in the development of the Los Angeles to Anaheim final EIR/EIS so that any impacts to Orange County will be adequately analyzed, addressed, and mitigated. If you have any questions or comments, please contact me at 714-560-5729 or rcasey@octa.net, or reach out to Dan Phu at 714-560-5907 or dphu@octa.net.

RC:rs

Sincerely,



Rose Casey, P.E.
Executive Director, Planning

CALIFORNIA HIGH-SPEED RAIL PROJECT

Los Angeles to Anaheim Project Section

RESPONSIBLE AGENCY COMMENT & RESPONSE LOG

Project: High-Speed Rail - Los Angeles to Anaheim (LA-A) Project Section			Updated	2/7/2025					
Agency: Orange Country Transportation Authority (OCTA)		Submittal: Administrative Draft EIR/EIS for Responsible Agency Review							
Comments					**Responses** Disposition Code: A = Have Incorporated / Will Incorporate; B = Have Clarified / Will Clarify; C = Delete Comment; D = Will Incorporate in Next Submittal; E = Discuss / Clarify with Authority				
Comment Number	Page/Sect Number	Comments	Reviewers Name	Date	Disposition	Response	Respond Initials	Date	Verification (QC name/date)
	Summary / Table S-1 p. S-13	Both alternatives A and B have same station configurations; “HSR station option to be in either Norwalk/Santa Fe Springs or Fullerton.” This is stated more clearly on page S-16. It is possible that neither High-Speed Rail (HSR) station is included in the project.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.1 p.2-2	*"The Authority continued to refine the design and coordinate with stakeholders and determined that, in order to maintain existing passenger rail and freight operations, additional BNSF Railway (BNSF) and intermodal facilities would be needed in Lenwood and Colton."* The discussion of efforts required to maintain existing passenger and freight rail operation does not mention the additional coordination and collaboration required with the Los Angeles-San Diego-San Luis Obispo Corridor Agency (LOSSAN), Southern California Regional Rail Authority (SCRRA) and their respective member agencies to assure that planned shared use track configurations avoid impacts to planned intercity and regional rail service expansion in the shared corridor.	R. Vandenberg	2/25/2025					

	Ch 2 / 2.4 p. 2-4	*"Operational planning would support and optimize coordinated HSR, freight, and conventional passenger service. Currently, the Metrolink Orange County and 91/Perris Valley Lines, National Railroad Passenger Corporation (Amtrak) Pacific Surfliner, and Burlington Northern Santa Fe Railway (BNSF), and Union Pacific Railroad (UPRR) freight trains operate within the LOSSAN Corridor. Because the proposed Shared Passenger Track Alternatives are within the active LOSSAN passenger and freight rail corridor, existing operators may have to change their operational patterns. New and re-aligned tracks would change the tracks on which the various users operate. Rail operators (HSR, Metrolink, Amtrak, BNSF, and UPRR) would coordinate train schedules and storage and maintenance needs to ensure efficiency and safety of the shared use of the corridor."* Pacific Surfliner is a State-sponsored route operated by Amtrak under contract to LOSSAN Rail Corridor Agency. Amtrak also operates the Southwest Chief route on the LOSSAN corridor between Los Angeles Union Station (LAUS) and Fullerton as part of its national network. The document does not describe/proscribe how this operational planning would happen or if required as part of the Environmental Impact Statement/Environmental Impact Report (EIS/EIR) adoption.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.4.2 p. 2-6 & 2-7	The document does not identify the regulatory approvals that will allow HSR trainsets to operate on shared track without temporal separation from rolling stock that is required to comply with 49 Code of Federal Regulations (CFR) 238. Reference or elaborate on discussion of Federal Railroad Administration (FRA) safety standards included in Chapter 3, section 3.11.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.4.4.1 p.2-11	Where operating within shared tracks, confirm that HSR profile is above 200-year floodplain within the Los Angeles-Anaheim limits (all urbanized), or measures taken to protect Right-of-Way (ROW) where it profile is within 200-year floodplain.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.4.6.2 p. 2-20	End of section describes Shared Passenger Track Alternatives to include parallelling station at Fullerton. Please clarify how what is elsewhere described as an optional station is covered the EIS/EIR if the Preferred Alternative is adopted.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.4.7 p. 2-21 & p-22	The document does not describe the means to assure the integration of Positive Train Control (PTC) with existing rail operators. Perhaps further description of the existing Metrolink PTC system is warranted.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.4.9.1 p. 2-22	The document acknowledges that a Memorandum of Understanding(s) (MOU) with other rail operators will detail the maintenance activities and responsibilities of the California High Speed Rail Authority (CHSRA) and other rail operators within the corridor. How is this memorialized in the EIS/EIR requirements? This will need to include requirements for movement of HSR maintenance equipment and materials from its planned Maintenance of Infrastructure Facility (MOIF) in Bakersfield.	R. Vandenberg	2/25/2025					

	Ch 2 / 2.6.1.4 p. 2-52 thru 2-54	This section acknowledges the plans by LOSSAN and Metrolink to increase train service within the project corridor, among a full range of fixed guideway rail and transit improvements across Southern California and the Southwest. Because of the unique importance of the future planned regional and intercity rail service with which the HSR trains will share operating tracks, a table describing current and proposed passenger rail frequencies (Metrolink, Pacific Surfliner, Southwest Chief) between the Los Angeles-Fullerton and Fullerton-Anaheim segments would provide greater clarity of the operational context within which the HSR trains would operate. This will need to include current/planned Metrolink Orange County Line and 91/Perris Valley Line trains that operate through the Fullerton Junction.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.1.5 p. 2-55	In describing the Southern California Association of Governments (SCAG) rail strategy as part of planned freight rail improvements, the document should acknowledge that the BNSF-owned portion of the Los Angeles-Anaheim alignment between Redondo Junction (Alameda Corridor) and Fullerton Junction is a critical component of the intermodal rail connection between the Port of Los Angeles (POLA) and Port of Long Beach (POLB) and the rest of the country.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.2.1 p. 2-59	Freight or Passenger Railroad Modifications - Because of its critical importance in rail capacity, the modifications to the Fullerton Junction should be identified in the narrative. Table 2-10 should also clarify that rail yards to be modified are freight rail yards.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.2.1 p. 2-60	Roadway Modifications - the alternatives are described to "maintain 8 existing at-grade crossings." What crossing improvements are proposed as part of the project?	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.1 p. 2-87	Fullerton alignment - This section describes that under Shared Passenger Track Alternative A, HSR trains would not stop at Fullerton (implying that a HSR station at Fullerton is part of Alternative B); however, other sections of the documents state that the Fullerton station is included only as an option under each of the shared track alternatives. Please clarify.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.1 p. 2-87	Fullerton alignment - the document acknowledges that Fullerton Junction is a critical node in the Southern California rail network.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.2 p. 2-94	Signaling and Train-Control Elements - this section should acknowledge the coordination and interface (including dispatch) with shared rail operations.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.3 p. 2-105	Fullerton Metrolink/Amtrak Station Modifications - This section describes that under Shared Passenger Track Alternative A, HSR trains would not stop at Fullerton (implying that a HSR station at Fullerton is part of Alternative B); however, other sections of the documents state that the Fullerton station is included only as an option under each of the shared track alternatives. Please clarify.	R. Vandenberg	2/25/2025					

	Ch 2 / 2.6.3.3 p. 2-105	Fullerton Metrolink/Amtrak Station Modifications - the second paragraph describes passenger services at this station. The Pacific Surfliner service would more accurately be described as LOSSAN Pacific Surfliner or Amtrak California Pacific Surfliner.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.3 p. 2-113	HSR Station Option: Fullerton - The opening paragraph requires clarification about what improvements are included in Alternative A and Alternative B, with and without the Fullerton Station option.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.6 Table 2-14 p. 2-135	Modifications to Roadway Crossings - validate that no modifications are required at the Anaheim grade crossings that will remain including Orangethorpe Avenue, La Palma Avenue, Sycamore Street, Broadway, Santa Ana Street, South Street, Vermont Avenue, and Ball Road with proposed train operating speeds and frequencies. Chapter 3.11 section 3.11.5.2 identifies that the 5 railroad operational incidents on the LOSSAN Corridor in Orange County occurred in Anaheim, including one at South Street and one at Orangethorpe Avenue.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.6 p. 2-142	State College Boulevard Grade Separation - validate that project footprint is consistent with plans developed by City of Anaheim in consultation with project stakeholders.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.5.2 p. 2-158	Metrolink Station Relocations - OCTA bus service should be mentioned for coordination regarding bus routes and service to the new Buena Park station. How is the specific action for transit coordination memorialized in the EIR/EIS requirements?	R. Vandenberg	2/25/2025					
	Ch 2 / 2.8.2 p. 2-164	Other Rail Services in the Shared Corridor - this section should acknowledge the difference between national Amtrak service and State-supported Amtrak service, which require coordination with different stakeholders.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.8.2 p. 2-164	Other Rail Services in the Shared Corridor - in this section, the document identifies train volumes established in 1992 shared use agreement, but does not acknowledge the proposed service frequencies for Metrolink and Pacific Surfliner services that were described in section 2.6.1.4. The requirement for further coordination with existing rail operators should be identified here.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.8.3 p. 2-164	Maintenance Activities - As in section 2.4.9.1, this section should Acknowledges that MOU(s) with other rail operators will be required to define maintenance responsibilities of CHSRA and other rail operators within the corridor. How is this memorialized in the EIS/EIR requirements?	R. Vandenberg	2/25/2025					
	Ch 3 / 3.1.5.6 p. 3.1-14	Operational Impacts - this introductory section does not specifically mention the potential for HSR impacts on existing rail service that are a key consideration in the shared corridor/shared track alternatives.	R. Vandenberg	2/25/2025					
	Ch 3 / 3.2.4.5 p. 3.2-41	Significance of impacts to Transit - consistent with definition of transit to include passenger rail operations, this should add passenger rail operations to this description (similar to Freight Rail Service in section below).	R. Vandenberg	2/25/2025					

	Ch 3 / 3.2.5.6 p. 3.2-50	Passenger Rail Service - this section does not identify other owners of the railroad ROW (BNSF and OCTA) and also the role of LOSSAN (Pacific Surfliner) as compared to Amtrak (Southwest Chief)	R. Vandenberg	2/25/2025					
	Ch 3 / 3.2.5.7 p. 3.2.51 & 52	Freight Rail Service - The discussion of existing passenger rail seems to belong in section above. Or perhaps the discussions should be segregated by ownership since passenger and freight rail operate in a shared environment within the project limits. OCTA ownership of the LOSSAN corridor between Fullerton and Anaheim is not acknowledged. The title of Table 3.2-13 seems incorrect.	R. Vandenberg	2/25/2025					
	Ch 3 / 3.2.6.2 p. 3.2-66 & 67	The initial focus on LAUS (not part of this Draft EIR/EIS) and emphasis of Metro Rail services and portal access over Metrolink and Amtrak services is somewhat confusing.	R. Vandenberg	2/25/2025					
	Ch 3.1 / 3.1.7 p. 3.1-17	Legal Authority to Implement Off-Site Mitigation - this is the introductory section that identifies ownership of the corridor (Los Angeles Metropolitan Transportation Authority (LACMTA), BNSF, and OCTA) and acknowledges that this ownership will not change. Is clarification needed to memorialize the EIS/EIR requirement to enter into necessary agreements to allow for construction and operation of the project?	R. Vandenberg	2/25/2025					
	Ch 3.11	Does not reference existing safety and security plans of rail operators and ROW owners within shared corridor and how HSR will coordinate with those plans.	R. Vandenberg	2/25/2025					
	Ch 3.11	Mitigation measures regarding rail operations and station operations are focused on mitigating construction-related and emergency response access on public roadways rather than railroad operations-related security and safety impacts.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.1 p. 3.11-1	Intro to analysis of safety impacts describes analysis of construction and operational changes on safety of automobile, pedestrian, and bicycle traffic but does not mention safety of existing passenger and freight rail operations.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.2.1 p. 3.11-4	Discussion of FRA safety standards includes reference to Caltrain emergency preparedness plan, which appears to be remnant of another environmental document.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.2.2 p. 3.11-11	Technical Memorandum 2.8.1 is referenced for provisions to ensure safety and security related to access control adjacent railroad, and intrusion protection. This memorandum was not part of the review materials.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.5.2 p. 3.11-60	Railroad Operations - would be useful to reference this more comprehensive discussion of railroad operations in other related sections. Amtrak operation of Southwest Chief should also be added here.	R. Vandenberg	2/25/2025					

	Ch 3.11 / 3.11.5.2 p. 3.11-60 & 61	Railroad Operation - A table describing current and proposed passenger rail frequencies (Metrolink, Pacific Surfliner, Southwest Chief) and freight train forecasts between Los Angeles-Fullerton and Fullerton-Anaheim would provide greater clarity of the operational context within which the HSR trains would operate. This will need to include current/planned Metrolink Orange County Line and 91/Perris Valley Line trains that operate through Fullerton Junction.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.6.3 p. 3.11-96	Impact SS-13 / Collisions between HSR train and objects entering rail corridor - how will proposed intrusion detection systems and barriers be implemented in this shared corridor?	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.6.3 p. 3.11-96	Impact SS-13 / Train Derailment - please clarify how safety considerations related impacts of potential derailment have been incorporated into project design.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.6.3 p. 3.11-97	Impact SS-13 / At-Grade Train Collisions - this section describes incidents that have occurred at existing at-grade crossings in Anaheim that are to remain (Orangethorpe, La Palma, South Street, Sycamore). The narrative refers to safety improvements such as quad gates, median barriers and pedestrian safety features that will be implemented as part of the project, with reference to Chapter 2; however Chapter 2 states that no modifications are planned at the existing at-grade crossings to remain.	R. Vandenberg	2/25/2025					
	Ch 3.13 / 3.13.5.2 p. 3.13-44	Zoning and Planned Uses, Anaheim - the document notes the plans for OC VIBE, but does not acknowledge that this plan also includes the ARTIC station site and may affect proposed HSR station area investments.	R. Vandenberg	2/25/2025					
	Ch 3.19	Consideration of cumulative operational impacts for Transportation does not address/discuss potential impacts to existing passenger rail operations and coordination/analysis/agreements that would mitigate those impacts.	R. Vandenberg	2/25/2025					
	Ch 3.19 / 3.19.3.5 Table 3.19-3 p. 3.19-18	This table includes physical improvements but does not include important passenger rail operational expansion (Metrolink, LOSSAN) that are reasonably expected to occur prior to 2040.	R. Vandenberg	2/25/2025					
	Ch 3.8	This section identifies and evaluates hazards related to flooding within 100-year floodplain (1% chance); however, Chapter 2 section 2.4.4.1 states that HSR profile within urbanized areas will be established above 200-year floodplain.	R. Vandenberg	2/25/2025					
	Ch 7	There are no mitigation measures that memorialize the need for critical MOUs and additional engagement with existing rail operators to validate schedules and operational and maintenance requirements and responsibilities.	R. Vandenberg	2/25/2025					

	Ch 7 / 7.1.1 p.7-3	Station Planning, Land Use, and Development - LU-MM#1 general guidelines are intended to minimize potential to cause substantial change in land use patterns. Validate that plans for ARTIC are consistent with adopted development plans (e.g. OC VIBE, OC River Walk).	R. Vandenberg	2/25/2025					
	Ch 8 / 8.1 p. 8-1	List of users should identify that users include both national Amtrak long-distance service and State-supported Pacific Surfliner intercity rail service, for which Amtrak is the contracted operator.	R. Vandenberg	2/25/2025					
	Ch 8 / 8.2.6 p. 8-9	OCTA has not been included in list of regional and other public agencies with an important interest in the Project.	R. Vandenberg	2/25/2025					
	Ch 8 / 8.4.1.1 p. 8-29	In executive summary, both Norwalk/Santa Fe Springs and Fullerton are identified as optional stations. Here the Preferred Alternative is defined as excluding those two stations. Is the Fullerton HSR alternative being included here for environmental clearance? Or would a supplemental EIR/EIS be required should that optional station be implemented?	R. Vandenberg	2/25/2025					
	Ch 8 / 8.2 Table 8-1 p. 8-5	Common Comments Considered - this table acknowledges the concerns that have been voiced about Metrolink's planned service expansion and HSR compatibility with Amtrak and Metrolink train schedules, but it is unclear how those comments have been incorporated into the project planning/design.	R. Vandenberg	2/25/2025					
	Ch 8 / 8.4.1.1 p. 8-29 & 8-30	Discussion of ARTIC site does not recognize or acknowledge ongoing development and pedestrian circulation planning underway to enhance connectivity of ARTIC to existing and planned development and OC River Walk (Santa Ana River Trail). These projects are identified in Chapter 3.19 Table 3.19-2	R. Vandenberg	2/25/2025					
	Appendix 2-E / 6.1 p. 13	Operations Control Center - the means for coordinated train dispatch in a shared corridor is not identified.	R. Vandenberg	2/26/2025					
	Appendix 2-E	This high-level, statewide discussion of HSR operations does not address the specific requirements of the Los Angeles-Anaheim shared corridor.	R. Vandenberg	2/27/2025					
	Appendix 3.1-A / Transportation p. 3.1-A.3 thru A.25	Tabular listing of consistency with various transportation policies does not include Metrolink and LOSSAN plans that are referenced elsewhere in the document.	R. Vandenberg	2/28/2025					

CALIFORNIA HIGH-SPEED RAIL PROJECT

Los Angeles to Anaheim Project Section

RESPONSIBLE AGENCY COMMENT & RESPONSE LOG

Project: HSR - Los Angeles to Anaheim (LA-A)		Updated	2/28/2025					
Agency: Orange Country Transportation Authority (OCTA)	Submittal: Administrative Draft EIR/EIS for Responsible Agency Review							
Comments				**Responses** Disposition Code: A = Have Incorporated / Will Incorporate; B = Have Clarified / Will Clarify; C = Delete Comment; D = Will Incorporate in Next Submittal; E = Discuss / Clarify with Authority				
Comment Number	Page/Sect Number	Comments	Reviewers Name	Date	Disposition	Response	Respond Initials	Date	Verification (QC name/date)
1	Impact avoidance and minimization features (IAMFs)	Suggest IAMF review to ensure each measure specifies which entity is responsible for the actions described therein.	Legal	2/24/2025					
2	California Environmental Quality Act (CEQA) Mitigation	Please confirm that all feasible mitigation has been imposed.	Legal	2/24/2025					
3	CEQA Mitigation Measures: Enforceability and Documenting Compliance with Mitigation Measures	Some mitigation measures include strong enforceability and documentation requirements. Others do not. Suggest a comprehensive review of mitigation measures for enforceability and documentation requirements.	Legal	2/24/2025					
4	CEQA Mitigation Measures: Review for internal consistency	Example: Page 7-9, Significant and Unavoidable Cultural Resources Impacts. Refers to CUL-MM #13, but the Cultural Resources section does not include mitigation measure #13 (at least in the end of chapter summary)?	Legal	2/25/2025					
5	CEQA Mitigation Measures: Mitigation Measures Calling for the Development of a Future Plan	To avoid CEQA deferral arguments, these types of mitigation measures should each have: (1) specific performance standard(s); and (2) a menu of options to achieve those standards.	Legal	2/26/2025					
6	CEQA Mitigation Measures: Incorporation of IAMF requirements or other contractual agreements	Suggest including minimum criteria/requirements from other sources to make the mitigation measure understandable without reverting to the appendices or other documents, such as who is responsible for compliance, when compliance is required, what are the applicable performance standards, what are the options to achieve the performance standards.	Legal	2/27/2025					

7	Station Options	OCTA should provide feedback on the proposed Fullerton station option and any concerns about its proposed use in the document.	Legal	2/28/2025					
8	AQ-MM#1: Offset Project Construction Emissions in the SCAB through SCAQMD Emissions Offsets Program	Would any local, offsite mitigation be feasible? If possible, define "equivalent emissions reductions." Add requirements to maintain offset records and documentation.	Legal	3/1/2025					
9	AQ-MM#2: Requirements for Use of Zero-Emission or Near-Zero-Emission Vehicles and Off-Road Equipment to Reduce Construction Emissions	"Goals" create enforceability issues under CEQA. Can this measure be made more specific? (Acknowledged that emissions from this mitigation measure have not been quantified and do not appear to be relied on in the analysis).	Legal	3/2/2025					
10	AQ-MM#3: Reduce the Potential Impact of Stationary Sources	Revise to increase enforceability – who will verify that best industry practices have been implemented and when would such verification occur? Prior to construction?	Legal	3/3/2025					
11	N&V-MM#1: Construction Noise Mitigation Measures	Specify criteria for monitoring locations, personnel qualifications, frequency of monitoring and equipment to be used, and a requirement to maintain monitoring records and equipment logs. Specify actions to be taken if the noise limitations are exceeded.	Legal	3/4/2025					
12	N&V-MM#4: Implement Operational Vibration Mitigation Measures	Add wheel maintenance and inspection requirements, add performance criteria if possible, and specify corrective actions.	Legal	3/5/2025					
13	Section 3.6.7.1: PUE-MM#2: Water Demand Analysis for Water Supplies at Stations for Operation	Is 6 months prior to commencement of operations sufficient to permit coordination with water sources as described in the balance of the mitigation measure?	Legal	3/6/2025					
14	GEO-MM#1: Geologic and Geotechnical Investigation	Specify by when the investigation must be completed.	Legal	3/7/2025					

15	HMW-MM#1: Limit Use of Extremely Hazardous Materials near Schools during Construction	Specify a menu of options to achieve the performance standard. Training? Verification procedures? Auditing / monitoring?	Legal	3/8/2025					
16	HMW-MM#2: Remediation of Areas Associated with Superfund Sites or other Contaminated Properties Prior to Construction	Specify a menu of options for “potential controls to ensure protection of human health and the environment”	Legal	3/9/2025					
17	PR-MM#1: Temporary Restricted Access to Park Facilities during Construction	Require documentation of pre-construction trail conditions and restoration to same post-construction. Suggest adding public notice of detours and outreach.	Legal	3/10/2025					
18	PR-MM#2: Providing Park Access	Require documentation of pre-construction park conditions and restoration to same post-construction. A menu of options to achieve the performance standard should be provided. Suggest adding public notice of detours and outreach. Suggest adding coordination with park operators / managers for permanent access changes.	Legal	3/11/2025					
19	AVQ-MM#1: Minimize Visual Disruption from Construction Activities	Require pre-construction documentation. Specify monitoring requirement for plant survival / replacement.	Legal	3/12/2025					
20	AVQ-MM#2: Minimize Light Disturbance during Construction	Consider maximum light levels at property boundaries (taking into account pre-construction ambient lighting and whether in a residential area, industrial area etc.), lighting height limitations. Shielding options should be provided.	Legal	3/13/2025					
21	Same AVQ-MM#3: Incorporate Design Aesthetic Preferences into Final Design and Construction of Nonstation Structures	How is compliance measured / enforced? How would conflicts be resolved?	Legal	3/14/2025					

22	AVQ-MM#4: Provide Vegetation Screening along At-Grade and Elevated Guideways Adjacent to Residential Areas	Specify when partial screening is sufficient as opposed to full screening. Or remove “partially.” Specify monitoring requirement for survival / replacement.	Legal	3/15/2025					
23	AVQ-MM#5: Replant Unused Portions of Land Acquired for the Los Angeles to Anaheim Project Section	Require pre-construction documentation of vegetation to be removed. Require irrigation system monitoring. Specify a minimum setback from infrastructure? Minimum vegetative coverage?	Legal	3/16/2025					
24	AVQ-MM#7: Incorporate Design Criteria for Elevated Guideways and Station Elements that Can Adapt to Local Context	Suggest including timeframes for consultation process.	Legal	3/17/2025					
25	TRAN-MM#1: Modify Traffic Signal Controls; TRAN-MM#2: Restripe Intersections; TRAN-MM#4: Add Exclusive Turn Lanes to Intersections; TRAN-MM#5: Add New Lanes to Roadway	Specify when restriping would occur / when completion would be required if the mitigation measure is ultimately implemented under the National Environmental Policy Act (NEPA).	Legal	3/18/2025					
26	CUL-MM#4: Minimize Adverse Effects through Relocation of Historic Buildings and Structures	Specify a menu of options to achieve the stated performance standards.	Legal	3/19/2025					
27	CUL-MM#8: Repair of Inadvertent Damage	Suggest adding pre and post construction documentation requirements. Specify a menu of options to achieve the stated performance standards.	Legal	3/20/2025					

28	CUL-MM#12: Design Review for Intrusion-Protection Barriers	Specify a menu of options to achieve the stated performance standards.	Legal	3/21/2025					
29	CUM-N&V-MM#1: Consult with Agencies Regarding Construction Activities	Specify a minimum advance consultation timeframe. Include monitoring requirements. If possible, state a performance standard and a menu of options to achieve the standard.	Legal	3/22/2025					

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

September 24, 2020

Mr. Mark McLoughlin
Attn: Los Angeles-Anaheim
California High-Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: **Revised Notice of Preparation and Notice of Intent for the Environmental Impact Report/Statement for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project**

Dear Mr. McLoughlin:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Revised Notice of Preparation (NOP) under the California Environmental Quality Act (CEQA) and Notice of Intent (NOI) under the National Environmental Policy Act (NEPA) for the Environmental Impact Report/Statement (EIR/EIS) for the Los Angeles (Union Station) to Anaheim (Anaheim Regional Transportation Intermodal Center) Project Section (Project) of the California High-Speed Rail Authority (CHSRA) Project. OCTA is a joint powers authority (JPA) member of the Southern California Regional Rail Authority (SCRRA), operated by Metrolink. The Project's intent to provide high-speed intrastate ground transportation should not negatively affect local and intercounty rail services such as Metrolink that serve approximately 2.9 million (fiscal year 2019) trips annually. The following comments are provided for your consideration:

- Current passenger rail services - OCTA retains certain rights over the Burlington Northern Santa Fe (BNSF) corridor in the Fullerton to Los Angeles section. These rights enable OCTA to sponsor critical commuter rail service between Orange County and Los Angeles. The ability to fully retain and realize these rights is crucial as any impairment could result in reduced commuter rail service, diverting trips to highways, and result in increases in highway traffic and vehicle miles traveled with associated negative environmental impacts. Furthermore, the rights and related commuter rail services are critical elements of a multimodal expenditure plan funded by the local sales tax measure. Regionally, the ability to continue to offer balanced multimodal solutions is a critical element of the OCTA Long-Range Transportation Plan. The EIR/EIS should thoroughly evaluate and address these issues and acknowledge OCTA's ownership of the railroad right-of-way between Fullerton and Anaheim, which was acquired for the purposes of providing expanded Metrolink service. These property rights and our objectives should not be undermined as a result of the Project.

- OCTA previously provided comments on the preliminary engineering for project definition for the CHSRA Los Angeles to Anaheim segment. Although CHSRA provided responses to OCTA's comments, we look forward to a mutually satisfactory resolution to the concerns previously raised by OCTA.
- In addition, BNSF, OCTA, and the Riverside County Transportation Commission (RCTC) are part of the San Bernardino Subdivision Shared-Use Agreement (SUA), which generally grants OCTA and RCTC exclusive rights for "passenger transportation uses." Any third party wishing to utilize the segment between Redondo Junction and Fullerton must obtain approval from OCTA and RCTC in addition to BNSF. A memorandum of understanding between CHSRA and BNSF does not supersede the terms of the SUA. Any impacts to the SUA must be thoroughly analyzed in the EIR/EIS.
- OCTA is a "responsible agency" under CEQA and a "cooperating agency" under NEPA for the Project. OCTA owns the railroad right-of-way between south of Fullerton to the Orange/San Diego county line, is a JPA member of SCRRA, as well as a party to the SUA. Accordingly, OCTA must be designated as a responsible agency and cooperating agency under CEQA and NEPA, respectively.
- OCTA is formally requesting to be added to the notification and distribution lists for all CEQA notices, public meeting notices, and public meeting/hearing notices relating to the Los Angeles to Anaheim segment of the Project under CEQA and local and state law, including the Ralph M. Brown Act and the Bagley-Keene Act.
- As a JPA member, OCTA is also partnering with Metrolink to implement the Southern California Optimized Rail Expansion Program. The CHSRA EIR/EIS must assess any potential impacts to these planned improvements.
- Future passenger rail capacity - OCTA has made significant investments including the purchase of right-of-way for capacity, track and rail communication enhancements, turnaround facilities, stations, and rolling stock to allow OCTA to offer up to 76 daily Metrolink trains in Orange County. OCTA and Metrolink have invested heavily on a future Metrolink Placentia Station that has been environmentally cleared and ready to be constructed.
- In addition, OCTA has supported publicly-funded triple track improvements and grade separations beyond the Orange/Los Angeles county line that enable the future expansion capacity to be realized. The EIR/EIS should assess the environmental impacts of any compromises to OCTA's ability to offer this level of service. Lastly, the EIR/EIS should clarify that the reliability of Metrolink operations in the Fullerton to Los Angeles segment will not be negatively affected by any added burdens on the constrained shared passenger and freight corridor.
- Incremental freight rail impacts - The proposed Colton Facility is anticipated to accommodate added freight trains from the Los Angeles/Long Beach ports

to Colton, which could increase over time. The added BNSF freight traffic would likely be travelling through the communities of Buena Park, Fullerton, Anaheim, Placentia, and Yorba Linda. OCTA recently completed a $650 million program consisting of seven grade separation projects that was partially necessitated to address the increase in freight movement related to the expansion of the Los Angeles/Long Beach ports. The EIR/EIS should thoroughly disclose, assess, and address any of the environmental impacts related to operation/queuing of additional freight trains through Orange County.

- Truck traffic – as noted by CHSRA, the purpose of the revised NOP/NOI was to solicit input on additional project components that would be required in Colton and Lenwood, which were not included when the project was initially scoped in 2007. The EIR/EIS should address the environmental effects of any potential for the shift from freight to truck traffic in Orange County that may be necessary to support the Project. It is not clear how existing truck freight traffic in Orange County would be affected as a result of the proposed changes to freight rail operations. Environmental impacts of any associated truck traffic movements shift should be studied and addressed.
- Throughout the construction of the Project, Metrolink will be expected to continue to provide uninterrupted service. Any impacts to Metrolink service during the construction or operation of the Project must be assessed and mitigated in the EIR/EIS.

OCTA appreciates the opportunity to provide meaningful input on the revised NOP/NOI scoping process, and we look forward to working with the CHSRA to integrate the aforementioned comments into the EIR/EIS analysis. Furthermore, OCTA looks forward to becoming a more active participant in the development of the EIR/EIS so that any impacts to Orange County will be adequately analyzed addressed and mitigated. OCTA understands our partner agencies, RCTC and the San Bernardino County Transportation Authority, have raised similar concerns regarding the Project. If you have any questions or comments, please contact Kia Mortazavi at (714) 560-5741 or at kmortazavi@octa.net.

Sincerely,



Darrell E. Johnson
Chief Executive Officer

DEJ:dp

January 22, 2024

Ms. LaDonna DiCamillo
Southern California Regional Director
California High Speed Rail Authority
Attn: Los Angeles-Anaheim
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: **Los Angeles to Anaheim Project Section Supplemental Alternatives Analysis Report**

Dear Ms. DiCamillo:

The California High Speed Rail Authority (CHSRA) recently released the Los Angeles to Anaheim Project Section Supplemental Alternatives Analysis (SAA) Report proposing the Shared Passenger Track Alternative without sufficient consultation with the Orange County Transportation Authority (OCTA). OCTA, as the railroad owner and County Transportation Commission, has several concerns with the lack of coordination, the adequacy of the analysis, and inconsistent justifications used to support this alternative as described below.

- OCTA was not adequately consulted on the development of the Shared Passenger Track Alternative despite being Orange County's transportation planning agency and railroad owner.
- The Shared Passenger Track Alternative does not offer high-speed service, conflicting with legislative requirements. Compared to other alternatives, relying on reduced speeds and service levels contradicts the purpose of high-speed rail connectivity.
- Given the proximity of the Shared Passenger Track Alternative to disadvantaged communities, potential community and environmental impacts require more analysis. Changes in freight operations to accommodate the proposed alternative suggest consideration of cumulative impacts with emphasis on sensitive communities.
- Implications of the proposal on existing shared track agreements and current and planned passenger rails services must be more clearly analyzed and described.
- More detail is needed on the Buena Park station relocation, track reconfiguration, staging tracks, shared maintenance costs, and modeling assumptions.
- CHSRA appears to have delegated the Fullerton station improvements to the Southern California Regional Rail Authority (SCRRA) as part of the

Fullerton Interlocker Project that is currently led by SCRRA. The proposed changes require more discussion so impacts to current passenger rail services due to relocation of the platform can be better understood by OCTA and the City of Fullerton.

Please refer to the attachments for more details on OCTA's primary concerns. OCTA requests involvement as an active participant in developing alternatives. This will ensure that impacts to Orange County are fully analyzed and addressed. We look forward to meeting with you to discuss the rationale for the Shared Passenger Track Alternative and rejection of the other alternatives. Please contact me at (714) 560-5741 or kmortazavi@octa.net for follow-up. Thank you.

Sincerely,



Kia Mortazavi
Executive Director, Planning

KM:dp
Attachments

- The Orange County Transportation Authority (OCTA) was not adequately consulted on the development of the Shared Passenger Track Alternative. As the railroad owner and designated County Transportation Commission, OCTA is a key stakeholder who has sponsored commuter rail service in the corridor for more than three decades as well as the railroad owner for the Orange County portion of the Fullerton to Anaheim segment. We understand the California High Speed Rail Authority (CHSRA) and the Southern California Regional Rail Authority (SCRRA) have been in discussion regarding the project elements. OCTA must be directly involved in discussions of project alternatives that impact the Fullerton to Anaheim segment owned by OCTA.

- The proposed Shared Passenger Track Alternative does not offer high-speed service to Los Angeles. CHSRA staff has suggested a one-seat ride to the Bay Area as a substitute and indicated that CHSRA is not obligated to provide high-speed service to Anaheim. However, the enabling CHSRA statutes call for "constructing a high-speed train system that connects the San Francisco Transbay Terminal to Los Angeles Union Station and Anaheim." Therefore, the proposed alternative does not meet the legislative requirements.

The stated reasons for eliminating the Freeway Tunnel and the Union Pacific Railroad alternatives include cost, construction challenges, and short-term construction impacts related to tunneling. Cost should not be a factor to eliminate an alternative under the California Environmental Quality Act (CEQA) process. The purpose of CEQA analysis is to assess the potential environmental impacts. In this respect, the short-term and long-term environmental impacts of the Shared Passenger Track Alternative should be given equal consideration prior to any decision on a preferred alternative.

- Given the proximity of the Shared Passenger Track Alternative to disadvantaged communities, potential community and environmental impacts require more analysis. Without the proper community impacts assessment and environmental justice, and related Title VI analyses, the introduction and elimination of alternatives would not meet the spirit and intent of the CEQA public disclosure process. Furthermore, implementing the Shared Passenger Track Alternative has the potential to induce additional rail freight traffic as stated in the Supplemental Alternatives Analysis (SAA). This raises important questions about potential cumulative environmental, health, and community impacts, particularly to disadvantaged communities. Consequently, it is crucial to examine how these communities have been engaged in the public participation process to ensure their voices are heard and their concerns are adequately addressed. Please provide more information on how the Shared Passenger Track Alternative would mitigate the cumulative impacts of the induced rail freight traffic impacts in north Orange County.
- The analysis in the SAA fails to demonstrate how it would mitigate potential impacts to the shared use agreement between BNSF, OCTA, and the Riverside County Transportation Commission, which are part of the San Bernardino Subdivision Shared Use Agreement.

- The SAA document relies on the reduction of HSR passenger service levels and speeds as a mitigation strategy. This appears to conflict with the primary purpose of the project to connect the megaregions of the state through a high-speed rail system.

- The report states that track reconfiguration may be considered at the Fullerton station (to ensure BNSF access and/or to reduce project footprint or costs). The SAA needs to provide more information and details about the impacts of the track reconfiguration to Fullerton Station and the assumed plans for using the existing tracks at that location.

- The SAA relies on additional staging tracks outside the project corridor (considered freight rail mitigation). CHSRA must better analyze the viability and impacts of the staging tracks before selecting the Shared Passenger Track Alternative as the preferred alternative.

- CHSRA reports identify the potential for shared maintenance costs with other passenger rail services as a feature of the Shared Passenger Track Alternative. OCTA must review the information that supports this statement and is concerned with the implications of this concept on the maintenance cost shares of the other rail operators.

- CHSRA has not provided the modeling assumptions for the Shared Passenger Track Alternative. This information will assist OCTA to better assess:
  - Assumed operating speeds in relation to the project's legislative intent;
  - Freight utilization and maintaining capacity for future increases in Metrolink and Surfliner passenger service levels;
  - Impacts to Metrolink's Southern California Optimized Rail Expansion (SCORE) Program implementation; and
  - The effects of electrification on OCTA-owned tracks and the impact on intracounty commuter rail service between Fullerton and south Orange County.

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

September 24, 2020

Mr. Mark McLoughlin
Attn: Los Angeles-Anaheim
California High-Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: **Revised Notice of Preparation and Notice of Intent for the Environmental Impact Report/Statement for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project**

Dear Mr. McLoughlin:

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- Current passenger rail services - OCTA retains certain rights over the Burlington Northern Santa Fe (BNSF) corridor in the Fullerton to Los Angeles section. These rights enable OCTA to sponsor critical commuter rail service between Orange County and Los Angeles. The ability to fully retain and realize these rights is crucial as any impairment could result in reduced commuter rail service, diverting trips to highways, and result in increases in highway traffic and vehicle miles traveled with associated negative environmental impacts. Furthermore, the rights and related commuter rail services are critical elements of a multimodal expenditure plan funded by the local sales tax measure. Regionally, the ability to continue to offer balanced multimodal solutions is a critical element of the OCTA Long-Range Transportation Plan. The EIR/EIS should thoroughly evaluate and address these issues and acknowledge OCTA's ownership of the railroad right-of-way between Fullerton and Anaheim, which was acquired for the purposes of providing expanded Metrolink service. These property rights and our objectives should not be undermined as a result of the Project.

- OCTA previously provided comments on the preliminary engineering for project definition for the CHSRA Los Angeles to Anaheim segment. Although CHSRA provided responses to OCTA's comments, we look forward to a mutually satisfactory resolution to the concerns previously raised by OCTA.
- In addition, BNSF, OCTA, and the Riverside County Transportation Commission (RCTC) are part of the San Bernardino Subdivision Shared-Use Agreement (SUA), which generally grants OCTA and RCTC exclusive rights for "passenger transportation uses." Any third party wishing to utilize the segment between Redondo Junction and Fullerton must obtain approval from OCTA and RCTC in addition to BNSF. A memorandum of understanding between CHSRA and BNSF does not supersede the terms of the SUA. Any impacts to the SUA must be thoroughly analyzed in the EIR/EIS.
- OCTA is a "responsible agency" under CEQA and a "cooperating agency" under NEPA for the Project. OCTA owns the railroad right-of-way between south of Fullerton to the Orange/San Diego county line, is a JPA member of SCRRA, as well as a party to the SUA. Accordingly, OCTA must be designated as a responsible agency and cooperating agency under CEQA and NEPA, respectively.
- OCTA is formally requesting to be added to the notification and distribution lists for all CEQA notices, public meeting notices, and public meeting/hearing notices relating to the Los Angeles to Anaheim segment of the Project under CEQA and local and state law, including the Ralph M. Brown Act and the Bagley-Keene Act.
- As a JPA member, OCTA is also partnering with Metrolink to implement the Southern California Optimized Rail Expansion Program. The CHSRA EIR/EIS must assess any potential impacts to these planned improvements.
- Future passenger rail capacity - OCTA has made significant investments including the purchase of right-of-way for capacity, track and rail communication enhancements, turnaround facilities, stations, and rolling stock to allow OCTA to offer up to 76 daily Metrolink trains in Orange County. OCTA and Metrolink have invested heavily on a future Metrolink Placentia Station that has been environmentally cleared and ready to be constructed.
- In addition, OCTA has supported publicly-funded triple track improvements and grade separations beyond the Orange/Los Angeles county line that enable the future expansion capacity to be realized. The EIR/EIS should assess the environmental impacts of any compromises to OCTA's ability to offer this level of service. Lastly, the EIR/EIS should clarify that the reliability of Metrolink operations in the Fullerton to Los Angeles segment will not be negatively affected by any added burdens on the constrained shared passenger and freight corridor.
- Incremental freight rail impacts - The proposed Colton Facility is anticipated to accommodate added freight trains from the Los Angeles/Long Beach ports

to Colton, which could increase over time. The added BNSF freight traffic would likely be travelling through the communities of Buena Park, Fullerton, Anaheim, Placentia, and Yorba Linda. OCTA recently completed a $650 million program consisting of seven grade separation projects that was partially necessitated to address the increase in freight movement related to the expansion of the Los Angeles/Long Beach ports. The EIR/EIS should thoroughly disclose, assess, and address any of the environmental impacts related to operation/queuing of additional freight trains through Orange County.

- Truck traffic – as noted by CHSRA, the purpose of the revised NOP/NOI was to solicit input on additional project components that would be required in Colton and Lenwood, which were not included when the project was initially scoped in 2007. The EIR/EIS should address the environmental effects of any potential for the shift from freight to truck traffic in Orange County that may be necessary to support the Project. It is not clear how existing truck freight traffic in Orange County would be affected as a result of the proposed changes to freight rail operations. Environmental impacts of any associated truck traffic movements shift should be studied and addressed.
- Throughout the construction of the Project, Metrolink will be expected to continue to provide uninterrupted service. Any impacts to Metrolink service during the construction or operation of the Project must be assessed and mitigated in the EIR/EIS.

OCTA appreciates the opportunity to provide meaningful input on the revised NOP/NOI scoping process, and we look forward to working with the CHSRA to integrate the aforementioned comments into the EIR/EIS analysis. Furthermore, OCTA looks forward to becoming a more active participant in the development of the EIR/EIS so that any impacts to Orange County will be adequately analyzed addressed and mitigated. OCTA understands our partner agencies, RCTC and the San Bernardino County Transportation Authority, have raised similar concerns regarding the Project. If you have any questions or comments, please contact Kia Mortazavi at (714) 560-5741 or at kmortazavi@octa.net.

Sincerely,



Darrell E. Johnson
Chief Executive Officer

DEJ:dp

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

November 15, 2024

Attn: Simon Tse and Amit Joshi
Los Angeles-Anaheim
California High Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Via email: simon.tse@hsr.ca.gov and amit.joshi@hsr.ca.gov

Subject: Los Angeles to Anaheim Section Updated Preliminary Engineering for Project Definition

Dear Mr. Tse and Mr. Joshi,

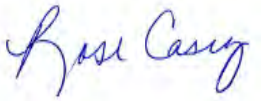
On October 7, 2024, the California High Speed Rail Authority (CHSRA) provided the Orange County Transportation Authority (OCTA) with the updated Preliminary Engineering for Project Definition (PEPD) documents. OCTA is a Joint Powers Authority member of the Southern California Regional Rail Authority, operated by Metrolink. OCTA previously provided comments on the Supplemental Alternatives Analysis, the Revised Notice of Preparation (NOP), and the Notice of Intent (NOI) for the Environmental Impact Report/Statement (for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project (see attached September 24, 2020, and January 22, 2024 letters). In addition, OCTA has reviewed the PEPD; see below for a summary of our comments. See Attachment A for more details.

- The Fullerton train station is the busiest passenger rail station in Orange County. OCTA would like to better understand how the station would be modified and addressed in the Draft Environmental Impact Report/Statement.
- Various XO (crossover) configurations appear to limit operational flexibility for Metrolink trains. OCTA requests further coordination with Metrolink to minimize potential impacts.
- Please confirm that Metrolink minimum clearance requirements will be met for the shared track concepts.
- Several concepts involve the demolition of existing railroad bridges and modifications of grade separations, such as those located at Beach Boulevard, Brea Creek, Dale Street, Gilbert Street, and Harbor Boulevard. Clarification is needed on provisions for temporary parapets or other measures to retain the California Public Utility Commission walkway during construction. Additionally, construction phasing should be considered to minimize impacts to passenger rail operations.
- Discuss and negotiate with OCTA on the shared use and right of way impacts south of Fullerton Junction to Anaheim Regional Transportation Intermodal Center (ARTIC) station.

- Evaluate the Fullerton Station passenger path of travel from the amenities on the north side of the station to the new proposed platform on the south side to compare the additional time and distance burden on the passengers, if any.
- Coordination should be conducted for the ARTIC site plan, as needed, with ongoing final design efforts by the City of Anaheim for the "Building Bridges to Transit" project which includes new active transportation connections, pedestrian bridges, and riverbank trail realignment.

OCTA appreciates the opportunity to provide meaningful input, and we look forward to working with the CHSRA to address the aforementioned comments. Furthermore, OCTA looks forward to continuing to be an active participant in the development of the Los Angeles to Anaheim updated PEPD so that any impacts to Orange County will be adequately analyzed, addressed, and mitigated. If you have any questions or comments, please contact me at 714-560-5729 or rcasey@octa.net or Dan Phu at 714-560-5907 or dphu@octa.net.

Sincerely,



Rose Casey
Planning, Executive Director

Attachments: Attachment A: PEPD Comments
Attachment B: Revised NOP and NOI for the EIR/EIS for the Los Angeles to Anaheim Project Section of the CHSRA Project dated September 24, 2020
Attachment C: Los Angeles to Anaheim Project Section Supplemental Alternative Analysis Report dated January 22, 2024

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

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REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
1	R. Vandenberg	Rheia Consulting				Transmittal Letter	NA	Preferred alternative does not include HSR Station at Fullerton. How will HSR Fullerton Station and Modified Metrolink Fullerton Station be addressed in the DEIS/DEIR?				
PEDP VOLUME 3.1												
2	A. Shah	HDR Engineering		X		GE-D0101	General	Suggest having sheet after symbols because it is unclear what the blue linework is				
3	A. Shah	HDR Engineering		X		GE-B0101	General	Metrolink design criteria requires 15' minimum track spacing. Need to review and file RFSDCs for where Metrolink commuter tracks are shown with reduced track spacing.				
4	A. Shah	HDR Engineering		X		GE-B0101	General	Max design speed for this corridor is 110mph				
5	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	Fullerton Junction - viability of overall configuration needs to be confirmed with simulations that incorporate future Metrolink service plans for OC, IEOC, and Riverside Lines, allowing for normal variations in train operations				
6	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	Certain XO configurations appear to limit operational flexibility for Metrolink trains, including: • No XO are provided on the north side of the Relocated Metrolink Commerce Station • XO configuration south of Relocated Buena Park Station • At CP Santa Fe Springs (MP 155.0), SB operation on M3 (if required) does not have access to the west Norwalk/Santa Fe Springs Metrolink Station platform • 2 LH XO rather than universal configuration north of Fullerton Station • CP Orangethorpe (MP 166.2) includes 2 LH crossovers rather than universal configuration				
7	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	26th St LMF yard lead configuration could affect shared passenger track operations as: • NB access into 26th St LMF would require NB HSR trains to operate on M4 from CP Bandini (MP 148.9) to the LMF lead (approx MP 146) • NB access out of the 26th St LMF would require NB HSR trains to operate on M4 from the LMF lead (approx MP 144.5) to CP Olympic, north of the Redondo Jcn Flyover.				
8	R. Vandenberg	Rheia Consulting		X		TT-D3001	Track Alignment	In Section C-C, please demonstrate that proposed 10' horizontal clearance between M1 track and OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
9	R. Vandenberg	Rheia Consulting		X		TT-D3003	Track Alignment	How will ROW access be controlled at industry sidings?				
10	R. Vandenberg	Rheia Consulting		X		TT-B3001, TT-D3005, TT-D3006, TT-D3015, TT-D3016, TT-D3029. TT-D3030, TT-D3031	Track Alignment	On aerial structure, please demonstrate that proposed min. 10.67' horizontal clearance to OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
11	R. Vandenberg	Rheia Consulting		X		TT-D3008	Track Alignment	Section L-L: identify which station this is (Commerce Station)				
12	R. Vandenberg	Rheia Consulting		X		TT-D3011	Track Alignment	Section R-R at 605 Fwy: please clarify what 10' horizontal clearance is to… if to bridge pier, demonstrate that there is adequate clearance for pier protection that will be required for Caltrans structure				
13	R. Vandenberg	Rheia Consulting		X		TT-D3023	Track Alignment	At retained fill sections through Buena Park, can east (left) walkway be moved outside OCS poles (like at west/right)?				
14	A. Shah	HDR Engineering		X		TT-D3027	Track Alignment	Need a dimension to the intertrack fence from the CL of track				
15	R. Vandenberg	Rheia Consulting		X		TT-D3028	Track Alignment	Section NN-NN at Fullerton Jct: please explain clearance between BNSF M3 and SCRRA MT1 which is shown as 0' to 108'. Where 0', is this a shared track?				
16	R. Vandenberg	Rheia Consulting		X		TT-D1503, TT-D1603	Track Alignment	It would be useful to show in Plan and Profile sheets which tracks are intended solely for passenger train operations, which tracks are dedicated for freight use, and which tracks would support shared passenger / freight operations.				

OCTA

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17	G. Jennings	Mott MacDonald		X		TT-D1581	Track Alignment	NW end of new station platforms have horizontal/vertical curvature for New Metrolink Buena Park Station. Depending on train stopping positions, the risk to platform train interface (PTI) could be minimal but is there opportunity to remove curvature for a new station and de-risk construction and PTI? Note the platform location is not shown on the profile which would aid understanding (platforms are identified in other drawings)				
18	G. Jennings	Mott MacDonald		X		TT-D1584, TT-D1592, TT-D1621, TT-D1622	Track Alignment	There are a number of turnout/crossover units in a complex arrangement which are located on (or are in close proximity) to the underpasses. This imparts a risk in terms of differential track stiffness (due to the stiff bridge structure) for operationally critical assets with impacts on maintenance and the risk/consequence of derailment. How has the risk been considered/assessed/mitigated, as additonal landtake may be required to relocate the complex turnout/crossover units? Also relates to grade separation drawings ST-K1271, ST-K3301, ST-K1571 in volume 3.3 and drawing B-1 in volume 3.3A				
19	G. Jennings	Mott MacDonald		X		TT-D1599	Track Alignment	No.11 and No. 20 Turnout are located in close proximity to the Fullerton station platform ends. Noted that train control systems are not part of this contract but this distance may be a challenge for signal standback and overlaps, has this be considered?				
20	A. Shah	HDR Engineering		X		TT-D1599	Track Alignment	Will the existing ped bridge be protected in place or removed?				
21	R. Vandenberg	Rheia Consulting		X		TT-D1619	Track Alignment	Operational implications of shared use of proposed HST overnight storage lead with UPRR local freight movement needs to be better understood (connection to UP Tustin Branch)				
22	R. Vandenberg	Rheia Consulting		X		TT-D1604	Track Alignment	100-ft min. is required between #20 TO PS and Orangethorpe Ave GC				
23	R. Vandenberg	Rheia Consulting		X		TT-D1604	Track Alignment	Show PS to existing Metrolink storage track south of Orangethorpe Ave				
24	J. Lee	OCTA		X		General	Track Alignment	OCS poles shown throughout the plans will reduce the overall usable ROW for OCTA and the ability for expansion in the future				
25	J. Lee	OCTA		X		General	ROW	The dedicated HSR storage tracks proposed will occupy most of OCTA's ROW and prevent the owner from future service expansion and other uses				
26	J. Lee	OCTA		X		General	ROW	Use of OCTA's ROW for HSR as shared use including new improvements should be discussed and agreed upon				
27	J. Lee	OCTA		X		General	ROW	ROW discussions and negotiations between HSR and BNSF only apply to the corridor north of Fullerton Junction; need to add a note to discuss and negotiate with OCTA on the corridor south of Fullerton Junction to ARTIC Station				
28	I. Watkins	Mott MacDonald		X		RW-M1598-1560	ROW	Note that agreements will be required for rail and public ROW area adjustments around modified Metrolink Fullerton Station with OCTA. Who will be the lead agency for such agreements?				
29	I. Watkins	Mott MacDonald		X		RW-M1598-1623	ROW	Note that agreements will be required for rail ROW area adjustments around proposed HSR Anaheim Station with OCTA. Who will be the lead agency or such agreements?				
PEDP VOLUME 3.3												
30	A. Evans	Mott MacDonald		X		CV-T0266	Grade Sep	The new alignment near Buena Park Station will move HSR lines closer to residential properties to the south. What mitigation is anticipated in terms of acoustic treatment and/or potential purchase of some of the properties to provide credible offset between residents and the rail corridor?				
31	R. Vandenberg	Rheia Consulting		X		CV-T1267, CV-T1271, CV-T1302	Grade Sep	Beach Blvd / Dale St / Commonwealth Ave grade separation - min. vertical clearance for roadway below RR bridge matches existing (15.5 ft) but would be reduced by falsework during construction. What would vertical clearance be during construction?				
32	R. Vandenberg	Rheia Consulting		X		ST-K1266	Grade Sep	Buena Park Station Platform extends onto Beach Blvd grade separation structure - how will emergency egress be achieved?				

