

Submission 764 (Paul Dyson, Rail Passenger Association of California and Nevada (RailPAC), July 30, 2020)



P.O. Box 22344
San Francisco CA 94122
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RailPAC Comments
High Speed Rail Burbank – Los Angeles EIR-EIS

Attn Burbank to Los Angeles Draft EIR/EIS Comment
355 South Grand Avenue Suite 2050
Los Angeles, CA 90071

764-1175

Angeles hub will be one of the keys to the success of the system and it is a serious mistake to design in this inefficiency. Furthermore, the above ground siting of the tracks impacts nearby residences and precludes the construction of new housing in the vicinity. The need for higher speed approaches and the mandated point to point schedules clearly call for a "straight line" approach at both the north and south ends of the station.

Contact:

Paul Dyson, Vice President, Southern California
pdyson@railpac.org

764-1171

The Rail Passenger Association of California and Nevada is a nonprofit, volunteer advocacy group for passenger rail, in existence since 1978. RailPAC campaigned for the High Speed Rail ballot measure and strongly supports a modern passenger rail system. The following are our comments on the Burbank – Los Angeles section EIR/EIS:

764-1172

Burbank Station location: Burbank has three Metrolink stations, one of which, Downtown, is also the bus transit center, and another is an Amtrak stop (Burbank Airport South). Siting a station at the Airport fails to provide a convenient interchange between regional rail services and bus routes, and in fact encourages the use of private automobiles to and from the station. This is being done in the expectation that there is a demand for an air connection between other High Speed Rail stations and the airlines serving Hollywood Burbank Airport ("BUR"). A detailed examination of the air services operating at BUR reveals that most of these same services are available from airports at or close to other High Speed Rail stations, e.g. Fresno, San Jose and Bakersfield.

764-1173

In effect, the location of the Burbank station sacrifices local connectivity and convenience for passengers using public transportation in favor of a misplaced belief that there will be demand for air-rail connections with BUR's limited mostly regional air services. The area around BUR is already congested with airport generated traffic, so the HSR station site will have access problems from day one. RailPAC believes that the possibility of a combined HSR, Amtrak, Metrolink and transit hub close to downtown Burbank has been dismissed too hastily and needs to be reexamined. Indeed, given the expected time it will take for HSR to reach Burbank we need to look further out and discuss whether Burbank Airport will be acceptable to the surrounding community. Do we need both High Speed Rail *and* a small regional airport with very limited runways?

764-1174

The dogleg route through Burbank, especially from the point where it intersects with the Coast line (Metrolink Ventura line) has a major impact on residents from there to Burbank Junction. It is unacceptable to grade separate Buena Vista Street for HSR without also separating the regional passenger and freight tracks.

764-1175

RailPAC applauds the fact that HSR construction will result in the elimination of grade crossings between Burbank and Los Angeles. This is long overdue.

RailPAC has strong reservations about the approach to Union Station and the use of the existing train yard area, rebuilt at higher elevation, for HSR platforms. The slow approach to the platforms, involving two near 90 degree curves at each end, negates many miles of high speed running. The lifetime cost of these additional schedule minutes will be significant, including energy consumption, track and train maintenance. The Los

Response to Submission 764 (Paul Dyson, Rail Passenger Association of California and Nevada (RailPAC), July 30, 2020)

764-1171

Refer to Standard Response BLA-Response-GENERAL-04: General Support.

The commenter expresses their support for the HSR project. The commenter's support for the HSR Build Alternative is acknowledged.

764-1172

Refer to Standard Response BLA-Response-Chapter 2 Alt-01: Alternatives.

The commenter questions the planned location of the HSR Burbank Airport Station. The Authority acknowledges this viewpoint; however, it should be noted that the location of the Burbank Airport Station is the culmination of many years of technical analysis and evaluation as described in BLA-Response-Chapter 2 Alt-01: Alternatives. As discussed in more detail in Section 1.1.6 of this Final EIR/EIS, the establishment of an HSR system is intended to augment air travel and other modes, and public transportation investment is intended to link all major forms of transportation and provide better access to airports, among other objectives. Further, Section 1.2.3 of this Final EIR/EIS outlines project objectives that have been defined under CEQA, which include (but are not limited to) maximizing intermodal transportation opportunities by locating stations to connect with local transit systems, airports, and highways, and incorporate the HSR project Section into the intermodal transportation hubs at Burbank and Los Angeles, thereby providing interfaces with airports, mass transit, and highways, resulting in local and regional transit and transportation hubs. Further, Los Angeles Union Station, just one HSR stop south of the Burbank Airport Station, already serves as a transit hub inclusive of Amtrak, Metrolink, Metro rail/bus, and other municipal transit lines. No revisions to this Final EIR/EIS have been made in response to this comment.

764-1173

The commenter asks if both an HSR system and a small regional airport are needed. As discussed in more detail in Section 1.1.6 of this Final EIR/EIS, the establishment of an HSR system is not intended to replace air travel; rather, public transportation investment is intended to link all major forms of transportation and provide better access to airports, among other objectives. Further, Section 1.2.3 of this Final EIR/EIS outlines project objectives that have been defined under CEQA, which include (but are not limited to) maximizing intermodal transportation opportunities by locating stations to connect with local transit systems, airports, and highways, and incorporate the HSR project Section into the intermodal transportation hubs at Burbank and Los Angeles, thereby providing interfaces with airports, mass transit, and highways, resulting in local and regional transit and transportation hubs.

764-1174

Refer to Standard Response BLA-Response-Chapter 2 Alt-01: Alternatives.

The commenter states that the route through Burbank is impactful on residents, particularly from Burbank Junction through the intersection of the Metrolink Ventura line. The HSR alignment evaluated in this Final EIR/EIS has been refined through the Tier 1 and Tier 2 analyses to be as minimally impactful as possible while also meeting overall project objectives, as discussed in more detail in Standard Response BLA-Response-Chapter 2 Alt-01: Alternatives.

The commenter also states that the grade separation at Buena Vista Street should include regional rail tracks as well as HSR tracks. The grade-separation at Buena Vista Street is specific to the HSR crossing because there are existing geometric constraints associated with adjacent UPRR siding track, which has limitations on vertical curvature in order to maintain its ability to store train vehicles on level grade. Therefore, Buena Vista Street would be partially at-grade (for Amtrak and Metrolink) and partially grade-separated (for HSR) to comply with both operational and design criteria associated with relocation to a lower elevation.

Response to Submission 764 (Paul Dyson, Rail Passenger Association of California and Nevada (RailPAC), July 30, 2020) - Continued

764-1175

The commenter expresses concern about the approach to the HSR platforms at Los Angeles Union Station and the need for trains to slow as they approach the platform. As the corridor is a dense, built-out area, the alignment follows the existing rail corridor to minimize impacts.

The commenter also indicates that the above-ground siting of the tracks impacts nearby residences and precludes the construction of new housing in the vicinity. It is assumed the commenter is referring to the tracks at the southern end of Los Angeles Union Station. Those tracks are being built as part of Metro's LinkUS Project, which are also within an existing rail corridor to minimize impacts. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 872 (Michael Tessler, Responsive Homes, August 31, 2020)

Burbank - Los Angeles - RECORD #872 DETAIL

Status : Action Pending
Record Date : 8/31/2020
Submission Date : 8/31/2020
Interest As : Business and/or Organization
First Name : Michael
Last Name : Tessler
Attachments : CA_HIGH_SPEED_RAIL_PUBLIC_COMMENT_MICHAEL_TESSLER.pdf (248 kb)

Stakeholder Comments/Issues :

Hello --

See attached for my public comment regarding the Draft EIR and please confirm receipt.

Thank you
Michael Tessler

--

Michael Tessler
Responsive Homes <<http://responsivehomes.com/>> / *[@responsivehomes](https://instagram.com/responsivehomes/)
<<https://instagram.com/responsivehomes/>>*
818.406.1224
DRE #01884161



August 30, 2020

To Whom It May Concern:

This letter is intended to be filed as a public comment to the California High Speed Rail Burbank to Los Angeles Project Section Draft Environmental Impact Report/Environmental Impact Statement.

I am a longtime resident of Cypress Park, former Chair of the Greater Cypress Park Neighborhood Council, and the owner of an architectural design and real estate development company operating in neighborhoods of Atwater Village, Glassell Park, Cypress Park and Elysian Valley.

872-1590

I support the creation of the California High Speed Rail, but I am deeply concerned about its impacts and lack of consideration to the proposed multitude of projects surrounding the revitalization and restoration of the Los Angeles River. Specifically – in regards to the Rio de Los Angeles State Park, G2 Parcel, and Bowtie Parcel – I am concerned there has not been sufficient coordination between the relevant agencies of the 100 Acre Partnership (California State Parks, Mountains Recreation and Conservation Authority, and City of Los Angeles) which are leading the efforts at the creation of this contiguous open space.

As proposed, the G2 Parcel would be accessed from the road leading toward the Metrolink Maintenance Facility to the south of the Rio de Los Angeles State Park. For an individual recreating in the State Park it would require walking outside of the State Park completely, at an approximate distance of .6 miles. This condition is despite the fact that the G2 Parcel is separated from the State Park only by the rail right-of-way; approximately 60 feet. This proposal creates an impediment, in perpetuity, to the comfortable and efficient interoperability of this significant open space investment.

One way to mitigate the disconnection between the Rio de Los Angeles State Park and the G2 + Bowtie Parcels, would be to create a pedestrian and wildlife bridge over the train tracks, commonly known as a *wildlife crossing*. I strongly urge the California High Speed Rail Authority to collaborate with the 100 Acre Partnership organizations so that these two massive once-in-a-lifetime projects can exist in harmony and not in spite of each other.

With regards,

Michael Tessler
Cypress Park Resident
Principal, Responsive Homes

3756 W. Avenue 40 Suite K510, Los Angeles CA 90065 · (818) 406-1224
michael@responsivehomes.com · responsivehomes.com

Response to Submission 872 (Michael Tessler, Responsive Homes, August 31, 2020)

872-1590

The commenter expresses concern regarding proposed projects related to the revitalization of the Los Angeles River, including Rio de Los Angeles State Park, the G2 Parcel, and the Bowtie Parcel, and coordination among relevant planning agencies for these resources. The commenter expresses concern related specifically to connectivity between these resources for pedestrians, bicyclists, and wildlife. Connectivity between Rio de Los Angeles State Park and the Proposed Taylor Yard G2 River Park is identified within the LARRMP. Section 3.15.3 of this Final EIR/EIS has been revised to state: "The HSR Build Alternative would not result in a loss of parkland but may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreational experience as identified in the LARRMP under objectives related to the Taylor Yard Opportunity Area." In addition, through implementation of PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would provide alternative routes for the acquisition of existing or planned bicycle routes. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity. Therefore, the HSR Build Alternative is consistent overall with the applicable local plans, goals, and policies, which include connectivity of these parks and recreational resources with neighboring communities.

Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020)

June 23, 2020

Ms. Diane Ricard
Project Manager
California High-Speed Rail Authority
355 S Grand Avenue, Suite 2050
Los Angeles California 90071

RE: Comments on the California High Speed Rail Burbank to Los Angeles Draft Environmental Impact Statement/Draft Environmental Impact Report

Dear Ms. Ricard:

This letter is written as comments with respect to the subject EIS/EIR currently circulating for public comment. In general we find the draft in some respects lacks clarity and transparency with regard to the acquisition requirements for the project as well as the impacts to the Lincoln Heights residential and business community resulting from the Main Street grade separation.

- Displacement: This term is defined as property acquisition of a parcel or structure.(3.12.1.1) However Appendix 3.1-A, page 15 is labeled "Properties Affected by the Project Footprint ". The term Displacement is not used anywhere in the exhibit such that the reader is not informed that the meaning of "permanently affected" is actually permanent acquisition. Similarly the term "construction easement" does not provide any information with respect to the length of the easement period, the extent to which improvements will be demolished or the parcel otherwise impacted,etc. Appendix 3.12-D provides more detailed images of the acquisitions however the designations appear inconsistent with those in 3.1-A, particularly with regard to sheets 48, and 50.(Other sheets were not reviewed). Additionally, 3.12-D shows construction easement designations for entire parcels rather than the portion that will be subject to the easement such that it is impossible for the reader/property owner to ascertain the extent of the damages to the property. **The Summary should clearly describe the properties or portions of properties targeted for acquisition, including moving a corrected Appendix 3.1-A into the Summary once 3.1-A and 3.12-D are reconciled. Other maps in the EIS/EIR that reference the affected parcels should also be corrected as described above.**

692-729

- Errors in Appendix 3.1-A: Based on conversations with CHSR staff we understand a number of parcels identified on this appendix are color coded in error. In some cases parcels identified as permanently affected (to be acquired) are in fact subject to a construction easement (limited acquisition) and the reverse is also true. Some parcels are identified as needed for track work when in fact they are needed for street improvements. A required road easement along Gibbons Street is shown as needed for "systems" and is shown as going through several improved properties when actually it will be totally within an existing access road in the right of way. Parcel 5409-003-018 is shown as a roadway acquisition but will be used as replacement parking for the Coty of Los Angeles Department of Water and Power. Parcels 5409-003-036 and 37 are "affected" and will be acquired because they lose their Main Street access but the adjacent parcel 5409-003-38 is owned by the same party as parcels 36 and 37 and could provide access to Naud Street. Parcels 36 and 37 will suffer a substantial diminution in value as a result of losing Main Street access but need not be landlocked. **This exhibit should be carefully reviewed, reconciled with 3.12-D and corrected, re-labeled to state that its purpose is to clearly identify properties that are scheduled for acquisition and revised copies sent to all owners and tenants affected, with clear explanation as to acquisitions, duration and purpose and extent of the construction easements, etc. The comment period and public hearing schedule should be extended to allow owners additional time to consider such changes.**

692-730

692-731

- Other Affected Properties: Certain other properties beyond those planned for CHSR acquisition will be "affected" by the construction of the Main Street overpass. These include all properties south of Main Street between the Los Angeles River and Moulton Avenue, which will be severely impacted by limited access during the construction period when Main Street is closed and during the operation period when access is indirect and circuitous. **These impacts, including a reduction of sales and property taxes during the construction period and into operations should be reflected in the sales and property tax projection sections of the EIR/EIS.**

692-732

- Changes in Visual Quality: The Socio-Economics section 2.12 includes a discussion of the changes in visual quality resulting from the construction of the Main Street overcrossing. It concludes that the impact will be "neutral" because it will a) be designed to reduce intrusiveness to the viewer, b) viewer sensitivity is low, and the structure would not be out of character to the area. No conceptual design images are shown for this structure (that is over one and a half times the height of the other grade separations that are characterized as being out of scale to their communities), to show it will be designed to lessen its impact. This structure will be one of the largest in the

Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-732

area and is adjacent to a park and a residential area. No explanation is given for the conclusion that the overcrossing would not be out of character. Absent any design or explanation its impossible to conclude it will not create a change to the visual quality of the area. **Conceptual drawings supporting the conclusions of no impact, including view perspectives from the park and residential uses should be included. The comment period and public hearing should be further extended for 30 days beginning after this information is made available to the public.**

692-733

692-734

- Noise Impacts: We were unable to see where potential noise impacts from traffic utilizing the proposed overcrossing were analyzed. The noise impacts section states as follows: "As presented above in Section 3.4.4.1, FHWA and Caltrans noise regulations only apply at locations with a significant change in the horizontal or vertical alignment or location of an existing highway or roadway, or where traffic volumes are anticipated to increase by a substantial amount (a doubling of volume) under the HSR Build Alternative. There were no locations in the project corridor near noise-sensitive locations where either of these conditions were met; therefore, no detailed analyses associated with roadway improvements are necessary." The proposed overcrossing will be approximately 40 feet above the elevation of the existing roadway which represents a significant change to its existing vertical alignment. Noise impacts resulting from the new roadway configuration to churches, schools and residents should be analyzed.

692-735

- Additional Community Impacts: The acquisition of right of way parcels on the north side of Main Street between the Los Angeles River and Clover Street will result in a number of remnant parcels along Albion Street, Darwin Avenue, Avenues 16 and 17 and Main Street. Additionally, the properties on the south side of Main between Lamar and the east side rail tracks will be impacted by the construction of the newly configured Lamar Street and the overcrossing. **An additional Mitigation Measure should be included that requires CHSR to develop and implement a disposition and improvement strategy, for review and approval by the City of Los Angeles, that details what strategy will be used to either dispose of the properties to private owners and/or develop the parcels as improved public rights of way or landscaped areas. The plan shall be completed for City of Los Angeles approval prior to acquisition commencing for any properties east of the Los Angeles River. The cost of developing the plan, disposing of parcels and improving and maintaining properties that remain in public ownership shall be a Project cost.**

692-736

- Main Street Bridge Mitigations: Mitigation for the impacts to the historic Main Street bridge are limited to survey/documentation work and the preparation of a "study" to look at reuse options for the bridge including as a bicycle and pedestrian crossing. However the EIR/EIS state that the high speed rail tracks bisecting the bridge will be behind parallel security fencing. Even if gates are used for pedestrians instead of fencing, the projected high volume of trains will make it impractical for the historic bridge to be used as an alternative to the new overcrossing. Elsewhere in the EIR/EIS it states that the City will be responsible for the maintenance and security of the abandoned bridge. This burden should be undertaken by the CHSR. **An additional mitigation should be added such that if the study undertaken for a reuse of bridge fails to identify a reuse acceptable to the City of Los Angeles, CHSR (or such other public agency that undertakes the Main Street overcrossing project) will enter into a perpetual access, maintenance and security agreement (or similar agreement) with the City for maintenance and security of the historic bridge such that it does not deteriorate and become an attractive nuisance and burden to the Lincoln Heights community.**

692-737

We are greatly concerned that the Authority, as evidenced in this document, has failed to provide the community with critical information necessary to evaluate the impacts as described above. Additionally, the document seeks to economize in the implementation of the Main Street overcrossing without ample regard for the impacts to businesses and residents of western Lincoln Heights, and the damage to the built environment it will leave in its wake.

