Submission 782 (Michael Dillenbeck, Kern County Public Works Department, April 30, 2020)

Bakersfield - Palmdale - RECORD #782 DETAIL

Status :	Action Pending
Record Date :	4/30/2020
Affiliation Type :	Local Agency
Submission Date :	4/30/2020
Interest As :	Local Agency
Submission Method :	Project Email
First Name :	Michael
Last Name :	Dillenbeck
Professional Title :	Public Works Manager
Business/Organization :	Kern County Public Works Department
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Email Subscription :	
Add to Mailing List :	
EIR/EIS Comment :	Yes
Attachments :	2020-04-28 Kern County Public Works.pdf (7 mb)

Stakeholder Comments/Issues :

Please see the attached comment letter from the Kern County Public Works Department on the Bakersfield to Palmdale DEIR/EIS. A copy has been mailed to:

Attn: Draft EIR/EIS for the Bakersfield to Palmdale Project Section
California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

Michael Dillenbeck
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Attn: Draft EIR/EIS for the Bakersfield to Palmdale Project Section
California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

RE: Comments on Draft EIR/EIS for HSR Bakersfield to Palmdale Project Section

Authority,

The Kern County Public Works Department (Department) has reviewed the Draft Environmental Impact Report/Statement (DEIR/DEIS) for the Bakersfield to Palmdale segment of the California High Speed Rail Project (Project). The Department is the responsible agency over County roads in the unincorporated areas of Kern County. As a responsible agency, the Department may be required to accept and relinquish roads, easements, and other transportation related facilities to the California High Speed Rail Authority (Authority). Additionally, all work within the County's right of way is required to obtain an encroachment permit prior to the start of any Project activity within said right of way.

782-652

782-653

782-654 The Department feels that the scale and complexity of the Draft Environmental Impact Report is such that the County cannot adequately advise the Authority on what issues it may encounter while working within the Department's jurisdiction. Specifically, this includes road closures and realignments that may not be approved or agreed to by the Department as well as design alignments, construction plans, detours, and traffic control. The Department's review of these aspects of the project may require the Authority to make scope changes that are not included within this Document. Specifically, the Department will not accept the environmental footprint established by this document as a design constraint for County facilities.

782-655 Therefore, the Department recommends the Authority prepare more regionally specific supplemental DEIRs for the three regions the project is traversing: valley, mountains, and desert. This will allow the responsible agencies, almost all of which are divided by the Sierras, the ability to adequately evaluate and respond to request for comments on the Draft

782-656 Environmental Impact Reports. The Department is also requesting the Authority provide it with a GIS shapefile of the proposed plans included within the Document and on the Authority's website for this segment.

As a responsible agency, the Department offers the following comments:

782-657

Transportation

- **Section 3.2.2.3 – Regional Transportation Plans and Programs:** The Kern Council of Governments, in partnership with the Department and other local jurisdictions, prepared and published the Kern Regional Active Transportation Plan in 2017. Through an extensive review of existing conditions and comprehensive community and stakeholder outreach, the Plan establishes a regional vision complemented by stand-alone

Submission 782 (Michael Dillenbeck, Kern County Public Works Department, April 30, 2020) - Continued

782-657 recommendations for each jurisdiction and unincorporated area, culminating in a prioritization of needed active transportation, non-motorized infrastructure improvements. Please evaluate the project's compatibility with this plan and identify and discuss how the proposed Project would assist KCOG and its member agencies in meeting the Plan's goals. The Plan can be found at: www.kerncog.org/bicycle-plans.

782-658 • **Section 3.2.2.3 – Regional Transportation Plans and Programs:** The Kern Council of Governments, in partnership with the Department and other local jurisdictions, prepared and published the Kern County Grade Separation Prioritization Report in 2011. This report analyzed County rail-highway grade crossings to prioritize projects that would provide the greatest benefit to traffic improvements, freight and passenger train movement, and safety. The County requests the DEIR include a discussion of this document and the Project's compatibility with the report, including how it will meet the goals and priorities established in the Plan. The Plan can be found at: http://www.kerncog.org/wp-content/uploads/2017/11/Grade_Sep_Priority_Report.pdf.

782-659 • **Section 3.2.4.2 – Impact Avoidance and Minimization Features: TR-IAMF #2:** The Department is the responsible agency for monitoring construction within the County's right of way. A copy of the Construction Transportation Plan must be submitted to the Kern County Public Works Finance and Engineering Division for review and approval prior to any work occurring within County right of way on this segment. The Department requests the Authority modify the language in this section to require review and approval of both the Authority and the responsible agencies with jurisdiction over the roadways within the Project area.

782-660 • **Section 3.2.4.2 – Impact Avoidance and Minimization Features: TR-IAMF #4-5, 12:** The Department is the responsible agency for monitoring construction within the County's right of way. The safety of non-vehicular/non-motorized users of the County's right of way is a priority of the Department. As such, a copy of the Technical Memorandum to Protect Pedestrians and Cyclists must be submitted to the Kern County Public Works – Finance and Engineering Division for review and approval prior to any work occurring within County right of way on this segment. The Department requests the Authority modify the language in this section to require review and approval of both the Authority and the responsible agencies with jurisdiction over the roadways within the Project area.

782-661 • **Section 3.2.4.2 – Impact Avoidance and Minimization Features: TR-IAMF #6:** The Restrictions on Construction Hours cites that construction delivery should be limited between 7-9 a.m. and 4-6 p.m. on weekdays. These times should be *excluded* from construction delivery, rather than limited to. These are peak hours, and minimal construction traffic should occur during these peak hours.

782-662 • **Section 3.2.4.3 – Study Assumptions and Baselines for Transportation Impact Analysis:** Existing traffic scenario should be year 2020. Future traffic should be evaluated for 2042 to align with the Kern Council of Governments (KCOG) Model.

782-663 • **Section 3.2.4.6 - Method for Evaluating Impacts under NEPA:** Signalized and Unsignalized intersections within the Metropolitan Bakersfield area should operate at Level of Service (LOS) "C" or better. Please refer to the Metropolitan Bakersfield General Plan Circulation Element, available here: https://kernplanning.com/planning/planning-documents/general-plans-elements/.

782-664 • **Section 3.2.6.3 – Bakersfield to Palmdale Project Section Build Alternatives:** Under the subsection entitled "Impact TR #1: Temporary Road Closures During Construction," the following revisions should be made to the section below:

> *In rural areas, the primary traffic impacts during construction would occur at locations where overcrossings are needed to carry minor roadways over the tracks. At these locations, the affected roadway would either be rerouted onto a temporary alignment or temporarily closed. Temporary closures would be viable if traffic volumes on the affected roadway were very low and a detour route was available that did not require an extraordinary amount of additional travel (e.g., more than 10 miles in rural areas). Detours would be limited and would affect few travelers due to the low traffic volume on the local roads. The duration of the temporary construction impacts could range from a few weeks, with the construction impacts of a grade separation over the highway, to several months. The preliminary description of construction activities provided in the Constructability Assessment Report would be refined by the construction contractor during final project design (TR-IAMF#2).*

The County will not accept a 10-mile detour. A more fitting detour should add no more than 2 miles to the route. Additionally, a several month closures are not acceptable. An alternative to long distance detours and long closures must be provided and analyzed within the DEIR.

782-665 **Hydrology and Water Resources**

• **Section:** The Project does not address drainage systems at the proposed separation of grade locations for new roadway underpasses in Table 3.8-17: Proposed Drainage System. The County requires gravity fed drainage features for any portions of the project it will accept into the County's maintained mileage. This includes facilities associated with any separation of grade locations. The Department requests the Project ensure its scope and area of potential effect is large enough to ensure there is sufficient capacity to handle stormwater via gravity fed structures.

782-666 **Environmental Justice**

• **Section 5.5.2.2 – Enhancement Measures:** The Project proposes in this section to include sidewalks, bike paths, lighting and landscaping to minimize effects on low-income and minority populations. The proposed Project should include a thorough discussion of the maintenance cost of these facilities and how that will impact the local jurisdictions and populations that may be responsible for the maintenance and costs of these facilities and improvements.

782-667 **Mitigation**

• **SO-MM#2:** The DEIR proposes to defer mitigation that would address the impacts caused by the Project separating communities within the alignment and traveling through residential areas. The County requests the Authority both analyze the impacts and costs of the potential improvements underneath the Project and include these improvements and mitigations in the Project.

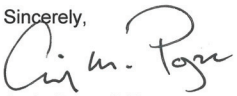
782-668 No portion of the County's comments shall constitute approval of the alignment, scope, scale, or any other aspect of the project by the County. As the responsible agency over

Submission 782 (Michael Dillenbeck, Kern County Public Works Department, April 30, 2020) - Continued

782-668 right of way in the unincorporated areas of Kern County, the Department does not feel the DEIR/EIS provides enough clarity or simplicity to analyze the Project's impact to the public transportation system. All encroachments into the County's right of way will require approval of the design plans and a permit from this Department. The County anticipates significant changes to the project design and alignment to meet its safety and development standards. These changes may result in significant alterations to the alignment and design of the project that could require amendments and/or recirculation of the Project's EIR/EIS.

782-669 Therefore, in addition to the afore mentioned comments, the Department reserves its right to future comments and recommends the Authority rescope the document to be more regionally specific.