OCTA

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33	R. Vandenberg	Rheia Consulting		X		ST-K3266	Grade Sep	Proposed construction at Beach Blvd grade separation requires demolition of existing bridge parapet wall adjacent to track M1. This would need to be accomplished while maintaining existing M1 track in place until new M1 alignment is constructed to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
34	R. Vandenberg	Rheia Consulting		X		ST-K1269	Grade Sep	Proposed construction at Break Creek requires demolition of existing bridge parapet wall and raised walkway adjacent to track M3. This would need to be accomplished while maintaining existing M3 track in service to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
35	R. Vandenberg	Rheia Consulting		X		ST-K1271	Grade Sep	Proposed construction at Dale St grade separation requires demolition of existing bridge parapet and walkway adjacent to M1 (LA-A SB). This would need to be accomplished while maintaining existing LA-A SB track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
36	R. Vandenberg	Rheia Consulting		X		CV-T3281	Grade Sep	What intrusion protection or other measures are being taken to avoid people/objects getting into trench section adjacent to Artesia Ave?				
37	R. Vandenberg	Rheia Consulting		X		ST-K1291	Grade Sep	Proposed construction at Gilbert St grade separation requires demolition of existing bridge parapet and walkway adjacent to M4. This would need to be accomplished while maintaining existing track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
38	R. Vandenberg	Rheia Consulting		X		ST-K1291, ST-K1541	Grade Sep	Is 2' clearance sufficient for seismic interactions between two RR bridges? Provide relevant codes.				
39	R. Vandenberg	Rheia Consulting		X		ST-K3301	Grade Sep	Commonwealth Ave Section B and Section E - verify no ballast retainer is needed between M3 and LA-A NB due to difference in profile elevation				
40	R. Vandenberg	Rheia Consulting		X		ST-K1311	Grade Sep	Proposed construction at Euclid St requires demolition of existing single-track RR bridge to allow for construction of new 2 track shared bridge. While 5 tracks still available during construction, some of these are used by BNSF for storage. Storage of trains should be precluded during construction to minimize impacts to passenger train operations				
41	R. Vandenberg	Rheia Consulting		X		CV-T1322	Grade Sep	Walnut Ave grade separation proposes 15.67 ft min clearance. Point of measurement in cross section is at roadway crown, clearance at corner of RR bridge soffit should be verified/shown on drawing				
42	R. Vandenberg	Rheia Consulting		X		CV-T1351	Grade Sep	Highland Ave grade separation - min. 15.67 ft clearance matches existing but will be reduced by falsework during construction				
43	R. Vandenberg	Rheia Consulting		X		ST-K1361	Grade Sep	Proposed construction at Harbor Blvd grade separation requires removal of existing bridge fence/barrier next to existing m3 track and walkway next to existing m1 track. Provisions for temporary parapet or other measures to retain CPUC walkway during construction?				
44	R. Vandenberg	Rheia Consulting		X		ST-K1361	Grade Sep	Harbor Blvd grade separation typical section -- is HSR platform cantilevered over existing structure? What is interaction between two bridges?				
45	R. Vandenberg	Rheia Consulting		X		ST-K1571, ST-K1572	Grade Sep	Proposed construction Katella Ave requires construction of half of new RR bridge, demolition of existing RR bridge, then construction of second half of new RR bridge. Verify constructability and clearances between first half of new RR bridge and existing RR bridge. First half of new RR bridge would need to be able to support operation of two tracks but current construction staging concept only provides 6'10" horizontal clearance between M2 and temporary parapet wall.				
46	R. Vandenberg	Rheia Consulting		X		CV-T1583	Grade Sep	Douglass Service Rd proposes 13' minimum clearance under new RR bridge. Does that agree with Metrolink standards?				

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47	R. Vandenberg	Rheia Consulting		X		ST-K1582	Grade Sep	Please check vertical clearance labels and notes				
48	J. Lee	OCTA		X		General	Grade Sep	Construction phasing should be considered for grade separations to maintain full passenger operations during construction and minimize service disruptions				
PEDP VOLUME 3.4												
49	G. Jennings			X		UT-C1585, UT-C1597, UT-C1604, UT-C1621	Utilities	Utilities in close proximity to turnouts/crossovers. Potential for differential track stiffness leading to dynamic forces, voiding and subsequent component failures; and therefore to increased maintenance activity. Risk may be mitigated by utility depth (not indicated on plan) but how has the risk been considered/assessed/mitigated, as additional landtake may be required to relocate the turnout/crossover units?				
50	A. Shah	HDR Engineering		X		UT-C1599	Utilities	Need to detail with retaining wall				
51	J. Lee	OCTA		X		General	Utilities	Utilities under license proposed to be relocated should include relocation costs and potential ROW needed if relocation cannot stay within OCTA's ROW				
52	J. Lee	OCTA		X		General	Utilities	Confirm utility impacts from grade separations are also defined within the utility plans				
53	A. Evans	Mott MacDonald		X		UT-C1599	Utilities	Note largest utility for coordination is City of Fullerton 36" Storm Drain which will need asset protection during the works but not necessarily diversion. Provide guidance on how this line will be protected?				
PEDP VOLUME 3.5												
54	R. Vandenberg	Rheia Consulting		X		AR-B0201	Stations	Commerce Station - proposed orientation of Metrolink platform and station plaza/parking creates a long path of travel for Metrolink riders, with platform accessible only from one end. This does not seem to meet the standard. Metrolink criteria calls for access to be provided at the center of the platform or as close as possible to mini-high platform. Explain how HSR will meet the standard and what the provisions are for emergency egress from the far end of the platform.				
55	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Proposed relocation of Buena Park Station will include a 680' platform with accessible entrance to the transit plaza (via. pedestrian tunnel) and Beach Bvd (via. stair and lift). What ammenities will be provided at this relocated station similar to those provided at the existing Buena Park Station (including number of parking stalls, transit plaza, etc.)?				
56	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	What phase of construction will the entrance to Beach Blvd. be completed as part of the station relocation? This entrance would be complex to retrofit once the station is operational.				
57	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details for potential pedestrian connection to Tulare Street. What phase of construction will the underpass be completed as a part of the station relocation? This element would be complex to retrofit once the station is operational.				
58	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details how staging of works between relocated station and existing station will be arranged to minimize disruption to the public across all transit modes. Details of staging for Metrolink operations, OCTA Buses and transit plaza amenities etc. to be agreed.				
59	J. Lee	OCTA		X		AR-B0601	Stations	With a planned year of construction, the parking capacity needs to be increased to accommodate the service improvements with the station relocation				
60	R. Vandenberg	Rheia Consulting		X		AR-B0601	Stations	What are provisions for emergency egress from south end of Buena Park station platform at Beach Blvd grade separation?				
61	R. Vandenberg	Rheia Consulting		X		AR-B0701	Stations	Offset of two Metrolink platforms creates a very long path of travel for SB Metrolink/Amtrak riders. More direct access should be provided between parking structure and SB platform.				
62	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will there be any connection from the parking structure to the Amtrak/Metrolink center platform? What is the ped routing from the parking structure?				

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63	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will passenger trains be on the BNSF Main Tracks to be able to utilize the existing platform?				
64	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will any of the existing station parking lot on the south side of the station be salvaged?				
65	J. Lee	OCTA		X		AR-B0701	Stations	How will the enhanced sidewalk be accessed from Walnut? It appears there is a retaining wall along Walnut to support the track structure				
66	J. Lee	OCTA		X		AR-B0701	Stations	Loss of station and street parking with direct access from Walnut should be mitigated				
67	J. Lee	OCTA		X		AR-B0701	Stations	Should evaluate the passenger path of travel from the amenities on the north side to the new platform for added time and degradation of convenience. Mitigate as needed.				
	J. Lee	OCTA		X		AR-B0701	Stations	The new platform length should accommodate both future Amtrak and Metrolink services				
68	A. Shah	HDR Engineering		X		AR-B0701	Stations	What are the exit points off of the center platform? Need to consider NFPA 130				
69	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Realignment to Fullerton Station configuration and termination of existing lines get connected through the new proposed 800' station length will require reconfiguration of Walnut Ave also required. Provide details of how this will be addressed.				
70	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Enhancing the interface with the TOD neighborhood area, is there any consideration for additional infrastructure (e.g. parking) for increased ridership as a consequence of High Speed? What improvements and parking encroaches partially in OTCA land will require purchase from other land owners?				
71	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Changes to overpass bridge for passengers to an underpass will require works during track realignment phase. How will HSR ensure existing service will be protected during construction works?				
72	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Note large new bridging structures required over Harbor Rd. to support track and new platform.				
73	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Anticipate that loss of parking for current revenue service will be required to support construction site in the temporary case. How will HSR mitigate this issue?				
74	A. Evans	Mott MacDonald		X		AR-Y9901	Stations	Note, all minimum public areas are met through proposed design for HSR requirements. However, it is unclear whether this includes interchange and/or increased ridership from Metrolink passengers as a consequence of the scheme, i.e. Will HSR improve current platform space/ticketing/amenties for the Metrolink ridership?				
75	A. Evans	Mott MacDonald		X		AR-Y9903	Stations	Parking set at 608 spaces. Is this current or forecasted to what year? Also, is there any consideration for increased ridership as a consequence of the interchange?				
76	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Clarity required on pedestrian modelling for pedestrian link between existing Artic Station, new HSR/Metrolink/Amtrak parking structure and HSR Station facility. How will HSR ensure sufficient space to allow anticipated cross movements between assets?				
77	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Proposed HSR alignment will require additional land purchase from adjacent stakeholders most noteably Angel Stadium. While consideration has been made to HSR drop off zone and assocaited road works, the environmental footprint terminates at North West corner of the site. What other road improvements are expected in order to complete the connection to E Katella Ave? Will HSR cover the cost for land acquisition?				
78	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New HSR platform will require extensive works over Douglass Road and beneath the Orange Fwy 57. Provide explanation for how removal of ~15No support columns can be achieved whilst also maintaining the operation of the Fwy. Any additional bracing structure would likely reduce headrooms beneath the Fwy to both the HSR platforms and potentially existing Metrolink/Amtrak platform.				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
79	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Creation of new platform (including new bridge over Douglass Rd) will likely have impact on existing Metrolink / Amtrak infrastructure. Can HSR provide asset protection to ensure stability of line? If so, how? If not, any loss of revenue until reinstatement of existing infrastructure must be compensated.				
80	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Scheme appears to show curtailment of existing Metrolink/Amtrak platform. Provide possible mitigation efforts for potential impact on services based on this proposal.				
81	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Extended pedestrain undercrossings to serve HSR platform. The proposal offers new elevator access which is seen as a benefit, but also requires new access ramps to be integrated within existing platform width. How will this impact the remaining width of the platforms to ensure safe operational width? Note that during construction this will likely also limit the available length of platform for passengers.				
82	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New Station location will sever existing at grade access to Metrolink/Amtrak platforms (via stairs/ramps) from the south. How will HSR mitigate length of passenger travel routes to reach the new HSR platforms?				
83	A. Evans	Mott MacDonald		X		AR-B0901, AR-C1901	Stations	How will existing underpass between Artic bus terminal site for new station south of tracks be maintained to avoid excessive passenger travel routes for interchange?				
84	R. Vandenberg	Rheia Consulting		X		AR-B0901, AR-C1901, AR-J8901, AR-J8903	Stations	Coordinate ARTIC site plan as needed with ongoing final design efforts by City of Anaheim for "Building Bridges to Transit" project that includes new active transportation connections, ped bridges, and riverbank trail realignment. These ongoing improvements are not reflected in these drawings.				
PEDP VOLUME 3.6												
85	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	What options other than the track alignment and ROW Impact have been considered? Provide details of those options and scoring criteria if implemented for review.				
86	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	It is assumed that a new station entrance will be provided on to Highland Avenue if the Fullerton Station option is implemented. Provide details of secondary means of escape to the west (if required for fire egress). Also provide details of interchange between Metrolink and the proposed HSR station option.				
87	R. Vandenberg	Rheia Consulting		X		AR-B0701A	Stations	Site plan for "unpreferred" alternative at Fullerton Station includes new ped bridge from existing parking structure that improves access to SB Metrolink/Amtrak station as compared to the preferred site plan.				

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

September 24, 2020

Mr. Mark McLoughlin
Attn: Los Angeles-Anaheim
California High-Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: **Revised Notice of Preparation and Notice of Intent for the Environmental Impact Report/Statement for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project**

Dear Mr. McLoughlin:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Revised Notice of Preparation (NOP) under the California Environmental Quality Act (CEQA) and Notice of Intent (NOI) under the National Environmental Policy Act (NEPA) for the Environmental Impact Report/Statement (EIR/EIS) for the Los Angeles (Union Station) to Anaheim (Anaheim Regional Transportation Intermodal Center) Project Section (Project) of the California High-Speed Rail Authority (CHSRA) Project. OCTA is a joint powers authority (JPA) member of the Southern California Regional Rail Authority (SCRRA), operated by Metrolink. The Project's intent to provide high-speed intrastate ground transportation should not negatively affect local and intercounty rail services such as Metrolink that serve approximately 2.9 million (fiscal year 2019) trips annually. The following comments are provided for your consideration:

- Current passenger rail services - OCTA retains certain rights over the Burlington Northern Santa Fe (BNSF) corridor in the Fullerton to Los Angeles section. These rights enable OCTA to sponsor critical commuter rail service between Orange County and Los Angeles. The ability to fully retain and realize these rights is crucial as any impairment could result in reduced commuter rail service, diverting trips to highways, and result in increases in highway traffic and vehicle miles traveled with associated negative environmental impacts. Furthermore, the rights and related commuter rail services are critical elements of a multimodal expenditure plan funded by the local sales tax measure. Regionally, the ability to continue to offer balanced multimodal solutions is a critical element of the OCTA Long-Range Transportation Plan. The EIR/EIS should thoroughly evaluate and address these issues and acknowledge OCTA's ownership of the railroad right-of-way between Fullerton and Anaheim, which was acquired for the purposes of providing expanded Metrolink service. These property rights and our objectives should not be undermined as a result of the Project.

- OCTA previously provided comments on the preliminary engineering for project definition for the CHSRA Los Angeles to Anaheim segment. Although CHSRA provided responses to OCTA's comments, we look forward to a mutually satisfactory resolution to the concerns previously raised by OCTA.
- In addition, BNSF, OCTA, and the Riverside County Transportation Commission (RCTC) are part of the San Bernardino Subdivision Shared-Use Agreement (SUA), which generally grants OCTA and RCTC exclusive rights for "passenger transportation uses." Any third party wishing to utilize the segment between Redondo Junction and Fullerton must obtain approval from OCTA and RCTC in addition to BNSF. A memorandum of understanding between CHSRA and BNSF does not supersede the terms of the SUA. Any impacts to the SUA must be thoroughly analyzed in the EIR/EIS.
- OCTA is a "responsible agency" under CEQA and a "cooperating agency" under NEPA for the Project. OCTA owns the railroad right-of-way between south of Fullerton to the Orange/San Diego county line, is a JPA member of SCRRA, as well as a party to the SUA. Accordingly, OCTA must be designated as a responsible agency and cooperating agency under CEQA and NEPA, respectively.
- OCTA is formally requesting to be added to the notification and distribution lists for all CEQA notices, public meeting notices, and public meeting/hearing notices relating to the Los Angeles to Anaheim segment of the Project under CEQA and local and state law, including the Ralph M. Brown Act and the Bagley-Keene Act.
- As a JPA member, OCTA is also partnering with Metrolink to implement the Southern California Optimized Rail Expansion Program. The CHSRA EIR/EIS must assess any potential impacts to these planned improvements.
- Future passenger rail capacity - OCTA has made significant investments including the purchase of right-of-way for capacity, track and rail communication enhancements, turnaround facilities, stations, and rolling stock to allow OCTA to offer up to 76 daily Metrolink trains in Orange County. OCTA and Metrolink have invested heavily on a future Metrolink Placentia Station that has been environmentally cleared and ready to be constructed.
- In addition, OCTA has supported publicly-funded triple track improvements and grade separations beyond the Orange/Los Angeles county line that enable the future expansion capacity to be realized. The EIR/EIS should assess the environmental impacts of any compromises to OCTA's ability to offer this level of service. Lastly, the EIR/EIS should clarify that the reliability of Metrolink operations in the Fullerton to Los Angeles segment will not be negatively affected by any added burdens on the constrained shared passenger and freight corridor.
- Incremental freight rail impacts - The proposed Colton Facility is anticipated to accommodate added freight trains from the Los Angeles/Long Beach ports

to Colton, which could increase over time. The added BNSF freight traffic would likely be travelling through the communities of Buena Park, Fullerton, Anaheim, Placentia, and Yorba Linda. OCTA recently completed a $650 million program consisting of seven grade separation projects that was partially necessitated to address the increase in freight movement related to the expansion of the Los Angeles/Long Beach ports. The EIR/EIS should thoroughly disclose, assess, and address any of the environmental impacts related to operation/queuing of additional freight trains through Orange County.

- Truck traffic – as noted by CHSRA, the purpose of the revised NOP/NOI was to solicit input on additional project components that would be required in Colton and Lenwood, which were not included when the project was initially scoped in 2007. The EIR/EIS should address the environmental effects of any potential for the shift from freight to truck traffic in Orange County that may be necessary to support the Project. It is not clear how existing truck freight traffic in Orange County would be affected as a result of the proposed changes to freight rail operations. Environmental impacts of any associated truck traffic movements shift should be studied and addressed.
- Throughout the construction of the Project, Metrolink will be expected to continue to provide uninterrupted service. Any impacts to Metrolink service during the construction or operation of the Project must be assessed and mitigated in the EIR/EIS.

OCTA appreciates the opportunity to provide meaningful input on the revised NOP/NOI scoping process, and we look forward to working with the CHSRA to integrate the aforementioned comments into the EIR/EIS analysis. Furthermore, OCTA looks forward to becoming a more active participant in the development of the EIR/EIS so that any impacts to Orange County will be adequately analyzed addressed and mitigated. OCTA understands our partner agencies, RCTC and the San Bernardino County Transportation Authority, have raised similar concerns regarding the Project. If you have any questions or comments, please contact Kia Mortazavi at (714) 560-5741 or at kmortazavi@octa.net.

Sincerely,



Darrell E. Johnson
Chief Executive Officer

DEJ:dp

January 22, 2024

Ms. LaDonna DiCamillo
Southern California Regional Director
California High Speed Rail Authority
Attn: Los Angeles-Anaheim
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: **Los Angeles to Anaheim Project Section Supplemental Alternatives Analysis Report**

Dear Ms. DiCamillo:

The California High Speed Rail Authority (CHSRA) recently released the Los Angeles to Anaheim Project Section Supplemental Alternatives Analysis (SAA) Report proposing the Shared Passenger Track Alternative without sufficient consultation with the Orange County Transportation Authority (OCTA). OCTA, as the railroad owner and County Transportation Commission, has several concerns with the lack of coordination, the adequacy of the analysis, and inconsistent justifications used to support this alternative as described below.

- OCTA was not adequately consulted on the development of the Shared Passenger Track Alternative despite being Orange County's transportation planning agency and railroad owner.
- The Shared Passenger Track Alternative does not offer high-speed service, conflicting with legislative requirements. Compared to other alternatives, relying on reduced speeds and service levels contradicts the purpose of high-speed rail connectivity.
- Given the proximity of the Shared Passenger Track Alternative to disadvantaged communities, potential community and environmental impacts require more analysis. Changes in freight operations to accommodate the proposed alternative suggest consideration of cumulative impacts with emphasis on sensitive communities.
- Implications of the proposal on existing shared track agreements and current and planned passenger rails services must be more clearly analyzed and described.
- More detail is needed on the Buena Park station relocation, track reconfiguration, staging tracks, shared maintenance costs, and modeling assumptions.
- CHSRA appears to have delegated the Fullerton station improvements to the Southern California Regional Rail Authority (SCRRA) as part of the

Fullerton Interlocker Project that is currently led by SCRRA. The proposed changes require more discussion so impacts to current passenger rail services due to relocation of the platform can be better understood by OCTA and the City of Fullerton.

Please refer to the attachments for more details on OCTA's primary concerns. OCTA requests involvement as an active participant in developing alternatives. This will ensure that impacts to Orange County are fully analyzed and addressed. We look forward to meeting with you to discuss the rationale for the Shared Passenger Track Alternative and rejection of the other alternatives. Please contact me at (714) 560-5741 or kmortazavi@octa.net for follow-up. Thank you.

Sincerely,



Kia Mortazavi
Executive Director, Planning

KM:dp
Attachments

- The Orange County Transportation Authority (OCTA) was not adequately consulted on the development of the Shared Passenger Track Alternative. As the railroad owner and designated County Transportation Commission, OCTA is a key stakeholder who has sponsored commuter rail service in the corridor for more than three decades as well as the railroad owner for the Orange County portion of the Fullerton to Anaheim segment. We understand the California High Speed Rail Authority (CHSRA) and the Southern California Regional Rail Authority (SCRRA) have been in discussion regarding the project elements. OCTA must be directly involved in discussions of project alternatives that impact the Fullerton to Anaheim segment owned by OCTA.

- The proposed Shared Passenger Track Alternative does not offer high-speed service to Los Angeles. CHSRA staff has suggested a one-seat ride to the Bay Area as a substitute and indicated that CHSRA is not obligated to provide high-speed service to Anaheim. However, the enabling CHSRA statutes call for "constructing a high-speed train system that connects the San Francisco Transbay Terminal to Los Angeles Union Station and Anaheim." Therefore, the proposed alternative does not meet the legislative requirements.

The stated reasons for eliminating the Freeway Tunnel and the Union Pacific Railroad alternatives include cost, construction challenges, and short-term construction impacts related to tunneling. Cost should not be a factor to eliminate an alternative under the California Environmental Quality Act (CEQA) process. The purpose of CEQA analysis is to assess the potential environmental impacts. In this respect, the short-term and long-term environmental impacts of the Shared Passenger Track Alternative should be given equal consideration prior to any decision on a preferred alternative.

- Given the proximity of the Shared Passenger Track Alternative to disadvantaged communities, potential community and environmental impacts require more analysis. Without the proper community impacts assessment and environmental justice, and related Title VI analyses, the introduction and elimination of alternatives would not meet the spirit and intent of the CEQA public disclosure process. Furthermore, implementing the Shared Passenger Track Alternative has the potential to induce additional rail freight traffic as stated in the Supplemental Alternatives Analysis (SAA). This raises important questions about potential cumulative environmental, health, and community impacts, particularly to disadvantaged communities. Consequently, it is crucial to examine how these communities have been engaged in the public participation process to ensure their voices are heard and their concerns are adequately addressed. Please provide more information on how the Shared Passenger Track Alternative would mitigate the cumulative impacts of the induced rail freight traffic impacts in north Orange County.
- The analysis in the SAA fails to demonstrate how it would mitigate potential impacts to the shared use agreement between BNSF, OCTA, and the Riverside County Transportation Commission, which are part of the San Bernardino Subdivision Shared Use Agreement.

- The SAA document relies on the reduction of HSR passenger service levels and speeds as a mitigation strategy. This appears to conflict with the primary purpose of the project to connect the megaregions of the state through a high-speed rail system.

- The report states that track reconfiguration may be considered at the Fullerton station (to ensure BNSF access and/or to reduce project footprint or costs). The SAA needs to provide more information and details about the impacts of the track reconfiguration to Fullerton Station and the assumed plans for using the existing tracks at that location.

- The SAA relies on additional staging tracks outside the project corridor (considered freight rail mitigation). CHSRA must better analyze the viability and impacts of the staging tracks before selecting the Shared Passenger Track Alternative as the preferred alternative.

- CHSRA reports identify the potential for shared maintenance costs with other passenger rail services as a feature of the Shared Passenger Track Alternative. OCTA must review the information that supports this statement and is concerned with the implications of this concept on the maintenance cost shares of the other rail operators.

- CHSRA has not provided the modeling assumptions for the Shared Passenger Track Alternative. This information will assist OCTA to better assess:
  - Assumed operating speeds in relation to the project's legislative intent;
  - Freight utilization and maintaining capacity for future increases in Metrolink and Surfliner passenger service levels;
  - Impacts to Metrolink's Southern California Optimized Rail Expansion (SCORE) Program implementation; and
  - The effects of electrification on OCTA-owned tracks and the impact on intracounty commuter rail service between Fullerton and south Orange County.

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

September 24, 2020

Mr. Mark McLoughlin
Attn: Los Angeles-Anaheim
California High-Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: **Revised Notice of Preparation and Notice of Intent for the Environmental Impact Report/Statement for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project**

Dear Mr. McLoughlin:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Revised Notice of Preparation (NOP) under the California Environmental Quality Act (CEQA) and Notice of Intent (NOI) under the National Environmental Policy Act (NEPA) for the Environmental Impact Report/Statement (EIR/EIS) for the Los Angeles (Union Station) to Anaheim (Anaheim Regional Transportation Intermodal Center) Project Section (Project) of the California High-Speed Rail Authority (CHSRA) Project. OCTA is a joint powers authority (JPA) member of the Southern California Regional Rail Authority (SCRRA), operated by Metrolink. The Project's intent to provide high-speed intrastate ground transportation should not negatively affect local and intercounty rail services such as Metrolink that serve approximately 2.9 million (fiscal year 2019) trips annually. The following comments are provided for your consideration:

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- OCTA is formally requesting to be added to the notification and distribution lists for all CEQA notices, public meeting notices, and public meeting/hearing notices relating to the Los Angeles to Anaheim segment of the Project under CEQA and local and state law, including the Ralph M. Brown Act and the Bagley-Keene Act.
- As a JPA member, OCTA is also partnering with Metrolink to implement the Southern California Optimized Rail Expansion Program. The CHSRA EIR/EIS must assess any potential impacts to these planned improvements.
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- Incremental freight rail impacts - The proposed Colton Facility is anticipated to accommodate added freight trains from the Los Angeles/Long Beach ports

to Colton, which could increase over time. The added BNSF freight traffic would likely be travelling through the communities of Buena Park, Fullerton, Anaheim, Placentia, and Yorba Linda. OCTA recently completed a $650 million program consisting of seven grade separation projects that was partially necessitated to address the increase in freight movement related to the expansion of the Los Angeles/Long Beach ports. The EIR/EIS should thoroughly disclose, assess, and address any of the environmental impacts related to operation/queuing of additional freight trains through Orange County.

- Truck traffic – as noted by CHSRA, the purpose of the revised NOP/NOI was to solicit input on additional project components that would be required in Colton and Lenwood, which were not included when the project was initially scoped in 2007. The EIR/EIS should address the environmental effects of any potential for the shift from freight to truck traffic in Orange County that may be necessary to support the Project. It is not clear how existing truck freight traffic in Orange County would be affected as a result of the proposed changes to freight rail operations. Environmental impacts of any associated truck traffic movements shift should be studied and addressed.
- Throughout the construction of the Project, Metrolink will be expected to continue to provide uninterrupted service. Any impacts to Metrolink service during the construction or operation of the Project must be assessed and mitigated in the EIR/EIS.

OCTA appreciates the opportunity to provide meaningful input on the revised NOP/NOI scoping process, and we look forward to working with the CHSRA to integrate the aforementioned comments into the EIR/EIS analysis. Furthermore, OCTA looks forward to becoming a more active participant in the development of the EIR/EIS so that any impacts to Orange County will be adequately analyzed addressed and mitigated. OCTA understands our partner agencies, RCTC and the San Bernardino County Transportation Authority, have raised similar concerns regarding the Project. If you have any questions or comments, please contact Kia Mortazavi at (714) 560-5741 or at kmortazavi@octa.net.

Sincerely,



Darrell E. Johnson
Chief Executive Officer

DEJ:dp

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

November 15, 2024

Attn: Simon Tse and Amit Joshi
Los Angeles-Anaheim
California High Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Via email: simon.tse@hsr.ca.gov and amit.joshi@hsr.ca.gov

Subject: Los Angeles to Anaheim Section Updated Preliminary Engineering for Project Definition

Dear Mr. Tse and Mr. Joshi,

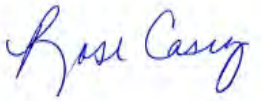
On October 7, 2024, the California High Speed Rail Authority (CHSRA) provided the Orange County Transportation Authority (OCTA) with the updated Preliminary Engineering for Project Definition (PEPD) documents. OCTA is a Joint Powers Authority member of the Southern California Regional Rail Authority, operated by Metrolink. OCTA previously provided comments on the Supplemental Alternatives Analysis, the Revised Notice of Preparation (NOP), and the Notice of Intent (NOI) for the Environmental Impact Report/Statement (for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project (see attached September 24, 2020, and January 22, 2024 letters). In addition, OCTA has reviewed the PEPD; see below for a summary of our comments. See Attachment A for more details.

- The Fullerton train station is the busiest passenger rail station in Orange County. OCTA would like to better understand how the station would be modified and addressed in the Draft Environmental Impact Report/Statement.
- Various XO (crossover) configurations appear to limit operational flexibility for Metrolink trains. OCTA requests further coordination with Metrolink to minimize potential impacts.
- Please confirm that Metrolink minimum clearance requirements will be met for the shared track concepts.
- Several concepts involve the demolition of existing railroad bridges and modifications of grade separations, such as those located at Beach Boulevard, Brea Creek, Dale Street, Gilbert Street, and Harbor Boulevard. Clarification is needed on provisions for temporary parapets or other measures to retain the California Public Utility Commission walkway during construction. Additionally, construction phasing should be considered to minimize impacts to passenger rail operations.
- Discuss and negotiate with OCTA on the shared use and right of way impacts south of Fullerton Junction to Anaheim Regional Transportation Intermodal Center (ARTIC) station.

- Evaluate the Fullerton Station passenger path of travel from the amenities on the north side of the station to the new proposed platform on the south side to compare the additional time and distance burden on the passengers, if any.
- Coordination should be conducted for the ARTIC site plan, as needed, with ongoing final design efforts by the City of Anaheim for the "Building Bridges to Transit" project which includes new active transportation connections, pedestrian bridges, and riverbank trail realignment.

OCTA appreciates the opportunity to provide meaningful input, and we look forward to working with the CHSRA to address the aforementioned comments. Furthermore, OCTA looks forward to continuing to be an active participant in the development of the Los Angeles to Anaheim updated PEPD so that any impacts to Orange County will be adequately analyzed, addressed, and mitigated. If you have any questions or comments, please contact me at 714-560-5729 or rcasey@octa.net or Dan Phu at 714-560-5907 or dphu@octa.net.

Sincerely,



Rose Casey
Planning, Executive Director

Attachments: Attachment A: PEPD Comments
Attachment B: Revised NOP and NOI for the EIR/EIS for the Los Angeles to Anaheim Project Section of the CHSRA Project dated September 24, 2020
Attachment C: Los Angeles to Anaheim Project Section Supplemental Alternative Analysis Report dated January 22, 2024

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
1	R. Vandenberg	Rheia Consulting				Transmittal Letter	NA	Preferred alternative does not include HSR Station at Fullerton. How will HSR Fullerton Station and Modified Metrolink Fullerton Station be addressed in the DEIS/DEIR?				
PEDP VOLUME 3.1												
2	A. Shah	HDR Engineering		X		GE-D0101	General	Suggest having sheet after symbols because it is unclear what the blue linework is				
3	A. Shah	HDR Engineering		X		GE-B0101	General	Metrolink design criteria requires 15' minimum track spacing. Need to review and file RFSDCs for where Metrolink commuter tracks are shown with reduced track spacing.				
4	A. Shah	HDR Engineering		X		GE-B0101	General	Max design speed for this corridor is 110mph				
5	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	Fullerton Junction - viability of overall configuration needs to be confirmed with simulations that incorporate future Metrolink service plans for OC, IEOC, and Riverside Lines, allowing for normal variations in train operations				
6	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	Certain XO configurations appear to limit operational flexibility for Metrolink trains, including: • No XO are provided on the north side of the Relocated Metrolink Commerce Station • XO configuration south of Relocated Buena Park Station • At CP Santa Fe Springs (MP 155.0), SB operation on M3 (if required) does not have access to the west Norwalk/Santa Fe Springs Metrolink Station platform • 2 LH XO rather than universal configuration north of Fullerton Station • CP Orangethorpe (MP 166.2) includes 2 LH crossovers rather than universal configuration				
7	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	26th St LMF yard lead configuration could affect shared passenger track operations as: • NB access into 26th St LMF would require NB HSR trains to operate on M4 from CP Bandini (MP 148.9) to the LMF lead (approx MP 146) • NB access out of the 26th St LMF would require NB HSR trains to operate on M4 from the LMF lead (approx MP 144.5) to CP Olympic, north of the Redondo Jcn Flyover.				
8	R. Vandenberg	Rheia Consulting		X		TT-D3001	Track Alignment	In Section C-C, please demonstrate that proposed 10' horizontal clearance between M1 track and OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
9	R. Vandenberg	Rheia Consulting		X		TT-D3003	Track Alignment	How will ROW access be controlled at industry sidings?				
10	R. Vandenberg	Rheia Consulting		X		TT-B3001, TT-D3005, TT-D3006, TT-D3015, TT-D3016, TT-D3029. TT-D3030, TT-D3031	Track Alignment	On aerial structure, please demonstrate that proposed min. 10.67' horizontal clearance to OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
11	R. Vandenberg	Rheia Consulting		X		TT-D3008	Track Alignment	Section L-L: identify which station this is (Commerce Station)				
12	R. Vandenberg	Rheia Consulting		X		TT-D3011	Track Alignment	Section R-R at 605 Fwy: please clarify what 10' horizontal clearance is to… if to bridge pier, demonstrate that there is adequate clearance for pier protection that will be required for Caltrans structure				
13	R. Vandenberg	Rheia Consulting		X		TT-D3023	Track Alignment	At retained fill sections through Buena Park, can east (left) walkway be moved outside OCS poles (like at west/right)?				
14	A. Shah	HDR Engineering		X		TT-D3027	Track Alignment	Need a dimension to the intertrack fence from the CL of track				
15	R. Vandenberg	Rheia Consulting		X		TT-D3028	Track Alignment	Section NN-NN at Fullerton Jct: please explain clearance between BNSF M3 and SCRRA MT1 which is shown as 0' to 108'. Where 0', is this a shared track?				
16	R. Vandenberg	Rheia Consulting		X		TT-D1503, TT-D1603	Track Alignment	It would be useful to show in Plan and Profile sheets which tracks are intended solely for passenger train operations, which tracks are dedicated for freight use, and which tracks would support shared passenger / freight operations.				

COMMENT-RESPONSE LOG

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17	G. Jennings	Mott MacDonald		X		TT-D1581	Track Alignment	NW end of new station platforms have horizontal/vertical curvature for New Metrolink Buena Park Station. Depending on train stopping positions, the risk to platform train interface (PTI) could be minimal but is there opportunity to remove curvature for a new station and de-risk construction and PTI? Note the platform location is not shown on the profile which would aid understanding (platforms are identified in other drawings)				
18	G. Jennings	Mott MacDonald		X		TT-D1584, TT-D1592, TT-D1621, TT-D1622	Track Alignment	There are a number of turnout/crossover units in a complex arrangement which are located on (or are in close proximity) to the underpasses. This imparts a risk in terms of differential track stiffness (due to the stiff bridge structure) for operationally critical assets with impacts on maintenance and the risk/consequence of derailment. How has the risk been considered/assessed/mitigated, as additonal landtake may be required to relocate the complex turnout/crossover units? Also relates to grade separation drawings ST-K1271, ST-K3301, ST-K1571 in volume 3.3 and drawing B-1 in volume 3.3A				
19	G. Jennings	Mott MacDonald		X		TT-D1599	Track Alignment	No.11 and No. 20 Turnout are located in close proximity to the Fullerton station platform ends. Noted that train control systems are not part of this contract but this distance may be a challenge for signal standback and overlaps, has this be considered?				
20	A. Shah	HDR Engineering		X		TT-D1599	Track Alignment	Will the existing ped bridge be protected in place or removed?				
21	R. Vandenberg	Rheia Consulting		X		TT-D1619	Track Alignment	Operational implications of shared use of proposed HST overnight storage lead with UPRR local freight movement needs to be better understood (connection to UP Tustin Branch)				
22	R. Vandenberg	Rheia Consulting		X		TT-D1604	Track Alignment	100-ft min. is required between #20 TO PS and Orangethorpe Ave GC				
23	R. Vandenberg	Rheia Consulting		X		TT-D1604	Track Alignment	Show PS to existing Metrolink storage track south of Orangethorpe Ave				
24	J. Lee	OCTA		X		General	Track Alignment	OCS poles shown throughout the plans will reduce the overall usable ROW for OCTA and the ability for expansion in the future				
25	J. Lee	OCTA		X		General	ROW	The dedicated HSR storage tracks proposed will occupy most of OCTA's ROW and prevent the owner from future service expansion and other uses				
26	J. Lee	OCTA		X		General	ROW	Use of OCTA's ROW for HSR as shared use including new improvements should be discussed and agreed upon				
27	J. Lee	OCTA		X		General	ROW	ROW discussions and negotiations between HSR and BNSF only apply to the corridor north of Fullerton Junction; need to add a note to discuss and negotiate with OCTA on the corridor south of Fullerton Junction to ARTIC Station				
28	I. Watkins	Mott MacDonald		X		RW-M1598-1560	ROW	Note that agreements will be required for rail and public ROW area adjustments around modified Metrolink Fullerton Station with OCTA. Who will be the lead agency for such agreements?				
29	I. Watkins	Mott MacDonald		X		RW-M1598-1623	ROW	Note that agreements will be required for rail ROW area adjustments around proposed HSR Anaheim Station with OCTA. Who will be the lead agency or such agreements?				
PEDP VOLUME 3.3												
30	A. Evans	Mott MacDonald		X		CV-T0266	Grade Sep	The new alignment near Buena Park Station will move HSR lines closer to residential properties to the south. What mitigation is anticipated in terms of acoustic treatment and/or potential purchase of some of the properties to provide credible offset between residents and the rail corridor?				
31	R. Vandenberg	Rheia Consulting		X		CV-T1267, CV-T1271, CV-T1302	Grade Sep	Beach Blvd / Dale St / Commonwealth Ave grade separation - min. vertical clearance for roadway below RR bridge matches existing (15.5 ft) but would be reduced by falsework during construction. What would vertical clearance be during construction?				
32	R. Vandenberg	Rheia Consulting		X		ST-K1266	Grade Sep	Buena Park Station Platform extends onto Beach Blvd grade separation structure - how will emergency egress be achieved?				

OCTA

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33	R. Vandenberg	Rheia Consulting		X		ST-K3266	Grade Sep	Proposed construction at Beach Blvd grade separation requires demolition of existing bridge parapet wall adjacent to track M1. This would need to be accomplished while maintaining existing M1 track in place until new M1 alignment is constructed to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
34	R. Vandenberg	Rheia Consulting		X		ST-K1269	Grade Sep	Proposed construction at Break Creek requires demolition of existing bridge parapet wall and raised walkway adjacent to track M3. This would need to be accomplished while maintaining existing M3 track in service to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
35	R. Vandenberg	Rheia Consulting		X		ST-K1271	Grade Sep	Proposed construction at Dale St grade separation requires demolition of existing bridge parapet and walkway adjacent to M1 (LA-A SB). This would need to be accomplished while maintaining existing LA-A SB track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
36	R. Vandenberg	Rheia Consulting		X		CV-T3281	Grade Sep	What intrusion protection or other measures are being taken to avoid people/objects getting into trench section adjacent to Artesia Ave?				
37	R. Vandenberg	Rheia Consulting		X		ST-K1291	Grade Sep	Proposed construction at Gilbert St grade separation requires demolition of existing bridge parapet and walkway adjacent to M4. This would need to be accomplished while maintaining existing track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
38	R. Vandenberg	Rheia Consulting		X		ST-K1291, ST-K1541	Grade Sep	Is 2' clearance sufficient for seismic interactions between two RR bridges? Provide relevant codes.				
39	R. Vandenberg	Rheia Consulting		X		ST-K3301	Grade Sep	Commonwealth Ave Section B and Section E - verify no ballast retainer is needed between M3 and LA-A NB due to difference in profile elevation				
40	R. Vandenberg	Rheia Consulting		X		ST-K1311	Grade Sep	Proposed construction at Euclid St requires demolition of existing single-track RR bridge to allow for construction of new 2 track shared bridge. While 5 tracks still available during construction, some of these are used by BNSF for storage. Storage of trains should be precluded during construction to minimize impacts to passenger train operations				
41	R. Vandenberg	Rheia Consulting		X		CV-T1322	Grade Sep	Walnut Ave grade separation proposes 15.67 ft min clearance. Point of measurement in cross section is at roadway crown, clearance at corner of RR bridge soffit should be verified/shown on drawing				
42	R. Vandenberg	Rheia Consulting		X		CV-T1351	Grade Sep	Highland Ave grade separation - min. 15.67 ft clearance matches existing but will be reduced by falsework during construction				
43	R. Vandenberg	Rheia Consulting		X		ST-K1361	Grade Sep	Proposed construction at Harbor Blvd grade separation requires removal of existing bridge fence/barrier next to existing m3 track and walkway next to existing m1 track. Provisions for temporary parapet or other measures to retain CPUC walkway during construction?				
44	R. Vandenberg	Rheia Consulting		X		ST-K1361	Grade Sep	Harbor Blvd grade separation typical section -- is HSR platform cantilevered over existing structure? What is interaction between two bridges?				
45	R. Vandenberg	Rheia Consulting		X		ST-K1571, ST-K1572	Grade Sep	Proposed construction Katella Ave requires construction of half of new RR bridge, demolition of existing RR bridge, then construction of second half of new RR bridge. Verify constructability and clearances between first half of new RR bridge and existing RR bridge. First half of new RR bridge would need to be able to support operation of two tracks but current construction staging concept only provides 6'10" horizontal clearance between M2 and temporary parapet wall.				
46	R. Vandenberg	Rheia Consulting		X		CV-T1583	Grade Sep	Douglass Service Rd proposes 13' minimum clearance under new RR bridge. Does that agree with Metrolink standards?				

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47	R. Vandenberg	Rheia Consulting		X		ST-K1582	Grade Sep	Please check vertical clearance labels and notes				
48	J. Lee	OCTA		X		General	Grade Sep	Construction phasing should be considered for grade separations to maintain full passenger operations during construction and minimize service disruptions				
PEDP VOLUME 3.4												
49	G. Jennings			X		UT-C1585, UT-C1597, UT-C1604, UT-C1621	Utilities	Utilities in close proximity to turnouts/crossovers. Potential for differential track stiffness leading to dynamic forces, voiding and subsequent component failures; and therefore to increased maintenance activity. Risk may be mitigated by utility depth (not indicated on plan) but how has the risk been considered/assessed/mitigated, as additional landtake may be required to relocate the turnout/crossover units?				
50	A. Shah	HDR Engineering		X		UT-C1599	Utilities	Need to detail with retaining wall				
51	J. Lee	OCTA		X		General	Utilities	Utilities under license proposed to be relocated should include relocation costs and potential ROW needed if relocation cannot stay within OCTA's ROW				
52	J. Lee	OCTA		X		General	Utilities	Confirm utility impacts from grade separations are also defined within the utility plans				
53	A. Evans	Mott MacDonald		X		UT-C1599	Utilities	Note largest utility for coordination is City of Fullerton 36" Storm Drain which will need asset protection during the works but not necessarily diversion. Provide guidance on how this line will be protected?				
PEDP VOLUME 3.5												
54	R. Vandenberg	Rheia Consulting		X		AR-B0201	Stations	Commerce Station - proposed orientation of Metrolink platform and station plaza/parking creates a long path of travel for Metrolink riders, with platform accessible only from one end. This does not seem to meet the standard. Metrolink criteria calls for access to be provided at the center of the platform or as close as possible to mini-high platform. Explain how HSR will meet the standard and what the provisions are for emergency egress from the far end of the platform.				
55	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Proposed relocation of Buena Park Station will include a 680' platform with accessible entrance to the transit plaza (via. pedestrian tunnel) and Beach Bvd (via. stair and lift). What ammenities will be provided at this relocated station similar to those provided at the existing Buena Park Station (including number of parking stalls, transit plaza, etc.)?				
56	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	What phase of construction will the entrance to Beach Blvd. be completed as part of the station relocation? This entrance would be complex to retrofit once the station is operational.				
57	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details for potential pedestrian connection to Tulare Street. What phase of construction will the underpass be completed as a part of the station relocation? This element would be complex to retrofit once the station is operational.				
58	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details how staging of works between relocated station and existing station will be arranged to minimize disruption to the public across all transit modes. Details of staging for Metrolink operations, OCTA Buses and transit plaza amenities etc. to be agreed.				
59	J. Lee	OCTA		X		AR-B0601	Stations	With a planned year of construction, the parking capacity needs to be increased to accommodate the service improvements with the station relocation				
60	R. Vandenberg	Rheia Consulting		X		AR-B0601	Stations	What are provisions for emergency egress from south end of Buena Park station platform at Beach Blvd grade separation?				
61	R. Vandenberg	Rheia Consulting		X		AR-B0701	Stations	Offset of two Metrolink platforms creates a very long path of travel for SB Metrolink/Amtrak riders. More direct access should be provided between parking structure and SB platform.				
62	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will there be any connection from the parking structure to the Amtrak/Metrolink center platform? What is the ped routing from the parking structure?				

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63	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will passenger trains be on the BNSF Main Tracks to be able to utilize the existing platform?				
64	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will any of the existing station parking lot on the south side of the station be salvaged?				
65	J. Lee	OCTA		X		AR-B0701	Stations	How will the enhanced sidewalk be accessed from Walnut? It appears there is a retaining wall along Walnut to support the track structure				
66	J. Lee	OCTA		X		AR-B0701	Stations	Loss of station and street parking with direct access from Walnut should be mitigated				
67	J. Lee	OCTA		X		AR-B0701	Stations	Should evaluate the passenger path of travel from the amenities on the north side to the new platform for added time and degradation of convenience. Mitigate as needed.				
	J. Lee	OCTA		X		AR-B0701	Stations	The new platform length should accommodate both future Amtrak and Metrolink services				
68	A. Shah	HDR Engineering		X		AR-B0701	Stations	What are the exit points off of the center platform? Need to consider NFPA 130				
69	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Realignment to Fullerton Station configuration and termination of existing lines get connected through the new proposed 800' station length will require reconfiguration of Walnut Ave also required. Provide details of how this will be addressed.				
70	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Enhancing the interface with the TOD neighborhood area, is there any consideration for additional infrastructure (e.g. parking) for increased ridership as a consequence of High Speed? What improvements and parking encroaches partially in OTCA land will require purchase from other land owners?				
71	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Changes to overpass bridge for passengers to an underpass will require works during track realignment phase. How will HSR ensure existing service will be protected during construction works?				
72	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Note large new bridging structures required over Harbor Rd. to support track and new platform.				
73	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Anticipate that loss of parking for current revenue service will be required to support construction site in the temporary case. How will HSR mitigate this issue?				
74	A. Evans	Mott MacDonald		X		AR-Y9901	Stations	Note, all minimum public areas are met through proposed design for HSR requirements. However, it is unclear whether this includes interchange and/or increased ridership from Metrolink passengers as a consequence of the scheme, i.e. Will HSR improve current platform space/ticketing/amenties for the Metrolink ridership?				
75	A. Evans	Mott MacDonald		X		AR-Y9903	Stations	Parking set at 608 spaces. Is this current or forecasted to what year? Also, is there any consideration for increased ridership as a consequence of the interchange?				
76	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Clarity required on pedestrian modelling for pedestrian link between existing Artic Station, new HSR/Metrolink/Amtrak parking structure and HSR Station facility. How will HSR ensure sufficient space to allow anticipated cross movements between assets?				
77	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Proposed HSR alignment will require additional land purchase from adjacent stakeholders most noteably Angel Stadium. While consideration has been made to HSR drop off zone and assocaited road works, the environmental footprint terminates at North West corner of the site. What other road improvements are expected in order to complete the connection to E Katella Ave? Will HSR cover the cost for land acquisition?				
78	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New HSR platform will require extensive works over Douglass Road and beneath the Orange Fwy 57. Provide explanation for how removal of ~15No support columns can be achieved whilst also maintaining the operation of the Fwy. Any additional bracing structure would likely reduce headrooms beneath the Fwy to both the HSR platforms and potentially existing Metrolink/Amtrak platform.				

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79	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Creation of new platform (including new bridge over Douglass Rd) will likely have impact on existing Metrolink / Amtrak infrastructure. Can HSR provide asset protection to ensure stability of line? If so, how? If not, any loss of revenue until reinstatement of existing infrastructure must be compensated.				
80	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Scheme appears to show curtailment of existing Metrolink/Amtrak platform. Provide possible mitigation efforts for potential impact on services based on this proposal.				
81	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Extended pedestrain undercrossings to serve HSR platform. The proposal offers new elevator access which is seen as a benefit, but also requires new access ramps to be integrated within existing platform width. How will this impact the remaining width of the platforms to ensure safe operational width? Note that during construction this will likely also limit the available length of platform for passengers.				
82	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New Station location will sever existing at grade access to Metrolink/Amtrak platforms (via stairs/ramps) from the south. How will HSR mitigate length of passenger travel routes to reach the new HSR platforms?				
83	A. Evans	Mott MacDonald		X		AR-B0901, AR-C1901	Stations	How will existing underpass between Artic bus terminal site for new station south of tracks be maintained to avoid excessive passenger travel routes for interchange?				
84	R. Vandenberg	Rheia Consulting		X		AR-B0901, AR-C1901, AR-J8901, AR-J8903	Stations	Coordinate ARTIC site plan as needed with ongoing final design efforts by City of Anaheim for "Building Bridges to Transit" project that includes new active transportation connections, ped bridges, and riverbank trail realignment. These ongoing improvements are not reflected in these drawings.				
PEDP VOLUME 3.6												
85	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	What options other than the track alignment and ROW Impact have been considered? Provide details of those options and scoring criteria if implemented for review.				
86	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	It is assumed that a new station entrance will be provided on to Highland Avenue if the Fullerton Station option is implemented. Provide details of secondary means of escape to the west (if required for fire egress). Also provide details of interchange between Metrolink and the proposed HSR station option.				
87	R. Vandenberg	Rheia Consulting		X		AR-B0701A	Stations	Site plan for "unpreferred" alternative at Fullerton Station includes new ped bridge from existing parking structure that improves access to SB Metrolink/Amtrak station as compared to the preferred site plan.				

