23 RESPONSES TO COMMENTS FROM BUSINESSES AND ORGANIZATIONS

Los Angeles to Anaheim - RECORD #013253 DETAIL

Status:	Action Pending
Record Date:	12/05/2025
Interest As:	Business and/or Organization
Full Name:	Miguel Vargas

Stakeholder Comments/Issues:

0134 Dear High Speed Rail team, I am requesting an electronic copy of the Los Angeles to Anaheim Project Section Draft Environmental Impact Report / Environmental Impact Statement (EIR/EIS) for the California High-Speed Rail (HSR) system. Please send me all related documents. Thank you, -- Miguel Vargas Executive Director 24-hour hotline

23.1 Response to Submission 013253 (Miguel Vargas, LA Arts District, Dec 5, 2025)

23.1.1 0134

The California High-Speed Rail Authority contacted the commenter on December 6, 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 #013288 DETAIL

Status:	Action Pending
Record Date:	12/08/2025
Interest As:	Business and/or Organization
Full Name:	Georgia Kokkinias

Stakeholder Comments/Issues:

0158 Hi, this is Georgia Kokkinias. I am director of real estate for Packaging Corporation of America. And I received a notification about the high-speed rail possibly impacting our plant. When someone gets this message, please give me a call on my mobile. My number is . Again, Georgia Kokkinias with Packaging Corporation of America, . Thank you.

23.2 Response to Submission 013288 (Georgia Kokkinias, Packaging Corporation of America, Dec 8, 2025)

23.2.1 0158

The California High-Speed Rail Authority contacted the commenter on December 8, 2025, and provided information regarding their property in relation to the project. 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 #013290 DETAIL

Status:	Action Pending
Record Date:	12/08/2025
Interest As:	
Full Name:	James Thomas

Stakeholder Comments/Issues:

0136

Hello, Can you please provide a copy of this source? It was cited in Chapter 2. Authority, 2020c. Memorandum: Removal of the Burlington Northern and Santa Fe Railway (BNSF) Staging Tracks Mitigation within the Cities of Hesperia and Victorville, San Bernardino County from the Los Angeles to Anaheim Environmental Document James Thomas Kimley-Horn | 1100 W Town and Country Road, Suite 700, Orange, CA 92868 Direct: 619.798.5658 | Mobile: Connect with us: Twitter| LinkedIn | Facebook | YouTube Celebrating 18 years as one of FORTUNE's 100 Best Companies to Work For

23.3 Response to Submission 013290 (James Thomas, Kimley-Horn, Dec 8, 2025)

23.3.1 0136

The California High-Speed Rail Authority contacted the commenter on January 16, 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 #013301 DETAIL

Status:	Delimited
Record Date:	12/09/2025
Interest As:	Business and/or Organization
Full Name:	James Unknown

Stakeholder Comments/Issues:

0242 Dear LaDonna DiCamillo, I'm James from Remake Irvine Streets for Everyone (RISE). We are a local advocacy group for safer streets in Irvine, CA. I saw the release of the DEIR for the CA HSR segment to Anaheim. We think there is an opportunity to discuss the potential of Irvine as the terminal station, as circumstances have changed since the original 2009 decision, especially regarding grade separated ROW. Would you be open to having a one on one meeting with us to discuss this? Sincerely, James

23.4 Response to Submission 013301 (James [Surname Unknown], Remake Irvine Streets for Everyone, Dec 9, 2025)

23.4.1 0242

The California High-Speed Rail Authority contacted the commenter on January 26, 2026, and provided an opportunity for office hours per the commenter's request. 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 #013318 DETAIL

Status:	Action Pending
Record Date:	12/10/2025
Interest As:	Business and/or Organization
Full Name:	Eric Johnson

Stakeholder Comments/Issues:

0138

Amphibian populations are declining worldwide, and amphibians are experiencing high extinction rates due to habitat loss, chytrid fungus, pollutants, pesticides, invasive species, and climate change. Amphibians are the most threatened class of vertebrates. We support the California High-Speed Rail Los Angeles to Anaheim Project. High-speed rail will reduce greenhouse gas emissions from the transportation sector, which will benefit amphibians. Please ensure that amphibians will not be negative impacted by the project. Conduct amphibian surveys in potential habitats, such as wetlands and vernal pools. If amphibians are located, relocate the amphibians to a protected area. If needed, provide amphibian rail crossings, such as culverts and pipes. References: Catenazzi, A. 2015. State of the World's Amphibians. Annual Review of Environment and Resources, 40: 91-119. Collins, J.P., and M.L. Crump. 2009. Extinction in Our Times: Global Amphibian Decline. New York, NY: Oxford University Press. International Union for the Conservation of Nature. 2024. Amphibian Conservation Action Plan. Gland Switzerland: International Union for the Conservation of Nature. Kolbert, E. 2014. The Sixth Extinction, an Unnatural History, Chapter 1. New York, NY: Bloomsbury. Luedtke et al. 2023. Ongoing Declines for the World's Amphibians in the Face of Emerging Threats. Nature, Volume 622, 12 October 2023, 308-314. McCallum, M.L. 2007. Amphibian Decline or Extinction? Current Declines Dwarf Background Extinction Rate. Journal of Herpetology, Volume 41, Number 3, pp. 483-491.

23.5 Response to Submission 013318 (Eric Johnson, Amphibian Refuge, Dec 10, 2025)

23.5.1 0138

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

Section 3.7, Biological and Aquatic Resources, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) provides a detailed analysis of impacts on biological and aquatic resources, including wildlife, fish, plants, and their habitats. As discussed in Section 3.7.4.3, Methods for Impact Analysis, vegetation mapping was conducted to (1) identify suitable habitat for special-status wildlife species and (2) quantify direct effects on special-status wildlife species based on habitat mapping. Of the 60 special-status wildlife species that were evaluated, only 20 were determined to have potential to occur in the Wildlife resource study area (RSA). The lack of open space and the fragmentation and disturbance of the remaining open space in the Wildlife RSA have precluded the presence of almost all of the special-status herpetofauna. No special-status amphibians are expected in the Wildlife RSA. No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013333 DETAIL

Status:	Action Pending
Record Date:	12/12/2025
Interest As:	Business and/or Organization
Full Name:	Jesus Garcia

Stakeholder Comments/Issues:

0882 Question, regarding how this project will affect the intersection of Norwalk Blvd and Los Nietos Rd in Santa Fe Springs. Parents own lot on this corner and over 20 years ago were informed of a train project that would require removing the Angelo's burgers building and also some modifications to his Auto upholstery shop. Both of these buildings on parents' lot. Would like to know if this project would still require a similar impact. Who can we speak to?

23.6 Response to Submission 013333 (Jesus Garcia, Ramon's Custom Auto Upholstery, Dec 12, 2025)

23.6.1 0882

The California High-Speed Rail Authority met with the commenter during office hours on January 15, 2026, and provided requested materials, as well as information regarding their property in relation to the project. 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 the comment.

Los Angeles to Anaheim - RECORD #013336 DETAIL

Status:	Delimited
Record Date:	12/12/2025
Interest As:	Business and/or Organization
Full Name:	Katie Alania

Stakeholder Comments/Issues:

0241

Good afternoon, This is a request for an electronic copy (PDF preferred) of the Los Angeles to Anaheim Project Section Draft EIR/EIS. Please share the tier 1 and tier 2 versions where applicable. In addition, other files that may not be posted on the HSR.CA.Gov website. Thank you, Katie Alania G3 Enterprises, Inc. 502 E. Whitmore Ave, Modesto, CA 95358 C | F https://www.g3enterprises.com/ View our properties at www.g3property.com/property-listings THE INFORMATION CONTAINED IN THIS EMAIL IS CONFIDENTIAL. THIS EMAIL IS INTENDED ONLY FOR THE USE OF THE ADDRESSEE(S). IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE NOTIFY US IMMEDIATELY AND DELETE THE MESSAGE AND ANY ATTACHED FILES. ANY USE, MODIFICATION, OR REPUBLICATION OF THIS COMMUNICATION, INCLUDING ANY ATTACHED FILES IS PROHBITED UNLESS EXPRESSLY AUTHORIZED BY G3 ENTERPRISES,INC. WE SPECIFICALLY DISCLAIM RESPONSIBILITY FOR ANY UNAUTHORIZED USE OF THIS EMAIL OR ANY ATTACHMENTS TO IT. UNLESS SPECIFICALLY STATED, THIS EMAIL DOES NOT CONSTITUTE A COMMITMENT BY THE SENDER OR G3 ENTERPRISES,INC

23.7 Response to Submission 013336 (Katie Alania, G3 Enterprises, Dec 12, 2025)

23.7.1 0241

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 #013354 DETAIL

Status:	Unread
Record Date:	12/15/2025
Interest As:	Business and/or Organization
Full Name:	Deborah Diep

Stakeholder Comments/Issues:

0154 Hello. I am requesting the following Los Angeles to Anaheim Project Section Technical Reports: Transportation Technical Report Air Quality and Global Climate Change Technical Report Noise and Vibration Technical Report Community Impact Assessment Draft Relocation Impact Report Aesthetics and Visual Quality Technical Report Thank you. Deborah S. Diep Director Center for Demographic Research 1121 N. State College Blvd., Suite 238 Fullerton, CA 92831- www.fullerton.edu/cdr

CONFIDENTIALITY NOTICE: This e-mail and any attachments, including documents, files, or previous e-mail messages, may contain confidential information that is legally privileged intended for the sole use of the designated recipient(s). If you are not the intended recipient, or a person responsible for delivering it, you are hereby notified that any disclosure, copying, distribution, or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error please destroy the original transmission and its attachments without reading or saving in any manner and immediately notify the sender by return e-mail. Thank you.

23.8 Response to Submission 013354 (Deborah Diep, Center for Demographic Research, Dec 15, 2025)

23.8.1 0154

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 change has been made to the document in response to this comment.

Los Angeles to Anaheim - RECORD #013546 DETAIL

Status:	Action Pending
Record Date:	01/07/2026
Interest As:	Other
Full Name:	Nicholas R. Ghirelli

Stakeholder Comments/Issues:

0370 Hello, my name is Nicholas Ghirelli. I'm calling to request immediately copies of the technical reports for the Draft EIR/EIS. Those reports can be emailed to . The email address is spelled N as in Nick, . That's . Please include another copy to Travis Kaya at . That's . If you have any questions, please contact me at . Again, my number is . Thank you. I'm asking for a prompt access to the technical reports accompanying the Draft EIR/EIS for the LA to Anaheim section and I'm calling this number because the website directs me to call this number in order to get access. Thank you, bye bye.

23.9 Response to Submission 013546 (Nicholas R. Ghirelli, Richards Watson Gershon Law, Jan 7, 2026)

23.9.1 0370

The California High-Speed Rail Authority contacted the commenter on January 8, 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 #013551 DETAIL

Status: Action Pending
Record Date: 01/07/2026
Interest As: Business and/or Organization
Full Name: Jack Miranda

0377

Stakeholder Comments/Issues:

Bravo. Hurry

23.10 Response to Submission 013551 (Jack Miranda, Jesse Miranda Center, Jan 7, 2026)

23.10.1 0377

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

Los Angeles to Anaheim - RECORD #013589 DETAIL

Status:	Ready for Delimiting
Record Date:	01/08/2026
Interest As:	Business and/or Organization
Full Name:	Lisa Henschol

Stakeholder Comments/Issues:

0240

Dear Personnel, I want to give my wholehearted endorsement of the high speed rail line to Anaheim. I think it's a wonderful idea and will give all Californians an ability to seek employment in many different communities as well as give employers a broader base from which to hire. High speed rail is a great idea and I fully support it. Lisa Henschol 90027 -- Hyperion Academics www.hyperionacademics.com accounting@hyperionacademics.com (949) 44 LEARN

23.11 Response to Submission 013589 (Lisa Henschol, Hyperion Academics, Jan 8, 2026)

23.11.1 0240

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

Los Angeles to Anaheim - RECORD #013666 DETAIL

Status:	Action Pending
Record Date:	01/14/2026
Interest As:	Business and/or Organization
Full Name:	Monica Sigismondo

Stakeholder Comments/Issues:

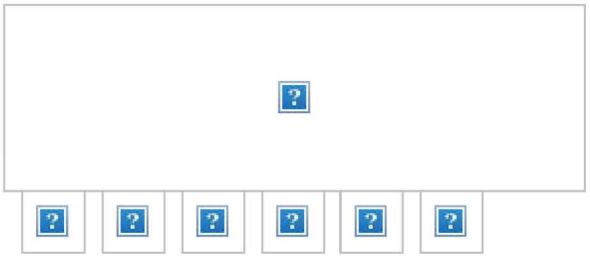
0867 good morning,id like to know if any tunnel is previewed in the Los Angeles–Anaheim Section project. tel thanks in advanceMonica Sigismondo Tunnelbuilder Ltd www.tunnelbuilder.itwww.tunnelbuilder.com Content Writer and Editor Business Development Manager cell:

From: Hules, Katta@HSR
To: Kesting, Rachel@HSR; Patrick, Jim@HSR
Cc: Contreras Diaz, Daniela@HSR
Subject: FW: information about Los Angeles–Anaheim Section project
Date: Monday, January 12, 2026 8:10:45 AM
Importance: High

Good morning,

Forwarding a So Cal question that we got in the info box. Can we leave this with you?

Thanks!
Katta Hules (she/her)
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814
(916) 827-8562
www.hsr.ca.gov



From: Monica Sigismondo <monica@tunnelbuilder.com>
Sent: Sunday, January 11, 2026 2:21 PM
To: HSR info@HSR <info@hsr.ca.gov>
Cc: monica.sigismondo@libero.it
Subject: information about Los Angeles–Anaheim Section project
Importance: High

Non ricevi spesso messaggi di posta elettronica da monica@tunnelbuilder.com. Scopri perché è importante

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

good morning,
i d like to know if any tunnel is previewed in the Los Angeles–Anaheim Section project. tel +39 347 7525052

thanks in advance

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monica.sigismondo@libero.it

23.12 Response to Submission 013666 (Monica Sigismondo, Tunnelbuilder, Jan 14, 2026)

23.12.1 0867

The Los Angeles to Anaheim Project Section Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) does not include any tunnels. As described in Chapter 2, Alternatives, of the Draft EIR/EIS, there is a trench segment in Fullerton, which is required to avoid conflict with the Fullerton Municipal Airport.

Los Angeles to Anaheim - RECORD #013667 DETAIL

Status:	Action Pending
Record Date:	01/14/2026
Interest As:	Business and/or Organization
Full Name:	Dick Ackerman

Stakeholder Comments/Issues:

0403 Hi this is Dick Ackerman. I was wondering if you guys put speakers out for rotary clubs. I'm with the Fullerton Rotary Club. I'm at . Thanks much bye

23.13 Response to Submission 013667 (Dick Ackerman, Fullerton Rotary Club, Jan 14, 2026)

23.13.1 0403

The California High-Speed Rail Authority contacted the commenter on February 2, 2026, and scheduled a speaker's bureau for summer of 2026. 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.

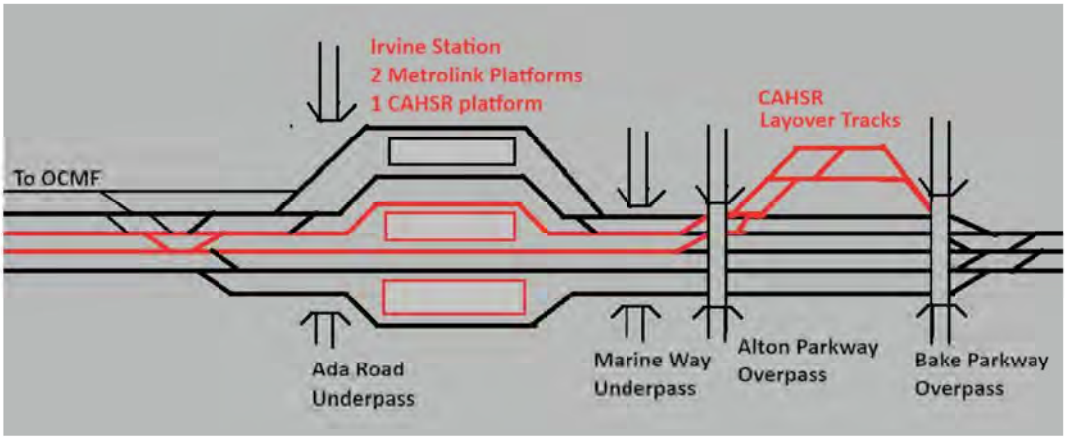
Los Angeles to Anaheim - RECORD #013671 DETAIL

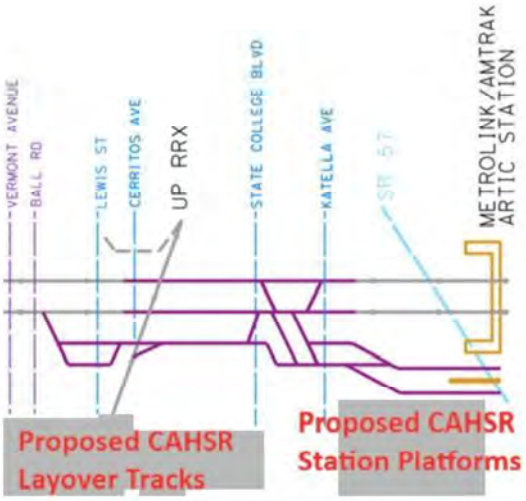
Status:	Action Pending
Record Date:	01/14/2026
Interest As:	Business and/or Organization
Full Name:	Unknown Unknown

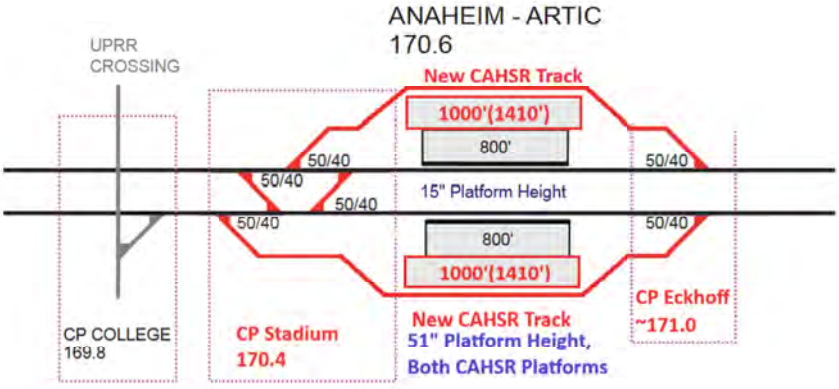
Stakeholder Comments/Issues:

0390 Dear CA HSR Authority, I am writing on behalf of RISE (Remake Irvine Streets for Everyone), a local advocacy group based in Irvine, in regards to the Los Angeles to Anaheim Project Section draft EIR. We urge you to ensure that the Anaheim terminus is designed to easily facilitate a future extension to a terminus at Irvine. The original CA HSR study included an option for an Irvine terminal station, and a possible Irvine station is explicitly mentioned in Proposition 1A. The Irvine stop was dropped due to cost concerns, but that was based on the original plan to have LA-to-Orange County use a dedicated grade-separated ROW. In the time since Irvine was dropped from the project, the Authority decided to instead share tracks with Metrolink/Amtrak, which greatly reduces the cost and impact to surrounding communities to extend HSR to Irvine. We do not think it is worth delaying the EIR to include an Irvine terminus. Instead, we are advocating that the design at Anaheim take this possibility into account, with the goal of eventually doing a separate EIR for an Anaheim-to-Irvine extension. An eventual Irvine terminal station would have several benefits over the Anaheim terminal station. Irvine itself is the fastest growing city in Orange County and likely to surpass Anaheim in population by the time HSR reaches there. For southern Orange County, an Irvine terminus would mean easier access to a one-seat HSR ride all the way to the Bay Area.This all means higher ridership for CA HSR and economic benefits to the state as a whole. For Metrolink and LOSSAN, an Irvine terminus means electrified ROW south of Anaheim, enabling electrified regional rail service similar to Caltrain to the cities of Orange, Santa Ana, Tustin, and Irvine, with an incremental cost for Metrolink to extend electrification to Laguna Niguel / Mission Viejo. This would enable electric regional rail service using conventional EMUs for the bulk of Metrolink's
0391 SCORE program, and dual-mode LOSSAN and Metrolink service for trains serving points south. For CA HSR and Metrolink, an Irvine terminus simplifies operations due to less interference with each other. The proposed Anaheim terminal is a highly constrained location which causes conflicts between HSR and Metrolink operations and its arrangement requires multiple slow-speed turnouts. Below is part of the current configuration design at Anaheim station, taken from Volume 3 of the CAHSR Los Angeles - Anaheim Draft EIR. HSR trains share tracks with Metrolink and then pull off to side platforms at Anaheim. For southbound trains, this is easy, since the HSR station tracks are to the south of the Metrolink tracks. However, for northbound trains, this requires a slow speed crossover move that crosses over through the southbound Metrolink tracks, effectively blocking southbound Metrolink trains while northbound HSR trains pull out. Additionally, there is the potential to block both HSR platforms during a "switchback" move to access the layover tracks. Extending CAHSR from Anaheim would also have significant sunk costs as the station would be reconfigured as a mid-line station and the layover tracks -- including considerable modifications to the Lewis St. and Cerritos Ave. grade crossings -- would be rendered redundant. With an Irvine terminal station, the Anaheim station could have the HSR tracks constructed outside the Metrolink tracks, which avoids interference and takes advantage of a lighter axle loading to reduce the impacts to Douglas Road. The site can also include larger turnouts which allow for higher operating speeds and therefore smoother operations.
0392 Irvine station is located on a long section of tangent track and is already subject to a Metrolink / OCTA study adding a quadruple track station to allow for more efficient cross-platform transfers between Metrolink trains and originate / terminate services from the future Orange County Maintenance Facility without significant disruption. As these improvements are still in preliminary design, it would be possible to include an additional platform for CAHSR and layover tracks south of the existing station, located within the Metrolink right-of-way or adjacent to it. When combined with other improvements in Irvine such as the Marine Way and Ada Road underpasses, the Great Park Gateway, and plans to connect Irvine Spectrum to the train station, this station would be connected to major destinations and also benefit from the planned Irvine housing element. In the event CAHSR extends to San Diego over conventional rail (provided that the oceanfront San Clemente and Del Mar sections are bypassed and electrified as part of climate resiliency efforts), there will be less throwaway costs associated with this terminal design and the proposed layover tracks could be used for Metrolink/LOSSAN or CAHSR to stage trains for special events, such as concerts at the Irvine Amphitheater, or to stage maintenance of way equipment for work windows. While an Irvine terminus would not be part of the CAHSR Los Angeles to Anaheim project section due to how far along the EIR is, we strongly urge you to ensure the environmental footprint to construct a station at Anaheim does not preclude the option for an Irvine

0392 terminus in the future. Anaheim should be permitted and designed such that a future extension south to an eventual Irvine terminus or access to points further south is as easy and cost-effective as possible. Signed, Remake Irvine Streets for Everyone


Irvine Station
2 Metrolink Platforms
1 CAHSR platform
CAHSR
Layover Tracks
To OCMF
Ada Road
Underpass
Marine Way
Underpass
Alton Parkway
Overpass
Bake Parkway
Overpass


VERMONT AVENUE
BALL RD
LEWIS ST
CERRITOS AVE
UP RRX
STATE COLLEGE BLVD
KATELLA AVE
SR 57
METROLINK/AMTRAK
ARTIC STATION
Proposed CAHSR
Layover Tracks
Proposed CAHSR
Station Platforms


ANAHEIM - ARTIC
170.6
UPRR
CROSSING
New CAHSR Track
1000'(1410')
800'
50/40
50/40
50/40
50/40
50/40
50/40
15" Platform Height
800'
1000'(1410')
CP COLLEGE
169.8
CP Stadium
170.4
New CAHSR Track
51" Platform Height,
Both CAHSR Platforms
CP Eckhoff
~171.0

23.14 Response to Submission 013671 (Unknown, Remake Irvine Streets for Everyone, Jan 14, 2026)

23.14.1 0390

The commenter requests that the Anaheim Regional Transportation Intermodal Center (ARTIC) station terminus is designed to facilitate a future extension to Irvine. During this phase of the project, the terminus is at 15 percent design. The terminus concepts (including potentially accommodating a future extension south of Anaheim) would be refined in later phases of design, in coordination with the cities and stakeholders. Note that the 2009 Preliminary Alternatives Analysis Report evaluated and consequently eliminated a route between Anaheim and Irvine because of potential high costs and complexities with construction and right-of-way. A trench segment would have been required in the cities of Orange and Santa Ana, and there was considerable stakeholder opposition to the alignment. As stated in the 2023 Supplemental Alternatives Analysis, high-speed rail (HSR) service beyond Anaheim to Irvine may be considered separately in the future. Additional studies would be prepared for future phases when funding is available. No revisions have been made to the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) in response to this comment.

23.14.2 0391

The commenter states that the Anaheim terminus design is constrained and would cause conflicts between HSR and Metrolink operations, and suggests an alternate configuration. Although there would be conflicting crossing movements between the southbound Metrolink trains and northbound HSR trains coming out of ARTIC, they are within reasonable operational parameters. The conflicting movements would be scheduled such that there would not be any delays. Moreover, the commenter's proposed configuration would not alleviate those conflicts.

23.14.3 0392

The commenter suggests adding an additional platform for HSR and layover tracks south of ARTIC, within the existing right-of-way. Currently, the project is at 15 percent level of design. The station plans in the Draft EIR/EIS are conceptual; at this phase of design, they are meant to depict the overall station programming and access. The station concepts would be refined in later phases of design, in coordination with the cities and stakeholders. Refer to response to comment #0390 above.

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

Los Angeles to Anaheim - RECORD #013685 DETAIL

Status:	Unread
Record Date:	01/16/2026
Interest As:	Business and/or Organization
Full Name:	Brian Yanity

Stakeholder Comments/Issues:

[Please refer to the attached transcript for the demarcation of oral comments delivered by this submitter during the public hearing.]

the project.

All right. So we are ready to start. I have three requests to speak.

First, I would like to ask James Placek to come forward for your comment. And again, please state your name clearly, any affiliation, and feel free to make your public comment. James?

He had a comment. Maybe he -- I will ask again. Maybe he just stepped out.

Next, we have Brian Yanity from Santa Fe Springs. Can you please come forward, Brian?

MR. YANITY: Hello.

MS. ARELLANO: Can we adjust --

MR. YANITY: Good evening, everyone.

MS. ARELLANO: -- his -- there you go. Yeah, just go ahead and move it so that it can reach him.

MR. YANITY: Okay. I stand like this.

MS. ARELLANO: Okay. Please state your name.

2317

MR. YANITY: Oh. I'm Brian Yanity with the Rail Passenger Association of California and Nevada, or RailPAC. I'm vice president south of that organization. We're an all-volunteer, nonprofit 501(c)(3) that's been around since 1978. And we have

2317

supported high-speed rail in California since 1978.

And I've been a big supporter of this project the whole time, obviously. You know, and at times, we criticized certain aspects of it and execution. But as was mentioned earlier, a lot of those lessons have been learned.

2318

And I'm here to speak today about -- really about the benefits more than the impacts. I feel that the EIR, from what I understand, is a pretty fair analysis of the impacts.

But I think the High-Speed Rail Authority should really emphasize the benefits to Metrolink, to Amtrak, as well as the BNSF Railway as early action -- or early action items, so to speak, when you put in that infrastructure before the actual high-speed rail trains show up from the Central Valley. I think we can have a lot of benefits to Metrolink and Amtrak. Most notably, on-time performance.

Reliability is a big problem between L.A. and Anaheim on really Fullerton to Redondo with a lot of BNSF freight train interference. They messed up their -- you know, a lot of their dispatching. They closed down the dispatch center here in southern California and moved it all to the Fort Worth

2318

headquarters at BNSF, where people didn't know the SoCal system as well. That's getting ironed out a bit.

But the four tracks will be great. You know, be great for Metrolink to increase frequency and improve the reliability.

We also would like to emphasize the electrification infrastructure can be built long before the high-speed rail trains show up with a Caltrain model. You know, that would be -- have to find funding for it, but that would be very beneficial to Metrolink and Amtrak 'cause that increases the ability to accelerate like the Caltrain model of putting in the electric trains, the electric infrastructure between San Francisco and San Jose long before high-speed rail shows up. That's what we have to do here in southern California. Thank you.

MS. ARELLANO: Thank you. And we -- just for you to know, I am keeping time here at the podium, and we'll see if our timer on screen will start working, but we are still keeping track of no more than three minutes per speaker to make sure we have sufficient time for everyone.

Next, if I can call forward Daniel Moreno.

23.15 Response to Submission 013685 (Brian Yanity, Rail Passenger Association of California and Nevada, Jan 16, 2026)

23.15.1 2317

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

23.15.2 2318

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

The commenter's advocacy for emphasis on high-speed rail benefits to Metrolink and Amtrak is noted. Chapter 2, Alternatives, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) describes how the design of project, including modifications to freight and passenger rail infrastructure, would reduce operational conflicts and improve efficiencies for all operators within the corridor. No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013712 DETAIL

Status:	Action Pending
Record Date:	01/21/2026
Interest As:	Business and/or Organization
Full Name:	Steve Lay

Stakeholder Comments/Issues:

To whom it may concern: G3 Enterprises, Inc. (G3) is the manager of the owners of property immediately adjacent to the proposed High-Speed Rail project extending from Los Angeles to Anaheim. Please see G3's comments to the LOS ANGELES TO ANAHEIM DRAFT EIR/EIS attached. Regards, Steve Lay Property Development Manager C. g3enterprises.com

Packaging · Logistics
Minerals · Real Estate

January 21, 2026

ATTN: LOS ANGELES TO ANAHEIM DRAFT EIR/EIS COMMENT
California High-Speed Rail Authority
355 S Grand Ave, Suite 2050
Los Angeles, CA 90071

To whom it may concern:

Thank you for the opportunity to submit comments on the Draft EIR/EIS for the Los Angeles to Anaheim segment of the High-Speed Rail project ("Project"). G3 Enterprises, Inc. ("G3") is the manager of the owners of property immediately adjacent to and north of the proposed High-Speed Rail (HSR) project limits. The Owners are "G3 Enterprises, Inc." (Parcel Number 6334-005-014), "G3 Commerce Rail LLC" (Parcel Number 6334-005-801) and "G3 Realty Two, LLC" (Parcel Number 6334-005-010). Based on review of the Draft EIR and preliminary design exhibits, G3 submits the following comments and requests for clarification.

2852

1. **Mitigation to Avoid Impacts to G3's Existing and Planned Rail Infrastructure**
   G3 plans to reconstruct a new rail spur and switch connection to the existing BNSF Yard Lead. The Project proposes construction of a new Yard Lead track directly north of the existing alignment, extending into G3's property. As proposed, the Project would conflict with both existing and planned rail improvements on G3's property and may necessitate removal, replacement, or realignment of those facilities. The Project proposes permanent right-of-way acquisition affecting approximately 4,199 square feet of Parcel No. 6334-005-014, 3,116 square feet of Parcel No. 6334-005-801 and 2,215 square feet of Parcel No. 6334-005-010, all managed by G3. To mitigate impacts to G3's existing and planned rail infrastructure, we respectfully ask that the alignment be adjusted to the south approximately ten feet to avoid such infrastructure.

   If an adjustment to the location is not feasible, we also ask for clarification on how such impacts will be addressed, including responsibility for design, construction, and associated costs, as well as anticipated construction sequencing, access limitations, and operational disruptions affecting G3 and its tenants. Please also explain what alternatives were considered to the current alignment.

2853

2. **Noise and Vibration Impacts**
   Both construction activities and long-term HSR operations will generate noise and vibration levels that adversely affect the use and enjoyment of the Property by current and future occupants. The Draft EIR does not clearly identify site-specific noise and vibration analyses for the Property.

2853 *Please identify all studies performed to evaluate construction and operational noise and vibration impacts on the Property, including methodologies, assumptions, and proposed mitigation measures to such impacts.*

2854 **3. Gas Pipeline Relocation**

Project plans indicate that a 26-inch high-pressure gas pipeline located at the southwest corner of Parcel No. 6334-005-014 will require relocation. The Draft EIR does not identify the proposed relocation alignment, easement requirements, or construction impacts associated with this utility work.

Please clarify the proposed relocation alignment and plan, including temporary and permanent impacts to the Property, construction duration, access limitations, and coordination with the utility owner.

2855 **4. Eastern Avenue Undercrossing Widening**

The Project proposes widening the Eastern Avenue undercrossing adjacent to and west of the Property. Please clarify whether this work will require roadway closures, detours, or traffic control measures that would affect access to the Property, including impacts to construction traffic, tenant operations, and emergency access and mitigation measures to minimize any disruption to the users of the Property from such widening.

G3 requests that these issues be fully addressed in the Final EIR and that mitigation measures (including those outlined above) be incorporated into the Project to avoid or minimize impacts to occupants, existing and future rail operations on the Property and impacts to the Property.

Respectfully submitted,

1/21/2026

Steve Lay, PE
Property Development Manager
G3 Enterprises – Real Estate
Steven.Lay@G3Enterprises.com

23.16 Response to Submission 013712 (Steve Lay, G3 Enterprises, Inc., Jan 21, 2026)

23.16.1 2852

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-Section 3.12 SOCIO-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18.

The commenter expresses concern about the partial acquisition of three parcels that they manage (Assessor's Parcel Numbers 6334-005-801, 6334-005-010, and 6334-005-014) and impacts on G3's planned new rail spur and switch connection to the existing BNSF Railway (BNSF) yard lead. The proposed acquisitions are depicted in Volume 3.1 of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). Note that based on the California High-Speed Rail Authority's (Authority) records, parcel 6334-005-801 is owned by BNSF, not G3 Commerce Rail, LLC, as noted in the comment.

The right-of-way needs on these parcels are required to build the new BNSF yard lead track into Hobart Yard, as well as for the associated realignment of the spur within parcel 6334-005-801. This yard lead configuration was developed in coordination with BNSF. Shifting the proposed yard track approximately 10 feet to the south would not be feasible because such a shift would directly conflict with the existing BNSF mainline tracks. The current design is the most feasible alternative to meet BNSF's operational needs in this area. The Authority will continue to coordinate with BNSF and G3 Enterprises as both the high-speed rail (HSR) project and G3's planned project advance to ensure they are compatible. The design and timing of G3's planned rail spur will require coordination with BNSF, particularly with regard to its interface with the proposed yard lead.

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

23.16.2 2853

The Draft EIR/EIS includes an evaluation of construction and operational noise and vibration impacts in Section 3.4, Noise and Vibration, supported by the *Los Angeles to Anaheim Project Section Noise and Vibration Technical Report*, which is incorporated by reference.

The property (parcel numbers 6334-005-801, 6334-005-010, 6334-005-014) is used for commercial and industrial purposes that are not considered noise or vibration sensitive in terms of effects on building occupants according to federal guidance. Therefore, the property is not a sensitive receptor and site-specific noise and vibration annoyance impacts were not required for the property.

However, construction noise impacts were evaluated using federal guidance, considering construction activities, equipment types, duration, and proximity to noise-sensitive land uses. To reduce temporary construction noise impacts, the Draft EIR/EIS commits to N&V-MM#1 (Construction Noise Mitigation Measures), which includes limiting construction to permitted hours, use of properly maintained equipment with noise-reduction devices, shutting off idling equipment, maximizing distance between stationary noise sources and sensitive receptors, installing temporary noise barriers or enclosures where feasible, and implementing construction noise monitoring with corrective actions if exceedances occur.

In addition, potential vibration damage impacts on all buildings from construction activities were assessed in Section 3.4.6.3, Project Impacts, of the Draft EIR/EIS. Based on the vibration damage impact screening distances in Table 3.4-14 of the Draft EIR/EIS, vibration impacts are not anticipated at the property. In any case, N&V-MM#2 (Construction Vibration Mitigation Measures) requires preparation of vibration technical memoranda prior to impact pile driving within 80 feet of buildings, use of alternative construction methods where feasible, preconstruction condition surveys, vibration monitoring where sensitive receptors are present, and repair or compensation for any vibration-related building damage attributable to construction. After implementation of N&V-MM#2, impacts related to temporary exposure of sensitive receptors to vibration during construction would be

less than significant with mitigation under the California Environmental Quality Act (CEQA) and not adverse under the National Environmental Policy Act.

Operational noise was analyzed using the Federal Railroad Administration's HSR noise assessment methodology based on train characteristics, operating speeds, service frequency, and hours of operation. Severe operational noise impacts were not identified at the property.

Operational vibration impacts were evaluated using federal criteria considering site conditions, train operations, and distance to sensitive receptors. Vibration impacts were not identified at the property.

Accordingly, the Draft EIR/EIS adequately identifies the studies performed, methodologies used, assumptions applied, and mitigation measures proposed to address construction and operational noise and vibration impacts, consistent with CEQA requirements.

23.16.3 2854

The commenter is correct that the 26-inch high-pressure gas pipeline would require relocation. This is described on page 2-105 in Chapter 2, Alternatives, and depicted on sheet UT-D1528 of the Preliminary Engineering for Project Definition (PEPD) (Volume 3.4 of the Draft EIR/EIS). The PEPD depicts 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 Commerce and utility agencies as the designs progress to ensure that all affected utilities are identified and addressed.

Anticipated utility conflicts for the Shared Passenger Track Alternatives are analyzed under Impact PU&E-6 in Section 3.6, Public Utilities and Energy. As stated in Section 3.6.6.3, Project Impacts, the impact under CEQA on existing utilities during construction of the project would be less than significant. PUE-IAMF#1, Design Measures; PUE-IAMF#3, Public Notifications; and PUE-IAMF#4, Utilities and Energy, are included as part of the project to minimize impacts of temporary interruptions on utility services by requiring coordination with service providers in advance, notifying the public and affected service providers of planned outages, and verifying that new facilities are operational prior to disconnecting the original facility. These project features will ensure that utility interruptions are minimized or avoided and that the public is notified of any expected utility interruptions.

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

23.16.4 2855

As described in Table 3.2-20 in Section 3.2.6.3, Project Impacts, of the Draft EIR/EIS, construction of a new viaduct (Commerce Flyover) and widening of the existing bridge overpass at Eastern Avenue would require temporary short-term lane closures or roadway closures during construction of support segments and decking.

The project incorporates impact avoidance and minimization features to avoid and minimize impacts, including protecting roadways during construction to preserve detours and alternate routes (TR-IAMF#1, Protection of Public Roadways During Construction) and preparing preconstruction transportation plans in coordination with local and regional agencies to ensure safe and efficient emergency access (TR-IAMF#2, Construction Transportation Plan). Off-street parking will be identified to minimize impacts on on-street parking (TR-IAMF#3, Off-Street Parking for Construction-Related Vehicles). Limiting construction deliveries and workforce travel during peak periods will reduce congestion (TR-IAMF#6, Restriction on Construction Hours), and use of designated truck routes will minimize temporary noise and vibration impacts on sensitive receptors (TR-IAMF#7, Construction Truck Routes). Maintaining roadway capacity during special events (TR-IAMF#8, Construction During Special Events) will further reduce congestion and intersection delay associated with temporary lane or roadway closures.

The Eastern Avenue rail bridge would be widened to accommodate the new Hobart Yard lead track and new column to support the viaduct that would be built in the median. The street itself is not proposed to be reprofiled. Therefore, impacts on traffic are anticipated to be limited to temporary lane closures to accommodate construction. A full closure of the roadway may be required for a limited

time to build the viaduct and bridge, but these closures would likely occur during nighttime hours to minimize traffic disruptions. Detailed construction plans would be developed in future design phases in coordination with BNSF, the City of Commerce, and other interested parties.

With respect to potential disruptions to tenant operations, HSR construction activities, including widening of the Eastern Avenue railroad bridge and installation of the new column, would be scheduled to be completed during windows in which potential disruptions to existing freight and passenger rail service would be minimized. Specific work windows would be defined through coordination with freight and passenger rail agencies during subsequent phases of or following project design, pursuant to industry standard practices. The closure windows could be as short as a few hours for minor work or would be scheduled to occur intermittently across 1 to 2 days for more extensive track work. During track closures, freight and passenger rail services could be temporarily rerouted onto one of the other open tracks within the corridor, if needed. The Authority will reduce adverse effects on freight and passenger rail services during project construction by coordinating 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 (TRAN-MM#6, Prepare Track Construction Work Window Plan).

With respect to potential disruptions to emergency access, the Authority-designated contractor would be required to prepare a construction safety transportation management plan that incorporates emergency vehicle access procedures intended to avoid impacts on emergency response times during HSR construction activities (SS-IAMF#1, Construction Safety Transportation Management Plan), including the widening of the Eastern Avenue railroad bridge and installation of the new column. Detours necessary as part of HSR construction activities would be configured to maintain emergency vehicle access and reduce emergency response time delays.