Sincerely,



Craig Pope, P.E.
Director

Response to Submission 782 (Michael Dillenbeck, Kern County Public Works Department, April 30, 2020)

782-652

The Authority acknowledges the role of the Kern County Public Works Department as the responsible agency for roads in the unincorporated area of Kern County. In addition, the Authority acknowledges that the Kern County Public Works Department may be required to accept or relinquish roads and other transportation facilities to the Authority in order to build the project. The Authority, as a state agency, is not required by law to obtain local government permission for work on local roads. However, as a policy matter, the Authority has generally required its contractors to obtain encroachment permits from local agencies.

782-653

The commenter states that all work within Kern County's right-of-way is required to obtain an encroachment permit prior to the start of any project activity. The Authority, as a state agency, is not required by law to obtain local government permission for work on local roads. However, as a policy matter, the Authority has generally required its contractors to obtain encroachment permits from local agencies.

782-654

The commenter suggests that changes requested by the Kern County Department of Public Works based on their review of project documents may result in impacts not fully analyzed in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS). The Authority has consulted extensively with local government officials and local public agency staff during the planning and design of the B-P Build Alternatives. Chapter 9, Public and Agency Involvement, of this Final EIR/EIS documents local public agency consultation activities (Table 9-1) from April 2009 to the present. Additionally, Section 9.5.5 of this Final EIR/EIS summarizes the Bakersfield to Palmdale Project Section coordination efforts with cooperating federal agencies as well as state and local agencies under the National Environmental Policy Act (NEPA), and with trustee and responsible agencies under the California Environmental Quality Act (CEQA).

The Authority respects the role of local agencies and local government plans and policies, and has endeavored to minimize conflicts with local plans in the design of the high-speed rail (HSR) system to the maximum extent feasible and consistent with the design requirements for this project. Through Stakeholder Working Group meetings with local agency staff, direct discussions with individual local government officials and staff, and meetings with community groups, the Authority has designed the project to minimize impacts on local communities. The Authority is committed to working cooperatively with local government agencies in the Bakersfield to Palmdale Project Section through project completion.

The Authority understands that project changes may result in additional review under CEQA and NEPA, if necessary.

782-655

The commenter requests that more regionally specific supplemental draft EIRs be prepared. Refer to Response to Comment 741-62, contained within this chapter.

Response to Submission 782 (Michael Dillenbeck, Kern County Public Works Department, April 30, 2020) - Continued

782-656

The commenter requested the current GIS files for the Bakersfield to Palmdale Project Section. The requested shapefiles are included as part of the Administrative Record for the Draft EIR/EIS and have been provided to Kern County.

782-657

This comment requests the evaluation of the project's compatibility with the Kern Region Active Transportation Plan (Kern Council of Governments 2018). The Bakersfield to Palmdale Project Section's compatibility with the Kern Region Active Transportation Plan was analyzed and added to Table 3.2-1, Regional Transportation Plans and Programs and to Appendix 2-H: Detailed Plan Consistency Analysis. As detailed in these sections of the Final EIR/EIS, the Bakersfield to Palmdale Project Section is consistent with the applicable goals of the Kern Region Active Transportation Plan.

782-658

This comment requests the evaluation of the project's compatibility with the Kern County Grade Separation Prioritization Report (Kern Council of Governments 2011). The Bakersfield to Palmdale Project Section's compatibility with the Kern County Grade Separation Prioritization Report was analyzed and added to Table 3.2-1, Regional Transportation Plans and Programs and to Appendix 2-H: Detailed Plan Consistency Analysis. The Morning Drive (Weedpatch Highway/State Route [SR] 184) crossing is listed as a "Group A –High Priority" crossing in the Kern County Grade Separation Prioritization Report. As discussed in Section 2.4.2.2 of this Final EIR/EIS, in response to comments received on the Draft EIR/EIS, the design of Morning Drive (SR 184) in Bakersfield was changed to allow for realignment of Edison Highway and better traffic circulation. As detailed in these sections of the Final EIR/EIS, the Bakersfield to Palmdale Project Section is consistent with the applicable goals of the Kern County Grade Separation Prioritization Report. For further discussion of this design modification, refer to Appendix 3.1-B of this Final EIR/EIS.

782-659

Because the Bakersfield to Palmdale Project Section is an undertaking of the Authority, acting in its capacity as a state agency serving as the federal lead agency under NEPA, construction activity will be under the direction of the Authority rather than local authorities. The Authority appreciates the proposed changes to this impact avoidance and minimization feature (IAMF) but respectfully declines to incorporate the proposed revisions because the majority of the suggested revisions do not meaningfully alter the intent or requirements of the IAMF. As set forth in TR-IAMF#2, the Construction Transportation Plan would be developed in close consultation with affected local jurisdictions. Accordingly, the Authority and its contractor will engage the local agencies as a Construction Transportation Plan is prepared and the Construction Transportation Plan will reflect local concerns to the maximum extent feasible.

782-660

The Authority shares the County's concern regarding the safety of non-vehicular/non-motorized travelers in the vicinity of project construction sites. The intent and effect of TR-IAMF#4 (pedestrian access) and TR-IAMF#5 (bicycle access) is to ensure that safe conditions are maintained on construction sites controlled by the Authority. The Authority respectfully declines to incorporate the suggested revisions because they do not meaningfully alter the intent or requirements of the IAMF.

782-661

TR-IAMF#6 limits deliveries of construction materials during peak hours and requires that deliveries occur outside of peak hours to the extent practicable. As stated in TR-IAMF#6, the contractor shall limit construction material deliveries during peak hours (between 7:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 6:00 p.m.) on weekdays to minimize impacts on roadway traffic. As required by TR-IAMF#2, a Construction Transportation Plan will be prepared to minimize traffic impacts during peak hours. For example, many portions of the study area do not experience peak-period traffic congestion, and there would be no need to exclude deliveries in these areas because the additional construction delivery trucks would not contribute to or cause congestion. For example, Table B-2 of the Transportation Technical Report Supplement (Authority 2019b) indicates that four of the five locations analyzed will experience level of service C or better traffic conditions with the addition of construction trucks.

Response to Submission 782 (Michael Dillenbeck, Kern County Public Works Department, April 30, 2020) - Continued

782-662

The Bakersfield to Palmdale Project Section transportation impact analysis was conducted in 2016 and the baselines for existing and future traffic were based on current information at the time of the analysis. Traffic counts were collected by the Authority in early 2016. Future traffic forecasts were based on the version of the KernCOG regional travel demand model at the time of the analysis (2014 KernCOG Regional Transportation Plan). The 2014 KernCOG regional demand model had a horizon year of 2035. Because the Bakersfield to Palmdale Project Section is an undertaking of the Authority, in its capacity as a state agency, and serving as the federal lead agency under NEPA, the Authority selected 2040 as the horizon year for all current transportation studies on a statewide basis. The use of a common horizon year is necessary for internal consistency of the Final EIR/EIS, even though various regional and subregional travel demand models within the study area have different horizon years. The selected horizon year of 2040 is also the horizon year for the California Statewide Travel Demand Model.

Traffic forecasts from the 2014 KernCOG model were adjusted to 2040 conditions to be consistent with the statewide 2040 horizon year. The 2016 baseline for existing conditions and the 2020 horizon year were used for consistency throughout the EIR/EIS process.

In 2018, KernCOG prepared a revised travel demand model corresponding to the 2018 Regional Transportation Plan with a horizon year of 2042. Although it would be appropriate to use the 2042 traffic forecasts as a baseline for future transportation analyses in Kern County, the HSR project as well as other projects in process at the time the 2018 Regional Transportation Plan was prepared would typically continue to use baselines that were in place at the outset of the project.

782-663

The Authority respects the role of local agencies and local government plans and policies, and has endeavored to minimize conflicts with local plans in the design of the HSR system to the maximum extent feasible and consistent with the design requirements for this project. Through Stakeholder Working Group meetings with local agency staff, direct discussions with individual local government officials and staff, and meetings with community groups, the Authority has designed the project to minimize impacts to local communities. The Authority is committed to working cooperatively with local government agencies in the Bakersfield to Palmdale Project Section through project completion. As the lead agency, the Authority has selected level of service D as the statewide basis for analysis of all transportation facilities. Level of service D is considered to provide a reasonable balance between cost of roadway facilities and delays to travelers.

782-664

Impact TR #1 provides a conservative estimate of the types of impacts and their duration. On a case-by-case basis, shorter closures and shorter detours may be achievable, but some construction activities can only be done over a period of several months. The analysis conducted for the Final EIR/EIS is based on a need to determine environmental impacts under CEQA and NEPA. The Authority shares the County's goal of minimizing rerouting of traffic due to construction. The County's specific requests are noted and will be considered in the design and construction process. Shorter closures and shorter detours will be incorporated into the process whenever possible. Due to the rural nature of the study area, there will be locations where detours of 2 miles or less are not available.

782-665

Due to flat terrain and low points associated with roadway undercrossings below SR 58 in the Edison area, a gravity fed drainage system is not feasible for Alternative 1. Under Alternative 1, pump stations have been proposed to provide a feasible drainage solution. Under the Preferred Alternative - Alternative 2, a gravity-fed drainage system will be provided.