692-738

We request that the Authority delay the public hearing and extend the comment period deadline further until the critical corrections and additions described above are made available to the public and a meaningful, robust and personal outreach program and dialogue be conducted with the community.

692-739

Sincerely,

Steve Riboli
owner
San Antonio Winery, Inc
City of Los Angeles
Cultural Historical Landmark #42

Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

Date: June 23, 2020

Ms. Diane Ricard
Project Manager
California High-Speed Rail Authority
355 S. Grand Avenue, Suite 2050
Los Angeles, CA 90071

RE: California High Speed Rail Authority's Burbank to Los Angeles Project Section, Draft EIR/EIS, i.e., the Main Street Overpass (Lincoln Heights)

Dear Ms. Ricard:

Enclosed are comments from Gibson Traffic Consultation Company, Inc. and San Antonio Winery, Inc. from their analysis of the Burbank to Los Angeles Draft EIR/EIS, specifically, the proposed Main Street Overpass in Lincoln Heights. Reports were generated for clarity on the impact of the proposed Main Street overpass construction to the daily lives of residents and businesses of Lincoln Heights and the Greater East Los Angeles Area. The need for transparency at this preliminary juncture cannot be overstated. The public is entitled to be fully informed of the disruptive nature of this project to the area where they live and work. To that end, and considering COVID-19 constraints, it is imperative that the State afford additional time for the public to be heard.

In addition to the stated reports, the following are certain critical concerns raised from a community perspective:

- **Street Detours or Closures on Main Street and Surrounding Streets**
The proposed Structure of the Main Street Overpass over established rail lines and the LA River will have detrimental consequences for businesses and residential neighborhoods in Western Lincoln Heights. Specifically, businesses along Main Street, Clover St, Lamar Street, Gibbon St, and Moulton Ave, will be severely impacted by road closures, construction activity and reconfigured streets. Main Street, a principle corridor in and out of Downtown Los Angeles will be reduced to one lane each way increasing traffic to an already overburdened and congested commute.
- **High Levels of Criteria "Toxic" Pollutants**
Unhealthy air quality will impact residences, schools, businesses, parks, and community facilities from construction and related equipment. Lincoln Heights residents living on Avenues 17,18,19 and 20 whose children attend Albion Elementary School will be physically and mentally effected not only by the project's inherent toxicity but by constant construction noise diesel exhaust. These individuals will suffer long-term health consequences of these pollutants which will compound respiratory air-born illnesses such as COVID-19.

Letter to Ms. Diane Ricard
Cal. High-Speed Rail Authority

As part of HSR's Environmental Justice policies, guidelines and findings, this scenario was not documented in the Draft EIR/EIS. There is no indication that Albion Elementary School officials or parents where ever contact as part of the EJ outreach program.

- **Closure of Albion Riverside Park - Construction Equipment and Detours**
It is likely that Albion Riverside Park land will be utilized for parking construction equipment or have no access points due to construction detours. As proposed, Lamar and Gibson Streets will be re-configured to "run under" the proposed Main Street overpass and connect with Albion Street on the north side. Commercial and private vehicles south of Main Street will have a new "exit" route on Albion Street to access the I-5 frwy via Broadway, limiting access.

- **Noise and Vibration Health Impacts**
The construction noise of bulldozing, demolition, blasting, drilling, during work hours (7am-5pm), that may even include nighttime construction, will create significant long-term effects from noise exposure including hearing loss, sleep disturbances, decreased school performance, increased stress and modification of social-behavior.

Additional noise, vehicle congestion and exhaust will plague this residential community which already suffers from poor air quality. Again, you ask a local minority, working-class community to shoulder the burden of the negative impacts of a statewide transportation project, whose residents will likely never use High Speed Rail for work or travel.

In compliance with the Governor's **Executive Order N-33-20** to "Stay at Home," we ask your flexibility in designating an additional thirty days beyond the current July 31, 2020 public comment deadline. Additional time will provide for more robust public engagement considering the serious consequences to this community of low-income minorities and seniors. Without the technology or experience to participate in virtual forums, they are severely disadvantaged when normal channels of public access are closed. Accordingly, as California and Los Angeles County remain affected by the pandemic, the process must be adjusted fairly for the State to meet it obligation of aggressive outreach efforts to the surrounding impacted neighborhoods of the proposed Main Street overpass. We look forward to, and anticipate a favorable response.

Sincerely,



Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued



June 26, 2020

Diane Ricard
Project Manager
California High-Speed Rail Authority
355 S. Grand Avenue, Suite 2050
Los Angeles, CA 90071

Re: REVIEW OF THE MAIN STREET OVERPASS ANALYSIS AND THE HSR DRAFT EIR/EIS TRANSPORTATION SECTION **Ref: J1835**

Dear Ms. Ricard:

Gibson Transportation Consulting, Inc. (GTC) was asked to review two documents pertaining to the effects of the California High-Speed Rail (HSR) Project on the area around the San Antonio Winery near the proposed Main Street Overpass in Los Angeles, California. The documents reviewed were: *Analysis of HSR Potential Main Street/Los Angeles River At-Grade Crossing* (KOA Corporation, August 9, 2019) (KOA Memorandum) and *Burbank to Los Angeles Project Section Draft Environmental Impact Report / Environmental Impact Statement, Section 3.2 Transportation* (California High-Speed Rail Authority, May 2020) (Draft EIR/EIS).

The following should be considered comments on the Draft EIR/EIS.

ANALYSIS OF MAIN STREET OVERPASS

The KOA Memorandum analyzed the effects of the HSR Project on the existing at-grade rail crossings on Main Street on both sides of the Los Angeles River (L.A. River). Currently, the train volumes are heavier on the West Bank of the L.A. River, but that situation will change when HSR service begins. The Metrolink and Amtrak trains will shift to the East Bank, with HSR trains on the West Bank. Under this operation, the crossings will be more balanced.

The analysis predicted the growth in the train crossings, with the current level of 126 trains/day increasing to 378 trains/day by Year 2040 with HSR service. This activity level could increase to 625 trains/day with the Southern California Optimized Rail Expansion (SCORE) program proposed by Metrolink.

The analysis indicated that the amount of time that the rail gates are down, the total vehicle-hours of delay, and the maximum traffic queues will all double over their current levels over the next 20 years. As detailed in the KOA Memorandum, for prolonged periods of the daylight hours in Year 2040, the crossing gates at the Main Street crossings could be in the down position for almost 50 minutes of each hour. Clearly this would result in major traffic dysfunction and severe impact on emergency vehicle access and trucking service access in the area. The analysis concluded that the location needed a full grade separation (Main Street

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692-750

Overpass) in order to provide safe operations for the train service and acceptable vehicular, pedestrian, transit, emergency vehicle, and pedestrian access for the area.

692-751

If the projected train activity levels actually materialize and the grade separation is needed, we have some operational concerns with the current conceptual design, shown in Figure 1. For the purposes of our analysis, GTC divided the area into four quadrants separated by the L.A. River and Main Street.

Northeast Quadrant Impacts

692-752

The draft concept¹, illustrated in Figure 1, shows two large triangular-shaped areas consisting of multiple parcels and deemed as having "potential effects" from the HSR Project. Most of the businesses in these two triangles appear to take their primary access from Main Street and, therefore, it is very likely that these parcels will need to be completely acquired and demolished rather than "potentially effected".

692-753

The proposed Main Street Overpass design connects Lamar Street and Gibbons Street to Albion Street via a new underpass under the Main Street Overpass. Albion Street passes by a new park and then connects to the residential neighborhood served by Avenues 18, 19, and 20. This could become a cut-through route for industrial traffic headed for the Interstate 5 (I-5) ramps at Broadway. This potential residential impact is not discussed in either the Transportation Section or in the Community Impacts Section of the Draft EIR/EIS.

692-754

The acquisition of these parcels (and the parcels in the other three quadrants) will leave small remainder parcels after the construction of the Main Street Overpass. The Draft EIR/EIS should include a description of the disposition program that will accompany the right-of-way purchase plan, so that the community may understand the plans for the land after the construction of the Main Street Overpass.

Southeast Quadrant Impacts

692-755

The Lamar Street rerouting onto Main Street will affect the parcels on the southwest corner of Main Street & Lamar Street. The increased street corner radius needed to transition Lamar onto the Main Street alignment will require the commercial parking lot on the corner to be modified to the point that it may not be able to support the existing commercial development on that parcel.

The primary access for the industrial uses located south of Main Street and east of the L.A. River would be re-routed from Lamar Street to access Main Street via Clover Street, one block to the east. A new east-west street would be constructed between Lamar Street and Clover Street to provide the area with access to Clover Street.

The industrial area south of Main Street includes a number of large businesses such as:

¹ Grade Separation – Main Street Overpass, Impact Plan Sheet CV-T1153 and 1154, CHSR, STV/Jacobs, April 30, 2019

692-750

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- San Antonio Winery, an active winery with a restaurant and winery tours that attract hundreds of thousands of visitors per year
- CEMEX – Los Angeles concrete batch plant that generates hundreds of truck trips per day
- A major United Parcel Service distribution and customer center generating both customer vehicular trips and large truck trips in and out of the facility
- The Union Pacific and Southern Pacific rail yards, generating both truck and employee trips

692-756

These land uses generate a substantial number of trucks per day and, thus, special considerations will need to be included in the design for the eastern end of the overpass. We recommend the following improvements, illustrated in Figures 2A-2C, be added as mitigation measures to the Main Street Overpass proposal:

1. Large turning radii on the corners of the Clover Street & Main Street intersection, as well as on all corners of both ends of the new east-west street.
2. Parking prohibitions on one side of Clover Street, south of Main Street, to provide adequate lane widths to accommodate the increase in truck trips and to provide two northbound approach lanes to Main Street.
3. A traffic signal at the intersection of Clover Street & Main Street in order for trucks to move safely in and out of the industrial area.
4. Given the number of visitors to/from the San Antonio Winery each year, the replacement of the existing directional signing at Lamar Street & Main Street that will instead route customers between the San Antonio Winery and the intersection of Clover Street & Main Street.
5. A Neighborhood Traffic Management Plan (NTMP) for the residential neighborhood north of Main Street to deal with the increased number of trucks that will use the new Lamar, Gibbons and Albion Streets underpass under the Main Street Overpass to reach the I-5 ramps to/from the north.

In addition, the Main Street Overpass project should begin with the construction of the new street between Lamar Street and Clover Street and the signalization of the Clover & Main intersection. This would allow traffic to/from the Southeast Quadrant to reach Main Street and head toward I-5 without traversing the adjacent neighborhoods. With these changes, the overpass will function more safely and the area south of Main Street will have its access to the freeway maintained.

Northwest Quadrant and Southwest Quadrant Impacts

Main Street access to the industrial and commercial parcels north and south of Main Street west of the L.A. River will be cut off between the L.A. River and Sotello Street as the overpass traverses between its high point over the L.A. River and touches ground level at Sotello Street. Along the north side of Main Street, the current driveway access for 1717 Main Street, access from Wilhardt

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Street, and the driveway located at the extension of Mesnagers Street will be closed. Along the south side, Gates 1 and 2 to the Department of Public Works Main Street Center will be closed, forcing the entire complex to use LeRoy Street to access Main Street. All access to the parking lots along the east side of the HSR tracks will be lost and the parking will have to be replaced by a parking structure at the southwest corner of Main Street & Wilhardt Street.

It is not clear that acceptable, workable circulation plans for these parcels have been proposed and circulation plans should be added to the Project mitigation program.

COMMENTS ON THE DRAFT EIR/EIS

Transportation Chapter 3.2

692-758

GTC reviewed the Draft EIR/EIS Transportation Chapter and has the following comments:

Pg. 13 Table 3.2-3 lists the criteria for selecting a segment or an intersection for detailed study. These criteria do not appear to have been applied consistently.

692-759

Pg. 20 The locations of the study intersections do not include the intersection of Main Street & Clover Street even though a traffic signal will be needed as a direct result of the Project, given the amount of traffic that will be re-routed to this location.

692-760

Pg. 31 The analysis states that a freeway on- or off-ramp was evaluated for queuing impacts only if the HSR Project added more than 100 trips per hour to an individual ramp, which is a much lower standard than the City of Los Angeles (City) requirement for ramp queuing analyses. As the City requires a ramp queuing analysis if a project adds 25 or more trips to a ramp, 100 trips is a very low standard for impact.

692-761

The Draft EIR/EIS did not disclose the number or location of the ramps where the HSR Project added 100 trips as a result of the Project.

Pg. 32 The thresholds for significant impacts are:

Segments	LOS E or F with a V/C increase of 0.04 or more
Signalized Intersections	LOS E or F with a delay increase of four seconds or more
Unsignalized Intersections	LOS E or F with a delay increase of five seconds or more and signal warrants met

These warrants are much more lenient than the City criteria and, therefore, the number and locations of significant impacts are dramatically reduced compared to what would be identified under City criteria. Locations that the City would consider to be significantly impacted were not analyzed under the threshold criteria described above, resulting in the Draft EIR/EIS dramatically underestimating and underreporting Project impacts.

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692-762

Pg. 37 The report lists the following street segment capacities:

two-lane road	26,400 to 30,000 vehicles per day (vpd)
four-lane road	65,400 to 72,000 vpd
five-lane road	93,600 vpd
six-lane road	118,200 vpd

These segment capacities are higher than we have ever seen used in an EIR. We do not believe that they can be justified in the Study Area given the number and spacing of traffic signals located along the roads in question. These assumptions tend to dramatically reduce the number of potential project impacts, as is evidenced in the analysis portions of the report. As with the intersection impacts listed on Page 32, segments that the City would consider to be significantly impacted were not analyzed based on the threshold criteria described above. These capacity numbers should be justified or changed to values more in line with industry standards.

692-763

Pg. 39 Table 3.2-10 indicates that Main Street on both sides of the L.A. River operates at level of service (LOS) A during both the morning and afternoon peak hours with volumes over 1,700 vehicles per lane per hour along a roadway that has at-grade rail crossings and traffic signals. These traffic volumes and conditions do not represent LOS A operational conditions. Using these atypical daily and hourly capacity assumptions in the analyses clearly understate the actual impacts and, therefore, the document does not give the decisionmakers realistic information upon which to make a decision.

692-764

Pg. 41 Capacity calculation results are generally summarized in the Draft EIR/EIS, but the reader is referred to another document for the details of the calculations. The reader should not be referred to a completely separate document. As described in the summary, the capacity calculation results are found two tables in the reference document and these tables should have been included in the Draft EIR/EIS.

The analysis concludes that there are no current morning or afternoon peak hour queuing issues on any of the 16 downtown study area off-ramps. This statement is not consistent with California Department of Transportation findings in its review of many other downtown development project proposals.

692-765

Pg. 45 It is unclear whether the analysis includes the effects of the Los Angeles Union Station Forecourt Project, which will add bicycle lanes and reduce vehicular travel lanes along Alameda Street in front of Union Station. If the Forecourt Project was included in the analysis, it should be stated. If it was not included, the capacity calculations around Union Station should be re-done.

692-766

Pg. 53 The impacts of construction are measured against Year 2015 conditions. Since the construction is not likely to take place until Year 2022-2025, the Base Condition should be updated to a more appropriate year closer to the actual construction time.

692-767

Pg. 54 Table 3.2-16 lists LOS results for impacted study intersections during construction. Adding the intersection numbering system to the intersection tables throughout the report would be helpful to the reader. Adding the "after" LOS calculations and delay results to the table would show that the impacts have been mitigated.

692-768

Pgs. 63-64 The illustrated detour routes for the Main Street overpass are not detailed nor does Chapter 3.2 include a discussion of the amount of time that Main Street would be closed. The businesses in the area are entitled to a Draft EIR/EIS that better describes the impacts to their properties of the overpass construction.

692-769

Pg. 77 Table 3.2-32 lists six unsignalized intersections that will be signalized as part of the mitigation measure program. The intersection of Main Street & Clover Street will also require signalization as a direct result of the construction of the Main Street Overpass and the resulting re-routing of local traffic to this location. This intersection should be added to this mitigation table.

692-770

Pgs. 77-78 Tables 3.2-33 and 3.2-34 suggest that only eight street segments along the entire route would experience a significant impact from the HSR Project. The number of impacted segments would be substantially higher had realistic street capacities been used in the analysis.

692-771

Pg. 78 The EIR/EIS concludes that no roadway segment anywhere in Downtown Los Angeles would operate at LOS E or F in Year 2040. Observations of the actual peak operating conditions along downtown streets indicate that several segments are operating at LOS E or F under today's conditions. The use of more appropriate street capacity assumptions in the analyses would not have resulted in this LOS E or F conclusion.

692-772

Pg. 95 This signalization of Main Street & Clover Street is missing from the list in Table 3.2-36

Community Impacts Section

692-773

The Draft EIR/EIS contains no discussion of the potential cut-through traffic impacts on the neighborhood north of Main Street along S. Avenues 18, 19, and 20. The connection of Lamar and Gibbons Streets to Albion Street under the Main Street Overpass will encourage truck and vehicular traffic to traverse this neighborhood to reach the I-5 Broadway ramps to/from the north.

692-774

City of Los Angeles CEQA practice would require that the mitigation program for the Project include at least the commitment to produce an NTMP as part of the Main Street Overpass project.

692-775

Visual and noise impacts of the HSR Project and the Main Street Overpass on Albion Park and the residential neighborhood should be better analyzed and explained.

692-776

The elimination of the existing at-grade railroad crossings and the construction of the Main Street Overpass is likely to result in the Main Street corridor becoming more attractive to traffic between I-5 and Downtown Los Angeles. Yet no traffic increases along the corridor are discussed in the Draft EIR/EIS. There are two elementary schools in close proximity to Main Street between the

Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

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692-776

Main Street Overpass and I-5 and the Project effects on these schools should have been discussed.

692-777

Likewise, if additional traffic is attracted to the Main Street corridor, it is likely that the intersection of Main Street & S. Avenue 21 will need to be signalized to maximize the effectiveness of the southbound I-5 off-ramp at S. Avenue 21, thus reducing the amount of neighborhood cut-through traffic along S. Avenues 18, 19, and 20.