Los Angeles to Anaheim - RECORD #013714 DETAIL

Status:	Action Pending
Record Date:	01/21/2026
Interest As:	Business and/or Organization
Full Name:	Brian Yanity

Stakeholder Comments/Issues:

[The following comments were received in email format as well as in the attached comment letter (duplicative). Please refer to the attached comment letter for the demarcation of individual comments responded to.]Dear CHSRA staff, The Rail Passenger Association of California and Nevada (RailPAC) is an all-volunteer non-profit passenger rail advocacy group, founded in 1978. RailPAC supports the Preferred Alternative, the Shared Passenger Track Alternative A, with 30 miles of new and upgraded track between LA Union Station and Anaheim, with overhead contact system (OCS) electrification, grade separations, station improvements and a new light maintenance facility at 26th Street in the City of Vernon. RailPAC wants to emphasize that expanding the track capacity in the LA-Fullerton rail corridor to four total mainline tracks will greatly benefit Metrolink, Amtrak and BNSF freight trains, along with future high speed rail trains. The 30-mile CHSR project section from LA Union Station to ARTIC is currently shared by Metrolink and Amtrak passenger trains, along with BNSF freight trains. Between LA and Fullerton, Metrolink currently runs a total of 40 weekday trains (the Orange County and 91/Perris Valley lines), and Amtrak runs 26 Pacific Surfliner and two Southwest Chief trains daily. As this segment is also part of BNSF's Southern Transcon mainline between LA and Chicago, it sees an average of nearly 60 freight trains per day. The Orange County line and Surfliner also run on the Fullerton-Anaheim segment (owned by Orange County Transportation Authority), along with several BNSF freight trains a day towards San Diego. The capacity upgrades planned for the LA-Anaheim CHSR segment will result a greater number of trains overall, and much better separation of freight and all passenger trains that share the corridor, greatly increasing reliability and on-time performance of both. We are pleased that the CHSRA recognizes the importance of early action projects that could utilize this LA-Anaheim EIR/EIS, which presents a great opportunity for Metrolink and other public agencies to use CHSRA's environmental approvals to electrify the corridor, add needed track capacity, and build new grade separations. BNSF has agreed to allow OCS on right-of-way it owns, with CHSRA designing the contact wire to be tall enough to double-stack container trains to run underneath. This is very significant achievement for CHSRA, as it is perhaps the first time in many decades that a Class I railroad has agreed to allow new OCS to be constructed on rail right-of-way it owns. Metrolink should run electric trains using the OCS infrastructure covered by this EIS/EIR, which can be built prior to the arrival of high speed trains, following the example of Caltrain between San Jose and San Francisco. Average speeds for Metrolink service will increase, with faster acceleration from electric trains, leading to the 'sparks effect' of increased ridership (well documented following electrification of Caltrain and rail systems around the world). RailPAC also supports the proposed relocations of the Buena Park and Commerce Metrolink stations, which will better serve their respective communities. Thank you for your consideration, -- Best Regards, Brian Yanity Vice President-South and Board Member Rail Passenger Association of California (RailPAC) www.railpac.org Fullerton, CA

RailPAC
Rail Passenger Association
of California and Nevada

P.O. Box 22344
San Francisco CA 94122

www.railpac.org

January 21, 2026

Submitted by email to: Los.Angeles_Anaheim@hsr.ca.gov

Attn: Los Angeles to Anaheim Draft EIR/EIS Comment from RailPAC

Dear CHSRA staff,

0469

The Rail Passenger Association of California and Nevada (RailPAC) is an all-volunteer non-profit passenger rail advocacy group, founded in 1978. RailPAC supports the **Preferred Alternative, the Shared Passenger Track Alternative A,** with 30 miles of new and upgraded track between LA Union Station and Anaheim, with overhead contact system (OCS) electrification, grade separations, station improvements and a new light maintenance facility at 26th Street in the City of Vernon.

RailPAC wants to emphasize that expanding the track capacity in the LA-Fullerton rail corridor to four total mainline tracks will greatly benefit Metrolink, Amtrak and BNSF freight trains, along with future high speed rail trains. The 30-mile CHSR project section from LA Union Station to ARTIC is currently shared by Metrolink and Amtrak passenger trains, along with BNSF freight trains. Between LA and Fullerton, Metrolink currently runs a total of 40 weekday trains (the Orange County and 91/Perris Valley lines), and Amtrak runs 26 *Pacific Surfliner* and two *Southwest Chief* trains daily. As this segment is also part of BNSF's Southern Transcon mainline between LA and Chicago, it sees an average of nearly 60 freight trains per day. The Orange County line and *Surfliner* also run on the Fullerton-Anaheim segment (owned by Orange County Transportation Authority), along with several BNSF freight trains a day towards San Diego. The capacity upgrades planned for the LA-Anaheim CHSR segment will result a greater number of trains overall, and much better separation of freight and all passenger trains that share the corridor, greatly increasing reliability and on-time performance of both.

We are pleased that the CHSRA recognizes the importance of early action projects that could utilize this LA-Anaheim EIR/EIS, which presents a great opportunity for Metrolink and other public agencies to use CHSRA's environmental approvals to electrify the corridor, add needed track capacity, and build new grade separations. BNSF has agreed to allow OCS on right-of-way it owns, with CHSRA designing the contact wire to be tall enough to double-stack container trains to run underneath. This is very significant achievement for CHSRA, as it is perhaps the first time in many decades that a Class I railroad has agreed to allow new OCS to be constructed on rail right-of-way it owns. Metrolink should run electric trains using the OCS infrastructure covered by this EIS/EIR, which can be built prior to the arrival of high speed trains, following the example of Caltrain between San Jose and San Francisco. Average speeds for Metrolink service will increase, with faster acceleration from electric trains, leading to the 'sparks effect' of increased ridership (well documented following electrification of Caltrain and rail systems around the world). RailPAC also supports the proposed relocations of the Buena Park and Commerce Metrolink stations, which will better serve their respective communities.

Thank you for your consideration,

Brian Yanity
Fullerton, CA
Vice President-South, RailPAC

23.17 Response to Submission 013714 (Brian Yanity, Rail Passenger Association of California and Nevada, Jan 21, 2026)

23.17.1 0469

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

Los Angeles to Anaheim - RECORD #013727 DETAIL

Status:	Unread
Record Date:	01/23/2026
Interest As:	Business and/or Organization
Full Name:	James Placek

Stakeholder Comments/Issues:

[Please refer to the attached transcript for the demarcation of oral comments delivered by this submitter during the public hearing.]

Speed Rail Authority consider as it moves forward to eventually oversee the construction of these stations. Thanks.

MS. ARELLANO: Thank you. Thank you, Daniel.

All right. Next, I'd like to call again James Placek, if he is here. He submitted a card to request to speak.

Mr. Placek, please state your name again for the record.

MR. PLACEK: My name is James Placek, owner of J.A. Placek Construction. We're a railroad contractor in Santa Fe Springs.

MS. ARELLANO: Thank you.

2320

MR. PLACEK: In the presentation for the Santa Fe Springs facility, there was not mention that you were going to be building this on a landfill dump. That the cost of this landfill or this landfill dump, the cost of the -- installing the tracks, as well as the building is going to be astronomical. I suggest that you either build the platform parallel where the main line of the railroad's existing tracks or do away with it completely and let Fullerton support you.

MS. ARELLANO: Thank you for your

comment.

MR. PLACEK: Thank you.

MS. ARELLANO: Thank you.

At the current time, I don't have any other additional requests to speak card. But we are here until eight o'clock this evening. So feel free to think about your comment if you would like to come forward and make a verbal comment. We would like to receive your speaker card so I can call your name accordingly.

If we don't have any other speakers, we will just wait a moment here for you to again use the room to ask other questions of our staff that are still available at the back of the room. We will be here until eight o'clock this evening. It's about 6:43 right now.

Anyone else who has an additional comment that you would like to submit formally, please come forward.

Again, if we have no other comments, those of you who are here, you are welcome to stay until eight o'clock this evening. If you've already given a comment and have received answers to your questions from the staff at the back of the room, you are welcome to leave at any time or stay with us

CALIFORNIA High-Speed Rail Authority

Speaker Card

NAME: James A. Placek

DATE: 1/7/26

MEETING LOCATION:

AFFILIATION:

ADDRESS:

EMAIL:

PHONE:

CITY: Santa Fe Spring

STATE: CA

ZIP: 90670

*WOULD YOU LIKE TO BE ADDED TO OUR MAILING LIST? (Check all that apply) Yes

○ STATEWIDE ☒ LOS ANGELES TO ANAHEIM

**WOULD YOU LIKE THE AUTHORITY TO CONTACT YOU? ☒ YES ○ NO

COMMENTS: Santa Fe Spring station

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.

23.18 Response to Submission 013727 (James Placek, J. A. Placek Construction, Jan 23, 2026)

23.18.1 2320

Refer to Standard Response LAA-Response-GENERAL-03: Funding and Project Costs, in Chapter 18, Standard Responses.

The commenter asserts that the project would be built on a landfill in the vicinity of the Norwalk/Santa Fe Springs Metrolink Station. The California High-Speed Rail Authority followed up with the commenter by telephone on July 28, 2026, and confirmed the commenter is referring to a property formerly owned by Neville Chemical Corporation, a site on the Cortese List in the vicinity of the Norwalk/Santa Fe Springs Metrolink Station area, which the commenter indicates had been used as a landfill. The Neville Chemical Corporation site is discussed in Section 3.10, Hazards and Hazardous Materials, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS), along with other potential environmental concern sites. The project includes multiple impact avoidance and minimization features to minimize potential impacts related to release of hazardous materials from both known and unknown sites of concern, 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#6, Spill Prevention; HMW-IAMF#9, Environmental Management System; and GEO-IAMF#3, Gas Monitoring. HMW-IAMF#1 requires environmental site assessments to characterize each parcel, and HMW-IAMF#4 provides controls for known, suspected, and unanticipated environmental contamination. No revisions have been made to the Draft EIR/EIS in response to this comment.

Costs of the project are summarized in Chapter 6, Project Costs and Operations, of the Draft EIR/EIS, including the estimated capital, operations, and maintenance costs for each build alternative and design option, including funding and financial risk.

Los Angeles to Anaheim - RECORD #013729 DETAIL

Status:	Unread
Record Date:	01/23/2026
Interest As:	Individual
Full Name:	Brian Yanity

Stakeholder Comments/Issues:

[The following comments were received via a written comment card.]

2322 The CHSRA plan for LA-Anaheim corridor presents an enormous opportunity for regional rail. Please encourage Metrolink to participate in the electrification of the LA-Anaheim corridor, and seek funding for OCS infrastructure prior to HSR trains arrive in southern California. In other words, Metrolink can utilize this EIR/EIS to electrify the LA-Anaheim corridor as an "early-action" item, similar to how Caltrain's electrification will be usec later by HSR trains, but currently by Caltrain trains. CHSRA should also talk to BNSF about electrification of short-haul freight service between the ports of LA/LB to Barstow. Electric Metrolink and freight trains would greatly increase environmental benefits.

CALIFORNIA High-Speed Rail Authority

Los Angeles to Anaheim Project Section
Draft Environmental Impact Report/Environmental Impact Statement Comment Form

NAME: BRIAN YANITY		DATE: 1/7/2025
AFFILIATION: RAILPAC		
ADDRESS:	EMAIL:	PHONE:
CITY: FULLERTON	STATE: CA	ZIP CODE: 92832

*WOULD YOU LIKE TO BE ADDED TO OUR MAILING LIST? (Check all that apply)

- ☑ STATEWIDE
- ☑ LOS ANGELES TO ANAHEIM

COMMENTS:

THE CHSRA PLAN FOR LA-ANAHEIM CORRIDOR PRESENTS AN ENORMOUS OPPORTUNITY FOR REGIONAL RAIL PLEASE ENCOURAGE METROLINK TO PARTICIPATE IN THE ELECTRIFICATION OF THE LA-ANAHEIM CORRIDOR, AND SEEK FUNDING FOR OCS INFRASTRUCTURE PRIOR TO HSR TRAINS ARRIVE IN SOUTHERN CALIFORNIA. IN OTHER WORDS, METROLINK CAN UTILIZE THIS EIR/EIS TO ELECTRIFY THE LA-ANAHEIM CORRIDOR AS AN 'EARLY-ACTION' ITEM, SIMILAR TO HOW CALTRAIN'S ELECTRIFICATION WILL BE USED LATER BY HSR TRAINS BUT CURRENTLY BY CALTRAIN TRAINS.

CHSRA SHOULD ALSO TALK TO BNSF ABOUT ELECTRIFICATION OF SHORT-HAUL FREIGHT SERVICE BETWEEN THE PORTS OF LA/LB & BARSTOW ELECTRIC METROLINK & FREIGHT TRAINS WOULD GREATLY INCREASE ENVIRONMENTAL BENEFITS

Any information you 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.

COMMENTS MAY BE SUBMITTED IN THE FOLLOWING WAYS:
BY MAIL TO ATTN: LOS ANGELES TO ANAHEIM PROJECT SECTION DRAFT EIR/EIS COMMENT, CALIFORNIA HIGH-SPEED RAIL AUTHORITY, 355 S GRAND AVE, SUITE 2050, LOS ANGELES, CA 90071, THROUGH THE AUTHORITY'S WEBSITE WWW.HSR.CA.GOV, BY EMAIL TO LOS.ANGELES_ANAHEIM@HSR.CA.GOV WITH THE SUBJECT LINE "LOS ANGELES TO ANAHEIM DRAFT EIR/EIS COMMENT," ORAL COMMENT ON THE DIRECT LINE FOR THE LOS ANGELES TO ANAHEIM PROJECT SECTION BY CALLING (877) 669-0494, OR ORAL AND WRITTEN COMMENT AT PUBLIC HEARINGS.
.Y, ELECTRONICALLY, OR WRITTEN AND BY MAIL POSTMARKED ON OR BEFORE 11:59 PM PST FEBRUARY 3, 2026.

23.19 Response to Submission 013729 (Brian Yanity, Rail Passenger Association of California and Nevada, Jan 23, 2026)

23.19.1 2322

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

The commenter encourages an early electrification of the corridor. The California High-Speed Rail Authority (Authority) is coordinating with Metrolink and all other operators within the corridor, but there is no current plan to electrify the corridor as an early action plan. Metrolink is separately studying strategies to achieve a zero-emission fleet in support of the goals outlined in its Southern California Optimized Rail Expansion program, but it is not dependent on an overhead catenary system. The Authority will continue to coordinate with the other freight and passenger rail operators to identify ways to deliver project benefits as soon as funding is available. The potential for electrification of short-haul freight service is outside the purview of the Authority's responsibilities and the high-speed rail program. No revisions have been made to the Draft Environmental Impact Report/Environmental Impact Statement in response to this comment.

Los Angeles to Anaheim - RECORD #013735 DETAIL

Status:	Unread
Record Date:	01/26/2026
Interest As:	Business and/or Organization
Full Name:	Corie Lahr

Stakeholder Comments/Issues:

0422 To Whom It May Concern: May you please provide me with the following technical reports contained in the CHSRA Los Angeles to Anaheim Project Section Draft EIR/EIS that are currently not available for download on the website? Transportation Technical Report Draft Relocation Impact Report Sincere thanks, Corie Corie Lahr, CPSM Business Development Manager mobile MARK THOMAS markthomas.com

23.20 Response to Submission 013735 (Corie Lahr, Mark Thomas, Jan 26, 2026)

23.20.1 0422

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 #013765 DETAIL

Status:	Action Pending
Record Date:	01/28/2026
Interest As:	Business and/or Organization
Full Name:	Kevin Brogan

Stakeholder Comments/Issues:

Good morning, Please find the attached letter on behalf of Kevin Brogan. Thank you. Lani A. Nonato | Legal Assistant | Hill, Farrer & Burrill LLP City National Plaza | 515 S. Flower Street, 7th Fl | Los Angeles, CA 90071 Dir: 213.621.0460 ext. 1718 | lnonato@hillfarrer.com | www.hillfarrer.com
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hillfarrer.com

January 28, 2026

VIA E-MAIL (Los.Angeles_Anaheim@hsr.ca.gov)
AND U.S. MAIL

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: Los Angeles to Anaheim Draft EIR/EIS Comment

Ladies and Gentlemen:

0461

This firm represents Golden Springs Development Company, LLC, and SFS Truck Storage, Inc. The entities own several parcels of real property in the City of Santa Fe Springs. The companies' parcels are designated for full or partial acquisition under the draft EIR/EIS being circulated for the Los Angeles to Anaheim segment of the High-Speed Rail Project ("HSR").

In particular, Golden Springs Development Company, LLC owns properties with Assessor's Parcel Numbers (APNs) 8044-001-029, -033 and -034 and 8044-001-035, 8059-005-045 and -046. SFS Truck Storage, Inc. owns APNs 8045-001-034, -026, -006 and -033. These properties have substantial land and building improvements and are leased to third parties which have significant business operations. Among those tenants and business operations are Maersk (Logistics user), Mega Lion, C2C Logistics, and Collision Auto Parts (Logistics user, Logistics user, Auto Parts distributors), Prime Source (Building Products distributions firm), County of Los Angeles, Kenco (Logistics user) and Southern Wine and Spirits (Food and Beverage supplier). Each of these businesses is occupying the various almost new improvements on the site on long term commitments and relying upon the continued ability to remain operating on the site, in the City of Santa Fe Springs, over the long term.

0462

We also want to draw your attention to parcels 8045-001-006 and -033 which, while not identified on the HSR list, operate together with parcels 8045-001-006 and -26 and taking some of the parcels will render all of the parcels unusable for their current purpose. As for the other parcels, identified with partial takings, the impact associated with those could potentially cause all of the associated buildings to fail California's fire codes, because the taking would eliminate required fire lanes, and thus render the entirety of the improvements on those parcels unusable.

0462 The alignment studied in the draft EIR/EIS would result in significant disruption to these users. The draft EIR/EIS creates a cloud over the subject properties that will likely impact uses on the property.

0463 In addition to the potential disruption caused by the potential use of eminent domain to acquire these properties for the HSR, there are issues relating to adjoining property that should be studied before an alignment is considered. Those issues include the existence of a prior landfill site that may make the property not usable for significant rail operations and cause potential health and safety concerns.

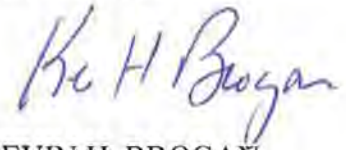
Considering the failures of the EIR to properly assess our properties, we cannot help but question how carefully the EIR was prepared, whether all of its impacts were properly evaluated and whether any realistic economic impacts were considered into its preparation.

0464 Finally, we note that this project is unfunded and unbuildable at present. Given that the HSR construction in the Central Valley is significantly delayed and over budget, it would be difficult to justify to the federal or state government that this portion of the project should proceed without linkage to completed HSR lines.

Any EIR/EIS study should not occur at this time due to the lack of funding and construction timing. The worst outcome would be if the EIR is certified, the acquisition of property begins, tenants are displaced, and the property remains vacant for years, or even decades.

Finally, should the Board approve the draft EIR/EIS now, it would no doubt become stale and need to be re-done when the project is closer to construction.

Very truly yours,



KEVIN H. BROGAN
OF
HILL, FARRER & BURRILL LLP

#3070676v2 O6761 002

23.21 Response to Submission 013765 (Kevin Brogan, Golden Springs Development Company, LLC and SFS Truck Storage, Inc., Jan 28, 2026)

23.21.1 0461

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.

The California High-Speed Rail Authority (Authority) acknowledges the commenter's concerns regarding potential property acquisition and effects on continued operations associated with parcels owned by SFS Truck Storage, Inc. and Golden Springs Development Company, LLC. The project would require a partial acquisition of a portion of the stakeholder's parcels (Assessor's Parcel Numbers [APN] 8044-001-029, 8044-001-033, 8044-001-034, 8044-001-035, 8059-005-045, and 8059-005-046), and full acquisition of some parcels (APNs 8045-001-026 and 8045-001-034). No acquisition is required for APNs 8045-001-006 and 8045-001-033. 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, a partially affected parcel, or a temporary construction easement. The affected area consists primarily of a surface parking lot and enough of the surface lot would remain available for continued use by the businesses on the site. However, a portion of a building would be affected. Various access and configuration issues would need to be addressed and resolved in the future following completion of the environmental review process. These issues include fire access and further coordination among the Authority, the property owner, and the local fire department. Additional information on right-of-way acquisitions can be found in Section 3.12, Socioeconomics and Communities; 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. As described in Section 3.12 of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS), the Authority would incorporate SOCIO-IAMF#3, Relocation Implementation Plan, to 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.

23.21.2 0462

Please refer to the response to comment #0461 above.

23.21.3 0463

The commenter asserts that there are issues related to adjoining property and usability and health and safety concerns associated with construction on a landfill in the vicinity of the Norwalk/Santa Fe Springs Metrolink Station. The commenter appears to be referring to the former Neville Chemical Corporation property in the vicinity of the Norwalk/Santa Fe Springs Metrolink Station area, a portion of which has historically been used as a landfill. This site is discussed in Section 3.10, Hazardous Materials and Wastes, of the Draft EIR/EIS as a site on the Cortese List, along with other potential environmental concern sites. The project includes multiple impact avoidance and minimization features to minimize health and safety hazards and potential impacts related to release of hazardous materials from both known and unknown sites of concern, 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#6, Spill Prevention; HMW-IAMF#9, Environmental Management System; and GEO-IAMF#3, Gas Monitoring. HMW-IAMF#1 requires environmental site assessments to characterize each parcel, and HMW-IAMF#4 provides controls for known, suspected, and unanticipated environmental contamination. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.21.4 0464

Refer to Standard Response LAA-Response-GENERAL-03: Funding and Project Costs, in Chapter 18.

The Los Angeles to Anaheim Project Section (project section) is currently not funded; therefore, the Authority cannot move the project section forward to implementation until funding is secured. Completion of environmental study is an important milestone for major infrastructure projects, however, and is a common prerequisite for funding. Regarding the comment about linkage to completed HSR lines, refer to Section 2.2, Independent Utility, of the Draft EIR/EIS explaining that the project section has independent utility. Project approval and certification of the environmental document do not immediately lead to property acquisitions. As described in Table 2-19 of the Draft EIR/EIS, right-of-way acquisition would occur only upon the Legislature appropriating funding in the annual budget for this purpose. The project would go through more advanced design development, and the Authority would also need to secure permits and construction funding. Section 2.10.3, General Approach, of the Draft EIR/EIS outlines the next steps after completion of the EIR/EIS. The Authority will follow the National Environmental Policy Act and California Environmental Quality Act in determining whether the environmental document needs to be revised because of the passage of time.

Los Angeles to Anaheim - RECORD #013770 DETAIL

Status:	Action Pending
Record Date:	01/28/2026
Interest As:	Business and/or Organization
Full Name:	Bill Maddux

Stakeholder Comments/Issues:

0460

Hi, I was looking to get a copy of the Air Quality and Global Climate Change Technical Report and the Noise and Vibration Technical Report sent to B Maddux, that's , or you can call me back at , as it says to call this number to get an electronic version of the report. Thank you very much.

23.22 Response to Submission 013770 (Bill Maddux, Urban Crossroads, Inc., Jan 28, 2026)

23.22.1 0460

The California High-Speed Rail Authority contacted the commenter on January 28, 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 #013780 DETAIL

Status:	Action Pending
Record Date:	01/30/2026
Interest As:	Business and/or Organization
Full Name:	Derreck Barker

Stakeholder Comments/Issues:

To Whom It May Concern, Please see attached for Nuveen Real Estate's comment letter for the proposed Los Angeles to Anaheim HSR project. If any questions should arise, please feel free to contact me or Sean Davis (cc'd) directly. Thank you. Regards, DERRECK R. BARKER Managing Director U.S. Head of Workplace derreck.barker@nuveen.com Phone: +1 949-809-2628 Nuveen Real Estate 4675 MacArthur Court, Suite 1100 Newport Beach, CA 92660 This message and any attachments may be confidential and proprietary. If you are not an intended recipient, please inform the sender of the transmission error and delete the message immediately without reading, distributing or copying its

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REAL ESTATE

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January 30, 2026

California High-Speed Rail Authority
355 South Grand Avenue
Suite 2050
Los Angeles, California 90071
Los.Angeles_Anaheim@hsr.ca.gov

RE: Los Angeles to Anaheim Draft EIR/EIS Comment
2160 East 7th Street, Los Angeles, California

Dear Board of Directors:

0579 Nuveen Real Estate owns the property located at 2160 East 7th Street (Site), between the Union Pacific Railroad right-of-way to the west and South Mission Road to the east, in the City of Los Angeles (City). The Site is developed with approximately 95,000 square feet of production studio space (7th Street Studios), where television and feature films are recorded. We have reviewed the Los Angeles to Anaheim Project Section Draft Environmental Impact Report / Environmental Impact Study (EIR/EIS) materials for the High-Speed Rail (HSR) System that the California High-Speed Rail Authority made available to the public on December 5, 2025. Based on our review, we are concerned that the Site was not evaluated for potential noise and vibration impacts related to the HSR's construction and operation. Other similar recording studios uses were identified as sensitive receptors and evaluated, but, as demonstrated below, the location of the Site, which is closer to the HSR tracks than the other studios evaluated, suggests that the Site may have different and potentially more significant impacts than these other studio sites. **We request that the Authority revise its analysis to evaluate the Site to determine whether any noise or vibration impacts related to the construction or operation of the HSR will affect the Site.**

The Federal Transit Administration guidelines cited in Draft EIR/EIS Section 3.4-Noise and Vibration provide criteria for special buildings that are "very sensitive to ground-borne noise and vibration," and these are summarized in Draft EIR/EIS Table 3.4-10: *Ground-Borne Vibration and Noise Impact Criteria for Special Buildings*. Importantly, Table 3.4-10 includes impact levels for "TV Studios" and "Recording Studios." While the Draft EIR/EIS identified several studios as sensitive receptors and evaluated potential noise and vibration impacts related to the construction and operation of the HSR, it overlooked the studio use at the Site.

0580 As indicated on Draft EIR/EIS Tables 3.4-17: *Institutional Noise Impact Assessment for the Project Section* and 3.4-19: *Institutional Vibration Impact Assessment for the Project Section*, the following studios located near the east bank of the Los Angeles River in Downtown Los Angeles were evaluated:

1. Monarch Studios (*333 South Mission Road*): 595 feet from northbound track
2. Ace Mission Studios (*516 South Mission Road*): 762 feet from northbound track
3. Downtown Rehearsal (*2155 East 7th Street*): 552 feet from northbound track

Securities offered through Nuveen Securities, LLC

0580

4. Lemon Tree Studios-DTLA (*2185 East 7th Street*): 660 feet from northbound track

The image below demonstrates that the four studios identified in the Draft EIR/EIS and summarized above are located further away from the HSR tracks than the Site, which is labeled with a star. The Site is approximately 400-450 feet from the HSR tracks in both alternatives evaluated in the Draft EIR/EIS.



Though the other studios identified would not have significant impacts, the Site's sensitive receptor status and closer proximity to the HSR project justify the evaluation of the Site for potential noise or vibration impacts during construction and operation. Additionally, as a sensitive receptor, the Site should be

0580 included in the noise-monitoring program required by mitigation measure N&V-MM#1: *Construction Noise Mitigation Measures* as well as N&V-MM#3: *Implement California High-Speed Rail Project Noise Mitigation Guidelines* and N&V-MM#4: *Implement Operational Vibration Mitigation Measures,* if they are applicable following further evaluation of the Site.

Please do not hesitate to contact us if there are any questions about the Site and our request for further evaluation of project impacts.

Regards,



DERRECK R. BARKER
Managing Director
U.S. Head of Workplace

derreck.barker@nuveen.com
Phone: +1 949-809-2628

Securities offered through Nuveen Securities, LLC

23.23 Response to Submission 013780 (Derreck Barker, Nuveen Real Estate, Jan 30, 2026)

23.23.1 0579

Based on the information provided, the studio use at 2160 E Seventh Street meets the definition of a special building that may be particularly sensitive to ground-borne noise and vibration. In response to this comment, the California High-Speed Rail Authority (Authority) reviewed the location and use of the subject property relative to the proposed high-speed rail (HSR) alignment. This review evaluated potential operation-related airborne noise, ground-borne vibration, and ground-borne noise effects in accordance with Federal Transit Administration (FTA) criteria and the methodologies described in Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) Section 3.4, Noise and Vibration. Based on this review, the Final EIR/EIS was revised to include the site as a sensitive receptor in the noise and vibration analysis. Specifically, assessments for this site were included in Table 3.4-17, Table 3.4-19, and Table 3.4-21 of the Final EIR/EIS. The results in these tables indicate that no noise or vibration impacts that exceed applicable thresholds from project operations are anticipated at this site. Refer to Section 16.5.4, Section 3.4: Noise and Vibration, in Chapter 16, Corrections and Additions to the Draft Report, for these revisions.

With respect to potential construction noise or vibration impacts, the Authority notes that site-specific assessments were not conducted for the Draft EIR/EIS, but that such impacts will be analyzed for this site during project design. If the analysis identifies the potential for construction noise or vibration impacts that exceed applicable thresholds, appropriate mitigation measures will be applied consistent with the Authority's standard practices to avoid or reduce such impacts.

23.23.2 0580

The Authority further reviewed the proximity of the site to the proposed HSR alignment under the Shared Passenger Track Alternatives and revised the Final EIR/EIS to include the site as a sensitive receptor in the institutional noise and vibration impact analysis. This evaluation applied the FTA criteria for special buildings, including those applicable to television and recording studios, consistent with Draft EIR/EIS Section 3.4 and Table 3.4-10. Refer to Section 16.5.4 in Chapter 16 for these revisions.

With respect to the commenter's request to include the site in the project's noise-monitoring program, the Authority notes that in accordance with mitigation measure N&V-MM#1 (Construction Noise Mitigation Measures), the contractor will prepare a noise-monitoring program prior to construction that considers all sensitive receptors. The construction noise-monitoring program shall describe how the contractor will monitor construction noise to verify compliance with the applicable noise limits where a noise-sensitive receiver is present. In addition, the noise-monitoring program will describe the noise control mitigation measures required of the contractor to meet the noise limits. The site will be included and considered a sensitive receptor in the noise monitoring program and when evaluating project design per N&V-MM#3 (Implement California High-Speed Rail Project Noise Mitigation Guidelines) and N&V-MM#4 (Implement Operational Vibration Mitigation Measures).

Los Angeles to Anaheim - RECORD #013829 DETAIL

Status:	Action Pending
Record Date:	02/03/2026
Interest As:	Business and/or Organization
Full Name:	John Boslet

Stakeholder Comments/Issues:

See attached comment letter -- John Boslet Boslet Consulting representing the Irvine Company 550 Newport Center Drive | Newport Beach, California | 92660 Phone 949.720.2329 | Fax 949.720.2629 | Cell Phone jboslet@irvinecompany.com Notice to recipient: This e-mail is only meant for the intended recipient of the transmission, and may be a confidential communication or a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying of this e-mail is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message from your system. Thank you in advance for your cooperation.

BOSLET CONSULTING
7 Rippling Stream
Irvine, Ca. 92603
jboslet@irvinecompany.com

Date: February 3, 2026

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

Attn: Los Angeles to Anaheim Draft EIR/EIS Comment

Subject: Los Angeles to Anaheim Draft EIR/EIS Comment

Reference is made to the Los Angeles to Anaheim Project Section Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the California High-Speed Rail (HSR). The Irvine Company (IC) is the owner of the Gateway Apartment Community located in the Cities of Orange and Anaheim near the southeast corner of the State College Boulevard/East Orangewood Ave intersection. The State College Boulevard/East Orangewood Avenue intersection is located within the transportation impact study area as Intersection A-14 as shown in Figure 3.2.1 in the Draft EIR/EIS.

1855 Table 3.2-27 in the Draft EIR/EIS identifies that the intersection of State College/Orangewood is impacted in the PM peak period with increased Anaheim Regional Transportation Intermodal Center (ARTIC) traffic. A projected LOS E is worsened with delays increased from 61.2 to 69.0 seconds. TRAN-MM#2 proposes a mitigation measure to improve LOS and intersection operations during construction and operation of the HSR. The proposed improvement is to convert the eastbound shared through and right turn lane to an exclusive through lane. Appendix 3.2 D provides data as to the mitigation delay decrease that is projected with the proposed improvement. However, no supporting HCM calculation sheets have been provided to show how the reduction in intersection delay has been obtained. For example, why is the delay decrease significantly larger associated with the Norwalk/Santa Fe Springs Station Option in comparison to Alternatives A and B?

1856 Table 3.2-37 provides additional detail on the impacts of all intersection mitigations, including if additional right of way is required. This Table does not describe adding a separate right turn lane to address the removal of the existing permitted right turns or showing any needed street widening at State College Boulevard/East Orangewood

1856 Avenue to provide sufficient width for a separate right turn movement. Therefore, the proposed mitigation measure would eliminate all right turn moves from eastbound Orangewood to southbound State College, presumably by "no right turns allowed" signage.

The impact to residents living in or visiting the Gateway Apartment Community by eliminating the subject right turns at this intersection is of significant concern. Currently this right turn movement on eastbound East Orangewood is used for traffic accessing the primary Gateway Community access on existing State College Boulevard If unable to make the subject right turn, apartment Community traffic would be forced to proceed easterly on East Orangewood, enter the Community at the existing right turn entry on East Orangewood and then take a circuitous route around the neighborhood to get to the main entrance and leasing office.

1857 In addition to our issues regarding impacts on the Gateway Community access, the proposed mitigation measure would also have a significant regional impact. Currently there are significant demands for right turns on eastbound East Orangewood for traffic destined to access the State College/I5 interchange and areas south of I-5. If no right turns are permitted, traffic would be diverted to either the East Orangewood/SR55 interchange or to Orange Center Drive as an alternative route to State College Boulevard. Orange Center Drive was not designed to accommodate the potentially diverted traffic onto this roadway (i.e. speed bumps to discourage speeding and cut-thru traffic)

1858 In our view, the impact on residents and regional traffic would be more impactful than fixing a 7.8 second delay at the State College Boulevard/Orangewood Avenue intersection. Therefore, in conclusion, it is requested that the proposed mitigation be deleted or alternatively consider a modification to the proposed Tran-MM #2 mitigation that would either retain the existing right turn movement or provide an additional right turn lane.

Thank you for your consideration

Sincerely,



John Boslet, Transportation Consultant for the Irvine Company

cc. Jennifer Le, Irvine Company

23.24 Response to Submission 013829 (John Boslet, Irvine Company, Feb 3, 2026)

23.24.1 1855

Appendix 3.2-D, Horizon Year 2040 Post-Mitigation Level of Service, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) summarizes the technical analysis; supporting information such as Highway Capacity Manual calculation sheets are included in the California High-Speed Rail Authority's (Authority) administrative record files and are available on the Authority's website: https://hsr.ca.gov/program-areas/environmental-planning/environmental-documents/project-section-environmental-documents-tier-2/los-angeles-to-anaheim-project-section-environmental-documents/. There are three scenarios considered in the traffic analysis: Shared Passenger Track Alternatives, Shared Passenger Track Alternatives with inclusion of Norwalk/Santa Fe Springs High-Speed Rail (HSR) Station Option, and Shared Passenger Track Alternatives with inclusion of Fullerton HSR Station Option. For the latter two scenarios, inclusion of an HSR station option changes the ridership and mode of access assumptions, because people would shift their trips depending on if an HSR station option is provided. This results in different delays associated with each scenario. Although the State College Boulevard/Orangewood Avenue intersection is in Anaheim, inclusion of the HSR station option in Norwalk/Santa Fe Springs would result in enough of a change in the overall traffic patterns so that there would be a difference in delay compared to the scenario without the HSR station option.

23.24.2 1856

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18, Standard Responses.

The improvements identified by the Authority as necessary for mitigating adverse traffic delay are described in Section 3.2.7, Mitigation Measures, 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, Restripe Intersections, 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, Add Exclusive Turn Lanes to Intersections.

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, Section 3.2: Transportation, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS for these revisions.

23.24.3 1857

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

Refer to response to comment #1856 above.

23.24.4 1858

Refer to Standard Response LAA-Response-Section 3.2 TRAN-02: Design of Traffic Mitigation Measures, in Chapter 18.

Refer to response to comment #1856 above.

Los Angeles to Anaheim - RECORD #013846 DETAIL

Status:	Action Pending
Record Date:	02/03/2026
Interest As:	Business and/or Organization
Full Name:	Teresa Stephens

Stakeholder Comments/Issues:

Attached please find BNSF Railway's Public Comment on Draft EIR/EIS for the Los Angeles to Anaheim Project Section of the California High-Speed Rail System. Teresa Stephens Legal Practice Assistant email website office: 213.626.2906 Oakland • Los Angeles • West Los Angeles • Sacramento • San Diego Confidentiality Notice: This email may contain material that is confidential, privileged and/or attorney work product for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

James Tylick
AVP Passenger Operations

BNSF Railway
2600 Lou Menk Drive
Fort Worth, TX 76131
james.tylick@bnsf.com

February 3, 2026

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

Re: BNSF Railway's Public Comment on Draft EIR/EIS for the Los Angeles to Anaheim Project Section of the California High-Speed Rail System

To Whom It May Concern:

BNSF Railway Company ("BNSF") appreciates the opportunity to submit the following public comments on the draft Environmental Impact Report/Environmental Impact Statement ("EIR/EIS") Los Angeles to Anaheim Project Section of the California High-Speed Rail System ("LA-A Project" or "Project").

3169

1. Withdrawal of former proposed BNSF Colton IMF and Lenwood Staging Tracks Components.

The EIR/EIS at pp. S-8 – S-9 states:

> In 2020, the Authority conducted revised scoping to obtain additional public and agency input for the BNSF Components (Colton Component and Lenwood Component). Early interested party feedback on the BNSF Colton Intermodal Facility Component raised substantial opposition and concern to introducing a new intermodal facility far outside the project corridor. In particular, interested parties in the Inland Empire expressed concerns about the Colton facility's impacts with the added concern that the benefits of HSR and its associated improvements would not reach them.
>
> Responding to these concerns, the Authority considered additional potential alternatives in the 2023 Supplemental Alternatives Analysis Report that would eliminate the need to redirect trains and trucks to a new BNSF intermodal facility in San Bernadino County (Authority 2023a)…. The 2018 HSR Project Alternative and the Shared Passenger Track Alternative were initially deemed the best candidates for further analysis. However, because of concerns related to the Colton Component, only the Shared Passenger Track Alternative was selected for continued evaluation. The Shared Passenger Track Alternative follows the same alignment as the 2018 HSR Project Alternative but excludes the Colton and Lenwood Components, reduces the frequency of HSR service between Los Angeles and Anaheim, and allows freight trains to run on passenger rail tracks.

3169

On pages S9-17, the EIR/EIS further states:

> Outreach continued as part of the 2018 HSR Project Alternative for agencies and cities along the project alignment, as well as agency and city interested parties affected by the BNSF facilities in Colton and Lenwood…. Interested party feedback on the two BNSF Components, received following the Authority's revised scoping in 2020, raised substantial opposition to and concern for introducing a new intermodal facility far outside the project corridor. In addition, *BNSF's support of the 2018 HSR Project Alternative waned*, and it no longer agreed to operate the BNSF Colton Component [Emphasis added].

3169

BNSF appreciates that the EIR/EIS excludes the formerly proposed Colton and Lenwood Components from any of the alternatives evaluated in the EIR/EIS. However, the reasoning given for BNSF withdrawing its willingness to support those Components is not correct. Rather, BNSF was concerned that the underlying assumptions regarding future passenger service levels had changed, and there was no longer a common understanding between BNSF and the Authority regarding the fundamental assumptions regarding this service. In a letter dated October 12, 2022, which is attached and incorporated by reference into this comment, BNSF stated:

> As you also know, BNSF and the Authority entered into a Memorandum of Understanding dated March 15, 2019 ("2019 MOU"), which provides the fundamental assumptions upon which BNSF understood the environmental review for the Project would be based on. Those assumptions include that the Project includes and accommodates the "2030/2040 Consolidated Passenger Service Plan," which has been developed by the California State Transportation Agency ("CalSTA") and the California Department of Transportation, in conjunction with the Authority and the various existing passenger rail service providers in the LA/Fullerton Segment, to increase the volume and frequency of existing passenger rail service and introduce electrified Authority service in the LA/Fullerton Segment, including anticipated growth in passenger rail service beyond what is permitted in existing contracts between BNSF and those passenger rail service providers, and also includes improvements within and outside the LOSSAN Corridor necessary to accommodate the Plan…. However, it has now become apparent that the underlying assumptions regarding future passenger service levels that were the basis of the 2019 MOU have changed, and there is no longer a common understanding regarding the fundamental assumptions regarding this service.
>
> ….we understood that the Authority is working with other passenger operators on a revised service plan for passenger service but we have not seen such revised plan or had the opportunity to evaluate the capital improvements that might be needed to accommodate it. Accordingly, as of today, it is unknown what the actual level of passenger service, and the operating parameters for that service, will be, and therefore, it is unknown what physical improvements will be needed to accommodate that service. As a result, it is too speculative to perform an environmental analysis based on assumptions regarding future passenger levels and operating parameters of service that are no longer valid. In the absence of valid assumptions, it would be purely speculative to identify what physical improvements are necessary and ultimately what the Project is….

3169

> After several years, circumstances have evolved such that the fundamental assumptions of the Project itself have been called into question. Until BNSF and the Authority resolve these issues and come to a mutual understanding about the fundamental assumptions of the Project, BNSF cannot proceed with the environmental review based on the current Project description….

BNSF's position has remained unchanged. Although the Colton and Lenwood Components have been eliminated as components of the LA-A Project, any part of the Project that in any way impacts BNSF rail operations are unsupported by substantial evidence unless they are supported by an agreed-upon passenger service plan.

3171

2. The preservation of freight rail infrastructure is not stated as a project objective which is a priority of the Federal Railroad Administration; the Authority must not shift costs.