Response to Submission 782 (Michael Dillenbeck, Kern County Public Works Department, April 30, 2020) - Continued

782-666

The commenter suggests the inclusion of a thorough discussion of the maintenance cost of sidewalk, bike path, lighting, and landscaping facilities included as part of minimization measures. The commenter's request for a discussion of the maintenance cost of enhancement measures mentioned in Section 5.5.2.2 is acknowledged. Chapter 5, Environmental Justice, Section 5.5.2.2, Enhancement Measures in the Draft EIR/EIS and this Final EIR/EIS states, "Additional enhancements to the community that would be incorporated into the B-P Build Alternatives would include, but not be limited to, improved street lighting, landscape treatments and tree planting, and improvements to bicycle and pedestrian safety along the length of the alignments. These enhancements are considered part of the HSR project as they are incorporated into the design of the B-P Build Alternatives."

The Authority utilizes memoranda of understanding and cooperative agreements to establish its working relationships with local government entities along the HSR alignment in each project section 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 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 entity over the course of design development.

The Authority uses industry standard practices for addressing local government facilities. The Authority generally ensures that overall local government facilities function in a materially equivalent manner as prior to the relocations or impact. The Authority also generally ensures that the design of the relocations or repair/replacement of facilities meets the local government entity's (as applicable) published (or, if not published, established) design standards in place at a certain point in time (usually the time of agreement execution or the time of final design), and subject to the Authority's evaluation of whether the relocations or replacements have effectuated a betterment or some level of cost sharing.

782-667

The commenter expressed concern over potential secondary impacts resulting from implementation of Mitigation Measure SO-MM#2, Implement Measures to Reduce Impacts Associated with the Division of Communities.

As discussed in Appendix 3.1-A, SO-MM#2 would be implemented prior to construction during the final design phase as well as during construction. SO-MM#2 states that prior to construction in mixed-use communities, the Authority will minimize impacts associated with the Preferred Alternative in the existing communities through a program of outreach to homeowners, residents, land owners, business owners, community organizations, and local officials in affected neighborhoods. These meetings will provide the community an opportunity to identify design and use options that could strengthen community cohesion and be compatible with the existing community character. The Authority will present information at the workshops, giving the community options for the future use of the area beneath or above the rail guideway, and provide an opportunity for individuals to provide feedback and propose solutions. The Authority will consider comments and feedback in planning for the sites. The Authority will be responsible for implementing the measures to reduce impacts through project design and through the long-term management of the measures. This will involve documenting the desired design concepts, incorporating them into the final design, and facilitating ongoing maintenance. The costs associated with the development of these corridor improvements and how these costs will be paid will be determined during consultations with the affected jurisdictions or community organizations. Furthermore, the parties or entities (e.g., the Authority, local government, park or recreation district, or nonprofit organization) responsible for ongoing maintenance of these community areas will be determined. The Authority shall document compliance with this mitigation measure through annual reporting during final design and construction.

The design of the Bakersfield to Palmdale Project Section is based on a preliminary design that is sufficient to disclose environmental impacts, but will become more detailed as the design progresses. Mitigation Measure SO-MM#2 was designed to more explicitly develop the details of the individual mitigation strategies during the final design phase, when the detailed project design is more fully developed. SO-MM#2 would also provide an opportunity for the affected communities to provide feedback and propose solutions. Responsibility for coordination with affected communities would be placed on

Response to Submission 782 (Michael Dillenbeck, Kern County Public Works Department, April 30, 2020) - Continued

782-667

the Authority in order to potentially reduce impacts associated with the division of communities, and the Authority would also produce a written report, to be made public, which would coalesce the input and defining solutions, along with annual reports illustrating compliance with this measure. If additional environmental documentation is required once agreements are in place for implementing SO-MM#2, that documentation will be developed at the time of implementation of any agreed-upon improvements.

782-668

Refer to Response to Comment 782-654, contained in this chapter. The Authority respectfully disagrees with the commenter that the analysis of impacts of the Bakersfield to Palmdale Project Section on the local transportation system is insufficiently clear or simple. Section 3.2 in this Final EIR/EIS identifies impacts on the Kern County transportation system that will occur commencing with construction all the way through and including impacts that will occur related to HSR operations. The level of detail is sufficient for an understanding of the impacts and for identifying mitigation measures. The Authority, as a state agency, is not required by law to obtain local government permission for work on local roads. However, as a policy matter, the Authority has generally required its contractors to obtain encroachment permits from local agencies.

782-669

The commenter suggests that the EIR/EIS be refined into subregional reports. Refer to Response to Comment 741-62, contained in this chapter.

Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020)

Bakersfield - Palmdale - RECORD #829 DETAIL

Status :	Action Pending
Record Date :	6/24/2020
Affiliation Type :	Local Agency
Submission Date :	6/23/2020
Interest As :	Local Agency
Submission Method :	Letter
First Name :	Arnaud
Last Name :	Marjollet
Professional Title :	Director of Permit Services
Business/Organization :	San Joaquin Valley Air Pollution Control District
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City :	Fresno
State :	CA
Zip Code :	93726-0244
Telephone :	(559) 230-5934
Email :	Sharla.Yang@valleyair.org
Cell Phone :	
Email Subscription :	
Add to Mailing List :	Yes
EIR/EIS Comment :	Yes
Attachments :	829_SJVAirPollutionControlDist_letter.pdf (510 kb) 829_SJVAirPollutionControlDist_MOU.pdf (5 mb)

San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

June 23, 2020

California High-Speed Rail Authority
Bakersfield to Palmdale Draft EIR/EIS Comment
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

Project: Draft Environmental Impact Report/Environmental Impact Statement for the California High Speed Rail – Bakersfield to Palmdale Project Section

District CEQA Reference No: 20200355

To Whom It May Concern:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the California High Speed Rail – Bakersfield to Palmdale Project Section. Per the Draft EIR/EIS, the Bakersfield to Palmdale Project Section is approximately 80 miles in length and begins at the Bakersfield Station at F Street in Kern County and traverses south and southeast through the Tehachapi Mountains, then descends into the Antelope Valley where it terminates at the Palmdale Station at Technology Drive and Palmdale Boulevard in Los Angeles County (Project). The Draft EIR/EIS considers four high speed rail alignment alternatives (Alternatives 1, 2, 3, and 5) as well as two design options (the Cesar E. Chavez National Monument [CCNM] Design Option and the Refined CCNM Design Option). The Draft EIR/EIS has identified Alternative 2 with the Refined CCNM Design Option as the preferred alternative for the Project. The District offers the following comments:

829-939

1. **Voluntary Emissions Reduction Agreement (VERA)**

   Air Quality Mitigation Measure #1 (AQ-MM#1) of the Draft EIR/EIS indicates that the High-Speed Rail Authority (HSRA) has entered into a contractual agreement through a Memorandum of Understanding (MOU) and a Voluntary Emissions Reduction Agreement (VERA) with the District by offsetting to net zero the Project's actual construction emissions of VOC, NOx, PM10, and PM2.5.

   On June 19, 2014 the District and HSRA entered into an MOU which establishes the framework for fully mitigating to net zero construction emissions of NOx, VOC, PM10,

Samir Sheikh
Executive Director/Air Pollution Control Officer

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Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020) - Continued

829-939 and PM2.5 for the entire High-Speed Train Project throughout the San Joaquin Valley Air Basin. To date, the District and HSRA have worked closely to ensure construction air quality emissions of NOx, VOC, PM10, and PM2.5 are mitigated in accordance with the MOU. This MOU requires the HSRA to enter into a VERA with the District for any segment, or portion located in the San Joaquin Valley Air Basin that has been approved for construction by the HSRA, or any other applicable state or federal entity. The MOU applies to the above referenced Project. Therefore, the District recommends that the HSRA enter in a VERA with the District to fully mitigate to net zero Project construction emissions.

For reference, the District has attached a copy of the MOU to this letter.

829-940 **2. Construction Emissions Analysis**

The District recommends the Draft EIR/EIS include documentation to support the criteria pollutant emissions presented in Tables 3.3-18 through 3.3-30.

The Draft EIR/EIS states that construction criteria pollutant emissions were analyzed using the California Emissions Estimator Model (CalEEMod) and were summarized in Tables 3.3-18 through 3.3-30. However, the CalEEMod output files presented in the *Air Quality and Global Climate Change Technical Report* are not consistent with the construction criteria pollutant emissions presented in Tables 3.3-18 through 3.3-30 of the Draft EIR/EIS. The District recommends the Draft EIR/EIS include the appropriate modeling output files to support the construction criteria pollutant emissions summarized in Tables 3.3-18 through 3.3-30.

829-941 **3. Health Risk Assessment**

The District recommends the Health Risk Assessment (HRA) be revised and/or clarification be provided based on the following comments.

A. The Draft EIR/EIS concludes the Project would not exceed applicable thresholds for cancer risk and for acute and chronic non-cancer health impacts. In relation, the District's review of the Draft Air Quality and Global Climate Change Technical Report, Appendix H Localized Impacts from Construction, Section H.8 Conclusions states, "…construction activities along the guideway/alignment would result in an incremental increase in cancer risk associated with the DPM emissions from construction equipment exhaust of 6.73 in one million." Upon reviewing Tables H-23 through H-30, the District is unable to verify how the health impacts value were derived. Therefore, the District recommends Tables H-23 through H-30 be clarified for consistency in supporting the 6.73 in a million value.

829-942 B. The air dispersion model used to perform the HRA was AERMOD Version 15181. The District recommends the lead agency verify that the latest version of AERMOD was used at the time of the analysis prepared.

