Submission 641 (David Kriske, City of Burbank, June 17, 2020)

Burbank - Los Angeles - RECORD #641 DETAIL

Status :	Action Pending
Record Date :	6/17/2020
Submission Date :	6/17/2020
Interest As :	Local Agency
First Name :	David
Last Name :	Kriske

Stakeholder Comments/Issues :

"Hi Diane,

641-659

Thanks for sending us this email. We've started to review the DEIR/DEIS. Can you help us obtain electronic copies of the technical reports? They are not available on the project website. I'm interested primarily in the transportation report, but other City departments may have other needs.

We are aiming for our City Council to review and approve our draft comment letter at their regular City Council meeting on July 14th as it's the last meeting they have before the close of your comment period.

Thank you,

David"

Response to Submission 641 (David Kriske, City of Burbank, June 17, 2020)

641-659

The commenter requested copies of all publicly available technical reports. The commenter was sent electronic copies of the technical reports on June 19, 2020. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 642 (David Kriske, City of Burbank, June 17, 2020)

Burbank - Los Angeles - RECORD #642 DETAIL

Status :	Action Pending
Record Date :	6/17/2020
Submission Date :	6/17/2020
Interest As :	Local Agency
First Name :	David
Last Name :	Kriske

Stakeholder Comments/Issues :

Hello,

642-660 The City of Burbank is preparing a response to the Draft EIR / EIS for the HSR Burbank to Los Angeles Segment and we require electronic copies of the technical reports listed in the appendix to complete our review of the DEIR/DEIS. How can we receive or download copies of these technical reports?

Thank you,

David

[cid:image002.jpg@01D644A0.29C65C10]DAVID L. KRISKE, AICP
ASST. COMMUNITY DEVELOPMENT DIRECTOR
TRANSPORTATION DIVISION

818-238-5269 | BURBANKCA.GOV | BURBANKBUS.ORG
Working together for a safe, beautiful and thriving community.

Response to Submission 642 (David Kriske, City of Burbank, June 17, 2020)

642-660

The commenter requested copies of all publicly available technical reports. The commenter was sent electronic copies of the technical reports and the Draft EIR/EIS on June 19, 2020. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 723 (Jasmina Zigic, City of Glendale, July 27, 2020)

Burbank - Los Angeles - RECORD #723 DETAIL

Status :	Action Pending
Record Date :	7/27/2020
Submission Date :	7/27/2020
Interest As :	Business and/or Organization
First Name :	Jasmina
Last Name :	Zigic
Attachments :	2020-0716 - COG Land Development Comments for the HSR EIR_EIS.pdf (13 kb)

Stakeholder Comments/Issues :

Good morning Diane,

Attached are the City's Land Development Department comments.

Thank you

723-932 1. The project shall comply with all National Pollutants Discharge Elimination System (NPDES) requirements, including filing of a Notice of Intent with the Los Angeles Regional Water Quality Control Board, and the submittal and certification of plans and details showing preconstruction, during construction, and post-construction Best Management Practices (BMPs) that are integrated into the design of the project. In addition, the applicant shall submit a Low Impact Development (LID) drainage system for review and approval.

723-933 2. The applicant shall enter into a Covenant & Agreement with the City for the replacement, installation, and continued maintenance of all NPDES-related drainage devices on the property and granting inspection rights to the City.

723-934 3. Separate plan submittals shall be required for streets, sewers, and storm drains impacted by the proposed project.

723-935 4. Separate permits shall be required for all work within the public-right-of-way. All applicable construction work shall conform to the SPPWC Manual. The applicant shall bear all fees for the necessary permits and construction inspections for work within the public right-of-way.

723-936 5. All on-site drainage shall be conveyed to the street via cast iron pipes and/or parkway drains from the property line and exiting through the curb.

723-937 6. The applicant shall bear all costs involved in the relocation/reconstruction and/or adjustment to new finished grade of all utilities (underground and overhead) within the public right-of-way. The applicant shall coordinate all such work with the respective utility owners.

723-938 7. For work performed on sanitary sewer pipes, the applicant shall submit a sewage spill prevention plan and/or sewer by-pass plan if necessary.

723-939 8. The applicant shall maintain cleanliness and dust control for the entire duration of the project.

723-940 9. The entire asphalt or concrete roadway pavement within the vicinity of the project site shall be inspected after completion of the project. In the event of damage, as a result of construction-related activities, the applicant may be required to perform additional street repairs, up to the reconstruction of the street pavement.

723-941 10. All existing street appurtenances including traffic striping, utilities, street signs, curb paintings, landscaping, and tree wells within the public right-of-way, that were damaged, removed, or relocated during construction shall be restored to the satisfaction of the Director of Public Works.

Submission 723 (Jasmina Zigic, City of Glendale, July 27, 2020) - Continued

CITY OF GLENDALE
PUBLIC WORKS ENGINEERING
-Land Development Section-

REVIEW OF THE DRAFT EIR/EIS FOR THE GLENDALE PORTION OF THE CALIFORNIA HIGH-SPEED RAIL PROJECT

723-942

1. The project shall comply with all National Pollutants Discharge Elimination System (NPDES) requirements, including filing of a Notice of Intent with the Los Angeles Regional Water Quality Control Board, and the submittal and certification of plans and details showing preconstruction, during construction, and post-construction Best Management Practices (BMPs) that are integrated into the design of the project. In addition, the applicant shall submit a Low Impact Development (LID) drainage system for review and approval.

723-943

2. The applicant shall enter into a Covenant & Agreement with the City for the replacement, installation, and continued maintenance of all NPDES-related drainage devices on the property and granting inspection rights to the City.

723-944

3. Separate plan submittals shall be required for streets, sewers, and storm drains impacted by the proposed project.

723-945

4. Separate permits shall be required for all work within the public-right-of-way. All applicable construction work shall conform to the SPPWC Manual. The applicant shall bear all fees for the necessary permits and construction inspections for work within the public right-of-way.

723-946

5. All on-site drainage shall be conveyed to the street via cast iron pipes and/or parkway drains from the property line and exiting through the curb.

723-947

6. The applicant shall bear all costs involved in the relocation/reconstruction and/or adjustment to new finished grade of all utilities (underground and overhead) within the public right-of-way. The applicant shall coordinate all such work with the respective utility owners.

723-948

7. For work performed on sanitary sewer pipes, the applicant shall submit a sewage spill prevention plan and/or sewer by-pass plan if necessary.

723-949

8. The applicant shall maintain cleanliness and dust control for the entire duration of the project.

723-950

9. The entire asphalt or concrete roadway pavement within the vicinity of the project site shall be inspected after completion of the project. In the event of damage, as a result of construction-related activities, the applicant may be required to perform additional street repairs, up to the reconstruction of the street pavement.

723-951

10. All existing street appurtenances including traffic striping, utilities, street signs, curb paintings, landscaping, and tree wells within the public right-of-way, that were damaged, removed, or relocated during construction shall be restored to the satisfaction of the Director of Public Works.

Page 1 of 1

Response to Submission 723 (Jasmina Zigic, City of Glendale, July 27, 2020)

723-932

The commenter states a Notice of Intent (NOI) and plans showing BMPs should be filed with the Los Angeles Regional Water Quality Control Board. As discussed in Section 3.8.2.2 of Section 3.8, Hydrology and Water Quality, of this Final EIR/EIS, the HSR Build Alternative would comply with all NPDES requirements and Construction General Permit requirements. In compliance with the requirements of the Construction General Permit, the Authority would submit the Permit Registration Documents, including an NOI, to the State Water Resources Control Board (SWRCB). Because the Construction General Permit is a statewide NPDES permit, the NOI is submitted to the SWRCB and not the Los Angeles Regional Water Quality Control Board (RWQCB).

As discussed in Section 3.8.2.2 in Section 3.8, Hydrology and Water Quality, of this Final EIR/EIS, the SWRCB has designated the Authority as a nontraditional permittee under the Phase II Municipal Separate Storm Sewer System (MS4) permit (Order No. 2013-0001-DWQ). Because the Authority has already obtained coverage under the Phase II MS4 Permit, submittal of an NOI is not required for this permit.

Because the Authority is regulated under statewide permits (the Construction General Permit and the Phase II MS4 Permit), the regulating agency would be the SWRCB and not the Los Angeles RWQCB. A SWPPP and construction BMP plans would be submitted to the SWRCB as part of the Permit Registration Documents for coverage under the Construction General Permit. The Phase II MS4 Permit does not require post-construction BMP plans to be submitted to the SWRCB. However, this information would be provided to the SWRCB as part of the 401 permitting process. No revisions to this Final EIR/EIS have been made in response to this comment.

723-933

The commenter states that the Authority should enter into a Covenant &Agreement with the City of Glendale for replacement, installation, and maintenance of NPDES-related drainage devices. BMPs would be located within railroad right-of-way, not city right-of-way, and would be installed, inspected, maintained by the Authority.

As discussed in Section 3.8.2.2 in Section 3.8, Hydrology and Water Quality, of this Final EIR/EIS, the SWRCB designated the Authority as a nontraditional permittee under the Phase II MS4 permit (Order No. 2013-0001-DWQ). The HSR project is not subject to the requirements of the County MS4 Permit; therefore, the Authority, rather than the City of Glendale, would be responsible for compliance with MS4 requirements. As such, a Covenant &Agreement with the City of Glendale for replacement, installation, and maintenance of BMPs would not be required. No revisions to this Final EIR/EIS have been made in response to this comment.

723-934

The commenter states that separate plan submissions would be required for streets, sewers, and storm drains affected by the proposed project. The Authority acknowledges this request and notes that these plans will be when the project advances to the 30% level of design. The current design included in the PEPD (Volume 3.4 of this Final EIR/EIS) has been revised in this Final EIR/EIS to reflect updated utility information per the as-built drawings recently provided by the City of Glendale.

Response to Submission 723 (Jasmina Zigic, City of Glendale, July 27, 2020) - Continued

723-935

The commenter states that separate permits will be required for all work within the City of Glendale public right-of-way and that all applicable construction work will conform to the Standard Plans for Public Works Construction (SPPWC) Manual. Further, the commenter states that the applicant will bear all fees for the necessary permits and construction inspections for work within the City of Glendale right-of-way. The Authority acknowledges the role of the City of Glendale as a Responsible Agency under CEQA. Table 2-21 in Chapter 2 of this Final EIR/EIS has been updated to list the City as a Responsible Agency and any approval actions required from the City such as relinquishments of public right of way. The Authority acknowledges that the City of Glendale 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. Any right of way owned in fee by the City that is temporarily or permanently required for the project will be acquired from the City in accordance with SOCIO-IAMF #2 (refer to Appendix 2- in this Final EIR/EIS).

723-936

The commenter states that all on-site drainage will be conveyed to the street via cast iron pipes and/or parkway drains from the property line and exiting through the curb. The Authority acknowledges this comment; however, it should be noted that the current drainage design is preliminary in nature and indicates where connections would be made, per grading and drainage plans, but does not yet detail connections. As the project is further developed in 30% engineering design pipe material would be defined and would follow the relevant criteria required by the City of Glendale or other applicable agency.

723-937

The commenter states that the Authority as an “applicant” shall bear all costs involved with new utility infrastructure within the public right-of-way and shall coordinate work for the relocation/reconstruction and/or adjustment of utilities with the respective owners. As discussed in Section 3.6.6.3 of this Final EIR/EIS, the Authority would be responsible for assessing the demand for utilities associated with the HSR Build Alternative, as well as for evaluating the required relocation or construction or utility infrastructure during construction. The construction and operation of all utility infrastructure would be under the purview of the utility providers in the project vicinity. However, the Authority would assume responsibility for any costs involved in the construction and operation of expanded utility infrastructure associated with the proposed project and would proactively coordinate all such work with providers. Specifically, the project would comply with the provisions of PUE-IAMF#4, which would require the construction contractor to prepare a technical memorandum to document how construction activities would be coordinated with service providers to avoid unforeseen accidents and service disruptions, and PUE-MM#2, which requires the Authority to contribute its “fair share” of the associated costs and fees for the expansion infrastructure associated with the California State Water Project.

Response to Submission 723 (Jasmina Zigic, City of Glendale, July 27, 2020) - Continued

723-938

The commenter requests that, if necessary, the Authority as an "applicant" prepare a sewage spill prevention plan and/or sewer bypass plan to cover work performed on sanitary sewer pipes. As discussed in Section 3.6.6.3 of this Final EIR/EIS, construction of the HSR Build Alternative has the potential to result in accidents and disruption of services within portions of the sanitary sewer system in the resource study area (RSA). However, due to the established practices of utility identification and notification, the potential for accidents and/or and service disruption is low. As described in PUE-IAMF#4, prior to construction, the contractor would prepare a technical memorandum documenting how construction activities would be coordinated with service providers. The technical memorandum would demonstrate how accidents and interruptions to service would be avoided during construction. Furthermore, as established in Table 3.6-1, Regional and Local Plans and Policies, the HSR Build Alternative would comply with regulations for utilities and sewer services as stipulated in Title 13 of the City of Glendale's Municipal Code. Project adherence to PUE-IAMF#4 and Title 13 of the City of Glendale's Municipal Code during construction, including any work performed on sanitary sewer pipes, sufficiently ensures that accidents, including spills and/or disruptions to service, would be avoided. As such, the preparation of a separate sewage spill presentation plan and/or sewer bypass plan would not be required.

723-939

The commenter states that the Authority should maintain cleanliness and dust control for the duration of the HSR project. As discussed in Section 3.3.6.3 in 3.3, Air Quality and Global Climate Change, of this Final EIR/EIS, under Impact AQ #1, dust will be controlled during construction through compliance with South Coast Air Quality Management District Rule 403, which regulates fugitive dust on construction sites. Specifically, AQ-IAMF#1: Fugitive Dust Emissions requires implementation of a fugitive dust control plan during construction to minimize and control fugitive dust emissions. As part of the fugitive dust plan, the Authority or its contractors would employ measures to minimize fugitive dust emissions by washing vehicles before exiting the construction site, watering unpaved surfaces, limiting vehicle travel speed, and suspending dust-generating activities when wind speed is greater than 25 miles per hour. As also discussed in Section 3.3.6.3 of this Final EIR/EIS, under Impact AQ #11, the amount of fugitive dust suspended beyond 5 feet from the HSR Build Alternative project footprint and non-electrified railroad tracks would be near zero, which would be insignificant due to the low wind speeds generated at this distance from the train.

As discussed in Section 3.8.2.2 in Section 3.8, Hydrology and Water Quality, of this Final EIR/EIS, construction of the HSR Build Alternative would comply with the requirements of the Construction General Permit. In compliance with the requirements of the Construction General Permit, the Authority would implementing a SWPPP and Construction BMPs during construction, as specified in HYD-IAMF#3: Prepare and Implement a Construction Stormwater Pollution Prevention Plan and HMW-IAMF#8: Permit Conditions. The SWPPP would detail the construction BMPs to be implemented, including Good Housekeeping BMPs, which would include maintaining the cleanliness of the project site and wind erosion controls to minimize dust. During operation, the Authority would regularly inspect and maintain the track and right-of-way, which would include trash removal to maintain cleanliness.

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

Response to Submission 723 (Jasmina Zigic, City of Glendale, July 27, 2020) - Continued

723-940

The commenter states that the entire asphalt or concrete roadway pavement within the vicinity of the project site will be inspected after completion of the project. Further, the commenter states that in the event of damage as a result of construction-related activities, the Authority may be required to perform additional street repairs, up to the reconstruction of the street pavement. The Authority's commitment to inspect and repair any damage to public roadways as a result of construction is provided in TR-IAMF#1, Protection of Public Roadways during Construction (refer to Section 3.2.4.2 in this Final EIR/EIS). This IAMF requires the Authority's contractor to provide a photographic survey documenting the condition of the public roadways along truck routes providing access to the construction site and would be responsible for the repair of any structural damage caused by HSR Build Alternative construction.

723-941

The commenter states that all existing street appurtenances within City of Glendale right-of-way that are damaged, removed, or relocated during construction must be restored to the satisfaction of the Director of Public Works. The Authority's commitment to inspect and repair any damage to public roadways (including street appurtenances) as a result of construction is provided in TR-IAMF#1, Protection of Public Roadways during Construction (refer to Section 3.2.4.2 in this Final EIR/EIS). This IAMF requires the Authority's contractor to provide a photographic survey documenting the condition of the public roadways along truck routes providing access to the construction site and would be responsible for the repair of any structural damage caused by HSR Build Alternative construction.

723-942

This comment is a repeat of Comment 723-932. Refer to Response to Comment 723-932 contained in this chapter.

723-943

This comment is a repeat of Comment 723-933. Refer to Response to Comment 723-933 contained in this chapter.

723-944

This comment is a repeat of Comment 723-934. Refer to Response to Comment 723-934 contained in this chapter of this Final EIR/EIS.

723-945

This comment is a repeat of Comment 723-935. Refer to Response to Comment 723-935 contained in this chapter of this Final EIR/EIS.

723-946

This comment is a repeat of Comment 723-936. Refer to Response to Comment 723-936 contained in this chapter of this Final EIR/EIS.

723-947

The commenter states that the Authority should bear all costs involved in the relocation, reconstruction and/or adjustment to new finished grade of all utilities (underground and overhead) within the public right-of-way and that the Authority should coordinate all work with the respective utility owners. Refer to Response to Comment 723-937, contained in this chapter.

723-948

The commenter states that a sewage spill prevention plan and/or sewer by-pass plan should be submitted for work performed on sanitary sewer pipes. Refer to Response to Comment 723-938, contained in this chapter.

723-949

This comment is a repeat of Comment 723-939. Refer to Response to Comment 723-939 contained in this chapter.

Response to Submission 723 (Jasmina Zigic, City of Glendale, July 27, 2020) - Continued

723-950

This comment is a repeat of Comment 723-940. Refer to Response to Comment 723-940 contained in this chapter of this Final EIR/EIS.

723-951

This comment is a repeat of Comment 723-941. Refer to Response to Comment 723-941 contained in this chapter of this Final EIR/EIS.

Submission 918 (Yazdan Emrani, City of Glendale, August 27, 2020)

CITY OF GLENDALE, CALIFORNIA
Public Works
Administration

633 E. Broadway, Suite 209
Glendale, CA 91206-4310
Tel (818) 548-3900 Fax (818) 242-7087
www.glendaleca.gov

August 27, 2020

Brian Kelly, CEO of the California High Speed Authority
Burbank to Los Angeles Draft EIR/EIS Comment
355 S Grand Avenue, Suite 2050,
Los Angeles, CA 90071

Subject: HSR Project - Chevy Chase Drive Street Closure

Dear Mr. Kelly:

Reference is made to the High Speed Rail PEPD Plan review comments received on the City of Glendale's comments during our initial review of the plan set.

918-1882 As indicated in the various department comments, The City of Glendale is opposed to the closure of Chevy Chase Drive and the conversion of it to a cul-de-sac and the installation of an underground pedestrian passageway. Such a closure will create significant disruption to multiple City Department activities, create safety concerns at the underground pedestrian passage, and negatively impact the traffic circulation across both the City of Glendale and City of Los Angeles.

Chevy Chase Drive Street Closure and Conversion to Cul-De-Sac

918-1881 The Glendale Police Department, Glendale Fire Department, and Los Angeles Fire Department are ardently opposed to the closure because it will affect access to and from this entrapped area in the City of Glendale portion as well as the City of Los Angeles portion. Additionally, there is an extensive City utility network located underground, and the impact to those utilities is immeasurable. Furthermore, there are sewer flow measuring stations and a sewer main crossing under the railroad tracks that will be impacted, and relocation/modification may not be feasible or practical. Finally, the proposed cul-de-sac will reduce the front entry to what is already a congested entry point for Public Works Maintenance Services Division trucks and employees, and will severely impact the access gate that cannot be reduced in size. Integrated Waste Division trucks that service the City up to seven days a week will be disrupted and access may be limited which can impair essentials operations.

Underground Pedestrian Passageway

918-1883 In regards to the underground pedestrian passage installation, the City owns six similar types of passages. Due to safety concerns, one has been permanently closed, one has been indefinitely closed off, and the other four constantly receive safety and maintenance complaints. These types of passageways constantly receive crime, loitering, property defacing, littering, and homelessness complaints. The proposed underground passageway will not only be accessible to City of Glendale residents, but also City of Los Angeles residents, therefore, enforcement and maintenance will be difficult and exhaustive. The crossing will also be used by schoolchildren going to and coming from school, and maintaining constant safety for the children will not be practical. Finally, there are sewer flow measuring stations and a sewer main crossing under the railroad tracks that will be impacted, and relocation/modification may not be feasible or practical.

918-1884 With all due respect, your proposal of creating a new grade separation at Goodwin, although only a quarter of a mile away, will not solve the myriad and complexity of infrastructure the City of Glendale owns and operates on Chevy Chase Drive, and will only make the pedestrian passage from one City to another unsafe.

Please reconsider the closure of Chevy Chase Drive and the installation of an underground pedestrian passageway.

If you have any questions, please contact Mr. Edward G. Hitti at (818) 548-3945.

Very truly yours,

Yazdan T. Emrani, P.E.
Director of Public Works

Copy: Diane M. Ricard, Project Manager, California HSR Program
Edward G. Hitti, P.E. Assistant Director of Public Works/City Engineer
Sarkis Oganesyan, P.E., Principal Civil Engineer
Gary H. Edsall, Construction Services Manager
Armen Avazian, P.E., Senior Civil Engineer
Project File

Response to Submission 918 (Yazdan Emrani, City of Glendale, August 27, 2020)

918-1882

The commenter states that the Glendale Police Department, Glendale Fire Department, and Los Angeles Fire Department are opposed to the closure of Chevy Chase Drive and conversion of the street to a cul-de-sac. The Authority held a series of community workshops in Summer 2017 focused exclusively on grade separations in that area, and presented multiple options for Chevy Chase Drive. Ultimately, the option with the fewest residential impacts was chosen for the HSR Build Alternative. The Authority also met with the City of Glendale on December 2, 2020 and on January 13, 2021 to discuss their concerns regarding the closure of Chevy Chase Drive. The Authority reassessed grade-separating Chevy Chase Drive per the City's request, but ultimately did not revise the design, as it would have resulted in similar impacts as presented in the current design. However, the pedestrian undercrossing was changed to be a pedestrian overcrossing to address the City's concerns regarding safety. As Goodwin Avenue would be grade separated, there would not be an impact to circulation across the railroad right-of-way.

918-1881

The commenter expresses their opposition to the closure of Chevy Chase Drive, conversion of the street to a cul-de-sac, and installation of an underground pedestrian passageway. The commenter’s opposition is acknowledged. Refer to Responses to Comments 918-1882 and 918-1883, contained in this chapter of this Final EIR/EIS, for detailed responses to the commenter’s specific comments.

918-1883

The commenter states that the underground pedestrian passage is unsafe and will be difficult to enforce and maintain. The design has been changed to be a pedestrian bridge at Chevy Chase Drive.

918-1884

The commenter requests that the Authority reconsider the closure of Chevy Chase Drive and the installation of the pedestrian passageway. Refer to Responses to Comments 918-1882 and 918-1883 contained in this chapter of this Final EIR/EIS.

Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020)

Burbank - Los Angeles - RECORD #894 DETAIL

Status :	Action Pending
Record Date :	9/3/2020
Submission Date :	9/2/2020
Interest As :	Local Agency
First Name :	Erik
Last Name :	Krause
Attachments :	HSR EIR Comments.pdf (386 kb) rpt_grayson_historic_evaluation_08.2020.pdf (11 mb)

Stakeholder Comments/Issues :

Please accept the attached comments that were inadvertently sent to incorrect email address. I received a message of undeliverable and am now forwarding to correct address.

Sincerely,

[cid:image002.png@01D680FF.6A517F30]<https://www.glendaleca.gov/home>Erik Krause | Deputy Director of Community Development | City of Glendale
633 East Broadway, Room 103 | Glendale, CA | 818-937-8156
ekrause@glendaleca.gov<mailto:ekrause@glendaleca.gov>|
www.glendaleca.gov<http://www.glendaleca.gov/> | Follow us!<https://www.glendaleca.gov/how-do-i-/sign-up-for/social-media-links>

From: Krause, Erik
Sent: Monday, August 31, 2020 6:27 PM
To: 'Burbank.Los.Angeles@hsr.ca.gov' <Burbank.Los.Angeles@hsr.ca.gov>
Subject: HSR - Burbank to Los Angeles Draft EIR/EIS Comment

Please find attached comments on the California High Speed Rail Authority Burbank to Los Angeles Project Section Draft EIR from the City of Glendale.

Sincerely,

[cid:image005.png@01D680FF.6A517F30]<https://www.glendaleca.gov/home>Erik Krause | Deputy Director of Community Development | City of Glendale
633 East Broadway, Room 103 | Glendale, CA | 818-937-8156
ekrause@glendaleca.gov<mailto:ekrause@glendaleca.gov>|
www.glendaleca.gov<http://www.glendaleca.gov/> | Follow us!<https://www.glendaleca.gov/how-do-i-/sign-up-for/social-media-links>

CITY OF GLENDALE, CALIFORNIA
Community Development
Planning

633 E. Broadway, Suite 103
Glendale, CA 91206-4311
Tel. (818) 548-2140 Fax (818) 240-0392
glendaleca.gov

August 31, 2020

Mr. Mark McLoughlin
California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814
Info@hsr.ca.gov

On behalf of the City of Glendale (City), we are providing comments on the California High Speed Rail (HSR) Authority's "California High-Speed Rail Project, Burbank to Los Angeles Project Section Draft EIR." (Project).[1] We understand, GPA Consulting prepared a Historic Architectural Survey Report (Report) for the Project which was completed in March 2019. Using the HSR Section 106 Programmatic Agreement in the Cultural Resources Technical Memorandum #1, GPA defined the Project Area of Potential Effect (APE) based on the November 2018 footprint. Through delineation of the APE, the City of Glendale's Grayson Power Plant (Power Plant) was included within the defined APE.

We recognize the Power Plant had no listings for previous studies and no historical determination under any criteria for either the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). Therefore, the Power Plant was surveyed and recorded by GPA on a DPR-523 Series Form in which they identified the boiler building as being constructed in 1941. GPA recommended

> "…the main building located at 901 Fairmont Avenue[2] meets the criteria for listing in the [NRHP] and the [CRHR] as a locally significant example of a property associated with developmental history of power generation in Glendale under NRHP Criterion A and CRHR Criterion 1, with a period of significance of 1941-1955 (its years of operation prior to the redevelopment of the Grand Central Air Terminal to the Grand Central Industrial Center)."

We understand that, based on this recommendation, the EIR considers the Power Plant to be an historical resource for the purposes of CEQA. GPA's prepared DPR-523 Form included a detailed physical description of the Power Plant, as well as, a short historic context, brief property history, historical photographs, and aerials, limited contemporary photographs from the public right-of-way, and full evaluation per the NRHP and CRHR criteria. Based on their data, GPA considered the Power Plant a California Historical Resource Status Code of 2S2, which represents "Individual property determined eligible for [NRHP] by a consensus through Section 106 process. Listed in the [CRHR]."

On October 9, 2018, the "California High-Speed Rail Authority, Burbank to Los Angeles Project Station Historic Architectural Survey Report" was submitted to the California State Historic Preservation Officer (SHPO) for review. The report was reviewed and revised multiple times, in October 2018, March 2019,

[1] California High-Speed Rail Project, Burbank to Los Angeles Project Section, State Clearing House 2014071073, https://ceqanet.opr.ca.gov/2014071073/2 (accessed 8/29/2020).
[2] The correct address is 800 Air Way.

Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

and on April 3, 2019, for a final SHPO review and concurrence.[3] On May 2, 2019, Kathleen Forrest, acting on behalf of California SHPO Julianne Polanco , concurred with the findings presented in the April 2019 submittal. This included the finding that the Grayson Power Plant is eligible for the NRHP as a locally significant example of a property associated with developmental history of power generation in Glendale under NRHP Criterion A.[4]

In 2016, prior to the High Speed Rail Study, the City of Glendale contracted, Stantec Consulting Services Inc. to prepare a Historic Resources Inventory and Evaluation Report (attached) and DPR-523 Forms for Grayson Power Plant in support of an EIR (Grayson Repowering Project) on the Grayson Power Plant. In 2018, this report was revised to reflect comments received during the public review of the draft EIR and preparation of the final EIR. The report documents the entire property, rather than just the boiler buildings. The 2018 revised report included an introduction with the project location and description, identified APE for the redevelopment project, team qualifications, research and field methods, and an in-depth historic context which covers the history of electricity in California, steam generation in Los Angeles County, Glendale history, and the history and evolution of the power plant. Additionally, the report included an in-depth discussion of the power plant, boiler building, boiler units, cooling towers, switchyards, as well as adjacent and new construction. The extensive written documentation was supported by photographic documentation, crucial for identification of property modifications and included tables chronologically illustrating modifications, citing building information provided by the City and through aerial photography to show change over time. The property includes an evaluation of potential eligibility for the NRHP, CRHR, and the City of Glendale Register based upon full evaluations per the applicable significance criteria.

The 2018 effort recommended the Grayson Power Plant not eligible for listing on the NRHP, CRHR, or the Glendale Register of Historic Resources. The report found the Grayson Power Plant significant under Criteria C and 3; however, it lacks sufficient integrity to convey that significance. The report states:

> "The Grayson Power Plant property as first constructed in 1941 represented the designs of the 1920s, this was soon realized as the plant underwent numerous upgrades and additions through the 1940s, 1950s, 1960s, 1970s, and 1980s to keep pace with the larger, semi-outdoor boiler types that proliferated across California in the 1950s and 1960s. Therefore, Grayson Power Plant is ineligible, under NRHP Criteria A, CRHR Criterion 1 and GRHR as it is not associated with important events in national, state, or city history, or exemplifies significant contributions to the broad cultural, political, economic, social, or historic heritage of the nation, state, or city. Rather, the plant is a continuation of electrical generation themes in a city that had been using electricity for 32 years…. There is no evidence that Grayson Power Plant has any important association with any person or persons who made significant contributions to history at the local, state, or national level. The power plant is not eligible

[3] Brett Rushing, Cultural Resources Program Manager for the California High-Speed Rail Authority to Kathleen Forrest, State Historic Preservation Officer California Office of Historic Preservation re: "High-Speed Rail Program, Burbank to Los Angeles Project Section (FRA_2017_0516_001), request for review and concurrence on revised Historic Architectural Survey Report; Notification of Modification to the Area of Potential Effects," April 3, 2019.
[4] Julianne Polanco, SHPO to Brett Rushing, Cultural Resource Program Manager for the California High-Speed Rail Authority, re: "Historical Architectural Survey Report (HASR) Burbank to Los Angeles Project Section High-Speed Train Project, County of Los Angeles, California," FRA_2017_0516_001, May 2, 2019.

> under NRHP Criteria B, CRHR Criterion 2 or for the GRHR… An article noted its design as earthquake resistant meaning its generators were located outside on a concrete foundation that was resistant to earthquakes with metal coverings to protect it from weather. R.R. Martell noted earthquake engineer consulted on the project stating the generator could be constructed outside the main boiler building. Through time the power plant has withstood earthquakes, as have other power plants with varied designs. This design is important in the greater advancement of power plant designs. Unfortunately, multiple additions and modifications have degraded its integrity and it can no longer convey this significance under NRHP Criteria C or CRHR Criterion 3. As noted, before, the GRHR does not assess integrity. The evolution of earthquake resistant power plant is important to the context of power plant design in California, however it is within the context of Glendale is lessened… The property does not appear likely to yield significant informational associations under NRHP Criteria D, CRHR Criterion 4 or the GRHR as the plant does not yield information important to archaeological pre-history or history of the nation, state, region, or city.[5]

It continues, through

> …numerous building additions and continued evolution of the property there has been a loss of integrity of design, materials, workmanship, and feeling. The property retains integrity of location, setting, and association. The power plant has not moved, the overall setting has remained industrial, and it maintains its association as a power plant. However, numerous alterations have removed its integrity of design to the original plant conceived by Elliott, materials as the building materials, while similar are different in type and massing from the original section. The plant has lost its association of workmanship as the additions have fundamentally altered the physical characteristics of the building as original constructed in 1941 and finally the plant has lost its original feeling. Aside from the numerous building additions continued addition of non-attached boiler units with modern cooling towers and ancillary buildings have removed the original feeling of the property. Therefore, the building has lost integrity coupled with lack of significance the building is not eligible for the NRHP or CRHR under any criterion.[6]

These findings were preliminary and were included in, and frame the discussion in, the City's EIR for the proposed redevelopment Grayson Repowering Project. The EIR concluded that the proposed Project would not result in potentially significant and unavoidable environmental impacts relating to historical resources.

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The City has recognized some data gaps and/or inaccuracies in the GPA preparation; of importance is that the GPA study mischaracterized the period of significance, 1941-1955, as it correlates to the identified historic property. The earliest iteration of the boiler building dates to 1941; however, the building identified by GPA was constructed between 1941 and 1964, with a significant portion of the building constructed between 1959 and 1964. This is relevant because the modifications, would constitute a loss of integrity as most of the building was constructed after 1955.

[5] Stantec Consulting Services (Stantec), Historic Resources Inventory and Evaluation, Grayson Power Plant, City of Glendale, California 2016, (revised 2018).
[6] Stantec, Historic Resources Inventory and Evaluation, Grayson Power Plant (revised 2018).

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The map in the DPR-523 Building, Structure, Object (BSO) Form identifies the "NRHP-Eligible Historic Property Boundary highlighted in white." GPA expands stating "The boundaries of the historic property are limited to the main building. The later additions, such as the modern buildings and infrastructure as well as the replaced steam turbines, do not contribute to the property because they were most likely constructed outside the period of significance, 1941-1955, at which point the Grand Central Air Terminal was redeveloped as the Grand Central Industrial Center. This redevelopment incited major alterations throughout the subject property, bust most noticeable the northern portion of the property which was formerly part of the airfield."

The challenge is, the identified property was constructed between 1941 and 1964, not 1955. The original boiler building which housed Unit 1 was completed in 1941, with Unit 2 added in 1948. In 1953 the building was expanded to accommodate Unit 3, with the design remaining consistent with the original building. Between 1959 and 1964 a multi-story addition on the north end of the building was added to accommodate Unit 4 in 1959 and Unit 5 in 1964. Additions to the property continued with Unit 6 in 1972 and Unit 7 in 1974, they were separate structures constructed north of the main boiler building.

Up until 1959, the Power Plant remained a single-story-structure. In 1959, the addition of Unit 4 and 5 resulted in the much larger and taller structure which remains today. Despite these alterations, GPA inaccurately states that the "main building marked by signage stating 'City of Glendale Public Service Department Steam Electric Generating Plant,' retains integrity of location, materials, design, workmanship, feeling, and association; however, the integrity has been diminished by ongoing development on the site and in the area since the property's construction according to historic aerials maps."

GPA provides that the entire building identified dates from 1941 to 1955 and that it retains the integrity of a building competed in 1955, when in actuality a significant portion of the building dates from 1959 to 1964. These modifications should have been identified as a loss of integrity as the building clearly no longer retains the design, materials, and workmanship of a building constructed between 1941 and 1955. With this, the loss of four of the seven aspects (setting, design, materials, and workmanship), they could have concluded the building was significant under Criteria A and 1, but because of a loss of integrity unable to convey this significance and thusly ineligible for the NRHP and CRHR.

Additionally, the historic context considered in the GPA study does not address the significance of this end date. By choosing 1955, it would suggest that the Power Plant's significance is derived to its association with the Grand Central Air Terminal. However, there is no historic context to support this assertion; the airfield was developed in 1928, whereas the Power Plant was constructed 13 years later. In addition, the report states that it retains all aspects of integrity, despite the Power Plant having undergone multiple additions since the original plan construction in 1941. Most notably, the GPA report does not include the fact that the two story-addition was added in 1959, with ongoing work occurring into 1964. Given this, the structure cannot convey its significance from 1941 through 1955 since the northernmost portion of the building is an addition constructed outside the identified period of significance, 1941-1955.

A detailed review of the 2016 DPR revealed the evaluation conducted GPA does not address several key aspects in developing a proper historic resource evaluation, as outlined in *National Register*

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Bulletin No.15. Primarily, the historic context included in the DPR-523 Form is largely incomplete, and does not provide sufficient information to form the basis for an accurate historical significance evaluation of the property, specifically under Criterion A/1 for the property's association with the Grand Central Air Terminal, nor does it fully support the assertion that construction of a steam plant benefited the region. It does not explain the history of electrical generation in the region or place the construction of the Grayson Power Plant within that context. Second, the GPA report does not provide a well-developed analysis of historical integrity. While the report does provide a cursory list of alternations, which appear to be based upon the included historic aerials, it does not identify or account for many of the modifications to the property, which largely occurred outside the period of significance. This does not adhere to the integrity analysis outlined in N*ational Register Bulletin No.15.*

We ask the HSR Authority, given this new information, to reconsider the previous determination. We ask that, based on the lack of integrity through multiple additions from 1959 through 1964, outside the GPA period of significance, the authority find Grayson Power Plant ineligible for listing on the CRHR and as a historical resource for the purposes of CEQA. Further, we ask the Authority reconsult with SHPO regarding the property's status on the NRHP.

Sincerely,

Erik Krause
Deputy Director of Community Development

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Historic Resource Inventory and Evaluation Grayson Power Plant for City of Glendale, California

~~**Architectural Resource Evaluation of the Grayson Power Plant for City of Glendale, California**~~

Stantec Project No.:
2057123300

Stantec

Prepared for:
The City of Glendale,
Department of Water and Power
141 N. Glendale Avenue
Glendale, California 91206

Prepared by:
Stantec Consulting Services Inc.
3017 Kilgore Road, Suite 100
Rancho Cordova, California
95670-6150

February 15, 2016
(Updated January 2018, August 2020)

Sign-off Sheet

This document entitled ~~Architectural Resource Evaluation of the Grayson Power Plant for City of Glendale, California~~ **Historic Resource Inventory and Evaluation Grayson Power Plant for City of Glendale, California** was prepared by Stantec Consulting Services Inc. ("Stantec") for the account of City of Glendale (the "Client"). Any reliance on this document by any third party is strictly prohibited. The material in it reflects Stantec's professional judgment in light of the scope, schedule and other limitations stated in the document and in the contract between Stantec and the Client. The opinions in the document are based on conditions and information existing at the time the document was published and do not take into account any subsequent changes. In preparing the document, Stantec did not verify information supplied to it by others. Any use which a third party makes of this document is the responsibility of such third party. Such third party agrees that Stantec shall not be responsible for costs or damages of any kind, if any, suffered by it or any other third party as a result of decisions made or actions taken based on this document.

Prepared by _____
(signature)
Corri Jimenez, MS

Prepared by _____
(signature)
Garret Root, MA

Reviewed by _____
(signature)
Michelle Cross, MA, RPA

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Executive Summary

The Grayson Power Plant (Plant) is owned by the City of Glendale and is located in Glendale, Los Angeles County, California. ~~The Plant includes five cooling towers and associated units, as well as a generator designated as Unit 8A, 8B, and 8C, as part of a repowering project; Unit 9, built in 2003, will be one of the remaining structures on the site that will be retained as well as a garage, parking canopies, warehouse, etc., which were more recently constructed.~~ The majority of the structures located at the Plant were completed before 1977, and **are proposed** ~~need~~ to be replaced with new ~~reliable, efficient, and cleaner~~ equipment. The existing generation facilities and their related infrastructure, with the exception of Unit 9, will be replaced with new generation facilities that meet today's electrical and structural standards and are necessary to meet current and future energy loads and support the renewable power generation that Glendale is either building or buying. The net increase in Plant capacity will be less than 50 megawatts; therefore, this project will not fall under the jurisdiction of the California Energy Commission (CEC). The City of Glendale will serve as the lead agency for California Environmental Quality Act (CEQA) compliance.

On August 17-18, 2015, Stantec Consulting Services, Inc. (Stantec) conducted ~~an architectural survey and inventory study~~ **a Historic Resource Inventory and Evaluation** Report on behalf of the City of Glendale Department of Water and Power (GWP) for the proposed **repowering** ~~improvements~~ to the Plant. Based on the historical and comparative information, the Plant is generally reflective of the mid-twentieth century development of Los Angeles County.

~~The Plant was evaluated per the California Register of Historical Resources (CRHR) and Glendale Register of Historic Resources. While the Plant does possess potential significance under the CRHR and Glendale Register of Historic Resources Criterions 1, 2, 3, and 4, a lack of integrity under all aspects of integrity recognized by the CRHR, and implemented for the City of Glendale Register of Historic Resources which is silent on aspects of integrity, undermines the property's ability to convey importance/significance for either the state or local registers. Integrity has been significantly diminished at the site due to continuous improvements such alterations, changes, additions, and demolition of the buildings and structures to respond to and cope with demand and need for efficient energy production for the City of Glendale. Based on the results of this evaluation, Stantec finds the Grayson Power Plant not eligible for the CRHR or City of Glendale Register of Historic Resources under Criterions 1, 2, 3, or 4.~~ **The plant was evaluated per the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and Glendale Register of Historic Resources. While the Plant does possess significance for the NRHP Criteria C and CRHR Criterion III for its engineering, the numerous alterations and expansions have degraded its integrity negating its eligibility. Integrity has been significantly diminished at the site due to continuous improvements such as alterations, changes, additions, and demolition of the buildings and structures. Further, the power plant lacks significance for the Glendale Register of Historic Resources as noted in Section 6 below. Based on the results of this**

evaluation, Stantec finds the Grayson Power Plant not eligible for the NRHP under all criteria, CRHR under all criterion, the City of Glendale Register of Historic Resources, or as a historic resource for the purposed of CEQA.

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Abbreviations

AC	Alternating Current
ADI	Area of Direct Impact
APE	**Area of Potential Effect**
ASCE	American Society of Civil Engineers
CCIC	South Central Coastal Information Center
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CHRIS	California Historical Research Information Centers
CRHR	California Register of Historical Resources
~~CRHR~~	~~California Register of Historical Resources~~
DC	Direct Current
DPR	California Department of Parks and Recreation
EDR	Environmental Data Resources, Inc.
ESA	Environmental Site Assessment
GWP	City of Glendale Department of Water and Power
HVCR	Heating/Ventilating/Cooling/Refrigeration
~~L.W.~~	~~Lauren W. Grayson~~
NEPA	National Environmental Policy Act
NETR	Nationwide Environmental Tile Research, LLC
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
Plant	Grayson Power Plant
RPA	Registered Professional Archaeologist

INTRODUCTION

1.0 INTRODUCTION

1.1 PROJECT LOCATION AND DESCRIPTION

On August 17-18, 2015, Stantec conducted ~~an architectural history survey~~ **a Historic Resource Inventory** and Inventory Study ~~inventory study~~ on behalf of the City of Glendale Department of Water and Power (GWP) for the proposed **repowering** ~~improvements~~ to the Grayson Power Plant (Plant) located in Glendale, Los Angeles County, California. The Plant's project area is in the City of Glendale and is located at 800 Air Way in Glendale, California. The approximately 11-acre property is bounded by the Southern Pacific Railroad tracks and San Fernando Road to the north and northeast, and Fairmont Avenue to the south and southwest. Beyond Fairmont Avenue to the southeast is the Los Angeles River (Figure 1).

The Plant consists of a 1941-47 boiler building with supplemental additions, five cooling towers and units, three gas-fired buildings (Unit 8A, 8B, and 8C), and two switching yards (Kellogg and Glendale) located to the east and southeast (Figures 2-8). Additional auxiliary support structures are also present including maintenance shops, a warehouse, a substation, and other control buildings.

~~The~~ GWP plans to demolish the Plant's boiler building and subsequent additions, five cooling towers, and the generator **units** designated as Unit 1, 2, 3, 4, 5, 8A, 8B~~, and 8C~~ as part of a repowering project (Figure 2). A majority of the buildings located at the Plant, with the exception of Unit 9, which is a simple cycle peaking unit built in 2003, were constructed on or before 1977, and have reached their useful life; therefore, need to be replaced with new reliable, efficient, and cleaner equipment. The repowering of the Plant is necessary to meet current and future energy efficiency for GWP as well as support the renewable power generation that Glendale is either building or buying.

The GWP is proposing to replace all the existing generation facilities and their related infrastructure, with the exception of Unit 9, by removing all existing aboveground and underground equipment and facilities and build a new generation facility. ~~The net increase in Plant capacity will be less than 50 megawatt; therefore, this project will fall under state jurisdiction of the California Energy Commission (CEC), and will not trigger a federal nexus of Section 106 of the National Historic Preservation Act (NHPA). The City of Glendale will serve as the lead state agency for California Environmental Quality Act (CEQA) compliance.~~ **The Project is not considered on "undertaking" subject to Section 106 of the National Historic Preservation Act (NHPA) and is not subject to compliance with the National Environmental Policy Act (NEPA). The Project would require National Pollutant Discharge Elmination System permit coverage for stormwater discharges in accordance with the U.S. Clean Water Act and an air permit in accordance with the U.S. Clean Air Act. The U.S. Environmental Protection Agency delegated authority to issue these permits in the Project to the State Water Resources Control Board and South Coast Air Quality Management District, respectively. As issuance of these permits are**

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subject to State and local regulation administered pursuant to a delegation or approval by a Federal agency, they are not considered to be "undertakings" subject to NHPA Section 106 review. Specifically, the clause in the statutory definition of an "undertaking" which previously included projects and activities subject to State and local regulation administered pursuant to a delegation or approval by a Federal agency was removed from the statute in 2004. The Project is therefore not subject to NHPA Section 106 or NEPA review. The net increase in Plant capacity will be less than 50 megawatts; therefore, this project is not subject to California Energy Commission (CEC), site licensing jurisdiction and the City of Glendale is the California Environmental Quality Act (CEQA) Lead Agency. However, in effort of completeness, this inventory and evaluation addressed the criteria of the NRHP, CRHR and the City of Glendale local criteria. This inventory and evaluation is intended to comply with Section 15064.5(a) (2)-(3) of the California Environmental Quality Act (CEQA). The City of Glendale will serve as the lead state agency for CEQA compliance.

1.2 AREA OF ~~DIRECT IMPACT~~ POTENTIAL EFFECT

The Area of **Potential Effect (APE) is delineated by the property boundary (see Figure 2).** ~~Direct Impact (ADI) is designated as the buildings directly affected by the proposed undertaking and include the Grayson Power Plant Boiler Building, five cooling towers, generator buildings (Unit 8A, 8B, and 8C) and switching yards (see Figure 2).~~

The Project does not include a Federal action or undertaking that is subject to project-specific NEPA or NHPA Section 106 compliance. The Project involves City funding and a discretionary permit from the South Coast Air Quality Management District. As a result, the primary purpose of this evaluation is to determine if there are historic resources located within the APE in consideration of CEQA which includes an evaluation of the historic significance of the Grayson Power Plant for eligibility under the CRHR and City of Glendale Register of Historic Resources. As part of the analysis, a California Department of Parks and Recreation (DPR) 523 Series cultural resource form is included as documentation (see Appendix A). While the Project does not include a Federal undertaking, this evaluation also analyzes the power plant's potential significance to the NRHP. ~~Currently, the project has no federal nexus, and follows CEQA regulations in reviewing resources potentially eligible to the CRHR, as well as the City of Glendale Register of Historic Resources. As part of the analysis, a California Department of Parks and Recreation (DPR) 523 Series cultural resource form is included as documentation (see Appendix A).~~

1.3 DEFINITIONS

Please note that the terms "historic" and "historical resource" are used in this report for the description of architectural features and for evaluative purposes. The term "historic" is used to define something that is 45 years old or older. Buildings and features less than 45 years of age at the Grayson Power Plant were not evaluated for historical importance/significance as a potential "historical resource" **for the purposes of the NHPA of 1966, as amended,** CEQA and the

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City of Glendale Register of Historic Resources. The term "historical resource" is used to describe a property that meets the terms of the definitions in Section 21084.1 of the CEQA Statute and Section 15064.5 of the CEQA Guidelines. "Historical Resources" include properties listed in or formally determined eligible for listing in the California Register of Historical Resources, or listed in an adopted local historic register. The term "local historic register" or "local register of historical resources" means a list of resources that are officially designated or recognized as historically significant by a local government pursuant to resolution or ordinance. "Historical Resources" also includes resources identified as significant in an historical resource survey meeting certain criteria.

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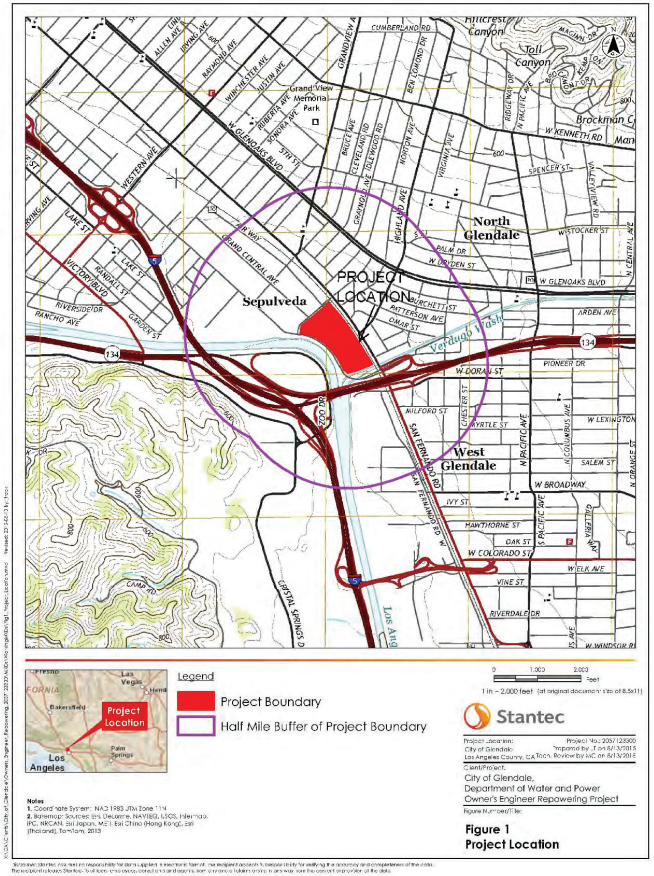

Figure 1 Project Location

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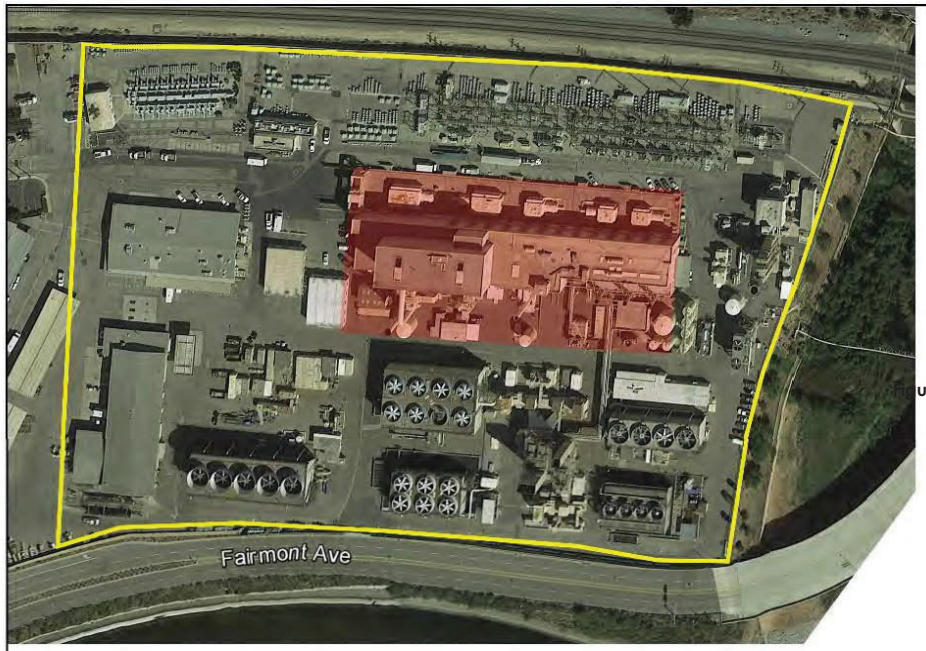

Figure 2 Grayson Power Plant Site Plan Area of Direct Impact

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PHOTOGRAPHS OF PROJECT SITE

ure 3 Grayson Power Plant Boiler Building, View Looking Southwest

Figure 4 Overview of Project Area from Roof of Grayson Boiler Building Looking Northwest

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Figure 5 Overview of Project Area from Roof of Grayson Boiler Building Looking West

Figure 6 Overview of Project Area from Roof of Grayson Boiler Building Looking Southwest

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Figure 7 Overview of Project Area from Roof of Grayson Boiler Building Looking Southwest

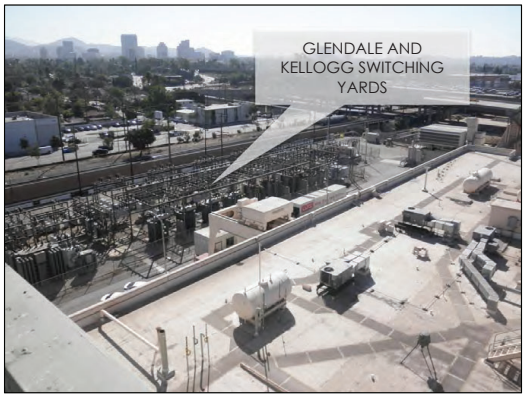

Figure 8 Overview of Project Area from Roof of Grayson Boiler Building Looking Southeast at switching yards

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1.4 CULTURAL RESOURCES PROJECT STAFF QUALIFICATIONS

The GWP contracted with Stantec to undertake an architectural survey and evaluation of the Grayson Power Plant site. The cultural resources team has 20+ years of experience preparing Section 106 of the NHPA, **NEPA** ~~National Environmental Policy Act (NEPA)~~ and CEQA documentations. The evaluation was conducted by the following individuals:

- **Michelle Cross**, MA, **Anthropology with a Specialization in Historical Archaeology (College of William and Mary 2005),** Registered Professional Archaeologist (RPA), is the Cultural Resources Program Manager and U.S. Environmental Services Technical Discipline Lead for Assessment, Permitting, and Compliance for Stantec. She has more than 16 years of experience in cultural resources management and historic preservation. She manages in-house technical staff, supervises technical document preparation, and provides quality control and peer review for cultural resources studies. Her expertise includes archaeological identification, evaluation, and data recovery projects in compliance with local, state, and federal laws and regulations. Michelle served in the capacity of Cultural Resources Manager for the Owner's Engineer Repowering project.

- **Sandra DeChard**, MA **Preservation Studies with a Specialization in Architectural History (Boston University 2000),** is a Senior Architectural Historian and Subject Matter Expert for Architectural History with Stantec. She has 24 years of experience in cultural resources and related fields with extensive experience in Phase I level architectural surveys for transmission line corridors and associated substation and power plant documentation projects. Her experience also includes consultation with local, state, and national review agencies in association with state and federal compliance for cultural resources projects. Sandra is a contributing author to this report.

- **Corri Jimenez**, MS **Historic Preservation (University of Oregon 2000),** is a Senior Architectural Historian with Stantec with over 15 years of experience in architectural history and historic preservation. She has experience working across the United States in the West, Great Basin, and Mid-Atlantic. She also has experience in writing federal Section 106 and CEQA Cultural Resource compliant reports on built environment resources in the state of California. Corri is also a contributing author to this report.

- **Garret Root, MA Public History (California State University, Sacramento 2011), is a Senior Architectural Historian at Stantec with over eight years' experience in architectural history. He has extensive experience in California with specialization in electrical history having worked on over 40 utility specific projects including power plants, electrical and gas transmission, hydroelectric, and nuclear. Garret is a contributing author and editor on this report.**

- **John Terry**, BA **Architecture (Cal Poly 1980),** is a Historical Architect for Stantec with over 35 years of diverse experience in architecture. He also has 26 years of experience as a professor of architectural history at Cosumnes River College. John is a licensed architect

and his professional experiences include consulting and inventory/survey of the built environment. John has also conducted historical research in various repositories including museums and library archives, and has consulted with preservation staff at the municipal level. John conducted the architectural fieldwork for the project as well as the archival research.

- **Meagan Kersten**, MA **Anthropology (California State University, Sacramento 2013),** is a Cultural Resource Specialist with Stantec with over 6 years of archaeological experience, conducting such tasks as completing archaeological surveys, performing cultural resource records searches at the California Historical Research Information Centers (CHRIS), and Native American correspondence. She also has experience in writing federal Section 106 and CEQA Cultural Resource compliant reports. She assists with and manages CEQA projects as well as projects involving federal permitting and funding on a wide array of large- and small-scale infrastructure projects (alternative energy, oil, water, wastewater, linear transportation, and pipeline). Meagan conducted the architectural fieldwork for the project as well as the archival research.

The Stantec Cultural Resources Program Manager and Senior Architectural Historians directing the survey meet the Professional Qualification Standards of the Department of the Interior (48 FR 44738-9). The architectural fieldwork of these investigations conforms to the qualifications specified in the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (Federal Register 48:44716-44742, September 29, 1983), and to the CEQA Statute and Guidelines.

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2.0 METHODS

2.1 RESEARCH METHODS

As part of the research methodology for this study, Stantec staff, Meagan Kersten and John Terry, undertook intensive research at a number of area repositories including the City of Glendale's Central Library, Special Collection Room 2. This research yielded historic background information in the form of newspaper clippings and historic narratives pertaining to the construction of the Grayson Power Plant (Plant) facility and the early development of utilities in Glendale. Research was also conducted by Meagan Kersten and John Terry at the GWP on August 17, 2015. Senior Mechanical Engineer Camilo A. Ruiz Sr. with GWP provided information on the boiler building's construction and timeline of installation of equipment, later turbines, and cooling towers. The GWP provided photographic copies of the original black and white architect renderings of the building.

Stantec Architectural Historian, Corri Jimenez, undertook a desktop review of the buildings located in the Grayson Power Plant (Plant) project area. As part of the desktop analysis Stantec staff reviewed historic topographic maps and aerial imagery and consulted appropriate historical background literature which included review of Environmental Data Resources, Inc. (EDR)'s Environmental Site Assessment (ESA) on the Plant (October 13, 2015). Building permits filed by the Plant and on file at the City of Glendale were also accessed and reviewed. Stantec combined the aerial mapping with the information provided in the building, electrical, mechanical, plumbing/gas and heating/ventilating/cooling/refrigeration permits to inform the assessment of temporal changes at the Plant.

2.1.1 CORRESPONDENCE

In addition to archival repositories, Stantec also contacted the Glendale Historical Society via telephone twice from August 11 through 14, 2015 and Stantec left messages identifying the research for the Grayson Power Plant, planned dates for research in Glendale, and requests for input by phone or email. No response was received. Stantec sent a follow-up email to the Historical Society on December 30, 2015. A response was received from Greg Grammer, President of the Glendale Historical Society via email on December 30, 2015. Mr. Grammer said that he was unaware of any information on the Grayson Power Plant available at the historical society and those generally archival documents, historic photos, etc. are kept in the Special Collection Room at the Glendale Central Library (which Stantec reviewed, see above). On February 2, 2015, Mr. Grammer submitted an article to Stantec which noted that the Plant was the first earthquake retrofitted power plant in the world. This information was incorporated into the report and bibliography.

Email communication was also sent to Historic Preservation Planner, Jay Platt, at the Glendale Community Development Department on December 30, 2015. Mr. Platt responded via email on

January 4, 2016, stating the City of Glendale's ordinance in regard to the Glendale Historic Register is silent to the discussion of architectural integrity. Platt referenced, "most consultants conducting architectural evaluations apply the local register and an integrity analysis, similar to what is applied in both the National and California Registers submitted to the City, which serve as a rationale for not meeting one or more of the criteria for listing on the Glendale Historic Register" (email correspondence from Jay Platt to Michelle Cross of Stantec, January 4, 2016).

~~2.2 EVALUATION METHODS~~

~~Please note structures and buildings constructed after 1970 located in the project area are not considered "historic" for the purposes of this evaluation, because they were less than 45 years old. Construction at the Plant that is less than 45 years old is reflected in the evaluation as changes and modifications to the "historic" setting, character, and architectural design of the original Plant site.~~

2.2 BUILT-ENVIRONMENT FIELD METHODS

The fieldwork portion of the architectural survey for the Plant was conducted on August 17-18, 2015, by Stantec cultural resource staff, John Terry and Meagan Kersten under the direction of Michelle Cross, Cultural Resources Program Manager and Senior Architectural Historian, Sandra DeChard. Site documentation for this project included intensive level survey of the Plant. All built environment resources were documented during the course of the survey. The survey entailed documentation of the main boiler building as well as its associated five cooling towers, and Units 8A **and** 8B**C**, ~~and 8C,~~ directly southwest of the boiler building (see Figure 1).

Digital photographs were taken of the exteriors of all the buildings and structures as well as the boiler building's interior. Detailed notes documenting materials of construction, configuration/layout of the building, existing equipment dating prior to 1970, and changes to the building over time, among other pertinent features were also recorded. Senior Mechanical Engineer at the Plant, Camilo A. Ruiz Sr., provided additional, relevant historical, construction and operational information regarding the Plant. Mr. Ruiz, Sr. accompanied the surveyors during the documentation process.

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3.0 BACKGROUND RESEARCH

3.1 PREVIOUSLY RECORDED RESOURCES

Stantec conducted a record search at the South Central Coastal Information Center (CCIC) of the California Historical Resources Information System (CHRIS) on August 17, 2015 (Records Search File No: 15366.1428). The search determined that 19 historic architectural resources had been previously identified within 0.5-miles of the Grayson Power Plant ADI.

None of the previously recorded architectural resources identified through the CCIC records search are listed on the National Register of Historic Places (NRHP), CRHR, and/or the City of Glendale Register of Historic Resources. No previously recorded architectural resources are located within the current Project area/ADI. A review of the Glendale Register of Historic Resources showed an additional four resources listed within this 0.5-miles ADI, which were not formally recorded or listed per the CHRIS records search. See Appendix B for a copy of the completed records search.

Table 1 Previously Recorded Architectural Resources within 0.5-Mile Radius of the Grayson Power Plant Project Area

Primary #	Resource	Date	Surveyed by	Survey Date
19-175297	Griffith Park, Riverside Drive	1896-1944	C. McAvoy	1994
19-186638	Beauty College, 5245 West San Fernando Road	1937	LSA Associates; K. Crawford	2000; 2012
19-188007	San Fernando Road	1880s to present	J. McKenna	2006
19-190312	Caltrans Bridge No. 53C0226	1939	J. Ostashay; C. Ehringer	2000; 2012
19-190599	General Aircraft Co., 5512-5514 San Fernando Road	1921, 1922, 1948	J. Ostashay	2000
19-190600	Commercial Building, 525 Commercial Street	1942	J. Ostashay	2000
19-190601	ICC C., 521 Commercial Street	1946	J. Ostashay	2000
19-190602	R.A. Fisher Co., 517 Commercial Street	1947, 1954	J. Ostashay	2000

Primary #	Resource	Date	Surveyed by	Survey Date
19-190603	Commercial/Milford Streets Industrial Historic District	1929-1951	J. Ostashay	2000
19-190604	Industrial Building, 801 Milford Street	1929	J. Ostashay	2000
19-190605	Industrial Building, 811 Milford Street	1946	J. Ostashay	2000
19-190606	Industrial Building, 815 Milford Street	1951	J. Ostashay	2000
19-190607	Industrial Building, 514-516 Commercial Street	1946	J. Ostashay	2000
19-190608	Industrial Building, 526 Commercial Street	1947	J. Ostashay	2000
19-190609	Single Family Residence, 862 Grange Street	1937	J. Ostashay	2000
19-190610	Single Family Residence, 866 Grange Street	1937	J. Ostashay	2000
19-190611	Single Family Residence, 870 Grange Street	1946	J. Ostashay	2000
19-190612	Multi-Family Residence, 874 Grange Street	1953	J. Ostashay	2000
19-190897	Los Angeles River Channel, Glendale Narrow Section	1935-1959	D. Slawson	2013

The Glendale Register of Historic Resources was also referenced and four resources were located within a 0.5-mile radius of the project ADI. None of these resources will be impacted by the project.

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Table 2 Glendale Register of Historic Resources Listed Architectural Resources within 0.5-Mile Radius of the Grayson Power Plant Project Area

Name	Address	Date Designated	Date Built	In the ADI?
Grand Central Air Terminal	1310 Air Way	1977	1928	No
Taylor House	1027 Glenwood Road	1977	1873	No
Concord Street Bridge	Concord Street at Verdugo Flood Control	1997	1936	No
Kenilworth Avenue Bridge	Kenilworth Avenue at Verdugo Flood Control	1997	1937	No

3.2 PREVIOUSLY RECORDED REPORTS

There were 13 previously conducted reports and studies identified within 0.5 mile radius from the project area. One report was recorded in the project area, prepared by URS Corporation (Report #LA-06006) (Appendix B). Unit 9, located northeast from the core of the facility of the Plant was previously surveyed by URS Corporation in 2003 (Report #LA-06006), and a cultural resources technical report was completed (see Appendix B). Unit 9 is not within the current project area. URS (2003) did not conduct an architectural evaluation of Unit 9 as part of their cultural resources review and concluded that no known or potential archaeological resources were present in the project area.