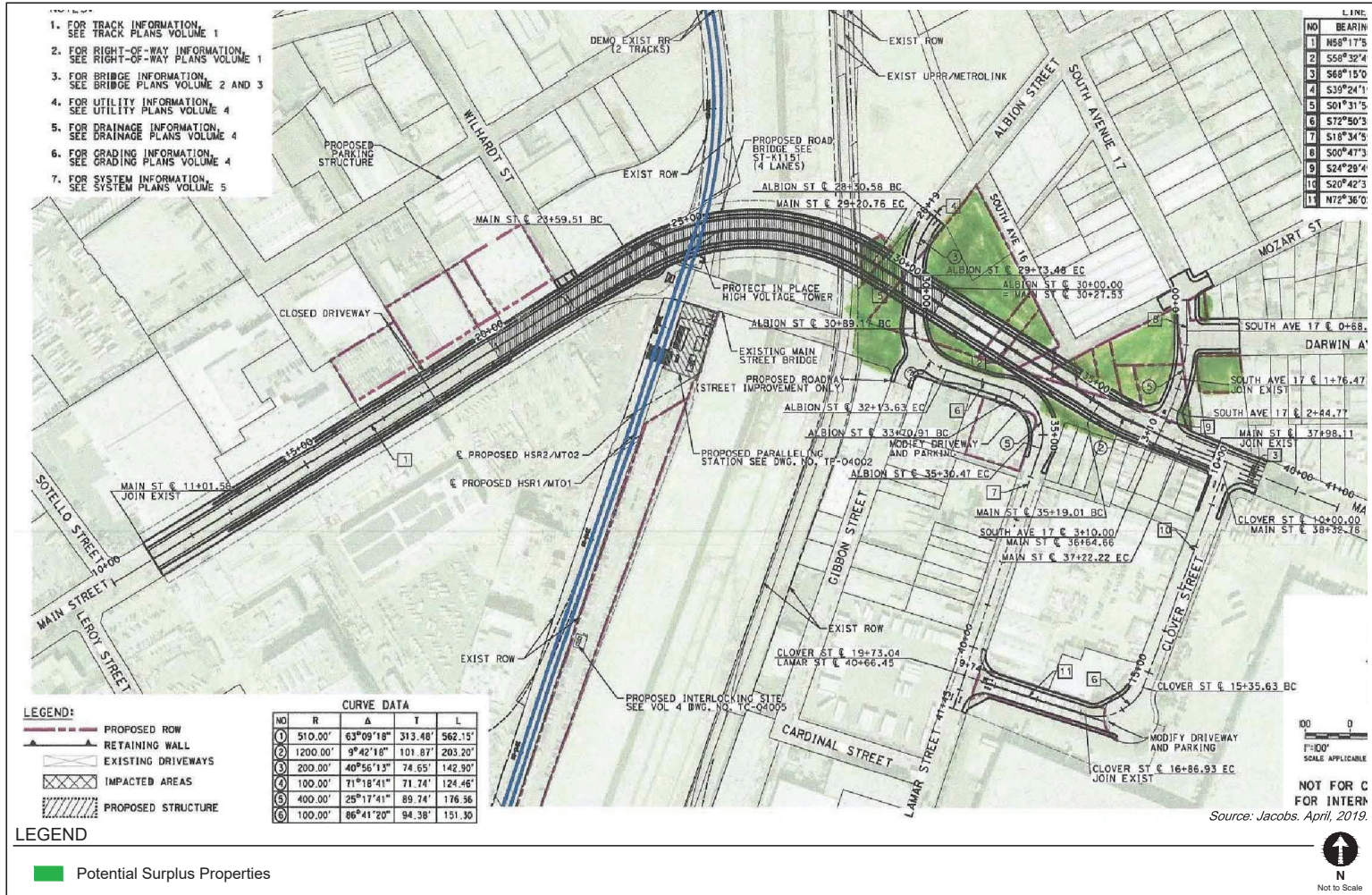
Thank you for the opportunity to review the Draft EIR/EIS. We look forward to the responses to these comments.

Sincerely,



Patrick A. Gibson, P.E., PTOE
President

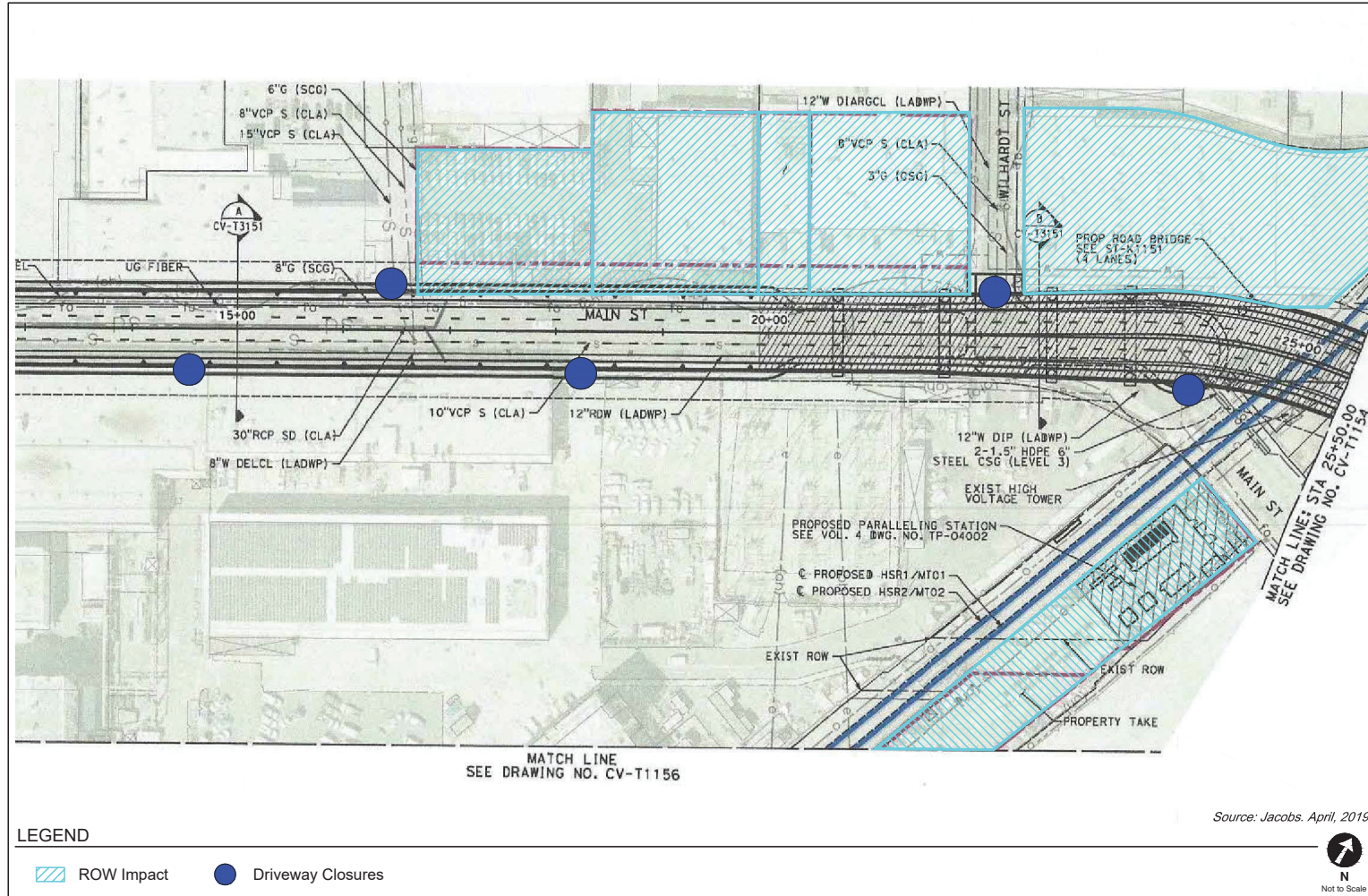
Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued



MAIN STREET OVERPASS CONCEPT

FIGURE 1

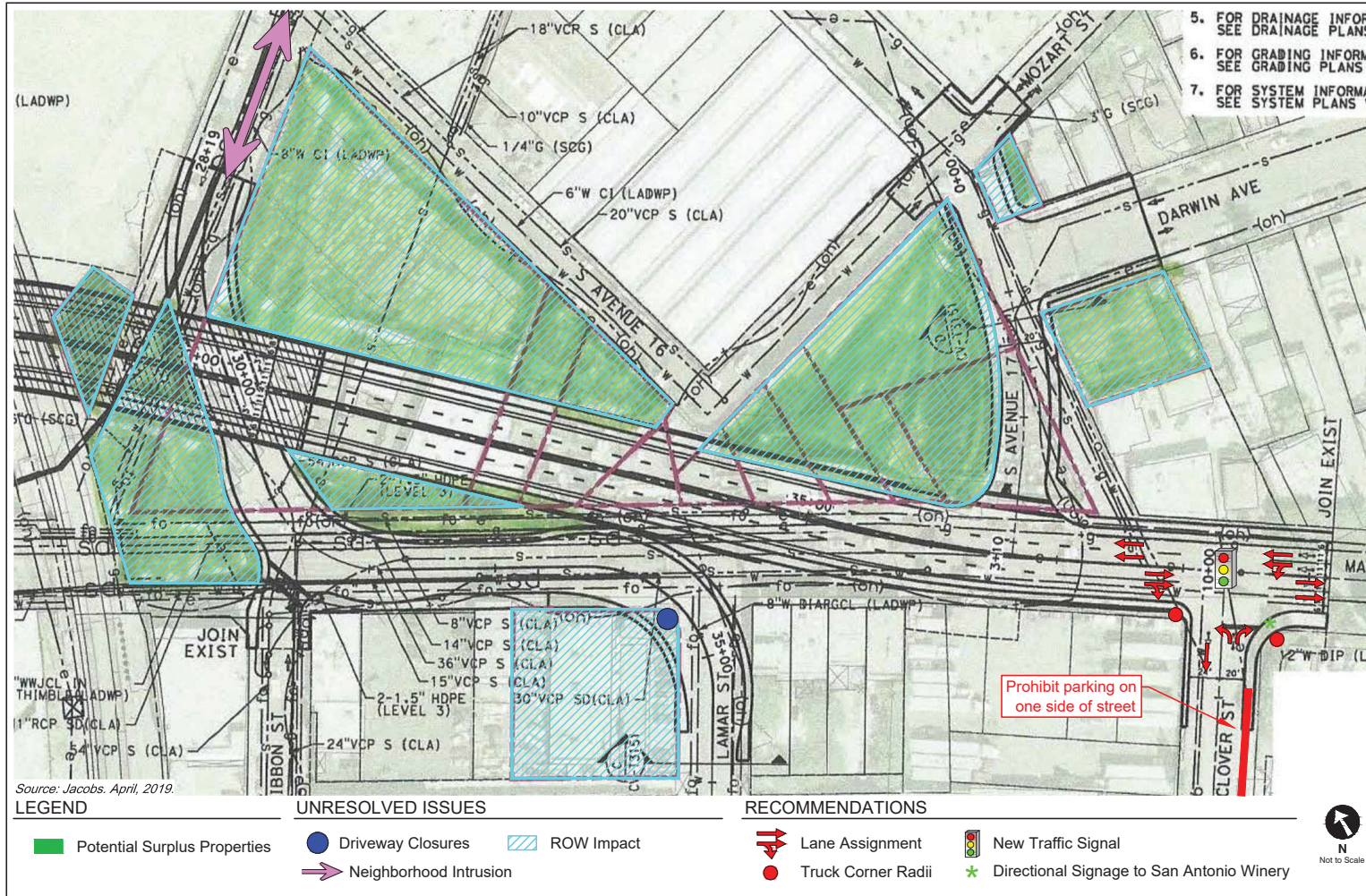
Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued



MAIN STREET OVERPASS
WEST SECTION

FIGURE
2A

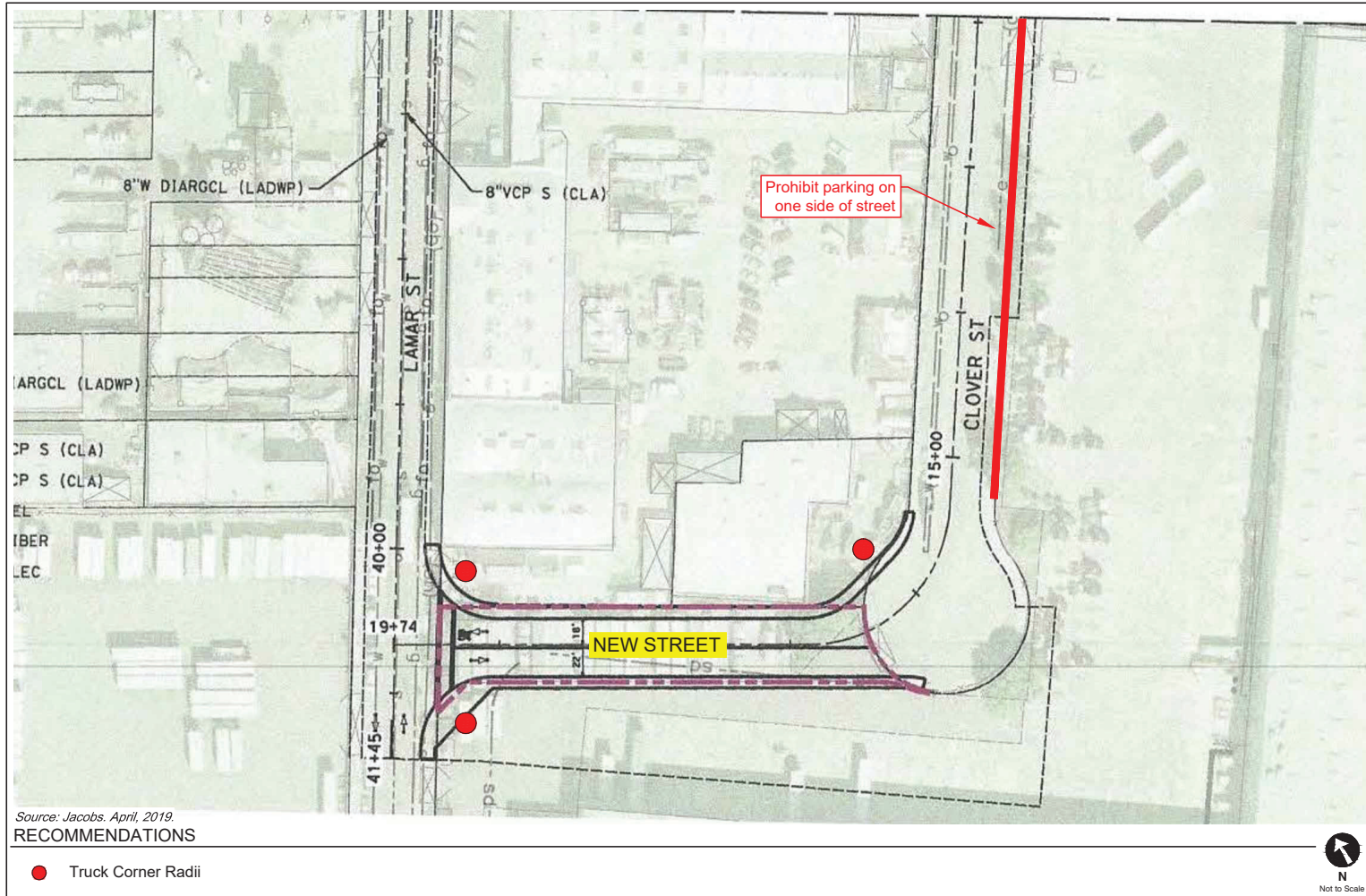
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MAIN STREET OVERPASS
EAST SECTION

FIGURE
2B

Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued



MAIN STREET OVERPASS
CLOVER STREET CONNECTION

FIGURE
2C

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020)

692-727

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

The commenter expresses general concerns related to real property acquisition and impacts to the Lincoln Heights community from the Main Street grade separation, which are identified with specificity in the bullets that follow. Refer to Responses to Comments 692-728 through 692-739. Additionally, refer to Appendix 3.12-D, Property Acquisitions and Easements, of this Final EIR/EIS for an updated detailed map showing expected property acquisitions and easements required. Additionally, refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

692-728

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

The commenter states that the term “displacement” is not used anywhere in Appendix 3.1-A such that the reader is not informed that the meaning of “permanently affected” is a permanent acquisition.

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

Appendix 3.1-A, show areas occupied by HSR infrastructure or permanent changes to roadways or freight tracks. Appendix 3.1-A does not show property acquisitions. For the purposes of reviewing potential property acquisitions (full and partial acquisitions as well as temporary easements) refer to Appendix 3.12-D, Potential Property Acquisitions and Easements.

The commenter also states that “construction easement” does not provide information with respect to the length of the easement period, the extent to which property improvements would be demolished, or how the parcel would be otherwise impacted, etc. The EIR/EIS is based on a preliminary level of design provided in Volume III that is sufficient for fully disclosing environmental impacts. The precise scope of a construction easement on a particular parcel, and the anticipated duration of the easement, will be developed as the design progresses. While construction easement durations are not known at this time, Table 2-18, Construction Schedule, in this Final EIR/EIS provides a preliminary schedule of construction activity durations. Construction easements for a particular parcel may be required for the entire duration of the construction period or only a short time during construction. Construction easements never require the demolition of the primary structure on a property.

The commenter also states there are inconsistencies between Appendix 3.12-D and Appendix 3.1-A. However, these appendices present different parameters. Appendix 3.1-A, Parcels Affected by the Project Footprint, includes areas of permanent impact (e.g., areas occupied by HSR infrastructure or permanent changes to roadways or freight tracks), as well as areas of temporary impact (e.g., construction staging areas or construction easements), as described in Section 3.1.3.4, and Appendix 3.12-D shows

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-728

anticipated property acquisitions and easements. Unlike Appendix 3.12-D, Appendix 3.1-A is footprint-based. These footprint maps have a larger area of impact, and an effect on the footprint map does not correlate to an acquisition. For example, access to an area would not involve the footprint, per se, but would show the parcel as being temporarily acquired or having a temporary construction easement over the parcel. The parcel acquisition will be for the entire parcel, whereas the footprint will be to the limits of disturbance.