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

September 24, 2020

Mr. Mark McLoughlin
Attn: Los Angeles-Anaheim
California High-Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: **Revised Notice of Preparation and Notice of Intent for the Environmental Impact Report/Statement for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project**

Dear Mr. McLoughlin:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Revised Notice of Preparation (NOP) under the California Environmental Quality Act (CEQA) and Notice of Intent (NOI) under the National Environmental Policy Act (NEPA) for the Environmental Impact Report/Statement (EIR/EIS) for the Los Angeles (Union Station) to Anaheim (Anaheim Regional Transportation Intermodal Center) Project Section (Project) of the California High-Speed Rail Authority (CHSRA) Project. OCTA is a joint powers authority (JPA) member of the Southern California Regional Rail Authority (SCRRA), operated by Metrolink. The Project's intent to provide high-speed intrastate ground transportation should not negatively affect local and intercounty rail services such as Metrolink that serve approximately 2.9 million (fiscal year 2019) trips annually. The following comments are provided for your consideration:

- Current passenger rail services - OCTA retains certain rights over the Burlington Northern Santa Fe (BNSF) corridor in the Fullerton to Los Angeles section. These rights enable OCTA to sponsor critical commuter rail service between Orange County and Los Angeles. The ability to fully retain and realize these rights is crucial as any impairment could result in reduced commuter rail service, diverting trips to highways, and result in increases in highway traffic and vehicle miles traveled with associated negative environmental impacts. Furthermore, the rights and related commuter rail services are critical elements of a multimodal expenditure plan funded by the local sales tax measure. Regionally, the ability to continue to offer balanced multimodal solutions is a critical element of the OCTA Long-Range Transportation Plan. The EIR/EIS should thoroughly evaluate and address these issues and acknowledge OCTA's ownership of the railroad right-of-way between Fullerton and Anaheim, which was acquired for the purposes of providing expanded Metrolink service. These property rights and our objectives should not be undermined as a result of the Project.

- OCTA previously provided comments on the preliminary engineering for project definition for the CHSRA Los Angeles to Anaheim segment. Although CHSRA provided responses to OCTA's comments, we look forward to a mutually satisfactory resolution to the concerns previously raised by OCTA.
- In addition, BNSF, OCTA, and the Riverside County Transportation Commission (RCTC) are part of the San Bernardino Subdivision Shared-Use Agreement (SUA), which generally grants OCTA and RCTC exclusive rights for "passenger transportation uses." Any third party wishing to utilize the segment between Redondo Junction and Fullerton must obtain approval from OCTA and RCTC in addition to BNSF. A memorandum of understanding between CHSRA and BNSF does not supersede the terms of the SUA. Any impacts to the SUA must be thoroughly analyzed in the EIR/EIS.
- OCTA is a "responsible agency" under CEQA and a "cooperating agency" under NEPA for the Project. OCTA owns the railroad right-of-way between south of Fullerton to the Orange/San Diego county line, is a JPA member of SCRRA, as well as a party to the SUA. Accordingly, OCTA must be designated as a responsible agency and cooperating agency under CEQA and NEPA, respectively.
- OCTA is formally requesting to be added to the notification and distribution lists for all CEQA notices, public meeting notices, and public meeting/hearing notices relating to the Los Angeles to Anaheim segment of the Project under CEQA and local and state law, including the Ralph M. Brown Act and the Bagley-Keene Act.
- As a JPA member, OCTA is also partnering with Metrolink to implement the Southern California Optimized Rail Expansion Program. The CHSRA EIR/EIS must assess any potential impacts to these planned improvements.
- Future passenger rail capacity - OCTA has made significant investments including the purchase of right-of-way for capacity, track and rail communication enhancements, turnaround facilities, stations, and rolling stock to allow OCTA to offer up to 76 daily Metrolink trains in Orange County. OCTA and Metrolink have invested heavily on a future Metrolink Placentia Station that has been environmentally cleared and ready to be constructed.
- In addition, OCTA has supported publicly-funded triple track improvements and grade separations beyond the Orange/Los Angeles county line that enable the future expansion capacity to be realized. The EIR/EIS should assess the environmental impacts of any compromises to OCTA's ability to offer this level of service. Lastly, the EIR/EIS should clarify that the reliability of Metrolink operations in the Fullerton to Los Angeles segment will not be negatively affected by any added burdens on the constrained shared passenger and freight corridor.
- Incremental freight rail impacts - The proposed Colton Facility is anticipated to accommodate added freight trains from the Los Angeles/Long Beach ports

to Colton, which could increase over time. The added BNSF freight traffic would likely be travelling through the communities of Buena Park, Fullerton, Anaheim, Placentia, and Yorba Linda. OCTA recently completed a $650 million program consisting of seven grade separation projects that was partially necessitated to address the increase in freight movement related to the expansion of the Los Angeles/Long Beach ports. The EIR/EIS should thoroughly disclose, assess, and address any of the environmental impacts related to operation/queuing of additional freight trains through Orange County.

- Truck traffic – as noted by CHSRA, the purpose of the revised NOP/NOI was to solicit input on additional project components that would be required in Colton and Lenwood, which were not included when the project was initially scoped in 2007. The EIR/EIS should address the environmental effects of any potential for the shift from freight to truck traffic in Orange County that may be necessary to support the Project. It is not clear how existing truck freight traffic in Orange County would be affected as a result of the proposed changes to freight rail operations. Environmental impacts of any associated truck traffic movements shift should be studied and addressed.
- Throughout the construction of the Project, Metrolink will be expected to continue to provide uninterrupted service. Any impacts to Metrolink service during the construction or operation of the Project must be assessed and mitigated in the EIR/EIS.

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Sincerely,



Darrell E. Johnson
Chief Executive Officer

DEJ:dp

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

January 22, 2024

Ms. LaDonna DiCamillo
Southern California Regional Director
California High Speed Rail Authority
Attn: Los Angeles-Anaheim
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: **Los Angeles to Anaheim Project Section Supplemental Alternatives Analysis Report**

Dear Ms. DiCamillo:

The California High Speed Rail Authority (CHSRA) recently released the Los Angeles to Anaheim Project Section Supplemental Alternatives Analysis (SAA) Report proposing the Shared Passenger Track Alternative without sufficient consultation with the Orange County Transportation Authority (OCTA). OCTA, as the railroad owner and County Transportation Commission, has several concerns with the lack of coordination, the adequacy of the analysis, and inconsistent justifications used to support this alternative as described below.

- OCTA was not adequately consulted on the development of the Shared Passenger Track Alternative despite being Orange County's transportation planning agency and railroad owner.
- The Shared Passenger Track Alternative does not offer high-speed service, conflicting with legislative requirements. Compared to other alternatives, relying on reduced speeds and service levels contradicts the purpose of high-speed rail connectivity.
- Given the proximity of the Shared Passenger Track Alternative to disadvantaged communities, potential community and environmental impacts require more analysis. Changes in freight operations to accommodate the proposed alternative suggest consideration of cumulative impacts with emphasis on sensitive communities.
- Implications of the proposal on existing shared track agreements and current and planned passenger rails services must be more clearly analyzed and described.
- More detail is needed on the Buena Park station relocation, track reconfiguration, staging tracks, shared maintenance costs, and modeling assumptions.
- CHSRA appears to have delegated the Fullerton station improvements to the Southern California Regional Rail Authority (SCRRA) as part of the

Fullerton Interlocker Project that is currently led by SCRRA. The proposed changes require more discussion so impacts to current passenger rail services due to relocation of the platform can be better understood by OCTA and the City of Fullerton.

Please refer to the attachments for more details on OCTA's primary concerns. OCTA requests involvement as an active participant in developing alternatives. This will ensure that impacts to Orange County are fully analyzed and addressed. We look forward to meeting with you to discuss the rationale for the Shared Passenger Track Alternative and rejection of the other alternatives. Please contact me at (714) 560-5741 or kmortazavi@octa.net for follow-up. Thank you.

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The stated reasons for eliminating the Freeway Tunnel and the Union Pacific Railroad alternatives include cost, construction challenges, and short-term construction impacts related to tunneling. Cost should not be a factor to eliminate an alternative under the California Environmental Quality Act (CEQA) process. The purpose of CEQA analysis is to assess the potential environmental impacts. In this respect, the short-term and long-term environmental impacts of the Shared Passenger Track Alternative should be given equal consideration prior to any decision on a preferred alternative.

- Given the proximity of the Shared Passenger Track Alternative to disadvantaged communities, potential community and environmental impacts require more analysis. Without the proper community impacts assessment and environmental justice, and related Title VI analyses, the introduction and elimination of alternatives would not meet the spirit and intent of the CEQA public disclosure process. Furthermore, implementing the Shared Passenger Track Alternative has the potential to induce additional rail freight traffic as stated in the Supplemental Alternatives Analysis (SAA). This raises important questions about potential cumulative environmental, health, and community impacts, particularly to disadvantaged communities. Consequently, it is crucial to examine how these communities have been engaged in the public participation process to ensure their voices are heard and their concerns are adequately addressed. Please provide more information on how the Shared Passenger Track Alternative would mitigate the cumulative impacts of the induced rail freight traffic impacts in north Orange County.
- The analysis in the SAA fails to demonstrate how it would mitigate potential impacts to the shared use agreement between BNSF, OCTA, and the Riverside County Transportation Commission, which are part of the San Bernardino Subdivision Shared Use Agreement.

- The SAA document relies on the reduction of HSR passenger service levels and speeds as a mitigation strategy. This appears to conflict with the primary purpose of the project to connect the megaregions of the state through a high-speed rail system.

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  - Assumed operating speeds in relation to the project's legislative intent;
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AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

September 24, 2020

Mr. Mark McLoughlin
Attn: Los Angeles-Anaheim
California High-Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: **Revised Notice of Preparation and Notice of Intent for the Environmental Impact Report/Statement for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project**

Dear Mr. McLoughlin:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Revised Notice of Preparation (NOP) under the California Environmental Quality Act (CEQA) and Notice of Intent (NOI) under the National Environmental Policy Act (NEPA) for the Environmental Impact Report/Statement (EIR/EIS) for the Los Angeles (Union Station) to Anaheim (Anaheim Regional Transportation Intermodal Center) Project Section (Project) of the California High-Speed Rail Authority (CHSRA) Project. OCTA is a joint powers authority (JPA) member of the Southern California Regional Rail Authority (SCRRA), operated by Metrolink. The Project's intent to provide high-speed intrastate ground transportation should not negatively affect local and intercounty rail services such as Metrolink that serve approximately 2.9 million (fiscal year 2019) trips annually. The following comments are provided for your consideration:

- Current passenger rail services - OCTA retains certain rights over the Burlington Northern Santa Fe (BNSF) corridor in the Fullerton to Los Angeles section. These rights enable OCTA to sponsor critical commuter rail service between Orange County and Los Angeles. The ability to fully retain and realize these rights is crucial as any impairment could result in reduced commuter rail service, diverting trips to highways, and result in increases in highway traffic and vehicle miles traveled with associated negative environmental impacts. Furthermore, the rights and related commuter rail services are critical elements of a multimodal expenditure plan funded by the local sales tax measure. Regionally, the ability to continue to offer balanced multimodal solutions is a critical element of the OCTA Long-Range Transportation Plan. The EIR/EIS should thoroughly evaluate and address these issues and acknowledge OCTA's ownership of the railroad right-of-way between Fullerton and Anaheim, which was acquired for the purposes of providing expanded Metrolink service. These property rights and our objectives should not be undermined as a result of the Project.

- OCTA previously provided comments on the preliminary engineering for project definition for the CHSRA Los Angeles to Anaheim segment. Although CHSRA provided responses to OCTA's comments, we look forward to a mutually satisfactory resolution to the concerns previously raised by OCTA.
- In addition, BNSF, OCTA, and the Riverside County Transportation Commission (RCTC) are part of the San Bernardino Subdivision Shared-Use Agreement (SUA), which generally grants OCTA and RCTC exclusive rights for "passenger transportation uses." Any third party wishing to utilize the segment between Redondo Junction and Fullerton must obtain approval from OCTA and RCTC in addition to BNSF. A memorandum of understanding between CHSRA and BNSF does not supersede the terms of the SUA. Any impacts to the SUA must be thoroughly analyzed in the EIR/EIS.
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- As a JPA member, OCTA is also partnering with Metrolink to implement the Southern California Optimized Rail Expansion Program. The CHSRA EIR/EIS must assess any potential impacts to these planned improvements.
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January 22, 2024

Ms. LaDonna DiCamillo
Southern California Regional Director
California High Speed Rail Authority
Attn: Los Angeles-Anaheim
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

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OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

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Congestion Management Agency

September 24, 2020

Mr. Mark McLoughlin
Attn: Los Angeles-Anaheim
California High-Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

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- Incremental freight rail impacts - The proposed Colton Facility is anticipated to accommodate added freight trains from the Los Angeles/Long Beach ports

to Colton, which could increase over time. The added BNSF freight traffic would likely be travelling through the communities of Buena Park, Fullerton, Anaheim, Placentia, and Yorba Linda. OCTA recently completed a $650 million program consisting of seven grade separation projects that was partially necessitated to address the increase in freight movement related to the expansion of the Los Angeles/Long Beach ports. The EIR/EIS should thoroughly disclose, assess, and address any of the environmental impacts related to operation/queuing of additional freight trains through Orange County.

- Truck traffic – as noted by CHSRA, the purpose of the revised NOP/NOI was to solicit input on additional project components that would be required in Colton and Lenwood, which were not included when the project was initially scoped in 2007. The EIR/EIS should address the environmental effects of any potential for the shift from freight to truck traffic in Orange County that may be necessary to support the Project. It is not clear how existing truck freight traffic in Orange County would be affected as a result of the proposed changes to freight rail operations. Environmental impacts of any associated truck traffic movements shift should be studied and addressed.
- Throughout the construction of the Project, Metrolink will be expected to continue to provide uninterrupted service. Any impacts to Metrolink service during the construction or operation of the Project must be assessed and mitigated in the EIR/EIS.

OCTA appreciates the opportunity to provide meaningful input on the revised NOP/NOI scoping process, and we look forward to working with the CHSRA to integrate the aforementioned comments into the EIR/EIS analysis. Furthermore, OCTA looks forward to becoming a more active participant in the development of the EIR/EIS so that any impacts to Orange County will be adequately analyzed addressed and mitigated. OCTA understands our partner agencies, RCTC and the San Bernardino County Transportation Authority, have raised similar concerns regarding the Project. If you have any questions or comments, please contact Kia Mortazavi at (714) 560-5741 or at kmortazavi@octa.net.

Sincerely,



Darrell E. Johnson
Chief Executive Officer

DEJ:dp

ATTACHMENT B

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: EIR_EIS
Contract Reference: A4205-F18

Response Codes: A=Agreed and will comply/take action. B=Will investigate. C=Disagree for reasons noted in Response/Status Column. D=Will address in next phase.

REVIEWER RESPONSIBILITY									RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
								This comment matrix is comprised of both new comments specific to the Draft EIR/EIS and the previously issued comments from prior reviews of the Administrative Draft EIR/EIS, PEPD, NOP, and NOI.				
3650	1	E. Smilfi	Mott MacDonald			X	General	Service	The corridor is a critical goods/passenger artery. Coordination with OCTA/SCRRA/LOSSAN/BNSF will be needed to maintains minimum frequencies and time targets for Metrolink and Surfliner during HSR construction. Also, local plans and project related coordination (e.g., Santa Ana Boulevard Underpass, Coastal Rail Resiliency, OC Streetcar) must be continued to ensure compatibility between the construction, service, and future design plans.				
3651	2	E. Smilfi	Mott MacDonald			X	General	Service	Confirm that the Preferred Alternative will not constrain the growth targets or future planning on the Orange County Line.				
3652	3	R. Soto	OCTA			X	General	Operations	Shared Use Agreement Restrictions on Infrastructure Above Track The BNSF San Bernardino Subdivision Shared Use Agreement (SUA) defines Passenger Transportation Uses broadly to include multiple rail modes; however, it explicitly prohibits improvements constructed above the mainline tracks, with only narrow exceptions for two crossings less than 30 feet above rail. The Draft EIR/EIS does not explain how the proposed overhead catenary system (OCS), which constitutes infrastructure above the tracks, complies with this prohibition. The Draft EIR/EIS should clarify how CHSRA intends to reconcile the installation of OCS with the SUA's express limitations and identify the specific agreement amendments, waivers, redefinitions, or other contractual mechanisms that would be required to authorize OCS installation. In addition, the Draft EIR/EIS should clearly identify the corridor segments where such approvals are assumed. Absent this information, the environmental analysis relies on infrastructure that may not be contractually permissible.				
3653	4	R. Soto	OCTA			X	General	Operations	Dispatching Rules and Blended Passenger/Freight Operations The Draft EIR/EIS states that the Shared Passenger Track Alternatives include blended operations and explicitly allow freight trains to operate on passenger rail tracks. However, the SUA limits the circumstances under which dispatching may delay a passenger train to permit freight movement during commuter periods, allowing such delays only in cases of defined "route conflict." The introduction of high-speed rail service would significantly increase the number of passenger train movements competing for dispatching priority. The Draft EIR/EIS does not explain whether CHSRA assumes that existing dispatching rules would be modified, nor does it describe how dispatching priority would be managed among high-speed rail, Metrolink/Amtrak, and freight trains during commuter periods. The Draft EIR/EIS should identify the assumed dispatching framework, clarify whether SUA provisions would be amended, and describe the pathway and timing for resolving these conflicts.				

3654	5	R. Soto	OCTA			X	General	Operations	Electrification and Protection of Freight Service Quality The Draft EIR/EIS references corridor segments where existing tracks would be electrified for shared use, while the SUA repeatedly defines and protects the provision of "quality rail freight service." Even where freight can physically operate adjacent to electrified tracks, the presence of OCS introduces operational and maintenance constraints—such as clearance requirements, outage windows, work restrictions, and incident response limitations—that may materially affect freight reliability. The Draft EIR/EIS does not demonstrate how CHSRA would ensure no material impairment to freight or passenger service expectations protected under the SUA. The Draft EIR/EIS should identify the compatibility standards assumed for electrifying existing tracks, including clearances, maintenance and outage protocols, work windows, incident recovery times, and coordination procedures with freight operators.				
3655	6	R. Soto	OCTA			X	General	Operations	Passenger Train Rights and Operating Slot Assumptions The Draft EIR/EIS assumes up to two high-speed rail trains per hour per direction and states that this level of service is necessary to maintain current and projected freight and passenger rail volumes. However, existing railroad agreements allocate passenger train rights contractually, and the construction of new infrastructure does not automatically confer the right to operate additional trains. The Draft EIR/EIS does not identify whether CHSRA would require new passenger train slots beyond those currently allocated, nor does it disclose the plan, schedule, or risk associated with renegotiating operating rights. Given the complexity and duration of such negotiations historically, the Draft EIR/EIS should identify when and how these discussions would occur and assess the associated implementation risk.				
3656	7	R. Soto	OCTA			X	General	Operations	CHSRA's Contractual Role Under the Shared Use Agreement The SUA defines "Operator" as an entity appointed by the Agency or its assignees to operate Agency Trains and limits that role accordingly. The Draft EIR/EIS appears to presume that CHSRA would automatically qualify as an Agency Party and that high-speed rail service would therefore be included under the definition of Agency Trains. This presumption is not clearly supported by the current SUA language and presents a potential legal and operational mismatch. The Draft EIR/EIS should clarify under what contractual role CHSRA would operate—whether as an Agency Party, an Operator, or a new user requiring an amended or separate shared-use framework—and how that role would be formally established. If CHSRA is not an existing rights-holder, the Draft EIR/EIS must identify the mechanism by which operating rights would be obtained without violating the SUA principle that no rights exist beyond those expressly listed.				
3657	8	R. Soto	OCTA			X	General	Operations	Maintenance and Outage Requirements The Draft EIR/EIS proposes major new systems, including overhead contact systems and traction power, as well as significant station and track reconfigurations. These systems will require routine and emergency maintenance and associated outages. The Draft EIR/EIS does not identify the maintenance or outage windows required by CHSRA, nor does it explain how those windows would align with freight and passenger train priority expectations and commuter-period dispatching rules under the SUA. This information is necessary to evaluate operational impacts and contractual feasibility.				
3658	9	R. Soto	OCTA			X	General	Operations	Dispatching Authority and Cost Allocation The introduction of additional high-speed rail service would increase dispatching complexity and reliance on communications, signal systems, and interlockings, potentially triggering new cost allocation requirements. The Draft EIR/EIS does not disclose whether changes to dispatching authority boundaries are assumed (e.g., between Metro-, BNSF-, or OCTA-dispatched territory), nor does it explain the rationale for any such changes. Additionally, the Draft EIR/EIS does not identify CHSRA's assumed dispatching payment model for high-speed rail operations on shared territory, such as per-train-mile charges, flat fees, or bundled capital costs, or indicate when and how these issues would be resolved.				
3659	10	R. Soto	OCTA			X	General	Operations	Contractual Compliance Versus Infrastructure Capacity The Draft EIR/EIS equates maintaining freight and passenger rail volumes with the ability to schedule those volumes; however, existing agreements impose limits on daily train movements and constrain passenger services beyond the listed rights. Maintaining volumes from an infrastructure standpoint does not equate to being contractually authorized to operate those volumes. The Draft EIR/EIS should identify where contractual compliance for train movement rights and operating slots—not merely physical capacity—is demonstrated. If such analysis exists in technical reports, it should be clearly referenced and summarized.				
3660	11	R. Soto	OCTA			X	General	Operations	Freight Volume Assumptions The Draft EIR/EIS does not clearly disclose the freight volumes or time-of-day distributions assumed for BNSF operations on the shared corridor. If the assumed freight activity is lower than that analyzed in the LOSSAN PEIR, the Draft EIR/EIS should explicitly explain this assumption, as reduced freight baselines could have cascading implications for future passenger rail service expansion and operational reliability.				

3661	12	R. Soto	OCTA			X	General	Operations	Definition of LOSSAN's Feeder Role The LOSSAN PEIR and Business Plan characterize corridor improvements as strengthening LOSSAN's role as a feeder network to the statewide high-speed rail system. The Draft EIR/EIS does not define this feeder role operationally. Specifically, the Draft EIR/EIS should clarify whether elements such as timed transfers, schedule coordination, fare integration, passenger wayfinding, platform adjacency, dwell times, and turnback strategies are binding commitments or aspirational concepts, and how CHSRA intends to implement and enforce these elements.				
3662	13	R. Soto	OCTA			X	General	Operations	Grade Separations and Corridor-Wide Reliability The Draft EIR/EIS highlights five new full grade separations as a benefit of the Shared Passenger Track Alternatives. However, it is unclear whether these grade separations have been evaluated within a corridor-wide reliability framework or only in relation to the high-speed rail footprint. The Draft EIR/EIS should explain how the proposed grade separations align with LOSSAN PEIR and Metrolink corridor bottleneck priorities, particularly in areas where nighttime freight operations are expected, and whether they meaningfully improve overall corridor performance.				
	EIR_EIS VOLUME 1											
3663	14	E. Smith	Mott MacDonald			X	General	R/W Impacts	The project proposes five new grade separations, with eight existing crossings retained in Anaheim. OCTA will need to be involved in the discussions related to designs, traffic flow, and safety improvements from these changes.			
3664	15	E. Smith	Mott MacDonald			X	General	Operations	Plans for light maintenance yards at 26th or 15th Street in Vernon must not interfere with freight or regional service operations nearby. Freight tracking, scheduling, and ensuring freight capacity is maintained alongside HSR will be critical during construction/operations.			
3665	16	E. Smith	Mott MacDonald			X	General	Operations	Assess freight rail interoperability and the ability to maintain capacity during and after construction to avoid or mitigate access/service operation disruptions. The existing and future regional operations will need to maintain alignments with speed and frequency goals identified by OCTA.			
3666	17	R. Vandenberg	Rheia Consulting			X	General, p. S-62	Operations	This should specifically address required coordination and analysis with respect to existing purchase and sale, shared use, railroad operating, and capital improvements agreements between and among BNSF, OCTA, RCTC, Metro, and SCRRA. Modification of these agreements terms would be required to allow for HSR train operation on shared tracks within the LOSSAN Corridor and through Fullerton Junction.			
3667	18	R. Vandenberg	Rheia Consulting			X	General, p. S-77	Operations	This should acknowledge the potential impacts of HSR facilities at ARTIC with respect to the ongoing OC VIBE development, which includes the ARTIC site.			
3668	19	R. Vandenberg	Rheia Consulting			X	Project Purpose, Need, and Objectives, p. 1-40	Operations	Add after last paragraph: This section should also acknowledge SCORE plans for increased service frequencies (30-minute headways) for OC Line and 91/Perris Valley Line that would be affected by the HSR operation.			
3669	20	R. Vandenberg	Rheia Consulting			X	Project Purpose, Need, and Objectives, p. 1-41	Operations	Third bullet; edit to: "Expand Metrolink capacity and service to include 30-minute frequency, upgrade existing Metrolink station facilities.			
3670	21	R. Vandenberg	Rheia Consulting			X	Project Purpose, Need, and Objectives, p. 1-24	Operations	Existing passenger rail operations are subject to existing railroad agreements that define rights and obligations with respect to passenger rail services along the LOSSAN Corridor. These should be acknowledged in the document.			
3671	22	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-2	Operations	The discussion of efforts required to maintain existing passenger and freight rail operation does not mention the additional coordination and collaboration required with LOSSAN, SCRRA and their member agencies to assure that planned shared use track configuration avoids impacts to planned intercity and regional rail service expansion in the shared corridor.			

23	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-4	Operations	Add text following last paragraph: Existing railroad agreements establish rights and obligations of BNSF, RCTC, OCTA, and Metro in the operation of trains within defined rights of way and easements owned by these parties. The freight operator (BNSF) cannot unilaterally require changes to operational patterns outside of the parameters of these agreements. The document does not describe/proscribe how this operational planning and required modifications to existing agreements would happen. Also add footnote: Although freight rail would generally not operate on shared-track alignment, changes to operational patterns may be required by freight operators because of new and realigned tracks in the LOSSAN Corridor.				
24	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-7	Operations	Operation of proposed HSR trainsets on shared tracks without temporal separation from conventional passenger and freight trains would require an exception from compliance with 49 CFR 238.				
25	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-11	Operations	USDOT guidance calls for passenger rail facilities within urbanized areas to provide for 200-year flood protection.				
26	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-21	Operations	Address how HSR PTC system will be integrated with the existing Metrolink PTC.				
27	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-51	Operations	Because of the unique importance of the future planned regional and intercity rail service with which the HSR trains will share operating tracks, a table describing current and proposed passenger rail frequencies (Metrolink, Pacific Surfliner, Southwest Chief) between LA and Fullerton and Fullerton to Anaheim would provide greater clarity of the operational context within which the HSR trains would operate. This will need to include current/planned Metrolink OC Line and 92/Perris Valley Line trains that operate through Fullerton Junction.				
28	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-59	Operations	Because of its critical importance in rail capacity, the modifications to the Fullerton Junction should be identified in the narrative.				
29	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-91	Operations	Clarify how the HSR PTC and train control will be coordinated and interfaced with existing PTC system and train dispatch within the shared corridor.				
30	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-143	Operations	The 2012 CHSRA MOU with So Cal Agencies also identified the following early action grade separations: Ball Road and Orangethorpe Ave.				
31	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-143	Operations	MOU(s) and modification of standing agreements among existing rail operators will be required in the shared use corridor to define/update maintenance responsibilities of each rail operator.				
32	R. Vandenberg	Rheia Consulting			X	Alternatives, p. 2-156	Operations	Allowable train volumes in the SBS are also addressed in the subsequent Capital Improvements Agreement (2nd amendment in 2000) and Purchase and Sale Agreement (5th amendment in 1993). The Shared Used Agreement for the San Diego Sub & Olive Sub (1992) governs allowable train operations south of Fullerton Junction.				
33	R. Vandenberg	Rheia Consulting			X	Introduction, p. 3.1-14	Operations	Operational Impacts: Should also note potential impacts of HSR operations on other rail operators as this is a key consideration in the proposed shared track alternative.				
34	K. Khouri	OCTA				Transportation, p. 3.2-12-14	Operations	Many of the routes listed in Section 3.2, Transportation, in tables 3.2-12, 3.2-13, and 3.2-14 are discontinued or do not serve the outlined project area. Please refer to the current OCTA system map for bus routes that enter the project area and serve proposed stations.				
35	R. Vandenberg	Rheia Consulting			X	Transportation, p. 3.2-43	Operations	Consistent with definition for significant impacts to transit, clarify that the project would have a significant impact it if would conflict with established plans and programs or otherwise decrease the performance of existing rail service.				
36	R. Vandenberg	Rheia Consulting			X	Transportation, p. 3.2-68	Operations	Confirm that this is complete and up to date (reference older plans).				

37	R. Vandenberg	Rheia Consulting			X	Hydrology and Water Resources, p. 3.8-46	Operations	How does the project address FEMA and USDOT policies for protection of rail facilities against 200-year flood?				
38	R. Vandenberg	Rheia Consulting			X	Safety and Security, p. 3.11-125	Operations	How does the DEIS/EIR address coordination with existing safety and security plans of rail operators and ROW owners within the shared corridor and at shared station sites?				
39	R. Vandenberg	Rheia Consulting			X	Safety and Security, p. 3.11-37	Operations	Under Operational impacts, second bullet, add "operating within the shared HSR corridor".				
40	R. Vandenberg	Rheia Consulting			X	Safety and Security, p. 3.11-66	Operations	Address also how HSR safety and security will be coordinated with SCRRA plans and Amtrak (SW Chief)`				
41	R. Vandenberg	Rheia Consulting			X	Safety and Security, p. 3.11-105	Operations	Document should recognize distinct roles of Amtrak and LOSSAN Agency for operation of long distance and intercity Amtrak service, respectively.				
42	R. Vandenberg	Rheia Consulting			X	Safety and Security, p. 3.11-106	Operations	Portions of the proposed shared corridor are unique that there are adjacent industry tracks and spurs that are not consistency with typical HSR access controls. What measures will be taken at those locations to prevent intrusion?				
43	R. Vandenberg	Rheia Consulting			X	Socioeconomics and Community, p. 3.12.20	Operations	Anaheim Municipal Code Title 18 includes specific policies and zoning requirements for the Platinum Triangle, including the ARTIC site (Platinum Triangle Mixed Use Overlay Zone).				
44	R. Vandenberg	Rheia Consulting			X	Socioeconomics and Community, p. 3.12.22	Operations	Anaheim Municipal Code Chapter 18.20 addresses specific intent and requirements for Platinum Triangle, including ARTIC station site.				
45	R. Vandenberg	Rheia Consulting			X	Cumulative Impacts, p. 3.19.31	Operations	Regarding first sentence of last paragraph: The shared track alternative would add new passenger train service to the LOSSAN Corridor and, as such, clearly affect existing railroad agreements, including the joint and inseverable easement held by OCTA and RCTC for exclusive passenger operation within the BNSF SBS between Redondo Junction and Fullerton Junction. OCTA obligations to support BNSF operations within the OCTA-owned corridor south of Fullerton Junction may also be affected. Impacts may include constraints on the number of new passenger train slots and prioritization of trains.				
46	R. Vandenberg	Rheia Consulting			X	Other CEQA NEPA Considerations, p. 7-1	Operations	The document does not identify specific mitigation measures that memorialize the need for critical MOUs and amendments to standing railroad agreements to incorporate new HSR passenger trains and define/update railroad operator rights and obligations with overlay of HSR operations on existing shared use rail corridor.				
47	R. Vandenberg	Rheia Consulting			X	Preferred Alternative, p. 8-30	Operations	Proposed HSR improvements at ARTIC would also need to be coordinated with OC VIBE development, existing transit operators, "Building Bridges to Transit" project (2023 RAISE grant), and OCTA OC Mobility Hubs Strategy.				
48	R. Vandenberg	Rheia Consulting		X		GE-D6101	BoD	Fullerton Junction - viability of overall configuration needs to be confirmed with simulations that incorporate future Metrolink service plans for OC, IEOC, and Riverside Lines, allowing for normal variations in train operations				
49	R. Vandenberg	Rheia Consulting		X		GE-D6101	BoD	Do crossover configurations provide adequate operational flexibility for Metrolink trains serving relocated Commerce Station, relocated Buena Park Station, and reconfigured Fullerton Station?				
50	R. Vandenberg	Rheia Consulting		X		GE-D6101	BoD	26th St LMF yard lead configuration could affect shared passenger operation. NB access into yard required HSR trains to operate on M4 from CP Bandini; NB access out of yard would require HSR to operate on M4 to CP Olympic (north of Redondo Junction flyover).				
51	R. Vandenberg	Rheia Consulting		X		TT-B3001	BoD	Does 10.67' clearance meet Metrolink requirements for increased horizontal clearance through curves? (typ all locations)				

52	R. Vandenberg	Rheia Consulting		X		TT-D3003	BoD	Does access control fence at sidings extend across siding tracks? How is access control maintained without interfering with regular freight operation into adjacent industry properties?				
53	R. Vandenberg	Rheia Consulting		X		TT-D3011	BoD	Clarify 10' horizontal clearance. Is this to existing bridge pier? If so, confirm that there is adequate clearance for pier protection.				
54	R. Vandenberg	Rheia Consulting		X		TT-D3023	BoD	Would walkway more appropriately be placed on outside of catenary pole line as is shown on other side of ROW? (typ)				
55	R. Vandenberg	Rheia Consulting		X		TT-D1604	BoD	Verify clearance from PS to GC is at least 100 ft.				
EIR_EIS VOLUME 2												
56	R. Vandenberg	Rheia Consulting	X			Project Description p. 2-9	Operations	Does not acknowledge or address how the HSR PTC will integrate with existing Metrolink PTC system.				
57	R. Vandenberg	Rheia Consulting	X			Project Description p. 2-35, Section 2,3,3	Operations	Should acknowledge the need to also coordinate with OCTA and RCTC, who together have exclusive easement for passenger rail operations under established purchase and sale agreements and shared use agreement.				
58		OCTA			X	Appendix 2-A, p. 2-A-24	Stormwater Management	HYD-IAMF#1: To comply with SCRRA design standards to be reviewed and approved by SCRRA and OCTA within the Orange Sub and OCTA owned right of way.				
59		OCTA			X	Appendix 2-A, p. 2-A-24	Flood Protection	HYD-IAMF#2: To comply with SCRRA design standards to be reviewed and approved by SCRRA and OCTA within the Orange Sub and OCTA owned right of way.				
60		OCTA			X	Appendix 2-A, p. 2-A-27	Land Use	LU-IAMF#3: Authority needed TCEs need to be acquired prior to construction and the conditions including costs to be negotiated with property owners.				
61		OCTA			X	Appendix 2-A, p. 2-A-38	Public Notifications	PUE-IAMF#3: Notifications need to be coordinated with SCRRA, OCTA, and impacted Cities; some utility outage will required much longer coordination with each impacted agencies as critical infrastructure depends on the utility service.				
62		OCTA			X	Appendix 2-A, p. 2-A-29	Safety & Security	All construction safety and security must comply with SCRRA's latest right of entry permit requirements and must have property RWP safety training and appropriate railroad flagging support; additional OCTA safety and liability requirements may apply.				
63		OCTA			X	Appendix 2-A, p. 2-A-36	Operations	TR-IAMF#8: Liquidated damages may be assessed by SCRRA if the contractor damages or impacts the operations of the RR service. Special provisions are required to be included in the contract.				
64	R. Vandenberg	Rheia Consulting			X	Appendix 2-E, Section 6.1, p. 14	Operations	This high-level statewide discussion of operations does not address the specific requirements of the LA-Anaheim shared corridor.				
65	R. Vandenberg	Rheia Consulting			X	Appendix 3.2-D-1	Transportation	What traffic analysis / mitigation measures / traffic operational improvements have been identified and incorporated to address relocation of the Buena Park Metrolink Station?				

EIR_EIS VOLUME 3											
54	A. Shah	HDR Engineering		X		TT-D1598	R/W Impacts	Intersection of Highland and Walnut Ave will need to be reviewed. There is traffic signal equipment where the bridge is being proposed. Any modifications to the intersection and R/W impacts need to be included in the design.			
55	A. Shah	HDR Engineering		X		TT-D1599	Station	Will there be a pedestrian overpass from the parking structure to the platform?			
56	A. Shah	HDR Engineering	X			GE-B0101	BoD	2. Design Speeds: SCRRA maximum allowable speed for passenger trains is 90mph			
57	A. Shah	HDR Engineering	X			GE-B0101	BoD	3. Track Center Spacing: need RFSDC			
58	A. Shah	HDR Engineering	X			GE-_0110	All	State College Grade Separation is not being built by OCTA.			
59	A. Shah	HDR Engineering		X		RW-M1591	R/W Impacts	These R/W drawings do not show all of the improvements being proposed by CHS, therefore making it difficult to assess whether adequate R/W acquisition is shown. Further, these colored maps do not indicate what R/W is being acquired, what is needed for easement, and what is needed for TCE. This does not set the R/W footprint adequately. Critical rail assets such as signals are not shown anywhere on the plans, and will likely have additional R/W impacts that should be determined now.			
60	R. Vandenberg	Rheia Consulting		X		GE-D6101	Service	26th St LMF yard lead configuration could affect shared passenger operation. NB access into yard required HSR trains to operate on M4 from CP Bandini; NB access out of yard would require HSR to operate on M4 to CP Olympic (north of Redondo Junction flyover). Do crossover configurations provide adequate operational flexibility for Metrolink trains serving relocated Commerce Station, relocated Buena Park Station, and reconfigured Fullerton Station? Fullerton Junction - viability of overall configuration needs to be confirmed with simulations that incorporate future Metrolink service plans for OC, IEOC, and			
61	R. Vandenberg	Rheia Consulting		X		TT-D3003	Design	Does access control fence at sidings extend across siding tracks? How is access control maintained without interfering with regular freight operation into adjacent industry properties?			
62	R. Vandenberg	Rheia Consulting		X		TT-B3001	Design	Does 10.67' clearance meet Metrolink requirements for increased horizontal clearance through curves? (typ all locations).			
63	R. Vandenberg	Rheia Consulting		X		TT-D3011	Design	Clarify 10' horizontal clearance. Is this to existing bridge pier? If so, confirm that there is adequate clearance for pier protection.			
64	R. Vandenberg	Rheia Consulting		X		TT-D3023	R/W Impacts	Would walkway more appropriately be placed on outside of catenary pole line as is shown on other side of ROW? (typ)			
65	R. Vandenberg	Rheia Consulting		X		TT-D1604	Design	Verify clearance from PS to GC is at least 100 ft.			

66	R. Vandenberg	Rheia Consulting		**X**		CV-T1267	Design	How will required min. clearance of 15.5 ft be maintained during construction of RR bridge modifications?				
67	R. Vandenberg	Rheia Consulting		**X**		ST-K1266	Design	How will emergency egress be provided for Buena Park Station platform under the Beach Blvd bridge?				
68	R. Vandenberg	Rheia Consulting		**X**		ST-K3266	Design	Typical Section: Construction of widened bridge requires elimination of one existing operating track during construction. How will this impact be mitigated?				
69	R. Vandenberg	Rheia Consulting		**X**		ST-K1269	Design	Construction of bridge widening will require work within what appears to be 10' of centerline of active track (dimension not shown).				
70	R. Vandenberg	Rheia Consulting		**X**		CV-T1271	Design	How will min. 15.5 ft clearance be maintained during bridge construction?				
71	R. Vandenberg	Rheia Consulting		**X**		ST-K1271	Design	Typical Section: Construction of bridge widening requires work within what appears to be 8 ft from active tracks (dimension not shown).				
72	R. Vandenberg	Rheia Consulting		**X**		CV-T1302	Design	How will min. vertical clearance be maintained during construction? (typ both sides of bridge)?				
73	R. Vandenberg	Rheia Consulting		**X**		ST-K3301	Design	Show clearance between existing active track and proposed new construction. Differential in elevation of M3 and LA-A NB tracks appears would require ballast retainer.				
74	R. Vandenberg	Rheia Consulting		**X**		ST-K3301	Design	Show clearance between existing active track and proposed new construction. Differential in elevation of M3 and LA-A NB tracks appears would require ballast retainer.				
75	R. Vandenberg	Rheia Consulting		**X**		ST-K1311	Design	Typical Section: Construction of new proposed shared bridge will first require removal of the existing single track RR bridge. How will operating impacts be mitigated during construction?				
76	R. Vandenberg	Rheia Consulting		**X**		CV-T1351	Design	How will min. clearance be maintained during construction?				

77	R. Vandenberg	Rheia Consulting		X		ST-K1361	Design	Typical Section: Unique Metrolink platform structure would straddle two bridges.				
78	R. Vandenberg	Rheia Consulting		X		AR-B0900	Access	Very long path of travel from parking structure to center Amtrak/Metrolink platform. Metrolink standards call for platform access close to center of platform, while proposed solution provides access only from one end of platform. How will emergency egress be provided from the end of center platform.				
79	R. Vandenberg	Rheia Consulting		X		AR-B0901	All	Note 1: Note should include coordination with OCTA and other transit providers.				
Technical Reports												
80	J. Lee	OCTA			X	2-A-24	Stormwater Management	To comply with SCRRA design standards to be reviewed and approved by SCRRA and OCTA within the Orange Sub and OCTA owned right of way.				
81	J. Lee	OCTA			X	2-A-24	Flood Protection	Same comment as above.				
82	J. Lee	OCTA			X	2-A-27	Land Use	Authority needed TCEs need to be acquired prior to construction and the conditions including costs to be negotiated with property owners.				
83	J. Lee	OCTA			X	2-A-28	Public Notifications	Notifications need to be coordinated with SCRRA, OCTA, and impacted Cities; some utility outage will required much longer coordination with each impacted agencies as critical infrastructure depends on the utility service.				
84	J. Lee	OCTA			X	2-A-29	Safety & Security	All construction safety and security must comply with SCRRA latest right of entry permit requirements and must have property RWP safety training and appropriate railroad flagging support; additional OCTA safety and liability requirements may apply.				
85	J. Lee	OCTA			X	2-A-36	Transportation	Liquidated damages may be assessed by SCRRA if the contractor damages or impacts the operations of the RR service. Special provisions are required in be included in the contract.				
86	R. Vandenberg	Rheia Consulting			X	2-4	Aesthetics &Visual Quality	Fullerton row, 4th bullet: Confirm that this is consistent with existing purchase & sale and shared use agreements, or what modification to those agreements would be required as a result of the project.				
87	R. Vandenberg	Rheia Consulting			X	2-12	Aesthetics &Visual Quality	Section 2.2.1.5: There seems to be a typo here - are the two mainline tracks shared by passenger rail and freight operators to be electrified or non-electrified?				
88	R. Vandenberg	Rheia Consulting			X	2-13	Aesthetics &Visual Quality	Figure 2-10: Confirm that HSR Yard lead tracks are long enough to avoid impacts of slowing HSR trains on other passenger train operations.				
89	R. Vandenberg	Rheia Consulting			X	2-18	Aesthetics &Visual Quality	An 800-foot center platform does not match Amtrak standard platform length of 1,000 feet.				
90	R. Vandenberg	Rheia Consulting			X	2-19	Aesthetics &Visual Quality	Figure 2-14: Clarify access between platforms - grade-separated ped access?				

91	R. Vandenberg	Rheia Consulting			X	2-20	Aesthetics &Visual Quality	Figure 2-15: See comments on other sections re long path of travel, platform length, and emergency egress.				
92	R. Vandenberg	Rheia Consulting			X	2-21	Aesthetics &Visual Quality	What traffic analysis was conducted to identify traffic operational impacts, improvements, and mitigations related to Buena Park Station relocation?				
93	R. Vandenberg	Rheia Consulting			X	2-34	Aesthetics &Visual Quality	Section 2.3.1: The 2012 HSR MOU with So Cal Agencies included as early action projects additional OC grade separations at Ball Rd and Orangethorpe Ave; these should be added to this list				
94	R. Vandenberg	Rheia Consulting			X	2-38	Transportation	Figure 2-24: See comments elsewhere re: long path of travel, platform length, and emergency egress				
95	R. Vandenberg	Rheia Consulting			X	2-40	Transportation	Table 2-7: This schedule doesn't prioritize early works grade separation.				
96	R. Vandenberg	Rheia Consulting			X	2-38	Transportation	Figure 2-24: See comments elsewhere re: long path of travel, platform length, and emergency egress.				
97	R. Vandenberg	Rheia Consulting			X	2-41	Transportation	Section 2-7: This report should also address whether HSR plans would preclude or impact planned passenger train service and frequency improvements planned for Metrolink and LOSSAN services. Similar to as stated for freight, the HSR solution should commit to maintain current and projected passenger train volume. Existing railroad agreements (re purchase & sale, shared use, capital improvements) that establish railroad operator rights and obligations should be acknowledged and described. The overlay of HSR service within the LOSSAN corridor would require modification or renegotiation of these agreements and concurrence among all parties to those standing agreements that would be affected by HSR operation in the LOSSAN corridor (Metro, OCTA, RCTC, SBCTA, NCTD, LOSSAN Agency, SCRRA, and BNSF). A stand-alone MOU between BNSF and HSR would not supplant or take precedence over these standings.				
98	R. Vandenberg	Rheia Consulting			X	3-21	Transportation	Section 3.3.4.2: This narrative is not up to date. The "forthcoming" Transit Master Plan was released as the 2024 OC Transit Vision in May 2025. This master plan document places heavy emphasis on "transit opportunity corridors" that will connect to Metrolink stations and complement planned increases to Metrolink service frequencies. The plan also identified the Metrolink Buena Park and Fullerton Stations for pilot projects to improve first-and last-mile connections to Metrolink. The potential impacts of station modifications to these plans and pilot projects should be addressed.				
99	R. Vandenberg	Rheia Consulting			X	3-22	Transportation	Section 3.3.4.2: This discussion does not accurately reflect the conclusions and recommendations of the 2017 State of OC Transit document, nor the resulting strategies that are presented in the 2024 Transit Vision, which presents service expansion plans for Metrolink and transit improvements along and connecting to high-demand corridors including the LOSSAN Corridor				
100	R. Vandenberg	Rheia Consulting			X	4-3	Transportation	Traffic impacts due to relocation of Buena Park Metrolink station do not appear to be addressed.				
101	R. Vandenberg	Rheia Consulting			X	5-28	Transportation	Should acknowledge clearly-defined objective for 30 min. all-day frequency OC Line ridership is out of date (5,116 in most recent Metrolink fact sheet)				
102	R. Vandenberg	Rheia Consulting			X	5-94	Transportation	Figure 5-20: Should show OC River Walk.				
103	R. Vandenberg	Rheia Consulting			X	5-95	Transportation	Figure 5-21: Map is not reflective of all existing and planned bike facilities. See City of Anaheim GIS mapping: https://www.arcgis.com/apps/View/index.html?appid=f8b43cf542324de2baac76aad0558bd3&utm				

3765	**104**	R. Vandenberg	Rheia Consulting			X	6-5	Transportation	Table 6-1: Check Metro is the lead agency for Project #s: ORA020113 and ORA120531. Remove duplicated projects.			
3766	**105**	R. Vandenberg	Rheia Consulting			X	6-6	Transportation	Table 6-1: List does not appear to be up to date.			
3767	**106**	R. Vandenberg	Rheia Consulting			X	6-25	Transportation	ARTIC Station Area: Does analysis reflect OC VIBE build-out?			
3768	**107**	R. Vandenberg	Rheia Consulting			X	6-48	Transportation	Section 6.3.1.4: Does ARTIC trip data reflect OC VIBE build-out?			
3769	**108**	R. Vandenberg	Rheia Consulting			X	6-226	Operations	This section does not address the localized effects of the rearrangement of freight rail yards, which could impact the availability of passenger train slots that were identified and modeled based on specific capital improvements as input to existing shared use agreements. Results of railroad modeling performed by CHSRA along the LOSSAN Corridor and through the Fullerton Interlocker are not provided.			#NAME?