The preservation of freight operations, maintenance, and dispatch priority is not stated as a project objective. There is no discussion in the purpose, need and objective sections that explains how BNSF will share corridor operations (LOSSAN, Redondo Jct., Fullerton Jct.) with passenger rail without a consolidated and agreed-upon operating plan involving all operators. BNSF highly recommends including explicit language preserving the ability for BNSF to safely and efficiently serve existing and future freight rail customers. The Authority also must commit to not shifting project costs, costs of mitigation, compliance obligations, permitting obligations, etc, to BNSF. Again, without a consolidated and agreed-upon operating plan, the need and objectives for the project is speculative.

3172

3. The need for the other modifications to BNSF's rail facilities that are cited are speculative, or are otherwise incorrect or not consistent with BNSF's understanding. These include:

- Page 2-64: The EIS/EIR states "the BNSF Eighth Street Yard storage tracks between First Street and I-10 would be removed and relocated to the new consolidated storage area adjacent to Hobart Yard." BNSF understood this was part of what is called the Malabar Yard Mitigation for Metro Link US project. Please explain the discrepancy.

3173

- Footnote 6, Page 2-7: The EIS/EIR states overhead contact system [OCS] standard wire height would be approximately 17.5 feet but can reach up to 24.5 feet. BNSF understands this height to be measured from the top of rail, which would foul freight train movements from operating on tracks with OCS and conflict with the Shared Passenger Track Alternative. Please explain the discrepancy.

3174

- Chapter 2.8.1 states there will be two HSR trains per hour per direction between Los Angeles and Anaheim. Does this frequency include deadhead/positioning movements as may be required (i.e. will trains overnight at Anaheim or deadhead back and forth to Los Angeles during ramp up/ramp down)? Additional deadhead/positioning movements may trigger additional infrastructure requirements and environmental impact, please explain.

3175

- Chapter 2.6.3.4 describes a light maintenance facility at 26th Street that can stage 36 HSR trainsets. It is unclear how the movements in/out of the facility affect the San Bernardino Subdivision operations and overall train counts.

3176

- Chapter 2.8.2: As discussed in the October 12, 2022 and September 5, 2025 letters from BNSF to California High Speed Rail (both attached hereto as Attachments B and C) given the absence of a consolidated service plan between all passenger operators on the shared corridor, BNSF is uncertain if the proposed infrastructure is sufficient to support the introduction of High Speed Rail and could conflict with party entitlements subject to the 1992 RCTC-ATSF Shared Use Agreement.

3177

- The EIR/EIS states that modifications at Hobart and Commerce require intermittent roadway lane closures and traffic pattern changes during construction. The document also stated that construction of fourth main track and added rail/roadway infrastructure at Redondo & Fullerton Junctions. Although the document mentions coordination with BNSF, it is not clear how these activities will be accomplished when BNSF is not a project proponent and there is no agreed-upon construction plan.

- In addition to the above comments, BNSF also makes the individual comments attached here as Attachment A, which are incorporated here by reference.

3178

4. The Authority must take responsibility for all mitigation involving BNSF facilities, including any related impacts of the mitigation, and mitigation must not interfere with BNSF fright operations.

The EIR/EIS states that storage/staging at Hobart Yard requires a future Health Risk Assessment (HSA) for Diesel Particulate Matter (DPM). However, the document does not describe responsibility for any needed associated mitigation or address any responsibility for any exposure of DPM to sensitive receptors in the vicinity as a result of Project activities. Additionally, the EIR/EIS describes severe vibration impacts affecting 517 residences. The Authority must ensure that any mitigation must not interfere with BNSF freight operations. Similarly, the Authority must take responsibility for legacy contamination uncovered during utility relocation involving BNSF facilities.

Thank you for your attention to this matter.

Sincerely,



James Tylick,
AVP Passenger Operations

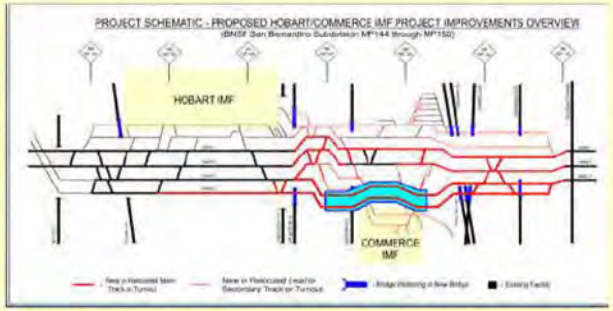
ATTACHMENT A

ADDITIONAL BNSF COMMENTS TO CALIFORNIA HIGH SPEED RAIL AUTHORITY LOS ANGELES TO ANAHEIM PROJECT EIR/EIS

Comment #	Comment Code (pull down)	Subsystem Code (pull down)	Document Type (pull down)	Document Name	Dwg # or Page No	Comment
1	1=Mandatory	SYS	Drawings	LA-A PEPD Vol. 3.1	GE-B0101 and all Track Drawings	Clarify BNSF Usage. Provide details of proposed operations and daily usage. Will BNSF be able to dispatch a move along or across the CAHSR/Metrolink tracks at any time during the day? Will BNSF only use the shared SCRRA/HSR tracks during emergencies? Or will this be available for use at predefined times at night (outside of Metrolink Hours)? GE-B0101, Note 12: "...Freight Operators will ..... be allowed to utilize the two electrified tracks at defined times or in case of emergencies."
2	1=Mandatory	SYS	Drawings	LA-A PEPD Vol. 3.1 LAA_EIR-EIS Technical Reports	General	Clarify Status of Overhead Catenary System (OCS): In previous discussions, the Designer stated that CHSR does not plan to use OCS from LA to Anaheim, since the CHSRA trains will be using battery packs. Current Reports state that the project will use and electrify two tracks in most of the corridor. Please Clarify if OCS will be used, proposed clearance (25' ATR ?), if freight can only operate when power is deactivate, and when/where freight will be allowed to operate.
3	1=Mandatory	SYS		General	General	Who will dispatch the two tracks designated to CAHRS/Metrolink primary use. Will BNSF dispatch the portion within BNSF Subdivision? Or will the two tracks be dispatched by SCRRA (or CHSRA)?
4	1=Mandatory	INF	Drawings	General	General	BNSF and UPRR use the "San Pedro Sub Connector" at-grade across the proposed CHSR/Metrolink tracks several times a day and BNSF needs to cross in several other locations during the day, how will this work.
5	1=Mandatory	INF	Drawings	General	General	Confirm that Commerce Flyover is designed for Cooper E-80 Loading. (this bridge type is not normally designed for E-80, but can be). Confirm the Commerce Flyover has acceptable grades on east and west approaches for freight rail traffic. Confirm that freight rail traffic can operate under existing transmission utility lines
6	1=Mandatory	INF	Drawings	General	General	Will the taller freight cars (such as double-stack be allowed to operate along the electrified tracks if required? In the LA-Anaheim segment (a regular speed segment shared with both commuter and freight), what is the CHSRA requirement or Project Basis of Design for vertical clearance to from railcars to the proposed conductors? What is the CHSRA requirement (or Project Basis of Design) for from minimum clearance to from bridge soffit to conductors?

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ADDITIONAL BNSF COMMENTS TO CALIFORNIA HIGH SPEED RAIL AUTHORITY LOS ANGELES TO ANAHEIM PROJECT EIR/EIS

Comment #	Comment Code (pull down)	Subsystem Code (pull down)	Document Type (pull down)	Document Name	Dwg # or Page No	Comment
3185						
7	1=Mandatory	INF	General	General	General	Construct ALL new or shifted tracks using 15' track centers unless otherwise approved in writing by BNSF.
3186						
8	1=Mandatory	INF	General	General	General	There are currently only three Main Tracks and One Lead Track at the East end of Hobart Yard. Since the previous 30% Design Submittal for Hobart Yard and Commence Flyover, BNSF has performed additional engineering and operational constraints review at the location in support of grant applications and planning for facility requirements. Locomotives line up along this track every day to enter the Diesel Facility for fueling and service. Container trains also line up to enter Hobart from the East or to move between Commerce and Hobart yards. BNSF has anticipated the need for one additional Main Track across 5-FWY /Telegraph Road / Garfield Avenue, as well as an additional lead track to support HSR rail operations over the existing four current tracks over 5-FWY/Telegraph/Garfield.  BNSF cannot operate using one main track and one lead track on the east side of Hobart/Commerce. At a minimum, CAHSR/Metrolink will need to either only operate CAHSR/Metrolink trains on one main track between the station and flyover or construct and additional Main Track between Commerce Station and Commerce Flyover.
3187						
9	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1502 - D1503	LAUPT Connector STA S159+00 to S175+00 LAUPT to West Bank: No Impacts to BNSF (Station Connector is on new ROW)

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Comment #	Comment Code (pull down)	Subsystem Code (pull down)	Document Type (pull down)	Document Name	Dwg # or Page No	Comment
10	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1503	**SCRRA West Bank MP 140.82 to 141.1 (STA S175+00 to S190+00)** **Only One Main Track along the West Bank** **West Bank - 101 FWY to 1st Street:** There is only one Main Track shown along the West Bank at the 1st street to 101FWY segment and a proposed LinkUS crossover that connects MT2 to the Amtrak Lead and then reconnects to MT2 near the 101 FWY. Will BNSF be using both MT1 and MT2/Amtrak Connector on the West Bank? Will there only be one track provided to BNSF within this segment?
11	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1504 - D1509	**SCRRA West Bank MP 142.45 to 142.75 (STA S263+50 to S275+58)** **West Bank - 10 FWY to Olympic Blvd** There are three tracks in this area (adjacent to 8th Street Yard), two HSR/SCRRA tracks and one Amtrak Lead. The HSR/SCRRA tracks are electrified. Will BNSF use these tracks or is BNSF no longer allowed access through the West Bank?
12	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1509 - D1514	**SCRRA West Bank MP 142.75 to 143.8 (STA 136+32 to 190+00)** **Olympic Blvd to Begin BNSF San Bernardino Subdivision** No impacts to BNSF (this is the Redondo Flyover segment)
13	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1514 - D1516	**MP 142.75 to 144.4 (STA 190+00 to 215+00)** **Redondo Flyover to CP Soto (Main Tracks)** Main Tracks OK, they have been replaced in kind and are consistent Hobart Yard requirements.
14	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1514 - D1516	**MP 142.75 to 144.4 (STA 190+00 to 215+00)** **Redondo Flyover to CP Soto (Industrial leads and spur tracks)** BNSF needs to access the industry tracks on the south side of the ROW by using and crossing the CAHSR tracks. Per previous comments re BNSF use, clarify when and how BNSF will be allowed to use the HSR/Metrolink Tracks.
15	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1516 - D1517	**MP 144.4 to 144.7 (STA 215+00 to 230+00)** **Hobart West Leads (Main Tracks, Leads, and Downey Br.)** OK. This is consistent with previous 30pct and Exec. Book New E. Lead serving Hobart HSR Tracks on south side of ROW

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Comment #	Comment Code (pull down)	Subsystem Code (pull down)	Document Type (pull down)	Document Name	Dwg # or Page No	Comment
16	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1517	**MP 144.4 to 144.7 (STA 215+00 to 230+00)** **Hobart West Leads (Leads)** Minor Comment: Next submittal, show how New Lead/UPRR Transfer Track ties into inbound lead. Will this track only provide access to the north half of the Yard (105, 106, 107, 108, and engine tracks TRK1 and TRK2)?
17	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1516	R value for proposed vertical curve at STA 216+51.52 is 0.19. BNSF maximum R value for a sag vertical curve is 0.05.
18	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1516	The vertical clearance for the proposed bridge should be 16'-6" for steel superstructure. Vertical clearance less than 16'-6" will require a sacrificial beam.
19	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1517 - D1524	**MP 144.7 to 146.5 (STA 230+00 to 328+00)** **Hobart Yard -BNSF New Yard Tracks** OK. No Comments. This is consistent with previous 30pct and Exec. Book.
20	2=Recommended	INF	Drawings	LA-A PEPD Vol. 3.1	D1517 - D1524	**MP 144.7 to 146.5 (STA 230+00 to 328+00)** **Hobart Yard - Main Tracks** All of the yard expansion and the south half of Hobart Yard (101 through 105) depend entirely on a single lead track (EX. BNSF LEAD). Would it make sense to add alternate access at each end to provide for broken trackwork/emergencies/maintenance? It could be a crossover from BNSF M1 to either the middle or southernmost yard expansion track at each end of the new yard.
21	2=Recommended	INF	Drawings	LA-A PEPD Vol. 3.1	D1517 - D1524	**MP 144.7 to 146.5 (STA 230+00 to 328+00)** **Hobart Yard - UPRR Connector** It looks like UPRR and BNSF will access the UPRR San Pedro Sub Connector by crossover from BNSF M2 to LA-A NB to LA-A SB to UPRR Connector, correct? BNSF uses this several times per day to get to J Yard. Will BNSF be able to freely dispatch through this route?
22	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1518	R value for proposed vertical curve at STA 235+55.00 is 0.15. BNSF maximum R value for a crest vertical curve is 0.10.
23	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1520	R value for proposed vertical curve at STA 274+06.63 is 0.18. BNSF maximum R value for a sag vertical curve is 0.05.

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3202 24	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1524	R value for proposed vertical curve at STA 320+29.97 is 0.40. BNSF maximum R value for a sag vertical curve is 0.05.
3203 25	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1524 - D1525	**MP 146.5 to 146.6 (STA 328+00 to 335+00)** **IMF Throat at Atlantic Blvd Br.** OK. Similar to previous 30pct configuration.
3204 26	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1525	R value for proposed vertical curve at STA 330+91.16 is 0.18. BNSF maximum R value for a crest vertical curve is 0.10.
3205 27	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1525	The vertical clearance for the proposed bridge should be 16'-6" for steel superstructure. Vertical clearance less than 16'-6" will require a sacrificial beam.
3206 28	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1526 - D1531	**MP 146.6 to 148.0 (STA 335+00 to 410+00)** **IMF to Diesel Facility** OK. Similar to previous 30pct configuration. **(2 Lead, 2 BNSF, 2 Staging, 2 HSR & Flyover)**
3207 29	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1531 - D1533	**MP 146.6 to 148.0 (STA 335+00 to 410+00)** **IMF to Diesel Facility** Next Submittal, confirm horizontal clearances to columns at the two yard connectors that cross under the flyover.
3208 30	2=Recommended	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1526	Recommend relocating the proposed RH turnout near SBY STA. 350+00 to the railroad west to create a ladder with the proposed turnout on BNSF Main 2 (Relocated turnout would become a LH turnout). This will lengthen the yard tracks capacity. and reduce the number of horizontal curves.
3209 31	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1526 & TT-D1527	R value for proposed vertical curve at STA 351+95.00 is 0.34. BNSF maximum R value for a sag vertical curve is 0.05.
3210 32	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1527	Proposed grade of 2.0% exceeds the BNSF standard of 1.0% grade
3211 33	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1527 & TT-D1528	R value for proposed vertical curve at STA 364+089.04 is 0.33. BNSF maximum R value for a crest vertical curve is 0.10.
3212 34	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1528	The vertical clearance for the proposed bridge should be 17'-6" for concrete superstructure. Vertical clearance less than 17'-6" will require a sacrificial beam.

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Comment #	Comment Code (pull down)	Subsystem Code (pull down)	Document Type (pull down)	Document Name	Dwg # or Page No	Comment
3213 35	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1528	What are the horizontal clearances between the centerlines of proposed yard tracks to the proposed aerial structure columns near STA. 372+70?
3214 36	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1530	R value for proposed vertical curve at STA 405+00.25 is 0.35. BNSF maximum R value for a sag vertical curve is 0.05.
3215 37	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1531	What are the horizontal clearances between the centerline of the proposed yard track to the proposed aerial structure columns near STA. 409+50 and STA. 417+00?
3216 38	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1531 - D1533	**MP 148.0 to 148.5 (STA 410+00 to 430+00)** **Adjacent to Diesel Facility** OK. Similar to previous 30pct configuration.
3217 39	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1531 & TT-D1532	R value for proposed vertical curve at STA 417+83.91 is 0.34. BNSF maximum R value for a crest vertical curve is 0.10.
3218 40	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1532	Proposed -2.5% grade exceeds BNSF standard grade of 1.0%
3219 41	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1533 - D1536	**MP 148.5 to 14 (STA 430+00 to 482+00)** **CP Commerce to Greenwood Avenue** Reduce CHSR/Metrolink to one main track or provide additional tracks across 5-FWY /Telegraph Road / Garfield Avenue and extend the siding to Greenwood Avenue. Under the current design BNSF is reduced to one main track from Atlantic to Greenwood. The northernmost track from STA 425+00 to STA 482+00 is the existing East Lead & Staging Track (Staging 7667-5500) not BNSF MT1. Locomotives line up along this track every day to enter the Diesel Facility and to allow locomotives to exist the facility for fueling, service, and/or maintenance.
3220 42	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1533 - D1536	**MP 148.5 to 149.46 (STA 430+00 to 482+00)** **CP Commerce to Greenwood Avenue** Siding/Staging Track 7600-5100 is removed to allow for relocated Metrolink Station. How will this be mitigated? part of the mitigation provided by the Hobart Yard Improvements?
3221 43	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1533 - D1536	**MP 148.5 to 149.46 (STA 430+00 to 482+00)** **CP Commerce to Greenwood Avenue** Industrial Lead Track 7600-5105 is permanently removed from service. This should be identified in the agreement with BNSF

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Comment #	Comment Code (pull down)	Subsystem Code (pull down)	Document Type (pull down)	Document Name	Dwg # or Page No	Comment
3222	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1532 & TT-D1532	R value for proposed vertical curve at STA 431+21.38 is 0.34. BNSF maximum R value for a sag vertical curve is 0.05.
3223	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1533	The vertical clearance for the proposed through plate girder (With bolted bottom flange) bridge should be 17'-6". Vertical clearance less than 17'-6" may require a sacrificial beam.
3224	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1533	R value for proposed vertical curve at STA 441+71.04 is 0.19. BNSF maximum R value for a crest vertical curve is 0.10.
3225	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1533	The vertical clearance for the proposed through plate girder (With bolted bottom flange) bridge should be 17'-6". Vertical clearance less than 17'-6" may require a sacrificial beam.
3226	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1535	R value for proposed vertical curve at STA 460+80.95 is 0.19. BNSF maximum R value for a sag vertical curve is 0.05.
3227	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1536	R value for proposed vertical curve at STA 478+07.06 is 0.18. BNSF maximum R value for a crest vertical curve is 0.10.
3228	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1536 - D1538	**MP 149.5 to 149.8 (STA 482+00 to 508+00)** **Greenwood Avenue to CP Bandini** Industrial Lead Tracks 7600-5133 and 7600-5150 are permanently removed from service. Requires discussion with BNSF. This should be identified in the agreement with BNSF
3229	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1537	R value for proposed vertical curve at STA 486+36.72 is 0.18. BNSF maximum R value for a crest vertical curve is 0.10.
3230	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1538 - D1539	**MP 149.8 to 150.1 (STA 508+00 to 519+00)** **Rio Hondo Bridge** Changed to new single track bridge and shifted tie-in location of Pico Rivera Yard Track further to the east in order to avoid double track bridge over river and reduce the length of the extension of the pedestrian underpass culvert/tunnel. Requires BNSF Approval for turnout on bridge.
3231	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1539	Proposed turnout located on proposed bridge spanning Rio Hondo. Previous version had turnout located to railroad west with proposed two track bridge. Relocate the proposed turnout shown on the proposed through plate girder bridge.

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	Comment #	Comment Code (pull down)	Subsystem Code (pull down)	Document Type (pull down)	Document Name	Dwg # or Page No	Comment
3232	54	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1539 - D1543	**MP 150.1 to 150.9 (STA 519+00 to 570+00)** **Pico Rivera Yard (Rio Hondo Br. to CP Serapis)** Two Yard Tracks (7660-5601 and 5602) are eliminated to provide for New BNSF MT1 and make space for OHP Poles. This is consistent with previous design, but Where is this mitigated?
3233	55	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1540	R value for proposed vertical curve at STA 529+57.90 is 0.18. BNSF maximum R value for a sag vertical curve is 0.05.
3234	56	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1540	**MP 150.4 (STA 534+00)** **Paramount Blvd Bridge** No Comments. Similar to previous design.
3235	57	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1541	R value for proposed vertical curve at STA 547+67.53 is 0.14. BNSF maximum R value for a crest vertical curve is 0.10.
3236	58	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1539 - D1543	**MP 150.1 to 150.9 (STA 519+00 to 570+00)** **Pico Rivera Yard (Rio Hondo Br. to CP Serapis)** Staging/Yard Track 7660-5602 (the one next to new MT1) is removed. It looks like there is clearance for some or most of this track to can still be used (especially from Paramount Blvd to the east). Does all of the track need to be removed.
3237	59	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1542	The vertical clearance for the proposed through plate girder (With bolted bottom flange) bridge should be 17'-6". Vertical clearance less than 17'-6" will require a sacrificial beam.
3238	60	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1542	**MP 150.91 (STA 561+00)** **Rosemead Blvd Bridge** No Comments. Similar to previous design.
3239	61	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1543	R value for proposed vertical curve at STA 565+71.78 is 0.17. BNSF maximum R value for a sag vertical curve is 0.05.
3240	62	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1548	The vertical clearance for the proposed bridge should be 17'-6" for concrete superstructure. Vertical clearance less than 17'-6" will require a sacrificial beam.
3241	63	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1548	R value for proposed vertical curve at STA 637+57.55 is 0.15. BNSF maximum R value for a crest vertical curve is 0.10.
3242	64	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1549	R value for proposed vertical curve at STA 648+18.16 is 0.13. BNSF maximum R value for a sag vertical curve is 0.05.

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3243	65	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1550	R value for proposed vertical curve at STA 664+02.72 is 0.20. BNSF maximum R value for a sag vertical curve is 0.05.
3244	66	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1551	The vertical clearance for the proposed steel superstructure bridge should be 16'-6". Vertical clearance less than 16'-6" will require a sacrificial beam.
3245	67	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1551 & TT-D1552	R value for proposed vertical curve at STA 678+36.07 is 0.19. BNSF maximum R value for a crest vertical curve is 0.10.
3246	68	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1552	The vertical clearance for the proposed concrete superstructure bridge should be 17'-6". Vertical clearance less than 17'-6" will require a sacrificial beam.
3247	69	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1553	R value for proposed vertical curve at STA 693+88.10 is 0.18. BNSF maximum R value for a sag vertical curve is 0.05.
3248	70	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1554	R value for proposed vertical curve at STA 705+84.54 is 0.18. BNSF maximum R value for a crest vertical curve is 0.10.
3249	71	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1555	The vertical clearance for the proposed concrete superstructure bridge should be 17'-6". Vertical clearance less than 17'-6" will require a sacrificial beam.
3250	72	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1555	R value for proposed vertical curve at STA 725+28.09 is 0.18. BNSF maximum R value for a crest vertical curve is 0.10.
3251	73	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1556	**MP 150.91 to 154.7 (STA 570+00 to 760+00)** **CP Serapis to east of Telegraph Rd. (Pico Yard to Begin Flyover #2)** Minor change is not significant. MT4/M3 Xover Moved from MP 153.6 to MP 154.28 (STA 737+60 near Telegraph Rd)
3252	74	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1556	Proposed crossover located too close to existing BNSF cantilever signal. Move proposed point of switch (STA. 742+48) 60' away from existing signal to the railroad west.
3253	75	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1556	R value for proposed vertical curve at STA 743+86.25 is 0.18. BNSF maximum R value for a sag vertical curve is 0.05.
3254	76	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1557	The vertical clearance for the proposed concrete superstructure bridge should be 17'-6". Vertical clearance less than 17'-6" will require a sacrificial beam.

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3255 77	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1557	Proposed point of switch too close to end of proposed bridge. Recommend moving towards the railroad east away from structure STA. 746+96.
3256 78	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1543 - D1557	**MP 150.91 to 154.7 (STA 570+00 to 760+00)** **CP Serapis to east of Telegraph Rd. (Pico Yard to Begin Flyover #2)** No other comments from C.Coffman. No other Significant Changes: Exist 3MT Segment Converted to 2 BNSF MT and 2 SCRRA/HSR M.
3257 79	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1558 - D1568	**MP 154.7 to Station Parking Area to MP 157.25 (STA 760+00 to 893+00)** **Flyover #2 (east of Telegraph Rd. to Norwalk Station to Carmenita Rd.)** Next Submittal, provide profile information for BNSF MT profile for approach to Carmenita RD. (approx. STA 876+50 to 888+70).
3258 80	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1557 & TT-D1558	R value for proposed vertical curve at STA 761+98.14 is 0.18. BNSF maximum R value for a sag vertical curve is 0.05.
3259 81	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1560	R value for proposed vertical curve at STA 789+72.47 is 0.18. BNSF maximum R value for a crest vertical curve is 0.10.
3260 82	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1561	R value for proposed vertical curve at STA 806+50.69 is 0.29. BNSF maximum R value for a crest vertical curve is 0.10.
3261 83	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1561 & TT-D1562	Proposed grade of -1.877% exceeds BNSF standard maximum grade of 1.0%
3262 84	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1562 & TT-D1563	R value for proposed vertical curve at STA 827+52.73 is 0.29. BNSF maximum R value for a sag vertical curve is 0.05.
3263 85	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1565	R value for proposed vertical curve at STA 860+17.39 is 0.29. BNSF maximum R value for a crest vertical curve is 0.10.
3264 86	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1565 & TT-D1566	Proposed grade of -1.960% exceeds BNSF standard maximum grade of 1.0%
3265 87	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1567	R value for proposed vertical curve at STA 884+27.33 is 0.29. BNSF maximum R value for a sag vertical curve is 0.05.
3266 88	2=Recommended	INF	Drawings	LA-A PEPD Vol. 3.1	D1558 - D1568	**MP 154.7 to Station Parking Area to MP 157.25 (STA 760+00 to 888+70)** **Flyover #2 (east of Telegraph Rd. to Norwalk Station to Carmenita Rd.)** Recommend Discussion a the design comment review meeting to go over reason for turnouts/configuration for BNSF MT1 MT 2 MT3 between the station and Carmenita. (Sta 875+59 to STA 893+00). BNSF Operations will need to review and approve the configuration.

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3267	89	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1567	Proposed crossover shown located over existing Carmenita Bridge. Relocate proposed crossover away from bridge. STA. 888+87
3268	90	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1567	The vertical clearance for the proposed concrete superstructure bridge should be 17'-6". Vertical clearance less than 17'-6" will require a sacrificial beam.
3269	91	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	D1568 - D1570	**MP 157.25 to 157.8 (STA 893+00 to 922+00)** **Carmenita to Rosecrans/Marquard:** Include the two right hand crossovers in this segment in the crossover/configuration discussion recommended above.
3270	92	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1568	R value for proposed vertical curve at STA 898+64.94 is 0.17. BNSF maximum R value for a sag vertical curve is 0.05.
3271	93	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1569	Proposed crossovers shown located over existing Coyote Creek Bridge. Relocate proposed crossovers away from bridge.
3272	94	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1569	R value for proposed vertical curve at STA 914+73.54 is 0.18. BNSF maximum R value for a sag vertical curve is 0.05.
3273	95	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1570 - D1573	**MP 157.8 to 158.5 (STA 922+00 to 959+40)** **Rosecrans/Marquard to Valley View:** **No Comments from C.Coffman - Design is similar to previous 30pct submittal**
3274	96	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1573	The vertical clearance for the proposed bridge should be 16'-6" for steel superstructure. Vertical clearance less than 16'-6" will require a sacrificial beam.
3275	97	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1573 - D1578	**MP 158.5 to 159.6 (STA 959+40 to 1017+48)** **Reduced Phasing and Staging Flexibility** **Valley View to Alondra:** The S/B Xover near Valley View that connects MT4 to the center portion of the yard has been DELETED. Rosecrans Turnout is now the only access to the west end of the lead. Put the Crossover back into the design. Restore/relocate the RH Crossover so that it connects MT4 to the BNSF Yard Lead
3276	98	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1574 & TT-D1575	R value for proposed vertical curve at STA 977+68.46 is 0.18. BNSF maximum R value for a crest vertical curve is 0.10.

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3277 99	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1577 & TT-D1578	R value for proposed vertical curve at STA 1015+81.85 is 0.19. BNSF maximum R value for a sag vertical curve is 0.05.
3278 100	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1578 - D1581	**MP 159.6 to 160.5 (STA 1017+48 to 1065+00)** **Reduced Safety Buffer for less than 15' track center between HST and Freight tracks and for new track construction** **Alondra to Beach (Main Tracks):** less than 15 foot track centers in some sections of new track and in some section between HSR and freight. Construct all new or shifted tracks using 15' track centers unless otherwise approved in writing by BNSF.
3279 101	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1578	Proposed turnout located within limits of vertical curve
3280 102	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1578 - D1580	**MP 159.6 to 160.5 (STA 1017+48 to 1065+00)** **E. La Mirada Yard:** No Significant Changes impacting BNSF for E. La Mirada Yard
3281 103	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1580	R value for proposed vertical curve at STA 1047+64.11 is 0.19. BNSF maximum R value for a crest vertical curve is 0.10.
3282 104	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1581	R value for proposed vertical curve at STA 1058+39.78 is 0.16. BNSF maximum R value for a sag vertical curve is 0.05.
3283 105	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	D1581	**MP 160.4 (STA 1059+72)** **Buena Park Station Alternative:** No Significant Changes impacting BNSF for Buena Park Station Relocation
3284 106	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1581	**MP 160.5 to (STA 1065+00)** **Bridge Configuration at Beach Blvd Bridge** **Design Exception Required** Beach Blvd Bridge Design Exception will be required for 15.5' clearance between Bridge Soffit and Roadway.
3285 107	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1581 - D1584	**MP 160.5 to 161.2 (STA 1065+00 to 1101+96)** **Beach to OLD Buena Park Station:** No Significant Changes to Track
3286 108	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1581	The vertical clearance for the proposed concrete superstructure bridge should be 17'-6". Vertical clearance less than 17'-6" will require a sacrificial beam.
3287 109	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1583	**MP 160.9 (STA 1086+12)** **Brea Creek Culvert Widening:** No Significant Changes

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110	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1583	R value for proposed vertical curve at STA 1089+97.05 is 0.07. BNSF maximum R value for a sag vertical curve is 0.05.
111	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1584	**MP 161.2 (STA 1101+96)** **(Existing) Buena Park Station Removal:** No Significant Changes
112	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1584 - D1591	**MP 161.2 to 161.2-163.0 (STA 1101+96 to 1197+00)** **Examine Configuration** **Buena Park Station to Basta (Tracks):** Crossovers/configuration reshuffled. Recommend discuss this at the design comment review meeting. BNSF Operations will need to review and approve the configuration. Also, Examine Moving MT3/MT2 LHXO from STA 1104+50 to STA 1110+75
113	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1584	**MP 161.3 (STA 1107+24)** **Design Exception Required** **Dale St. Bridge** Design Exception will be required for 15.5' clearance between Bridge Soffit and Roadway.
114	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1584	The vertical clearance for the proposed concrete superstructure bridge should be 17'-6". Vertical clearance less than 17'-6" will require a sacrificial beam.
115	3=Information (no response required)	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1584 - D1591	**MP 161.2 to 163 (STA 1101+96 to 1197+00)** **HSR Trench Underpass** Buena Park to Basta (HSR Trench/Underpass): No Significant Changes impacting BNSF to the Trench Underpass
116	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1591 - D1598	**MP 163 to 164.7 (STA 1197+00 to 1286+76)** **Basta to Highland (Tracks):** Tracks repurposed and Crossovers/configuration reshuffled. Recommend discuss this at the design comment review meeting. BNSF Operations will need to review and approve the configuration.
117	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1591 - D1598	**MP 163 to 164.7 (STA 1197+00 to 1286+76)** **Reduced Phasing and Staging Capacity** **Basta to Highland (Tracks):** Storage/Staging Capacity removed and not replaced Mitigate loss at another location (possibly a 2nd storage track approx. STA 1225+00 to 1245+00 ?)

3288 3289 3290 3291 3292 3293 3294 3295

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3296	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1598	The vertical clearance for the proposed concrete superstructure bridge should be 17'-6". Vertical clearance less than 17'-6" will require a sacrificial beam.
3297	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1598 - D1599	**MP 164.7 to 165 (STA 1286+76 to 1303+01)** **Fullerton Station:** Station configuration revised and Reduced from 5 Main Tracks in Previous 30pct design to 4 Main Tracks in current 30pct design
3298	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1598	R value for proposed vertical curve at STA 1286+82.13 is 0.09. BNSF maximum R value for a sag vertical curve is 0.05.
3299	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1598	R value for proposed vertical curve at STA 1291+02.13 is 0.34. BNSF maximum R value for a crest vertical curve is 0.10.
3300	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1599	The vertical clearance for the proposed concrete superstructure bridge should be 17'-6". Vertical clearance less than 17'-6" will require a sacrificial beam.
3301	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1599 - D1600	**MP 165 to 165.3 (STA 1303+01 to 1320+00)** **Examine Configuration** Fullerton Station to Fullerton JCT: Configuration reshuffled. Need a Crossover from MT2 to MT3 so that MT3 can be used on the San Bernardino Sub.
3302	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1600	R value for proposed vertical curve at STA 1308+00.00 is 0.14. BNSF maximum R value for a crest vertical curve is 0.10.
3303	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1600	R value for proposed vertical curve at STA 1311+78.54 is 0.12. BNSF maximum R value for a sag vertical curve is 0.05.
3304	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1600	R value for proposed vertical curve at STA 1315+88.14 is 0.12. BNSF maximum R value for a sag vertical curve is 0.05.
3305	1=Mandatory	INF	Drawings	LA-A PEPD Vol. 3.1	TT-D1600 - D1601	**MP 165.3 to 165.6 (STA 1320+00 to 1333+00)** **Fullerton JCT:** Designer to confirm that daily Freight operations can continue on Orange Subdivision on SCRRA M1 and SCRRA M2
3306	2=Recommended	GEN=General	Drawings	Volume 3.1	General	It is challenging to determine the impact to BNSF of the proposed alignment configuration without a more defined operating plan. BNSF must retain access to all tracks, including aerial structures to ensure the ability to continue moving trains efficiently. A more defined operating plan is requested.

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129	1=Mandatory	GEN=General	Drawings	Volume 3.1	General	Design presents significantly more infrastructure that will present a lot more maintenance requirements. The additional resources needed to address this and the associated ongoing maintenance cost needs to be defined. Who is the responsible party for on-going maintenance?
130	1=Mandatory	INF=Infrastructure	Drawings	Volume 3.1	Page 73	Access to industry leads appears limited if they are expected to remain in service. Clarification is needed on how businesses will continue to be served efficiently if leads are to be located off the passenger tracks.
131	2=Recommended	INF=Infrastructure		Volume 3.1	Page 159	If not already considered existing, there should be a RH crossover between MT3 and MT2 east of Fullerton Junction to reduce conflicts with trains coming off the Orange Subdivision. Coordinate with Metrolink and BNSF on current track configurations/engineering plans for Fullerton Interlocker and Raymond-to-Esperanza 3MT
132	1=Mandatory	GEN	RPT	LAA_EIR-EIS_03.02 Transportation-508	3.2-120	**Impact TR-15** Clarify description of the proposed track usage. Is this stating that Two Tracks would be used solely by BNSF and BNSF would also be provided "equivalent to one train per hour per direction" on the other two tracks? Or is this saying they that Two Tracks would be used solely by BNSF, CHSR would be provided "equivalent to one train per hour per direction" on the other two tracks shared with SCRRA, and it is implied that BNSF would not normally use those two tracks?
133	1=Mandatory	SYS	RPT	LAA_EIR-EIS_ Appendix02-E	14	**Operations Control Center** Who will Dispatch and Control the Two Main Tracks designated for BNSF use From Redondo Junction to Fullerton (the CHSR LA-A portion that is on the BNSF San Bernarding Subdivision)?:
134	1=Mandatory	SYS	RPT	LAA_EIR-EIS_ Appendix02-E	14	**Operations Control Center** Who will Dispatch and Control the Two Main Tracks designated SCRRA and HSR use From Redondo Junction to Fullerton (the CHSR LA-A portion that is on the BNSF San Bernarding Subdivision)?:
135	1=Mandatory	GEN=General	Drawings	LA-A PEPD Vol. 3.1	GE-B0101	**Note 14 DIAMOND (AT-GRADE) CROSSINGS** clarify note. is this supposed to say "where operating speeds allow" and should this be moved to after where it says "as shown on the Plans".
136	1=Mandatory	GEN=General	Drawings	LA-A PEPD Vol. 3.1	GE-B0101	**DIAMOND (AT-GRADE) CROSSINGS** All diamonds shall be coordinated with freight rail owners to meet design requirements

3307 3308 3309 3310 3311 3312 3313 3314

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137	1=Mandatory	INF=Infrastructure	Drawings	LA-A PEPD Vol. 3.1	TT-D1532 TT-D1533	The Track Identified as EX. BNSF MT-1 operates as a lead track. Locomotives line up along this track every day to enter the Diesel Facility for fueling and service. Container trains also line up to enter Hobart from the East or to move between Commerce and Hobart yards. If a (fifth) track cannot be added across the I-5 FWY and the other bridges to replace the lead per comment #8, then BNSF will need to use M3/LAA-NB for BNSF Freight eastbound traffic form STA 437+00 to 504+00 . Please add right-hand crossovers from M1 to M2 and from M2 to M3 just before the west side of the I5 FWY bridge. BNSF will use these crossover and the crossovers proposed at STA 504+00 to use M2 and M3 as the BNSF primary tracks during the daytime peak hours for container traffic and locomotive fueling.
138	3=Information (no response required)	INF=Infrastructure	Drawings	LA-A PEPD Vol. 3.1	TT-D1543	MOW Spur has been restored in this submittal
139	1=Mandatory	INF=Infrastructure	Drawings	LA-A PEPD Vol. 3.1	TT-D1592 TT-D1593	Previously added MOW Spur East of Commonwealth (STA 1206+50 to STA 1215+00) Why was this deleted? What did it previously mitigate?
140	3=Information (no response required)	INF=Infrastructure	Drawings	LA-A PEPD Vol. 3.1	TT-D1600	450' MOW Spur for BNSF use has been added at the location of rail museum lead in this submittal
141	1=Mandatory	SYS	Drawings	LA-A PEPD Vol. 3.1	Track Drawings	Clarify access points for rail Maintenane and confirm that all segment are provided access prior to next submittal. Cross-check with proposed ROW limits and Project Footprint. If ROW acquisitiuon is required outside of the footprint shown in the EIR, it will more difficult to accomplish. Provide width for a continuous access road along the ROW the entire length along the San Bernardino Subdivision from LinkUS to Fullerton.
142	1=Mandatory	SYS	Drawings	LA-A PEPD Vol. 3.1	Track Drawings	Clarify how track Maintenance will be performed in areas with four tracks. Verify if additional spacing between MT2 and MT4 to provide for maintanance access between these two tracks is required.
143	1=Mandatory	SYS	Drawings	LA-A PEPD Vol. 3.1	Track Drawings	Clarify location of signal houses and HSR OCS power equipments locations prior to next submittal. Cross-check with proposed ROW limits and Project Footprint. If ROW acquisitiuon is required outside of the footprint shown in the EIR, it will more difficult to accomplish.

3315 3316 3317 3318 3319 3320 3321

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Comment #	Comment Code (pull down)	Subsystem Code (pull down)	Document Type (pull down)	Document Name	Dwg # or Page No	Comment
144	1=Mandatory	ROW	General	General	General	Confirm with BNSF corridor wide needs for additional ROW beyond limits of currently proposed environmental footprint (APE). More specifically, east of BNSF's Hobart Yard additional ROW needs may be required to support the Commerce Flyover footprint (including additional room for TCEs). Additionally, east of BNSF's Hobart Yard additional ROW needs may be required to support utility relocations associated with the Commerce Flyover and mtiigations thereof

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ATTACHMENT B

James Tylick
AVP Passenger Operations

BNSF Railway
2600 Lou Menk Drive
Fort Worth, TX 76131
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October 12, 2022

VIA EMAIL

Mr. Bruce Armistead
Director of Operations and Maintenance
California High Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

Dear Mr. Armistead:

BNSF has been a collaborative partner with California High Speed Rail Authority as evidenced by the progress made in Central California. I am writing today to reiterate concerns BNSF has communicated regarding the Authority's Project from Los Angeles to Anaheim ("LA-A"). As has been discussed, BNSF's concern is that the fundamental assumptions underlying the LA-A Project Section have significantly changed over the course of our discussions.

As you know, the need for the Colton IMF and Lenwood Staging Tracks is directly attributable to the Authority's High Speed Rail project. BNSF's letter to you dated March 5, 2020 provided a narrative of the "nexus" between, on the one hand, the proposal under the Authority's Los Angeles to Anaheim Track Segment ("Project") to introduce High Speed Rail ("HSR") service on tracks owned by BNSF in the LOSSAN Rail Corridor ("Corridor"), including the segment between CP Soto and Fullerton Junction (the "LA/Fullerton Segment"), and on the other hand, the necessity of building and operating the Colton IMF Facility and the Lenwood Staging Tracks, as required components of the Project. Specifically, to handle the Corridor's projected freight and passenger volumes, a fourth track would need to be added within the Los Angeles to Anaheim Project Section, which could be accommodated largely within the existing BNSF right-of-way, provided that the existing tracks are adjusted laterally, and their separation distance compressed. In addition, the projected train volumes would require that additional facilities be added outside the Corridor to maintain freight and passenger train performance. The proposed Colton IMF and Lenwood Staging Tracks have been identified as necessary project components outside the Corridor that are required to maintain performance at existing levels and accommodate currently projected freight and passenger growth within the Corridor.