The commenter also states that Appendix 3.12-D shows construction easement designations for entire parcels rather than the portion that will be subject to the easement such that it is impossible for the reader/property owner to ascertain the extent of the damages to the property. As the commenter states, Appendix 3.12-D highlights all of the parcels where temporary construction easements (TCE) and/or partial acquisitions would be required rather than shading the smaller areas on those parcels that would be affected. Because Appendix 3.1-A is footprint-based and shows a larger area of impact, TCEs could be shown on Appendix 3.1-A. However, showing very small acquisition areas becomes difficult due to the scale at which the parcel acquisitions and easements are mapped in Appendix 3.12-D.

As described in Section 3.13.6, LU-IAMF#3 would ensure that construction and staging areas used temporarily during construction would be returned to a condition equal to their pre-construction condition. In addition, the Authority would negotiate with the property owner to lease the land required for the TCEs. Therefore, there would no permanent damages to property where TCEs are required.

The commenter also states that the Summary should clearly describe the properties or portions of properties targeted for acquisition. The Summary provides an overview of the EIR/EIS. That level of detail is not appropriate for the purposes of the Summary. However, more detailed information on property acquisitions, displacements, and resident and business relocations, as well as the availability and suitability of relocation resources within the resource study area (RSA), is provided in the Draft Relocation Impact Report (Authority 2020). This report is available from the Authority upon request.

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

692-728

692-729

The commenter states that some parcels in Appendix 3.1-A are color-coded in error. The commenter also states that some parcels are identified as needed for track work when they are needed for street improvement. The commenter is correct that some parcels were incorrectly categorized in Appendix 3.1-A of the Draft EIR/EIS. The Authority has correctly updated Appendix 3.1-A in this Final EIR/EIS.

Refer to Response to Comment 692-728, contained in this chapter. The figures in Appendix 3.1-A do not identify the proposed property acquisitions.

In Appendix 3.1-A, the easement along Gibbons Street is shown partially as permanent systems (interlocking site, radio site, and power facilities) and as permanent track (access road, freight rail relocation, and HSR tracks), which identifies footprint areas needed for systems and track components. Parcel 5409-003-018 is shown as a permanent roadway (underpass) and temporary roadway (construction easement), which identifies footprint areas needed for roadway improvements.

The commenter states that Appendix 3.1-A should be carefully reviewed and reconciled with Appendix 3.12-D, and relabeled to state that its purpose is to clearly identify properties that are scheduled for acquisition, and that revised copies sent to all owners and tenants affected. Appendix 3.1-A has been reviewed as requested. The purpose of Appendix 3.1-A is not to identify property acquisitions, but to show the project footprint. The revised Appendix 3.1-A is available for public review in this Final EIR/EIS and was therefore, not mailed to property owners as requested.

The commenter also states that the comment period and public hearing schedule should be extended to allow owners additional time to consider such changes. The comment period had been extended from the minimum 45-day public review period ending on July 16, 2020, to August 31, 2020, in consideration of stakeholder requests and the novel coronavirus pandemic. The public review period of the Draft EIR/EIS was 94 days.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-730

The commenter requests an extension of the public comment period and public hearing schedule to allow owners additional time to consider the changes requested in Appendix 3.1-A. Appendix 3.1-A has been updated and is included as part of this Final EIR/EIS. According to California Environmental Quality Act (CEQA) Guidelines Section 15088.5, recirculation of an EIR prior to certification is required when “significant new information” is added after the draft EIR is circulated for public review.

Pursuant to the Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) regulations in effect prior to September 14, 2020, “if a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion” (Code of Federal Regulations [C.F.R.] Title 40, Part 1502.9(a)). A supplemental EIS is required when “[t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts” (40 C.F.R. 1502.9(c)(1)(ii)).

Revisions to the EIR/EIS between the Draft EIR/EIS circulated for public review and this Final EIR/EIS clarify and amplify information provided in the Draft EIR/EIS and do not introduce significant new information under CEQA Guidelines Section 15088.5 or 40 C.F.R. 1502.9(c)(1)(ii), and do not meet the recirculation standard under NEPA. Recirculation of the Draft EIR/EIS is not required. In addition, the Authority has been, and will continue to coordinate with the City of Los Angeles and local stakeholders regarding the design of the Main Street grade separation.

692-731

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

The commenter states that properties south of Main Street between the Los Angeles River and Moulton Avenue that are not proposed to be acquired by the Authority would be affected by the construction of the Main Street overpass due to limited access during construction and during the operation period when access is indirect and circuitous.

As described in Section 3.12.6.3 of this Final EIR/EIS, access to some neighborhoods, businesses, and community facilities would temporarily be disrupted by road closures and detours during construction, including in the vicinity of the Main Street Grade Separation. Increased traffic may worsen travel times, and detours may require out-of-the-way travel to access destinations within the community. However, access to the neighborhoods, businesses, and community facilities would not be eliminated. If roadways require closure, alternate access would be identified and detours would be provided. The contractor would develop a Construction Traffic Plan consistent with TR-IAMF#2 in coordination with city staff to minimize impacts to traffic circulation. These temporary road closures and detours would be identified and community notices provided prior to closures for continued access to neighborhoods. Therefore, continued access would be provided to businesses south of Main Street between the Los Angeles River and Moulton Avenue. Refer to the discussion under Section 3.12.6.3, Impact SOCIO#1 for additional information on temporary disruptions of access.

Additionally, the grade separations would not result in disruptions in access during operation because grade separations would improve the circulation of local streets by eliminating wait times at crossings. The street configuration changes during operation would improve access and community circulation by eliminating the rail corridor as a barrier or impediment to travel.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-732

The commenter expressed disagreement with the conclusions in the Draft EIR/EIS regarding the visual impacts of the proposed Main Street Bridge, specifically with the conclusions that the visual impact will be neutral because it will a) be designed to reduce intrusiveness to the viewer, b) viewer sensitivity is low, and the structure would not be out of character to the area. As described in Section 3.16.6.3, a key viewpoint was provided to show the new Main Street Bridge visual impact. Figure 3.16-23, Key Viewpoint 20, shows the existing and simulated view from Albion Street looking south, which shows a perspective of the height of the new bridge in relation to the existing environment. The proposed new Main Street bridge would be 86 feet wide and 75 feet high at its highest point over the Los Angeles River, and would place three columns within the river channel. Main Street would begin its ascent just east of Sotello Street on the west side of the Los Angeles River; the new bridge would come down to grade at Clover Street on the east side of the Los Angeles River. Albion Street would be reconfigured. The existing Main Street bridge would not be modified.

The proposed new Main Street Bridge would be designed to reduce intrusiveness to primary viewer groups, as stated in the Draft EIR/EIS. AVQ-IAMF#1 (Aesthetic Options) requires that the California High-Speed Rail Authority (Authority) prioritize the design of high-speed rail (HSR) non-station structures consistent with the local context. This impact avoidance and minimization measure (IAMF) will be implemented throughout the design of the proposed project and ensures that the new structure will not create a visual quality change in the community.

692-733

The commenter requests an extension of the public comment period. Refer to response to comment 692-730 contained in this chapter of this Final EIR/EIS regarding the extension of the public comment period to August 31, 2020.

692-734

As the commenter notes, the proposed Main Street grade separation does change the vertical alignment by a maximum of 40 feet. However, this change occurs at a point that is approximately 900 feet from the nearest noise-sensitive receptor. At a distance of 500 feet from the nearest sensitive receptor to the proposed overpass improvements, the elevation change in the roadway is roughly 20 feet. At a distance of 300 feet from the nearest sensitive receptor to the proposed overpass improvement, the difference in roadway elevation is approximately 8 feet. While typically a distance of 300 feet is considered the maximum acceptable limit of study for roadway noise on local roadways, even with the change in elevation of 20 feet at 500 feet, intervening buildings would continue to shield a significant portion of traffic noise from Main Street. Therefore, no specified detailed analysis associated with the Main Street overpass modification was conducted. No changes have been made to the Final EIR/EIS in response to this comment.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-735

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-01: Relocations, ROW Process, Eminent Domain.

The commenter states that additional mitigation should be included that requires the Authority to develop and implement a property disposition and improvement strategy for review and approval by the City of Los Angeles. The commenter requests that the strategy identify disposal of properties and development of properties as public rights of way or landscaped areas and the plan be approved prior to the commencement of property acquisition. The commenter also states the costs to develop the plan, as well as disposing and improving properties, be a project cost.

As described in Section 3.13.6.3, Impact LU#2, following construction of the HSR Build Alternative, the Authority would evaluate whether all acquired land extending outside the area required for operation and maintenance of the HSR Build Alternative would be needed long term. If not, the Authority may declare the property excess so the land may be disposed. To do so, the Authority would need to follow procedures set forth in Public Utilities Code Section 185040, which regulates the sale or exchange of property owned by State agencies. The sale and redevelopment of any land declared excess (i.e., remnant parcels) would allow such land to revert to its previous existing use or developed with uses in accordance with applicable local government land use plans and regulations.

The permanent impacts associated with construction of the HSR Build Alternative related to altering existing and planned land uses would be less than significant under CEQA because the HSR Build Alternative would not cause a substantial change in land use patterns that would be incompatible with adjacent land uses. Therefore, mitigation is not required and the Authority does not plan to acquire and convert adjacent land.

The Authority uses memoranda of understanding and cooperative agreements to establish its working relationships with local government entities along the HSR alignment as it moves forward with project implementation. The task orders executed with local government agencies specify the terms and precise standards to relocate or protect in place existing impacted facilities or utilities, and provide the obligations on the parties for engineering design, construction, costs, invoicing procedures, and

692-735

coordination. These agreements also set forth the mutual expectations of the parties to the agreement as to the consultation and review role of the local government over the course of design development. Memoranda of understanding and cooperative agreements may be used for improving or landscaping unused portions of parcels that stay in Authority ownership.

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

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-736

The commenter proposes additional mitigation regarding the Main Street Bridge facility such that the Authority would undertake maintenance and security of the historic bridge so it does not deteriorate and become an attractive nuisance. This proposed mitigation is directed to a cultural resources impact (Impact CUL#3) that the Draft EIR/EIS identifies as significant and unavoidable under CEQA. However, the existing Mitigation Measure CUL-MM#13 is sufficiently similar in effectiveness to what is proposed by the commenter so as to address this concern. As described in Section 3.17.8, CUL-MM#13 would require that the Authority facilitate the development of a feasibility study to explore design options that would maintain the historic use of the Main Street Bridge to the maximum extent feasible while still meeting safety requirements. This mitigation measure requires close coordination between the Authority and the City of Los Angeles to prepare the feasibility study. However, as the owner of the Main Street Bridge, the City of Los Angeles would be responsible for the ongoing maintenance of the historic bridge.

The features or conditions on the property of the Main Street Bridge that are likely to attract attention (and thereby may become an attractive nuisance) are similar to its character-defining features. Those character-defining features are described in Section 3.17.6.2 as the bridge's "relationship with the Los Angeles River, its reinforced concrete construction, open spandrels, multiple spans, and Beaux Arts design details." The HSR project would not physically encroach on the Main Street Bridge boundaries, nor would it require any construction activities that would cause physical destruction of or damage to this historic property. The character-defining features would be maintained, and the bridge would remain a pioneering example of the three-hinge bridge design in the western U.S. Because the bridge would remain in its historical location, it would continue to be an asset to the Lincoln Heights community as a representation of the City of Los Angeles' engineering history. Therefore, the HSR project would not deteriorate the character-defining features of the Main Street Bridge in a way that would create an attractive nuisance.

Further, as indicated in the Findings of Effect document (Authority, 2019; available upon request), more specific mitigation will be included in the Built Environment Treatment Plan (BETP) that will be prepared in support of the memorandum of agreement (MOA) between the Authority and the State Historic Preservation Officer. Therefore, no revisions to this Final EIR/EIS have been made in response to this comment.

692-736

692-737

The commenter expresses concern that the Authority failed to provide the community with critical information necessary to evaluate the project impacts. Refer to Responses to Comments 692-728 through 692-736 contained in this chapter of this Final EIR/EIS for detailed responses regarding the specific concerns noted in these comments.

692-738

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

The commenter states that the Main Street overcrossing design does not appear to take into account the potential impacts to businesses and residents of western Lincoln Heights.

In response to public comments on the Draft EIR/EIS, design changes were made to the Main Street Grade Separation to further reduce impacts to the community to the extent feasible.

As described under Section 3.12.6.3 of this Final EIR/EIS, impacts related to residential and business displacements would be addressed in compliance with the Uniform Relocation Act to ensure relocation is conducted in a way to minimize the impacts to businesses and residents who may be displaced by the HSR Build Alternative. SOCIO-IAMF#2 would provide relocation assistance to all residents and businesses displaced by the HSR Build Alternative in compliance with the Uniform Act, and SOCIO-IAMF#3 would establish an appraisal, acquisition, and relocation process in consultation with affected cities, counties, and property owners. These IAMFs would minimize the potential for construction of the HSR Build Alternative to relocate residents and businesses outside their existing communities.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-739

The commenter requests an extension of the public comment period. Refer to response to comment 692-730 regarding the extension of the public comment period to August 31, 2020. Additionally, the commenter requests that the virtual public hearing schedule for July 8, 2020 be postponed. The Authority provided a variety of forums for the public to engage directly with the project team to ask questions and discuss concerns, including virtual “office hours” meetings throughout the public review period; information meetings with the Taylor Yard community on July 20 and with the Lincoln Heights community on August 25; and, telephone town hall meetings on June 29 and August 19. These meetings were in addition to the required public hearing held on July 8.

692-740

The commenter requests an extension of the public comment period. Refer to response to comment 692-730 regarding the extension of the public comment period to August 31, 2020.

692-741

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

The commenter states that the proposed Main Street overpass would have detrimental consequences for businesses and residential neighborhoods in Lincoln Heights.

As described in Section 3.12.6.3, access to some neighborhoods, businesses, and community facilities may temporarily be disrupted from road closures and detours during construction. However, access to the neighborhoods, businesses, and community facilities would not be eliminated. If roadways require closure or relocation, alternate access would be identified, and detours would be provided prior to closure for continuity of access to neighborhoods. Implementation of TR-IAMF#2, which requires the preparation of a construction transportation plan, which would minimize access disruptions on to residents, businesses, customers, delivery vehicles, and buses by limiting any road closures to the hours that are least disruptive to access for the adjacent land uses and ensuring safe vehicular and pedestrian access to local businesses and residences during construction.

Additionally, the Main Street overpass would not result in disruptions in access because circulation would be improved on local streets by eliminating wait times at railroad crossings. The permanent street reconfigurations would improve access and community circulation by eliminating the rail corridor as a barrier or impediment to travel.

In response to public comments on the Draft EIR/EIS, design changes were made to the Main Street Grade Separation to further reduce impacts to the community to the extent feasible. Refer to Section 3.12.6.3 of this Final EIR/EIS for an updated discussion of impacts.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-742

The commenter expresses concern that Main Street would be reduced to one lane each way, increasing traffic on this roadway. Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. In addition, construction period impacts caused by the lane closures would be temporary in nature, and would be avoided and/or minimized by the Construction Safety Transportation Management Plan (CSTMP) required by SS-IAMF#1 and the Construction Transportation Plan required by TR-IAMF#2.

692-743

This comment suggests that toxic pollutants will result in impacts to sensitive receptors in the project vicinity during the construction period. Construction-related criteria pollutants and toxic air contaminants were assessed in Section 3.3.6.3. Specifically, the Main Street grade separation construction area, which is located adjacent to the Lincoln Heights area, was assessed. Sensitive receptors, which include residences, Albion Elementary School, and recreational parks surrounding the Main Street grade separation construction area were included in the air quality analysis and health risk assessment. The Draft EIR/EIS, Section 3.3, Air Quality and Global Climate Change, provided a summary of the air quality impact analysis associated with the Main Street Overcrossing Construction Area and determined the air quality impacts to be less than significant under CEQA for all criteria pollutants in the community of Lincoln Heights (refer to Table 3.3-17 of the Draft EIR/EIS). It should be noted that the regional construction impact would be significant for nitrogen dioxide (NO₂) and carbon monoxide (CO) pollutants (as shown in Table 3.3-16 on pages 3.3-50 through 3.3-52). All other criteria pollutants (volatile organic compounds [VOC], sulfur dioxide [SO₂], particulate matter less than or equal to 10 microns in diameter [PM₁₀], and particulate matter less than or equal to 2.5 microns in diameter [PM_{2.5}]) were found to be less than significant under CEQA. Appendix G of the Burbank to Los Angeles Project Section Air Quality and Global Climate Change Technical Report (California High-Speed Rail Authority [Authority] 2020) provided the health risk assessment associated with the Main Street Grade Separation Construction Area and determined the human health risk (including children) to be less than significant (refer to Table 7-54 on page 7-47 in Appendix G).

As described in Section 3.3.4.3 of this Final EIR/EIS, the project incorporates standardized HSR features to avoid and minimize air quality impacts. These impact avoidance and minimization features (IAMF) substantially reduce emissions from the project.

For example, AQ-IAMF#4 requires the use of Tier 4 engines to reduce criteria exhaust emissions from construction equipment. AQ-IAMF#5 requires the use of newer-model-year on-road construction trucks. TR-IAMF#7 requires the use of construction truck routes away from sensitive receptors.

Long-term health consequences of the project are not anticipated based upon the air quality analysis and health risk assessment prepared for the project. No revisions have been made to the Final EIR/EIS in response to this comment.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-744

The commenter states that the EIR/EIS did not address noise and air quality impacts to Albion Elementary School as part of the EJ analysis and that Albion Elementary School officials and parents were never contacted as part of the EJ outreach program. Refer to Responses to Comment 692-743 and 692-746 which address air quality and noise impacts to Albion Elementary School.

Additionally refer to Section 5.6.3.1, Impact EJ#2 for a discussion of air quality impacts on low-income and minority populations during construction. While construction of the HSR Build Alternative would exceed the significance thresholds for NOx on a temporary basis, these impacts would not be adverse because no localized adverse health effects are predicted to occur. Therefore, the HSR Build Alternative would not result in disproportionately high, adverse effects related to air quality on low-income and/or minority populations living within the EJ RSA.