Table 3 Reports and Studies within 0.5-Mile Radius of the Grayson Power Plant Project Area

Primary #	Report Name	Author(s)	Affiliation	Date
LA-00845	Prehistoric Cultural Resource Survey and Impact Assessment for a Portion of Griffith Park, Los Angeles, California	Beroza, Barbara	University of California, Los Angeles Archaeological Survey	1980
LA-02210	Archaeological Survey Report and Assessment of the Riverdale Parcel, Griffith Park Los Angeles, California	Frierman, Jay D.	-	1989
LA-02950	Consolidated Report: Cultural Resource Studies for the Proposed Pacific Pipeline Project	Anonymous	Peak & Associates, Inc.	1992
LA-03554	Ucas-304 Survey of Griffith Park, Los Angeles County	Leonard, Nelson N. III	UCAS, Department of Recreation and Parks City of Los Angeles	1968
LA-06006	Cultural Resources Technical Report City of Glendale Water & Power Grayson Unit 9 Project	URS Corporation	-	2003
LA-06738	Highway Project to Construct a New Maintenance Station Under the Ventura Freeway (134) in the City of Glendale, the Doran Street Station at 943 W. Doran Street	Sriro, Adam	Caltrans District 7	2001
LA-06739	Highway Project to Construct a Soundwall Along the Southern Side of Eastbound Route 134 from Concord Street to the Columbus Ave. Pedestrian Overcrossing Within the City of Glendale	Sylvia, Barbara	Caltrans District 7	2001
LA-07263	Cultural Resources Assessment for Cingular Wireless Facility Vy183-01 City of Glendale, California	Kyle, Carolyn E.	Kyle Consulting	2002
LA-07427	Caltrans Historic Bridge Inventory Update: Metal Truss, Movable, and Steel Arch Bridges	McMorris, Christopher	JRP Historical Consulting	2004

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Primary #	Report Name	Author(s)	Affiliation	Date
LA-07840	Negative Archaeological Survey Report for the Beautification and Modernization Along Route 134 from the 134/170 Separation to Shoup Ave Uc, and Along Route 101 From the 101/170 Separation to Concord Street Uc	Sylvia, Barbara	Caltrans District 7	2001
LA-08254	Results of a Phase I Cultural Resources Investigation of the Proposed Los Angeles Department of Water and Power River Supply Conduit, Los Angeles County, California	McKenna, Jeanette A.	McKenna et al.	2004
LA-08255	Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California, Volumes I and II	Arrington, Cindy and Nancy Sikes	SWCA Environmental Consultants, Inc.	2006
LA-08303	Cultural Resources Record Search and Site Visit Results for Royal Street Communications, Llc Candidate LA0057b (Nextel sperry), 4640 Sperry Street, Los Angeles, Los Angeles County, California	Bonner, Wayne H.	Michael Brandman Associates	2007
LA-10642	Preliminary Historical/Archaeological Resources Study, Antelope Valley line Positive Train Control (PTC) Project Southern California Regional Rail Authority, Lancaster to Glendale, Los Angeles County, California	Tang, Bai "Tom"	CRM Tech	2010
LA-10767	Archaeological Monitoring for Cultural Resources the Los Angeles Zoo Parking Lot Project, EW40023F, Phase 1, City of Angeles, Los Angeles County, California	Hogan, Michael	CRM Tech	2010
LA-12526	Santa Clarita Valley Sanitation District Chloride TMDL Facilities Plan Project, Phase I Cultural Resources Assessment	Ehringer, Candace, Ramirez, Katherine, and Vader Michael	ESA	2013

3.0 HISTORIC CONTEXT

3.1 ELECTRICITY IN CALIFORNIA

California's growth in the first half of the twentieth century was due in part to the development of ambitious hydroelectric systems. Long-distance transmission lines linked the power generating mountainous regions with valley farms, coastal centers, and distant cities, allowing a pace and scale of development that was previously unattainable. By the 1920s, this intricate system of hydroelectric facilities, coupled with a growing number of fuel-fired steam plants, fed into long distance transmission lines and a series of substations that transferred and distributed power to locations throughout the state for widespread public use (Root and Herbert 2013: 1; Department of Energy 2015).

In the 1880s, hydroelectric plants provided small-scale electrical development to only isolated companies, such as Standard Consolidated Mining Company in Bodie, CA (Hubbard 2006). However, by the early 1890s AC technological advancement allowed for a more effective means of transmitting electricity over ever-increasing distances. At the outset of this development, the San Antonio Light and Power Company constructed a 13 mile, 5,000-volt, transmission line in 1892, with PG&E constructing the Folsom Hydroelectric Plant's 22 mile, 11,000-volt transmission line in 1895 (Coleman 1952; 138-140). These distances soon gave way to ever larger transmission capability, with Pacific Light and Power Company's Big Creek Hydroelectric Project running at 150 kV by 1913. Several small companies began constructing independent and local power plants and transmission system (JRP 2004).

The development of electrical power was an important factor in California's growth, beginning predominantly in the late-nineteenth century with the evolution of the mining and agricultural industries that spurred development of cities and towns throughout the state. In the early years of electricity's development, two men, Thomas Edison and George Westinghouse, were at the forefront and offered two differing scientific perspectives, regarding the development of electrical power generating, known as Direct Current (DC) versus Alternating Current (AC). While Edison worked on perfecting DC electricity with shorter-range electrical transmission, Westinghouse, worked on transmitting AC electricity on long distances via high voltage transmission lines. Edison's DC current aided by nearby hydroelectric sites revolutionized communities near water sources but was an issue when it came to bringing that power to more urban areas. Not all population centers were near running waters or reservoirs that could be utilized for hydroelectric power. As such, the development of California relied heavily on the transmission of AC electrical lines in generating power (California Energy Commission 2014).

One of the first companies in California to utilize AC electricity was San Antonio Light and Power formed in 1892 by partners Almerian Decker, Cyrus G. Baldwin, and Henry H. Sinclair. The company took advantage of Westinghouse's technology and ran electricity from the power plant to Pomona, 14 miles away. Other larger power generation plants soon followed including

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~~Mill Creek, also designed by Decker, the Folsom Power Plant, designed by James Lightipe, and the Bay Counties Power Company, among others (California Energy Commission 2015).~~

~~During the post-World War II boom in California as residential and industrial development increased, power companies focused on hydroelectric and steam power electrical generation.~~ **Post-World War II California residential and industrial development increased and, power companies responded with hydroelectric and steam power electrical generation.** Steam power generation, however, proved to be more cost effective and municipalities and other companies began to build power generation plants close to population centers utilizing steam turbines to generate power to meet the increased demands for electricity (California Energy Commission 2014, 2015).

3.2 CALIFORNIA STEAM AND ELECTRICITY IN LOS ANGELES COUNTY

As the City of Los Angeles and Los Angeles County experienced rapid growth during the early decades of the twentieth century, the demands for electricity increased dramatically. Prior to 1916, privately owned companies including Southern California Edison and Pacific Power & Light among others generated most of the electrical power in Los Angeles. **British designer Sir Charles Parsons built the first steam turbine-generator in 1884. At the beginning of the twentieth century, engineers designed steam turbines to replace the aging steam engine power plants. Aegidius Elling of Norway is credited in 1903-1904 as being the first to apply the method of injecting steam into the combustion chambers of a gas turbine engine (Termuehlen 2001: 11, 21-28; Beck and Wilson 1996: 30)). The greater Los Angeles region had multiple examples of early fuel fired steam plants including the Banning Street Electrical Plant in Los Angles completed in 1883, Los Angeles Steam Plant No. 1 constructed in 1896, Pacific Light and Power Company's steam plant in Redondo Beach was completed in 1902 and the Glenarm Power Plant constructed in Pasadena in 1906 (Water and Power Associates 2017; City of Pasadena 2015). Within a relatively short time, the technology and capacity of these engines to supply power and electricity grew exponentially. These advances brought electricity to a wide range of industrial and domestic applications; however, the materials needed to withstand the high temperatures of modern turbines were not yet available. Improvements in steam turbines advanced throughout the 1920s and 1930s, leading to a generation of more efficient turbine power plants in the 1950s. During this time, utilities closed or replaced many of the older steam-electric plant generators and constructed more modern units (Myers 1984: 8).**

Steam power generation was part of California's power production throughout the twentieth century, though it declined considerably in the period leading up to World War II as large hydroelectric generating plants came online throughout the state. As early as 1920, hydroelectric power accounted for 69% of all electrical power generated. In 1930, that figure had risen to 76%, and by 1940 hydroelectric sources provided 89% of California's electricity. After World War II this trend reversed, and construction of steam-powered electric generating units grew, accounting for most of the new construction. By 1950, hydroelectricity accounted for only 59% of the total power generated, falling to 27% in 1960. Some new hydroelectric plants

were built during the 1960s, chiefly associated with federal and state water projects, but by 1970, hydroelectric plants accounted for only 31% of all electricity generated in California. A combination of drought, discovery and tapping of natural gas, and lack of new hydroelectric sites led to its decline (Williams 1997: 374).

A persistent drought in California caused the major utilities to question the reliability of systems dependent on abundant water flows, like hydroelectricity. This drought began in 1924 and continued, on and off, for a decade. Concurrently, in the 1920s new natural gas discoveries were made and provided both Northern and Southern California with ample fuel for steam electric power generation. The confluence of these various factors – drought, new steam generator technologies, and new supplies of natural gas – prompted California utilities to begin constructing large steam plants. Steam plants built across the state shared design characteristics including locations close to load centers to reduce transmission costs, easy and efficient access to fuel supplies, near a water supply, on inexpensive land, and on geological formations that could provide a good foundation (Steele 1950: 17-21). By 1920, the cities of Burbank, Pasadena, Los Angeles, and Glendale restructured their original charters to allow municipality owned power generation facilities and distribution lines (Williams 1997:261; Water and Power Associates 2015; Electrical West 1929). In 1928, LA Gas and Electric Corporation constructed the Seal Bach Power Plant and PG&E constructed Station C in Oakland. In 1929, Great Western Power Company built a large steam plant on San Francisco Bay, near the Hunters Point shipyard, fitted with two 55 MW generators. In 1930, fuel-fired steam power plant accounted for more than half of all new plants under construction in California. The fuel-fired steam generation capacity jumped from 1924 at 407,000 kW to over 1 million kW a mere six years later. (Williams 1997: 279-280; City of Pasadena 2015; Burbank Water & Power 2015; Water and Power Associates 2017; Spencer 1961).

In 1916 the City of Los Angeles' Bureau of Power and Light provided the first municipal power distribution. The Bureau's first power generation plant, San Francisquito 1, was energized the following year (Water and Power Associates 2015). ~~Since its construction, two of its 9.4-megawatt units and a 25-megawatt unit were retired in 1981 and 1984, respectively (California Energy Commission 2014).~~ Originally some of Los Angeles' power was supplied by nearby Pasadena, but with the construction of San Francisquito 1, the City of Los Angeles was able to provide Pasadena with electrical power over 34 kV lines. By 1920, the Cities of Burbank, Pasadena, Glendale, and Los Angeles restructured their original charters in order to allow the cities to own power generation facilities and distribute electricity to their residents (Williams 1997:261; Water and Power Associates 2015). After this time, municipalities began to construct larger power generation facilities. The City of Pasadena added to the capacity of the existing steam plant by constructing the Santa Anita and Maryland power substations during the 1930s and the Glenham substation in the early 1950s. In 1941, the City of Burbank added the Magnolia Power Station, the same year as the City of Glendale's Grayson Power Plant (Williams 1997: 280; City of Pasadena 2015; and Burbank Water & Power 2015). **These factors prompted many municipalities, like Glendale to construct power plants of their own.** ~~Since the construction of the power generation facilities in Pasadena and Burbank, Glenham's 45-megawatt unit was~~

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~~retired in 1983, and 25- and 35-megawatt units were retired in 1997. Similarly, a number of Magnolia's units were retired including two 10-megawatt units in 1982/1983 and 10-, 34-, and 25-megawatt units in 2002 (California Energy Commission 2014).~~

~~Of the power facilities listed by the California Energy Commission Energy Almanac (2014) database, 17 were put online prior to 1970 (i.e., 45 year or older) including Glendale's Grayson Power Plant, San Francisquito 2 (1920), San Fernando in Sylmar (1922), and Franklin in Beverly Hills (1921). Others were added to the power grid in the 1950s and 1960s. A majority of these plants, however, were constructed during the 1970s and 1980s to meet the ever-increasing demands for electricity. Additionally, many of power facilities constructed prior to 1970 received major upgrades and renovations to cope with the increasing demands for electricity and support the increase in power generation over time due to growing population in California, as well as urban sprawl. A number of the units at power plants constructed prior to 1970 have been retired as they reached the end of their useful lives and were replaced by newer more efficient power generators (California Energy Commission 2014).~~

3.3 ~~HISTORY OF THE CITY OF GLENDALE~~ EARLY GLENDALE HISTORY

~~3.3.1 EARLY HISTORY~~

~~The early history of Glendale dates to the Spanish era with the formation of Rancho San Rafael, also known as La Zanja, granted to Corporal Jose Maria Verdugo who served as a soldier with Gaspar de Portolá in the 1769 expedition. Spanish Governor Pedro Fages granted the land to Verdugo on October 20, 1784, which was reconfirmed as a land grant in January 21, 1798, and represented 36,403 acres, or eight square leagues (Cowan 1977:87). In 1831, Verdugo died and passed his land grant onto his son and daughter, Julio and Catalina Verdugo. In 1861, Verdugo's children divided the rancho into smaller sections (URS 2003:10). In 1871, Catalina Verdugo died and Rancho San Rafael was ultimately dissolved into 150-acre parcels by the time the U.S. government patented the land grant (GLO #423) to Verdugo's children and their heirs on January 28, 1882 (Perez 1996:95).~~

~~Settlers constructed a schoolhouse and community church in the small town. In 1884, the community called a meeting to name their settlement; they chose "Glen Dale." Ranchers Cameron Thom, Erskin Ross, Benjamin Patterson, Harry J. Crow, Ellis Byram, and George Phelon took interest in the development of the Town of Glendale in 1887, and formally platted it (City of Glendale 2012a; GPA 2007; and URS 2003:10).~~

~~3.3.2 DEVELOPMENT AND THE PACIFIC ELECTRIC RAILROAD~~

By the turn of the twentieth century, the town had already experienced rapid growth **resulting** ~~thanks~~, in part, to the promotional efforts of Edgar D. Goode and Dr. D. W. Hunt and their Glendale Improvement Society in 1902 (City of Glendale 2012a). The growth continued with the opening of the Pacific Electric Railroad in 1904, connecting Glendale to Los Angeles (City of Glendale 2012a). **Glendale incorporated as a city in 1906 which extended approximately 1,480**

acres and by 1910 the population was 2,742 residents (Glendale News Press 1953c; Los Angeles Almanac 2015). Power generation in the City of Glendale began in earnest early when the citizens voted in favor of a $60,000 bond to create the Glendale Public Service Division that purchased the Glendale Light & Power Company generating facility in 1909. By 1910, the system was already strained as power output was a mere 107,000 kilowatts. To supplement, the City purchased additional electricity from Pacific Power & Light, now part of the Southern California Edison Company (Glendale Public Service Commission 1951).

By 1920, Glendale began annexing neighboring communities boasting the city's population to over 13,000 residents (City of Glendale 2012b; Los Angeles Almanac 2015). From 1930 to 1952, Glendale added Whiting Woods and Verdugo Mountains to their city limits a total of 23.6 square miles; two major annexations included New York Avenue (in the La Crescenta area) and Upper Chevy Chase Canyon, and several smaller annexations, which enlarged the City to 29.2 square miles by 1952. By 1950 the population was over 95,700 residents and was considered at the time to be "The Fastest Growing City in America" (City of Glendale 2012b; Los Angeles Almanac 2015). However, by the late 1930s the Glendale Public Service Commission, Electric Division could not keep pace with the population increases (Glendale Public Service Commission 1951). Prior to 1937, Glendale purchased their power from Southern California Edison Company. This supply was supplemented with completion of the Hoover Dam however, continued growth indicated another plant would be necessary to supplement demand [Glendale News-Press 1953a; Glendale Public Services Department 1974).

~~The line went down Brand Boulevard and was constructed on a strip of land owned by Leslie C. Brand, a prominent and notable resident whose efforts continued to bolster the reputation of Glendale as a place of business and the arts (City of Glendale 2012a). Brand's rail line was so great that downtown Glendale shifted west to Brand Boulevard and Broadway from its original center at Glendale and Wilson Avenues to the east. This rail line also helped the community grow by making a direct connection to downtown Los Angeles, and reducing a travel time to less than 20 minutes with trains arriving hourly (GPA 2007). Glendale became a highly accessible community.~~

~~Glendale incorporated as a city in 1906 with a city limits at approximately 1,480 acres and by 1910 the population was 2,742 residents (Glendale News-Press 1953c; Los Angeles Almanac 2015). Power generation in the City of Glendale began in earnest early when the citizens voted in favor of a $60,000 bond to create the Glendale Public Service Division and purchase an electrical generating facility the Glendale Light & Power Company, owned by L. C. Brand for the city in 1909. Brand offered to sell his company to the city for the sum of $23,000 in July 1909, and at that time, had 195 customers (Glendale Public Service Commission 1951). As early as 1910 the power output of 107,000 kilowatts already strained the system and additional electricity was purchased from Pacific Power & Light, now part of the Southern California Edison Company (Glendale Public Service Commission 1951).~~

~~By 1920, Glendale was booming the annexation of neighboring communities extended the city limits to 7,000 acres and a population of over 13,536 residents (City of Glendale 2012b; Los~~

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~~Angeles Almanac 2015). During this time, Glendale experienced a construction boom on the main streets of town; modern commercial buildings and entertainment lined Brand Boulevard and residential neighborhoods of Craftsman bungalows and Spanish Colonial Revival dwellings took over nearby orchards and vineyards.~~

HISTORIC RESOURCE INVENTORY AND EVALUATION GRAYSON POWER PLANT FOR CITY OF GLENDALE, CALIFORNIA
HISTORIC CONTEXT

~~3.3.3 "FASTEST GROWING CITY IN AMERICA"~~

~~Prior to 1937, Glendale purchased their power from Southern California Edison Company, which was the successor to Brand's Pacific Light & Power Company. Much of Los Angeles County and Glendale was powered by the Hoover Dam; however, studies showed it would be necessary for Glendale to build their own plant to supplement demand (Glendale News-Press 1953a; Glendale Public Services Department 1974). By the end of the 1930s, it became apparent that with the increased growth of the city, the power from the Hoover Dam would be inadequate to service Glendale's customers. With the construction of the Hoover Dam, the city also contracted with the federal government of the Bureau of Reclamation to purchase 18,000 kilowatts with an additional contract between the City of Los Angeles and Glendale to transfer the power from the dam to the city (Williams 1997:280). As a result, the city decided to construct their own electrical generation plant, which opened in 1941 (Glendale Public Service Commission 1951; Watts 1954; Perry and Parcher 1981:59-60; and Yamada 2008).~~

~~From 1930 to 1952, Glendale acuminated the 2,160-acre Whiting Woods and Verdugo Mountains, extending the city limits to 15,140 acres or 23.6 square miles. By 1952two major annexations included New York Avenue (in the La Crescenta area) and Upper Chevy Chase Canyon, and several smaller annexations, enlarged the city to 29.2 square miles. 1950 saw the population at over 95,700 residents, Glendale was considered at the time to be "the fastest growing city in America" (City of Glendale 2012b; Los Angeles Almanac 2015). According to the Glendale Public Service Commission, the constant population growth was causing a compounded problem. The Electric Division claimed they were only able to service approximately 100,000 residents at a favorable rate (Glendale Public Service Commission 1951).~~

~~Between 1960 and 1970 the population of Glendale grew from over 119,440 residents to 132,660. Growth slowed during the 1970s; however, with the surge in residential development in the late 1970s and early 1980s, the population soared to 180,000. By 2015 the population of Glendale is estimated to be approximately 207,000 residents.~~

3.4 ~~GRAYSON POWER PLANT HISTORY~~ GLENDALE STEAM ELECTRIC GENERATING PLANT

~~The Los Angeles Times recorded in June 1940 the Glendale power plant would be, at the cost of $1.8 million, the world's first earthquake-proof plant. The article records the unique features of the plant as a "huge turbo-generator on an uncovered open deck" with a "special metal cover" to protect the generator from "rain and dust" (Los Angeles Times 1940). The article records the building as a "shell built of light steel and stucco filler walls, which will hide the more or less unsightly appearance of boilers" and had a "22-foot deep basement" for its equipment (Los Angeles Times 1940).~~

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~~Architect Daniel A. Elliott designed the original 1941 boiler building, referred as the "Glendale Power & Light" or "Steam Electric Generating Plant" in early rendering drawings (see Figures 9-13). The boiler building was architecturally designed in the Streamline Moderne style and contained a generator in the same style, manufactured by the Combustion Engineering Company Inc., New York, as well as two boilers (Boilers 1A and 1B). Elliott is well known in designing the Burbank Water & Power administrative building in 1949, which is one of his best works (LA Conservancy 2015). The plant was renamed the "L.W. Grayson Steam-Electric Generating Station" on October 10, 1972 after its General Manager and Chief Engineer, Lauren W. (L.W.) Grayson (City of Glendale 1972).~~

Building off the success of the 1920s and early-1930s and seeing the impending probability of an outbreak of hostilities, utilities and municipalities began constructing a series of fuel-fired steam plants across California. Northern California PG&E began construction of three, fuel-fired steam - plants located adjacent to oil refineries, in 1939. Southern California municipalities, in Burbank, Glendale (study property), and San Diego each completed power plants, in 1941 (Williams 1997: 279-280). The City of Glendale began planning for construction of a new power plant in 1937. However, the City's plans were met with immediate opposition by Los Angeles Bureau of Power and Light and the Southern California Edison Company, both which supplied the City with electricity and stated they had surplus electricity for sale (Los Angeles Times 1938). Despite these assertions, the City, led by industrial entities pushed forward with their plan for construction of a $1.8 million-dollar plant. The City secured the services of Architect Daniel A. Elliott to design the power plant, referred as the "Glendale Power & Light" or "Steam Electric Generating Plant" (Figure 9-13) (LA Conservancy 2015).

HISTORIC RESOURCE INVENTORY AND EVALUATION GRAYSON POWER PLANT FOR CITY OF GLENDALE, CALIFORNIA

HISTORIC CONTEXT

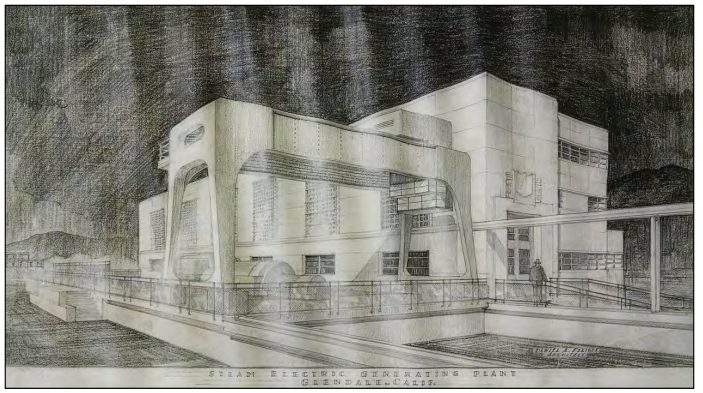

Figure 9 Architectural Drawings of the Original Design for Glendale's Steam Power Plant Drawn by Daniel A. Elliott (Collection of City of Glendale Water & Power)

Figure 10 Architectural Drawings of Alternate Designs for Glendale's Steam Power Plant Drawn by Daniel A. Elliott (Collection of City of Glendale Water & Power)

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Figure 11 Architectural Drawings of Alternate Designs for Glendale's Steam Power Plant Drawn by Daniel Elliott (Collection of City of Glendale Water & Power)

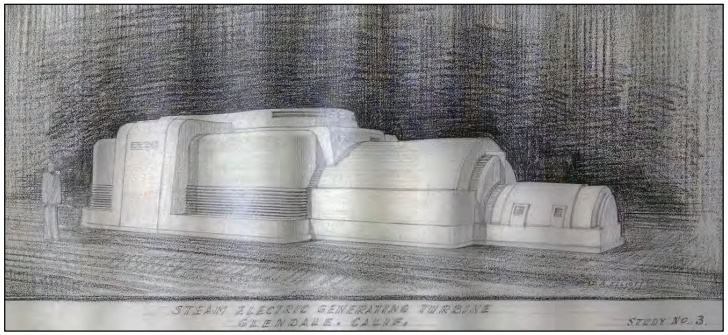

Figure 12 Architectural Drawings of the Original Design Turbine Covers for Glendale's Steam Power Plant Drawn by Daniel Elliott (Collection of City of Glendale Water & Power)

HISTORIC RESOURCE INVENTORY AND EVALUATION GRAYSON POWER PLANT FOR CITY OF GLENDALE, CALIFORNIA

HISTORIC CONTEXT

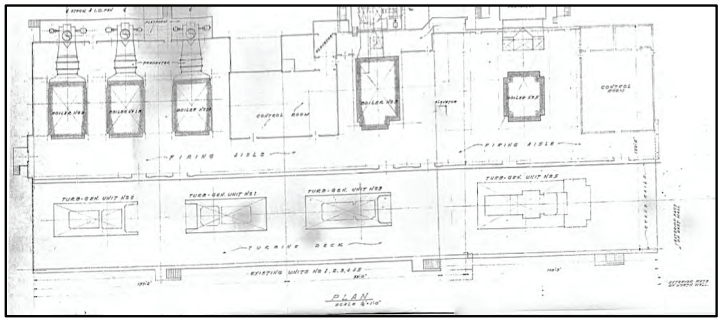

Figure 13 Architectural Floor Plan at the time of Unit 4 construction. Glendale's Steam Power Plant Drawn by Daniel Elliott (Collection of City of Glendale Water & Power)

Elliott designed the boiler structure in the Streamline Moderne-style, built to house two boilers (Boilers 1A and 1B). Located outside on a full length concrete pedestal were the generators, manufactured by Combustion Engineering Company Inc., New York and with Streamline Moderne detailing. Elliott was born in Las Vegas, New Mexico in 1898. He attended University of California at Berkley, earning an architecture degree in 1925. From 1925 through 1932 he served as a designer at the Los Angeles architecture firm of Gilbert Stanley Underwood before getting his architecture license and becoming an architect at the Metropolitan Water District of Southern California. He remained at the water district from 1932 through 1939. During World War II he worked at Hoover and Montgomery, a firm that specialized in water-related construction projects. Following the end of the war he formed his own architecture practice, one he maintained until his retirement in 1962. Principle examples of his work are water focused designs most notably the Colorado River Aqueduct Pumping Plants and F.E. Weymouth Memorial Water Softening and Filtration Plant completed in 1939, and the Burbank Water & Power administrative building in 1949 (LA Conservancy 2015; AIA 1956: 155).

Elliott's original design laid claim to being the world's first earthquake-proof plant, with a 22-foot-deep concrete basement, turbo-generator on an uncovered open deck with a metal covering over the generator from to protect from inclement weather, and a building shell built of light steel and stucco filler walls (Los Angeles Times 1940). At its start-up in 1941, the plant was capable of producing 20,000 kilowatts of power. **The City had already secured funding for a second unit set ot be added in 1945 (Los Angeles Time 1941;** Glendale Public Service Commission 1951). To meet increasing demands for electricity, a second unit was added in 1947, which included an additional 20,000-kilowatt generator and single boiler increasing the plant's combined kilowatt

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capacity of 40,000 kilowatts (Glendale News Press 1953e; Glendale News Press 1953f; and Glendale Public Service Commission 1951).

As demand continued to increase, plans for a third unit were added in 1953 that included an addition to the boiler building on its north end; the third unit at the plant was completed at a cost of over $3 million (see Figure 9, Figure 12). ~~Unit 3, constructed to the north of the original building, included a new 20,000 kilowatt steam turbo generator, which provided an additional 20,000 kilowatts of power to meet the ever increasing demands for electricity in the Glendale area (Glendale News-Press 1953d).~~ The integral furnace boiler and superheater steam boiler unit installed during the construction of the third unit was manufactured by the Babcock & Wilcox Company and the turbine generator by General Electric. The company of Foster & Wheeler constructed the cooling tower and provided the condenser for Unit 3. The structural steel used in the construction of this portion of the building was fabricated by the Kyle Steel Construction Company. Unit 3 also utilized advances in engineering and technology, which allowed for greater steam pressure than Units 1 and 2, which in turn allows for greater operating efficiency. The turbines for Unit 3 are located outside the main building under a removable housing (Glendale News Press 1953e).

HISTORIC RESOURCE INVENTORY AND EVALUATION GRAYSON POWER PLANT FOR CITY OF GLENDALE, CALIFORNIA

HISTORIC CONTEXT

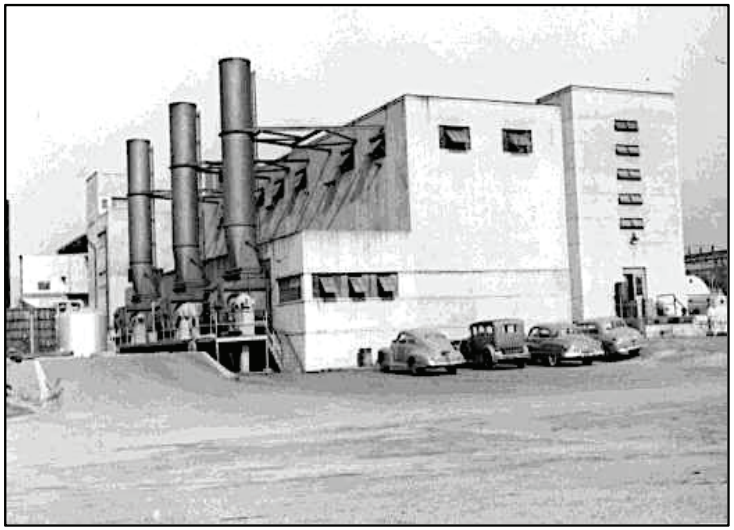

Figure 14 Grayson Power Plant c. 1950 (Collection of the City of Glendale Water and Power)

Between 1953-54, the plant generated a total of 122,649,440 kilowatts per hour which was supplemented by electricity generated at Hoover Dam, supplied all the power needed for the City (Glendale Public Service Commission 1951). Five more units were constructed after 1953 and included Unit 4 (1959), Unit 5 (1964), Unit 6 (1972), and Unit 7 (1974). The boiler for Unit 4 was manufactured by Riley Stoker Corporation; Unit 6 was manufactured by General Electric; and Unit 7 by the Curtiss-Wright Company. Units 1 through 3 maintain Elliott's the style aesthetics, however the structure's shape and detailing shifts with the addition of Units 4 and 5, to a significantly taller, less detailed utilitarian structure located north of the original 1941 boiler structure. As the building was expanded north, lower level fenestration of the first three phases was repeated but without the vertical glass block panels. Little significant architectural detail was included in Unit 4 & Unit 5's building expansion. In 1972, The plant was renamed the "L.W. Grayson Steam-Electric Generating Station" after the City of Glendale General Manager and Chief Engineer, Lauren W. (L.W.) Grayson who at the time was the longest serving employee. Grayson accepted a position at the City of Glendale in 1951 (City of Glendale 1972; Glendale News-Press 1972). His most notable achievement was in bringing power to Southern California through the Pacific Northwest Intertie (Glendale News-Press 1972).

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~~Between 1953-54, the plant generated a total of 122,649,440 kilowatts per hour in addition to the power it received from Hoover Dam which it then supplied to the city (Glendale Public Service Commission 1951). The electricity serviced the street lighting and the underground system on Royal and Brand Boulevards by supporting underground facilities in the business and residential districts. L.W. Grayson created a 7-year light program in improving utilitarian lighting in the city as well as upgrades to the 1909 Pacific Electric Railroad that ran into Los Angeles (Glendale News Press 1953b)~~

~~Five more units were constructed after 1953 and included Unit 4 (1959), Unit 5 (1964), Unit 6 (1972), and Unit 7 (1974). The boiler for Unit 4 was manufactured by Riley Stoker Corporation; Unit 6 was manufactured by General Electric; and Unit 7 by the Curtiss-Wright Company. The architectural character of the original phases (Units 1-3) are consistent with the original design intent of Architect Daniel A. Elliott from 1941. The addition of Units 4 & Unit 5 saw a change away from the earlier Streamline Moderne design, to a significantly taller, less detailed utilitarian structure that we see to the north (Figure 3, taller section center & right of photograph). As the building was expanded north the lower level of the first three phases was repeated but without the vertical glass block panels. Little significant architectural detail was included in Unit 4 and Unit 5's building expansion. In total it looks as though four additions were made to the original Unit 1 building of 1941.~~

Unit 8 (Unit 8A **and**, 8B~~, and 8C~~) was constructed in 1977 and was one of the last to be installed at the power plant and the most efficient of the ~~group~~ **units** while producing fewer emissions than the earlier generators at the plant (Cook 1977). **Initially, it was called a "combined cycle repowering unit" in producing more energy and fewer emissions with conventional units that provide better combustion controls and higher efficiency (Cook 1977).** The new system cost $20 million dollars and at the time, lessened air pollution (Ralph 1977).

~~Further environmental improvements to the plant resulted from the construction of a phosphate removal and treatment plant in 1978. The treatment plant was connected to the steam plant by a pipeline, which directly pumps the reclaimed water into the Grayson Power Plant's cooling towers (Rees 1978). In addition, since 1994 the plant has utilized methane gas from the Scholl Canyon Landfill mixed with natural gas to generate power in Units 3, 4, and 5 (Scholl Canyon Landfill 2015).~~

Continuous improvements in efficiency and power generation capacity have been one of the priorities at the Grayson Power Plant throughout its history including the construction of a new 50 megawatt power generator was completed in 2004, at a cost of $33.5 million dollars, replaced two of the older, outdated units. The new structure consists of a generator, a gas turbine and compressor, and an emissions control tower to filter out pollutants throughout the system. The generator runs entirely on computers and operates during peak hours (Moskowitz 2004).

In July 2010, a fire at Cooling Tower 3 caused severe damage to the structure (Wells 2010). The fire rendered the structure beyond repair and the structure was replaced (City of Glendale 2010). Repairs to other portions of the plant included the replacement of the superheater tubes in Boiler

No. 4 in 2001, among other updates (City of Glendale 2011). According to the City of Glendale, California Report to the City Council in April 2014, the boilers for Units 1 and 2 have been mothballed (City of Glendale 2014).

~~In July 2010, Cooling Tower 3 caught fire which caused severe damage to the structure, although no effect to service and no damage to any of the other cooling towers or structures on the site occurred (Wells 2010). Reports indicated that a spark or heat from the electrical lines ignited the wooden roof deck. The fire rendered the structure beyond repair and the structure was replaced (City of Glendale 2010). Repairs to other portions of the plant included the replacement of the superheater tubes in Boiler No. 4 in 2001, wall tubes in Boiler No. 4 in 2011, an upgrade of the burner management and boiler control systems, also in Unit 4 in 2011, among other updates (City of Glendale 2011). According to the City of Glendale, California Report to the City Council in April 2014, the boilers for Units 1 and 2 have been mothballed (City of Glendale 2014).~~

In 2015, the Glendale City Council commissioned plans for upgrading the Grayson Power Plant facility to make the plant more efficient, reliable and cost effective. According to the June article in the Glendale News-Press, seven of the eight turbines would be decommissioned and replaced by 4 more efficient turbines, which would be able to produce power more quickly (Mikailian 2015). Currently the power plant generates approximately 18% of the power needed for the City of Glendale with the remaining power coming from a combination of both local and remote generation (owned and leased), coupled with spot market purchases from a variety of suppliers throughout the Western United States (Mikailian 2015). **For a full history, please refer to the DPR-523 in Appendix A.**

~~3.5 LAUREN W. (L.W.) GRAYSON~~

~~Lauren W. (L.W.) Grayson was born in Boone, Iowa, in 1907, he moved with his family to Riverside, California in 1919 (Glendale News-Press 1972). In 1925, he began to work for the Utilities Department of the City of Riverside (Perry and Parcher 1981:59). In 1942, he was appointed superintendent of public utilities in Riverside, and in 1950, was appointed general manager and chief engineer. In 1951, he accepted a position in the City of Glendale, instructed to bring power to Southern California and Glendale (Glendale News-Press 1972). Grayson never received an engineering degree; however he was accepted as an expert in the field and a member of the American Society of Civil Engineers (ASCE) and was president of the California Municipal Utilities Association and American Water Works Association (Perry and Parcher 1981:59). Besides all these endeavors, he was instrumental in bringing power to Southern California through the Pacific Northwest Intertie (Glendale News-Press 1972).~~

~~In addition to his public service, he was a member of the Grandview Presbyterian Church, Kiwanis Club of Glendale, and Glendale Chamber of Commerce (Glendale News-Press 1972). He also served as a board director for the Glendale YMCA and was active in the Red Cross, Glendale AID and Community Chest (Glendale News-Press 1972).~~

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~~Grayson received a George Warren Fuller Award in 1958 for outstanding achievement in the field of waterworks and a life membership in the American Water Works Association, which was the highest honor in the association (Perry and Parcher 1981:59). He retired in July 1970 (Perry and Parcher 1981:59)~~

~~Grayson died in Oak Harbor, Washington, at the age of 65 on May 22, 1972, and at the time was City of Glendale's top public service employee, working in the city for 19 years (Perry and Parcher 1981:59; Glendale News-Press 1972).~~

4.0 SITE ANALYSIS DESCRIPTION

4.1 HISTORIC AERIALS ANALYSIS

The following discussion highlights changes over time at the Plant through the review of aerial imagery from 1952 to 2012. Please refer to **Figures** ~~Figure~~ 15a-c to reference the analysis and highlighted changes discussed below.

The earliest aerial photograph found of the Plant site dates to 1952 (Figure 15, Aerial 1). The site in 1952 represented the original 1941 boiler building, which shows an addition to the northeast. The Glendale Switching Yard is located to the northeast of the boiler building and Cooling Tower #1 and Cooling Tower #2 are located southwest from the boiler building. Cooling Towers #1 and #2 are rectangular buildings, each with two parallel rows of six cooling flues. Between the boiler building and Cooling Tower #1 are numerous auxiliary structures of unknown function. On the site contains other long rectangular buildings, which may have been associated with the railroad. No other structures were located on the site besides these four resources.

The Plant site expanded between 1952 and 1964 (Figure 15, Aerial 2). According to Aerial 2, the boiler building's addition was finalized, and Unit #5 was completed on its northwest end. The Glendale Switching Yard was expanded, and the Kellogg Switching Yard was constructed next to a large, oval-shaped parking lot. Numerous new structures were constructed by the 1964 to the northwest, including Cooling Tower #3, Cooling Tower #4, and Cooling Tower #5, which have a diversity of cooling flues: Cooling Tower #3 has six flues in two bays, Cooling **Tower** #4 has eight flues in two bays, and Cooling Tower #5 has a row of five flues. In addition to these three cooling towers, a rectangular-shed building, a rectangular garage with two add-ons, and an L-shaped warehouse are located north of the towers as gabled buildings. No changes are evident in Cooling Tower #1 and Cooling Tower #2; however, there are numerous round-shaped structures located on the boiler building's northwest corner.

The Plant site between 1964 and 1977 changed significantly (Figure 15, Aerial 3). Cooling tower #1 was demolished and replaced; the cooling building changed from a rectangular building with two parallel rows of six flues to four flues with a utility structure addition to the northwest. A chemical storage tank was added between the cooling buildings, and a second chemical storage was added to the boiler building's west elevation. Unit #6 was constructed adjacent to the chemical storage at its northwest corner. In addition, Units #8A, #8B~~, and #8C~~ were constructed by 1977 in the middle of the site, between Cooling Towers #1, #2, #3, and #4. A 120-feet diameter fuel tank was constructed near the southwest corner of the boiler building. The Kellogg Switching Yard was expanded to the northwest with the removal of half of the oval-shaped parking lot. In addition, three parking sheds are constructed between three existing buildings at the northwest end of the site. No visual changes are apparent on Cooling Tower #2, Cooling Tower #3, Cooling Tower #4, and Cooling Tower #5, as well as the shed building, garage, and warehouse.

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The Plant site between 1977 and 1979 had little changes (Figure 15, Aerial 4). Two pump houses were constructed east of Cooling Tower #5 and a small addition was added on to the boiler building's west elevation and oval tanks and auxiliary structures were added to its corner. No other changes are visual on the 1979 aerial photograph.

The Plant site between 1979 and 1981 had one significant change completed, which was the demolition and replacement of Cooling Tower #2 (Figure 15, Aerial 5). Historically in the 1952 through 1979 aerials, Cooling Tower #2 represented a rectangular building with six cooling flues, which was rebuilt as a four flue cooling tower.

The Plant site between 1981 and 1989 was little changed (Figure 15, Aerial 6). A new switching yard or station is added north of the warehouse. The Plant site between 1989 and 1994 had no changes (Figure 15, Aerial 7). The Plant site between 1994 and 2002 had one change to the site, which was the removal of the 1972 120' diameter fuel tank, the future Unit #9 site (Figure 15, Aerial 8).

The Plant site between 2002 and 2005 evolved with additional changes (Figure 15, Aerial 9). Unit #9 was constructed on the 1972 fuel tank site, which was physically finished in 2003 (URS Corporation 2003). In addition, the Kellogg Switching Yard appears to have continued to expand again to the north, replacing a parking lot. A building to the north of this switching yard was demolished, and a new building was constructed. Unit #6 was demolished, and a utilities building was constructed.

The Plant site between 2005 and 2009 underwent a few changes that included the demolition of the building which was newly constructed between 2002-2005, and was replaced by a parking lot (Figure 15, Aerial 10). A second building was demolished near the boiler building's west elevation. The most significant change in these years is the construction of the Fairmont Avenue—the on-ramp visibly started off the south corner of the plant's site. Off Fairmont Avenue, the front entrance to the plant site was added off this avenue, fronting the riverside of the property.

The Plant site between 2009 and 2011 was little changed, the most significant change was the relocation of the main entrance from Air Way has been to Fairmont Avenue (Figure 15, Aerial 11). With the entrance changed, a parking lot was constructed, and an on-site parking shed was removed. Near the boiler, utility type buildings were constructed on its west corner.

The Plant site between 2011 and 2012 included a new structure northwest of the boiler building, on the site of Unit #6 as well as the construction of a training center on an existing parking lot (Figure 15, Aerial 12).

In conclusion, the only pre-1970 structures that appear to retain their original footprint at the Plant are the boiler building, Cooling Tower #3, Cooling Tower #4, Cooling Tower #5, warehouse, shed building, garage and two parking sheds. The only pre-1970 structure that remains intact with no modification or alteration is Cooling Tower #5.

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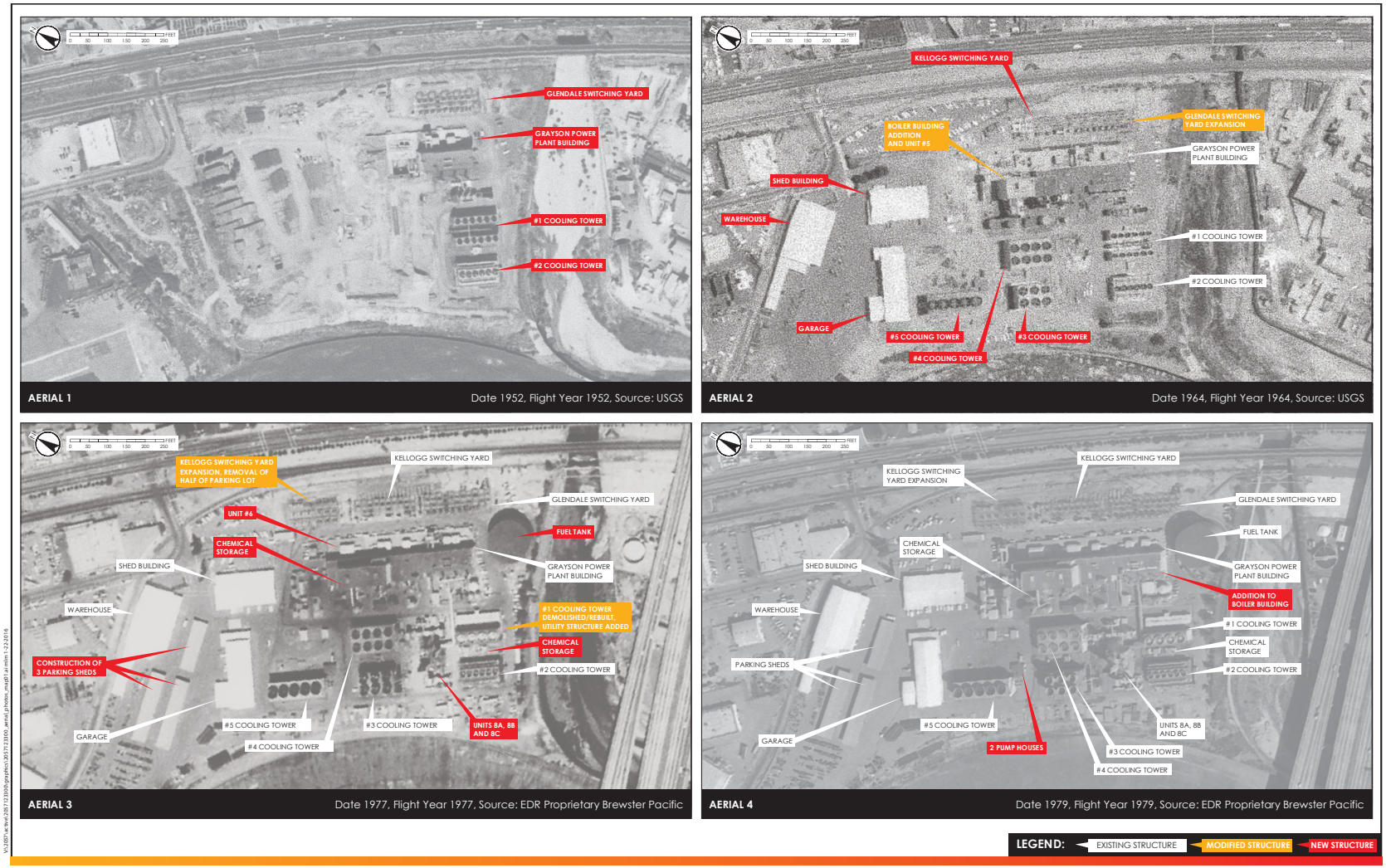

Stantec

Figure 15
Grayson Power Plant Aerial Photographs 1952-1979

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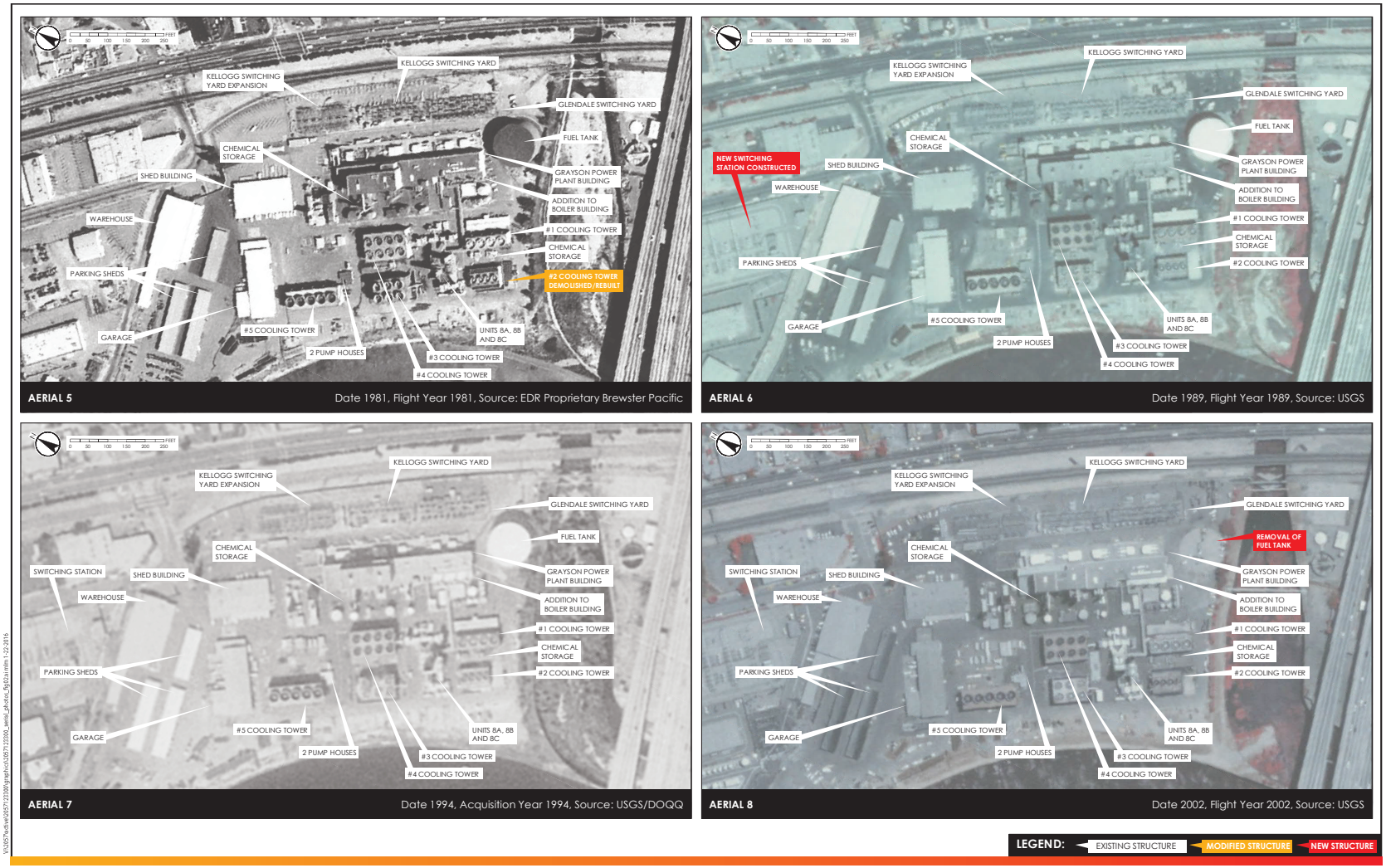

Stantec

Figure 15
Grayson Power Plant Aerial Photographs 1981-2002

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Stantec

Figure 15
Grayson Power Plant Aerial Photographs 2005-2012

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~~4.2 GRAYSON POWER PLANT BUILDING PERMITS~~

~~The City of Glendale provided permits for the Plant that included building/demolition, electrical, mechanical, plumbing/gas, as well as heating/ventilating/cooling/refrigeration (HVCR) permits. In total over 75 permits were reviewed by Stantec. Some of the permits did not provide specific enough information about improvements to the Plant's structure. In addition, many of the sketches submitted on the permits are unclear in terms of their location at the Plant. Table 4 below summarizes 57 of the 74 permits reviewed that contain relevant information in regard to changes on the Plant. These changes include seismic improvements, construction of specific structures and buildings, and demolition of structures on the site. Thirty-nine permits are building or demolition permits, 11 permits were electrical, three mechanical, and four are HVCR permits. Some of the projects associated with these permits are visible in the aerials (see Section 5.1 above) whereas other changes are too minute or represented changes to the interior of on the Plant not visible per the aerial analysis. Overall, the building permits articulate the numerous additions and alterations to buildings or demolition of structures on the Plant site over time.~~

~~Table 4 City of Glendale Building Permits~~

~~Permit No.~~	~~Date~~	~~Permit Type~~	~~Project Description~~
~~45068~~	~~March 5, 1963~~	~~Building Permit~~	~~Constructed a substructure to 1st floor for Unit #5 as an addition that is 100 foot long and 122 foot wide. A concrete superstructure with a steel roof frame with plaster and composition.~~
~~59452~~	~~January 17, 1964~~	~~Building Permit~~	~~Constructed a new concrete cooling tower basin, specific to one of the new towers (#3, #4, or #5).~~
~~59454~~	~~January 17, 1964~~	~~Building Permit~~	~~Constructed a new concrete block chemical pump house with concrete roof.~~
~~59450~~	~~January 17, 1964~~	~~Building Permit~~	~~Constructed a steel-framed control room with stucco walls, cement plaster and composition shingles.~~
~~70897~~	~~July 26, 1964~~	~~Building Permit~~	~~Constructed an addition to Unit #5 as a superstructure and misc. fittings.~~
~~59215; 59217~~	~~August 12, 1970~~	~~Building Permit~~	~~Constructed one metal shed.~~
~~59219~~	~~August 12, 1970~~	~~Building Permit~~	~~Constructed all metal sheds as new auto parking.~~
~~27351~~	~~May 17, 1971~~	~~Building Permit~~	~~Constructed an electrical substation, control house.~~
~~74352~~	~~May 16, 1972~~	~~Building Permit~~	~~Constructed an addition to Unit #6 as a fuel tank to the steam plant.~~

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Permit No.	Date	Permit Type	Project Description
76951	May 17, 1972	Building Permit	Constructed a 120-foot diameter, 48-foot high fuel tank, adjacent to steam plant.
91134	December 6, 1973	Building Permit	Constructed a fuel storage shed and AC paving.
n/a	December 19, 1975	Building Permit	Installed seismic improvements on Cooling Tower #1.
22202	January 17, 1977	Building Permit	Constructed a new chemical storage building.
22204	May 17, 1977	Building Permit	Constructed Unit #8 as a utility building.
N/d	September 27, 1977	Building Permit	Constructed an addition to the power plant in expanding wet lab.
67723	April 16, 1980	Building Permit	Demolished a Cooling Tower #2
70060	May 16, 1980	Electrical Permit	Electrical inspections.
86682	June 16, 1981	Building Permit	Constructed a 10-foot high fence with concrete footings.
86682	September 27, 1982	Building Permit	Construction of a 10' fence with precast concrete at Flowers Street.
69130	April 16, 1983	Building Permit	Installation of new cooling tower
8385B003	July 29, 1985	Building Permit	Construction of steel-framed open parking shed
6974B006	February 10, 1987	HVAC or R Permit	Converted furnaces to natural gas.
3701B11	July 28, 1989	Building Permit	Constructed a concrete block and wood-framed addition as a generator.
47758011	August 18, 1989	Electrical Permit	Electrical inspections.
134980	October 27, 1992	Electrical Permit	Constructed an underground rigid conduit from boiler building.
M10035498	February 18, 1993	Mechanical Permit	Constructed 3 new compressors.
n/a	November 24, 1993	Building Permit	Constructed a 120 feet diameter, 48 feet high fuel/oil storage tank near steam plant.
M10041817	December 29, 1993	Mechanical Permit	Installed two 3 horsepower and 4 horsepower compressors.
E10051972	June 27, 1995	Electrical Permit	Installed 8 branch circuits.

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Permit No.	Date	Permit Type	Project Description
E10057544	April 8, 1996	Electrical Permit	Electrical alterations to the Plant.
P10057654	April 12, 1996	Plumbing/Gas Permit	Ground plumbing.
P10057796	April 22, 1996	Plumbing/Gas Permit	Alteration of waste line.
BB20000947	June 1, 2000	Building Permit	Constructed the foundation for an ammonia tank and shackle structure with 4-foot high containment walls.
BE20000916	January 7, 2001	Electrical Permit	Installed one circuit and completed 2 hours of electrical inspections.
BB20011252	January 9, 2002	Building Permit	Constructed a 9400-gal ammonia storage tank between Cooling Tower #3 and Unit #8A.
BB20020270	August 20, 2002	Building Permit	Constructed a 40-foot high aluminum flagpole on the corner of Air Way and Bekins Way.
BB20030204	August 3, 2003	Building Permit	Constructed of a steel canopy for two new fuel dispensers; removal of three existing fuel dispensers; fuel pipe relocation and existing tank modifications with removal of existing two underground tanks
BB20030719	October 18, 2003	Building Permit	Constructed a foundation for a fan in Unit #5's boiler as well as retrofit.
BB20050264	September 13, 2005	Building Permit	Constructed a foundation for electrical equipment in a control building that houses equipment for the Kellogg switching yard.
BE20050368	October 23, 2005	Electrical permit	Installed 10 branch circuits, 201-600 amp service district panel, 600-volt switchboard, one horsepower motor, and two 20 horsepower motors.
BB20050550	November 28, 2005	Building Permit	Constructed a concrete block electrical controls enclosure northwest of Kellogg yard made of a combination of structural steel, rebar, & concrete.

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Permit No.	Date	Permit Type	Project Description
BB20070259	September 4, 2007	Building Permit	Constructed two 100 square-foot offices on west side of superintendent's building that included one unisex ADA compatible restroom.
BE20070310	September 24, 2007	Electrical Permit	Constructed three branch circuits; ADA, unisex restroom, and two offices.
BB20080697	July 18, 2008	Building Permit	Demolished a 10,000 square-foot, steel-framed structure and 100 linear-feet, chain-link fence.
BB20080696	January 14, 2009	Demolition Permit	Demolition/Dispose of 45 linear-feet of 8 foot high, precast concrete walls with foundations, northwest of Superintendent's Office and Kellogg switchyard. The 10,000 square-foot, steel-framed structure at the Kellogg Switchyard was replaced, along with concrete foundation and electrical equipment.
20080698	January 14, 2009	Building Permit	Demolition and removal of 170 linear-feet of 10' high walls and foundation.
BE20100811	April 25, 2010	Electrical Permit	Constructed 3 branches and 1 motor
BB20100179	August 31, 2010	Demolition Permit	Demolition of steel canopies used for truck parking
BB20100178	August 31, 2010	Building Permit	Constructed a new parking lot in southwest corner.
BB20100177; BB20100180	August 31, 2010	Building Permit	Constructed 12' high perimeter wall with powered and manual gates; 8' high chain-link and wrought iron fence, new vehicle entrance with barrier gates on the south and southwest corner of the GWP near LA River.
BE20100266	October 20, 2010	Building Permit	Constructed 42 Branch circuits, one 201-AMP to 600AMP service, two district panels, 1-horsepower to 5-horsepower motor, and 1-switchboard.

HISTORIC RESOURCE INVENTORY AND EVALUATION GRAYSON POWER PLANT FOR CITY OF GLENDALE, CALIFORNIA

SITE ANALYSIS DESCRIPTION

Permit No.	Date	Permit Type	Project Description
BB1100817	January 12, 2011	Building Permit	Removal of partial concrete block wall and reinstall partial concrete block wall, located on garage & machine shop near Superintendent's office and meter shop.
BE20100687	March 22, 2011	Electrical Permit	Constructed an addition of six branch circuits and two motors on the roof.
BB1201470	January 18, 2012	Building Permit	Constructed a foundation (only) for a temporary modular trailer.
BP1208149	March 28, 2012	Plumbing/Gas Permit	Water and sewer improvements
BM1207519	July 12, 2012	Mechanical Permit	Installed two heating appliances and two air conditioning units.
BE 20030148	August 8, 2003	Electrical Permit	Modernized underground storage and tank system, new dispenser, and fuel island; 10 branch circuits, three motors up to 1-horsepower.

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5.0 ARCHITECTURAL DESCRIPTION

5.1 GRAYSON POWER PLANT SITE

The Plant site is situated on 11-acre parcel with its main entrance off Fairmont Avenue and represents numerous buildings and engineering structures (see Figure 2 and Figures 16-43) that include a boiler building, five cooling towers, nine boiler units, two switching yards, and miscellaneous buildings. The Plant represents approximately 17 building and structures with probably another five miscellaneous utilitarian buildings.

Since there have been significant changes on the site, each resource type in the Plant was reviewed per its original construction date and if it pre-dated 1970 as well as if each resource has architectural integrity or has been altered over time.

5.2 GRAYSON POWER PLANT, BOILER BUILDING

The Grayson Power Plant Boiler Building is a Streamline Moderne-style building, initially built in 1941, and expanded in 1947 and 1953. Facing southeast, the boiler building is set on a northwest-southeast axis and massing is predominantly rectangular divided into three levels and each elevation asymmetrical (Figures 16-26). Architecturally, the boiler building is 2-3-stories high and is framed with structural steel set on a poured concrete pier foundation (see Figure 16-17). The lower floor extends up a floor level on a poured concrete structure with a steel-framed superstructure set on top of the concrete walls; a second steel-framed structure is set on the northwest corner, which houses Unit 3. Streamline Moderne character-defining details are evident as linear lines in the cementitious paneling, illuminating stringcourses on the building's upper southeast corner addition, added during a 1953 expansion to building for Unit #3.

The building has a flat roof with metal coping at the top. The exterior of the building is clad with multiple building materials that include horizontal asbestos siding and horizontal metal sheathing that is bolted to the steel framing. The cementitious siding is visible on the interior of the building as well. A Streamline Moderne style-rolling directional crane, which services the boilers, turbines, and generators, is located on the northeast elevation (see Figure 17). Each of the five turbines is covered with a Streamline Moderne enclosure (see Figure 18-19). Copper box lettering in the same style is located on the corner and state: "CITY OF GLENDALE/PUBLIC SERVICE DEPARTMENT/STEAM ELECTRIC GENERATING PLANT" (see Figure 20-21). The northeast elevation of the building has a dock with boilers and equipment located on the northwest elevation (see Figure 22). The northwest elevation is where all the mechanical equipment and numerous boiler stacks for Boilers 1, 2, and 3. New equipment is evident for Boiler Unit #3 on the northwest corner.

Multiple openings punctuate the elevations of the boiler building on all elevations. The boiler building retains its original windows, which include structural glass blocks on the northeast

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elevation and metal-framed industrial awning windows on the southeast elevation (Figure 19 and 26).

Currently the building houses six boilers and is centrally located near the control room (Figures 27-33). The interior of the building is open with a catwalk or mezzanine floor of metal grating constructed on the west wall in operating the power equipment that include the boilers above and turbines, which attached to the concrete floor platforms. The corresponding boiler stacks and scrubbers are located on the exterior of building along the west wall. Much of the controls and other equipment installed prior to 1965 is also extant; although they have been mothballed, aka are no longer active.

5.3 GRAYSON POWER PLANT, BOILER UNITS

The Grayson Power Plant site has nine boiler units that range in construction dates and are located southwest of the main boiler building (Figures 31-33). The three-combined cycle repowering unit utilizes similar gas turbine engines as a 707 aircraft to drive two heat recovery generators. The unit's exhaust heat is reused to power the first two steam boilers constructed at the plant (Cook 1977; Ralph 1977).

Note: Tables five through eight below include discussion of the Plant's components/structures reference alteration dates and use the term "mothballed" to reference that a component/structure is existent but no longer in use. The "Architectural Integrity" column on the far right of the tables references the component/structure's physical identity that existed during the period of significance (1941-1970). If a component or structure remained unaltered from its period of construction and was constructed prior to 1970 (45 year or older) it is determined to contain "Architectural Integrity" for the purposes of this evaluation. This should not to be confused with the seven aspects of integrity per the NRHP and CRHR, which is discussed in the evaluation section of this report (Section 8.0).

Table 15 Construction and Alteration Dates of Boiler Units

Unit No.	Built Date[1]	Alteration Dates[2]	Architectural Integrity Yes/No?
Unit #1	1941	Intact; Mothballed	No
Unit #2	1947	Intact; Mothballed	No
Unit #3	1953	Modified 1983; 1989; 1994	No
Unit #4	1959	Modified 1983; 1989; 1994	No
Unit #5	1964	Modified 1983; 1989; 1994	No
Unit #6	1972	Demolished	N/A
Unit #7	1974	Demolished	N/A
Unit #8A, #8B, #8C	1977	Intact	N/A (less than 45 years old)

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Unit No.	Built Date[1]	Alteration Dates[2]	Architectural Integrity Yes/No?
Unit #9	2003	Intact	N/A (less than 45 year old)

1 Built Dates from the City of Glendale Department of Water & Power L.W. Grayson Steam Electric Generating Station.
2 Aerial analysis from 1952-2005 at the Nationwide Environmental Tile Research, LLC (NETR), www.historicaerials.com

As utilitarian structures, the exterior surfaces of the structures are constructed of metal with various metal pipes and venting systems throughout. Units 1 and 2 are located within the boiler building and have been mothballed, whereas Unit 3, 4, and 5 are located along the southwest elevation of the boiler building (City of Glendale 2014). These latter three units were commercially upgraded in 1983, 1989, and 1994. Oil tanks, adjacent and connected to the units have been removed or retired. Units 6 and 7 were demolished, and were not 45 years old or older, built between 1972-74. Units 8A, 8B, and 8C, were constructed in 1977, and are not 45 years old or older, and therefore not considered for the purposes of this evaluation. The last Unit added to the plant was Unit 9, built in 2003.

Of the nine units associated with cooling towers, 2 units are intact; however, have been mothballed therefore are not currently being used. Two units are not 45 years old or older whereas two other units have been demolished.

5.4 GRAYSON POWER PLANT, COOLING TOWERS

The Plant has five cooling towers located on the property, which were initially constructed between 1941 and 1964, and as part of a closed system with a cross-flow design.

Table 26 Construction and Alteration Dates of Cooling Towers

Cooling Tower No.	Built Date[1]	Alteration Dates[2]	Architectural Integrity Yes/No
Cooling Tower #1	1941	Altered 1972-1977	No
Cooling Tower #2	1947	Altered 1977-1980	No
Cooling Tower #3	1953	Burned in 2010	No
Cooling Tower #4	1959	2001; 2011	No
Cooling Tower #5	1964	Intact	No

1 Built Dates from the City of Glendale Department of Water & Power L.W. Grayson Steam Electric Generating Station.
2 Aerial analysis from 1952-2005 at the Nationwide Environmental Tile Research, LLC (NETR), www.historicaerials.com.

Each cooling tower is associated with one boiler, such as Cooling Tower 1 is associated with Boiler Units, 1A and 1B, and is set on a reinforced poured concrete water tank that are belowground. The towers' walls are between 2-3-feet thick and are poured concrete walls that enclose the tanks. Each cooling unit has a series of stacks that vary from 4 to 6 on top. Cooling

Towers 1 and 2 are designed with four stacks, which has splayed concrete sidewalls, while Cooling Tower 3 is constructed with six stacks, Cooling Tower 4 has eight stacks, and Cooling Tower 5 with five stacks (Figures 26-30). Additional features of the cooling towers include a louvered wall, which provides air circulation to cool the water from the boilers and wooden roof decks.