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1	R. Vandenberg	Rhela Consulting				Transmittal Letter	NA	Preferred alternative does not include HSR Station at Fullerton. How will HSR Fullerton Station and Modified Metrolink Fullerton Station be addressed in the				
								PEDP VOLUME 3.1				
2	A. Shah	HDR Engineering		X		GE-D0101	General	Suggest having sheet after symbols because it is unclear what the blue linework is				
3	A. Shah	HDR Engineering		X		GE-B0101	General	Metrolink design criteria requires 15' minimum track spacing. Need to review and file RFSDCs for where Metrolink commuter tracks are shown with reduced track spacing.			Close	
4	A. Shah	HDR Engineering		X		GE-B0101	General	Max design speed for this corridor is 110mph				
5	R. Vandenberg	Rhela Consulting		X		GE-D6101	General	Fullerton Junction - viability of overall configuration needs to be confirmed with simulations that incorporate future Metrolink service plans for OC, IEOC, and Riverside Lines, allowing for normal variations in train operations			Close	
6	R. Vandenberg	Rhela Consulting		X		GE-D6101	General	Certain XO configurations appear to limit operational flexibility for Metrolink trains, including: • No XO are provided on the north side of the Relocated Metrolink Commerce Station • XO configuration south of Relocated Buena Park Station • At CP Santa Fe Springs (MP 155.0), SB operation on M3 (if required) does not have access to the west Norwalk/Santa Fe Springs Metrolink Station platform • 2 LH XO rather than universal configuration north of Fullerton Station • CP Orangethorpe (MP 166.2) includes 2 LH crossovers rather than universal configuration				
7	R. Vandenberg	Rhela Consulting		X		GE-D6101	General	26th St LMF yard lead configuration could affect shared passenger track operations as: • NB access into 26th St LMF would require NB HSR trains to operate on M4 from CP Bandini (MP 148.9) to the LMF lead (approx MP 146) • NB access out of the 26th St LMF would require NB HSR trains to operate on M4				
8	R. Vandenberg	Rhela Consulting		X		TT-D3001	Track Alignment	In Section C-C, please demonstrate that proposed 10' horizontal clearance between M1 track and OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
9	R. Vandenberg	Rhela Consulting		X		TT-D3003	Track Alignment	How will ROW access be controlled at industry sidings?				
10	R. Vandenberg	Rhela Consulting		X		TT-B3001, TT-D3005, TT-D3006, TT-D3015, TT-D3016, TT-D3029, TT-D3030, TT-D3031	Track Alignment	On aerial structure, please demonstrate that proposed min. 10.67' horizontal clearance to OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
11	R. Vandenberg	Rhela Consulting		X		TT-D3008	Track Alignment	Section L-L: identify which station this is (Commerce Station)				
12	R. Vandenberg	Rhela Consulting		X		TT-D3011	Track Alignment	Section R-R at 605 Fwy: please clarify what 10' horizontal clearance is to... if to bridge pier, demonstrate that there is adequate clearance for pier protection that will be required for Caltrans structure				
13	R. Vandenberg	Rhela Consulting		X		TT-D3023	Track Alignment	At retained fill sections through Buena Park, can east (left) walkway be moved outside OCS poles (like at west/right)?				
14	A. Shah	HDR Engineering		X		TT-D3027	Track Alignment	Need a dimension to the intertrack fence from the CL of track				
15	R. Vandenberg	Rhela Consulting		X		TT-D3028	Track Alignment	Section NN-NN at Fullerton Jct: please explain clearance between BNSF M3 and SCRRA MT1 which is shown as 0' to 108'. Where 0', is this a shared track?				
16	R. Vandenberg	Rhela Consulting		X		TT-D1503, TT-D1603	Track Alignment	It would be useful to show in Plan and Profile sheets which tracks are intended solely for passenger train operations, which tracks are dedicated for freight use, and which tracks would support shared passenger / freight operations.				
17	G. Jennings	Mott MacDonald		X		TT-D1581	Track Alignment	NW end of new station platforms have horizontal/vertical curvature for New Metrolink Buena Park Station. Depending on train stopping positions, the risk to platform train interface (PTI) could be minimal but is there opportunity to remove curvature for a new station and de-risk construction and PTI? Note the platform location is not shown on the profile which would aid understanding (platforms are identified in other drawings)				

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18	G. Jennings	Mott MacDonald		X		TT-D1584, TT-D1592, TT-D1621, TT-D1622	Track Alignment	There are a number of turnout/crossover units in a complex arrangement which are located on (or are in close proximity) to the underpasses. This imparts a risk in terms of differential track stiffness (due to the stiff bridge structure) for operationally critical assets with impacts on maintenance and the risk/consequence of derailment. How has the risk been considered/assessed/mitigated, as additonal landtake may be required to relocate the complex turnout/crossover units? Also relates to grade separation drawings ST-K1271, ST-K3301, ST-K1571 in volume 3.3 and drawing B-1 in volume 3.3A				
19	G. Jennings	Mott MacDonald		X		TT-D1599	Track Alignment	No.11 and No. 20 Turnout are located in close proximity to the Fullerton station platform ends. Noted that train control systems are not part of this contract but this distance may be a challenge for signal standback and overlaps, has this be				
20	A. Shah	HDR Engineering		X		TT-D1599	Track Alignment	Will the existing ped bridge be protected in place or removed?				
21	R. Vandenberg	Rhela Consulting		X		TT-D1619	Track Alignment	Operational implications of shared use of proposed HST overnight storage lead with UPRR local freight movement needs to be better understood (connection to UP Tustin Branch)				
22	R. Vandenberg	Rhela Consulting		X		TT-D1604	Track Alignment	100-ft min. is required between #20 TO PS and Orangethorpe Ave GC				
23	R. Vandenberg	Rhela Consulting		X		TT-D1604	Track Alignment	Show PS to existing Metrolink storage track south of Orangethorpe Ave				
24	J. Lee	OCTA		X		General	Track Alignment	OCS poles shown throughout the plans will reduce the overall usable ROW for OCTA and the ability for expansion in the future				
25	J. Lee	OCTA		X		General	ROW	The dedicated HSR storage tracks proposed will occupy most of OCTA's ROW and prevent the owner from future service expansion and other uses				
26	J. Lee	OCTA		X		General	ROW	Use of OCTA's ROW for HSR as shared use including new improvements should be discussed and agreed upon				
27	J. Lee	OCTA		X		General	ROW	ROW discussions and negotiations between HSR and BNSF only apply to the corridor north of Fullerton Junction; need to add a note to discuss and negotiate with OCTA on the corridor south of Fullerton Junction to ARTIC Station				
28	I. Watkins	Mott MacDonald		X		RW-M1598-1560	ROW	Note that agreements will be required for rail and public ROW area adjustments around modified Metrolink Fullerton Station with OCTA. Who will be the lead agency for such agreements?				
29	I. Watkins	Mott MacDonald		X		RW-M1598-1623	ROW	Note that agreements will be required for rail ROW area adjustments around proposed HSR Anaheim Station with OCTA. Who will be the lead agency or such agreements?				
							PEDP VOLUME 3.3					
30	A. Evans	Mott MacDonald		X		CV-T0266	Grade Sep	The new alignment near Buena Park Station will move HSR lines closer to residential properties to the south. What mitigation is anticipated in terms of acoustic treatment and/or potential purchase of some of the properties to provide credible offset between residents and the rail corridor?				
31	R. Vandenberg	Rhela Consulting		X		CV-T1267, CV-T1271, CV-T1302	Grade Sep	Beach Blvd / Dale St / Commonwealth Ave grade separation - min. vertical clearance for roadway below RR bridge matches existing (15.5 ft) but would be reduced by falsework during construction. What would vertical clearance be during construction?				
32	R. Vandenberg	Rhela Consulting		X		ST-K1266	Grade Sep	Buena Park Station Platform extends onto Beach Blvd grade separation structure - how will emergency egress be achieved?				
33	R. Vandenberg	Rhela Consulting		X		ST-K3266	Grade Sep	Proposed construction at Beach Blvd grade separation requires demolition of existing bridge parapet wall adjacent to track M1. This would need to be accomplished while maintaining existing M1 track in place until new M1 alignment is constructed to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				

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34	R. Vandenberg	Rhela Consulting		X		ST-K1269	Grade Sep	Proposed construction at Break Creek requires demolition of existing bridge parapet wall and raised walkway adjacent to track M3. This would need to be accomplished while maintaining existing M3 track in service to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
35	R. Vandenberg	Rhela Consulting		X		ST-K1271	Grade Sep	Proposed construction at Dale St grade separation requires demolition of existing bridge parapet and walkway adjacent to M1 (LA-A SB). This would need to be accomplished while maintaining existing LA-A SB track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
36	R. Vandenberg	Rhela Consulting		X		CV-T3281	Grade Sep	What intrusion protection or other measures are being taken to avoid people/objects getting into trench section adjacent to Artesia Ave?				
37	R. Vandenberg	Rhela Consulting		X		ST-K1291	Grade Sep	Proposed construction at Gilbert St grade separation requires demolition of existing bridge parapet and walkway adjacent to M4. This would need to be accomplished while maintaining existing track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
38	R. Vandenberg	Rhela Consulting		X		ST-K1291, ST-K1541	Grade Sep	Is 2' clearance sufficient for seismic interactions between two RR bridges? Provide relevant codes.				
39	R. Vandenberg	Rhela Consulting		X		ST-K3301	Grade Sep	Commonwealth Ave Section B and Section E - verify no ballast retainer is needed between M3 and LA-A NB due to difference in profile elevation				
40	R. Vandenberg	Rhela Consulting		X		ST-K1311	Grade Sep	Proposed construction at Euclid St requires demolition of existing single-track RR bridge to allow for construction of new 2 track shared bridge. While 5 tracks still available during construction, some of these are used by BNSF for storage. Storage of trains should be precluded during construction to minimize impacts to passenger train operations				
41	R. Vandenberg	Rhela Consulting		X		CV-T1322	Grade Sep	Walnut Ave grade separation proposes 15.67 ft min clearance. Point of measurement in cross section is at roadway crown, clearance at corner of RR bridge soffit should be verified/shown on drawing				
42	R. Vandenberg	Rhela Consulting		X		CV-T1351	Grade Sep	Highland Ave grade separation - min. 15.67 ft clearance matches existing but will be reduced by falsework during construction				
43	R. Vandenberg	Rhela Consulting		X		ST-K1361	Grade Sep	Proposed construction at Harbor Blvd grade separation requires removal of existing bridge fence/barrier next to existing m3 track and walkway next to existing m1 track. Provisions for temporary parapet or other measures to retain CPUC walkway during construction?				
44	R. Vandenberg	Rhela Consulting		X		ST-K1361	Grade Sep	Harbor Blvd grade separation typical section – is HSR platform cantilevered over existing structure? What is interaction between two bridges?				
45	R. Vandenberg	Rhela Consulting		X		ST-K1571, ST-K1572	Grade Sep	Proposed construction Katella Ave requires construction of half of new RR bridge, demolition of existing RR bridge, then construction of second half of new RR bridge. Verify constructability and clearances between first half of new RR bridge and existing RR bridge. First half of new RR bridge would need to be able to support operation of two tracks but current construction staging concept only provides 6'10" horizontal clearance between M2 and temporary parapet wall				
46	R. Vandenberg	Rhela Consulting		X		CV-T1583	Grade Sep	Douglass Service Rd proposes 13' minimum clearance under new RR bridge. Does that agree with Metrolink standards?				
47	R. Vandenberg	Rhela Consulting		X		ST-K1582	Grade Sep	Please check vertical clearance labels and notes				
48	J. Lee	OCTA		X		General	Grade Sep	Construction phasing should be considered for grade separations to maintain full passenger operations during construction and minimize service disruptions				

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								PEDP VOLUME 3.4				
3818	49	G. Jennings			X		UT-C1585, UT-C1597, UT-C1604, UT-C1621	Utilities	Utilities in close proximity to turnouts/crossovers, Potential for differential track stiffness leading to dynamic forces, voiding and subsequent component failures; and therefore to increased maintenance activity. Risk may be mitigated by utility depth (not indicated on plan) but how has the risk been considered/assessed/mitigated, as additional landtake may be required to relocate the turnout/crossover units?				
3819	50	A. Shah	HDR Engineering		X		UT-C1599	Utilities	Need to detail with retaining wall				
3820	51	J. Lee	OCTA		X		General	Utilities	Utilities under license proposed to be relocated should include relocation costs and potential ROW needed if relocation cannot stay within OCTA's ROW				
3821	52	J. Lee	OCTA		X		General	Utilities	Confirm utility impacts from grade separations are also defined within the utility plans				
3822	53	A. Evans	Mott MacDonald		X		UT-C1599	Utilities	Note largest utility for coordination is City of Fullerton 36" Storm Drain which will need asset protection during the works but not necessarily diversion. Provide guidance on how this line will be protected?				
								PEDP VOLUME 3.5				
3823	54	R. Vandenberg	Rhela Consulting		X		AR-B0201	Stations	Commerce Station - proposed orientation of Metrolink platform and station plaza/parking creates a long path of travel for Metrolink riders, with platform accessible only from one end. This does not seem to meet the standard. Metrolink criteria calls for access to be provided at the center of the platform or as close as possible to mini-high platform. Explain how HSR will meet the standard and what the provisions are for emergency egress from the far end of the platform.				
3824	55	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Proposed relocation of Buena Park Station will include a 680' platform with accessible entrance to the transit plaza (via, pedestrian tunnel) and Beach Bvd (via, stair and lift). What ammenities will be provided at this relocated station similar to those provided at the existing Buena Park Station (including number of parking stalls, transit plaza,				
3825	56	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	What phase of construction will the entrance to Beach Blvd. be completed as part of the station relocation? This entrance would be complex to retrofit once the station is operational.				
3826	57	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details for potential pedestrian connection to Tulare Street. What phase of construction will the underpass be completed as a part of the station relocation? This element would be complex to retrofit once the station is operational.				
3827	58	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details how staging of works between relocated station and existing station will be arranged to minimize disruption to the public across all transit modes. Details of staging for Metrolink operations, OCTA Buses and transit plaza amenities etc. to be agreed.				
3828	59	J. Lee	OCTA		X		AR-B0601	Stations	With a planned year of construction, the parking capacity needs to be increased to accommodate the service improvements with the station relocation				
3829	60	R. Vandenberg	Rhela Consulting		X		AR-B0601	Stations	What are provisions for emergency egress from south end of Buena Park station platform at Beach Blvd grade separation?				
3830	61	R. Vandenberg	Rhela Consulting		X		AR-B0701	Stations	Offset of two Metrolink platforms creates a very long path of travel for SB Metrolink/Amtrak riders. More direct access should be provided between parking structure and SB platform.				
3831	62	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will there be any connection from the parking structure to the Amtrak/Metrolink center platform? What is the ped routing from the parking structure?				
3832	63	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will passenger trains be on the BNSF Main Tracks to be able to utilize the existing platform?				
3833	64	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will any of the existing station parking lot on the south side of the station be salvaged?				
3834	65	J. Lee	OCTA		X		AR-B0701	Stations	How will the enhanced sidewalk be accessed from Walnut? It appears there is a retaining wall along Walnut to support the track structure				

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66	J. Lee	OCTA		X		AR-B0701	Stations	Loss of station and street parking with direct access from Walnut should be mitigated				
67	J. Lee	OCTA		X		AR-B0701	Stations	Should evaluate the passenger path of travel from the amenities on the north side to the new platform for added time and degradation of convenience. Mitigate as needed.				
	J. Lee	OCTA		X		AR-B0701	Stations	The new platform length should accommodate both future Amtrak and Metrolink services				
68	A. Shah	HDR Engineering		X		AR-B0701	Stations	What are the exit points off of the center platform? Need to consider NFPA 130				
69	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Realignment to Fullerton Station configuration and termination of existing lines get connected through the new proposed 800' station length will require reconfiguration of Walnut Ave also required. Provide details of how this will be addressed.				
70	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Enhancing the interface with the TOD neighborhood area, is there any consideration for additional infrastructure (e.g. parking) for increased ridership as a consequence of High Speed? What improvements and parking encroaches partially in OTCA land will require purchase from other land owners?				
71	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Changes to overpass bridge for passengers to an underpass will require works during track realignment phase. How will HSR ensure existing service will be protected during construction works?				
72	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Note large new bridging structures required over Harbor Rd. to support track and new platform.				
73	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Anticipate that loss of parking for current revenue service will be required to support construction site in the temporary case. How will HSR mitigate this issue?				
74	A. Evans	Mott MacDonald		X		AR-Y9901	Stations	Note, all minimum public areas are met through proposed design for HSR requirements. However, it is unclear whether this includes interchange and/or increased ridership from Metrolink passengers as a consequence of the scheme, i.e. Will HSR improve current platform space/ticketing/amenties for the Metrolink				
75	A. Evans	Mott MacDonald		X		AR-Y9903	Stations	Parking set at 608 spaces. Is this current or forecasted to what year? Also, is there any consideration for increased ridership as a consequence of the interchange?				
76	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Clarity required on pedestrian modelling for pedestrian link between existing Artic Station, new HSR/Metrolink/Amtrak parking structure and HSR Station facility. How will HSR ensure sufficient space to allow anticipated cross movements between assets?				
77	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Proposed HSR alignment will require additional land purchase from adjacent stakeholders most noteably Angel Stadium. While consideration has been made to HSR drop off zone and associated road works, the environmental footprint terminates at North West corner of the site. What other road improvements are expected in order to complete the connection to E Katella Ave? Will HSR cover the cost for land acquisition?				
78	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New HSR platform will require extensive works over Douglass Road and beneath the Orange Fwy 57. Provide explanation for how removal of ~15No support columns can be achieved whilst also maintaining the operation of the Fwy. Any additional bracing structure would likely reduce headrooms beneath the Fwy to both the HSR platforms and potentially existing Metrolink/Amtrak platform.				
79	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Creation of new platform (including new bridge over Douglass Rd) will likely have impact on existing Metrolink / Amtrak infrastructure. Can HSR provide asset protection to ensure stability of line? If so, how? If not, any loss of revenue until reinstatement of existing infrastructure must be compensated.				
80	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Scheme appears to show curtailment of existing Metrolink/Amtrak platform. Provide possible mitigation efforts for potential impact on services based on this proposal.				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: A=Agreed and will comply/take action. B=Will investigate. C=Disagree for reasons noted in Response/Status Column. D=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
3851												
81	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Extended pedestrain undercrossings to serve HSR platform. The proposal offers new elevator access which is seen as a benefit, but also requires new access ramps to be integrated within existing platform width. How will this impact the remaining width of the platforms to ensure safe operational width? Note that during construction this will likely also limit the available length of platform for passengers.				
3852												
82	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New Station location will sever existing at grade access to Metrolink/Amtrak platforms (via stairs/ramps) from the south. How will HSR mitigate length of passenger travel routes to reach the new HSR platforms?				
3853												
83	A. Evans	Mott MacDonald		X		AR-B0901, AR-C1901	Stations	How will existing underpass between Artic bus terminal site for new station south of tracks be maintained to avoid excessive passenger travel routes for interchange?				
3854												
84	R. Vandenberg	Rhela Consulting		X		AR-B0901, AR-C1901, AR-J8901, AR-J8903	Stations	Coordinate ARTIC site plan as needed with ongoing final design efforts by City of Anaheim for "Building Bridges to Transit" project that includes new active transportation connections, ped bridges, and riverbank trail realignment. These ongoing improvements are not reflected in these drawings.				
PEDP VOLUME 3.6												
3855												
85	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	What options other than the track alignment and ROW impact have been considered? Provide details of those options and scoring criteria if implemented for review.				
3856												
86	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	It is assumed that a new station entrance will be provided on to Highland Avenue if the Fullerton Station option is implemented. Provide details of secondary means of escape to the west (if required for fire egress). Also provide details of interchange between Metrolink and the proposed HSR station option.				
3857												
87	R. Vandenberg	Rhela Consulting		X		AR-B0701A	Stations	Site plan for "unpreferred" alternative at Fullerton Station includes new ped bridge from existing parking structure that improves access to SB Metrolink/Amtrak station as compared to the preferred site plan.				

Mott MacDonald Restricted

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: 15% Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: A=Agreed and will comply/take action. B=Will investigate. C=Disagree for reasons noted in Response/Status Column. D=Will address in next phase.

REVIEWER RESPONSIBILITY									RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE (Provided to OCTA 12/20/19)	RESOLUTION-ACTION ITEM
3858 1	J. Gallardo	OCTA				General	R/W Impacts	From a right-of-way (ROW) perspective, OCTA owns the Orange subdivision south of Fullerton junction. The HSR requires a lot of new property in the segment from Anaheim to Fullerton for the rail infrastructure. Is this ROW acquired by HSR intended to be consolidated into the Orange Subdivision operating ROW owned by OCTA?		D	Yes, HSR intends to operate as a tenant railroad in the So Cal Shared Corridors. Any ROW acquired would likely be consolidated into the Orange subdivision. Agreement to be negotiated as project advances.	
3859 2	N. Barrett	OCTA		X		General	Highway Impacts	At the Katella Avenue NB Off-Ramp, Alts 2 and 2B widen the existing bridge and because of the alignment of the existing bridge columns and the need to keep the same alignment, there is a conflict with the bent #2 column and the rail bridge for HSR. In addition, whereas the new-off-ramp structure in Alt. 2A spans the proposed service road, for Alts. 2 and 2B, there's a slight conflict with the proposed alignment of the service road and the width of the HSR bridge over Douglass Road. The service road could be realigned to avoid both abutment #1 and bent #2, possibly requiring that the bridge over Douglass Road be a little longer.		D	During PEPD design phase, SR-57 alternatives were not available. Lengthening the bridge over Douglass road would require the deck to be expanded, either increasing re-profiling on Douglass or pushing the tracks into conflict with existing SR-57 and the proposed underpass. Coordination will be required in future phase to resolve potential conflicts.	
3860 3	N. Patel	OCTA		X		General	Plan & Profile	There will be Metrolink, Amtrak, California High Speed Rail (CHSR), OCTA 30-minutes trains between Fullerton Station and Anaheim ARTIC Station. The train traffic will be increased for the future based on projections. How is it possible to run all these trains on the proposed tracks? There are only two tracks at certain locations. A modeling shall be carried out to determine the facilities that are needed for the future train services. The modeling is very necessary and will be done prior to any decision by OCTA to approve CHSR project. Any additional improvements necessary to accommodate all train services and required by modeling will be included as a part of the CHSR project.		A	CHSRA have been working jointly with all operators – passenger and freight – that may be impacted by the plans to introduce high-speed services into Southern California. The joint schedule planning and modelling work to date been used to inform development of the Authority's plans as shown in the PEPD and EIR/EIS documents. The investments proposed by the Authority in track layouts and signal system upgrades are sufficient to accommodate the introduction of the proposed levels of high-speed service, whilst still allowing for growth of service levels for Metrolink and Amtrak services consistent with the levels outlined in the State Rail Plan. CHSRA would be happy to provide a briefing to OCTA on the plans developed to date if that is required. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - no modeling provided	This answer appears to be generic. The answer do not make it clear if the modeling included OCTA 30-minutes train service or any other commuter or freight services or emergency situations. Modeling data used for this project shall be submitted for review by OCTA. OCTA will also like to have an independent review, conducted by another consultant (either hired by CHSR or OCTSA), of the data and modeling summary to ascertain that the facilities to be constructed by CHSRA will not require additional right-of-ways to be purchased by OCTA for their future service expansion. OCTA also wants to make sure the proposed two tracks at certain locations will be sufficient for existing and future rail services of all carriers. Does the modeling take into account any disruption to one track as a result of any emergency and still be able to continue with the expected rail services?
3861 4	N. Patel	OCTA		X		General	Plan & Profile	OCTA and other SCRRA member agencies are responsible for providing funding for the maintenance and operation of the Metrolink train services on Metrolink system, especially on the Orange Subdivision. Since it is proposed by CHSR to share the tracks for Metrolink, Amtrak, and CHSR trains, who will maintain and operate the train services? Who will be responsible to pay for the cost of maintenance and operation? Who will maintain the catenary? An agreement or agreements will be necessary to clearly delineate responsibility of each organization.		A	CHSRA plans to run as a tenant railroad on this corridor under agreement with the existing operators and will be responsible for their share of the cost for maintenance and operations. Most likely they will negotiate an agreement with the existing operators to provide the maintenance including for the catenary system. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - no agreements developed yet	Is there a timetable for completing the agreements? Did CHSRA had any preliminary discussions with SCRRA and OCTA for sharing the costs and the mechanism to come to an agreement?
3862 5	N. Patel	OCTA		X		General	Plan & Profile	Since both BNSF and UP has rights to use the track for their freight services on OCTA right-of-way, written approval from both of the freight railroad will be necessary for the revised freight operations. Any modifications to existing Purchase and Sales agreements or any other agreements necessary for the project must be obtained by CHSR prior to OCTA approval of the project.		A	CHSRA is coordinating with both UP and BNSF for future plans to run in So Cal Urban Corridor with all other operators and plans modifications to the infrastructure for increased service and future HSR service. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - modified agreements have not been shared. It seems BNSF is proceeding with projects that support CHRS such as Fullerton 3rd MT and Station Redevelopment.	Can CHSRA provide a summary of what has been discussed and what has been finalized with freight railroads? What steps has been taken to continue with the HSR services if the freight railroads are not in agreement with any of the assumptions made by CHSRA?
3863 6	N. Patel	OCTA		X		General	Plan & Profile	As per SCRRA Grade Separation Guidelines, Section 8.0, it is necessary to preserve the utility of the operating system, and have ability for future expansion of at least one additional track. The proposed grade separation structures shall be designed to provide one additional track.		C	In order to minimize ROW takes and impacts, HSR policy is to only environmentally clearing what is necessary to provide the safe and efficient operation of HSR trains and other operators. This does not preclude future expansion. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - we need to see that SCRRA agrees to this design deviation.	The response does not make it clear if CHSRA is going to follow SCRRA criteria. The preliminary plans and environmental clearance can not be completed unless a decision is obtained in writing from OCTA and SCRRA on their willingness to agree with CHSRA decision not to follow the SCRRA requirement.

3864	7	N. Patel	OCTA		X		General	Plan & Profile	A plan showing the feasibility to locate one additional track in the OCTA right-of-way will be prepared and submitted for acceptance. Any right-of-way necessary for the expansion will be obtained as a part of your project.		D	Current HSR policy is to minimize ROW impacts for a shared corridor from LA to Anaheim. If additional ROW is needed HSR will acquire any ROW required for the project.Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - it does not appear the R/W acquisition accounts for any expansion.	OCTA wants to make sure that their ability to expand the services in the future will not be affected by the introduction of CHSRA services. OCTA can not be held liable for the cost for obtaining right-of-way for future expansion if the existing ROW is used up by CHSRA for their own services. OCTA wants to know at this time what are their liabilities and the plan showing the feasibility for the future expansion will help in understanding this liability.
3865	8	N. Patel	OCTA		X		General	Plan & Profile	Has blended services been accepted in writing by Metrolink, BNSF, UP, Amtrak, and LA Metro? An agreement accepting this type of blended service will be provided to OCTA for review and approval.		A	CHSR has included blended service for So Cal Urban corridor since 2014. It has held coordination meetings with BNSF, UP, Metro and SCRRA. Has previously reached out to OCTA to schedule meetings. ~~CHSR would like to have coordination meetings with OCTA.~~ Agreement to be negotiated as project advances. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - agreement is needed	OCTA can not agree to any plans prepared by CHSRA that are not approved by all affected agencies. It is CHSRA responsibility to obtain approval from all affected agencies prior to making their decision on blended services. OCTA is willing to work with CHSRA if they negotiate with all affected agencies who has inherent rights to operate the rail services based on existing agreements.
3866	9	N. Patel	OCTA		X		General	Plan & Profile	The Technical Working Group (TWG) established by the U.S. Department of Transportation and led by representatives from the Federal Highway (FRA), Federal Transit Administration, and National Highway Traffic Safety Administration recommend grade separations for trains exceeding 100 mph speed. What measures has been taken to meet these recommendations?		A	LA-A corridor will be design up to 110 mph where applicable. CHSR plans to run their high-speed trains at reduced speeds, in the urban corridor, at similar speeds as other passenger trains.	
3867	10	N. Patel	OCTA		X		General	Plan & Profile	Fiber optic line(s) dedicated for Metrolink services for tracks, stations, signals, communications, and PTC services will be designed and constructed as a part of the CHSR project. The design will be coordinated with SCRRA and OCTA.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - design details are still needed	Fiber optic lines are located in OCTA right-of-way under existing agreements with BNSF and fiber optic companies. There are certain requirements that must be met to relocate or replace the fiber optic lines, including ten feet easement area. It is necessary to provide ten feet easement for these lines. The 15% PEPD must determine of there is sufficient room the fiber optic lines in the ROW. If not, provisions has to be made at this time for any other solution.
3868	11	N. Patel	OCTA		X		General	Plan & Profile	The construction of all the improvements between Fullerton Station and Anaheim will adversely affect the operations of the Metrolink, BNSF, and Amtrak trains. In order to minimize the disruption to the existing train service, it may be necessary to run more trans on the Olive Subdivisions. CHSR will prepare a report on the operation of the trains during construction and any necessary modifications to the Olive Subdivision infrastructure. If it is necessary to make changes to existing rail infrastructures on the Olive Subdivision, the changes will be carried out as a part of the CHSR project.		A	Currently, CHSR doesn't intend to run trains on the Olive subdivision, but does intend to improve the infrastructure of the OC Line. Staff would like to discuss this issue with OCTA and SCRRA. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - meetings are still needed to discuss	The 15% PEPD must include the operation plans that affect the existing services. A solution that is acceptable to all affected railroads will be negotiated as a part of the 15% design. It is the CHSR responsibility to come to a solution. OCTA is willing to review and attend any coordination done by CHSR.
3869	12	N. Patel	OCTA		X		GE-A0101	Location Map	What is Tongva Subdivision? Is this separate from SCRRA Subdivision names? What will be the name of the subdivision in Orange County?		D	This is old CAHSR's designation for the LA - Anaheim line segment in their operating documents which is no longer applicable. Will revise as needed. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - cover sheet still says Tongva Subdivision	
3870	13	N. Patel	OCTA		X		GE-B0101	Basis of Design	As per SCRRA's DCM, Section 5.3, the maximum speed in the segment from Fullerton to Anaheim is 90 mph. SCRRA approval is necessary for 110 mph speed in this segment. An exception approved by SCRRA will be provided to OCTA.		A	Design criteria is up to 110 mph (where applicable) but HSR trains will be restricted to speeds of other passenger trains.	comment closed
3871	14	N. Patel	OCTA		X		GE-B0101	Basis of Design	As per SCRRA's DCM, Section 5.4.3, the minimum distance between the main line tracks is 15 feet. The 14'-0" shown in this plan should be revised as per this criteria on OCTA Orange Subdivision.		C	This is driven by constraints and legacy track spacing on the BNSF and does not apply to the OCTA Orange Subdivision. However, we agree track center spacing could be included in future design phase. Note from Avi Shah	
3872	15	N. Patel	OCTA		X		GE-B0101	Basis of Design	Remove Note No. 14 from Basis of Design Summary for OCTA property.		C	Note 14 has been approved by Metrolink and BNSF for use at three other locations where grade-separation of diamond crossings is infeasible. OWL (One way Low Speed) diamonds are also a existing condition. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open	A copy of the agreement from Metrolink and BNSF will be provided to OCTA. OCTA is not in agreement with diamond crossings. All other feasible alternatives will be explored to eliminate diamond crossings.
3873	16	N. Patel	OCTA		X		GE-D6101	Track Schematic	The two tracks between Lewis Street and ARTIC Station and located geographic north are not the New HSR Tracks. They are Metrolink operated tracks. The schematic color is wrong for this segment. Revise the schematic as necessary.		C	The two new tracks are HSR, to be used for over-night storage.	I am not sure if this comment is understood. The main two tracks are Metrolink tracks and it should be shown in light blue color as per legend. The main tracks are Metrolink tracks from Orangethorpe Avenue.
3874	17	N. Patel	OCTA		X		TT-D3025 & ST-G0021	Cross Sections	Section in Drawing TT-D3026 indicates that the distance between the track and the electrical pole is typically 12 feet. Section in Drawing ST-G0021 indicate a distance of only 10'-8". This is confusing and misleading. 12 feet clearance should be used for all cross-sections.		C	10'-8" is required in constrained areas. 12' would incur additional ROW encroachments and HSR policy is to minimize ROW impacts. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - approval of RFSDC required	CAHSR policy is in conflict with minimum requirements. Approval is required if the policy and requirements are in conflict. Any exception to the requirements will be conveyed as a part of the design submittal.

3875	18	N. Patel	OCTA		X		TT-B3001	Typical X-Section	The overhead wire clearance is 25.5 feet. The existing vertical clearances for many of the bridges in the Orange Subdivision are less than this. For example, the vertical clearance for CA-91 bridge 22.45 feet. How do you plan to meet your, CPUC, and SCRRA requirement?		C	As note #4 indicates on sheet TT-B3001, wire height to clear double stack (plate H) clearances on the BNSF is 23'-6", all other areas (which includes the OCTA section) the wire height will be set at HSR standard of 18'-9". Use of a Rigid overhead contact system (ROCS) is also proposed where physical constraints deem it necessary. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open	Orange Subdivision is also used by BNSF. If exception is granted by BNSF in this area, OCTA will be provided with proof of approval from BNSF. Also if an approval from Metrolink to use 18'-9" is obtained, a copy will be provided to OCTA.
3876	19	N. Patel	OCTA		X		TT-D1581 & AR-B0601	Plan & Profile	Only 313 parking spaces are provided at Buena Park Station. Minimum number of 500 parking spaces as required by SCRRA's Design Criteria Manual (DCM) - Section 7.5 (Page 31), will be provided.		D	HSR is only environmental clearing a station design that matches the existing Buena Park station but there sufficient space for more parking which can be coordinated in future design phase. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open	Any exception to Metrolink criteria will be cleared from Metrolink and the approval of exception will be provided to OCTA. The 15% design can not be considered complete if there is not agreement on the design criteria exception.
3877	20	N. Patel	OCTA		X		TT-D1581 & AR-B0601	Plan & Profile	Any required property for the access Road and the parking spaces will be obtained as a part of the California High Speed Train Project. Any and all property agreements necessary for the proposed station facilities will be prepared by CHSR to the satisfaction of the affected cities and OCTA.		A	Property acquisitions needed due to the HSR project will be obtained by HSR. In future phases HSR will draft and negotiate agreements necessary for station facilities. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open	
3878	21	N. Patel	OCTA		X		TT-D1581 & AR-B0601	Plan & Profile	There is a drainage channel on north side of the proposed Buena Park Station. How deep will be the passenger tunnel to avoid the channel? The passenger tunnel will be designed to provide clear view from the existing ground surface.		D	The drainage channel begins west of the pedestrian underpass and therefore at a 15% design level doesn't appear to conflict with the proposed pedestrian tunnel. Future final design will be coordinated with stakeholders.	
3879	22	N. Patel	OCTA		X		TT-D1584	Plan & Profile	All costs related to removal of existing Buena Park Station facilities will be included as a part of the CHSR project.		A	Agree that costs related to removal of existing Buena Park Station facilities will be part of the CHSR project, Agreement to be negotiated as project advances. Note from Avi Shah (HDR) on 1/19/2026: Comment partially addressed - need to see agreement.	
3880	23	N. Patel	OCTA		X		TT-D1584	Plan & Profile	The disposition of the existing parking lot and its future use will be discussed, finalized, and approved by the City of Buena Park and OCTA.	A	D	The PEPD plans include station areas for platforms and parking. Design will be done in future phases in coordination with Buena Park and OCTA. Note from Avi Shah (HDR) on 1/19/2026: Comment partially	
3881	24	N. Patel	OCTA		X		TT-D1587	Plan & Profile	There are series of double slip turnouts around Station SNB 1141+79 and SBN 1142.89. SCRRA does not allow these types of turnouts. Does BNSF accepted these types of turnouts? Please elaborate.		C	This is a grade separation, not a double-slip switch. Please refer to profile, the two passenger tracks will go under the BNSF mainline tracks.	comment closed
3882	25	N. Patel	OCTA		X		TT-D1599	Plan & Profile	Any modifications and constructions to the existing Fullerton Station platform, pedestrian bridge, Harbor Blvd. bridge, and other facilities will be a part of the CHSR project.		A	Agree modifications are part of CHSR Project as shown in the PEPD plans. Note from Avi Shah (HDR) on 1/19/2026: Comment open until coordination is completed.	
3883	26	N. Patel	OCTA		X		TT-D1599	Plan & Profile	An inter-track fences between the Metrolink platforms shall be provided to prevent trespassing.		A	Space has been provided to allow for inter-track fences which will be shown in future design phase. Note from Avi Shah (HDR) on 1/19/2026: Comment open - inter-track fence not shown on track plans	
3884	27	N. Patel	OCTA		X		TT-D1599	Plan & Profile	OCTA spent about 90 million on construction of stations, main line tracks, sidings, signals, communication, and bridges in 1990 to have 30-minute service between Fullerton Station and Irvine Station. OCTA and SCRRA also have a new project to expand Irvine Station for this additional service. There is an existing platform at Fullerton Station dedicated to 30-minute OCTA train service. No provisions has been made to replace this platform and tracks. This will severely affect the future plans of OCTA. A report will be prepared to study the effect of CHSR project on the existing and future services of Metrolink, Amtrak and OCTA's 30-minute train service. Any improvements studied as a part of the study and necessary to meet this requirement will be a included in the CHSR project. OCTA can not approve the proposed design at the Fullerton Station until a very comprehensive report is prepared by CHSR.		A	During development of PEPD record set, HSR operations indicated that all OC intercounty trains will be interlining with CAHSR to Los Angeles. In future phases an operational report will be prepared, shared and coordinated with OCTA and Metrolink and other operators. Note from Avi Shah (HDR) on 1/19/2026: Comment still open	Do not agree with the response. All the modifications necessary at the Fullerton Station to accommodate HSR will severely affect OCTA services. No attempt has been made to address OCTA existing and future services at Fullerton Station. The 15% report must address any and all existing OCTA facilities and any mitigation necessary to continue the services that will be affected by HSR.
3885	28	N. Patel	OCTA		X		TT-D1599 thro TT-1602	Plan & Profile	It appears from the track alignments in these drawings that the Orange County trains will not be able to use the northern most platform at Fullerton Station. Also the 91 line trains may not be able to use the southern platform. Is this the case? Do you have a plan of how to use the platforms at Fullerton Station for Orange County Trains and 91 Trains? What can be used in emergency?		C	At the time of the development of the PEPD, the operational intent of the HSR design between LA-A is to eliminate all existing cross-plant passenger movements that currently cause considerable delays today and in future (The N/B OC cross plant movement at Fullerton being a prime example of this). The PEPD design proposes that OC N/B trains will use the new center platform on the LA-A NB track (or can use the LA-A SB track and southerly platform in case of emergency). 91 trains will have three options to use existing platform on north side as well as both platform faces on new center platform. Due to physical constraints, there is no viable way to provide all the movements described in comment with turnouts that meet track speeds required at this location; however, the proposed layout meets the stated HSR operational intent and provides far greater operational flexibility than exists today. Note from Avi Shah (HDR) on 1/19/2026: Comment still open	Has this plan approved by Metrolink, BNSF, and Amtrak? Provide copy of written approval of this plan from these three agencies to OCTA.

3886	29	N. Patel	OCTA		X		TT-D1600	Plan & Profile	The drawings do not show the locations of railroad wayside signal locations. It appears that there may not be sufficient right-of-way to locate the foundations for the railroad signals. It is suggested that the railroad signal locations be shown in this and other drawings.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance Note from Avi Shah (HDR) on 1/19/2026: Comment still open - not addressed	If there is a need for additional ROW to locate the railroad signals, to meet existing railroad criteria, it should be indicated. How is it possible to obtain environmental clearance when the design could be affected to meet design criteria? Once the environmental clearance is obtained for a project, the design is set. If additional Right-of-ways are required for the project, it may not possible to modify the environmental report. CHSRA will argue, during the design and construction, that the additional ROW is not a part of the past environmental clearance so it is not possible to acquire additional right-of-ways. This will result in inadequate project which will not meet railroad agency design and operation requirements. All such issues shall be resolved at this stage to avoid future problems and prior to this environmental clearance phase and this 15% design.
3887	30	N. Patel	OCTA		X		TT-D1600	Plan & Profile	Where do you plan to locate the railroad signal for the No. 20 turnout located at Station 1308+94.45?		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance Note from Avi Shah (HDR) on 1/19/2026: Comment still open - not addressed	If there is a need for additional ROW to locate the railroad signals, to meet existing railroad criteria, it should be indicated. How is it possible to obtain environmental clearance when the design could be affected to meet design criteria? If additional Right-of-ways are required for the project, it may not possible to modify the environmental report. CHSRA will argue, during the design and construction, that the additional ROW is not a part of the past environmental clearance so it is not possible to acquire additional right-of-ways.
3888	31	N. Patel	OCTA		X		TT-D1601	Plan & Profile	The LA-A SB track location appears to be too close to the property line near Station 1325+00. There is not sufficient room for the CPUC clearance requirements from the property line. How will you resolve this condition?		A	ROW acquisitions will be a part of the DRAFT Environmental document submittal Note from Avi Shah (HDR) on 1/19/2026: Comment still open - not addressed	Understood, however, the plans must show the boundaries of the proposed right-of-way. Revise the plans to show the additional ROW.
3889	32	N. Patel	OCTA		X		TT-D1603	Plan & Profile	The label indicating Ex BNSF Industry Spur tracks appears to be in error. These two are Metrolink tracks at this time.		C	The existing tracks will become the BNSF industrial tracks. Metrolink and HSR will share new tracks as shown on plan.	If this is the case, why these tracks are labeled as existing BNSF tracks? Comment closed
3890	33	N. Patel	OCTA		X		TT-D1603	Plan & Profile	SCRRA does not allow #9 turnouts on the system. The smallest turnout on Metrolink for spur track is #10.		A	Noted. CAHSR is clearing a #9; however, this can be modified in the final the next set of PEPD plans to a #10, but note this is on a spur track.	Comment closed
3891	34	N. Patel	OCTA		X		TT-D1604	Plan & Profile	#11 turnout are not allowed on Metrolink territory. They should be #14 turnouts.		A	Will be changed to #14, but note that this is on a spur track.	Comment closed
3892	35	N. Patel	OCTA		X		TT-D1604 & TT-1605	Plan & Profile	The area on the west side of the tracks between Orangethorpe Avenue and CA-91 was reserved for Anaheim Layover Facility as per Metrolink Service Expansion project. Refer to this project plan and revise these drawings to include the layover facility as designed previously.		D	All OC intercounty trains will be interlining with CAHSR to Los Angeles. HSR does replace the existing storage siding south of the existing location.	Comment closed
3893	36	N. Patel	OCTA		X		TT-D1606 & TT-D1608 & ST-K1421	Plan & Profile	As per SCRRA PTC requirements, a power derail is necessary to connect industry/freight track to the main line track. The connection of the BNSF track at Station 1384+50 and 1413+43.09 shall be revised as per this requirement.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance Note from Avi Shah (HDR) on 1/19/2026: Comment still open - not addressed	
3894	37	N. Patel	OCTA		X		TT-D1619 & GE-B0101	Plan & Profile	No diamonds will be allowed for the UP Tustin Branch. The UP Track should be grade separated or other arrangement will be made that makes it possible to remove the diamonds.		C	Noted - HSR is using the existing OWLS diamond crossing and adding a new track to the west. The OWLS diamonds are in existence today. A grade separation is not viable here. This was presented to UP and HSR also provided copy of the PEPD plans for review. Note from Avi Shah (HDR) on 1/19/2026: Comment still open	A copy of the agreement from Metrolink and BNSF will be provided to OCTA. OCTA is not in agreement with diamond crossings. All other feasible alternatives will be explored to eliminate diamond crossings.
3895	38	N. Patel	OCTA		X		TT-D1621 & TT-D1622	Plan & Profile	The drawings do not show the locations of railroad wayside signal locations. It appears that there may not be sufficient right-of-way to locate the foundations for the railroad signals. It is suggested that the railroad signal locations be shown in this and other drawings.		C	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance Note from Avi Shah (HDR) on 1/19/2026: Comment still open	If there is a need for additional ROW to locate the railroad signals, to meet existing railroad criteria, it should be indicated. How is it possible to obtain environmental clearance when the design could be affected to meet design criteria? If additional Right-of-ways are required for the project, it may not possible to modify the environmental report. CHSRA will argue, during the design and construction, that the additional ROW is not a part of the past environmental clearance so it is not possible to acquire additional right-of-ways.
3896	39	N. Patel	OCTA		X		TT-D1621 & TT-D1622	Plan & Profile	#11 turnout are not allowed on Metrolink territory. They should be #14 turnouts.		D	Will be changed to #14, but note that this is on a spur track. Note from Avi Shah (HDR) on 1/19/2026: Comment still open - plans still show #11 turnouts	
3897	40	N. Patel	OCTA		X		TT-D1623 & TT-D1624	Plan & Profile	An inter-track fence shall be provided between the Metrolink platform and the CHSR track to prevent trespassing.		D	Fence will be provided at back of platform, but is not shown at this level of design. Note from Avi Shah (HDR) on 1/19/2026: Comment still open	
3898	41	N. Patel	OCTA		X		TT-D1623 & AR-B0901	Plan & Profile	Existing Anaheim Station Platform not used by Metrolink and Amtrak will be removed as part of the CHSR project.		D	Agree. This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance	

42	N. Patel	OCTA		X		AR-B0601	Plan & Profile	A switchback ramps used for Buena Park Station center platform shall be avoided to provide more space for platform circulation.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance	
43	N. Patel	OCTA		X		TT-D1581 & AR-B0601	Plan & Profile	Have you prepared, submitted, and obtained approval of a level-entry boarding report for FTA and FRA for the new Buena Park Station? The draft report shall be approved by SCRRA and OCTA prior to submittal to FTA and FRA.		D	Metrolink stations that will be relocated by HSR will be designed further in future design phases when level boarding requirements will be followed.	
44	N. Patel	OCTA		X		TT-D1599 & AR-B0701	Plan & Profile	Have you prepared, submitted, and obtained approval of a level-entry boarding report for FTA and FRA for the Fullerton Station? The draft report shall be approved by SCRRA and OCTA prior to submittal to FTA and FRA.		A	HSR Trains will be level boarding not requiring a report at this time. Metrolink stations that will be relocated by HSR will be designed further in future design phases when level boarding requirements will be followed.	
45	N. Patel	OCTA		X		ST-K1411	Plan & Profile	The bridges span for Orangethorpe Avenue are 56' and 63'. The section on this drawings indicates PC/PS box girders for superstructures. As per SCRRA Grade Separation Guidelines, Table 8.1, steel beam superstructure is necessary. The bridge design will be changed to use steel beams.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance.	The drawings will be revised to show steel girders, not concrete girders.
46	N. Patel	OCTA		X		ST-K1411	Plan & Profile	Refer to PSR prepared by OCTA for this street grade separation and revise this concept plan unless this concept is better.		D	At such time that HSR is working on a supplemental EIR/EIS for LA-A, if the grade separation has been CEQA cleared in time to be incorporated, then HSR will NEPA clear it in the supplemental EIR/EIS.	
47	N. Patel	OCTA		X		Grade Separation General Plans	Plan & Profile	Traffic forecast for train volume on this drawing does not account for 30-minutes train service between Fullerton and Irvine. The forecast will be changed. All tracks, stations, and other facilities design will be revised if they are based on the criteria shown here which needs revisions.		D	During development of design, HSR operations indicated that all OC intercounty trains will be interlining with CAHSR to Los Angeles.	Provide modeling information to show if this will work.
48	N. Patel	OCTA		X		Grade Separation General Plans	Plan & Profile	What is the basis for 118 future freight trains forecast?		D	At time of design, this was just used as a general forecast to provide basis of structural design. Will update data obtained from operators and as shown in the environmental documents.	
49	N. Patel	OCTA		X		ST-K1451	Plan & Profile	The bridges span for La Palma Avenue are 56'-8" and 70'. The section on this drawings indicates PC/PS box girders for superstructures. As per SCRRA Grade Separation Guidelines, Table 8.1, steel beam superstructure is necessary. The bridge design will be changed to use steel beams.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs with coordination with key stakeholders after environmental clearance	The drawings will be revised to show steel girders, not concrete girders.
50	N. Patel	OCTA		X		CV-T1521	Plan & Profile	Refer to PSR prepared by OCTA for this street grade separation and revise this concept plan unless this concept is better.		D	At such time that HSR is working on a supplemental EIR/EIS for LA-A, if the grade separation has been CEQA cleared in time to be incorporated, then HSR will NEPA clear it in the supplemental EIR/EIS.	
51	N. Patel	OCTA		X		CV-T1581	Plan & Profile	The Douglas Road underpass will be lowered by about 9 feet under the existing bridge foundation. The structural capability of the existing bridge foundation to withstand the proposed depth will be analyzed and any necessary modifications necessary will be included as a part of the CHSR project.		D	Agree. This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance	Once the environmental clearance is obtained for a project, the design is set. If additional Right-of-ways are required for the project, it may not possible to modify the environmental report. CHSRA will argue, during the design and construction, that the additional ROW is not a part of the past environmental clearance so it is not possible to acquire additional right-of-ways. This will result in inadequate project which will not meet railroad agency design and operation requirements. All such issues shall be resolved at this stage to avoid future problems and prior to this environmental clearance phase and this 15% design.
52	N. Patel	OCTA		X		UT-D1609	Plan & Profile	Is there any study done as a part of this project that justify the decision to keep at-grade crossings or provide a pedestrian overhead?		D	A letter was received from the City of Anaheim to the HSR Authority, dated Nov. 3, 2014, defined what action to be taken at each road/rail crossing	Please provide a copy of the letter to OCTA.
53	N. Patel	OCTA		X		TN-C3587	Section	Is railing or fencing necessary at the top of the trench structure walls?		D	Railing and fencing can be accommodated in future designs	
54	M.Shaver	OCTA		X		RW-M1581 & RW-M1582	R/W Impacts	3ft acquisition shown on Section DD-DD (LT side) on TT-D3021 may not be adequate for footing dimensions of Type 1 wall for station range shown in Section DD-DD. See Ret Wall plans ST-G1089 & ST-G1090. Avoid existing parking spaces. Consider Type 3 wall.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance	
55	M.Shaver	OCTA		X		General	R/W Impacts	Not all TCE's are shown. Recommend revisit R/W Requirements at PE (30%) and later at 60% to define TCE's. Also Contractor access, material delivery access, staging/laydown and vehicle maint areas to be shown in later milestones.		D	Agree. This will be done in a future design phase.	
56	M.Shaver	OCTA		X		General	Utilities	Significant lead times required for planning, coordination, negotiation, and design of relocation plans for stakeholder utilities. Include impacts in project schedule		D	This will be handled in future project phase.	
57	M.Shaver	OCTA		X		RW-M1592	R/W Impacts	R/W impact due to prop ret wall SBN 1201+50 RT. Not shown		D	Based on a 15% design level, the prop ret wall falls within BNSF and public ROW. Future project phases will finalize design and ultimate ROW requirements.	
58	M.Shaver	OCTA		X		RW-M1598	R/W Impacts	R/W Requirements for prop 10" sewer + MH at 1287+00 RT. APN 032-251-42 (ignore if Public R/W)		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	

59	M.Shaver	OCTA		X		RW-M1604	R/W Impacts	Insufficient R/W Requirements for prop 12" sewer SBN 1361+70 RT. APN 073-100-39 (Mas' Chinese Islamic Restaurant)		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
60	M.Shaver	OCTA		X		RW-M1616	R/W Impacts	Wall shown on either side of Ball Rd (UT-D1616), R/W Requirements here?		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
61	M.Shaver	OCTA		X		RW-M1616	R/W Impacts	SD from catch basin in parking lot on Ball Rd - SOC 1517+25, 110ft LT. See UT-D1616; R/W Requirements here? This is temp environmental impact.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
62	M.Shaver	OCTA		X		CV-T1276	Grade Sep	Potential impact to existing pump station from prop Ret Wall at back of sidewalk at 39+00 RT Dale St. See also Section D CV-T3271.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
63	M.Shaver	OCTA		X		CV-T1282	Grade Sep	Potential impact to existing building from prop Ret Wall at 73+25 RT Artesia St. (SBN 1161+75 RT). Eliminates ground floor access to existing industrial building from Artesia side of building. Will City Planning Dept. allow face of building 2 ft off City R/W? See also Section D CV-T3281. Check wall proximity to building footing to confirm there is enough room to locate wall so close to existing building.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
64	M.Shaver	OCTA		X		CV-T1282	Grade Sep	Potential impact to existing building from prop Ret Wall at 74+50 RT Artesia St. (SBN 1163+00 RT). Impacts Arteisa side of existing industrial building. See comment No 21 above. See also Section D CV-T3281.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
65	M.Shaver	OCTA		X		CV-T3411	Grade Sep - Cross Sections	Prop ret walls are shown abutting exist/prop City R/W. Consider dimensions of wall footings when acquiring R/W. Typical all locations where walls are planned to be located close to R/W.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
66	M.Shaver	OCTA		X		UT-Y1416	Grade Sep - Utilities	R/W requirements (util easement or other) needed for prop realignment of 12 in sewer through restaurant property (and other properties?) at NW quadrant Orangethorpe and RR R/W? SOC 1360+50 RT.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
67	M.Shaver	OCTA		X		UT-Y1456	Grade Sep - Utilities	R/W requirements (util easement or other) needed for prop realignment of 10 in sewer through private property NW quadrant La Palma St and RR R/W? SOC 1406+00 RT. Missing RW Impact sheet covering properties along La Palma St; e.g. between Pauline St and N. Sabina St.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
68	M.Shaver	OCTA		X		CV-T1511 & RW-M1762	R/W Impacts	R/W requirements shown on RW-M1762 don't match the property take areas shown on CV-T1511. NW quadrant Vermont Ave and S. Dakota St. See also CV-T1513 along S Dakota St		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
69	M.Shaver	OCTA		X		RW-M1762 & UT-Y1516	R/W Impacts	R/W requirements shown on RW-M1762 don't match the sewer alignment on UT-Y1516. At cul-de-asac north of Olive Elementary School.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
70	M.Shaver	OCTA		X		RW-M1761 & CV-T1517	R/W Impacts	R/W requirements shown on RW-M1761 don't seem to cover the ret wall at 21+00 RT Vermont Ave. See CV-T1517.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
71	J. Lee	OCTA		X		General		Upon entry into Orange Sub where tracks are shared between various services, how will PTC and other safety considerations be addressed?		A	The current hand-off of dispatching will continue but with modernized system to handle new train volumes.	
72	J. Lee	OCTA		X		General		Has HSR studied risks associated with high speed derailments in the shared corridor with adjacent rail operations and shared tracks?		A	CHSR trains will be traveling at the similar speed as other operators and will not be traveling at high speeds in this corridor.	
73	J. Lee	OCTA		X		TT-D1599	Plan & Profile	How will the ped bridge across Harbor be modified to accommodate both passenger boarding/alighting and serves as ped bridge to connect to parking structure		D	This will be determined in future design phases; however, the 15% PEPD is proposing that the existing ped bridge be reconstructed such that the new platform also serves as ped bridge to the parking structure.	
74	J. Lee	OCTA		X		TT-D1599	Plan & Profile	The pick up / drop off area along Walnut Ave will be removed, and it appears there will be new retaining walls along Walnut, this will impact passenger access from Walnut Street.		C	A new pedestrian underpass is proposed that will provide access from Walnut	
75	J. Lee	OCTA		X		TT-D1600	Plan & Profile	The existing turnback track is on OCTA ROW is being displaced by new HSR tracks in it's place, where will the turnback track be relocated to serve Orange County Line?		D	During development of design, HSR operations indicated that all OC intercounty trains will be interlining with CAHSR to Los Angeles. Will coordinate as project advances.	
76	J. Lee	OCTA		X		TT-D1604	Plan & Profile	The identified Ex BNSF Industry Tracks are actually SCRRA ML #1 and #2		D	Correct, SCRRA will operate shared with HSR on the new tracks adjacent to the existing.	
77	J. Lee	OCTA		X		TT-D1605	Plan & Profile	Please note the proposed BNSF Industry Track extension are in both OCTA and private ROW		D	Noted	

78	J. Lee	OCTA		X		TT-D1608	Plan & Profile	Why is BNSF Industry Track extended within OCTA ROW?		D	At time of PEPD preparation, this to provide additional storage capacity for industry and to allow ability of BNSF to switch industry off of mainline tracks thus eliminating existing operational conflicts. Necessity of this arrangement will be further evaluated in future design phases.	
79	J. Lee	OCTA		X		TT-D1609	Plan & Profile	The proposed HSR track configuration limits OCTA/SCRRA future growth and expansion		D	The HSR plan to share the tracks in the corridor minimizes impacts to the community in an already constrained corridor where potential for growth is limited. However, modernization of the signal system will provide shorter headways for all service providers. Will coordinate as project advances.	
80	J. Lee	OCTA		X		TT-D1613	Plan & Profile	Is the City of Anaheim agreeable to the closure of South Street at-grade crossing?			A letter from City of Anaheim, dated Nov. 3, 2014 requested closure of South St. and Sycamore. Need for Ped. grade separation only.	
81	J. Lee	OCTA		X		TT-D1617	Plan & Profile	Will SCRRA be allowed to utilize the HST storage yard in OCTA ROW? If exclusive to HSR use, this proposed track configuration does not allow for any OCTA/SCRRA future growth and expansion		D	A configuration can be considered in future design phase that improves sharing facilities. Will coordinate as project advances.	
82	J. Lee	OCTA		X		TT-D1621	Plan & Profile	The proposed HSR track configuration is different from the 30% grade separation design approved by the City, OCTA/SCRRA, and HSR where two tracks are for SCRRA services with space for a third track and one for HSR.		D	HSR plans to share tracks in the corridor. A configuration can be considered in future design phase that improves sharing the facilities. Will coordinate as project advances.	
83	J. Lee	OCTA		X		AR-C1701	Plan & Profile	How will the fare gates function with passengers coming in from Harbor Blvd stairs as both Amtrak and Metrolink service not verifying fares until after boarding?		D	Station design details will be developed in future design phase.	
84	J. Lee	OCTA		X		AR-B0601	Plan & Profile	The parking demand projection is 1,000 spaces by 2030, the proposed 313 stalls is not sufficient for the future service		D	As indicated on sheet, HSR is only clearing a design that matches existing current station. But the amount of space that is being cleared allows for additional expansion. Coordination of future number of parking spaces will be done in a future design phase.	
85	J. Lee	OCTA		X		AR-B0701	Plan & Profile	Reminder to transition platform height from HSR to Metrolink/Amtrak (15" ATR) if different for level boarding.		D	Transitions between platform height will be developed in future designs. HSR platform is 51" high	
86	J. Lee	OCTA		X		AR-J1901	Plan & Profile	Will HSR allow the service road to be used as a kiss and ride area for all passengers?		D	This will be coordinated and handled in future project phase.	
87	J. Lee	OCTA		X		RW-M1599 to RW-M1624	R/W Impacts	Please verify ROW information presented from Fullerton Station to Anaheim Station. Most of the ROW information within the Orange Sub is not accurately shown.		D	Based on a 15% design level, the proposed ROW requirements are sufficient. Future project design phases will finalize the ultimate ROW requirements.	
88	J. Lee	OCTA		X		CV-T1527	Plan & Profile	Previous grade separation study prepared for Ball Rd shows two track alignment to the west of OCTA ROW to accommodate a future bridge and track with expansion of service. The proposed track and bridge alignment limits OCTA's future service expansion		D	In order to minimize ROW takes and impacts, HSR policy is to environmentally clear what is necessary to provide the safe and efficient operation of HSR trains and other operators with minimal impacts to communities. This does not preclude future expansion or revised designs that will be coordinated in future design phase.	
89	J. Lee	OCTA		X		CV-T1416	Grade Sep	Previous grade separation study prepared for Orangethorpe Ave shows two mainline tracks being realigned to the east edge of OCTA ROW and other modifications including the Kimberly-Clark lead, Anaheim layover track, and freight siding track.		D	In order to minimize ROW takes and impacts, HSR policy is to environmentally clear what is necessary to provide the safe and efficient operation of HSR trains and other operators with minimal impacts to communities. This does not preclude future expansion or revised designs that will be coordinated in future design phase.	
90	J. Lee	OCTA		X		General		For all grade separations, please show the proposed shoofly tracks and associated property impacts. Please also identify how these grade separations will be constructed and how it will be phased. Will each crossing be closed during construction with detours or a bypass road be constructed?		D	Shoofly designs are not part of HSR PEPD 15% design scope; however, ROW takes shown allots space for them. It is proposed that each crossing will be closed on the roadway side, but phased such that adjacent grade separations are not closed at the same time.	
91	J. Lee	OCTA		X		General		Please provide HSR vehicle dynamic envelope for SCRRA review to ensure compatibility with existing operating conditions		D	HSR will operate within the current railroad operating conditions at speeds restricted to other passenger services and not at high speeds.	
92	J. Lee	OCTA		X		General		Please coordinate with OCTA/SCRRA on the proposed commuter track alignment in Orange County, specifically how existing and future improvements will be accommodated		A	Coordination is occurring and will continue until HSR operates in the corridor.	
93	J. Lee	OCTA		X		General		Can HSR share the rail modeling performed with OCTA/SCRRA to understand how the proposed improvements and any future improvements could be accommodated within the Orange Subdivision		A	Yes, HSR will meet with OCTA and share the modeling when available.	
94	J. Lee	OCTA		X		General		State College Grade Separation is not shown in PEPD Vol 3. Is HSR assuming the project will be completed by the others before the LA to Anaheim segment begins construction?		D	Stage College based on the existing 35% PSE will now be included in the final HSR PEPD plans. HSR initially assumed that it will be completed by others but after further discussion with the City, HSR will now include it in the final PEPD Submittal.	