As shown in Section 9.5, Table 9-3, Burbank to Los Angeles Project Outreach Activity, outreach events included an Albion Street Elementary School Briefing on February 17, 2017, and a Los Angeles Unified School District Office of Environmental Health and Safety Briefing on December 6, 2016.

In addition, as described in Section 5.6.3.1, the Authority will implement EJ-IAMF #1, which was not identified in the Draft EIR/EIS. EJ-IAMF#1 creates an ombudsman position to address the needs of EJ communities adversely affected by construction impacts such as street closures and detours. The position will act as a single point of contact for property owners, residents, and tenants in EJ communities with potential adverse construction impacts.

692-745

Refer to Standard Response BLA-Response-Section 3.2 TRAN-01: Temporary Traffic Impacts.

The commenter states that Albion Riverside Park would have no access points due to construction detours. Refer to Standard Response BLA-Response-Section 3.2 TRAN-01: Temporary Traffic Impacts. As described in Section 2.5.2.9 of this Final EIR/EIS, the Main Street bridge grade separation is an early action project and would be constructed in collaboration with the City of Los Angeles, as the local agency with jurisdiction over Main Street. Local may take the lead on coordinating the construction of these early action projects. As Responsible Agencies under CEQA, local agencies may adopt their own findings and mitigation measures as needed to construct these projects. Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. The revised design limits truck access between Gibbons Street and Albion Street to reduce the potential for motorists to access I-5 via Albion Street.

There is no plan to use Albion Riverside Park land for parking construction equipment. Access to Albion Riverside Park may be affected temporarily during construction. However, the park would remain open for park users, including the existing parking on S Avenue 17. The HSR Build Alternative is not expected to result in a significant increase in truck traffic on local roads as a result of the improvements for the Main Street bridge.

692-746

The commenter expresses concerns regarding potential health effects of construction-related noise and vibration. NV-IAMF#1 described in Appendix 2-B of this Final EIR/EIS addresses construction noise and vibration levels. It requires the contractor to develop a noise and vibration mitigation plan that will minimize the noise and vibration impacts from construction on sensitive receptors within 1,000 feet of the construction area. The Noise and Vibration Mitigation Plan required by NV-IAMF#1 will take into account duration of the noise impacts and will mitigate both short and long-term effects of construction noise and vibration. No changes have been made to the Final EIR/EIS in response to this comment.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-747

Refer to Standard Response BLA-Response-Chapter 5 EJ-01: Environmental Justice Communities.

The commenter expresses concern about noise, vehicle congestion, and air quality impacts of exhaust on the community's minority populations, especially when the community already suffers from poor air quality and may never use the HSR system for work or travel. The Authority shares the commenter's concerns regarding the HSR project's impacts on minority and low-income populations and has rigorously addressed impacts on these populations in Chapter 5, Environmental Justice, of this Final EIR/EIS.

692-748

The commenter requests that the Authority extend the public comment period to be consistent with the Governor's Executive Order N-33-20. Refer to response to comment 692-730 regarding the extension of the public comment period.

692-749

The commenter states that additional time should be provided for a more robust public engagement process considering low-income and minority populations and seniors who may have limited access to the EIR/EIS.

The Burbank to Los Angeles Project Section Draft EIR/EIS was originally made available for a minimum 45-day public review beginning on May 29, 2020, and ending on July 16, 2020. The Authority then extended the comment period to end on July 31. The comment period was extended again to August 31, 2020, in response to agency and stakeholder requests in consideration of limitations caused by the novel coronavirus pandemic. In total, the duration of the 45-day public comment period was extended to a total of 94 days (from May 29, 2020, through August 31, 2020) so that interested parties would have sufficient time to review the Draft EIR/EIS.

In addition to posting sections of the Draft EIR/EIS on the Authority's website, a printed copy of the Draft EIR/EIS was made available at Caltrans District 7 Headquarters, 100 S Main Street, Los Angeles, CA 90012. Printed and/or electronic copies of the Draft EIR/EIS and electronic copies of associated technical reports were also made available for review during business hours at the Authority's Southern California Regional Office at 355 S Grand Avenue, Suite 2050, Los Angeles, CA 90071.

692-750

The commenter expresses concern related to emergency access and truck access during construction related to crossing gates at Main Street. As described in response to comment 692-745, above, the early action projects include the Main Street bridge element, which would provide a grade separation of the Los Angeles River railroad crossing points on Main Street. Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. In addition, the delays cited by the commenter would occur if the grade crossing were left intact. However, with construction of the Main Street bridge and grade separation, as included in the early action projects, the delays of the crossing gates at Main Street would not occur and no significant impacts related to access would occur.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-751

The commenter expressed some operational concerns with the current conceptual design of the Main Street Grade Separation. The design for the Main Street Grade Separation has been refined and the Authority has and will continue to work with the City of Los Angeles and local stakeholders regarding this design. Section 2.5.2.9 shows a revised overview figure of the design, while the drawings can be found in Volume 3 of this Final EIR/EIS, specifically in Volume 3: Grade Separations. The street network has been revised to address stakeholder concerns regarding circulation, including providing a direct connection between Lamar Street and the new Main Street, removing a connection between Lamar Street and Clover Street, and maintaining the existing Clover/Main intersection conditions.

692-752

The comment states that most of the businesses shown on Figure 1 in the KOA memorandum would need to be acquired rather than potentially affected. In response to public comments on the Draft EIR/EIS, design changes were made to the Main Street Grade Separation to further reduce impacts to the community to the extent feasible. Revisions have been made to Volume III and Appendix 3.12-D, Property Acquisitions and Easements, of this Final EIR/EIS.

692-753

The commenter expresses concern that the design of the Main Street bridge will result in Albion Street as a new cut-through route for industrial traffic to enter Interstate (I) 5 at Broadway. The Main Street bridge grade separation is included as an early action project and would span the railroad corridors on either side of the Los Angeles River. Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. The revised design would include a connection between Albion Street and Gibbons Street, but it would restrict truck traffic; a direct connection between Lamar Street and Main Street would also be maintained. Therefore, trucks would not be able to access Albion Street to cut through the residential neighborhood to access I-5.

692-754

Refer to Standard Responses BLA-Response-Section 3.12 SOCIO-01: Relocations, ROW Process, Eminent Domain, BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

The commenter states that the acquisition of these parcels near the Main Street Grade Separation would leave small remainder parcels after the construction of the Main Street overpass and that the Draft EIR/EIS should include a description of the disposition program to accompany the right-of-way purchase plan.

In response to public comments on the Draft EIR/EIS, design changes were made to the Main Street Grade Separation to reduce impacts to the community to the extent feasible. Refer to Section 3.12.6, Impact SOCIO#3 and Impact SOCIO#4 of this Final EIR/EIS for a revised discussion on residential and business displacements.

Additionally, as described under Section 3.12.6.3 of this Final EIR/EIS, although construction of the HSR Build Alternative would have permanent disruptive impacts related to residential and business displacements, SOCIO-IAMF#2 would provide relocation assistance to all residents and businesses displaced by the HSR Build Alternative in compliance with the Uniform Act, and SOCIO-IAMF#3 would establish an appraisal, acquisition, and relocation process in consultation with affected cities, counties, and property owners. These IAMFs would minimize the potential for construction of the HSR Build Alternative to relocate residents and businesses outside their existing communities.

As described in Section 3.13.6.3, Impact LU#2, following construction of the HSR Build Alternative, the Authority would evaluate whether all acquired land extending outside the area required for operation and maintenance of the HSR Build Alternative would be needed long term. If not, the Authority may declare the property excess so the land may be disposed. To do so, the Authority would need to follow procedures set forth in Public Utilities Code Section 185040, which regulates the sale or exchange of property owned by State agencies. The sale and redevelopment of any land declared excess (i.e., remnant parcels) would allow such land to revert to its previous existing use or developed with uses in accordance with applicable local government land use plans and regulations. SOCIO-IAMF#2 and SOCIO-IAMF#3 describe the disposition program for

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-754

small remaining (remnant) parcels.

Therefore, no revisions have been made to this Final EIR/EIS in response to this comment.

692-755

The comment states that the Lamar Street rerouting onto Main Street would require the commercial parking lot on the southwest corner of Main Street and Lamar Street to be modified to the point that it may not be able to support the existing commercial development on that parcel.

An updated design for the Main Street Grade Separation is now presented in this Final EIR/EIS. The engineering design shows a realignment of Lamar Street as it intersects the new configuration of Main Street. However, in recognition of the challenge associated with reconfiguring the parking lot on the southeast quadrant of the intersection and the need to accommodate an emergency access road, the commercial property on the southwest corner of Lamar Street and Main Street is now proposed as a full acquisition. This would result in displacement of the existing business on this property. As described in Section 3.12 of the Draft EIR/EIS, SOCIO-IAMF#3 would establish an appraisal, acquisition, and relocation process in consultation with affected cities, counties, and property owners.

The updated property acquisitions are shown in Appendix 3.12-D, Property Acquisitions and Easements, of this Final EIR/EIS.

692-756

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

The commenter expresses concern regarding the design of the Main Street overpass and provides recommendations for mitigation measures. The commenter requests large turning radii on the corners of Clover Street and Main Street and the new east-west street. Refer to BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation for information about the Main Street Grade Separation and the design refinements made at this location in response to public comments. Specific responses to this comment are provided below.

As described in response to comment 692-745, in this Final EIR/EIS, the Main Street Grade Separation is included as an early action project, and recommended roadway design and control treatments will be considered by the Authority or the City of Los Angeles during final design. As responsible agencies under CEQA, local agencies may adopt their own findings and mitigation measures as needed to construct these projects. The commenter requests parking prohibitions to provide increased travel lane width on Clover Street. This request would be considered including roadway operations, safety, and design geometry in coordination with the City of Los Angeles during the final stages of project planning, to be implemented before project construction activities begin, and to otherwise be in place by the completion of construction, depending on need and roadway configurations during each phase. However, based on the refined design of the Main Street Grade Separation, Lamar Street would connect to Main Street, reducing the reliance on Clover Street for truck traffic. Chapter 2 of this Final EIR/EIS, has been revised to describe the updated design for the Main Street Grade Separation Early Action Project.

The commenter requests a signal at Clover Street and Main Street to address safe truck movement. The refinement of the Main Street Grade Separation would no longer route all trucks to Clover Street and would reduce potential traffic at this intersection. In addition, trucks in the area currently have access to Albion Street, Avenue 19, and other routes that connect locally to Broadway, whether or not they are designated truck routes. Furthermore, the local roadway routes to Broadway are slow, with many all-way stop signs at intersections. There are also many existing industrial uses on the north side of Main Street near these roadways that generate truck traffic in the area, including the local roadways. The HSR Build Alternative is not expected to result in a significant

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-756

increase in truck traffic on local roads as a result of the improvements for the Main Street bridge.

The commenter requests replacement of directional signage related to routing customers of the San Antonio Winery. The direct connection at Lamar Street and Main Street would be maintained providing local business access south of Main Street. The main entrance to customer parking for the Winery is on Lamar Street, with an exit only access via Gibbons Street. No directional signage to reroute arriving customers would be necessary. The existing directional signs on the Winery buildings would not require modification with the project.

The commenter requests the preparation of a Neighborhood Traffic Management Plan to address increased trucks on Lamar Street, Gibbons Street, and Albion Street. As described in response to comment 692-753, the refined design of the Main Street Grade Separation would no longer include a connection between Albion Street to Gibbons Street and Lamar Street; however, a direct connection between Lamar Street and Main Street would be maintained. Therefore, trucks would not be able to access Albion Street to cut through the residential neighborhood to access I-5. Trucks would use Lamar Street and Clover Street for access to Main Street and I-5. TR-IAMF#2 (Construction Transportation Plan) requires a management plan be implemented as part of project construction planning, to minimize impacts to the area during construction roadway closures and other activities.

692-757

The commenter expresses concern regarding post-project circulation near Main Street and Wilhardt Street. Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. Where parcel parking is to be acquired as part of the HSR project, replacement parking options would be identified and constructed by the Authority in cooperation with local property owners, as necessary. As described in Section 3.2.3.6 of this Final EIR/EIS, the HSR Build Alternative was designed to provide adequate emergency access. Operations and maintenance of HSR Build Alternative would result in impacts that would be less than significant under CEQA because there would be no transit, bicycle, pedestrian, or aviation policy, plan, facility, or program conflicts and because performance and safety would not be negatively affected. Additionally, implementation of TRAN-MM#2 would benefit local circulation in the area by improving traffic operations at these intersections.

692-758

The commenter expresses concern regarding the criteria for defining the resource study area (RSA) and whether it was applied consistently. As discussed in Section 3.2.4 of this Final EIR/EIS, the RSA consists of the project footprint, plus intersection and roadway segments that are affected by the HSR Build Alternative, based on certain criteria including general estimates of project traffic generation and distribution from station areas, traffic detours during construction, and new roadway construction. The RSA was refined as the design, project footprint, and ridership and vehicle trip projections were updated.

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

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-759

The commenter expresses concern that the study intersections do not include Main Street and Clover Street. Section 3.2 of the Draft and Final EIR/EIS only discusses intersections where impacts exceed the level-of-service (LOS) thresholds. The Burbank to Los Angeles Project Section Transportation Technical Report (TTR) (Authority 2020) included results at all of the intersections and is available upon request from the Authority. As intersection #1013 would be reconfigured as part of the HSR Build Alternative and control would be added (i.e., a traffic signal), it is analyzed as a special added study intersection with the ID number of 1013. This intersection was analyzed for plus-project conditions in Table 6-19 (year-2029 conditions), Table 6-24 (year-2040 conditions), and Table 6-32 (construction-period conditions) of the TTR. As demonstrated in the TTR, for the opening year (2029) the Clover Street/Avenue 17 intersection would operate at LOS D during the a.m. and p.m. peak hours. In the horizon year (2040), the Clover Street/Avenue 17 intersection would operate at LOS D during the a.m. peak hour and at LOS C during the p.m. peak hour. The intersection would not operate at poor LOS (LOS E or F) or exceed the LOS thresholds. Furthermore, Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. The revised design would provide direct access to Main Street via Lamar Street. The reduced reliance on the Main Street/Clover Street intersection from the revised design would improve traffic conditions.

692-760

The commenter expresses concern with the ramp analysis provided in the Draft EIR/EIS. The Authority has developed guidelines that define a project-related ramp vehicle volume that is applied to determine the inclusion of ramp locations in the impact analysis. The current Los Angeles Department of Transportation (LADOT) traffic study guidelines of July 2020 do not define a ramp analysis requirement based on minimum vehicle volume. The included ramp locations are listed and analyzed in Table 6-7 (Los Angeles Union Station [LAUS] area no-project conditions), Table 6-8 (Burbank Station-area no-project conditions), Table 6-25 (LAUS-area impacts), and Table 6-26 (Burbank Station-area impacts) of the TTR. The TTR is available upon request from the Authority. No revisions to this Final EIR/EIS have been made in response to this comment.

692-761

The commenter expresses concern regarding the thresholds utilized to determine significance. The Authority, as the Lead Agency, has developed impact analysis guidelines and thresholds of significance that are consistent for all HSR project segments throughout the State of California. These guidelines as quoted have been consistently applied across all HSR segment RSAs in the TTR and this Final EIR/EIS. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-762

The commenter expresses concern regarding the thresholds utilized to determine significance. The Authority, as the Lead Agency, has developed impact analysis guidelines and thresholds of significance that are consistent for all HSR project segments throughout the State of California. The peak-hour capacity of a roadway is determined by the number of lanes and the roadway category (facility type). The peak-hour capacities by roadway type used in the Draft EIR/EIS analysis vary by area type such as urban, urban business, and so on. The operations analysis of roadway segments was conducted using roadway capacity values defined by the SCAG regional travel demand model. In addition, the hourly and daily volume capacities applied to the included RSA segment analysis locations were defined by the Southern California Association of Governments (SCAG) regional travel demand model, as documented in the introduction to Table 4-4 of the TTR. The TTR is available upon request from the Authority. No revisions to this Final EIR/EIS have been made in response to this comment.

692-763

The commenter expresses concern with the operational LOS analysis provided for Main Street. When analyzing a roadway segment or intersection, the goal of the impact analysis is to review operations and capacity for that individual location on the roadway network. The RSA segments on either side of the Los Angeles River on Main Street were included to analyze the potential effects of the Main Street bridge structure at that location. Intersection LOS analyses were conducted using the traffic counts, analyzed and processed volumes, and fieldwork and other data within the Synchro analysis program. The segment analysis provided in Section 3.2 of this Final EIR/EIS evaluates the general cross-sectional configuration of the roadway segment and the adequacy of capacity (number of travel lanes). No revisions to this Final EIR/EIS have been made in response to this comment.

692-764

The commenter expresses concern that detailed information is referenced back to the TTR. It is common practice to provide an overview of transportation impacts (and most other resource areas) in the environmental document and provide the detailed calculations and other details in the technical reports. This minimizes the length of the main document to provide an overview and significance determinations for all impact areas.

The commenter also expresses concern regarding the results of the traffic analysis compared to findings from other development projects. The analysis of freeway off-ramp locations and queuing was based on no-project conditions and the effects of the HSR Build Alternative on those queues. The presence or nonpresence of no-project queuing issues does not determine impacts, but rather provides a baseline for comparison purposes. The analysis discusses the increase of queues beyond this baseline as a result of the HSR Build Alternative and the need for mitigation. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-765

The commenter expresses concern regarding whether the LAUS Forecourt Project was considered in the analysis. The Forecourt Project was not a fully designed project when the traffic analysis was initiated in 2015 and finalized in the *Transportation Technical Report* (Authority, 2020). The final design of the project, including reductions in travel lanes on Alameda Street, was published later and impacts of that project on Alameda Street traffic operations are analyzed in the environmental documentation for that project. That documentation was completed after the HSR project environmental analysis had been initiated.