All of the cooling towers, with the exception of Cooling Tower 5, have been either rebuilt or significantly altered due to mechanical upgrades or natural disaster, such as fire. Cooling Tower 1 was altered between 1972-1977 with the construction of a maintenance shop east of the tower and the demolition of a set of 6 stacks (NETR Online 2015). Cooling Tower 2 was reduced from six stacks to four stacks sometime between 1977 and 1980 (NETR Online 2015). Both Cooling Tower 1 and 2 have been mothballed. Cooling Tower 3 caught fire and significantly burned in 2010 (City of Glendale 2010; Wells 2010). Cooling Tower 4 was also heavily repaired (City of Glendale 2011). Cooling Tower 5 is the only tower that appears to have not been altered. Of the five cooling towers located on the plant site, only one tower has architectural integrity, meaning it has not been altered or rebuilt in any way since its original construction over 45 years ago.

5.5 GRAYSON POWER PLANT, SWITCHING YARDS

There are two switching yards, or racks, east of the boiler building and are labeled as the Kellogg and the Glendale switching yards and adjacent to the Southern Pacific railroad line, as well as parallel with San Fernando Road.

Table 37 Construction and Alteration Dates of Switching Yards

Switching Yard No.	Built Date[1]	Alteration Dates[2]	Architectural Integrity Yes/No?
Glendale	1952	1964-1977; 2003	No
Kellogg	1972-77	2003	N/A (less than 45 years old)

1 Built Dates from the City of Glendale Department of Water & Power L.W. Grayson Steam Electric Generating Station.
2 Aerial analysis from 1952-2005 at the Nationwide Environmental Tile Research, LLC (NETR), www.historicaerials.com

The yards are used as part of the power grid in transferring power into lines; the yards are not 45 years old or older, and were constructed as well as upgraded between 1977 to the present, which included new equipment and expansions. One switching yard, Kellogg, is not 45 years old or older, whereas the Glendale switching yard has been altered and expanded over time.

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5.6 ADJACENT TO THE KELLOGG GAS INSULATED STATION IS NEW CONSTRUCTION LOCATED NORTH OF THE GLENDALE SWITCHING YARD. "MISCELLANEOUS BUILDINGS"

Five miscellaneous utilitarian buildings are located on the Plant site northwest of the boiler building (see Figure 4). These five buildings are typical gable or flat-roof buildings with roll-up doors and aluminum sliding glass windows. The parking sheds are flat-roof open structures where vehicles are housed. None of these buildings will be impacted by the proposed project (see Figure 2).

Table 48 Construction and Alteration Dates of Miscellaneous Buildings at Plant

Building	Built Date[1]	Alteration Dates[2]	Architectural Integrity Yes/No?
Shed building	c.1964	Intact	Yes
Warehouse	c.1964	Intact	Yes
Garage	c.1964	Intact	Yes
Parking sheds (2)	1977	Not Historic	N/A (less than 45 years old)

1 Built Dates from the City of Glendale Department of Water & Power L.W. Grayson Steam Electric Generating Station.
2 Aerial analysis from 1952-2005 at the Nationwide Environmental Tile Research, LLC (NETR), www.historicaerials.com

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PHOTOGRAPHS OF PROJECT SITE

Figure 16 Grayson Boiler Building: Northeast Elevation, View Looking Northwest

Figure 17 Grayson Boiler Building: Northeast Elevation, and Moving Crane on the Red Concrete Platform where Turbines are Located, View Looking Northwest

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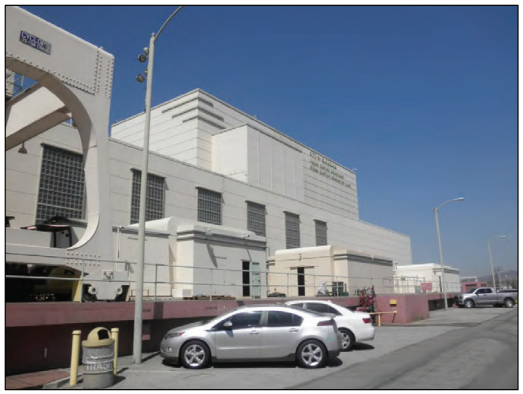

Figure 18 Grayson Boiler Building: Northeast Elevation, and its Two-Story Addition, View Looking Northwest

Figure 19 Grayson Boiler Building: Looking at Original Glass Block Windows and a Turbine at North End of Northeast Elevation, View Looking Northwest

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Figure 20 Grayson Boiler Building: on North End and Bronze Lettering on Asbestos Panels' States: CITY OF GLENDALE/PUBLIC SERVICE DEPARTMENT/STEAM ELECTRIC GENERATING PLANT, View Looking Northwest.

Figure 21 Grayson Boiler Building: Northwest Elevation, View Looking Southeast

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Figure 22 Grayson Boiler Building: Northwest Elevation, View Looking Southeast

Figure 23 Grayson Boiler Building: Northwest Elevation, View Looking Southwest

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Figure 24 Grayson Boiler Building: Northwest Elevation, and Additions on the Two-Story Component, View Looking Southwest

Figure 25 Grayson Boiler Building: Southwest Elevation Looking at Boiler Stacks for Boilers 1 and 2 Center Rear as well as Boiler 3 in far left (right), Boiler 3 (right). View Looking Southeast

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Figure 26 Grayson Boiler Building: Southeast Elevation, View Looking Northeast

Figure 27 Grayson Boiler Building: Interior Overview of Basement Floor Level, View Looking North

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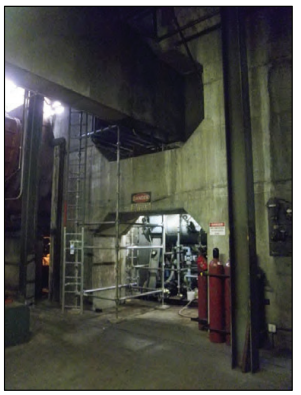

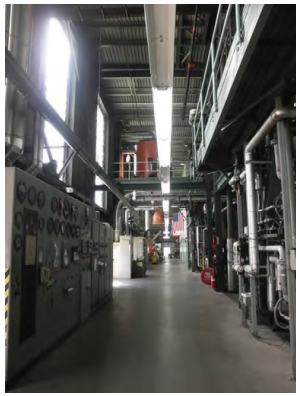

Figure 28 Grayson Boiler Building: Basement Level Depicting Concrete Structure Below Turbine and Generator 1, View Looking Northeast (left); Overview of Main Level, View Looking South (right)

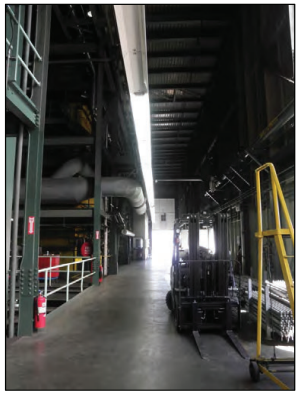

Figure 29 Grayson Boiler Building: Overview of First Floor, View Looking North (left); Control Room, View Looking Southwest (right)

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Figure 30 Grayson Boiler Building: Interior of Control Room, View Looking Northwest

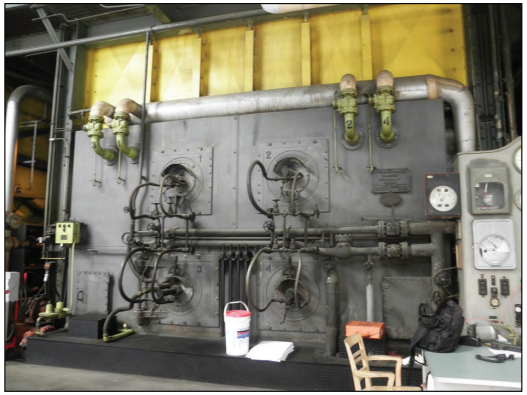

Figure 31 Grayson Boiler Building: Interior, View of Boiler 1B, Looking West

HISTORIC RESOURCE INVENTORY AND EVALUATION GRAYSON POWER PLANT FOR CITY OF GLENDALE, CALIFORNIA

ARCHITECTURAL DESCRIPTION

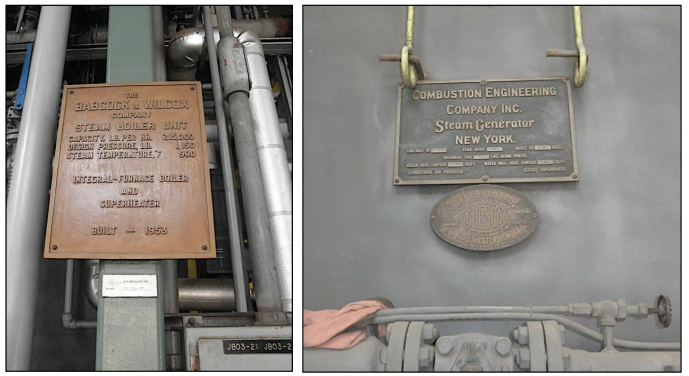

Figure 32 Grayson Boiler Building: Two Iron Mechanical Plaques. Iron Plaque for Steam Boiler Unit, Records Babcock Wilcox of New York in 1953 near Boiler 1A (left); Two Iron Plaques on Boiler 1A Record Steam Generator of New York from Combustion Engineering Company, Inc., built in 1940

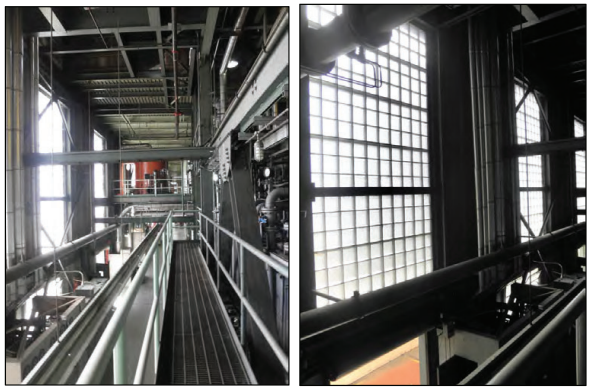

Figure 33 Grayson Boiler Building: Mezzanine, Looking Southeast (left); Structural Glass Block Windows on Northeast Elevation (right), Looking Southeast

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Figure 34 Unit 8A, Looking West

Figure 35 Units 8A & 8B, View Looking Northeast

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Figure 36 Units 8A, 8B, & 8C, View Looking Southeast

Figure 37 Cooling Tower No. 1 (Generator No. 9 in Background), View Looking East

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Figure 38 Cooling Tower No. 2 (Cooling Tower No. 1 in Background), View Looking Southeast

Figure 39 Cooling Tower No. 3 (Cooling Tower No. 5 in Background), View Looking Northwest

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Figure 40 Cooling Tower No. 4, View Looking Northeast

Figure 41 Cooling Tower No. 5, View Looking West

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Figure 42 Kellogg Switching Station, View Looking Northeast

Figure 43 Glendale Switching Station, View Looking Southeast

6.0 HISTORIC EVALUATION CRITERIA

6.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Under CEQA, public agencies must consider the effects of their actions on both "historical resources" and "unique archaeological resources." As stated in PRC Section 21084.1, a "project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." ~~PRC Section 21083.2 requires agencies to determine whether proposed projects would have effects on "unique archaeological resources."~~

"Historical resource" is a term with a defined statutory meaning (PRC Section 21084.1 and California Code of Regulations (CCR) Section 15064.5 [a]). The term embraces any resource listed in or determined to be eligible for listing in the **NRHP and the CRHR.** ~~California Register of Historical Resources (CRHR)~~. The CRHR includes resources listed in or formally determined eligible for listing in the NRHP, as well as some California State Landmarks and Points of Historical Interest.

Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts) or that have been identified in a local historical resources inventory may be eligible for listing in the CRHR and are presumed to be "historical resources" for purposes of CEQA (PRC Section 5024.1 and CCR, Title 14, Section 4850). Unless a resource listed in a survey has been demolished, lost substantial integrity, or a preponderance of evidence indicates that it is otherwise not eligible for listing, a lead agency should consider the resource to be potentially eligible for the CRHR.

In addition to assessing whether historical resources potentially impacted by a proposed project are listed or have been identified in a survey process (PRC 5024.1 [g]), lead agencies have a responsibility to evaluate them against the CRHR criteria prior to making a finding as to a proposed project's impacts to historical resources (PRC Section 21084.1 and CCR Section 15064.5 [a][3]). **CCR Section 15064.5 (a) describes a historical resource as any object, building, structure, site, area, place, or record.** ~~Following CCR Section 15064.5 (a) a historical resource is defined as any object, building, structure, site, area, place, record, or manuscript that:~~

~~Is historically or archeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political or cultural annals of California; and meets any of the following criteria:~~

- ~~Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;~~
- ~~Is associated with the lives of persons important in our past;~~

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- ~~Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or~~
- ~~Has yielded, or may be likely to yield, information important in prehistory or history.~~

~~For historic structures, CCR Section 15064.5 (b)(3) states that a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995) will mitigate impacts to a less-than-significant level. Potential eligibility also rests upon the integrity of the resource. Integrity is defined as the retention of the resource's physical identity that existed during its period of significance. Integrity is determined through considering the setting, design, workmanship, materials, location, feeling, and association of the resource.~~

~~As noted above, CEQA also requires lead agencies to consider whether projects will impact "unique archaeological resources." PRC Section 21083.2 (g) states that a "unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, a high probability exists that it meets any of the following criteria:~~

- ~~Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;~~
- ~~Has a special and particular quality such as being the oldest of its type or the best available example of its type; and/or~~
- ~~Is directly associated with a scientifically recognized important prehistoric or historic event or person.~~

~~Treatment options under PRC Section 21083.2 include activities that preserve such resources in place in an undisturbed state. Other acceptable methods of mitigation under PRC Section 21083.2 include excavation and curation or study in place without excavation and curation (if the study finds that the artifacts would not meet one or more of the criteria for defining a "unique archaeological resource").~~

~~Advice on procedures to identify cultural resources, evaluate their importance, and estimate potential effects is given in several agency publications such as the series produced by the Governor's Office of Planning and Research.~~

6.2 NATIONAL REGISTER OF HISTORIC PLACES AND CALIFORNIA REGISTER OF HISTORICAL RESOURCES

In order to be eligible for the NRHP or CRHR, a resource must be determined significant under at least one of the four criteria and retain integrity to its period of significance. The Criteria for the NRHP and Criterion for the CRHR are paraphrased below:

- **Criteria A/Criterion 1: Resources that are associated with events that have made a significant contribution to the broad patterns of our history;**
- **Criteria B/Criterion 2: Resources that are associated with the lives of significant persons in our past;**
- **Criteria C/Criterion 3: Resources that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;**
- **Criteria D/Criterion 4: Resources that have yielded or may be likely to yield, information important in history or prehistory.**

In addition to significance under one or more of the criteria listed above, a resource must possess integrity, defined by seven aspects as follows:

- **Location: the place where the historic property was constructed or the place where the historic event took place.**
- **Design: the composition of elements that constitute the form, plan, space, structure, and style of a property.**
- **Setting: the physical environment of a historic property that illustrates the character of the place.**
- **Materials: the physical elements combined in a particular pattern or configuration.**
- **Workmanship: the physical evidence of the crafts of a particular culture or people during any given period of history.**
- **Feeling: the quality that a historic property has in evoking the aesthetic or historic sense of a past period of time.**
- **Association: the direct link between a property and the event or person for which the property is significant.**

NRHP analysis is based upon all pertinent cultural resources guidance and best practices including that of 36 CFR Part 800 and technical bulletins including *National Register Bulletin 15:*

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How to Apply the National Register Criteria for Evaluation. **CEQA analysis based on CEQA Guidelines outlined in Section 5024.1 of the California Public Resource Code.[1]**

6.3 CITY OF GLENDALE REGISTER OF HISTORIC RESOURCES CRITERIA

The City of Glendale has the Glendale Register of Historic Resources for resources considered eligible. The Glendale Register of Historic Resources has criteria similar to the CRHR (City of Glendale 2012c; City of Glendale 2014). The Glendale Register criteria include the following:

> ~~**Criterion 1**~~ Is the proposed historic resource identified with important events in national, state, or city history, or exemplify significant contributions to the broad cultural, political, economic, social, or historic heritage of the nation, state, or city;
>
> ~~**Criterion 2 is**~~ **Is** the proposed historic resource associated with a person, persons, or groups who significantly contributed to the history of the nation, state, region, or city;
>
> ~~**Criterion 3**~~ Does the proposed historic resource embody the distinctive and exemplary characteristics of an architectural style, architectural type, period, or method of construction; or represent a notable work of a master designer, builder or architect whose genius influenced his or her profession; or possess high artistic values;
>
> ~~**Criterion 4**~~ Does the proposed historic resource yield, or have the potential to yield, information important to archaeological pre-history or history of the nation, state, region, or city; and/or
>
> ~~**Criterion 5**~~ Does the historic resource exemplify the early heritage of the city.

Integrity must also be determined for a property to be listed on the state register. The CRHR maintains a similar definition of integrity, while provided for a slightly lower threshold than the NRHP. The CRHR weighs integrity as much as significance when determining if a resource is eligible. The Glendale Register is silent on aspects of integrity. The assumption in this evaluation is that a resource, building, or structure would have some level of integrity to make it qualify for the local register (Jay Platt, personal communication, January 28, 2016).

[1] *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. National Park Service, 2002 Website accessed May 10, 2017: http://www.nps.gov/nr/publications/bulletins/nrb15/; California Public Resource Code, "Article 2, Historic Resources," http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum =5024.1. Accessed May 15, 2017.

7.0 ELIGIBILITY EVALUATION

Glendale's Grayson Power Plant served as a local power source since construction. While the power plant has maintained this role, it has not directly contributed to the early growth of the City, further it only supplemented electricity supplied by other utilities and by the 1937 constructed Hoover Dam. The power plant did supply the region with localized power, however, it is just a continuation of existing power supplies. By the time the power plant came online, in 1941, the City had been electrified for 32 years. Supply was high, the City, understandably preferred control of their own power supply. California, like much of the west had begun interconnection a series of previously independent transmission systems into an interconnected grid. When originally conceived, the plant would provide a localized source of power, however by the 1940s the state had already begun interconnection. Further, fuel-fired steam plants were well established across California by 1941, that utilized proven technologies. The Grayson Power Plant property as first constructed in 1941 represented the designs of the 1920s, this was soon realized as the plant underwent numerous upgrades and additions through the 1940s, 1950s, 1960s, 1970s, and 1980s to keep pace with the larger, semi-outdoor boiler types that proliferated across California in the 1950s and 1960s. Therefore, Grayson Power Plant is ineligible, under NRHP Criteria A, CRHR Criterion 1 and GRHR as it is not associated with important events in national, state, or city history, or exemplifies significant contributions to the broad cultural, political, economic, social, or historic heritage of the nation, state, or city. Rather, the plant is a continuation of electrical generation themes in a city that had been using electricity for 32 years.

There is no evidence that Grayson Power Plant has any important association with any person or persons who made significant contributions to history at the local, state, or national level. It was designed to supplement and create a localized power source that involved several key institutions and individuals. Research did not reveal any notable figures specifically associated with the alignment or its related infrastructure, and research did not indicate the potential for significant associations in this regard. While the power plant is currently named Grayson Power Plant for L.W Grayson, a longtime Glendale employee. The name change, occurred in 1972, was in recognition of Grayson 19 years of service to the City. Grayson was important in management of the City but had no association with development, construction, or early operation of the plant. The power plant is recommended not eligible under NRHP Criteria B, CRHR Criterion 2 or for the Glendale Register of Historic Resources.

The subject property is not eligible for NRHP Criteria C, CRHR Criterion 3 nor the Glendale Register of Historic Resources. Grayson Power Plant when originally constructed as a small, two-unit boiler house with Streamline Moderne styling. Since originally constructed, the power plant main boiler building has undergone numerous additions and alterations. These additions, mimic Elliott's design but with each addition are farther removed from the original.

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Daniel Anthony Elliott, is arguably a master architect with noteworthy designs focusing on water related infrastructure including the Colorado River Aqueduct Pumping Plants and F.E. Weymouth Memorial Water Softening and Filtration Plant completed in 1939 and later the Burbank Water & Power administrative building in 1949. The F.E. Weymouth Memorial Water Softening and Filtration Plant is the earliest extant example of Elliott's work, further it is the best example of monumental water and power architecture. Built in a Spanish Revival design, this building exemplifies the style, prominent of the time and best showcases Elliott's ability to make infrastructure into beautiful architecture. They original design of the Grayson Power Plant followed these design tenants. Elliott used prominent architectural styles on infrastructure. Elliott's design followed established power plant and substation design principles emblematic of the 1910s and 1920s. Power company architects designed substations and powerhouses in prominent public-building architectural styles like Beaux-Arts and Classical Revival. Urban power houses and substations housed the electrical equipment within buildings in order to accommodate the congested urban surroundings and to buffer the public from the sounds and activities associated with operation. The power plants and substations were constructed to meet both aesthetic and functional mandates (Frickstad 1916). Elliott's design of the Streamline Moderne power plant is a 1940s continuation of these design principles. Further, the 1941 building designed by Elliott has been manipulated and changed beyond his original vision through multiple building modifications. Further, the F.E. Weymouth Memorial Water Softening and Filtration Plant is far more intact example of his early designs.

An article noted its design as earthquake resistant meaning its generators were located outside on a concrete foundation that was resistant to earthquakes with metal coverings to protect it from weather. R.R. Martell, noted earthquake engineer consulted on the project stating the generator could be constructed outside the main boiler building. Through time the power plant has withstood earthquakes, as have other power plants with varied designs. This design is important in the greater advancement of power plant designs. Unfortunately, multiple additions and modifications have degraded its integrity and it can no longer convey this significance under NRHP Criteria C or CRHR Criterion 3. As noted before, the Glendale Register of Historic Resources does not assess integrity. The evolution of earthquake resistant power plant is important to the context of power plant design in California, however it's within the context of Glendale is lessened.

The property does not appear likely to yield significant informational associations under NRHP Criteria D, CRHR Criterion 4 or the Glendale Register of Historic Resources as the plant does not yield information important to archaeological pre-history or history of the nation, state, region, or city. In contrast, the extant archival record regarding the site presents a wealth of specific and informative material, including maps, photographs, aerials, and building permits that provides significant material for interpretation. Thus, the extant physical structures of the site do not convey significant informational material that would inform the rather robust archival record regarding the Grayson Power Plant.

The Grayson Power Plant was constructed approximately 60 years after the early development of the City of Glendale and 35 years after the City incorporated electricity in 1906. Due to this passage of time it is not associated with the early heritage of the City and not eligible for listing on the Glendale Register of Historic Resources.

While the Glendale Register of Historic Resources does not account for integrity, the NRHP and CRHR does. Due to numerous building additions and continued evolution of the property there has been a loss of integrity of design, materials, workmanship, and feeling. The property retains integrity of location, setting, and association. The power plant has not moved, the overall setting has remained industrial, and it maintains its association as a power plant. However, numerous alterations have removed its integrity of design to the original plant conceived by Elliott, materials as the building materials, while similar are different in type and massing from the original section. The plant has lost its association of workmanship as the additions have fundamentally altered the physical characteristics of the building as original constructed in 1941 and finally the plant has lost its original feeling. Aside from the numerous building additions continued addition of non-attached boiler units with modern cooling towers and ancillary buildings have removed the original feeling of the property. Therefore, the building has lost integrity coupled with lack of significance the building is not eligible for the NRHP or CRHR under any criterion.

~~While the Grayson Power Plant does possess potential significance under CRHR Criterion 1/Glendale Register of Historic Resources Criterion 1, CRHR Criterion 2/Glendale Register of Historic Resources Criterion 2, CRHR Criterion 3/Glendale Register of Historic Resources Criterion 3, and CRHR Criterion 4/Glendale Register of Historic Resources Criterion 4, a lack of integrity under all aspects of integrity recognized by the CRHR and applied to the City of Glendale Register of Historic Resources undermines the property's ability to convey significance and precludes it from listing on both the State and local registers. As developed in the historic context, the site was associated with significant advances in electrical generation and power in Los Angeles and the City of Glendale and was an early example of a modern power plant in Los Angeles County (Criterion1). The Grayson Power Plant also appears to be eligible under CRHR Criterion 2, because of its association with L.W. Grayson who managed the plant during the City of Glendale's population boom from 1951-1970 (Criterion 2). In addition, as designed the Plant was reflective of a cohesive operational and industrial design structure, with industrial operations characterizing the site (Criterion 3). In this regard, the historical attributes of the site have the potential to present important information regarding electrical generation and operations of the period (Criterion 4).~~

~~Despite this potential significance, a comprehensive lack of integrity precludes listing in the CRHR or Glendale Register of Historic Resources under any of the criteria. As documented in detail in the historic context, site analysis description and architectural description, the Grayson Power Plant site was systematically altered, dismantled, and demolished over time, with alteration, demolition, and abandonment of most major structures besides Cooling Tower #5 and several ancillary associated structures like a garage, warehouse, and parking sheds. While~~

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~~remnant features of the original 1940s construction of the Plant remain, as a whole the site does not present a discernible entity that can convey significance. The remaining features do not present integrity of materials, workmanship, design, setting, feeling, or association and cannot illustrate any coherent significant facets of the original power plant, as described in detail below.~~

~~The Grayson Power Plant's role (purpose) as a municipal power generator for the City of Glendale has remained consistent over the years since its original construction. In that aspect, the continuity of use of the Plant for electricity influenced the history and growth of the City; however, under CRHR Criterion 1 (Glendale Register of Historic Resources Criterion 1), the remnant features of the Plant cannot convey distinctive themes relating to electrical transmission or development of the State, County, or City, or material or social conditions of the period. With the alterations, upgrades, demolition, and mothballing of features that reached the end of their useful lives and/or replaced by more efficient technologies for energy generation, the existing Plant structures cannot convey association to the early- to mid- twentieth century development or operation period during the period of significance (1941-1970). While the boiler building, boiler units, cooling towers, switching yard, and miscellaneous ancillary buildings remain on the site, their alterations and changes over the years have resulted in a loss of the original architectural design and character necessary to convey significance under this Criterion. Further, the development of modern infrastructure and modifications around the original structures severs it from any significant associations.~~

~~A lack of integrity under CRHR Criterion 2 (Glendale Register of Historic Resources Criterion 2) precludes the Grayson Power Plant from consideration in this regard. Although the Plant is associated with L.W. Grayson who managed it during the City's population, growth, and expansion boom from 1951-1970, a lack of material integrity of the buildings and structures at the Plant precludes discernable associations to L.W. Grayson.~~

~~The subject property cannot convey significant associations under CRHR Criterion 3 (Glendale Register of Historic Resources 3), as the material integrity of the property has been comprised by alteration, demolition, and new development. As discussed in detail in the historic context, site analysis description, and architectural description, the Grayson Power Plant was a cohesively designed site that included a number of integrated operational features (boiler building, boiler units, cooling towers, switching yards, etc.). As such, the historic design of the plant has the potential to convey significant engineering and engineering design elements associated with architect, Daniel Elliott. Elliott is well known for designing the Burbank Water & Power Company Building in 1949, whereas the Grayson Power Plant is a more functional, utilitarian site and is not a good example of Elliott's work (LA Conservancy 2015). The alteration and removal of many of the original site features undermines any ability to convey significance in this regard. As such, only a few remaining ancillary and supporting structures (Cooling Tower #5, garage, warehouse, and parking sheds) have the ability to convey significance under this Criterion. In addition, the Grayson Power Plant's materials and workmanship are common, mid-century building materials and therefore not unique.~~

~~The property does not appear likely to yield significant informational associations under CRHR Criterion 4 (Glendale Register of Historic Resources 4). The alteration and removal of many structures and buildings precludes informational insight into the construction or operational techniques of the plant. Additionally, ongoing site development has continuously disturbed the site. As such, neither the buildings and structures, nor the site represent an intact feature that has the potential to yield coherent historical information. In contrast, the extant archival record regarding the site presents a wealth of specific and informative material, including maps, photographs, aerials, and building permits that provides significant material for interpretation. Thus, the extant physical structures of the site do not convey significant informational material that would inform the rather robust archival record regarding the Grayson Power Plant.~~

~~The Grayson Power Plant was constructed approximately 60 years after the early development of the City of Glendale and 35 years after the City incorporated electricity in 1906, therefore, it is not associated with the early heritage of the City and not eligible for listing on the Glendale Register of Historic Resources Criterion 5.~~

Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

8.0 SUMMARY OF FINDINGS

The City of Glendale Department of Water and Power plans to demolish the 1941 Grayson Power Plant Boiler Building with subsequent structures that include five cooling towers and units, as well as a generator between Cooling Tower 1 and 2, designated as Unit 8A, 8B, and 8C as part of a repowering project; Unit 9, built in 2003, will be the only resource on the site that will be retained.

The Grayson Power Plant was evaluated per NRHP under Criteria A, B, C, and D, the CRHR under Criterion 1, 2, 3, 4, and Glendale Register of Historic Resources and found not eligible for listing on any of the registers. For the purposes of Section 106 of the NHPA, CEQA and the Glendale Register of Historic Resources, the site is not eligible; therefore, no mitigation is required prior to or during project implementation. For a more in-depth discussion please see the DPR-523 in Appendix A of this report.

~~The Grayson Power Plant was evaluated per the CRHR and Glendale Register of Historic Resources and found not eligible for listing on the State or local registers under Criterions 1, 2, 3, 4, and Criterion 5 (Glendale Register of Historic Resources). For the purposes of CEQA and the Glendale Register of Historic Resources, the site is not eligible; therefore, no mitigation is required prior to or during project implementation.~~

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HISTORIC RESOURCE INVENTORY AND EVALUATION GRAYSON POWER PLANT FOR CITY OF GLENDALE, CALIFORNIA

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APPENDICES

Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

Appendix A UPDATED CALIFORNIA DEPARTMENT OF PARKS AND RECREATION DPR (523) SITE RECORD FORM

Stantec

Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z
Other Listings
Review Code _____ Reviewer _____ Date

Page 1 of 25 ***Resource Name or #:** (Assigned by recorder) Grayson Power Plant
P1. Other Identifier:

***P2. Location:** ☐ **Not for Publication** ☒ **Unrestricted** ***a. County** Los Angeles
and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)
b. USGS 7.5' Quad Burbank, CA
Date 2015 **T** 1N; **R** 13W **Sec** 7 S.B. **B.M.**
c. Address 800 Air Way City Glendale Zip 91201
d. UTM: (Give more than one for large and/or linear resources) Zone, 10S 382154 mE/ 3780132 mN
e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, decimal degrees, etc., as appropriate)
From downtown Glendale, travel 2.3 miles west on Elk Avenue to San Fernando Road, proceed northwest of 2.8 miles on San Fernando Road to Flower Street. Travel southwest on Flower Street to Air Way, the power plant is located on Air Way at the convergence of the Los Angeles River and Fairmont Avenue. APN: 5593-003-906.

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

Glendale Water and Power's Grayson Power Plant is a steam electric power plant located in Glendale, CA. The approximately 11-acre property is bounded by Union Pacific Railroad tracks and San Fernando Road to the northeast, Fairmont Avenue to the southwest, south, and southeast. The property contains numerous elements of power generating infrastructure including a boiler building with nine boilers, generators, five cooling towers, two switch yards, and multiple auxiliary buildings amounting to approximately 17 permanent buildings and structures (**Photograph 1**) (see Continuation Sheet).

***P3b.Resource Attributes:** (List attributes and codes) HP8 – Industrial Building, HP11 – Engineering Feature

***P4. Resources Present:** ☒ Building ☒ Structure ☐ Object ☐ Site ☐ District ☐ Element of District ☐ Other (Isolates, etc.)

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)

P5b. Description of Photo: (view, date, accession #)
Photograph 1: Grayson Power Plant, camera facing southwest, August 17, 2015.

***P6. Date Constructed/Age and Source:**
☒ Historic ☐ Prehistoric ☐ Both
1941, Glendale Water and Power

***P7. Owner and Address:**
City of Glendale, Glendale Water and Power
800 Air Way
Glendale, CA 91201

***P8. Recorded by:** (Name, affiliation, and address)
Meagan Kersten and John Terry
Stantec, Inc.
555 Capitol Avenue, Suite 650
Sacramento, CA 95814

***P9. Date Recorded:** August 17, 2015

***P10. Survey Type:** (Describe) Intensive

***P11. Report Citation**: (Cite survey report and other sources, or enter "none.")
Historic Resource Inventory and Evaluation Report, Grayson Power Plant, Glendale, CA, Stantec, 2015 (Revised 2017)

***Attachments:** ☐NONE ☐Location Map ☒Continuation Sheet ☒Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record ☐Artifact Record ☐Photograph Record ☐ Other (List):

DPR 523A (9/2013) ***Required information**

Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

State of California - The Resources Agency Primary #
DEPARTMENT OF PARKS AND RECREATION HRI#
BUILDING, STRUCTURE, AND OBJECT RECORD

***Resource Name or #** (Assigned by recorder) Grayson Power Plant ***NRHP Status Code** 6Z
Page 2 **of** 25

B1. Historic Name: Glendale Public Service Department, Steam Electric Generating Plant
B2. Common Name: Grayson Power Plant
B3. Original Use: Power Plant B4. Present Use: Power Plant
***B5. Architectural Style:** Streamline Moderne
***B6. Construction History:** (Construction date, alterations, and date of alterations) Grayson Power Plant was constructed in 1941 with additions added to the main boiler building in 1952, 1963, 1972, and 1977. The site has continuously evolved as technology changed and more units were brought online (see detailed history below)

***B7. Moved?** ☒No ☐Yes ☐Unknown **Date:** _____ **Original Location:** _____
***B8. Related Features:** none
B9a. Architect: Daniel A. Elliott b. Builder: Glendale Public Service Department
***B10. Significance: Theme** n/a **Area** n/a
Period of Significance n/a **Property Type** n/a **Applicable Criteria** n/a (Discuss importance in terms of historical or architectural

This intensive level survey and evaluation finds that Grayson Power Plant, while significant, lacks integrity to convey this significance for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR) or Glendale Register of Historic Resources (GRHR). The property has been evaluated in accordance with Section 15064.5(a)(2)-(3) of the California Environmental Quality Act Guidelines (CEQA), using the criteria outlined in Section 5024.1 of the California Public Resources Code and does not appear to be a historical resource for the purpose of CEQA (see continuation sheet).

B11. Additional Resource Attributes: (List attributes and codes) _____

***B12. References:** See footnotes

B13. Remarks:

***B14. Evaluator:** Corri Jimenez and Garret Root, Stantec Inc.

***Date of Evaluation:** December 2015 and December 2017

This space reserved for official comments.

DPR 523B (9/2013) *Required information

State of California - The Resources Agency Primary#
DEPARTMENT OF PARKS AND RECREATION HRI #
Trinomial

CONTINUATION SHEET
Property Name: Grayson Power Plant
Page 3 of 25

P3a. Description (Continued):

Grayson Power Plant's boiler building faces southeast, on a northwest-southeast axis and massing is predominantly rectangular divided into three levels and each elevation asymmetrical (**Photograph 2** and **3**). Architecturally, the boiler building is 2-3-stories high and is framed with structural steel set on a poured concrete pier foundation (**Photograph 4**). The lower floor extends up a floor level on a poured concrete structure with a steel-framed superstructure set on top of the concrete walls; a second steel-framed structure is set on the northwest corner, which houses Unit 3. Streamline Moderne character-defining details are evident as linear lines in the cementitious paneling, illuminating stringcourses on the building's upper southeast corner addition, added during a 1953 expansion to building for Unit #3.

The building has a flat roof with metal coping at the top. The exterior of the building is clad with multiple building materials that include horizontal asbestos siding and horizontal metal sheathing that are bolted to the steel framing. The cementitious siding are visible on the interior of the building as well. A Streamline Moderne style-rolling directional crane, which services the boilers, turbines, and generators, is located on the northeast elevation. Each of the five turbines is covered with a Streamline Moderne enclosure (**Photograph 5**). Copper box lettering in the same style are located on the corner and state: "CITY OF GLENDALE/PUBLIC SERVICE DEPARTMENT/STEAM ELECTRIC GENERATING PLANT" (see Figure 20-21). The northeast elevation of the building has a dock with boilers and equipment located on the northwest elevation (**Photograph 6**). The northwest elevation is where all the mechanical equipment and numerous boiler stacks for Boilers 1, 2, and 3. New equipment is evident for Boiler Unit #3 on the northwest corner.

Multiple openings punctuate the elevations of the boiler building on all elevations. The boiler building retains its original windows, which include structural glass blocks on the northeast elevation and metal-framed industrial awning windows on the southeast elevation (**Photograph 7**). Currently the building houses six boilers and is centrally located near the control room. The interior of the building is open with a catwalk or mezzanine floor of metal grating constructed on the west wall in operating the power equipment that include the boilers above and turbines, which attached to the concrete floor platforms. The corresponding boiler stacks and scrubbers are located on the exterior of building along the west wall (**Photograph 8**).

The Grayson Power Plant had eleven boiler units with seven intact. Units 1 and 2 are located within the boiler building and have been mothballed. Units 3, 4, and 5 are located along the southwest elevation of the boiler building. Units 6 and 7, built between 1972-1974, have since been demolished. Units 8A, 8B, and 8C, were constructed in 1977 and Unit 9, built in 2003. Units 1 through 4 are housed in the main boiler building with additions. Structures 8A, 8B, 8C, and 9 are located within utilitarian metal structures (**Photograph 9** and **10**).

Located west of Grayson Power Plant's boiler units are five cooling towers. Each cooling tower correlates to one boiler. The cooling towers consists of a sub grade water tank is enclosed by two-to-three-foot-thick concrete walls. Each cooling unit has a series of vent stacks. Cooling Towers 1 and 2 are designed with four stacks, which has splayed concrete sidewalls, while Cooling Tower 3 is constructed with six stacks, Cooling Tower 4 has eight stacks, and Cooling Tower 5 with five stacks (**Photograph 12, 13,** and **14**). Additional features of the cooling towers include a louvered wall, which provides air circulation to cool the water from the boilers and wooden roof decks. There are two switching yards, east of the boiler building and are labeled as Kellogg and the Glendale switching yards. The yards are not historic and are not part of this inventory. Five miscellaneous utilitarian buildings are located on the property northwest of the boiler building. These buildings were not inventoried or evaluated as part of this study.

DPR 523J (9/2013) *Required information

Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

State of California - The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
Primary#
HRI #
Trinomial

CONTINUATION SHEET

Property Name: Grayson Power Plant
Page 4 of 25

B10. Significance (Continued):

Historic Context

The Glendale Public Service Department steam electric generation plant, renamed Grayson Power Plant in 1972, was constructed in Glendale in 1941, Since construction the power plant has undergone numerous alterations and expansions. The Streamline Moderne boiler building has more than tripled in size since originally conceived by architect Daniel A. Elliott. Fuel fired steam electric units have been common power generators in California since the 1920s. The design and power output changed dramatically by the end of World War II as municipalities and utilities moved towards semi-outdoor fuel fired steam plant. This reduction in building material cost drove exponential growth in the post-war years, becoming common fixtures across California. The Grayson Power Plant represents a transition in fuel fired power plant design that is more associative with the early 1920s designs rather than the more prominent post-war designs.

Electricity in California

California's growth in the first half of the twentieth century was due in part to the development of ambitious hydroelectric systems. Long-distance transmission lines linked the power generating mountainous regions with valley farms, coastal centers, and distant cities, allowing a pace and scale of development that was previously unimaginable. By the 1920s, this intricate system of hydroelectric facilities, coupled with a growing number of fuel-fired steam plants, fed into long distance transmission lines and a series of substations that transferred and distributed power to locations throughout the state for widespread public use (Root and Herbert 2013: 1; Department of Energy 2015). Within this burgeoning energy context, the long-distance transmission lines were of vital importance, serving as the nexus between the state's abundant hydro supplies and the distant urban and agricultural markets. The technological advancement and development of transmission technology enabled greater and greater supplies of readily available energy, occurring with striking rapidity during the period (Root and Herbert 2013: 1-2).

In the late nineteenth century and into the twentieth, electrical transmission covered small distances, typically limited to tens of miles. During this period, the technological debate raged between two key concepts: Direct Current (DC), championed by General Electric and Thomas Edison, and Alternating Current (AC), championed by Westinghouse and electrical engineer Nikola Tesla (Department of Energy 2015; Williams 1997: 90). The critical limitation to DC was its inability to be transmitted over great distances, as the current could not be converted to higher and lower voltages and rapidly lost energy along any distances. In contrast, Tesla's AC stepped up voltage for transmission and stepped down voltages for local distribution, creating a system that avoided the energy seepage of DC. Ultimately, Tesla's vision of AC prevailed and soon transmission lines could carry more power over greater distances, a development that undergirded much of the state and nation's early twentieth century growth. Rapid innovation during the first decades of the twentieth century allowed for increasingly higher voltages, with heavier insulators, multi-phase lines, and other mechanical methods adapted to carry greater supplies more efficiently, following the adoption of AC. By the early-1910s, California's hydroelectric industry was carrying hundreds of kV of electrical power over hundreds of miles (**Figure 1**) (Root and Herbert 2013: 1-3; Hayes 2014: 237-270).

In the 1880s, hydroelectric plants provided small-scale electrical development to only isolated companies, such as Standard Consolidated Mining Company in Bodie, CA and other localized concerns (Hubbard 2006).

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However, by the early 1890s AC technological advancement allowed for a more effective means of transmitting electricity over ever-increasing distances. At the outset of this development, the San Antonio Light and Power Company constructed a 13 mile, 5,000-volt, transmission line in 1892, with PG&E constructing the Folsom Hydroelectric Plant's 22 mile, 11,000-volt transmission line in 1895 (Coleman 1952: 138-140). These distances soon gave way to ever larger transmission capability, with Pacific Light and Power Company's Big Creek Hydroelectric Project running at 150 kV by 1913. Several small companies began constructing independent and local power plants a transmission systems (JRP 2004).

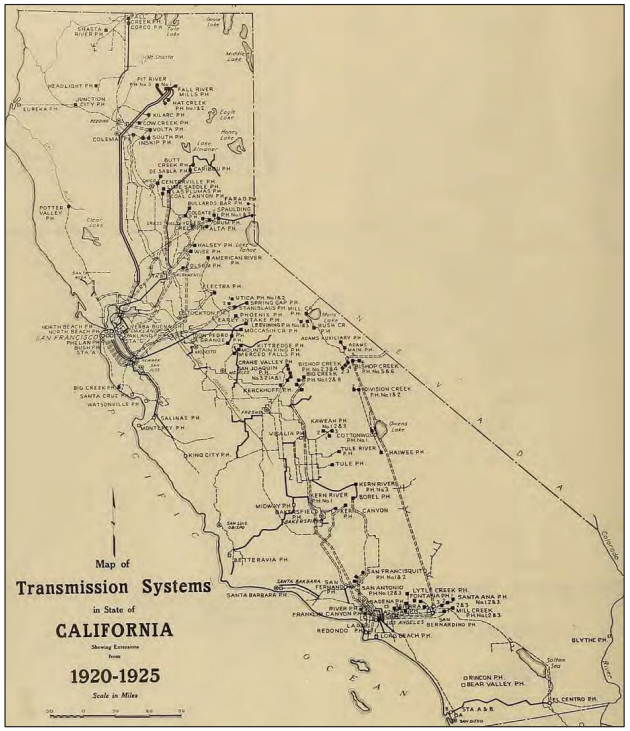

Figure 1. A 1925 map depicting the growth of the transmission system (Vincent 1925).

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Rise of Fuel-Fired Steam Electric

British designer Sir Charles Parsons built the first steam turbine-generator in 1884. At the beginning of the twentieth century, engineers designed steam turbines to replace the aging steam engine power plants. Aegidius Elling of Norway is credited in 1903-1904 as being the first to apply the method of injecting steam into the combustion chambers of a gas turbine engine (Termuehlen 2001: 11, 21-28; Beck and Wilson 1996: 30). The greater Los Angeles region had multiple examples of early fuel fired steam plants including the Banning Street Electrical Plant in Los Angles completed in 1883, Los Angeles Steam Plant No. 1 constructed in 1896, Pacific Light and Power Company's steam plant in Redondo Beach was completed in 1902 and the Glenram Power Plant constructed in Pasadena in 1906 (Water and Power Associates 2017; City of Pasadena 2015). Within a relatively short time, the technology and capacity of these engines to supply power and electricity grew exponentially. These advances brought electricity to a wide range of industrial and domestic applications; however, the materials needed to withstand the high temperatures of modern turbines were not yet available. Improvements in steam turbines advanced throughout the 1920s and 1930s, leading to a generation of more efficient turbine power plants in the 1950s. During this time, utilities closed or replaced many of the older steam-electric plant generators and constructed more modern units (Myers 1984: 8).

Steam power generation was part of California's power production throughout the twentieth century, though it declined considerably in the period leading up to World War II as large hydroelectric generating plants came online throughout the state. As early as 1920, hydroelectric power accounted for 69% of all electrical power generated. In 1930, that figure had risen to 76%, and by 1940 hydroelectric sources provided 89% of California's electricity. After World War II this trend reversed and construction of steam-powered electric generating units grew, accounting for most of the new construction. By 1950, hydroelectricity accounted for only 59% of the total power generated, falling to 27% in 1960. Some new hydroelectric plants were built during the 1960s, chiefly associated with federal and state water projects, but by 1970, hydroelectric plants accounted for only 31% of all electricity generated in California. A combination of drought, discovery and tapping of natural gas, and lack of new hydroelectric sites led to its decline (Williams 1997: 374).

A persistent drought in California caused the major utilities to question the reliability of systems dependent on abundant water flows, like hydroelectricity. This drought began in 1924 and continued, on and off, for a decade. Concurrently, in the 1920s new natural gas discoveries were made and provided both Northern and Southern California with ample fuel for steam electric power generation. The confluence of these various factors – drought, new steam generator technologies, and new supplies of natural gas – prompted California utilities to begin constructing large steam plants. Steam plants built across the state shared design characteristics including locations close to load centers to reduce transmission costs, easy and efficient access to fuel supplies, near a water supply, on inexpensive land, and on geological formations that could provide a good foundation (Steele 1950: 17-21). By 1920, the cities of Burbank, Pasadena, Los Angeles, and Glendale restructured their original charters to allow municipality owned power generation facilities and distribution lines (Williams 1997:261; Water and Power Associates 2015; Electrical West 1929). In 1928, LA Gas and Electric Corporation constructed the Seal Bach Power Plant and PG&E constructed Station C in Oakland. In 1929, Great Western Power Company built a large steam plant on San Francisco Bay, near the Hunters Point shipyard, fitted with two 55 MW generators. In 1930, fuel-fired steam power plant accounted for more than

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half of all new plants under construction in California. The fuel-fired steam generation capacity jumped from 1924 at 407,000 kW to over 1 million kW a mere six years later. (Williams 1997: 279-280; City of Pasadena 2015; Burbank Water & Power 2015; Water and Power Associates 2017; Spencer 1961). These factors prompted many municipalities, like Glendale to construct power plants of their own.

Early Glendale History

By the turn of the twentieth century, Glendale had already experienced rapid growth resulting, in part, from the promotional efforts of Edgar D. Goode and Dr. D. W. Hunt and their Glendale Improvement Society in 1902 (City of Glendale 2012a). The growth continued with the opening of the Pacific Electric Railroad in 1904, connecting Glendale to Los Angeles (City of Glendale 2012a). Glendale incorporated in 1906 and by 1910 had a population of 2,742 residents (Glendale News-Press 1953c; Los Angeles Almanac 2015). Power generation in the City of Glendale began in earnest early when the citizens voted in favor of a $60,000 bond to create the Glendale Public Service Division that purchased the Glendale Light & Power Company generating facility in 1909. By 1910, the system was already strained as power output was a mere 107,000 kilowatts. To supplement, the city purchased additional electricity from Pacific Power & Light, now part of the Southern California Edison Company (Glendale Public Service Commission 1951).

By 1920, Glendale began annexing neighboring communities boasting the city's population to over 13,000 residents (City of Glendale 2012b; Los Angeles Almanac 2015). From 1930 to 1952, Glendale added Whiting Woods and Verdugo Mountains to their city limits a total of 23.6 square miles; two major annexations included New York Avenue (in the La Crescenta area) and Upper Chevy Chase Canyon, and several smaller annexations, which enlarged the city to 29.2 square miles by 1952. By 1950 the population was over 95,700 residents and was considered at the time to be "the fastest growing city in America" (City of Glendale 2012b; Los Angeles Almanac 2015). However, by the late 1930s the Glendale Public Service Commission, Electric Division could not keep pace with the population increases (Glendale Public Service Commission 1951). Prior to 1937, Glendale purchased their power from Southern California Edison Company. This supply was supplemented with completion Hoover Dam however, continued growth indicated another plant would be necessary to supplement demand [Glendale News-Press 1953a; Glendale Public Services Department 1974).

Glendale Steam Electric Generating Plant

Building off the success of the 1920s and early-1930s and seeing the impending probability of an outbreak of hostilities, utilities and municipalities began constructing a series of fuel-fired steam plants across California. Northern California PG&E began construction of three, fuel-fired steam -plants located adjacent to oil refineries, in 1939. Southern California municipalities, in Burbank, Glendale (study property), and San Diego each completed power plants, in 1941 (Williams 1997: 279-280). The City of Glendale began planning for construction of a new power plant in 1937. However, the city's plans were met with immediate opposition by Los Angeles Bureau of Power and Light and the Southern California Edison Company, both which supplied the city with electricity and claimed had surplus electricity which could be sold to the city (Los Angeles Times 1938). Despite these assertions, the city, led by industrial entities pushed forward with their plan for construction of a $1.8 million-dollar plant. The City secured the services of Architect Daniel A. Elliott to design the power plant, referred as the "Glendale Power & Light" or "Steam Electric Generating Plant" (**Figure 2**) (LA Conservancy 2015).

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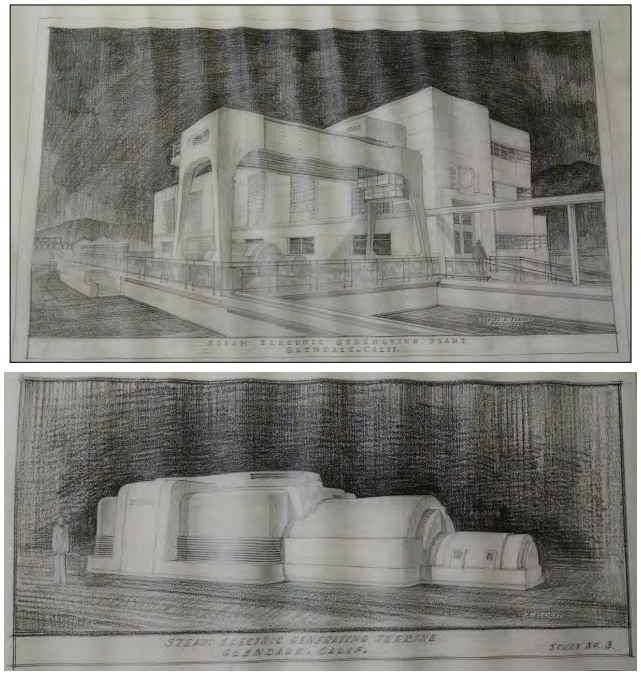

Figure 2. Original Daniel Elliott renderings show the exaggerated streamline moderne details, much of which did not make it onto the building.

Elliott designed the boiler structure in the Streamline Moderne-style, built to house two boilers (Boilers 1A and 1B). Located outside on a full length concrete pedestal were the generators, manufactured by Combustion Engineering Company Inc., New York and with Streamline Moderne detailing. Elliott was born in Las Vegas, New Mexico in 1898. He attended University of California at Berkley, earning an architecture degree in 1925. From 1925 through 1932 he served as a designer at the Los Angeles architecture firm of Gilbert Stanley Underwood before getting his architecture license and becoming an architect at the Metropolitan Water District of Southern California. He remained at the water district from 1932 through 1939. During World War II he worked at Hoover and Montgomery, a firm that specialized in water-related construction projects. Following the end of the war he formed his own architecture practice, one he

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maintained until his retirement in 1962. Principle examples of his work are water focused designs most notably the Colorado River Aqueduct Pumping Plants and F.E. Weymouth Memorial Water Softening and Filtration Plant completed in 1939 (**Figure 3**) and the Burbank Water & Power administrative building in 1949 (LA Conservancy 2015; AIA 1956: 155).

Elliott's original design laid claim to being the world's first earthquake-proof plant, with a 22 foot deep concrete basement, turbo-generator on an uncovered open deck with a metal covering over the generator from to protect from inclement weather, and a building shell built of light steel and stucco filler walls (Los Angeles Times 1940). At its start-up in 1941, the plant produced 20,000 kilowatts of power. The city had already secured funding for a second unit set to be added in 1945 (Lost Angeles Times 1941; Glendale Public Service Commission 1951). To meet increasing demands for electricity, a second unit was added in 1947, which included an additional 20,000-kilowatt generator and single boiler increasing the plant's combined kilowatt capacity of 40,000 kilowatts (Glendale News Press 1953e; Glendale News Press 1953f; and Glendale Public Service Commission 1951).

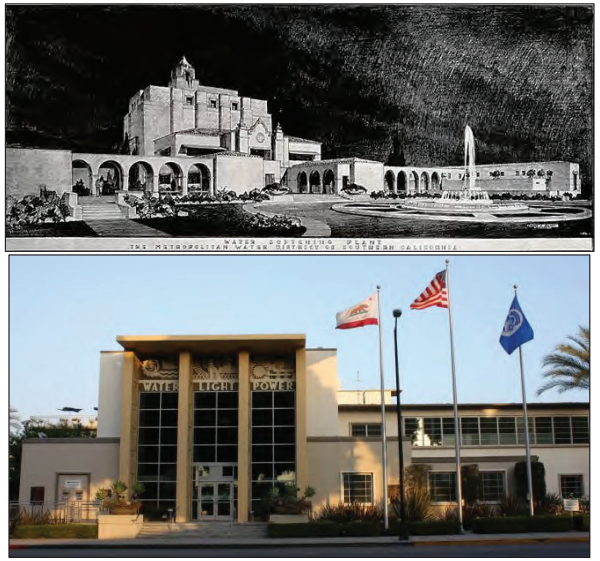

Figure 3. Top, the 1939 Metropolitan Water District of Southern California Water Softening Plant in La Verne and below the Burbank Water Light and Power Administration building built in 1949.

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As demand increased a third unit were added in 1953, which constituted the first of several additions to the boiler building on its north end; the third unit at the plant was completed at a cost of over $3 million. The integral furnace boiler and superheater steam boiler was manufactured by the Babcock & Wilcox Company and the turbine generator by General Electric. The company of Foster & Wheeler constructed the cooling tower and provided the condenser for Unit 3. Unit 3 also utilized the most up-to date engineering replicated in fuel-fired plants across California. The turbine for Unit 3 is located outside the main building under a removable housing (Glendale News Press 1953e).

California utility companies' steam generating capacity expanded during the period of 1950 through 1970. PG&E operated 15 steam electric plants in 1950. Conversely, Southern California utilities built large steam plants at a much slower rate than with Northern California, constructing the Valley Steam Plant in 1953 and Scattergood Steam Plant in 1957. By the late 1970s, there were more than 20 fossil fuel steam-generating plants in California owned by various power companies and clustered near urban areas such as San Francisco Bay, the greater Los Angeles area, San Diego County, along with a few interior plants in San Bernardino, Riverside, and Imperial Counties. Happening concurrently, in the mid-1960s large scale intertie projects such as the 500 kV California Oregon Intertie (also known as Path 66) were completed. Additionally, utility companies began to pool their resources, creating a larger interconnected grid. Dictated by Federal power policy, utility companies came together to form bulk transmission entities. In 1967, the Western Systems Coordinating Council formed, consisting of 40 power systems located in western states and remained in existence until 2002 when it merged with three regional transmission associations forming the Western System Coordinating Council (WSCC). In addition to WSCC in the mid-1960s was the California Power Pool. This entity gave rise to the current California Independent Service Operator (CAISO). These large intertie projects brought the death of independent, locally sourced electricity as CAISO and its predecessors controlled operation of the various plants (Transmission Agency of Northern California 2017; Water and Power Associates 2017); Southwest Builder and Contractor 1962).

Between 1953-54, the plant generated a total of 122,649,440 kilowatts per hour, supplemented by electricity generated at Hoover Dam, supplied all the power needed for the City (Glendale Public Service Commission 1951). Five more units were constructed after 1953 including Unit 4 (1959), Unit 5 (1964), Unit 6 (1972), and Unit 7 (1974). The boiler for Unit 4 was manufactured by Riley Stoker Corporation; Unit 6 was manufactured by General Electric; and Unit 7 by the Curtiss-Wright Company. Units 1 through 3 maintain Elliott's the style aesthetics, however the structure shape and detailing shifts with the addition of Units 4 & Unit 5, to a significantly taller, less detailed utilitarian structure that we see to the north. As the building was expanded north, lower level fenestration of the first three phases was repeated but without the vertical glass block panels. Little significant architectural detail was included in Unit 4 & Unit 5's building expansion. In 1972 The plant was renamed the "L.W. Grayson Steam-Electric Generating Station" after the City of Glendale General Manager and Chief Engineer, Lauren W. (L.W.) Grayson who at the time was the longest serving employee. Grayson accepted a position at the City of Glendale in 1951 (City of Glendale 1972; Glendale News-Press 1972). His most notable achievement was in bringing power to Southern California through the Pacific Northwest Intertie (Glendale News-Press 1972).

Unit 8 (Unit 8A, 8B, and 8C) was constructed in 1977 and was one of the last to be installed at the power plant and the most efficient of the group while producing fewer emissions than the earlier generators at the plant (Cook 1977). Initially, it was called a "combined cycle repowering unit" in producing more energy and fewer emissions with conventional units that provide better combustion controls and higher efficiency

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(Cook 1977). The new system cost $20 million dollars and at the time, lessened air pollution (Ralph 1977). Further environmental improvements to the plant resulted from the construction of a phosphate removal and treatment plant in 1978. The treatment plant was connected to the steam plant by a pipeline, which directly pumps the reclaimed water into the Grayson Power Plant's cooling towers (Rees 1978). In addition, since 1994 the plant has utilized methane gas from the Scholl Canyon Landfill mixed with natural gas to generate power in Units 3, 4, and 5 (Scholl Canyon Landfill 2015).

Continuous improvements in efficiency and power generation capacity have been one of the priorities at the Grayson Power Plant throughout its history including the construction of a new 50 megawatt power generator was completed in 2004, at a cost of $33.5 million dollars, replaced two of the older, outdated units. The new structure consists of a generator, a gas turbine and compressor, and an emissions control tower to filter out pollutants throughout the system. The generator runs entirely on computers and operates during peak hours (Moskowitz 2004).

In July 2010, a fire at Cooling Tower 3 caused severe damage to the structure, although service was not effected (Wells 2010). Repairs to other portions of the plant included the replacement of the superheater tubes in Boiler No. 4 in 2001, wall tubes in Boiler No. 4 in 2011, an upgrade of the burner management and boiler control systems, also in Unit 4 in 2011, among other updates (City of Glendale 2011). According to the City of Glendale, California Report to the City Council in April 2014, the boilers for Units 1 and 2 have been mothballed (City of Glendale 2014). In 2015, the Glendale City Council commissioned plans to upgrade Grayson Power Plant to make the plant more efficient, reliable and cost effective. According to the June article in the Glendale News-Press, seven of the eight turbines would be decommissioned and replaced by 4 more efficient turbines, which would be able to produce power more quickly (Mikailian 2015). Currently the power plant generates approximately 18% of the power needed for the City of Glendale with the remaining power coming from a combination of both local and remote generation (owned and leased), coupled with spot market purchases from a variety of suppliers throughout the Western United States (Mikailian 2015).

Evaluation

Glendale's Grayson Power Plant served as a regional power source since construction. While the power plant has maintained this role, it has not directly contributed to the early growth of the city, further it only supplemented electricity supplied by other utilities and by the 1937 constructed Hoover Dam. The power plant did supply the region with localized power, however, it is just a continuation of existing power supplies. By the time the power plant came online, in 1941, the city had been electrified for 32 years. Further, articles exaggerated the need for a localized power plant to sustain growth. Supply was high, the city, understandably preferred control of their own power supply. California, like much of the west had begun interconnection a series of previously independent transmission systems into an interconnected grid. When originally conceived, the plant would provide a localized source of power, however by the 1940s the state had already begun interconnection. Further, fuel-fired steam plants were well established across California by 1941, that utilized proven technologies. The Grayson Power Plant as first constructed in 1941 represented the designs of the 1920s, this was soon realized as the plant underwent numerous upgrades and additions through the 1940s, 1950s, 1980s, 1970s, and 1980s to keep pace with the larger, semi-outdoor boiler types that proliferated across California in the 1950s and 1960s. Therefore, Grayson Power Plant is ineligible, under NRHP Criteria A, CRHR Criterion 1 and GRHR as it is not associated with important events in national,

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state, or city history, or exemplifies significant contributions to the broad cultural, political, economic, social, or historic heritage of the nation, state, or city. Rather, the plant is a continuation of electrical generation themes in a city that had been using electricity for 32 years.

There is no evidence that Grayson Power Plant has any important association with any person or persons who made significant contributions to history at the local, state, or national level. It was designed to supplement and create a localized power source that involved several key institutions and individuals. Research did not reveal any notable figures specifically associated with the alignment or its related infrastructure, and research did not indicate the potential for significant associations in this regard. While the power plant is currently named Grayson Power Plant for L.W Grayson, a longtime Glendale employee. The name change, occurred in 1972, was in recognition of Grayson 19 years of service to the city. Grayson was important in management of the city but had no association with development, construction, or early operation of the plant. The power plant is not eligible under NRHP Criteria B, CRHR Criterion 2 or for the GRHR.

The subject property is not eligible for NRHP Criteria C, CRHR Criterion 3 nor the GRHR. Grayson Power Plant when originally constructed as a small, two-unit boiler house with Streamline Moderene styling. Since originally constructed, the power plant main boiler building has undergone numerous additions and alterations. These additions, mimic Elliott's design but with each addition are farther removed from the original (**Figure 4** and **5**).

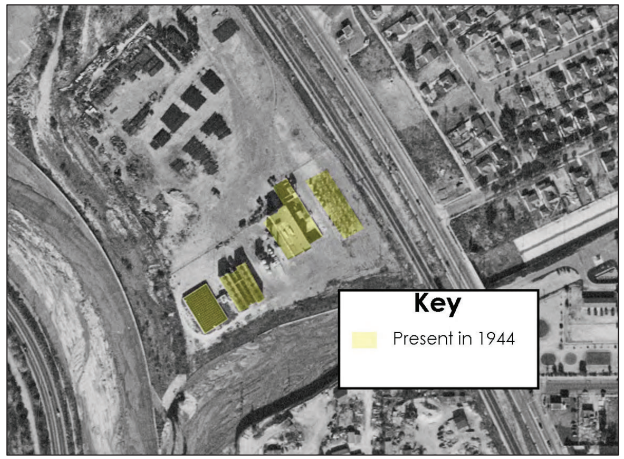

Figure 4. Glendale Steam Electric Power Plant Property in 1944.

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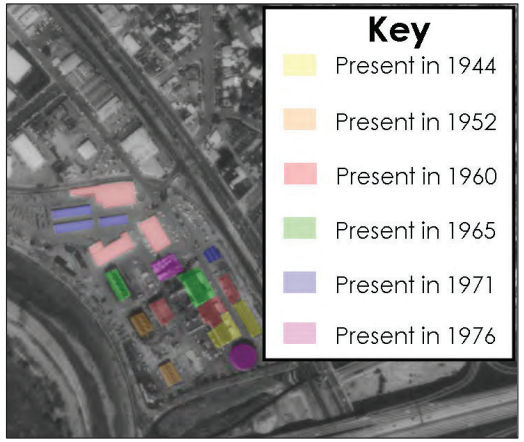

Figure 5. A graphic showing the numerous plant modifications since construction in 1941. The information is overlaid on a 1976 aerial with changes noted on historic aerials in 1944, 195, 1960, 1965,1971, and 1976.

Daniel Anthony Elliott, who is arguably a master architect. His noteworthy designs focus on water related infrastructure including the Colorado River Aqueduct Pumping Plants and F.E. Weymouth Memorial Water Softening and Filtration Plant completed in 1939 (**Figure 3,** above) and later the Burbank Water & Power administrative building in 1949. The F.E. Weymouth Memorial Water Softening and Filtration Plant is the earliest extant example of Elliott's work, further it is the best example of monumental water and power architecture. Built in a Spanish Revival design, this building exemplifies the style, prominent of the time and best showcases Elliott's ability to make infrastructure into beautiful architecture. They original design of the Grayson Power Plant followed these design tenants. Elliott used prominent architectural styles on infrastructure. Elliott's design followed established power plant and substation design principles emblematic of the 1910s and 1920s. Power company architects designed substations and powerhouses in prominent public-building architectural styles like Beaux-Arts and Classical Revival. Urban power houses and substations housed the electrical equipment within buildings in order to accommodate the congested urban surroundings and to buffer the public from the sounds and activities associated with operation. The power plants and substations were constructed to meet both aesthetic and functional mandates (Frickstad 1916). Elliott's design of the Streamline Moderne power plant is a 1940s continuation of these design principles. Further, the 1941 building designed by Elliott has been manipulated and changed beyond his original vision through multiple building modifications. Further, the F.E. Weymouth Memorial Water Softening and Filtration Plant is far more intact example of his early designs.