829-943 C. The Source Parameters identified in the Appendix H Localized Impacts from Construction, Section H.5.1.5 of the Air Quality and Global Climate Change Technical Report, included the following three source types: 1) rail segments, 2) road crossings, and 3) Palmdale Station. The District would like to clarify modeling files were not provided for the road crossings and the Palmdale Station. Therefore, the District was unable to verify the analyses for these sources.

829-944 D. Within the AERMOD modeling runs, the District was unable to identify where the modeled emission rates for each source were derived from. For example, within the 'HSRB_P_Bakersfield_Alt1_NO2' modeling run, the modeled source's emission rate is based on an hourly emission rate of 71.5 lb/hr. This value does not appear to be presented in the Draft EIR/EIS. The District recommends the Draft EIR/EIS include precise references and, if necessary, calculation methodologies for deriving all modeling parameters. This includes, but is not limited to listing all assumptions used and providing sample calculations.

829-945 E. The maximum modeled concentrations from the AERMOD modeling runs do not appear to be consistent with the maximum modeled concentrations used in the Project HRA and AAQA. For example, within the 'Mod_HRA_Alt2_Mit-Bakersfield_Summary_Risk_Calc_Construction_10-11-2016.xlsx' spreadsheet, the modeled concentration (C_{air}) used for calculating carcinogenic risk is 0.02067 $\mu g/m^3$ (based on the annual average). Within the modeling run provided (HARB-P_SJV_Alt2_Bakersfield_DPM), the maximum modeled concentration for the annual averaging period is 0.38691 $\mu g/m^3$. The District recommends the Draft EIR/EIS include a discussion clarifying how all values used for health impact determinations were derived. This includes but is not limited to providing all supporting documentation for the derivation of these values, listing all assumptions and providing sample calculations.

829-946 F. The Project AAQA only evaluated SO_2 emissions for the 1-hour and 24-hour averaging periods. When evaluating SO_2 emissions for all AAQAs, the District requires the 1-hour, 3-hour, 24-hour and annual averaging periods to be evaluated against their respective standards.

829-947 G. For the NO_2 AAQA (HSRB_P_Bakersfield_Alt1_NO2 modeling run), the background value entered (6.0) is in unit of parts per billion (PPB), but the unit presented in the Tables H-13 through H-20 is 6.0 $\mu g/m^3$. The District recommends the Appendix H Localized Impacts from Construction, Section H.5.1.5 of the Air Quality and Global Climate Change Technical Report, specifically Tables H-13 through H-20 be revised with the PPB unit for consistency in the modeling run.

Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020) - Continued

829-948

4. District Rule 9510 Indirect Source Review (ISR)

The proposed Project is subject to Rule 9510 Indirect Source Review (ISR) and requires the submittal of an Air Impact Assessment (AIA) application.

The purpose of District Rule 9510 (Indirect Source Review) is to reduce the growth in both NOx and PM10 emissions associated with development and transportation projects from mobile and area sources associated with construction and operation of development projects. The rule encourages clean air design elements to be incorporated into the development project. In case the proposed project clean air design elements are insufficient to meet the targeted emission reductions, the rule requires developers to pay a fee used to fund projects to achieve off-site emissions reductions.

District Rule 9510 applies to any transportation or transit development projects where construction exhaust emissions equal or exceed two (2.0) tons of NOx or two (2.0) tons of PM10. Therefore, the Project is subject to District Rule 9510 and an Air Impact Assessment (AIA) application is required to be submitted to the District. Note, the AIA must be approved by the District prior to the Project generating any emissions, such as starting ground disturbance for construction.

Information about how to comply with District Rule 9510 can be found online at: http://www.valleyair.org/ISR/ISRHome.htm.

The AIA application form can be found online at: http://www.valleyair.org/ISR/ISRFormsAndApplications.htm.

829-949

5. District Rules and Regulations

This Project may also be subject to other District rules and regulations.

A. This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. For further information or assistance, the Project proponent may contact the District's Small Business Assistance (SBA) Office at (661) 392-5665.

B. The Project may also be subject to District rules and regulations, including: Regulation VIII, (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). In the event an existing building will be renovated, partially demolished or removed, the Project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).

C. The Project may be subject to District Rule 9410 (Employer Based Trip Reduction) if the Project would result in employment of 100 or more "eligible" employees.

829-949

District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

Information about how District Rule 9410 can be found online at: www.valleyair.org/tripreduction.htm.

For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org.

D. The above list of rules is neither exhaustive nor exclusive. To identify other District rules or regulations that apply to this Project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District's Small Business Assistance Office at (661) 392-5665.

Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm.

The District appreciates the HSRA ongoing commitment to working with the District and appreciates the opportunity to aid the HSRA in identifying and mitigating impacts on air quality. If you have any questions or require further information, please contact Sharla Yang by e-mail at Sharla.Yang@valleyair.org or by phone at (559) 230-5934.

Sincerely,

For: Arnaud Marjollet
Director of Permit Services

AM: sy

Enclosure: Memorandum of Understanding between District and HSRA

Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020) - Continued

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding ("MOU") is entered into by the California High-Speed Rail Authority ("Authority") and the San Joaquin Valley Unified Air Pollution Control District ("District"). Authority and District are collectively referred to herein as the "Parties" with each being a "Party".

RECITALS

WHEREAS, District is an air pollution control district formed by the counties of Fresno, Kings, Madera, Merced, San Joaquin, Stanislaus and Tulare, and the Valley portion of Kern, pursuant to California Health and Safety Code section 40150, et seq.; and

WHEREAS, District is responsible for developing and implementing air quality control measures within the District Boundaries as depicted in Exhibit A ("District Boundaries" or "San Joaquin Valley Air Basin") attached hereto and incorporated herein, including air quality control measures for stationary sources, transportation sources, and indirect sources; and

WHEREAS, despite the best efforts of District, air quality within District Boundaries remains impaired such that the San Joaquin Valley Air Basin is not in attainment of federal Clean Air Act standards for ozone and its precursors NOx and VOCs (extreme nonattainment) and PM2.5 and is in Attainment/Maintenance status for PM10 (NOx, VOC, PM10 and PM2.5 collectively, "Criteria Pollutants"); and

WHEREAS, emissions of Criteria Pollutants from the Authority's planned high-speed rail construction within District Boundaries would exacerbate that non-attainment status and could threaten that Attainment/Maintenance status; and

WHEREAS, the San Joaquin Valley Air Basin is unique meteorologically in that it is surrounded on three sides by mountain ranges, including to the west which significantly limits the ability of ocean weather patterns and winds to refresh air in the basin; and

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WHEREAS, the Authority, in partnership with the Federal Railroad Administration ("FRA"), is developing a high-speed train system ("HST System"), which includes construction of guide-way segments, and ancillary facilities such as a Heavy Maintenance Facility, stations, and overpasses for California pursuant to the California High-Speed Rail Act (Public Utilities Code section 18500 *et seq.*) ("Rail Act") and the Safe, Reliable High-Speed Passenger Train Bond Act for the 21st Century (codified at Streets and Highways Code section 2704 *et seq.*) ("Bond Act") that would serve the San Francisco Bay Area, Sacramento, Central Valley, Los Angeles and San Diego through various station-to-station segments ("Segments") (as depicted in Exhibit B); and

WHEREAS, the HST System includes segments or portions thereof that will be constructed, if and when funding can be secured, within the boundaries of the San Joaquin Valley ("SJV") including the following: Merced to San Jose (portion), Merced to Fresno (all), Fresno to Bakersfield (all), Bakersfield to Palmdale (portion), and Sacramento to Merced (portion), collectively referred to as "HST SJV District Portion"; and

WHEREAS, the Authority completed Program-level Environmental Impact Statements/Reports ("EIS/EIR") in 2005, 2008, 2010 and 2012 pursuant to the National Environmental Policy Act ("NEPA") and California Environmental Quality Act ("CEQA") evaluating impacts of the HST System, and selecting preferred route corridors; and

WHEREAS, a project level Final EIS/EIR ("MF FEIR") for the Merced to Fresno Segment ("MF Segment") was approved and certified via Resolution 12-19 ("MF FEIR Resolution") and the MF Segment approved and CEQA findings made via Resolution 12-20 ("MF Segment Resolution") by the Authority's Board of Directors in May 2012 and FRA's associated Record of Decision ("ROD") issued on September 2012; and

WHEREAS, construction of a portion of the MF Segment (from approximately Madera to downtown Fresno) is anticipated to commence in 2014 with connections to the San Francisco Bay Area and Los Angeles Basin expected after year 2028; and

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Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020) - Continued

WHEREAS, the Authority found in the MF FEIR and MF FEIR Resolution that construction of the MF Segment would cause significant air quality impacts from construction emissions of Criteria Pollutants because the San Joaquin Valley Air Basin is in non-attainment for Criteria Pollutants; and

WHEREAS, the Authority has included in the MF Segment Resolution, and in the Draft EIR/EIS for the Fresno-Bakersfield Segment (and anticipates so including in the draft environmental documents for other Segments of the HST SJV District Portion) various requirements and mitigation measures to reduce significant construction emissions associated with the HST SJV District Portion (such as using the cleanest construction and hauling fleet as reasonably practicable, as detailed in MF FEIR AQ-MM#1 and #2); and