The RSA study intersections on Alameda Street outside of freeway ramp locations, which would not be modified as part of the Forecourt Project, operate at LOS A to C based on the interim and buildout project year analysis. Section 3.2 of the Draft and Final EIR/EIS only discusses intersections where impacts exceed the level-of-service (LOS) thresholds. The *Burbank to Los Angeles Project Section Transportation Technical Report* (TTR) (Authority 2020) included results at all of the intersections. The lane modifications on Alameda Street included as part of the Forecourt Project are not anticipated to reduce level of service to such a degree that the impact of the HSR Build Alternative on these intersections would change. It is assumed that no new project impacts would occur, the conclusions in the EIR/EIS remain valid, and no additional project traffic analysis is required.

692-766

The commenter expresses concern for the baseline conditions utilized in the analysis. It is typical to analyze construction-period conditions against existing conditions at the time of the technical analysis in order to isolate potential impacts without the addition of volumes from other development projects and ambient traffic growth. As the technical analysis for the TTR was initiated in 2015, this provided the appropriate baseline conditions for the analysis. In addition, the TTR (Authority 2020) includes additional data and analysis on traffic effects for the assumed 2029 opening year of Phase 1 HSR service. The Draft and Final EIR/EIS include the 2040 analysis, but any differences for 2029 are footnoted in the tables. No revisions to this Final EIR/EIS have been made in response to this comment.

692-767

The commenter requests that the intersection numbers be added throughout the document and a table for LOS after mitigation be included. Section 3.2 of this Final EIR/EIS has been revised to include the intersection numbers. In addition, per current CEQA guidelines, LOS metrics cannot be used to determine the significance of impacts under CEQA. For CEQA impacts, the VMT metric is analyzed, and this is provided as a regionwide value for each analyzed project year, as the mobility network must be evaluated as a whole in the statewide HSR model to acknowledge shifts between auto and rail modes and travel routes and provide the resulting regional VMT change. Vehicle delay and LOS metrics are provided in the transportation analysis to show patterns of traffic impacts for review by local agencies. In addition, LOS is still used in NEPA analysis to characterize the transportation setting and consequences of the action. As there are no significant impacts requiring mitigation under CEQA, the LOS after mitigation is not included in the analysis. Furthermore, NEPA does not require the Authority to implement the mitigation measures identified and therefore, these mitigation measures have been described as “available”.

692-768

The commenter expresses concern for detours related to Main Street and that Section 3.2 in the Draft EIR/EIS did not include a discussion of the amount of time that Main Street would be closed. Specific detour routes and the duration of street closures will be identified during final design. The Authority would identify specific detour routes and the duration of street closures as part of the Construction Transportation Plan required by TR-IAMF #2. The Construction Transportation Plan would include provisions to minimize access disruption to residents, businesses, customers, delivery vehicles, and buses to the extent practicable. Where road closures are required during construction, these closures will be limited to the hours that are least disruptive to access for the adjacent land uses. Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-769

The commenter expresses concern that the Main Street and Clover Street intersection is not listed in the Draft EIR/EIS. Refer to response to comment 692-759, above. As stated in that response, Chapter 2 of this Final EIR/EIS has been revised to include an updated design for the Main Street Grade Separation Early Action Project. The revised design would provide direct access to Main Street via Lamar Street. The reduced reliance on the Main Street/Clover Street intersection from the revised design would improve traffic conditions.

692-770

The commenter expresses concern regarding the RSA and segments analyzed. The hourly and daily volume capacities applied to the included RSA segment analysis locations were defined by the Southern California Association of Governments (SCAG) regional travel demand model, as documented in the introduction to Table 4-4 of the TTR. Refer to response to comment 692-762, contained in this chapter for a more detailed response.

692-771

The commenter expresses concern regarding peak-hour operational LOS for roadway segments. The RSA roadway segments were included in the locations specified in the TTR and analysis of the Draft EIR/EIS per the guidelines established by the Authority. Analysis of multiple roadway intersections in the downtown Los Angeles area were included in the TTR and the Draft EIR/EIS. However, the study is defined by the RSA, and the study road segments were LOS D or better. The TTR and the Draft EIR/EIS draw no conclusions about streets outside the RSA. No revisions to this Final EIR/EIS have been made in response to this comment.

692-772

The commenter expresses concern that the Main Street/Clover Street intersection is not listed in the Draft EIR/EIS. The Authority does not plan to signalize the Main Street/Clover Street intersection as a result of impacts associated with the project. Refer to response to comment 692-759, contained in this chapter for a more detailed discussion of why.

692-773

The commenter expresses concern regarding traffic impacts related to the Main Street bridge and associated roadway improvements. Chapter 2 of this Final EIR/EIS has been revised to include an updated design for the Main Street Grade Separation Early Action Project. Refer to response to comment 692-753, contained in this chapter.

692-774

The commenter states a mitigation program would be required for the Main Street overpass. Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. In addition, the HSR Build Alternative would produce traffic control plans as part of the final design package for the Main Street bridge. As discussed in Section 3.2.4.2 of this Final EIR/EIS, this will be completed as part of TR-IAMF#2, Construction Transportation Plan. TR-IAMF#2 would require the contractor to prepare a detailed Construction Transportation Plan (CTP) for minimizing the impact of construction and construction traffic on adjoining and nearby roadways while maintaining traffic flow during peak travel periods.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-775

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

The comment suggests that the analysis of the visual and noise impacts of the HSR project and the Main Street overpass on Albion Park and nearby residential neighborhood should be improved and explained more thoroughly.

As described in Section 3.15.6, Impact AVQ#3, the new Main Street Bridge would have a neutral impact on visual quality in the park because, while the new bridge would introduce a high visual change to the area (which is near Key Viewpoint 20), the bridge would be consistent with existing industrial land uses, resulting in low viewer sensitivity to the visual change. Additionally, refer to Standard Response, BLA-Response-Section 3.16 A&VQ-01: Visual Impacts Related to Grade Separations; Section 3.4.6, Impact N&V#4 and Impact N&V#7, Noise and Vibration; and Section 3.16.6, Impact AVQ#3, Aesthetics and Visual Quality for a detailed analysis of impacts related to noise and aesthetics along the HSR alignment.

A detailed noise analysis is provided in Burbank to Los Angeles Project Section: Noise and Vibration Technical Report (Authority 2020) and a detailed visual impact analysis is available in Burbank to Los Angeles Project Section: Aesthetics and Visual Quality Technical Report (Authority 2020), available on request to the Authority.

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

692-776

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation for general information regarding road closures and detours during construction. More specific information addressing this comment is provided below. The commenter expresses concerns regarding traffic impacts of the Main Street overpass on schools. Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation. Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. The traffic data analyzed for the Main Street bridge structure and the removal of the grade crossings at the Los Angeles River do not indicate that the HSR Build Alternative would result in induced travel demand to the extent that there would be new significant impacts to land uses in the corridor, including schools. Main Street is an arterial roadway and volumes are very low in relation to the designed capacity, as shown by the segment analysis (see Table 3.2-10 in Section 3.2.5.3). As discussed in Section 3.2.7.1, Mitigation Measure TRAN-MM#1 would be implemented to address temporary construction-related impacts for the Main Street grade separation, and the early action projects would not result in operational traffic impacts. No transportation mitigation measures are applicable to the early action projects for operations impacts. Therefore, no significant transportation impacts related to the Main Street grade separation would occur related to schools.

Response to Submission 692 (Steve Riboli, San Antonio Winery, Inc, June 23, 2020) - Continued

692-777

The commenter expresses concern regarding traffic impacts to Main Street and S Avenue 21. The access to the local neighborhood referenced by the comment, along Main Street via the southbound I-5 off-ramp and Avenue 21, is provided by a right turn at the Avenue 21/Main Street intersection. This maneuver (a right turn onto Main Street) is aided somewhat by the restriction of upstream volume from the traffic signal at Daly Street/Main Street when Main Street westbound traffic is stopped there. The Daly Street signal then accommodates the reverse movement back to northbound I-5. The intersection of Main Street and South Avenue 21 is not included in the study area intersections analyzed in the RSA. However, as discussed in the Transportation Technical Report (Authority, 2020), Avenue 20 at Main Street would continue to operate at LOS B in both 2029 No Project and Plus Project Conditions during both the AM and PM Peak Hour. Furthermore, for the Horizon Year 2040 this intersection would operate at LOS A in the AM Peak Hour and LOS B in the PM Peak Hour. Therefore, the HSR Build Alternative would not generate additional traffic volumes and increased neighborhood cut-through traffic in these locations. In addition, the HSR Build Alternative would not result in potentially significant impacts to the Main Street/Avenue 21 intersection, so mitigation is not proposed for that location. For these reasons, forecast traffic conditions and the limited diversion of existing trips is not expected to result in significant impacts to these roadways. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 800 (Jack Sanchez, Sanchez Farms, August 12, 2020)

Burbank - Los Angeles - RECORD #800 DETAIL

Status : Action Pending
Record Date : 8/12/2020
Submission Date : 8/12/2020
Interest As : Business and/or Organization
First Name : Jack
Last Name : Sanchez

Stakeholder Comments/Issues :

800-1438

Tunnel through the San Gabriel mountains for the best route to downtown LA.

Response to Submission 800 (Jack Sanchez, Sanchez Farms, August 12, 2020)

800-1438

Refer to Standard Response BLA-Response-Chapter 2 Alt-01: Alternatives.

The commenter expresses concern over the range of alternatives and requests consideration of a tunnel alignment through the San Gabriel Mountains. The commenter's opinion of the HSR Project is acknowledged. Please refer to Standard Response BLA-Response-Chapter 2 Alt-01: Alternatives for more information about the range of alternatives. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 773 (Darrell Clarke, Sierra Club Angeles Chapter, July 31, 2020)

Burbank - Los Angeles - RECORD #773 DETAIL

Status : Action Pending
Record Date : 7/31/2020
Submission Date : 7/31/2020
Interest As : Business and/or Organization
First Name : Darrell
Last Name : Clarke

Stakeholder Comments/Issues :

773-1243 | The Sierra Club strongly supports California High Speed Rail as an alternative to fossil fuel use by intrastate jet flights and long car drives, plus highway and airport expansion (https://angeles.sierraclub.org/news/blog/2015/06/chapters_stance_californias_high_speed_rail_project). The Burbank to Los Angeles Draft EIR/EIS has documented CHSRA's well-planned proposal to add two high speed rail tracks predominantly within the existing railroad right-of-way.

Response to Submission 773 (Darrell Clarke, Sierra Club Angeles Chapter, July 31, 2020)

773-1243

Refer to Standard Response BLA-Response-GENERAL-04: General Support.

The commenter expresses their support for the HSR project. The commenter's support for the HSR Build Alternative is acknowledged.

Submission 625 (Marvin Arevalo, SoCal Gas, June 3, 2020)

Burbank - Los Angeles - RECORD #625 DETAIL

Status : Action Pending
Record Date : 6/3/2020
Submission Date : 6/3/2020
Interest As : Business and/or Organization
First Name : Marvin
Last Name : Arevalo

Stakeholder Comments/Issues :

625-642 | I'm a planner for the Gas Company. We are abandoning a Main at 4901 W San Fernando Rd, Los Angeles and would like to know what requirements are needed for your approval?

Thank you,

Marvin Arevalo
Planning Associate
Chatsworth HQ/Northwest Region
9400 Oakdale Ave,
Chatsworth, CA 91311
(818) 701-3331
marevalo@socalgas.com<mailto:marevalo@socalgas.com>
[work2]

Response to Submission 625 (Marvin Arevalo, SoCal Gas, June 3, 2020)

625-642

The commenter inquires about the requirements necessary for the California High-Speed Rail Authority's (Authority) approval of the abandonment of a gas main line located at 4901 W San Fernando Road. As discussed in Section 3.6.6.3 of this Final EIR/EIS, although the California High-Speed Rail (HSR) Project may have impacts on existing utilities, the approval of abandonment of an existing gas main would not fall under the Authority's jurisdiction. As such, the abandonment of this main would not require any approvals by the Authority and would be subject to the regulations imposed on the Southern California Gas Company (SoCalGas) by the California Public Utilities Commission.

Submission 900 (Jill Sourial, The Nature Conservancy in California, August 31, 2020)

Burbank - Los Angeles - RECORD #900 DETAIL

Status : Action Pending
Record Date : 9/3/2020
Submission Date : 8/31/2020
Interest As : Business and/or Organization
First Name : Jill
Last Name : Sourial
Attachments : TNC HSR Comment letter_Burbank to LAUnionStation08312020.pdf (764 kb)

Stakeholder Comments/Issues :

On behalf of The Nature Conservancy please find our comment letter attached.

Thank you.
Jill Sourial

Jill Sourial
 Director, Urban Conservation
 Direct Line: (213) 787-9414
 Cell: (213) 926-4785
jill.sourial@tnc.org <<mailto:jill.sourial@tnc.org>>

nature.org <<http://nature.org/>>
[mundotnc.org](http://www.mundotnc.org/) <<http://www.mundotnc.org/>>

?
 The Nature Conservancy
 445 South Figueroa Street
 Suite 1950
 Los Angeles, CA 90071

? [TNC Logo]



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August 31, 2020

California High-Speed Rail Authority
 Burbank to Los Angeles Draft EIR/EIS Comment
 355 S Grand Avenue, Suite 2050
 Los Angeles, CA 90071
 Email: Burbank_Los.Angeles@hsr.ca.gov

Re: Comments on Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the Burbank to Los Angeles Project Section of the California High-Speed Rail Project

Dear California High-Speed Rail Project Team:

The Nature Conservancy (TNC) is a science-based organization that works throughout the world to identify conservation solutions and habitat enhancements that serve both people and nature. In California we have worked together with multiple agencies and partners to protect over 1.5 million acres of land and thousands of river miles. In the Los Angeles region, TNC is working with partners including CA State Parks, the Wildlife Conservation Board, Mountains Recreation Conservancy Authority (MRCA), and other local, State and Federal Agencies to support Los Angeles River revitalization efforts as well as the 100-acre partnership that has been established at Taylor Yard. www.100acrepartnership.org. High Speed Rail implementation in this location has the potential to impact communities that are already severely constrained by freeways, rail facilities, and a lack of access to open space. If designed and constructed in the least impactful way and using the latest science to evaluate and mitigate for the impacts, there is an opportunity to improve conditions in communities that have suffered a disproportionate burden from large infrastructure projects for over a century.

TNC thanks the High-Speed Rail Authority for providing a platform for us to comment on the Draft Environmental Impact Review (DEIR) for the Burbank to L.A. Union Station Project Section (Project). We appreciate the additional time extension granted for review however, the document is quite substantial and complex. The DEIR was sent out for review during COVID-19, a pandemic that has changed the structure of how we live, communicate and work. Due to this, a further extended timeline, would have been helpful to our evaluation and for commenting on the document. In addition, for the Burbank to L.A. Union Station Project Section, CHSRA could have communicated better with the public and previously engaged stakeholders prior to the DEIR release, to provide a better understanding of the Project. It would have been very helpful to facilitate a more thoughtful review by giving a public presentation at which multiple stakeholders and the public could have been included to better understand the rationale and thought processes behind the HSR alternatives and the preferred alternative. A presentation could have enabled multiple stakeholders to have asked questions, and to feel part of the process and make the process more transparent. A similar approach was used productively with stakeholders including TNC for the San Jose-Merced segment, which resulted in sharing of scientific studies and data between the environmental organizations and CHSRA. This further resulted in changes to the design of the preferred alternative to improve the segment's design to avoid

900-1784

900-1785

900-1786

Submission 900 (Jill Sourial, The Nature Conservancy in California, August 31, 2020) - Continued

900-1786 | some impacts to key landscapes and species prior to publication of the Draft EIR/EIS and selection of the preferred alternative. Going forward, TNC encourages CHSRA to hold both a public presentation and a focused presentation to TNC and other environmental groups to allow stakeholders to ask questions, feel more informed, and provide relevant information.

TNC DEIR Comments:

900-1787 | **In the Section 4(f) evaluation, the DEIR does not include the Bowtie Parcel and this should be corrected.** The Bowtie Parcel is a key component of the 100-acre partnership between MRCA, State Parks, and City of Los Angeles at Taylor Yard. CA State Parks purchased the Bowtie Parcel in 2003. The site has been used since that time for a variety of interim public and community events, including art and ecological installations, river clean-ups, and other State Parks functions. Since its purchase, State Park's intention for the Bowtie Parcel has always been to develop the site into a park with permanent, daily public access and they completed a General Plan in 2005. While final park designs are not complete, the park will be designed in a way that is consistent with State Parks' mission, "To provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation." State Parks recently received money in their budget to complete facilities planning for the 18-acre site. They have selected consultants to work with them and will be conducting community engagement and developing designs over the next year. The DEIR should be updated to include this information about the property and include an analysis of potential impacts to the Bowtie Parcel project goals due to implementation of the Project in this location. Restoration at Bowtie will increase public visitation of the site and provide significant habitat for many species, including migratory birds traveling along the Pacific Flyway.

TNC has been working with State Parks since 2016 to develop a stormwater management and habitat enhancement project on the northern-most end of the Bowtie Parcel. TNC chose the Bowtie as the ideal site for our demonstration project because it is on the Pacific Flyway, within the U.S. Army Corps of Engineers' approved ecosystem restoration feasibility study area, in the flood plain, and it serves as important upland habitat. The site is a protected natural resource and a public amenity. TNC identified numerous wildlife species native to this region, some currently present in the area and some likely to return, that would use the site if restored to suitable habitat. TNC completed conceptual designs (found [here](#)) in 2017 and identified five key habitat types that could be restored at the site: alluvial fan sage scrub, southern sycamore riparian woodland, coastal sage scrub, California walnut woodland, and southern cottonwood-willow riparian forest.

Mitigation

900-1788 | TNC is concerned that determinations on mitigation will be made after the DEIR is finalized. The timing of such actions removes an important component of both NEPA and CEQA, the requirement for public participation in the process. TNC recommends that the mitigation determinations should be made with input and feedback from conservation organizations and local stakeholders with detailed knowledge of the challenges and opportunities present in the project area. As proposed in the DEIR, all the specific mitigation requirements will be determined by regulatory agencies after the public-facing environmental review process has concluded. Similarly, all compensatory mitigation plans will be developed with a lack of transparency that potentially misses out on information that local organizations

900-1788 | can provide and does not seem appropriate for such a large public project in an extremely urbanized area.