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An article noted its design as earthquake resistant meaning its generators were located outside on a concrete foundation that was resistant to earthquakes with metal coverings to protect it from weather. R.R. Martell, noted earthquake engineer consulted on the project stating the generator could be constructed outside the main boiler building. Through time the power plant has withstood earthquakes, as have other power plants with varied designs. This design is important in the greater advancement of power plant designs. Unfortunately, multiple additions and modifications have degraded its integrity and it can no longer convey this significance under NRHP Criteria C or CRHR Criterion 3. As noted before, the GRHR does not assess integrity. The evolution of earthquake resistant power plant is important to the context of power plant design in California, however it's within the context of Glendale is lessened.

The property does not appear likely to yield significant informational associations under NRHP Criteria D, CRHR Criterion 4 or the GRHR as the plant does not yield information important to archaeological pre-history or history of the nation, state, region, or city. In contrast, the extant archival record regarding the site presents a wealth of specific and informative material, including maps, photographs, aerials, and building permits that provides significant material for interpretation. Thus, the extant physical structures of the site do not convey significant informational material that would inform the rather robust archival record regarding the Grayson Power Plant.

The Grayson Power Plant was constructed approximately 60 years after the early development of the City of Glendale and 35 years after the City incorporated electricity in 1906. Due to this passage of time it is not associated with the early heritage of the City and not eligible for listing on the GRHR.

While the GRHR does not account for integrity, both the NRHP and CRHR do. Due to numerous building additions and continued evolution of the property there has been a loss of integrity of design, materials, workmanship, and feeling. The property retains integrity of location, setting, and association. The power plant has not moved, the overall setting has remained industrial, and it maintains its association as a power plant. However, numerous alterations have removed its integrity of design to the original plant conceived by Elliott, materials as the building materials, while similar are different in type and massing from the original section. The plant has lost its association of workmanship as the additions have fundamentally altered the physical characteristics of the building as original constructed in 1941 and finally the plant has lost its original feeling. Aside from the numerous building additions continued addition of non-attached boiler units with modern cooling towers and ancillary buildings have removed the original feeling of the property. Therefore, the building has lost integrity coupled with lack of significance the building is not eligible for the NRHP or CRHR under any criterion.

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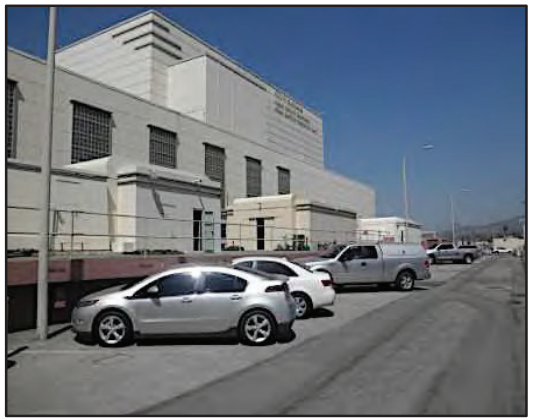

Photograph 2. Grayson Boiler Building, View Looking Northwest (Photo by J. Terry).

Photograph 3. Grayson Boiler Building, View Looking Northwest (Photo by J. Terry).

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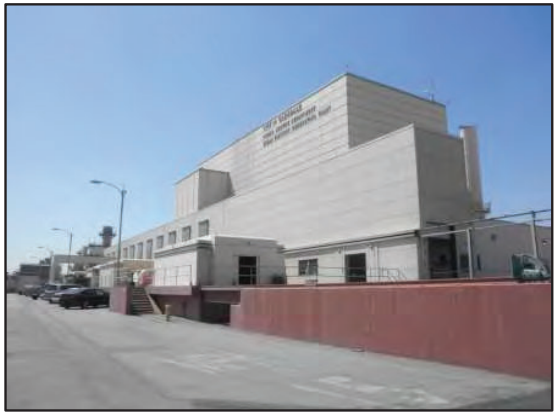
Photograph 4. Grayson Boiler Building, View Looking Southwest (Photo by J. Terry).



Photograph 5. Grayson Boiler Building, View Looking Southeast (Photo by J. Terry).

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Photograph 6. Boiler Stacks (Boilers 1 and 2 Center Rear of Photograph; Boiler 3 to Left), View Looking South. (Photo by J. Terry).

Photograph 7. Overview of Basement Floor Level, View Looking North (Photo by J. Terry).

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Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

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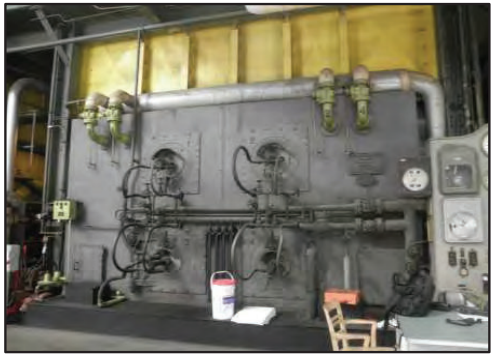

Photograph 8. View of Boiler 1B, Looking West (Photo by J. Terry).

Photograph 9. Unit 8A, Looking West (Photo by J. Terry).

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Photograph 10. Units 8A & 8B, View Looking Northeast (Photo by J. Terry).

Photograph 12. Cooling Tower No. 2 (No. 1 in background), View Looking Southeast (Photo by J. Terry).

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Photograph 13. Cooling Tower No. 3 (No. 5 in Background), View Looking Northwest (Photo by J. Terry).

Photograph 14. Cooling Tower No. 4, View Looking Northeast (Photo by J. Terry).

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Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

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Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

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Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

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LOCATION MAP

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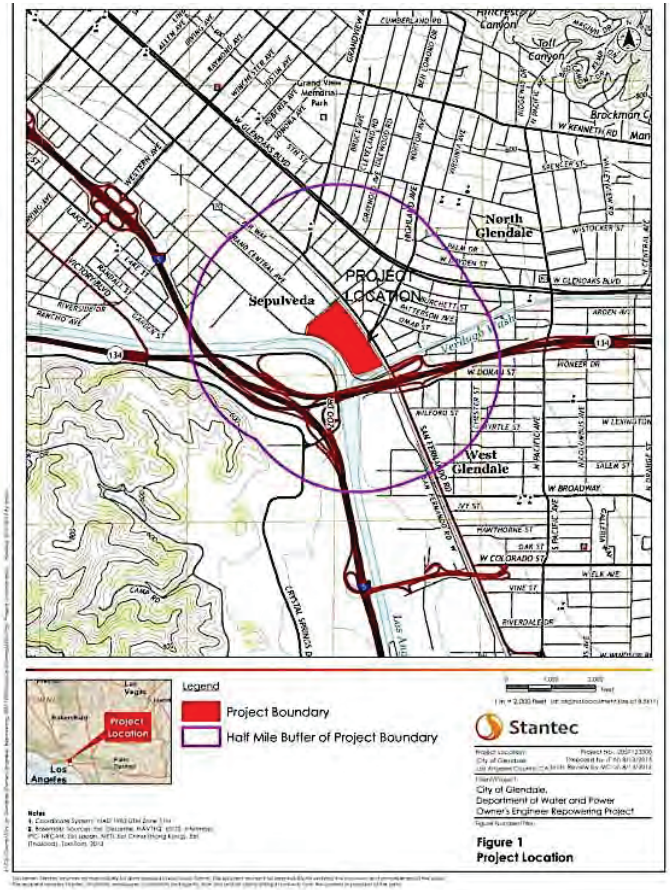
Page 25 **of** 25 ***Resource Name or #** (Assigned by recorder) Grayson Power Plant
***Map Name:** Grayson Power Plant Location Map ***Scale:** 1:24,000 ***Date of map:** 2015



DPR 523J (9/2013)

*Required information

HISTORIC RESOURCE INVENTORY AND EVALUATION GRAYSON POWER PLANT FOR CITY OF GLENDALE, CALIFORNIA

Appendix B RECORDS SEARCH AND URS CORPORATION 2002 IS/MND TECHNICAL CULTURAL RESOURCES REPORT

Appendix B~~RECORDS SEARCH AND~~ URS CORPORATION 2002 IS/MND TECHNICAL CULTURAL RESOURCES REPORT

THIS APPENDIX HAS BEEN OMITTED FROM PUBLIC DISTRIBUTION AS IT CONTAINS CONFIDENTIAL CULTURAL INFORMATION/DATA

Stantec

B.1

Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020) - Continued

Response to Submission 894 (Erik Krause, City of Glendale: Community Development Planning, September 2, 2020)

894-1746

The commenter provides a detailed narrative of why the Grayson Power Plant should not be considered eligible for the National Register of Historic Places. The Burbank to Los Angeles Project Section Historic Architectural Survey Report (Authority and FRA, 2019) recommended that the L.W. Grayson Steam-Electric Generating Station, within the Glendale Water &Power Utility Operations Center at 901 Fairmont Avenue in Glendale, is eligible for the NRHP and the CRHR at the local level of significance under Criterion A/1 for its association with developmental history of power generation in Glendale. The State Historic Preservation Officer (SHPO) concurred on this determination on May 2, 2019. However, the commenter provided information related to the City of Glendale's 2018 recommendation that Grayson Power Plant not be considered eligible for listing on the NRHP, CRHR, or Glendale Register of Historic Resources due to lack of integrity of the structures. Given this new information regarding the lack of integrity, the Authority submitted a report to SHPO for reevaluation of the Grayson Power Plant as "ineligible" for listing and the SHPO concurred on December 3, 2020. The Authority has revised the previous determination in the Draft EIR/EIS to reflect a determination of "ineligible" for listing in Section 3.17.6.2 of this Final EIR/EIS.

Submission 654 (Eddie Guerrero, City of Los Angeles Department of Transportation, June 24, 2020)

Burbank - Los Angeles - RECORD #654 DETAIL

Status :	Action Pending
Record Date :	6/24/2020
Submission Date :	6/24/2020
Interest As :	Local Agency
First Name :	Eddie
Last Name :	Guerrero

Stakeholder Comments/Issues :

654-671 Hello my name is Eddie Guerrero, I'm a staff engineer with the City of Los Angeles Department of Transportation and I'm using this phone phone number from the ashley-rep(?) project website to request and an electronic copy of the transportation technical report. If it's possible obviously I would like to have that emailed to my city email address is Eddie EDD IE dot Guerrero gerrerover@lacitylaciti.org.org. Thank you. Bye.

Response to Submission 654 (Eddie Guerrero, City of Los Angeles Department of Transportation, June 24, 2020)

654-671

The commenter requested an electronic copy of the Transportation Technical Report. The commenter was forwarded a copy of the report on June 24, 2020. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020)

CITY OF LOS ANGELES
CALIFORNIA

Seleta J. Reynolds
GENERAL MANAGER

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
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ERIC GARCETTI
MAYOR

August 31, 2020

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

CALIFORNIA HIGH SPEED RAIL DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT (EIR/EIS), BURBANK TO LOS ANGELES SECTION – LADOT COMMENTS

Dear Ms. Ricard:

The City of Los Angeles Department of Transportation (LADOT) appreciates the opportunity to review the Draft Environmental Impact Report/Statement (EIR/EIS), dated May 2020, for the proposed California High Speed Rail – Burbank to Los Angeles Section (Project). Representatives of the California High Speed Rail Authority (HSRA) have been very helpful throughout the last few years in updating LADOT and other City departments on the progress, design considerations, and alignment challenges of the project. So, we also note our appreciation of this engagement effort and we look forward to working with the HSRA to move this important regional transportation project forward.

According to the project description, the Burbank to Los Angeles Project Section would be implemented largely within the existing railroad right-of-way, which is approximately 100 feet in width throughout the corridor and 70 feet in width at constrained areas which may require the acquisition of additional right-of-way. The Build Alternative would be grade-separated to eliminate at-grade crossings by implementing new roadway overcrossings or undercrossings.

As noted in Section 3.2.4.1, Definition of Resource Study Area (RSA), the RSA includes 243 study intersections and 37 study roadway segments with close to 60% of the study intersections being located in the City of Los Angeles. Given the scale of this analysis, it is expected that some details would be overlooked, particularly when this is our first opportunity to review a highly technical analysis after a significant change in how transportation analyses are processed under CEQA per Senate Bill 743. As you will see in the comments provided below, it is LADOT's opinion that there are gaps in the analysis that need to be addressed. Until we have these additional analysis results, we respectfully request another opportunity to review and comment on the full transportation analysis of this Project, when it is completed, prior to preparing the final environmental report.

890-1834

AN EQUAL EMPLOYMENT OPPORTUNITY – AFFIRMATIVE ACTION EMPLOYER

In addition to the comments offered below, LADOT provides detailed technical comments in Attachment A, comments submitted by the City's interdepartmental working group pursuing the revitalization of the Los Angeles River in Attachment B, and a previous correspondence from Los Angeles City Councilmember Gilbert Cedillo to the HSRA, dated September 25, 2018, as Attachment C.

TOPICAL COMMENTS

LADOT Operational Analysis - In December 2018, the State adopted updates to CEQA guidelines that included a change to the transportation impact metric from delay/Level of Service (LOS) to Vehicle Miles Traveled (VMT). On July 30, 2019, the Los Angeles City Council followed suit and adopted new transportation assessment guidelines and VMT-based impact thresholds. During preparation of the new CEQA guidelines, the State's Office of Planning and Research stressed that agencies can continue to apply traditional operational analysis requirements to inform transportation project decisions provided that such analyses were outside of the CEQA process. Therefore, in addition to VMT analysis, projects within the city of Los Angeles are required to include access and circulation analyses outside of the CEQA process to address any operational concerns and deficiencies.

890-1835

The Project DEIR/DEIS does include traditional LOS operational analysis; however, some key intersections were omitted from analysis and corrective actions to address congestion and potential queues were not proposed. Any deficiency identified in the Project's operational analysis are deficiencies that the City expects the Project to address, as feasible, and should be reflected as such through the report. It should also be noted that said improvements are subject to the review and approval of LADOT. Additionally, the operational "impact" thresholds identified in both the DEIR and Transportation Technical Report documents are not in line with previous or current LADOT Transportation Assessment Guidelines (TAG). Therefore, in order to appropriately address this discrepancy, the Project should complete an additional discussion with LADOT to identify the appropriate methodology for correcting the analysis prior to completing the project final EIR.

890-1836

Project Street Closures and Reconfigurations – There is no discussion of how planned project street closures and reconfigurations are being addressed in the operational analysis. For example, several of the intersections that would be most affected by the proposed North Main Street overpass were not identified for analysis. This detail should be addressed in text and graphically in the intersection lane configuration details of the transportation analysis appendix.

890-1837

Community Impacts – There is no discussion in the EIR about the potential impact of cut-through traffic on project adjacent neighborhoods due to street reconfiguration proposals such as the new North Main Street overpass. In order to ensure appropriate redress on this issue, the analysis should provide this review and include consideration of a potential neighborhood traffic management plan (NTMP), if one is deemed necessary, to address cut-through traffic impacts.

890-1838

Los Angeles Union Station Forecourt/Esplanade Project – It does not appear that the Project's transportation analysis included the roadway changes expected from the planned Union Station Forecourt/Esplanade Project, which the Project did identify as a related project. The lane reconfigurations resulting from this project along Alameda Street and Los Angeles Street should be reflected in the future scenarios. Please confirm and make corrections to the analysis as appropriate.

Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

Los Angeles River – Revitalization of the Los Angeles River is a key goal of the city of Los Angeles. An interdepartmental team within the City was established to help realize the vision of a Los Angeles River that provides natural, community, and economic resources that can revitalize adjacent neighborhoods. A number of the City's priorities, projects, and plans may be directly or indirectly impacted, and in some cases precluded, by the Project. Please refer to Attachment B for a full discussion of the City's concerns and comments related to the Los Angeles River.

890-1839

SPECIFIC COMMENTS

Refer to Attachment A for specific questions and comments regarding both the Transportation Section (3.2) of the EIR and the Transportation Technical Report.

GENERAL COMMENTS

Report Readability – There appear to be some inconsistencies in the presentation of information that requires attention and potential revisions to the EIR/EIS. The following are just a few examples of this issue:

Draft EIR/EIS – Transportation Chapter 3.2

890-1840

i. Section 3.2.4.1 (Definition of Resource Study Area), Figure 3.2-1 (Transportation Resource Study Area, Sheet 7 of 10) , does not identify Main Street and Clover Street as a study intersection but it is identified as location #1013 in Tables 6-19 and 6-24 of the project Technical Report. Yet, the intersection of Brunswick and Goodwin is identified in both documents making it difficult for the reader to understand.

890-1841

ii. Section 3.2.5.3 discusses existing Traffic Conditions including a level of service (LOS) assessment but instead of including the summary table of information that provides the basis for this discussion, the reader is referred to a separate technical document making it very cumbersome to confirm the accuracy of the information being presented.

890-1842

Transportation Technical Report

i. Similar to the study intersection identification and presentation issue discussed above (in comment ii), the intersections Wilhardt and Main (#164) and Gibbons and Main (#223) are identified as study locations in Figure 4-1 (sheet 6) and included in various summary analysis tables even though these locations will no longer be primary intersections when the new Main Street overpass is constructed as part of the project. So, without appropriate discussion, it is again confusing as to how information is being presented.

CONCLUSION

890-1843

LADOT supports the Project and sees it as an important regional enhancement that can help reduce the State's overall greenhouse gas emissions and VMT, reduce airport congestion, and modernize rail travel.

890-1844

Nonetheless, we recommend that additional analysis be conducted to address potential local operational deficiencies that may arise as a result of the project, and to fully consider how the Project may impact the Los Angeles River, its watershed, and existing, ongoing, and planned projects to revitalize the River and its corridor. Therefore, in order to ensure the best possible strategy for fully

890-1844

addressing the potential impacts of this project, the HSRA should engage LADOT and City staff to discuss the various comments provided in this review prior to moving forward with the development of the final environmental impact report.

If you have any questions, please contact Eileen Hunt at Eileen.Hunt@lacity.org.

Sincerely,

Edward Guerrero Jr.
Senior Transportation Engineer

Attachments

c: Doug Mensman, Mayor Garcetti's Office
Michael Affeldt, Mayor Garcetti's Office
Gerald Gubatan, Council District 1
Katie Kiefer, Council District 14
Shirley Lau, Bureau of Engineering
Conni Tipton-Pallini, Department of City Planning

Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

ATTACHMENT A

HSR EIR/EIS – TRANSPORTATION TECHNICLAL REPORT
LADOT REVIEW – SPECIFIC COMMENTS

	Page	Reference	Concern	Comment	HSR Response
	Comment 1 Resource Study Area				
890-1845	DEIR/EIS Vol 1 Pages 3.2-12 to 13	3.2.4.1 Definition of Resource Study Area "The RSA includes 243 study intersections and 37 study roadway segments. Figure 3.2-1 (Sheets 1 through 10) depicts the RSA and displays the study intersection numbers corresponding with Table 3.2-4." Table 3.2-3 Definition of Resource Study Areas	- The RSA does not include intersections and roadway segments affected by the new Main St Overpass. - The Main St Overpass will realign Albion St connecting to Lamar St and Gibbon St; realign Avenue 17 connecting to Mozart St, Darwin Ave, and Main St; create new intersections including: Lamar St and Clover St; Clover St and Main St; and Ave 17 & Main St.	- To better understand local access and circulation resulting from the street reconfiguration required by the new Main St Overpass, the RSA should also include the following locations as study Intersections: Lamar St & Clover St/New St Ave 17 & Mozart St/Darwin Ave, Ave 17 & Main St Clover St & Main St Ave 19 & Main St Moulton Ave & Main St Ave 21 & Main St Ave 20 & Darwin Ave Ave 19 & Darwin Ave Ave 17 & Albion St Main St & Sotello St Study Roadway Segments North of Main St: Avenues 18, 19, and 20 North and south of the Main St Overpass: Gibbon St, Lamar St, and Clover St Main St east of Clover St	-
	TTR Pgs 5-24 to 5-26	Figure 5-5 Study Intersections in Vicinity of Los Angeles Union Station			
	Comment 2 Impacts and LOS				
890-1846	TTR Pg 4-22 Footnote 10 Section 4.4.3	The most recent guidance received indicates that although local agency criteria should be considered and documented, locally-adopted criteria do not apply to this regional project. The following are the project traffic analysis criteria for signalized and unsignalized intersections, and roadway segments, as defined in the Project EIR/EIS Environmental Methodology Guidelines, Version 5 (Authority 2014).	Construction Impacts are organized as Impacts TR#1, TR#2, TR#3, TR#4, TR#5. Operations Impacts are organized as Impacts TR#6, TR#7, TR#8, TR#9, TR#10, TR#11, TR#12 TRAN-MM #1 identifies improvements that would reduce construction impacts TR#1 (Signalized Intersections) and TR#2 (Unsignalized Intersections). TRAN-MM#2 identifies improvements that would reduce operation impacts TR#7 Signalized Intersections) and TR#8 (Unsignalized Intersections). The identified improvements are deemed not applicable since the impacts were based on LOS.	During preparation of the new CEQA guidelines, the State's Office of Planning and Research stressed that lead agencies can continue to apply traditional operational analysis requirements to inform land use decisions provided that such analyses were outside of the CEQA process. While LADOT agrees that the project should result in regional VMT reduction benefits, local access and operational concerns should still be addressed. Therefore, LADOT recommends that the HSRA work with the City to identify suitable traffic management strategies to offset any safety and operational issues at intersections and roadways affected by construction-related activities.	
	DEIR/EIS Vol 1 Section 3.2.6 Pg 3.2-48	T 3.2.6 Environmental Consequences This section evaluates how the No Project Alternative and the HSR Build Alternative could affect transportation. As previously discussed, the analysis of CEQA impacts reflects			

Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

	Page	Reference	Concern	Comment	HSR Response
	Pg 3.2-57-59, 74, 77,79,99 Pg 3.2-81 Pg 3.2-99	California's shift in transportation impact analysis away from a focus on automobile delay (most commonly analyzed in terms of LOS) to a focus on VMT. The analysis of NEPA impacts includes LOS. CEQA Conclusion for impacts TR#1, TR#2, TR#3,TR#7, TR#8, and TR#9: This threshold is not applicable to CEQA because LOS is no longer the performance standard for transportation impacts for CEQA 3.2.7 Mitigation Measures The Authority has identified mitigation measures TRAN-MM#1 and TRAN-MM#2 for impacts under NEPA and mitigation measure PR-MM#4 for impacts under both NEPA and CEQA that cannot be avoided or minimized adequately by IAMFs. Table 3.2-37 Summary of CEQA Significance Conclusions and Mitigation Measures for Transportation			
890-1847	Comment 3 City of LA Study Intersections listed under City of Burbank				
	DEIR/EIS Vol 1 Pg 3.2-55, 58, 73, 90, 91	Table 3.2-17 Mitigation Available for Signalized Intersection Construction Impacts Included in TRAN-MM#1 Table 3.2-19 Mitigation Available for Unsignalized Intersection Construction Impacts Included in TRAN-MM#1 Table 3.2-25 Mitigation Available for Burbank Airport Station Area Signalized Intersection Impacts, Horizon Year (2040) Plus Project Included in TRAN-MM#2 Table 3.2-36 Secondary Impacts of Mitigation Measure TRAN-MM#2	Study Intersections are listed incorrectly under the City of Burbank	The following intersections should be listed under the City of Los Angeles: Int #7 Sunland Bl at San Fernando Rd Minor Int. #8 Sunland Bl at San Fernando Rd Int. #12 Vineland Ave at Vanowen St Int. #15 Strathern St/Clybourn Av at San Fernando Rd Int. #28 Hollywood Way at I-5 SB Ramps Int. #1 SR 170 Southbound Ramp at Victory Bl Intersection shared between City of Burbank and City of Los Angeles: Int. #96 Hollywood Way at Cohasset St	
890-1848	Comment 4 Improvements in the City of LA				
	DEIR/EIS Vol 1 Pg 3.2-55, 58, 71-73. 76-77	It is reasonable to expect that the applicable city would assume the right-of-way and maintenance responsibilities for any improvements identified in TRAN-MM#1 or MM#2 such that the mitigation measure is feasible.	There is no discussion regarding the design and construction of the improvements if they are implemented.	Any improvements in the City of LA should be reviewed and approved by LADOT and processed through the City's Bureau of Engineering B-permit process.	

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	Page	Reference	Concern	Comment	HSR Response
	Comment 5 Grade Separation – Main St Overpass Plan				
890-1849	DEIR/EIS Vol 3 Pgs 122-139 California High-Speed Train Engineering Plans	Burbank to Los Angeles Vol 3 General & Grade Separations April 2019	The DEIR/EIS included plans for the grade separations but no transportation analysis regarding the new grade separation..	Construction of the Main St Overpass is appropriate to enhance a current deficient at-grade crossing condition, and would facilitate safe and efficient access. However, the design and construction of the Main St Overpass requires review and coordination with the City of LA. The EIR should include further discussion of the Main St Overpass in order for LADOT to better understand all local access and circulation implications resulting from the new connections to the overpass. Such a discussion should describe the potential delays queues, and safety concerns that would result if the overpass is constructed.	
	Comment 6: : Construction Analysis				
890-1850	DEIR/EIS, Vol 1, pg 29	Baseline Year and Analysis Scenario	Existing year analysis is based on 2015 data.	Given the 5-year lag in the 2015 Existing Baseline Condition, the Plus Project Construction analysis should be revisited to confirm that condition changes due to the time lag will not significantly change the analysis outcome.	
	Comment 7: Freeway Ramp Queuing				
890-1851	DEIR/EIS, Vol 1, pg 31		The project report states that a freeway on or off-ramp was evaluated for queuing impacts only if the HSR Project added more than 100 trips per hour to an individual ramp. However, LADOT's current guidance regarding freeway ramp operations suggest that further analysis may be required if Project trip activity is expected to add more than 25 net new peak hour trips to the ramp.	In order to bring the operational review in line with current LADOT guidance, it is recommended that queuing analysis be updated to reflect this direction. Section should also include a table listing of the With Project and Without Project freeway ramp volumes.	
	Comment 8: Street Segment Capacities				
890-1852	DEIR/EIS, Vol 1, pg 37	Table 3.2-8	For operational analysis purposes, street segment capacities do not typically have a range.	Suggest using a single range to complete this analysis.	
	Comment 9: Metro Los Angeles County CMP				
890-1853	DEIR/EIS, Vol 1, pg 5	Table 3.2-2 Regional and Local Plans and Policies	Remove from list.	Program is no longer active.	

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Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

HSR BURBANK TO LOS ANGELES DRAFT EIR/EIS

CITY OF LOS ANGELES COMMENT LETTER

ATTACHMENT B

COMMENTS SPECIFIC TO THE LOS ANGELES RIVER

Attachment B

General Comments

890-1854

The California High Speed Rail (HSR) Authority, in planning and analyzing its potential alignment through the City of Los Angeles and the Los Angeles River corridor, must be responsive to existing adopted planning documents, including but not limited to:

Los Angeles River Revitalization Master Plan (LARRMP) (2007)
Los Angeles River Ecosystem Restoration Project/Feasibility Study Recommended Plan ("Ecosystem Project") (2016)
Northeast Los Angeles (NELA) Riverfront Vision Plan (2014)
City of Los Angeles Mobility 2035 Plan (an element of the General Plan) (2016)
City of Los Angeles Sustainability Plan ("pLAn") (2015)
Plan for a Healthy Los Angeles (2015)
Cornfield Arroyo Specific Plan (CASP, 2014)

In recent years, Southern California staff of the High Speed Rail Authority have met with LARiverWorks team staff several times to discuss the project's interactions with the Los Angeles River and its existing and planned projects. LARiverWorks would like to thank current and former HSR staff for their collaboration and note that portions of these comments reflect the fruits of those discussions -- in particular the need to explore alternative grade separation approaches at the Taylor Yard and the critical need to provide east-west access to the River from communities to its east who would be separated from it because of the HSR's closed corridor requirements.

890-1855

A number of LA River priorities, projects, and plans for inclusion would be directly or indirectly impacted -- and in some cases precluded -- by the HSR project. Extensive action is necessary by the HSR project to address and mitigate the variety of impacts. The EIR/S document considers many of these direct and indirect impacts and proposes mitigations to reduce their significance. In many cases, these analyses and proposed mitigation strategies appear acceptable. However, in several key instances, the document is missing important impacts and topics entirely which must be addressed, analyzed, and mitigated appropriately.

The topics areas for which the EIR/S document insufficiently considers, acknowledge, analyzes, or proposes mitigations chiefly include:

- Taylor Yard G2 River Park Project as the document refers to it
- The Taylor Yard G1 property, known as the "Bowtie Parcel"
- Elements of the Los Angeles River Ecosystem Restoration Plan/Project
- Projects and actions planned in the Los Angeles River Revitalization Master Plan
- Access to the Los Angeles River and its existing and planned public spaces
- Wildlife movement

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Comments on the Taylor Yard Area

The Taylor Yard area is one of the most important sites along the Los Angeles River for open space, recreation, wildlife habitat, and other community-serving uses. The overall Taylor Yard area was once a more than 250-acre rail yard. After its decommissioning and parcelization, a number of other uses were implemented on the grounds. These comments specifically pertain to the approximately 100 acres that are comprised of the 42-acre G2 Parcel (owned by the City of Los Angeles), the 40-acre Rio de Los Angeles State Park (owned by California State Parks and co-operated by California State Parks and the City of Los Angeles), and the 18-acre G1 Parcel (owned by California State Parks and also known as the "Bowtie Parcel"). Planned projects at Taylor Yard include riparian and wetland habitat restoration, public open space, and community access, among other elements.

890-1856

To begin, the Taylor Yard G1 parcel is not correctly represented or analyzed in the EIR/S for the River-related projects that are planned for its location (see impact PK #3). Such project plans exist in the LARRMP, the Ecosystem Plan, and elsewhere. In fact, an image from the LARRMP is shown on 3.16-28 of the document that exhibits a rendering of planned open space projects over the 100-acre Taylor Yard area, including on the G1 parcel. Already, The Nature Conservancy is pursuing a project on the G1 site in partnership with California State Parks. Impacts to the G1 parcel must be addressed and mitigated if possible. It appears that the G1 parcel is not included in consideration of impacts to recreational, park, open space, or cultural resources, which should be corrected. Mitigations are likely appropriate for impacts to the G1 parcel during construction and operation of the proposed HSR project.

890-1857

A key goal in coordinating the multiple planned and active projects at the Taylor Yard are, as discussed in community meetings, the LARRMP, and the Ecosystem Project is to enable connection between the Rio de Los Angeles and G2 parcel sites. The EIR/S does not analyze the project's significant impacts to that objective nor

890-1858

propose mitigations. Just as significant investments have already been made and are further planned for grade separations for vehicles along the Burbank - Los Angeles segment, the connection of people and wildlife between these important resources should be included as an early action project. The Burbank - Los Angeles project team should undertake an analysis in collaboration with the City of Los Angeles and California State Parks to develop a concept for a grade separation of rail through the entire Taylor Yard area.

A possible approach that has been discussed with the HSR team is to establish a new lower grade for the tracking there that would dip though the site to allow for a sizable land bridge to be constructed over the track to link the Rio de Los Angeles State Park and G2 parcel sites to allow for human and wildlife movement. This would also lead to a different design for the bridge over the Metrolink Central Maintenance Facility access road or eliminate its necessity in favor of a different approach that uses the grade separation to allow for vehicle access. As the City's Bureau of Engineering leads the Taylor Yard G2 parcel project activities on behalf of the City of Los Angeles, the HSR project should contact its project management team to discuss a grade separation approach.

890-1859

A key goal in coordinating the multiple planned and active projects at Taylor Yard, as discussed in community meetings, the LARRMP, and the Ecosystem Restoration Project is to enable connection between the community and the LA River and planned parks. The HSR project perpetuates the disproportionately high and adverse human health and environmental effects to low-income and minority communities of Cypress Park and Glassell Park by increasing the size and frequency of trains into the area and further separating the community from the LA River and planned parks and natural areas leading to permanent noise, vibration, parks, and public service

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890-1859

impacts. The EIR/S does not sufficiently analyze the project's significant impacts to these communities nor propose adequate mitigation. Therefore, to offset these impacts HSR should assist the with the clean-up of the legacy railway pollutants at Taylor Yard to ensure the community can have a clean environment and safe access to the LA River, Nature, Parks and Open Space.

Comments on Specific EIR/S Sections and Passages

Summary

890-1860

- On page S-48, under S.8.2.13, it is asserted that though "...Construction of the HSR Build Alternative would also result in the permanent use of lands within Rio de Los Angeles State Park and Albion Riverside Park. However, the area of permanent use within each of these resources is minimal in size (permanent acquisition of 0.56 acre within Rio de Los Angeles State Park and a 0.12-acre permanent easement within Albion Riverside Park) and would not adversely affect the activities, features, or attributes of the recreational resources." Open space of any kind along the Los Angeles River is scant, crucial, and expensive to secure. Even an area of 0.56 acres or as little as 0.12 acres in size is important, and the assertion that activities and features would not be adversely affected is not supported by the context of scarcity of land. The HSR project must adopt approaches for the Taylor Yard area that enhance rather than detract from overall provision of park space and open space for the Los Angeles River corridor.

Chapter 1

890-1861

- On page 1-36 and elsewhere in the document, that /LA River Bike Path is not included as a referenced transportation system. In fact, the path is a 24-hour transportation facility for which segments are often funded with transportation dollars. All relevant analyses in the document must consider the entirety of the LA River path system, both existing and planned, as a transportation facility//project/system. The document's text does not indicate this was the case, therefore many transportation-related impact characterizations and proposed mitigations will need to be reconsidered. Moreover, it appears that in planning the project's facilities, not considering the LA River Bike Path as a transportation system has led to oversight in planning connections to that system for HSR users and its use as a connector system between other regional and local transportation modes. This oversight should be corrected.

Section 3.6 Public Utilities and Energy

890-1862

- The document appears to show that the existing oil pipeline that runs along the Taylor Yard area on the River side of the track would be permanently relocated to San Fernando Road. The LARiverWorks team would like to understand if this is an accurate understanding and also strongly suggests that this relocation be considered for an Early Action project. It is not clear what is proposed for oil pipelines along the alignment -- they should be relocated entirely to public rights of way.

890-1863

- Page 3.6-55 discusses a facility that is referred to above near Main Street as follows: Switching and paralleling stations would also be needed to balance the electrical load between tracks and to switch power off or on to either track in the event of an emergency. Switching stations would be required at approximately 15-mile intervals, midway between the TPSSs, and paralleling stations would be required at approximately 5-mile intervals between the switching stations and the TPSSs. For the Burbank to Los

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890-1863

Angeles Project Section, a switching station is proposed in the City of Los Angeles, south of Verdant Street and west of the railroad right-of-way, and a paralleling station is proposed in the City of Los Angeles, south of Main Street, between the railroad right-of-way and the Los Angeles River. This proposed switching station fails to recognize a feature of both the LARRMP and Ecosystem Plan that is planned to be implemented on the LA River's western bank just south of Main Street. The HSR project proposes construction that would be in direct conflict with the planned project and could preclude it from taking place. This is a conflict that the HSR project team must thoroughly analyze and for which mitigation, if possible, must be proposed.

Section 3.7 Biological and Aquatic Resources

890-1864

- As stated in section Impact BIO #11: Operation Effects on Wildlife Movement "Permanent Direct effects from daily train operation or regularly scheduled maintenance activities may interfere with wildlife movement…..Regularly passing trains may not provide enough undisturbed time between passing intervals for some wildlife species to cross the alignment in certain areas". The increase in the number of trains crossing will significantly increase the number of bird collisions and deaths in between the existing and planned habitat of the LA River and Taylor Yard and the adjacent Sonia Sotomayor Learning Academies and Rio de Los Angeles State Park. Birds at risk may include collisions and deaths of Bell's Vireo that occur in the LA River and at Rio de Los Angeles State Park. Therefore, a new mitigation measure is required to mitigate the impact and the HSR tracks should be lowered in this section between so that the tracks, and trains are hidden within a berm on either side which would allow birds to easily navigate between the tops of berms without colliding with trains.

890-1865

- Impact BIO #8: Operation Effects on Special-Status Wildlife states that permanent operations effects, which include noise, light, vibration, and wind generated from moving trains, would occur daily from operation of the HSR system and that the addition of HSR would be "additive to existing conditions" and the "indirect effects from noise, vibration, and wind could result in localized displacement of some special-status bird and bat species and "there would also be an increased potential for mortality from colliding with the moving trains" however the analysis is incorrect as it wrongly states that there are "limited extent of special-status wildlife species and habitat along the proposed HSR alignment" when at Taylor Yard and the G1 parcel, and along the adjacent LA River there are planned expansions of habitat including for species such as the least Bell's vireo. Therefore, a new mitigation measure is required to mitigate the impact and the HSR tracks should be lowered in this section so that the tracks and train are hidden within a berm on either side to reduce noise impacts on the wildlife and the potential for bird collisions.

Section 3.15 Parks, Recreation, and Open Space

890-1866

- The analysis fails to include analysis and evaluation of the State Parks-owned Bowtie Parcel adjacent to Taylor Yard G2 parcel. In addition, the analysis fails to address the long term operational impacts from additional tracks and trains that will significantly prevent the use of an established park, recreation, or open space, in particular the G1 "Bowtie" parcel, Taylor Yard G2, and Rio de Los Angeles State Park, due to the aesthetic, noise, vibration, and visual impacts from the project discouraging residents to use the park. Therefore a new mitigation measure is required to mitigate the impact and the HSR tracks should

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890-1866

be lowered in this section so that the tracks and train are hidden within a berm on either side to reduce noise and aesthetics and visual impacts on parks.

890-1867

- The document also does not address the significant impact of preventing the use of an established park, recreation, or open space, in particular North Atwater Park and Chevy Chase Park by closing Chevy Chase Drive. An additional mitigation measure should be added to minimize this impact by funding the design and permitting for the undercrossings of the East Bank Riverway between the 2 freeway and 134 freeway that will allow for alternative transportation access to the Parks.

890-1868

- Though the HSR EIR/S document gives ample attention to the major project of building a new grade separation at Main Street, it fails to recognize a feature of both the LARRMP and Ecosystem Plan that is planned to be implemented on the LA River's western bank just south of Main Street. The EIR/s makes clear that HSR project facilities are planned to be installed at the site between the River's bank and the track on the west bank, on a property that is owned by the City of Los Angeles Department of Water and Power. However, the EIR/S fails to acknowledge and consider that a project of the LARRMP and Ecosystem Plan is planned and underway on the same site. The HSR project proposes construction that would be in direct conflict with the planned project and could preclude it from taking place. This is a conflict that the HSR project team must thoroughly analyze and for which mitigation, if possible, must be proposed.

890-1869

- As page 3.15-34 notes, as part of a mitigation measure related to the LA River bike path, the future design-build contractor must develop routes and related other tasks. This instruction should also include the requirement to coordinate all mitigation actions for the LA River bike path with the City of Los Angeles and key stakeholders.

890-1870

- Page 3.15-38 notes that the "…construction of the HSR Build Alternative would require the permanent acquisition of approximately 1.6 acres of land within existing public right-of-way adjacent to the proposed Taylor Yard G2 River Park for improvements to the existing access road and underpass. These proposed improvements would not alter the function of the park because the improvements would only include work on the existing access road. Therefore, the project would not adversely affect the activities, features, or attributes of the property." However, the HSR team has not, to LARiverWorks' knowledge, conferred and coordinated with the Taylor Yard G2 team in sufficient detail to verify this statement. And in fact, 1.6 acres of affected land is a substantial portion of the 40-acre Taylor yard G2 parcel, especially with the context of extreme scarcity of LA River-adjacent land for improvement as open space, recreation space, and restored habitat. The conclusion of lack of significance must be reconsidered with the aid of collaboration with the City of Los Angeles Bureau of Engineering Taylor Yard project management team to identify specific impacts and potential mitigations.

Chapter 4 Section 4(f) Evaluation

890-1871

The Section 4(f) analysis is flawed as it ignores the LA River as a Park, Recreation and Refuge. The LA River is a designated Federal Navigable Waterway and in the area of the Glendale Narrows is a "Significant" and publically accessible resource that has existing and planned Park, Recreation and Refuge activities. It is also designated as part of the National Recreational Trail System and part of the Federal Rim of the Valley Special Resource Area. These include the existing recreation zone for boating, fishing, and walking that exists within the Glendale

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890-1871

narrows portion of the river managed by the Mountains Recreation and Conservation Authority. There is also established habitat within the channel of the LA River and at Rio De Los Angeles State park that have been identified as important bird areas. A revised Section 4(f) analysis is warranted and minimization and mitigation measures are required to ensure that the HSR "Constructive" impacts are reduced especially in the area of Rio de Los Angeles State Park and the Metrolink Central Maintenance Facility where new tracks will be directly adjacent to the LA River. Additional mitigation measures are required where the project will be adjacent to the existing LA State Historic Park.

890-1872

The Section 4(f) analysis ignores the impacts the HSR project will have on the recreation, parks and habitat refuges that the congressionally authorized U.S. Army Corps of Engineers LA River Ecosystem Restoration Project will implement, which includes restoring habitat along the banks and within the channel of the LA River from Griffith Park to 1st Street. Therefore, impacts at the Verdugo Wash, LA State Historic Park, Taylor Yard and Bowtie, and the western bank of the River from the Spring Street to Union Station need to be reevaluated. The HSR project will have significant impacts on planned recreation, park and habitat improvements along the western top of the bank and banks of the LA River between Spring Street and 1st street. The EIR/S also fails to and must acknowledge, characterize, and propose mitigations for potential impacts to the Downtown LA River Path Project by the Los Angeles Metropolitan Transportation Authority, which will bring active transportation facilities along the River from near the Arroyo Seco through and south of the City of Los Angeles.

890-1873

A revised Section 4(f) analysis is warranted and minimization and mitigation measures are required to ensure that the HSR "Constructive" impacts are reduced especially in the area of Taylor Yard and the Metrolink Central Maintenance Facility and LA State Historic Park. These mitigation measures may include permanent improvements to the public access along the banks of the LA River, additional habitat along the bank or within the channel, elevating the train tracks on trestles next to the LA State Historic Park to reduce the impacts to the planned hydrologic connections between the River and LA State Historic Park which is planned in the USACE and LA City LA River Ecosystem Restoration Plan.

Chapter 5 Environmental Justice

890-1874

The Environmental Justice section of the EIR/S does not sufficiently analyze the project's significant impacts to the identified communities nor propose adequate mitigation. A key goal in coordinating the multiple planned and active projects at Taylor Yard, as discussed in community meetings, the LARRMP, and the Ecosystem Restoration Project is to enable connection between the community and the LA River and planned parks. The HSR project perpetuates the disproportionately high and adverse human health and environmental effects to low-income and minority communities of Cypress Park and Glassell Park by increasing the size and frequency of trains into the area and further and permanently separating the community from the LA River and planned parks and natural areas leading to permanent noise, vibration, parks, and public service and community cohesion impacts. Therefore, to offset these impacts HSR should assist the with the clean-up of the legacy railway pollutants at Taylor Yard to ensure the community can have a clean environment and safe access to the LA River, Nature, Parks and Open Space.

Comments on Specific Impacted Projects from Adopted Relevant LA River Projects and Prior CEQA Documents

890-1875

Ferraro Fields Opportunity Area
LARRMP Project Number: 123
Other Planning Documents as Applicable: Hollywood Community Plan and Los Angeles River Ecosystem Restoration Recommended Plan
Description: The project will allow for public access to a revitalized River via a riverfront park. Ultimately the fields may be flooded and could allow for water recharge. By adding new riverfront elements to this existing significant green space, this project would be a grand sweeping example of revitalization by greening.
Potential Impact of HSR Project: The HSR project will add additional isolation from the River to the public. While this currently exists with the rail corridor, the addition of a closed HSR corridor will forever further restrict and potentially prevent access to the River.
Proposed Resolution of Impacts: The HSR project would further implementation of the opportunity area and minimize preclusion of restoration features by designing structures and project features to be compatible with a future confluence restoration, and establishing access to the River in the opportunity area by funding or constructing non-motorized bridges to access the area. More detail is needed on how the HSR project will achieve those goals.

Ferraro Fields River Park
LARRMP Project Number: 124
Other Planning Documents as Applicable: Hollywood Community Plan, Sustainability Plan, Los Angeles River Ecosystem Restoration Feasibility Study Recommended Plan
Description: The project will re-envision the existing park along the river that will allow for a mix of existing activities and adding open space and wetlands, coinciding with project 125.
Potential Impact of HSR Project: The project area is somewhat isolated from the River by eastside constituents by the rail corridor. The addition of a closed HSR corridor will make access provision more significantly more difficult, which requires mitigation under CEQA; such impacts and mitigations are ignored by the document.
Proposed Resolution of Impacts: HSR to assist with ROW to facilitate habitat, water recharge, and wetlands features to the existing park site. Construct or fund bridges to the area as proposed by the LARRMP and in current planning by the City of Glendale.

River Glen Opportunity Area
LARRMP Project Number: 125
Other Planning Documents as Applicable: Northeast LA Community Plan, Los Angeles River Ecosystem Restoration Recommended Plan
Description: The project will allow for long term revitalization in the heavily industrialized area of the Verdugo Wash. The overall project includes many features to achieve a river restoration and revitalization outcome, including reconstruction of the confluence area, land acquisition, and substantial reconfiguration of the river's banks and bed. The opportunity area is composed of several other projects outlined in the master plan as a cohesive connected area. Individual elements of the area would include, removal of invasive species, wetland and riparian habitat restoration, parks, paths and trails, and access to Griffith Park.

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Potential Impact of HSR Project: The project area has been isolated from the River by the existing rail/Metrolink corridor. The addition of a closed HSR corridor will forever further restrict and potentially prevent access to the river and could severely limit the potential for wetlands reconstruction in the vicinity of the HSR corridor. The HSR project could stand in conflict with the adopted vision for this area.
Proposed Resolution of Impacts: The HSR project would further implementation of the opportunity area and minimize preclusion of restoration features by: including key ROW acquisitions, designing structures and project features to be compatible with a future confluence restoration, and establishing access to the River in the opportunity area.

River Glen Wetlands
LARRMP Project Number: 129
Other Planning Documents as Applicable: Northeast LA Community Plan, Los Angeles River Ecosystem Restoration Recommended Plan
Description: The project will install wetland habitat in the form of freshwater marshes to contain layers of low, non-woody native vegetation in saturated soil to serve as long and short term water storage and subsurface water storage for groundwater recharge.
Potential Impact of HSR Project: The project area has been isolated from the River by the rail/Metrolink corridor. The addition of a closed HSR corridor will potentially preclude access to the river.
Proposed Resolution of Impacts: The HSR project would further implementation of the opportunity area and minimize preclusion of restoration features by: including key ROW acquisitions, designing structures and project features to be compatible with a future wetland restoration, and establishing access to the River in the opportunity area.

River Glen River Park
LARRMP Project Number: 130
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project will develop a park along the river that will allow for a mix of activities including open space and wetlands, coinciding with project 129 described above.
Potential Impact of HSR Project: The project area has been isolated from the River by the Metrolink corridor. The addition of a closed HSR corridor will forever prevent access to the river.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area, and to not preclude establishment of the park, as envisioned in the adopted plan.

River Glen Regional Gateway
LARRMP Project Number: 132
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project will be a River Glen-themed artistic gateway to the opportunity area, and will provide an artistic access point to the River. The Gateway plaza would include amenities such as, drinking fountains, public art, native vegetation, signage, and lighting.
Potential Impact of HSR Project: The project area has been isolated from the River by the Metrolink corridor. The addition of a closed HSR corridor will forever prevent access to the river.
Proposed Resolution of Impacts: The HSR project will include ROW acquisition to facilitate this project, plan for infrastructure to allow for access to the River and the project area, and to not preclude establishment of the gateway as envisioned in the adopted plan.

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890-1875

Glendale Riverwalk Non-motorized Bridge
LARRMP Project Number: 122
Other Planning Documents as Applicable: Hollywood Community Plan and
Description: The project will allow for people walking and riding bicycles to cross the River to access the south side path and Griffith Park.
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to public access to the River and could limit the ability to implement this envisioned crossing.
Proposed Resolution of Impacts: The HSR project to ensure that a crossing of the River to people walking and riding bicycles is included in implementation plans and projects of any stage.

Doran Street Industrial Green Street
LARRMP Project Number: 126
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: Green Street facility along Doran Street between generally San Fernando Road and the Los Angeles River. “Green Streets” include constructed elements to capture and infiltrate stormwater, increase urban tree canopy, and provide multi-purpose public right-of-way amenities and wayfinding and access to the Los Angeles River.
Potential Impact of HSR Project: The EIR/S contemplates various impacts that the HSR project will have on local drainage facilities throughout the corridor. The closed corridor of the HSR project directly impacts this project location and may restrict implementation of the project and similar opportunities for stormwater capture and infiltration.
Proposed Resolution of Impacts: The HSR project should mitigate impacts by including the project in its corridor implementation scope.

Brazil Street Industrial Green Street
LARRMP Project Number: 136
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: Green Street facility along Brazil Street generally between San Fernando Road and the Los Angeles River. “Green Streets” include constructed elements to capture and infiltrate stormwater, increase urban tree canopy, and provide multi-purpose public right-of-way amenities and wayfinding and access to the Los Angeles River.
Potential Impact of HSR Project: The EIR/S contemplates various impacts that the HSR project will have on local drainage facilities throughout the corridor. The closed corridor of the HSR project directly impacts this project location and may restrict implementation of the project and similar opportunities for stormwater capture and infiltration.
Proposed Resolution of Impacts: The HSR project should mitigate impacts by including the project in its corridor implementation scope.

Electronics Street Industrial Green Street
LARRMP Project Number: 140
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: Arterial Green Street facility along Electronics Place generally between San Fernando Road and the Los Angeles River. “Green Streets” include constructed elements to capture and infiltrate stormwater, increase

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urban tree canopy, and provide multi-purpose public right-of-way amenities and wayfinding and access to the Los Angeles River.
Potential Impact of HSR Project: The EIR/S contemplates various impacts that the HSR project will have on local drainage facilities throughout the corridor. The closed corridor of the HSR project directly impacts this project location and may restrict implementation of the project and similar opportunities for stormwater capture and infiltration.
Proposed Resolution of Impacts: The HSR project should mitigate impacts by including the project in its corridor implementation scope.

Goodwin Avenue Primary Local Green Street
LARRMP Project Number: 144
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: This Arterial Green Street facility is planned along Goodwin Avenue generally between San Fernando Road and the Los Angeles River. "Green Streets" include constructed elements to capture and infiltrate stormwater, increase urban tree canopy, and provide multi-purpose public right-of-way amenities and wayfinding and access to the Los Angeles River.
Potential Impact of HSR Project: The EIR/S contemplates various impacts that the HSR project will have on local drainage facilities throughout the corridor. The closed corridor of the HSR project directly impacts this project location and may restrict implementation of the project and similar opportunities for stormwater capture and infiltration.
Proposed Resolution of Impacts: The HSR project should mitigate impacts by including the project in its corridor implementation scope.

Doran Street and San Fernando Road Enhanced Intersection
LARRMP Project Number: 127
Other Planning Documents as Applicable: Los Angeles Vision Zero Action Plan
Description: The project will provide traffic calming and install safe crossing facilities and treatments at San Fernando Rd. and Doran St. to allow for safe non-motorized access to the River from Glendale and Atwater communities.
Potential Impact of HSR Project: The HSR closed corridor threatens to prevent safe non-motorized access to the River in this area and directly affects this project location.
Proposed Resolution of Impacts: The HSR project should include separated intersection crossings from east of San Fernando to the river bank. At ground-level intersections, ensure that they include traffic calming and install safe crossing treatments at San Fernando Rd. and Doran St.

Verdugo Wash Non-motorized Bridge
LARRMP Project Number: 128
Other Planning Documents as Applicable: Los Angeles Vision Zero Action Plan
Description: The project will allow for people walking and riding bicycles to cross the Verdugo Wash in the Atwater community.
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to public access to the River and could limit the ability to implement this envisioned crossing.
Proposed Resolution of Impacts: The HSR project should ensure that a crossing of the Verdugo wash to people walking and riding bicycles is included in implementation projects.

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River Glen Opportunity Area Outdoor Classroom
LARRMP Project Number: 133
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: Project will provide space for outdoor education and may include an amphitheater, open space, habitat and native species.
Potential Impact of HSR Project: The HSR closed corridor will create barriers to public access to the River.
Proposed Resolution of Impacts: HSR should assist with ROW acquisition and infrastructure to allow for development of and access to the classroom site.

River Glen Opportunity Area Riverside Street
LARRMP Project Number: 134
Other Planning Documents as Applicable: Los Angeles Vision Zero Action Plan, Northeast LA Community Plan
Description: Riverside Street located in the heavily industrialized area of the Verdugo Wash. "Riverside Streets" encourage commercial and residential buildings to face, rather than look away from, the River. The project will allow for long term revitalization.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to this area of the River, which are not adequately characterized in the EIR/S document.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for development of a "Riverside Street" at the planned location.

Brazil Street and San Fernando Road Enhanced Intersection
LARRMP Project Number: 135
Other Planning Documents as Applicable: Los Angeles Vision Zero Action Plan, Mobility Plan
Description: The project will provide traffic calming and install safe crossing treatments at Brazil Street and San Fernando Road to allow for safe non-motorized access to the River.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to this area of the River.
Proposed Resolution of Impacts: HSR should provide traffic calming and install safe crossing treatments at Brazil St and San Fernando Rd.

West End of Brazil Street Paseo
LARRMP Project Number: 137
Other Planning Documents as Applicable: Northeast LA Community Plan, Los Angeles Vision Zero Action Plan
Description: The project will provide local access via Brazil Street to the River. Paseo features may include plazas, courtyards, pocket parks, habitat, and water quality enhancements.
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to public access to the River from east of San Fernando Road.
Proposed Resolution of Impacts: The HSR project must create public access to the River as a direct mitigation, in concert with the intersection crossings described elsewhere, by establishing public ROW to the river in this location as envisioned by the adopted plan.

134 Freeway to Colorado Greenway Promenade
LARRMP Project Number: 138

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Other Planning Documents as Applicable: Northeast LA Community Plan
Description: This is a crucial connective element of the LARiverWay bike path, trail, and access system. The project will provide public access, trails, plantings, and other amenities on the river bank in the North Atwater Village area.
Potential Impact of HSR Project: The closed corridor HSR project will create new, significant barriers to public access to the River.
Proposed Resolution of Impacts: The HSR project must ensure that public access to the river is enabled by including this project in its implementation scope and CEQA mitigations. Necessary actions may include ROW acquisition to allow for access to the River.

West End of Electronics Place Paseo
LARRMP Project Number: 141
Other Planning Documents as Applicable: Northeast LA Community Plan, Los Angeles Vision Zero Action Plan
Description: The project will provide local access to the River via Electronics Place. Paseo features may include plazas, courtyards, pocket parks, habitat, and water quality enhancements.
Potential Impact of HSR Project: The closed corridor HSR project will create new, significant impacts in the form of barriers to public access to the River from east of San Fernando Road.
Proposed Resolution of Impacts: The HSR project should mitigate these impacts by creating public access to the river, in concert with the intersection crossings described elsewhere, by establishing public ROW to the river in this location as envisioned by the adopted plan. This may include acquisition from private owners.

North Atwater Greenway
LARRMP Project Number: 143
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project is a greenway located on the Atwater Village (east) side of the River from Colorado Boulevard to Los Feliz Boulevard. It is a crucial connective element of the LARiverWay trail system
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: The HSR project will ensure that public access to the river is enabled by including this project in its EIR implementation scope. Necessary actions may include ROW acquisition to allow for access to the River.

Verdant Street Non-motorized Bridge
LARRMP Project Number: 146
Other Planning Documents as Applicable:
Description: The project will allow for non-motorized use to cross the River and provide access to Griffith Park and the Atwater community.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Acquisition of property near Brazil and the river
LARRMP Project Number: 139

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Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project would allow for the preservation of open space between Electronics, Brazil and the River in a light industrial area to provide park space, passive recreation, habitat and water restoration features, and access to the River.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Taylor Yard Opportunity Area
LARRMP Project Number: 164
Other Planning Documents as Applicable: Northeast LA Community Plan, Los Angeles River Ecosystem Restoration Recommended Plan
Description: The project will allow for long term and large scale ecosystem restoration in an area bounded on the north by Fletcher Drive, on the east by Metrolink, on the south by the Pasadena Freeway, and on the west by Blake Avenue. The overall project includes one mile of terraces along the east bank, open space developments including a riverfront park between the river and the Metrolink Rail Corridor, and a linear park along the western edge of the river. Also envisioned are three regional greenway connections, two arterial green streets, and three local green streets; paseos along Benedict and Birksdale Streets and Doris Place; paseos and promenades would be located along Worthen and Eads Streets and Denby and Meadowvale Avenues. The proposed measures also include bikeways and trails, five pedestrian bridges, two regional gateways, and three neighborhood gateways.
Potential Impact of HSR Project: The project area has been isolated from the River by the Metrolink rail corridor. The addition of a closed HSR corridor will significantly impact access to the river, which is not adequately characterized in the EIR/S.
Proposed Resolution of Impacts: HSR should assist with open space implementation, ROW acquisition and infrastructure to allow for access to the River and the project area.

Taylor Yard Wetland Park
LARRMP Project Number: 165
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project will install wetland habitat in the form of freshwater marshes to contain layers of low, non-woody native vegetation in saturated soil to serve as long and short term water storage and subsurface water storage for groundwater recharge in a linear park along the western edge of the River.
Potential Impact of HSR Project: The project area has been isolated from the River by the rail/Metrolink corridor. The addition of a closed HSR corridor will forever prevent access to the river.
Proposed Resolution of Impacts: HSR to assist with open space implementation at Taylor Yard and ROW acquisition and infrastructure to allow for access to the River and the project area which is directly adjacent to the HSR track.

Taylor Yard Regional Gateway
LARRMP Project Number: 166
Other Planning Documents as Applicable: Northeast LA Community Plan

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Description: The project will be located at the Taylor Yard Wetland Park and the end of the Blimp Street Paseo. "Regional gateways"
Potential Impact of HSR Project: The project area has been isolated from the River by the Metrolink corridor. The addition of a closed HSR corridor will forever prevent access to the river.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Taylor Yard Outdoor Classroom
LARRMP Project Number: 167
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project will be located at the Taylor Yard Wetland Park and within the Regional Gateway area. An "Outdoor Classroom" is a learning school site or dedicated River facility with a River or environmental restoration focus located at a site with pedestrian or bicycle access to local schools or with specific ecological value.
Potential Impact of HSR Project: The project area has been isolated from the River by the Metrolink corridor. The addition of a closed HSR corridor will forever prevent access to the river.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Taylor Yard Promenade
LARRMP Project Number: 179
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: This project will be located along the western edge of the River roughly between SR-2 and I-5 overpasses. A "promenade" provides amenities and features, such as significant public art, parallel trails and room for riverside concessions and can enhance nearby parks in the Taylor Yard Opportunity Area. The River Promenade would include urban elements such as plazas, belvederes or overlooks, and public meeting gathering spaces.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

San Fernando Road and Elm Enhanced Intersection (at Taylor Yard)
LARRMP Project Number: 178
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project will provide traffic calming and install safe crossing treatments at San Fernando Road and Elm St. / Kerr Rd. to allow for non-motorized transport to the Cypress Park neighborhood east of the River.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with infrastructure to allow for non-motorized access to the River and the project area.

West End of Edward Way Paseo
LARRMP Project Number: 160

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Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project will provide local access via Edward Way to the River via the Edward Way and Railway Portal with community-oriented pedestrian meeting and shopping areas. Paseo features may include plazas, courtyards, pocket parks, habitat, and water quality enhancements.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Media Center Drive and Railway Portal
LARRMP Project Number: 161
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project is located at a rail underpass at Media Center Drive and will provide a gateway to the River to improve access from areas isolated by current rail infrastructure. "Portals" are freeway or rail underpasses that could provide gateways to the River to improve access from areas isolated by that infrastructure.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Edward Way and Railway Portal
LARRMP Project Number: 162
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project is located at a rail underpass at Edward Way and will provide a gateway to the River to improve access from areas isolated by current rail infrastructure. "Portals" are freeway or rail underpasses that could provide gateways to the River to improve access from areas isolated by that infrastructure.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

West End of Media Center Drive Paseo
LARRMP Project Number: 163
Other Planning Documents as Applicable: Northeast LA Community Plan
Description: The project will provide local access via Media Center Drive to the River via the Media Center Drive and Railway Portal with community-oriented pedestrian meeting and shopping areas. Paseo features may include plazas, courtyards, pocket parks, habitat, and water quality enhancements.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Broadway Arterial Green Street
LARRMP Project Number: 191

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Other Planning Documents as Applicable: Northeast LA Community Plan, Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, Mobility Plan, Vision Zero, CASP
Description: Arterial Green Street facility along North Broadway generally between San Fernando Road and the Los Angeles River. "Green Streets" include constructed elements to capture and infiltrate stormwater, create a system of arterial and local landscaped streets that aid in the restoration of habitat and serve as connections for improved access for industrial and residential users to the River.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River and impact local drainage.
Proposed Resolution of Impacts: HSR to assist with green treatments in the corridor to support access to the River and better stormwater management and the project area.

Buena Vista River Amphitheater at Midway Yard
LARRMP Project Number: 188
Other Planning Documents as Applicable: Northeast LA Community Plan, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, CASP
Description: Performance space located at the current Midway Yard site with multi-uses that offers bike amenities, trails, habitat restoration and water quality infrastructure.
Potential Impact of HSR Project: The addition of a closed HSR corridor will prevent access to the river and this amenity, potentially precluding this planned project completely.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to support and allow for access to the project area - or if that is not possible, a mitigation that accounts for the preclusion of this project, which is not currently analyzed.

Chinatown/Cornfields Opportunity Area
LARRMP Project Number: 195
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, Mobility Plan, Vision Zero, CASP
Description: The River is the central feature of a revitalized Cornfields/Chinatown area. A portion of the River's flow will be diverted through a naturalized channel creating opportunities, like the Waterwheel, for public art and habitat. In the future this area could feature recreational water activities like kayaking via a ponded area created with an inflatable rubber dam. Support of the area will be a 20 acre community park and amphitheater with a system of trails throughout the park. Passive recreational opportunities could include picnicking and birdwatching, the bulk of an island created by water diversion could create a wildlife preserve.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River and for water diversion and habitat creation.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition for the park and construction to allow for infrastructure for water diversion, and habitat amenities.

Cornfields Wetlands Park
LARRMP Project Number: 196
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, CASP
Description: Project is to create a wetlands park that compliments the Cornfields/Los Angeles State Historic park and creates more opportunity for riverfront access and wetlands habitat.

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Potential Impact of HSR Project: The HSR project will create more barriers to public access to the River and for water diversion and habitat creation.
Proposed Resolution of Impacts: HSR to assist with ROW and infrastructure construction, and incorporate track/trestle relocation into the HSR project to accommodate the park and its elements.

Chinatown/Cornfield River Park
LARRMP Project Number: 197
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, Mobility Plan, Vision Zero, CASP
Description: Park site bounded by Main and Leroy Streets on the west bank of the River. The project could include passive and active recreation space, and habitat restoration.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River and for water diversion and habitat creation.
Proposed Resolution of Impacts: HSR to assist with additional elements to provide access to the River from the site.

Chinatown/Cornfield Opportunity Area Outdoor Classroom
LARRMP Project Number: 198
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, Mobility Plan, Vision Zero, CASP
Description: Project will provide space for outdoor education and may include an amphitheater, open space, habitat and native species.
Potential Impact of HSR Project: The addition of a closed HSR corridor will prevent access to the river and this amenity from Cypress Park and Lincoln Heights.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for development of and access to the classroom site.

Chinatown/Cornfield Opportunity Area Riverside Street
LARRMP Project Number: 199
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, Mobility Plan, Vision Zero, CASP
Description: Riverside Street located on the east end of Los Angeles State Historic Park. "Riverside Streets" encourage commercial and residential buildings to face, rather than look away from, the River.
Potential Impact of HSR Project: The addition of a closed HSR corridor will prevent access to the river via a "Riverside Street".
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for development of a "Riverside Street" at the planned location.

Albion Street Outdoor Classroom
LARRMP Project Number: 203
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, Mobility Plan, Vision Zero, CASP
Description: Located on Albion Street in close proximity to the park site, the project will provide space for outdoor education and may include an amphitheater, open space, habitat and native species.

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Potential Impact of HSR Project: The addition of a closed HSR corridor on Main Street will prevent access to the river and this amenity from Lincoln Heights.
Proposed Resolution of Impacts: HSR to mitigate impact by providing additional ROW/Open Space opportunities on the immediate River corridor.

Albion Dairy River Park
LARRMP Project Number: 204
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, Mobility Plan, Vision Zero, CASP
Description: Park project on the former Albion Dairy site. Currently designed and in the bid process for future construction. The project features passive and active recreation opportunities, walking paths, water quality remediation, and dedicated habitat.
Potential Impact of HSR Project: The addition of a closed HSR corridor will impact the footprint of the park with the Main Street bridge construction.
Proposed Resolution of Impacts: HSR to mitigate impact by providing additional ROW/Open Space opportunities on the immediate River corridor.