WHEREAS, nevertheless, Criteria Pollutant(s) emitted during HST construction within the District Boundaries would still exacerbate and/or threaten the existing non-attainment and maintenance status for Criteria Pollutants within the District Boundaries; and

WHEREAS, during the public process leading up to the MF FEIR, the District recommended in writing that the Authority enter into a Voluntary Emission Reduction Agreement ("VERA") with the District as an additional mitigation measure (because of the emissions offsets VERA implementation would achieve) for construction emission impacts the MF FEIR concluded would occur in the MF Segment; and

WHEREAS, the MF Segment Resolution committed the Authority to entering into a VERA with the District for the MF Segment as a mitigation measure to accomplish net-zero MF Segment construction emissions of Criteria Pollutants because of the San Joaquin Air Basin's difficult air quality challenge (*i.e.*, its non-attainment status), which VERA now has been drafted for the funded Madera-to-Fresno portion of the MF Segment and is near ready for execution ("Madera-to-Fresno VERA"); and

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WHEREAS, the Authority understands that any significant HST construction emissions air quality impacts from Criteria Pollutants within the District Boundaries could be mitigated through various measures, including emissions offsets to net zero through entry into VERAs, which approach would address the District's view that any net HST construction emissions of Criteria Pollutants within the District Boundaries are impacts that must be fully mitigated; and

WHEREAS, the District has developed Incentive Programs around several core principles, including cost-effectiveness, integrity, effective program administration, excellent customer service, the efficient use of District resources, fiscal transparency and public accountability; and

WHEREAS, the District's Incentive Programs involve the District using monies (such as grant funds and project-proponent-provided monies via a VERA) to fund (usually on a percentage basis) the purchase and use by third parties of newer equipment that emits fewer Criteria Pollutants to replace older, less-clean-burning equipment (such as farm tractors), which the District administers through Individual Incentive Program Funding Agreements ("IIPFAs"); and

WHEREAS, the District's IIPFAs require the user of the new equipment to use the new equipment for a minimum number of hours (based on the user's historical use of the replaced equipment) over a specified number of years, and require permanent destruction of the replaced equipment; and

WHEREAS, the IIPFAs, because of their requirements, result in reductions of Criteria Pollutants that get assigned to the project proponent providing the funding to offset emissions by that project proponent ("Criteria Pollutant VERA Offsets"); and

WHEREAS, the Criteria Pollutant VERA Offsets, because of the requirements of and protections in the IIPFAs, are secured and certified to the Authority by the District ("Secured Criteria Pollutant VERA Offsets") upon execution of each IIPFA; and

WHEREAS, the District's Incentive Programs are regularly audited by independent outside agencies including professional accountancy corporations on

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Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020) - Continued

behalf of the federal government, the California Air Resources Board ("ARB"), the California Department of Finance and the California Bureau of State Audits; and

WHEREAS, the District has determined that with appropriate funding from Authority, the District can source, secure and certify Criteria Pollutant VERA Offsets as necessary for construction of the HST SJV District Portion.

AGREEMENT

NOW THEREFORE, the Authority and the District hereby agree as follows:

1. **Offset of Construction Emissions of Criteria Pollutants**

(i) The Authority shall fully offset all HST SJV District Portion-related HST construction emissions from Criteria Pollutants by achieving surplus, quantifiable and enforceable emissions reductions of Criteria Pollutants.

(ii) For the purpose of this MOU, "fully offset" or "net zero" means that the total amount of all Criteria Pollutants emission reductions secured by the offset reduction measures is equal to, or greater than, the total amount of actual Criteria Pollutant HST construction emissions within the HST SJV District Portion, minus the projected emissions of Criteria Pollutants that would have occurred in the locations of the HST District Portion construction in the absence of HST construction as may be feasible and technically calculable for specific facilities HST might replace (as individual VERAs may include). "Surplus" emission reductions are reductions that are not otherwise required by existing laws or regulations.

(iii) In order to fully offset such construction-related air emissions from the HST SJV District Portion, upon each Segment in the HST SJV District Portion having been approved for construction by the Authority and any applicable state or federal entity, having secured funding for construction, and having approved or certified associated environmental review reports and/or statements as required by applicable law ("Certified Environmental Document"), the Authority and District shall enter into a VERA substantially in the form of the Madera-to-Fresno VERA to cover the portion of the Segment approved and funded for construction within District Boundaries prior to

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the commencement of construction of said portion. Notwithstanding the above, nothing in this MOU shall prevent the Authority from commencing any construction if, despite the Authority's best efforts, timely entry into the associated VERA did not occur; in such event, the Parties shall work cooperatively to accomplish entry into the VERA in time for emissions offsets to occur in a timely manner to satisfy applicable law such as contemporaneous offset timing requirements established by the U.S. Environmental Protection Agency for general conformity.

2. **VERA Implementation**

(i) Upon entering into a VERA, the Authority shall provide the District with a meaningful amount of Air Quality Mitigation Funds (as a deposit) as may be specified in each VERA, which the District shall place in a District trust or escrow account until committed in an executed and Authority-approved IIPFA. Such Funds are intended to fund equipment replacement and/or retrofit to achieve Criteria Pollutant VERA Offsets and to fund the District's administrative expenses to implement the VERA, as may be specified in each VERA. The Authority acknowledges that the District will require availability of a meaningful amount of such Funds prior to soliciting and negotiating IIPFAs to accomplish Criteria Pollutant VERA Offsets on the Authority's behalf as part of any individual VERA. The District acknowledges that construction of the HST SJV District Portion is not fully funded, and future funding sources and availability can affect how individual VERAs get funded and the provisions and terms in such VERAs. The total estimated amount of Air Quality Mitigation Funds necessary for each VERA are based on (a) the total tonnage of Criteria Pollutants estimated to be emitted during the HST construction covered by each VERA, as estimated within a Certified Environmental Document or some subsequent estimate based on more then-up-to-date construction information and (b) District's cost per ton per the then-applicable rate contained in District Rule 9510 as set forth in each VERA.

(ii) Upon receipt of a meaningful amount of such Funds as relates to an individual VERA and upon the Authority's written notice to proceed from its Contract

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Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020) - Continued

Manager to the District based on relative certainty of a likely construction start date for the HST construction covered by the relevant VERA, the District will commence negotiating and executing (after Authority limited review and approval) and funding (from the Funds in trust/escrow) IIPFAs to achieve Secured Criteria Pollutant VERA Offsets on behalf of the Authority in a timely manner to satisfy applicable law or general conformity regulations requiring emission reductions to be achieved contemporaneous to the actual emissions to be offset. The Authority will continue to fund the trust/escrow account, and District will continue to negotiate and execute additional IIPFAs to create additional Secured Criteria Pollutant VERA Offsets until sufficient Secured Criteria Pollutant VERA Offsets have been funded to accomplish full offset to net zero for that VERA.

(iii) Upon execution of each IIPFA, District shall issue to the Authority a Secured Criteria Pollutant VERA Offsets Receipt, by which the District ensures to the Authority that such associated offsets listed in the Receipt have been secured with no further involvement or funding by the Authority.

(iv) Through periodic reporting to each other, the Authority will monitor the actual emissions resulting from construction and the District will monitor and match such actual emissions to the total offsets stated in Secured Criteria Pollutant VERA Offsets Receipts issued to date. The District shall certify in writing to the Authority when the total Secured Criteria Pollutant VERA Offsets listed in all Receipts issued fully offset the actual construction emissions of Criteria Pollutant(s) from the HST Segment portion covered by the associated VERA.

3. **Refunds**

When total offsets stated in Secured Criteria Pollutant VERA Offsets Receipts equal or exceed total actual construction emissions of Criteria Pollutants for the HST construction covered in a VERA, the District shall, upon Authority written request, refund the Authority any remaining Air Quality Mitigation Funds which are not

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encumbered through IIPFAs. The District shall have a reasonable period of time to refund the unencumbered Air Quality Mitigation Funds.

4. **Transfer of Segment Excess Emission Reductions**

If total offsets stated in Secured Criteria Pollutant VERA Offsets Receipts exceed total construction emissions of Criteria Pollutants for the HST construction covered in a VERA, the Authority shall be credited with such excess emission ("VERA Excess Emission Reduction" or "Excess"). Such VERA Excess Emission Reductions shall be transferred to any other then-existing or future Authority-District VERA. If there is no existing VERA and likely will not be a future VERA in time for the Authority to get value for the Excess, the Authority may transfer the Excess to a third-party developer.

5. **District Rule 9510-Indirect Source Review**

Authority acknowledges that it is required to comply with all applicable laws that may be in effect as the HST SJV District Portion is implemented, such as the District's current Rule 9510 (including its requirement to submit an Air Impact Assessment Application). The Authority acknowledges that it is subject to all applicable provisions of District Rule 9510 that are in effect at the time of submitting an Air Impact Assessment Application, but the District anticipates that Criteria Pollutant Offsets to be accomplished through VERAs as contemplated by this MOU will satisfy the emissions reductions requirements of current Rule 9510.