22.34 Response to Submission 013868 (Judith Trujillo, Orange County Transportation Authority, Feb 3, 2026)

22.34.1 3639

The California High-Speed Rail Authority (Authority) acknowledges Orange County Transportation Authority's (OCTA) status as a member of the Southern California Regional Rail Authority (SCRRA) Joint Powers Authority. The commenter previously submitted comments to the Authority on the Administrative Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS), Preliminary Engineering for Project Definition (PEPD), Supplemental Alternatives Analysis, and Revised Notice of Intent/Notice of Preparation. The commenter has submitted these comments again on the Draft EIR/EIS. The Authority has coordinated regularly with OCTA throughout the development of the Draft EIR/EIS, and has discussed the concerns and comments included in the attachment.

22.34.2 3640

The commenter refers to "additional detail provided in Attachment B." The Authority has reviewed the attachments provided by OCTA. Note that there are several pages labeled Attachment A and B, which are attachments to past correspondence between OCTA and the Authority. This includes a comment log provided during the agency's review of the Administrative Draft EIR/EIS. The Authority made revisions, as appropriate, in response to OCTA's previously submitted Administrative Draft EIR/EIS comments, which were included in the Draft EIR/EIS that was circulated for public review. As indicated by the commenter, any comments from the review of the Administrative Draft EIR/EIS that appeared not to be addressed in the published Draft EIR/EIS were reiterated (resubmitted) as current comments. Current comments are delimited and addressed as comments #3650 through #3951 below. Given the above, the Authority did not provide individual responses for the resolved Administrative Draft EIR/EIS comments that were resubmitted in this comment letter from the agency for informational purposes. For more information on the topics raised by the previous Administrative Draft EIR/EIS comments, refer to the applicable chapter or environmental section of the Draft EIR/EIS.

22.34.3 3641

Refer to Standard Response LAA-Response-Chapter 2 Alt-01: Alternatives Selection and Evaluation Process and Identification of the Preferred Alternative, in Chapter 18, Standard Responses.

Refer to Standard Response LAA-Response-Chapter 1 P&N-01: Project Benefits, in Chapter 18.

The comment incorrectly states that the alternatives would not align with the intent of the Authority's enabling legislation or provide true high-speed rail (HSR) service. The Shared Passenger Track Alternatives are fully consistent with the California High-Speed Rail Act (Public Utilities Code Section 185000 et seq.), which directs the Authority to develop and implement intercity HSR service that is integrated with the state's existing intercity rail and bus network. The Shared Passenger Track Alternatives would directly connect to the Phase 1 statewide HSR system between San Francisco and Los Angeles/Anaheim, linking Anaheim with the major metropolitan areas of California on a reliable, electric-powered train system.

Relying on slower speeds and reduced service levels in the Los Angeles to Anaheim Project Section (project section) does not undermine the purpose of the statewide HSR system or provide redundant passenger service, as the comment suggests. As described in Chapter 1, Project Purpose, Need, and Objectives, the purpose of the statewide HSR system is to provide a reliable, electric-powered train system that links the state's major metropolitan areas and delivers predictable and consistent travel times. As described in Chapter 2, Alternatives, for most of the statewide HSR system, HSR trains would operate on dedicated and fully grade-separated tracks, allowing for high speeds, but the dense, urban environment in this project section primarily within an existing rail corridor involves a blended system. HSR trains would share new and upgraded tracks with passenger and freight rail currently operating in the Los Angeles – San Diego – San Luis Obispo Rail Corridor (LOSSAN Corridor) and would travel at speeds similar to the corridor's existing Metrolink and Amtrak trains, but would provide passengers a one-seat ride from San Francisco to Anaheim. Although the HSR trains

in the project section would not be able to operate at as high of a speed as HSR trains in the less-urban areas of the HSR system, the project section provides multiple other benefits by connecting the statewide HSR system from Los Angeles to Orange County.

The Authority has evaluated a range of alternatives for the project section, as detailed in Chapter 2 of the Draft EIR/EIS. The Authority's alternatives evaluation criteria consider not only cost and constructability but also impacts on the environment and surrounding communities, as well as ability to achieve the project's purpose, need, and objectives. All alternatives eliminated from further study were considered against all these criteria, which is documented in the various alternatives analyses and impact assessment reports, as described in Section 2.5, Alternatives Considered During Alternatives Screening Process.

The Shared Passenger Track Alternatives would facilitate multiple improvements for all operators within the corridor, including Metrolink and Amtrak. Overall, the blended system design allows for more efficient operations and minimizes potential conflicts between freight and passenger trains.

22.34.4 3642

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

The commenter states that the permanent infrastructure would result in a loss of flexibility. Even though an overhead contact system (OCS) and HSR layover tracks would be added to the corridor, these would not restrict the use of the existing tracks, which would remain in place. They would also not preclude the development of other planned projects within the corridor, such as additional grade separations in Anaheim.

The Draft EIR/EIS evaluates potential temporary impacts on freight and passenger rail operations during construction under Impact TR-8 in Section 3.2.6.3, Project Impacts. For the new grade separations at State College Boulevard and Katella Avenue, construction would be phased to minimize the effects on freight and passenger rail operations and ensure access is available throughout construction. The existing tracks would be relocated onto temporary shoofly tracks so that excavation can occur under the proposed bridges, and short-term weekend closures may be required to tie the tracks into the mainline tracks. On completion of the new mainline tracks, the temporary shoofly tracks would be removed.

22.34.5 3643

The commenter asserts that station-related impacts are not fully addressed in the Draft EIR/EIS but does not provide specific examples of how the Draft EIR/EIS fails to address station-related impacts that would allow for a more specific response. The Draft EIR/EIS evaluates potential impacts at stations along the project corridor in accordance with the requirements of the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA). Refer to Section 3.2, Transportation, of the Draft EIR/EIS for the Authority's analysis of potential impacts at stations related to parking loss. Refer to Section 3.11, Safety and Security, of the Draft EIR/EIS for the Authority's analysis of potential impacts at stations related to emergency access. With respect to passenger circulation and compliance with Americans with Disabilities Act standards, refer to the "Platform Accessibility/ADA" discussion on the Authority's Safety webpage at https://hsr.ca.gov/project-overview/safety/. For the Draft EIR/EIS's analysis of construction impacts that could occur at stations along the project corridor, refer to the impact statements under the Construction Impacts heading in each environmental section of the Draft EIR/EIS.

The Authority will coordinate with stakeholders as the project design advances, including the City of Anaheim. Additionally, in December 2020, the Authority and the City of Anaheim executed a Memorandum of Understanding (MOU) specifically regarding the HSR station design at Anaheim Regional Transportation Intermodal Facility (ARTIC). The 2020 MOU formalized the commitment by the Authority and City of Anaheim to work together to accommodate HSR passengers within the

existing ARTIC facilities and parking supply and acknowledges that modifications to existing facilities and infrastructure may be needed in and around ARTIC, including parking facilities, vehicular circulation and access, passenger circulation and access, and any other necessary changes. The 2020 MOU additionally formalizes the Authority's commitment to collaborate with other parties as it relates to planned development within the Platinum Triangle. The commitment of the Authority and City of Anaheim to work together will ensure that development of the project section properly accounts for Anaheim initiatives.

22.34.6 3644

Section 1.1.5, Lead Agencies, Cooperating Agencies, and Responsible Agencies, in Chapter 1 and Table 2-24 of Chapter 2 of the Draft EIR/EIS identify OCTA as a CEQA responsible agency. As detailed in Table 2-24, the Authority would obtain approval for construction and use within OCTA right-of-way and in coordination with its passenger operations in the project corridor.

The designation of a cooperating agency under NEPA is at the lead agency's discretion. The Authority has elected not to designate OCTA as a cooperating agency.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.7 3645

Section 3.19, Cumulative Impacts, of the Draft EIR/EIS analyzes the potential cumulative impacts of implementing the Shared Passenger Track Alternatives in combination with past, present, and reasonably foreseeable future actions and projects, including those related to freight growth. As discussed in Section 3.19.4.1, Transportation, of the Draft EIR/EIS, the High Desert Operational Efficiency Project, sponsored by the California Department of Transportation (Caltrans), would provide sufficient staging capacity for freight during HSR project construction and operation. Freight trains would be staged outside of the LOSSAN Corridor and would be scheduled so they are in the correct operating window when they reach Fullerton Junction, minimizing delays for all passenger and freight operators in the corridor, including those with operations in the northern portion of Orange County.

Additionally, as discussed under Impact RG-2 in Section 3.18, Regional Growth, of the Draft EIR/EIS, the project components, including, but not limited to, the new fourth mainline track and other freight and passenger rail improvements, have been designed to accommodate only existing operations and planned operations already anticipated by the Authority and other operators and agencies. The project would include removal of existing BNSF Railway (BNSF) storage and support tracks throughout the project corridor, which would be replaced adjacent to the existing BNSF Los Angeles Intermodal Facility. However, none of the proposed storage and support tracks would be used for loading or unloading at the intermodal facility. The latter activities are conducted in a different part of the intermodal facility, and the affected intermodal container parking is being replaced with a similar acreage for parking. Accordingly, additional intermodal freight activity is not anticipated because of these changes. Therefore, the project components would not indirectly induce freight growth or truck traffic, including in north Orange County communities.

22.34.8 3646

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-01: Alternatives Selection and Evaluation Process and Identification of the Preferred Alternative, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-05: Grade Separations, in Chapter 18.

As discussed in Chapter 2 of the Draft EIR/EIS, the early action projects are project components of both Shared Passenger Track Alternatives. The early action projects identified in the Draft EIR/EIS include the State College Boulevard grade separation. For early action projects evaluated in the Draft EIR/EIS, local agencies may rely on the Final EIR/EIS and may implement these projects in advance of the HSR system as standalone projects.

22.34.9 3647

The Draft EIR/EIS evaluates continuous permanent impacts on freight and passenger rail system capacity during operations under Impact TR-15 in Section 3.2 of the Draft EIR/EIS. This evaluation includes consideration of existing and future Metrolink and Amtrak services, as well as planned investments of rail operators and agencies along the project corridor. As discussed under Impact TR-15, the Authority conducted operational analysis in 2023 to determine the theoretical capacity of the corridor and found that implementation of HSR would not put any constraints on the current passenger operator agreements within the corridor or preclude plans for growth identified in the 2018 California State Rail Plan. The 2023 analysis included consideration of Metrolink and Amtrak trains and found that, accounting for projected train volumes and the addition of the fourth mainline track, implementation of HSR would not put any constraints on the current passenger operator agreements within the corridor or preclude plans for growth identified in the 2018 California State Rail Plan.

Dispatching responsibilities would be similar to current responsibilities. Operating agreements with all parties will be finalized as the design progresses.

22.34.10 3648

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

22.34.11 3649

Refer to Standard Response LAA-Response-Chapter 5 COMMUNITY-01: Need for Analysis of Impacts on Minority and Low-Income Communities, in Chapter 18.

Chapter 5, Community Impacts, is included in the Draft EIR/EIS for informational purposes and as documentation of the Authority's compliance with state law, federal civil rights law, and its own adopted policies. The intent of Chapter 5 of the Draft EIR/EIS is to evaluate whether any minority or low-income communities would experience disproportionately high or adverse project effects. Section 5.3.4, Methods for Impact Analysis, describes the methodology of this analysis. Chapter 5's analysis builds on the analyses in Chapter 3, Affected Environment, Environmental Consequences, and Mitigation Measures, such as Section 3.3, Air Quality and Global Climate Change. Each section of Chapter 3 evaluates impacts on all properties within the resource study area particular to that topic. Chapter 5 examines whether any of these impacts would disproportionately affect minority or low-income communities.

The project section would use fully electric multiple unit trains, with power distributed through the OCS. HSR locomotives would not require combustion of fossil fuels along the project alignment; therefore, there would be no direct combustion emissions that could cause substantial health concerns, such as asthma or other respiratory diseases. Regarding analysis of air quality impacts and health effects, refer to Impact AQ-7, Impact AQ-8, and Impact AQ-15 in Section 3.3 of the Draft EIR/EIS.

Refer also to the responses to comments #0541 in Section 22.13, Response to Submission 013785 (Jivar Afshar, South Coast Air Quality Management District, Jan 30, 2026); and #1501 and #1502 in Section 22.32, Response to Submission 013864 (Chris Schaefer, City of Fullerton, Feb 3, 2026), in this chapter.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.12 3650

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

As described in Section 3.2, the Authority will incorporate TR-IAMF#13, Stakeholder Coordination with Transportation Agencies, which requires the Authority to work closely with all agencies that provide freight and passenger rail services and bus services, or maintain operating rights within the corridor, to ensure that the design, construction, and operation of the project section do not adversely affect existing and planned rail service. The Authority will continue to coordinate with OCTA and local

jurisdictions as the project advances to ensure compatibility with other plans and projects along the corridor.

22.34.13 3651

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.14 3652

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.15 3653

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.16 3654

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

Regarding clearances, the Authority developed standards specifically for the project section based on the Authority's program-wide standards, California Public Utility Commission criteria, feedback received from BNSF and Metrolink, and standards used on other rail projects that included electrification of existing railroads. The Authority met with BNSF and Metrolink in April 2019 to discuss OCS clearances. The cross sections included in Volume 3 of the Draft EIR/EIS reflect these standards.

22.34.17 3655

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.18 3656

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.19 3657

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.20 3658

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.21 3659

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.22 3660

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

Section 3.2.6, Environmental Consequences, Impact TR-15 of the Draft EIR/EIS describes how operational modeling was conducted to illustrate that freight and passenger volumes could be maintained within the corridor. Freight train volumes for the No Project Alternative are based on data received from BNSF, with a 2 percent annual growth rate, which is consistent with the 2018 California State Rail Plan, which anticipated growth to compound annually at a rate of 1.7 percent and 2.9 percent for carload and intermodal services, respectively. Based on the Authority's operational modeling, freight trains could operate one train per hour per direction on the electrified tracks, with no effect on overall operations within the corridor. In addition, TR-IAMF#13 requires the Authority to work closely with all agencies that provide freight rail services or maintain operating rights within the corridor to ensure that the design, construction, and operation of the project section do not adversely affect existing and planned freight rail service. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.23 3661

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Section 1.3.4, Los Angeles – San Diego – San Luis Obispo Rail Corridor Improvement Plans, of the Draft EIR/EIS was revised in the Final EIR/EIS to acknowledge the LOSSAN Corridor's role in providing connections and feeder service to support future HSR service to the statewide HSR system. Refer to Section 16.3, Chapter 1: Project Purpose, Need, and Objectives, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS for this revision.

22.34.24 3662

Refer to Standard Response LAA-Response-Chapter 2 Alt-05: Grade Separations, in Chapter 18.

The LOSSAN Program EIR and Metrolink's Southern California Optimized Rail Expansion program both focus on the need to reduce bottlenecks and improve service, primarily through implementing a double-tracked corridor from Los Angeles to Orange County. The LOSSAN Program EIR also proposes four tracks between Los Angeles and Fullerton. Although neither agency's plans propose grade separations at the locations identified in the project section Draft EIR/EIS, the project section is still consistent with their overarching goals of improving rail efficiency in the LOSSAN Corridor. The grade separations would provide meaningful benefits to all operators and surrounding communities, and would support improvements to corridor-wide service reliability. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.25 3663

The Authority will continue to coordinate with OCTA as the designs advance.

22.34.26 3664

Refer to response to comment #3650 above.

22.34.27 3665

Refer to response to comment #3660 above.

22.34.28 3666

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

The commenter refers to Impact TR-15 in Table S-6, and requests additional information be added regarding future agreements. The text in the table summarizes TR-IAMF#13, stating that the Authority will coordinate with the other rail agencies on the future of shared corridor operations; this text appropriately summarizes the intent of the impact avoidance and minimization feature, so Table S-6 was not revised. However, the Authority revised TR-IAMF#13 to clarify the outcomes of the future agreements, including the elements suggested by the commenter. Refer to Section 16.19, Appendix

2-A: Impact Avoidance and Minimization Features, in Chapter 16 of the Final EIR/EIS for these revisions.

22.34.29 3667

Throughout the development of the project section, the Authority has coordinated regularly with the City of Anaheim. In December 2020, the Authority and the City of Anaheim executed an MOU specifically regarding the HSR station design at ARTIC. The Authority has also coordinated regularly with the City of Anaheim and the OCVIBE developers, with several meetings occurring in 2025 that focused on how the HSR project could be implemented in a way that is compatible with the OCVIBE Project. The Authority will continue to coordinate with the City of Anaheim and OCVIBE as the HSR project advances to ensure both projects are compatible.

22.34.30 3668

Section 1.3.9, Metrolink Southern California Optimized Rail Expansion, of the Draft EIR/EIS has been revised in the Final EIR/EIS to state that 30-minute headways are planned. Please refer to Section 16.3 in Chapter 16 of the Final EIR/EIS for this revision.

22.34.31 3669

Section 1.3.10, Metrolink Strategic Business Plan, of the Draft EIR/EIS has been revised per the commenter's suggestion. Please refer to Section 16.3 in Chapter 16 of the Final EIR/EIS for this revision.

22.34.32 3670

A description of contractual operational agreements is included in Section 3.2 of the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.33 3671

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.34 3672

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Details of the stakeholder coordination and agreements are not necessary for completing the Draft EIR/EIS's evaluation of adverse effects on freight and passenger rail. No changes have been made to the Draft EIR/EIS in response to this comment.

22.34.35 3673

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

HSR would not require an exception from 49 Code of Federal Regulations Part 238. Freight and passenger trains, including HSR, would maintain temporal separation, as described on page 2-85 of the Draft EIR/EIS. Although there would be sufficient capacity to allow for one freight train per hour per direction on the electrified tracks, as described in Section 3.2 of the Draft EIR/EIS, Impact TR-15, this would only occur during certain scheduled windows in peak hours in the morning and evening. BNSF would also have access to the electrified tracks in emergency situations, which would be coordinated with the passenger rail operators to ensure there is temporal separation. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.36 3674

The California Department of Water Resources' best available map of the 200-year floodplain (and other geospatial data) does not indicate any 200-year flood areas in the project area. Therefore, the Draft EIR/EIS analyzes the project within 100-year floodplains.

22.34.37 3675

As described in Section 2.4.7, Signaling and Train-Control Elements, of the Draft EIR/EIS, integrating HSR with existing Metrolink Positive Train Control would require further coordination with rail operators in the corridor. Infrastructure sites such as communication towers already exist and could be used by HSR along with existing operators. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.38 3676

Section 3.2 of the Draft EIR/EIS analyzes potential impacts on passenger rail, with reference to the Authority's 2023 Operational Capacity Memo, as well as the inclusion of TR-IAMF#13. The Authority's operational modeling demonstrates that the Shared Passenger Track Alternatives would not affect existing and planned freight and passenger rail capacity. The requested table was not added to the Draft EIR/EIS; more details on the operational modeling are provided in the Authority's 2023 Operational Capacity Memo.

22.34.39 3677

Modifications at Fullerton Junction are described in Section 2.6.3.1, Alignment (pages 2-84 and 2-85). No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.40 3678

Refer to response to comment #3675 above.

22.34.41 3679

Refer to response to comment #3646 above.

22.34.42 3680

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.43 3681

This comment is acknowledged. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.44 3682

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.45 3683

The OCTA transit routes listed and analyzed in Section 3.2 have been updated based on the routes that are existing as of April 2026. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.34.46 3684

The threshold for an impact on passenger rail service is included in Section 3.2.4.5, Method for Determining Significance Under CEQA, of the Draft EIR/EIS on page 3.2-43. The text was revised to state an impact would occur for passenger rail related to conflicts with established plans or decrease in performance. Please refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.34.47 3685

The Authority reviewed Table 3.2-18 and has updated the status of some projects. Please refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for these revisions.

22.34.48 3686

Refer to response to #3674 above.

22.34.49 3687

As described in Section 3.11 of the Draft EIR/EIS, specifically in Impact SS-11, the Authority will incorporate SS-IAMF#2, Safety and Security Management Plan, which requires the contractor to prepare emergency operating procedures, a System Safety Plan, a Security and Emergency Preparedness Plan, and a fire and life-safety program. The Authority will coordinate with local emergency service providers in developing and applying the System Safety Plan and Security and Emergency Preparedness Plan to establish an efficient and coordinated response protocol, systems, and procedures across the multiple agencies that may be involved in responding to safety and security–related incidents. This text was revised in the Draft EIR/EIS to add that the Authority would also coordinate with rail operators and right-of-way owners to ensure that HSR construction and operations are consistent with their safety and security plans. Please refer to Section 16.5.11, Section 3.11: Safety and Security, in Chapter 16 of the Final EIR/EIS for this revision.

22.34.50 3688

Table 3.11-3 was revised per the commenter's suggestion. Please refer to Section 16.5.11 in Chapter 16 of the Final EIR/EIS for this revision.

22.34.51 3689

Refer to response to comment #3687 above.

22.34.52 3690

The distinction between national Amtrak and LOSSAN Rail Corridor Agency–operated intercity Amtrak services is noted in Section 2.8.2, Other Rail Services in the Shared Corridor, of the Draft EIR/EIS. This text is not relevant in the context of the safety and security analysis in Section 3.11. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.53 3691

The PEPD plans included in Volume 3 of the Draft EIR/EIS are intended to define the environmental footprint for environmental analysis based on a 15 percent design level. The environmental footprint includes all property needs outside of the existing railroad right-of-way to accommodate the proposed HSR track and infrastructure, including anticipated access controls and intrusion protection in locations where there are industry tracks and spurs. The PEPD plans in Volume 3 provide a sufficient level of information to assess environmental impacts. Detailed designs for access control, station design, exact track and roadway clearances, walkway locations, railroad signal locations, emergency egress, ballast retainers, platform profiles, and exact utility locations and dispositions will be developed in coordination with stakeholders in later phases of design. The Authority will comply with all relevant laws, regulations, and industry standard practices for design and construction of the project and will coordinate with Metrolink during the next stages of design on any required approvals or exemptions.

22.34.54 3692

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

The Authority is not required to comply with local land use and zoning regulations, such as the Mixed-Use Overlay Zone; however, it has endeavored to design and build the HSR project so that it is compatible with land use and zoning regulations. Consistency with the Platinum Triangle, including

the ARTIC site, is evaluated in Appendix 3.1-A, Regional and Local Policy Inventory and Consistency Analysis, of the Draft EIR/EIS.

22.34.55 3693

Comment acknowledged. Anaheim Municipal Code Chapter 18.20 was considered during development of the Draft EIR/EIS, as reflected in Section 3.13, Station Planning, Land Use, and Development; refer to Table 3.13-1. Refer also to Appendix 3.1-A.

22.34.56 3694

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.57 3695

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.58 3696

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18 for additional information on how the Authority is coordinating with the City of Anaheim regarding ongoing development surrounding ARTIC and maintaining pedestrian connectivity to transit. The Authority will continue to coordinate with the City of Anaheim and stakeholders to ensure the HSR project is compatible with planned development in the area, including the Building Bridges to Transit project and OCTA's mobility hub strategy. Consistency with other regional and local plans is described in Appendix 3.1-A of the Draft EIR/EIS.

22.34.59 3697

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.60 3698

The current crossover design provides adequate flexibility for Metrolink operations at the relocated and modified Metrolink stations. The Authority will continue to coordinate with BNSF and Metrolink on the design and will modify the design, as needed, as the project progresses to ensure optimal operations.

22.34.61 3699

The Authority has conducted an analysis of shared operations within the corridor, including a light maintenance facility (LMF) layout access review, which was shared with other rail operators in the LOSSAN Corridor on March 25, 2024. Given the existing right-of-way constraints of the corridor and the proposed intensity of passenger traffic, the proposed LMF yard layouts are acceptable. As reflected in TR-IAMF#13, the Authority will continue to work with its partners in this corridor as the design progresses to ensure passenger service is not unduly affected by movements to and from the LMF.

22.34.62 3700

The 10.67-foot clearance meets the minimum California Public Utilities Commission clearances. The Authority will coordinate with Metrolink as the design progresses to obtain variances as needed.

22.34.63 3701

Refer to response to comment #3691 above.

22.34.64 3702

The 10-foot clearance is to the new retaining wall. It is expected that a protection wall can fit on the south side, similar to the north side of the crossing.

22.34.65 3703

Refer to response to comment #3691 above.

22.34.66 3704

The crossovers and turnouts depicted on the sheet to which the commenter is referring are existing facilities and are not being modified as part of the project.

22.34.67 3705

Refer to response to comment #3675 above.

22.34.68 3706

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.69 3707

The commenter refers to HYD-IAMF#1, Stormwater Management, with a request to comply with SCRRA design standards and to allow SCRRA and OCTA to review and approve the designs. Note that HYD-IAMF#1 refers to the stormwater management and treatment plan, which will be prepared in compliance with municipal systems and permitting requirements, and does not require the railroad agency's review. Within OCTA's right-of-way, however, the Authority will comply with Metrolink's drainage standards, and provide SCRRA and OCTA an opportunity to review the designs. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.70 3708

The commenter refers to HYD-IAMF#2, Flood Protection, with a request to comply with SCRRA design standards and to allow SCRRA and OCTA to review and approve the designs. Note that HYD-IAMF#2 refers to the flood protection plan, which will be prepared in compliance with state and local requirements and HSR design standards. Within OCTA's right-of-way, however, the Authority will comply with Metrolink's drainage standards, and provide SCRRA and OCTA an opportunity to review the designs. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.71 3709

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18.

The Authority would acquire all property needed for construction and operation of the project prior to construction. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.72 3710

Pursuant to PUE-IAMF#3, Public Notifications, the Authority will coordinate with all affected agencies and utility owners to minimize temporary utility interruptions during construction. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.73 3711

Refer to response to comment #3687 above.

22.34.74 3712

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

The commenter refers to TR-IAMF#8, Construction During Special Events, which deals with roadway capacity during special events. TR-IAMF#9, Protection of Freight and Passenger Rail During Construction, requires the Authority to repair any structural damage to freight or public railways that may occur during the construction period and return any damaged sections to their original structural condition. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.75 3713

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Appendix 2-E, Operations and Service Plan, provides background information on the intended operations and service plan for the statewide HSR system. Recognizing that the HSR system is still at a relatively early stage of the planning process, and that many operational issues remain to be resolved, the appendix summarizes how the system is envisioned to operate at this point in project planning. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.76 3714

The relocated Buena Park Metrolink Station was accounted for within the traffic analysis. The station relocation was not modeled as its own separate project, but rather considered as part of all permanent modifications that would occur under the HSR project. As described in Section 3.2 of the Draft EIR/EIS, no adverse effects on intersections and roadways were identified in Buena Park or surrounding cities in all modeled scenarios.

22.34.77 3715

The Authority will coordinate with the City of Fullerton as the project design advances regarding potential conflicts with existing traffic signal equipment. As described in Section 2.6.3.5, Freight or Passenger Railroad Modifications, of the Draft EIR/EIS, the intersection of Walnut Avenue and Highland Avenue would need to be reconfigured. The change in right-of-way was included within the environmental footprint and, therefore, has been analyzed throughout the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.78 3716

The commenter refers to sheet TT-D1599 from Volume 3.1 of the PEPD, which depicts the Fullerton Metrolink/Amtrak Station. As described in Section 2.6.3.5 of the Draft EIR/EIS, under the Shared Passenger Track Alternatives, the existing pedestrian bridge east of Harbor Boulevard that connects the two side platforms would be removed and replaced by a new pedestrian underpass that connects the existing northern platform to the new center platform and Walnut Avenue to the south, with ramps and stairs providing access. For the Fullerton HSR Station Option, as described in Section 2.6.6.2, High-Speed Rail Station Option: Fullerton, two new pedestrian bridges would be added to connect existing Metrolink facilities with new HSR facilities. One new pedestrian bridge would be west of Harbor Boulevard, connecting the existing Metrolink parking structure on the north to the new HSR parking structure on the south. The second pedestrian bridge would be just east of Malden Avenue, connecting the existing Metrolink parking structure to the HSR station building on the south.

22.34.79 3717

The maximum allowable speeds are dictated by the host railroad. The Authority will coordinate with host railroads as the designs progress. Refer to response to comment #3641 above.

22.34.80 3718

The Authority will coordinate with host railroads as the designs progress.

22.34.81 3719

Refer to response to comment #3648 above.

22.34.82 3720

The PEPD plans are intended to define the environmental footprint for environmental analysis at a 15 percent design level. The PEPD plans depict the existing right-of-way in pink shading. Other shaded-in areas represent proposed acquisitions for the project. More detailed designs will be developed in coordination with stakeholders as the designs progress. Refer to response to comment #3691 above.

22.34.83 3721

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

Regarding crossovers, refer to response to comment #3698 above.

Regarding the HSR LMF yard lead, refer to response to comment #3699 above.

With respect to the viability of Fullerton Junction, the Standard Responses referenced above address future operations analysis and coordination with rail operators to ensure final operations are compatible with existing and planned rail services in the corridor.

22.34.84 3722

Refer to response to comment #3691 above.

22.34.85 3723

Refer to response to comment #3700 above.

22.34.86 3724

Refer to response to comment #3702 above.

22.34.87 3725

Refer to response to comment #3703 above.

22.34.88 3726

Refer to response to comment #3704 above.

22.34.89 3727

The exact clearances will depend on construction methods. If the contractor decides to build with a “top-down method,” the vertical clearance will remain at 15.5 feet. If falsework placement is selected, the contractor will be required to obtain vertical clearance approval from the local jurisdiction.

22.34.90 3728

Refer to response to comment #3691 above.

22.34.91 3729

The proposed widening of the Beach Boulevard bridge would largely avoid conflicts with daily operations on the three existing mainline tracks; however, temporary closures could be required, as would be typical for any railroad construction. Section 3.2 of the Draft EIR/EIS sets forth TRAN-MM#6, Prepare Track Construction Work Window Plan, which will reduce adverse effects on freight and passenger rail services during project construction by requiring the Authority to coordinate with freight and passenger rail agencies and operators to identify specific work windows for track construction activities that minimize disruption to freight and passenger rail services within the project

corridor to the maximum extent feasible. Temporary closures would be coordinated with BNSF in the next phases of design.

22.34.92 3730

Most construction work could be completed under “Form B” work windows and thus not affect operations on the existing three mainline tracks. “Form B” work windows are approved work windows where freight and passenger rail trains and on-track equipment movements can be prohibited from entering the defined limits of a track segment. Refer to response to comment #3729 above.

22.34.93 3731

Refer to response to comment #3727 above.

22.34.94 3732

The proposed widening of the Dale Street bridge would largely avoid conflicts with daily operations on the three existing mainline tracks. Refer to response to comment #3729 above.

22.34.95 3733

The exact clearances will depend on construction methods. The contractor will be required to obtain vertical clearance approval from the local jurisdiction, as needed.

22.34.96 3734

Refer to response to comment #3691 above.

22.34.97 3735

Refer to response to comment #3691 above.

22.34.98 3736

The existing single-track bridge that is being referred to on sheet ST-K1311 is currently used only to store railroad cars; it is not a mainline track. The Euclid Street bridge is not anticipated to affect existing railroad operations, because it is sufficiently clear of the mainline tracks.

22.34.99 3737

Refer to response to comment #3733 above.

22.34.100 3738

The Authority acknowledges the proposed platform structure at this location. This comment does not address the sufficiency of the Draft EIR/EIS, nor does it suggest edits to the document; accordingly, no change has been made to the document in response to this comment.

22.34.101 3739

Refer to response to comment #3691 above.

22.34.102 3740

Note 1 specifically refers to the design of the pedestrian bridge connecting the proposed parking structure to the station. The Authority will coordinate with all stakeholders as the project design progresses.

22.34.103 3741

Refer to response to comment #3707 above.

22.34.104 3742

Refer to response to comment #3707 above.

22.34.105 3743

Refer to response to comment #3709 above.

22.34.106 3744

Refer to response to comment #3710 above.

22.34.107 3745

Refer to response to comment #3687 above.

22.34.108 3746

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.109 3747

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.110 3748

As discussed in Section 2.2.1.5 of the *Los Angeles to Anaheim Project Section Aesthetics and Visual Quality Technical Report*, Shared Passenger Track Alternative A would modify the existing rail corridor to create a corridor that is primarily four mainline tracks from Los Angeles to Fullerton, where two tracks would be electrified and shared with other passenger rail operators. Freight rail would operate primarily on the nonelectrified tracks, although the electrified tracks could accommodate freight traffic, if necessary. Between Fullerton and Anaheim, the corridor would consist of two mainline tracks where both tracks would be electrified and shared with both passenger rail and freight operators. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.111 3749

A dedicated lead track is proposed in the design to provide direct access for HSR trains to travel between the layover yard and the station tracks without affecting existing mainline operations on the existing tracks.

22.34.112 3750

The commenter states that the 800-foot platform at the Fullerton Interlocker does not meet Amtrak platform length standards. However, the Authority is required to follow Metrolink standards at Metrolink stations. Although the current platform lengths are 850 feet, the 800-foot platform length was provided by Metrolink as part of the Fullerton Interlocker design and incorporated into the HSR project design. Further discussions would be needed with Metrolink to increase the platform length.

22.34.113 3751

Pursuant to Section 2.6.3.5 of the Draft EIR/EIS, the Norwalk/Santa Fe Springs Metrolink Station modifications would include a new Metrolink station plaza at the lower level. Stairs, escalators, and elevators would provide access to the modified Metrolink platforms.

22.34.114 3752

Refer to response to comment #3691 above.

22.34.115 3753

Refer to response to comment #3714 above.

22.34.116 3754

Refer to response to comment #3646 above.

22.34.117 3755

Refer to response to comment #3691 above.

22.34.118 3756

As detailed in Table 2-7 of the *Los Angeles to Anaheim Project Section Transportation Technical Report*, the proposed grade separations, along with surface street modifications, are preliminarily anticipated to be built from July 2031 to July 2037. However, Table 2-7 is provided for illustrative purposes. The exact number and timing of the construction packages have not yet been determined and will be decided as project design advances.

22.34.119 3757

Refer to response to comment #3691 above.

22.34.120 3758

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.121 3759

Section 3.3.4.2 of the *Los Angeles to Anaheim Project Section Transportation Technical Report* has been updated to account for the 2024 OC Transit Vision.

22.34.122 3760

Refer to response to comment #3759 above.

22.34.123 3761

Refer to response to comment #3714 above.

22.34.124 3762

Refer to response to comment #3669 above.

22.34.125 3763

Figure 5-20 of the *Los Angeles to Anaheim Project Section Transportation Technical Report* depicts existing pedestrian facilities within proximity to ARTIC. The Santa Ana River Trail and Parkway (OC River Walk) is a recreational resource and, therefore, depicted not in the *Los Angeles to Anaheim Project Section Transportation Technical Report* or Section 3.2 of the Draft EIR/EIS, but instead on Figure 3.15-1 (sheet 7 of 7) in Section 3.15, Parks, Recreation, and Open Space, of the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.126 3764

Figure 5-21 of the *Los Angeles to Anaheim Project Section Transportation Technical Report* has been revised to account for existing and planned bicycle facilities.

22.34.127 3765

The lead agencies for Project Numbers ORA020113 and ORA120531 of Table 6-1 of the *Los Angeles to Anaheim Project Section Transportation Technical Report* have been revised to reflect the correct lead agencies for these projects. These revisions are also included in revisions to Section 3.2.6.2, No Project Alternative, of the Draft EIR/EIS, Table 3.2-18, which also provides the future conditions project list. Refer to Section 16.5.2 in Chapter 16 of the Final EIR/EIS for the revisions to Table 3.2-18 of the Draft EIR/EIS.

22.34.128 3766

The Authority has reviewed Table 6-1 of the *Los Angeles to Anaheim Project Section Transportation Technical Report* and has updated the status of some projects. The final project section technical

reports, including revisions made in response to comments received on the Draft EIR/EIS, are available upon request by contacting the Authority.

22.34.129 3767

The Authority reviewed the roadway changes proposed by OCVIBE within the traffic model to verify if there would be a change in impacts; based on the modeling, there would be no changes in affected intersections or roadway segments in Anaheim. The Authority will continue to coordinate with the City of Anaheim and OCVIBE as both projects advance.

22.34.130 3768

Passenger trips to stations were calculated based on the Authority's ridership data from the 2023 Project Update Report, as described in more detail in Section 3.2.4.3, Methods for Impact Analysis, of the Draft EIR/EIS. The OCVIBE Project was not included specifically within the ridership model, but the model does account for the substantial projected growth in the Platinum Triangle area. The Authority's model assumptions are based on the Southern California Association of Governments' model assumptions, which in turn flow up from growth assumptions provided by the City of Anaheim.

22.34.131 3769

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.132 3770

The modifications to the Fullerton/Amtrak Metrolink Station are included as part of both Shared Passenger Track Alternatives A and B, as described in Section 2.6.3.5 of the Draft EIR/EIS. The HSR station option in Fullerton is analyzed throughout the Draft EIR/EIS within its own subsection for each impact topic. The HSR station option analysis focused on what incremental increases or differences in project effects would occur within the station areas from the additional HSR elements that would be built and operated as part of the HSR station option.

22.34.133 3771

Please refer to Drawings GE-C0111 and GE-C0112, which contain the legend for symbols, including the blue linework. The blue linework is the track alignment centerline.

22.34.134 3772

New or relocated tracks have been designed to have 15-foot minimum track centers, but there are limited areas where 14-foot track centers are used because of right-of-way constraints. Existing tracks that are being maintained within the corridor would remain with their current 14-foot track clearances. The Authority will coordinate with stakeholders on design variances as needed as the designs progress. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.135 3773

The maximum design speed is 110 miles per hour, where the right-of-way and existing geometry allow for it.

22.34.136 3774

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.137 3775

Regarding crossovers at the relocated and modified Metrolink stations, refer to response to comment #3698 above. Although a new crossover has not been provided north of the relocated Commerce Metrolink Station, the existing crossovers near the relocated and modified Metrolink stations have been replaced and relocated in other areas.

Regarding the crossovers at control point Orangethorpe (milepost 166.2), those are existing and would not be modified by the HSR project.

22.34.138 3776

Refer to response to comment #3699 above.

22.34.139 3777

The 10-foot clearance meets minimum California Public Utilities Commission clearance standards and will need to be addressed with Metrolink as the design progresses. All OCS pole locations are preliminary at this stage. Refer to response to comment #3691 above.

22.34.140 3778

Refer to response to comment #3691 above.

22.34.141 3779

Refer to response to comment #3700 above.

22.34.142 3780

This comment was provided on the Administrative Draft EIR/EIS.

Section L-L in Volume 3.1 was revised to include the label for Commerce Metrolink Station prior to the publication of the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.143 3781

Refer to response to comment #3702 above.

22.34.144 3782

Refer to response to comment #3691 above.

22.34.145 3783

Refer to response to comment #3691 above.

22.34.146 3784

Section NN-NN in Volume 3.1 depicts the proposed mainline tracks. The 0-foot clearance is where the tracks join at a switch.

22.34.147 3785

The proposed design and operations generally assume that two mainline tracks will be dedicated for freight operations and the other two would be electrified and primarily used for passenger/HSR operations. On the plan and profile drawings, the tracks depicted in blue and labeled “LA-A NB,” “LA-A SB,” or “LA-A (Both Tracks)” are the electrified passenger tracks. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.148 3786

The commenter requested removing the curvature at the northern end of the platform. The curvature is necessary to minimize impacts on the Coyote Creek crossing and it begins within the last 35 feet of the platform area. The Authority acknowledges this design would require a variance from Metrolink, but it was selected to balance right-of-way impacts with operational needs, because most trains would stop outside the curvature area.

Regarding the request to depict the platform in the profile, refer to response to comment #3691 above. The platform is depicted only in the plan view, which is an appropriate level of detail for 15 percent design.

22.34.149 3787

Given constraints along the corridor, several turnouts and crossovers were located on or near existing underpasses to maintain operational flexibility. Many existing BNSF crossovers are similarly located near structures throughout the corridor, such as at Atlantic Boulevard, Telegraph Road, and Florence Avenue. The exact location of the crossovers would be refined in later phases of design; refer to response to comment #3691 above.

22.34.150 3788

Refer to response to comment #3691 above.

22.34.151 3789

The existing pedestrian bridge is proposed to be removed.

22.34.152 3790

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to response to comment #3699 above.

22.34.153 3791

These crossovers and turnouts are existing facilities and would not be modified as part of the project.

22.34.154 3792

The turnout is an existing facility and would not be modified as part of the project.

22.34.155 3793

As stated in Chapter 2 of the Draft EIR/EIS, OCS poles would be placed approximately every 200 feet in straight portions of track. However, the OCS pole locations are preliminary at the 15 percent design level. The Authority is not aware of any expansion plans in this corridor and will continue to coordinate with OCTA on this topic moving forward.

22.34.156 3794

As described in Section 2.6.3.2, Ancillary Facilities, of the Draft EIR/EIS, the HSR layover tracks would be between Ball Road and State College Boulevard within OCTA's right-of-way. The Authority is not aware of any expansion plans in this corridor, and will continue to coordinate with OCTA on this topic moving forward.

22.34.157 3795

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.158 3796

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.159 3797

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

The PEPD plans are intended to define the environmental footprint for environmental analysis at a 15 percent design level. More detailed designs will be developed in coordination with stakeholders as the design progresses.

22.34.160 3798

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.161 3799

Section 3.4, Noise and Vibration, of the Draft EIR/EIS evaluates the potential construction and operational noise effects, with mitigation measures proposed where there would be an impact. As listed in Table 3.4-16 and Table 3.4-18 of the Draft EIR/EIS, sensitive receptors were considered in Buena Park, between Coyote Creek and Artesia Avenue. Between Brea Creek and Dale Street, moderate noise impacts are projected at four residences in a multifamily building on the northbound side of the tracks. Section 3.4.4, Methods for Evaluating Impacts, describes the Authority's significance criteria, with only severe noise impacts considered to be significant or adverse and requiring mitigation. Because only moderate noise impacts are projected in Buena Park, no mitigation measures are required.

22.34.162 3800

Refer to response to comment #3727 above.

22.34.163 3801

Refer to response to comment #3691 above.

22.34.164 3802

Refer to response to comment #3691 above.

22.34.165 3803

Refer to response to comment #3691 above.

22.34.166 3804

Refer to response to comment #3691 above.

22.34.167 3805

Construction fencing will be required at all excavation locations.

22.34.168 3806

Refer to response to comment #3691 above.

22.34.169 3807

Refer to response to comment #3691 above. Additional seismic studies will be prepared in later phases of design.

22.34.170 3808

Refer to response to comment #3691 above.

22.34.171 3809

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

Potential impacts on freight and passenger rail operations are analyzed in Section 3.2, Impact TR-8. Temporary closures would be required, with specific work windows to be scheduled during windows in which potential disruptions to existing freight and passenger rail service would be minimized. During track closures, freight and passenger rail services could be temporarily rerouted onto one of the other open tracks within the corridor, if needed. Additionally, Caltrans' High Desert Operational Efficiency Project is expected to be completed in 2029, described in detail in Section 2.6.1.5, Planned Freight Rail Improvements, of Chapter 2 and Section 3.2.6.2, which will provide staging capacity for

freight during HSR project construction. The BNSF storage and staging tracks throughout the project section would ultimately be relocated to a new consolidated storage and staging area adjacent to Hobart Yard in Vernon, described in detail Section 2.6.3.5.

It should be noted that Section 2.6.1.5 and Section 3.2.6.3 of the Draft EIR/EIS have been updated in the Final EIR/EIS to update the year by which the High Desert Operational Efficiency Project is anticipated to be completed. Refer to Section 16.4, Chapter 2: Alternatives; and Section 16.5.2 in Chapter 16 of the Final EIR/EIS for this revision.

22.34.172 3810

Refer to response to comment #3691 above. As the design advances, surveys will be completed along the project alignment and at new and modified grade separations to verify clearances.

22.34.173 3811

Refer to responses to comments #3691 and #3727 above.

22.34.174 3812

Refer to response to comment #3691 above.

22.34.175 3813

Refer to response to comment #3691 above.

22.34.176 3814

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

Basic construction phases were assumed for purposes of environmental analysis, included in Volume 3.3, sheet ST-K1572 of the Draft EIR/EIS. At this level of design, this proposed staging plan has been determined to be feasible, but more detailed design and phasing will be developed in coordination with stakeholders as the design progresses.

22.34.177 3815

Both the City of Anaheim and Metrolink have had opportunities to review the PEPD. The Authority will continue to coordinate with both parties as project designs progress. Refer to response to comment #3691 above.

22.34.178 3816

This comment was provided on the Administrative Draft EIR/EIS. The Authority checked the PEPD labels and made modifications, as necessary, prior to the publication of the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.179 3817

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

Refer to response to comment #3814 above.

22.34.180 3818

Refer to response to comment #3691 above.

22.34.181 3819

Refer to response to comment #3691 above.

22.34.182 3820

Refer to response to comment #3691 above.

22.34.183 3821

Impacts on utilities from grade separations are defined in Volumes 3.3 and 3.4 of the PEPD. Impacts on utilities are analyzed in Section 3.6, Public Utilities and Energy, of the Draft EIR/EIS.

22.34.184 3822

Refer to response to comment #3691 above.

22.34.185 3823

The commenter states that Metrolink criteria require access at the center of the platform, but this is not a required standard. For example, there are existing Metrolink stations that only have access from one end of the platform. The Authority has been working with Metrolink throughout the design process, and Metrolink has not expressed concerns with this design. Regarding emergency egress at station platforms, refer to response to comment #3691 above.

22.34.186 3824

The relocated Buena Park Metrolink Station would include the same amenities and number of parking spaces as the existing station.

22.34.187 3825

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

Refer to response to comment #3814 above.

22.34.188 3826

The potential future pedestrian connection to Tulare Street has been removed from the drawings per outreach with the City of Buena Park. The station concept depicted on Figure 2-67 and Volume 3.5 of the Draft EIR/EIS has been revised in the Final EIR/EIS to update the environmental footprint and remove this pedestrian connection. Please refer to Section 16.4 and Section 16.56.6, Volume 3.5: General and Stations, in Chapter 16 of the Final EIR/EIS for this revision.

22.34.189 3827

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

As described in Impact TR-8 in Section 3.2 of the Draft EIR/EIS, the existing Metrolink stations would remain open until the relocated Metrolink stations are built. Further staging details would be developed in coordination with stakeholders, as design progresses.