Arroyo Seco Confluence Opportunity Area
LARRMP Project Number: 180
Other Planning Documents as Applicable: Northeast LA Community Plan, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, CASP
Description: Significant wildlife habitat area and preserve that eventually will be linked to upstream habitat at the River's confluence with the Arroyo Seco. The Arroyo Seco confluence offers an opportunity for meaningful habitat and stream restoration, for water quality treatment and flood management, and for strengthened ecological connections to the San Gabriel Mountains.
Potential Impact of HSR Project: Limiting access to the River and new amenities, which was not adequately analyzed by the EIR/S.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Riverside Drive Underpass by 110 Freeway
LARRMP Project Number: 181
Other Planning Documents as Applicable: Vision Zero, Mobility Plan, CASP
Description: Riverside Drive freeway underpass to celebrate the presence of the River and invite users down to the River Park. Convenient connections to public transportation, including the adjacent Gold Line, connect a wide range of users to this area.
Potential Impact of HSR Project: The addition of a closed HSR corridor will forever prevent access to the river.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Railroad Bridge Underpass/Overpass
LARRMP Project Number: 182
Other Planning Documents as Applicable: Vision Zero, Mobility Plan, CASP

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Description: Metrolink/HSR crossing opportunity to celebrate the presence of the River and invite users down to the River Park. Convenient connections to public transportation, including the adjacent Gold Line, connect a wide range of users to this area.
Potential Impact of HSR Project: The addition of a closed HSR corridor will forever prevent access to the river.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Elysian Park Non-motorized Bridge
LARRMP Project Number: 186
Other Planning Documents as Applicable:
Description: Located at the confluence of the Arroyo Seco and Los Angeles River, a bridge connecting Lincoln Heights to Chinatown East. Offers bikeways / Bike Paths / Pedestrian Paths, Trails, and Amenities
Potential Impact of HSR Project: The addition of a closed HSR corridor will prevent access to the river.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to support this project and allow for access to the River.

Riverside Drive (by 110 Freeway) to North Spring Street River Greenway
LARRMP Project Number: 189
Other Planning Documents as Applicable: Northeast LA Community Plan, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, CASP
Description: Land use development features from Dorris Place (west side of the River to 1st Street) that provide local access to the river and integrate with community oriented pedestrian meeting and shopping areas. The project may include plazas, courtyards, pocket parks, habitat, and trails and bikeways.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Broadway Bridge Underpass
LARRMP Project Number: 190
Other Planning Documents as Applicable: Mobility Plan, Vision Zero
Description: Broadway rail underpass that would provide a gateway to the River for non-motorized travel to improve access from areas isolated by the existing and future rail infrastructure.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Broadway River Bridge
LARRMP Project Number: 192
Other Planning Documents as Applicable: N/A
Description: Bridge that connects the communities of Lincoln Heights and Chinatown.
Potential Impact of HSR Project: The HSR closed corridor project will create more barriers to public access to the River.

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Proposed Resolution of Impacts: HSR to assist with any non-motorized redesign and construction of the bridge as a part of the HSR design.

East End of Los Angeles State Historic Park Portal
LARRMP Project Number: 193
Other Planning Documents as Applicable: Vision Zero, Mobility Plan, CASP
Description: A rail underpass that could provide a gateway to the River to improve access from areas isolated by the HSR/Metrolink corridor in Lincoln Heights and Chinatown.
Potential Impact of HSR Project: The HSR closed corridor project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW design and construction of the portal as a part of the HSR design.

Cornfields Non-motorized Bridge
LARRMP Project Number: 194
Other Planning Documents as Applicable: Vision Zero, Mobility Plan, CASP
Description: The project will allow for pedestrians and bicyclists to cross the River and provide access from the Lincoln Heights and Chinatown communities to access the State Historic Park and other river amenities.
Potential Impact of HSR Project: The closed corridor HSR project will create more barriers to public access to the River.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition for the bridge and assist with design of the bridge as a part of the HSR design.

Cornfields/Chinatown Regional Gateway
LARRMP Project Number: 200
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, Mobility Plan, Vision Zero, CASP
Description: Land use development features on the east end of Los Angeles State Historic Park that provide local access to the river and integrate with community oriented pedestrian meeting and shopping areas. The project may include plazas, courtyards, pocket parks, habitat, and trails and bikeways.
Potential Impact of HSR Project: The addition of a closed HSR corridor will prevent access to the river in Lincoln Heights.
Proposed Resolution of Impacts: HSR to mitigate impact by providing additional ROW/Open Space opportunities on the immediate River corridor.

Chinatown/Cornfield Opportunity Area Promenade
LARRMP Project Number: 206
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, CASP
Description: Land use development features from the I-5 freeway south to Alhambra Avenue that provide local access to the river and integrate with community oriented pedestrian meeting and shopping areas. The project may include plazas, courtyards, pocket parks, habitat, and trails and bikeways.
Potential Impact of HSR Project: The addition of a closed HSR corridor will prevent access to the river and this amenity from Lincoln Park.

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Proposed Resolution of Impacts: HSR to mitigate impact by providing additional ROW/Open Space opportunities on the corridor.

Los Angeles River Ecosystem Restoration Plan Reach 1: Pollywog Park Area of Griffith Park
Other Planning Documents as Applicable: Hollywood Community Plan, OneWaterLA, Sustainability Plan, and Plan for a Healthy Los Angeles
Description: Calls for approximately 82 acres of restoration which would implement a habitat corridor with riparian planting on both sides of the River. The project will allow for increased habitat and wildlife connectivity. No channel modifications within this reach.
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to access to the River and could limit the ability to implement these key habitat restoration corridors.
Proposed Resolution of Impacts: The HSR project must ensure that habitat restoration opportunities are preserved and where possible installed and enhanced. Insufficient mitigations are currently contemplated for impacts to planned projects including this one within the biological RSA.

Los Angeles River Ecosystem Restoration Plan Reach 2: Bette Davis Park Area of Griffith Park
Other Planning Documents as Applicable: Hollywood Community Plan, Northeast Los Angeles Community Plan, OneWaterLA, Sustainability Plan, and Plan for a Healthy Los Angeles
Description: Calls for approximately 39 acres of restoration which would implement a habitat corridor with linear riparian planting in Bette Davis Park area of Griffith Park between Zoo Drive and SR - 134. No channel modifications within this reach.
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to access to the River and could limit the ability to implement these key habitat restoration corridors.
Proposed Resolution of Impacts: The HSR project must ensure that habitat restoration opportunities are preserved and where possible installed and enhanced. Insufficient mitigations are currently contemplated for impacts to planned projects including this one within the biological RSA.

Los Angeles River Ecosystem Restoration Plan Reach 3: Ferraro Fields/Verdugo Wash Area of Griffith Park
Other Planning Documents as Applicable: Hollywood Community Plan, OneWaterLA, Sustainability Plan, and Plan for a Healthy Los Angeles
Description: Calls for approximately 50 acres of restoration which would continue to implement riparian habitat along Zoo Drive on the right side of the River. The project would daylight two smaller streams on the left bank. There are no channel modifications within this reach.
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to access to the River and could limit the ability to implement these key habitat restoration corridors.
Proposed Resolution of Impacts: The HSR project must ensure that habitat restoration opportunities are preserved and where possible installed and enhanced. Insufficient mitigations are currently contemplated for impacts to planned projects including this one within the biological RSA.

Los Angeles River Ecosystem Restoration Plan Reach 4: Griffith Park
Other Planning Documents as Applicable: Hollywood Community Plan, Northeast Los Angeles Community Plan, OneWaterLA, Sustainability Plan, and Plan for a Healthy Los Angeles

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Description: Calls for approximately 59 acres of restoration including construction of a side channel at the edge of Griffith Park Golf Course on the west. The Los Feliz Golf Course would be lowered, rebuilt and allowed to flood to establish riparian habitat without changes to the greens. Restoration will include daylighting approximately eight small streams.
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to access to the River and could limit the ability to implement these key habitat restoration corridors.
Proposed Resolution of Impacts: The HSR project must ensure that habitat restoration opportunities are preserved and where possible installed and enhanced. Insufficient mitigations are currently contemplated for impacts to planned projects including this one within the biological RSA.

Los Angeles River Ecosystem Restoration Plan Reach 5: Riverside Drive
Other Planning Documents as Applicable: Hollywood Community Plan, Northeast Los Angeles Community Plan, OneWaterLA, Sustainability Plan, and Plan for a Healthy Los Angeles
Description: Calls for approximately 41 acres of restoration which would continue to implement riparian habitat in a narrow strip on the east bank. The channel is soft bottom with open water and mature riparian vegetation to be developed on channel bars. There are no channel modifications within this reach.
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to access to the River and could limit the ability to implement these key habitat restoration corridors.
Proposed Resolution of Impacts: The HSR project must ensure that habitat restoration opportunities are preserved and where possible installed and enhanced. Insufficient mitigations are currently contemplated for impacts to planned projects including this one within the biological RSA.

Los Angeles River Ecosystem Restoration Plan Reach 6: Taylor Yard
Other Planning Documents as Applicable: Silverlake-Echo Park- Elysian Valley Community Plan, Northeast Los Angeles Community Plan, OneWaterLA, Sustainability Plan, and Plan for a Healthy Los Angeles
Description: Calls for approximately 159 acres of riparian corridors and widening of soft bottom river bed by approximately 300 feet and gradual riparian slope to the overbank elevation along the reach for approximately 1,000 feet in length. The project includes a backwater wetland at the upstream end of the bowtie parcel and a small terraced marsh area in the River bed transitioning into the widening of Taylor Yard. The banks would be restructured to support overhanging vines and other implanted riparian vegetation.
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to access to the River and could limit the ability to implement these key habitat restoration corridors.
Proposed Resolution of Impacts: The HSR project must ensure that habitat restoration opportunities are preserved and where possible installed and enhanced. Insufficient mitigations are currently contemplated for impacts to planned projects including this one within the biological RSA.

Los Angeles River Ecosystem Restoration Plan Reach 7: Arroyo Seco/Los Angeles River State Historic Park
Other Planning Documents as Applicable: Central City North Community Plan, Silverlake-Echo Park- Elysian Valley Community Plan, Northeast Los Angeles Community Plan, OneWaterLA, Sustainability Plan, and Plan for a Healthy Los Angeles
Description: Calls for approximately 59 acres of riparian corridors with a key feature of restoring the confluence of the Arroyo Seco. The project includes a backwater wetland and bank and bed softening of the channel by the removal of concrete for approximately a half mile upstream, stabilized by erosion control elements to maintain

890-1875

existing protection. At the downstream end on the right bank, the existing rail line would be put on a trestle at grade, while the bank would be terraced and planted under the rail line.
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to access to the River and could limit the ability to implement these key habitat restoration corridors.
Proposed Resolution of Impacts: The HSR project must ensure that habitat restoration opportunities are preserved and where possible installed and enhanced. Insufficient mitigations are currently contemplated for impacts to planned projects including this one within the biological RSA.

Los Angeles River Ecosystem Restoration Plan Reach 8: LATC
Other Planning Documents as Applicable: Boyle Heights Community Plan, OneWaterLA, Sustainability Plan, and Plan for a Healthy Los Angeles
Description: Calls for approximately 109 acres of riparian corridors to restore the original historic wash. The restored historical wash would meander through the property and could connect to the existing River channel through a wide culvert or redesigned confluence. The restoration could include riparian fringe and side channels, and includes terracing the right bank, widening of the channel removal of concrete to recreate a freshwater marsh and aquatic habitat extending 500 feet into the property,
Potential Impact of HSR Project: The closed corridor HSR project will create barriers to access to the River and could limit the ability to implement these key habitat restoration corridors.
Proposed Resolution of Impacts: The HSR project must ensure that habitat restoration opportunities are preserved and where possible installed and enhanced. Insufficient mitigations are currently contemplated for impacts to planned projects including this one within the biological RSA.

Mission Yard River Park
LARRMP Project Number: 209
Other Planning Documents as Applicable: Northeast Los Angeles Community Plan, Sustainability Plan, Los Angeles River Ecosystem Restoration Feasibility Study Recommended Plan
Description: The project will develop a park along the river that will allow for a mix of activities including open space and wetlands, coinciding with project 129 described above.
Potential Impact of HSR Project: The project area has been isolated from the River by the Metrolink corridor. The addition of a closed HSR corridor will forever prevent access to the river.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

East Side Soccer Fields Complex
LARRMP Project Number: 210
Other Planning Documents as Applicable: Boyle Heights Community Plan, Sustainability Plan, Los Angeles River Ecosystem Restoration Feasibility Study Recommended Plan
Description: The project will install soccer fields in Boyle Heights to provide active recreation opportunities to the community.
Potential Impact of HSR Project: The project area has been isolated from the River by the Metrolink corridor. The addition of a closed HSR corridor will forever prevent access to this important active recreation opportunity.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for non-motorized access between the River and the project area.

Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

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Mission Yard River Loop
LARRMP Project Number: 208
Other Planning Documents as Applicable: Boyle Heights Community Plan, Sustainability Plan, Los Angeles River Ecosystem Restoration Feasibility Study Recommended Plan
Description: Metrolink/HSR crossing opportunity to celebrate the presence of the River and invite users down to the River Park. Convenient connections to public transportation, including the adjacent Gold Line, connect a wide range of users to this area.
Potential Impact of HSR Project: The addition of a closed HSR corridor will forever prevent access to the river.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Mission Road Rail Yards Opportunity Area
LARRMP Project Number: 207
Other Planning Documents as Applicable: Boyle Heights Community Plan, Sustainability Plan, Los Angeles River Ecosystem Restoration Feasibility Study Recommended Plan
Description: Project would require the relocation of some of the existing rail facilities, remove concrete channel walls, and lower the land adjacent to the River, while building rail trestles to maintain the existing elevation of some of the rail through-tracks would provide the opportunity to create a large riverfront open space with water quality treatment areas.
Potential Impact of HSR Project: The addition of a closed HSR corridor without consideration of rail relocation and reconstruction will forever prevent access to the river for this area.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure changes to allow for access to the River and the project area.

Commercial Street Primary Local Green Street
LARRMP Project Number: 211
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles, Mobility Plan, Vision Zero
Description: Primary Local Green Street facility along Commercial Street generally between Main Street and the Los Angeles River. “Green Streets” include constructed elements to capture and infiltrate stormwater, create a system of arterial and local landscaped streets that aid in the restoration of habitat and serve as connections for improved access for industrial and residential users to the River.
Potential Impact of HSR Project: The addition of a closed HSR corridor will prevent access to the River and this amenity.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Commercial Street Pocket Park
LARRMP Project Number: 212
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles
Description: Small local space to be developed as a park to offer a variety of passive, limited active, and rest areas.

890-1875

Potential Impact of HSR Project: The addition of a closed HSR corridor via Union Station will prevent access to the river and this amenity
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

Downtown Industrial Opportunity Area Promenade
LARRMP Project Number: 213
Other Planning Documents as Applicable: Central City North, OneWaterLA, Sustainability Plan, Plan for a Healthy Los Angeles
Description: Land use development features that provide local access to the river and integrate with community oriented pedestrian meeting and shopping areas. The project may include plazas, courtyards, pocket parks, habitat, and trails and bikeways.
Potential Impact of HSR Project: The addition of a closed HSR corridor via Union Station will prevent access to the river and this amenity.
Proposed Resolution of Impacts: HSR to assist with ROW acquisition and infrastructure to allow for access to the River and the project area.

ARBOR Reach 8: LATC
Other Planning Documents as Applicable: Boyle Heights Community Plan, One Water, Sustainability Plan, and Plan for a Healthy Los Angeles
Description: Part of the Authorized LA River Ecosystem Restoration Plan which calls for approximately 109 acres of riparian corridors to restore the original historic wash. The restored historical wash would meander through the property and could connect to the existing River channel through a wide culvert or redesigned confluence. The restoration could include riparian fringe and side channels, and includes terracing the right bank, widening of the channel removal of concrete to recreate a freshwater marsh and aquatic habitat extending 500 feet into the property.
Potential Impact of HSR Project: The closed HSR alignment is on the west bank of the Los Angeles River and the LATC is on the east bank. Both limit access to the LA River, but the HSR closed corridor on the west will make public river access nearly impossible. East bank access provides greater opportunities to the public than west bank access.
Proposed Resolution of Impacts: HSR to assist with establishing rights of way, potentially in partnership with the owner of the LATC property, to improve access to the Los Angeles River on its east bank in the vicinity of the LATC.

Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

HSR BURBANK TO LOS ANGELES DRAFT EIR/EIS

CITY OF LOS ANGELES COMMENT LETTER

ATTACHMENT C

Correspondence from Councilmember Gilbert A. Cedillo, First District, to Brian P. Kelly, dated September 25, 2018, Re. City of Los Angeles Main Street Bridge Rail Safety Improvements

890-1876

GILBERT A. CEDILLO
COUNCILMEMBER
FIRST DISTRICT

September 25, 2018

Mr. Brian P. Kelly
Chief Executive Officer
California High Speed Rail Authority
355 South Grand Avenue
Los Angeles, CA 90071
Attention: Ms. Michele Boehm, Southern California Regional Director

Re: City of Los Angeles Main Street Bridge Rail Safety Improvements

Dear Mr. Kelly:

My office has reviewed the draft concept plans for a full grade separation at the Main Street bridge over the Los Angeles River in the Chinatown / Lincoln Heights area of Downtown Los Angeles in the First Council District. I understand that this alternative was developed five years ago as a method of providing additional vehicular/pedestrian safety at this rail crossing location. While my office completely supports the development of appropriate comprehensive safety improvements along the shared high-speed rail/conventional rail corridor, I believe that the concept plan for the overpass creates serious impacts to the adjacent communities. I therefore respectfully request that alternative effective safety improvements be considered at this location, including a robust gate and signaling system, in lieu of the current overpass concept being studied in the EIR/S.

I understand that grade separations are planned elsewhere within the rail segment between Los Angeles Union Station and Burbank. However, the particular conditions at this location and in this neighborhood warrant a different approach:

1. The rail distance from Main Street to Union Station is approximately one mile. Given this short distance, the 800 foot length of the train, the shared use with other passenger rail and the multiple curves approaching the station, we understand the

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Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1876

speed of the train as it crosses Main Street will be limited to no faster than 25 miles per hour, and likely less.
2. The rail line for many years has experienced a high volume with freight and regional rail trains with the intersection demonstrating a positive safety record.
3. The completion of the Spring Street bridge improvements has reduced vehicular traffic volumes on the Main Street bridge.

890-1877

I understand that preliminary concept plans contemplate a fly-over bridge structure extending over the tracks and the Los Angeles River, beginning on Main Street at Sotello Street and continuing to Clover Street, a distance of approximately one-quarter mile. I believe such an approach would result in severe impacts to this neighborhood. The elimination of adjacent property access along most of this area will result in substantial property takings, seriously impact future reuse of the Department of Water and Power Main Street property, likely reroute auto and truck traffic into the residential community along Albion Street and Avenue 17, and greatly hinder revitalization efforts between Spring and Main Streets, amongst other impacts.

890-1878

I am especially concerned about potential impacts on the City's Albion Riverside Park which is currently under construction and represents a public investment of $27 million to develop urban open space next to the Los Angeles River while protecting water quality and advancing other environmental quality objectives.

My office looks forward to working with the Authority to develop the appropriate set of public and rail safety enhancements for this unique location which may be considered in lieu of the current overpass concept being studied in the EIR/S. My office is prepared to assist your efforts to develop an effective, less impactful solution. Please advise how we can best work together toward a mutually agreeable approach and to achieve these objectives.

Please contact Gerald Gubatan of my staff at (213) 473-7001 if you have questions or need more information. Thank you for your consideration.

Sincerely,

Gil Cedillo

Gilbert Cedillo
Councilmember, First District

cc: Mayor Eric Garcetti
Councilmember Jose Huizar

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Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020)

890-1834

The commenter states that there are gaps in the transportation analysis and that an additional review by the Los Angeles Department of Transportation (LADOT) is warranted once the analysis has been revised. The Authority disagrees that there are gaps in the transportation analysis. Refer to Responses to Comments 890-1835 through 890-1853, contained in this chapter, for responses to LADOT's detailed comments on the transportation analysis. Based on the responses provided for comments 890-1835 through 890-1853, there has been no major change to the transportation analysis provided in the Draft EIR/EIS. The Authority will make the Final EIR/EIS (including responses to all comments received on the Draft EIR/EIS) available to the public at least 30 days prior to certification of the Final EIR by the Authority Board of Directors. The Final EIR/EIS will be published on the Authority's website and LADOT will receive a Notice of Availability of the Final EIR/EIS at the time of publication. As required by TR-IAMF #2 (Construction Transportation Plan), the Authority will engage in close consultation with LADOT to minimize the impact of construction and construction traffic on roadways within LADOT's jurisdiction.

890-1835

Refer to Standard Responses BLA-Response-Section 3.2 TRAN-01: Temporary Traffic Impacts, BLA-Response-Section 3.2 TRAN-02: Permanent Traffic Impacts.

The commenter expresses concern with the intersections included in the analysis and the methodology uses for operational analysis.

As a State Agency, the Authority is not subject to local regulations, including those pertaining to traffic analyses. Instead, the Authority exercised its discretion as Lead Agency to develop a set of guidelines, methodologies, and thresholds that it uses consistently throughout the state. Although the Authority is not required to follow local regulations, the Authority will coordinate with local agencies. Refer to Standard Responses BLA-Response-Section 3.2 TRAN-01: Temporary Traffic Impacts and BLA-Response Section 3.2 TRAN-02: Permanent Traffic Impacts. As described in the TTR (Authority 2020), the initial transportation study locations selected were defined based on these guidelines and utilized the most recent available ridership and trip projections available at the time. The final RSA was refined as the designs, project footprint, and ridership and vehicle trip projections were updated throughout the process. The finalized study area analyzed for this report included 202 study intersections and 37 study roadway segments. The Authority will coordinate further with local jurisdictions regarding the implementation of mitigation measures and the IAMFs.

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

890-1836

The comment requests additional details about impacts from proposed closures and reconfigurations. Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. As described in Section 2.5.2.9 of this Final EIR/EIS, the proposed closure associated with the Main Street bridge is part of a grade separation, which is an early action project and would be made in collaboration the City of Los Angeles as the local agency with jurisdiction over Main Street

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1837

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

The commenter expresses concern regarding reconfigured roadways and traffic impacts. Refer to Standard Response BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation. As described in response to comment 890-1836, contained in this chapter, Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project.

890-1838

The commenter requests that the planned LAUS Forecourt/Esplanade Project be reflected in the transportation analysis. As discussed in Section 3.19.8.2 of this Final EIR/EIS, the LAUS Forecourt and Esplanade Improvements Project was identified as a cumulative project (D25). However, final designs for the Forecourt and Esplanade Improvements Project were not available when the traffic analysis was initiated in 2015 and finalized in the *Transportation Technical Report* (Authority, 2020). The final design of the project, including reductions in travel lanes on Alameda Street, was published later and impacts of that project on Alameda Street traffic operations are analyzed in the environmental documentation for that project. That documentation was completed after the HSR project environmental analysis had been initiated.

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

890-1839

The commenter expresses concern regarding the City of Los Angeles' priorities, plans, and projects related to the revitalization of the Los Angeles River. As described in Section 3.15.3 of this Final EIR/EIS, the HSR Build Alternative may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreational experience included in the Los Angeles River Ecosystem Restoration Project Objective: Increase Recreation. However, through implementation of PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would provide alternative routes for the acquisition of existing or planned bicycle routes. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity. Therefore, the HSR Build Alternative is consistent overall with the applicable local plans, goals, and policies. As described in Response to Comment 908-1824 contained in this chapter, in Section 3.15 of this Final EIR/EIS, the proposed Bowtie Parcel has been added to Figure 3.15-2 and Table 3.15-3 and is now included in the impact discussion in Section 3.15.6.3.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1840

The commenter inquires why the intersection of Main Street/Clover Street is not included in the EIR/EIS. Section 3.2 of the Draft and Final EIR/EIS only discusses intersections where impacts exceed the level-of-service (LOS) thresholds. The Burbank to Los Angeles Project Section Transportation Technical Report (TTR) (Authority 2020) included results at all of the intersections. As intersection #1013 would be reconfigured as part of the HSR Build Alternative and control would be added (i.e., a traffic signal), it is analyzed as a special added study intersection with the ID number of 1013. This intersection was analyzed for plus-project conditions in Table 6-19 (year-2029 conditions), Table 6-24 (year-2040 conditions), and Table 6-32 (construction-period conditions) of the TTR. As demonstrated in the TTR, for the opening year (2029) the Clover Street/Avenue 17 intersection would operate at LOS D during the a.m. and p.m. peak hours. In the horizon year (2040), the Clover Street/Avenue 17 intersection would operate at LOS D during the a.m. peak hour and at LOS C during the p.m. peak hour. The intersection would not operate at poor LOS (LOS E or F) or exceed the LOS thresholds. Furthermore, Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. The revised design would provide direct access to Main Street via Lamar Street and Clover Street. The reduced reliance on the Main Street/Clover Street intersection from the revised design would improve traffic conditions. Finally, while Brunswick Street is mentioned in the Draft EIR/EIS, the Brunswick/Goodwin intersection is not. This is because the TTR acknowledges that this intersection does not exceed LOS thresholds. No revisions to this Final EIR/EIS have been made in response to this comment.

890-1841

The commenter expresses concern that detailed information is referenced back to the TTR (Authority 2020). It is common practice to provide an overview of transportation impacts (and most other resource areas) in the environmental document and provide the detailed calculations and other details in the technical reports. This minimizes the length of the CEQA/NEPA document to provide an overview and significance determinations for all impact areas. Clarifying text has been added to this Final EIR/EIS in Section 3.2.4; however, there is no succinct table to add in response to this comment.

890-1842

The commenter expresses concern regarding the study locations included in the analysis and the proposed changes that may result from the Main Street overpass. The Wilhardt Street/and Main Street and Gibbons Street/and Main Street resource study area intersections, on either side of the Main Street Los Angeles River bridge, were included in the analysis as it was known at the start of the project that there would be a re-configuration of the Main Street bridge but the full details had not been defined. A planning process for the HSR project then determined configuration options at that location and recommended improvements. Data was collected for these two intersections, in order to have existing volumes on both sides of the bridge as needed for an operations period analysis, and to review any construction- period traffic re-routing that might be necessary. Furthermore, the Burbank to Los Angeles Project Section Transportation Technical Report (TTR) (Authority 2020) included results at all of the intersections within the study area based on existing conditions. As the intersection of Wilhardt Street and Main Street is proposed to be closed, the TTR and Draft EIR/EIS only included the LOS analysis for this intersection in the Existing Conditions, 2029 Opening Year No Project, and 2040 Horizon No Project Scenarios. While the design of the Main Street Grade Separation would also remove the direction connection from Gibbons Street and Main Street, this intersection did not operate at an unsatisfactory LOS and therefore was not included in the analysis presented in Section 3.2 of the Draft EIR/EIS. This clarifying text has been added to this Final EIR/EIS in Section 3.2.4.

890-1843

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

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

890-1844

This comment is a closing statement that provides a summary of the comments provided. Refer to Responses to Comments 890-1834 through 890-1877, contained in this chapter of this Final EIR/EIS, for detailed responses to those comments. The Authority will continue to coordinate with the Los Angeles Department of Transportation as the project continues.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1845

The commenter expresses concern related to access and circulation resulting from the Main Street overpass reconfigurations. Refer to response to comments 890-1836 and 890-1837, contained in this chapter. The Authority, as the Lead Agency, has developed impact analysis guidelines and thresholds of significance that are consistent for all HSR project segments throughout the State of California. These guidelines as quoted have been consistently applied across all HSR segment RSAs in the TTR and this Final EIR/EIS. As the HSR Build Alternative is not anticipated to result in potential substantial diversion of trips to local roadways north of the Main Street corridor, the intersections listed in the comment did not meet the thresholds to trigger the need for analysis and inclusion in the RSA. No impacts are expected to occur to these local roadways. Furthermore, the revised Main Street bridge design would provide direct access to Main Street via Lamar Street and Clover Street. The reduced reliance on the Main Street/Clover Street intersection from the revised design would improve traffic conditions. Therefore, the RSA and traffic analysis has not been revised based on this comment.

890-1846

The commenter requests that the Authority work with the city for local review of roadway LOS/operations and traffic management strategies. Refer to Standard Responses BLA-Response-Section 3.2 TRAN-01: Temporary Traffic Impacts and BLA-Response Section 3.2 TRAN-02: Permanent Traffic Impacts. The project TTR (Authority 2020) analysis includes both roadway LOS and VMT metrics per HSR guidelines. Specific construction-related traffic detours were evaluated for the construction period using the LOS metrics. The VMT metric applies to the HSR system as a whole and its effect by county area, as the effects on VMT are based on diversions of regional trips and airline flights to the HSR system. Therefore, the VMT metrics are not location-specific. The City of Los Angeles and other local agencies are including LOS to a limited extent in traffic studies to review local circulation issues under the local jurisdiction powers. In addition, LOS is still required for NEPA analysis to characterize the transportation setting and consequences of the action and determine the significance of the action as a whole.

The IAMFs that are included in the project plans for impact mitigation call for a CSTMP (SS-IAMF#1) and a CTP (TR-IAMF#2) as part of each major project construction element. This will be reviewed with the local jurisdictions as developed as part of the construction plans. No revisions to this Final EIR/EIS have been made in response to this comment.

890-1847

Refer to Standard Responses BLA-Response-Section 3.2 TRAN-01: Temporary Traffic Impacts, BLA-Response-Section 3.2 TRAN-02: Permanent Traffic Impacts.

The commenter provides clarifications regarding jurisdictional ownership of roadway intersections within the RSA. Section 3.2 of this Final EIR/EIS has been revised to incorporate the clarifications noted. In addition, these clarifications will be incorporated into the project mitigation monitoring and reporting plan in order to document the correct local agency for proper coordination on mitigation measures where they apply.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1848

The commenter requests coordination with the City of Los Angeles related to the design and construction of improvements identified in TRAN-MM#1 and TRAN-MM#2. Section 3.2 of this Final EIR/EIS has been revised to state all roadway construction, modification, and improvement plans will be reviewed with the local agency within which the proposed mitigation is located.

890-1849

The commenter requests review and coordination with the City of Los Angeles for the Main Street overpass. Refer to response to comment 890-1836, contained in this chapter. The construction plans for the Main Street bridge structure would be reviewed further with the City of Los Angeles as the project moves forward. No revisions to this Final EIR/EIS have been made in response to this comment.

890-1850

The commenter expresses concern regarding the use of 2015 traffic count data for existing year baseline conditions.

In accordance with CEQA Guidelines, baseline conditions were set for the time of the publication of the Notice of Preparation (2015).The existing baseline year was defined by the California High-Speed Rail Ridership and Revenue Model that was in use at the time of the transportation analysis. Traffic counts were conducted when studies for the Burbank to Los Angeles Project Section were initiated in 2015. In addition, the TTR (Authority 2020) includes additional data and analysis on traffic effects for the assumed 2029 opening year of Phase 1 HSR service. The Draft and Final EIR/EIS include the 2040 analysis, but any differences for 2029 are footnoted in the tables. No revisions to this Final EIR/EIS have been made in response to this comment.

890-1851

The commenter recommends the queuing analysis be updated per LADOT guidance.

As a State Agency, the Authority is not subject to local regulations. Instead, the Authority exercised its discretion as Lead Agency to develop a set of guidelines, methodologies, and thresholds that it uses consistently throughout the state. The queuing and ramp analysis was based on a LOS analysis, an operations analysis, and a vehicle queuing length analysis. The results were analyzed using HSR guidelines. All ramp analysis tables included the reviewed queue lengths, and detailed operations calculations were provided as attachments to the TTR (Authority 2020). No revisions to this Final EIR/EIS have been made in response to this comment.

890-1852

The commenter suggests Table 3.2-8 in Section 3.2 of the EIR/EIS be updated to use a single range for street capacity. Table 3.2-8 in the Draft EIR/EIS and in this Final EIR/EIS provides Regionally Significant Roadway Segments with Capacities. The values provided in this table are for two different categories: hourly capacity and daily capacity. Capacities are provided as individual metrics, not a range. These capacities are the defined upper limits of values where once exceeded the capacity of the roadway is assumed to be exceeded. Therefore, based on categories of roadways as defined by the various applicable General Plans for roadway segments within the cities of Burbank, Glendale, and Los Angeles, and based on the daily of peak-hour time periods analyzed, the applied thresholds are different and have been defined in the methodology section of the Transportation Technical Report (Authority, 2020). No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1853

The commenter requests the Metro Los Angeles County CMP be removed from the Table 3.3-2 of Section 3.2 in this Final EIR/EIS as the program is no longer active. In accordance with CEQA Guidelines, the Draft EIR/EIS baseline conditions reflect those at the time when the Notice of Preparation was published (2015). However, Table 3.2-2, Regional and Local Plans and Policies, and Appendix 3.1-B, Regional and Local Policy Consistency Analysis, of this Final EIR/EIS have been revised to reflect the CMP is no longer an applicable regional plan. As stated in Section 3.2.3 of this Final EIR/EIS, as a state agency, the Authority is not required to comply with local land use and zoning regulations; however, it has endeavored to design and construct the HSR project so that it is consistent with land use and zoning regulations. Therefore, the analysis provided in Section 3.2 would remain valid and no additional analysis is required.

890-1854

The comment states that the Authority, in planning and analyzing its potential alignment through the city of Los Angeles and the Los Angeles River corridor, must be responsive to existing adopted planning documents.

The project is being undertaken by a state agency (the Authority). The project must conform to the policies and objectives of the statutes and regulations under which the Authority and the FRA operate. Because an agency of the state of California is the project proponent, the project is not subject to local government general plan policies or zoning regulations.

Nevertheless, the Authority recognizes that the project can be most successful if designed in a manner that is as sensitive as possible to the local environment through which it must travel, while still meeting the unique design constraints of HSR service. Through meetings with local agency staff and direct discussions with individual local government officials and staff, the Authority has endeavored to develop a project design that minimizes local impacts and is made as consistent with local plans as possible. Consistent with CEQA and NEPA requirements, the EIR/EIS discusses the project's consistency with local general plans and zoning regulations in Section 3.13, Station Planning, Land Use, and Development, and further in Appendix 3.1-B, Regional and Local Policy Consistency Analysis.

The Policy Consistency Analysis includes Los Angeles River Revitalization Master Plan (LARRMP) (2007), Los Angeles River Ecosystem Restoration Project/Feasibility Study Recommended Plan ("Ecosystem Project") (2016), City of Los Angeles Mobility 2035 Plan (an element of the General Plan) (2016), City of Los Angeles Sustainability Plan ("pLAn") (2015), and Cornfield Arroyo Specific Plan (CASP, 2014). The Northeast Los Angeles (NELA) Riverfront Vision Plan (2014) does not contain any goals, objectives, or policies that are directly relevant to the HSR Project.

In response to this comment, the Plan for a Healthy Los Angeles (2015) was added to Section 3.13, Station Planning, Land Use, and Development, and in Appendix 3.1-B, Regional and Local Policy Consistency Analysis.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1855

The comment states that the EIR/EIS insufficiently considers the Taylor Yard G2 River Park, the Taylor Yard G1 or Bowtie Parcel, elements of the Los Angeles River Ecosystem Restoration Plan/Project, the LARRMP, access to the Los Angeles River and its existing and planned public spaces, and wildlife movement.

The proposed Taylor Yard G2 River Park is included in the analysis and discussion of parks and recreational impacts in Section 3.15 of this Final EIR/EIS. The comment does not include specific clarifications or questions related to the analysis of this resource. Section 3.15 of this Final EIR/EIS has also been revised to incorporate the Bowtie Parcel as a recreational resource.

As described in Section 3.15.2 of this Final EIR/EIS, the LARRMP and Los Angeles River Ecosystem Restoration Project are both included in Table 3.15-1, Regional and Local Plans and Policies. Section 3.15.3 has been revised to state: “The HSR Build Alternative would not result in a loss of parkland and but may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreational experience.” Overall, the HSR Build Alternative would still be consistent with most local plans and policies concerning recreational resources. Through implementation of PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would provide alternative routes for the acquisition of existing or planned bicycle routes. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity.

A portion of the Los Angeles River is referred to as the Los Angeles River Recreation Zone (Recreation Zone). The Recreation Zone was approved by the Los Angeles City Council in February 2014 (City of Los Angeles 2020). The Recreation Zone is managed by the Mountains Recreation and Conservation Authority (MRCA) and is designated as an “open space” that supports walking, fishing, and kayaking on the Los Angeles River from Fletcher Avenue to Egret Park (Friends of the Los Angeles River 2019). A 1.7-mile segment of the Recreation Zone referred to as the Elysian Valley River Recreation Zone is located within resource study area for the HSR Project. Therefore, the resource is considered a recreational resource and has been evaluated in the Final EIR/EIS.

The HSR Build Alternative would be constructed in proximity to the Los Angeles River

890-1855

Recreation Zone (Elysian Valley Segment) (within approximately 200 feet). All of the project improvements and proposed work would be completed outside the resource boundaries. Section 3.15 of this Final EIR/EIS has been revised to include this resource in the impact analysis for parks, recreation, and open space resources.

In addition, as described in Section 3.7.4.2 of this Final EIR/EIS, wildlife movement corridors with the RSA were identified based on a review of literature, including the Los Angeles River Ecosystem Restoration Final Integrated Feasibility Report (U.S. Army Corps of Engineers 2015) and the LARRMP (City of Los Angeles 2007). Impact BIO#5 addresses temporary and permanent impacts on wildlife movement corridors within the RSA.

890-1856

The commenter states that the Taylor Yard G1 parcel is not correctly represented or analyzed in the EIR/S for the river-related projects that are planned for its location. This comment is a direct citation of comment 908-1822 from the 100-Acre Partnership. Refer to response to comment 908-1822 contained in this chapter.

890-1857

The commenter notes the need for a connection between the Rio de Los Angeles and G2 parcel sites. Refer to response to comment 908-1825 contained in this Chapter of this Final EIR/EIS.

890-1858

The commenter states that the connection of people and wildlife between the resources planned for the Taylor Yard area should be included as an early action project and that a grade-separation concept through the entire Taylor Yard area should be evaluated in collaboration with the City of Los Angeles and California State Parks. Refer to Response to Comment 908-1826 in this chapter of this Final EIR/EIS regarding the connectivity of people and wildlife in the Taylor Yard area.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1859

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

The comment states that the HSR Project perpetuates the disproportionately high and adverse human health and environmental effects to low-income and minority communities of Cypress Park and Glassell Park by increasing the size and frequency of trains into the area, further separating the community from the Los Angeles River and planned parks and natural areas, and states that the Draft EIR/EIS does not sufficiently analyze the project's significant impacts to these communities nor propose adequate mitigation.

When considering IAMFs, proposed mitigation measures, and benefits of the HSR Build Alternative, the Authority has determined that the HSR Build Alternative would not result in disproportionately high and adverse environmental effects on low-income and/or minority populations.

Chapter 5, Environmental Justice, addresses environmental justice impacts. As detailed throughout Section 5.9 of this Final EIR/EIS, and summarized in Section 5.7 of this Final EIR/EIS, all populations close to the project footprint, including minority and/or low-income populations, would experience impacts related to transportation, air quality, noise and vibration, parks and recreation, socioeconomics and communities, displacements and relocations, station planning land use and development, and aesthetics and visual impacts. However, the HSR Build Alternative would not result in disproportionately high, adverse effects on low-income and/or minority populations living within the EJ RSA. This is because the percentage of transportation, air quality, noise and vibration, parks and recreation, socioeconomics and communities, displacements and relocations, station planning land use and development, and aesthetics and visual impacts in areas with substantial low-income and/or minority populations is lower than the respective percentages of low-income and/or minority populations in the reference community. Therefore, disproportionately high and adverse impacts to low-income and/or minority populations would not occur.

890-1860

The commenter expresses concern related to the permanent impacts identified at Rio de Los Angeles State Park and Albion Riverside Park. The commenter requests the HSR project to adopt approaches for the Taylor Yard Area that enhance rather than detract from the overall provision of park space and open space. As described in Section 3.15 of this Final EIR/EIS, Impact PK#3 addresses the acquisition of park and recreation property for construction. The California Environmental Quality Act (CEQA) Conclusion for Impact PK #3 has been revised to accurately state: "The impact under CEQA would be less than significant for Rio de Los Angeles State Park, proposed Taylor Yard G2 River Park, and Albion Riverside Park because the permanent easements and acquisitions required for construction of the HSR Build Alternative would maintain the capacity, function, and values of these parks and would not prevent the use of recreational activities." Table 3.15-6 of this Final EIR/EIS has been revised to replace the words "acquisition" and "incorporation" with "improvements" to accurately reflect the impact stated in Impact PK #3, which now states: "Construction of the HSR Build Alternative would require permanent improvements to 0.56 acre of land along the southern boundary of the park. The existing access road would be lowered adjacent to the park, which would require grading of the existing vegetated slope within the park boundary." As no permanent acquisition of park property is anticipated for the High-Speed Rail (HSR) Build Alternative, the HSR Build Alternative would not result in a loss of parkland and would not require replacement of parkland per the requirements of the Public Park Preservation Act. Furthermore, as discussed in Section 3.15.6.3 of this Final EIR/EIS, the permanent easement at Albion Riverside Park would be required for the proposed Main Street grade separation which will eliminate the existing at-grade rail crossing at Main Street. The Main Street grade separation will improve safety and accessibility for people who live and work in this area. This permanent easement is in a portion of the park that is currently used as a cell tower easement and is identified in the master plan for Albion Riverside Park to continue operating as a cell tower easement area. Therefore, the permanent easement for the proposed pier walls would not remove any existing recreational facilities or amenities and would not adversely affect the activities, features, or attributes of this property.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1861

The commenter states that the Los Angeles River Bike Path should be considered a transportation facility, and that connections between the HSR project and the path should be considered. Following public circulation of the Draft EIR/EIS, the Authority determined that the primary function of the Los Angeles River Bike Path, including the proposed LA River Path Project, is for transportation and analyzes both construction and operational impacts of the HSR Build Alternative on this resource in Section 3.15. Although the HSR Build Alternative does not include additional bicyclist/pedestrian improvements connecting HSR with the LA River Bike Path, the HSR Build Alternative would provide permanent beneficial effects through improved regional accessibility, reduced vehicle trips on freeways, roadway crossings featuring improvements to active transportation infrastructure, and safety improvements for both pedestrians and bicyclists along the existing rail corridor.

This resource was not included in Section 1.4, which focuses primarily on transit, roadway, and airport projects, which function primarily as transportation. Section 3.2 analyzes potential impacts related to design feature hazards, incompatible uses, and conflicts with bicycle plans during construction. As described under Impact TR#5 of this Final EIR/EIS, permanent easements may be required from the planned extension of the Los Angeles River Bike Path for operation of the HSR Build Alternative and would impact access and connectivity to this resource if it exists at the time of HSR construction. If the planned extension does not exist at the time of construction, the Authority will be required to consult with the official with jurisdiction to identify an alternative route for the implementation of the planned extension, including maintaining connectivity, as required by Mitigation Measure PR-MM#4. Rerouting of the Los Angeles River Bike Path would maintain connectivity of the planned bicycle network and would therefore not conflict with an adopted bicycle plan. No changes have been made to this Final EIR/EIS in response to this comment.

890-1862

The commenter asks if the existing oil pipeline that runs along the Taylor Yard area on the river side of the track would be permanently relocated to San Fernando Boulevard and suggests that this relocation be considered for an Early Action Project. The Authority acknowledges the suggestion that this oil pipeline be considered an Early Action Project and will take this into consideration as the project advances to the next phase of development but cannot do so until the project is funded. The final location of the oil pipelines will be specified during the final design phase of the project. However, In general, utilities are usually not placed under railroad tracks (due to loading and maintenance access) and since there is no available space within the existing railroad right-of-way, the concept at this level of project design is to relocate this pipeline along San Fernando Road. The intent is to locate it within the public right-of-way to the extent feasible. The Authority cannot commit to a final alignment/design until input is received from the utility owners during final design and detailed guidance, in addition to other local criteria, are taken into consideration.

Impacts to public utilities and infrastructure are addressed under Impact PU&E #3 in Section 3.6.6.3 of the Draft EIR/EIS and this Final EIR/EIS. As stated in the EIR/EIS, the Authority would work with utility owners during final engineering design and construction of the HSR Build Alternative to relocate utilities or protect them in place. It is anticipated that all utilities can be relocated and modified within the construction footprint. No revisions to the Final EIR/EIS have been made in response to this comment.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1863

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

The comment states that a proposed switching station south of Verdant Street and west of the railroad right-of-way and a proposed paralleling station south of Main Street between the railroad right-of-way and the Los Angeles River would conflict with previously planned-for features to be implemented on the Los Angeles River's western bank as part of the Los Angeles River Revitalization Master Plan (LARRMP, City of Los Angeles, 2007) and Los Angeles River Ecosystem Restoration Project (USACE, 2016). Refer to BLA-Response-Chapter 2 Alt-01: Alternatives. During the alternatives analysis process, potential build alternatives that would conflict with the goals of the LARRMP were re-configured in order to maintain consistency with the goals of the plan, thereby avoiding potentially significant impacts. Additionally, the alternatives analysis determined that a build alternative within the existing rail corridor would be preferable, as it would benefit from the opportunity to share in planned improvements along the Los Angeles River. In addition, as stated in the comment, the HSR Build Alternative would occur largely within the existing rail corridor. The placement of the project footprint within the existing rail corridor would likely avoid conflicts with planned resources; however a conservative analysis of the HSR Build Alternative's consistency with the LARRMP is provided in Section 3.15.3 and concludes the HSR Build Alternative may preclude the implementation of planned resources as the final design of these resources has not been determined. As described in Section 3.15.3, while the HSR Build Alternative would be inconsistent with the LARRMP due to the potential for the HSR Build Alternative to preclude implementation of future planned resources, PR-MM#4 would require the Authority to provide alternative routes for the taking of existing or planned bicycle routes. As such, additional mitigation to minimize impacts to planned improvements to the Los Angeles River's western bank are not required. No revisions to the Final EIR/EIS have been made in response to this comment.

890-1864

The commenter summarizes the impact analysis included in Section 3.7.6.3 under Impact BIO #11, Operation Effects on Wildlife Movement, of the Draft EIR/EIS and recommends a new mitigation measure that would lower the HSR tracks in specific areas for avoidance of bird strikes (with specific reference to least Bell's vireo near Rio de Los Angeles State Park and the Taylor Yard property). The comment does not dispute any impact conclusions made in the Draft EIR/EIS or dispute the effectiveness of impact avoidance and minimization and mitigation measures included in the Draft EIR/EIS that cover impacts on sensitive wildlife species, including BIO-IAMF#11, which requires that the project be designed to be bird-safe in accordance with applicable standards. While the mitigation suggestion is acknowledged, the lowering of the track profile in this area would likely result in additional direct impacts related to the removal of vegetation and potential bird habitat, along with additional construction-related noise and other environmental impacts associated with the additional ground disturbance. Section 3.7.6.3 has been updated to include new information regarding the status of least Bell's vireo in the HSR Project area, and corresponding measures have been added based on consultations with the United States Fish and Wildlife Service (as part of the project's Endangered Species Act Section 7 consultation). Because measures included in the Final EIR/EIS are sufficient to protect the sensitive biological resources referenced in the comment, no further revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1865

The commenter summarizes the impact analysis included in Section 3.7.6.3 under Impact BIO #8, Operation Effects on Special-Status Wildlife, of the Draft EIR/EIS and recommends a new mitigation measure that would lower the HSR tracks in specific areas to reduce noise impacts on the wildlife and the potential for bird collisions. The commenter disputes the statement that there is limited special-status wildlife species and habitat along the proposed HSR alignment, and references planned expansions of habitat in areas along the Los Angeles River, including habitat for species such as the least Bell's vireo. The comment does not specifically dispute any CEQA impact conclusions made in the Draft EIR/EIS, or specifically dispute the effectiveness of impact avoidance and minimization and mitigation measures included in the Draft EIR/EIS that cover impacts on sensitive wildlife species. It should be noted that the HSR Project is proposed to be located within an existing heavily-trafficked freight and passenger rail corridor, thereby minimizing impacts to undeveloped areas and habitats—along with private properties—located throughout the region. The Authority refers the commenter to Section 3.7.6.3 of this Final EIR/EIS, which has been updated with specific wildlife-related noise impact information relevant to the areas cited in the comment. Also included is new information regarding the status of least Bell's vireo in the HSR Project area, and corresponding measures have been added based on consultations with the United States Fish and Wildlife Service (as part of the project's Endangered Species Act Section 7 consultation). Further, the HSR Project would not conflict with or preclude habitat restoration activities planned along the Los Angeles River, as there will be no permanent project-related development within the areas identified for future habitat restoration. Finally, lowering the track profile in the area may result in additional impacts related to the removal of vegetation and/or bird habitat associated with additional ground disturbance. Because the recommended measure would not increase or replace the effectiveness of mitigation already included, no revisions to this Final EIR/EIS have been made in response to this comment.

890-1866

The commenter states that analysis fails to include analysis and evaluation of the State Parks-owned Bowtie Parcel adjacent to Taylor Yard G2 parcel. Refer to response to comment 908-1824, contained in Chapter 22.

890-1867

The commenter requests that the document address impacts to the use of North Atwater Park and Chevy Chase Park by closure of Chevy Chase Drive. The comment also requests an additional mitigation measure to minimize this impact by funding the design and permitting for undercrossings of the East Bank Riverway, allowing for alternative access to these resources.

As described in Section 2.5.2.9 of this Final EIR/EIS, the permanent closure at Chevy Chase Drive would be part of the Goodwin Avenue/Chevy Chase Drive Grade Separation, which is an early action project and currently includes the provision of a new pedestrian bridge. All early action projects would be planned in collaboration with local and regional agencies. Local and regional agencies may take the lead on coordinating the construction of these early action projects. Therefore, they are described in further detail below and are analyzed within the Burbank to Los Angeles Project Section EIR/EIS to allow the agencies, as Responsible Agencies under CEQA, to adopt the findings and mitigation measures as needed to construct these projects. When the final construction design of the Goodwin Avenue/Chevy Chase Drive grade separation is initiated after certification of the environmental documentation by the Authority, more detailed designs will be produced and coordination will be made with local agencies. No revisions to the Final EIR/EIS have been made in response to this comment.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1868

The commenter requests the Final EIR/EIS include an analysis of the LARRMP and Ecosystem Plan proposed project that would be on the Los Angeles River south of Main Street, stating this would be in conflict with the proposed Main Street Bridge grade separation. As described in Section 2.5.2.9 of this Final EIR/EIS, the Main Street Bridge grade separation is an early action project and would be planned in collaboration with local and regional agencies. Local and regional agencies may take the lead on coordinating the construction of these early action projects. Therefore, they are described in further detail below and are analyzed within the Burbank to Los Angeles Project Section EIR/EIS to allow the agencies, as Responsible Agencies under CEQA, to adopt the findings and mitigation measures as needed to construct these projects. When the final construction design of the Main Street Bridge is initiated after certification of the environmental documentation by the Authority, more detailed designs will be produced and coordination will be made with local agencies to coordinate on facilities, including the Los Angeles River Path being implemented by Metro. While the Authority will coordinate with local and regional agencies for the implementation of this Early Action Project, Section 3.15.3 of this Final EIR/EIS includes an analysis of the HSR Build Alternative's consistency with applicable plans and policies. As stated in Section 3.15.3, the HSR Build Alternative is inconsistent with the Los Angeles River Ecosystem Restoration Project Objective related to planned linkages for recreational resources. However, implementation of PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would provide alternative routes for the acquisition of planned bicycle routes, which would include coordination related to the planned connection of Main Street discussed in the LARRMP.

890-1869

The commenter requests that the instruction for mitigation include coordination of all mitigation actions for the Los Angeles River Bike Path with the City of Los Angeles and key stakeholders. Per PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would provide alternative routes for the acquisition of existing or planned bicycle routes. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity. With regard to the potential impacts to the Los Angeles River Bike Path, including the Planned Extension, the owners and operators identified in Section 3.15.6 include the City of Los Angeles, the County of Los Angeles, and the Los Angeles County Mountains Recreation and Conservation Authority. In addition, during consultation with these agencies, additional stakeholder outreach may be conducted if agreed upon by these agencies during coordination. No revisions to the Final EIR/EIS have been made in response to this comment.

890-1870

The comment states that the lack of significance for impacts related to the Taylor Yard G2 River Park should be reconsidered in collaboration with the City of Los Angeles. As discussed in Section 3.15.6.3 of this Final EIR/EIS, the proposed improvements adjacent to the Taylor Yard G2 River Park would be to the existing access road and underpass. These proposed improvements would not alter the function of the park because the improvements would only include work on the existing access road. Therefore, the project would not adversely affect the activities, features, or attributes of the Taylor Yard G2 River Park. No revisions to the Final EIR/EIS have been made in response to this comment.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1871

The commenter states that the Section 4(f) analysis is flawed because "it ignores the LA River as a Park, Recreation, and Refuge."

For the purposes of this project only, the segments of the Los Angeles River Channel within the area of potential effects (APE) were presumed to be eligible for listing in the National Register of Historic Places and the California Register of Historical Resources. As such, the Los Angeles River Channel was analyzed under Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the U.S. Department of Transportation (DOT) Act. As discussed in Section 4.6.2.3 of the Section 4(f) Evaluation, the only location where the project would affect the Los Angeles River Channel is at the proposed Main Street grade separation, where one new bridge would be added just north of the extant Main Street bridge that would carry vehicular traffic. The new bridge would require new piers to be constructed within the river channel in an area totaling 0.03 acre. On June 25, 2020, the State Historic Preservation Officer concurred in writing with the Authority's finding of no adverse effect under Section 106 for the Los Angeles River Channel. By concurring with the Authority's finding of no adverse effect under Section 106, the SHPO also concurred with the Authority's determination that the project would incur a de minimis use under Section 4(f) for the Los Angeles River Channel.

As stated in Section 4.2.1 of the Draft EIR/EIS, there are no wildlife and/or waterfowl refuges in the Burbank to Los Angeles Project Section. The commenter states that the Los Angeles River, in the area of the Glendale Narrows, is a "significant" and publicly accessible resource that has existing and planned park, recreation, and refuge activities. The portion of the Los Angeles River near the Glendale Narrows is referred to as the Los Angeles River Recreation Zone (Recreation Zone). The Recreation Zone was approved by the Los Angeles City Council in February 2014 (City of Los Angeles 2020). The Recreation Zone is managed by the Mountains Recreation and Conservation Authority (MRCA) and is designated as an "open space" that supports walking, fishing, and kayaking on the Los Angeles River from Fletcher Avenue to Egret Park (Friends of the Los Angeles River 2019). A 1.7-mile segment of the Recreation Zone referred to as the Elysian Valley River Recreation Zone is located within the Section 4(f) resource study area for the HSR Project. Therefore, this portion of the LA River is also considered a Section 4(f) recreational resource and has been evaluated in this Final EIR/EIS.

890-1871

The HSR Build Alternative would be constructed in proximity to the Los Angeles River Recreation Zone (Elysian Valley Segment) (within approximately 200 feet). All of the project improvements and proposed work would be completed outside the resource boundaries; therefore, no permanent use or temporary occupancy would result from the project. After project implementation, HSR trains would run within 200 feet of the Elysian Valley Segment of the Recreation Zone. Indirect access, noise, or visual impacts (proximity impacts) would not substantially impair the activities, features, or attributes of the property. Therefore, no constructive use would result from the project. For the reasons stated above, the HSR Build Alternative would not result in a Section 4(f) use of the Elysian Valley Segment of the Los Angeles River Recreation Zone. Chapter 4 of this Final EIR/EIS has been revised to include this discussion.

The commenter states that the Los Angeles River is designated as part of the National Recreational Trail System and part of the Federal Rim of the Valley Special Resource Area. The National Recreation Trail Database identifies the Los Angeles River Trail (Greenway/Bike Path) as part of the National Recreational Trail System (American Trails 2018). Following public circulation of the Draft EIR/EIS, the Authority determined that the primary function of the Los Angeles River Bike Path, including the proposed LA River Path Project, is for transportation and would not qualify as a Section 4(f) resource. Refer to response to comment 695-1238 for a discussion on the inclusion of the planned Rim of the Valley Trail in this Final EIR/EIS.

The commenter states that additional analysis and minimization and mitigation measures are warranted to reduce constructive use impacts on bird habitat in the areas surrounding Rio de Los Angeles State Historic Park and the Metrolink Central Maintenance Facility. Section 4(f) parks and recreation resources in proximity to the Metrolink Central Maintenance Facility include Cypress Recreation Center and Elysian Park. The commenter also states that additional mitigation measures are required where the project will be adjacent to the existing Los Angeles State Historic Park. As discussed above, Section 3.7.6 of the Draft EIR/EIS analyzes impacts on biological and aquatic resources. The Section 4(f) Evaluation has been revised to analyze the HSR Build Alternative's impacts on bird habitat surrounding Rio de Los Angeles State Park, Los Angeles State Historic Park, Cypress Recreation Center, and Elysian Park. The revised analysis includes the IAMFs and mitigation measures that were proposed in Section 3.7 to avoid adverse effects on nesting birds, which are protected while nesting under the

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1871

Migratory Bird Treaty Act and the California Fish and Game Code. With implementation of these measures, the proximity impacts from the HSR Build Alternative would not substantially impair the activities, features, or attributes of these properties. As discussed in Chapter 4 of this Final EIR/EIS, the HSR Build Alternative would result in a de minimis impact on Rio de Los Angeles State Park and would not result in a use of Los Angeles State Historic Park, Cypress Recreation Center, and Elysian Park.

890-1872

The commenter states that the Section 4(f) analysis fails to include a discussion of the USACE's proposed habitat restoration along the Los Angeles River. Section 3.7.3 of the Draft EIR/EIS stated that the HSR Build Alternative would neither preclude nor conflict with the restoration activities proposed under the Los Angeles River Revitalization Master Plan (City of Los Angeles 2007) or the Los Angeles River Ecosystem Restoration Final Feasibility Report and Environmental Impact Statement/Environmental Impact Report (USACE, 2016). This discussion has been documented in the Section 4(f) Evaluation. In addition, a discussion of the impacts on biological resources within and/or along the Los Angeles River, Verdugo Wash, Los Angeles State Historic Park, and Taylor Yard (including the Bowtie Parcel) has been added to the Section 4(f) Evaluation in Chapter 4 of this Final EIR/EIS. Refer to response to comment 890-1871 for additional information about the HSR Build Alternative's impacts on biological resources and proposed IAMFs and mitigation measures.

The commenter states that the Section 4(f) analysis fails to analyze impacts to the Downtown Los Angeles River Path Project by the Los Angeles Metropolitan Transportation Authority (Metro). Following public circulation of the Draft EIR/EIS, the Authority determined that the primary function of the Los Angeles River Bike Path, including the proposed LA River Path Project, is for transportation and would not qualify as a Section 4(f) resource. The Authority has reviewed Metro's LA River Path Conceptual Design Report and based on a preliminary analysis of Metro's conceptual designs, no impacts have been identified. The Authority will continue to coordinate with Metro and the City to ensure the HSR Project does not preclude the planned extension of the LA River Bike Path, as both projects advance in design.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1873

The commenter states that additional analysis and minimization and mitigation measures are warranted to reduce constructive use in the areas surrounding Los Angeles State Historic Park, the Metrolink Central Maintenance Facility, and Taylor Yard. Refer to response to comment 890-1871, contained in this chapter, for a discussion of the potential constructive use impacts on Section 4(f) properties in proximity to the Metrolink Central Maintenance Facility and on Los Angeles State Historic Park. As stated in response to comment 890-1871, IAMFs and mitigation measures to reduce impacts on biological resources from Section 3.7 have been added to the Section 4(f) Evaluation.

The Proposed Taylor Yard G2 River Park was discussed in Section 4.6.1.15 of the Draft EIR/EIS. Based on Section 4.6.1.15, all of the project improvements and proposed work would be completed outside the resource boundaries; therefore, no permanent use or temporary occupancy would result from the project. After project implementation, HSR trains would run adjacent to the park. Indirect access, noise, or visual impacts (proximity impacts) would not substantially impair the activities, features, or attributes of the property. Therefore, no constructive use would result from the HSR Project.

As stated in Section 3.7.3 of this Final EIR/EIS, a large portion of Taylor Yard is subject to restoration under the planned Los Angeles River Revitalization Master Plan (City of Los Angeles 2007). The HSR Build Alternative would neither preclude nor conflict with the restoration activities proposed under the Los Angeles River Revitalization Master Plan or the Los Angeles River Ecosystem Restoration Final Feasibility Report and Environmental Impact Statement/Environmental Impact Report.

The proposed Main Street grade separation could result in impacts on aquatic resources. As discussed in Section 3.7.7 of the EIR/EIS, compensatory mitigation for impacts to aquatic resources would be implemented if required by regulatory agencies, including the USACE. With implementation of IAMFs and mitigation measures, the Main Street grade separation would not adversely affect aquatic resources in the Los Angeles River.

Following public circulation of the Draft EIR/EIS, the Authority determined that the primary function of the Los Angeles River Bike Path, including the proposed LA River Path Project, is for transportation and would not qualify as a Section 4(f) resource

890-1874

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

The comment states that the Environmental Justice chapter of the Draft EIR/EIS does not sufficiently analyze the project's significant impacts to the identified communities, nor does it propose adequate mitigation. The comment also states that the HSR Project perpetuates the disproportionately high and adverse human health and environmental effects to low-income and minority communities of Cypress Park and Glassell Park. When considering IAMFs, proposed mitigation measures, and benefits of the HSR Build Alternative, the Authority has determined that the HSR Build Alternative would not result in disproportionately high and adverse environmental effects on low-income and/or minority populations.

Chapter 5, Environmental Justice, addresses environmental justice impacts. As detailed throughout Section 5.9 of this Final EIR/EIS, and summarized in Section 5.7 of this Final EIR/EIS, all populations close to the project footprint, including minority and/or low-income populations, would experience impacts related to transportation, air quality, noise and vibration, parks and recreation, socioeconomics and communities, displacements and relocations, station planning land use and development, and aesthetics and visual impacts. However, the HSR Build Alternative would not result in disproportionately high, adverse effects on low-income and/or minority populations living within the EJ RSA. This is because the percentage of transportation, air quality, noise and vibration, parks and recreation, socioeconomics and communities, displacements and relocations, station planning land use and development, and aesthetics and visual impacts in areas with substantial low-income and/or minority populations is lower than the respective percentages of low-income and/or minority populations in the reference community. Therefore, disproportionately high and adverse impacts to low-income and/or minority populations would not occur.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1875

The commenter provides information about various potential future recreation opportunities as identified in the Los Angeles River Revitalization Master Plan (LARRMP). Section 3.15.3 of this Final EIR/EIS provides an analysis of the HSR Build Alternative's consistency with regional and local plans and policies, including the LARRMP. As described in Section 3.15.3, while the HSR Build Alternative would be inconsistent with the LARRMP due to the potential for the HSR Build Alternative to preclude implementation of future planned resources, PR-MM#4 would require the Authority to provide alternative routes for the taking of existing or planned bicycle routes. In addition, as stated in the comment, the HSR Build Alternative would occur largely within the existing rail corridor, and this existing condition would be accounted for in the design of planned resources. The commenter also requests that the Authority establish access to the Los Angeles River in the Ferraro Fields and River Glen Opportunity Areas by funding or building non-motorized bridges to access the area. The Authority will coordinate with the City of Los Angeles Department of Transportation regarding the detailed requests.

In addition, several of the requests by the commenter would require acquisitions of right-of-way which are not currently proposed due to the location of the HSR Build Alternative within the existing rail right-of-way. Refer to Standard Response, BLA-Response-Section 3.12 SOCIO-01: Relocations, ROW Process, Eminent Domain, for information on the property acquisition and relocation process.

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

890-1875

Therefore, the Authority will coordinate with local agencies on the disposition of excess parcels, but does not have the jurisdiction to implement these projects or obtain additional right-of-way beyond the needs of the HSR Build Alternative. No revisions have been made to this Final EIR/EIS in response to this comment.

890-1876

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

The commenter expresses concerns regarding impacts related to the proposed Main Street grade separation and requests consideration of an at-grade crossing with a robust gate and signaling system. As a result of comments received on the Draft EIR/EIS, the design for the Main Street grade separation has been refined. However, the Authority did not consider an at-grade crossing with a robust gate and signaling system because a grade separation is the most effective safety enhancement at this location given the projected growth of Metrolink, Amtrak, UPRR, and the HSR trains using the corridor. Refer to BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation for a detailed discussion on how the refined design reduces impacts on the surrounding community.

Response to Submission 890 (Eddie Guerrero Jr., City of Los Angeles Department of Transportation (LADOT), September 2, 2020) - Continued

890-1877

Refer to Standard Responses BLA-Response-Chapter 5 EJ-01: Environmental Justice Communities, BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation.

The comment states that the Main Street grade separations would result in severe impacts to the neighborhood.

In response to public comments on the Draft EIR/EIS, design changes were made to the Main Street Grade Separation to reduce impacts to the community to the extent feasible. The design of the Main Street grade separation was revised to address the concerns raised by stakeholders and the public related to access to local businesses and truck traffic. The revised design would maintain the connection between Lamar Street and Main Street, similar to the existing circulation network for trucks. Therefore, no increase in truck trips or impacts related to truck access on Albion Street or the surrounding neighborhood and Albion Riverside Park would occur as a result of the roadway reconfigurations associated with this grade separation. Additionally, implementation of TR-IAMF#2, which requires the preparation of a construction transportation plan, would minimize access disruptions on to residents, businesses, customers, delivery vehicles, and buses by limiting any road closures to the hours that are least disruptive to access for the adjacent land uses and ensuring safe vehicular and pedestrian access to local businesses and residences during construction.

As discussed in Section 3.12.4.2, Impact SOCIO#13, of this Final EIR/EIS, displacements from construction of the HSR Build Alternative, as well as temporary construction-related impacts, such as increases in dust, noise, and traffic congestion; visual changes; and access disruption associated with changes in circulation patterns, detours, and road closures, would have some disruptive effects on the community. However, these impacts would be temporary and would only last for the duration of construction. Therefore, temporary construction impacts are not anticipated to result in the physical deterioration of area communities.

890-1878

The commenter expresses concern about potential impacts on the City's Albion Riverside Park. Refer to response to comment 896-1759, contained in Chapter 21.