6. **Term of MOU**

This MOU shall be effective upon the date it is signed. The Parties acknowledge that construction of the HST SJV District Portion could span one or more decades. The Parties agree to work cooperatively together over that time period to evaluate any amendments necessary to this MOU to reflect any relevant circumstances that may change, including but not limited to changing state and federal law requirements related to air quality, changes (positive or negative) in the Clean Air Act attainment status of the San Joaquin Air Basin for Criteria Pollutants or other pollutants, changing and evolving HST funding, and changing state and federal law requirements related to

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Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020) - Continued

the HST System. This MOU shall be terminated by its terms when total offsets stated in Secured Criteria Pollutant VERA Offsets Receipts equal or exceed total actual construction emissions of Criteria Pollutants for the HST SJV District Portion.

7. **Exhibits**. The Exhibits to this MOU are fully incorporated and are a part of this MOU, and are:

A. District Boundaries Map

B. HST System and Segment Map

8. **Miscellaneous.** The Recitals set forth above are hereby incorporated into the terms of this MOU. Counterpart and facsimile/computer image signatures shall be treated as originals. Notices under this MOU shall be given in writing to the persons and addresses listed in the then-most-current VERA. This MOU contains all understandings between the Parties as to the matters covered herein and incorporates, integrates and supersedes any different or other oral or written understandings between the Parties as to the matters covered herein. This MOU was prepared equally by both Parties.

IN WITNESS WHEREOF, the Authority and District have executed this MOU and agree that it shall be effective as of the date first written above.

AUTHORITY

High Speed Rail Authority

Jeff Morales
Chief Executive Officer

DISTRICT

San Joaquin Valley Unified Air Pollution Control District

Hub Walsh
Governing Board Chair

Recommended for approval:
San Joaquin Valley Unified Air Pollution Control District

Seyed Sadredin
Executive Director/APCO

Approved as to legal form:

San Joaquin Valley Unified Air Pollution Control District

Annette Ballatore-Williamson
~~Interim~~ District Counsel

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Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020) - Continued

EXHIBIT A: District Boundaries/San Joaquin Valley Air Basin

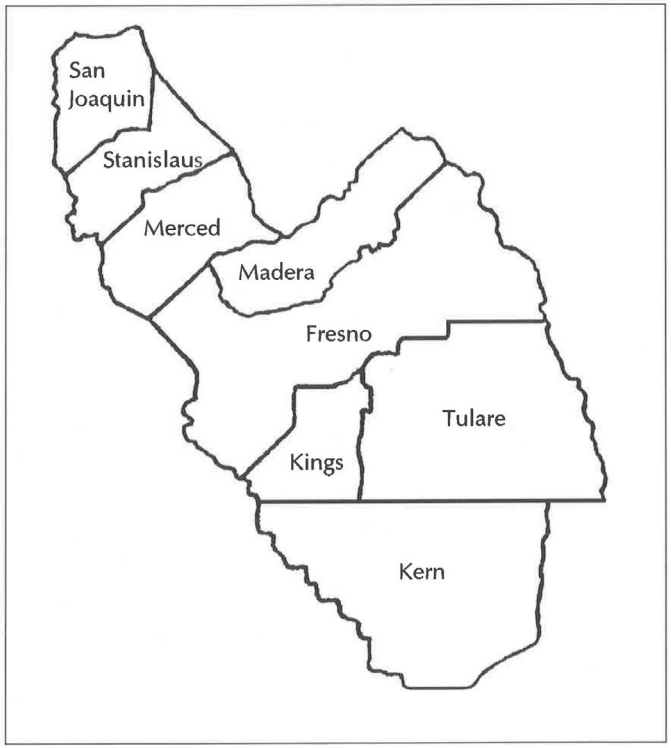

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EXHIBIT B: Segments/Corridors of the HST System

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Response to Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020)

829-939

This comment outlines the Memorandum of Understanding between HSR and the San Joaquin Valley Air Pollution Control District (SJVAPCD), which requires the Authority to enter into a Voluntary Reduction Agreement (VERA) with the district for any portion of the HSR system within the San Joaquin Valley Air Basin. The commenter also recommends that the Authority enter into a VERA with the district to fully mitigate to net zero project construction emissions. The intent of Mitigation Measure AQ-MM#1 is to require a VERA for the Bakersfield to Palmdale Project Section. The text of AQ-MM#1 in the Draft EIR/EIS specifically included the performance standard to fully offset to net zero construction emissions of NO_x, volatile organic compounds, PM_{10}, and $PM_{2.5}$. Mitigation Measure AQ-MM#1 has been revised to include a statement which says, "The Authority shall enter into a contractual agreement through a Voluntary Emission Reduction Agreement (VERA)." The air districts have confirmed that offsets are based on the project's anticipated annual emission rates and HSR is currently working on agreements with the district for the purchase of such offsets.

829-940

This comment states that construction criteria pollutant emission results reported in the Draft EIR/EIS are not consistent with the output presented in the Air Quality and Global Climate Change Technical Report (Authority 2018). It should be noted that emission estimates in CalEEMod were for the entire length of the project section. The resulting emissions were scaled by air district for reporting the Draft EIR/EIS based on project section length and anticipated activities within each air basin. Additionally, construction equipment estimates for the project changed after the Air Quality and Global Climate Change Technical Report was prepared, resulting in changes to the emission calculations; therefore the emission results presented in the Draft EIR/EIS are slightly different. Supporting data and calculations reflecting these changes are provided in the Air Quality and Global Climate Change Technical Report Supplement (Authority 2018) and in the Draft EIR/EIS.

829-941

Of all of the cancer risk values in Tables H-23 through H-30, the highest cancer risk value of 6.73 in one million is found in Table H-24 for the residential receptor at the age group for infants between 0 and 2 years old. The California Office of Environmental Health and Hazard Assessment has developed the age-specific breathing rates for use in health risk assessments. The health risk formula and calculations are provided in the footnotes of the spreadsheet. Infants and young children are often more susceptible to the health effects of air pollution because their immune systems and developing organs are still immature. Infants and children generally breathe more rapidly than adults, which increases their exposure to any pollutants in the air. Thus, separate inhalation health risk assessment on infants, children, and adults were created in the spreadsheet. Because all cancer risk values for all age groups are at or below the 6.73 in one million value, all maximum cancer risks of 6.73 in one million or less would be below the SJVAPCD Health Risk Threshold of 20 in one million.

829-942

The AERMOD modeling analysis occurred during the months between July 2016 and October 2016. The AERMOD version 15181 was released by the United States Environmental Protection Agency (USEPA) on July 24, 2015. On December 20, 2016, USEPA released an updated version of the AERMOD model to version 16216. Therefore, the AERMOD version 15181 was valid for use at the time of analysis. Use of the later version of AERMOD 16216 would not have led to measurably different calculations and significance determinations included in the Final EIR/EIS would remain.

Response to Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020) - Continued

829-943

The estimated annual construction emissions for all criteria pollutants are presented in Tables H-4 through H-9 for the rail segments, Table H-10 for the Road Crossings, and Table H-11 for the Palmdale Station of the Air Quality and Global Climate Change Technical Report (Authority 2018).

The AERMOD modeling files includes the following three source types: 1) rail segments, 2) road crossings, and 3) Palmdale Station. It should be noted that the proposed project traverses three air districts. The estimated emissions unit of measures is converted from tons per year to pounds per hour as emission rate inputs in the AERMOD model. For the rail segment analysis, the estimated construction emissions for the entire length of the rail track within the air districts are divided by two, based on the 2-mile rail segment area. For example, the estimated length of the rail segment for the SJVAPCD area is approximately 23.5 miles, whereas the number of miles is divided by two would be equal to approximately 11.73 2-mile rail segments. The total emissions for the 2-mile rail segment were estimated by using 1/38 of the total 75-mile project length for each pollutant being analyzed, or 1/38 of the values in Tables H-1 through H-3. To properly allocate the total emissions to each construction work area, each of the work areas was reviewed and allocated pollutant construction emissions based on the size of the work area, the intensity of the work activities, and the relative weighting in comparison to 2 miles of the 75-mile project length.

829-944

The commenter is referring to the AERMOD file that includes the construction emissions without the implementation of the IAMF. The AERMOD assumptions and methodologies are discussed in Appendix H: Localized Impacts from Construction of the Bakersfield to Palmdale Project Section Air Quality and Global Climate Change Technical Report (Authority 2018).

Because the Authority will implement the IAMF as part of the proposed project, all construction emissions with IAMF were modeled and included in the AERMOD files.

With the control measures of Tier 4 engines, which is included as AQ-IAMF#4 in the Draft EIR/EIS, the estimated emission of 8.18 tons per year as presented in Table H-3 was then divided by 11.73 rail segments. The estimated construction nitrogen dioxide (NO_2) emission rate of 0.1591 pounds per hour was used as input to the AERMOD model. According to the AERMOD output file 'HSRB_P_MIT_Alt2_Bakersfield_NO2.ADO', the predicted maximum 1-hour and annual NO_2 concentrations are 21.59 micrograms per cubic meter and 0.54 micrograms per cubic meter, respectively, as presented in Table H-13 of the Air Quality and Global Climate Change Technical Report.

829-945

The commenter is referring to the AERMOD file that includes the construction emissions without the implementation of the IAMF. Construction emissions with IAMF are included in the AERMOD files (as included with the initials "MIT" in the filenames). The AERMOD modeling run provided in 'HSRB_P_MIT_Alt2_Bakersfield_DPM.ADO', the maximum modeled concentration for the 24-hour and annual averaging period are 0.13112 micrograms per cubic meter and 0.02067 micrograms per cubic meter, respectively (as presented in Table H-13). The resultant AERMOD predicted exhaust PM_{10} concentration (Cair) of 0.02067 micrograms per cubic meter (based on the annual average) is used for calculating carcinogenic risk, as shown in Table H-23 of the Air Quality and Global Climate Change Technical Report.