TNC suggests that all mitigation requirements and plans should first be developed in consultation with local conservation organizations, community organizations, and public agencies with active plans for conservation and community investment within the Project footprint, then be subject to a public comment period and that all comments should be addressed. Additionally, as noted above, TNC suggests that independent committees with relevant experience should be created to review and approve all mitigation requirements and compensatory mitigation plans to ensure impacts are adequately offset to support the DEIR findings that impacts are less than significant. TNC further suggests that the DEIR include a mitigation measure requiring establishment of an independent committee of local experts in restoration, plant ecology, and native plant propagation to help review and approve all restoration plans.

900-1789 | Finally, TNC questions the assertion that a de minimis impact is an appropriate finding regarding permanent alterations and grading proposed for 0.56 acres of Rio de Los Angeles State Park. Long term impacts to Rio de Los Angeles State Park, including Bowtie Parcel, must be considered and mitigated as this project moves forward.

Changes following release of the DEIR

900-1790 | Given the proposed Project's route directly through these critically important 100 acres of public open space, we urge CHSRA to fully consider the comprehensive planning efforts around the 100 acres, and to work collaboratively with the 100-Acre Partnership to address and mitigate any and all project impacts to the public's current and future access to and enjoyment of the parkland and open space.

900-1791 | In addition, given the high level of uncertainty around future available funding for this Project, we encourage CHSRA to build maximum flexibility into the Burbank to Los Angeles Section to allow for design and engineering improvements to the route as technology advances. This includes all advanced work currently under consideration and development such as improvements to Union Station and grade crossings that will inform future opportunities as well as constraints along this segment. As the reality of high-speed rail along this section could conceivably have a long time horizon, future innovations might allow for advances such as electrifying Metrolink and/or freight, the sharing of electrified tracks, reducing the project's footprint to allow trains to go down into a trench through the 100 acres, and/or improved noise walls to safeguard sensitive receptors. In other words, we urge CHSRA to avoid making planning and engineering decisions now that might preclude innovations in the future that would benefit the environment, the state parks, and/or Los Angeles River restoration efforts without contravening the project's overall purpose and need.

Conclusion

900-1792 | It is our hope that CHSRA will hold additional meetings for stakeholders, including TNC, with presentations followed by question and comment sessions within and outside of the CEQA process. Without better communication it will be hard to collectively work to find solutions to multiple issues that are impacting one of the most important and densely populated geographies in California. We thank you for giving us this opportunity to comment and thank you for your time. We hope to continue to work better together in the future.

Submission 900 (Jill Sourial, The Nature Conservancy in California, August 31, 2020) - Continued

Sincerely,



Jill Sourial,
Urban Conservation Director
The Nature Conservancy in California

cc: Congressmember Adam Schiff
 Congressmember Jimmy Gomez
 State Senator Maria Elena Durazo
 Assemblymember Wendy Carrillo
 Los Angeles County Supervisor Hilda Solis
 Mayor Eric Garcetti, City of Los Angeles
 Mark A. McLoughlin, Director of Environmental Services, California High-Speed Rail Authority

Response to Submission 900 (Jill Sourial, The Nature Conservancy in California, August 31, 2020)

900-1784

The commenter expresses concern regarding the HSR Build Alternative's impacts on the community in the Taylor Yard area and requests that the HSR Build Alternative be designed and built in the least impactful way using the latest science to evaluate and mitigate for impacts. As discussed in Section 5.8 in this Final EIR/EIS, all populations close to the project footprint, including minority and/or low-income populations, would experience impacts as a result of the HSR Build Alternative. The context and intensity of these impacts would be similar for low-income and/or minority populations, as well as non low-income and/or nonminority populations. Additionally, all populations near the project footprint, including low-income and/or minority populations, would also benefit from the HSR Build Alternative as a result of improved regional accessibility, reduced vehicle trips on freeways, improvements to active transportation infrastructure, safety improvements for both pedestrians and bicyclists along the existing rail corridor, a reduction in statewide air quality and GHG emissions, and improved access and safety through grade separation of current at-grade crossings. No revisions to this Final EIR/EIS have been made in response to this comment.

900-1785

The commenter states that an extension of the public comment period would be helpful. In response to agency and stakeholder requests and in consideration of limitations caused by the novel coronavirus pandemic, the Authority elected to extend the initial 45-day public review period for 15 days to July 31, 2020, and then for another 30 days to August 31, 2020. Therefore, the comment period provided was a total of 94 days, which is twice the minimum requirement, pursuant to CEQA and NEPA, of 45 days.

900-1786

The commenter states that better communication and information flow between the Authority and stakeholder organizations could have occurred prior to the release of the Draft EIR/EIS. The Authority acknowledges these concerns. Chapter 9 of this Final EIR/EIS provides an updated list of meetings and stakeholder outreach that has been ongoing for the Burbank to Los Angeles Project Section since 2014. This chapter describes the scoping process, comments received, the public meetings and comments received during the alternatives analysis phase of the project, and also identifies technical reports that evaluated alternatives and project refinements prior to the selection of the HSR Build Alternative evaluated in the Draft EIR/EIS. The Authority also acknowledges the request for additional information and coordination, and will continue to coordinate with The Nature Conservancy and other non-governmental stakeholders.

Response to Submission 900 (Jill Sourial, The Nature Conservancy in California, August 31, 2020) - Continued

900-1787

The commenter requests the inclusion of the G-1 Parcel (Proposed Bowtie Parcel) in the Final EIR/EIS. The Proposed Bowtie Parcel is a proposed park that is publicly owned and would be open to the public. In addition, the proposed park is included as a proposed recreational resource within a master plan. Therefore, this recreational resource is protected under Section 4(f) of the U.S. Department of Transportation Act. An impacts analysis for the Proposed Bowtie Parcel has been added to Chapter 4 of this Final EIR/EIS to assess whether the HSR Project would result in a use of this property under Section 4(f).

The impact analysis concludes that the HSR Build Alternative project footprint would not encroach onto the park property; therefore, the HSR Project would not result in the permanent use or temporary occupancy of the Proposed Bowtie Parcel. The HSR Build Alternative project footprint is located adjacent to this proposed park; therefore, an analysis of indirect noise or visual impacts (proximity impacts) was also added to Chapter 4 to determine whether the HSR Project would result in the constructive use of the proposed park.

In the area adjacent to the Proposed Bowtie Parcel, the existing tracks would be removed and new tracks would be added slightly farther to the east, away from the proposed park property. After HSR Project implementation, HSR trains would run adjacent to the Proposed Bowtie Parcel.

As detailed in the *Burbank to Los Angeles Project Section Noise and Vibration Technical Report* (Authority 2020), the HSR Project would result in a noise increase at Site ST-09 (the closest noise monitoring location to this resource), from an existing level of 62 dBA to 69 dBA after project implementation, which would be a moderate impact. A moderate impact indicates that the introduction of the project will be noticeable to most people, but it may not be sufficient to cause strong reactions from the community. In addition, during operation, visual elements introduced within the rail corridor would include the trains, overhead contact system (OCS), lighting, and signage. The proposed elements near the Proposed Bowtie Parcel would be consistent with the existing railroad corridor, and the HSR Project would not introduce any vertical elements that would be visually intrusive to users of the park. Therefore, proximity impacts would not substantially impair the activities, features, or attributes of the property.

900-1787

For the reasons stated above, the HSR Build Alternative would not result in a Section 4(f) use of the Proposed Bowtie Parcel. Chapter 4 of this Final EIR/EIS has been revised to include this discussion.

900-1788

The commenter is concerned that mitigation determinations will be made without input and feedback from conservation organizations and local stakeholders, an important component of both NEPA and CEQA. The mitigation measures presented in this Final EIR/EIS contain as much detail as possible at this stage of project design. The Authority is committed to working with local stakeholders and conservation agencies during the final design of applicable mitigation measures. Mitigation measures identified by regulatory agencies as part of the permitting process after the CEQA and NEPA processes have completed will be evaluated to determine whether additional environmental review is necessary.

The commenter also suggests that independent committees with relevant experience should be created to review and approve all mitigation requirements and compensatory mitigation plans to ensure impacts are adequately offset to support the Draft EIR findings that impacts are less than significant. The commenter further suggests that the Draft EIR include a mitigation measure requiring establishment of an independent committee of local experts in restoration, plant ecology, and native plant propagation to help review and approve all restoration plans. As stated above, mitigation measures to offset impacts to regulated resources will be coordinated with the agencies of jurisdiction. The review of mitigation measures by conservation agencies and stakeholders beyond what is included in the Final EIR/EIS is not required under CEQA or NEPA.

Response to Submission 900 (Jill Sourial, The Nature Conservancy in California, August 31, 2020) - Continued

900-1789

The commenter expresses concern regarding the *de minimis* finding for impacts to Rio de Los Angeles State Park and requests the inclusion of the Proposed Bowtie Parcel in the analysis. In the Draft EIR/EIS, the Authority made a preliminary determination that the HSR Project would not adversely affect the activities, features, or attributes that qualify Rio de Los Angeles State Park for protection under Section 4(f); therefore, the HSR Build Alternative was preliminarily determined to result in a *de minimis* impact on this resource. The preliminary *de minimis* impact determination was based on consideration of both direct effects (grading of an existing vegetated slope outside the park's fence line) and indirect effects, which would include a moderate noise impact (noticeable to most people, but not sufficient to cause strong reactions from the community) and neutral effects on visual quality (a moderate visual change that would be compatible with the existing environment). In addition, the preliminary *de minimis* impact determination was based on the implementation of measures to minimize harm to address access, air quality, noise, and visual impacts, including PK-IAMF#1, TR-IAMF#2, TR-IAMF#4, TR-IAMF#5, AQ-IAMF#1, N&V-IAMF#1, AVQ-IAMF#1, AVQ-IAMF#2, PR-MM#1, PR-MM#2, N&V-MM#1, and AVQ-MM#1. The Authority has consulted with the California Department of Parks and Recreation to obtain their concurrence on the *de minimis* impact determination that the project would not adversely affect the activities, features, or attributes that qualify the resource for protection under Section 4(f).

During a Section 4(f) consultation meeting on June 26, 2020, the Authority initiated a discussion with the California Department of Parks and Recreation regarding the HSR Project's impacts on Rio de Los Angeles State Park. The California Department of Parks and Recreation communicated that the portion of Rio de Los Angeles State Park that would be affected by the HSR Project is adjacent to a soccer field, and to the City of Los Angeles has been considering extending the soccer field onto the area that would be re-graded as part of the HSR Build Alternative. The discussion in Table 3.15-6 has been revised in this Final EIR/EIS to replace the words "acquisition" and "incorporation" with "modifications" to clarify the impact to Rio de Los Angeles State Park described in Impact PK #3, which states: "Construction of the HSR Build Alternative would require permanent modifications to 0.56 acre of land along the southern boundary of the park. The existing access road would be lowered adjacent to the park, which would require grading of the existing vegetated slope within the park boundary."

900-1789

In addition, refer to response to comment 900-1787, contained in this chapter, for a discussion on the inclusion of the Proposed Bowtie Parcel in this Final EIR/EIS.

Response to Submission 900 (Jill Sourial, The Nature Conservancy in California, August 31, 2020) - Continued

900-1790

The commenter expresses concern that the alignment would impact current and future access to 100 acres of public open space and parkland, specifically in the 100-Acre Partnership area along the Los Angeles River. In response to the first part of the comment which states “Given the proposed Project’s route directly through these critically important 100 acres of public open space”, it should be noted that the HSR project would build new infrastructure within an existing railroad corridor that already goes directly through the 100-Acre Partnership area. Section 3.15 of this Final EIR/EIS has been revised to include a discussion of the G1 Parcel (Bowtie Parcel). Therefore, all existing and planned parks within the RSA are analyzed in the impact analysis in Section 3.15.6.3 of this Final EIR/EIS. As connectivity between Rio de Los Angeles State Park and Taylor Yard is identified within the LARRMP (City of Los Angeles 2007), impacts to future planned connections are addressed in Section 3.15.3. Section 3.15.3 of this Final EIR/EIS has been revised to state: “The HSR Build Alternative would not result in a loss of parkland but may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreational experience as identified in the LARRMP under objectives related to the Taylor Yard Opportunity Area.”

However, through implementation of PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would provide alternative routes for the acquisition of existing or planned bicycle routes. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity. Therefore, the HSR Build Alternative is consistent overall with the applicable local plans, goals, and policies.

900-1791

Refer to Standard Response BLA-Response-Chapter 2 Alt-01: Alternatives.

The commenter encourages the Authority to avoid making planning and engineering decisions now that might preclude innovations in the future that would benefit the environment, the state park, and/or Los Angeles River restoration efforts without contravening the project’s overall purpose and need. The HSR alignment evaluated in this Final EIR/EIS has been refined through the Tier 1 and Tier 2 analyses to avoid impacts on important existing and planned resources to the extent feasible while also meeting overall project objectives, as discussed in more detail in BLA-Response-Chapter 2 Alt-01: Alternatives. Since, at this phase, the HSR Build Alternative is at 15% design, the alignment is as flexible as the environmental constraints will allow.

Therefore, the HSR Build Alternative does not preclude innovations in the future that would benefit the environment.

900-1792

The commenter requests additional meetings held for stakeholders, including The Nature Conservancy, within and outside of the CEQA process. The Authority acknowledges this request and will continue to coordinate with The Nature Conservancy and other non-government stakeholders through the completion of the environmental review process, final design, and construction.

Submission 686 (Katharine Mullen, The Stronghold Climbing Gym, July 13, 2020)

Burbank - Los Angeles - RECORD #686 DETAIL

Status : Action Pending
Record Date : 7/13/2020
Submission Date : 7/13/2020
Interest As : Business and/or Organization
First Name : Katharine
Last Name : Mullen

Stakeholder Comments/Issues :

Dear Diane Richard or Whom It May Concern of the California High-Speed Rail Authority,

686-709

I am writing to request that you extend the time for public comment on the California High Speed Rail Authority's Burbank to Los Angeles Project Section, Draft EIR/EIS. i.e., the Main Street Overpass (Lincoln Heights), because many of us in the Lincoln Heights community have not been able to submit a comment or study the EIR, given the difficulties imposed by the pandemic.

Thank you and best wishes,
Kate Mullen
Co-Owner, The Stronghold Climbing Gym, Lincoln Heights

--

The Stronghold Climbing Gym
650 South Avenue 21, Los Angeles, CA 90031
323-505-7000
strongholdclimb.com

Response to Submission 686 (Katharine Mullen, The Stronghold Climbing Gym, July 13, 2020)

686-709

The commenter requests an extension of the public comment period. In response to agency and stakeholder requests and in consideration of limitations caused by the novel coronavirus pandemic, the Authority elected to extend the initial 45-day public review period for 15 days to July 31, 2020, and then for another 30 days to August 31, 2020.

Therefore, the comment period provided was a total of 94 days, which is twice the minimum requirement, pursuant to CEQA and NEPA, of 45 days.

Submission 758 (Deanna Detchemendy, The Walt Disney Company, July 30, 2020)

Burbank - Los Angeles - RECORD #758 DETAIL	
Status :	Action Pending
Record Date :	7/30/2020
Submission Date :	7/30/2020
Interest As :	Business and/or Organization
First Name :	Deanna
Last Name :	Detchemendy
Attachments :	2020 07-30 Disney HSR BUR-LA Comment LTR.pdf (580 kb)

Stakeholder Comments/Issues :

Please see the attached comment letter; original to follow by U.S. Mail.

Best regards,
Deanna Detchemendy

Deanna W. Detchemendy
Assistant General Counsel
The Walt Disney Company
500 South Buena Vista Street
Burbank, CA 91521
(818) 599-1088 (cell)
(818) 560-8952 (office)

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July 30, 2020

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

Dear Ladies/Gentlemen:

Walt Disney Parks and Resorts U.S., Inc. ("Disney") owns approximately 125 acres of land in the City of Glendale, situated south of and in many cases immediately adjacent to the proposed route for the California High-Speed Rail (HSR) between Western Avenue and Flower Street. This complex is commonly referred to as Disney's Grand Central Creative Campus ("GC3").

Disney has reviewed the May 2020 draft of the HSR Authority's Burbank to Los Angeles Section Draft Environmental Impact Report/Environmental Impact Statement ("EIR" for the "Proposed HSR Segment"). We appreciate the Authority's efforts to strike the appropriate balance between achieving the benefits anticipated from the overall HSR project—and the Proposed HSR Segment in particular—and protecting the environment in the areas anticipated to be impacted.

758-1155

Of particular interest to Disney is the EIR's analysis relating to noise, vibration, and electromagnetic fields and interference ("EMF"). The Authority should be aware that several of Disney's GC3 operations along the proposed HSR route involve recording studios and other uses reliant on technical equipment that is sensitive to disruption caused by excessive noise, vibration and/or EMF. As the Proposed HSR Segment approaches a more detailed design phase, we ask that the Authority contact Disney to collaborate on design and construction scheduling solutions to mitigate potential interference with sensitive elements of GC3 operations.


758-1156

Disney looks forward to working collaboratively with the Authority on these issues as well as the temporary construction easements and related access needs highlighted in the EIR. In addition, we encourage the Authority to work with Disney to ensure the effective communication to our many GC3 Cast Members about the timing and impact of HSR construction when the time approaches.

758-1157

Yours very truly,

WALT DISNEY PARKS AND RESORTS U.S., INC.