Submission 695 (Sean Woods, County of Los Angeles Department of Parks and Recreation, July 21, 2020)

Burbank - Los Angeles - RECORD #695 DETAIL

Status :	Action Pending
Record Date :	7/21/2020
Submission Date :	7/21/2020
Interest As :	Business and/or Organization
First Name :	Jui
Last Name :	Ing Chien
Attachments :	LACDPR Response - HSR Burbank to LA.pdf (5 mb)

Stakeholder Comments/Issues :

Mr. McLoughlin,

Please find attached the comment letter from Los Angeles County Department of Parks and Recreation regarding the draft EIR/EIS for the High-Speed Rail - Burbank to Los Angeles Project Section. Let me know if you have any questions regarding our comments. Thank you.

[cid:image002.png@01D65F39.C6C08A50]

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Life Better!"
Norma E. Garcia, Director

July 31, 2020

Mr. Mark McLoughlin
Director of Environmental Services
California High-Speed Rail Authority
Burbank to Los Angeles Section
355 S. Grand Avenue, Suite 2050
Los Angeles, CA 90071

Dear Mr. McLoughlin,

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT (EIR/EIS) FOR THE CALIFORNIA HIGH-SPEED RAIL SYSTEM BURBANK TO LOS ANGELES SECTION

The Notice of Availability of an EIR/EIS for the Burbank to Los Angeles section of the California High-Speed Rail System has been reviewed for potential impacts on the facilities of the Los Angeles County Department of Parks and Recreation (DPR). The EIR/EIS analyzes the potential impacts of the No Project Alternative and the High-Speed Rail (HSR) Build Alternative. The HSR Build Alternative may impact the following proposed trails:

- Los Angeles River Extension Trail (County) – identified in the Los Angeles County General Plan 2035 - Regional Trail System Map.
- Rim of the Valley Trail (Multi-jurisdictional) – identified in the Rim of the Valley Trail Corridor Master Plan published by the Santa Monica Mountains Conservancy.

Comments on the EIR/EIS

695-1237

- On page 3.15-21, Table 3.15-3 - Parks and Recreational Resources in the Resource Study Area for the High-Speed Rail Build Alternative. Please include the above-mentioned proposed multi-use (equestrian, hiking and mountain bicycling) trails in the Table and the analysis.

Planning and Development Agency • 1000 S. Fremont Avenue, Unit #40, Alhambra, CA 91803 • (626) 588-5322

Submission 695 (Sean Woods, County of Los Angeles Department of Parks and Recreation, July 21, 2020) - Continued

695-1238

- Please also evaluate the above trails with respect to the requirements of Section 4(f), and clarify whether the proposed project would require acquisition or temporary construction easements in the event that the County acquires or develops these proposed trails in the future. These trail alignments either bisect or run parallel to the High-Speed Rail Build Alternative. With respect to trails, DPR's primary goal is to ensure and maintain continued multi-use trail connectivity. Solutions to possible conflicts between the final alignment of the High-Speed Rail Build Alternative and County trails include: trail under-crossings and re-routing. DPR will require recordation of trail easements and construction of trails in specific areas where the final alignment of the High-Speed Rail intersects existing or proposed Board of Supervisor Adopted County trails, and multi-jurisdictional trails, such as the Rim of the Valley Trail.

695-1239

- If temporary trail closures are required during construction, the project proponent must coordinate with DPR to identify multi-use trail detours if possible. In consultation with DPR, the project proponent will need to provide advance public notification and temporary trail signage for any multi-use trail closures or detours. At the conclusion of construction, County multi-use trails shall be restored to conditions consistent with County of Los Angeles Trails Manual, including provisions for any existing amenities such as fencing or signage. For further details regarding County multi-use trail requirements, please contact Robert Ettleman at (626) 588-5323 or rettleman@parks.lacounty.gov. Any work affecting existing County multi-use trails may require a right-of-entry permit from DPR. For inquiries on the right-of-entry permit from the Department, please contact Diane Thorne at (626) 588-5324 or dthorne@parks.lacounty.gov.

695-1240

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

Thank you for including this Department in the review of this notice. We look forward to continued collaboration with the Federal Railroad Administration and the California High-Speed Rail Authority, throughout the project planning process.

Should you have any questions, please contact Ms. Jui Ing Chien, Park Planner, at (626) 588-5317 or jchien@parks.lacounty.gov.

Sincerely,

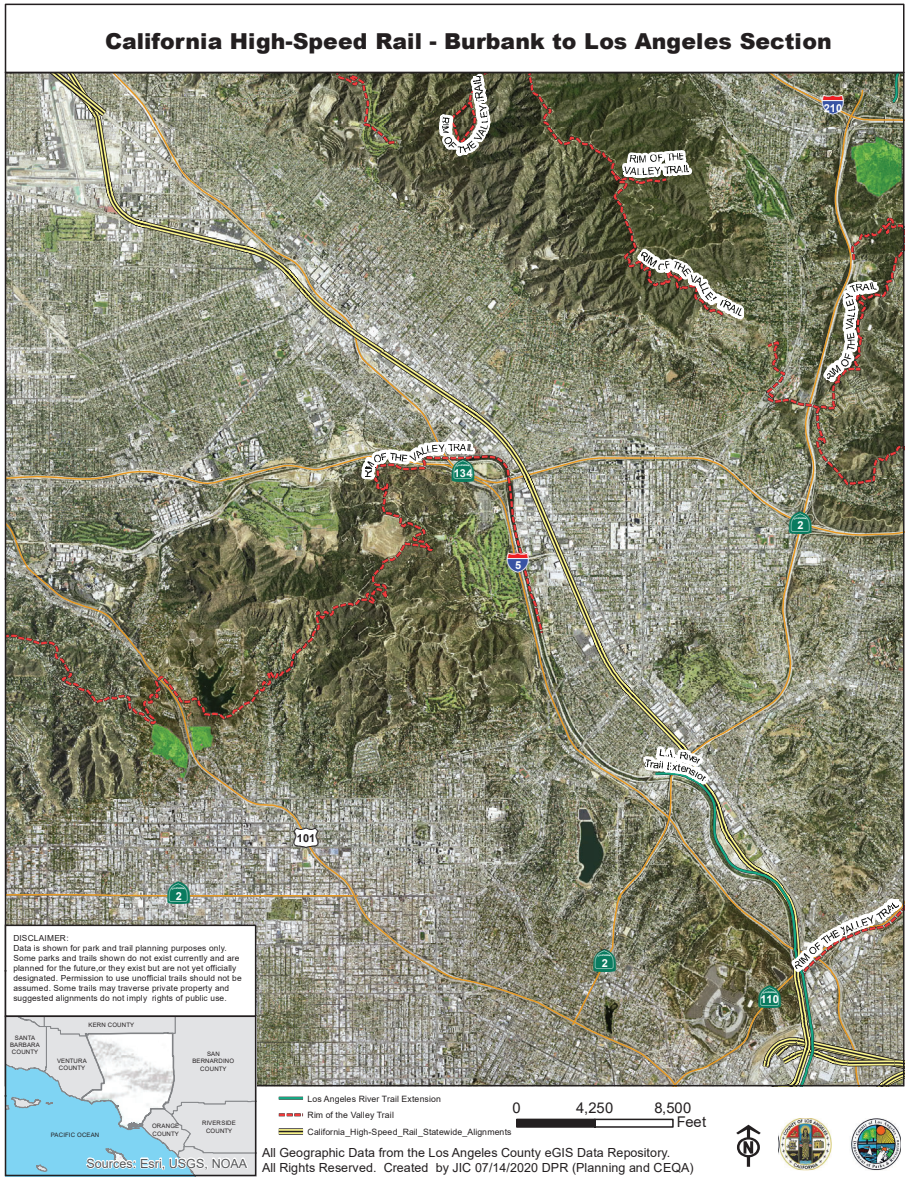
Sean Woods
Chief of Planning

SW:CL:JIC:ev

Attachment

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

Submission 695 (Sean Woods, County of Los Angeles Department of Parks and Recreation, July 21, 2020) - Continued



Response to Submission 695 (Sean Woods, County of Los Angeles Department of Parks and Recreation, July 21, 2020)

695-1237

The commenter requests that the Los Angeles River Extension Trail, as identified in the Los Angeles County General Plan 2035 (County of Los Angeles 2015), and the Rim of the Valley Trail, as identified in the Rim of the Valley Trail Corridor Master Plan (Santa Monica Mountains Conservancy 1990), be added as recreational resources. As described in Section 3.15.6 of this Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS), the Los Angeles River Bike Path, including the Planned Extension, is included in Table 3.15-3, Parks and Recreational Resources in the Resources Study Area, as Resource #31 and is included in the impact analysis. In addition, the planned Rim of the Valley Trail has been added to Figure 3.15-2 and Table 3.15-3 and is now included in the impact discussion in Section 3.15.6.3 under Impact PK#2. As the planned Rim of the Valley Trail would run above the alignment of the HSR Build Alternative project footprint near Elysian Park and would be constructed within existing railroad right-of-way, no right-of-way acquisition would be required, project improvements would be completed outside the resource boundaries, and the resource is located near an existing rail corridor. Therefore, the only potential impacts of the HSR Build Alternative on this resource are related to Air Quality, Noise, and Visual Impacts during Construction, which are discussed under Impact PK#2. Section 3.15 of this Final EIR/EIS has been revised to include this discussion.

695-1238

The commenter requests analysis of the Los Angeles River Extension Trail under Section 4(f). Following public circulation of the Draft EIR/EIS, the Authority determined that the primary function of the Los Angeles River Bike Path, including the proposed LA River Path Project, is for transportation and would not qualify as a Section 4(f) resource

The commenter requests the inclusion of the Rim of the Valley Trail in the Final EIR/EIS. The Rim of the Valley Trail Corridor Master Plan, adopted by the Santa Monica Mountains Conservancy (SMMC) in June 1990, identifies the planned Rim of the Valley Trail as a multi-use, long distance trail that would serve as a backbone for the Rim of the Valley Trail Corridor. The Rim of the Valley Trail Corridor is a planning area that is bounded by the north, east, and west edges of the San Fernando and La Crescenta Valleys. The planned Rim of the Valley Trail would be publicly owned (multi-jurisdictional) and open to the public. Therefore, this recreational resource is protected under Section 4(f) of the U.S. Department of Transportation Act. An impacts analysis for the Rim of the Valley Trail has been added to Chapter 4 of this Final EIR/EIS to assess whether the HSR Build Alternative would result in a use of this property under Section 4(f).

The impacts analysis concludes that the planned Rim of the Valley Trail would run above the alignment of the HSR Build Alternative project footprint near Elysian Park. The HSR Build Alternative would be constructed within existing railroad right-of-way, and no right-of-way acquisition would be required on the planned Rim of the Valley Trail. All of the project improvements and proposed work would be completed outside the resource boundaries; therefore, no permanent use or temporary occupancy would result from the HSR Project. In addition, if the planned Rim of the Valley Trail were operational at the time of HSR construction, the planned Rim of the Valley Trail would remain open during construction, and no access impacts would result from the HSR Project.

As detailed in Table 6-8 of the Burbank to Los Angeles Project Section Noise and Vibration Technical Report (Authority 2020), the HSR Project would result in no impact at Site LT-22, which is the closest noise monitoring location to the planned Rim of the Valley Trail. As stated in Section 3.16, Aesthetics and Visual Quality, of the Draft EIR/EIS, the project elements in this area, which is near Key Viewpoint 17, would have a neutral effect on visual quality because the project elements would be barely visible through existing vegetation or would be compatible with the character of the existing rail

Response to Submission 695 (Sean Woods, County of Los Angeles Department of Parks and Recreation, July 21, 2020) - Continued

695-1238

corridor environment. Therefore, proximity impacts would not substantially impair the activities, features, or attributes of the property.

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

695-1239

The commenter requests the California High-Speed Rail Authority (Authority) coordinate with the Los Angeles County Department of Parks and Recreation (DPR) for detours required by any temporary trail closures and requests public notification, signage, and restoration to pre-construction conditions. As described in Section 3.15.7 of this Final EIR/EIS, these conditions would all be met with the requirements of Mitigation Measure PR-MM#3. No revisions to the Final EIR/EIS have been made in response to this comment.

695-1240

The commenter cites the requirements of the Public Park Preservation Act to ensure no net loss of public parkland and facilities. As described in Section 3.15 of this Final EIR/EIS, Impact PK#3 addresses the acquisition of property for construction. The California Environmental Quality Act (CEQA) Conclusion for Impact PK #3 has been revised to accurately state: “The impact under CEQA would be less than significant for Rio de Los Angeles State Park, proposed Taylor Yard G2 River Park, and Albion Riverside Park because the permanent easements required for construction of the HSR Build Alternative would maintain the capacity, function, and values of these parks and would not prevent the use of recreational activities.” Table 3.15-6 of this Final EIR/EIS has been revised to replace the words “acquisition” and “incorporation” with “modifications” to accurately reflect the impact stated in Impact PK #3, which now states: “Construction of the HSR Build Alternative would require permanent modifications to 0.56 acre of land along the southern boundary of the park. The existing access road would be lowered adjacent to the park, which would require grading of the existing vegetated slope within the park boundary.” As no permanent acquisition of park property is anticipated for the High-Speed Rail (HSR) Build Alternative, the HSR Build Alternative would not result in a loss of parkland and would not require replacement of parkland per the requirements of the Public Park Preservation Act.

Furthermore, impacts resulting from the acquisition of land that may preclude planned bike paths would be mitigated through the implementation of PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes. PR-MM#4 would require the Authority to provide alternative routes for the acquisition of existing or planned bicycle routes. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by the Los Angeles County Metropolitan Transportation Authority (Metro), the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity.

Submission 766 (Michael R Kodama, Eco-Rapid Transit, July 30, 2020)

ECO-RAPID TRANSIT

Eco-Rapid Transit, formerly known as the Orangeline Development Authority, is a joint powers authority (JPA) created to pursue development of a transit system that moves as rapidly as possible, uses grade separation as appropriate, and is environmentally friendly and energy efficient. The system is designed to enhance and increase transportation options for riders of this region utilizing safe, advanced transit technology to expand economic growth that maximizes ridership in Southern California.
The Authority is composed of the following public agencies:

City of Artesia
City of Bell
City of Bell Gardens
City of Cudahy
766-1187 City of Downey
City of Glendale
City of Huntington Park
766-1188 City of Maywood
City of Paramount
City of South Gate
Burbank-Glendale-Pasadena Airport Authority

766-1189
Chair
Karina Macias
Mayor
City of Huntington Park
Vice-Chair
Ali Sajjad Taj
Mayor
City of Artesia
Secretary
Sean Ashton
Councilmember
City of Downey
766-1190
Treasurer
Vrej Agajanian
Council Member
City of Glendale
Internal Auditor
Jose R. Gonzalez
Mayor
City of Cudahy

Executive Director
Michael R. Kodama
General Counsel
Teresa L. Highsmith
Ex-Officio
William Rawlings
City Manager Representative

July 30, 2020

Mr. Brian P. Kelly
Chief Executive Officer
California High Speed Rail Authority
355 South Grand Avenue, Suite 2050
Los Angeles CA 90071

Re: California High Speed Rail Authority, Burbank to Los Angeles Project Section, Draft EIR/EIS Comments

Dear Mr. Kelly:

Eco-Rapid Transit respectfully is submitting its comments regarding California High Speed Rail Authority's Burbank to Los Angeles Project Section EIR/EIS. Eco-Rapid Transit is a Joint Powers Authority with 11 members (10 cities and the Burbank-Glendale-Pasadena Airport Authority) who have formed the Authority to improve transportation and connectivity to benefit our member cities. Eco-Rapid Transit is in support of high-speed rail for this project section, if CHSRA addresses significant environmental issues.

- Construction of the proposed alignment may impact Hollywood Burbank Airport operations. It is vital that CHSRA work closely with the Hollywood Burbank Airport and the FAA to prevent significant impacts to structures, taxiways or runways.

- The high-speed rail project will have significant impacts on existing businesses in the station areas. CHSRA must update and revise its plan to complement rather than displace or outright eliminate existing businesses along the route and in station areas. This includes Hollywood Burbank Airport and the station area under development. CHSRA should plan a high-speed rail transit system that enhances and supports the Airport and expands local economic opportunities in Burbank and Glendale. CHSRA can revise the EIR/EIS to reflect these goals and objectives in station areas; create community hubs and create jobs and revenues for the State.

- Although the CHSRA EIR references the Airport Ground Access Study and the Airport/Burbank Transit Oriented Development (TOD) Plan, the proposed CHSRA Airport Station is in conflict with that plan. The DEIR Hollywood Burbank Airport Station Plan is a 46-acre, 3,200 space surface parking lot. As designed, the Station ignores the principles or objectives of transit-oriented development opportunities contemplated as art of the current development in the station area. Thew DEIR station proposal appears to have been made with no real interface with the Airport or adjacent mass transit. The DEIR station design conflicts with CHSRA station planning objectives and does not enhance or create a "station community." The Station Plan displaces and eliminates existing businesses without a strategy to enhance or replace existing businesses in the Station area. The CHSRA Station Plan must build upon the Airport Ground Access Study and the Airport/Burbank TOD Plan (Link Burbank).

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ECO-RAPID TRANSIT

766-1191 Eco-Rapid Transit, formerly known as the Orangeline Development Authority, is a joint powers authority (JPA) created to pursue development of a transit system that moves as rapidly as possible, uses grade separation as appropriate, and is environmentally friendly and energy efficient. The system is designed to enhance and increase transportation options for riders of this region utilizing safe, advanced transit technology to expand economic growth that maximizes ridership in Southern California.
The Authority is composed of the following public agencies:

City of Artesia
766-1192 City of Bell
City of Bell Gardens
City of Cudahy
City of Downey
City of Glendale
766-1193 City of Huntington Park
City of Maywood
City of Paramount
City of South Gate
Burbank-Glendale-Pasadena Airport Authority

766-1194
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Mayor
City of Huntington Park
766-1195 Vice-Chair
Ali Sajjad Taj
Mayor
City of Artesia
766-1196 Secretary
Sean Ashton
Councilmember
City of Downey
Treasurer
Vrej Agajanian
Council Member
City of Glendale
Internal Auditor
766-1197 Jose R. Gonzalez
Mayor
City of Cudahy

Executive Director
Michael R. Kodama
General Counsel
Teresa L. Highsmith
Ex-Officio
William Rawlings
City Manager Representative

- CHSRA describes this project section as a connection between two key multi-modal transportation hubs, the Hollywood Burbank Airport and Los Angeles Union Station. Yet, the CHSRA DEIR/DEIS provides no plan to interface with Hollywood Burbank Airport. The DEIR/DEIS acknowledges that the Station area will be a giant surface parking lot with no planning related to how high-speed rail can complement or enhance existing transportation options, airport operations (different types of flights), and create local economic opportunities rather its focus is on replacing airline flights. If the goal is to work with and enhance local connectivity, the EIR/EIS proposes significant impacts to the Airport and local business and residential community without the desired connection or potential to create local community and economic benefits.

- The DEIR/DEIS must address connectivity to the Airport's Regional Intermodal Transit Center (RITC), the Metrolink Burbank Airport Antelope Valley Line Rail Station and the Metrolink Burbank Airport Ventura Line Rail Station which have existing connections to the Los Angeles Regional Rail and transit options. Passengers also use transit options from the Airport to access the North Hollywood Metro Rail Station.

- How is CHSRA reducing and mitigating significant local traffic issues related to the Airport station area? We believe that as proposed, the CHSRA surface parking lot Station Plan will only create additional traffic and become an origin station that will have significant local community and business impacts. The DEIR/DEIS needs to be updated to include and build upon local and regional transportation, community and economic goals and objectives.

- CHSRA has not provided enough information regarding how it plans to mitigate construction and traffic impacts during project implementation.

- CHSRA has not indicated how it will work with the City of Glendale to ensure the proposed route does not negatively impact adjacent communities and the City's concerns related to public safety, access issues and utilities.

- CHSRA has not discussed how it will consult with Metro to ensure that West Santa Ana Branch (WSAB) Line retains access Union Station. This needs to be a priority.

Eco-Rapid Transit acknowledges that the Statewide Program (Tier 1) EIR/EIS was completed in 2005 as the first phase of a tiered environmental review process for the proposed California High-Speed Rail (HSR) System planned to provide a reliable high-speed electric-powered rail system that links the major metropolitan areas of the state and that delivers predictable and consistent travel times. The system and Burbank to Los Angeles Project Section should provide an interface with commercial airports, mass transit, and the highway network, relieving capacity constraints of the existing transportation system. This EIR/EIS does not provide this critical interface and rather relies upon an outdated surface parking plan that creates significant local community impacts and contributes nothing to enhance the multi-modal transportation system. It is short sighted and misses a golden opportunity.

Page 2

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Submission 766 (Michael R Kodama, Eco-Rapid Transit, July 30, 2020) - Continued

ECO-RAPID TRANSIT

Eco-Rapid Transit, formerly known as the Orangeline Development Authority, is a joint powers authority (JPA) created to pursue development of a transit system that moves as rapidly as possible, uses grade separation as appropriate, and is environmentally friendly and energy efficient. The system is designed to enhance and increase transportation options for riders of this region utilizing safe, advanced transit technology to expand economic growth that maximizes ridership in Southern California. The Authority is composed of the following public agencies:

City of Artesia
City of Bell
City of Bell Gardens
City of Cudahy
City of Downey
City of Glendale
City of Huntington Park
City of Maywood
City of Paramount
City of South Gate
Burbank-Glendale-Pasadena Airport Authority

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City of Artesia

Secretary
Sean Ashton
Councilmember
City of Downey

Treasurer
Vrej Agajanian
Council Member
City of Glendale

Internal Auditor
Jose R. Gonzalez
Mayor
City of Cudahy

Executive Director
Michael R. Kodama

General Counsel
Teresa L. Highsmith

Ex-Officio
William Rawlings
City Manager Representative

Eco-Rapid Transit appreciates this opportunity to provide comments on the EIR/EIS. You can contact us at (562) 663-6850.

Sincerely,

Michael R. Kodama
Executive Director

Cc: Eco-Rapid Transit Board of Directors

Page 3

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Response to Submission 766 (Michael R Kodama, Eco-Rapid Transit, July 30, 2020)

766-1187

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

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

766-1188

The commenter expresses concerns about potential impacts on Hollywood Burbank Airport operations. Impacts to airport operations are addressed under Impact S&S #12 in Section 3.11.6.3 of this Final EIR/EIS. As discussed in that section, to address the potential for disruption of airfield and airspace operations at the Hollywood Burbank Airport as a result of construction of the HSR Build Alternative, the HSR Build Alternative incorporates SS-IAMF#5, which requires the Authority and/or the construction contractor(s) to submit construction plans and/or information to the FAA as required by the Code of Federal Regulations, Title 14, Part 77, which may include the location of planned HSR construction and construction staging areas within and adjacent to the boundary of the Hollywood Burbank Airport, the types and height of proposed equipment, and planned time/duration of construction, to ensure construction within and adjacent to the boundary of Hollywood Burbank Airport does not adversely affect imaginary surfaces as defined in 14 C.F.R. section 77.9(b). Additionally, SS-IAMF#5 requires the implementation of measures required by the FAA to ensure continued safety of air navigation during HSR construction pursuant to 14 C.F.R. section 77.5(c). In addition, as discussed in Section 9.4.6 of this Final EIR/EIS, the Authority has been in coordination with the Burbank-Glendale-Pasadena Airport Authority (BGPAA) and the Federal Aviation Administration (FAA) since 2014 and continues to work closely with those entities to avoid impacts to airfield operations. Additionally, the FAA is a Cooperating Agency under NEPA for the Burbank to Los Angeles Project Section. No revisions to this Final EIR/EIS have been made in response to this comment.

766-1189

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

The commenter states that the HSR project would have significant impacts on existing businesses in the station areas and states that the Authority must revise its plans to complement rather than displace existing businesses along the route and in station areas.

The Burbank Airport Station is specifically located to complement the airport and enhance multi-modal transportation options. Through the alternatives development process, the Authority identified those alternatives where environmental constraints or engineering challenges would justify dropping alternatives from further analysis, while retaining those alternatives that would be expected to avoid and/or minimize impacts on environmental and community resources. The HSR Build Alternative has minimized the footprint of the Burbank to Los Angeles Project Section to the maximum extent deemed feasible, and the Authority eliminated from further consideration an alignment that would have been in the same location, with more displacements as described below.

As described in Section 2.4.2.2, Development of Alignment Alternatives and Station Options, of this Final EIR/EIS, after the 2005 Statewide Program EIR/EIS (Authority and FRA 2005), the 2010 Palmdale to Los Angeles Preliminary Alternatives Analysis (PAA) (Authority 2010) presented various station options throughout the San Fernando Valley. The options that were withdrawn were those primarily with less multimodal connectivity and/or substantial right-of-way needs.

The 2016 Palmdale to Burbank Supplemental Alternatives Analysis (SAA) (Authority 2016) introduced three Burbank Airport Station options: Options A, B, and C. Upon further evaluation of the three Burbank Airport Station options, the 2016 Palmdale to Burbank SAA carried forward Option A and Option B due to the corresponding Palmdale to Burbank alignment alternatives carried forward.

Since the 2016 SAA, the Burbank Airport Station was further developed to refine and minimize the impacts of Station Options A and B. The engineering within the Palmdale to Burbank Project Section was advanced sufficiently to make it practical for the proposed Palmdale to Burbank alignment alternatives to connect to either the Burbank

Response to Submission 766 (Michael R Kodama, Eco-Rapid Transit, July 30, 2020) - Continued

766-1189

Airport Station Platform Configuration Option A or Option B. In 2018, the Burbank Airport Station Option Screening Report (Authority 2018) withdrew Option A primarily due to potential community and environmental justice concerns. Option A had the greatest number of residential and business displacements and noise/vibration and visual impacts, and it also had the worst intermodal connections. Option B was carried forward as part of the HSR Build Alternative and then further refined to minimize impacts. Option B Refined was designed to locate the platforms closer to the relocated Hollywood Burbank Airport terminal, reduce the station depth, improve constructability, reduce commercial and industrial property takes, and eliminate the tunnel length under residential neighborhoods to the south. In July 2021, the Authority prepared an update to the Burbank Airport Station Options Screening Report, Draft (version) 2 (updated Report). The updated Report considers the Avion Burbank Project Final EIR and approval by the City of Burbank, its current construction schedule and projected opening date, any potential changes to the evaluation results provided in the Report analysis, and determination if the Report conclusion recommending studying Option B Refined as the Preferred Alternative in the Burbank to Los Angeles California High-Speed Rail Project Section EIR/EIS remains valid. Based on the screening analysis and results described in the updated Report, the Authority maintains its 2018 recommendation to proceed with Station Option B Refined for detailed study in the EIR/EIS. When compared with Option A, Option B Refined has a substantially lower impact on environmental justice populations, has fewer residential and business displacements, and better conforms with local land use plans. Compared to Option B, Option B Refined would tunnel beneath airport properties and would be approximately 50 feet below the surface, requiring less intensive soil excavation activities and removal/treatment of spoils for station construction than Option B, which would tunnel beneath residential neighborhoods and would therefore require platforms to be 150 feet below the surface. Therefore, this EIR/EIS evaluates one underground station near the Hollywood Burbank Airport (Burbank Airport Station) and was designed to minimize impacts, including displacement impacts, to the extent possible.

Additionally, as described in Section 3.12.6.3 of this Final EIR/EIS, although construction of the HSR Build Alternative would have permanent disruptive impacts related to residential and business displacements, SOCIO-IAMF#2 would provide relocation assistance to all residents and businesses displaced by the HSR Build

766-1189

Alternative in compliance with the Uniform Act, and SOCIO-IAMF#3 would establish an appraisal, acquisition, and relocation process in consultation with affected cities, counties, and property owners. These IAMFs would minimize the potential for construction of the HSR Build Alternative to relocate businesses outside their existing communities.

The commenter also states that the Authority should plan the HSR project to enhance and support Hollywood Burbank Airport and expand local economic opportunities, create community hubs, and create jobs and revenues for the State.

As described in Section 2.8.1, High-Speed Rail, Land Use Patterns, and Development around High-Speed Rail Stations, Proposition 1A, approved by voters in 2008, called for HSR stations to “be located in areas with good access to local mass transit or other modes of transportation and further required that the HSR system be planned and built in a manner that minimizes urban sprawl and impacts on the natural environment.” The Authority embraced these policies in Proposition 1A by adopting High-Speed Train Station Area Development: General Principles and Guidelines (Authority 2011) on February 3, 2011. The purpose of the guidance was to provide “international examples where cities and transit agencies have incorporated sound urban design principles as integral elements of large-scale transportation systems.”

To meet these guidelines, the Authority has established a station-area planning program to provide cities that would have an HSR station with funding to study ways to promote economic development, encourage station-area development, and enhance multimodal connections between the station and the city. As such, the Authority is promoting local economic opportunities. Additionally, as described in Section 3.12.6.3, the HSR project would result in long-term employment from the ongoing operation and maintenance of the HSR project as well as additional indirect and induced jobs. Additionally, areas surrounding HSR stations are expected to have increases in employment opportunities due to improved accessibility. More detailed information is found in Section 3.18, Regional Growth. Therefore, the HSR project would enhance economic opportunities and create jobs.

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

Response to Submission 766 (Michael R Kodama, Eco-Rapid Transit, July 30, 2020) - Continued

766-1189

766-1190

The commenter states that although the Draft EIR/EIS references the Airport Ground Access Study and the Airport Burbank transit-oriented development (TOD) plan, the proposed Burbank Airport Station is in conflict with these plans because the Burbank Airport Station ignores the objectives of TOD opportunities and does not enhance or create a "station community."

As described in Section 2.6.3, although the HSR system will be a catalyst for development, local land-use decisions and market conditions will dictate actual construction. The Authority will work in partnership with local governments to encourage station-area development, but the Authority's power in this regard is limited. As a result, the factors that will determine actual parking demand and supply are dependent primarily on local decisions and local conditions.

In light of the uncertainty regarding the need for station-area parking, this EIR/EIS conservatively identifies parking facilities based on the maximum forecast for parking demand at each station and the local conditions affecting access planning. This approach results in providing the upper range of actual needs and the maximum potential environmental impacts of that range. To attract, support, and retain high ridership levels, the Authority is working with transportation service providers and local agencies to promote transit-oriented development around HSR stations and expand multimodal access to the HSR system. As described in Section 3.13.6, Station Planning, Land Use, and Development, LU-IAMF#1 would require the Authority to prepare a memorandum for the Burbank Airport Station and LAUS describing how the Authority's station-area development guidelines would be applied to help achieve the anticipated benefits of station-area development, including TOD. Station-area planning by local governments would coordinate efforts to advance TOD and capture the benefits of the increased access provided by a new HSR station. LU-IAMF#2 would also require the Authority to prepare a memorandum for the Burbank Airport Station and LAUS describing the local agency coordination and station-area planning conducted to prepare the station area for HSR operations. The IAMF would increase benefits and reduce potential land use impacts through coordination with local agencies to prepare the station area for HSR operations. In partnership with the Authority, local agencies would plan for and encourage multimodal hubs, as well as advance TOD strategies to support station areas that are mixed-use, are pedestrian-accessible, and have HSR-supportive

Response to Submission 766 (Michael R Kodama, Eco-Rapid Transit, July 30, 2020) - Continued

766-1190

development. As described in Section 3.13.6.3, HSR service would also provide benefits by supporting local government plans for employment and housing growth in station areas consistent with the goals of adopted TOD plans.

The commenter also states that the Station Plan displaces and eliminates existing businesses without a strategy to enhance or replace existing businesses in the station area.

As described in Section 3.12.6.3, the HSR project requires the implementation of SOCIO-IAMF#2, which would provide relocation assistance to all residents and businesses displaced by the HSR Build Alternative, and SOCIO-IAMF#3, which would establish an appraisal, acquisition, and relocation process in consultation with affected cities, counties, and property owners. The implementation of SOCIO-IAMF#2 and SOCIO-IAMF#3 would minimize the potential for construction of the HSR Build Alternative to displace and relocate local businesses outside their existing communities.

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

766-1191

The commenter states that the Burbank Airport Station area plan is not planned to complement or enhance existing airport operations and create local opportunities, but would instead be focused on replacing airplane flights. The commenter also states that the HSR project would have significant impacts to the airport, local businesses, residential communities without the desired connection or potential to create local community and economic benefits.

The City of Burbank and the Authority are working together to develop a station area plan. This joint effort will guide land use changes in the station area, and the improvements associated with HSR, to promote economic development, encourage station accessibility, and enhance regional mobility.

As described in Section 2.6.3, although the HSR system will be a catalyst for development, local land-use decisions and market conditions will dictate actual construction. The Authority will work in partnership with local governments to encourage station-area development, but the Authority's power in this regard is limited. As a result, the factors that will determine actual parking demand and supply are dependent primarily on local decisions and local conditions.

In light of the uncertainty regarding the need for station-area parking, this EIR/EIS conservatively identifies parking facilities based on the maximum forecast for parking demand at each station and the local conditions affecting access planning. This approach results in providing the upper range of actual needs and the maximum potential environmental impacts of that range. To attract, support, and retain high ridership levels, the Authority is working with transportation service providers and local agencies to promote transit-oriented development around HSR stations and expand multimodal access to the HSR system.

As described in Section 3.13.6, LU-IAMF#2 would require the Authority to prepare a memorandum for the Burbank Airport Station and LAUS describing the local agency coordination and station-area planning conducted to prepare the station area for HSR operations, and the IAMF would increase benefits and reduce potential land use impacts through coordination with local agencies to prepare the station area for HSR operations. In partnership with the Authority, local agencies would plan for and encourage

Response to Submission 766 (Michael R Kodama, Eco-Rapid Transit, July 30, 2020) - Continued

766-1191

multimodal hubs, and advance TOD strategies to support station areas that are mixed-use, are pedestrian-accessible, and have HSR-supportive development.

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

766-1192

The commenter requests that connectivity between the airport's Regional Intermodal Transit Center (RITC), the Metrolink Burbank Airport Antelope Valley Line Rail Station, and the Metrolink Burbank Airport Ventura Line Rail Station be addressed. Figure 2-29, in Chapter 2 of this Final EIR/EIS, provides the layout of the proposed HSR Burbank Station in relation to the proposed airport terminal relocation. These are directly adjacent to one another. The Metrolink Antelope Valley Line station is located directly to the north and is one to two blocks away from the proposed HSR station, providing the ability to walk between the stations and the airport. Connections to the Metrolink Ventura Line to the south will be provided by the Burbank Replacement Passenger Terminal project via a circulator system to be defined in more detail as part of the airport planning process, separate from any HSR improvements. No revisions to this Final EIR/EIS have been made in response to this comment.

766-1193

The commenter expresses concern regarding traffic impacts related to the Burbank airport station and requests additional information on local and regional transportation, community, and economic goals and objectives. The estimates of ridership at each HSR station within the Burbank to Los Angeles Project Section are provided in Section 2.6.3 of environmental document, along with anticipated mode splits among transit, park and ride, pick-up/drop-off (including Uber/Lyft services), walking, and other modes. A proportion of riders will be park and ride, and those vehicle trips, along with other vehicle modes, were evaluated as part of the trip generation and RSA impact analysis. In addition, Section 3.2.3 of this Final EIR/EIS includes a discussion of the HSR project's consistency with federal, state, regional, and local plans and laws. No revisions to this Final EIR/EIS have been made in response to this comment.

766-1194

The commenter states that the Authority has not provided enough information regarding mitigation for construction and traffic impacts during project implementation. Construction-related traffic impacts, along with associated impact avoidance and minimization features (IAMF) and mitigation measures, are explained in detail in Section 3.2.7 of this Final EIR/EIS. The commenter does not provide any specifics regarding information they find is lacking; therefore, no revisions have been made to this Final EIR/EIS in response to this comment.

766-1195

The commenter states that the Authority has not indicated how it will work with the City of Glendale to address concerns and ensure the proposed route does not negatively impact adjacent communities including impacts to public safety, access, and utilities.

As described in Section 9.3.4, Public and Agency Involvement, the Authority has coordinated with the City of Glendale throughout the EIR/EIS process. Additionally, an element of the outreach was to provide updates and presentations to clubs, organizations, and business owners, as well as to Los Angeles County and the cities of Burbank, Glendale, and Los Angeles, to facilitate an inclusive and transparent process. Table 9-3 Burbank to Los Angeles Project Section Outreach Activity in Section 9.6.4 provides a list of all stakeholder meetings related to the Burbank to Los Angeles Project Section, including meetings with the City of Glendale.

The Authority will continue to coordinate with the City of Glendale. Additionally, impacts to communities, public safety, access, and utilities are described in detail in Section 3.2, Transportation; Section 3.6, Public Utilities and Energy; Section 3.11, Safety and Security; and Section 3.12, Socioeconomics and Communities, in this Final EIR/EIS.

Response to Submission 766 (Michael R Kodama, Eco-Rapid Transit, July 30, 2020) - Continued

766-1196

The commenter indicates that the Authority has not consulted with Metro regarding the West Santa Ana Branch Line that currently is in planning stages and would connect to Los Angeles Union Station. The HSR alignment at Los Angeles Union Station would follow the existing corridor, using tracks that are being built as part of Metro's LinkUS Project. Starting from 2014, the Authority has met with Metro and Metrolink staff approximately once per month to discuss project updates and general coordination issues. The Authority would not build any infrastructure at the Los Angeles Union Station campus and thus would have no conflicts with any existing or proposed Metro lines. No revisions to this Final EIR/EIS have been made in response to this comment.

766-1197

The commenter states that the HSR project should provide an interface with commercial airports, mass transit, and the highway network, relieving capacity constraints of the existing transportation system. The comment also states that HSR's reliance on the surface parking plan will create significant local community impacts.
As described in Response to Comment 766-1191, contained in this chapter, the Authority would coordinate with local agencies to plan for and encourage multimodal hubs and advance TOD strategies.

As described in Section 2.6.3, although the HSR system will be a catalyst for development, local land-use decisions and market conditions will dictate actual construction. The Authority will work in partnership with local governments to encourage station-area development, but the Authority's power in this regard is limited. As a result, the factors that will determine actual parking demand and supply are dependent primarily on local decisions and local conditions.

In light of the uncertainty regarding the need for station-area parking, this EIR/EIS conservatively identifies parking facilities based on the maximum forecast for parking demand at each station and the local conditions affecting access planning. This approach results in providing the upper range of actual needs and the maximum potential environmental impacts of that range.

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

Submission 866 (Ashley Kramer, Greater Cypress Park Neighborhood Council, August 29, 2020)

Burbank - Los Angeles - RECORD #866 DETAIL

Status :	Action Pending
Record Date :	8/29/2020
Submission Date :	8/29/2020
Interest As :	Local Elected
First Name :	Ashley
Last Name :	Kramer

Stakeholder Comments/Issues :

There are two major issues that have come up in conversations during neighborhood council and community meetings for the stretch of High Speed Rail through Cypress Park:

866-1581 1) A sound wall is proposed, but only for the side of the track that faces the river and Elysian Valley. We have houses and condos directly next to the track in Taylor yard, not to mention Rio de Los Angeles Park and Sotomayor HIgh School. If you are including sound walls in your design, we need them on the Cypress Park residential side as well - along with graffiti deterrents.

866-1582 2) Access to G2: without a bridge or tunnel or some form of safe crossing, Cypress Park will be completely cut off from the G2 parcel which the city is planning as a park. We will also be cut off from the pedestrian and bike bridge between Elysian Valley and Cypress Park, the whole point of which is to connect the two communities. So much planning and money is going into connecting these communities and resources and high-speed rail would decimate that work for our community, which is deeply unfair to a working class community.

Thank you for your time.

Response to Submission 866 (Ashley Kramer, Greater Cypress Park Neighborhood Council, August 29, 2020)

866-1581

The noise impact analysis has been completed consistent with the FRA's High-Speed Ground Transportation Noise and Vibration Impact Assessment Manual (FRA 2012). The results of the analysis indicated that impacts to the Elysian Valley neighborhood west of the proposed alignment are classified as severe; therefore, mitigation was analyzed and is recommended. A variety of additional noise model checks have been completed to confirm that a moderate noise impact determination for the receptors at Taylor Yard is accurate. Mitigation is considered for severely impacted receptors consistent with the California High-Speed Rail Authority's (Authority) Noise Mitigation Guidelines (Appendix 3.4-A).

866-1582

The commenter expresses concern regarding access to and from the G2 Parcel and connectivity with the Elysian Valley and Cypress Park communities. As shown on Figure 3.15-3 (Sheet 3 of 4) in Section 3.15.6.3 of this Final EIR/EIS, the planned connection between the Elysian Valley community and the Proposed Taylor Yard G2 River Park is included in the proposed footprint of the planned park. The HSR Build Alternative footprint would be located within the existing rail right-of-way and not result in temporary or permanent impacts related to this planned connection. As connectivity between Rio de Los Angeles State Park and the Proposed Taylor Yard G2 River Park is identified within the Los Angeles River Revitalization Master Plan (LARRMP; City of Los Angeles 2007), impacts to future planned connections are addressed in Section 3.15.3. Section 3.15.3 of this Final EIR/EIS has been revised to state: "The HSR Build Alternative would not result in a loss of parkland but may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreational experience as identified in the LARRMP under objectives related to the Taylor Yard Opportunity Area." In addition, through implementation of PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would provide alternative routes for the acquisition of existing or planned bicycle routes. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity. Therefore, the HSR Build Alternative is consistent overall with the applicable local plans, goals, and policies, which include connectivity of these parks and recreational resources with neighboring communities.

Submission 634 (Alexandra Cuadra, Los Angeles County Fire Department, June 10, 2020)

Burbank - Los Angeles - RECORD #634 DETAIL

Status :	Action Pending
Record Date :	6/10/2020
Submission Date :	6/10/2020
Interest As :	Local Agency
First Name :	Alexandra
Last Name :	Cuadra

Stakeholder Comments/Issues :

634-653 Hello this is Alexandra Cuadra with the LA County Fire Department Fourth St Division. I was calling on behalf of this project because I received the project but I need an actual contact person that I can mail this letter to you. If you can give me.. you know what you can either give me a call at 323-890-4330 today or you can email me at alexandra.cuadra@fire.lacounty.gov with that information that would be very helpful. Thank you. Bye.

Response to Submission 634 (Alexandra Cuadra, Los Angeles County Fire Department, June 10, 2020)

634-653

The commenter requested clarification as to the contact person for the comment response letter. The commenter was contacted on June 11, 2020, and given Diane Ricard's name as the project manager for contact purposes. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 635 (Alexandra Cuadra, Los Angeles County Fire Department, June 10, 2020)

Burbank - Los Angeles - RECORD #635 DETAIL

Status :	Action Pending
Record Date :	6/10/2020
Submission Date :	6/10/2020
Interest As :	Local Agency
First Name :	Alexandra
Last Name :	Cuadra

Stakeholder Comments/Issues :

Good Morning,

635-654

I received the Notice of Availability for a Draft Environmental Impact Report but I need a contact person to add into our system. Would you be able to provide me this so it can be entered as soon as possible?

Thank you,

Alexandra Cuadra
Secretary III, Forestry Division
Los Angeles County Fire Department
5823 Rickenbacker Road, Room 123
Commerce, Ca 90040
Phone- (323)890-4330
Alexandra.Cuadra@Fire.Lacounty.gov<mailto:Alexandra.Cuadra@Fire.Lacounty.gov>

[New Fire and Forestry Logo]

Response to Submission 635 (Alexandra Cuadra, Los Angeles County Fire Department, June 10, 2020)

635-654

The commenter requested clarification as to the contact person for the comment response letter. The commenter was contacted on June 11, 2020, and given Diane Ricard's name as the project manager for contact purposes. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 768 (Ronald Durbin, Los Angeles County Fire Department, Forestry Division, July 7, 2020)

Burbank - Los Angeles - RECORD #768 DETAIL

Status :	Action Pending
Record Date :	7/30/2020
Submission Date :	7/7/2020
Interest As :	Local Agency
First Name :	Ronald
Last Name :	Durbin
Attachments :	B-LA_Comment_LACFD Comment_Ronald_Durbin.pdf (1 mb)

Stakeholder Comments/Issues :

Dear Ms. Ricard:
DRAFT ENVIRONMENTAL IMPACT REPORT, "BURBANK TO LOS ANGELES PROJECT SECTION," WOULD PROVIDE HSR SERVICE BETWEEN THE BURBANK AIRPORT STATION AND LOS ANGELES UNION STATION, IT WOULD PROVIDE LINKS WITH REGIONAL AND LOCAL MASS TRANSIT SERVICES AS WELL AS CONNECTIVITY TO AIRPORTS AND THE HIGHWAY NETWORKS IN THE SAN FERNANDO VALLEY AND LOS ANGELES BASIN, BURBANK, FFER 2020003433
The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.
The following are their comments:
PLANNING DIVISION:

768-1227 The subject Project is not within the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County) jurisdiction. Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.
For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov. LAND DEVELOPMENT UNIT:

768-1228 The County of Los Angeles Fire Department's Land Development Unit has no requirements for the proposed project.
Additional comments pending the information returned by the applicant for Fire Department's plan check; presently all outstanding comments have been addressed via plan check.
For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or Joseph.Youman@fire.lacounty.gov.
FORESTRY DIVISION - OTHER ENVIRONMENTAL CONCERNS:
The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

768-1229 Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.
If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.
The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.
For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.
HEALTH HAZARDOUS MATERIALS DIVISION:

768-1230 The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that the Cal-EPA Department of Toxic Substances Control is the lead environmental oversight agency for the project.
HHMD has no additional comments for the project at this time.
Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.
If you have any additional questions, please contact this office at (323) 890-4330.

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION PREVENTION SERVICES BUREAU
RMD:ac

Submission 768 (Ronald Durbin, Los Angeles County Fire Department, Forestry Division, July 7, 2020) - Continued

COUNTY OF LOS ANGELES
FIRE DEPARTMENT
1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2426
www.fire.lacounty.gov

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JANICE HAHN
FOURTH DISTRICT
KATHRYN BARGER
FIFTH DISTRICT

July 7, 2020

Diane Ricard, Project Manager
California High-Speed Rail Authority
Planning Department
355 South Grand Avenue
Los Angeles, CA 90071

Dear Ms. Ricard:

DRAFT ENVIRONMENTAL IMPACT REPORT, "BURBANK TO LOS ANGELES PROJECT SECTION," WOULD PROVIDE HSR SERVICE BETWEEN THE BURBANK AIRPORT STATION AND LOS ANGELES UNION STATION, IT WOULD PROVIDE LINKS WITH REGIONAL AND LOCAL MASS TRANSIT SERVICES AS WELL AS CONNECTIVITY TO AIRPORTS AND THE HIGHWAY NETWORKS IN THE SAN FERNANDO VALLEY AND LOS ANGELES BASIN, BURBANK, FFER 2020003433

768-1233

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

768-1231

The subject Project is not within the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County) jurisdiction. Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	EL MONTE	INDUSTRY	LAWNDALE	PARAMOUNT	SIGNAL HILL
ARTESIA	CARSON	GARDENA	INGLEWOOD	LOMITA	PICO RIVERA	SOUTH EL MONT
AZUSA	CERRITOS	GLENDORA	IRWINDALE	LYNWOOD	POMONA	SOUTH GATE
BALDWIN PARK	CLAREMONT	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	MALIBU	RANCHO PALOS VERDES	TEMPLE CITY
BELL	COMMERCE	HAWTHORNE	LA HABRA	MAYWOOD	ROLLING HILLS	WALNUT
BELL GARDENS	COVINA	HERMOSA BEACH	LA MIRADA	NORWALK	ROLLING HILLS ESTATES	WEST HOLLYWO
BELLFLOWER	CUDAHY	HIDDEN HILLS	LA PUENTE	PALMDALE	ROSEMEAD	WESTLAKE VILL
BRADBURY	DIAMOND BAR	HUNTINGTON PARK	LAKEWOOD	PALOS VERDES ESTATES	SAN DIMAS	WHITTIER
	DUARTE		LANCASTER		SANTA CLARITA	

768-1232

LAND DEVELOPMENT UNIT:

The County of Los Angeles Fire Department's Land Development Unit has no requirements for the proposed project.

Additional comments pending the information returned by the applicant for Fire Department's plan check; presently all outstanding comments have been addressed via plan check.

For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or Joseph.Youman@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

768-1234

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that the Cal-EPA Department of Toxic Substances Control is the lead environmental oversight agency for the project. HHMD has no additional comments for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Submission 768 (Ronald Durbin, Los Angeles County Fire Department, Forestry Division, July 7, 2020) - Continued

Diane Ricard, Project Manager
July 7, 2020
Page 3

Very truly yours,

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac

Response to Submission 768 (Ronald Durbin, Los Angeles County Fire Department, Forestry Division, July 7, 2020)

768-1227

The commenter states that the HSR Build Alternative does not appear to have any impact on the emergency responsibilities of the Los Angeles County Fire Department. This comment is noted.

768-1228

The commenter indicates the County of Los Angeles Fire Department has no requirements for the proposed HSR project and that plan check comments have been addressed. The Authority acknowledges that the Fire Department has no further comments and appreciates the Fire Department's coordination and partnership.

768-1229

The commenter summarizes provisions of the Los Angeles County Oak Tree Ordinance and states that if oak trees are known to exist in the HSR project vicinity, further field surveys should be conducted to verify presence within the HSR project vicinity. The Authority acknowledges the Los Angeles County Oak Tree Ordinance and refers the commenter to Sections 3.7.5.8 and 3.7.6.3 of this Final EIR/EIS for information regarding the HSR project's impacts on protected trees and measures included to avoid, reduce, and mitigate for such impacts. As required by mitigation measure BIO-MM#35, the project biologist will conduct surveys in the work area to identify protected trees prior to ground-disturbing activities, and the Authority will provide compensatory mitigation for impacts on protected trees in accordance with applicable local government ordinances, policies, and regulations. No revisions to this Final EIR/EIS have been made in response to this comment.

768-1230

This comment is noted; the Authority acknowledges that the Cal-EPA Department of Toxic Substances Control is the lead environmental oversight agency for the project.

768-1231

The commenter states that the Project is not within the Los Angeles Fire Department jurisdiction and therefore the project does not have any impact on the emergency responsibilities of that Department. This comment is noted.

768-1232

The commenter states that the County of Los Angeles Fire Department's Land Development Unit has no requirements for the proposed project. The commenter also states that presently all outstanding comments have been addressed via plan check. These comments are noted.

768-1233

The commenter summarizes provisions of the Los Angeles County Oak Tree Ordinance and states that if oak trees are known to exist in the HSR project vicinity, further field surveys should be conducted to verify presence within the HSR project vicinity. The Authority acknowledges the Los Angeles County Oak Tree Ordinance and refers the commenter to Sections 3.7.5.8 and 3.7.6.3 of this Final EIR/EIS for information regarding the HSR project's impacts on protected trees and measures included to avoid, reduce, and mitigate for such impacts. As required by mitigation measure BIO-MM#35, the project biologist will conduct surveys in the work area to identify protected trees prior to ground-disturbing activities, and the Authority will provide compensatory mitigation for impacts on protected trees in accordance with applicable local government ordinances, policies, and regulations. No revisions to this Final EIR/EIS have been made in response to this comment.

768-1234

The commenter states that the California Environmental Protection Agency (Cal-EPA) Department of Toxic Substances Control is the lead environmental oversight agency for the project. As stated in Section 3.10.6.3, the Authority will consult with the Cal-EPA Department of Toxic Substances Control regarding known areas of concern.

Submission 762 (Toan Duong, Los Angeles County Public Works, July 30, 2020)

Burbank - Los Angeles - RECORD #762 DETAIL

Status : Action Pending
Record Date : 7/30/2020
Submission Date : 7/30/2020
Interest As : Business and/or Organization
First Name : Toan
Last Name : Duong

Stakeholder Comments/Issues :

Draft Environmental Impact report (DEIR)
California high speed rail (HSR)
Burbank to los angeles project section
Environmental PLan (RPPL2020003598)

Thank you for the opportunity to review the DEIR for the subject project. The HSR Burbank to Los Angeles Project Section is a part of the larger, 800-mile HSR system planned throughout California from San Diego to Sacramento. This section is between the Burbank Airport Station and Los Angeles Union Station.

The Los Angeles County Flood Control District (LACFCD) and Department of Public Works (Public Works) have reviewed the project and offer these comments for your consideration:

1. General Comment - LACFCD Permit

762-1162

Project components affecting the LACFCD's facilities or right of way will require a flood permit, engineering plans approval, and hydrology study approval from the LACFCD through EPIC-LA at epicla.lacounty.gov<https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fepicla.lacounty.gov%2f&c=E,1,FtXhUFTpgUsLy71w14gTBqq2PNyBkUOT_hyFmWZ6yKhtBW8x_zG8uiZpf7sohiS1i_a2t72GisK89BP-ULFepYG_LkWrwq3osTyDQdrj5c09Zh8hKMfw3g,,&typo=1>. The LACFCD should be disclosed and included as a responsible permitting agency in the DEIR. Please submit all future submittals, documents, drawings and details of river crossings to LACFCD as soon as possible for review and comments.

762-1163

2. Decking used to cross over LACFCD's infrastructure has the potential to provide shelter for People Experiencing Homelessness (PEH) within the LACFCD right of way. Impacts from PEH encampments, which utilize the HSR's infrastructure for shelter, should be identified and mitigated for. In addition, please provide the LACFCD a point of contact to handle referrals for PEH related issues.

762-1164

3. Preliminary Engineering for Project Definition (PEPD), Volume 1, General, Track Alignment & Right-of-Way, Pgs. 87 - 88

Please include elevation data points for the invert and top of channel for the Los Angeles River in the existing plan views of the river crossings.

For questions regarding comments no. 1 to 3, please contact Prabesh Sharma of Public Works, Stormwater Planning Division at (626) 300-2379 or psharma@pw.lacounty.gov<mailto:psharma@pw.lacounty.gov>.

762-1165

4. Active Projects in the City of Burbank

The following locations contain active bridge maintenance projects that are within the vicinity and may potentially conflict with the proposed project:

All bridges over the Los Angeles River/Burbank western channel
* South of Lake Street/West of Providencia Avenue
* West of Verdugo Avenue
* West of Olive Avenue
* West of Magnolia Avenue
* West of Burbank Avenue

For questions and coordination of project schedule, please contact Hank Fung of Public Works, Transportation Planning and Programs Division at (626) 458-3936 or hfung@pw.lacounty.gov<mailto:hfung@pw.lacounty.gov>.

If you have any questions or require additional information, please contact the undersigned.

Sincerely,

Toan Duong
Civil Engineer
Los Angeles County Public Works
Office: (626) 458-4921
[cid:image001.png@01D66696.64237060]

Response to Submission 762 (Toan Duong, Los Angeles County Public Works, July 30, 2020)

762-1162

The commenter states that project components affecting Los Angeles County Flood Control District (LACFCD) facilities will require a LACFCD approval. As discussed in Table 2-21 of Chapter 2, Alternatives, of this Final EIR/EIS, environmental reviews, permits, and approvals from the LACFCD are included for improvements affecting LACFCD facilities. Table 2-21 also identifies the LACFCD as a California Environmental Quality Act (CEQA) responsible agency. Additionally, as discussed in Section 3.8.6.3 in Section 3.8, Hydrology and Water Resources, of this Final EIR/EIS, under Impact HWR #2, drainage facilities would be designed in compliance with the applicable jurisdiction requirements, including those of the LACFCD. As discussed under Impact HWR #8, a Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR) for each encroachment within a 100-year floodplain would be required. The applications for the CLOMR and LOMR would processed through the LACFCD and the Federal Emergency Management Agency (FEMA). Additionally, during the design phase, the Authority would be required to coordinate with the LACFCD and U.S. Army Corps of Engineers (USACE) to obtain Section 408 review for the Los Angeles River near the Metrolink CMF, the Los Angeles River near the Metro Gold Line and Broadway, the Los Angeles River at the Downey Bridge, the Los Angeles River at the Main Street grade separation, the Los Angeles River at the Mission Tower bridge, Burbank Western Channel, and Verdugo Wash . As the HSR Build Alternative would include alterations or modifications to these federal USACE flood control facilities, the Authority would be required to coordinate with the Los Angeles County Flood Control District and USACE to obtain Section 408 review for the Los Angeles River, Burbank Western Channel, and Verdugo Wash. Therefore, Impacts #7 and #8 in Section 3.8.6.3 of this Final EIR/EIS have been revised to state that review from the USACE under Section 408 is also required for modifications to the Los Angeles River, Burbank Channel, and Verdugo Wash. Discussion regarding potential impacts to the Los Angeles River, Burbank Western Channel, and Verdugo Wash is included within Section 3.8, Hydrology and Water Quality, of this Final EIR/EIS. During final design, engineering plans and hydrology studies will be submitted to the LACFCD through EPIC-LA, and all applicable permits and approvals will be obtained from the LACFCD prior to commencement of construction.

762-1163

The commenter states that People Experiencing Homelessness (PEH) may use the HSR infrastructure for shelter within the LACFCD right of way and should be identified and mitigation provided.

The Draft EIR/EIS did not evaluate the HSR project's potential to construct infrastructure that could shelter PEH encampments. Unfortunately, given the widespread prevalence of homelessness in the Los Angeles County region, any building walls, overhangs, overpasses, public seating areas, public plazas, or park space could accommodate PEH encampments. It would be overly speculative to assume that any of the project's overpasses would attract illegal trespassing (PEH encampments) to a greater extent than other projects that would include similar features.

The roadways under the new grade separations and the area under the historic Main Street bridge, which will remain in place, could be used by PEH. However, any legal enforcement would be the responsibility of those agencies who have jurisdiction of those roadways and infrastructure.

762-1164

The commenter requests that elevation data points for the invert and top of channel for the Los Angeles River be included in the existing plan views for the river crossings. The Authority acknowledges this request, but at the current preliminary level of design included in the scope of the PEPD, there are some data limitations. However, all river crossings are identified on the plan and profile sheets, with existing ground shown in relation to the track alignment which provides sufficient data for analysis of impacts for purposes of CEQA and NEPA. The commenter's requested data will be included in the plans prepared at the 30% level of engineering design, which will commence after the completion of this EIR/S during future phases of design as the project progresses to construction.

Response to Submission 762 (Toan Duong, Los Angeles County Public Works, July 30, 2020) - Continued

762-1165

The commenter provides a list of locations wherein active bridge maintenance projects are under way and may present conflicts. The commenter does not provide information as to the timing or duration of the maintenance activities; however, any other construction activities in the vicinity of HSR construction would be taken into account in the Construction Transportation Plan established as required in TR-IAMF #2, in Section 3.2.4.2 and described in detail in Appendix 2-B, Project Impact Avoidance and Minimization Features. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020)

Burbank - Los Angeles - RECORD #783 DETAIL

Status :	Unread
Record Date :	8/3/2020
Submission Date :	8/3/2020
Interest As :	Local Agency
First Name :	Kathryn
Last Name :	Laudeman
Attachments :	ES20-0441 Burbank to LA CHSRA Comment Letter FINAL-np.pdf (877 kb) STANDARD CONSTRUCTION CONDITIONS_CALIFORNIA.pdf (79 kb) Access Road Design Criteria & Details.pdf (161 kb) CONDUCTOR SURVEY INSTRUCTIONS 0113 (1).pdf (153 kb)

Stakeholder Comments/Issues :

Hello,

Please see LADWP's comments on the Burbank to Los Angeles Section of the California High Speed Rail Project.

If you have any questions, please let me know.

Thank you,

Kathryn Laudeman
Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012
213-367-6376
kathryn.laudeman@ladwp.com<mailto:kathryn.laudeman@ladwp.com>

783-1345

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783-1346

783-1347

783-1348

LA DWP Los Angeles Department of Water & Power
CUSTOMERS FIRST

Eric Garcetti, Mayor

Board of Commissioners
Mel Levine, President
Cynthia McClain-Hill, Vice President
Jill Banks Barad
Nicole Neeman Brady
Susana Reyes
Susan A. Rodriguez, Secretary

Martin L. Adams, General Manager and Chief Engineer

July 31, 2020

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

Dear Sir or Madam:

Subject: Comment Letter Regarding the Draft Environmental Impact Report/Environmental Impact Statement for the Burbank to Los Angeles Section of the California High-Speed Rail

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comment on the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Burbank to Los Angeles Section of the California High-Speed Rail. The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. In reviewing the proposed Project, the LADWP has determined that the project may have impacts to water and power infrastructure and respectfully submits the comments below.

POWER SYSTEM COMMENTS:

1. California High-Speed Rail Authority (CHSRA) shall pertain to its employees, agents, consultants, contractors, officers, patrons, or invitees of CHSRA's affiliated entities.

2. LADWP will require a License Agreement between LADWP and CHSRA for the proposed improvements within LADWP fee-owned property. The Standard Terms and Conditions of the Real Estate Group's License Agreement form shall apply.

3. LADWP notes that the latest Risk Management liability and insurance clauses shall apply.

4. After review of the CHRSA Preliminary Engineering for Project Definition (PEPD) plans, it has been identified that the proposed developments will impact Water System's facilities and will require Water System's review and approval. Please submit a request to the LADWP Water System.

111 N. Hope Street, Los Angeles, California 90012-2607 Mailing Address: PO Box 51111, Los Angeles, CA 90051-5700
Telephone (213) 367-4211 ladwp.com

Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1349

5. LADWP Power System has reviewed the PEPD plans provided by the CHRSA and identified that several alignment features proposed by the environmental study will impact LADWP's Transmission Line Right of Way (TLRW). Please provide plans illustrating the LADWP's TLRW boundaries within the Burbank to Los Angeles Project Section. Illustrate the proposed alignment feature crossing LADWP's TLRW. Include towers and setbacks from the proposed alignments. Label towers according to how they are labeled on site and illustrate the overhead electrical conductors. Also, provide grading plans, storm drain plans, utility plans, and conductor surveys, including any pertinent plans illustrating the impacts to LADWP's TLRW.

783-1350

6. Right-of-Way Engineering will coordinate with LADWP Overhead Distribution Group to receive comments on any impacts CHRSA's proposed Project may have on the LADWP Distribution System. Since this is a new rail being installed, DWP policy is to convert the overhead crossing to an underground crossing.

Conditions:

783-1351

1. LADWP requests that CHRSA acknowledge that the LADWP's Transmission Line Rights of Way are integral components of the transmission line system, which provides electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the Federal North American Electric Reliability Corporation. Safety and protection of critical facilities are the primary factors used to evaluate secondary land use proposals. The rights of way serve as platforms for access, construction, maintenance, facility expansion and emergency operations. Therefore, the proposed use may from time to time be subject to temporary disruption caused by such operations.

783-1352

2. LADWP's Overhead Transmission Engineering Group will need to review and approve Conductor Clearances. The LADWP will require a copy of the conductor survey illustrating the cross sections showing our existing conductors and proposed improvements. See enclosed LADWP Conductor Survey Instructions. The Overhead Transmission Engineering Group will use the data to calculate and confirm conductor clearances meet the State of California, Public Utilities Commission, General Order No. 95 clearances.

783-1353

3. LADWP requests that all construction activities adhere to conditions 1-9, 11A, 12 to 23B, 25, 27 to 30A, and 31B to 32 of the LADWP's Standard Conditions for Construction. See enclosed.

783-1354

4. LADWP requests that CHRSA provide the location and elevations (heights) of all above and below ground structures, including the cross sections of existing and proposed improvements within and adjacent to the LADWP's TLRW. Cut and fill slopes inside the LADWP's TRLW steeper than two horizontals to one vertical require retaining structures or geotechnical report approval.

   Note: Grading activity resulting in a vertical clearance between the ground and the transmission line conductor elevation less than 35 feet or as noted in the State of California, California Public Utilities Commission, General Order 95 within the LADWP's transmission line right of way is unacceptable. Ground cover for all below ground utilities shall not be less than four feet unless otherwise stated.

783-1355

5. LADWP requests that when grading activity affects the transmission line access roads, CHSRA shall replace the affected access roads according to the requirements specified in LADWP's Access Road Design Criteria. See enclosed.

783-1356

6. LADWP requests that a detailed design of the cathodic protection system be submitted for approval. Cathodic protection system, if any, shall have a design that does not cause corrosion to the LADWP facilities.

783-1357

7. LADWP requests that all aboveground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures located within or adjoining the right of way be properly grounded and insulated from any fencing or other conductive materials located outside of the right of way. For safety of personnel and equipment, all equipment and structures shall be grounded in accordance with State of California Code of Regulations, Title 8, Section 2941, and National Electric Code, Article 250.

783-1358

8. LADWP notes that the right of way contains high-voltage electrical conductors; therefore, CHSRA shall utilize only such equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes, including the following: State of California Code of Regulations, Title 8, Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 5, Electrical Safety Orders; California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Line Construction.

783-1359

9. LADWP requests that no grading be conducted within the LADWP's TLRW without prior written approval of the LADWP.

Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1360

10. LADWP requests that no structures be constructed within the LADWP's TLRW without prior written approval of the LADWP.

783-1361

11. LADWP prohibits drainage structures or the discharging of drainage onto the TLRW. Concentrated runoff can cause erosion especially to the tower footings.

783-1362

12. LADWP requests that CHSRA compact all fill slopes within the LADWP's TLRW. The compaction shall comply with applicable Building Code requirements.

783-1363

13. LADWP requests that an area at least 50 feet around the edge of each tower footing must remain open and unobstructed for necessary maintenance, including periodic washing of insulators by high pressure water spray.

783-1364

14. LADWP prohibits grading below the top of tower footing within the LADWP's TLRW, in the immediate vicinity of the towers.

783-1365

15. LADWP may require additional conditions following review of detailed site plans, grading/drainage plans, etc.

783-1366

16. LADWP notes that CHRSA shall be responsible for the maintenance of the various project areas and shall keep the areas in a neat and clean condition within LADWP's TLRW, including all the risks and liabilities associated with the proposed Project. LADWP will not be liable for any damage to the proposed Project during LADWP's operation and maintenance of impacted transmission lines.