BNSF's updated letter to you dated January 29, 2021, clarified that RTC modeling conducted by BNSF demonstrates that the need to construct and operate the Colton IMF would arise from *either* the introduction of HSR service, *or* the increase in non-HSR passenger rail service under the 2030/2040 Comprehensive Passenger Service Plan that is included and accommodated by the Project, whichever occurs first in time.

As you also know, BNSF and the Authority entered into a Memorandum of Understanding dated March 15, 2019 ("2019 MOU"), which provides the fundamental assumptions upon which BNSF understood the environmental review for the Project would be based on. Those assumptions include that the Project includes and accommodates the "2030/2040 Consolidated Passenger Service Plan," which has been developed by the California State Transportation Agency ("CalSTA") and the California Department of Transportation, in conjunction with the Authority and the various existing passenger rail service providers in the LA/Fullerton Segment, to increase the volume and frequency of existing passenger rail service and introduce electrified Authority service in the LA/Fullerton Segment, including anticipated growth in passenger rail service beyond what is permitted in existing contracts between BNSF and those passenger rail service providers, and also includes improvements within and outside the LOSSAN Corridor necessary to accommodate the Plan. The 2030/2040 Consolidated Passenger Service Plan, to a horizon year of 2040, is derived from the *2018 California State Rail Plan* and contemplates certain volumes of daily passenger (both conventional and Authority electrified) and freight train through-put, operating so as to maintain existing levels of on-time performance of both passenger and freight service.

Since the 2019 MOU, BNSF has worked diligently with the Authority on the environmental review for the Colton IMF and improvements in the Corridor. For example, please see David Rankin's email to you dated October 8, 2021, regarding the status and timeliness of Authority review of the deliverables BNSF has submitted to the Authority for the LA-A EIR/EIS, including an attached full list of BNSF deliverables, with submittal dates.

However, it has now become apparent that the underlying assumptions regarding future passenger service levels that were the basis of the 2019 MOU have changed, and there is no longer a common understanding regarding the fundamental assumptions regarding this service. It is our understanding that existing passenger agency stakeholders operating in the corridor have concerns with the LA-A Project as currently described. Based on our discussion on June 10, 2022, we understood that the Authority is working with other passenger operators on a revised service plan for passenger service but we have not seen such revised plan or had the opportunity to evaluate the capital improvements that might be needed to accommodate it. Accordingly, as of today, it is unknown what the actual level of passenger service, and the operating parameters for that service, will be, and therefore, it is unknown what physical improvements will be needed to accommodate that service. As a result, it is too speculative to perform an environmental analysis based on assumptions regarding future passenger levels and operating parameters of service that are no longer valid. In the absence of valid assumptions, it would be purely speculative to identify what physical improvements are necessary and ultimately what the Project is. For example, a reduction in desired HSR or other passenger trains in the corridor may change the improvements necessary to accommodate such trains as a necessary project component. Similarly, without knowing how the various passenger services will operate, additional improvements could be necessary.

Additionally, the lack of funding for the Project is a significant concern. Without a secure source of funding, the long-term viability of the Project is in doubt.

Finally, it has become apparent that there is significant opposition to the Colton IMF. This opposition includes SCAQMD, SBCTA and several public interest groups. As a result, this broad-based opposition to these project components creates a significant risk of potential litigation and associated delay.

As you know, BNSF has been a committed partner to the Authority for the Project. The parties executed the 2019 MOU with the understanding that the parties would make expeditious progress based on a common understanding of the Project. After several years, circumstances have evolved such that the fundamental assumptions of the Project itself have been called into question. Until BNSF and the Authority resolve these issues and come to a mutual understanding about the fundamental assumptions of the Project, BNSF cannot proceed with the environmental review based on the current Project description. BNSF remains willing and committed to working with the Authority to develop a project that meets both parties' needs, based on mutually agreeable assumptions. We look forward to discussing this with you further.

Sincerely,



James Tylick
AVP Passenger Operations

CC: LaDonna DiCamillo, CaHSR
CC: Lena Kent, BNSF
CC: French Thompson, BNSF

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ATTACHMENT C

French F. Thompson, III
General Director
Public Infrastructure and Investments

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Fort Worth, Texas 76131
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French.thompson@bnsf.com

September 5, 2025

LaDonna DiCamillo
Southern California Regional Director
VIA Electronic Mail

RE: LAA Impact Avoidance and Minimization Features

Dear Ms. DiCamillo,

Attached are BNSF's specific comments in response to the Authority's preliminary list of programmatic impact avoidance and minimization features (IAMFs) on its Los Angeles to Anaheim (LA-A) Project Section. Although BNSF is willing to provide you with our comments on the feasibility of this preliminary list, please keep in mind that BNSF has not committed to any construction of improvements or operation of any Authority passenger service on BNSF's right of way.

Any construction of improvements, or operation of Authority passenger service, would be subject to negotiation of definitive agreements between the Authority and BNSF consistent with BNSF's Passenger Principles which have been shared with the Authority. Among other things, such definitive agreements would provide that any construction on BNSF right of way would be performed by BNSF or its contractors, and need to ensure that BNSF is made whole for any costs or operational impacts related to such service; be compensated for use of BNSF's right of way; and be protected from any liability associated with the operation of such service. Also, as noted in the attached, many of the proposed mitigation measures would need to be evaluated and finalized in the context of such agreements.

In addition, as BNSF expressed in an October 12, 2022 letter from James Tylick, AVP Passenger Operations to Bruce Armistead, Director of Operations and Maintenance for the Authority concerning the LA-A Project Section, BNSF had, since 2019 worked diligently with the Authority on environmental review for the LA-A Project Section, and in particular on review of the formerly proposed Colton IMF, which had been identified as a necessary project components outside the LOSSAN Rail Corridor (Corridor), based on a determination that it would be required to maintain performance at existing levels and accommodate contemplated freight and passenger service levels within the Corridor.

The October 12, 2022 Letter further explained that BNSF had initially understood that environmental review of the LA-A Project Section would be based on assumptions provided in a Memorandum of Understanding dated March 15, 2019 (2019 MOU), between BNSF and the Authority, including an assumption that the LA-A Project Section would be based on the "2030/2040 Consolidated Passenger Service Plan" for passenger rail service in the LA/Fullerton Segment of the Corridor. However, as further explained in the October 12, 2022 Letter, it had become apparent to BNSF that the underlying assumptions regarding future passenger service schedules that were the basis of the 2019 MOU had changed, and there was no longer a common understanding regarding the fundamental assumptions regarding this service. In particular, BNSF had not at the time of the October 12, 2022 Letter, seen any updated or revised consolidated service plan for passenger service.

There remains a lack of common understanding between the Authority and BNSF concerning the underlying assumptions on the overall passenger service plans in the LA/Fullerton Segment of the Corridor. Accordingly, it remains unknown what the actual level and operating parameters of passenger service might be or what physical improvements would be needed to implement the LA-A Project Section. Additionally, since that time the Colton IMF has been removed as a component element of the LA-A Project Section without any analysis of the impact such removal has on the achievability of any passenger service levels in the LA/Fullerton Segment of the Corridor.

Thank you,

French Thompson
General Director
Public Infrastructure and Investments.

CC Electronically
Jim Tylick, BNSF
David Rankin, BNSF

HSR

Los Angeles to Anaheim Draft MMRP

Section	Proposed Measure	Comment
		General: Where BNSF follows their own interal/industry Standard or Proccedues, those Standards or Procedures will control to the extent of any conflict. Any construction work on BNSF right of way may only be performed by BNSF or its contractors
Air Quality		
	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.	Accept BNSF does accept this measure. Small Contactors may not have the means, and barrow areas become part of the project site. Truck would have to be washed leaving any barrow areas as well as leaveing the constrcution site. Each time they take a trip.
	* 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.	BNSF does not accept this measure. Depending upon the time of year and where the project is located, three times a day may not be needed. This measure would cause excessive truck trips and water use.
	* Limit vehicle travel speed on unpaved roads to 15 miles per hour.	Accept
	* Suspend any dust-generating activities when instantaneous wind speed exceeds 25 miles per hour.	Accept Accept
	* 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 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.	Accept Accept
	* 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.	Accept
	* 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.	Accept
	* 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.	The Authority must provide any such notice and coordinate review and comment. BNSF will not perform this task.
	AQ-IAMF#2: Selection of Coatings	
	During construction, the Authority-designated contractor will use:	
	* Low-volatile organic compound paint that contains less than 10 percent of volatile organic compound contents (volatile organic compound, 10 percent).	Accept

		Accept
	* Super-compliant or Clean Air paint that has a lower volatile organic compound content than that required by South Coast Air Quality Management District Rule 1113, when available. If not available, the Authority-designated contractor will document the lack of availability, recommend alternative measure(s) to comply with Rule 1113 or disclose absence of measure(s) for full compliance and obtain concurrence from the Authority. **AQ-IAMF#3: Renewable Diesel**	
		BNSF does not accept this measure.
	During construction, the Authority-designated contractor will use renewable diesel fuel to minimize and control exhaust emissions from all heavy-duty diesel-fueled construction diesel equipment and on-road diesel trucks. Renewable diesel must meet the most recent ASTM International (ASTM) D975 specification for Ultra Low Sulfur Diesel and have a carbon intensity no greater than 50 percent of diesel with the lowest carbon intensity among petroleum fuels sold in California. The Authority-designated contractor will provide the Authority with monthly and annual reports, through the Environmental Mitigation Management and Application system, of renewable diesel purchase records and equipment and vehicle fuel consumption. Exemptions to use traditional diesel can be made where renewable diesel is not available from suppliers within 200 miles of the project site. The construction Authority-designated contractor must identify the quantity of traditional diesel purchased and fully document the availability and price of renewable diesel to meet project demand.	
		This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
	AQ-IAMF#4: Reduce Criteria Exhaust Emissions from Construction Equipment	
	Prior to issuance of construction contracts, the Authority or contract administrator will incorporate the following construction equipment exhaust emissions requirements into the contract specifications: 1. All heavy-duty off-road construction diesel equipment used during the construction phase will meet Tier 4 Final engine requirements. 2. A copy of each unit's certified tier specification and any required California Air Resources Board or air pollution control district operating permit will be made available to the Authority at the time of mobilization of each piece of equipment. 3. The Authority-designated contractor will keep a written record (supported by equipment-hour meters where available) of equipment usage during project construction for each piece of equipment. 4. The Authority-designated contractor will provide the Authority with monthly reports of equipment operating hours (through the Environmental Mitigation Management and Assessment system) and annual reports documenting compliance	
Aesthetics and Visual Quality	No Comments.	
Biological Resiouces		

BIO-IAMF#1: Designate Project Biologist, Designated Biologists, Species-Specific Biological Monitors, and General Biological Monitors. At least 15 business days prior to commencement of ground-disturbing activity, including but not limited to geotechnical investigations, utility realignments, creation of staging areas, or initial clearing and grubbing, the Authority-designated contractor will submit the name(s) and qualifications of Project Biologists, Designated Biologists, Species-Specific Biological Monitors, and General Biological Monitors retained to conduct biological resource monitoring activities and implement avoidance and minimization measures to the wildlife agencies. No ground-disturbing activity will begin until the Authority-designated contractor has received written approval from the U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration Fisheries, where applicable, and the California Department of Fish and Wildlife that the biologists and monitors have been approved to conduct the specified work. The Project Biologist is responsible for ensuring the timely implementation of the biological avoidance and minimization measures as outlined in the Biological Resources Management Plan (BRMP), and for guiding and directing the work of the Designated Biologists and Biological Monitors. Designated Biologists will be responsible for directly overseeing and reporting the implementation of general and species- specific conservation measures. In some instances, Designated Biologists will only be approved for specific species, in which case they will only be authorized to conduct surveys and implement measures for the species for which they have been approved. Species-Specific Biological Monitors will be responsible for implementation of species-specific measures for the species for which they have been approved, and will report directly to a Designated Biologist. General Biological Monitors will report directly to a Designated Biologist or to the Project Biologist. General Biological Monitors will be responsible for conducting Worker Environmental Awareness Program (WEAP) training, implementing general conservation measures, conducting general compliance monitoring, and reporting on compliance monitoring activities. The term Project Biologist is used in these IAMFs to mean the Project Biologist, Designated Biologists, Species- Specific Biological Monitors, and General Biological Monitors, as appropriate. When the Authority-designated contractor is specified as implementing an IAMF, it is assumed that the Authority-designated contractor, or its Authority-designated contractor or agent, is implementing the IAMF under the supervision of biologists and Biological Monitors, as appropriate.

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

BIO-IAMF#3: Prepare WEAP Training Materials and Conduct Construction Period WEAP Training

Same as above.

Prior to ground-disturbing activity, the Project Biologist will prepare a WEAP for the purpose of training construction crews to recognize and identify sensitive biological resources that may be encountered in the vicinity of the project footprint. The WEAP training materials will be submitted to the Authority-designated contractor for review and approval. A video of the WEAP training prepared and presented by the Project Biologist and approved by the Authority-designated contractor may be used if the Project Biologist is not available to present the training in person.

Same as above.

At a minimum, WEAP training materials will include the following information: key provisions of the federal Endangered Species Act, the California Endangered Species Act, the Bald and Golden Eagle Protection Act, the Migratory Bird Treaty Act, California Fish and Game Code 1600, the Porter-Cologne Water Quality Control Act, and the Clean Water Act; the consequences and penalties for violation or noncompliance with these laws and regulations and project authorizations; identification and characteristics of special-status plants, special-status wildlife, jurisdictional waters, and special-status plant communities and explanations about their ecological value; hazardous substance spill prevention and containment measures; the contact person in the event of the discovery of a dead or injured wildlife species; and review of avoidance, minimization, and mitigation measures.

BIO-IAMF#4: Conduct Operation and Maintenance Period WEAP Training

BNSF will not accept ongoing limitations to its operations.

Prior to initiating operations and maintenance (O&M) activities, O&M personnel will attend a WEAP training session arranged by the Authority-designated contractor.

Same as above

At a minimum, O&M WEAP training materials will include the following information: key provisions of the Endangered Species Act, California Endangered Species Act, the Bald and Golden Eagle Protection Act, the Migratory Bird Treaty Act, the Porter-Cologne Water Quality Control Act, and the Clean Water Act; the consequences and penalties for violation or noncompliance with these laws and regulations and project authorizations; identification and characteristics of special-status plants, special-status wildlife, jurisdictional waters, and special-status plant communities and explanations about their ecological value; hazardous substance spill prevention and containment measures; and the contact person in the event of the discovery of a dead or injured wildlife species. The training will include an overview of provisions of the BRMP, annual vegetation, and management plan; weed control plan; and security fencing and wildlife exclusion fencing maintenance plans pertinent to O&M activities. A fact sheet prepared by the Authority-designated contractor environmental compliance staff will be prepared for distribution to the O&M employees. The training will be provided by the Authority-designated contractor environmental compliance staff. The training sessions will be provided to employees prior to their involvement in O&M activity and will be repeated for O&M employees on an annual basis. On completion of the WEAP training, O&M employees will, in writing, verify their attendance at the training sessions and confirm their willingness to comply with the requirements set out in those sessions.

BIO-IAMF#5: Prepare and Implement a Biological Resources Management Plan

BNSF will not perform this measure. Authority must retain responsibility.

Prior to ground-disturbing activity, the Project Biologist will prepare the Biological Resources Management Plan (BRMP), which will include a compilation of the biological resources avoidance and minimization measures applicable to the HSR section. Project environmental plans, such as the Restoration and Revegetation Plan and Weed Control Plan, will be included as appendices to the BRMP. The BRMP is intended to serve as a comprehensive document that sets out the range of avoidance and minimization measures to support the appropriate and timely implementation of those measures. The implementation of these measures will be tracked through final design,construction, and operation phases. The BRMP will contain, but not be limited to, the following information:

- A master schedule that outlines construction of the project, preconstruction surveys, and establishment of buffers and exclusions zones to protect sensitive biological resources
- Specific measures for the protection of special-status species
- Identification (on construction plans) of the locations and quantity of habitats to be avoided or removed, along with the locations where habitats are to be restored
-

Identification of agency-approved Project Biologist(s) and Biological Monitor(s), including those responsible for notification and report of injury or death of federally or State-listed species

- Measures to preserve topsoil and control erosion
- Design of protective fencing around Environmentally Sensitive Areas and the construction staging areas

- Locations of trees to be protected as wildlife habitat (roosting sites) and locations for planting replacement trees
- Specification of the purpose, type, frequency, and extent of chemical use for insect and disease control operations as part of vegetative maintenance within sensitive habitat areas
- Specific measures for the protection of vernal pool habitat and riparian areas. These measures may include erosion and siltation control measures, protective fencing guidelines, dust control measures, grading techniques, construction area limits, and biological monitoring requirements

- Provisions for biological monitoring during ground-disturbing activities to confirm compliance and success of protective measures. The monitoring will: (1) identify specific locations of wildlife habitat and sensitive species to be monitored; (2) identify the frequency of monitoring and the monitoring methods (for each habitat and sensitive species to be monitored); (3) list required qualifications of Biological Monitor(s); (4) identify the reporting requirements; and (5) provide an accounting of impacts on special-status species habitat compared to preconstruction impact estimates

The BRMP will be submitted to the Authority for review and approval prior to ground-disturbing activity.

BIO-IAMF#6: Establish Monofilament Restrictions

Prior to any ground-disturbing activity, the Project Biologist will verify that plastic monofilament netting (erosion control matting) or similar material is not being used as part of erosion control activities. The Project Biologist will identify acceptable material for such use, including geomembranes, coconut coir matting, tackified hydroseeding compounds, and rice straw wattles (e.g., Earthsaver wattles: biodegradable, photodegradable, burlap). Within developed or urban areas, the Project Biologist may allow exceptions to the restrictions on the type of erosion control material if the Project Biologist determines that the construction area is of sufficient distance from natural areas to ensure the avoidance of potential impacts on wildlife.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
BIO-IAMF#7: Prevent Entrapment in Construction Materials and Excavations At the end of each workday during construction, the Authority-designated contractor will cover excavated, steep-sided holes or trenches more than 8 inches deep and that have sidewalls steeper than 1:1 (45 degree) slope with plywood or similar materials, or provide a minimum of one escape ramp per 100 feet of trenching (with slopes no greater than 3:1) built of earth fill or wooden planks. The Project Biologist will thoroughly inspect holes and trenches for trapped animals at the start and end of each workday. The Authority-designated contractor will screen, cover, or elevate at least 1 foot above ground, construction pipe, culverts, or similar structures with a diameter of 3 inches or greater that are stored overnight within the project footprint. These pipes, culverts, and similar structures will be inspected by the Project Biologist for wildlife before such material is moved, buried, or capped.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
BIO-IAMF#8: Delineate Equipment Staging Areas and Traffic Routes Prior to ground-disturbing activity, the Authority-designated contractor will establish staging areas for construction equipment in areas that minimize effects on sensitive biological resources, including habitat for special-status species, seasonal wetlands, and wildlife movement corridors. Staging areas (including temporary material storage areas) will be in areas occupied by permanent facilities, where practicable. Equipment staging areas will be identified on final project construction plans. The Authority-designated contractor will flag and mark access routes to ensure that vehicle traffic within the project footprint is restricted to established roads, construction areas, and other designated areas	Accept
BIO-IAMF#9: Dispose of Construction Spoils and Waste During ground-disturbing activities, the Authority-designated contractor may temporarily store excavated materials produced by construction activities in areas at or near construction sites within the project footprint. Where practicable, the Authority-designated contractor will return excavated soil to its original location to be used as backfill. Excavated waste materials unsuitable for treatment and reuse will be disposed of at an off-site location, in conformance with applicable state and federal laws.	Accept
BIO-IAMF#10: Clean Construction Equipment Prior to ground-disturbing activity, the Authority-designated contractor will ensure that equipment entering the work area is free of mud and plant materials. The Authority-designated contractor will establish vehicle cleaning locations designed to isolate and contain organic materials and minimize opportunities for weeds and invasive species to move in and out of the project footprint. Cleaning may be done by washing with water, blowing with compressed air, brushing, or other hand cleaning. The cleaning areas will be located so as to avoid impacts on surface waters and appropriate Stormwater Pollution Prevention Plan (SWPPP) best management practices (BMP) will be implemented so as to further control potential for the spread of weeds or other invasive species. Cleaning stations will be inspected regularly (at least monthly).	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
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.

This is redundant for the SWPPP requirements under the NEW CA 2022 GCP. BNSF does not accept.

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.

Again BMP training is part of the SWPPP Reuirements. BNSF does not accept.

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:

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

- 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 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.

Cultural Resources

CUL-IAMF#1: Geospatial Data Layer and Archaeological Sensitivity Map

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

Prior to construction (any ground-disturbing activities) and staging of materials and equipment, the Authority-designated contractor's archaeologist or geoarchaeologist will prepare a geospatial data layer identifying the locations of all known archaeological resources and built historic resources that require avoidance or protection, and areas of archaeological sensitivity that require monitoring within the area of potential effect. The Authority-designated contractor's archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards provided in 36 Code of Federal Regulations (CFR) Part 61, is to use, as appropriate, a combination of the following: known locations of archaeological sites and built historic properties, tribal consultation, landforms, depositional processes, distance to water, mapping provided in the Archaeological Treatment Plan, or historical mapping. This mapping is to be updated as the design progresses if it results in an expansion of the area of ground disturbance/area of potential effect, including temporary construction easements and new laydown and access areas. This mapping will be used to develop an archaeological monitoring plan to be prepared by the Authority-designated contractor's archaeologist, and on approval by the Authority, applied by the Authority-designated contractor's archaeologist. When design is sufficiently advanced, a geospatial data layer will be produced by the Authority-designated contractor overlaying the locations of all known archaeological resources and built historic resources within the area of potential effect for which avoidance measures are necessary, and all archaeologically sensitive areas for which monitoring is required.

CUL-IAMF#2: Worker Environmental Awareness Program Training Session

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

Prior to construction (any ground-disturbing activity), construction Authority-designated contractor personnel who work on site will attend a WEAP training session provided by the Authority- designated contractor. The WEAP will include cultural resources awareness training performed by the Authority-designated contractor's archaeologist or architectural historian who meets the Secretary of the Interior's Professional Qualification Standards provided in 36 CFR Part 61. The Authority-designated contractor will develop instructional materials and a fact sheet for distribution to the construction crews, and submit the materials, as well as qualifications of the personnel providing the training, to the Authority for approval at least 15 days prior to being permitted on-site access. The training will address measures required to avoid or protect built historic resources, and to educate crews on artifacts and archaeological features they may encounter and the mandatory procedures to follow should potential cultural resources be exposed during construction. Translation services will be provided by the Authority-designated contractor for non-English-speaking participants. The training sessions will be given prior to the initiation of any ground disturbance activities and repeated on an annual basis. Additionally, new construction crewmembers will attend an initial WEAP training session prior to working on site.

On completion of the WEAP training, construction crews will sign a form stating that they attended the training, understood the information presented, and will comply with the WEAP requirements. The Authority-designated contractor's archaeologist will submit the signed WEAP training forms to the Mitigation Manager on a monthly basis. On an annual basis, the Authority- designated contractor will provide the Authority with a letter indicating that regular WEAP training has been implemented and will provide at least one PowerPoint annually of the WEAP training. On a monthly basis, the Authority-designated contractor's archaeologist will provide updates and synopsis of the training to workers during the daily safety ("tailgate") meeting. Construction crews will be informed during the WEAP training that, to the extent possible, travel within the marked project site will be restricted to established roadbeds.

CUL-IAMF#3: Preconstruction Cultural Resource Surveys

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

Prior to construction (any ground-disturbing activities in areas not yet surveyed) and the staging of materials and equipment, the Authority-designated contractor will conduct preconstruction cultural resource surveys. Resulting from lack of legal access, much of the construction footprint may not have been surveyed. Once parcels are accessible the Authority-designated contractor will have archaeologists or architectural historians, as appropriate, who meet the Secretary of the Interior's professional qualification standards, survey and complete reporting in appropriate document for archaeology or built resources, in accordance with documentation requirements stipulated in the Section 106 Programmatic Agreement. Identified resources will be evaluated for the National Register of Historic Places and the California Register of Historical Resources. The qualified archaeologist or architectural historian, as appropriate, will assess the potential to affect historic properties (National Register of Historic Places) by applying the effects criteria in 36 CFR Part 800.5(a)(1), and the potential of significant impacts on historical resources (California Register of Historical Resources) by applying the criteria in California Environmental Quality Act Guidelines 15064.5(b). Should the Authority and FRA determine, in consultation with the State Historic Preservation Officer (SHPO), that any newly identified historic properties or historical resources will be adversely affected, the Built Environment Treatment Plan (BETP) or Archaeological Treatment Plan, as appropriate, will be amended, to document mitigation measures agreed on by the memorandum of agreement signatories. The schedule of these surveys will be dependent on the timing of obtaining legal access to the properties and may be driven by the need to complete construction-related activities (e.g., geotechnical borings, laydown yards). Prior to beginning surveys, updated records searches may be required by the Authority and FRA, depending on the length of the passage of time, to validate that accurate information was obtained regarding previous inventory and evaluation efforts. The Authority-designated contractor's archaeologist, in consultation with the Authority, will determine if an updated records search is required. If an updated records search is necessary, the search will be performed by the Authority-designated contractor's archaeologist

CUL-IAMF#4: Relocation of Project Features when Possible

Accept

Changing the rail alignment to avoid newly discovered sites is likely infeasible; however, access areas and laydown sites may be relocated should their proposed location be found to be on archaeological sites or have the potential to affect historic built resources in the vicinity. The Authority-designated contractor will delineate all of the applicable avoidance and protection measures as identified in the final treatment plans for identified archaeological and historic built resources on construction drawings prior to the start of construction. Additionally, as the design progresses, the Authority-designated contractor will site project features such as communication towers or other rail infrastructure to avoid and protect identified archaeological and built historic properties and historical resources. The Authority will establish regular coordination meetings with the Authority-designated contractor's qualified staff of archaeologists and architectural historians to ensure that the identified resources are avoided and the project designs have taken these resources into account.

CUL-IAMF#5: Archaeological Monitoring Plan and Implementation

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

Prior to construction, the Authority's professionally qualified archaeologist, as defined in the Section 106 Programmatic Agreement, will prepare a monitoring plan based on the results of geospatial data layer and archaeological sensitivity map. The plan will be reviewed and approved by the Authority prior to any ground-disturbing activities. During construction (any ground- disturbing activities) or staging of materials or equipment, the Authority-designated contractor will be responsible for executing the monitoring plan and providing archaeological and tribal monitoring of ground-disturbing construction activities with a potential to affect archaeological remains in areas identified as archaeologically sensitive in the Archaeological Treatment Plan.
The Authority-designated contractor will obtain Authority approval of all persons providing archaeological or tribal monitoring

CUL-IAMF#6: Preconstruction Conditions Assessment, Plan for Protection of Historic Built Resources, and Repair of Inadvertent Damage

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

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 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

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

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.

CUL-IAMF#8: Implement Protection and/or Stabilization Measures

		This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
	The Authority-designated contractor will implement the measures described in the Plan for Protection of Historic Resources and Repair of Inadvertent Damage and in the BETP. Such protection measures will include, but will not be limited to, vibration monitoring of construction in the vicinity of historic built resources; cordoning off of resources from construction activities (e.g., traffic, equipment storage, personnel); shielding of resources from dust or debris; and stabilization of buildings and structures adjacent to construction. The monitoring measures described in the BETP will ensure that protection measures are in place before construction begins. Additionally, monitoring during construction will verify that the protection measures are effective. For resources requiring vibration monitoring, the monitor will be responsible for setting up on-site vibration monitoring devices at the approximate location of the construction site; monitoring vibration levels and issuing a temporary work stoppage if maximum vibration level thresholds are reached; implementing the procedures outlined in a vibration monitoring and control plan if construction activities result in vibration exceedances or an unanticipated impact occurs; reporting to the Authority any concerns or issues related to the historic built resources within the area of potential effects that may require further investigation; and documenting monitoring activities in a daily log and summarizing these activities in a monthly report. The Authority-designated contractor will submit the monitoring logs and monthly reports to the Authority as they are completed. Temporary stabilization and protection measures will be removed after construction is complete, and the historic built resources will be restored to their preconstruction condition. For buildings that will be moved, treatment will include stabilization before, during, and after relocation; protection during temporary storage; and relocation to a new site, followed by rehabilitation.	
Electromagnetic Fields/Electromagnetic Interference Standards		
	EMF/EMI-IAMF#1: Preventing Interference with Adjacent Railroads	Clarify
	EMF/EMI-IAMF#2: Controlling Electromagnetic Fields/Electromagnetic Interference	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
Environmental Justice		
	EJ-IAMF#1: Authority EJ Ombudsman and Authority-Designated Contractor's EJ Liaison	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
	EJ-IAMF#2: Business Spotlighting	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
	EJ-IAMF#3: EJ Community-Inclusive Development of Aesthetic Treatments and Community Cohesion Enhancements	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
	EJ-IAMF#4: EJ Business Relocation/Displacement Assistance	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
	EJ-IAMF#6: Nonregulatory Supplemental and Informational Monitoring	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
Geologic Resources		
	GEO-IAMF#1: Geologic Hazards	

Prior to construction, the Authority-designated contractor will prepare a Construction Management Plan (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:	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
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.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
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.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
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.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
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 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.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

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 Non- Hazardous Faults, Potentially Hazardous Fault Zones, or Hazardous Fault Zones through a progressive process described in Technical Memorandum (TM) 2.10.6, entitled, Fault Hazard and Mitigation Guidelines (Parsons Brinkerhoff, 2014). TM 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#2: Slope Monitoring

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

During O&M, the Authority will incorporate slope monitoring by a Registered Engineering Geologist into the O&M procedures. The procedures will be implemented at sites identified in the CMP where a potential for long-term instability exists from gravity or seismic loading including but not limited to at-grade sections where slope failure could result in loss of track support, or where slope failure could result in additional earth loading to foundations supporting elevated structures.

GEO-IAMF#3: Gas Monitoring

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

Prior to construction, the Authority-designated contractor shall prepare a CMP addressing how gas monitoring will be incorporated into construction BMPs. The CMP will be submitted to the Authority for review and approval. Hazards related to potential migration of hazardous gases caused by the presence of known oil and gas fields, areas of active or historical landfills, or other subsurface sources can be reduced or eliminated by following strict federal and state Occupational Safety & Health Administration regulatory requirements for excavations, and by consulting with other agencies as appropriate, such as the California Geologic Energy Management Division, California Environmental Protection Agency, and Department of Toxic Substances Control, regarding known areas of concern.

Practices will include using safe and explosion-proof equipment during construction and testing for gases regularly. Installation of passive or active gas venting systems, gas collection systems, as well as active monitoring systems and alarms will be required in underground construction areas and facilities where subsurface gases are present. Installing gas-detection systems can monitor the effectiveness of these systems.

Note #4 and #5 are missing

GEO-IAMF#6: Ground Rupture Early Warning Systems

Prior to construction, the Authority-designated contractor shall document how the project design incorporates installation of early warning systems, triggered by strong ground motion association with ground rupture. Known nearby active faults will be monitored. Linear monitoring systems such as time domain reflectometers or similar technology shall be installed along rail lines in the zone of potential ground rupture. These devices emit electronic information that is processed in a centralized location and will be used to temporarily control trains, thus reducing accidents caused by fault creep. Damage to infrastructure from fault creep can be mitigated with routine maintenance including minor realignment.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
GEO-IAMF#7: Evaluate and Design for Large Seismic Ground Shaking	BNSF will not accept ongoing operations requirements
GEO-IAMF#8: Suspension of Operations During an Earthquake	See above
GEO-IAMF#9: Subsidence Monitoring	See above
GEO-IAMF#10: Geology and Soils	See above
GEO-IAMF#11: Engage a Qualified Paleontological Resources Specialist Prior to the 90 percent design milestone for each construction package2 (CP) within the project section, the Authority-designated contractor will retain a Paleontological Resources Specialist (PRS) responsible for: · Reviewing the final design for the CP •Developing a detailed Paleontological Resources Monitoring and Mitigation Plan (PRMMP) for the CP •Implementing the PRMMP by the PRS, including development and delivery of WEAP training, supervision of Paleontological Resource Monitors, evaluation and treatment of finds, if any, and preparation of a final paleontological mitigation report, per the PRMMP and for each CP Retention of PRS staff will occur in a timely manner, in advance of the 90 percent design milestone for each CP, such that the PRS is on board and can review the 90 percent design submittal without delay when it becomes available. If feasible, the same PRS will be responsible for all CPs within a given project section. All PRS staff will meet or exceed the qualifications for a Principal Paleontologist as defined in Caltrans current Standard Environmental Reference, Chapter 8 (Caltrans 2014). Appointment of PRS staff will be subject to review and approval by the Authority.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
GEO-IAMF#12: Perform Final Design Review and Triggers Evaluation For each CP within the project section, the responsible PRS will evaluate the 90 percent design submittal to identify the portions of the CP that will involve work in paleontologically sensitive geologic units (either at the surface or in the subsurface), based on findings of the final Paleontological Resources Technical Report prepared for the project section. Evaluation will consider the location, areal extent, and anticipated depth of ground disturbance; the construction techniques that are planned/proposed; and the geology (i.e., location of geologic units with high potential for paleontological resources) of the CP and vicinity. The evaluation and resulting recommendations will be consistent with guidance in the Society of Vertebrate Paleontology (SVP) Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010), the SVP Conditions of Receivership for Paleontologic Salvage Collections (SVP 1996), and relevant guidance from Chapter 8 of the current Caltrans Standard Environmental Reference (Caltrans 2014).	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
The purpose of the Final Design Review and Triggers Evaluation will be to develop specific language detailing the location and duration of paleontological monitoring and other requirements for paleontological resources applicable to each CP within the project section. Paleontological protection requirements identified through the Final Design Review and Triggers Evaluation will be recorded in a concise technical memorandum (“Final Design Review Requirements for Paleontological Resources Protection”), which will then be incorporated in full detail into the PRMMP for each CP. Those portions of the CP requiring paleontological monitoring will also be clearly delineated in the project construction documents for each CP.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
GEO-IAMF#13: Prepare and Implement a Paleontological Resource Monitoring and Mitigation Plan	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

Following the Final Design Review and Triggers Evaluation for each CP, the PRS will develop a CP-specific PRMMP. For greater efficiency, PRMMPs may be written such that they cover more than one CP, as long as the specific requirements of the IAMFs are satisfied explicitly and in detail for each CP included.

The PRMMP for each CP will incorporate the findings of the Design Review and Triggers Evaluation for that CP and will be consistent with the SVP's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010), the SVP Conditions of Receivership for Paleontologic Salvage Collections (SVP 1996), and relevant guidance from Chapter 8 of the current Caltrans Standard Environmental Reference (Caltrans 2014). Therefore, the PRMMP will provide for at least the following:

Specialist: The PRS will be required to meet or exceed Principal Paleontologist qualifications per Chapter 8 of the current Caltrans Standard Environmental Reference (Caltrans 2014). The Supervising Paleontologist may, but not necessarily, be the PRS who prepares the PRMMP.

– Paleontological Resources Monitors: The PRS will be required to meet or exceed Paleontological Monitor qualifications per Chapter 8 of the current Caltrans Standard Environmental Reference (Caltrans 2014).

• Development of preconstruction and construction-period coordination procedures and communications protocols.

• Evaluation as to whether a preconstruction survey by qualified personnel is warranted for the CP. In general, preconstruction surveys are beneficial if there is a strong possibility that significant paleontological resources (e.g., concentrations of vertebrate fossils) are exposed at the ground surface and will be destroyed during the initial clearing and grubbing phase of earthwork. Such a determination can usually be made during preparation of the paleontological resources TR.

• Requirements for paleontological monitoring by qualified paleontological resources monitors of all ground disturbance activities known to affect, or potentially affect, highly sensitive geologic units and for ground disturbance activities affecting other geologic units in any areas where the PRS considers it warranted based on the findings of the paleontological resources technical report or any preconstruction surveys. In all areas of the CP subject to monitoring, monitoring will initially be conducted full time for all ground disturbance activities. However, the PRMMP may provide for monitoring frequency in any given location to be reduced once approximately 50 percent of the ground disturbance activity has been completed, if the reduction is appropriate based on the implementing PRS's professional judgment in consideration of actual site conditions.

• Provisions, if recommended by the PRS for paleontological monitoring of specific construction drilling operations. In general, small-diameter (i.e., smaller than 18 inches) drilling operations or drilling operations using bucket augers tend to pulverize affected sediments and any contained fossils and are typically not monitored. The section in the PRMMP addressing monitoring for drilling operations will rely, in part, on the information supplied by the CP design and geotechnical teams, but will also take into consideration the nature, depth, and location of drilling needed, and the anticipated equipment and staging configurations.

• Provisions for the content development and delivery of paleontological resources WEAP training.

• Provisions for in-progress documentation of monitoring (and, if applicable, salvage/recovery operations) via "construction

GEO-IAMF#14: Provide Worker Environmental Awareness Program Training for Paleontological Resources

Prior to groundbreaking for each CP within the project section, the Authority-designated contractor will provide paleontological resources WEAP training delivered by the PRS. All management and supervisory personnel and construction workers involved with ground- disturbing activities will be required to take this training before beginning work on the project. Refresher training will also be made available to management and supervisory personnel and workers as needed, based on the judgment of the PRS.

At a minimum, paleontological resources WEAP Training will include information on:

- Coordination between construction staff and paleontological staff
- Construction and paleontological staff roles and responsibilities in implementing the PRMMP
- The possibility of encountering fossils during construction
- The types of fossils that may be seen and how to recognize them
- Proper procedures in the event fossils are encountered, including the requirement to halt work in the vicinity of the find and procedures for notifying responsible parties in the event of a find

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

Training materials and formats may include, but are not necessarily limited to, in-person training, prerecorded videos, posters, and informational brochures that provide contacts and summarize procedures in the event paleontological resources are encountered. WEAP Training contents will be subject to review and approval by the Authority. Paleontological resources WEAP Training may be provided concurrently with cultural resources WEAP Training. On completion of any WEAP training, the Authority-designated contractor will require workers to sign a form stating that they attended the training and understand and will comply with the information presented. Verification of paleontological resources WEAP training will be provided to the Authority by the Authority-designated contractor.	
GEO-IAMF#15: Halt Construction, Evaluate, and Treat If Paleontological Resources Are Found Consistent with the PRMMP, if fossil materials are discovered during construction, regardless of the individual making the discovery, all activity in the immediate vicinity of the discovery will halt and the find will be protected from further disturbance. If the discovery is made by someone other than the PRS or paleontological resource monitor(s), the person who made the discovery will immediately notify construction supervisory personnel, who will in turn notify the PRS. Notification to the PRS will take place promptly (prior to the close of work the same day as the find), and the PRS will evaluate the find and prescribe appropriate treatment as soon as feasible. Work may continue on other portions of the CP while evaluation (and, if needed, treatment) takes place, as long as the find can be adequately protected in the judgment of the PRS. If the PRS determines that treatment (i.e., recovery and documentation of unearthed fossil[s]) is warranted, such treatment, and any required reporting, will proceed consistent with the PRMMP. The Authority-designated contractor will be responsible for ensuring prompt and accurate implementation, subject to verification by the Authority. The stop-work requirement does not apply to drilling operations because drilling typically cannot be suspended in mid-course. However, if finds are made during drilling, the same notification and other follow-up requirements will apply. The PRS will coordinate with construction supervisory and drilling staff regarding the handling of recovered fossils. The requirements of this IAMF will be detailed in the PRMMP and presented as part of the paleontological resources WEAP training.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
Hazardous Materials and Waste	
HMW-IAMF#1: Property Acquisition Phase I and Phase II Environmental Site Assessments, Additional Preconstruction Investigations, and Associated Actions to Control Site Contamination	Preconstrction Study
HMW-IAMF#2: Landfill	Accept
HMW-IAMF#3: Work and Vapor Barriers	Accept
HMW-IAMF#4: Known, Suspected, and Unanticipated Environmental Contamination	Accept
HMW-IAMF#5: Demolition Plans	Accept
HMW-IAMF#6: Spill Prevention	Accept
HMW-IAMF#7: Storage and Transport of Materials	Accept
HMW-IAMF#8: Permit Conditions	Accept
HMW-IAMF#9: Environmental Management System	
HMW-IAMF#10: Hazardous Materials Plans Prior to O&M activities, the Authority will prepare hazardous materials monitoring plans. These will use a basis source, such as a hazardous materials business plan as defined in Title 19 California Code of Regulations and a spill prevention, control, and countermeasure plan.	BNSF will not accept ongoing operations requirements.

Hydrology and Water Resources

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.

SWPPP and NPDES

HYD-IAMF#2: Flood Protection

Prior to construction, the Authority-designated contractor will prepare a flood protection plan for Authority review and approval. The flood protection plan will be prepared to ensure that the project is designed to both remain operational during flood events and minimize increases in 100- year flood elevations. The Authority-designated contractor will be responsible for implementation of the design standards as presented in the flood protection plan. Design standards, as itemized in the flood protection plan, will include the following:

- Establish track elevation to prevent saturation and infiltration of stormwater into the sub- ballast.