By: 
Deanna Detchemendy, Vice President

500 South Buena Vista St., Burbank, CA 91521

-- Disney

Response to Submission 758 (Deanna Detchemendy, The Walt Disney Company, July 30, 2020)

758-1155

The commenter expresses concern regarding potential impacts from noise, vibration, and EMI/EMF to Disney's GC3 operations. The Disney studio locations cited in this comment were included in the vibration and ground-borne noise assessment for the project. The sites were treated as more sensitive with stricter criteria for impact, as shown in Table 3.4-11 of this Final EIR/EIS. Because an impact was identified at the DisneyToon Studios, mitigation has been recommended. Specifically, N&V-MM4 through N&V-MM#6 will be incorporated to ensure that impacts to the Disney studios will be reduced to less than significant. EMI/EMF impacts are addressed in Section 3.5.6 of this Final EIR/EIS. Potential EMI/EMF effects were evaluated throughout the corridor that includes the Disney campus. Impacts, including interference from radio communications and magnetic field effects from the traction power system were found to be less than significant. No changes have been made to the Final EIR/EIS in response to this comment.

758-1156

The commenter requests that the Authority collaborate with Walt Disney Parks and Resorts U.S., Inc. ("Disney") on design and construction scheduling solutions to mitigate potential impacts. The Authority will continue to work with area stakeholders, including Disney, as the project progresses through final design and construction.

758-1157

The commenter looks forward to further collaboration with Disney on several issues, including communications on the timing of construction. The Authority likewise appreciates Disney's partnership and also looks forward to future coordination efforts

Submission 694 (Christopher Fetner, TY - 55 Home Owners Association, July 20, 2020)

Burbank - Los Angeles - RECORD #694 DETAIL

Status : Action Pending
Record Date : 7/20/2020
Submission Date : 7/20/2020
Interest As : Business and/or Organization
First Name : Christopher
Last Name : Fetner

Stakeholder Comments/Issues :

694-778

The noise impact studies seem to be unrealistic given this is considered moderate, but doesn't account for the movement of the track closer to our development.

Response to Submission 694 (Christopher Fetner, TY - 55 Home Owners Association, July 20, 2020)

694-778

The noise analysis presented in this Final EIR/EIS and supporting Burbank to Los Angeles Project Section Noise and Vibration Technical Report (Authority2020) does account for the shift in Metrolink and Union Pacific Railroad (UPRR) tracks near the Taylor Yard residences closer to the existing homes. While a noise source moving closer to sensitive receptors has the inherent potential to increase noise levels at a specific location, the proposed trackwork was designed to have the potential to reduce noise levels overall. Typically, on train tracks near maintenance areas, trackwork such as switches and crossovers have the potential to elevate noise levels due to the wheels from the trains passing over a non-continuous portion of track. For this project, the number of switches in the area close to the Taylor Yard residences is being reduced from three to two. The existing crossover provided for movements between tracks at higher speeds and the existing left-hand turnout allowed movements to a siding track at similar speeds. However, this siding track (Glendale Slide) has since been relocated north between State Route (SR) 134 and Chevy Chase Boulevard on the east side of the corridor, so the Taylor Yard community would not be exposed to noise from this siding track (refer to the updated plans provided in Volume 3 of this Final EIR/EIS). Additionally, based on the proposed design, the existing UPRR trains would no longer use turnouts in this area, so there would no longer be noise exposure from UPRR trains. The discussion under Impact N&V #4 and Impact N&V #5 have been updated in Section 3.4.6 of this Final EIR/EIS to reflect the design changes described above.

Submission 902 (Adrian Guerrero, Union Pacific Railroad Company (UPRR), August 31, 2020)

Burbank - Los Angeles - RECORD #902 DETAIL

Status : Action Pending
Record Date : 9/3/2020
Submission Date : 8/31/2020
Interest As : Business and/or Organization
First Name : Adrian
Last Name : Guerrero



August 31, 2020

Attn: Draft Burbank to Los Angeles Project Section EIR/EIS
California High Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

To Whom It May Concern:

Union Pacific Railroad Company (UPRR) submits these comments in response to the California High-Speed Rail Authority's (CHSRA) Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS): Burbank to Los Angeles Project Section.

UPRR owns and operates a common carrier freight railroad network in the western two thirds of the United States, including the State of California. Specifically, UPRR owns and operates rail main lines connecting the San Francisco Bay Area to Sacramento and points east and north, and to Los Angeles and points east and southeast. UPRR is the largest rail carrier in California in terms of both mileage and train operations. UPRR also has a multitude of public private partnerships across the state, including active and planned projects with various state agencies and passenger rail partners. UPRR's network in California is vital to the economic health of the state and the nation as a whole, and its rail service to California customers is crucial to the current and future success and growth of those customers.

UPRR has been actively engaged in discussions with CHSRA for many years in order to ensure that the safety and efficiency of the UPRR system, including UPRR's ability to serve current and future customers, is preserved during the planning, construction, and operation of the California high-speed rail project. UPRR and CHSRA have entered into several agreements that reflect these interests, including the Memorandum of Understanding and Implementing Agreement Related to High-Speed Rail Development in California dated July 11, 2012 (MOU) and the Engineering, Construction, and Maintenance Agreement Related to the California High-Speed Rail Authority Project Merced to Bakersfield Segment dated December 23, 2014.

UPRR has also submitted formal comments in response to proposals at several points during the environmental permitting process for various aspects of the high-speed rail project. That communication has included comments on plans for the proposed Fresno

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Submission 902 (Adrian Guerrero, Union Pacific Railroad Company (UPRR), August 31, 2020) - Continued

to Bakersfield high-speed rail segment, the Downtown Bakersfield High-Speed Rail Station Area Plan, and the recent DEIR/DEIS submittals for the Bakersfield to Palmdale high-speed rail segment, and San Jose to Merced project segment.

CHSRA's Burbank to Los Angeles DEIR/DEIS proposes a Preferred Alternative (HSR Build Alternative) alignment that seeks to share track by utilizing much of an existing railroad right-of-way, resulting in a blended system and operations. The Preferred Alternative alignment touches a complex mix of UPRR owned right-of-way, in addition to corridors where UPRR retains and exercises its freight operating rights. These corridors host UPRR premium freight service along with several freight rail served customers and facility infrastructure.

A shared corridor concept raises several operating, engineering, real estate and commercial franchise challenges through these corridors. Except where UPRR has, following negotiation with CHSRA, implemented significant capacity improvements and other mitigation measures to address adverse impacts to its franchise, UPRR will not allow any part of the high-speed rail system to be located on UPRR-owned property or diminish UPRR operating rights. For these reasons CHSRA must develop viable alternatives that protect for freight, as the Preferred Alternative shown here is not acceptable to UPRR.

With these general principles as context, UPRR offers these specific points:

902-1793

- In this congested corridor, existing track should not be converted to the blended system. New right-of-way acquired and new track must be built to preserve existing & future capacity (including currently unused right-of-way). CHSRA must acquire the requisite property to preserve this capacity. As shown in Table 2-8, capacity projects have already been planned for the existing right-of-way. It is absolutely necessary to protect commuter and freight traffic growth, and the Preferred Alternative directly conflicts with these projects.

902-1794

- Proposals to remove spur tracks or otherwise degrade the freight capability network are not acceptable. An aerial or underground corridor could be considered as it was for the section through Burbank Airport.

902-1795

- Any new facilities that cross UPRR's right of way in relation to the project, including new or realigned roads, must be grade-separated and comply with UPRR's then-current minimum engineering standards.

902-1796

- Depending on the design and proximity of the CHRSA facilities to the UPRR right of way, special conditions such as safety barriers may be required.

902-1797

- The Burbank Junction Wye must remain intact, fully accessible and operational.

902-1798

- Figure 2-34 – Relocating pedestrian access and new CHSRA tracks which interfere with an existing freight spur is not acceptable.

902-1799

- Figure 2-27 – Three mainline tracks must be maintained around the Metrolink Central Maintenance Facility. CHSRA must not realign the existing main tracks and consolidate down to two tracks.

902-1800

- Diverting Metrolink/ Surfliner trains to the East Bank Line to make room for CHSRA trains on the West Bank Line must contemplate capacity mitigations. Routing all traffic to the East Bank Line between Dayton and East Diamond will push this segment into capacity overload. If CHSRA is to assume control and operations of the West Bank, capacity improvements must be made to the East Bank Line to preserve existing and future capacity.

902-1801

- Section 2.5.2.8 – UPRR will not accept closure or removal of tracks regardless of whether there is an active customer currently situated on that track. Table 2-14's reference to removing these tracks is not an option.

902-1802

- Table 2-15 and also described in section 2.5.2.9 – There are many new and modified bridges to be constructed as a result of accommodating the Preferred Alternative. CHSRA must share in the maintenance of existing and new structures.

902-1803

- Clearances – CHSRA cannot further constrain the existing clearances on tracks any realignment must preserve or enhance existing clearances.

902-1804

- To comply with the terms of the MOU, CHSRA must design its alignment in a manner that does not interfere with UPRR's access to current or future customers. Section 2(A)(2) of the MOU says CHSRA "will take all steps available under law to avoid impeding UPRR's commercially reasonable access to current and potential customers and the access of current and potential customers to UPRR along the corridor." Drawings for the Preferred Alternative from Burbank to Los Angeles depict the CHSRA alignment realigning UPRR track infrastructure and right of way in various segments, thereby impacting existing UPRR spur tracks and facilities owned or operated by current UPRR customers.

Submission 902 (Adrian Guerrero, Union Pacific Railroad Company (UPRR), August 31, 2020) - Continued

902-1804

The proposed alignment also appears to separate UPRR from developable property adjacent to the UPRR main line at various points along the proposed route. Impacts to existing and future freight rail customers associated with the proposed Preferred Alternative alignment are unacceptable. UPRR will require modification of the route per the terms of the MOU so that there are no impacts to our ability to serve existing or future customers.

902-1805

- It is not clear whether the DEIR/DEIS has examined the impact that construction of the CHSRA alignment may have on the future ability of cities or other road authorities to grade-separate roads that cross the UPRR tracks along the route. State and federal policies encourage the elimination of railroad grade crossings for the benefit of safety and the efficient movement of trains and vehicular traffic. The design of the CHSRA alignment and its proximity to the UPRR right of way under the Preferred Alternative may permanently prevent roads that currently cross the freight tracks at grade from being grade-separated in the future. UPRR requests that an analysis be completed to determine the extent of these potential impacts and that the results be formally communicated to the respective roadway authorities who might be impacted and to UPRR.

902-1806

Considering the potentially serious and detrimental impacts to UPRR facilities, operations, current and future customer access, and to long-term roadway accessibility over UPRR tracks along the Preferred Alternative route, UPRR encourages CHSRA to continue working with UPRR to develop an alignment that meets UPRR safety and engineering guidelines, addresses the concerns identified in this letter or that have yet to be identified, and meet the obligations outlined in our standing agreements. If CHSRA does select the Preferred Alternative route, then CHSRA must mitigate any and all impacts to UP and our customers. CHSRA must provide solutions to overcome the impacts to UPRR noted above and any others UPRR identifies as the design of the Preferred Alternative route is developed in more detail.

Thank you for considering our comments.

Sincerely,



Adrian Guerrero
General Director Network Development

Response to Submission 902 (Adrian Guerrero, Union Pacific Railroad Company (UPRR), August 31, 2020)

902-1793

The commenter states that new rail right-of-way acquired and new track must be built to preserve existing and future capacity. Throughout most of the project section (between Alameda Avenue and SR 110), two new electrified tracks would be placed along the west side of the existing railroad right-of-way; the two new electrified tracks would be usable for HSR and other passenger rail operators. The additional capacity of the new electrified tracks, combined with the capacity of the two existing non-electrified tracks, will be sufficient to accommodate the rail traffic volumes specified in Table 2-7 of this EIR/EIS. Between SR 110 and Los Angeles Union Station, signaling system improvements will allow trains to operate at higher frequencies, thereby accommodating all train operators in the shared corridor with no reductions in capacity, travel time, or speeds. Prior to the start of high-speed rail operations between Burbank and Los Angeles, the Authority will work with other operators in the rail corridor to establish necessary shared use agreements pertaining to operating slots and timetables, train control and communications, maintenance of equipment and infrastructure, station and train cleaning, and emergency response.

902-1794

The commenter states that proposals to remove spur tracks are not acceptable. As described in Section 2.5.2.8, with the exception of the wye connection in Burbank, all other spur tracks are proposed to be realigned or relocated. No revisions were made to this Final EIR/S.

902-1795

The commenter states that any new facilities that cross UPRR's right-of-way in relation to the project, including new or realigned roads, must be grade-separated and comply with UPRR's then-current minimum engineering standards. All new facilities crossing UPRR right-of-way as part of this project are proposed to be grade separated and to meet the operator's standards and criteria.

902-1796

The commenter states that depending on the design and proximity of the HSR facilities to the UPRR right-of-way, special conditions such as safety barriers may be required. According to the FRA guideline, "High-Speed Passenger Rail, Safety Strategy, Version 1.0", Appendix A and B, dated November 2009, speeds less than 110 miles per hour do not require barriers. HSR trains in the Burbank to Los Angeles Project Section and adjacent to UPRR would have a maximum speed of 110 mph or less. Therefore, special conditions, such as safety barriers, would not be required.

902-1797

The commenter states that the Burbank Junction Wye must remain intact, fully accessible and operational. However, there are not feasible concepts for the CHSRA tracks to avoid impacts to the freight spurs and Burbank Junction Wye in this area. The Authority will continue to coordinate with the UPRR on methods to replace the functionality of these freight facilities.

902-1798

The commenter states that the relocated pedestrian access and new HSR tracks that would interfere with an existing freight spur is not acceptable. Pedestrian crossings at the Burbank Downtown Metrolink Station to be relocated as part of the Project are designed to be grade separated and not to conflict with freight spurs. As discussed in Response 1797, there are not feasible concepts for the CHSRA tracks to avoid impacts to the freight spur and Burbank Junction Wye in this area. The Authority will continue to coordinate with the UPRR on methods to replace the functionality of these freight facilities.

Response to Submission 902 (Adrian Guerrero, Union Pacific Railroad Company (UPRR), August 31, 2020) - Continued

902-1799

The commenter states that three mainline tracks must be maintained around the Metrolink CMF. Throughout most of the project section (between Alameda Avenue and SR 110), two new electrified tracks would be placed along the west side of the existing railroad right-of-way; the two new electrified tracks would be usable for HSR and other passenger rail operators. The additional capacity of the new electrified tracks, combined with the capacity of the two existing non-electrified tracks, will be sufficient to accommodate the rail traffic volumes specified in Table 2-7 of this EIR/EIS. Between SR 110 and Los Angeles Union Station, signaling system improvements will allow trains to operate at higher frequencies, thereby accommodating all train operators in the shared corridor with no reductions in capacity, travel time, or speeds. Prior to the start of high-speed rail operations between Burbank and Los Angeles, the Authority will work with other operators in the rail corridor to establish necessary shared use agreements pertaining to operating slots and timetables, train control and communications, maintenance of equipment and infrastructure, station and train cleaning, and emergency response.

902-1800

The commenter states that capacity improvements must be made to the East Bank Line to preserve existing and future capacity. Refer to Response to Comment 902-1793 in this chapter of the Final EIR/EIS regarding preservation of existing and future rail capacity.

902-1801

The commenter states that UPRR will not accept closure or removal of tracks regardless of whether there is an active customer currently situated on that track. Throughout most of the project section (between Alameda Avenue and SR 110), two new electrified tracks would be placed along the west side of the existing railroad right-of-way; the two new electrified tracks would be usable for HSR and other passenger rail operators. As described in Section 2.5.2.8, with the exception of the wye connection in Burbank, all other spur tracks are proposed to be realigned or relocated. No revisions were made to this Final EIR/S. There are not feasible concepts for the CHSRA tracks to avoid impacts to the freight spurs and Burbank Junction Wye in this area. However, the Authority will continue to coordinate with the UPRR on methods to replace the functionality of these freight facilities.

902-1802

The commenter states that the Authority must share in the maintenance of existing and new structures. The Authority will run as a tenant railroad within the corridor under agreement with the existing operators and will be responsible for their share of the cost for maintenance and operations. The Authority will enter into a construction operations and maintenance agreement with the owner of the corridor prior to construction. The maintenance agreement will set forth the responsibilities of all parties.

902-1803

The commenter states that the Authority cannot further constrain the existing clearances on tracks and that any realignment must preserve or enhance existing clearances. The HSR Build Alternative complies with UPRR design standards to the extent feasible. The HSR Build Alternative satisfies mandatory horizontal and vertical clearance to proposed track geometry throughout the corridor except where ROW is constrained. The Authority will continue to work with the UPRR through subsequent design stages to ensure that the final design for the project meets the needs of all operators in the corridor.

902-1804

The commenter states that to comply with the terms of the Memorandum of Understanding, the Authority must design its alignment in a manner that does not interfere with UPRR's access to current or future customers. The Authority has made numerous attempts to coordinate with the UPRR which have been unsuccessful. The high speed rail alignment makes every effort to protect the UPRR's existing and future customers. The EIR/EIS includes the relocation policy (12-B in Volume 2 of this EIR/EIS) that provides the procedure for how the Authority will work with the UPRR and other stakeholders to address property impacts from the HSR Build Alternative.

Response to Submission 902 (Adrian Guerrero, Union Pacific Railroad Company (UPRR), August 31, 2020) - Continued

902-1805

The commenter states that the design of the HSR Build Alternative may permanently prevent roads that currently cross the freight tracks at-grade from being grade separated in the future. As described in Section 2.5.2.2, the only area within the Burbank to Los Angeles Project Section that would continue to cross the freight tracks at-grade is Buena Vista Street in Burbank. The HSR Build Alternative would not permanently prevent a grade-separation in this location, the design would only preclude a grade separation design with the roadway depressed under railroad tracks located at the current elevation. A future grade separation of Buena Vista Street could be built with the roadway going over the railroad tracks, or the remaining railroad tracks at the crossing going over or under the roadway.

902-1806

The commenter recognizes the ongoing coordination with the Authority and identifies UPRR safety and engineering guidelines, the concerns raised in this comment letter, and obligations provided for in existing agreements as areas that will benefit from continued coordination. The Authority is committed to continued work with UPRR regarding these issues and the design of the HSR Build Alternative.

The commenter also states that if the Authority constructs the HSR Build Alternative, any and all impacts to UPRR and its customers must be mitigated. The Authority is committed to implementing the mitigation measures described in the MMRP and MMEP that will incorporate all mitigation measures in this Final EIR/EIS.