783-1367

17. LADWP requires a permanent, unobstructed 20-foot minimum wide roadway (patrol road), accessible at all times by LADWP maintenance personnel to be provided and maintained by CHSRA. A wider roadway width may be required on curved segments. The roadway must remain open and unobstructed, excluded from any watering and kept as dry as possible at all times.

783-1368

18. LADWP requests that CHSRA have at least one qualified electrical worker on site to observe said work and ensure all required safety protocols are followed. As used herein "qualified electrical workers" shall mean "a qualified person who by reason of a minimum of two years of training and experience with high-voltage circuits and equipment and who has demonstrated by performance familiarity with the work to be performed and the hazards involved".

783-1369

19. LADWP prohibits equipment taller than 14 feet, when fully extended, be used under LADWP's TLRW. This height restriction includes the operation of any apparatus attached to the equipment. It is CHSRA's responsibility to comply with all applicable standards and safety regulations while working near or under high voltage overhead transmission lines. The use of equipment over 14 feet tall will require CHSRA to perform and provide a Conductor Survey of the LADWP transmission lines. The Conductor Survey data will then be reviewed by LADWP.

783-1370

20. LADWP requests that if excavations are required, utility agencies within the proposed excavation sites shall be notified of impending work. CHSRA shall be responsible for coordinating relocation of utilities, if any, within the project boundaries. Before commencing any excavations, Underground Service Alert (a.k.a. DigAlert) shall be notified.

783-1371

21. LADWP requests that if given project approval, CHSRA shall notify the LADWP's Transmission Construction and Maintenance Business Group, at (818) 771-5014 or (818) 771-5076 no earlier than 14 days prior to the start of any grading, paving, or construction work within the LADWP TLRW.

783-1372

22. LADWP notes that this reply shall in no way be construed as an approval of any project.

WATER SYSTEM COMMENTS

Section 3.6 – Public Utilities and Energy

783-1373

1. LADWP's water infrastructure may be located within close proximity to the proposed Project. Please contact LADWP for information about the location of the water infrastructure to ensure proper protection of the utilities and coordination during design and construction process. The CHSRA shall be responsible for any relocation or asset protections deemed necessary during the design and construction process.

783-1374

2. To establish a water service connection for the project, please contact LADWP for more information. LADWP's contact and general information can be found at www.ladwp.com.

Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

Burbank to Los Angeles Project Section: Draft EIR/EIS
Page 6
July 31, 2020

783-1375

3. To estimate the existing water usage for the area within the High-Speed Rail (HSR) Build Alternative project footprint, estimates for resident and employee displacements resulting from the HSR Build Alternative were multiplied by an estimated per capita water usage rate. Please clarify how the per capita water factor was used. Perhaps consider using a modified per capita rate for the downtown area.

783-1376

4. To estimate existing water use at Los Angeles Union Station (LAUS), wastewater generation estimates from District No. 19 of the Sanitation Districts of Los Angeles County were used. Why wasn't actual LADWP data used to determine existing water usage?

783-1377

5. Estimated future demand for LAUS is 167.6 acre-feet/year. How was the multiplier for future demand determined?

783-1378

6. Engineers for the Burbank to Los Angeles Project Section estimate that there would be no construction water use for LAUS. Why is no construction water use anticipated? The summary states LAUS would include up to four HSR tracks and two 870-foot platforms (with the possibility of extending to 1,000 feet).

783-1379

7. CHRSA stated that because the stations are expected to require less than 250 acre-feet/year, water supply assessments would not be needed for these facilities, and no other special actions to secure water from the local agencies would be necessary. Vol 1-Summary states 'Operational Water Demand' to be significant. MM#2 will verify or change this statement.

Section 3.6.6.3 - Public Utilities and Energy, High-Speed Rail Build Alternative, Table 3.6-13, Page 3.6-52

783-1380

1. This table shows that LADWP's 2015 Urban Water Management Plan (UWMP) shows surplus water of 1,588,000 acre-feet per year (afy) in 2020, 1,699,00 afy in 2030, and 1,777,000 afy in 2040. However, these projected surplus amounts shown in 2015 LADWP UWMP Exhibit 11B on page 11-7 are Metropolitan Water District of Southern California (MWD)'s, not LADWP's. Please revise the table to reference the proper supplier of water.

Exhibit 11B is used to demonstrate MWD's capability to provide reliable water to its member agencies, and MWD water is an important component of LADWP's water supply reliability.

Burbank to Los Angeles Project Section: Draft EIR/EIS
Page 7
July 31, 2020

Section 3.6.7 - Public Utilities and Energy, Mitigation Measures, Page 3.6-65

783-1381

1. Mitigation Measure PUE-MM#2 states that the CHSRA (Authority) will prepare an updated water demand analysis in coordination with LADWP for the HSR Build Alternative at LAUS to determine if allocations for additional water supply are needed for project operation at LAUS. However, Appendix 3.6-B Water Usage Analysis Technical Memorandum states on page 7 that because the stations (Burbank Water and Power Station and LAUS) are expected to require less than 250 afy (each), water supply assessment would not be needed for these facilities, and no other special actions to secure water from the local agencies would be necessary.

   Please verify if this project's water demand is subject to California Water Code Sections 10910-10915 and that a water supply assessment would be prepared by the applicable public water system(s).

783-1382

2. Applicants are encouraged to commit to water conservation measures that are beyond the current codes and ordinances, in order to lower the net additional water demand for the proposed Project. For more information on water conservation in the City of Los Angeles, please visit the LADWP website https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation?_adf.ctrl-state=13bbfqguqy_4&_afrLoop=360262976023589.

Section 3.8 – Hydrology and Water Resources

783-1383

1. The planned CHSRA Burbank to Los Angeles Project (Project) alignment includes a below grade section that requires tunneling through the San Fernando Basin (SFB) and dewatering the SFB's groundwater to facilitate the underground construction. These activities could potentially impact and/or deplete the SFB's groundwater supplies, a principle groundwater resource in the Upper Los Angeles River Area (ULARA).

   The City of Los Angeles (City) relies on groundwater from the SFB to supply its over four million customers. The City has prior and paramount pueblo water rights to the native ground waters rights, as well as the right to store and recapture water, as set forth in the judgment in The City of Los Angeles vs. City of San Fernando, Los Angeles Superior Court Case No. 650079, dated January 26, 1979 (ULARA Judgment). To avoid impacting the City's rights, the project should incorporate the following:

Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1384

A. Establish communication with the court appointed ULARA Watermaster, Richard C. Slade & Associates LLC, 14051 Burbank Boulevard, Suite 300, Sherman Oaks, CA 91401, Phone (818) 506-0418, http://ularawatermaster.com/ and LADWP staff Manuel Aguilar at (213) 367-3465 or via email at Manuel.Aguilar@ladwp.com. The ULARA Judgment requires safe yield operations for the SFB to ensure groundwater extractions over the long-term do not create a condition of overdraft. Basin management in SFB is achieved by collective efforts of a court-appointed Watermaster and an administrative committee consisting of representatives from the City's LADWP and other public water supply agencies.

783-1385

B. Install flow meters on extraction wells and report extractions to LADWP. Contact LADWP staff Manuel Aguilar at (213) 367-3465 or via email at Manuel.Aguilar@ladwp.com for information on how to report extractions.

783-1386

C. Compensate the City by annual payment for the loss incurred from groundwater extractions. Contact LADWP staff Manuel Aguilar at (213) 367-3465 or via email at Manuel.Aguilar@ladwp.com for more information.

783-1387

2. Section 3.8 of the EIR states that, during the construction period, water would be used for different activities. Beneficial reuse of dewatering discharge (as an alternative to discharging to the storm drain or sewer) on or off-site is encouraged as a conservation measure. In addition to water conservation, beneficial reuse may reduce or eliminate costs associated with storm drain and sewer permitting and monitoring. Common applications of Beneficial Reuse include, Landscape irrigation, Cooling tower make-up, and Construction (dust control, concrete mixing, soil compaction, etc.)

For any questions regarding the above comments, please contact Ms. Kathryn Laudeman, at (213) 367-6376 or Kathryn.laudeman@ladwp.com.

Sincerely,

Charles C. Holloway
Manager of Environmental Planning and Assessment

KL:gn
Enclosures
c/enc: Ms. Kathryn Laudeman

STANDARD CONDITIONS FOR CONSTRUCTION

1. Energized transmission lines can produce electrical effects including, but not limited to, induced voltages and currents in persons and objects. Licensee hereby acknowledges a duty to conduct activities in such manner that will not expose persons to injury or property to damage from such effects.

2. The Los Angeles Department of Water and Power (LADWP) personnel shall have access to the right of way at all times.

3. Unauthorized parking of vehicles or equipment shall not be allowed on the right of way at any time.

4. Unauthorized storage of equipment or material shall not be allowed on the right of way at any time.

5. Fueling of vehicles or equipment shall not be allowed on the right of way at any time.

6. Patrol roads and/or the ground surfaces of the right of way shall be restored by the Licensee to original conditions, or better.

7. All trash, debris, waste, and excess earth shall be removed from the right of way upon completion of the project, or the LADWP may do so at the sole risk and expense of the Licensee.

8. All cut and fill slopes within the right of way shall contain adequate berms, benches, and interceptor terraces. Revegetation measures shall also be provided for dust and erosion control protection of the right of way.

9. All paving, driveways, bridges, crossings, and substructures located within the right of way shall be designed to withstand the American Association of State Highway and Transportation Officials' vehicular loading H20-44 or HL-93. The design shall also comply with applicable design standards.

~~10. The location of underground pipelines and conduits shall be marked at all points where they cross the boundaries of the right of way and at all locations where they change direction within the right of way. The markings shall be visible and identifiable metal post markers for underground pipelines. Utility markers flush with surface may be used on pavement.~~

11A. General Grounding Condition

All aboveground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures located within or adjoining the right of way shall be properly grounded, and shall be insulated from any fencing or other conductive materials located outside of the right of way. For safety of personnel and equipment, all equipment and structures shall be grounded in accordance with State of California Code of Regulations, Title 8, Section 2941, and National Electric Code, Article 250.

Rev. 5-16-18

Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

~~11B. Grounding Condition for Cellular Facilities on Towers~~

~~All aboveground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures located within or adjoining the right of way shall be properly grounded, and shall be insulated from any fencing or other conductive materials located outside of the right of way. For safety of personnel and equipment, all equipment and structures shall be grounded in accordance with American National Standards Institute of Electrical and Electronics Engineers Standard 487 latest edition, IEEE Guide for Safety in AC Substation Grounding.~~

12. Licensee shall neither hold the LADWP liable for nor seek indemnity from the LADWP for any damage to the Licensee's project due to future construction or reconstruction by the LADWP within the right of way.

13. Fires and burning of materials is not allowed on the right of way.

14. Licensee shall control dust by dust-abatement procedures approved by the LADWP, such as the application of a dust palliative or water.

15. The right of way contains high-voltage electrical conductors; therefore, the Licensee shall utilize only such equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes, including the following: State of California Code of Regulations, Title 8, Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 5, Electrical Safety Orders; and California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Line Construction.

16. Licensee is hereby notified that grounding wires may be buried in the right of way; therefore, the Licensee shall notify the LADWP's Transmission Construction and Maintenance Business Group at (818) 771-5014, or (818) 771-5076, at least 48 hours prior to the start of any construction activities in the right of way.

17A. Vehicle Parking

An area within 50 feet around the base of each tower must remain open and unobstructed for maintenance and emergencies, including periodic washing of insulators by high-pressure water spray. Clearances of 100 feet may be required under circumstances where access is limited.

17B. Trucking Operations and Storage Operations

An area within 50 feet around the base of each tower must remain open and unobstructed for maintenance and emergencies, including periodic washing of insulators by high-pressure water spray. Clearances of 100 feet may be required under circumstances where access is limited.

17C. Permanent Structures

An area within 100 feet on all sides of each tower shall remain open and unobstructed for maintenance and emergencies, including periodic washing of insulators by high-pressure water spray.

18. Detailed plans for any grading, paving, and construction work within the right of way

shall be submitted for approval to the Real Estate Services, 221 N. Figueroa St., Suite 1600, Los Angeles, California 90012, no later than 45 days prior to the start of any grading, paving, or construction work. Notwithstanding any other notices given by Licensee required herein, Licensee shall notify the LADWP's Transmission Construction and Maintenance Business Group at (818) 771-5014, or (818) 771-5076, no earlier than 14 days and no later than two days prior to the start of any grading, paving, or construction work.

19. "As Constructed" drawings showing all plans and profiles of the Licensee's project shall be furnished to the Real Estate Services, 221 N. Figueroa St., Suite 1600, Los Angeles, California 90012, within five days after completion of Licensee's project.

20. In the event that construction within the right of way is determined upon inspection by the LADWP to be unsafe or hazardous to the LADWP facilities, the LADWP may assign a line patrol mechanic at the Licensee's expense.

21. If the LADWP determines at any time during construction that the Licensee's efforts are hazardous or detrimental to the LADWP facilities, the LADWP shall have the right to immediately terminate said construction.

22A. All concentrated surface water which is draining away from the permitted activity shall be directed to an approved storm drain system where accessible, or otherwise restored to sheet flow before being released within or from the right of way.

22B. Drainage from the paved portions of the right of way shall not enter the unpaved area under the towers. Drainage diversions such as curbs shall be used on three sides of each tower. The open side of each tower shall be the lowest elevation side to allow storm water which falls under the tower to drain. The area under the towers shall be manually graded to sheet flow out from under the towers.

22C. Ponding or flooding conditions within the right of way shall not be allowed, especially around the transmission towers. All drainage shall flow off of the right of way.

22D. Licensee shall comply with all Los Angeles County Municipal Storm Water Permit and Standard Urban Storm Water Mitigation Plan requirements.

23A. Fills, including backfills, shall be in horizontal, uniform layers not to exceed six inches in thickness before compaction, then compacted to 90 percent relative compaction in accordance with the American Society for Testing and Materials D1557.

23B. The top two inches to six inches of the concrete footings of the towers shall remain exposed and not covered over by any fill from grading operations.

~~23C. Licensee shall provide the LADWP with one copy each of the compaction report and a Certificate of Compacted Fill, for clean fill compaction within the LADWP's right of way in accordance with the American Society for Testing and Materials D1557, approved by a geotechnical engineer licensed in the State of California.~~

~~24. A surety bond in the amount to be determined by the LADWP shall be supplied by the Licensee to assure restoration of the LADWP's right of way and facilities, and compliance with all conditions herein.~~

25. The Licensee shall obtain and pay for all permits and licenses required for performance of the work and shall comply with all laws, ordinances, rules, orders, or regulations

Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

including, but not limited to, those of any agencies, departments, districts, or commissions of the State, County, or City having jurisdiction thereover.

~~26. The term "construction", as used herein, refers only to that construction incidental to the maintenance or repair of the existing (requested facility) and shall not be construed to mean permission to construct any additional (requested facility).~~

27. Signs shall not exceed four feet wide by eight feet long, shall not exceed a height of 12 feet, shall be constructed of noncombustible materials, and shall be installed manually at, and parallel with, the right of way boundary.

28. Remote-controlled gates, or lock boxes containing the device or key for opening the remote-controlled gates, shall be capable of being interlocked with an LADWP padlock to allow access to the right of way by the LADWP. Licensee shall contact LADWP's Transmission Construction and Maintenance Business Group at (818) 771-5014, or (818) 771-5076, to coordinate the installation of an LADWP padlock.

29. Licensee's cathodic protection system, if any, shall have a design that does not cause corrosion to LADWP facilities. A detailed design of the Licensee's cathodic protection system shall be submitted for approval to the Real Estate Services, 221 N. Figueroa St., Suite 1600, Los Angeles, California 90012, no later than 45 days prior to the start of construction or installation of the cathodic protection system.

30A. Licensee shall install K-rails at a distance of ten feet from each side of the tower base for protection of towers. A distance of five feet from the tower base may be acceptable in locations where the patrol roads would be obstructed.

~~30B. Licensee shall install removable pipe bollards, spaced four feet apart, and at a distance of ten feet from each side of the tower base for protection of towers. A distance of five feet from the tower base may be acceptable in locations where the patrol roads would be obstructed.~~

~~31A Licensee shall provide and maintain a minimum 20-foot wide transition ramp for the patrol roads from the pavement to the ground surface. The ramp shall not exceed a slope of ten percent.~~

31B. Licensee shall provide and maintain a minimum 20-foot wide driveway and gate at all locations where the (road/street) crosses the LADWP's patrol roads. The designed gates must be capable of being interlocked with an LADWP padlock to allow access to the right of way by the LADWP.

32. Licensee shall post a sign on the entrance gate to the right of way, or in a visible location inside the entrance gate, identifying the contact person's name and telephone number for the prompt moving of (vehicles/trucks/trailers/containers) at times of LADWP maintenance or emergency activities, or any other event that (vehicles/trucks/trailers/containers) must be moved. In emergency conditions, the LADWP reserves all rights at any time to move or tow (vehicles/trucks/trailers/containers) out of specific areas for any transmission operation or maintenance purposes.

4

ACCESS ROAD DESIGN CRITERIA

1. When grading activity affects the Transmission Line access roads, the developer shall replace the affected access roads using the following access road design criteria. Typical Road Sections are illustrated in Attachment.

2. The access road right-of-way width shall be 50 feet minimum.

3. The access road drivable width shall be 20 feet minimum, and increased on curves by a distance equal to 400 divided by the radius of curve. Additional width on either side of the road shall be provided for berms and ditches, as detailed in the attached Typical Road Sections.

4. The minimum centerline radius of curves shall be 50 feet.

5. The vertical alignment grades shall be limited to 10 percent or paved at a maximum of 15 percent.

6. Roads entirely located on fills or with cross sections showing more than 30 percent fill along the drivable width of the road require paving.

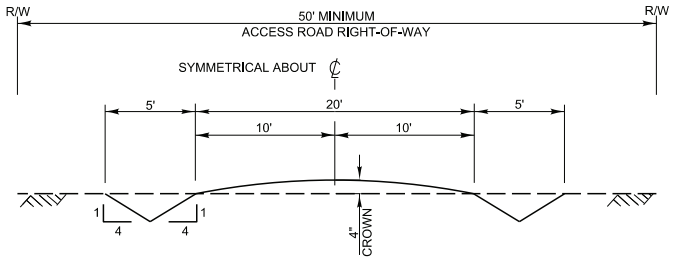
7. Intersections or driveways shall have a minimum sight distance of 300 feet in either direction along the public street.

8. The developer shall provide a commercial driveway at locations where the replaced access roads terminate at, or cross public roads.

9. The developer shall provide lockable gates on LADWP property or easement at locations where access roads terminate or cross public roads.

Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

LOS ANGELES DEPARTMENT OF WATER AND POWER
TRANSMISSION LINE ACCESS ROAD DETAILS

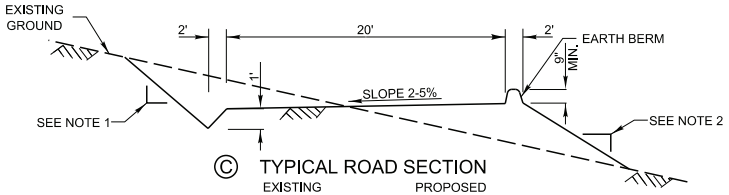


Ⓐ TYPICAL ROAD SECTION

EXISTING CROSS SLOPE	PROPOSED ROAD GRADE
≤ 5%	≤ 10%
	10-15% (PAVEMENT REQUIRED)

Ⓑ TYPICAL ROAD SECTION

EXISTING CROSS SLOPE	PROPOSED ROAD GRADE
5-15%	≤ 10%
	10-15% (PAVEMENT REQUIRED)



Ⓒ TYPICAL ROAD SECTION

EXISTING CROSS SLOPE	PROPOSED ROAD GRADE
15-50%	≤ 10%
	10-15% (PAVEMENT REQUIRED)

NOTES:
1. CUT SLOPE SHALL NOT EXCEED THE FOLLOWING:
   A. 2 HORIZONTAL TO 1 VERTICAL IN LOOSE OR UNSTABLE MATERIAL.
   B. 1 HORIZONTAL TO 1 VERTICAL IN COMPACTED MATERIAL.
   C. 1/2 HORIZONTAL TO 1 VERTICAL IN SOLID ROCK.
2. ALL FILL SLOPES SHALL BE 2 HORIZONTAL TO 1 VERTICAL OR FLATTER.
3. WHERE SOLID ROCK IS ENCOUNTERED THE 4" CROWN AND, OR SIDE DITCHES MAY BE ELIMINATED WHERE DIRECTED BY THE ENGINEER.

CONDUCTOR SURVEY
DEPARTMENT OF WATER AND POWER
OVERHEAD TRANSMISSION ENGINEERING

Please perform a survey of each Department transmission line affected by the project. For each span (the section of wire between two (2) towers) provide the following information:

1. The tower numbers of the Department transmission lines related to the span. The tower number is located near ground level on at least one (1) leg of each tower.

2. Survey the top-of-concrete of each footing of each tower related to this survey. For example, a survey involving one (1) span would involve two (2) towers, each with four (4) footings, for a total of eight (8) top-of-concrete shots.

3. Survey at least eight (8) points along the span – the two (2) points where the insulator attaches to the tower, the two (2) points where the wire attaches to the insulator, and four (4) additional points along the wire (preferred spacing of 200 – 300 feet). See attached Conductor Attachments Points for additional information. Include additional points where special features of the proposed improvements cross the transmission line (such as high points, street lights, signs, etc.). For each point provide the following information:

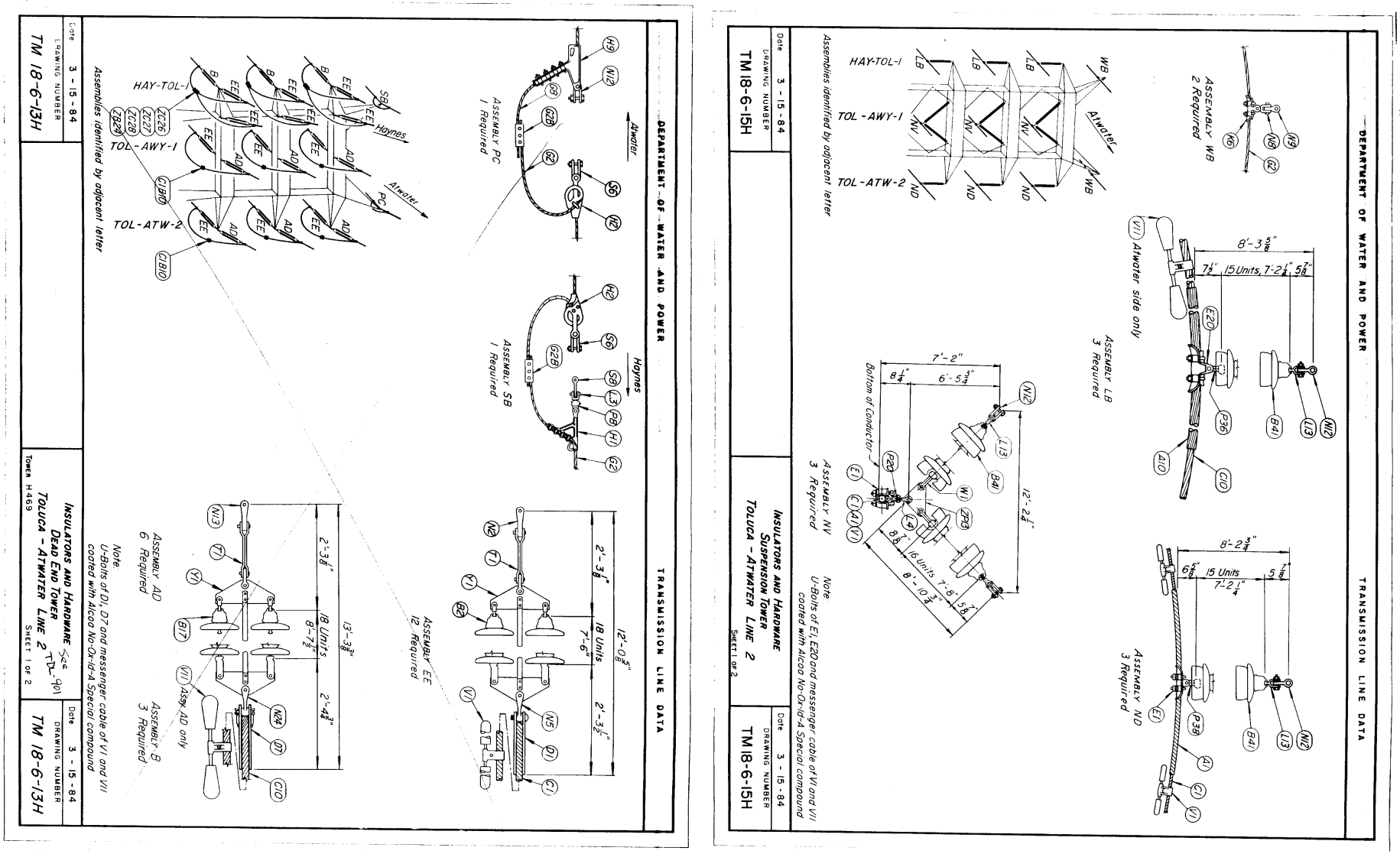
   a. The northing and easting coordinates and elevations of conductor and ground points
   b. The elevation of the wire
   c. The existing ground coordinates and elevation
   d. The proposed ground elevation
   e. Date and Time
   f. Temperature
   g. Sunlight (sunny, partly cloudy, or cloudy)
   h. Approximate wind speed

   Important: All eight (8) wire shots on each individual span shall be completed within one (1) hour after the first wire shot is made. Failure to comply with this requirement will render data useless.

   * See attached Data Sheet for sample of submittal document.

Updated:01/17/2013

Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued



Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

LOS ANGELES DEPARTMENT OF WATER AND POWER
TRANSMISSION LINE CONDUCTOR CLEARANCE SURVEY
DATA SHEET

SURVEYED BY:

PAGE: _____ BENCHMARK: _____

TRANSMISSION LINE R/W: _____

DESCRIPTION (TWR#, FOOTING, COND ATTACHMENT POINT, CONDUCTOR, GROUND, ETC.)	SPAN NUMBER	NORTHING	EASTING	ELEVATION	PROPOSED IMPROV. ELEV.	SURVEY DATE	TIME

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020)

783-1345

The commenter defines how the term "CHSRA" is used by LADWP in its comments and therefore does not raise substantive questions about the environmental analysis contained in the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). As such, no revisions to the Final EIR/EIS have been made in response to this comment.

783-1346

The commenter states that the Los Angeles Department of Water and Power (LADWP) will require a License Agreement between the LADWP and the Authority for the proposed improvements within LADWP fee-owned property and that the Standard Terms and Conditions of the Real Estate Group's License Agreement form shall apply. The Authority will coordinate with LADWP on the License Agreement at later stages of design.The Authority acknowledges this statement; however, this comment does not raise substantive questions about the environmental analysis contained in the Draft EIR/EIS. As such, no revisions to the Final EIR/EIS have been made in response to this comment.

783-1347

The commenter states that the latest risk management liability and insurance clauses shall apply. Refer to response to comment 783-1346 for a discussion for the License Agreement that will be required between LADWP and the Authority. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1348

The commenter states that it has identified that the proposed developments will impact the LADWP Water System's facilities and will require its review and approval. The commenter states that a request should be submitted to the LADWP Water System. This Authority acknowledges this statement. As discussed on page 3.6-53 of the Draft EIR/EIS, the Authority would work with utility owners during final engineering design and construction of the High-Speed Rail (HSR) Build Alternative to relocate utilities or protect them in place. It is anticipated that all utilities can be relocated and modified within the construction footprint. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1349

The commenter has requested that the Authority provide plans illustrating the HSR Build Alternative crossing the Los Angeles Department of Water and Power's (LADWP) transmission line right-of-way (TLRW) boundaries. It is anticipated that the HSR Build Alternative will remain within the existing rail right-of-way outside of LADWP property except near Main Street where systems are proposed within the existing employee surface parking lot. It is also anticipated that the HSR Build Alternative will protect-in-place transmission towers along the alignment with the possible exception of the area near Main Street. The right-of-way sheets as contained in the PEPD plans in Volume 3 of this Final EIR/EIS demonstrate an impact at each respective parcel without details regarding the proximity to the parcel boundary. Volume 3.4 of this Final EIR/EIS provides grading and utility plans at a preliminary level. These designs are preliminary in nature and more detail will be developed during final design. The Authority will continue to coordinate with LADWP in future phases of design.

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1350

The commenter has requested that Right-of-Way Engineering coordinate with the LADWP Overhead Distribution Group to receive comments on any impacts the HSR Build Alternative may have on the LADWP Distribution System. The Authority commits to establishing a memorandum of understanding with LADWP during a later stage of design in order to thoroughly address potential effects on the LADWP distribution system. A detailed survey of utilities in the area would take place at a 30% engineering design level. Overhead transmission lines will be converted to underground lines primarily at proposed grade separations per PEPD Volume 3.4 Utility Sheets of this Final EIR/EIS. Locations where underground relocation were not considered are not anticipated to be in vertical conflict beyond the existing condition.

783-1351

The commenter requests that the Authority acknowledge the LADWP's transmission line rights-of-way as integral components of the transmission line system, which serve as platforms for access, construction, maintenance, facility expansion, and emergency operations. Specific utility systems were not discussed in the Draft EIR/EIS, due to the abundance of utility infrastructure within the resource study area (RSA) and because of the Authority's commitment to protect in place or relocate any utility infrastructure that is impacted by the HSR Build Alternative. The LADWP transmission line rights-of-way are geographically encompassed within the Authority RSA for public utilities and energy. Impacts to existing utilities, including transmission systems that provide electric power within the RSA, are discussed in Section 3.6 of this Final EIR/EIS, specifically in Impact PU&E#1, Temporary Interruption of Utility Service, and Impact PU&E#2, Accidents and Disruption of Services. As discussed in Impact PU&E#1, design characteristics of the HSR Build Alternative would include measures to effectively minimize temporary interruption of utility service by adhering to PUE-IAMF#3 and PUE-IAMF#4. PUE-IAMF#3 would require the construction contractor to notify the public of any planned outages through a combination of media. As described in PUE-IAMF#4, prior to construction, the contractor would prepare a technical memorandum documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. As discussed in Impact PU&E#2, the potential for accidental disruption of utility systems is low due to the established practices of utility identification and notification. If accidental disruptions of utility services occur, they would be short in duration yet noticeable to utility users. Section 3.6 of this Final EIR/EIS acknowledges the extent of potential utility conflicts within the RSA, acknowledges the potential for disruptions, and provides design features that would adequately minimize risks associated with temporary disruptions in the proposed use of the LADWP's transmission line system. No revisions to the Final EIR/EIS have been made in response to this comment.

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1352

The commenter states that LADWP's Overhead Transmission Engineering Group will need to review and approve Conductor Clearances. The Authority commits to establishing a memorandum of understanding with LADWP during a later stage of design in to thoroughly address potential effects on the LADWP distribution system. A detailed survey of utilities in the area would take place at a 30% engineering design level.

783-1353

The commenter requests that all construction activities should adhere to Conditions 1-9, 11A, 12 to 23B, 27 to 30A, and 31B to 32 of the LADWP's Standard Conditions for Construction. Construction activities will be coordinated with LADWP in the future and will adhere to the LADWP requirements mentioned. Refer to IAMF-PU&E#4 in Section 3.6.4.2 of this Final EIR/EIS, which requires the construction contractor to prepare a technical memorandum documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. This memorandum will be prepared in coordination with LADWP, and LADWP's Standard Conditions for Construction would be included to ensure that all standards are met during construction activities. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1354

The commenter requests that the Authority provide the locations and elevations (heights) of all above- and below-ground structures, including the cross sections of existing and proposed improvements within and adjacent to the LADWP's TLRW. Design details appropriate for this stage of project design are included in Volume 3 of this Final EIR/EIS. The Authority will coordinate with LADWP as the project design progresses.

783-1355

The commenter states that the Authority should replace all access roads affected by grading activity that affects the transmission line access roads according to the requirements specified in LADWP's Access Road Design Criteria. The Authority will replace affected access roads and provide the requested easement if existing LADWP access roads are impacted by the project. Refer to IAMF-PU&E#4 in Section 3.6.4.2 of this Final EIR/EIS, which requires the construction contractor to prepare a technical memorandum documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. At the time this memorandum is prepared in coordination with LADWP, LADWP's Access Road Design Criteria would be included to ensure that all affected access roads are replaced according to LADWP requirements. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1356

The commenter requests that a detailed design of the cathodic protection system be submitted for approval. Although this level of detail is not provided in the current PEPD as included in Volume 3 of this Final EIR/EIS, it would be defined when the project engineering design level reaches 30%. The Authority will coordinate with LADWP to make the requested information available as the project advances to more detailed design.

783-1357

The commenter requests that all above-ground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures within or adjoining the HSR right-of-way be properly grounded and insulated from any fencing or other conductive materials outside of the right of way. Although this level of detail is not provided in the current PEPD as included in Volume 3 of this Final EIR/EIS, it will be defined at 30% design. Section 3.5.6.3 provides an analysis in EMI/EMF-IAMF #8 and EMI/EMF-IAMF #9 including that grounding and insulation of the HSR project's metal structure is a requirement of the project design.

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1358

The comment states that the Authority shall only utilize equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes. Construction will be done in accordance with applicable safety ordinances. Section 3.11.2, Laws, Regulations, and Orders of the Final EIR/EIS identifies which laws and requirements pertaining to safety that the Authority is subject to IAMF-PU&E#4 in Section 3.6.4.2 of this Final EIR/EIS, which requires the construction contractor to prepare a technical memorandum documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. This memorandum will be prepared in coordination with LADWP, and LADWP and the construction contractor would stipulate the applicable safety ordinances and statues to which all project equipment, material, and construction techniques would adhere. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1359

The comment requests that no grading be conducted within LADWP's Transmission Line Right-of-Way (TLRW) without the prior written approval of LADWP. Grading work within LADWP TLRW will be coordinated with LADWP prior to construction. Refer to IAMF-PU&E#4 in Section 3.6.4.2 of this Final EIR/EIS, which requires the construction contractor to prepare a technical memorandum documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. This memorandum will be prepared in coordination with LADWP, and LADWP and the construction contractor would stipulate that no grading be conducted within LADWP's TLRW without prior written approval. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1360

The commenter requests that no structures be built within the LADWP's TLRW without prior written approval of the LADWP. Written approval of the LADWP is not required at this level of design; however, the Authority will continue to coordinate with LADWP through final design. Written approval, if necessary, will be obtained at that time.

783-1361

The commenter states that LADWP prohibits drainage structures or the discharge of drainage onto the TLRW. HSR project drainage, in general, is designed to remain within the limits of proposed HSR right-of-way except at the proposed connection to the local storm drain system. Given the proximity of the LADWP TLRW and potential storm water discharge into the Los Angeles River, drainage solutions may reveal the need for an easement through LADWP TLRW. Areas of potential conflict will be detailed and coordinated during final design.

783-1362

The comment requests that the Authority compact all fill slopes within LADWP TLRW and states that the compaction shall comply with applicable Building Code Requirements. Fill slopes will be compacted in accordance with applicable design guidelines. Refer to IAMF-PU&E#4 in Section 3.6.4.2 of this Final EIR/EIS, which requires the construction contractor to prepare a technical memorandum documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. This memorandum will be prepared in coordination with LADWP, and LADWP and the construction contractor would stipulate that the Authority would compact all fill slopes within LADWP TLRW in compliance with applicable Building Code requirements. No revisions to the Final EIR/EIS have been made in response to this comment.

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1363

The comment states that an area at least 50 feet around the edge of each tower footing must remain open and unobstructed for necessary maintenance, including periodic washing of insulators by high-pressure water spray. The Authority will maintain the requested 50-foot unobstructed area around each LADWP tower. Refer to IAMF-PU&E#4 in Section 3.6.4.2 of this Final EIR/EIS, which requires the construction contractor to prepare a technical memorandum documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. As part of the memorandum that would be prepared in coordination with LADWP, it would be stipulated that the Authority would maintain an accessible and unobstructed access area of at least 50 feet around the edge of each tower for maintenance. Additionally, during final engineering and design and construction of the HSR Build Alternative, the Authority would work with utility owners to ensure that all affected utilities are suitably relocated or protected in place. At this time, LADWP would have the opportunity to work with the Authority to ensure that a 50-foot access buffer is maintained around its facilities. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1364

The commenter states that LADWP prohibits grading below the top of tower footing within the LADWP's TLRW, in the immediate vicinity of the towers. Proposed grading around transmission towers within LADWP's TLRW may be required to support HSR improvements with finished grading to remain at or above the top of the tower footing. Areas of potential conflict will be identified and coordinated with LADWP during final design.

783-1365

The commenter states that the Los Angeles Department of Water and Power (LADWP) may require additional conditions following review of detailed site plans, grading/drainage plans, etc. The Authority will continue to coordinate with LADWP as the project progresses. No revisions to this Final EIR/EIS have been made in response to this comment.

783-1366

The comment states that the Authority would be responsible for the maintenance of project areas and the maintenance of neat and clean conditions of the portions of the project within LADWP TLRW, including risks and liabilities associated with the proposed project. Refer to IAMF-PU&E#4 in Section 3.6.4.2 of this Final EIR/EIS, which requires the construction contractor to prepare a technical memorandum documenting how construction activities would be coordinated with service providers. As part of the memorandum that would be prepared in coordination with LADWP, all risks and liabilities of either LADWP or the Authority that would be associated with the proposed project would be discussed and incorporated. This statement is acknowledged. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1367

The commenter states that LADWP requires a permanent, unobstructed 20-foot minimum wide roadway (patrol road), accessible at all times by LADWP maintenance personnel to be provided and maintained by the Authority. A number of access roads have been provided along the proposed HSR alignment. Where the proposed HSR alignment remains within the existing rail corridor, the HSR Build Alternative does not include any improvements that would alter existing conditions within or access to LADWP TLRW. Details will be defined in during final design.

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1368

The comment states that the Authority should have at least one qualified electrical worker on-site to observe and ensure all Occupational Safety and Health Administration (OSHA) required safety protocols are followed. Construction work within LADWP TLRW will be coordinated with LADWP prior to construction. Refer to IAMF-PU&E#4 in Section 3.6.4.2 of this Final EIR/EIS, which requires the construction contractor to prepare a technical memorandum documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. This memorandum will be prepared in coordination with LADWP, and LADWP and the construction contractor would stipulate that the Authority would retain at least one qualified electrical worker on-site during all construction activities to observe and ensure that all OSHA safety protocols are followed. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1369

The comment states the following:

- LADWP prohibits the use of equipment taller than 14 feet under LADWP's TLRW and that the Authority would be responsible for compliance with all applicable standards and safety regulations while working near or under high-voltage overhead transmission lines.
- LADWP requires conductor surveys to be performed in accordance with LADWP requirements in future design phases.
- If equipment over 14 feet tall is to be used, the Authority would be required to perform and provide a Conductor Survey of the LADWP transmission lines for LADWP review.

Refer to IAMF-PU&E#4 in Section 3.6.4.2 of this Final EIR/EIS, which requires the construction contractor to prepare a technical memorandum documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. This memorandum will be prepared in coordination with LADWP, and LADWP and the construction contractor would stipulate that the Authority would use equipment that would not exceed 14 feet in height, and that the Authority would prepare a Conductor Survey of the LADWP transmission lines if equipment exceeding 14 feet in height is to be used. No revisions to the Final EIR/EIS have been made in response to this comment.

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1370

The comment states that if excavations are required, utility agencies within the proposed excavation sites shall be notified of impending work. The comment also states that the Authority shall be responsible for coordinating relocation of utilities, if any, and that the Underground Service Alert (DigAlert) shall be notified prior the commencement of excavations. As discussed on page 3.6-53 of the Draft EIR/EIS, the Authority would work with utility owners during final engineering design and construction of the HSR Build Alternative to relocate utilities or protect them in place. It is anticipated that all utilities can be relocated and modified within the construction footprint. The HSR Build Alternative would incorporate PUE-IAMF#3 (described in Section 3.6.4.2 of this Final EIR/EIS), which would require that the construction contractor notify the public within the affected service populations of planned outages through a combination of media. The HSR Build Alternative would also incorporate PUE-IAMF#4, which includes effective measures to avoid utility conflicts by entering into agreements negotiated between the Authority and the utility owners prior to construction of the HSR Build Alternative. A technical memorandum detailing the procedures for construction activities would be prepared as part of PUE-IAMF#4 in coordination with service providers. At the time this memorandum is prepared, the Authority would coordinate with LADWP regarding DigAlert notification requirements. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1371

The comment states that the Authority should notify LADWP's Transmission Construction and Maintenance Business Group no earlier than 14 days prior to the start of any grading, paving, or construction work within LADWP TLRW. Construction work within LADWP TLRW will be coordinated with LADWP prior to construction. Refer to IAMF-PU&E#4 in Section 3.6.4.2 of this Final EIR/EIS which requires the construction contractor to prepare a technical memorandum documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. This memorandum will be prepared in coordination with LADWP, and LADWP and the construction contractor would stipulate that the Authority would notify LADWP's Transmission Construction and Maintenance Business Group no earlier than 14 days prior to the start of any grading, paving, or construction work within LADWP TLRW. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1372

The comment states that this reply shall not be construed as an approval of any project. The Authority acknowledges this statement; however, this comment does not raise substantive questions about the environmental analysis contained in the Draft EIR/EIS. As such, no revisions to the Final EIR/EIS have been made in response to this comment.

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1373

The comment states that LADWP's water infrastructure may be located in close proximity to the proposed project and suggests contacting LADWP for information about the location of water infrastructure to ensure proper protection of utilities during project implementation. The comment also states that the Authority would be responsible for all utility relocations or protections necessitated by project implementation. Refer to Impact PU&E#3 in Section 3.6.6.3 of this Final EIR/EIS. The Authority would work with utility owners during final engineering design and construction of the HSR Build Alternative to relocate utilities or protect them in place. No revisions to the Final EIR/EIS have been made in response to this comment. The Authority will continue to coordinate with LADWP about the location of water infrastructure.

783-1374

This comment states that more information on a water service connection for the project can be obtained by contacting LADWP. The Authority acknowledges this statement and will continue to work with LADWP through final design and construction to establish necessary water connections. This comment does not raise substantive questions about the environmental analysis contained in the Draft EIR/EIS. As such, no revisions to the Final EIR/EIS have been made in response to this comment.

783-1375

This comment requests clarification on how the per capita water factor was used to estimate the existing water usage for the area within the HSR Build Alternative project footprint. As discussed in Appendix 3.6.B in Volume 2 of this Final EIR/EIS, water use demands were approximately based on the estimated population and per capita demands. The estimated per capita water usage rate was developed utilizing information from the LADWP Urban Water Management Plan (UWMP). The estimated LADWP service area population for 2015 was divided by the estimated water use in acre-feet to develop a per capita water usage rate. Estimated water use in acre-feet was developed from a 24-year average (1991–2014) (LADWP 2015). The per capita water usage rate was then multiplied by the total displaced population in the Burbank to Los Angeles Project Section. The methodology for the water use factor is consistent with other HSR Project sections. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1376

This comment asks why LADWP data were not used to determine existing water usage. LADWP does not maintain any standard unit demand factors for specific types of land uses; water use demands for LADWP's service area are approximated based on the estimated population and per capita demands of the City of Los Angeles. According to Appendix 3.6.B, total existing water usage rates within the area of the HSR Build Alternative project footprint range from 251.83 acre-feet/year to 267.15 acre-feet/year among the methods considered (Palmdale UWMP water usage factors vs. LADWP UWMP per capita usage). For the purpose of conservatively estimating existing water usage for a worst-case scenario, so as not to misconstrue potentially significant project impacts, the smaller Palmdale UWMP usage rate of 251.83 acre-feet/year was used. No revisions to the Final EIR/EIS have been made in response to this comment.

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1377

This comment asks how the multiplier for future water demand was determined. Refer to Table 1 of Appendix 3.6-B, California HSR Project EIR/EIS Water Usage Analysis Technical Memorandum, in Volume 2 of this Final EIR/EIS. The project's annual water usage at Los Angeles Union Station (LAUS) is based on a use factor of 5 gallons/passenger and 30 gallons/employee, and a daily use of 29,200 passengers and 120 employees. This amounts to an estimated daily volume of 149,600 gallons per day and 167.6 acre-feet/year. As identified in Table 1 of Appendix 3.6-B, the methodology for this calculation was based on the Authority's methodology used to calculate water demand for stations within the Fresno to Bakersfield Project Section. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1378

This comment asks why no construction water use is anticipated. No new or additional water use would be required for construction of the HSR Build Alternative. As shown in Table 3.6-12 of the Draft EIR/EIS, the existing water use for the HSR Build Alternative project footprint is 267.15 acre-feet (af). Maximum water construction use would be 228.29 af. This constitutes as 14 percent decrease for construction water use when compared to existing water use, as stated on page 3.6-54 of the Draft EIR/EIS. This reduction is a result of acquisition of existing land within the project footprint, which would eliminate water use associated with existing land uses during project construction. Therefore, the water use necessitated by the construction of the station platforms for the HSR Build Alternative would be offset by the reduction in water use from the acquired local land uses. No revisions to the Final EIR/EIS have been made in response to this comment.

783-1379

The comment identifies a statement from Appendix 3.6-B of the Draft EIR/EIS that determined that water supply assessments would not be necessary for the Burbank Airport Station and LAUS because the water use at these stations would be less than 250 acre-feet/year. Although initial calculations indicated that water use at both stations would be less than 250 acre-feet/year, the understanding of water use at LAUS was adapted to account for the recently approved Los Angeles County Metropolitan Transportation Authority (Metro) Link US EIR/EIS, which calculated water use and supply for LAUS, and included the HSR Build Alternative in its baseline condition. Extrapolating from the calculations of overall water use at LAUS that were provided in the Link US EIR/EIS, the HSR Build Alternative's operational water use at LAUS was re-determined to be 453 acre-feet/year by the year 2040. As such, the operational water use for the HSR Build Alternative would increase water usage for LAUS when compared to existing conditions. At the time of the circulation of the Burbank to Los Angeles Project Section Draft EIR/EIS, it had not yet been determined whether the project-generated increase in operation water demand at LAUS could be accommodated within the existing and future service capacity of LADWP. Project operation would potentially require new or expanded LADWP entitlements. Additional coordination with LADWP is necessary to confirm the sufficiency of LADWP's future available water supply to meet the increased water demand. As such, to ensure that impacts to LADWP supply are minimized, the Authority would implement PUE-MM#2, which would include a water supply analysis that describes, in detail, the minimum adequate water supply for the RSA and, specifically, LAUS during all conditions based on a more detailed project design. The operational water use for the HSR Build Alternative would decrease water usage for the proposed Burbank Airport Station area. As such, water demand at the proposed Burbank Airport Station would be met by the existing supply. To correct the inconsistency between Section 3.6 and Appendix 3.6-B, a revision to the text of page 7 of Appendix 3.6-B has been made in this Final EIR/EIS to clarify that a water supply analysis would not be prepared for the Burbank Airport Station, but one would be prepared for LAUS to analyze the minimum necessary supply to meet projected operational water demand at LAUS.

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1380

The comment states that Table 3.6-13 of the Draft EIR/EIS should be revised to accurately indicate that LADWP's projected water surplus in years 2020, 2030, and 2040 are actually MWD's water supplies. A clarifying note has been added to Table 3.6-13 to identify MWD as the supplier of LADWP's surplus water supply.

783-1381

The comment identifies a statement from Appendix 3.6-B of the Draft EIR/EIS that determined that water supply assessments would not be necessary for the Burbank Airport Station and LAUS because the water use at these stations would be less than 250 acre-feet/year. Refer to Response to Comment 783-1379, contained in this chapter.

783-1382

The comment states that applicants are encouraged to commit to water conservation measures that are beyond the current codes and ordinances and provides a web link for more information on water conservation in the City of Los Angeles. Refer to Section 3.6.2, Laws, Regulations, and Orders, for a description of the federal, state, and local laws, regulations, orders, plans, and agency jurisdiction and management guidance that are relevant to public utilities and energy resources and with which the proposed project would comply. As stated in Section 3.6.3, Consistency with Plans and Laws, in this Final EIR/EIS, the HSR Build Alternative would be consistent with all applicable plans and policies. Refer to Appendix 3.1-B, Regional and Local Policy Consistency Analysis for a complete consistency analysis of local plans and policies.

Additionally, the CAHSR 2020 Sustainability Report identifies ongoing sustainability efforts that will continue throughout project construction and operation. During project construction, the Authority requires construction contractors to follow water conservation practices and adhere to requirements of local and state water agencies. As stated in this report, the Authority compares the monthly consumption against the estimates developed as part of the environmental planning process to understand overall trends in water consumption. This would be a standard practice during the construction of the Build Alternative. The Authority has established criteria for CAHSR facilities to work toward net-zero potable water consumption through water-use reduction, recycling, capture, and storage. All CAHSR facilities would be constructed and operate according to the CalGreen Code, including the Code's mandatory and voluntary sections. This is to ensure that the operation of the system does not require significant water volumes or threaten water security for each region of the overall system.

The HSR Build Alternative would decrease water usage for the proposed Burbank Airport Station area and increase water usage for LAUS when compared to existing conditions in the project footprint within Burbank and Los Angeles. To address net additional water demand at LAUS, the Authority would prepare an updated water demand analysis in coordination with LADWP for the HSR Build Alternative that identifies the detailed water supply needs for the operation of the Burbank to Los Angeles Project Section at LAUS (refer to PUE-MM#2). Based on the results of the water demand analysis, the Authority will coordinate with LADWP to determine whether allocations for additional water supply are needed for project operation at LAUS. If

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1382

additional water supply is needed from the local groundwater or the State Water Project, the Authority shall pay LADWP its fair share of the State Water Project fees (per acre-foot of their allocations). No revisions to the Final EIR/EIS have been made in response to this comment.

783-1383

The commenter's concern regarding impacts to the San Fernando Valley Groundwater Basin is acknowledged. Refer to Section 3.8, Hydrology and Water Resources, Impact HWR#5: Temporary Impacts on Groundwater Volume, Quality, and Recharge during Construction, for discussion regarding potential impacts on the San Fernando Valley Groundwater Basin groundwater supplies. As stated in Section 3.8.6.3 of this Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) under Impact HWR #3, based on the historic groundwater levels in the City of Burbank, the below-grade sections of the project are anticipated to be above the groundwater table and construction of the tunnels would not affect groundwater quality. However, as also discussed in Section 3.8.6.3 of this Final EIR/EIS under Impact HWR #3, not enough groundwater information was available at this stage of project design to completely rule out the potential for groundwater to be encountered during tunneling. Therefore, it was conservatively assumed that groundwater would be encountered during tunnel construction. Groundwater infiltration into the tunnel which passes through construction materials will be treated and tested in accordance with regulatory requirements. Groundwater which passes over the tunnel, through improved ground that contains grout, may pick up a temporary elevation in pH prior to the grout setting (typically in hours), but is expected to be diluted by the surrounding groundwater to acceptable levels. It is anticipated that groundwater movement thru the area of improved ground will be minimal and the exposure to the groundwater regime would be isolated to the treated zones. As discussed under Impact HWR #5, per Mitigation Measure HWR-MM#1, included in Section 3.8.7, a groundwater monitoring plan would be implemented if it is determined that tunnel construction would encounter the groundwater table. Groundwater levels, flows, and quality would be monitored prior to, during, and after construction to reduce groundwater effects from construction of the below-grade sections. If tunneling activities were to increase groundwater flows, drilling would stop and methods would be re-evaluated to minimize potential impacts to surface water features and groundwater aquifers. These measures would ensure that tunnel construction would not result in groundwater flows that could result in migration of contaminated groundwater.

Any pollutants generated during project operation would be contained within the waterproof tunnel and would not impact groundwater. For these reasons, construction and operation would not affect groundwater quality at the City of Burbank drinking water supply wells along Vanowen Street. No revisions to the Final EIR/EIS have been made

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1383

in response to this comment.

783-1384

The commenter requests communication with the Upper Los Angeles River Area (ULARA) Watermaster. As described in Impact HWR #3: Temporary Impacts on Surface Water Quality during Construction of this Final EIR/EIS, BIO-MM#62 would require the California High-Speed Rail Authority (Authority) to prepare a dewatering plan prior to initiation of construction activity that occurs within open or flowing water, which will be subject to review and approval by applicable regulatory agencies. As part of this review and approval, the Authority will notify the ULARA Watermaster and the City of Los Angeles of any temporary groundwater extractions within their jurisdictions. Additionally, as discussed in Impact HWR #11: Intermittent and Continuous Permanent Impacts on Groundwater Volume, Quality, and Recharge during Operations, of this Final EIR/EIS, the HSR Build Alternative would not substantially affect groundwater supplies because demand for water that could be supplied by groundwater represents a small fraction of the total supply available.

Text was also added to Impact HWR #6: Permanent Impacts on Groundwater Volume, Quality, and Recharge during Construction, of the Final EIR/EIS to specify that the Authority will consult with the ULARA Watermaster to describe the disturbance related to the HSR Project within the ULARA watershed and then ask for terms and conditions based on the disturbance. At the time of the consultation, the Authority would present the anticipated volume of groundwater that may be extracted and a proposed dewatering plan. During the consultation, the Authority will also gather information pertaining to notification or encroachment permit conditions required by the ULARA Watermaster and any Administrative Committee representatives.

783-1385

The commenter requests that flow meters on extraction wells and extractions be reported to the Los Angeles Department of Water and Power LADWP. Text was added to Impact HWR #6: Permanent Impacts on Groundwater Volume, Quality, and Recharge during Construction of the Final EIR/EIS to specify that the Authority will consult with the ULARA Watermaster to describe the disturbance related to the HSR Project within the ULARA watershed and then ask for terms and conditions, such as the installation of flow meters on extraction wells, based on the disturbance. At the time of the consultation, the Authority would present the anticipated volume of groundwater that may be extracted and a proposed dewatering plan. During the consultation, the Authority will also gather information pertaining to notification or encroachment permit conditions required by the ULARA Watermaster and any Administrative Committee representatives. Furthermore, the Authority would comply with all applicable groundwater extraction requirements at the time of extraction.

783-1386

The commenter requests that the city be compensated for losses incurred from groundwater extraction. As described in response to comment 783-1384, contained in this chapter, the Authority will notify the ULARA Watermaster and the City of Los Angeles of any temporary groundwater extractions within their jurisdiction. Text was added to Impact HWR #6: Permanent Impacts on Groundwater Volume, Quality, and Recharge during Construction of the Final EIR/EIS to specify that the Authority will consult with the ULARA Watermaster to describe any disturbance to groundwater extractions related to the HSR Project within the ULARA watershed and then ask for terms and conditions, such as the installation of flow meters on extraction wells and compensation requirements, based on the disturbance. The Authority would comply with all applicable groundwater extraction requirements at the time of extraction.

Response to Submission 783 (Kathryn Laudeman, Los Angeles Department of Water & Power, August 3, 2020) - Continued

783-1387

The commenter's request to utilize beneficial reuse of dewatering discharge is acknowledged. As described in Section 3.8.4 of this Final EIR/EIS, HYD-IAMF#3 would require the preparation of a Construction Stormwater Pollution Prevention Plan (SWPPP), which will specify construction best management practices (BMPs) to be implemented as part of the HSR Project. Beneficial reuse of dewatering discharge will be considered as a potential BMP strategy to be included in the SWPPP.

Submission 776 (Jay Fuhrman, Los Angeles Metropolitan Transportation Authority (Metro) Regional Rail Department, July 31, 2020)

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
213.922.2000 Tel
metro.net

Metro

July 31, 2020

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

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

Dear Mr. Kelly:

The Los Angeles County Metropolitan Transportation Authority (Metro) Regional Rail department appreciates the opportunity to review and provide comments regarding the Burbank to Los Angeles Project Section Draft EIR/EIS, which was released for public review on May 29, 2020. It should be noted, Metro Regional Rail is continually working with California High Speed Rail Authority, Southern California Regional Rail Authority, the Federal Railroad Administration, LOSSAN, Amtrak and other key partners to develop a fully integrated regional rail system throughout Los Angeles County, including the Burbank to Los Angeles corridor.

Metro Regional Rail provides the following comments on behalf of LA Metro.

Additional Planning Studies

776-1246

In 2019 Metro completed two corridor planning study projects that should be added to Chapter 1 Section 1.3 (Relationship to Other Agency Plans, Policies and Programs).

The LA Metro Los Angeles-Glendale-Burbank Study was approved by the Metro Board on July 25, 2019. In that study Metro preformed capacity and design analysis to evaluate increased passenger rail service within the same study area proposed by CHSRA's Burbank to Los Angeles Project Section Draft EIR/EIS. Different operating options were developed, and operational modeling was performed, such as additional evening trains all the way to 15-minute bi-directional service on the Antelope Valley Line. The Metro Board adopted the findings of the study to implement 30-minute bi-directional service to Santa Clarita and 60-minute bi-directional service to Lancaster on the Antelope Valley Line. Since this study was approved and the findings were adopted by the LA Metro Board prior to the

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776-1246

release of the CHSRA's Burbank to Los Angeles Project Section Draft EIR/EIS, we request that it be included in Chapter 1 Section 1.3.

The Metrolink Antelope Valley Line Study was also concurrently approved by the Metro Board on July 25, 2019. This study focused on the segment of the Antelope Valley Line between Downtown Burbank and Lancaster to determine a range of frequency of service options to maximize regional accessibility to North Los Angeles County. The study recommended infrastructure and capital improvements and reached similar findings of the LA-Glendale-Burbank Study to achieve 30-minute bi-directional service to Santa Clarita and 60-minute bi-directional service to Lancaster.

The capital improvements and service scenario approved by the Metro Board included Lancaster Terminal Improvements, Canyon-Santa Clarity Siding Extension, Balboa Double Track Extension and Brighton-McGinley Double Track. The four capital projects were subsequently fully funded with additional grant funding from the 2020 Transit and Intercity Rail Capital Program (TIRCP) on April 21, 2020. Since this study was approved and the findings were adopted by the LA Metro Board prior to the release of the CHSRA's Burbank to Los Angeles Project Section Draft EIR/EIS, we request that it be included in Chapter 1 Section 1.3.

776-1247

Additional Capital Project/Brighton-to-McGinley

As a result of the Metrolink Antelope Valley Line Study, the Brighton-to-McGinley Double Track project (referenced above) is directly adjacent to and within very close proximity to the CHSRA's Burbank to Los Angeles Project Section Draft EIR/EIS. Therefore, we request that it be included in Chapter 1 Section 1.4 (Relationship to Other Transportation Projects in the Project Vicinity).

776-1248

Doran Street Vicinity

The Glendale Slide track alignment is currently reflected, starting just south of Doran Street and extending to south of Chevy Chase. The current Salem/Sperry overpass configuration doesn't have sufficient width between the columns to provide space for a total of 5 tracks. As discussed in a number of PDT meetings, providing the necessary width would result in an encroachment into San Fernando Road with the overpass columns.

CAHSR is proposing a communication tower and signal house within the Caltrans R/W, immediately north of Doran Street that could potentially be impacted by the proposed Metro active transportation/pedestrian bridge. Ongoing coordination will

2

Submission 776 (Jay Fuhrman, Los Angeles Metropolitan Transportation Authority (Metro) Regional Rail Department, July 31, 2020) - Continued

776-1248

be needed. Also note that the CAHSR proposed comm facility will require utility relocation in that area, possibly resulting in additional conflicts with Metro's projects.

Link US and Los Angeles Union Station (LAUS)

776-1249

Chapter 1: Project Purpose, Need, and Objectives

Page 1-35, Union Station Master Plan section states: "Because of the complexity of the Link US project, as well as Metro's desire to accommodate HSR service at the LAUS rail yard, Metro decided to allow the Link US and HSR projects to pursue project-level clearances separately." The Link US project is separate from the Union Station Master Plan project; therefore, this statement should be deleted or relocated out of this section.

776-1250

Chapter 2: Alternatives

Page 2-56 states: "The proposed HSR station at LAUS would include up to four HSR tracks and two 870-foot platforms (with the possibility of extending to 1,000 feet)." Based on our most recent coordination with CHSR Authority staff regarding the phased implementation of HSR services at LAUS, the proposed Platform No 2 and 3 as part of Phase B of Link US will both be designed to a maximum length of 800 feet. The current design will not accommodate further extension of the platforms to 1,000 feet.

776-1251

Page 2-56 states: "The HSR system would share passenger facilities, such as parking and pick-up/drop-off facilities, with other operators. HSR would require 1,180 parking spaces in 2029 and 2,010 spaces in 2040. This new demand may be met by existing underutilized parking supply within 0.5 mile of LAUS. This parking would be shared with other LAUS service providers and businesses."

The existing parking and pick-up/drop-off facilities at LAUS and the Metro Headquarters are near or at capacity. Please clarify if the intent is to meet a portion of the new parking demand from HSR riders at existing parking and pick-up/drop-off facilities at LAUS and/or the Metro Headquarters. Please demonstrate how the existing parking supply and pick-up/drop-off areas can meet the new demand from HSR riders in 2029 and 2040.

Section 3.2: Transportation

Page 3.2-38, description of roadways serving LAUS: The EIR reads as follows:

3

"Alameda Street—This north-south roadway borders and provides primary access to the west side of LAUS. Access to existing station short-term vehicle parking areas and the main passenger loading area is provided via this roadway at the Alameda Street/Los Angeles Street intersection."

776-1252

Please recall that the LAUS short term parking lot will be replaced with a new civic plaza as part of the LAUS Forecourt and Esplanade Improvements. The EIR should note the LAUS Forecourt and Esplanade Improvements in the EIR's Cumulative Project List.

776-1253

Page 3.2-38, description of remote parking sites: Please clarify whether HSR riders will use the three parking areas noted (El Pueblo, Chinatown, South of the US 101).

776-1254

Page 3.2-40, Los Angeles Union Station Area Traffic Volumes: Change "Los Angeles Pueblo" reference to "El Pueblo de Los Angeles Historic Cultural Monument" or "El Pueblo de Los Angeles" for short.

776-1255

Page 3.2-42, Transit & Bicycle/Pedestrian Connections, Los Angeles Union Station Area: The text that reads "...direct I-10 busway stops on Arcadia Street at the south side of the site and adjacent to US-101" refers to the El Monte Busway. Revise to clarify.

776-1256

Page 3.2-45, Pedestrian and Bicycle Access near the High-Speed Rail Station Areas, LAUS Area: CHSRA should be advised that Metro completed the Connect US Action Plan in 2015. This plan's fundamental goal is to provide pedestrians and cyclists a safe and pleasurable passage to transit between Union Station, 1st/Central Station and the adjacent historic neighborhoods. Enhancing walkability and bikeability will facilitate a second goal, connecting people who live and work in adjacent neighborhoods to one another. Several projects in this plan have been funded and are currently in design, including the Alameda Esplanade. Metro encourages CHSRA to review this plan and support opportunities to implement its recommended projects to improve active transportation access to LAUS.

776-1257

Page 3.2-73, Table 3.2-26 Los Angeles Union Station Area Signalized Intersection Level-of-Service, Horizon Year (2040) Plus Project: Is the LOS 'F' designation for Vignes/Ramirez due to the assumption that HSR riders will use Metro parking facilities? What is the anticipated daily ridership for HSR at LAUS and the mode share for HSR riders' trips to LAUS?

776-1258

Appendix 3.19A, p. 3.19-A-18, Cumulative Projects List: LAUS Forecourt and Esplanade Improvements have been slightly revised. This project will still remove

4

Submission 776 (Jay Fuhrman, Los Angeles Metropolitan Transportation Authority (Metro) Regional Rail Department, July 31, 2020) - Continued

776-1258

two travel lanes but shift all gained ROW to the east and include striping to transition north and south from the project site.

Taylor Yard Joint Development Project

Metro owns or has operating rights to approximately 76.5 acres of Taylor Yard, an approximately 17-acre portion of which has been developed under various long-term ground leases from Metro into a mixed-use neighborhood by developers McCormack Baron Salazar and LA Urban Homes. This neighborhood is located southeast of Rio de Los Angeles State Recreation Area and Kerr Road, northeast of the rail corridor, and southwest of San Fernando Road in an area where the proposed CHSRA alignment is proposed to diverge from the Metrolink/freight rail

776-1259

alignment just northwest of the Metrolink Central Maintenance Facility. Metro strongly recommends that CHSRA meet with and discuss the proposed rail improvements in the area of Taylor Yard neighborhood (including the proposed retaining wall easement, which impacts ground leased property within the neighborhood) with Metro's ground lessees (including the various Homeowner Associations representing homeowners in the neighborhood). Details regarding the proposed retaining wall easement will require further discussion and coordination with Metro, as well.

LA River Path Project

776-1260

Funded by Measure M, Metro is evaluating a new bicycle and pedestrian path along an approximately eight-mile stretch of the Los Angeles River from Elysian Valley through Downtown Los Angeles to the City of Maywood. Metro released the Notice of Preparation in October 2019 with a target operation date by 2027. The LA River Path Project should be included in the EIR's Section 3.2 (Transportation) and Section 3.15 (Parks, Recreation, and Open Space). Metro strongly recommends the CHSRA coordinate closely with the LA River Path team in terms of the design and construction timelines for both projects. More information may be found online at: https://www.metro.net/projects/lariverpath/.

Due to the HSR project's proximity to the LA River Path Project, the EIR must analyze potential effects on the LA River Path Project and identify project design features as appropriate. Critical impacts to be studied should include, without limitation, impacts of the HSR project's proposed crossings at the Main Street Bridge and at Figueroa Road/Riverside Drive and I-110. Specific impacts and recommended measures that should be studied include:

5

776-1260

Main Street Bridge Crossing: The construction of the new grade-separated bridge adjacent to the existing Main Street Bridge may impact the proposed design of the LA River Path project.