Response to Submission 829 (Arnaud Marjollet, San Joaquin Valley Air Pollution Control District, June 23, 2020) - Continued

829-946

The commenter is requesting additional sulfur dioxide (SO_2) analysis based on the USEPA National Ambient Air Quality Standards (NAAQS). Two types of NAAQS have been established: primary standards, which protect public health, and secondary standards, which protect public welfare from non-health-related adverse effects, such as visibility restrictions. The 1-hour and 24-hour SO_2 averaging periods are regulated under the primary standards for both NAAQS and California Ambient Air Quality Standards. The 3-hour SO_2 NAAQS is regulated under the secondary standard which contains no health based standard. These 3-hour and annual arithmetic data are not necessary to determine whether the proposed project would impede the ability of the region to attain the relevant SO_2 ambient air quality standards. For the short-term construction emission analysis, the worst-case SO_2 and nitrogen dioxide (NO_2) emissions would be modeled for comparison to both the 1-hour state standard and 1-hour national standard. Based on the information from the USEPA's "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Revised" (EPA-454-R-92-019, page 4-16), the model predicted "worst-case" 1-hour concentration for a single source can be used to estimate the "worst-case" 3-hour, 8-hour, 24-hour, and annual concentrations by using the multiplying factors to a longer averaging period. It should be noted that the USEPA has not developed multiplying factors for "area" sources. For the area source algorithm, USEPA guidance recommends that the maximum 1-hour concentration be conservatively assumed to apply to averaging periods out to 24-hours. In many cases, it is reasonable to assume that the compliance demonstration for the 24-hour NAAQS is protective of the annual NAAQS. For example, USEPA guidance recommends that the maximum 1-hour concentration be conservatively assumed to apply a multiplying factor of 0.9 for the 3-hour averaging period and 0.08 for the annual averaging period.

In Table H-14 in Appendix H of the Air Quality and Global Climate Change Technical Report (Authority 2018), the maximum modeled concentration for the 1-hour SO_2 average period is 0.40 micrograms per cubic meter. With the addition of the background SO_2 concentration of 14 micrograms per cubic meter, the total ground-level SO_2 concentration would be 14.40 micrograms per cubic meter. With the application of a multiplying factor of 0.9 for the 3-hour averaging period, the estimated SO_2 concentration would be 12.96 micrograms per cubic meter, which is below the 3-hour SO_2 standard of 1,300 micrograms per cubic meter (or 0.50 parts per million). In

829-946

addition, the application of the a multiplying factor of 0.08 for the annual averaging period would generate an estimated SO_2 concentration of 1.15 micrograms per cubic meter, which is below the annual SO_2 standard of 79 micrograms per cubic meter (or 0.03 parts per million). Therefore, the 3-hour and annual averaging period emission concentrations indicate that emissions would be below the NAAQS standards. As a result, there will be no SO_2 emission impact under the primary standards for both NAAQS and California Ambient Air Quality Standards as a result of the project.

829-947

In response to this comment, the Background NO_2 Concentration has been corrected in this Final EIR/EIS. The background NO_2 value of 6 parts per billion by volume is equivalent to 11 micrograms of gaseous pollutant per cubic meter of ambient air. The conversion rate for NO_2 is 1 parts per billion, which equals 1.88 micrograms per cubic meter. The AERMOD output unit of measures is reported in micrograms per cubic meter. Therefore, the background NO_2 concentration in Tables H-13 through H-20 of the Air Quality and Global Climate Change Technical Report have been changed from 6 parts per billion to 11 micrograms per cubic meter. This change does not affect the findings or conclusions presented in the Draft EIR/EIS.

829-948

This comment provides background information on District Rule 9510. This Rule is summarized in Section 3.3.2.3 Regional and Local of this Final EIR/EIS. The Authority will submit an Air Impact Assessment application prior to initiating construction on the Bakersfield to Palmdale Project Section.

829-949

This comment provides additional background information on District Rules. Section 3.3.2.3 of this Final EIR/EIS summarizes SJVAPCD air quality-related rules and regulations that would be applicable to the project. Construction and operations of the project would be consistent with SJVAPCD regulations.

Submission 793 (Roderick Diaz, Southern California Regional Rail Authority, April 30, 2020)

Bakersfield - Palmdale - RECORD #793 DETAIL

Status :	Action Pending
Record Date :	4/30/2020
Affiliation Type :	Local Agency
Submission Date :	4/30/2020
Interest As :	Local Agency
Submission Method :	Project Email
First Name :	Roderick
Last Name :	Diaz
Professional Title :	Director, Planning & Development
Business/Organization :	Southern California Regional Rail Authority
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Cell Phone :	213.435.4193
Email Subscription :	
Add to Mailing List :	
EIR/EIS Comment :	Yes
Attachments :	20200428_Bakersfield_to_Palmdale_HSR_Project_Section_Draft_EIREIS__SCRRA_Comment_letter_FINAL.pdf (601 kb)

Stakeholder Comments/Issues :

Dear California High Speed Rail Authority,

Enclosed please find the comment letter to the Bakersfield to Palmdale Project Section - Draft Environmental Impact Report/Environmental Impact Statement from the Southern California Regional Rail Authority.

[Metrolink]<http://www.metrolinktrains.com/>

Roderick Diaz

Director, Planning & Development

213.452.0455 t

213.435.4193 m

Submission 793 (Roderick Diaz, Southern California Regional Rail Authority, April 30, 2020) - Continued

METROLINK.
SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY
900 Wilshire Blvd. Suite 1500 Los Angeles, CA 90017
metrolinktrains.com

April 28, 2020

Attn: Draft EIR/EIS for the Bakersfield to Palmdale Project Section
California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

RE: Bakersfield to Palmdale Project Section – Draft Environmental Impact Report/Environmental Impact Statement Comment

Dear California High-Speed Rail Authority:

The Southern California Regional Rail Authority (SCRRA) has received and reviewed the Draft Environmental Impact Report (EIR) / Environmental Impact Statement (EIS) for the Bakersfield to Palmdale Project Section of the California High-Speed Rail (CHSR) Project. As a Cooperating Agency in the project, we thank you for the opportunity to provide written comments on key issues relative to SCRRA within the project limits. We appreciate the continued working relationships between our agencies and other stakeholders in this very important project can be transformative for Southern California. Beyond this comment letter, SCRRA will continue to work collaboratively with the California High-Speed Rail Authority (CHSRA) to ensure our comments are adequately addressed for this and all subsequent Draft EIR/EIS documents.

The Bakersfield to Palmdale section of the project parallels the Metrolink Antelope Valley Line between Lancaster and Palmdale Metrolink Stations. Areas needing additional coordination with SCRRA or analysis in the Draft EIR/EIS include the following:

General Comments

793-523 Since the CHSRA is proposing changes that affect the position of tracks both within right-of-way owned by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Union Pacific Railroad (UPRR), the CHSRA shall obtain approval through complete agreements with both entities and with SCRRA before advancing plans and designs for further project implementation.

793-524 SCRRA requests compliance with its' 2014 SCRRA Design Criteria Manual when project construction and/or operations impact or run adjacent to Metrolink infrastructure. The Design Criteria Manual is available at:

https://metrolinktrains.com/globalassets/about/engineering/scrra_design_criteria_manual.pdf.

793-525 Given the potential impacts of the Bakersfield to Palmdale Project to Metrolink operations, there are areas that still require coordination and satisfactory resolution beyond the current planning phase for the complete CHSRA project to be fully accepted by SCRRA. We are committed to working with all stakeholders to finalize the design to fulfill the needs of all operators during construction and through final build-out.

General Design

793-526
1. The Draft EIR/EIS notes that Sierra Avenue will be realigned for a stretch of 4.5 miles. Maintenance access must be provided for Metrolink personnel to main tracks and signals within this stretch of roadway realignment. CHSRA may need to provide maintenance underpasses beneath CHSRA/UPRR tracks to provide access to tracks where crossing at-grade is prohibited (Summary – Section 5.2.4, pg. 19).

793-527
2. Section AA shows a 24-foot wide drainage channel that appears to conflict with the proposed pedestrian underpass to the Metrolink platform (Alignment Plans – Part 1 of 4, TT-B3017, pg.32). Please clarify and ensure that such conflict does not exist.

793-528
3. In the Alignment Plans, no turnout size is shown for Metrolink. Please ensure the designs show a Number 24 turnout at a minimum. (Alignment Plans – Part 4 of 4, TT-D1253, pg. 30)

793-529
4. Bridge columns within 25 feet of centerline of Metrolink track will require pier protection per SCRRA's 2016 Grade Separation Guidelines (Section 7.2 and 7.7).

   The requirements are available at:

   https://metrolinktrains.com/globalassets/about/engineering/scrra_grade_separation_guidelines.pdf.

793-530
5. Lighting shall be placed beneath all overhead bridges over Metrolink tracks for safety and to deter trespassing and loitering per SCRRA's 2016 Grade Separation Guidelines (Section 7.10 – website provided in General Design – Response #4).