22.34.190 3828

The Authority's policy is to rebuild existing infrastructure in kind. Therefore, the relocated Buena Park Metrolink Station would include the same number of parking spaces that are at the existing station. However, as depicted on Figure 2-67 of the Draft EIR/EIS, the Authority has left space within the station footprint that would be available for the city to use to develop additional parking, should the city wish to pursue a separate project to do so.

22.34.191 3829

Refer to response to comment #3691 above.

22.34.192 3830

The proposed station platform layout was developed in coordination with Metrolink. Currently there is not a direct connection from the parking garage to the platform, but the City of Fullerton would not be precluded from pursuing this as part of a subsequent project. The Authority conducted walk-time analysis of existing conditions and conditions with implementation of the Shared Passenger Track Alternatives. The Authority shared the results of this analysis as part of a meeting with the City of

Fullerton in May 2025. According to the results of the Authority's walk-time analysis, the proposed conditions would result in an approximately 30-second increase in the time to walk from the existing parking structure or Pomona Avenue to the new center platform, as compared to the existing conditions of walking from these locations to the station's existing platform. For those requiring Americans with Disabilities Act facilities, the Shared Passenger Track Alternatives would result in a 20-second decrease from the existing parking structure and a 10-second decrease from Pomona Avenue, as compared to existing conditions.

22.34.193 3831

Refer to response to comment #3830 above.

22.34.194 3832

Passenger trains could operate on the BNSF mainline track and serve the platform. However, with the proposed reconfiguration and optimization of tracks in the Fullerton Metrolink/Amtrak Station area, it would be unlikely that passenger trains would use the BNSF mainline tracks.

22.34.195 3833

The existing parking lot on the southern side of the station is proposed to be fully removed.

22.34.196 3834

Ramps would be provided as depicted in the drawing and described in Section 2.6.3.5 of the Draft EIR/EIS.

22.34.197 3835

As discussed under Impact TR-8 in Section 3.2.6.3 of the Draft EIR/EIS, the proposed Fullerton Metrolink/Amtrak Station modifications would require removal of approximately 27 parking spaces along the southern side of the project corridor, as well as a small number of on-street parking spaces. However, the Draft EIR/EIS concludes that the 1,321 parking spaces in the existing parking structure on the northern side of the corridor should be sufficient to accommodate passengers. The Draft EIR/EIS additionally notes that there are multiple paid parking structures nearby in downtown Fullerton and free parking options. The number of parking spaces, as identified in Section 3.13 of the Draft EIR/EIS, that would be provided by the Fullerton HSR Station Option's new parking structure has been corrected in the Final EIR/EIS. Refer to Section 16.5.13 in Chapter 16 of the Final EIR/EIS for the revision. The Fullerton HSR Station Option would provide additional parking in a new HSR parking structure, as described in Section 2.6.6.2. The new HSR parking structure could be accessed from Walnut Avenue.

22.34.198 3836

Refer to response to comment #3830 above.

22.34.199 3837

The proposed platform at Fullerton Metrolink/Amtrak Station would accommodate both existing and future Amtrak and Metrolink services.

22.34.200 3838

Refer to response to comment #3691 above.

22.34.201 3839

The Walnut Avenue realignment plans are included in Volume 3.3 and described in Section 2.6.3.5 of the Draft EIR/EIS.

22.34.202 3840

Refer to response to comment #3835 above.

22.34.203 3841

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

The current expectation is that the new pedestrian undercrossing would be fully built and operational before the current overcrossing is taken out of service. There would be temporary disruptions to track access to build the new pedestrian undercrossing, but it would be staged so that not all tracks will be taken out of service at once. Further staging details will be developed as design progresses.

22.34.204 3842

This comment is acknowledged. Refer to Volume 3.3 of the Draft EIR/EIS for the proposed preliminary bridge concepts.

22.34.205 3843

TR-IAMF#13 requires the Authority to coordinate with agencies that provide existing or planned rail services or maintain operating rights within the corridor to ensure that the design, construction, and operation of the project section do not adversely affect existing and planned rail service. With incorporation of TR-IAMF#13, the Authority will address minimizing the project's effects on existing parking necessary for maintaining current revenue service at the Fullerton Metrolink/Amtrak Station. Additionally, TR-IAMF#3, Off-Street Parking for Construction-Related Vehicles, requires the Authority to identify adequate off-street parking for construction-related vehicles throughout the construction period to minimize impacts on public on-street parking areas.

22.34.206 3844

No changes are proposed for the existing Metrolink platforms or facilities at ARTIC. As described in Section 3.2 of the Draft EIR/EIS, the introduction of HSR-induced ridership was included as part of ARTIC's operational components in the 2010 Anaheim Regional Transportation Intermodal Center Draft Environmental Impact Report. Therefore, the capability of ARTIC transit providers to accommodate HSR-induced ridership was generally accounted for by the City of Anaheim in its environmental analysis and planning of the station.

22.34.207 3845

This comment was provided on the Administrative Draft EIR/EIS, where the incorrect parking information at ARTIC had been included. The number of parking spaces was corrected prior to publication of the Draft EIR/EIS. As discussed in Section 2.6.3.3, High-Speed Rail Station Facilities, ARTIC would include a total of 1,976 parking spaces. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.208 3846

Detailed pedestrian movement modeling will be conducted in later phases of design. The proposed pedestrian walkways between HSR, Metrolink, and Amtrak generally match existing conditions and therefore sufficient space for cross movement would be maintained.

22.34.209 3847

The environmental footprint at ARTIC is depicted on sheet AR-B0901 in Volume 3.5 of the Draft EIR/EIS, which includes proposed right-of-way acquisitions. No further property acquisitions are proposed beyond what is presented in Volume 3.5. The Authority would pay for any land acquisitions required for the project. The commenter refers to a connection to E Katella Avenue; this connection is existing, and no other road improvements would be needed.

22.34.210 3848

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

No columns are proposed for removal. The columns depicted in the referred drawing are existing and have sufficient clearance for the HSR alignment to fit. Refer to Volume 3.3 of the Draft EIR/EIS for the proposed preliminary bridge concept.

22.34.211 3849

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

Construction of the HSR platform and facilities at ARTIC is adjacent to and generally outside the operating limits of the existing station and therefore assumed to have minimal impacts on existing station operations.

22.34.212 3850

The existing Metrolink/Amtrak platform at ARTIC would not be modified.

22.34.213 3851

The existing platforms at this location are no longer used for passenger loading/unloading as they previously were used when the station building was within the Angel Stadium parking lot. Ramps are currently provided from the existing platforms and provide access to the existing pedestrian underpass. The ramps will be reconfigured as the project design advances to connect with the extended pedestrian underpass, which would also serve the new HSR center platform.

22.34.214 3852

The Authority has coordinated with the City of Anaheim and the OCVIBE development team, and their preference is to provide access through the main station building. The existing parking lot south of the main station building would be removed with the spaces relocated to a new parking structure; therefore, passenger access is no longer needed from south of the platforms.

22.34.215 3853

The existing underpass at ARTIC to the bus terminal site is proposed to remain as is.

22.34.216 3854

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18 for additional information on how the Authority is coordinating with the City of Anaheim regarding ongoing development surrounding ARTIC and maintaining pedestrian connectivity to transit. Section 3.19 and Appendix 3.19-A, Cumulative Plans and Nontransportation Projects List, was updated to include the “Building Bridges to Transit” project as part of the planned projects considered. The Authority will continue coordination with the City of Anaheim as the design of the project section progresses. Refer to Section 16.5.19 and Section 16.47, Appendix 3.19-A: Cumulative Plans and Nontransportation Projects List, in Chapter 16 of the Final EIR/EIS for these revisions.

22.34.217 3855

Section 2.5 of the Draft EIR/EIS summarizes the alternatives development process, which included different alignments throughout the City of Fullerton. The design presented in the Draft EIR/EIS reflects Metrolink’s design for the Fullerton Interlocker Project.

22.34.218 3856

Regarding emergency egress at stations, refer to response to comment #3691 above. Regarding pedestrian interchange movement, refer to response to comment #3846 above.

22.34.219 3857

This comment is acknowledged.

22.34.220 3858

This comment was provided to the Authority on a Draft PEPD set from 2019, and the Authority provided a response to OCTA on this comment on December 20, 2019. The commenter has not raised new issues on this topic that require a response.

22.34.221 3859

This comment was provided to the Authority on a Draft PEPD set from 2019, and the Authority provided a response to OCTA on this comment on December 20, 2019. The commenter has not raised new issues on this topic that require a response.

22.34.222 3860

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.223 3861

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.224 3862

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.225 3863

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.226 3864

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

The Authority conducted operational analysis specifically for the Fullerton Junction to ARTIC segment, and determined that implementation of HSR would not preclude the forecasted capacity for Metrolink and the LOSSAN Corridor to 2050. The Authority prepared this analysis in coordination with OCTA in 2024, and shared the results of the planning assessment in fall of 2024. The Authority does not anticipate needing additional right-of-way in the Anaheim/OCTA corridor.

22.34.227 3865

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.228 3866

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.229 3867

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to response to comment #3691 above.

22.34.230 3868

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.2 TRAN-01: Freight and Passenger Rail Operations During Construction, in Chapter 18.

This comment was provided to the Authority on a Draft PEPD set from 2019. The scope of improvements to be built between Fullerton and Anaheim as part of the project section has changed substantially compared to previously analyzed alternatives, with much less new or modified infrastructure required for the Shared Passenger Track Alternatives. Most new infrastructure between Ball Road and the Santa Ana River would be built adjacent to existing railroad infrastructure and could be built with minimal operational effects on existing tracks. The OCS and other system improvements could be built while railroad operations continue, as was recently done as part of the Caltrain Electrification Project in Northern California. Therefore, the proposed construction activities are expected to be completed without needing to modify Metrolink or other rail operations or upgrade infrastructure on the Olive Subdivision. As the project progresses to later stages of design, the Authority will coordinate with OCTA and Metrolink on more detailed construction staging plans to minimize operational impacts on the LOSSAN Corridor.

22.34.231 3869

The project section is correctly designated as the Tongva Subdivision per the Authority's 2025 Design Criteria Manual Revision 7.0, Chapter 2. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.34.232 3870

This comment was provided to the Authority on a Draft PEPD set from 2019, and the Authority provided a response to OCTA on this comment on December 20, 2019. The commenter has not raised new issues on this topic that require a response.

22.34.233 3871

Refer to responses to comments #3691 and #3772 above.

22.34.234 3872

The Authority will coordinate with OCTA on the diamond crossings in future phases of design. In addition, it should be noted that the note on sheet GE-B0101, as well as the other Basis of Design Summary sheets throughout Volume 3, have been corrected to state "where operating speeds, as shown on the plans, allow."

22.34.235 3873

As depicted on sheet GE-D6101 of the PEPD, the light blue line suggested by the commenter is to indicate new tracks that would be only for Amtrak/Metrolink use. As depicted on sheet TT-D1618 of the PEPD, the project corridor south of Lewis Street would consist of two shared tracks to be used by HSR trains and other passenger rail operators, as well as layover tracks on the western side of the corridor. Therefore, the current purple line is the correct color. No revisions have been made to sheet GE-D6101 in response to this comment.

22.34.236 3874

Refer to response to comment #3691 above.

22.34.237 3875

The Authority acknowledges OCTA's request. The Authority will coordinate with OCTA, BNSF, and Metrolink as project design advances.

22.34.238 3876

Station parking with fewer than 500 spaces will be coordinated with and agreed upon by Metrolink, the station owner, and the City of Buena Park as SCRRA Design Criteria Manual Version 7.5 requires.

Refer to response to comment #3828 above, which explains that the station design includes space to accommodate additional parking should the agencies determine that additional supply is needed.

22.34.239 3877

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18.

Property acquisitions necessary for the project section will be obtained by the Authority.

22.34.240 3878

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.241 3879

Costs associated with the proposed Buena Park Metrolink Station relocation are included as part of the project section. Refer to Appendix 6-B, Los Angeles to Anaheim Project Section Preliminary Engineering for Project Definition Record Set Capital Cost Estimate Report, of the Draft EIR/EIS. The Authority will coordinate with OCTA to confirm costs as the project design advances.

22.34.242 3880

Refer to response to comment #3828 above.

22.34.243 3881

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.244 3882

The commenter is correct. The proposed Fullerton Metrolink/Amtrak Station modifications include a new railroad bridge over Highland Avenue to accommodate the new shared track, slight realignment of Walnut Avenue to the south, reconfiguration of the intersection of Walnut Avenue/Highland Avenue intersection, removal of two side platforms, removal of the existing pedestrian bridge, installation of a new pedestrian underpass, a new center platform, and other modifications. Refer to Section 2.6.3.5 of the Draft EIR/EIS for more information. The Authority will coordinate with OCTA as the project design advances.

22.34.245 3883

Space has been provided to allow for inter-track fences, which will be depicted on plan sheets as project design advances. Refer to response to comment #3691 above.

22.34.246 3884

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

The commenter states that modifications at the Fullerton Metrolink/Amtrak Station will severely affect OCTA services, including plans for 30-minute service between Fullerton and Irvine. The commenter also refers to infrastructure OCTA had added to provide this service, such as a platform that would not be replaced by HSR. In previous discussions with OCTA, the Authority understood that OCTA had planned for this service between Fullerton and Irvine to be the first step of phased LOSSAN Corridor infrastructure improvements, with service terminating in Fullerton because of capacity constraints north of Fullerton on the BNSF San Bernardino Subdivision. With construction of the fourth mainline track between Fullerton and Los Angeles as part of the Shared Passenger Track Alternatives, this capacity constraint would no longer exist, and all Metrolink OC Line trains could proceed to Los Angeles instead of terminating at Fullerton; this is a key benefit of the HSR project to OCTA and Metrolink. Much of the turnback infrastructure that has already been built by OCTA in

Fullerton can be used for through-passenger service as part of the project section, but the Authority will coordinate with OCTA and Metrolink on accommodating turnback movements at Fullerton in the future, if required. Finally, note that previous Orange County Metrolink service that terminated at Fullerton was lightly used, and was discontinued in March 2020. The Authority is not aware of any plans to revive this service.

22.34.247 3885

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

22.34.248 3886

Refer to response to comment #3691 above.

22.34.249 3887

Refer to response to comment #3691 above.

22.34.250 3888

The design accounts for additional right-of-way needs in this area. Refer to Volume 3.1, sheets RW-M1600 and RW-M1601, that indicate that approximately 2,400 square feet of Assessor's Parcel Number 033-143-37 (the property directly adjacent to STA 1325+00) will be required to accommodate required track and California Public Utilities Commission clearance requirements. The design of the curve could be modified at a later stage to avoid right-of-way impacts at this location.

22.34.251 3889

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.252 3890

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.253 3891

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.254 3892

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.255 3893

Refer to response to comment #3691 above.

22.34.256 3894

The Authority will coordinate with OCTA and other stakeholders on the diamond crossings in future phases of design and provide a copy of the Authority's coordination with Metrolink and BNSF regarding this location.

22.34.257 3895

Refer to response to comment #3691 above.

22.34.258 3896

The PEPD plans are intended to define the environmental footprint for impact analysis at a 15 percent design level. The Authority acknowledges the commenter's suggestion regarding the turnout, and will work with BNSF and Metrolink in later phases of design to refine this track alignment in greater detail.

22.34.259 3897

The fence will be provided at the back of the platform, which will be depicted on plan sheets as project design advances. Refer to response to comment #3691 above.

22.34.260 3898

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.261 3899

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.262 3900

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.263 3901

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.264 3902

The commenter is referring to the Orangethorpe Avenue grade separation, but the HSR project no longer proposes a grade separation at this location.

22.34.265 3903

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.266 3904

Refer to Standard Response LAA-Response-Chapter 2 Alt-06: Future Rail Operator Coordination and Agreements, in Chapter 18.

Refer to Standard Response LAA-Response-Chapter 2 Alt-07: Corridor Capacity, in Chapter 18.

22.34.267 3905

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.268 3906

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old grade separation design that is not included in the current PEPD set.

22.34.269 3907

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.270 3908

The project is at 15 percent level of design, and the Authority has proposed structural designs that are assumed to be feasible based on high-level assumptions, which is standard practice. Additional analysis and data collection would be prepared in later phases of design, such as geotechnical borings, which would be used to further refine or revise the design as needed.

22.34.271 3909

Refer to Standard Response LAA-Response-Chapter 2 Alt-05: Grade Separations, in Chapter 18.

The commenter refers to a November 2014 letter from the City of Anaheim. The Authority contacted the commenter on July 8, 2026, and provided the letter they requested.

22.34.272 3910

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.273 3911

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.274 3912

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.275 3913

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.276 3914

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.277 3915

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.278 3916

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22.34.279 3917

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old grade separation design that is not included in the current PEPD set.

22.34.280 3918

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old grade separation design that is not included in the current PEPD set.

22.34.281 3919

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.282 3920

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.283 3921

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.284 3922

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22.34.285 3923

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old grade separation design that is not included in the current PEPD set.

22.34.286 3924

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old grade separation design that is not included in the current PEPD set.

22.34.287 3925

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old grade separation design that is not included in the current PEPD set.

22.34.288 3926

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22.34.289 3927

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22.34.290 3928

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.291 3929

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.292 3930

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old track design that is not included in the current PEPD set.

22.34.293 3931

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.294 3932

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.295 3933

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old design at Fullerton Junction that is not included in the current PEPD set.

22.34.296 3934

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old design at Fullerton Junction that is not included in the current PEPD set.

22.34.297 3935

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old design at Fullerton Junction that is not included in the current PEPD set.

22.34.298 3936

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old design at Fullerton Junction that is not included in the current PEPD set.

22.34.299 3937

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old grade separation design that is not included in the current PEPD set.

22.34.300 3938

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.301 3939

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.302 3940

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.303 3941

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.304 3942

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.305 3943

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.306 3944

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.307 3945

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old grade separation design that is not included in the current PEPD set.

22.34.308 3946

This comment was provided to the Authority on a Draft PEPD set from 2019. This comment is no longer applicable, because it was regarding an old grade separation design that is not included in the current PEPD set.

22.34.309 3947

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.310 3948

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.311 3949

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.312 3950

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

22.34.313 3951

The Authority had provided a response to OCTA on this comment on December 20, 2019; the commenter has not provided further comments on this topic in the attachment.

Los Angeles to Anaheim - RECORD #013870 DETAIL

Status:	Action Pending
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Harald Luna

Stakeholder Comments/Issues:

1600 To whom it may concern, Thank you for the opportunity to comment on the Draft Environmental Impact Report/Environmental Impact Statement. Chapter 3 Affected Environment, Environmental Consequences, and Mitigation Measures Section 3.13 Station Planning, Land Use, and Development, Impact LU-4: Permanent Alteration of Land Use Patterns from Land Use Conversion states: "In Buena Park, 13.55 acres would need to be acquired and converted to transportation uses for the relocation of the Buena Park Metrolink Station. These lands are primarily designated for single-family residential, multifamily residential, and industrial and mixed commercial. Adjacent land is designated as single-family residential, multifamily residential industrial, mixed commercial, and transportation—railroad. A passenger station is a permitted use under Buena Park's light industrial zoning designation (City of Buena Park 2025). The mix of surrounding land uses would be similar to those surrounding the existing station. Therefore, the permanent acquisition of land associated with the relocation of the Buena Park Metrolink Station would not permanently alter land use patterns." Comment: Per the Buena Park Municipal Code (BPMC) Section 19.512.010 Permitted Uses - Commercial and Industrial Zones, Passenger Stations are conditionally permitted uses subject to approval of a Conditional Use Permit in the CO (Office), CS (Community Shopping), CG (Commercial General), CR (Regional Commercial), and ML (Light Industrial) Zones. Per the BPMC Sections 19.312.010 Permitted Uses – Single-Family Residential Zones and Section 19.412.010 Permitted Uses - Multi-Family Residential Zones Passenger Stations are not
1601 listed as permitted uses. Section 3.13.5.2 Zoning and Planned Uses (Page 3.13-44) states: City of Buena Park Existing zoning in Buena Park is depicted on Figure 3.13-A2, sheets 9 and 10, of Appendix 3.13A. Existing zoning in the indirect RSA for the existing and proposed Buena Park Metrolink Station is depicted on Figure 3.13-A2, sheet 9, of Appendix 3.13-A. Comment: Figure 3.13-A1 Existing Land Use, Sheet 10 of 14 Shows incorrect zoning for the properties located east of Dale Street and to the north of the rail road right of
1602 way. The zoning for the properties is PD (Planned Development) Chapter 3 Affected Environment, Environmental Consequences, and Mitigation Measures Section 3.5 Electromagnetic Fields and Electromagnetic Interference States: Construction Impacts - Impact EMF/EMF-1: Temporary Impacts from Use of Heavy Construction Equipment Table 3.5-12 List of Potentially Sensitive Receptors: Receptor Site ID and Name: 13. Nutrilite Health institute Comment: The property located at 5600 Beach Boulevard has an active Planning Division application for a 281 multi-family residential development was the proposed multi-family residential development analyzed as part of the environmental review. We welcome to having further discussions with other potential impacts associated with the Draft Environmental Impact Report/Environmental Impact Statement. Regards, HARALD LUNA PLANNING MANAGER | PLANNING DIVISION Community & Economic Development P: (714) 562-3618 | F: (714) 562-3770 HLuna@buenapark.com www.buenapark.com 6650 Beach Blvd. | Buena Park, CA | 90621 City Hall Offices are closed every Friday.

22.35 Response to Submission 013870 (Harald Luna, City of Buena Park, Feb 3, 2026)

22.35.1 1600

The comment seeks to clarify permitted and conditionally permitted land uses in relevant Buena Park zoning districts. Refer to Figure 3.13-A2, sheet 9, of Appendix 3.13-A, Existing Land Uses and Zoning of Project Temporary Uses and Permanent Acquisitions Figures, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) for zoning associated with the proposed Buena Park Metrolink Station site. Table 3.13-C12 in Appendix 3.13-C, Zoning Tables, of the Draft EIR/EIS details the total acres of existing zoning within the indirect resource study area for the Buena Park Metrolink Station. Land that would be permanently acquired for the proposed Buena Park Metrolink Station is mostly zoned industrial (10.08 acres), with smaller amounts of single-family residential (3.45 acres) and open space and recreational (0.02 acre). The proposed Buena Park Metrolink Station would be on industrially zoned land. Supporting facilities would be on land zoned for other land uses (single-family residential and open space/recreational). The single-family residential land that would be permanently acquired is directly parallel to the existing rail line; its use would therefore not permanently alter land use patterns. Final EIR/EIS Section 16.5.13, Section 3.13: Station Planning, Land Use, and Development, in Chapter 16, Corrections and Additions to the Draft Report, reflects revisions to the text to clarify that a passenger station is a conditionally permitted use under Buena Park's light industrial zoning designation in response to this comment.

22.35.2 1601

Thank you for the clarification. As stated in Section 3.13.5.2, Zoning and Planned Uses, the maps in Appendix 3.13-A of the Draft EIR/EIS are based on generalized zoning. Figure 3.13-A2, sheet 9 of Appendix 3.13-A depicts the zoning for the properties east of Dale Street and to the north of the railroad right-of-way as single-family residential and multifamily residential. Although the interactive online zoning map for Buena Park lists this area as zoned for Planned Development, generalizing this as single-family residential and multifamily residential zoning helps readers understand the potential impacts of the project and allows for greater comparison across the numerous communities along the corridor. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.35.3 1602

Potential electromagnetic field (EMF)/electromagnetic interference impacts on the property at 5600 Beach Boulevard, currently Nutrilite Health Institute, were evaluated in the Draft EIR/EIS related to its current use as a medical research facility. Draft EIR/EIS Section 3.5, Electromagnetic Fields and Electromagnetic Interference, is focused on potential project effects on the disruption of sensitive equipment/instruments, such as those present at a medical research facility (but not typically present in residential development). Permanent human exposure to EMFs is discussed under Impact EMF/EMI#4. As discussed in Section 3.5.6.3, Project Impacts, human exposure to EMFs during operations of the Shared Passenger Track Alternatives would be permanent but intermittent, and in all cases, the predicted EMF value at all sensitive receptors would be less than the maximum permissible exposure impact thresholds of 5 kilovolts per meter for electric fields and 9,040 milligauss for magnetic fields for public exposure. The high-speed rail (HSR) design procedures and impact avoidance and minimization features will substantially limit and control EMFs. Human exposure to operational EMFs generated either by the trains, the overhead contact system, or wayside equipment or HSR maintenance activities would fall well below the maximum permissible exposure limit. Given this, passengers, HSR workers, and the public would not be exposed to an EMF health risk.

The California High-Speed Rail Authority appreciates the update regarding the application for a proposed change in use at the subject site. No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013877 DETAIL

Status:	Action Pending
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Patrick Lewis

Stakeholder Comments/Issues:

Attached please find public comment from the Gateway Cities Council of Governments for the Los Angeles to Anaheim Draft EIR/EIS. Thanks, Patrick Lewis (he/him) Transportation Analyst Gateway Cities Council of Governments 16401 Paramount Blvd. Paramount CA, 90723 plewis@gatewaycog.org | www.gatewaycog.org | Meet our Board Members

Artesia
Avalon
Bell
Bellflower
Bell Gardens
Cerritos
Commerce
Compton
Cudahy
Downey
Hawaiian Gardens
Huntington Park
Industry
La Mirada
Lakewood
Long Beach
Lynwood
Maywood
Montebello
Norwalk
Paramount
Pico Rivera
Santa Fe Springs
Signal Hill
South Gate
Vernon
Whittier
County of Los Angeles
Port of Long Beach

GATEWAY CITIES

February 3, 2026

Los Angeles to Anaheim Draft EIR/EIS Comment
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

California High-Speed Rail Authority:

Support for Los Angeles to Anaheim Project Section and Inclusion of Norwalk/Santa Fe Springs Station

1136

Gateway Cities Council of Governments (Gateway Cities) supports the California High- Speed Rail Authority Los Angeles to Anaheim Project Section, including a Norwalk/Santa Fe Springs station along the route. Additionally, the cities of Norwalk and Santa Fe Springs have both expressed interest in the inclusion of an intermediate station along the California High-Speed Rail Los Angeles–to–Anaheim project section. Their engagement reflects a shared desire to enhance regional mobility and strengthen connectivity within the corridor.

Gateway Cities is a joint powers authority of 27 cities (including Norwalk and Santa Fe Springs) and 11 unincorporated areas in southeast Los Angeles County, with over two million residents. In fact, if we were one city, we would be the fifth largest in the United States; if we were one state, we would be the 38th most populous in the country. We are over 5% of California's population, but have over 14% of the disadvantaged community census tracts in the state. At the same time, we have four of the 19 Community Air Pollution Program (AB 617) designations in California, neighborhoods that require mitigation to improve air quality and reduce greenhouse gases.

The Los Angeles to Anaheim Project Section represents a transformative investment in Southern California's transportation future. By improving mobility, reducing congestion, and advancing sustainable travel options, this project will play a critical role in supporting economic vitality and regional connectivity. Gateway Cities supports these objectives and offers the following recommendations to ensure the project delivers maximum benefits for our communities.

As part of this effort, we urge the Authority to include the Norwalk/Santa Fe Springs High- Speed Rail station as the preferred intermediary station between Los Angeles Union Station and the Anaheim Regional Transportation Intermodal Center (ARTIC) in the Los Angeles to Anaheim Project Section Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS).

This location offers unique advantages that will maximize the benefits of high-speed rail for the region:

- Broad Local Support: Both the City of Norwalk and the City of Santa Fe Springs have expressed their support for this station, recognizing its potential to serve residents, businesses, and visitors.
- Strategic Location: Norwalk/Santa Fe Springs is ideally situated approximately halfway between Union Station and ARTIC, providing balanced access for travelers across the corridor. In contrast, the other optional intermediary station—Fullerton Station—is located very close to ARTIC, offering minimal additional connectivity and reducing the value of an intermediary stop. Norwalk/Santa Fe Springs clearly provides the most logical and equitable choice for regional mobility.
- Regional Connectivity and Economic Impact: The Gateway Cities region is home to a diverse workforce and numerous major employers. A station in this location will strengthen connections between job centers and communities, supporting economic growth and reducing congestion.
- Future Rail Transfer and Multimodal Integration: The proposed station is near to Metro's C Line (Green) light rail station with connectivity to the current Norwalk/Santa Fe Springs Metrolink station. This connection enables direct rail access to Los Angeles International Airport (LAX) and the full LA Metro bus and rail system, further expanding the reach of the high-speed rail network.

We firmly believe that the inclusion of the Norwalk/Santa Fe Springs station will significantly enhance mobility options for millions of residents and businesses while advancing regional equity and sustainability in the southeast Los Angeles County region.

Gateway Cities looks forward to continuing to work collaboratively with the California High-Speed Rail Authority to ensure the success of the Los Angeles to Anaheim Project Section. Feel free to reach out with any questions regarding our support for the proposed Norwalk/Santa Fe Springs station at hdelatorre@gatewaycog.org.

Sincerely,

Hector De La Torre
Executive Director
Gateway Cities Council of Governments

22.36 Response to Submission 013877 (Patrick Lewis, Gateway Cities Council of Governments, Feb 3, 2026)

22.36.1 1136

Refer to Standard Response LAA-Response-Chapter 2 Alt-03: HSR Station Options, in Chapter 18, Standard Responses.

The California High-Speed Rail Authority (Authority) appreciates the Gateway Cities Council of Governments' support of the project and acknowledges the agency's preference for inclusion of the intermediate Norwalk/Santa Fe Springs High-Speed Rail (HSR) Station Option in the preferred alternative. Chapter 8, Preferred Alternative, of the Draft Environmental Impact Report/Environmental Impact Statement explains the reasons the Authority has not included an intermediate HSR station in the Preferred Alternative. The intermediate HSR station options would not result in increased benefits related to transit-oriented development, because passenger rail stations already exist at Norwalk/ Santa Fe Springs and Fullerton. Excluding either intermediate HSR station option would reduce costs and reduce duplicative passenger rail service within the project corridor.

Los Angeles to Anaheim - RECORD #013878 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Local Agency
Full Name:	Jessica Serrano

Stakeholder Comments/Issues:

Hello HSRA Team, Thank you for the opportunity to comment on the Los Angeles to Anaheim Draft EIR/EIR. Please see the attached comment letter from the City of Commerce on the Draft EIR/EIR. Let me know if you have any questions regarding our comment letter or related matters. Thank you, Jessica Serrano Director of Community Development City of Commerce 2535 Commerce Way Commerce, CA 90040 (323) 722-4805 Ext. 2811

CITY OF COMMERCE

COMMUNITY DEVELOPMENT DEPARTMENT

February 3, 2026

ATTN: Los Angeles to Anaheim Draft EIR/EIS Comment
California High-Speed Rail Authority
355 South Grand Avenue, Suite 2050
Los Angeles, CA 90071

SUBMITTED VIA EMAIL TO Los.Angeles_Anaheim@hsr.ca.gov

SUBJECT: City of Commerce Comments on the California High-Speed Rail Authority's (HSRA's) Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Los Angeles to Anaheim Project Section

Dear California High-Speed Rail Authority Team,

Thank you for the opportunity to provide written comment on the HSRA's EIR/EIS for the Los Angeles to Anaheim Project Section.

1156 The City participated in an in-person open house/public hearing held in the City of Commerce on January 22, 2026 and in the virtual open house/public hearing held on January 26, 2026. At those public hearings, staff voiced concerns regarding the impacts of the HSRA project analyzed in the Draft EIR/EIS onto the City of Commerce citing concerns regarding impacts onto local businesses, residents and the City's local economy.

1157 In this comment letter, the City is providing further elaboration on City's comments and questions regarding the EIR/EIS:

1. The GIS interactive map for this project does not offer an option to turn on and off city boundary lines. This would have been a helpful tool to help the City evaluate impacts and identify which of the affected parcels are in the City of Commerce.

1158 2. At least 3 parcels shown on the GIS interactive map are owned by the City, including Assessor's Parcel Nos. 6332-006-900, 6332-004-902 and 6332-004-902. Please provide greater detail regarding the timing for the acquisition, the negotiation process and what entity will acquire the properties.

1159

3. What impacts will occur to the City's local circulation particularly along Washington Boulevard, Shiela Street, access on and off the I-710 freeway and additional affected collector streets?

4. In addition to the comment above, it will reroute the heavy truck traffic on the City streets to Washington Boulevard, which is already a heavilty congested corridor. Please identify the traffic impact on the City streets and mitigation measures to operate City of Commerce streets safely at an acceptable Level of Service C or better.

1160

5. Relocating BSNF container holding area north parallel and to the south of Washington Boulevard, will have significant impacts as follows:

    a. Significant impacts to businesses and economic development in the City of Commerce will result in closing of 115 small businesses and loss of over 1100 jobs.

1161

    b. The area south of Washington Boulevard currently has local streets in the areas where the new BSNF container holding area is proposed to be relocated to. What will happen to the local streets in this area such as Pacific Way, Ash Street and Oak Street, among others? Will the HSRA request a street vacation for these local streets to accommodate the new BSNF container holding area?

1162

    c. Washington Boulevard is a major corridor in the City of Commerce and is an important gateway into the City from adjacent communities. Removal of existing structures on approximately 119 properties to build a new BSNF container holding area will significantly impact the aesthetics and limit land use patterns of a substantial portion of the Washington Boulevard corridor west of the I-710.

1163

    d. The City is currently updating its general plan through an initiative called "Reimagine Commerce" which involves visioning and creating land use policies which promote economic development, walkable corridors and neighborhoods, policies to allow mixed use developments including adding residential uses, and revitalization of Washington Boulevard and Atlantic Boulevard, among other areas of the City. You can learn more about this effort by visiting our website at: https://www.reimaginecommerce.com/. The new BSNF container hold area on Washington Boulevard is contrary to the City's efforts to beautify the City, build more housing along major corridors, including Washington Boulevard, and implement programs in the City's adopted and certified Housing Element. The Draft EIS/EIR does not take into consideration and analyze the City's existing and future land use policies and efforts to strengthen our local economy, revitalize and beautify areas of the City, and increase jobs, services and amenities for our residents. The Draft EIS/EIR is flawed because it does not properly analyze the City's long-range plans, such as the City's General Plan, Housing Element, specific plans and area plans. Provide amendments to the Draft EIS/EIR to fully evaluate how the project complies with City's General Plan, Housing Element, specific plans and area plans and properly analyze whether there will be signification, long-term and cumulative environmental impacts to land use patterns, regional growth and infrastructure improvements in Commerce.

1164

e. Provide streetscape drawings and photo simulations of the visual impacts of the new BSNF container holding area from Washington Boulevard and other collector streets showing proposed fencing, landscape, and typical height of containers stacked in the holding area, among others.

1165

6. According to the GIS interactive map, a substantial number of properties in Commerce along Washington Boulevard and along the existing railroad tracks will either be full acquisitions or partially affected. The following are comments or questions related to the impacts related to these partial or full acquisitions:

   a. The City believes that the economic impacts will be significant when considering all of the properties that will be affected by the HSRA's project.

   b. The EIR must include a city specific economic analysis of impacts for Commerce given the significant impacts due to the large quantity of affected properties that will either displace or impact local businesses. The economic analysis of impacts must identify:

      i. economic impact of the relocation or closing of businesses;
      ii. loss of jobs;
      iii. loss of revenues onto the City of Commerce;
      iv. loss of revenues that each affected business generates;
      v. number of jobs that will be affected;
      vi. loss of property taxes;
      vii. loss of City licensing fees and permits fees;
      viii. impacts of temporary construction that may negatively impact business operations;
      ix. decrease of land values for the surrounding area attributed with being located near or next to an undesirable use such as a rail yard with container storage and potentially a maintenance facility;
      x. worsening of socioeconomic impacts and disparities onto Commerce residents; and
      xi. cumulative long-term and short-term economic impacts of this project on the City overall.

   c. What is the process involved with assisting displaced businesses in Commerce find a new location? Will best efforts be made to keep the businesses in Commerce?

   d. What entity will purchase or partially purchase the affected properties? Will eminent domain be used?

1166

7. The EIR/EIS identifies significant and unavoidable impacts related to the new storage/stating tracks near Hobard Yard which could potentially expose people nearby to

1166 increased diesel emissions. The following are comments/questions regarding these impacts:

a. The EIR/EIS does not analyze an alternative to new storage/staging tracks at Hobard Yard. This EIR/EIS is flawed and must analyze alternatives if there are significant and unavoidable impacts related to adding new storage/staging tracks at Hobard Yard. Under the California Environmental Quality Act (CEQA), the EIR/EIS must evaluate feasible alternatives and identify ways to avoid or substantially lessen significant unavoidable impacts.

1167 b. BSNF container holding area must stay at its existing location and should not be relocated to the north.

1168 8. The City is not in favor of Alternative A which places the Shared Passenger Track on 26th Street in Vernon and urges the HSRA to opt to build Alternative B at 15th Street in Los Angeles. The City is concerned about the impacts to Commerce residents and persons working in the area as follows:

a. Health concerns over the increased exposure to poor air quality due pollution from diesel emissions, added noise from rail car and container movements, vibrations caused my movement of containers, dust created by metals and breaks of rail cars, fumes from rail car movements and maintenance activities; and

1169 b. Increased socioeconomic disparities and inequity created by placing a rail maintenance facility near Commerce. The City has already been unfairly impacted by heavy manufacturing and industrial uses, rail yards and railroad lines which dissect the City in many areas, freeways which segregate areas of the City and contribute to poor air quality, among others.

1170 9. **The Commerce Viaduct Project:** The City strongly supports the successful and expeditious delivery of the Commerce Viaduct Project. This state-funded infrastructure investment is essential to improving safety, reliability, and operational efficiency along the corridor. The Commerce Viaduct is a critical goods-movement asset, reducing conflicts between freight and passenger rail operations, and is necessary to sustain economic competitiveness and supply-chain resilience across Southern California and beyond. Although the Commerce Viaduct is a high-priority, high-value project, it will require the relocation of the existing Commerce Metrolink Station as a formal mitigation to the project. The proposed site for the new station warrants reconsideration.

1171 10. **Commerce Metrolink Station Relocation – Mitigation:** The City opposes *Alternative 5: Maple Avenue* as the proposed relocation site for the existing Commerce Metrolink Station. As documented in *Appendix 2C - Buena Park Metrolink Station Relocation and Commerce Metrolink Station Relocation Analysis* of the Draft EIR/EIS, this alternative proposes to place a regional passenger rail station in an area that is surrounded by heavy

1171 industrial land uses, has no transit and active transportation connectivity, and lacks planning framework to support transit-oriented or mixed-use development. The Maple Avenue alternative is inconsistent with California's Transportation Plan 2050, the State Rail Plan, and statewide climate, housing, and economic development goals. Moreover, it introduces new community impacts without delivering commensurate public benefit and does not maximize ridership potential, system performance, or the return on public investment. The City strongly recommends that CAHSR undertake a Supplemental EIR/EIS that evaluates a new alternative that is currently the subject the Pico Rivera Regional Rail Station Feasibility Study – a technical analysis led by Los Angeles Metro. The Study identified a suitable site within the City of Pico Rivera to serve as the formal mitigation to the relocated Commerce Metrolink Station. The Pico Rivera location offers superior regional connectivity, freight decongestion and optimization benefits, multimodal integration potential, consistency with adopted and emerging land-use and mobility plans and demonstrated ability to support meaningful transit-oriented development. This Metro Feasibility Study was conducted in close coordination with CAHSR, Metrolink, Amtrak-LOSSAN, the cities of Commerce, Montebello, Pico Rivera, and the Gateway Cities Council of Governments. Based on local consensus and technical analysis, the Pico Rivera station alternative maximizes long-term regional benefits and minimizes adverse community impacts while enabling the timely delivery of the Commerce Viaduct Project.

1172 11. Identify the positive impacts that the HSRA project will bring to the City of Commerce including health, socioeconomic, economic aesthetic and other impacts to local residents, businesses, infrastructure and others.

1173 12. Overall, the City is deeply concerned about negative long-term and short-term impacts to its residents, businesses, economy, infrastructure, aesthetics, and future build out potential. The Draft EIR/EIS does not fully analyze alternatives to minimize the impacts on the City of Commerce. The Draft EIR/EIS must analyze additional alternatives that reduce impacts to the City of Commerce.

Please contact me should you have any questions regarding the contents of this letter or any other related matters at jserrano@commerceca.gov or (323) 722-4805.

Thank you,

J. Serrano

Jessica Serrano
Director of Community Development

cc: Ernie Hernandez, City Manager, Shahid Abbas, Director of Public Works, Claude McFerguson, Director of Transportation

22.37 Response to Submission 013878 (Jessica Serrano, City of Commerce, Feb 3, 2026)

22.37.1 1156

The California High-Speed Rail Authority (Authority) appreciates the City of Commerce's participation at the open house/public hearing. Refer to Section 22.41, Response to Submission 013944 (Jessica Serrano, City of Commerce, Feb 10, 2026), for responses to the city's oral comments.

22.37.2 1157

The online Interactive Map was released alongside the Draft Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS) as an additional tool to help the public identify potentially affected parcels. The Interactive Map does not display city limit boundaries, but does identify the city associated with each affected parcel. The ability to toggle city limit boundaries will be considered in future updates to the Interactive Map. This comment does not address the sufficiency of the Draft EIR/EIS, nor does it suggest edits to the document; accordingly, no change has been made to the document in response to this comment.

22.37.3 1158

Refer to Standard Response LAA-Response-GENERAL-07: Construction Schedule, in Chapter 18, Standard Responses.

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18.

The commenter mentions impacts on three parcels but only provides two different parcel numbers; the Authority assumes the third parcel is 6332-004-901 based on the area of concern. Impacts on parcels 6332-006-900, 6332-004-901, and 6332-004-902 are depicted in Volume 3.1, Part 2 of the Preliminary Engineering for Project Definition, specifically on sheets RW-M1532 and RW-M1533. These parcels are the site of the current Commerce Metrolink Station, which would be relocated to the east. After the station is relocated, the parcels would be needed to support the Commerce Flyover and modifications to Commerce Yard, because the right-of-way in this area would be expanded to the south to accommodate the flyover structure and shifted BNSF Railway (BNSF) tracks. Refer to Table 2-19 of the Draft EIR/EIS, which has some details regarding the timing of acquisitions.

No changes have been made to the Draft EIR/EIS in response to this comment.

22.37.4 1159

The commenter requests more information on traffic impacts in Commerce, and that impacts be mitigated so that a minimum level of service (LOS) C is achieved. Note that under the California Environmental Quality Act (CEQA), automobile delay is not considered as a significant effect on the environment. Accordingly, mitigation of LOS impacts is not required. However, traffic delay is considered an environmental impact under the National Environmental Policy Act (NEPA). The Draft EIR/EIS included mitigation measures under NEPA to improve conditions.

Impacts on roadways are included in Draft EIR/EIS Section 3.2, Transportation. Section 3.2.4.4, Methods for Evaluating Impacts Under NEPA, defines the criteria the Authority uses to determine if a traffic effect would occur under NEPA. For intersections, an adverse effect would occur if the addition of the project would result in LOS E or F and an increase in the average traffic delay of 4 seconds (for signalized intersections) or 5 seconds (for unsignalized intersections) over the baseline condition. Both of these conditions need to be satisfied for an adverse effect to occur that requires consideration of mitigation. Based on these criteria, the project would result in adverse traffic effects at two intersections in Commerce: G89, Garfield Avenue/Washington Boulevard, and G210, Eastern Avenue/driveway. The Draft EIR/EIS discusses this under Impact TR-10 and Impact TR-11; refer also to Figure 3.2-6.

Mitigation measures are proposed for both of these affected intersections, which include TRAN-MM#2, Restripe Intersections; TRAN-MM#4, Add Exclusive Turn Lanes to Intersections; and TRAN-

MM#3, Add Signal to Intersection to Improve Level of Service/Operation; these are described in detail in Section 3.2.7, Mitigation Measures.

No changes have been made to the Draft EIR/EIS in response to this comment.

22.37.5 1160

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-02: Impacts on Businesses, in Chapter 18.

Draft EIR/EIS Section 3.12, Socioeconomics and Communities, states that a total of 115 businesses would be displaced in Commerce, with an estimated loss of 1,101 jobs. As a point of clarification, some of these displacements would occur in different parts of the city, and are not associated with the BNSF truck relocation. Impact SO-3 discloses that there would be a deficit of suitable commercial sites for relocation within the city. However, suitable relocation sites for those businesses have been identified in surrounding cities with similar zoning and land use for commercial businesses—Montebello, Bell, Norwalk, Whittier, and Los Angeles. Incorporation of SOCIO-IAMF#3, Relocation Implementation Plan, will provide relocated business owners with individualized relocation assistance with the objective of minimizing the permanent closure of businesses and the economic disruptions to displaced businesses, and will provide regulatory compliance assistance to businesses that require complex permitting to relocate.

22.37.6 1161

Draft EIR/EIS Section 2.6.3.6, State Highway or Local Roadway Modifications, states that as part of the modifications to Hobart Yard, street closures are proposed between Sheila Street and Washington Boulevard (as also depicted on Figure 2-62). The Authority will request a street vacation for these streets that are proposed to be within the relocated BNSF truck parking area.

22.37.7 1162

The comment asserts that a new BNSF container holding area would alter land use patterns and the aesthetics of the Washington Boulevard area in Commerce.

As depicted on Figure 3.13-A1, sheets 4 and 5, of Appendix 3.13-A, Existing Land Uses and Zoning of Project Temporary Uses and Permanent Acquisitions Figures, affected lands are designated for industrial, mixed commercial, and transportation (railroad) uses. The proposed project would be consistent with these land uses and therefore would not substantially alter land use patterns in this area.

Regarding the assertions of aesthetic impacts, Section 3.16.4.3, Methods for Impact Analysis, notes that the portion of Washington Boulevard west of Interstate (I-) 710 is within the Gateway Cities Landscape Unit. The visual character of this landscape unit is defined by an established industrial corridor surrounding the existing railway.

Visual conditions in the vicinity of Washington Boulevard are represented by key viewpoint (KVP) 5, which depicts views experienced by industrial and commercial employees and by motorists and pedestrians traveling through the corridor.

As discussed in the visual analysis, these viewer groups have low sensitivity and are accustomed to large-scale transportation, rail, and industrial infrastructure. The existing visual environment at KVP 5 includes existing railroad tracks, bridges, overhead utilities, and other industrial features. Consistent with Authority methodology, KVP 5 was selected because it is representative of typical viewing conditions in Commerce west of I-710. The viewer groups, visual character, and key viewing conditions along Washington Boulevard, west of I-710, are adequately and directly represented by this KVP.

The proposed container holding area would be visually similar in character to existing rail-related and industrial uses present in the corridor. In addition, the scale and size of the proposed container holding area would not substantially alter or degrade existing views and is not expected to contribute to significant visual quality impacts. Accordingly, the visual analysis adequately discloses the project's aesthetic impacts along Washington Boulevard.

Regarding potential changes to land use patterns in this area, refer to Draft EIR/EIS Section 3.13, Station Planning, Land Use, and Development. Within this section, refer to Impact LU-4, which concludes that project-related land use changes do not have significant potential to alter existing land use patterns.

No changes have been made to the Draft EIR/EIS in response to this comment.

22.37.8 1163

The comment asserts that the Draft EIR/EIS does not properly analyze the City of Commerce's long-range plans, further noting that proposed storage tracks near Hobart Yard are inconsistent with adopted City of Commerce plans and policies.

As described in Section 3.13, an EIR/EIS must discuss the inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans pursuant to State CEQA Guidelines Section 15125(d) and 64 *Federal Register* 28545, 14(n)(15)). The land use consistency analysis considered plans and policies that were adopted at the time of report preparation; these are presented in Section 3.13.3, Consistency with Plans and Laws, and in Appendix 3.1-A, Regional and Local Policy Inventory and Consistency Analysis.

The comment appears to refer to the updated general plan Housing Element and associated zoning changes that appear to have been approved in November 2025, nearly concurrent with the public release of the Draft EIR/EIS.

The City of Commerce's recently adopted general plan update was nevertheless evaluated with respect to whether it presents significant new information for CEQA purposes, meaning a new significant environmental impact or substantial increase in the severity of an environmental impact that would result from the project. The City of Commerce's recently adopted general plan update was also evaluated to determine whether supplementation would be required because the plan represents new information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIR/EIS or would result in significant environmental impacts not evaluated in the EIR/EIS. The general plan update does not present significant new information under CEQA and does not trigger supplementation under NEPA. The recently adopted general plan update included no zoning changes to the sites proposed for project elements or to adjacent properties. The zoning changes all appear to be approximately 0.8 mile east of I-710 and the proposed light maintenance facility (LMF) at 26th Street. The areas under consideration for the Shared Passenger Track Alternatives remain zoned as depicted on Figure 3.13-A2, sheets 3, 4, and 5, of Appendix 3.13-A of the Draft EIR/EIS.

As such, there would be no direct conflict between the Shared Passenger Track Alternatives, which would occupy lands zoned Commercial Manufacturing (C/M1) and Heavy Manufacturing (M2), and current zoning designations along Washington Boulevard.

The comment further contends that the relocated BNSF container parking areas would conflict with the City of Commerce's beautification efforts. As described in Section 2.6.3.8, Land Use and Community Modifications, and evaluated in Section 3.13.3 and Appendix 3.1-A of the Draft EIR/EIS, these areas consist of industrial and commercial land and there would be no conflict with zoning of the applicable properties. The Draft EIR/EIS therefore adequately disclosed the project's relationship with the City of Commerce's adopted general plan. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.37.9 1164

The commenter requests streetscape drawings and photo simulations of the proposed BNSF container holding area from Washington Boulevard and nearby collector streets.

As stated in Draft EIR/EIS Section 3.16.4.3, the Authority evaluates visual impacts using representative KVPs within defined landscape units rather than providing streetscape drawings or simulations for every roadway or frontage where the project may be visible.

Washington Boulevard and adjacent streets west of I-710 in Commerce are within the Gateway Cities Landscape Unit, which is characterized by a variety of land uses, including residential neighborhoods, mobile-home communities, parks, trails, schoolyards, commercial businesses, and light industrial/ manufacturing land uses.

Visual conditions in this area are represented by KVP 5, which represents views experienced by low-sensitivity industrial, commercial, and roadway viewer groups accustomed to large-scale rail and industrial infrastructure.

In addition, as depicted in KVP 5 in Section 3.16.6.3, Project Impacts, the proposed BNSF container holding area, including fencing, limited landscaping, and stacked containers, would be visually consistent with existing container storage and rail facilities already present along Washington Boulevard.

The proposed container holding area would be visually similar in character to existing rail-related and industrial uses present in the corridor. In addition, the scale and size of the proposed container holding area would not substantially alter or degrade existing views and is not expected to contribute to significant visual quality impacts. Accordingly, the visual analysis adequately discloses the project's aesthetic impacts along Washington Boulevard at the proposed BNSF container holding area. No revisions to the Draft EIR/EIS are required in response to this comment.

22.37.10 1165

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-02: Impacts on Businesses, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-03: Property Values, in Chapter 18.

This comment includes several distinct questions (a through d). Each question is addressed below.

The comment states that business displaced in Commerce will cause significant economic impacts. The Draft EIR/EIS considered potential economic effects, identifying several in Section 3.12. These include disruption or division of existing communities from construction (Impact SO-1), business displacements and relocations (Impact SO-3), job creation during construction (Impact SO-5), property value changes and property tax losses (impact so-7), County and City Sales Tax Effects (Impact SO-8), disruption or division of existing communities during operations (Impact SO-10), job creation during operations (Impact SO-11), and unplanned growth (Impact SO-13).

Impacts SO-3, SO-5, SO-7, SO-8, and SO-11 do not include CEQA significance conclusions in accordance with Section 15064(e) of the State CEQA Guidelines, which states, "economic and social changes resulting from a project shall not be treated as significant impacts on the environment."