- Minimize development within the floodplain to such an extent that the water surface elevation in the floodplain will not increase by more than 1 foot, or as required by state or local agencies, during the 100-year flood flow. Avoid placing facilities in the floodplain or raising the ground with fill above the base-flood elevation.

- Design the floodplain crossings to maintain a 100-year floodwater surface elevation of no greater than 1 foot above current levels, or as required by state or local agencies, and ensure project features within the floodway itself will not increase existing 100-year floodwater surface elevations in Federal Emergency Management Agency–designated floodways or as otherwise agreed on with the local county flood control district floodplains manager.

The following design standards will minimize the effects of pier placement on floodplains and floodways:

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

	· Design site crossings to be as nearly perpendicular to the channel as feasible to minimize bridge length. •Orient piers to be parallel to the expected high-water flow direction to minimize flow disturbance. •Elevate bridge crossings at least 3 feet above the high-water surface elevation to provide adequate clearance for floating debris or as required by local agencies. •Conduct engineering analyses of channel scour depths at each crossing to evaluate the depth for burying the bridge piers and abutments. Implement scour-control measures to reduce erosion potential. •Use quarry stone, cobblestone, or their equivalent for erosion control along rivers and streams, complemented with native riparian plantings or other natural stabilization alternatives that will restore and maintain a natural riparian corridor. •Place bedding materials under the stone protection at locations where the underlying soils require stabilization as a result of streamflow velocity.	
	HYD-IAMF#3: Prepare and Implement a Construction Stormwater Pollution Prevention Plan	SWPPP must meet 2022 CA GCP Criteria
Station Planning, Land Use, and Development		
		BNSF will not maintain stations and will not be responsible for this.
	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.	
	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.	This measure is subject to further review and discussion in the event a project commences. BNSFwill not maintain stations and will not be responsible for this..
	LU-IAMF#3: Restoration of Land Used Temporarily During Construction Prior to any ground-disturbing activities at the site of land to be used temporarily during construction, the Authority-designated contractor shall prepare a restoration plan addressing specific actions, sequence of implementation, parties responsible for implementation and successful achievement of restoration for temporary impacts. Before beginning construction use of land, the Authority-designated contractor will submit the restoration plan to the Authority for review and obtain Authority approval. The restoration plan will include time-stamped photo documentation of the preconstruction conditions of all temporary staging areas. All construction access, mobilization, material laydown, and staging areas will be returned to a condition equal to the preconstruction staging condition. This requirement is included in the design-build construction contract requirements.	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.
Noise and Vibration		
	NV-IAMF#1: Noise and Vibration	This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

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 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.
- Phase demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period.
- Avoid impact pile driving where possible in vibration sensitive areas.

Parks, Recreation, and Open Space

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

PK-IAMF#1: Parks, Recreation, and Open Space

Prior to construction, the Authority-designated contractor shall prepare and submit to the Authority a technical memorandum that identifies project design features to be implemented to minimize impacts on parks, recreation, and open space during construction and operation.

Typical design measures to avoid or minimize impacts on parks and recreation may include:

- Provide safe and attractive access for present travel modes (e.g., motorists, bicyclists, pedestrians—as applicable) to existing park and recreation facilities.
- Design guideway, system, and station features in such a way as to enhance the surrounding local communities. Provide easy crossings of the guideway, which allows for community use under the guideway or at station areas.

Public Utilities and Energy

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

PUE-IAMF#1: Design Measures

The HSR project design incorporates utilities and design elements that minimize impacts on public utilities. A key objective is to minimize electricity consumption (e.g., using regenerative braking, energy-saving equipment on rolling stock and at station facilities, implementing energy saving measures during construction, and automatic train operations to maximize energy efficiency during operations). Therefore, the project will not overburden electric utility services during construction or operation. These design elements are included in the design-build contract. Additionally, the Authority has adopted a sustainability policy (POLI-1007) that establishes project design and construction requirements that avoid and minimize impacts on public utilities. The policy commits the Authority to work toward net-zero water consumption during operations with compliance with the California Green Building Standards Code and net-zero energy consumption, with facilities Leadership in Energy Environmental Design–certified at the platinum level. The Authority also has committed to using 100 percent renewable energy for operation.

During construction, the policy calls for implementing the following:

- Follow construction waste practices that divert at least 85 percent of waste from landfill, unless the local regulation is higher.
- Recycle all steel and concrete waste generated.
- Reduce potable water use.
- Maximize the use of renewable transportation fuels.
- In compliance with the International Standards Organization 14001 standard, the Authority's contract requirements for the design-build Authority-designated contractor will be monitored throughout construction, performance data collected through the EMMA database, and data compiled into annual reports for verification and continuous improvement of sustainability practices, including minimizing impacts on public utilities.

The Authority, or Authority-designated contractor, shall comply with the Authority's Sustainability Policy in effect at the time of contracting (e.g., POLI-1007).

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.

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

PUE-IAMF#4: Utilities and Energy

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept this blanket measure in advance.

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 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.

Safety and Security

This measure is subject to further review and discussion in the event a project commences. BNSF cannot accept these blanket measures in advance.

SS-IAMF#1: Construction Safety Transportation Management Plan
SS-IAMF#2: Safety and Security Management Plan
SS-IAMF#3: Hazard Analyses
SS-IAMF#4: Oil and Gas Wells
SS-IAMF#5: Aviation Safety

This measure is subject to further review and discussion in the event a project commences. This would be an Authority task.

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 Part 77.9(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.

Socioeconomics and Communities

These measures would be Authority responsibility.

SOCIO-IAMF#1: Construction Management Plan
SOCIO-IAMF#2: Compliance with Uniform Relocation Assistance and Real Property Acquisition Policies Act
SOCIO-IAMF#3: Relocation Implementation Plan

Transportation

These measures would be Authority responsibility.

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.

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.
- 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.

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.

TR-IAMF#4: Maintenance of Pedestrian Access

The Authority-designated contractor will prepare specific CMPs, as part of the CTP, to address maintenance of pedestrian access during the construction period, to the extent feasible, in accordance with design, safety, and Americans with Disabilities Act requirements. Construction actions that limit pedestrian access will include, but not be limited to, sidewalk closures, bridge closures, crosswalk closures or pedestrian rerouting at intersections, placement of construction- related material within pedestrian pathways or sidewalks, and other actions that may affect the mobility or safety of pedestrians during the construction period. If sidewalks are maintained along the construction site frontage, the Authority-designated contractor will provide covered walkways and fencing.

TR-IAMF#5: Maintenance of Bicycle Access
The Authority-designated contractor will prepare specific CMPs to address maintenance of bicycle access during the construction period, to the extent feasible, in accordance with design, safety, and Americans with Disabilities Act requirements. Construction actions that limit bicycle access will include, but not be limited to, bike lane closures or narrowing, closure or narrowing of streets that are designated bike routes, bridge closures, placement of construction-related materials within designated bike lanes or along bike routes, and other actions that may affect the mobility or safety of bicyclists during the construction period.

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.

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.

TR-IAMF#9: Protection of Freight and Passenger Rail During Construction

The Authority-designated contractor will 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. If necessary, during construction, a "shoofly" track will be built to allow existing train lines to bypass any areas closed for construction activities. On completion, tracks will be opened and repaired, or new mainline track will be built, and the "shoofly" will be removed. Authority-designated contractor repair responsibility will be included in the contract.

TR-IAMF#11: Maintenance of Transit Access

The Authority-designated contractor will prepare specific CMPs, as part of the CTP, to address maintenance of transit access during the construction period, to the extent feasible, in accordance with design, safety, and Americans with Disabilities Act requirements. Construction actions that limit transit access will include, but not be limited to, roadway lane closures or narrowing, closure or narrowing of streets that are designated transit routes, bus stop closures, bridge closures, placement of construction-related materials within designated transit lanes, bus stop or layover zones or along transit routes, and other actions that may affect the mobility or safety of bus transit during the construction period.

TR-IAMF#12: Pedestrian and Bicycle Safety

Prior to construction, the Authority-designated contractor will provide a technical memorandum describing how, during operation, pedestrian and bicycle accessibility will be provided and supported across the HSR corridor, to and from stations and on station property. Priority of safety for pedestrians and bicycles and vulnerable populations over motor vehicle access will be carried out in a manner to encourage maximum potential access from nonmotorized modes. Local access programs, such as Safe Routes to Schools, will be maintained or enhanced. Access to community facilities for vulnerable populations will be maintained or enhanced.

IAMF#13: Stakeholder Coordination with Transportation Agencies

As design of the Los Angeles to Anaheim Project Section progresses, the Authority shall continue to coordinate with agencies that provide existing or planned rail services and/or maintain operating rights within the corridor, including BNSF Railway, Southern California Regional Rail Authority (Metrolink), LOSSAN, Amtrak, Orange County Transportation Authority, and Riverside County Transportation Commission. The purpose of this ongoing stakeholder coordination is to ensure that the design, construction, and operation of the Los Angeles to Anaheim Project Section does not negatively impact existing and planned rail service, including bus routes that service existing and planned rail stations. The Authority shall work with the agencies to define roles and responsibilities within the shared corridor, including operational and maintenance responsibilities.

23.25 Response to Submission 013846 (Teresa Stephens, BNSF Railway, Feb 3, 2026)

23.25.1 3169

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.

Section 2.5.2, Range of Potential Alternatives Considered and Findings, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) documents the reasons why the California High-Speed Rail Authority (Authority) eliminated the BNSF Railway (BNSF) Lenwood and Colton Components from the Los Angeles to Anaheim Project Section (project section). After scoping the 2018 High-Speed Rail (HSR) Project Alternative, the Authority received substantial opposition to and concern about the BNSF 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.

The Authority respectfully disagrees that the project is too speculative for environmental analysis based on uncertainty about future levels of passenger service. The Shared Passenger Track Alternatives have been defined with a reasonable degree of forecasting about future operations to enable analysis that allows decision-makers and the public to understand the environmental consequences. Refer to Impact TR-15 in Section 3.2, Transportation, of the Draft EIR/EIS for an analysis of the effects on freight and passenger rail volumes, which includes a summary of the Authority's operational analysis of the corridor.

23.25.2 3171

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.

Section 1.1.1, The High-Speed Rail System, of the Draft EIR/EIS explains that the Authority has responsibility for planning, designing, building, and operating a high-speed passenger rail system. Recognizing the importance of freight rail in the project section, the California Environmental Quality Act (CEQA) project objectives include an objective to "minimize conflicts between freight and passenger rail services." Similarly, the National Environmental Policy Act (NEPA) purpose and need statement explains that the project is intended to "provide the public with electric-powered HSR service that provides predictable and consistent travel times." Section 1.2.2, Purpose of the Los Angeles to Anaheim Project Section, and Section 1.2.3, CEQA Project Objectives of the High-Speed Rail System in California and Within the Los Angeles to Anaheim Project Section, however, are appropriately focused on providing the public with electric-powered high-speed passenger rail.

The Authority has revised TR-IAMF#13, Stakeholder Coordination with Transportation Agencies, in the Final EIR/EIS to clarify the outcomes of the future agreements to be determined among the freight and passenger rail operators within the corridor. Refer to Section 16.19, Appendix 2-A: Impact Avoidance and Minimization Features, in Chapter 16, Corrections and Additions to the Draft Report, of the Final EIR/EIS for these revisions.

23.25.3 3172

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

23.25.4 3173

The commenter is correct that the overhead contact system (OCS) wire heights are measured from top of rail. As the Preliminary Engineering for Project Definition (PEPD) indicates, a 24.5-foot wire height will be used where plate "H" (i.e., Double-Stack) clearances are required. Where BNSF does

not operate double-stack trains, such as between Fullerton and Anaheim, a 17.5-foot wire height would be used. The exact heights of the wires would be determined at a later phase of design. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.5 3174

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

The two HSR trains per hour per direction are for passenger service only and do not include deadhead movements. However, the Authority's operational analysis included nonrevenue movements, and one of the functions of the proposed layover tracks in Anaheim is to minimize deadhead/positioning movements. Because deadhead movements are accounted for in the design, additional infrastructure would not be required. The exact slots for deadhead movements on the two passenger tracks will be developed and coordinated with BNSF and other operators as the design progresses to later stages.

23.25.6 3175

The commenter refers to Chapter 2, Alternatives, of the Draft EIR/EIS regarding the number of HSR trainsets that could be staged at the 26th Street light maintenance facility (LMF). The Authority has refined the LMF designs in the Final EIR/EIS as part of a value engineering effort, so that both the 26th Street LMF and the 15th Street LMF would be able to stage 20 trainsets in the yard and 10 trainsets in the shop, for a total of 30 trainsets. These revisions are included in Volume 3 of the Final EIR/EIS.

HSR movements in and out of the 26th Street LMF would occur between the LMF and Los Angeles Union Station along the San Bernardino Subdivision. HSR would enter the San Bernardino Subdivision at the Redondo Junction bridge, but would use the two southern approach tracks to travel to the 26th Street LMF (refer to Section 2.6.3.1, Alignment, of the Draft EIR/EIS). Within this segment, BNSF operates on the two northern tracks to access Hobart Yard, as well as to travel east to the Harbor Subdivision. Because HSR trains would operate independently of BNSF in this area on separate tracks, there would not be conflicts between HSR movements into the LMF and BNSF.

23.25.7 3176

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.

23.25.8 3177

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

As discussed in Section 3.2 of the Draft EIR/EIS, a detailed construction transportation plan would be developed as part of TR-IAMF#2, Construction Transportation Plan, which would detail the activities to be carried out in each construction phase, with the requirement of maintaining traffic flow. The Authority will also incorporate TR-IAMF#13, which commits the Authority to ongoing coordination with all stakeholders operating within the corridor to ensure that the design, construction, and operation of the project section do not adversely affect existing and planned rail services. Given the project's current level of design, the exact elements of project construction currently cannot be identified. To provide future engineers and contractors with an envelope of implementation flexibility while ensuring that all project impacts evaluated in the Draft EIR/EIS are avoided or reduced, the project includes impact avoidance and minimization features (IAMF) to address impacts during construction.

Regarding Attachment A, refer to responses to comments #3179 to 3322 below.

23.25.9 3178

The potential impacts related to the Hobart Yard modifications are evaluated in the Draft EIR/EIS, with mitigation measures proposed where required.

Regarding the operational health risk assessment associated with mitigation measure AQ-MM#4, Requirement of a Future Operational Health Risk Assessment, refer to the responses to comments #0541 and #0543 in Chapter 22, Responses to Comments from Local Agencies, Section 22.13, Response to Submission 013785 (Jivar Afshar, South Coast Air Quality Management District, Jan 30, 2026).

The commenter states that vibration mitigation measures must not affect freight operations. As described in Impact N&V-5 in Section 3.4, Noise and Vibration, most of the vibration impacts during operation would occur in Anaheim between Fullerton Junction and Anaheim Regional Transportation Intermodal Center, where BNSF does not operate. There would only be two areas within the Los Angeles – San Diego – San Luis Obispo Rail Corridor where operational vibration mitigation measures would be implemented, in Pico Rivera and Buena Park. N&V-MM#4, Implement Operational Vibration Mitigation Measures, will include measures such as vehicle suspension enhancements for HSR trains, ballast mats under the passenger rail tracks, or modifications to affected buildings. These would not be applied to any BNSF tracks or facilities and, therefore, would not interfere with freight operations.

The commenter states that the Authority must take responsibility for contamination encountered during utility relocation. Impact HMW-1 in Section 3.10, Hazardous Materials and Wastes, discusses how construction would generate hazardous materials through excavation of contaminated soils; this would include track modifications in the existing right-of-way, as well as subsurface work such as utility relocation. Among the IAMFs that will be incorporated to avoid or reduce potential impacts, HMW-IAMF#7, Storage and Transport of Materials, requires the Authority-designated contractor to comply with all applicable regulations regarding the identification, generation, transport, storage, and disposal of materials deemed hazardous by the State of California.

Encountering or disturbing previously undocumented or unknown hazardous materials or contamination during construction, trenching, and other ground-disturbing activities is also identified in Impact HMW-3. To address such contamination, the Authority will develop a soil management plan with requirements for the contractor to develop a Construction Management Plan prior to construction that includes provisions for responding to the disturbance of known, suspected, and unanticipated contamination (HMW-IAMF#4, Known, Suspected, and Unanticipated Environmental Contamination). Additional features include compliance with regulations that control the transport, use, storage, and disposal of hazardous materials (HMW-IAMF#7) as discussed above. To the extent that this comment suggests that the Authority take legal or financial responsibility for legacy contamination under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) or equivalent state laws, the Authority explicitly declines to accept this type of liability as part of the CEQA/NEPA process. Any CERCLA claims or legal responsibility for legacy contamination will be addressed, if necessary, through separate channels and according to applicable laws.

23.25.10 3179

Dispatching responsibilities would be similar to current responsibilities. Operating agreements with all parties will be finalized as the design progresses. The proposed design and operations generally assume that two mainline tracks would be dedicated for freight operations and the other two would be electrified and primarily used for passenger/HSR operation. As described in Section 3.2 of the Draft EIR/EIS, Impact TR-15, there would be sufficient capacity to allow for one freight train per hour per direction on the electrified tracks, but only during certain windows in peak hours in the morning and evening. Freight trains would be able to operate with fewer restrictions outside peak hours. BNSF would also have access to the electrified tracks in emergency situations. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.11 3180

The HSR trainsets will operate on an OCS, not battery. Refer to Volume 3.1, sheet TT-B3001, for typical cross sections with OCS included. Refer to response to comment #3173 for a description of the minimum heights of the OCS over freight tracks, which are based on the Authority's 2025 Design Criteria Manual Revision 7.0, Chapter 23. These vertical clearances allow BNSF trains, including double-stacked cars, to operate under the wire while the OCS is activated, similar to the Northeast

Corridor with Acela and the San Francisco to San Jose corridor with Caltrain. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.12 3181

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

23.25.13 3182

One-way low-speed diamond crossings will be installed at all track crossings along the alignment used by HSR, as described throughout Section 2.6.3, Shared Passenger Track Alternative A, of the Draft EIR/EIS and also presented throughout the PEPD. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.14 3183

The Commerce Flyover has been designed for Cooper E-80 loading. The proposed grades on the western and eastern ends of the flyover are 2.0 percent and 2.5 percent, respectively, which can be used by freight trains. However, the purpose of the flyover is to separate conflicting freight movements into Commerce Yard from passenger rail trains, and the operational assumption in this area is that freight trains would remain on the at-grade tracks. The transmission wires in this area are proposed to be raised, which is included within the design and the analysis of utility conflicts in Section 3.6, Public Utilities and Energy, of the Draft EIR/EIS. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.15 3184

The Authority's design criteria allow for double-stacked freight cars to operate under the OCS wires. Refer to the Authority's 2025 Design Criteria Manual Revision 7.0, Chapter 23 for vertical clearance requirements for HSR and commuter rail corridors. Refer to Volume 3.1, sheet TT-B3001 for cross sections of the proposed wire heights over the freight tracks; note 4 on the sheet provides additional explanation.

23.25.16 3185

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 BNSF on design variances as needed as the designs progress. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.17 3186

The Authority collaborated with BNSF on the design for the Commerce Flyover, and shared the 15 percent PEPD designs for the flyover with BNSF. Subsequently, BNSF developed more advanced design plans for the flyover, including a 90 percent design package, which the Authority reviewed in 2022. The BNSF 90 percent plans were essentially the same as the Authority's PEPD plans and included the same design for the main and lead tracks. Both BNSF's and the Authority's plans include a four-track railroad on the eastern and western ends of the Commerce Flyover.

The commenter asserts that BNSF cannot operate using one main track and one lead track on the east of Hobart/Commerce Yard, but this is an incorrect statement about the project. The Authority's design provides BNSF with two mainline tracks between Atlantic Avenue and Greenwood Avenue, as well as new lead tracks on either side of Hobart Yard, per a previous BNSF request. As described above, this is also consistent with BNSF's own 90 percent plans. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.18 3187

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.

23.25.19 3188

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.

The commenter raises questions about the trackwork between U.S. Highway 101 and First Street. As discussed in Section 2.6.2.1, Relationship to Surrounding High-Speed Rail Projects, of the Draft EIR/EIS, all trackwork within this segment is part of Los Angeles County Metropolitan Transportation Authority's (Metro) Link Union Station Project. The Authority is only responsible for building the OCS over the tracks, which would be completed prior to HSR implementation. BNSF operations on this segment of track would be coordinated with Metro.

23.25.20 3189

BNSF will still have access to the West Bank under the OCS wires to service the City of Los Angeles Department of Water and Power spur. Note that all BNSF storage tracks along the West Bank that are affected by the project will be relocated to the proposed consolidated storage area next to the existing Hobart Intermodal Yard; refer to Section 2.6.3.5, Freight or Passenger Railroad Modifications, of the Draft EIR/EIS for a detailed description of the relocated storage and staging tracks, which is also depicted on Figure 2-62.

23.25.21 3190

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.

23.25.22 3191

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.

23.25.23 3192

BNSF will be able to access industries under the OCS wires. Dispatching responsibilities are envisioned to remain the same as today.

23.25.24 3193

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.

23.25.25 3194

The existing Union Pacific Railroad transfer lead does not connect to the inbound lead, and the Authority's design in this area maintains the existing condition. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.26 3195

At this 15 percent level of design, the Authority has used Southern California Regional Rail Authority track standards as well as BNSF mainline standards, which follow the most recent American Railway Engineering and Maintenance-of-Way Association curve vertical standards. As the designs progress and top-of-rail elevation surveys are obtained, the vertical curves will be designed to the required and applicable standards. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.27 3196

Proposed modifications of existing grade-separation designs generally match the existing vertical clearances. As the design advances, the requirement for a sacrificial beam will be determined and

incorporated into the design if required. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.28 3197

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.

23.25.29 3198

The commenter refers to only a single lead track being provided at Hobart Yard, which is incorrect. Refer to response to comment #3186 above. The Authority will continue to coordinate with BNSF as the design advances.

23.25.30 3199

The comment correctly states the operations at the Union Pacific Railroad San Pedro Sub Connector. It is assumed that BNSF will have dispatching authority of all of its mainline tracks.

23.25.31 3200

Refer to response to comment #3195 above.

23.25.32 3201

Refer to response to comment #3195 above.

23.25.33 3202

Refer to response to comment #3195 above.

23.25.34 3203

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.

23.25.35 3204

Refer to response to comment #3195 above.

23.25.36 3205

Refer to response to comment #3196 above.

23.25.37 3206

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.

23.25.38 3207

Horizontal clearances to columns at the two yard connectors that cross under the flyover are 12 feet. Refer to Volume 3.1, sheet TT-D3006 for the horizontal clearances to columns.

23.25.39 3208

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 in later phases of design to refine this track alignment in greater detail.

23.25.40 3209

Refer to response to comment #3195 above.

23.25.41 3210

Grades of 2.0 percent or more were used on the Commerce Flyover to minimize right-of-way and environmental impacts. The Commerce Flyover has been designed for Cooper E-80 loading.

However, the purpose of the flyover is to separate conflicting freight movements into the Commerce Yard from passenger rail trains, and the operational assumption in this area is that freight trains would remain on the at-grade tracks. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.42 3211

Refer to response to comment #3195 above.

23.25.43 3212

Refer to response to comment #3196 above.

23.25.44 3213

The horizontal clearances between track centerlines and proposed aerial structure columns are a minimum of 12 feet; refer to Volume 3.2 of the PEPD for more details.

23.25.45 3214

Refer to response to comment #3195 above.

23.25.46 3215

Refer to response to comment #3207 above.

23.25.47 3216

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.

23.25.48 3217

Refer to response to comment #3195 above.

23.25.49 3218

Refer to response to comment #3210 above.

23.25.50 3219

Refer to response to comment #3186 above.

23.25.51 3220

BNSF has proposed improvements in this area in its Commerce Yard Planning and Analysis Plans (2017). The Authority has collaborated with BNSF on the designs and incorporated them into the PEPD. Siding/staging track 7600-5100 would be replaced by the two new proposed BNSF yard tracks 4501/4502 adjacent to Commerce Yard.

23.25.52 3221

Refer to response to comment #3220 above.

23.25.53 3222

Refer to response to comment #3195 above.

23.25.54 3223

Refer to response to comment #3196 above.

23.25.55 3224

Refer to response to comment #3195 above.

23.25.56 3225

Refer to response to comment #3196 above.

23.25.57 3226

Refer to response to comment #3195 above.

23.25.58 3227

Refer to response to comment #3195 above.

23.25.59 3228

At the time of design, the industrial lead tracks 7600-5133 and 7600-5150 appeared to no longer be in service. The Authority will work with BNSF in later phases of design to further assess the removal of these tracks.

23.25.60 3229

Refer to response to comment #3195 above.

23.25.61 3230

The project is currently at 15 percent level of design, and the proposed trackwork is appropriate for this level of design. The final location of all proposed mainline turnouts, crossovers, and interlockings will be developed in future phases of design in close coordination with BNSF.

23.25.62 3231

Refer to response to comment #3230 above.

23.25.63 3232

Approximately 90,940 track feet of BNSF storage and staging tracks would be removed along the corridor to accommodate the HSR project, including the tracks at the location referred to in this comment. This affected BNSF infrastructure would be replaced in a new consolidated storage area adjacent to Hobart Yard. As described in Section 2.6.3.5 of the Draft EIR/EIS, this new consolidated storage area would include enough tracks to replace all affected BNSF storage tracks.

23.25.64 3233

Refer to response to comment #3195 above.

23.25.65 3234

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.

23.25.66 3235

Refer to response to comment #3195 above.

23.25.67 3236

Refer to response to comment #3232 above.

23.25.68 3237

Refer to response to comment #3196 above.

23.25.69 3238

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.

23.25.70 3239

Refer to response to comment #3195 above.

23.25.71 3240

Refer to response to comment #3196 above.

23.25.72 3241

Refer to response to comment #3195 above.

23.25.73 3242

Refer to response to comment #3195 above.

23.25.74 3243

Refer to response to comment #3195 above.

23.25.75 3244

Refer to response to comment #3196 above.

23.25.76 3245

Refer to response to comment #3195 above.

23.25.77 3246

Refer to response to comment #3196 above.

23.25.78 3247

Refer to response to comment #3195 above.

23.25.79 3248

Refer to response to comment #3195 above.

23.25.80 3249

Refer to response to comment #3196 above.

23.25.81 3250

Refer to response to comment #3195 above.

23.25.82 3251

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.

23.25.83 3252

Refer to response to comment #3230 above.

23.25.84 3253

Refer to response to comment #3195 above.

23.25.85 3254

Refer to response to comment #3196 above.

23.25.86 3255

Refer to response to comment #3230 above.

23.25.87 3256

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.

23.25.88 3257

The project is currently at 15 percent level of design, and the proposed trackwork is appropriate for this level of design. The requested profile information will be included in future design plans.

23.25.89 3258

Refer to response to comment #3195 above.

23.25.90 3259

Refer to response to comment #3195 above.

23.25.91 3260

Refer to response to comment #3195 above.

23.25.92 3261

Refer to response to comment #3210 above.

23.25.93 3262

Refer to response to comment #3195 above.

23.25.94 3263

Refer to response to comment #3195 above.

23.25.95 3264

Refer to response to comment #3210 above.

23.25.96 3265

Refer to response to comment #3195 above.

23.25.97 3266

Refer to response to comment #3230 above.

23.25.98 3267

Refer to response to comment #3230 above.

23.25.99 3268

Refer to response to comment #3196 above.

23.25.100 3269

Refer to response to comment #3230 above.

23.25.101 3270

Refer to response to comment #3195 above.

23.25.102 3271

Refer to response to comment #3230 above.

23.25.103 3272

Refer to response to comment #3195 above.

23.25.104 3273

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.

23.25.105 3274

Refer to response to comment #3196 above.

23.25.106 3275

Refer to response to comment #3230 above.

23.25.107 3276

Refer to response to comment #3195 above.

23.25.108 3277

Refer to response to comment #3195 above.

23.25.109 3278

Refer to response to comment #3185 above.

23.25.110 3279

The design change was previously requested by BNSF, and the Authority has already included it in the Draft EIR/EIS. Refer to Volume 3.1, sheet TT-D1578, of the PEPD for the turnout.

23.25.111 3280

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.

23.25.112 3281

Refer to response to comment #3195 above.

23.25.113 3282

Refer to response to comment #3195 above.

23.25.114 3283

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.

23.25.115 3284

Proposed modifications of existing grade-separation designs generally match the existing vertical clearances. As the design advances, the Authority will coordinate with BNSF on design variances as needed. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.116 3285

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.

23.25.117 3286

Refer to response to comment #3196 above.

23.25.118 3287

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.

23.25.119 3288

Refer to response to comment #3195 above.

23.25.120 3289

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.

23.25.121 3290

Refer to response to comment #3230 above.

23.25.122 3291

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.

23.25.123 3292

Refer to response to comment #3196 above.

23.25.124 3293

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.

23.25.125 3294

Refer to response to comment #3230 above.

23.25.126 3295

Refer to response to comment #3232 above.

23.25.127 3296

Refer to response to comment #3196 above.

23.25.128 3297

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.

23.25.129 3298

Refer to response to comment #3195 above.

23.25.130 3299

Refer to response to comment #3195 above.

23.25.131 3300

Refer to response to comment #3196 above.

23.25.132 3301

Refer to response to comment #3230 above.

23.25.133 3302

Refer to response to comment #3195 above.

23.25.134 3303

Refer to response to comment #3195 above.

23.25.135 3304

Refer to response to comment #3195 above.

23.25.136 3305

There would not be an impact on freight operations traveling on to the Orange Subdivision, because the HSR project would maintain all track connections to the Orange Subdivision for existing freight operations.

23.25.137 3306

The project is at 15 percent level of design, and the track design was closely coordinated with BNSF. The proposed alignment maintains access to all tracks, including the aerial structures. The final location of all proposed mainline turnouts, crossovers, and interlockings will be developed in future phases of design in close coordination with BNSF.

23.25.138 3307

Maintenance and cost responsibilities have not yet been determined. The Authority will continue to coordinate with all operators along the corridor on a new shared use agreement.

23.25.139 3308

Unless otherwise indicated in Volume 3 of the Draft EIR/EIS, access to industry spurs has been maintained throughout the corridor. Some industry leads are located off the passenger tracks in the existing condition, and the project maintains these leads. These would continue to operate as they do today.

23.25.140 3309

Refer to response to comment #3230 above.

23.25.141 3310

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. However, BNSF will have access to the passenger tracks in emergency situations. Section 3.2.6, Environmental Consequences, Impact TR-15 describes how operational analysis was conducted to demonstrate that freight and passenger volumes could be maintained within the corridor. Freight trains could operate one train per hour per direction on the electrified tracks, with no effect on overall operations within the corridor. No revisions have been made to the Draft EIR/EIS in response to this comment.

23.25.142 3311

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

23.25.143 3312

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

23.25.144 3313

The commenter points out a typographical error on the sheet. 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.” Refer to Volume 3 of the Final EIR/EIS for the revised sheets.

23.25.145 3314

The Authority will coordinate with BNSF on the diamond crossings in future phases of design.

23.25.146 3315

Regarding the Commerce Flyover design, refer to response to comment #3186 above. Regarding crossovers, refer to comment #3230 above.

23.25.147 3316

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.

23.25.148 3317

The previously proposed maintenance-of-way spur east of Commonwealth Avenue was removed, because the parcel has recently been developed with a new residential development. The spur has been relocated to east of Lemon Street, depicted in Volume 3.1, sheet TT-D1600.

23.25.149 3318

The commenter is correct that the maintenance-of-way spur replaces the existing maintenance-of-way spur on the west side of the right-of-way just east of Highland Avenue. Refer to response to comment #3317 above.

23.25.150 3319

The proposed right-of-way in the PEPD is sufficient for the current level of design and includes space for all necessary access points.

23.25.151 3320

The commenter requests information on maintenance access spacing between MT2 and MT4. Because these two tracks are not adjacent to each other, the Authority assumes the commenter is referring to spacing between MT3 and MT4 (the proposed new fourth mainline track). Appropriate track spacing would be provided between all new and relocated tracks, consistent with BNSF standards. Therefore, the proposed PEPD design would not preclude or affect how BNSF currently gains access to its right-of-way or maintains its tracks.

23.25.152 3321

Refer to response to comment #3319 above.

23.25.153 3322

The Draft EIR/EIS has identified all right-of-way needs to build and operate the project at a 15 percent design level. If, in later phases of design, additional or modified improvements are deemed necessary that require improvements outside of the scope or footprint evaluated in the EIR/EIS, the Authority will work with BNSF to determine if additional environmental review is needed in accordance with CEQA and NEPA requirements.

23.25.154 3323

Refer to Standard Response LAA-Response-GENERAL-03: Funding and Project Costs, in Chapter 18.

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

The commenter included this letter dated October 2, 2022, as a reference to comment #3169. This attached letter does not represent additional individual comments received on the Draft EIR/EIS. Refer to response to comment #3169 above.

23.25.155 3324

As described in Section S.6, Impact Avoidance and Minimization Features, of the Draft EIR/EIS, the Authority has committed to integrating programmatic IAMFs consistent with the (1) 2005 *Final Program Environmental Impact Report/Environmental Impact Statement for the Proposed California High-Speed Train System*, (2) 2008 *Bay Area to Central Valley High-Speed Train (HST) Program Environmental Impact Report/Environmental Impact Statement (EIR/EIS)*, and (3) 2012 *Bay Area to Central Valley High-Speed Train Partially Revised Final Program Environmental Impact Report* into the HSR project. IAMFs are project features (such as standard engineering practices, adherence to

legal requirements, and specific training for construction workers) that have been incorporated into the design of an alternative to avoid or minimize impacts. Some of these programmatic measures have been modified for incorporation into the Shared Passenger Track Alternatives along with project section–specific design considerations. As explained throughout Chapter 3, Affected Environment, Environmental Consequences, and Mitigation Measures, of the Draft EIR/EIS, IAMFs are applied to avoid or reduce adverse impacts resulting from construction or operation of the project for each environmental resource that was analyzed. The Authority has reviewed BNSF's individual comments on the IAMFs and acknowledges that future coordination will be conducted around the contract mechanisms; the Authority would either reimburse BNSF for completion of the IAMFs included in the project for BNSF-led construction components or would complete the IAMFs on behalf of BNSF. Section 3.2 of the Draft EIR/EIS includes TR-IAMF#13, which commits the Authority to future coordination with rail operators to ensure construction and operation of the HSR project does not affect rail operations. TR-IAMF#13 has been revised in the Final EIR/EIS to further clarify the outcomes of this coordination, which includes plans for cost sharing. Refer to Section 16.19 in Chapter 16 of the Final EIR/EIS for these revisions.

As noted in Section 3.3.4.3, Impact Avoidance and Minimization Features, of the Draft EIR/EIS, the Authority did not apply the following air quality IAMFs to the BNSF-led construction components of the project: 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. Appendix 2-A, Impact Avoidance and Minimization Features, of the Draft EIR/EIS contains the full descriptions of AQ-IAMF#3, AQ-IAMF#4, and AQ-IAMF#5, which also acknowledge they would not be applied to BNSF construction.

Los Angeles to Anaheim - RECORD #013852 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Business and/or Organization
Full Name:	Don Paul

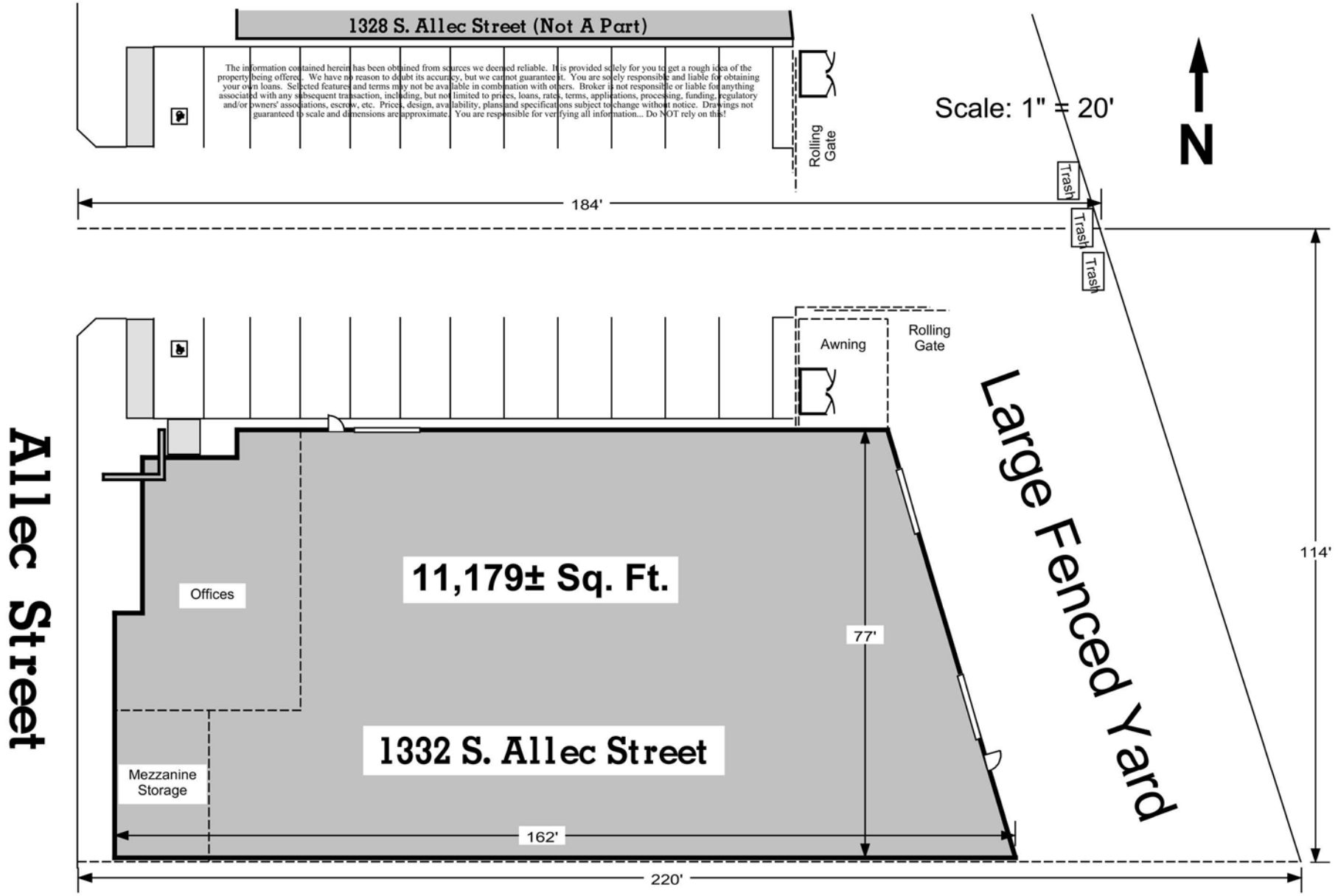
Stakeholder Comments/Issues:

0845 I am SERIOUSLY concerned with the proposed taking of part of our industrial investment property at 1332 S. Allec Street in Anaheim for the following reasons: 1) Our property will lose almost HALF its parking !!! These buildings were built for MANUFACTURING which require 2:1 parking (2 parking spaces per 1,000 SF of building). This will result in our powder coating (MANUFACTRING) tenant of 24 YEARS from LEAVING our property... and leaving us with a TERRIBLY under parked industrial building. 2) Our 1977 built building only has 14' ceiling clearance... WAY too low for DISTRIBUTION tenants who could possibly live with HALF our original parking. DISTRIBUTION tenants also need a truck well or dock... which there is no room for with the

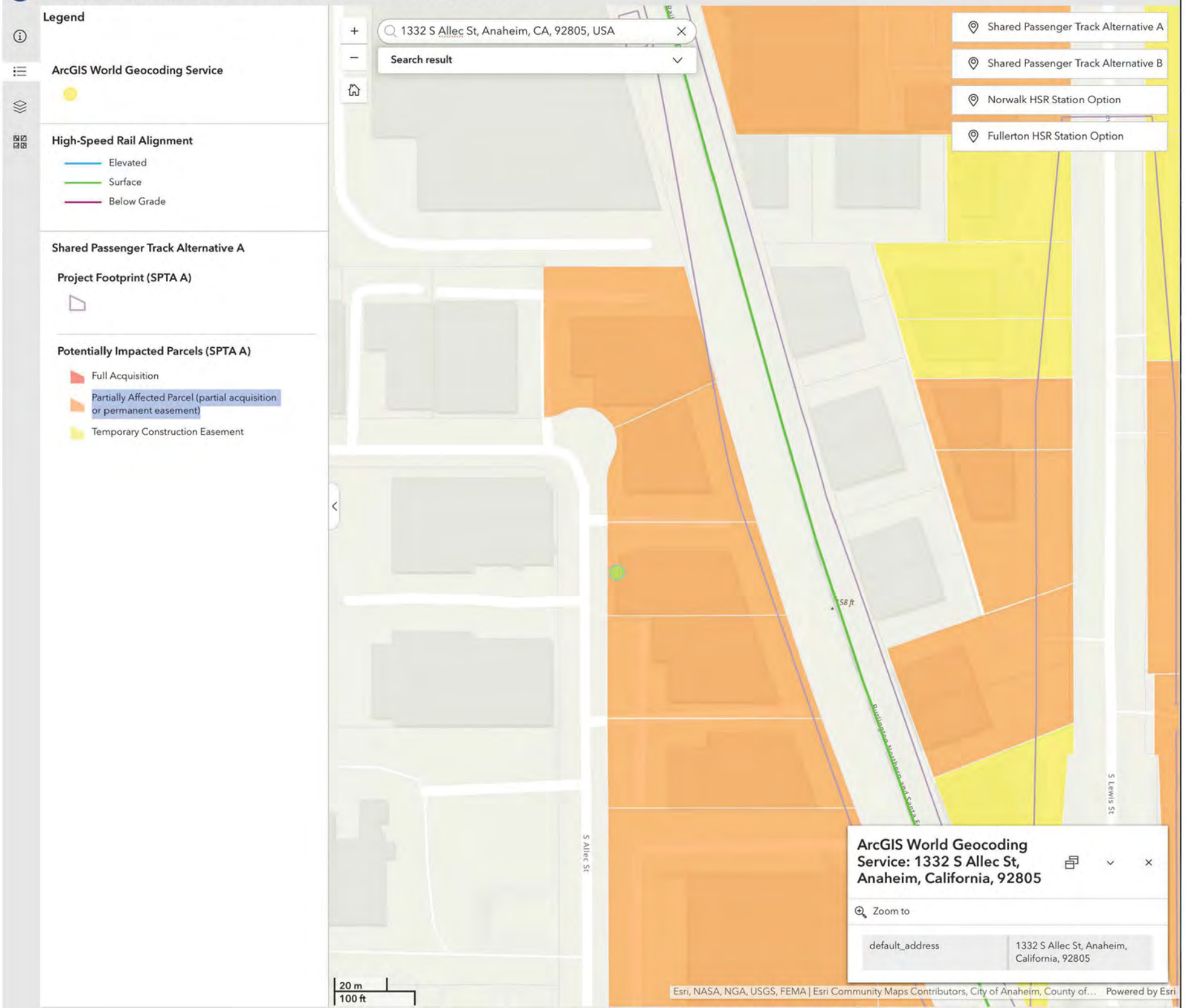
0846 LARGE truck turning areas truck wells require. 3) The surrounding neighborhood got a homeless shelter a few years ago which coincidentally increased the break-ins, vandalism and thefts. They've CUT THROUGH both chain link AND wrought iron fences repeatedly. HOW does CA HRS proposed to prevent these homeless and criminals from breaking into your MULTI-MILLION HRS trains you proposed to park where these criminals

0847 are ALREADY breaking in and camping out ??? 4) If CA HRS proceeds for your proposed "partial" taking of our $4 MILLION property, this will make our 2:1 parked MANUFACTURING building "FUNCTIONALLY OBSOLETE" requiring a COMPLETE "taking" with costly and time consuming litigation... AND paying to relocate our powder coating tenant which will likely cost at LEAST another $2 MILLION since their AQMD permits take LONG time to acquire, require HRS to buy them NEW powder coating equipment meeting TODAY's challenging AQMD restrictions. AND several months for them to install their equipment. 5) Buying out industrial investment property will dramatically INCREASE OUR REPLACEMENT PROPERTY TAXES which DRAMATICALLY lowers our Net Rental Income FOREVER since our 2002 Assessed Value is only ~ 1/4th of today's property values. HRS would also have to pay for our property tax increases for LIFE. 6) HRS will have the SAME issues with all the other industrial properties backing up to HSR's railway. This is ESPECIALLY frustrating for our family since this property provides my RETIREMENT INCOME. PLEASE eliminate the "taking" / "encroachment" on ALL the properties on Allec Street in Anaheim. It is the COST

0848 EFFECTIVE thing to do since HSR lost it's federal funding... AND there is actually NO "HIGH SPEED RAIL" from L.A. to Anaheim ARCOT !!! Passengers choosing to go past L.A. can simply use MetroLink !!!