Track Infrastructure

793-531 The CHSRA tracks should be placed in between Metrolink and UPRR tracks between Lancaster Boulevard and Avenue J. A CHSRA flyover across the Metrolink tracks can be constructed between Avenue J and Avenue K to place the CHSRA tracks on the west side of the corridor prior to the proposed CHSRA maintenance facility. Since the CHSRA and UPRR have no stations/facilities in this section and Metrolink does, the optimal design would leave the Metrolink track on the outside of the three separate rail corridors (Summary – Section 5.2.1, pg. 16) to facilitate access for Metrolink passengers and personnel. This configuration would also avoid the expense and disruption of relocating the Lancaster Metrolink station, which just received an award in the 2020 cycle of funding for the Transit and Intercity Rail Capital Program (TIRCP) to improve the operation and capacity of the Metrolink terminal station.

Submission 793 (Roderick Diaz, Southern California Regional Rail Authority, April 30, 2020) - Continued

Lancaster Station

793-532 Information is scarce in the report on impacts to the Lancaster Station. It is difficult to assess the impacts of a modified or relocated Lancaster Metrolink Station given the information provided. For the Lancaster Metrolink Station, it is important that the CHSRA construction not negatively impact the convenience of the location, degrade access or circulation, or worsen the customer experience associated with the Station, especially since the station will be improved as funded by a 2020 TIRCP grant award. Any impacts to passenger and transportation circulation or safety must be identified and mitigated.

Metrolink Lancaster Layover and Future Maintenance Facility

793-533 1. The Metrolink Layover Facility appears to be missing from the drawings in the appendix. This Layover Facility is critical to Metrolink's operations on the Antelope Valley Line and its capabilities must be sustained without interruption throughout construction – whether in its current location or if it is relocated to an expanded facility elsewhere.

793-534 2. Due to the service level projections from CHSRA and the associated demands on the infrastructure, CHSRA needs to provide for a larger maintenance facility for Metrolink north of the Metrolink Lancaster Station that preserves the functions of the existing Layover facility and expands its capacity to accommodate the larger fleet associated with expanded service prior to the start of CHSRA operations.

Palmdale Station

793-535 Metrolink is encouraged to see the inclusion of conceptual design principles that facilitate seamless connectivity and ease of transfer within the new joint station (e.g. High Desert Corridor) and to surrounding supportive land uses and developments (Alignment Plans – Vol. 3, Book 4, Ch.2, Section P – Palmdale Subsection Part 2 of 2, pg. 20). The Transportation Section notes that the Palmdale Station will include bike racks, pedestrian connections to existing sidewalks, and bike connections to existing and planned facilities. However, there does not appear to be a discussion of specific customer-facing elements that will be included for the Palmdale Station. CHSRA should consult Metrolink's 2014 Design Criteria Manual for guidance on the construction of customer-facing station amenities where joint joint operations are planned.

Thank you again for providing us with the opportunity to comment on this important transportation project with regional and statewide benefits. We look forward to our continued partnership with California High-Speed Rail Authority as the project moves forward.

Should you have any questions, please feel free to contact me at (213) 452-0468 or via e-mail at McIntyreT@scrra.net or Roderick Diaz at (213) 435-4193 or via e-mail at DiazR@scrra.net.

Sincerely,

Todd McIntyre
Chief Strategy Officer

Cc: Richard Clarke, LA Metro
Arthur Sohikian, North County Transportation Coalition
Justin Fornelli, SCRRA
Eric Hosey, SCRRA
Darrell Maxey, SCRRA
Roderick Diaz, SCRRA
Elizabeth Lun, SCRRA

Response to Submission 793 (Roderick Diaz, Southern California Regional Rail Authority, April 30, 2020)

793-523

The commenter states that agreement between the Authority and other transportation agencies/entities would be necessary on designs and implementation as they progress. The Authority will obtain agreements with impacted right-of-way owners and operators, such as Metro, Union Pacific Railroad (UPRR), and the Southern California Regional Rail Authority.

793-524

As requested by the commenter, the Authority's design will comply with Design Criteria Manual standards for Metrolink Infrastructure design work.

793-525

The commenter observes that coordination with other agencies will be necessary during future design and implementation. The Authority agrees with this comment and is committed to working with stakeholders through design and construction.

793-526

The Authority will provide maintenance access to Metrolink main tracks and signals through realigned limits of tracks as shown in Volume 3 of this Final EIR/EIS.

793-527

The proposed pedestrian underpass will pass underneath the drainage ditch and thus would not create a conflict. Refer to TN-Y1201 in Volume 3 of this Final EIR/EIS for the profile view showing the crossing.

793-528

The turnout referenced by the commenter is Number 20. The Authority has revised the turnout to Number 24 or larger and labeled the turnout on the plan in Volume 3 of this Final EIR/EIS.

793-529

Per the design plans presented in Volume 3 of this Final EIR/EIS, the centerline of Metrolink track to face of column is more than 25 feet.

793-530

Lighting features associated with the HSR will be designed in future design phases. The Authority will comply with the commenter's design standards during the development of the final design plans.

793-531

The requested shift of the alignments would result in complex braiding of the Metrolink and HSR tracks in constrained space, resulting in several costly viaducts and retaining walls. The shift would also require both the HSR and UPRR alignments to be pushed further east, causing additional impacts on property owners east of existing UPRR tracks and would require removal or redesign of Yucca Avenue to maintain access to properties in the area. This design would also require grade separations south of the existing Metrolink Station for HSR lead tracks connecting to the maintenance facility at Ave M which may not be feasible in this short distance. The suggested configuration would also require aerial viaducts through Lancaster, which has previously been opposed by the City of Lancaster. It would also complicate the design of the grade separations in areas where the trains are at different elevations.

Access to the relocated Metrolink station will be provided and coordinated with Metrolink in future design stages.

Response to Submission 793 (Roderick Diaz, Southern California Regional Rail Authority, April 30, 2020) - Continued

793-532

The commenter suggests that not enough information is provided in the Draft EIR/EIS regarding impacts on the Lancaster Metrolink Station. The commenter states it is important that the modifications to the station not negatively impact the convenience of the location, degrade access or circulation, or worsen the customer experience associated with the station.

The project is in the preliminary design stage, which provides sufficient detail for environmental analysis, but without all of the details that will be developed as the project progresses to final design. The Authority fully supports continued coordination and collaboration with Metro, Metrolink, and the City of Lancaster to discuss issues related to the Lancaster Metrolink Station. To this end, coordination meetings with these stakeholders occurred on June 18, 2020, and July 28, 2020. Future coordination meetings are planned with these stakeholders to discuss these issues. The available information regarding the design of Lancaster Metrolink Station can be found in Section 2.4.2.3, Detailed Description, in Chapter 2, Alternatives, and Volume 3 of this Final EIR/EIS.

As described in Section 3.12.6.5, Impact SO #7: Permanent Displacement and Relocation of Community Facilities from Construction, the Lancaster Metrolink Station would not be displaced but would be reconfigured in its current location to accommodate the HSR project. There would be no negative impact on the convenience of the location since the Lancaster Metrolink Station would remain in the same place.

As described in Section 3.2.6.3, Impact TR #2: Circulation and Emergency Access during Construction, in the Lancaster area, Alternatives 1, 2, and 3 would relocate 8 miles of the UPRR and Metrolink tracks along a parallel alignment to make room for the project. To maintain freight and passenger rail service, a “shoofly track” (i.e., a bypass track) would be built prior to rail relocation to allow continuous rail operations. The existing tracks would remain in operation until the shoofly track is constructed to allow for little to no downtime for the UPRR and Metrolink operations. TR-IAMF#9 includes specific requirements to maintain passenger and freight rail operations. Alternative 5 would be located west of the existing UPRR and Metrolink facilities and would therefore not require relocation of the existing Union Pacific Railroad and Metrolink tracks. TR-IAMF#1 through TR-IAMF#5, TR-IAMF#7 through TR-IAMF#9, TR-IAMF#11, and TR-

793-532

IAMF#12 require adherence to specific procedures to avoid and minimize impacts on circulation and access for all transportation modes during the construction period.

793-533

Per coordination with Metrolink, the layover facility is shown on the Volume 3 drawings north of the relocated Metrolink Station at Lancaster Boulevard.

793-534

The Preferred Alternative requires the reconstruction of the Lancaster Metrolink Station. The intent of the Authority is to “replace in kind” and the reconstructed station would have the same configuration as the existing station and any associated layover tracks. The design of the reconstructed Lancaster Metrolink Station has been modified to include the layover tracks that are planned to be built north of the Lancaster Metrolink Station. In regards to the maintenance facility, Chapter 2 of the Final EIR/EIS includes new text describing the Avenue M maintenance facility. The Authority is willing to consider sharing this facility with Metrolink. The Authority will continue to coordinate with Metrolink regarding future maintenance needs during the final design phase.

793-535

The commenter is concerned that the Draft EIR/EIS did not include a discussion of specific customer-facing elements that will be included for the Palmdale Station and suggested that the Authority should consult Metrolink’s 2014 Design Criteria Manual for guidance on the construction of customer-facing station amenities where joint operations are planned. These amenities have not yet been identified because the station design is only at a 15 percent level of completion. Specific customer-facing station amenities would be addressed in final design and the Authority will consult with Metrolink on applicable sections of Metrolink’s manual for areas of the station where any joint operations with Metrolink would occur.