The comment states that the EIR/EIS must include a city-specific economic analysis of impacts on Commerce. Neither CEQA nor NEPA requires city-specific economic analyses. Notably, Chapter 5, Community Analysis, describes impacts at the block group level so as to highlight any disproportionate and adverse effects on specific neighborhoods.

The comment asks about assistance for displaced businesses. The Shared Passenger Track Alternatives incorporate standardized features to avoid and minimize impacts (impact avoidance and minimization features [IAMF]) that are considered to be part of the project. The Authority will incorporate IAMFs during project design and construction; therefore, the analysis of impacts of the Shared Passenger Track Alternatives factors in applicable IAMFs. Appendix 2-A, Impact Avoidance and Minimization Features, provides a detailed description of IAMFs that are included as part of the project design. SOCIO-IAMF#2, Compliance with Uniform Relocation Assistance and Real Property Acquisition Policies Act, requires adherence to that act to reduce potential socioeconomic impacts by providing relocation assistance for people displaced through right of-way acquisition. SOCIO-IAMF#3 requires development of a relocation implementation plan to minimize the economic disruption related

to relocation. The Authority will also incorporate CA-IAMF#4, Business Relocation/Displacement Assistance. Pursuant to SOCIO-IAMF#3, the Authority will develop a relocation mitigation plan. The plan will include a subsection dedicated to addressing adverse effects on businesses in the communities (as defined in CA-IAMF#1, Authority Community Ombudsperson and Contractor's Community Liaison).

The Authority will purchase affected properties through a right-of-way acquisition process. The state and federal constitutions, as well as various statutes including the California Eminent Domain Law, the California Relocation Assistance Act, and the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act, authorize public agencies to purchase private property for public use and require public agencies to protect the rights of each citizen from whom property is being acquired. For information on the right-of-way acquisition process, refer to Draft EIR/EIS Section 2.9.2, Right-of-Way Acquisition for Construction, Operation, and Maintenance of High-Speed Rail.

No revisions to the Draft EIR/EIS are required in response to this comment.

22.37.11 1166

The comment asserts inadequate assessment of alternatives to the proposed relocation of storage/staging tracks near Hobart Yard. Throughout the development of the project alternatives, the Authority has considered several options for storage and staging tracks (refer to Draft EIR/EIS Sections 2.5.2.6, 2023 Los Angeles to Anaheim Supplemental Alternative Analysis Report, and 2.5.2.7, 2024 Preliminary Impacts Assessment Report, Selection of Preferred Alternative, and Subsequent Design Refinements). Approximately 90,940 track feet would be removed and relocated as part of the project, and there are extremely limited options along this built-out corridor that provide the necessary length and width for the relocated tracks. The Authority has examined the area north of Hobart Yard along Washington Boulevard, a Southern California Edison utility corridor, and through the Arts District in Los Angeles. All these alternative locations were determined to be infeasible because of insufficient space, operational conflicts, and substantial impacts on utilities, historic resources, and properties. The Authority chose the existing Hobart Yard because it is the only location that is able to balance the right-of-way impacts with operational benefits. As described in Draft EIR/EIS Section 2.6.3.5, Freight or Passenger Railroad Modifications, relocating the tracks next to Hobart Yard would reduce the miles that empty trains need to travel in order to be stored, because all BNSF operations can be consolidated at one location. Additionally, many of the parcels near Hobart Yard are already owned by BNSF, which minimizes the need for acquisitions of nonrailroad land uses. All other locations would result only in impacts and no operational benefits.

Regarding the assessment of potential health risks, refer to the Draft EIR/EIS's discussions of Impact AQ-15 and associated mitigation measure AQ-MM#4, Requirement of a Future Operational Health Risk Assessment (HRA), as well as to the responses to comments #0541 and #0543 in Section 22.13, Response to Submission 013785 (Jivar Afshar, South Coast Air Quality Management District, Jan 30, 2026), in this chapter.

No revisions to the Draft EIR/EIS are required in response to this comment.

22.37.12 1167

After the Authority identified the area adjacent to Hobart Yard as the site for the new consolidated storage and staging tracks (refer to response to comment #1166 above for more information on this process), the Authority began coordinating with BNSF on where to relocate its truck parking. The existing truck parking area south of Hobart Yard is needed to accommodate the new shared passenger tracks, shifted BNSF mainline tracks, the new consolidated storage and staging tracks, and the realigned 26th Street. In May 2020, BNSF provided a high-speed rail parking mitigation site plan that identified the area north of Hobart Yard as the most suitable location to relocate the BNSF truck parking. Truck parking is essential to Hobart Yard operations and must be close to the yard. The area north of Hobart Yard was identified as the most suitable site, because it is adjacent to Hobart Yard and has sufficient space to accommodate all the relocated parking. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.37.13 1168

The commenter states a preference for Shared Passenger Track Alternative B, citing concerns regarding air quality impacts from diesel emissions, dust, and fumes, as well as noise and vibration from rail cars. To clarify, under Shared Passenger Track Alternative B, the modifications to Hobart Yard would still occur, which include the new storage and staging tracks south of Hobart Yard and relocating the BNSF truck parking to the north along Washington Boulevard. The potential impacts that would occur in Commerce would be nearly the same between the two alternatives, with only slight differences related to construction at the Exide site in Vernon, as discussed in Section 3.10, Hazardous Materials and Wastes.

Impacts related to air quality and noise and vibration are discussed in Section 3.3, Air Quality and Global Climate Change, and Section 3.4, Noise and Vibration, respectively, of the Draft EIR/EIS.

22.37.14 1169

The comment asserts that the 26th Street LMF (part of Shared Passenger Track Alternative A) would increase socioeconomic disparities and, in turn, adverse effects.

Refer to the response to comment #1166 above regarding the Authority's evaluation of multiple sites for the relocated storage and staging tracks and the selection of the site south of the existing Hobart Yard that provides the best balance of potential impacts and benefits of the project. This location provides benefits for all operators as well as corridor cities, because it would reduce the distance empty trains would need to travel within the corridor. Pertinent sections of the Draft EIR/EIS evaluate the relocation of these tracks and disclose any identified impacts. Specific to the cited concerns of socioeconomic disparities, Draft EIR/EIS Chapter 5 examined project impacts at the block group level, focusing on prospective disproportionately high and adverse effects (DHAE) on minority and low-income communities.

With regard to the comment's air quality concerns, refer to Impact AQ-15. Operational HRAs were conducted to evaluate the cancer risk and chronic noncancer risk from diesel particulate matter (DPM) emissions generated by the yard equipment activities at Hobart and Commerce Yards to determine the change in health risks caused by reconfiguration of the yards. As presented in Table 3.3-46, the HRAs indicate that health risks would decrease in future years when the project is operational compared to existing conditions, and operation of Shared Passenger Track Alternative A would not result in an incremental increase in cancer risk or chronic noncancer risks. Details of the analysis are provided in the HRAs in Appendix F of the *Los Angeles to Anaheim Project Section Air Quality and Global Climate Change Technical Report*.

However, as discussed in Draft EIR/EIS Section 3.3.6.3, Project Impacts, the HRA results do not include or account for activities associated with the displaced freight storage and staging tracks that would be relocated adjacent to the Hobart Yard Intermodal Facility. Under Impact AQ-15, the project would consolidate staging and storage tracks from throughout the corridor to near Hobart Yard. The total linear feet of such tracks is estimated at 101,094 feet. Because the level of activity for the 101,094 feet of storage and support track at Hobart Yard is unknown at this time, an operational HRA cannot be conducted without speculation. As discussed in response to comment #0541 in Section 22.13, once an integrated operating plan is developed, then input data necessary to conduct an operational HRA inclusive of the activity associated with the freight storage and staging tracks would become available. Accordingly, absent a reliable conclusion about the health effects of these consolidated tracks, the potential remains that nearby sensitive receptors would be exposed to DPM emissions at a level exceeding the South Coast Air Quality Management District's (SCAQMD) project-level thresholds, thus resulting in a health risk impact. As mitigation for this impact, the Authority would implement AQ-MM#4, which requires that an operational HRA be conducted prior to the commencement of project operations. AQ-MM#4 also requires the analysis and incorporation of additional feasible mitigation to reduce risks to the greatest extent practicable prior to project operations. AQ-MM#4 has been revised to state that the Authority will complete additional CEQA review, NEPA review, or both, as necessary, if the supplemental HRA demonstrates that health risks would exceed the health risk exposure levels identified in the Draft EIR/EIS. Please refer to Section 16.5.3, Section 3.3: Air Quality and Global Climate Change, in Chapter 16, Corrections and Additions

to the Draft Report, of the Final EIR/EIS for these changes. Refer to the response to comment #0541 in Section 22.13 in this chapter regarding this mitigation measure.

Until appropriate freight rail activity data can be developed and analyzed in a future subsequent HRA, the Draft EIR/EIS assumes that exposure to DPM emissions would constitute a DHAE on the Hobart area of Commerce for purposes of Chapter 5 of the EIR/EIS. However, the future operational HRA may determine that impacts are below the SCAQMD project-level thresholds and no additional on-site or off-site mitigation would be required. If that should occur, there would not be a DHAE from exposure to DPM emissions.

Chapter 5 further summarizes and describes these impacts at the block group level; refer to Section 5.6.3.2, Air Quality; Section 5.7, Summary of Disproportionately High and Adverse Effects Prior to Consideration of Measures to Minimize Harm; and Table 5-35.

22.37.15 1170

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

The Authority appreciates the commenter's support for the Commerce viaduct.

22.37.16 1171

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18.

The Authority respectfully disagrees with the comment that the Maple Avenue alternative for relocating the Commerce Metrolink station is inconsistent with *California Transportation Plan 2050* (CTP 2050), the State Rail Plan, and statewide climate, housing, and economic development goals. The statewide high-speed rail system, including the Los Angeles to Anaheim Project Section (project section), is an integral element of achieving the state's long-range plans for a sustainable transportation system, as reflected in CTP 2050 and the State Rail Plan. The 2022 Scoping Plan for Achieving Carbon Neutrality identifies fossil-fuel free passenger rail as essential to meeting the state's net-zero greenhouse gas emissions requirement. Relocating the Commerce Metrolink station to Maple Avenue does not alter the overall consistency of the project section with state plans and laws. The Maple Avenue alternative for relocating the Commerce Metrolink station is less than a mile along the rail corridor from the current station in an area that the Authority has recognized as having industrial land uses and modest transit-oriented development potential (refer to Draft EIR/EIS Appendix 2-C, Buena Park Metrolink Station Relocation and Commerce Metrolink Station Relocation Analysis).

22.37.17 1172

The commenter requests identification of positive impacts the project will have on Commerce. For a summary of project benefits, including benefits to Commerce, refer to Draft EIR/EIS Section S.8.1, High-Speed Rail Benefits; and Section 5.7.5, Project Benefits. Benefits include improved intercity travel for Californians, reduced vehicle miles traveled within Orange County and Los Angeles County, benefits to air quality by decreasing greenhouse gas emissions, a net reduction in energy usage, and creation of jobs and expenditures that contribute to regional economic growth.

22.37.18 1173

The Authority acknowledge the city's concerns, and has thoroughly analyzed potential impacts of the project in the EIR/EIS, with IAMFs and mitigation measures proposed to avoid, minimize, and reduce effects. Refer to responses to the following comments above for how impacts were analyzed and addressed in the Draft EIR/EIS: #1159 regarding traffic impacts; #1160 and #1165 regarding residential and business displacements and economic disruption; #1162 and #1164 regarding aesthetics impacts; #1163 regarding land use impacts; #1166 regarding impacts associated with new storage and staging tracks adjacent to Hobart Yard; and #1169 regarding DHAE effects and air quality impacts. Shared Passenger Track Alternatives A and B evaluated in the Draft EIR/EIS are the result of lengthy consideration, screening, and refinement of potential alternatives in the project

section as a whole. As discussed in Section 2.5, Alternatives Considered During Alternatives Screening Process, the Authority has endeavored to minimize community impacts from the project section by decreasing the width of project alternative footprints, thereby avoiding and minimizing impacts on sensitive land uses, including residential uses, to the maximum extent possible while also achieving the project purpose and objectives. In the constrained urban corridor between Los Angeles and Anaheim, the range of alternatives presented in the Draft EIR/EIS is reasonable.

Los Angeles to Anaheim - RECORD #013933 DETAIL

Status:	Unread
Record Date:	02/10/2026
Interest As:	Local Agency
Full Name:	Ryan Erasmo

Stakeholder Comments/Issues:

Hello Cal HSR, Please see LASD comments for the Cal HSR - LA to Anaheim Project Section DEIR. Regards, Ryan R. Erasmo | Departmental Facilities Planner Facilities Planning Bureau Email: rrerasmo@lasd.org | Phone: (323) 526 5614 Los Angeles County Sheriff's Department 4700 Ramona Blvd. 4th Floor Monterey Park, California 91754 RDO: Friday CONFIDENTIALITY NOTICE: This email message, including any attachments, from the Los Angeles County Sheriff's Department is intended for the official and confidential use of the recipients to whom it is addressed. It contains information that may be confidential, privileged, attorney work product, or otherwise exempted from disclosure under applicable law. If you have received this message in error, be advised that any review, disclosure, use, dissemination, distribution, or reproduction of this message or its contents is strictly prohibited. Please notify the sender of this email immediately by reply email that you have received this message in error, and immediately destroy this message, including any attachments. Thank you in advance for your cooperation.

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COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF

February 3, 2026

Ms. La Donna DiCammillo
Southern California Regional Director
California High Speed Rail Authority
355 S. Grand Avenue, Suite 2050
Los Angeles, California 90071

Attn: Los Angeles to Anaheim Draft EIR/EIS Comment

CALIFORNIA HIGH SPEED RAIL
LOS ANGELES TO ANAHEIM PROJECT SECTION
DRAFT ENVIROMENTAL IMPACT REPORT
REVIEW COMMENTS

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the December 2025 California High Speed Rail (CHSR) – Los Angeles to Anaheim Project Section (Project) Draft Environmental Impact Report (DEIR). The proposed Project is approximately 30 miles of new and upgraded track, overhead contact system, maintenance and traction power facilities (including a light maintenance facility at 26th Street in the City of Vernon), additional freight rail track (including storage track replacement at Hobart Yard), grade separations and roadway modifications, drainage improvements, communications towers, security fencing, relocations of and modifications to passenger train stations, and other necessary facilities to introduce CHSR service into the existing Los Angeles — San Diego — San Luis Obispo Rail Corridor from south of Los Angeles Union Station beginning at the northern edge of U.S. Highway 101 to Anaheim Regional Transportation Intermodal Center. New and upgraded tracks would allow other trains to share tracks with CHSR with an option for one intermediate CHSR station, which would consist of adding a CHSR station platform and station facilities at either the Norwalk/Santa Fe Springs

Metrolink Station or the Fullerton Metrolink/Amtrak Station. This proposed Project would be run through the following Project Areas in Los Angeles County (County): East Los Angeles, Pico Rivera, Los Nietos, West Whittier and Norwalk.

1949 As indicated in Section 3.11 Safety and Security on page 47, The Los Angeles Police Department and the Los Angeles County Sheriff's Department established an agreement in February 2017 concerning jurisdiction over rail and other transit systems in Los Angeles County. The safety of the residents of the County of Los Angeles and visitors should be of high priority to all stakeholders. The CHSR Authority should proactively partner with the Los Angeles County Sheriff's Department and other local law enforcement agencies to develop formal agreements, coordinated safety protocols, and clear lines of authority prior to operations. This collaboration should include joint security planning, emergency response and evacuation procedures, interoperable communications, and regular training and exercises to ensure the safety of residents, passengers, and visitors at Union Station, Norwalk Station, and along the rail corridor. The proposed rail system would impact our Department's Metrolink operations and should be discussed.

1950 As indicated in Section 3.11 Safety and Security on page 123 (Impact SS-17), Operation could result in the potential for railroad-related accidents in the project area. With a detailed and coordinated project design, this would minimize the potential for incidents related to the CHSR. Project operations would not likely increase the frequency of incidents with motor vehicles, pedestrians, bicyclists, or other trains such that the demand for emergency services would increase. Emergency responses to rail are indicated to be similar to existing emergency response services for such incidents. However, the anticipated increase in rail service may elevate the potential of rail accidents and incidents for these project sections and may require an increase in local law enforcement services. Should the project be approved, the Department is currently understaffed, and the lack of facility space for additional law enforcement personnel, support staff, and equipment assets will need to be addressed to mitigate the impacts of this Project, as well as cumulative impacts.

The Department's Contract Law Enforcement Bureau shall be contacted to re-evaluate the cost implications for our resources and operations to

1950 amend City service contracts as necessary. However, our Department has a moratorium on new law enforcement service contracts and may not be able to meet the law enforcement needs the CHSR would generate.

1951 A Construction Traffic Management Plan should also be established as part of the proposed Project to address construction-related traffic congestion and emergency access issues. If temporary lane closures are necessary for the installation of utilities, emergency access should be maintained at all times. Flag persons and/or detours should be provided as needed to ensure safe traffic operations, and construction signs should be posted to advise motorists of reduced construction zone speed limits.

The Department has no other comments at this time, but we reserve the right to do so should additional and/or new information become available for the proposed Project.

Please continue to send future requests for review comments and other related correspondence to:

Jennifer Fang, Bureau Director
Facilities Planning Bureau, 4th Floor, SBB
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

Should you have any questions regarding this matter, please contact me at (323) 526-5758, or your staff may contact Mr. Ryan R. Erasmo of my staff, at (323) 526-5614.

Sincerely,

ROBERT G. LUNA, SHERIFF

Jennifer Fang, Bureau Director
Facilities Planning Bureau

22.38 Response to Submission 013933 (Ryan Erasmo, Los Angeles County Sheriff's Department, Feb 10, 2026)

22.38.1 1949

As described in Section 3.11, Safety and Security, of the Draft Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS), the California High-Speed Rail Authority (Authority) will incorporate SS-IAMF#2, Safety and Security Management Plan, as part of the project, which will require the Authority-designated contractor to prepare a safety and security management plan. The full details of SS-IAMF#2 are included in Appendix 2-A, Impact Avoidance and Minimization Features. Per SS-IAMF#2, the Authority will coordinate with the local and regional emergency service providers to establish an efficient and coordinated response protocol, systems, and procedures across the multiple agencies, including developing and implementing the System Safety Program Plan, Security and Emergency Preparedness Plan, and Safety and Security Management Plan for the project.

22.38.2 1950

Refer to Standard Response LAA-Response-Section 3.11 S&S-01: At-Grade Crossing Safety, in Chapter 18, Standard Responses.

In Section 3.11 of the Draft EIR/EIS, the Authority considered potential impacts on rail-related incidents and local emergency services, such as police and fire services. The design characteristics of the project would minimize the potential for rail accidents and rail incidents, because the alignment would include five new grade separations and one partial grade separation. Project operations would not increase the frequency of incidents with motor vehicles, pedestrians, bicyclists, or other trains that would require an additional need for new or expanded emergency service facilities or staffing. In Anaheim, where eight crossings would remain at grade, there could be an increased potential for rail-related incidents. Incorporation of SS-IAMF#2 would minimize the likelihood of incidents and ensure coordinated response.

At-grade crossings could also result in potential delays on local emergency services, particularly in Anaheim; however, they are not expected to result in inadequate or impaired emergency response such that expansion of emergency service facilities would be necessary in Anaheim. The project would implement SS-MM#1, Implement Emergency Response Time Mitigation Strategies, to establish baseline travel times of emergency vehicles through the at-grade crossings in Anaheim and develop an emergency vehicle priority treatment plan to mitigate any potential exceedances of the baseline as a result of the project.

22.38.3 1951

As described in Section 3.2, Transportation, and Section 3.11 of the Draft EIR/EIS, TR-IAMF#2, Construction Transportation Plan, requires implementation of a construction transportation plan. The construction transportation plan will include a traffic control plan with multiple required elements, including requirements for flag persons, traffic speed limitations, and provisions for 24-hour access by emergency vehicles.

Additionally, SS-IAMF#1, Construction Safety Transportation Management Plan, requires implementation of a construction safety transportation management plan to ensure traffic and alternate emergency vehicle routes are maintained during construction. No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013941 DETAIL

Status:	Action Pending
Record Date:	02/10/2026
Interest As:	Local Agency
Full Name:	Brian Saeki

Stakeholder Comments/Issues:

[Please refer to the attached transcript for the demarcation of oral comments delivered by this submitter during the public hearing.]

CALIFORNIA High-Speed Rail Authority

Speaker Card

NAME: Brian Saeki		DATE: 1-22-2026
MEETING LOCATION:	AFFILIATION: City of Vernon	
ADDRESS:	EMAIL:	PHONE:
CITY: Vernon	STATE: CA	ZIP: 90058

*WOULD YOU LIKE TO BE ADDED TO OUR MAILING LIST? (Check all that apply) ○ STATEWIDE ☒ LOS ANGELES TO ANAHEIM

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**Please complete the contact information if you want someone from the Authority to contact you. Please only provide your preferred method of contact.

environmental documents.

MR. CHANNELL: Josh Channell. I'm the environmental manager for the consultant team.

MR. GALVEZ: Good evening. I'm Stefan Galvez, Director of Environmental Services for the High-Speed Rail Authority.

MS. LEE: Good evening. I'm Erin Lee, and I'm representing the NEPA assignment team who's been reviewing the preparation of the environmental document.

MS. TUCKER-MOHL: Hello, I'm Jessica Tucker-Mohl. I'm outside legal counsel to the High-Speed Rail Authority.

MS. ARELLANO: Thank you very much. Okay. We are going to begin receiving our comments in order. Again, as I mentioned, we will have a timer on the screen and please direct your comments to the panel.

Our first speaker is Brian Saeki. And let me go ahead and say the following individuals so you can be prepared to come forward. Following Brian will be Lilia Hernandez, followed by Jordann Turner, and then Jessica Serrano.

Please go right ahead, Brian.

1792

MR. SAEKI: Hi. Good evening. Brian

1792 Saeki, City Administrator for the City of Vernon. I am here on behalf of the City, not to oppose the California High-Speed Rail project, nor Link US, but really to share that we have significant concerns about the alternative that would use 26th Street area in town for the maintenance yard for the train.

1793 So, couple things, several environmental impacts that my colleague and I will share with you tonight. First, I did want to say that Vernon has had a bad rap for many years for, you know, having not environmentally-friendly businesses in town. And we've -- we've made significant strides over the years to clean up those businesses.

And so we've, again, you know, we've got, you know, significant businesses, that have not been, you know, productive in many ways, that are now gone because of things that the City's done. And so here we are considering a project that's going to add significant, unavoidable environmental impacts again, and, again, for all the reasons we're going to share with you tonight.

1794 First, we have our economic concerns are, you know, what's going to happen with all of those businesses along 26th? We know that some have already been purchased, properties have been

1794 purchased, and businesses have been shuttered that have already had a significant impact on our utility, you know, and all of our, you know, city business licenses and things like that.

So it's not only an economic impact to the City of Vernon, but also to the region. There are major, major employers and businesses in that area that, you know, significantly produce, you know, revenue for the region. So we're concerned about that.

1795 We're also concerned about the businesses on Bandini, whose backs now face a right -- a railroad right of way, not a street, a public street. And so what is going to happen to those businesses? How do we address safety issues there? All of those are -- are concerns of ours.

1796 And my last comment is our most significant for the City of Vernon, is the proposal to terminate 26th Street at Ayers.

Number one, this was the condition over 20 years ago. And 20 years ago, we partnered with Metro because of this condition to create that connection to Pennington because of the significant traffic impacts.

1797 And 20 years ago, traffic, we -- I

1797

think we would all agree -- it was significantly less than it is today. And so we have to have that resolution. We want to see, at a minimum, that connection remain just like you did on the other side along Downey. And so that is of significant concern.

1798

And, of course, with all of that, you know, address public safety issues and all of those similar related concerns that we're going to have as it relates to having 26 terminated at Ayers, which is basically like a two -- two-lane wide residential street.

It's just not possible. Lots of intersections that are impacted in that area. We, of course, we have the 710 and Bandini, you know, stoplights. It's -- it's a traffic nightmare. So thank you.

MS. ARELLANO: Thank you very much. Appreciate your comments tonight.

Next, Lilia Hernandez.

MS. HERNANDEZ: Good evening. Lilia Hernandez, Assistant to the City Administrator for the City of Vernon. As proposed, a section of the LA to Anaheim section of the high-speed rail project will have significant impacts in Vernon.

As Brian mentioned, we are concerned as

22.39 Response to Submission 013941 (Brian Saeki, City of Vernon, Feb 10, 2026)

22.39.1 1792

Potential impacts related to the changes around 26th Street and Hobart Yard are discussed in individual sections of Chapter 3, Affected Environment, Environmental Consequences, and Mitigation Measures, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). Please refer to responses to comments #1794 through #1798 below that address the City of Vernon's specific concerns raised in this oral statement.

22.39.2 1793

The California High-Speed Rail Authority (Authority) acknowledges the city's concern regarding significant and unavoidable impacts that would occur in the city as a result of the high-speed rail (HSR) project. Section 7.1.2, Significant and Unavoidable Impacts Under CEQA, of the Draft EIR/EIS summarizes the significant and unavoidable impacts of the project, which are explained in more detail in each of the relevant sections and chapters. Of these significant and unavoidable impacts, only the following would occur specifically in Vernon: Impact AQ-15 for an increase in operational freight emissions from reconfiguration of Hobart Yard, and Impact HWM-4 and Impact SS-3 for a potential to encounter hazardous materials at the Exide site during construction. As described in detail in Section 3.3, Air Quality and Global Climate Change; Section 3.9, Geology, Soils, Seismicity, and Paleontological Resources; and Section 3.11, Safety and Security, all feasible mitigation measures have been implemented to address these impacts.

Please refer to responses to comments #1794 through #1798 below for more detailed responses to the City of Vernon's concerns.

22.39.3 1794

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-02: Impacts on Businesses, in Chapter 18, Standard Responses.

As described in Impact SO-3 in Section 3.12, Socioeconomics and Communities, 19 commercial businesses and 18 industrial businesses in Vernon would be displaced, for a total of 37 displaced businesses and 911 displaced employees. As presented in Tables 3.12-27 and 3.12-28, there is a surplus of suitable industrial replacement units, but a deficit of suitable commercial replacement units for 16 commercial displacements. The Authority will incorporate SOCIO-IAMF#3, Relocation Implementation Plan, as part of the project, which will provide relocated business owners with individualized relocation assistance with the objective of minimizing the permanent closure of businesses and the economic disruptions to displaced businesses, and will provide regulatory compliance assistance to businesses that require complex permitting to relocate. For the 16 businesses without a suitable replacement unit in Vernon, suitable relocation units for those businesses have been identified in surrounding cities with similar zoning and land uses. Impacts SO-7 and SO-8 acknowledge that because 16 businesses could not be relocated within Vernon, there would be lost property tax and sales tax revenue.

22.39.4 1795

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-02: Impacts on Businesses, in Chapter 18.

As detailed in Draft EIR/EIS Section 2.6.3.5, Freight or Passenger Railroad Modifications, Shared Passenger Track Alternative A would replace the storage affected by modifying the right-of-way in a new consolidated storage area adjacent and parallel to BNSF Railway's Hobart Yard. This would occur adjacent to businesses along Bandini Boulevard. The land uses in the area are generally industrial. Therefore, the proposed 26th Street light maintenance facility (LMF) at this location would not be inconsistent with existing uses. Additionally, the 26th Street LMF would be designed and built

in accordance with applicable standards, ensuring appropriate setbacks from adjacent uses to help ensure safety. For more discussion and analysis of safety generally, refer to Draft EIR/EIS Section 3.11.

As described in Impact SO-3 in Section 3.12, 19 commercial businesses and 18 industrial businesses in Vernon would be displaced, for a total of 911 displaced employees. This includes some businesses along Bandini Boulevard in Vernon. The HSR Interactive Map (https://meethsrsocal.org/la-a-overview/la-a-interactive-map/) can be used to determine if a parcel would be a full acquisition, partially affected parcel, or temporary construction easement. As presented in Tables 3.12-27 and 3.12-28, there is a surplus of suitable industrial replacement units, but a deficit of suitable commercial replacement units for 16 commercial displacements. The Authority will incorporate SOCIO-IAMF#3 as part of the project, which will provide relocated business owners with individualized relocation assistance with the objective of minimizing the permanent closure of businesses and the economic disruptions to displaced businesses, and will provide regulatory compliance assistance to businesses that require complex permitting to relocate. For the 16 businesses without a suitable replacement unit in Vernon, suitable relocation units for those businesses have been identified in surrounding cities with similar zoning and land uses. Impacts SO-7 and SO-8 acknowledge that because 16 businesses could not be relocated within Vernon, there would be lost property tax and sales tax revenue. Additional information on right-of-way acquisitions can be found in Section 3.12; Volume 2, Appendix 3.1-B, Los Angeles to Anaheim: Footprint Mapbook; the *Los Angeles to Anaheim Project Section Draft Relocation Impact Report*; and Appendix 3.12-E, Business Displacement Maps.

22.39.5 1796

The Authority acknowledges the City of Vernon's concerns regarding the design of 26th Street. Traffic impacts were evaluated thoroughly in Section 3.2, Transportation, of the Draft EIR/EIS, with mitigation measures proposed in the city that would reduce all adverse traffic effects to below the impact thresholds. However, in response to the City of Vernon's concerns, the Authority developed a design concept that could maintain the 26th Street connection east to Pennington Way, but additional discussions are needed with the California Department of Transportation and other parties. Given the current status of the Los Angeles to Anaheim Project Section (project section), which has no funding for preliminary design or construction, the Authority has opted to maintain the design presented in the Draft EIR/EIS. The Authority commits to working with the City of Vernon in the future when this project section advances, including refining the design of 26th Street and conducting supplementary environmental analysis if required.

Section 3.2.7, Mitigation Measures, of the Draft EIR/EIS was revised in Section 16.5.2, Section 3.2: Transportation, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS to clarify that the Authority would coordinate with local jurisdictions on the traffic mitigation measure designs.

22.39.6 1797

Refer to response to comment #1796 above.

22.39.7 1798

The commenter expresses concern over public safety issues as a result of the 26th Street design at Ayers Avenue. The intersection is currently unsignalized. In addition, there is a center median along Bandini Boulevard, which limits traffic coming from Ayers Street to right turns only onto Bandini Boulevard. This existing configuration would be maintained, because the realigned 26th Street would not change the configuration of the Ayers Street and Bandini Boulevard intersection. Furthermore, as discussed in the Section 3.11.6.3, Project Impacts, of the Draft EIR/EIS, specifically under Impact SS-6, permanent roadway modifications, such as the proposed 26th Street realignment, would be designed to comply with all applicable design standards so that no traffic hazards would be introduced. Therefore, the proposed 26th Street realignment would not introduce any new elements that could increase roadway hazards because of a geometric design feature and result in safety impacts.

No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013942 DETAIL

Status:	Action Pending
Record Date:	02/10/2026
Interest As:	Local Agency
Full Name:	Lilia Hernandez

Stakeholder Comments/Issues:

[Please refer to the attached transcript for the demarcation of oral comments delivered by this submitter during the public hearing.]

CALIFORNIA High-Speed Rail Authority

Speaker Card

NAME: Lilia Hernandez

DATE: 1/22/2026

MEETING LOCATION: PUBLIC HEARING @ COMMERCE DOUBLE-TREE

AFFILIATION: CITY OF VERNON

ADDRESS:

EMAIL: lhernandez@cityofvernon.org.

PHONE:

CITY: VERNON

STATE: CA

ZIP: 90058

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COMMENTS:

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think we would all agree -- it was significantly less than it is today. And so we have to have that resolution. We want to see, at a minimum, that connection remain just like you did on the other side along Downey. And so that is of significant concern.

And, of course, with all of that, you know, address public safety issues and all of those similar related concerns that we're going to have as it relates to having 26 terminated at Ayers, which is basically like a two -- two-lane wide residential street.

It's just not possible. Lots of intersections that are impacted in that area. We, of course, we have the 710 and Bandini, you know, stoplights. It's -- it's a traffic nightmare. So thank you.

MS. ARELLANO: Thank you very much. Appreciate your comments tonight.

Next, Lilia Hernandez.

1799 MS. HERNANDEZ: Good evening. Lilia Hernandez, Assistant to the City Administrator for the City of Vernon. As proposed, a section of the LA to Anaheim section of the high-speed rail project will have significant impacts in Vernon.

As Brian mentioned, we are concerned as

1799 this is yet another transit project coming through our city that proposes to add thousands of feet of rail within our boundaries.

We heard even in today's presentation how the project alone proposes to add a hundred and one thousand, nine -- ninety-four feet of replacement tracks within Vernon to replace BNSF track removal occurring all along the project route, meaning Vernon is bearing the greatest impact.

1800 This being the case, the additional BNSF rail being added at Malabar Yard in Vernon as part of the Link US modification should also be incorporated into the changes at 26th.

1801 All that being said, if this project moves forward, High-Speed Rail should utilize electricity drawn from Vernon Public Utility to power its passenger trains coming through Vernon. Thank you.

MS. ARELLANO: Again, thank you very much.

Next, we have Jordann Turner.

MR. TURNER: Good afternoon -- good evening, everybody. First of all, I'm supportive of the project. It's a wonderful project, literally a long time in the making.

22.40 Response to Submission 013942 (Lilia Hernandez, City of Vernon, Feb 10, 2026)

22.40.1 1799

The commenter expresses concern over potential impacts on Vernon, asserting that it would be another transit project affecting that city.

As described in Chapter 2, Alternatives, of the Draft Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS), to add and electrify tracks in the existing right-of-way, the California High-Speed Rail Authority (Authority) would need to remove or modify track and right-of-way that is currently used or planned for future use by BNSF Railway (BNSF) for train storage and intermodal operations. This requires modifications to BNSF's plans for expansion at its yards in Vernon and Commerce. In several locations throughout the Los Angeles to Anaheim Project Section, Shared Passenger Track Alternative A would require removal/relocation of existing BNSF infrastructure. To maintain BNSF capacity and avoid disruptions to operations, Shared Passenger Track Alternative A would replace the affected BNSF infrastructure, primarily adjacent to Hobart Yard. Table 2-12 lists (and Figure 2-61 maps) the BNSF storage capacity that would be removed from the corridor and relocated to the new consolidated storage area adjacent to Hobart Yard. In addition to the relocations described in Table 2-12 and depicted on Figure 2-61, several BNSF yard lead and storage tracks throughout the corridor would be relocated because of the introduction of the additional mainline or other changes in the corridor to accommodate high-speed rail (HSR). These tracks would be replaced in the same areas, with the same level of storage capacity and operational functionality maintained. Table 2-13 describes existing rail spurs serving industry along the corridor that would be affected by the project.

In all, the relocated storage tracks near Hobart Yard would provide 101,094 track feet of storage, slightly more than the amount that would be removed from the corridor as a whole (90,940 track feet).

The Draft EIR/EIS fully analyzed the potential impacts of these relocation efforts, as well as other modifications to Hobart Yard. Analyses in Draft EIR/EIS Chapter 3, Affected Environment, Environmental Consequences, and Mitigation Measures, were based on an appropriate resource study area for each environmental resource topic.

Regarding the assertion of particular impacts on Vernon, Draft EIR/EIS Chapter 5, Community Analysis, examined whether any project impacts would have a disproportionately high and adverse effect (DHAE) on minority or low-income communities. The Hobart neighborhood in Vernon includes block group 60379800161. Impacts on this block group include continuous permanent impacts on signalized intersections (Impact TR-10), continuous permanent impacts on unsignalized intersections (Impact TR-11), continuous permanent impacts on roadway segments (Impact TR-12), exposure to diesel particulate matter (Impact AQ-15), construction near sites of potential environmental concern or Cortese List sites (Impact HMW-4), business displacements and relocations (Impact SO-3), and effects on visual quality during operations (Impact AVQ-3). These impacts are summarized and described at the block group level in Chapter 5; for further detail on specific impacts, please refer to corresponding sections of Chapter 3. This block group would experience a DHAE from operational air quality, hazardous wastes and materials, and business displacements, as described in Table 5-35.

Additionally, the Draft EIR/EIS considered the potential for cumulative impacts. As defined in Draft EIR/EIS Section 3.19.1, Introduction, *cumulative impacts* means impacts resulting from a combination of impacts of the proposed HSR project along with other past, present, and reasonably foreseeable future actions and projects. Cumulative impacts are summarized in Table 3.19-7 and Table 3.19-8. Cumulatively considerable significant and unavoidable construction impacts after mitigation include impacts on air quality, noise and vibration, hazardous materials and wastes, and aesthetics and visual quality. Cumulatively considerable significant and unavoidable operational impacts after mitigation include impacts on air quality, noise and vibration, and aesthetics and visual quality.

Refer to Section S.8.4, CEQA Summary of Impacts and Mitigation, for an overview of California Environmental Quality Act determinations as a result of implementation of the project as a whole. Even though the project includes features to avoid or reduce impacts (impact avoidance and

minimization features) and even with implementation of feasible mitigation measures, several impacts would nonetheless remain significant and unavoidable. Some of these significant and unavoidable impacts would not occur in Vernon, including those related to operational train noise and historic architectural resources. For the project as a whole, significant and unavoidable impacts include Impact AQ-1: Temporary Direct and Indirect Impacts on Air Quality within the Applicable Air Basin, Impact AQ-2: Temporary Direct Impacts on Implementation of an Applicable Air Quality Plan, Impact AQ-15: Continuous Permanent Direct Impacts on Localized Air Quality—Exposure to Diesel Particulate Matter (Health Risk), Impact N&V-4: Permanent Exposure of Sensitive Receivers to Noise from Project Operation, Impact N&V-5: Permanent Exposure of Sensitive Receivers and Buildings to Vibrations from Project Operation, Impact HMW-4: Construction within or Near Sites of Potential Environmental Concern or Cortese List Sites, Impact SS-3: Temporary Exposure to Construction Site Hazards, and Impact CUL-3: Permanent Demolition, Destruction, Relocation, or Alteration of Historic Architectural Resources or Setting During Construction.

22.40.2 1800

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, in Chapter 18, Standard Responses.

22.40.3 1801

The Los Angeles to Anaheim Project Section would connect to substations owned and operated by the Cities of Los Angeles and Anaheim. Power would not be required from the City of Vernon during HSR operations.

Los Angeles to Anaheim - RECORD #013944 DETAIL

Status:	Action Pending
Record Date:	02/10/2026
Interest As:	Local Agency
Full Name:	Jessica Serrano

Stakeholder Comments/Issues:

[Please refer to the attached transcript for the demarcation of oral comments delivered by this submitter during the public hearing.]

CALIFORNIA High-Speed Rail Authority

Speaker Card

NAME: Jessica Serrano

DATE: 1/22/26

MEETING LOCATION: Commerce

AFFILIATION: City of Commerce

ADDRESS:

EMAIL: jserrano@commerceca.gov

PHONE: (323) 722-4805

CITY:

STATE:

ZIP:

*WOULD YOU LIKE TO BE ADDED TO OUR MAILING LIST? (Check all that apply) ○ STATEWIDE ◉ LOS ANGELES TO ANAHEIM

**WOULD YOU LIKE THE AUTHORITY TO CONTACT YOU? ◉ YES ○ NO

COMMENTS:

Any information your provide is voluntary. This form, including all the information you may provide, may be posted on the Authority's website and/or may be subject to disclosure pursuant to the California Public Records Act.
*Please complete the email section if you want to be placed on the Authority's email list.
**Please complete the contact information if you want someone from the Authority to contact you. Please only provide your preferred method of contact.

CALIFORNIA High-Speed Rail Authority

Speaker Card

NAME: Jessica Serrano

DATE:

MEETING LOCATION:

AFFILIATION: City of Commerce

ADDRESS:

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I mean the 5 wasn't completed in one fell swoop, neither the freeways around here. In fact, you know, 105 was still, you know, completed 20 years ago, but still it was in the making.

And I think the one thing that's probably the hardest job for you guys is to realize, convince people this is a real project. You know, there's, you know, stuff going on north -- up north in Central Valley, but I think a lot of folks can't just see what's going on.

And so as you guys embark on building hopefully soon, I think kind of marketing and showing folks that this is the future of our state, kind of parallel to what the freeway system was, would help, I think, carry the message and carry the project to its completion.

So thank you all for your hard work. I know putting on a road show also is a lot of work for folks. So thank you guys for coming out and best of luck.

MS. ARELLANO: Excellent. Thank you very much.

Next speaker we have, Jessica Serrano.

MS. SERRANO: Good evening, everyone. My name is Jessica Serrano. I'm the Director of

Community Development for the City of Commerce. Thank you for this opportunity to speak before you tonight. I appreciate you choosing Commerce to do this outreach event.

1648

And just want to say that, you know, the City of Commerce is not opposed to the project, but we are deeply concerned about some of the impacts that some of the -- some of the project will have on our local residents and businesses.

The presentation mentioned 26 homes will be impacted by noise. I'd like to get more information about where those homes are located, and if there's some in Commerce, you know, we'd like to know where those are.

1649

The track removal at Hobart IMF, straddling the City of Commerce and Vernon, will eliminate a large strip of properties along Washington, the southern portion of Washington. We're concerned about the impacts that that will have on the City of Commerce, economic impacts and -- and so forth.

Also, there's -- we'd like to know more about what property acquisitions will be happening within the City of Commerce; and if there's any city properties that will be impacted, we'd like to know

1649

that as well. To date, we haven't heard of any, but we'd like to ask that direct question to the team.

1650

We also would -- you know, it -- it's a little late, but we would -- we want to advertise the comment period to our community still since there's at least a couple weeks left. So we'd appreciate if you can share any social media package that you have that we can use to upload onto the City's social media and website.

1651

And, you know, just want to emphasize that, you know, we want to ensure that the takings do not impact the -- our local economy, and we're concerned about our residents because our area's already heavily impacted.

1652

Our residents already bear the burden of a lot of truck traffic, you know, a lot of rail activity, and we want to make sure that they're not further impacted by additional noise, fumes, vibration, other environmental impacts.

1653

You know, I'd like for the team to reach out to me. I left my contact information, if you don't mind contacting me to set up a call for additional questions, we'd really appreciate that.

MS. ARELLANO: Excellent. Thank you very much.

1654

Recently, Metrolink just built a train station at LAX, and it will soon have a direct train connection with the People Mover into it. So it'd be a huge benefit for people of both Orange County and LA County to be able to take the high-speed rail train into Norwalk station, and then be able to take a connection to the Norwalk Green Line C Station to LAX.

However, I do understand there is a current gap from Norwalk Metrolink to the Norwalk Green Line Station, but it is planned by LA Metro to eventually close that gap. So by the time high-speed rail is built in -- from Los Angeles to Anaheim, I hope that both train lines can be ready and have a seamless connection.

1655

Let me see. And, also, LAX is the most busiest airport in California as mentioned in page 1-26, the second busiest in the country, and having more direct access for residents from Antelope Valley to Orange County to reach LAX by taking a high-speed rail into LAX.

With that, I thank you for your time.

MS. ARELLANO: Thank you very much. Appreciate your comments.

I have another request from Jessica Serrano. Please come forward. I see that you have

1656

another comment. Go right ahead.

MS. SERRANO: Just very quickly, I forgot to mention that we'd like to request the comment period be extended for additional time. The City needs additional time to put its comments together in -- in writing.

And with the holidays that, you know, were part of the comment period, you know, we had a two-week closure and -- and we came back to the New Year with a lot of other priorities. And we have a small team, so we would appreciate an extension on -- on the comment period.

MS. ARELLANO: Thank you very much.

MS. SERRANO: Thank you.

MS. ARELLANO: I believe those are all the requests that I've received for speakers this evening. If anyone else has a request to speak, please complete your card. I do not see any additional.

I want to make clear that the Authority public hearing panel is here this evening until eight o'clock this evening. We are here ready to receive public comments on the project for anyone who may still arrive between now and eight o'clock.

For those of you who are still here in

22.41 Response to Submission 013944 (Jessica Serrano, City of Commerce, Feb 10, 2026)

22.41.1 1648

Section 3.4, Noise and Vibration, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) includes a detailed analysis of noise impacts from the project. As listed in Table 3.4-16 of the Draft EIR/EIS, the 26 residences that are expected to experience severe noise impacts during operation are in Pico Rivera and Anaheim. No residences in Commerce are predicted to experience noise impacts during operation.

22.41.2 1649

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18, Standard Responses.

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-02: Impacts on Businesses, in Chapter 18.

Section 3.12, Socioeconomics and Communities, of the Draft EIR/EIS includes a detailed analysis of the economic impacts from the project in Commerce. The project would displace an estimated 115 businesses (58 commercial and 57 industrial businesses) and 1,101 employees (Impact SO-3). As a point of clarification, some of these displacements would occur in different parts of the city, and are not associated with the BNSF Railway truck parking relocation. The high-speed rail (HSR) Interactive Map (https://meethsrsocal.org/la-a-overview/la-a-interactive-map/) can be used to determine if a parcel would be a full acquisition, partially affected parcel, or temporary construction easement. Additional information on right-of-way acquisitions can be found in Section 3.12; Volume 2, Appendix 3.1-B, Los Angeles to Anaheim: Footprint Mapbook; Appendix 3.12-E, Business Displacement Maps; and the *Los Angeles to Anaheim Project Section Draft Relocation Impact Report*.

As presented in Table 3.12-27 and Table 3.12-28, there would be a surplus of suitable industrial replacement sites, but only 15 available commercial sites in Commerce. For commercial businesses without a suitable replacement, alternative locations have been identified in surrounding areas. If all displaced businesses are able to relocate to available units, the deficit of 43 commercial units in Commerce would result in sales and use tax loss of 1.21 percent (Impact SO-8). If none of the displaced businesses are able to relocate in Commerce, there would be a loss in sales and use tax revenue of 2.52 percent. Any potential for revenue lost would be partially offset by increased sales tax revenue generated during construction. Overall, revenue losses would be relatively small and are not anticipated to result in the physical deterioration of government facilities.

22.41.3 1650

The California High-Speed Rail Authority (Authority) contacted the commenter on January 26, 2026, and provided the requested materials, as well as meeting times for further discussion.

22.41.4 1651

Refer to response to comment #1649 above. The Authority has evaluated multiple sites for the relocated storage and staging tracks and, in selecting the site south of the existing Hobart Yard, has balanced the potential impacts and benefits of the project. This location in Vernon provides benefits for all operators as well as corridor cities, because it reduces the miles that empty trains need to travel throughout the corridor. The Draft EIR/EIS evaluates the relocation of such tracks for potential impacts. For further discussion of disadvantaged communities and evaluation of disproportionately high and adverse effects on minority and low-income communities, refer to Chapter 5, Community Analysis.

22.41.5 1652

Regarding noise impacts in Commerce, refer to response to comment #1648 above. As discussed in Section 3.4 in Impact N&V-5, no sensitive receptors in Commerce would experience operational vibration levels that exceed the impact criteria. Impacts related to air quality are discussed in Section

3.3, Air Quality and Global Climate Change. An operational health risk assessment was conducted to evaluate the impacts of diesel particulate matter exposure from emissions generated by Commerce Yard, which would be modified as part of the project. Table 3.3-37 in Impact AQ-8 lists the risk results from construction at residential and worker receptor land uses within 1,000 feet of the study segments, with the risk levels predicted to be lower than the South Coast Air Quality Management District's significance thresholds. AQ-IAMF#3, Renewable Diesel; AQ-IAMF#4, Reduce Criteria Exhaust Emissions from Construction Equipment; and AQ-IAMF#5, Reduce Criteria Exhaust Emissions from On-Road Construction Equipment, will reduce construction-related diesel particulate matter and associated receptor exposure through application of all best available on-site controls and are included in the modeling. Table 3.3-46 in Impact AQ-15 lists the risk results from operations at Commerce Yard. During operations, health risks would decrease in future years compared to existing conditions, and operation of Shared Passenger Track Alternative A would not result in an incremental increase in cancer risk or chronic noncancer risks.

22.41.6 1653

Refer to response to comment #1650 above.

22.41.7 1654

Refer to Standard Response LAA-Response-Chapter 2 Alt-03: HSR Station Options, in Chapter 18.

22.41.8 1655

Refer to Standard Response LAA-Response-Chapter 2 Alt-03: HSR Station Options, in Chapter 18.

22.41.9 1656

Refer to Standard Response LAA-Response-GENERAL-08: Requests for Extension of the Comment Period, in Chapter 18.

The Authority contacted the commenter on January 28, 2026, and informed them that the Authority would not be able to extend the comment period.

Los Angeles to Anaheim - RECORD #013953 DETAIL

Status:	Action Pending
Record Date:	02/11/2026
Interest As:	Local Agency
Full Name:	Robert Sanchez

Stakeholder Comments/Issues:

Good Evening High Speed Rail Authority, Attached to this email please find a comment letter, regarding the Draft Environmental Impact Report for the Los Angeles to Anaheim segment, on behalf of the Los Angeles Department of Transportation and the Los Angeles Department of City Planning. Thank you for the opportunity to review the Draft EIR/EIS, we look forward to working with you to move this project forward. Thank you.

CITY OF LOS ANGELES
CALIFORNIA

Laura Rubio-Cornejo
GENERAL MANAGER

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
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KAREN BASS
MAYOR

February 3, 2026

Rachel Kesting
Information Officer
California High-Speed Rail Authority
355 S. Grand Avenue, Suite 2050
Los Angeles, CA 90071

CALIFORNIA HIGH SPEED RAIL DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT (EIR/EIS), LOS ANGELES TO ANAHEIM SECTION – LADOT COMMENTS

Dear Ms. Kesting:

1708 The City of Los Angeles Department of Transportation (LADOT) appreciates the opportunity to review the Draft Environmental Impact Report/Statement (EIR/EIS), dated October 2025, for the proposed California High Speed Rail – Los Angeles to Anaheim Section (Project). Understanding that the footprint within the City of Los Angeles for this section is much smaller than the previous section, and thus we had less engagement prior to the DEIR release, we appreciate the opportunity to comment and we look forward to working with the HSRA to move this important regional transportation project forward.

According to the project description, the Los Angeles to Anaheim Project Section, approximately 30 miles long through the Cities of Los Angeles, Vernon, Commerce, Bell, Montebello, Pico Rivera, Santa Fe Springs, Norwalk, La Mirada, Buena Park, Fullerton, and Anaheim, would be implemented largely within the existing railroad right-of-way and would share the Los Angeles- San Diego- San Luis Obispo Rail Corridor (LOSSAN Corridor). This corridor is used by other existing rail operators such as National Railroad Passenger Corporation (Amtrak), the Southern California Regional Rail Authority (SCRRA), the Union Pacific Railroad (UPRR) and BNSF Railway (BNSF). The Preliminary Impacts Assessment Report recommended the Shared Passenger Track Alternative be split into two build alternatives, Shared Passenger Track Alternative A and Shared Passenger Track Alternative B, which are similar in all aspects, except for the Light Maintenance Facility (LMF) size and location. Alternative B considers an LMF location within the City of Los Angeles, with primary vehicle access located at Washington Boulevard and 15th Street. In May of 2024, the Board identified Shared Passenger Track Alternative A as the Preferred Alternative. We support Alternative A as the preferred alternative as it would eliminate the need to acquire multiple properties which would displace 18 existing employment uses within the City of Los Angeles.

1709 As noted in Section 4.1, Definition of Resource Study Area (RSA), the RSA includes 358 study intersections and 248 study roadway segments with 88 of the study intersections being located in the City of Los Angeles, 86 in the Los Angeles Union Station (LAUS) area and 2 in the "outside of

1709

station" areas. Given the scale of this analysis, it is expected that some details would be overlooked. As you will see in the comments provided below, it is LADOT's opinion that there are gaps in the analysis that need to be addressed. Until we have these additional analysis results, we respectfully request another opportunity to review and comment on the full transportation analysis of this Project, when it is completed, prior to preparing the final environmental report.

In addition to the comments offered below, LADOT provides detailed technical comments in Attachment A and comments submitted by the Los Angeles Department of City Planning in Attachment B.