1328 S. Allec Street (Not A Part)
The information contained herein has been obtained from sources we deemed reliable. It is provided solely for you to get a rough idea of the property being offered. We have no reason to doubt its accuracy, but we cannot guarantee it. You are solely responsible and liable for obtaining your own loans. Selected features and terms may not be available in combination with others. Broker is not responsible or liable for anything associated with any subsequent transaction, including, but not limited to prices, loans, rates, terms, applications, processing, funding, regulatory and/or owners' associations, escrow, etc. Prices, design, availability, plans and specifications subject to change without notice. Drawings not guaranteed to scale and dimensions are approximate. You are responsible for verifying all information... Do NOT rely on this!
Rolling Gate
Scale: 1" = 20'
N
184'
Trash
Trash
Trash
Awning
Rolling Gate
Large Fenced Yard
114'
Allec Street
11,179± Sq. Ft.
Offices
77'
1332 S. Allec Street
Mezzanine Storage
162'
220'

California High-Speed Rail: Los Angeles to Anaheim Project Section




1332

23.26 Response to Submission 013852 (Don Paul, Beta Allec Two LLC, Feb 3, 2026)

23.26.1 0845

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

For Assessor's Parcel Number 082-140-31 (1332 S Allec Street), the project would require the permanent acquisition of approximately 2,242 square feet of a 23,035-square-foot parcel, located along the eastern edge of the property; refer to Volume 3.1, Part 2, sheet RW-M1617 of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) for details on the proposed partial acquisition.

The affected area consists primarily of a surface parking lot and enough of the surface lot would remain available for continued use by the businesses on the site. Detailed site-specific design, including final parking configuration and circulation, would be evaluated during subsequent project phases. The California High-Speed Rail Authority (Authority) has determined at this time that a full acquisition is not needed, but would support any displaced business owners with relocation assistance. As described in Section 3.12, Socioeconomics and Communities, of the Draft EIR/EIS, the Authority would incorporate SOCIO-IAMF#3, Relocation Implementation Plan, to 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.

23.26.2 0846

This comment is a duplicate of Submission 013853. Refer to Section 23.27, Response to Submission 013853 (Don Paul, Beta Allec Two LLC, Feb 3, 2026), in this chapter. Specifically, please refer to response to comment #0801 in Section 23.27.

23.26.3 0847

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.

Refer to response to comment #0845.

23.26.4 0848

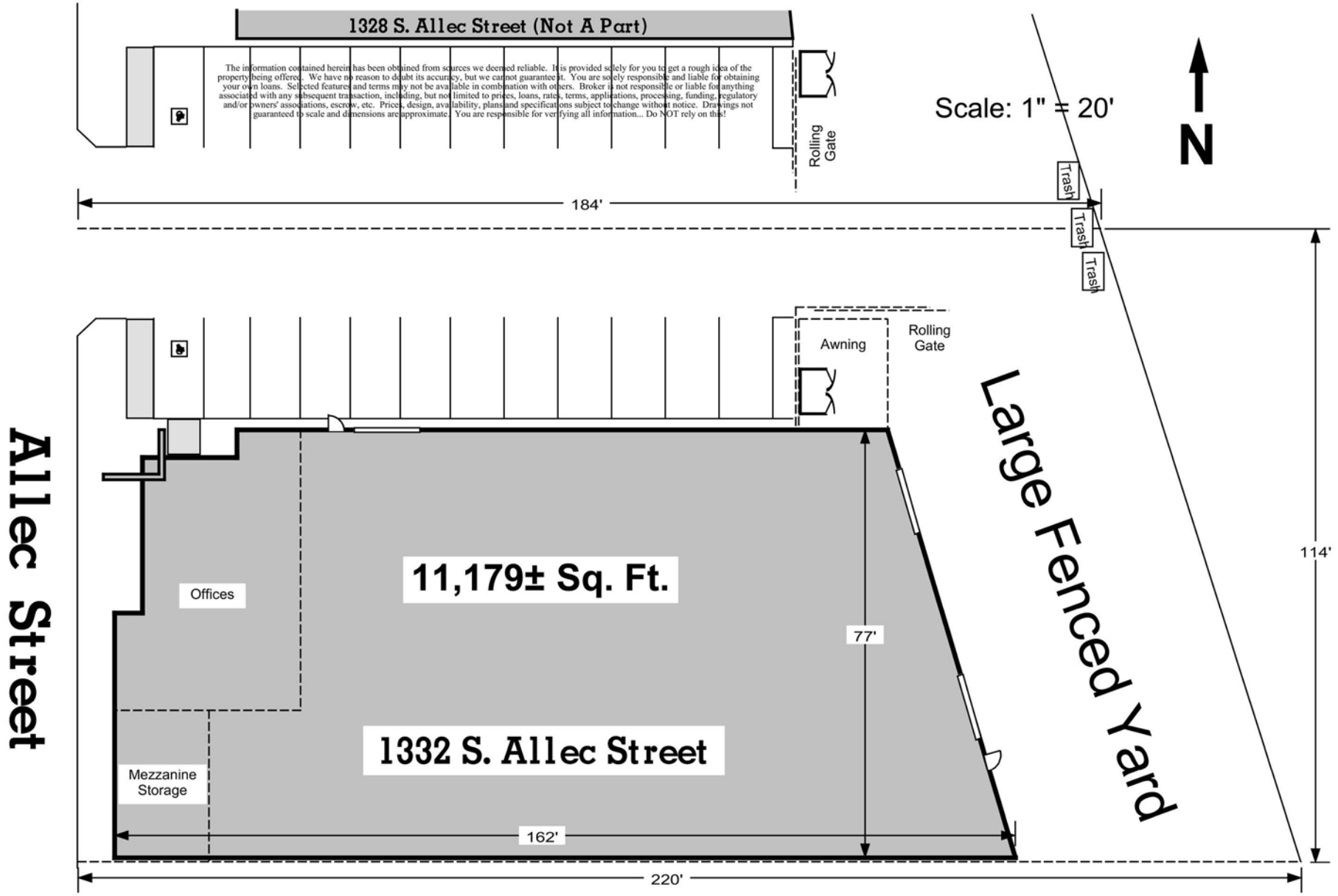
Refer to Standard Response LAA-Response-Chapter 1 P&N-01: Project Benefits, in Chapter 18.

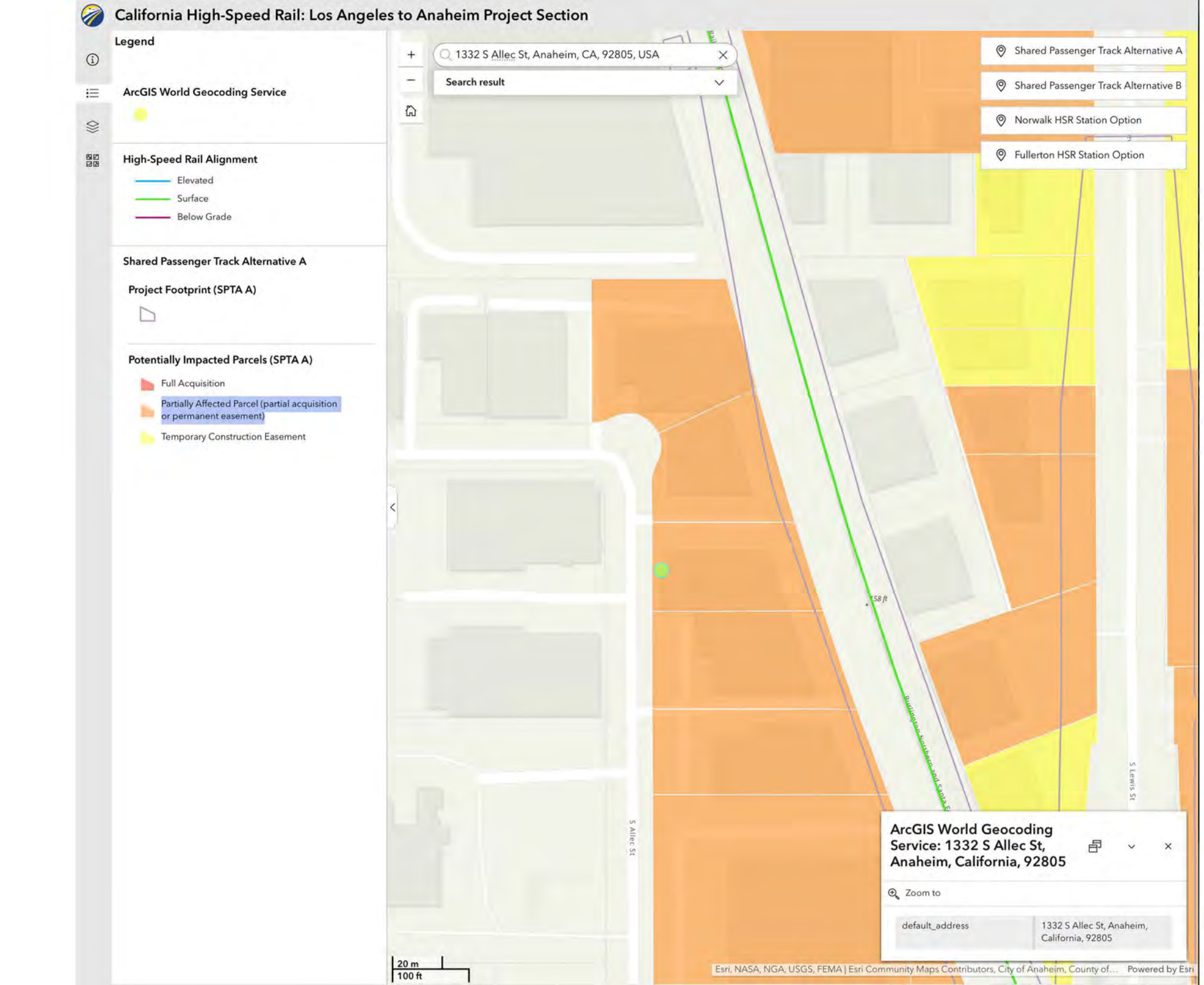
Los Angeles to Anaheim - RECORD #013853 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Business and/or Organization
Full Name:	Don Paul

Stakeholder Comments/Issues:

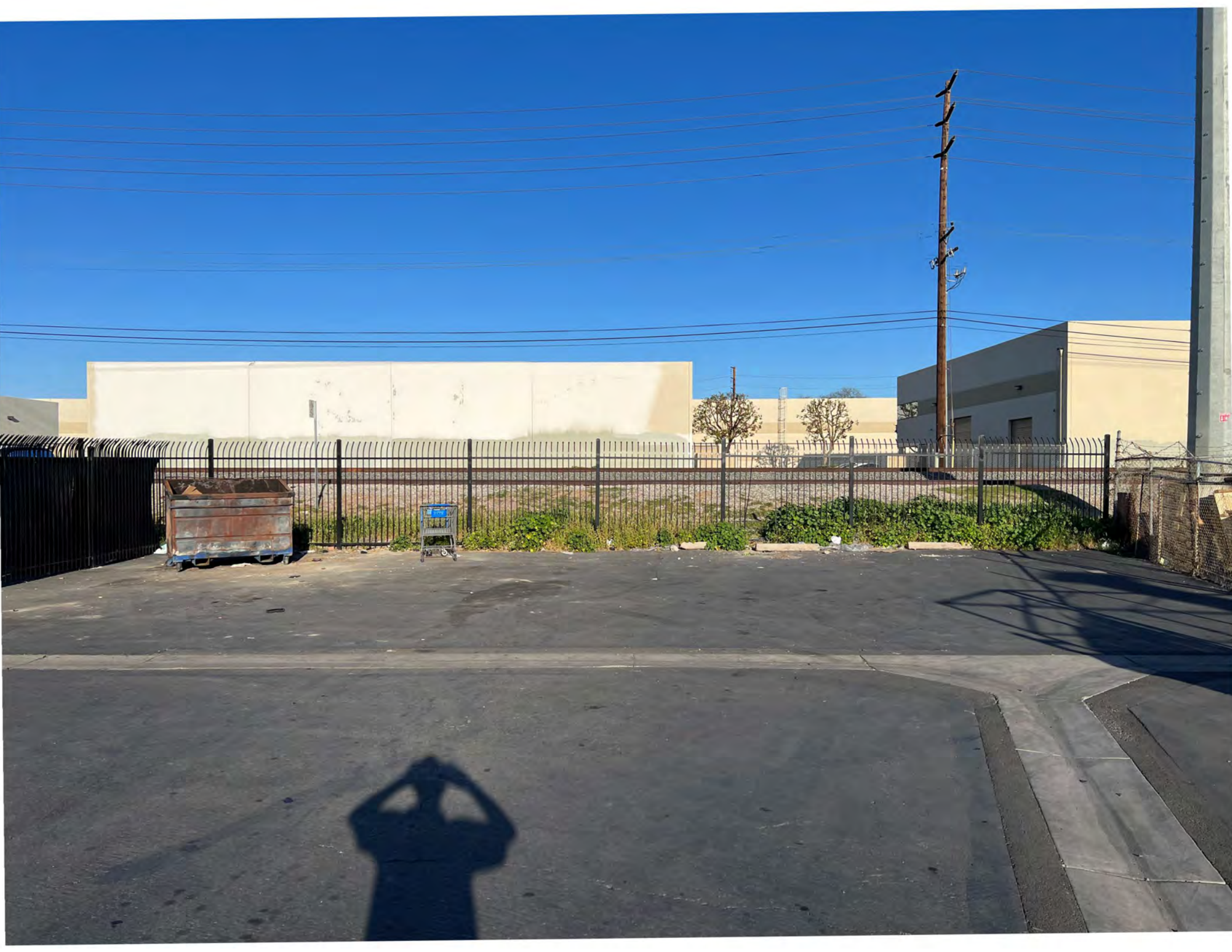
0800 I am SERIOUSLY concerned with the proposed taking of part of our industrial investment property at 1332 S. Allec Street in Anaheim for the following reasons: 1) Our property will lose almost HALF its parking !!! These buildings were built for MANUFACTURING which require 2:1 parking (2 parking spaces per 1,000 SF of building). This will result in our powder coating (MANUFACTRING) tenant of 24 YEARS from LEAVING our property... and leaving us with a TERRIBLY under parked industrial building. 2) Our 1977 built building only has 14' ceiling clearance... WAY too low for DISTRIBUTION tenants who could possibly live with HALF our original parking. DISTRIBUTION tenants also need a truck well or dock... which there is no room for with the
0801 LARGE truck turning areas truck wells require. 3) The surrounding neighborhood got a homeless shelter a few years ago which coincidentally increased the break-ins, vandalism and thefts. They've CUT THROUGH both chain link AND wrought iron fences repeatedly. HOW does CA HRS proposed to prevent these homeless and criminals from breaking into your MULTI-MILLION HRS trains you proposed to park where these criminals
0802 are ALREADY breaking in and camping out ??? 4) If CA HRS proceeds for your proposed "partial" taking of our $4 MILLION property, this will make our 2:1 parked MANUFACTURING building "FUNCTIONALLY OBSOLETE" requiring a COMPLETE "taking" with costly and time consuming litigation... AND paying to relocate our powder coating tenant which will likely cost at LEAST another $2 MILLION since their AQMD permits take LONG time to acquire, require HRS to buy them NEW powder coating equipment meeting TODAY's challenging AQMD restrictions. AND several months for them to install their equipment. 5) Buying out industrial investment property will dramatically INCREASE OUR REPLACEMENT PROPERTY TAXES which DRAMATICALLY lowers our Net Rental Income FOREVER since our 2002 Assessed Value is only ~ 1/4th of today's property values. HRS would also have to pay for our property tax increases for LIFE. 6) HRS will have the SAME issues with all the other industrial properties backing up to HSR's railway. This is ESPECIALLY frustrating for our family since this property provides my RETIREMENT INCOME. PLEASE eliminate the "taking" / "encroachment" on ALL the properties on Allec Street in Anaheim. It is the COST
0803 EFFECTIVE thing to do since HSR lost its federal funding. LASTLY, there is actually NO "HIGH SPEED RAIL" from L.A. to Anaheim ARCOT !!! Passengers choosing to go past L.A. can simply use MetroLink !!! STOP the WASTE investing in a "HIGH SPEED RAIL" extension from L.A. to Anaheim. There are literally HUNDREDS of flights and bus trips that handle this ALREADY… CHEAPER and FASTER than "HIGH SPEED RAIL" !!! Don Paul, MBA Managing Member Beta Allec Two LLC


1328 S. Allec Street (Not A Part)
The information contained herein has been obtained from sources we deemed reliable. It is provided solely for you to get a rough idea of the property being offered. We have no reason to doubt its accuracy, but we cannot guarantee it. You are solely responsible and liable for obtaining your own loans. Selected features and terms may not be available in combination with others. Broker is not responsible or liable for anything associated with any subsequent transaction, including, but not limited to prices, loans, rates, terms, applications, processing, funding, regulatory and/or owners' associations, escrow, etc. Prices, design, availability, plans and specifications subject to change without notice. Drawings not guaranteed to scale and dimensions are approximate. You are responsible for verifying all information... Do NOT rely on this!
Rolling Gate
Scale: 1" = 20'
N
184'
Trash
Trash
Trash
Awning
Rolling Gate
Large Fenced Yard
114'
Allec Street
11,179± Sq. Ft.
Offices
77'
1332 S. Allec Street
Mezzanine Storage
162'
220'


California High-Speed Rail: Los Angeles to Anaheim Project Section
Legend
ArcGIS World Geocoding Service
High-Speed Rail Alignment
Elevated
Surface
Below Grade
Shared Passenger Track Alternative A
Project Footprint (SPTA A)
Potentially Impacted Parcels (SPTA A)
Full Acquisition
Partially Affected Parcel (partial acquisition or permanent easement)
Temporary Construction Easement
1332 S Allec St, Anaheim, CA, 92805, USA
Search result
Shared Passenger Track Alternative A
Shared Passenger Track Alternative B
Norwalk HSR Station Option
Fullerton HSR Station Option
ArcGIS World Geocoding Service: 1332 S Allec St, Anaheim, California, 92805
Zoom to
default_address
1332 S Allec St, Anaheim, California, 92805
S Allec St
S Lewis St
20 m
100 ft
Esri, NASA, NGA, USGS, FEMA | Esri Community Maps Contributors, City of Anaheim, County of... Powered by Esri




1332





23.27 Response to Submission 013853 (Don Paul, Beta Allec Two LLC, Feb 3, 2026)

23.27.1 0800

This comment is a duplicate of Submission 013852. Refer to Section 23.26, Response to Submission 013852 (Don Paul, Beta Allec Two LLC, Feb 3, 2026), in this chapter. Specifically, please refer to response to comment #0845 in Section 23.26.

23.27.2 0801

Safety and security, including protection of rail infrastructure and prevention of unauthorized access, are addressed in Draft Environmental Impact Report/Environmental Impact Statement Section 3.11, Safety and Security, which evaluates existing conditions, potential impacts, and operational security considerations associated with the project. High-speed rail facilities, including tracks, yards, and stored trainsets, would be designed and operated in accordance with established rail industry standards and would incorporate layered security measures such as controlled access points, fencing and physical barriers, lighting, surveillance systems, intrusion detection, and coordination with local law enforcement and transit police agencies. Train storage and operational areas would not be left unsecured, and security measures would be refined during final design in coordination with local jurisdictions and emergency service providers. Although broader community conditions such as homelessness and criminal activity are not caused by the project and are outside the California High-Speed Rail Authority's control, the project includes design and operational features intended to minimize trespass, vandalism, and unauthorized access and to protect public safety and critical infrastructure.

23.27.3 0802

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

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

This comment is a duplicate of Submission 013852. Please refer to responses to comments #0847 and #0845 in Section 23.26 in this chapter.

23.27.4 0803

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

Los Angeles to Anaheim - RECORD #013854 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Business and/or Organization
Full Name:	Chelsea Maclean

Stakeholder Comments/Issues:

To Whom It May Concern: On behalf of our client, Anaheim Real Estate Partners, LLC, please see the attached comment letter on the Draft EIR/EIS for the Los Angeles to Anaheim section of the High Speed Rail project. Thank you, Chelsea Maclean Chelsea Maclean | Holland & Knight Partner Holland & Knight LLP 560 Mission Street, Suite 1900 | San Francisco, California 94105 Phone +1.415.743.6979 | Fax +1.415.743.6910 chelsea.maclean@hklaw.com | www.hklaw.com _____ Add to address book | View professional biography NOTE: This e-mail is from a law firm, Holland & Knight LLP ("Holland & Knight"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of Holland & Knight, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to Holland & Knight in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of Holland & Knight, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

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February 3, 2026

Via E-mail: Los.Angeles_Anaheim@hsr.ca.gov

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

Re: **Los Angeles to Anaheim Draft EIR/EIS Comment - Comments Regarding Impacts to OCVIBE and Related AREP Interests (Anaheim, California)**

To Whom It May Concern:

1815

Holland & Knight LLP represents Anaheim Real Estate Partners, LLC ("AREP") and submits these comments on the California High-Speed Rail Authority's ("Authority") Draft EIR/EIS for the Los Angeles to Anaheim Project Section ("LA–A Project"). AREP is the owner, operator, and/or vested developer for properties and facilities within the OCVIBE project area in Anaheim, including City-approved public improvements, structured parking, and station-area interface improvements adjacent to the Anaheim Regional Transportation Intermodal Center ("ARTIC") and the LOSSAN Corridor.

OCVIBE is not a conceptual or speculative future land use. It is an approved, vested, and actively constructed mixed-use district with significant public benefit commitments and time-sensitive construction sequencing. As a result, the Draft EIR/EIS must (i) fully and accurately describe the existing conditions and approved entitlements in the ARTIC/OCVIBE station influence area; (ii) disclose acquisition and easement needs at a parcel/APN level; (iii) analyze construction-phase access, parking, curb management, and utility conflicts with OCVIBE's vested obligations; and (iv) commit to enforceable avoidance, coordination, and mitigation measures sufficient to ensure both projects can be delivered.

These comments are organized as follows:

1. OCVIBE Background, Entitlements, and Public Benefit Commitments
2. Draft EIR/EIS Project Description and Anaheim Land Requirement Issues

1815

3. Impacts to Specific AREP/OCVIBE Properties and Station-Area Operations
4. Requested Clarifications, Commitments, and Mitigation Measures
5. Requested Alternative Consistent with Shared Passenger Track Alternatives
6. Conclusion

AREP respectfully requests that the Authority place this letter and referenced attachments into the administrative record and respond with specific revisions and commitments in the Final EIR/EIS.

1816

1. OCVIBE Background, Entitlements, and Public Benefit Commitments

A. 2022 OCVIBE Approvals and Development Agreement

The OCVIBE Project was initially approved by the City of Anaheim ("City") in September 2022 to allow for a world-class mixed-use lifestyle, sports and entertainment district, and residential neighborhood on approximately 100 acres anchored by the existing Honda Center arena and the ARTIC transit hub. The 2022 approvals allowed for development of (among other components) up to 1,500 residential dwelling units, a 5,700-seat live performance theater, two hotels, park space/open space, office space, and related amenities and public infrastructure. The project is integrated with the rest of Anaheim by virtue of its location adjacent to State Route 57 and ARTIC and is intended to complement the Honda Center and nearby Angel Stadium.

The 2022 approvals[1] included Development Agreement No. DAG202-00004 (as later amended and restated), which vested development rights and established binding implementation obligations, including transit-interface improvements and parking obligations that directly relate to ARTIC operations.

B. 2024 Amendments: Housing and Program Adjustments

On October 29, 2024[2], the City Council unanimously approved entitlement amendments, including an Amended and Restated Development Agreement[3], to demolish existing office buildings and construct up to 750 additional residential units for a project total of approximately 1,960 to 2,250 units, including approximately 300–340 affordable units, and up to 325,000 square feet of office uses, along with other modifications to approximately 9 acres of parks and open spaces. These amendments recognized and delivered on the City's increasing need to

[1] Staff Report35442.pdf
[2] Staff Report43956.pdf
[3] Amended and Restated Development Agreement No. 2020-00004 (the "Development Agreement") was made and entered into as of November 4, 2022, by and between the City of Anaheim ("City") and Anaheim Real Estate Partners, LLC, TS Anaheim, LLC, and FCD, LLC (the "Owners") recorded in the Official Records of Orange County, California as Document No. 2024000332377.

1816 address the housing crisis and confirm that the OCVIBE approvals and obligations remain active and vested.

C. Public Benefits Exceeding $300 Million and Binding Implementation Obligations

OCVIBE provides substantial, bargained-for public benefits estimated to exceed $300,000,000, including:

- Public park improvements estimated at approximately $30 million;
- Affordable housing value estimated at approximately $55 million;
- Public infrastructure improvements estimated at approximately $80 million;
- Ongoing private maintenance obligations of public facilities estimated at approximately $30 million;
- A $6.75 million offsite park contribution fee;
- Construction and maintenance of an approximately 4.85-acre Meadow Park and approximately 4.7-acre Neighborhood Park;
- Payment of approximately $100 million in development impact fees;
- Significant ongoing economic impacts due to development, construction, and operation; and
- Production of both affordable and market-rate housing to support the City's Regional Housing Needs Assessment (RHNA) compliance obligations.

Because these benefits and improvements are tied to approved entitlements and construction sequencing, any HSR-related acquisition, staging, or access constraints that delay or impair OCVIBE implementation risks not only private investment but also the City's committed public benefits and public improvement delivery.

D. Active Construction and Time-Sensitive Delivery

Project construction is well underway and on track to bring approved plans to fruition. As reported in the October 29, 2024 staff report to the City Council, Phase 1 final site plans were approved in September 2022 and construction has been underway for multiple components, with permits issued for the street network and construction started on Katella Avenue, Stanley Cup Way, Douglass Road, and portions of River Road.

1816

Further, the July 22, 2025[4] City staff report documented significant construction progress, including:

Completed roadway infrastructure:
- River Road Phase I (Katella Avenue to Stanley Cup Way)
- Stanley Cup Way (River Road to Douglass Road)

Ongoing roadway infrastructure construction:
- Katella Avenue (State Route 57 to River Road)
- Douglass Road (Stanley Cup Way to Cerritos Avenue)
- River Road Phase II (Stanley Cup Way to BNSF Railway/UPRR)
- River Road Phase III (BNSF Railway/UPRR to Ball Road)

Ongoing site improvement construction:
- Market Hall (approximately 260,000 sf office/commercial building)
- Security Hub (approximately 12,500 sf security building)
- Concert Hall (approximately 5,613 capacity entertainment venue)
- Urban Park
- Parking Deck B (2,968 spaces)
- Parking Deck C (1,566 spaces)
- Parking Deck D (1,791 spaces)

Final site plans approved:
- Parking Deck A (1,840 spaces)
- South Plaza (approximately 320-room hotel, 46,000 sf commercial area, and outdoor plaza)
- Residential Phase I (532 units, including 35 affordable units)

Design/coordination underway with City:
- Meadow Park and modified ARTIC bus drop-off
- Katella Avenue Pedestrian Bridge
- Douglass Road Pedestrian Bridge

Additionally, construction on the residential neighborhood, SR-57 Off Ramps at Katella Ave. & Ball Road, the employee parking lot, Douglass Road South, and the two bridges are all scheduled to commence construction in 2026.

Much of this work is being expedited in part to support major planned events, including the 2028 Olympic Games. Accordingly, OCVIBE construction sequencing and access reliability are essential; disruption to parking replacement, bridges, roadway segments, and ARTIC interface elements can cause cascading delays and operational impacts.

[4] 46869.4.pdf

1817

2. Draft EIR/EIS Project Description and Anaheim Land Requirement Issues

The Draft EIR/EIS describes both temporary and permanent land requirements in Anaheim. It states that approximately 1.75 acres would be used temporarily for construction staging and related purposes, and that approximately 38.81 acres would be acquired and converted to transportation uses. The Draft EIR/EIS concludes these conversions would not alter land use patterns because affected and adjacent lands are generally similar in designation and because residential neighborhoods along the LOSSAN Corridor have historically been exposed to rail operations.

These acreage-level statements and generalized land use conclusions do not satisfy CEQA's informational and analytical requirements as applied to the ARTIC/OCVIBE station influence area, where:

- OCVIBE is a City-approved, vested, actively constructed project with binding public benefit and infrastructure delivery obligations;
- the Draft EIR/EIS itself identifies OCVIBE as a major planned development in the ARTIC station area, with portions under construction in 2025, and acknowledges that planned changes to the ARTIC site may affect station area investments; and
- parking, curb, and access functions at ARTIC are constrained by transit operations and by OCVIBE's approved public improvements and contractual obligations.

From AREP's perspective as a property owner/operator with vested development rights and ongoing construction, the Draft EIR/EIS is insufficient without:

1. parcel/APN-level disclosure of all acquisitions/easements and temporary construction uses affecting the ARTIC/OCVIBE interface;
2. identification of the specific property right needed (fee acquisition vs permanent easement vs temporary construction easement/lease);
3. quantification of access, parking, and curb impacts by construction phase; and
4. an enforceable avoidance and coordination strategy to prevent interference with OCVIBE entitlements, construction sequencing, transit customer parking obligations, and operating agreements.

1818

3. Impacts to Specific AREP/OCVIBE Properties and Station-Area Operations

The Draft EIR/EIS includes a proposed ARTIC station concept and station-area circulation/parking approach that directly intersects OCVIBE's approved public improvements, parking replacement program, and event operations. AREP has created an overlay of the

1818 Authority's mapping relative to OCVIBE construction and public improvement elements (Attachment A) and summarizes key impacts below.

A. ARTIC Station Facilities, Parking, Access, and Curb/Bus Operations (ARTIC 232-072-06; 2626 E. Katella Avenue)

The Draft EIR/EIS proposes that HSR station platform and facilities at ARTIC would be located on the existing station site at 2626 E. Katella Avenue, with HSR platform access through: (i) an extension of ARTIC's existing pedestrian bridge from the northeast, and/or (ii) extensions of two existing pedestrian tunnels on the western end of the ARTIC platforms. The Draft EIR/EIS also states:

- the existing Metrolink/Amtrak parking lot north of Angel Stadium would be reconfigured into a pick-up/drop-off area connected to the existing access road from Katella Avenue;
- existing pick-up/drop-off areas and bus bays around the outside of the ARTIC building would be shared with HSR passengers; and
- a new parking structure adjacent to SR-57 and Katella Avenue would be constructed to serve station-related parking demand, and therefore parking and traffic access demands are not anticipated to result in changes in land use patterns at ARTIC.

The Draft EIR/EIS and mapping also indicate partial acquisition and/or permanent easement needs in the ARTIC area.

AREP's concern is not limited to "land use patterns." The critical issue is whether this station access, curb, and parking concept can be implemented without:

- impairing OCVIBE-approved ARTIC interface improvements (including the modified ARTIC bus drop-off configuration, pedestrian connectivity improvements, and bridge interfaces);
- displacing or reducing transit customer parking supplies required to maintain ARTIC operations;
- interfering with OCVIBE event-day ingress/egress, emergency access, deliveries, and internal circulation; and
- delaying or preventing delivery of City-approved parks and open space components (including Meadow Park) that are part of OCVIBE's public benefit package.

1819 Additionally, portions of the ARTIC parcel include General Plan land use designation Open Space and planned public park elements required as part of OCVIBE's residential approvals. The

1819 Draft EIR/EIS station concept and property needs must be reconciled with those adopted land use designations and approved park delivery.

Accordingly, the Final EIR/EIS should reconcile the ARTIC HSR station concept with OCVIBE's approved and under-construction improvements and commit to a coordinated station-area design and construction phasing plan that preserves ARTIC functionality and OCVIBE project delivery.

1820 *B. Parking Deck A (APN 232-071-02; 232-071-03) – Parking Replacement, Park Delivery, and Pedestrian Connectivity*

The Authority's mapping indicates the LA–A Project could fully acquire Parking Deck A ("Deck A") (APN 232-071-02 and -03). AREP owns Deck A, which is currently under construction as an approximately 1,840-space parking structure. Deck A is planned and required to replace the existing 456 surface parking spaces serving ARTIC that will be removed in connection with OCVIBE implementation. Deck A includes 15 spaces reserved for Meadow Park visitors, and a planned pedestrian bridge over Douglass Road will connect Deck A with ARTIC.

Full acquisition of Deck A—or construction, access, or phasing constraints that prevent Deck A from being completed and operated as approved—would materially impair:

- transit customer parking availability for ARTIC users;
- OCVIBE event-day parking supply and circulation; and
- AREP's ability to implement approved site plans and public improvements currently under construction.

These effects would cascade across the OCVIBE campus by shifting demand to other facilities, increasing circulation conflicts at Katella Avenue and internal streets, and undermining carefully sequenced phasing that supports delivery of public benefits and time-sensitive commitments.

Development Agreement transit parking obligations. The Amended and Restated Development Agreement requires the project to provide (at minimum) 701 transit customer spaces ("Minimum Transit District Parking") plus continued use of 405 off-site stadium transit spaces on Lot C (total 1,106). The agreement also recognizes an interim condition allowing a temporary reduction below 1,082 before the ARTIC Garage is open, but not below the 900 minimum required under OCTA/Metrolink agreements. Any acquisition of Deck A, or interim construction sequencing that removes or materially constrains these parking supplies, would jeopardize compliance with contractual and agency obligations and must be avoided or mitigated through an enforceable replacement parking and access plan coordinated with OCTA, Metrolink, and the City.

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C. Lot B (APN 386-521-17) – Contractual Development Rights Under the Development Agreement

The Authority's mapping indicates the LA–A Project could fully acquire Lot B, approximately 2.4 acres, APN 386-521-17 ("Lot B"). Lot B is City-owned, but AREP's development rights to implement development on Lot B are included in the Development Agreement. Specifically, Section 7.10 (Potential Development of Lot B) requires the parties to negotiate a transactional right for AREP to control Lot B to develop up to 170,000 square feet of institutional use (the "Lot B Building"). Section 7.10 ties Lot B development to public-access and parking commitments, including perpetual public use of the parking facility and provision—at AREP's sole cost—of additional employee, guest, and ADA-accessible spaces beyond minimum required parking in a minimum amount of 510 spaces (assuming the Lot B Building is greater than three stories), together with continued compliance with the Development Agreement's parking requirements.

Lot B would no longer be accessible from Douglass due to conflicts with the proposed track widening (~100' south of the existing tracks) and the existing driveway into the site. Lot B is bound by Caltrans SR-57 and the Santa Ana River. The track widening effectively eliminates the limited Douglass Road frontage and access for Lot B.

Accordingly, permanent acquisition of Lot B would eliminate the City-approved mechanism to deliver this institutional program and associated public benefits and would impair AREP's vested, bargained-for contractual right to pursue the option/ground lease and associated development program. The Final EIR/EIS must treat this as an interference with vested contractual development rights—not merely a generic land conversion.

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D. Lot C / ARTIC Station-Area Operations, Transit Parking, and Access Functions (APNs 232-011-39 and 232-011-40, 232-072-06, and 232-071-02 and 232-071-03)

The Draft EIR/EIS station concept at ARTIC contemplates: (i) reconfiguring the Metrolink/Amtrak parking lot north of Angel Stadium into a pick-up/drop-off facility connected to Katella Avenue; (ii) sharing the existing pick-up/drop-off and bus bays around ARTIC with HSR passengers; and (iii) constructing a new parking structure adjacent to SR-57 and Katella Avenue to serve station-related parking demand. Those changes—together with any acquisitions, permanent easements, or temporary construction easements in the Lot C/ARTIC area—have the potential to displace or compete with transit customer parking supplies and station-area circulation functions that are contractually protected and operationally necessary for ARTIC and the OCVIBE campus.

OCVIBE's Development Agreement establishes binding transit customer parking obligations that must be maintained throughout construction and operations. The Final EIR/EIS must therefore move beyond generalized "no land use pattern change" conclusions and instead provide

1822 parcel-level disclosure and enforceable commitments demonstrating that HSR station implementation will not interfere with:

- the minimum transit parking supply and transit agency operational needs;
- access and circulation required for transit and event operations; and
- OCVIBE's approved public improvement program and construction sequencing.

1823 *E. Douglass Road, Access, Bridges, Utilities, and Public Improvement Interfaces*

The ARTIC area is part of an integrated, approved set of circulation and public improvement elements associated with OCVIBE, including roadway improvements (Katella Avenue, Stanley Cup Way, Douglass Road, River Road phases), pedestrian connectivity, bridge interfaces, and public realm elements that support transit riders and event patrons. Any HSR-related staging, lane closures, access road modifications, or utility relocations affecting Douglass Road, Katella Avenue connections, or planned pedestrian bridge interfaces could impair OCVIBE's ability to deliver approved improvements on schedule and could reduce the functional utility of those improvements once delivered.

Specifically, the profile of Douglass South at the proposed High Speed Rail bridge would need to be lowered to create the necessary clearance from the new HSR bridge to the roadway surface to provide access to the Angels Parking lot.

Accordingly, the Final EIR/EIS must include a coordinated design and construction approach that preserves approved bridge footprints, access easements, clearances, and continuous emergency response routes, and includes utility coordination and relocation agreements that do not delay OCVIBE public improvement milestones.

1824 *F. Stadium Towers, 2300 E. Katella Avenue, and Other Adjacency-Sensitive Uses North of the LOSSAN Corridor (APNs 253-532-04, 253-532-06, 253-532-07, and 232-532-08)*

The Final EIR/EIS must analyze and commit to protections for adjacency-sensitive properties and operations north of the LOSSAN Corridor—including Stadium Towers, 2300 E. Katella Avenue, and nearby office and commercial uses—where construction noise, vibration and settlement risk, altered curb/driveway operations, delivery constraints, and prolonged access limitations could cause material operational disruption and potential structural concerns, particularly during event operations and peak demand periods. General statements about "temporary effects" are not sufficient in this dense, urban-adjacent context; enforceable monitoring, corrective action thresholds, access continuity standards, and construction phasing that avoids extended lane/driveway closures are required.