GENERAL COMMENTS

1710

LADOT Operational Analysis - In December 2018, the State adopted updates to CEQA guidelines that included a change to the transportation impact metric from delay/Level of Service (LOS) to Vehicle Miles Traveled (VMT). On July 30, 2019, the Los Angeles City Council followed suit and adopted new transportation assessment guidelines and VMT-based impact thresholds. During preparation of the new CEQA guidelines, the State's Office of Planning and Research stressed that agencies can continue to apply traditional operational analysis requirements to inform transportation project decisions provided that such analyses were outside of the CEQA process. Therefore, in addition to VMT analysis, projects within the city of Los Angeles are required to include access and circulation analyses outside of the CEQA process to address any operational concerns and deficiencies.

The Project DEIR/DEIS does include traditional LOS operational analysis. Any deficiency identified in the Project's operational analysis are deficiencies that the City expects the Project to address, as feasible, and should be reflected as such through the report. It should also be noted that said improvements are subject to the review and approval of LADOT. We understand that HSR station modifications to Los Angeles Union Station (LAUS) were approved as part of the Burbank to Los Angeles Project Section following the certification of the Burbank to Los Angeles Project Section Final Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS), and the Los Angeles to Anaheim Project Section as it currently is proposed would not modify the prior approval of HSR station modifications to LAUS. Additionally, the construction activities related to the potential Light Maintenance Facility in Shared Passenger Track Alternative B need to be in line with current LADOT Transportation Assessment Guidelines (TAG). Therefore, in order to appropriately address any discrepancy, the Project should complete an additional discussion with LADOT to identify the appropriate methodology for correcting the analysis prior to completing the project final EIR.

SPECIFIC COMMENTS

Refer to Attachment A for specific questions and comments regarding both the Transportation Section (3.2) of the EIR and the Transportation Technical Report.

Refer to Attachment B for specific comments from the Department of City Planning.

CONCLUSION

1711

LADOT supports the Project and sees it as an important regional enhancement that can help reduce the State's overall greenhouse gas emissions and VMT, reduce airport congestion, and modernize rail travel. Nonetheless, we recommend that additional analysis be conducted to address potential local operational deficiencies that may arise as a result of the project, and to fully consider how the Project may impact the Los Angeles River, its watershed, and existing, ongoing, and planned projects to revitalize the River and its corridor. Therefore, in order to ensure the best possible strategy for fully addressing the potential impacts of this project, the HSRA should engage LADOT and City staff to discuss the various comments provided in this review prior to moving forward with the development of the final environmental impact report.

If you have any questions, please contact LADOT Central Development Review at ladot.devreview.cen@lacity.org

Sincerely,

Robert Sanchez (Feb 3, 2026 16:10:08 PST)

Robert Sanchez
Senior Transportation Engineer

Attachments

c: Tina Backstrom, Mayor's Office
William Lamborn, Mayor's Office
Helen Campbell, Council District 1
Kevin Ocubillo, Council District 14
Bert Moklebust, Bureau of Engineering
Emily Gable, Department of City Planning

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ATTACHMENT A - COMMENTS FROM DEPARTMENT OF TRANSPORTATION

The Los Angeles Department of Transportation has reviewed the California High-Speed Rail Authority's Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the California High-Speed Rail (HSR) section from Los Angeles to Anaheim Project Section.

The matrix that follows details the Department's comments across the document:

	#	Document Section	Page Number	Department of Transportation Comment
1712	1	All Sections	General	Any reference to the City of Los Angeles' Mobility Plan 2035 should not have a parenthetical or date reference that suggests it was adopted in 2024. Mobility Plan 2035 was adopted by the City Council on September 7, 2016.
1713	2	General	General	The Authority should continue coordinating with LA Metro to ensure the design of their LA River Bike Path Project does not conflict with the design of High-Speed Rail. The River Bike Path project is contemplating design options that would have access points on either side of the river at multiple locations, which may overlap with the electrical components of the HSR alignment.
1714	3	Section 3.13 Station Planning, Land Use, and Development	3.13-57	The document states, "In the city of Los Angeles, 1.56 acres of land would need to be permanently acquired. The land is primarily in two locations: 1. At the radio site east of the Los Angeles River near the intersection of Mission Road and Jesse Street. Adjacent lands are designated for industrial, commercial, services and office uses." Contrary to the map shown in Figure 3.13-1, the configuration of the roadways has changed surrounding the location of the radio site. A roundabout exists at the intersection of Mission Rd, Jesse St, and Myers St. Surrounding land uses may have changed as well. For example, on the northeast corner of the intersection at 2233 E Jesse St, a discretionary project was recently approved for a change of use from a warehouse to a motion picture studio and soundstage with ancillary office uses.
1715	4	Appendix 3.12-D: Bikeway Maps	3.12-D-2	Figure 3.12-D-1 shows bikeways within the Resource Study Area. However, it appears the bikeways shown within the City of LA may be inaccurate. For example, there is no existing Class I Bike Path that spans the length of the LA River as shown on the map. The City's map of existing bikeways are maintained by LADOT and can be found on the City's Geohub, and can be symbolized by type of facility (e.g., Class I, II, III, IV): https://geohub.lacity.org/datasets/8cecdd0293264602bef3432e8d7a4afe_0/explore?location=34.052682%2C-118.209171%2C14&style=Class

1716	4	Section 3.2 Transportation	3.2-14	Table 3.2-2 states, "Although an LOS of D is the desired minimum, significance is determined on a case-by-case basis." The Mobility Plan does not contain nor endorse this language regarding a desired minimum. In 2019, City Planning adopted the standards of Appendix G of the CEQA Guidelines as the thresholds of significance for impacts pursuant to CEQA. For transportation, the level of significance is determined by Vehicle Miles Traveled, as documented in LADOT's Transportation Assessment Guidelines (TAG).
1717	5	Section 3.2 Transportation	3.2-32	TR-IAMF#2- A Construction Traffic Management Plan (CTMP) should be submitted for LADOT review and approval prior to construction affecting City facilities. The CTMP should include lane closures, detours, construction staging, haul routes, and maintenance of emergency access.
1718	6	Section 3.2 Transportation	3.2-32	TR-IAMF#12- Any impacts to pedestrian or bicycle access should be addressed according to the Ca MUTCD, Section 6A.02 and the LADOT TAG as required.
1719	7	Section 3.2 Transportation	3.2-79	Shared Passenger Track Alternative B would require undercrossing at Olympic Boulevard. Coordination on these designs would be required to ensure that there would not be any conlflicts with the LA River MasterPlan as well as general vehicular circulation and access, both during and after construction.
1720	8	Section 3.2.1 Introduction	3.2-12	The Draft EIR/EIS identifies the Los Angeles–Anaheim Project Section as approximately 30 miles in length, including 23.8 miles at-grade, 5.0 miles elevated, and 0.9 miles below-grade. Clarify how at-grade, elevated, and below-grade segments interface with City streets, sidewalks, and bicycle facilities.
1721	9	Section 3.2.1 Introduction	3.2-13	Identify locations where vertical infrastructure such as columns, retaining walls, or guideways may constrain the public right-of-way.
1722	10	Section 3.2.1 Introduction	3.2-14	Confirm that final right-of-way requirements will not preclude future City mobility improvements, including pedestrian, bicycle, and transit enhancements.
1723	11	Section 3.2.4 Methods for Impact Analysis	3.2-79	The Draft EIR/EIS identifies 18 impacted intersections within the LAUS area under the Horizon Year 2040 Plus Project scenario, including 12 signalized and 6

1723				unsignalized intersections. Many identified intersections are under LADOT jurisdiction and will require City review prior to implementation of mitigation.
1724	12	Section 3.2.6 Environmental Consequences	3.2-186	Proposed mitigation measures such as signal timing changes, restriping, added turn lanes, or new traffic signals must undergo separate LADOT approval and permitting.
1725	13	Section 3.2.6 Environmental Consequences	3.2-188	Early coordination is requested for operational modeling at key intersections, including Alameda Street and Cesar E. Chavez Avenue; Vignes Street and Cesar E. Chavez Avenue; and Figueroa Street and Temple Street.
1726	14	Section 3.2.6 Environmental Consequences	3.2-190	Intersection mitigations should not degrade pedestrian safety, transit operations, or emergency access.
1727	15	Section 3.2.5 Affected Environment	3.2-132	The Draft EIR/EIS relies on future station area planning measures to address First and Last Mile access. First and Last Mile improvements within the City of Los Angeles should be clearly defined, funded, and implemented as part of the project and should not be deferred solely to future technical memoranda.
1728	16	Section 3.2.5 Affected Environment	3.2-134	Station access planning should support the Downtown Community Plan goal of achieving a 75 percent non-automobile mode share.
1729	17	Section 3.2.5 Affected Environment	3.2-136	Pedestrian, bicycle, and transit access improvements around LAUS should be treated as core project components rather than optional enhancements .
1730	18	Section 3.2.5 Affected Environment	3.2-145	Several impacted intersections near LAUS are located on the City's High Injury Network. Increased pedestrian activity associated with High-Speed Rail operations warrants enhanced safety measures beyond standard signal timing adjustments.
1731	19	Section 3.2.6 Environmental Consequences	3.2-198	Safety treatments should include, where feasible, leading pedestrian intervals, high-visibility and upgraded crosswalks, curb extensions, and protected or controlled turning movements.

1732	20	Section 3.2.6 Environmental Consequences	3.2-200	Safety improvements should align with the City's Vision Zero objectives.
1733	21	Section 3.2.5 Affected Environment	3.2-150	The Draft EIR/EIS primarily emphasizes vehicular Level of Service at impacted intersections. Supplemental analysis should address pedestrian comfort and safety, particularly along routes connecting LAUS to the Arts District and adjacent neighborhoods.
1734	22	Section 3.2.5 Affected Environment	3.2-152	Evaluation should consider sidewalk width, crossing distances, lighting, and exposure to industrial traffic.
1735	23	Section 3.2.6 Environmental Consequences	3.2-204	Where roadway modifications or grade separations are proposed, designs should accommodate future protected bicycle facilities consistent with the City's Bicycle Enhanced Network and avoid the need for future retrofits.
1736	24	Section 3.2.6 Environmental Consequences	3.2-236	The project includes long-term construction activities that may affect City streets, transit operations, and curbside uses. A Construction Transportation Plan must be submitted for LADOT review and approval prior to construction affecting City facilities.
1737	25	Section 3.2.6 Environmental Consequences	3.2-238	The Construction Transportation Plan should address lane closures and detours, construction staging and haul routes, and maintenance of emergency access.
1738	26	Section 3.2.6 Environmental Consequences	3.2-240	Temporary closures or relocations of sidewalks, bicycle lanes, bus stops, or parking must include ADA-compliant detours and safe pedestrian and bicycle routing.
1739	27	Section 3.2.6 Environmental Consequences	3.2-242	Construction haul routes should avoid residential streets and sensitive receptors to the greatest extent feasible.
1740	28	Section 3.2.5 Affected Environment	3.2-160	Explicit coordination is required for LADOT DASH and Commuter Express services operating near LAUS.
1741	29	Section 3.2.6 Environmental Consequences	3.2-210	Station area design should include clearly designated curb space for municipal transit services, and curb management should prevent displacement of public transit by transportation network companies or private shuttle services.

1742	30	Section 3.2.6 Environmental Consequences	3.2-212	Any temporary or permanent removal of on-street parking or parking meters must be coordinated with LADOT, including payment of applicable Meter Revenue Recovery Fees.

ATTACHMENT B - COMMENTS FROM DEPARTMENT OF CITY PLANNING

The Los Angeles Department of City Planning has reviewed the California High-Speed Rail Authority's Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the California High-Speed Rail (HSR) Los Angeles to Anaheim Project Section.

The matrix that follows details the Department of City Planning's comments across the document:

	#	Document Section	Page Number	Department of City Planning Comment
1743	1	All Sections	General	Any reference to the City of Los Angeles' Mobility Plan 2035 should not have a parenthetical or date reference that suggests it was adopted in 2024. Mobility Plan 2035 was adopted by the City Council on September 7, 2016.
1744	2	All Sections	General	For references to the City of Los Angeles' Boyle Heights Community Plan, any footnote or reference that states, "This plan is currently undergoing an update as of January 2025," should be replaced with: "The Boyle Heights Community Plan was adopted by the City Council on September 25, 2024."
1745	3	General	General	The Authority should continue coordinating with LA Metro to ensure the design of the High-Speed Rail Project does not conflict with the LA River Path Project. Both are important projects for the City of Los Angeles. The LA River Path project is contemplating design options that would have access points on either side of the LA River at multiple locations. Collaborative coordination is needed to ensure appropriate separations between these new infrastructure projects, safety, and comfort of River Path users, without either project incurring unnecessary costs.
1746	4	Section 3.2 Transportation	3.2-14	In Table 3.2-2 Regional and Local Plans and Policies, for the row labeled "City of Los Angeles General Plan, Mobility Plan 2035 (2024)," the year of 2024 in parentheses is incorrect. Mobility Plan 2035 was adopted by the City Council on September 7, 2016. Additionally, the table states, "The City of Los Angeles General Plan, last updated in 2024…" The City's General Plan consists of multiple Elements that are updated separately. Because this row in the table is specifically related to the Mobility Plan, which was updated in 2016, deleting "last updated in 2024" would improve accuracy. Additionally, the table states, "Although an LOS of D is the desired minimum, significance is determined on a case-by-case basis." The Mobility Plan does not contain nor endorse this language regarding a desired minimum. In 2019, City Planning adopted the standards of Appendix G of the CEQA Guidelines as the thresholds of significance for impacts pursuant to CEQA. For

	#	Document Section	Page Number	Department of City Planning Comment
1746				transportation, the level of significance is determined by Vehicle Miles Traveled, as documented in LADOT's Transportation Assessment Guidelines.
1747	5	Section 3.2 Transportation	3.2-15	In Table 3.2-2 Regional and Local Plans and Policies, for the row labeled "Boyle Heights Community Plan: Circulation Element (2024)," the term "Circulation Element" should not be used alongside the Boyle Heights Community Plan. The Boyle Heights Community Plan is one of 34 plans that comprise the City's Land Use Element of the General Plan. The plan was adopted by the City Council on September 25, 2024, and, as of January 2026, is anticipated to become operative within the year, alongside a set of zoning ordinances that are still under review by the Office of the City Attorney. Within the Boyle Heights Community Plan, there is a Mobility & Connectivity chapter that speaks to circulation and transportation. Relevant goals and policies include: MC Goal 1: An integrated street and transit network that provides safe and efficient mobility options for all users. MC Policy 1.3: Ensure that major destinations, including public facilities and open spaces, within the community are sufficiently equipped with bus shelters, safe pedestrian crossings, bicycle parking, and wayfinding signage. MC Policy 1.4: Enhance connectivity around major transit stations and intersections by pursuing opportunities to provide efficient and intuitive pathways through large blocks that follow desired pedestrian routes. MC Goal 2: A street network that offers a safe and pleasant environment for all users of sidewalks and the public right of way. MC Policy 2.4: Improve the pedestrian experience under freeway overpasses and bridges by incorporating pedestrian lighting, landscaping, and public art.
1748	6	Section 3.12 Socioeconomics and Communities	3.12-1	In the Table 3.12-1 Regional and Local Plans and Policies, for the row labeled "City of Los Angeles General Plan (2024), Framework Element (2023),

	#	Document Section	Page Number	Department of City Planning Comment
1748				Mobility Element (2016)," the parentheses for "(2024)" can be deleted. The City's General Plan consists of multiple Elements that are updated separately.
1749	7	Section 3.12 Socioeconomics and Communities	3.12-10	In the Table 3.12-1 Regional and Local Plans and Policies, for the row labeled "Boyle Heights Community Plan," relevant policies to include are: LU 13.4 Ensure that continued investment in infrastructure and amenities along the Los Angeles River results in sustainable economic development with equitable outcomes for current residents of Boyle Heights. Additionally, as alluded to in Comment #2, Footnote 1, which is enumerated on page 3.12-21, should instead state, "The Boyle Heights Community Plan was adopted on September 25, 2024 by the Los Angeles City Council."
1750	8	Section 3.13 Station Planning, Land Use, and Development	3.13-8	In the Table 3.13-1 Regional and Local Plans and Policies, for the row labeled "Boyle Heights Community Plan," relevant policies to include are: LU 13.4 Ensure that continued investment in infrastructure and amenities along the Los Angeles River results in sustainable economic development with equitable outcomes for current residents of Boyle Heights. LU 6.1 Promote developments around transit stations that add value to the community by providing a mix of multi-unit housing, neighborhood-serving commercial uses, and community amenities. LU 6.3 Maximize the benefits of transit by concentrating higher residential and employment densities within several blocks of each of the community's major transit stations. MC 1.4 Enhance connectivity around major transit stations and intersections by pursuing opportunities to provide efficient and intuitive pathways through large blocks that follow desired pedestrian routes. PO 3.4 Provide convenient and visually interesting paths

	#	Document Section	Page Number	Department of City Planning Comment
1750				of travel for pedestrians from nearby neighborhoods and transit stations to destinations along the River. Additionally, as alluded to in Comment #2, Footnote 1, which is enumerated on page 3.13-21, should instead state, "The Boyle Heights Community Plan was adopted on September 25, 2024 by the Los Angeles City Council."
1751	9	Section 3.13 Station Planning, Land Use, and Development	3.13-41	The sentence should be updated from, "The Los Angeles River, abutting the direct RSA on the east, is designated for open space and recreation in the City of Los Angeles General Plan and the Central City North Community Plan," to: "The Los Angeles River, abutting the direct RSA on the east, has a General Plan Land Use designation of Open Space within the City of Los Angeles." The Downtown Community Plan was adopted on May 3, 2023 and it replaced the Central City North Community Plan.
1752	10	Section 3.13 Station Planning, Land Use, and Development	3.13-56	The Department supports the Authority's proposed location of a light maintenance facility (LMF) under Alternative A. According to the DEIR, Alternative A would allow for more efficient maneuvering of trains in and out of the yard because all tracks would have access from the mainline on both the east and west sides (p. S-16). Furthermore, additional land acquisition would not be necessary under Alternative A because the LMF location is already within the existing project footprint (p. S-17). In contrast, the LMF site under Alternative B would entail multiple property acquisitions that would displace the 18 existing employment uses within the City of Los Angeles. According to the DEIR: *OCIO-IAMF#3 will provide relocated business owners with individualized relocation assistance with the objective of minimizing the permanent closure of businesses and the economic disruptions to displaced businesses. Suitable relocation sites have been identified to accommodate the relocation of commercial and industrial businesses in Los Angeles. These impacts would not result in the closure of key businesses that would reduce the viability of a commercial district.*

	#	Document Section	Page Number	Department of City Planning Comment
1752				Despite the Impact Avoidance and Minimization Features described above, the City of LA's land use vision for the LMF sites in Alternative B is to preserve and promote industrial and employment uses. The parcels in Alternative B have a General Plan Land Use designation of Production, which, in the Downtown Community Plan is described as such: *Production areas preserve and sustain industrial activity while serving as a regional jobs base. Uses include heavy industrial and evolving and innovative industries, such as light assembly and manufacturing, clean technology, incubators, and research and development facilities.* The following goals and policies in the Downtown Community Plan highlight the importance of preserving industrial jobs: LU Goal 47: Distribution of land uses enhances investment opportunities in industrial areas, and supports the employment and entrepreneurial needs of the city and the region. LU Policy 47.1: Facilitate the location of traditional industrial activity, in addition to clean technology, incubator businesses, and emerging industries in Production areas. LU Goal 48: Vibrant centers of employment for a diversity of skills and industrial sector activities, including production, distribution, wholesale, and manufacturing. These areas accommodate shifting and new industry, maintaining efficient use of high-quality and flexible structures. LU Policy 48.1: Prioritize space for jobs by preserving existing industrial functions, allowing production sectors to cluster, and facilitating goods movement with access to freeways and transportation corridors. LU Policy 48.7: Support and reinforce the ecosystem of industry clusters while integrating new employment uses and economic activities.

	#	Document Section	Page Number	Department of City Planning Comment
1752				LU Policy 49.3: Balance flexible, large lot configurations that sustain industrial activity, while still improving the way in which structures meet the street and contribute to a safe street environment that can accommodate users other than trucks.
1753	11	Section 3.13 Station Planning, Land Use, and Development	3.13-57	The document states, "In the city of Los Angeles, 1.56 acres of land would need to be permanently acquired. The land is primarily in two locations: 1. At the radio site east of the Los Angeles River near the intersection of Mission Road and Jesse Street. Adjacent lands are designated for industrial, commercial, services and office uses." Please note that the configuration of the roadways has changed surrounding the location of the radio site, and no longer matches the configuration shown in Figure 3.13-1. A roundabout exists at the intersection of Mission Rd, Jesse St, and Myers St. Surrounding land uses may have changed as well. For example, on the northeast corner of the intersection at 2233 E Jesse St, a discretionary project was recently approved for a change of use from a warehouse to a motion picture studio and soundstage with ancillary office uses. Project information can be found by searching for Case # DIR-2021-4708-SPR at https://planning.lacity.gov/pdiscaseinfo/.
1754	12	Section 3.17 Cultural Resources	3.17-12	In Table 3.17-2, the City of Los Angeles Adaptive Reuse Ordinance amendment, Ordinance 188793, was adopted in December 2025 and has an operative date of February 1, 2026. Comments elsewhere in this letter regarding the dates and titles of other City of Los Angeles plans, policies, and ordinances should be applied in this table, and throughout the document, as well.
1755	13	Section 3.17 Cultural Resources	3.17-82 3.17-132	On September 17, 2020 at a meeting of the City of Los Angeles Cultural Heritage Commission, the HSR project team presented the concept design for the proposed safety enhancements to the historic bridges being impacted by the project. The Cultural Heritage Commission expressed concerns about the design direction not being in conformance with the Secretary of the Interior's Standards for Rehabilitation. The team agreed to refine the designs and bring them back to the

	#	Document Section	Page Number	Department of City Planning Comment
1755				Commission for further review and approval as the project moves forward. Please coordinate with the City's Office of Historic Resources.
1756	14	Appendix 3.1-A: Regional and Local Policy Inventory and Consistency Analysis	3.1-A-320	See Comments #1 and #2 above.
1757	15	Appendix 3.12-D: Bikeway Maps	3.12-D-2	Figure 3.12-D-1 shows bikeways within the Resource Study Area. However, it appears the bikeways shown within the City of LA may be inaccurate. For example, at this time there is not an existing Class I Bike Path that spans the length of the LA River as shown on the map. The City's map of existing bikeways are maintained by LADOT and can be found on the City's Geohub, and can be symbolized by type of facility (e.g., Class I, II, III, IV): https://geohub.lacity.org/datasets/8cecdd0293264602bef3432e8d7a4afe_0/explore?location=34.052682%2C-118.209171%2C14&style=Class

22.42 Response to Submission 013953 (Robert Sanchez, City of Los Angeles, Feb 11, 2026)

22.42.1 1708

The commenter provides a general summary of the Shared Passenger Track Alternatives and expresses support for Shared Passenger Track Alternative A. No revisions have been made to the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) in response to this comment.

22.42.2 1709

Refer to Standard Response LAA-Response-Chapter 9 OUTREACH-01: Public Involvement Process, in Chapter 18, Standard Responses.

The commenter refers to 88 study intersections in the city of Los Angeles. As noted in Sections 5.8 and 6.4.1.2 of the *Los Angeles to Anaheim Project Section Transportation Technical Report*, these intersections were analyzed as part of the Burbank to Los Angeles Project Section and were included for reference only in the Los Angeles to Anaheim Project section (project section) environmental documents. The commenter asserts that there may be gaps in the analysis, but does not identify any specific environmental issue. The commenter requests another opportunity to review and comment on the full transportation analysis of the project prior to publication of the Final EIR/EIS. The California High-Speed Rail Authority (Authority) will not be accepting additional comments received after the close of the Draft EIR/EIS public comment period on February 3, 2026. The transportation analysis was completed in preparation of the Draft EIR/EIS, with the full details included in the *Los Angeles to Anaheim Project Section Transportation Technical Report*.

The comment does not identify a transportation impact under the California Environmental Quality Act (CEQA). Vehicle delay and level of service (LOS) are not considered significant environmental impacts (refer to Public Resources Code Section 21099 and State CEQA Guidelines Section 15064.3(b)(1)). Vehicle miles traveled (VMT) is the measure of transportation impacts under CEQA (refer to State CEQA Guidelines Section 15064.3). This comment does not identify an issue associated with a VMT impact and, therefore, no further response is required for purposes of CEQA.

22.42.3 1710

The commenter raises a question about the requirements for detailed traffic operations assessments and consistency with Los Angeles Department of Transportation (LADOT) requirements. The commenter is correct in that changes to the State CEQA Guidelines were adopted in December 2018 and implemented as of July 1, 2020, and required the evaluation of significant transportation impacts on VMT instead of LOS operating conditions. Nevertheless, a full operational analysis was conducted for the project, including the determination of intersection, roadway, ramp, and freeway mainline conditions for 2040 conditions. In addition, a separate operational assessment was conducted for construction conditions. A summary of these analyses can be found in Section 3.2, Transportation, of the Draft EIR/EIS and full results are included in the *Los Angeles to Anaheim Project Section Transportation Technical Report*. Mitigation measures are proposed for all adverse traffic effects, none of which would be in Los Angeles. In addition, a supplemental VMT analysis was conducted, consistent with the new state and local requirements, which can be found in Appendix 3.2-A, Vehicle Miles Traveled Memorandum, of the Draft EIR/EIS.

Regarding the request for compliance with LADOT Transportation Assessment Guidelines, the Authority is a state agency and therefore is not required to comply with local ordinances and analysis requirements, such as the LADOT Transportation Assessment Guidelines methodology. Each of the high-speed rail (HSR) project sections cross multiple jurisdictions, each of which may have their own individual traffic study methodologies and requirements. As such, an HSR-specific methodology was developed that followed generally accepted industry practices, which were then applied for entire project sections.

22.42.4 1711

The Authority acknowledges LADOT's support for the project.

Local operational deficiencies as a result of the project are discussed in Section 3.2. There would not be adverse effects on intersections and roadways in Los Angeles.

In Section 3.8, Hydrology and Water Resources, the direct resource study area includes the Los Angeles River subwatershed and the Los Angeles River. Section 3.8.5, Affected Environment, provides an overview of existing water crossing features for the Los Angeles River and the watershed. Section 3.8.6, Environmental Consequences, discusses the potential impacts on hydrology and water quality, including the Los Angeles River subwatershed and the Los Angeles River, from construction and operation of the project alternatives and HSR station options. This section also notes that the Los Angeles River would be crossed on an existing bridge, but the river would not be modified. Planned projects to revitalize the river and its corridor, including the LA River Master Plan, are summarized in Table 3.8-1.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.42.5 1712

Where Mobility Plan 2035 is included in the EIR/EIS with the City of Los Angeles General Plan, the date portrayed is 2024 because this was the most recent amendment of any portion of the general plan. Where Mobility Plan 2035 is portrayed as distinct from the City of Los Angeles General Plan, the year either already indicates, or has been revised to, 2016 in the Final EIR/EIS, often with accompanying text clarifying the relevant dates. These revisions were made in Section 3.2; Section 3.11, Safety and Security; and Appendix 3.1-A, Regional and Local Policy Inventory and Consistency Analysis; and are presented in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS in Section 16.5.2, Section 3.2: Transportation, Section 16.5.11, Section 3.11: Safety and Security, and Section 16.24, Appendix 3.1-A: Regional and Local Policy Inventory and Consistency Analysis.

22.42.6 1713

The comment requests that the Authority coordinate with the Los Angeles Country Metropolitan Transportation Authority (Metro) to ensure that the project section and the LA River Path Project do not conflict. As a proposed recreational resource, the LA River Path Project is discussed in Section 3.15, Parks, Recreation, and Open Space, of the Draft EIR/EIS. The recreational resource is also included in the cumulative project list presented in Section 3.19, Cumulative Impacts. As discussed in Section 3.15.6.3, Project Impacts, construction and implementation of the project section would not preclude the Los Angeles River Trail Extension (Planned), and project impacts would be less than significant.

The Authority will coordinate in advance with Metro regarding any temporary or permanent impacts on agency facilities associated with the Preferred Alternative.

This comment does not address the sufficiency of the Draft EIR/EIS, nor does it suggest edits to the document; accordingly, no change has been made to the document in response to this comment.

22.42.7 1714

The commenter identified an inconsistency on Draft EIR/EIS Figure 3.13-1 where the roadway configuration around the radio site has changed and was therefore depicted incorrectly.

Figures presented in Draft EIR/EIS Section 3.13, Station Planning, Land Use, and Development, and Appendix 3.13-A, Existing Land Uses and Zoning of Project Temporary Uses and Permanent Acquisitions Figures, have been revised accordingly. Please refer to Section 16.5.13, Section 3.13: Station Planning, Land Use, and Development; and Section 16.43, Appendix 3.13-A: Existing Land Uses and Zoning of Project Temporary Uses and Permanent Acquisitions Figures, in Chapter 16 for these updated figures.

As described in the Draft EIR/EIS, the land surrounding the radio site is designated for industrial uses. Based on the Los Angeles Municipal Code Section 12.24, motion picture production studios are permitted within industrial zoning or within agricultural, residential, or commercial zones with a conditional use permit. Because the zoning has not changed and the Draft EIR/EIS discusses impacts at the property for commercial uses, the change in use at the property at 2233 E Jesse Street would not result in a change to the analysis or any impact conclusions. Accordingly, no further revisions are necessary.

22.42.8 1715

The commenter identified a potential error in the bikeway mapping presented on Figure 3.12-D-1 and provided a link to LADOT maps for reference purposes. The Authority has revisited the map book in Appendix 3.12-D, Bikeway Maps, and Table 3.12-11 in Section 3.12, Socioeconomics and Communities, of the Draft EIR/EIS to verify accuracy of the data presented and has made necessary revisions to bikeways and community facilities in both sections. Data used for Figure 3.12-D-1 and Table 3.12-11 were pulled from Metro, LADOT, and Orange County Transportation Authority sources. Please refer to Section 16.5.12, Section 3.12: Socioeconomics and Communities, and Section 16.40, Appendix 3.12-D: Bikeway Maps, in Chapter 16 of the Final EIR/EIS for these revisions.

22.42.9 1716

Refer to response to comment #1710 above.

The project must conform to the policies and objectives of the statutes and regulations under which the Authority operates, including all applicable state and federal regulations. As a state agency, the Authority exercised its discretion as lead agency to develop a set of guidelines, methodologies, and thresholds that it uses consistently throughout the state. The Authority will coordinate with local agencies to design in a manner that is as sensitive as possible to the local environment through which it must travel while still meeting the unique design constraints of HSR service.

Consistent with CEQA and National Environmental Policy Act (NEPA) requirements, the project's consistency with local general plans and zoning regulations is discussed in Appendix 3.1-A. Where the project is inconsistent with a local plan, Appendix 3.1-A also contains a discussion of the extent to which the Authority would reconcile the project with the plan as required by 40 Code of Federal Regulations Part 1506.2(d). Although the HSR project would degrade LOS at some intersections and segments, the project includes features and mitigation measures to minimize and avoid LOS impacts. No revisions have been made to the Draft EIR/EIS in response to this comment.

Regarding the sources for the impact thresholds, vehicle miles traveled metrics were used for the CEQA analysis, per State CEQA Guidelines Section 15064.3. For NEPA analysis, the Authority has established thresholds used to determine adverse effects from the project in its programmatic Environmental Methodology Guidelines.

22.42.10 1717

TR-IAMF#2, Construction Transportation Plan, requires the Authority's construction contractor to prepare a construction transportation plan for construction, with a performance standard of minimizing the impact of construction and construction traffic on adjoining and nearby roadways to the extent practicable, in close consultation with the local jurisdiction having authority over the site. The construction transportation plan would address lane closures, detours, construction staging, haul routes, and maintenance of emergency access.

The traffic control plans must be coordinated with the local jurisdiction with authority, which would include LADOT, providing a mechanism both for design review of the traffic control plans and monitoring.

22.42.11 1718

TR-IAMF#12, Pedestrian and Bicycle Safety, describes the Authority's commitment to ensuring bicycle and pedestrian accessibility and safety during construction, including how it will be provided and supported across the HSR corridor.

22.42.12 1719

Consistency with planned projects, including the LA River Master Plan, is summarized in Table 3.15-1. The LA River Master Plan includes plans for two proposed sites near the intersection of Santa Fe Avenue and Fourth Street and E Washington Boulevard. Shared Passenger Track Alternative B would be built within the existing rail right-of-way and has been planned and designed in coordination with local governments to ensure that the project alignment would not conflict with the LA River Master Plan.

The Authority acknowledges LADOT's request and will continue to work with LADOT to avoid or minimize conflicts where practicable as the designs for both projects advance.

Refer to response to comment #1713 above.

22.42.13 1720

The project alignment would remain within the existing corridor and would not conflict with any existing or planned City of Los Angeles mobility improvements. Between Seventh Street and Interstate (I-) 10, the railroad corridor would be expanded to accommodate two HSR layover tracks, which would require minor acquisitions of city-owned property along the corridor. However, this would not result in any impact on city of Los Angeles streets, sidewalks, or bicycle facilities.

As described in Chapter 2, Alternatives, of the Draft EIR/EIS, the alignment is at grade in Los Angeles under an existing roadway bridge at First Street. The alignment would remain at grade to cross under the existing roadway bridges at Fourth Street, Sixth Street, Seventh Street, I-10, and Olympic Boulevard. The tracks would rise onto an existing elevated structure that crosses Washington Boulevard and the Los Angeles River before returning to at grade at Soto Street. As presented in Table 2-14, no modifications would occur at those roadways.

Refer to Volume 3.1, General, Track Alignment, and Right-of-Way Part 2, for more detailed information on how the project alignment interfaces with city of Los Angeles roadways.

22.42.14 1721

Refer to response to comment #1720 above.

22.42.15 1722

Refer to response to comment #1720 above.

Table 3.15-5 describes how the alignment would interact with recreational facilities, including existing and planned bicycle facilities. The Los Angeles River Trail Extension is a planned 10-mile Class 1 bikeway that would extend along the Los Angeles River from where State Route 2/I-5 in central Los Angeles interchange south to the existing segment near Atlantic Boulevard. Although the proposed Los Angeles River Trail Extension would be as close as approximately 110 feet to the project footprint, no conflicts are anticipated. No other planned recreational facilities are identified in Los Angeles.

22.42.16 1723

The commenter states there are affected intersections in the Los Angeles Union Station (LAUS) area, but it is unclear what they are referring to. Impacts associated with the HSR station at LAUS are analyzed as part of the Burbank to Los Angeles Project Section. Refer to the Burbank to Los Angeles Project Section Final EIR/EIS.

As described in Section 3.2 of the Draft EIR/EIS, Impact TR-2, Impact TR-3, Impact TR-10, and Impact TR-11 do not identify any affected intersections in Los Angeles, as depicted on Figure 3.2-6 for Horizon Year 2040, sheets 1 through 3. As such, there are no traffic mitigation measures proposed in Los Angeles.

22.42.17 1724

Refer to response to comment #1723 above.

22.42.18 1725

Refer to response to comment #1723 above.

22.42.19 1726

Refer to response to comment #1723 above.

22.42.20 1727

The Authority acknowledges the City of Los Angeles's support for first-/last-mile improvements. As discussed under Impact TR-13 in Section 3.2 of the Draft EIR/EIS, the Authority will incorporate TR-IAMF#12, which requires the project section design plans to include specifications for vehicle lanes, passenger loading zones, sidewalks, crosswalks, bike lanes, trails, bus stops, parking, and intersection controls. These will address how pedestrian and bicycle accessibility will be provided and maintained. All reconstructed roadways would replace all bicycle and pedestrian facilities on completion of construction. All new and replaced facilities would be designed with specifications for passenger loading zones, sidewalks, crosswalks, bike lanes, trails, bus stops, parking, and intersection controls. Incorporation of this impact avoidance and minimization feature (IAMF) will accommodate the increased number of pedestrians and bicyclists accessing the HSR station during operation.

22.42.21 1728

As stated in Appendix 3.1-A of the Draft EIR/EIS, the Shared Passenger Track Alternatives would support the City of Los Angeles Downtown Community Plan by providing alternative modes of travel.

22.42.22 1729

Access impacts associated with adding HSR service to LAUS are analyzed as part of the Burbank to Los Angeles Project Section. As discussed in the Burbank to Los Angeles Project Section EIR/EIS, several IAMFs would be incorporated into the HSR Build Alternative to avoid and minimize access impacts related to pedestrians and bicyclists during construction, as well as enhance mobility options in the station area during operations. Refer to the Burbank to Los Angeles Project Section Final EIR/EIS for more information.

22.42.23 1730

Refer to responses to comments #1723 and #1729 above.

22.42.24 1731

Refer to responses to comments #1723 and #1729 above.

22.42.25 1732

The Authority acknowledges the goals set forth by the City of Los Angeles Vision Zero initiative. Section 3.11.2.3, Regional and Local, and Appendix 3.1-A: Regional and Local Policy Inventory and Consistency Analysis of the Draft EIR/EIS has been revised to include a discussion of the project section's consistency with the City of Los Angeles Vision Zero Plan. Refer to Section 16.5.11 and Section 16.24 in Chapter 16 for these revisions.

Refer to response to comment #1729 above.

22.42.26 1733

Although impacts on pedestrian comfort and safety are not evaluated under NEPA and CEQA, the Authority would ensure that HSR stations are designed according to the Authority's station area development principles and guidelines. As described in Section 3.13, per LU-IAMF#2, Station Area Planning and Local Agency Coordination, the Authority-designated contractor would be required to develop transit connectivity plans for HSR station area, which would include identification of street enhancements for pedestrian and bicycle access.

22.42.27 1734

Refer to response to comment #1733 above.

22.42.28 1735

Refer to response to comment #1720 above.

22.42.29 1736

Refer to response to comment #1717 above.

22.42.30 1737

Refer to response to comment #1717 above.

22.42.31 1738

As part of the construction transportation plan, and through incorporation of TR-IAMF#4, Maintenance of Pedestrian Access; TR-IAMF#5, Maintenance of Bicycle Access; and TR-IAMF#11, Maintenance of Transit Access, maintenance of pedestrian, bicycle, and transit access would be maintained during construction in accordance with Americans with Disabilities Act requirements.

22.42.32 1739

Under TR-IAMF#2, the Authority will direct all construction activities that would attract diesel truck trips avoid using local residential streets by clearly marked routes with wayfinding signs.

22.42.33 1740

The Draft EIR/EIS provides that the Authority will incorporate TR-IAMF#13, Stakeholder Coordination with Transportation Agencies. TR-IAMF#13 requires the Authority to work closely with all agencies that provide freight and passenger rail services or bus services, or maintain operating rights within the corridor, to ensure that the design, construction, and operation of the project section do not adversely affect existing and planned rail service. The Authority will coordinate with LADOT as part of incorporation of TR-IAMF#13.

22.42.34 1741

The project section would not modify LAUS. As described in Section 2.6.2.1, Relationship to Surrounding High-Speed Rail Projects, of the Draft EIR/EIS, the project section would electrify the elevated structure built as part of the Link Union Station project, but would not include any other components at the station itself. For the other rail stations along the corridor (the relocated Metrolink stations and HSR facilities at Anaheim Regional Transportation Intermodal Center), the designs integrate existing transit service with the proposed stations by providing bus transit plazas and connections to the existing transit facilities at the sites.

22.42.35 1742

No loss of street parking or parking meters are proposed in Los Angeles. The Authority will coordinate with the City of Los Angeles should any loss of street parking occur or parking meters require removal.

22.42.36 1743

Please refer to response to comment #1712 above.

22.42.37 1744

All references to a potential 2025 update of the Boyle Heights Community Plan have been revised in the Final EIR/EIS to note the plan's 2024 adoption date. Please refer to revisions throughout Chapter 16.

22.42.38 1745

Refer to response to comment #1713 above.

22.42.39 1746

The Mobility Plan 2035 adoption date has been clarified as 2016, distinct from the City of Los Angeles General Plan adoption date, in the Final EIR/EIS. The general plan reference has been clarified rather than deleted, in alignment with other parts of the Draft EIR/EIS.

The comment further maintains that Table 3.2-2 incorrectly suggests that Mobility Plan 2035 endorses LOS-based thresholds, even though Los Angeles has officially transitioned to VMT-based CEQA significance criteria. The aforementioned text has been clarified to reflect Mobility Plan 2035's current use of VMT rather than LOS, in alignment with State CEQA Guidelines Appendix G. Please refer to Section 16.5.2 in Chapter 16 for these revisions.

Please also refer to response to comment #1712 above, which addresses the same issue.

22.42.40 1747

The comment correctly notes that the reference to a "Circulation Element" for the Boyle Heights Community Plan is inaccurate because the plan does not have its own circulation element. References to a Circulation Element in the Boyle Heights Community Plan have been deleted from both Table 3.2-2 and Appendix 3.1-A. The suggested relevant goals and policies have been added to Appendix 3.1-A. Their inclusion in Appendix 3.1-A does not affect the results of either the environmental analysis or the policy consistency analysis. Please refer to Sections 16.5.2 and 16.24 in Chapter 16 of the Final EIR/EIS for these changes.

22.42.41 1748

As inferred from the comment, the individual general plan elements are accurately dated in this table. Although redundant, the text indicating the most recent general plan amendment is not incorrect and does not affect the environmental analysis. No revisions have been made to the Draft EIR/EIS in response to this comment.

22.42.42 1749

The comment requests the addition of policy LU 13.4 from the Boyle Heights Community Plan to Table 3.12-1. The policy has been added in Section 16.5.12 in Chapter 16 of the Final EIR/EIS. Additionally, the comment refers to comment #1744 above, which requests revisions to mentions of the Boyle Heights Community Plan. As indicated in the response to comment #1744, the Boyle Heights Community Plan adoption date has been clarified. This clarification also pertains to footnotes.

22.42.43 1750

The comment requests the inclusion of Boyle Heights Community Development Plan policies LU 13.4, LU 6.1, LU 6.3, MC 1.4, and PO 3.4 in Table 3.13-1. The policies have been added in Section 16.5.13 in Chapter 16 of the Final EIR/EIS. Their inclusion does not affect the results of the environmental analysis.

Additionally, the comment mentions prior comment #1744 above, which requests revisions to mentions of the Boyle Heights Community Plan. As indicated in response to comment #1744, the Boyle Heights Community Plan adoption date has been clarified. This clarification also pertains to footnotes.

22.42.44 1751

The requested revision has been made in Section 16.5.13 in the Final EIR/EIS and does not affect the environmental analysis.

22.42.45 1752

The comment expresses support of the proposed Shared Passenger Track Alternative A light maintenance facility (LMF) site, preferring it over that of Shared Passenger Track Alternative B, citing efficiency, fewer property acquisitions needed, and less potential for conflict with the Downtown Community Plan's land use designations, goals, and policies.

Please note that Draft EIR/EIS Chapter 8, Preferred Alternative, identified Shared Passenger Track Alternative A (including its LMF site) as the Preferred Alternative.

No revisions have been made to the Draft EIR/EIS in response to this comment.

22.42.46 1753

Please refer to the response to comment #1714 above.

22.42.47 1754

The comment requests clarifications to mentions of the City of Los Angeles Adaptive Reuse Cultural Resources Ordinance amendment's 2025 adoption date in Table 3.17-2 and to any other City of Los Angeles plans, policies, and ordinances mentioned in the City of Los Angeles's other comments. The requested clarifications to the City of Los Angeles Adaptive Reuse Cultural Resources Ordinance amendment's 2025 adoption date have been made in Section 16.5.17, Section 3.17: Cultural Resources, in Chapter of the Final EIR/EIS.

22.42.48 1755

The Draft EIR/EIS concluded that the introduction of the safety barriers results in an adverse effect because a barrier of any design would introduce a visual intrusion that is incompatible with the bridges' designs. The analysis does not discuss the Secretary of the Interior's Standards for the Treatment of Historic Properties, because no barrier designed to meet the safety requirements (solid barriers 8 feet or taller flanking both sides of the bridge across the entire railroad right-of-way or 30 feet from the centerline of the outermost track) could be designed to meet the Secretary of the Interior's Standards for the Treatment of Historic Properties.

CUL-MM#12, Design Review for Intrusion-Protection Barriers, will be carried out, which includes consultation with the State Historic Preservation Officer and other Consulting Parties to achieve the goal of designing a safety barrier with minimum physical and visual effects on the historic bridges. As noted above, even with the application of CUL-MM#12, the project would result in an adverse effect on the four historic bridges.

The City of Los Angeles, Office of Historic Resources, is a "concurring party" listed on the draft Memorandum of Agreement. Therefore, the Authority will coordinate with the agency about the design of the barriers in accordance with CUL-MM#12.

22.42.49 1756

The comment refers to two previous comments, #1743 and #1744 above, which request revisions to mentions of the City of Los Angeles Mobility Plan 2035 and the Boyle Heights Community Plan. As indicated in the responses to those comments, the Mobility Plan 2035 and the Boyle Heights Community Plan adoption dates have been clarified as 2016 and 2024, respectively, wherever portrayed otherwise, in the Final EIR/EIS. This clarification also pertains to Appendix 3.1-A.

22.42.50 1757

Please refer to response to comment #1715 above.

Los Angeles to Anaheim - RECORD #013969 DETAIL

Status:	Action Pending
Record Date:	02/11/2026
Interest As:	Local Agency
Full Name:	Jessica Serrano

Stakeholder Comments/Issues:

[Please refer to the attached transcript for the demarcation of oral comments delivered by this submitter during the public hearing.]

MS. HERNANDEZ: Thank you, Tony, for your comment.

All right. Looks like we have another raised hand. Edgar Machado, you are up next. Please provide your first name, last name, and proceed with your comment.

MR. MACHADO: Hello. Good afternoon. My name's Edgar Machado. I live in San Diego, California, and I travel very often to this area and Los Angeles. I just want to say I'm a big fan of High-Speed Rail, and I wish it was already here.

And I know it's going, and I've been hearing these public meetings. And it's going slow, but I just want to say please continue working and listen to the community. I know it's impossible to please everybody, but this is important work, and it's already been decided, so yes, please continue. And I just wanted to say that. Thank you so much.

MS. HERNANDEZ: Thank you, Edgar, for your comment.

All right. Up next, we have Jessica Serrano. Jessica, please provide your full name and your comment.

MS. SERRANO: Hi, everyone. Can you hear me?

MS. HERNANDEZ: Yes, we can hear you.

MS. SERRANO: Great. Thank you so much. I'm Jessica Serrano. I'm representing the City of Commerce. Thank you for this opportunity to speak 1879 on this item. The City is not opposed to High-Speed Rail, but we are concerned about its impacts onto our local businesses and residents.

In a prior presentation, there was mention that 26 homes would be impacted. We'd -- we'd like to get more information about where those homes are located, if anywhere in -- in the City of 1880 Commerce. We also are concerned about the track removal at Hobart IMF straddling the City of Commerce and Vernon as it will eliminate very large segment of Washington in the -- within the City of Commerce.

The City is concerned as to the impacts that this will have on our local economy. We'd urge the committee to consider the alternative in the city of Los Angeles, as that wouldn't impact our local economy here in Commerce as much. And we also would like to find out more information about what property acquisitions are occurring in the City of Commerce.

1881 And we also respectfully ask that you extend the comment period for an additional time since the City needs additional time to put together our

1882

concerns in writing. So I'd like to request that once again. I -- I would also like to have a special -- or not a special -- a follow-up meeting with the -- with the -- the technical team here to ask more specific questions on -- on the project.

1883

And once again, we're -- you know, our community is already heavily impacted by heavy industrial uses, railroads, truck traffic, and more, and manufacturing uses here in the city, and so we want to make sure that our community, our residents are kept safe and that they're not further impacted by the impacts of -- of potential impacts of the high-speed rail coming through our city.

And we also want to preserve our -- our local economy, and so we think this might be negative impact on our -- on our community. Thank you very much.

MS. HERNANDEZ: Thank you, Jessica, for your comment.

All right. Looks like we have another raised hand. Grady Yu, you're up next. Please provide your first name, last name, and you'll have three minutes to provide your comment.

MR. YU: Can you hear me?

MS. HERNANDEZ: Yes, we can hear you.

22.43 Response to Submission 013969 (Jessica Serrano, City of Commerce, Feb 11, 2026)

22.43.1 1879

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-02: Impacts on Businesses, in Chapter 18, Standard Responses.

The commenter expresses concern about potential impacts on businesses and residents in Commerce, and notes a high-speed rail presentation that described "26 homes that would be impacted," with additional concern that some or all of these might be in Commerce. In Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) Section 3.4, Noise and Vibration, Table 3.4-16 clarifies that the 26 residences expected to experience severe noise impacts during operation are in Pico Rivera and Anaheim. None of the cited 26 residences is in Commerce. Moreover, in Section 16.5.4, Section 3.4: Noise and Vibration, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS the number of sensitive receivers who will benefit from noise mitigation was revised. This reduced the number of residences with a severe noise impact from 26 to 23. For further information on impacts on businesses and residents in Commerce, refer to Section 3.12, Socioeconomics and Communities, and Chapter 5, Community Analysis, of the Draft EIR/EIS.

22.43.2 1880

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-02: Impacts on Businesses, in Chapter 18.

Refer to Standard Response LAA-Response-Section 3.12 SOCIO-03: Property Values, in Chapter 18.

Section 3.12 of the Draft EIR/EIS includes a detailed analysis of the economic impacts from the project in Commerce. The project would displace an estimated 115 businesses (58 commercial and 57 industrial businesses) and 1,101 employees (Impact SO-3). As a point of clarification, some of these displacements would occur in different parts of the city, and are not associated with the BNSF Railway (BNSF) truck parking relocation. As presented in Table 3.12-27 and Table 3.12-28, there would be a surplus of suitable industrial replacement sites, but only 15 available commercial sites in Commerce. For commercial businesses without a suitable replacement, alternative locations have been identified in surrounding areas. If all displaced businesses are able to relocate to available units, the deficit of 43 commercial units in Commerce would result in sales and use tax loss of 1.21 percent (Impact SO-8). If none of the displaced businesses are able to relocate in Commerce, there would be a loss in sales and use tax revenue of 2.52 percent. Any potential for revenue lost would be partially offset by increased sales tax revenue generated during construction. Overall, revenue losses would be relatively small and are not anticipated to result in the physical deterioration of government facilities. In addition to property impacts near Hobart Yard, there would also be impacts on three city-owned parcels, which are the site of the current Commerce Metrolink Station, which would be relocated to the east. After the station is relocated, the parcels would be needed to support the Commerce Flyover and modifications to Commerce Yard, because the right-of-way in this area would be expanded to the south to accommodate the flyover structure and shifted BNSF tracks.

The commenter states a preference for Shared Passenger Track Alternative B. To clarify, under Shared Passenger Track Alternative B, the modifications to Hobart Yard would still occur, which include the new storage and staging tracks south of Hobart Yard and relocating the BNSF truck parking to the north along Washington Boulevard. The potential impacts that would occur in Commerce would be nearly the same between the two alternatives, with only slight differences related to construction at the Exide site in Vernon, as discussed in Section 3.10, Hazardous Materials and Wastes, of the Draft EIR/EIS.

22.43.3 1881

Refer to Standard Response LAA-Response-GENERAL-08: Requests for Extension of the Comment Period, in Chapter 18.

The California High-Speed Rail Authority (Authority) contacted the commenter on January 28, 2026, and informed them that the Authority would not be able to extend the comment period.

22.43.4 1882

The Authority contacted the commenter on January 26, 2026, and provided meeting times for further discussion. A meeting was held on February 2, 2026, to discuss the project and a link to the Digital Toolkit was also provided to the commenter.

22.43.5 1883

Regarding economic impacts on Commerce, refer to response to comment #1880 above. All other potential environmental impacts that would occur in Commerce are evaluated in the Draft EIR/EIS.