1825 *G. The Grove – Operating Agreement and Event Operations (APN232-011-47)*

1825 AREP operates The Grove pursuant to an operating agreement and supports event-driven uses that depend on reliable access, loading, parking availability, and predictable traffic management. Temporary construction easements, lane closures, altered curb operations, and construction-period noise/vibration can materially impact scheduled events and contractual obligations. The Final EIR/EIS must analyze these operational impacts and include enforceable construction coordination protocols, advance notice requirements, and event-day protection measures, including limitations on disruptive construction activities during peak event windows and guarantees for patron, delivery, and emergency access.

1826 **4. Requested Clarifications, Commitments, and Mitigation Measures**

To cure the Draft EIR/EIS deficiencies and avoid or reduce impacts to OCVIBE and related properties, AREP requests that the Final EIR/EIS include the following as enforceable commitments and binding project requirements:

1. Parcel/APN-Level Acquisition and Encumbrance Disclosure. A parcel/APN-level table and mapping identifying all ARTIC/Lot C and OCVIBE-area properties subject to fee acquisition, permanent easement, and/or temporary construction easement/lease, including the footprint, duration (for temporary uses), and intended construction activity (staging/laydown/fabrication, access modification, utility relocation, etc.).

1827 2. Parking Impacts by Phase (Transit vs Event vs HSR). Quantification of parking stall losses, relocations, and replacements by construction phase and in operations, clearly distinguishing:
   a) transit customer parking supply;
   b) event/day-of-use demand assumptions; and
   c) HSR-designated parking supply (including in the SR-57/Katella structure).

1828 3. Transit Parking Compliance Demonstration. A phasing plan demonstrating how Development Agreement and OCTA/Metrolink minimum transit parking obligations will be met at all times, including enforceable replacement parking provisions if stalls are removed or functionally unavailable.

4. Curb, Bus Bay, and Pick-Up/Drop-Off Governance Plan. A station-area operations and governance plan specifying who controls and manages shared curb space, bus bays, and pick-up/drop-off functions; how transit functions are preserved; and how OCVIBE event-day access and circulation will be maintained.

5. Access Continuity Standards and Construction Access Management. Requirements maintaining continuous local access, protecting emergency response routes, and preventing extended driveway or lane closures that materially impair adjacent property operations, including OCVIBE construction access.

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6. Early Design Coordination and Utility Agreements. Early and ongoing coordination with AREP and the City to preserve approved bridge footprints/clearances/access easements; plus utility coordination and relocation agreements that do not delay OCVIBE public improvement milestones.

7. Vibration and Settlement Protection. Pre-construction condition surveys; enforceable vibration and settlement monitoring; defined corrective-action thresholds; and repair/compensation commitments where project-caused damage or unacceptable service disruption occurs.

8. Event-Day Protection Measures. Protocols for construction scheduling, advance notice, and traffic management that avoid disruption during peak event windows and guarantee patron, delivery, and emergency access for venues including The Grove.

9. No Appropriation of Required Transit Parking. A commitment that HSR station parking demand will not be satisfied by appropriating, reassigning, or rendering unavailable any spaces needed to meet Development Agreement and transit-agency minimum transit customer parking requirements.

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5. Requested Alternative Consistent with Shared Passenger Track Alternatives

The Draft EIR/EIS explains that within this existing passenger rail corridor the Shared Passenger Track Alternatives A and B do not propose new HSR stations, but instead propose modifications to existing passenger rail stations to allow for shared operations with HSR. Consistent with that framework—and given that OCVIBE was approved in 2022, amended unanimously in 2024, and is currently under construction—AREP requests that the Final EIR/EIS evaluate an Anaheim station-area facility siting/access refinement option that reduces or avoids encumbrances on OCVIBE-controlled and OCVIBE-interface parcels while maintaining shared-operations functionality.

Specifically, AREP requests that the Authority evaluate an alternative/refinement that shifts station-area access functions and passenger-processing/parking interfaces west of SR-57, in the vicinity of the former Angel Stadium Station area, with secure pedestrian connectivity supporting intermodal transfer to ARTIC, and that:

- avoids acquisition or material impairment of Parking Deck A (APN 232-071-02 and -03), which is an under-construction, City-approved parking replacement and transit interface facility essential to OCVIBE's park delivery and ARTIC parking obligations;

- avoids acquisition of Lot B (APN 386-521-17), which would interfere with AREP's Development Agreement rights and the City-approved framework for the Lot B institutional development program and associated public benefits; and

1829

- satisfies station-related pick-up/drop-off and parking needs without displacing contractually required transit customer parking and without undermining OCVIBE's approved construction sequencing and public improvement milestones.

If evaluation of this refinement option or related Anaheim station-area changes results in substantial new information or a substantially different approach not previously analyzed, the Authority must provide appropriate additional public review consistent with CEQA's recirculation requirements.

1830

6. Conclusion

AREP supports improved regional mobility and appreciates the Authority's efforts to advance a major statewide infrastructure project. However, the OCVIBE Project is approved, vested, and under construction; it delivers significant public benefits, including affordable housing, parks, infrastructure improvements, and ARTIC interface enhancements. The Final EIR/EIS must therefore include parcel-level disclosure, enforceable commitments, and (where feasible) refined station-area alternatives to ensure both projects can be delivered without undermining vested rights, contractual obligations, critical public improvements, and time-sensitive construction sequencing.

AREP welcomes the opportunity to meet with the Authority to discuss coordination measures and alternatives and requests continued inclusion on notices regarding environmental review and station-area planning decisions.

Respectfully submitted,

HOLLAND & KNIGHT LLP



Chelsea Maclean

Enclosures:

Attachment A: HSR Impact Overlay on OCVIBE Project and Related Interests

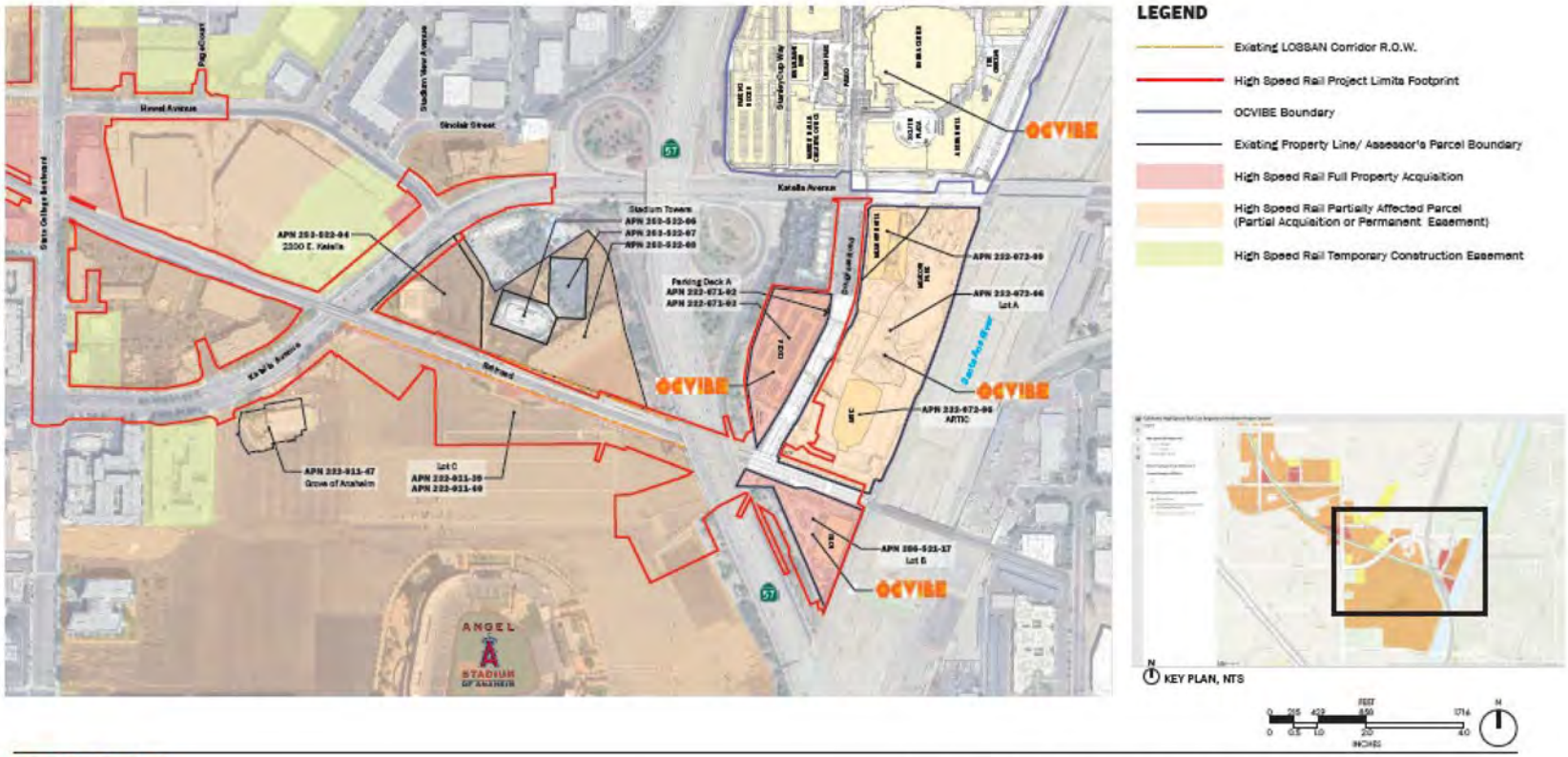
Attachment B: OCVIBE / ARTIC Property and APN Matrix

1831

Attachment A

HSR Impact Overlay on OCVIBE Project and Related Interests

ANAHEIM REAL ESTATE PARTNERS, LLC (AREP)



OCVIBE
February 2026
DRAFT EIR/EIS Comment Letter - California High-Speed Rail Los Angeles to Anaheim Project Section

Anaheim Real Estate Partners, LLC
2101 East Coast Highway, Suite 230, Corona del Mar, CA 92625
Brian Myers, bmyers@nuqueshventures.com

Figure 1

Attachment B

OCVIBE / ARTIC Property and APN Matrix

This matrix identifies properties and operational assets within the OCVIBE and ARTIC station influence area that may be affected by the Los Angeles–Anaheim High-Speed Rail Project. It documents ownership, vested rights, operational obligations, and the specific disclosures and commitments required in the Final EIR/EIS to ensure compliance with CEQA and protection of approved development rights, as further described in Section 3 of this letter.

	Property / Asset	APN(s)	Owner	AREP / OCVIBE Interest	Existing / Approved Use	Key Operational / Contractual Obligations	Potential HSR Impact Type	Required Final EIR/EIS Clarifications & Commitments
1832	**ARTIC Station Site (2626 E. Katella Ave)**	232-072-06	City of Anaheim	Station-area interface improvements; circulation, curb, and pedestrian connectivity obligations under DA	Intermodal transit facility (Metrolink, Amtrak, buses) with approved ARTIC interface improvements	Maintain transit operations; bus bays; pick-up/drop-off; pedestrian access; integration with OCVIBE public improvements	Partial acquisition; permanent easement; temporary construction easement; curb and circulation reconfiguration	Parcel/APN-level acquisition table; station-area access and curb governance plan; construction phasing showing uninterrupted transit operations; coordination with approved ARTIC improvements
1833	**ARTIC North Parking Lot A**	232-072-06	City of Anaheim	Operational reliance for ARTIC access; Public Park Requirement/Public Benefit	Existing Metrolink/Amtrak parking; future public park and General Plan Open Space	Transit rider parking; pedestrian circulation access from Katella	Reliance on existing parking that will be removed or reconfigured	APN identification; stall loss accounting; curb and circulation governance plan; construction access management

1834	**Parking Deck A**	232-071-02; 232-071-03	AREP	Fee owner; required parking replacement and ARTIC interface facility	Under-construction structured parking (≈1,840 spaces)	Replacement of 456 ARTIC surface spaces in Lot A; 15 Meadow Park spaces; pedestrian bridge connection to ARTIC; DA transit parking compliance	Full acquisition; temporary construction easement; access impairment	Avoid acquisition; if unavoidable, enforceable replacement parking plan; phasing to maintain minimum transit parking at all times; access continuity during construction
1835	**Lot B**	386-521-17	City of Anaheim	Contractual development rights under DA §7.10 (option/ground lease)	Approved future institutional development (up to 170,000 sf)	Good-faith negotiation rights; delivery of public-access parking and minimum 510 additional spaces if developed	Full acquisition	Identification of acquisition need; avoidance alternative; recognition of interference with vested contractual rights; mitigation if taken with replacement parking
1836	**Angel Stadium Parking – Lot C (Off- Site Transit Parking)**	232-011-39; 232-011-40	City of Anaheim	Off-site transit parking obligation under DA	Stadium parking	405 off-site transit spaces required by DA	Reassignment or displacement	Commitment not to appropriate off-site transit parking for HSR demand
1837	**Douglass Road Corridor & Pedestrian Bridge Interface**	Multiple / Public Right of Way	City of Anaheim / AREP	Public improvement obligations and approved bridge connections	Roadway, pedestrian, and emergency access	Maintain access, emergency routes, and bridge functionality	Lane closures; staging; utility relocation	Construction access plan; bridge footprint preservation; emergency access guarantees; utility coordination agreements

Stadium Towers; 2300 E. Katella Avenue	253-532-04, 253-532-06, 253-532-07, and 232-532-08	Private	Adjacent land use; adjacency-sensitive structure	Office tower with structured and surface parking; commercial/office use	Access, deliveries, tenant operations	Vibration; settlement; access constraints	Pre-construction condition surveys; vibration/ settlement monitoring; access continuity standards; APN identification; access continuity standards; business interruption avoidance
The Grove	232-011-47	City of Anaheim	Operating agreement for event-driven use	Entertainment venue	Event scheduling; loading; parking; traffic management	Noise; vibration; access and curb disruption	Event-day protection measures; construction coordination protocols; advance notice requirements

Use of This Exhibit in the Final EIR/EIS

AREP requests that the Final EIR/EIS:

1. Incorporate this matrix (or a functionally equivalent table) with **confirmed APNs, acquisition types, and construction durations**.
2. Cross-reference the matrix to **construction phasing diagrams**, **parking supply tables**, and **station-area access plans**.
3. Include enforceable commitments tied to each affected property to ensure:
   - continuous access,
   - compliance with Development Agreement and transit-agency parking minimums,
   - protection of vested development rights, and
   - avoidance of cascading construction and operational impacts to the OCVIBE Project.

23.28 Response to Submission 013854 (Chelsea Maclean, Anaheim Real Estate Partners, LLC, Feb 3, 2026)

23.28.1 1815

Refer to Standard Response LAA-Response-GENERAL-02: Consideration of Plans and Projects, 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 Draft Environmental Impact Report (EIR)/Environmental Impact Statement (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. Section 3.13 was revised in the Final EIR/EIS to reflect the most current status of the project; 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 these revisions.

The California High-Speed Rail Authority (Authority) discloses which parcels in Los Angeles and Orange Counties would require full or partial acquisitions or temporary construction easements (TCE) in Appendix 3.1-B, Los Angeles to Anaheim: Footprint Mapbook. The maps depicting the OCVIBE parcels are on pages 39 and 40 of Appendix 3.1-B. As noted on the opening page of Section 3.13 of the Draft EIR/EIS, additional details of affected parcels including, but not limited to, Assessor's Parcel Numbers (APN), addresses, land uses, and parcel acquisition types are provided in the *Los Angeles to Anaheim Project Section Draft Relocation Impact Report*.

The potential impacts that would occur as a result of the Shared Passenger Track Alternatives at Anaheim Regional Transportation Intermodal Center (ARTIC) are evaluated throughout the Draft EIR/EIS, including those pertaining to access, parking, curb management, and utilities. Access, parking, and curb management conflicts are addressed in Section 3.2, Transportation, of the Draft EIR/EIS. Utility conflicts are addressed in Section 3.6, Public Utilities and Energy. Although these Draft EIR/EIS environmental sections do not specifically evaluate potential impacts on OCVIBE, they evaluate potential effects on the environment that could be experienced by those within affected areas. In the case of OCVIBE, because of its immediate proximity to ARTIC, project impacts on ARTIC could be experienced by those associated with OCVIBE. Refer to the analyses and conclusions contained in Sections 3.2 and 3.6 of the Draft EIR/EIS. Section 3.13 of the Draft EIR/EIS evaluates the project's consistency with existing development patterns and local land use policies.

The Authority has committed to enforceable impact avoidance and minimization features (IAMF) (refer to Appendix 2-A, Impact Avoidance and Minimization Features, of the Draft EIR/EIS), which are programmatic and consist of features that the Authority will incorporate during project design and construction of the California High-Speed Rail (HSR) System to avoid or reduce environmental and community impacts, including impacts associated with the Los Angeles to Anaheim Project Section (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. The Authority's IAMFs would be incorporated as part of construction and operational activities in proximity to the OCVIBE Project. Where adverse project impacts cannot be sufficiently avoided or reduced, the Draft EIR/EIS sets forth mitigation measures to further address the potential impacts and discloses the level of severity that would occur following mitigation.

The commenter provides a list of topics included in their submission, which are addressed as follows.

Refer to response to comment #1816 below for the Authority's response to "OCVIBE Background, Entitlements, and Public Benefit Commitments." Refer to response to comment #1817 below for the Authority's response to "Draft EIR/EIS Project Description and Anaheim Land Requirement Issues."

Refer to responses to comments #1818 to #1825 below for the Authority's responses to "Impacts to Specific AREP/OCVIBE Properties and Station-Area Operations." Refer to responses to comments #1826 to #1828 below for the Authority's responses to "Requested Clarifications, Commitments, and Mitigation Measures." Refer to response to comment #1829 below for the Authority's response to "Requested Alternative Consistent with Shared Passenger Track Alternatives." Refer to response to comment #1830 below for the Authority's response to "Conclusion."

The Authority has included this commenter's submission and attachments in the project's administrative record.

23.28.2 1816

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

The commenter summarizes the background, components, current construction activities, and various approved entitlements of the OCVIBE Project. The Authority acknowledges OCVIBE's status as a planned project that has been approved and vested by the City of Anaheim and acknowledges that construction activities are currently being conducted by Anaheim Real Estate Partners (AREP) to implement the OCVIBE project components.

Section 3.13.5.2, Zoning and Planned Uses, of the Draft EIR/EIS regarding the OCVIBE Project has been revised to account for updates to OCVIBE. Refer to Section 16.5.13 in Chapter 16 of the Final EIR/EIS for this revision.

23.28.3 1817

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

The commenter provides a numbered list of topics in their comment, which are addressed as follows.

1. With respect to how the Draft EIR/EIS provides parcel-specific disclosure of all acquisitions and easements or temporary construction uses, refer to response to comment #1815 above.

2. With regard to how the Draft EIR/EIS identifies the specific property right that would be needed of an affected parcel, refer to response to comment #1815 above.

3. Regarding the quantification of access, parking, and curb impacts by construction phase, this level of detail is not available at the current design level, because it goes beyond the level of detail that is required for defining the environmental footprint for purposes of allowing analysis of the project's potential environmental impacts. The project is currently at a 15 percent design level, which is sufficient for environmental analysis. Quantification of construction impacts by phase will be determined in later phases of design.

In the Draft EIR/EIS, although Impact LU-4 provides a general qualitative analysis, Impact LU-6 more specifically evaluates land use impacts of parking and traffic access demands at station sites and addresses concerns raised by the commenter. As discussed therein, the Shared Passenger Track Alternatives would include a new parking structure adjacent to State Route (SR) 57 and Katella Avenue. Therefore, station-related parking and traffic access demands are not anticipated to result in changes in land use patterns at ARTIC. Additionally, pursuant to Impact TR-13 in Section 3.2 of the Draft EIR/EIS, the Authority will incorporate TR-IAMF#12 (Pedestrian and Bicycle Safety) and TR-IAMF#13 (Stakeholder Coordination with Transportation Agencies). TR-IAMF#12 requires the Authority-designated contractor to provide a technical memorandum describing how, during operation, pedestrian and bicycle accessibility and safety will be provided and supported across the HSR corridor, to and from stations, and on station property. TR-IAMF#13 requires the Authority to work closely with all agencies that provide bus service to existing and planned rail stations to define roles and responsibilities, including operational and maintenance responsibilities, to prevent effects on existing and planned bus routes servicing rail stations within the project corridor. Overall, the Draft EIR/EIS concludes that with incorporation of these IAMFs, the Shared Passenger Track Alternatives

would not result in land use impacts on parking and traffic access demands at station sites, including at ARTIC.

Regarding parking in the area, the Draft EIR/EIS includes an analysis of parking impacts from HSR construction at stations under Impact TR-8 in Section 3.2 of the Draft EIR/EIS, as well as an analysis of parking demands at station sites under Impact LU-6 in Section 3.13. In addition, as discussed in Section 2.7.3, Ridership and Station-Area Parking, of the Draft EIR/EIS, the Authority's goals are to support HSR ridership by promoting, in partnership with local agencies, transit-oriented development around HSR stations and expansion of multimodal access to the HSR system. Consistent with these goals, the Authority commits 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 an access and parking strategy to inform the final location, amount, and phasing of parking at ARTIC. As the Authority progresses to commencing construction of the HSR components at ARTIC, the Authority will further evaluate parking to determine at that time what parking is needed to accommodate HSR. The Authority will continue to coordinate with AREP to ensure that parking needs for both HSR and OCVIBE are sufficiently addressed as both projects advance.

4. With respect to the Authority's commitment to avoiding interference with planned and approved OCVIBE improvements and coordinating with AREP, the Authority and the City of Anaheim executed a Memorandum of Understanding (MOU) in December 2020 specifically regarding the HSR station design at ARTIC. Consistent with the MOU, the Authority and City of Anaheim have continued to coordinate on the HSR design at ARTIC, with meetings held in 2021, 2022, 2023, and 2025. In addition to the City of Anaheim, the 2020 MOU also formalizes the Authority's commitment to collaborate with other parties as it relates to planned development within the Platinum Triangle. As such, the Authority will continue to coordinate with the City of Anaheim and AREP as both HSR and OCVIBE advance.

23.28.4 1818

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

23.28.5 1819

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

The commenter correctly provides that, as presented in the Draft EIR/EIS, the Authority's proposal to share the existing pick-up/drop-off area north of ARTIC with the City of Anaheim would conflict with the OCVIBE Master Site Plan. The existing pick-up/drop-off area north of ARTIC is designated by the *City of Anaheim General Plan* as Mixed-Use Urban Core, which allows for intermodal transportation uses. However, while the proposed HSR components at ARTIC would be consistent with the Mixed-Use Urban Core designation, the OCVIBE Master Site Plan identifies the existing pick-up/drop-off area as Transit District Sub-Area B, which is planned to be incorporated into OCVIBE's Meadow Park.

Pursuant to the OCVIBE Development Agreement, the existing pick-up/drop-off area north of ARTIC would be relocated to an area west of Meadow Park and east of Douglass Road. The Authority would coordinate with the City of Anaheim to share this relocated pick-up/drop-off area with HSR passengers. The description of how the Authority would share the pick-up/drop-off area with the city in Section 2.6.3.3, High-Speed Rail Station Facilities, of the Draft EIR/EIS has been corrected in the Final EIR/EIS. Additionally, Table 3.15-5 of the Draft EIR/EIS, which identifies existing and proposed recreational resources available for public use in the project section, has been corrected in the Final EIR/EIS to include Meadow Park. Section 3.15.6, Environmental Consequences, and Section 4.6.1, Parks, Recreation, Open Space, and Wildlife and Waterfowl Refuges, of the Draft EIR/EIS have also been revised to include an analysis of potential impacts on Meadow Park. Refer to Section 16.4, Chapter 2: Alternatives; Section 16.5.15, Section 3.15: Parks, Recreation, and Open Space; and Section 16.6, Chapter 4: Draft Section 4(f) and Section 6(f) Evaluations, in Chapter 16 of the Final EIR/EIS for these revisions.

23.28.6 1820

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

Refer to response to comment #1817 above for more information on the Authority's commitment to developing a multimodal access plan prior to construction at ARTIC, which will inform the final location, amount, and phasing of parking at ARTIC.

23.28.7 1821

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-01: Relocations, Right-of-Way Process, Eminent Domain, in Chapter 18.

23.28.8 1822

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

With respect to disclosures of parcels that would be affected by the introduction of HSR service at ARTIC, refer to response to comment #1815 above.

Regarding minimum transit parking supply and transit operational needs associated with OCVIBE, Section 2.6.3.3 of the Draft EIR/EIS acknowledges that once ridership increases such that combined HSR and local-provider passenger volumes exceed the design capacity of the ARTIC passenger terminal building, the Authority would build a separate HSR passenger terminal. This would include reconfiguration of the existing Metrolink/Amtrak parking lot north of Angel Stadium. In light of the uncertainty regarding the need for station area parking, the Authority has conservatively identified parking facilities based on the maximum forecast for parking demand at each station and the local conditions affecting access planning. To account for HSR-generated parking demand and modifications to existing parking areas around ARTIC, the Authority conservatively planned for a maximum number of parking spaces for HSR passengers and replacement of existing parking spaces that would be lost as part of implementing the project components. As discussed under Impact TR-8 of the Draft EIR/EIS, these parking spaces would be accommodated by the Authority through construction of a new HSR parking structure adjacent to SR 57 and Katella Avenue, which is proposed to provide a total of 1,976 parking spaces (1,350 HSR parking spaces and 626 replacement parking spaces). The Authority acknowledges that OCVIBE is currently building Parking Deck A in the location proposed by the Authority for the new HSR parking structure. Pursuant to Section 2.6.3.3 of the Draft EIR/EIS, the Authority would work with the City of Anaheim on future parking needs as the project design advances. Refer to response to comment #1817 above for more information on the Authority's commitment to developing a multimodal access plan.

With regard to access and circulation required for transit and OCVIBE event operations, the Authority will incorporate IAMFs to address, reduce, or minimize adverse project effects. Refer to Section 3.2.4.2, Impact Avoidance and Minimization Features, of the Draft EIR/EIS, which discusses the IAMFs that will be incorporated to address, reduce, or minimize potential access and circulation traffic impacts during construction, including, but not limited to, TR-IAMF#2, Construction Transportation Plan; TR-IAMF#4, Maintenance of Pedestrian Access; TR-IAMF#5, Maintenance of Bicycle Access; and TR-IAMF#8, Construction During Special Events. TR-IAMF#2 requires implementation of traffic controls established by the California Manual on Uniform Traffic Control Devices, including, among others, provisions for alternative access during temporary road closures. TR-IAMF#4 and TR-IAMF#5 require provisions to maintain pedestrian and bicycle access, respectively, during project construction. TR-IAMF#8 requires a mechanism to prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events.

With respect to OCVIBE's approved public improvement program and construction sequencing, the Authority is committed to continuing to coordinate with AREP to ensure the proposed construction activities are planned with consideration of OCVIBE's plans.

23.28.9 1823

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

With respect to potential disruptions to Douglass Road or Katella Avenue from HSR construction, as discussed in Table 2-14 of the Draft EIR/EIS, Douglass Road would be lowered to provide appropriate clearance under a new railroad bridge that would be added south of the existing railroad bridge over Douglass Road. Refer to drawing number CV-T1581 of Volume 3.3 of the Preliminary Engineering for Project Definition, which includes a profile of the proposed depth. The Authority will incorporate TR-IAMF#2. TR-IAMF#2 requires implementation of traffic controls established by the California Manual on Uniform Traffic Control Devices, including, among others, provisions for alternative access during temporary road closures. Where road closures are required during construction, the closures will be limited to the hours that are least disruptive to access for adjacent land uses. The traffic controls will also provide for safe vehicular and pedestrian access to local businesses and residences during construction and scheduled transit access where construction would otherwise impede such access. Additionally, the Authority is committed to continuing to coordinate with AREP on the proposed HSR construction activities, including staging and lane closures associated with the Douglass Road modifications, to ensure HSR construction is planned with consideration of OCVIBE's approved footprints, access easements, clearances, emergency routes, public improvement program, and construction sequencing.

Regarding potential conflicts with planned pedestrian bridge interfaces from implementation of HSR service at ARTIC, future coordination would also occur with respect to the parcels planned for OCVIBE's under-construction Parking Deck A (APNs 232-071-02 and -03) to confirm that the parking requirements for both OCVIBE and HSR are accommodated.

With respect to utility relocations affecting Douglass Road or Katella Avenue, as detailed in Section 3.6 of the Draft EIR/EIS, the Authority will incorporate PUE-IAMF#4, Utilities and Energy, to coordinate construction activities with utility service providers to minimize utility interruptions.

23.28.10 1824

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

With respect to risks of noise and vibration impacts on adjacent businesses during HSR construction, Section 3.4, Noise and Vibration, of the Draft EIR/EIS evaluates temporary exposure of sensitive receivers to construction noise and vibration under Impact N&V-1 and Impact N&V-2. With regard to construction noise impacts, Table 3.4-13 presents the estimated noise impact distances for daytime and nighttime work for each phase and sub-phase of HSR construction. Because the Authority's incorporation of NV-IAMF#1, Noise and Vibration, would not sufficiently address or minimize all potential construction noise impacts, HSR construction activities would be subject to N&V-MM#1, Construction Noise Mitigation Measures. N&V-MM#1 requires preparation of a noise-monitoring program prior to construction and implementation of noise-control measures to ensure compliance with appliable noise limits where noise-sensitive receivers are present. Implementation of N&V-MM#1 would sufficiently reduce potential noise impacts on properties in proximity to HSR construction activities. As such, OCVIBE, as well as nearby properties adjacent to the project alignment or roadways proposed for modifications, would not experience adverse noise effects during HSR construction activities.

With respect to construction vibration impacts, Table 3.4-14 of the Draft EIR/EIS provides the approximate distances within which receivers could experience construction-related vibration damage effects. The construction activity with the greatest potential for vibration-related damage is impact pile driving. As discussed in Impact N&V-2, vibration damage effects are only anticipated at a few buildings near new water crossing structures. No HSR elements would be built in the ARTIC area that would require pile driving. As such, OCVIBE, as well as nearby properties adjacent to the project alignment or roadways proposed for modifications, would not experience vibration damage effects during HSR construction activities. Impact N&V-2 also discusses vibration annoyance effects, with

impact distances listed in Table 3.4-15. The Authority will incorporate NV-IAMF#1, which requires the contractor to document how federal guidelines for minimizing noise and vibration would be employed when construction is occurring near sensitive receivers.

Regarding the potential for settlement, the Authority will incorporate GEO-IAMF#7, Evaluate and Design for Large Seismic Ground Shaking, which necessitates compliance with state regulations that require construction to account for geotechnical properties and address risk factors associated with secondary seismic hazards, including settlement.

Regarding disruptions to curb and driveway operations, deliveries, and property access of adjacent businesses during HSR construction, the Authority will incorporate TR-IAMF#2; TR-IAMF#6, Restriction on Construction Hours; TR-IAMF#8; and SOCIO-IAMF#1, Construction Management Plan. TR-IAMF#2 requires implementation of traffic controls established by the California Manual on Uniform Traffic Control Devices, including, among others, provisions that minimize disruptions to businesses, customers, delivery vehicles, and buses, as well as ensuring safe vehicular and pedestrian access to local businesses during construction. TR-IAMF#6 limits the hours in which construction material deliveries and construction employee arrivals/departures may occur and allows for altering the restricted hours to accommodate local travel patterns. TR-IAMF#8 requires a mechanism to prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events. SOCIO-IAMF#1 would minimize impacts on businesses during construction by providing signage and maintaining access to affected businesses through roadway modifications or detours. Additionally, refer to response to comment #1817 above for more information on TR-IAMF#12.

23.28.11 1825

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

With respect to how the Authority will incorporate IAMFs to address, reduce, or minimize construction impacts on adjacent businesses, including those pertaining to TCEs, lane closures, curb operations, and special events, refer to response to comment #1824 above.

Regarding potential construction noise and vibration impacts, refer to the discussion response to comment #1824 above on Impact N&V-1 and Impact N&V-2 of the Draft EIR/EIS.

23.28.12 1826

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

Refer to response to comment #1815 above for more information on parcel-level disclosures provided by the Draft EIR/EIS in Appendix 3.1-B.

23.28.13 1827

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

Refer to response to comment #1817 above. The project is currently at a 15 percent design level. The current 15 percent design level sufficiently defines the environmental footprint, which allowed for adequate analysis of the project's potential environmental impacts in the Draft EIR/EIS. However, the precise quantification of parking space configuration by construction phase will be determined in later phases of design.

The commenter provides a list of topics in the comment, which are addressed as follows.

a. With respect to transit customer parking supply, refer to response to comment #1822 above.

b. Regarding special event or day-of-use demand, the Draft EIR/EIS provides that the Shared Passenger Track Alternatives would include new HSR parking spaces and replacement parking spaces to account for displaced existing parking at ARTIC. Aside from these new and replacement parking spaces, the Authority is not responsible for providing surplus parking supply to address non-

HSR demand generated by events at properties near ARTIC. It should be noted that, during project construction, the Authority will incorporate TR-IAMF#8, which requires the Authority-designated contractor to provide a mechanism to prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events. The Authority will coordinate with AREP to manage implementation of both the project section and OCVIBE as both projects advance.

c. The Shared Passenger Track Alternatives would include new HSR parking spaces and replacement parking spaces to account for displaced existing parking at ARTIC. Refer to response to comment #1822 above for more information.

23.28.14 1828

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

The commenter provides a list of topics in the comment, which are addressed as follows:

3. With respect to transit parking, incorporation of TR-IAMF#13 and the Authority's commitment to developing a multimodal access plan will prevent conflicts between HSR and OCVIBE regarding transit parking. Refer to response to comment #1817 above for more information.

4. With regard to curb, bus bay, and pick-up/drop-off functions, refer to the discussion in response to comment #1817 above on TR-IAMF#13.

5. With respect to the maintenance of local access, including emergency response routes, during construction, refer to response to comment #1823 above, which discusses TR-IAMF#2 and its provisions for 24-hour access by emergency vehicles.

6. Regarding coordination with the City of Anaheim and AREP to preserve approved bridge footprints, clearances, access easements, and utilities, refer to response to comment #1823 above for more information on the IAMFs the Authority will incorporate to avoid, reduce, or minimize disruptions during project construction. The Authority will coordinate with AREP as the project design advances for both HSR and OCVIBE.

7. Regarding potential impacts related to vibration and settlement, refer to response to comment #1824 above.

8. With respect to event-day protection measures, refer to response to comment #1822 above for more information on the IAMFs that the Authority will incorporate to address, reduce, or minimize adverse project effects during project construction. In addition, refer to response to comment #1827 above for more information on the Authority's responsibilities with respect to accommodating parking demand.

9. With regard to requirements for transit parking, the Shared Passenger Track Alternatives would include new HSR parking spaces and replacement parking spaces to account for displaced existing transit parking at ARTIC. Refer to response to comment #1822 above.

23.28.15 1829

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

Prior to the Authority's coordination with the City of Anaheim and AREP on the ARTIC HSR station platform design in February 2025, the Authority had considered three other configurations that would shift the platform and passenger access facilities away from Parcel 5A/Lot B (Authority 2026). These options were considered as part of evaluating compatibility between the proposed ARTIC HSR facilities and OCVIBE's planned institutional office space on Parcel 5A/Lot B of the OCVIBE Master Site Plan.

Among the options considered, the Authority considered a configuration where a 1,410-foot center platform and HSR station facilities would be west of SR 57, similar to the commenter's requested alternative. This configuration would not have required modification of the existing Douglass Road grade separation, would have encroached less into ARTIC, and would have resulted in the least

number of traffic impacts from parking, because users would have likely parked at ARTIC, which funnels more people to the west side of Angel Stadium. This configuration would have also had the least effect on Parcel 5A/Lot B of the OCVIBE Master Site Plan.

However, this option would have had poorer integration with ARTIC compared to the currently proposed platform configuration, because it would have required additional duplicate HSR facilities west of SR 57 because of the additional distance and more remote location of the platform. The platform's location west of SR 57 would have necessitated indirect access between HSR and non-HSR services, resulting in the longest transfer times among the platform configuration options considered by the Authority. This could have discouraged users from using ARTIC and resulted in less revenue for HSR services. Additional costs associated with the additional HSR facilities could have negated any cost savings accrued as a result of the configuration not requiring modification of the existing Douglass Road grade separation, resulting in similar costs to the currently proposed platform configuration. The underlying fundamental purpose of the HSR system set forth by Public Utilities Code Section 185030 is to be fully integrated with the state's existing rail system. Based on the above, the Authority concluded siting the platform configuration and associated HSR facilities west of SR 57 would not have been as consistent as the currently proposed platform configuration with the HSR system's underlying fundamental purpose set forth by Public Utilities Code Section 185030. Therefore, the center platform west of SR 57 configuration option did not progress forward for consideration.

23.28.16 1830

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

With respect to how the Draft EIR/EIS provides parcel-level disclosures, refer to response to comment #1815 above.

Regarding enforceable commitments, the Authority has committed to enforceable IAMFs (refer to Appendix 2-A of the Draft EIR/EIS), which are programmatic and consist of features that the Authority will incorporate during project design and construction of the HSR system to avoid or reduce environmental and community impacts, including impacts associated with the project section.

With regard to project refinements, refer to the discussion in response to comment #1829 above on the Authority's consideration of three other platform configurations that would have shifted the platform and passenger access facilities away from Parcel 5A/Lot B.

The Authority is committed to coordination with AREP to support satisfactory implementation of HSR and OCVIBE.

23.28.17 1831

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

23.28.18 1832

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

With respect to how the Draft EIR/EIS provides parcel-specific disclosure of all acquisitions and easements or temporary construction uses, refer to response to comment #1815 above.

Regarding station area access and curb governance, refer to response to comment #1817 above.

With regard to construction phasing with uninterrupted transit operations, refer to response to comment #1817 above.

Regarding coordination with respect to approved ARTIC improvements, refer to response to comment #1817 above.

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

23.28.19 1833

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

With respect to how the Draft EIR/EIS provides parcel-specific disclosures, refer to response to comment #1815 above.

Regarding how the Draft EIR/EIS accounts for parking stall losses, refer to response to comment #1822 above.

With regard to curb and circulation governance, refer to response to comment #1817 above.

With respect to construction access management, refer to LU-IAMF#2, Station Area Planning and Local Agency Coordination, and the discussion in response to comment #1817 above on TR-IAMF#13.

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

23.28.20 1834

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

23.28.21 1835

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

Refer to response to comment #1821 above.

23.28.22 1836

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

Refer to response to comment #1822 above for more information on the Draft EIR/EIS's evaluation of parking impacts under Impact TR-8.

Refer to response to comment #1817 above for more information on the Authority's commitment to developing a multimodal access plan in coordination with the City of Anaheim, which will include an access and parking strategy to inform the final location, amount, and phasing of parking at ARTIC.

23.28.23 1837

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

With respect to how access would be maintained during project construction, refer to response to comment #1817 above for the discussion on Impact LU-6 and Impact TR-13. In addition, refer to response to comment #1823 above for more information on TR-IAMF#2.

Regarding preservation of the pedestrian bridge footprint, emergency access guarantees, and utility coordination agreements, refer to response to comment #1823 above.

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

23.28.24 1838

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-02: Impacts on Businesses, in Chapter 18.

With respect to risks of noise and vibration impacts on adjacent businesses during HSR construction and how the Authority will address these impacts, refer to response to comment #1824 above.

Regarding access continuity, refer to response to comment #1817 above for the discussion on Impact LU-6 and Impact TR-13. In addition, refer to response to comment #1823 above for more information on TR-IAMF#2.

With regard to parcel-level disclosures presented in the Draft EIR/EIS, refer to response to comment #1815 above.

With respect to the IAMFs that will be incorporated by the Authority to avoid interruptions to businesses, refer to response to comment #1824 above.

23.28.25 1839

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-02: Impacts on Businesses, in Chapter 18.

With respect to event-day protection measures, refer to response to comment #1822 above for more information on the IAMFs that will be incorporated by the Authority to address, reduce, or minimize impacts on OCVIBE event operations during HSR construction. Additionally, refer to response to comment #1827 above for more information regarding day-of-use demand.

With respect to construction coordination protocols, including the prevention of access and curb disruptions, refer to response to comment #1823 above for more information on the traffic controls required by TR-IAMF#2. In addition, refer to response to comment #1824 above for more information on TR-IAMF#6, TR-IAMF#8, and SOCIO-IAMF#1.

Regarding potential construction noise and vibration impacts, refer to discussion in response to comment #1824 above on Impact N&V-1 and Impact N&V-2 of the Draft EIR/EIS.

Regarding advance notice requirements, refer to discussion in response to comment #1824 above on SOCIO-IAMF#1. The Authority is committed to coordinating with AREP to support satisfactory implementation of both HSR and OCVIBE.

23.28.26 1840

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

The Authority acknowledges the commenter’s request to incorporate a matrix with APNs, acquisition types, and construction durations into the Final EIR/EIS; nevertheless, the level of design is adequate for environmental review.

Refer to response to comment #1815 above for additional information on the Draft EIR/EIS’s parcel-level disclosures regarding acquisitions or TCEs related to OCVIBE parcels.

With respect to construction phasing diagrams, parking supply tables, and station-area access plans, refer to response to comment #1817 above. The project is currently at a 15 percent design level; therefore, the Authority has not prepared specific construction approaches or quantification of construction impacts by phase, because this level of detail would be available in a later phase of design.

No revisions have been made to the Draft EIR/EIS in response to this comment. The Authority is committed to coordinating with AREP to support satisfactory implementation of both HSR and OCVIBE.

23.28.27 1841

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

Los Angeles to Anaheim - RECORD #013862 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Business and/or Organization
Full Name:	Marisa Olguin

Stakeholder Comments/Issues:

See attached public comments: Marisa Olguin President / CEO Vernon Chamber of Commerce 2724 Leonis Blvd | Vernon, California, 90058 molguin@vernonchamber.org | 323.583.3313 o www.vernonchamber.org

February 3, 2026

California High-Speed Rail
Board of Directors
770 "L" Street, Suite 620
Sacramento, CA 95814

RE: Vernon Chamber of Commerce Public Comments on High-Speed Rail Authority's Los Angeles to Anaheim Project Section Overview of its Environmental Impact Statement / Environmental Impact Report

Dear Chair and Board Members of the California High-Speed Rail Authority,

1101 Vernon Chamber of Commerce (The Chamber) submits its public comments in response to the Draft Environmental Impact Statement / Environmental Impact Report (EIS/EIR) for the California High-Speed Rail Authority's (CHSRA) Los Angeles to Anaheim project (Project) section and its impact on the City of Vernon and its broader, regional impact.

The Chamber represents the interests of 1,400 businesses and property owners, as well as more than 50,000 workers, customers, vendors, and community members who work in and commute to the City of Vernon on a daily basis. Vernon plays a critical role in Southern California's industrial economy and goods movement supply chain. These proposed changes to its transportation and infrastructure will have catastrophic consequences that will alter California's statewide economy.

Vernon's manufacturing and distribution footprint contributes $8.5 billion to the regional economy with some of the last-mile industries in food processing, manufacturing in furniture, plastics, apparel, cold storage and dry goods distribution sectors that come in and go out of the small 5.2 radius mile city throughout the region, state and nation.

The Chamber has major concerns regarding the **process and methodology employed by the California High-Speed Rail Authority ("CHSRA")**, as it is single-mindedly pursuing statewide transportation connections that have been publicly reported to be over budget, under-funded, and at the expense of the state's economy where critical industries, established employment centers, and the business employers that sustain them. The proposed section project plan to develop a Light Maintenance Facility on 26th Street that includes the acquisition of properties on 26th Street, expansion of the Burling Northern Santa Fe Hobart Yard, and to restructure 26th Street will cause economic havoc within the community.

Vernon Chamber finds the current research and proposed plan to be completely lacking in disclosure, research, and does not properly analyze impacts to traffic, rail infrastructure as it relates to the Link US project and its impact on current and proposed routes, public safety, hazardous materials and air pollution, and lack of mitigation for the community.

1102 These concerns are not new. On **September 19, 2017**, the Vernon City Council adopted a resolution opposing CHSRA's then-proposed alignment for the High-Speed Rail Project due to its significant local impacts. The Chamber shares and echoes those concerns. The currently proposed alignment would require extensive right-of-way acquisitions that would **displace close to 20 businesses and eliminate over 1,200 jobs**, causing substantial economic disruption to a City whose primary purpose is to support employment and industrial activity.

1103 Of particular concern to the Chamber is the proposed elimination of **26th Street between Downey Road and Pennington Way**. 26th Street is a **critical component of Vernon's roadway network**, serving as an essential bypass that diverts traffic away from the heavily congested **Atlantic Boulevard/Bandini Boulevard intersection**, which lies adjacent to the I-710 freeway. This intersection functions as a gateway for regional goods movement, including port-related truck traffic serving rail yards, warehouses, and manufacturing facilities throughout the area.

Removing 26th Street from the roadway network would force significant volumes of truck and commuter traffic into this already constrained intersection, resulting in severe congestion, reduced reliability for goods movement, increased operating costs for businesses, impaired emergency access, and broader disruptions to Southern California's supply chain. These impacts would be borne not only by Vernon businesses, but by the regional economy as a whole.

1104 In its current form, the Project would impose significant and inadequately analyzed impacts on Vernon's business community, including impacts to traffic circulation, goods movement efficiency, emergency response, air quality, noise, vibration, and public safety. Many of these impacts stem from the proposed construction of the 26th Street Light Maintenance Facility ("LMF") and related improvements in and around BNSF's Hobart Yard.

For these reasons, the Chamber urges CHSRA to **locate the LMF at 15th Street in the City of Los Angeles**, thereby avoiding further concentration of heavy rail infrastructure and associated impacts within Vernon. If CHSRA nonetheless proceeds with the 26th Street location, the Chamber strongly recommends that the Hobart Expansion be redesigned to **retain and extend 26th Street through the Pennington Way overpass to Bandini Boulevard**. Preservation of this connection is essential to maintaining efficient goods movement, supporting Vernon's businesses and workforce, and avoiding unnecessary regional transportation impacts.

1105 The Chamber also remains concerned about the proposed expansion of BNSF's Malabar Yard as part of the Los Angeles County Metropolitan Transportation Authority's ("Metro") LINK Union Station ("LINK US") Project. The Chamber strongly opposes the inclusion or facilitation of expanded freight rail facilities without comprehensive environmental review and enforceable mitigation. Under thorough review, the Draft EIR/EIS Project is closely interrelated with LINK US, and the cumulative impacts of these projects must be fully disclosed and analyzed.

1106 For all of the foregoing reasons, the Vernon Chamber of Commerce finds that a Light Maintenance Facility would be better served at 15th Street in the City of Los Angeles, thereby avoiding further economic upheaval and environmental impacts to the Vernon community. Vernon Chamber respectfully requests that CHSRA substantially revise and recirculate the Draft EIR/EIS to address the deficiencies identified in these comments and in the detailed analyses submitted by other stakeholders. The Chamber supports the concept of high-speed commuter projects, but not at the cost of undermining a vital employment center and goods-movement hub.

Thank you for the opportunity to comment. The Chamber remains willing to engage constructively with CHSRA to identify feasible alternatives that allow the Project to move forward while protecting Vernon's businesses, workforce, and regional economic role.

Respectfully submitted,

Marisa Olguin, President / CEO

Vernon Chamber of Commerce

2724 LEONIS BOULEVARD • VERNON, CA 90058 • P 323 583 3313 • F 323 583 0704

23.29 Response to Submission 013862 (Marisa Olguin, Vernon Chamber of Commerce, Feb 3, 2026)

23.29.1 1101

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

The commenter asserts that the analysis in the Draft Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS) is lacking, but does not provide specific explanations. Impacts on the economy including jobs, business displacements and relocations, school district funding, property value, property tax losses, and county and city sales tax are discussed in Section 3.12, Socioeconomics and Communities. Impacts on the roadway network, safety, hazardous materials, and air pollution are addressed in Sections 3.2, Transportation; 3.11, Safety and Security; 3.10, Hazardous Materials and Wastes; and 3.3, Air Quality and Global Climate Change, of the Draft EIR/EIS, respectively, with appropriate mitigation measures proposed where the project would result in construction or operational impacts. Chapter 5, Community Analysis, summarizes these impacts at the block group level and evaluates whether any minority or low-income communities would experience disproportionately high or adverse project effects.

23.29.2 1102

The commenter notes that Vernon City Council adopted a resolution opposing the high-speed rail (HSR) project in 2017. Refer to Section 2.5.2, Range of Potential Alternatives Considered and Findings, for a summary of HSR alternatives considered since 2009.

As described in Impact SO-3 in Section 3.12, 37 businesses (19 commercial and 18 industrial) would be displaced, for a total of 911 displaced employees (refer to Draft EIR/EIS Table 3.12-25). Moreover, as presented in Tables 3.12-27 and 3.12-28, there is a surplus of suitable industrial replacement sites, but a deficit (16) of suitable commercial replacement sites. 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 site in Vernon, suitable relocation sites 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.

23.29.3 1103

The Authority acknowledges the City of Vernon's concerns regarding the design of 26th Street, including potential impacts on goods movement and traffic. Regarding concerns about traffic, the comment does not identify a transportation impact under the California Environmental Quality Act (CEQA). Vehicle delay and level of service are not considered significant environmental impacts (refer to Public Resources Code Section 21099 and State CEQA Guidelines Section 15064.3(b)(1)); therefore, no further response is required for the purposes of CEQA. Traffic impacts were evaluated under the National Environmental Policy Act (NEPA) 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 and other parties. Given the current status of the Los Angeles to Anaheim Project Section (project section), which has no current funding to advance design or begin 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.

Regarding concerns about impaired emergency access, Impact SS-2 was revised in 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 to acknowledge that the realignment of 26th Street in Vernon could result in increased travel time along Bandini Boulevard, as well as increased travel time from rerouting from 26th Street to Bandini Boulevard. Refer to Chapter 16 of the Final EIR/EIS for these revisions. As stated in Chapter 16, although there would be changes in vehicle circulation and potential increases in travel times, they would not impair the city's ability to provide emergency response services.

23.29.4 1104

The commenter asserts that impacts were inadequately analyzed but does not provide specific concerns. Impacts on traffic, emergency response and safety, air quality, and noise and vibration are addressed in Sections 3.2, 3.11, 3.3, and 3.4, Noise and Vibration, of the Draft EIR/EIS, respectively, with appropriate mitigation measures proposed where the project would result in construction or operational impacts. The analysis includes construction and operational effects of the 26th Street light maintenance facility (LMF) and modifications to Hobart Yard. Goods movement efficiency is not evaluated as an impact under CEQA and NEPA, but traffic circulation is evaluated in Section 3.2.

Refer to response to comment #1103 above for a description of revisions made to Section 3.11 regarding emergency response in Vernon. The Authority has also revised Section 3.2 to clarify the timing of and coordination needed for traffic mitigation measures. Refer to Section 16.5.11 and Section 16.5.2, Section 3.2: Transportation, in Chapter 16 of the Final EIR/EIS for these revisions.

The commenter's preference for the selection of the 15th Street LMF is noted; however, the assertion that the selection of the 15th Street LMF would avoid introducing further concentration of heavy rail infrastructure and associated impacts within Vernon is inaccurate. Section 2.6.4.5, 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 required. Shared Passenger Track Alternative B would have the same modifications to freight tracks and facilities as Shared Passenger Track Alternative A, except for one difference at Hobart Yard. Because there would not be LMF lead tracks or yard tracks running through BNSF Railway's existing container parking areas, Shared Passenger Track Alternative B would displace slightly less container parking compared to Shared Passenger Track Alternative A. Figure 2-77 in the Draft EIR/EIS illustrates Hobart Yard improvements under Shared Passenger Track Alternative B, if the 15th Street LMF was the selected alternative.

Note that although the 26th Street LMF would not be included under Shared Passenger Track Alternative B, the realignment of 26th Street would still occur. Regarding the request to redesign 26th Street, refer to response to comment #1103 above.

23.29.5 1105

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

The Draft EIR/EIS analyzes the cumulative impacts of the Link Union Station Project, which includes Malabar Yard, and the project section in Section 3.19, Cumulative Impacts. Tables 3.19-7 and 3.19.8 summarize the cumulative impacts for construction and operations, respectively.

23.29.6 1106

Refer to response to comment #1104 above for an explanation as to why the impacts in Vernon are not related to the LMF location, but rather to the modifications at Hobart Yard. The commenter asserts there are deficiencies in the Draft EIR/EIS as raised in comments #1101 to #1105; refer to responses to comments #1101 to #1105 above for how economic and environmental impacts were analyzed in the Draft EIR/EIS, with mitigation measures proposed where the project would result in construction or operational impacts. The Authority has carefully considered the Vernon Chamber of Commerce's comments, and made revisions in the Final EIR/EIS to address the city's concerns regarding emergency response and traffic mitigation measures; refer to responses to comments #1103 and 1104 above for a description of these revisions. The Authority has determined that recirculation is not necessary because the revisions merely amplify and clarify the text. The Authority

appreciates the city's willingness to engage on this project; refer to response to comment #1103 above for a description of an alternate design of 26th Street that would be explored in later phases of design.

Los Angeles to Anaheim - RECORD #013863 DETAIL

Status:	Action Pending
Record Date:	02/03/2026
Interest As:	Business and/or Organization
Full Name:	Adriana Rizzo

Stakeholder Comments/Issues:

Dear Southern California HSR staff, See attached comments from Californians for Electric Rail, Move LA, and the Transit Coalition on the California High-Speed Rail Project - Los Angeles to Anaheim Project Section Draft EIR. Best, Adriana Rizzo Californians for Electric Rail

February 3rd, 2026

California High-Speed Rail Authority
Attn: Stefan Galvez-Abadia, Director of Environmental Services
770 L Street, Suite 620
Sacramento, CA 95814
Stefan.Galvez@hsr.ca.gov

Re: California High-Speed Rail Project - Los Angeles to Anaheim Project Section Draft EIR

Dear Mr. Galvenz-Abadia,

1012 The undersigned transit organizations, Californians for Electric Rail (CER), Transit Coalition, and Move LA are in strong support of either Shared Passenger Tracks Alternative in the California High-Speed Rail Project - Los Angeles to Anaheim Project Section Draft EIR and the advancement of the project. High-Speed Rail will greatly expand zero-emissions travel options in Southern California, encourage electrification of other modes beyond the project, and reduce driving and flying and their associated social harms.

1013 The blended system proposed in the DEIR supports electrification of other modes, with broad benefits beyond the High-Speed Rail project. In particular, Metrolink electrification would have large service and ridership benefits, as has already been seen with Caltrain. According to our calculations, electrification (and level boarding) of Metrolink between Burbank, Anaheim, and beyond would make most trips faster than driving.[1] We are encouraged to see the 2031-2037 construction schedule, and encourage the adoption of the Los Angeles-Anaheim segment (in addition to the already approved Burbank-Los Angeles segment) as an early action project that could be completed in parallel or prior to connecting sections of the project. Because freight trains could also access electrified track in non-peak hours, this also provides an opportunity to pilot zero emissions freight locomotives powered by overhead catenary.

1014 We support the expansion to four mainline tracks on the corridor, expanding passenger capacity while maintaining existing freight capacity. However, we recommend that all four tracks be electrified, rather than the two tracks as in the DEIR. This serves two purposes. Firstly, it allows for additional capacity, pending agreement with BNSF, for additional electrified Metrolink service. The 2024 State Rail Plan calls for two high speed trains, four regional trains, and three non-high-speed intercity trains per hour in 2050 between Los Angeles and Fullerton. Assuming all service is electrified, this would be difficult to deliver with only two electrified tracks. Even if the other two tracks remain prioritized for freight, they must be designed to allow passing for reliable electric passenger service. Bypass tracks for limited stop HSR service must be included.

[1] https://calelectricrail.org/wp-content/uploads/2025/09/electrolink-final-final.pdf

1015 Secondly, electrifying all four tracks allows for zero emissions freight operations, mitigating many of the impacts of the freight capacity enhancements associated with the project. BNSF's proposed Barstow International Gateway (BIG) project will launch port-Barstow shuttle service with a captive fleet that will travel along the right of way studied in this DEIR. If the freight tracks were electrified in addition to passenger tracks, BNSF could operate overhead dual mode diesel-electric or battery electric locomotives in zero emissions mode from Los Angeles to Fullerton, reducing emissions in a region heavily burdened by diesel pollution from goods movement. Electrification of freight tracks on this segment would also incentivize the development of fully zero emissions, overhead catenary-powered operations all the way to Barstow for the shuttle service, as discussed in CER's comments on the BIG EIR.[2]

1016 Additionally, Anaheim station designs must accommodate extension to Irvine and further South. . The original CAHSR study included an option for an Irvine terminal station, and an Irvine station is explicitly mentioned in Proposition 1A. An Irvine terminus would simplify operations by reducing interference between HSR and Metrolink. The proposed Anaheim terminal is a highly constrained location which causes conflicts between HSR and Metrolink operations and its arrangement requires multiple slow-speed turnouts. Designing for an Irvine extension would also leave options open for high-speed rail service to San Diego via the coastal route, assuming the completion of the San Clemente and Del Mar coastal bypasses.

In summary, we strongly support either Shared Passenger Tracks alternative, with the following modifications: electrifying all four tracks, and modifying the Anaheim station design to allow for a future extension to Irvine. We hope the project will move forward quickly and encourage the adoption of as many project elements as possible as early action projects.

Sincerely,
Adriana Rizzo
Founding Member, Californians for Electric Rail

Bart Reed
Executive Director, The Transit Coalition

Eli Lipmen
Executive Director, Move LA

CALIFORNIANS for ELECTRIC RAIL

The Transit Coalition

MOVE LA
A PROJECT OF COMMUNITY PARTNERS

[2] https://calelectricrail.org/wp-content/uploads/2026/01/BIG-EIR-Comment-Letter-CER.pdf

23.30 Response to Submission 013863 (Adriana Rizzo, Californians for Electric Rail, The Transit Coalition, and Move LA, Feb 3, 2026)

23.30.1 1012

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

23.30.2 1013

The commenter encourages the electrification of the Los Angeles to Anaheim Project Section as an early action project. Although electrification is not planned as an early action project, the California High-Speed Rail Authority (Authority) would continue to coordinate with the other operating agencies to identify ways to deliver project benefits as soon as funding is available. The Authority continues to evaluate different scenarios for connections to the north and south to determine how to deliver high-speed rail (HSR) service in cost-effective ways. No revisions have been made to the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) in response to this comment.

23.30.3 1014

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-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 expresses support for all four tracks in the corridor to be electrified. Note that Metrolink currently does not have plans to switch to electrified vehicles, and electrifying Metrolink is outside of the purpose and need for the HSR project.

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

23.30.4 1015

The commenter states that electrifying all four tracks would reduce greenhouse gas emissions from diesel freight rail. The Authority does not have authorization over BNSF Railway (BNSF) and other freight operators' service and operations. BNSF has not indicated any plans to electrify its vehicle fleet. If it chooses to do so in the future, it would be responsible for electrifying the freight tracks dedicated for its use within the corridor to support its operations.

23.30.5 1016

The commenter requests that the HSR project continue south to Irvine. The Los Angeles to Anaheim Project Section is part of Phase 1 of the HSR system, which provides HSR service between San Francisco and Los Angeles/Anaheim. Regarding the request to serve Irvine, 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* identified a potential route between Anaheim and Irvine, but it was eliminated because of potential high costs and complexities with construction and right-of-way. Additional studies would be prepared for Phase 2 in the future when funding is available. No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013873 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Business and/or Organization
Full Name:	Jesse Flores

Stakeholder Comments/Issues:

Good evening, Please find attached my public comment for the Los Angeles to Anaheim Draft EIR/EIS. If any additional information is required, please let me know. Thank you. Best, Jesse Flores (He, Him, His) Executive Director 562-356-7476 norwalkunides.org

Norwalk Unides
P.O. Box 1621
Norwalk, CA 90651

February 3, 2026

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

RE: Los Angeles to Anaheim Draft EIR/EIS Comment

Dear Mr. Choudri,

0879

On behalf of Norwalk Unides, I am submitting this public comment letter urging the California High-Speed Rail Authority to place an intermediate Norwalk/Santa Fe Springs station as part of its high speed rail (HSR) segment between Downtown L.A.'s Union Station and the Anaheim Regional Transportation Intermodal Center (ARTIC) in Anaheim. As a local nonprofit organization advocating for active and sustainable transportation across Southeast Los Angeles County, Norwalk Unides is excited for the arrival of HSR within the State of California and region. This first phase of the HSR will provide Norwalk residents and others from nearby communities with improved access to other regions across the State, helping reduce emissions from vehicles and airline flights traveling between Southern and Northern California.

However, even more emissions would be reduced with the placement of an intermediate station at the existing Norwalk / Santa Fe Springs Station, as it will provide a direct, one-seat connection to LAX via Los Angeles Metro's planned extension of the C Light Rail line. It will also open an additional gateway in Southeast Los Angeles County to make the HSR system more practical and equitable for a wide variety of residents and businesses in Southeast LA, South LA, the South Bay, the Westside, and northern portions of Orange County.

We applaud the arrival of HSR to the State, as it will improve access to quality jobs across the State, while reducing emissions by lessening reliance on automobiles and flights for travel between regions. We look forward to this project becoming a reality and we stand ready to support however possible. Thank you for your attention to this significant project.

Sincerely,

Jesse Flores

Jesse Flores
Executive Director
Norwalk Unides

23.31 Response to Submission 013873 (Jesse Flores, Norwalk Unides, Feb 3, 2026)

23.31.1 0879

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

Los Angeles to Anaheim - RECORD #013876 DETAIL

Status:	Unread
Record Date:	02/03/2026
Interest As:	Business and/or Organization
Full Name:	Grace Peng

Stakeholder Comments/Issues:

0880

I think it is really important to build an intermediate station collocated with the Metrolink station at Norwalk/Santa Fe. LA Metro C Line goes from LAX MTC to Norwalk. Through Measure M, we have funding to close the 2.8 mi gap between the existing Norwalk station (at the interchange of I-105 and I-605) and the Metrolink Norwalk/Santa Fe station. You don't need a large parking lot when you have high quality transit to your station. This would provide a 1-seat fast ride of ~30 minutes between HSR and LAX. That would make our system world class. Build the intermediate station at Norwalk/Santa Fe! Grace Peng, PhD Natural Resources Director League of Women Voters of Los Angeles County

23.32 Response to Submission 013876 (Grace Peng, League of Women Voters of Los Angeles County, Feb 3, 2026)

23.32.1 0880

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

Los Angeles to Anaheim - RECORD #013934 DETAIL

Status:	Action Pending
Record Date:	02/10/2026
Interest As:	Business and/or Organization
Full Name:	Kee Hong Saw

Stakeholder Comments/Issues:

1814 To Whom It May Concern, On behalf of the HOA Board representing residents located along the rail corridor between E La Palma Avenue and E Sycamore Street, we submit this formal comment regarding the LA–A Project Section Draft EIR/EIS. We are deeply concerned that increased rail activity, construction traffic, and long-term vibration will pose a significant risk to existing residential foundations and structural integrity in our neighborhood. The Draft EIR/EIS does not adequately analyze or mitigate vibration-related impacts to nearby homes, including potential settlement, cracking, and long-term structural damage. We strongly request that the Final EIR/EIS include site-specific vibration and structural impact studies for this section of the corridor, enforceable mitigation measures, ongoing monitoring, and clear responsibility for any resulting damage. Protecting existing residential communities must be a priority as this project moves forward. Sincerely, Board of Directors Arroyo Townhomes Owners Association Sent from my iPhone

23.33 Response to Submission 013934 (Kee Hong Saw, Arroyo Townhomes Owners Association, Feb 10, 2026)

23.33.1 1814

Vibration damage criteria are included in Table 3.4-8 of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS), and potential structural damage effects from vibration are discussed under Impact N&V-2 in Section 3.4.6.3, Project Impacts.

For residences along the rail corridor between E La Palma Avenue and E Sycamore Street, there would be the potential for vibration damage to residential buildings from at-grade rail construction activities, including the use of excavation equipment, which could affect Category III (nonengineered timber and masonry) buildings at distances of up to 15 feet as indicated in Table 3.4-14 of the Draft EIR/EIS. Because there are no residences in this section of the corridor that would be within that distance from construction, vibration damage impacts from project construction are not anticipated. Similarly, no vibration damage impacts are anticipated from short-term exposure to vibration from construction traffic or from long-term exposure to high-speed rail train operations, which would generate ground-borne vibration levels below damage thresholds at residences along the corridor.

The California High-Speed Rail Authority would implement N&V-MM#4 (Implement Operational Vibration Mitigation Measures) to address potential vibration impacts during operation. These could include measures such as vehicle suspension alterations, special track support systems, building modifications, and buffer zones.

Site-specific construction vibration analysis will be carried out during project design when detailed construction plans are available and appropriate actions will be incorporated during construction as needed. To minimize the effects of construction-related vibration on sensitive receptors, the Authority would implement N&V-MM#2 (Construction Vibration Mitigation Measures). This mitigation measure requires preparation of vibration technical memoranda by the contractor prior to impact pile driving within 80 feet of buildings, use of alternative construction methods where feasible, preconstruction condition surveys, and vibration monitoring where sensitive receptors are present. In addition, the contractor will arrange for the repair/restoration of damaged buildings to pre-impact condition or will pay compensation to the property owner. After implementation of N&V-MM#2, the impact under the California Environmental Quality Act related to temporary exposure of sensitive receptors to vibration during construction would be less than significant.

Los Angeles to Anaheim - RECORD #013947 DETAIL

Status:	Action Pending
Record Date:	02/11/2026
Interest As:	Business and/or Organization
Full Name:	Craig Preston

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: Craig Preston

DATE: 1/12/2026

MEETING LOCATION: Anaheim

AFFILIATION: Citizens' Climate Lobby

ADDRESS: 7

EMAIL: v'gmail.com

PHONE:

CITY: Costa Mesa

STATE: CA

ZIP: 92626

*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.

City of Burlingame is in up in the Bay Area. They knew years ago that they needed a great separation. And they have like the number one risky crossing in the state. It's going to cost them billions of dollars to fix this thing when they could have done it for hundreds of millions.

That's all.

MS. LABRADO: Thank you.

Next up we have Craig Preston, followed by Miguel Gaston. I apologize if I got your last name wrong.

1671 MR. PRESTON: Hello, I'm Craig Preston. I live in Costa Mesa; I work in Anaheim. I live right near the tracks and so see the trains coming by all the time, but glad to see this proposal moving forward.

Thank you for the last speakers mentioning about "gateways." That's a new term for me to even to learn about that. And I used to live in Anaheim near one of those gateways that honked every time. And I remember the neighbors say, "You'll get used to it." I never got used to it. But now they've built a way over it and how -- what a relief. So I think we'll benefit in many different ways.

So thank you for your presentation

1671

educating us, taking the time to do this so that we can have a voice and be involved with this. Also, thank you for having ASL here. My brother's deaf, and I'm glad my brother would be able to benefit and be part of this, so beneficial there.

I'm a climate change advocate. I volunteer with a group called "Citizens' Climate Lobby." So we're pushing to lower emissions and remove carbon. We've gotten to the point where we're burning so much we need to take it out of the air now, and so it's going to be really costly.

So there's a saying, "an ounce of prevention is better than a pound of cure." And so thank you. Even though this will be expensive, it's going to be a whole lot less expensive than the curing the problems of carbon pollution in our atmosphere. And so thank you that it was mentioned in the presentation about climate change and that this is something that we are doing to address that, not only with CO2 but with other gases. And I'm glad that was mentioned.

Just in terms of short-term versus long-term impact, I think we as a people tend to think short term. "What's my next paycheck?" But I'm glad we're considering. At one point there was a child

1671

crying in the audience, and I thought that child is the one that's probably going to benefit the most from this thing. And right now I recruit people to go to Sacramento often, so we'd have a voice in Sacramento. I'm looking forward to now having a much easier time to get them to go to Sacramento with me because right now it's pretty hard to get them up there.

1672

A thought is just to educate us about other places that have done something similar. I think Japan and there's just other places. This gentleman mentioned the northeast. It's just nice to know that we're not doing this fresh. We have other people that have been successful. I would say we're doing it late, and -- but better -- sooner the better. And I look forward to using it myself and having more of a voice in Sacramento as we get people up there. So thank you for both having a short-term and a long-term perspective.

MS. LABRADO: Thank you.

Okay, we have Miguel, who's up next, followed by Adrian Stephen.

MR. GASTON: Hello, my name is Miguel. I live in the Fullerton area, and I try to use the Fullerton Station as much as I can to commute to LA.

I really appreciate what you guys are

23.34 Response to Submission 013947 (Craig Preston, Citizens' Climate Lobby Orange County, Feb 11, 2026)

23.34.1 1671

The California High-Speed Rail Authority acknowledges the commenter's appreciation for the public outreach done for this project, and the reduced greenhouse gas emissions as part of the project's operations. 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.

23.34.2 1672

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

Los Angeles to Anaheim - RECORD #013960 DETAIL

Status:	Action Pending
Record Date:	02/11/2026
Interest As:	Business and/or Organization
Full Name:	James Placek

Stakeholder Comments/Issues:

[Please refer to the attached transcript for the demarcation of oral comments delivered by this submitter during the public hearing.]

P R O C E E D I N G S

2324 MR. PLACEK: My comment is on the Santa Fe Springs Station. The station that is proposed is going right down the middle of a dump. And the cost of this station is going to be prohibitive, maybe two, three times the original cost that if it was built on standard ground.

The track could be realigned, going parallel or along the edge of the dump. And a platform could be installed at a much lesser cost and serve the purpose of what you're trying to -- to come up with.

2325 The Rail Authority needs the money savings that this would generate. And I would strongly suggest that you look into doing the realignment closer to the main line of the existing tracks. The -- if you -- if you don't need this station, you've got Fullerton, which is eight and a half miles away; and you could do away with the station and the platform altogether.

If you have any comments or you want any additional information, give me a call or write to our company at 12771 East Imperial Highway. Our phone number is area code (562) 944-7985. You can either ask for Jim Placek or Sergio Varela.

Okay. I hope --

MS. LABRADO: Okay. The time is 6:30, and we're going to open our public hearing. Before we go to our speaker cards, we're going to ask our panel to introduce themselves tonight to you.

MS. DICAMILLO: Good evening. Thank you for staying for the hearing. My name is LaDonna DiCamillo. I'm regional director for the California High-Speed Rail Authority.

MR. BONSTEAD: Hey all, I'm Tyler Bonstead. I'm the project manager for the consultant team preparing the engineering and environmental for the Authority.

MR. CHANNELL: Josh Channell. I'm the environmental manager for the consultant team.

MR. ROTHENBERG: Scott Rothenberg. I'm the environmental program manager for the high-speed rail on this project section.

MS. WU MORRI: All right. This microphone likes me better. Minming Wu Morri, environmental counsel at High-Speed Rail.

MS. LABRADO: Okay, just a quick reminder. You've heard this before, but to provide public comment tonight, we ask that you fill out a speaker card and we'll call you up. What I will do is

23.35 Response to Submission 013960 (James Placek, J. A. Placek Construction, Feb 11, 2026)

23.35.1 2324

Refer to Standard Response LAA-Response-GENERAL-03: Funding and Project Costs, in Chapter 18, Standard Responses.

The commenter asserts that the project would be built on a landfill in the vicinity of the Norwalk/Santa Fe Springs Metrolink Station. Potential environmental concern (PEC) sites are discussed in Section 3.10, Hazards and Hazardous Materials, of the Draft Environmental Impact Report (EIR)/ Environmental Impact Statement (EIS). Section 3.10.5.9, Landfills, describes the PEC sites in the vicinity of the Norwalk/Santa Fe Springs Metrolink Station, which is one of the locations considered for the high-speed rail station option. There is one active PEC site, Neville Chemical Corporation, that is on the Cortese List in the vicinity of the station area, but there are no listed landfills or dumps in the vicinity of this station area in any relevant databases. The California High-Speed Rail Authority conducted supplemental outreach efforts in spring 2026 to obtain additional information from the commenter regarding the referenced landfill. However, no additional insight has been provided to date. Nevertheless, Section 3.10.5.9 acknowledges that there is potential for the presence of unpermitted historical landfills or otherwise inactive landfills in the vicinity of the project alignment, and Impact HMW-3 states that not all hazardous materials contamination is known and mapped. The project includes multiple impact avoidance and minimization features to minimize potential impacts related to release of hazardous materials from both known and unknown sites of concern, 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#6, Spill Prevention; HMW-IAMF#9, Environmental Management System; and GEO-IAMF#3, Gas Monitoring. No revisions have been made to the Draft EIR/EIS in response to this comment.

Costs of the project are summarized in Chapter 6, Project Costs and Operations, of the Draft EIR/EIS, including the estimated capital, operations, and maintenance costs for each build alternative and design option, including funding and financial risk.

23.35.2 2325

The commenter states that the tracks should be realigned closer to the existing tracks near the Norwalk/Santa Fe Springs Metrolink Station. Because of the existing corridor’s geometry, shifting the tracks closer to the existing corridor would not be possible. The existing Metrolink platforms are in an area where the corridor curves, and any new platforms would need to be on a straight section of track, which would be challenging to implement along the existing curved corridor. The tracks would also transition from the western side to the eastern side to avoid impacts on the BNSF Railway freight yards farther south along the corridor. No revisions have been made to the Draft EIR/EIS in response to this comment.

Los Angeles to Anaheim - RECORD #013972 DETAIL

Status:	Action Pending
Record Date:	02/11/2026
Interest As:	Business and/or Organization
Full Name:	Don Paul

Stakeholder Comments/Issues:

[Please refer to the attached transcript for the demarcation of oral comments delivered by this submitter during the public hearing.]

scan the QR code. We can flash the the previous slide for a bit so folks can access the QR code. That would be great. Thank you. So we will leave this up for a bit, and we will check for raised hands.

All right. Looks like we have another raised hand. Okay. Don Paul, this is -- you're up next. You should be able to unmute yourself now.

1921

MR. PAUL: Yes. My name is Don Paul. I'm a commercial real estate broker and investor owning property on the Anaheim corridor, specifically between Ball Road and Cerritos. Can you hear me okay?

MS. HERNANDEZ: Yes, Don, we can hear you.

MR. PAUL: Okay, great. So the issue in that particular corridor is the city of Anaheim has a homeless shelter there that services a lot of transient people. Okay, great. The problem is they're using the rail corridor as their access to the surrounding neighborhoods, including the industrial neighborhood along Allec Street, A-L-L-E-C Street, that has a large amount of frontage in the backyard areas to the current railway.

The issue is that it's been a game of Whac-A-Mole trying to get the people for -- the -- the transient homeless people who are basically stealing

1921

copper wire, breaking into buildings, camping out in front of, you know, businesses, doorsteps, and so on, to get them to stop doing that. So we've, you know, made defenses higher. They simply cut through them.

And what we propose is that the high-speed rail and/or the railway in combination with the freight rail that goes through there and the local commuter rail come along and come up with a solution to keep the people off the tracks, the homeless people off the tracks, the criminals off the tracks, and the criminals out of the neighborhoods that are all along the tracks.

We can't seem to figure it out. We've changed lighting, we've added security cameras, and it doesn't make any difference. They've come in through the roof. They've come in through the -- the doorways. They've, again, stolen significant dollars worth of electrical wiring outside the buildings, disabling the businesses for a day or two while they have to get their compressors rewired.

So we expect this situation to be improved, and it is absolutely a consequence of having the rail, and having more rail is just going to cause even more problems. And sooner or later, somebody's going to get hurt. I yield.

MS. HERNANDEZ: Thank you, Don, for your comment.

All right. Up next we have Gary. Gary, please provide your first name and last name and your comment.

MR. ULWELLING: Hi. Can you hear me?

MS. HERNANDEZ: Yes, we can hear you, Gary.

MR. ULWELLING: Hello. My name is Gary Ulwelling. I want to voice my approval of this project. Let's get it done. I yield the rest of my time.

MS. HERNANDEZ: Thank you, Gary, for your comment.

All right. I do not see any other folks in the queue. Reminder, we will be open today until 7 p.m. If you're interested in providing a verbal comment tonight, please use the "Raise Hand" feature in Zoom, and we will call in the order that we see the -- the raise -- the hands being raised.

We also have the option of providing a written comment by following the link that you see on screen right now for the online comment form. If you're interested in providing -- virtual connectivity interruption -- comments -- virtual connectivity

Don, you're up next. Please go ahead, Don, and provide your first name, last name, and provide your comment.

1922

MR. PAUL: Yes. Don Paul, property owner 1332 South Allec, A-L-L-E-C, Street in Anaheim, 92805. Thank you very much for providing the ArcGIS World Geocoding Service map, which shows the affected areas. It's showing our property is partially affected parcel, partial acquisition or permanent easement.

And it appears that part of our property is going to become -- is going to be -- I guess we're going to move the fence and make our parking and yard area and usable area behind our industrial building smaller. How do we determine what that means? I yield for your answer.

MS. HERNANDEZ: Thank you, Don, for your comments. A reminder. Today, we're -- it's a listening session, and panel members will not respond to comments during this segment. But if you have any questions, we welcome you to email the -- the project website. So we will share that on screen right now so you have access to that, and we can help you get you the information that you need in order to formulate your comment.

23.36 Response to Submission 013972 (Don Paul, Beta Allec Two LLC, Feb 11, 2026)

23.36.1 1921

The California High-Speed Rail Authority (Authority) acknowledges the commenter's concern regarding existing trespassing activity and security conditions along the rail corridor. Section 3.11, Safety and Security, of the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) evaluates potential safety and security issues associated with construction and operation of the proposed project, including unauthorized access to rail facilities.

Section 3.11 identifies Impact SS-16, which addresses potential security risks associated with project facilities and operations. As discussed in this section, the project would be designed as a generally access-controlled system, and the Authority requires preparation and implementation of a Safety and Security Management Plan (SS-IAMF#2, Safety and Security Management Plan) to specify how applicable requirements, plans, programs, and design guidelines would be considered to protect safety and security.

During final design, the Authority would conduct threat and vulnerability assessments, the results of which would inform the development of a System Security Plan and a Security and Emergency Preparedness Plan prior to operations, consistent with federal and state requirements.

It should be noted that Impact SS-16 in Section 3.11.6.3, Project Impacts, of the Draft EIR/EIS has been revised to correct a typographical error, clarifying that a threat and vulnerability assessment would be performed as part of SS-IAMF#3 and not SS-IAMF#2. 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 this revision.

23.36.2 1922

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

For Assessor's Parcel Number 082-140-31 (1332 S Allec Street), the project would require the permanent acquisition of approximately 2,242 square feet of a 23,035-square-foot parcel, located along the eastern edge of the property; refer to Volume 3.1, Part 2, sheet RW-M1617 of the Draft EIR/EIS for details on the proposed partial acquisition. The affected area consists primarily of a surface parking lot and enough of the surface lot would remain available for continued use by the businesses on the site. Detailed site-specific design, including final parking configuration and circulation, would be evaluated during subsequent project phases. The Authority has determined at this time that a full acquisition is not needed, but would support any displaced business owners with relocation assistance. As described in Section 3.12, Socioeconomics and Communities, of the Draft EIR/EIS, the Authority would incorporate SOCIO-IAMF#3, Relocation Implementation Plan, to 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.

Los Angeles to Anaheim - RECORD #013974 DETAIL

Status:	Action Pending
Record Date:	02/11/2026
Interest As:	Business and/or Organization
Full Name:	Eli Lipmen

Stakeholder Comments/Issues:

[Please refer to the attached transcript for the demarcation of oral comments delivered by this submitter during the public hearing.]

to the south of the existing bridge at Lewis there, and that would be used to store high speed trains servicing the Anaheim Station. Lewis Street would return to its existing configuration just south of Ball Road.

MS. HERNANDEZ: Thank you, Tyler. Let's break here. It looks like we have a few folks in the queue.

All right. Eli Lipmen, you're up next. Please provide your first name, last name, and you can proceed with your comment. And panel members, please, you can go back on camera. Thank you.

MR. LIPMEN: Yeah. Can you hear me?

MS. HERNANDEZ: Yes, we can hear you.

1924

MR. LIPMEN: Hi. My name is Eli Lipmen, representing Move LA and Move California. We are very excited about the opportunity to get High-Speed Rail in Southern California and excited that this will be the final EIR to be approved for the transportation system for our High-Speed Rail system.

So we're looking forward to its approval and support its approval and -- and eventual funding so that we can start to get under construction, create good-paying jobs, union jobs here in Southern California, and -- and really create

1924

robust public transportation that can access to our existing transit system, which we help to fund with Measure R and Measure M.

Like to see more of the high-speed rail funding go towards projects like this. And yeah. We -- we're excited. We -- we want to support moving it forward. We're big supporters of the Link US project. Glad to see that part of the conversation here and the -- and the proposal.

You know, I -- I think -- so we want to see that accelerated, obviously, so we're looking forward to you approving this so that the funding for

1925

that project can also be provided. I think we definitely are very interested in seeing and -- and citing a station in Pico Rivera. We think not only is it a hub for manufacturing and industry, but it also serves a lot more communities than I think some of the other options that have been proposed. So we'd love to see a station at Pico Rivera.

1926

And then, you know, I think there's some concern about the level of construction being done in the Orange County section, considering that it really won't be High-Speed Rail between the two final stations and ending at the ARTIC station.

So I think there's a need to either

1926

identify ways to make it constructed in a way so that you can get high-speed speeds between -- between the Orange County stations or engineer it in a way where it -- it just doesn't -- it doesn't feel really necessary to have a high-speed alignment if you're not going to achieve those speeds due to, you know, freight conflicts, due to curves, due to other factors.

So I -- I think it's really important to consider that when we're thinking about what kind of service people are going to want to see and what options they're going to use and utilize if it just goes at the speed of, say, a Metrolink service train. That's -- that's my comment. Thank you very much.

MS. HERNANDEZ: Thank you, Eli, for your comment.

All right. If you are interested in participating in today's public hearing, please raise your hand using the Zoom function and we will call on your name.

All right. While we wait, I think we can go back to the MeetHSRSoCal site and go over some of the remaining visual simulation videos. All right. Thanks, Taylor. I think we can proceed with the grade separation at State College Boulevard.

23.37 Response to Submission 013974 (Eli Lipmen, Move LA and Move California, Feb 11, 2026)

23.37.1 1924

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

23.37.2 1925

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

23.37.3 1926

Refer to Standard Response LAA-Response-Chapter 1 P&N-01: Project Benefits, in Chapter 18.