Figueroa Road Crossing: The remaining crossing at Figueroa Street/Riverside Drive and SR-110 underpass is utilized by the Southern California Regional Rail Authority (SCRRA) servicing Metrolink. Vertical clearance needs to accommodate SCRRA, High-Speed Rail, and the LA River Path project

Golden State Specific Plan

The Golden State Specific Plan (GSSP) is a planning effort led by the City of Burbank and supported by grant funding from CHSRA and Metro's Transit Oriented Development (TOD) Planning Grants Program. The Burbank HSR station area is

776-1261

within the GSSP's planning area boundary. The land use and site planning for the Burbank HSR station area should be consistent with the GSSP's proposed land use plan and promote its goals to advance transit-supportive planning. In particular, CHSRA should promote pedestrian and bicycle connectivity between the two Burbank Metrolink stations and services by other transit operators, and study opportunities to reduce the size of the Burbank HSR station's proposed parking supply to reduce automobile-orientation in design and travel demand. Constructing underground parking instead of the proposed surface parking lots would also preserve the site for future TOD opportunities.

Thank you for the opportunity to provide comment regarding the Burbank to Los Angeles Project Section Draft EIR/EIS. We look forward to continued collaboration and close partnership with the California High Speed Rail Authority to advance this critically important transportation project to Los Angeles Union Station.

Should you have any questions, please feel free to contact me via phone at 213.418.3179 or e-mail at fuhrmanj@metro.net.

Sincerely,

Jay Fuhrman
Manager, Transportation Planning
LA Metro Regional Rail Department

Cc: Jeanet Owens

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Response to Submission 776 (Jay Fuhrman, Los Angeles Metropolitan Transportation Authority (Metro) Regional Rail Department, July 31, 2020)

776-1246

The commenter requested that two Metro corridor planning projects be added to Chapter 1. Revisions to this Final EIR/EIS have been made in response to this comment. Section 1.3 was revised to include the LA Metro Los Angeles-Glendale-Burbank Study and the Metrolink Antelope Valley Line Study.

776-1247

The commenter requested that two Metro corridor planning projects be added to Chapter 1. Revisions to this Final EIR/EIS have been made in response to this comment. Section 1.4 was revised to include the Metrolink Brighton to McGinley Double Track Project.

776-1248

The commenter states that there are design issues that would result in impacts on Metro facilities in the area of Doran Street.

HSR improvements near Doran Street include shifting the existing tracks to the east of the existing rail right-of-way and introducing three additional tracks (two shared electrified tracks and a UPRR siding) for a total of five tracks within the existing corridor. The design near Doran Street to the Salem/Sperry overpass is shown in Volume 3.1 of this FEIR/S on sheets TT-D1307 to TT-D1309. The track section supports a 13-foot separation between the eastern edge of the rail right-of-way and relocated UPRR siding track, a 15-foot minimum spacing between UPRR siding and shifted non-electrified tracks, 24 feet between electrified and non-electrified tracks, 16.5 feet between two new electrified tracks, and 16.5 feet between the second electrified track and the western edge of rail right-of-way for a total of a 100-foot section. The Doran Street Grade Separation and Roadway Extension Project as proposed by Metro, which spans the 100-foot right-of-way with a roadway overpass and partially places one of its support columns inside of the eastern edge of the rail right-of-way at an overall 1-foot encroachment, maintains a 99 foot right-of-way width and a 26-foot vertical clearance satisfying existing and future rail infrastructure. The proposed column reduces the horizontal clearance to the adjacent Glendale slide to 12 feet, which also meets UPRR design criteria that require a minimum of 9 feet of spacing. Each of the support columns must include pier protection due to the less than 25-foot, 0-inch horizontal clearance to the proposed five-track condition as required by the Authority's Technical Memorandum 1.1.21 and SCRRA Grade Separation Guidelines Section 7.7.

HSR improvements near Doran Street also include a proposed signal house and communication tower at the northwest corner of Doran Street and San Fernando Road, where Metro plans to build a roadway extension/connection from San Fernando Road West to Fairmont Avenue. The HSR improvement would require the acquisition of City of Glendale-owned property in which access would be provided via the proposed roadway extension. There are no anticipated vertical or horizontal clearance issues between the proposed extension and HSR systems. Utility relocations are contingent upon identification of capable utility providers. Given the near at-grade condition of the proposed extension, there are no anticipated issues with existing utilities.

Response to Submission 776 (Jay Fuhrman, Los Angeles Metropolitan Transportation Authority (Metro) Regional Rail Department, July 31, 2020) - Continued

776-1248

However, in the case adjacent utilities are relocated as part of the Doran Street Grade Separation and Roadway Extension Project, existing conditions may change prior to HSR construction. Utility impacts will be further investigated in subsequent stages of the design process.The Authority will continue to coordinate with Metro throughout the life of the project.

776-1249

The commenter requested that language from Chapter 1 regarding Metro and the Link Union Station project be revised. Revisions to this Final EIR/EIS have been made in response to this comment. Section 1.3.5 was revised to remove the sentence referenced in the comment.

776-1250

The commenter states the HSR Build Alternative design at Los Angeles Union Station will not accommodate further extension of the platforms to 1,000 feet as part of Phase B of the LinkUS Project. The description of Los Angeles Union Station in Section 2.5.2.3 of this Final EIR/EIS has been revised to state that the platforms will be 800 feet.

776-1251

The commenter requests clarification on the proposed HSR-related parking at Los Angeles Union Station. As stated in Section 2.5.2.3 of this Final EIR/EIS, the HSR system would share passenger facilities, such as parking and pick-up/drop-off facilities, with other operators. HSR would require 1,180 parking spaces in 2029 and 2,010 spaces in 2040. Based on an inventory conducted in February 2016 of existing parking this new parking demand may be met by existing underutilized parking supply within 0.5 mile of LAUS. This approach was agreed upon between the Authority, Metro, and the City of Los Angeles. Additionally, as stated in Section 2.6.3 of this Final EIR/EIS, in light of the uncertainty regarding the need for station-area parking, this EIR/EIS conservatively identifies parking facilities based on the maximum forecast for parking demand at each station and the local conditions affecting access planning. This approach results in providing the upper range of actual needs and the maximum potential environmental impacts of that range. A Los Angeles Union Station Access &Egress Mode Share Estimates memorandum was prepared by the Authority and shared with LA Metro in May 2017 and was developed in partnership and coordination with LA Metro and the City of Los Angeles while the LAUS Master Plan was being developed. Meetings, coordination points, and review milestones that were part of this process are documented in this memo. No revisions to this Final EIR/EIS have been made in response to this comment.

Furthermore, the Authority has committed to developing a multi-modal access plan prior to design and construction at LAUS. This plan will be done in coordination with Metro and will include a parking strategy that will inform the final location, amount, and phasing of parking.

776-1252

The commenter requests that the LAUS Forecourt Project be included in the cumulative project analysis. As described in Section 3.19.6.1, the LAUS Forecourt and Esplanade Improvements Projects is already listed in Table 3.19-3, Cumulative Development Project List, as Cumulative Project #D25. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 776 (Jay Fuhrman, Los Angeles Metropolitan Transportation Authority (Metro) Regional Rail Department, July 31, 2020) - Continued

776-1253

The commenter requests clarification on the use of the remote parking areas. Section 3.2.5.2 of this Final EIR/EIS has been revised to clarify, “The area roadway network will be used by HSR riders to access remote parking sites in the following nearby areas.”

776-1254

The commenter requests that references to “Los Angeles Pueblo” be changed to “El Pueblo de Los Angeles Historic Cultural Monument” or “El Pueblo de Los Angeles.” References to the El Pueblo de Los Angeles Historic Cultural Monument have been revised per the commenter’s suggestion throughout the Final EIR/EIS.

776-1255

The commenter requests that Section 3.2.5.2 be revised to refer to the El Monte Busway instead of I-10 busway. Section 3.2.5.2 of this Final EIR/EIS has been revised to state: “These bus services primarily serve LAUS via the Patsaouras Transit Plaza at the east side of the site or via the El Monte Busway stops on Arcadia Street at the south side of the site and adjacent to US-101.”

776-1256

The commenter requests that Section 3.2.4 be revised to include the Connect US Action Plan. Section 3.2.4 of this Final EIR/EIS has been revised to include a discussion of the HSR project’s consistency with the Connect US Action Plan.

776-1257

The commenter expresses concern regarding traffic impacts related to LAUS. HSR riders at LAUS would use existing and future area parking facilities, including the public parking currently provided by the Los Angeles Metropolitan Transportation Authority (Metro) at the station site. The estimates of ridership at each HSR station within the Burbank to Los Angeles alignment are provided in Section 2.6.3 of this Final EIR/EIS, along with anticipated mode splits among transit, park and ride, pick-up/drop-off (including Uber/Lyft services), walking, and other modes. A proportion of riders will be park and ride, and those vehicle trips, along with other vehicle modes, were evaluated as part of the trip generation and RSA impact analysis. The LOS F condition at the Vignes Street/Gateway-Ramirez intersection is not due to implementation of the HSR Build Alternative as shown in Table 3.2-15, where the intersection operating at LOS F in the 2040 No Project condition. Also, page 2-41 of Chapter 2 in this Final EIR/EIS notes that this intersection operates at LOS F in the existing condition. No revisions to this Final EIR/EIS have been made in response to this comment.

776-1258

The comment states that the information on the LAUS Forecourt and Esplanade Improvements in the Draft EIR/EIS is outdated. The description of the LAUS Forecourt and Esplanade Improvements was updated in Appendix 3.19-A, Table 3.19.A-2, in this Final EIR/EIS to state that the project would remove two travel lanes, shift the right-of-way to the east, and include striping to transition north and south from the project site.

776-1259

The commenter has requested that the Authority meet with Metro to discuss the proposed rail improvements in the area of the Taylor Yard neighborhood due to potential impacts to ground leased property. The Authority will coordinate a meeting with both Metro and SCRRA to discuss the proposed rail improvements in the area of the Taylor Yard neighborhood.

Response to Submission 776 (Jay Fuhrman, Los Angeles Metropolitan Transportation Authority (Metro) Regional Rail Department, July 31, 2020) - Continued

776-1260

The commenter recommends an analysis of the potential effects on the LA River Path Project and for project design features to be identified. In addition, the commenter requests that the Authority coordinate with the LA River Path team for design and construction timing. As discussed in Section 3.15.6.1 of this Final EIR/EIS, the Los Angeles River Bike Path Planned Extension is included in the list of parks and recreational resources within the Resource Study Area. Please refer to Table 3.15-3 for a description of the Los Angeles River Bike Path Planned Extension and refer to Map ID 31 on Figure 3.15-2 for the location of this resource.

As discussed in Section 3.15.6.3 of this Final EIR/EIS, the HSR Build Alternative may require temporary construction easements on portions of the planned extension. The remaining portion of the existing Los Angeles River Bike Path and portions of the extension outside of the construction area would remain open for public use during construction. If the extension of the Los Angeles River Bike Path exists at the time of HSR construction, construction activities would temporarily interrupt connectivity and use of the bike path. However, detours would be implemented during construction, in coordination with the agency with jurisdiction over the bike path, to maintain access around the construction area. In addition to TR-IAMF#2, TR-IAMF#4, TR-IAMF#5, TR-IAMF#7, and PK-IAMF#1, which would minimize impacts related to temporary impact areas, closures, and detours, mitigation measures PR-MM#1, PR-MM#3, PR-MM#4, and PR-MM#5 would reduce potentially significant impacts to the Los Angeles River Bike Path Planned Extension to a less than significant level by ensuring access and connectivity are maintained through detours, signage, and alternative routes during construction and as a result of operation. Coordination with DPR for potential impacts on this planned resource would be required as part of PR-MM#4, which requires that the Authority consult with the official with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity. This coordination would include the proposed crossings at Main Street and Figueroa Street. No revisions to this Final EIR/EIS have been made in response to this comment.

776-1261

The commenter requests that the site planning for the Burbank Airport Station area be consistent with the Golden State Specific Plan's proposed land use plan and promote its goals to advance transit-supportive planning. The Authority will continue to work with the participants in the Golden State Specific Plan to ensure that the Burbank Airport Station and the City's plan for the station are mutually complementary. The commenter also requests construction of underground parking at the Burbank Airport Station as opposed to the surface parking proposed as part of the HSR Build Alternative. The HSR Build Alternative includes surface parking at the Burbank Airport Station as it is the most cost-efficient way to accommodate the estimated parking requirements based on the 2016 Business Plan. However, the Authority will evaluate parking needs, type, and location in more detail during final design.

Submission 863 (Christina Humphreys, Los Angeles Regional Water Quality Control Board, August 28, 2020)

Burbank - Los Angeles - RECORD #863 DETAIL

Status :	Action Pending
Record Date :	8/27/2020
Submission Date :	8/28/2020
Interest As :	Local Agency
First Name :	Christina
Last Name :	Humphreys
Attachments :	[863]_[Humphreys]_Email_[082720]_Original.pdf (1 kb)

Stakeholder Comments/Issues :

Hi,

863-1578

The Los Angeles Regional Water Quality Control Board would like to submit comments on the Draft Environmental Impact Report (DEIR) for the Burbank to Los Angeles Project Section of the High Speed Rail. However, we only just became aware of the DEIR today. Therefore, we request an extension of the public comment period to September 8, 2020 to allow time for us to prepare our comments.

Thank you,

Christina Humphreys, PE
Water Resource Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Program Unit II
320 West 4th Street, Suite 200
Los Angeles, CA 90013
(213) 576-6697

Burbank - Los Angeles - RECORD #863 DETAIL

Status :	Action Pending
Record Date :	8/27/2020
Submission Date :	8/27/2020
Interest As :	Local Agency
First Name :	Christina
Last Name :	Humphreys

Stakeholder Comments/Issues :

Hi,

The Los Angeles Regional Water Quality Control Board would like to submit comments on the Draft Environmental Impact Report (DEIR) for the Burbank to Los Angeles Project Section of the High Speed Rail. However, we only just became aware of the DEIR today. Therefore, we request an extension of the public comment period to September 8, 2020 to allow time for us to prepare our comments.

Thank you,

Christina Humphreys, PE
Water Resource Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Program Unit II
320 West 4th Street, Suite 200
Los Angeles, CA 90013
(213) 576-6697

Response to Submission 863 (Christina Humphreys, Los Angeles Regional Water Quality Control Board, August 28, 2020)

863-1578

The commenter requests an extension of the public comment period. As shown in Section 10.5.5, the LARWQCB received a Notice of Availability at the start of the public comment period. In response to agency and stakeholder requests and in consideration of limitations caused by the novel coronavirus pandemic, the Authority elected to extend the initial 45-day public review period for 15 days to July 31, 2020, and then for another 30 days to August 31, 2020. Therefore, the comment period provided was a total of 94 days, which is twice the minimum requirement, pursuant to CEQA and NEPA, of 45 days.

Submission 881 (Renee Purdy, Los Angeles Regional Water Quality Control Board, August 31, 2020)

Burbank - Los Angeles - RECORD #881 DETAIL

Status :	Action Pending
Record Date :	9/1/2020
Submission Date :	8/31/2020
Interest As :	Local Agency
First Name :	Renee
Last Name :	Purdy
Attachments :	Los Angeles Regional Water Board Comments on DEIR for High-Speed Rail 8-31-2020.pdf (322 kb)

Stakeholder Comments/Issues :

Please find the attached comment letter from the Los Angeles Regional Water Quality Control Board.

Thank you,

Christina Humphreys, PE
Water Resource Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Program Unit II
320 West 4th Street, Suite 200
Los Angeles, CA 90013
(213) 576-6697

881-1636

881-1637

California Water Boards

Gavin Newsom, Governor
Jared Blumenfeld, Secretary for Environmental Protection

Los Angeles Regional Water Quality Control Board

August 31, 2020

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

To Whom it May Concern:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of groundwater and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura counties, including the area encompassed by the Burbank to Los Angeles stretch of the California High Speed Rail (HSR). The Regional Board first became aware of the *Draft Environmental Impact Report* (DEIR) for the HSR project on August 27, 2020 and requested that the public comment period be extended to September 8, 2020 to allow time for us to thoroughly review the documents and prepare comments. We have not received word that the comment period will be extended. Therefore, the Regional Board is submitting the comments below, but we may have further comments once we have completed a more thorough review of the DEIR:

1) The *Existing Groundwater Quality* subsection of Section 3.8.5.6 acknowledges that, "a number of investigations have determined contamination of volatile organic compounds such as trichloroethylene, perchloroethylene, petroleum compounds, chloroform, nitrate, sulfate, and heavy metals. Trichloroethylene, perchloroethylene, and nitrate contamination occurs in the eastern part of the basin." However, the DEIR has not adequately evaluated and planned for these conditions, which exist adjacent to – and in some locations, extend beneath – much of the planned HSR route, including the proposed sub-grade section.

   Subsection 3.10.4.3 of *Section 3.10 Hazardous Materials and Wastes* says that, "Within the [Resource Study Area (RSA)], potentially large or highly contaminated [Potential Environmental Concerns (PEC)] sites were reviewed. These include sites on the CERCLA National Priorities List, where contamination could extend well beyond the address that was mapped and into the RSA. In this analysis, the database search results did not identify any such sites." However, it is well documented that groundwater contamination within the San Fernando Valley Superfund Area 1 extends beyond any single address. In fact, the contaminant plumes in groundwater within the San Fernando Valley Superfund Areas are known to extend well beyond the identified source sites that are within the RSA. According to plume maps published by USEPA in 2018, the PCE and TCE groundwater plumes extend beneath the stretch of rail line between approximately Fairview Street and Reese Place in Burbank. This includes the area of the planned sub-grade section of the HSR route. **The DEIR has not adequately evaluated the potential impacts to groundwater quality and human health that could result from sub-grade construction activities in this area.** The referenced contaminant plume maps can be found at the link below:

Submission 881 (Renee Purdy, Los Angeles Regional Water Quality Control Board, August 31, 2020) - Continued

881-1637

https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.scs&id=0902251&doc=Y&colid=37375&region=09&type=SC

Section 3.10.4.2 Impact Avoidance and Minimization Features states that HMW-IAMF #1 "requires completion of a Phase I Environmental Site Assessment (ESA) during the right-of-way acquisition phase to identify potential hazardous waste on parcels to be acquired, as well as appropriate testing and remediation (if necessary)" and that HMW-IAMF #4 "requires preparation of a construction management plan (CMP) addressing procedures and requirements for responding to disturbance of undocumented contaminated soil." The Impact HMW #1 item in subsection 3.10.6.3 of *Section 3.10 Hazardous Materials and Wastes* states that, "Trenching, cut-and-cover, and other ground-disturbing activities during HSR Build Alternative construction could expose undocumented soil and/or groundwater contamination. Impacts would result if construction activities inadvertently disperse contaminated material into the environment. For example, dewatering activities during construction have the potential to cause contaminated groundwater to migrate farther into the groundwater table," and cites the requirement for a spill prevention plan under State Water Resources Control Board General Permit (2009-0009 DWQ) as an adequate mitigation measure. **Given that soil and groundwater in the immediate vicinity of the planned sub-grade section of the HSR route are known to be contaminated, the EIR should include a soils management plan (SMP) instead of merely stating that potentially contaminated soils will be addressed.**[1] Indeed, due to the known contamination of the proposed rail corridor, it is possible that the Regional Board will require a more stringent permit(s) to be issued for the dewatering of this site, and/or that the dewatering activities would have to be addressed under the Regional Board's dewatering permit (see, Order No. R4-2018-0125).[2]

881-1638

881-1639

2) *Table 3.10-A-1 Potential Environmental Concerns* (PECs) lists the Lockheed Plant B-1 as a high priority PEC and states "An incident was reported in 1988. No additional information was provided." Remediation and groundwater monitoring are currently being conducted at this site under the regulatory oversight of the Regional Board's Site Cleanup Program. Additional information, reports, and data are available on the Water Board's GeoTracker page for the site, which can be found at the link below:
https://geotracker.waterboards.ca.gov/profile_report?global_id=SL603798616&mytab=esidata#esidata

[1] Indeed, Section III.E of State Water Resources Control Board General Permit 2009-0009 DWQ (Construction General Permit) anticipates the possibility of this happening, and requires not only that the soils be sampled and tested to ensure proper handling and that appropriate public safety measures are implemented, but also that the permit enrollee notify the appropriate Regional Water Board. The possibility of the need for proper sampling, testing and handling of contaminated soils is all but certain here, as the Los Angeles Regional Board is very familiar with this area and the contamination within this proposed train corridor.

https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/wqo2009_0009_dwq.pdf.

[2] This General Permit covers discharges from cleanup of contaminated sites where other project specific general permits may not be appropriate, such as groundwater impacted by metals and/or other toxic compounds. (Order No. R4-2018-0125, Part III.C.1.)

881-1639

Table 3.10-A-1 lists Lockheed-Burbank Plants A-1, B-1, B-6, and C-1 as "one of the responsible parties for the impacts to the San Fernando Valley groundwater basin resulting in the current Superfund site. Historical usage at the facility related to aircraft manufacturing and research resulted in PCE, TCE, and VOC impacts. Monitoring and remediation is reported to be in progress." Some information, reports, and data for these sites are available on GeoTracker and additional documents regarding the Burbank Operable Unit (BOU) of the San Fernando Valley Superfund Area should be requested from the USEPA. The EIR should discuss the potential impacts to groundwater quality that could occur during planned dewatering and soil excavation along the sub-grade portion of the planned route adjacent to the Lockheed Plant sites within the BOU. General information about the BOU can be found at the link below:
https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0902251#bkground

Table 3.10-A-1 lists the former Menasco Aerosystems site as a high priority PEC but does not mention that the *Upgradient Off-Site Investigation Report - Railway Right of Way Adjacent to the Former Menasco Property* dated June 29, 2016, at the link below, found that the soil and groundwater beneath the railroad right of way is contaminated with VOCs and metals including hexavalent chromium.
https://documents.geotracker.waterboards.ca.gov/esi/uploads/geo_report/6187464118/SL0611172141.PDF

881-1640

3) The *Groundwater Beneficial Uses* subsection of Section 3.8.5.6 fails to mention that there are several City of Burbank drinking water production wells along the existing rail line where the underground portion of the route is proposed. *Section 3.6 Public Utilities and Energy* mentions in subsection 3.6.6.3 that construction of the HSR would require relocation of infrastructure including water wells. However, *Table 3.6-9 High Speed Rail Build Alternative Impacts on High-Risk and Major Utilities* does not include drinking water wells and there is no further discussion of the procedures for relocating drinking water wells. The wells along the rail line in Burbank are part of the BOU Superfund remedy and have been sited to target capture and treatment of contaminated groundwater, so options for alternative locations of these wells would be limited. **The EIR should discuss how potential adverse impacts to drinking water resources and the BOU Superfund remedy will be mitigated**.

If you have any questions or would like to discuss these comments, please contact Ms. Christina Humphreys at (213) 576-6697 or christina.humphreys@waterboards.ca.gov, or Mr. Jeffrey Hu at (213) 576-6803 or jeffrey.hu@waterboards.ca.gov.

Sincerely,

R Purdy Digitally signed by R Purdy Date: 2020.08.31 14:37:16 -07'00'
Water Boards

Renee Purdy
Executive Officer

Submission 881 (Renee Purdy, Los Angeles Regional Water Quality Control Board, August 31, 2020) - Continued

cc: Bianca Handley, USEPA Region IX
Chi Diep, State Water Resources Control Board Division of Drinking Water
Richard Wilson, Burbank Water and Power
Liaht Rosenstein, Lockheed Martin
Bob Sun, Los Angeles Department of Water and Power

Response to Submission 881 (Renee Purdy, Los Angeles Regional Water Quality Control Board, August 31, 2020)

881-1636

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

The commenter also states that additional comments may be forthcoming. Since the Los Angeles Regional Water Quality Control Board (LARWQCB) is a permitting agency for the project, the Authority will coordinate with the LARWQCB as necessary if additional comments are received.

881-1637

The commenter expresses concern that, although the EIR/EIS acknowledges existing contamination in the groundwater adjacent to and beneath the proposed project, evaluation of this contamination is not adequately addressed in the EIR/EIS. Discussion in Section 3.8.6.3, Impact HWR #5: Temporary Impacts on Groundwater Volume, Quality, and Recharge during Construction does in fact explain the likelihood of encountering groundwater during construction, as well as the various options for maintaining a dry excavation, including dewatering. However, per Impact HWR #5, groundwater dewatering would lower the groundwater table in the vicinity of below-grade sections, which would pose a risk of ground settlement and mobilization of contaminant plumes from nearby groundwater cleanup sites. If groundwater dewatering is deemed infeasible during final design, measures such as chemical or jet grouting or permeation grouting may be required to prevent groundwater flow into the vicinity of below-grade sections. Groundwater contamination issues surrounding the project are discussed in the EIR/EIS and potential contamination issues have been planned for. Section 3.10.5.1 of this Final EIR/EIS has been expanded to provide additional detail regarding the project's location within the San Fernando Groundwater Basin Superfund site. In addition, a reference to Appendix 3.10-A has been included in this section and information from this appendix, including details about remediation facilities for the San Fernando Groundwater Basin Superfund site, has been added to this Final EIR/EIS where appropriate. Specifically, the discussion under Impact HMW #3 in Section 3.10.6.3 has been revised in this Final EIR/EIS to clarify the potential impacts of the HSR Build Alternative to the remedies for the San Fernando Groundwater Basin Superfund site and measures the Authority will implement so that the ongoing remediation of the site is not impeded.

Response to Submission 881 (Renee Purdy, Los Angeles Regional Water Quality Control Board, August 31, 2020) - Continued

881-1638

The commenter states that the EIR should include a soils management plan (SMP). HMW-IAMF #1 described in Section 3.10.4.2 of this Final EIR/EIS requires the completion of a Phase I Environmental Site Assessment during the right-of-way acquisition phase to identify potential hazardous waste, as well as appropriate testing and remediation, if necessary. Section 3.10.6.3 has been revised to clarify that federal and state requirements and policies, including CERCLA and the Certified Unified Hazardous Waste and Hazardous Management Regulatory Program would require ESA procedures for future development for parcels to be acquired or future development on or near a PEC site. In addition, the SMP requested in this comment would be prepared as part of the Authority's compliance with SWRCB General Permit 2009-0009 DWQ which is a required permit as noted in Chapter 2 of the EIR/EIS.

881-1639

Per the commenter's request, Section 3.10.5.1 of this Final EIR/EIS has been revised to include additional information related to the San Fernando Groundwater Basin Superfund site and any potential impacts to groundwater quality that could occur during planned dewatering and soil excavation along the subgrade portion of the planned route adjacent to the Lockheed Plant sites within the Burbank Operable Unit.
The text in Section 3.10.5.1 of this Final EIR/EIS has been revised to clarify the contamination present at the former Menasco Aerosystems site.

881-1640

The commenter states that the Draft EIR/EIS does not address drinking water production wells. Text has been added to Section 3.8.5.6 to acknowledge that several City of Burbank drinking water production wells are located where the underground portion of the route is proposed.

Although several drinking water wells are near the footprint as identified by the commenters, as discussed in Section 3.6, only two water wells would require relocations. Refer to Section 3.6, and specifically Impact PU&E#3, Conflicts with Existing Utilities, in Section 3.6.6.3 of this Final EIR/EIS for a discussion of how utility conflicts and relocations would be carried out. The Authority would consult with providers of water, including potable water, to determine the most suitable method for protecting or relocating existing utilities to minimize impacts to service. This includes the owners of the water wells identified in Table 3.6-10. Consistent with the discussion added under Impact HMW #3 in Section 3.10.6.3, the Authority will coordinate with USEPA to construct new wells prior to the removal of any existing wells to ensure that there would be no disruption to the ongoing groundwater remediation in the Burbank Operable Unit nor to the potable water provided from these wells.

Submission 672 (Will Meade, Los Angeles Unified School District, July 6, 2020)

Burbank - Los Angeles - RECORD #672 DETAIL

Status :	Action Pending
Record Date :	7/6/2020
Submission Date :	7/6/2020
Interest As :	Business and/or Organization
First Name :	Will
Last Name :	Meade

Stakeholder Comments/Issues :

672-691 Hello my name is Will Meade I work for the Los Angeles unified school district. I was hoping to obtain a copy of the noise and vibration technical report for for the Burbank to Los Angeles section. My email is William W-I-L-L-I-A-M dot Mead M-E-A-D-E AT LAUSD.net and my my cell phone number is 213-259-5865. I also have a couple of questions if possible to ask about the noise measurements that were done, for the info, maybe in the technical report but I just wanted to be sure. And I had a question to about just the overall noise amount as well. So if if someone could give me a call back I'd appreciate it. My number again is 213-259-5865. Thanks bye.

Response to Submission 672 (Will Meade, Los Angeles Unified School District, July 6, 2020)

672-691

Refer to Standard Response BLA-Response-Section 3.4 N&V-01: Noise Impacts During Operation.

The commenter requested a copy of the Noise and Vibration Technical Report. The commenter was forwarded a copy of the report on July 6, 2020 and a hard copy was also provided. Also, Mr. Meade confirmed an office hours appointment with the Authority's outreach team for July 13, 2020, at 2:00 p.m. Refer to Standard Response Comment N&V-01 for more information regarding noise impacts during operation of the HSR project. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 765 (William Meade, Los Angeles Unified School District, July 30, 2020)

Los Angeles Unified School District
Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

July 30, 2020

Submitted via electronic mail

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

PROJECT NAME: California High-Speed Rail Project – Burbank to Los Angeles Section

Presented below are comments submitted on behalf of the Los Angeles Unified School District's (Los Angeles Unified) Office of Environmental Health and Safety (OEHS) regarding the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed Burbank to Los Angeles Section of the California High-Speed Rail Project. Due to the proximity of the project to Los Angeles Unified schools, we have the following concerns about potential negative impacts on the operation of schools as well as the school communities, including students, teachers, staff, and parents.

Potential Impacts to Sotomayor Learning Academies

Sotomayor Learning Academies is adjacent to the project's proposed rail alignment.

765-1176

Noise and Vibration

Construction

OEHS concurs with the Draft EIR/EIS finding that, given the proximity of the school to the rail corridor, the project's construction noise would result in significant impacts at Sotomayor Learning Academies. However, the 80 dBA L_{eq} threshold used to determine noise impacts is significantly higher than the noise standard we use for our schools. Los Angeles Unified established maximum allowable noise levels to protect students and staff from noise impacts generated in terms of L_{eq}. These standards were established based on the California High Performance Schools (CHPS) noise standard. Our exterior noise standard is 67 dBA L_{eq} and our interior noise standard is 45 dBA L_{eq}. OEHS is concerned that if the construction noise impacts are only mitigated to 80 dBA, the noise levels on the campus will remain significantly higher than our noise standard and, therefore, potentially disruptive to the learning environment. To ensure that the mitigation measures put in place are adequate, Los Angeles Unified requests that the California High-Speed Rail Authority implement mitigation measures that will lower construction noise to our noise standards at Sotomayor Learning Academies. To bring construction noise levels down to this level, we request that the following mitigation measures be implemented:

- A temporary noise barrier capable of reducing construction noise levels on the Sotomayor Learning Academies' campus to 67 dBA L_{eq} shall be installed between the rail corridor and the school.
- Provisions shall be made to allow school administrators and/or their designated representative(s) to notify the contractor if construction noise levels are adversely impacting the learning environment. In this event, the contractor must implement additional noise attenuation measures or reschedule noise-generating activities to a time when school is not in session.

765-1177

Operation

The Draft EIR/EIS found that the increase in the number of daily trains that the project would generate would increase the peak noise level at the school from 62.1 dBA to 66.2 dBA. The Draft EIR/EIS found this increase in noise levels to be a moderate impact and did not include any mitigation to reduce this impact. However, Los Angeles Unified considers a noise level increase of 3 dBA or more over ambient noise levels to be a significant impact for existing schools and requires mitigation to achieve levels within 2 dBA of pre-project ambient level. The 4 dBA increase in the ambient noise level at Sotomayor Learning Academies that the project would result in would potentially be disruptive to the school's learning environment, both inside classrooms and in exterior areas. Therefore, we request that the following mitigation measure be implemented to ensure that operation of the project does not result in noise impacts to the school:

- A permanent sound barrier shall be installed between the rail corridor and the school capable of keeping post-project ambient noise levels at Sotomayor Learning Academies within 2 dBA of the pre-project ambient level.

765-1178

Air Quality

Construction

The Draft EIR/EIS found that construction of the project would result in localized air quality impacts on school children and other sensitive receptors due to further contributing to annual ambient concentrations of NO_2 that already exceed the California Ambient Air Quality Standards (CAAQS) in the South Coast Air Basin. OEHS understands that the project's impact avoidance and minimization features would require the use of the lowest-emitting construction equipment technology available and adopt best management practices to minimize construction-period emissions. To ensure that effective mitigation is applied to reduce construction air pollutant impacts on Sotomayor Learning Academies we ask that the following language be included as a mitigation measure for air quality impacts:

- Provisions shall be made to allow school administrators and/or their designated representative(s) to notify the contractor if construction-related air emission levels are adversely impacting the learning environment. In this event, the contractor must implement additional dust attenuation measures such as watering or using soil stabilizers or reschedule dust-generating activities to a time when school is not in session.

765-1179

Safety and Security

The increase in train traffic in the rail corridor next to Sotomayor Learning Academies would potentially increase the likelihood of a derailment that could impact the school. The Draft EIR/EIS found that if a derailment were to occur next to a school, the train would remain within the operational corridor and, therefore, the impact of hazards created by derailment near schools would be less than significant. OEHS believes this requires further study or evidence to validate this determination.

Potential Impacts to Albion Elementary School and Ann Street Elementary School

765-1180

The project's proposed Main Street Bridge is in the vicinity of Los Angeles Unified's Albion Street Elementary School (approximately 350 feet northeast of the footprint of the street reconfiguration that would result from the proposed bridge) and Ann Street Elementary School (approximately 550 feet southwest of the western end of the proposed bridge). In addition, the PUC Milagro and Excel Charter Schools, which are located near the eastern end of the proposed bridge, may be impacted by the construction and operation of the bridge.

765-1181

Air Quality, Noise, Pedestrian Safety, and Traffic

OEHS approves of the concept of grade separating the high-speed rail route and the existing tracks from streets, as this eliminates potential conflict points between the trains and pedestrians or vehicles. However, OEHS is concerned about the potential for construction and operation of the proposed Main Street Bridge

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The Office of Environmental Health and Safety is dedicated to providing a safe and healthy environment for the students and employees of the Los Angeles Unified School District.

Submission 765 (William Meade, Los Angeles Unified School District, July 30, 2020) - Continued

765-1181

grade separation to result in air quality, noise, pedestrian safety, and traffic impacts to Albion Street Elementary Schools and Ann Street Elementary Schools and the communities that these schools serve.

Construction

765-1182

As proposed, the construction of the Main Street Bridge grade separation will close roads, sidewalks, and intersections used by students and families walking and driving to Albion Elementary School and Ann Street Elementary School. Construction activities will also lead to the presence of heavy equipment and increased truck trips to haul materials on and off the project site, which can lead to safety hazards for people walking or driving in the vicinity of the construction site. In addition, construction activities also may lead to increased traffic volumes or traffic disruptions in an already congested area during school drop off and pickup times. To ensure that impacts on nearby elementary schools from the construction of the proposed Main Street Bridge are reduced to the extent feasible, OEHS asks that the following mitigation measures be required:

765-1183

- Contractors must maintain ongoing communication with Los Angeles Unified school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to schools may be impacted.
- Contractors must maintain safe and convenient pedestrian routes to Los Angeles Unified schools. Los Angeles Unified's School Pedestrian Route Maps are available at:

  http://www.lausd-oehs.org/saferoutestoschools.asp.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes are not to pass by ***any*** school, except when school is ***not*** in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards or flaggers, at the project proponent's expense, is required any time the safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing shall be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.
- Los Angeles Unified's Transportation Branch **must be contacted** at (213) 580-2900 regarding the project's potential effect upon existing school bus routes.
- The Project Manager or designee shall notify the Los Angeles Unified Transportation Branch of the expected start and ending dates for various portions of the proposed project that may affect traffic within the nearby school areas.
- School buses must have unrestricted access to Los Angeles Unified schools.
- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.
- During and after construction, changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.

765-1183

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Contractors must maintain ongoing communication with Los Angeles Unified school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.
- Parents dropping off their children must have access to the passenger loading areas.

Operation

765-1184

As currently proposed, the Main Street Bridge would result in the reconfiguration of several streets on the east bank of the LA River, including connecting Lamar Street and Gibbons Street to Albion Street via a new underpass under the Main Street Bridge. OEHS was provided with a review of the Main Street Overpass Analysis and the Draft EIR/EIS Transportation Section prepared by Gibson Transportation Consulting, Inc. It found that the connection of Lamar and Gibbons Streets to Albion Street may encourage truck and vehicular traffic to use Albion Street when going to or from the Interstate 5 (I-5) ramps at Broadway. A significant increase in industrial truck and vehicular traffic on Albion Street could result in an increase in noise, diesel and vehicular emissions, traffic, and pedestrian safety impacts at Albion Elementary School. In addition, the completion of the proposed Main Street Bridge, with its elimination of the existing at-grade railroad crossings, would likely result in the Main Street corridor becoming more attractive to drivers traveling between I-5 and Downtown Los Angeles.

A significant increase in industrial truck and vehicular traffic on Main Street could also result in an increase in noise, diesel and vehicular emissions, traffic, and pedestrian safety impacts at Ann Street Elementary School.

765-1185

Due to these potential impacts, Los Angeles Unified requests that the potential for the project to result in increased traffic adjacent to these schools and, any associated impacts, be studied in the Final EIR/EIS. In addition, Los Angeles Unified requests that other street configurations that have the potential to reduce or eliminate an increase in traffic on Albion Street be considered along with other mitigation measures, such as signalization and crosswalks, which would reduce the potential impacts associated with an increase in traffic adjacent to these schools.

765-1186

OEHS's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be either analyzed further or addressed to ensure the welfare of the students attending Los Angeles Unified schools, their teachers and the staff, as well as to assuage the concerns of the parents of the students. Therefore, the measures set forth in these comments should be adopted as conditions of project approval to offset unmitigated impacts on the students and staff at Los Angeles Unified schools.

Thank you for your attention to this matter. If you need additional information please contact me at (213) 259-5865.

Regards,

Will Meade, Environmental Planning Specialist
Office of Environmental Health & Safety

Response to Submission 765 (William Meade, Los Angeles Unified School District, July 30, 2020)

765-1176

The commenter has expressed concerns regarding the construction noise impacts to the Sotomayor Learning Academies. The applicable noise standards for construction and operation of the HSR project are described in Section 3.4.2 of the EIR/EIS and include the FRA and Federal Transit Administration (FTA) noise and vibration standards. The FRA Manual recognizes schools as sensitive receptors and provides specific construction noise level criteria for assessing potential impacts. Table 3.4-5 in Section 3.4.4.3 presents the construction noise level standards from the FRA and FTA manuals applied within this analysis. As part of N& V-MM#1, which requires the contractor to prepare a noise monitoring program for Authority approval and requires that construction noise not exceed the FRA standards, potential construction noise impacts would be less than significant under the California Environmental Quality Act (CEQA). One of the specific methods considered to mitigate noise related to construction activities is temporary barriers. Additional noise reduction methods would also be implemented to reduce construction noise impacts to the extent feasible.

Because the project is being undertaken by a state agency (the Authority), the project must conform to the policies and objectives of the statutes and regulations under which the Authority and FRA operate. Since an agency of the State of California is the project proponent, the project is not subject to local government general plan policies, zoning regulations, or standards. The state's immunity from local regulations is an extension of the concept of sovereign immunity. The Authority, as the proponent of a sovereign activity of the State is not subject to local land use regulations (see, e.g., Town of Atherton v. Superior Court [1958] 159 Cal.App.2d 417, 428,citing to Hall v. Taft [1956] 47 Cal.2d 177,183; Lawler v. City of Redding [1992] 7Cal.App.4th 778, 784.) Unless the Legislature expressly waives this immunity in a statute, which it has not done here, the general rule is that a local agency cannot regulate state activities (see Del Norte Disposal, Inc. v. Department of Corrections [1994] 26 Cal.App.4th 1009, 1013). Moreover, although CEQA requires that EIRs discuss inconsistencies with applicable plans, even then, an inconsistency by itself is not considered an environmental impact.

Nevertheless, the Authority recognizes that the project can be most successful if designed in a manner that is as sensitive as possible to the local environment through which it must travel while still meeting the unique design constraints of HSR service.

765-1176

Through meetings with local agency staff and direct discussions with individual local government officials and staff, the Authority has endeavored to develop a project design that minimizes local impacts and is made as consistent with local plans as possible.

765-1177

While the City of Los Angeles and other local jurisdictions through which the Burbank to Los Angeles Project Section of the HSR system passes have their own noise criteria and significance standards, the applicable standards appropriately used within this Final EIR/EIS are found within the FRA's High-Speed Ground Transportation Noise and Vibration Impact Assessment Manual (FRA 2012). While the FRA Manual does not incorporate a fixed noise level increase like LAUSD to determine potential noise impacts, the methodology of comparing existing noise levels to with project noise level assesses the noise level increase and accounts for different existing noise environments more appropriately. For example, an increase of 3 dBA from 52 to 55 dBA is less of an overall impact than 72 to 75 dBA. As stated in response to comment 765-1176, because the project is being under taken by a state agency (the Authority), the project must conform to the policies and objectives of the statutes and regulations under which the Authority and FRA operate. Since an agency of the State of California is the project proponent, the project is not subject to local government general plan policies, zoning regulations, or standards.

Response to Submission 765 (William Meade, Los Angeles Unified School District, July 30, 2020) - Continued

765-1178

This commenter is requesting additional provisions within a mitigation measure to allow for complaint notifications. Section 3.3.2.3 of the Draft EIR/EIS describes the rules and regulations of the South Coast Air Pollution Control District (SCAQMD) that would be applicable to the project. Rule 402, Nuisance, restricts the discharge of any contaminant in quantities that cause or have a natural ability to cause injury, damage, nuisance, or annoyance to businesses, property, or the public. Additionally, Rule 403, Fugitive Dust, requires the prevention, reduction, or mitigation of fugitive dust emissions from a project site.

The Authority and/or contract administrator would incorporate all applicable SCAQMD requirements into the contract specifications for construction contractors and subcontractors. Under AQ-IAMF#1, the project would be required to develop a construction dust plan. That plan would include the requirement to post a visible sign with the telephone number and person to contact regarding dust complaints. No revisions to this Final EIR/EIS have been made in response to this comment.

765-1179

The commenter expresses concern related to train derailment near schools. As discussed under Impact S& S #5, a basic design feature of an HSR system is containment of trainsets within the operational corridor. Additionally, the HSR Build Alternative would implement positive train control, which would help to avoid collisions with other trains that could otherwise lead to derailment. Therefore, if an HSR derailment were to occur next to a school, the train would remain within the operational corridor. Because it would operate within an existing railroad corridor, the HSR Build Alternative would not result in a substantial change from existing conditions related to safety impacts on schools. Furthermore, as noted in Section 3.11.6.3, strategies to ensure containment include operational and maintenance plan elements that would ensure high-quality tracks and vehicle maintenance to reduce the risk of derailment. In addition, physical elements, such as containment parapets, check rails, and guard rails, would be used in specific areas with a potential high risk of or high impact from derailment. These areas include elevated guideways and approaches to conventional rail and roadway crossings. No revisions have been made to this Final EIR/EIS in response to this comment.

765-1180

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

The commenter states that the proposed Main Street Grade Separation is in the vicinity of Los Angeles Unified School District's Albion Street Elementary School, Ann Street Elementary School, PUC Milagro, and Excel Charter Schools and states that these schools may be impacted by the construction and operation of the bridge.

As stated in the comment, four schools are close to the proposed construction zone and the boundary of the permanent project footprint. Albion Street Elementary School is approximately 475 feet from the nearest temporary impact limit and approximately 500feet from the nearest permanent impact limit for the HSR Build Alternative. Ann Street Elementary School is approximately 670 feet from the nearest temporary impact limit and approximately 500 feet from the nearest permanent impact limit for the HSR Build Alternative. PUC Milagro and Excel Charter Schools are approximately 50 feet from the nearest temporary impact limit and less than 400 feet from the nearest permanent impact.

Construction and operation impacts to these school facilities are accounted for throughout this Final EIR/EIS. Refer to Section 3.2.6.3, Transportation; Section 3.3.6.3, Air Quality and Global Climate Change; Section 3.4.6.3, Noise and Vibration; Section 3.10.6.3, Hazardous Materials and Wastes; and Section 3.12.6.3, Socioeconomics and Communities, for impacts related to transportation (transit, vehicle, pedestrian, and bicyclists), air quality, noise, hazards, and children's safety.

As discussed in Section 3.12.4.2, IAMFs are incorporated into the HSR Build Alternative's design to help avoid and/or minimize effects to children's health and safety. Implementation of SOCIO-IAMF#1, TR-IAMF#2, SS-IAMF#2, AQ-IAMF#1, and AQ-IAMF#2 would avoid and/or minimize effects related to temporary increases in noise and dust and effects related to visual changes from construction of the HSR Build Alternative. SOCIO-IAMF#1 would require the preparation of a construction management plan with measures to maintain access and minimize effects on community residents and businesses, including actions addressing communications, visual protection, air quality, safety controls, noise controls, and traffic controls. TR-

Response to Submission 765 (William Meade, Los Angeles Unified School District, July 30, 2020) - Continued

765-1180

IAMF#2 would require the implementation of a transportation plan to maintain traffic flow during peak travel periods and a traffic control plan to implement elements such as providing for safe pedestrian and bicycle access or detours, advising school districts of construction activities, and reducing access disruptions to residents, businesses, customers, delivery vehicles, and buses. In addition, implementation of SS-IAMF#2 would require preparation of a Safety and Security Management Plan, including a Valley Fever Action Plan, during construction of the HSR Build Alternative. AQ-IAMF#1 would require the preparation of a fugitive dust control plan identifying the minimum features to be implemented during ground-disturbing activities. AQ-IAMF#2 would limit the type of paint used during construction to those with low volatile organic compound content. N&V-IAMF#1 would require the documentation of Federal Transit Administration and FRA guidelines for minimizing noise and vibration impacts when construction occurs within 1,000 feet of sensitive receptors (e.g., schools). Implementation of HMW-IAMF#7 would require the preparation of a hazardous materials and wastes plan for hazardous materials and wastes transport, containment, and storage.

Even with implementation of these IAMFs, the disruption of circulation patterns and access, and impacts related to air quality and noise and vibration would still have impacts on children's safety. Therefore, the HSR project is required to implement mitigation to address impacts on children's health related to air quality, noise and vibration, and the routine transport and handling of hazardous or acutely hazardous materials during construction of the HSR Build Alternative. Mitigation measures N&V-MM#1, N&V-MM#2, HMW-MM#1, and AQ-MM#1, described in Section 3.12.7, would be implemented to address impacts on children's health and safety.

The HSR Build Alternative would provide new grade-separated crossings, which would remove roadway conflicts with the railroad corridor and improve safety and access for buses, bicyclists, and pedestrians, resulting in a beneficial effect related to children's health and safety.

765-1181

The commenter supports the grade separation of the HSR project, but expresses concern about the potential for the construction and operation of the proposed Main Street Grade Separation to result in air quality, noise, pedestrian safety, and traffic impacts to Albion Street Elementary School and Ann Street Elementary School and the communities these schools serve. Refer to Responses to Comments 765-1182 through 765-1186, contained in this chapter. Impacts related to air quality, noise, pedestrian safety, and traffic, including in the vicinity of Albion Street Elementary School and Ann Street Elementary School, have been considered throughout this Final EIR/EIS.

Response to Submission 765 (William Meade, Los Angeles Unified School District, July 30, 2020) - Continued

765-1182

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

The commenter states that construction of the Main Street Grade Separation would close roads, sidewalks, and intersections used by students and families walking and driving to Albion Street Elementary School and Ann Street Elementary School; would lead to the presence of heavy equipment; and would require increased truck trips to haul materials, which could lead to safety hazards in the vicinity of the construction site.

The potential for construction of the HSR Build Alternative to result in impacts on children's health and safety is evaluated in Appendix 3.12-C, Children's Health and Safety Risk Assessment. While the HSR Build Alternative would be constructed and operate primarily within an existing railroad corridor in urban areas of Burbank, Glendale, and Los Angeles, as described in Section 3.12.7, IAMFs and mitigation measures would be implemented to address impacts on children's health and safety from the HSR project. Construction impacts that could affect children's health and safety (e.g., traffic hazards, air emissions, noise and vibration, and use of hazardous materials near schools) are described in Section 3.12.6.3, Impact SOCIO #14, Temporary Impacts on Children's Health and Safety from Construction. Implementation of IAMFs would avoid and/or minimize effects related to temporary changes in access, increases in noise and dust, and visual changes.

As described, construction activities would temporarily disrupt circulation patterns in some communities and could affect school bus transportation routes and the safety of children bicycling or walking to school. Refer to Section 3.2.6.3, for information on the location and nature of temporary impacts on circulation. Although access to some neighborhoods, businesses, or community facilities would be disrupted and detoured for short periods during construction, access would remain available. Any roadway realignments would be built before the closure of the existing roadway to minimize impacts. In addition, construction activities would affect pedestrians, bicyclists, and transit because of detours, traffic delays, and increased congestion.

Construction activities, such as earthmoving, could result in fugitive dust emissions and potential exposure to cancer risks and valley fever. Refer to Section 3.3.6.3, for

765-1182

information on temporary construction emissions from fugitive dust and exhaust from construction and on-road vehicles. These emissions could have potential impacts on children near construction sites.

The construction of the HSR Build Alternative would involve transporting, using, and disposing of construction-related hazardous materials and wastes, which could potentially result in accidental spills or releases of hazardous materials and wastes, and temporary hazards to schools. Refer to Section 3.10.6.3, for information on temporary construction impacts from hazardous materials and wastes.

As discussed in Section 3.12.4.2, IAMFs are incorporated into the HSR Build Alternative's design to help avoid and/or minimize these effects. Implementation of SOCIO-IAMF#1, TR-IAMF#2, SS-IAMF#2, AQ-IAMF#1, and AQ-IAMF#2 would avoid and/or minimize effects related to temporary increases in noise and dust and effects related to visual changes from construction of the HSR Build Alternative. TR-IAMF#2 would require the implementation of a transportation plan to maintain traffic flow during peak travel periods and a traffic control plan to implement elements such as providing for safe pedestrian and bicycle access or detours, advising school districts of construction activities, and reducing access disruptions to residents, businesses, customers, delivery vehicles, and buses. SOCIO-IAMF#1 would require the preparation of a construction management plan with measures to maintain access and minimize effects on community residents and businesses, including actions addressing communications, visual protection, air quality, safety controls, noise controls, and traffic controls. In addition, implementation of SS-IAMF#2 would require preparation of a Safety and Security Management Plan, including a Valley Fever Action Plan, during construction of the HSR Build Alternative. AQ-IAMF#1 would require the preparation of a fugitive dust control plan identifying the minimum features to be implemented during ground-disturbing activities. AQ-IAMF#2 would limit the type of paint used during construction to those with low volatile organic compound content. N&V-IAMF#1 would require the documentation of Federal Transit Administration and FRA guidelines for minimizing noise and vibration impacts when construction occurs within 1,000 feet of sensitive receptors (e.g., schools). Implementation of HMW-IAMF#7 would require the preparation of a hazardous materials and wastes plan for hazardous materials and wastes transport, containment, and storage.

Response to Submission 765 (William Meade, Los Angeles Unified School District, July 30, 2020) - Continued

765-1182

Even with implementation of these IAMFs, the disruption of circulation patterns and access, and impacts related to air quality and noise and vibration would still have impacts on children's safety. Therefore, the HSR project is required to implement mitigation to address impacts on children's health related to air quality, noise and vibration, and the routine transport and handling of hazardous or acutely hazardous materials during construction of the HSR Build Alternative. Mitigation measures N&V-MM#1, N&V-MM#2, HMW-MM#1, and AQ-MM#1 AQ-MM#2, described in Section 3.12.7, would be implemented to address impacts on children's health and safety.

Additionally, Impact SOCIO#18, Permanent Impacts on Children's Health and Safety from Operations, addresses permanent impacts to children's health and safety from operation. Refer to Section 3.2, Transportation, for information on the location and nature of permanent changes to access and circulation. Out-of-direction travel distances required due to road closures would not result in long detours in this urbanized area, and the Authority would work with the local jurisdictions to provide additional access as needed. The HSR Build Alternative would be grade-separated from the existing roads, so there would be no conflict between school buses and the HSR trains. The HSR Build Alternative would provide new grade-separated crossings, which would remove roadway conflicts with the railroad corridor and improve safety and access for buses, bicyclists, and pedestrians, resulting in a beneficial effect related to children's health and safety.

765-1183

Refer to Standard Responses BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation, BLA-Response-Section 3.2 TRAN-01: Temporary Traffic Impacts.

The commenter expresses concern regarding construction traffic impacts for the Main Street bridge related to schools and recommends various mitigation measures to be included to address these concerns. The commenter states a mitigation program would be required for the Main Street overpass. Refer to Standard Responses BLA-Response-Section 3.2 TRAN-01: Temporary Traffic Impacts and BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation. Chapter 2 of this Final EIR/EIS, has been revised to include an updated design for the Main Street Grade Separation Early Action Project. The HSR Build Alternative would produce traffic control plans as part of the design package for the Main Street bridge when construction designs are completed. As discussed in Section 3.2.4.2 of this Final EIR/EIS, this will be completed as part of TR-IAMF#2, Construction Transportation Plan. TR-IAMF#2 would require the contractor to prepare a detailed CTP for minimizing the impact of construction and construction traffic on adjoining and nearby roadways while maintaining traffic flow during peak travel periods. School locations and safety will be incorporated into the CTP, including truck haul routes, for the Main Street bridge construction. TR-IAMF #2 specifically requires advance notification to local school districts of construction activities, to provide rigorously maintained traffic control at all school bus loading zones, and to provide for the safety of schoolchildren. The Authority acknowledges the specific requests of the commenter for installing/maintaining appropriate traffic controls, ongoing communication with school administrators, and parent/student access to the passenger loading areas, and will consider them in the development of the CTP.

Response to Submission 765 (William Meade, Los Angeles Unified School District, July 30, 2020) - Continued

765-1184

The commenter is concerned that traffic may use Albion Street to access I-5 and this could result in noise, diesel and vehicular emissions, traffic, and pedestrian safety impacts at Albion Elementary School. The commenter is also concerned that the Main Street Grade Separation would increase traffic on that street, which links I-5 and Downtown Los Angeles. This increase in traffic could similarly result in increased noise, diesel and vehicular emissions, traffic and pedestrian safety impacts at the Ann Street Elementary School.

Albion Street Elementary School is approximately 475 feet from the nearest temporary impact limit and approximately 500 feet from the nearest permanent impact limit for the HSR Build Alternative. Therefore, this school may experience long-term operational traffic effects under the HSR Build Alternative.

Ann Street Elementary School is approximately 670 feet from the nearest temporary impact limit and approximately 500 feet from the nearest permanent impact limit for the HSR Build Alternative. The local streets that provide access to this school, including N Main Street, are expected to be used by operations-related traffic and may be impacted by operation of the HSR system. Therefore, this school may experience long-term operational traffic effects under the HSR Build Alternative.

Refer to Response to Comment 765-1182. As described, TR-IAMF#2 would require the implementation of a construction transportation plan to maintain traffic flow during peak travel periods and a traffic control plan to implement elements such as providing for safe pedestrian and bicycle access or detours, advising school districts of construction activities, and reducing access disruptions to residents, businesses, customers, delivery vehicles, and buses.

765-1185

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

The commenter requests that street configurations that have the potential to reduce or eliminate an increase in traffic on Albion Street be considered, along with elements like signalization and crosswalks, to reduce impacts on schools. Following the circulation of the Draft EIR/EIS, input from commenters and stakeholders, and coordination with the communities in the area, the Main Street Grade Separation was revised. BLA-Response-Section 3.12 SOCIO-03: Impacts Related to the Main Street Grade Separation. More details regarding the Main Street grade separation are provided in Section 2.5.2.9 of this Final EIR/EIS. Further, trucks would be prohibited from using the new connection between Gibbons Street and Albion Street under the new Main Street Bridge. More details of the design elements, such as specifics of signalization and crosswalks, will be finalized as the level of engineering design continues to progress.

765-1186

The commenter states that the comments provided identify potential environmental impacts that must either be analyzed further or addressed to ensure the welfare of the students attending Los Angeles Unified School District schools. The commenter also states that the measures set forth in the comments should be adopted conditions of project approval. Refer to responses to comments 765-1176 to 765-1185, contained in this chapter of this Final EIR/EIS, for detailed responses to the comments provided.

Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020)

Burbank - Los Angeles - RECORD #885 DETAIL

Status :	Action Pending
Record Date :	9/1/2020
Submission Date :	8/31/2020
Interest As :	Local Agency
First Name :	Todd
Last Name :	McIntyre
Attachments :	20200831 Burbank to Los Angeles HSR Project Section Draft EIR-EIS - SCRRA Comment Letter FINAL wAttachments.pdf (4 mb)

Stakeholder Comments/Issues :

Hello,

Please find attached to this email the SCRRA Comment Letter on the Burbank to Los Angeles HSR Project Section Draft EIR-EIS.

Best,
Salima

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

Salima Mulji

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

August 31, 2020

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

RE: Burbank to Los Angeles 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 Burbank to Los Angeles Project Section of the California High-Speed Rail (HSR) Project as proposed by the California High Speed Rail Authority (CHSRA). We thank you for the opportunity to provide written comments on key issues relative to SCRRA within the project limits. We look forward to executing the Memorandum of Understanding that memorializes CHSRA's commitment to SCRRA to work together to resolve issues associated with the Burbank to Los Angeles section of the HSR project in a manner acceptable to all parties.

The Burbank to Los Angeles section of the HSR project would share rail corridor owned by Los Angeles County Metropolitan Transportation Authority (Metro) and operated and maintained by SCRRA for the provision of Metrolink commuter rail service. Amtrak also operates on these corridors as a tenant, and Union Pacific Railroad (UPRR) operates freight trains over the tracks under a shared use agreement and a freight easement overlaid on the corridor. The proposed HSR alignment shares the corridor with both the Metrolink Antelope Valley Line (AV Line) and the Metrolink Ventura County Line (VC Line). The proposed alignment also includes two Burbank Airport Stations (Burbank Airport – North along the AV Line and Burbank Airport – South along the VC Line), and stations at downtown Burbank, Glendale and Los Angeles Union Station (LAUS). Given the potential impacts of the Burbank to Los Angeles HSR Project to Metrolink operations and maintenance of the rail corridors, SCRRA believes that there are elements of this project that are still unresolved and require the development of additional detail in both project definition and mitigation of impacts to achieve satisfactory resolution.

Comments to the Burbank to Los Angeles Project Section EIR/EIS are presented in three portions of this letter. First, the critical issues needing additional coordination with SCRRA or resolution for the Final EIR/EIS are highlighted. Next, a list of detailed

Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

comments elaborates on the initial summary of critical issues. Finally, detailed comments related to the HSR designs in the EIR/EIS are provided in Attachment 1.

Critical Issues to Resolve

There are five primary issues to resolve. They are introduced here and are expounded upon in the Detailed Comments section.

885-1664

A. **Impacts to Metrolink Central Maintenance Facility (CMF) and Surrounding Communities:** The CMF and its rail and vehicular access, is highly constrained functionally and is at or over capacity today with regard to servicing, maintaining and storing Metrolink's equipment fleet. The CMF is located very near residential, park and community sites and SCRRA has gone to great lengths to balance its operational needs with community concerns. The CHSRA proposed alignments, would severely impact the overall functionality of the CMF and its critical role in supporting Metrolink operations, and potentially jeopardize the momentum SCRRA has worked hard to develop with the communities surrounding the facility. The HSR project should consider alternate alignments that eliminate or reduce the impacts to the CMF and the surrounding community. Any modifications to the CMF and its rail and vehicular access arising from the HSR alignment should be described in sufficient detail and the modifications analyzed as part of the EIS/EIR and comprehensively mitigated. SCRRA cannot accept the CHSRA-proposed limitations on CMF's functionality as CMF's operations cannot be replaced in other maintenance facilities.

885-1665

B. **Reduction in SCRRA Tracks and Track Capacity Between CMF and Los Angeles**: Metrolink cannot accept any reduction in capacity, travel time, and utility (speed) between CMF and Los Angeles Union Station. The two west bank tracks host the highest density train traffic on Metrolink's network. The two east bank tracks are frequently occupied for long periods of time by UPRR freight trains arriving and departing from the UPRR downtown LA yards and are also shared with Metrolink and Amtrak trains. The alignment proposed in EIR/EIS will severely impact the operation between CMF and Los Angeles.

885-1666

C. **Limitation on Overall Passenger and Freight Operations and Capacity Between Burbank and CMF:** The HSR plans do not adequately account for the combined Metrolink, Amtrak and UPRR operations between Burbank, CMF and LA and could unacceptably limit the capacity and utility of this corridor. Additionally, it is not apparent that the UPRR's shared use agreement and freight/utility easements were adequately considered in the design.

885-1667

D. **Compliance with Design Standards and Agreements** The project shall comply with active SCRRA design standards, required agreements, and regulations governing operations and infrastructure in the corridor.

885-1668

E. **Provision for Future Operations –** CHSRA must acknowledge the impacts of the HSR project on the ability for existing services in the corridor to grow.

Detailed Comments

The next several sections outline detailed comments elaborate on the critical issues outlined above in detail.

A. Central Maintenance Facility (CMF)

The HSR project is proposing to build two new tracks between the CMF and the Los Angeles River, consequently relocating the CMF runaround track and substantially reducing the size of the CMF shop building as well as the overall functionality of the facility and its rail and vehicular access (*Volume 3 Project Definition: Preliminary Engineering for Project Definition (PEPD) Record Set Volume 5 – General, Stations and Trackside Access*). HSR design at CMF must either avoid all negative impacts to its operations, in function, utility, or capacity and properly address surrounding community concerns or must mitigate all impacts both in the long-term permanent condition and during construction. Furthermore, any impacts to Metrolink operations caused by the HSR construction project and then post-construction operations and its mitigations that affect communities surrounding this and other maintenance facility sites (such as wheel noise and air quality) shall be similarly mitigated and included in the EIR/EIS.

885-1669

1. With the transit capacity and frequency expansion contemplated by SCRRA's Southern California Optimized Rail Expansion (SCORE) program, combined with the Link Union Station (Link US), CMF's functionality will remain critical to Metrolink's operation. Any modification that could negatively impact CMF operations, in function, utility or capacity, either during construction or in the permanent condition are unacceptable. This issue has been raised in the previous correspondence between Metro/Metrolink and CHSRA (please see "*Attachment B*" in Attachment 2). Proper mitigations at every stage of development need to be identified in order to be acceptable.

885-1670

885-1671

2. A CMF Operations Impact Mitigation Plan that addresses all impacts and all mitigations, at all stages of construction needs to be developed and adopted and approved by SCRRA as a complete package. Measures to alleviate the impacts at CMF have been proposed at other maintenance facilities such as Metrolink's Eastern Maintenance Facility (EMF) and at the future Orange County Maintenance Facility (OCMF). However, these are not identified as formal mitigation measures and no funding to complete these improvements has been identified or secured. In addition, operational analysis or modeling is needed in order to ensure the operational feasibility and movement of train consists throughout the proposed yard is feasible and will meet SCRRA's current and future operational needs. The mitigation measures need to describe required actions in significant detail and shall be environmentally cleared and funded by the CHSRA such that they are ready to be implemented when they are needed and in advance of when the impacts are experienced.
3. SCRRA is in the process of completing a CMF Modernization Study to develop a package of urgently needed projects to prepare for future operations, improve the

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885-1672

state of good repair, address community concerns and ensure environmental stewardship. As CHSRA defines the project alignment and mitigations near CMF, it must not propose elements that limit the ability for CMF operations to be improved in the short-term. If CHSRA requires modifications to SCRRA plans to make them compatible with future CHSRA needs, responsibility for designing and funding incremental needs must be articulated in a CMF Operations Mitigation Plan (described below). SCRRA cannot materially encumber or delay urgently needed investments for the possibility of an eventual HSR conflict.

885-1673

4. CHSRA states that the proposed design would not be able to accommodate wheel truing operations or progressive maintenance bays and these operations would be relocated to another Metrolink facility. No destination facility(s) or construction phasing plans are identified either in the project definition or the mitigation measures in the EIR/EIS. Expansion of wheel truing and other mechanical functions may be necessary, but they cannot be planned as replacement of functions at CMF. Proposals to move any mechanical functions from CMF to EMF or other maintenance facility will compromise system servicing and repair of the Metrolink fleet. Preservation of a centralized location for these functions is necessary.

885-1674

5. The existing main track alignment around the CMF currently creates wheel/rail noise (squealing) when negotiating the curves. SCRRA has received complaints from the surrounding community about this noise. The CHSRA project proposes to make the curvature sharper, which would increase the potential for wheel noise from negotiating through the curves. Noise mitigation for the surrounding community should be considered through this area with the proposed SCRRA main line realignment.

885-1675

6. The progressive tracks currently allow for the maintenance of between 8 to 12 cars on each track. If the design proposes to remove these tracks, an in-kind replacement at CMF is needed to ensure adequate facilities for essential planned and unscheduled maintenance activities.

B. Reduction in SCRRA Tracks / Capacity Between CMF and Los Angeles

CHSRA has proposed to take over Metrolink's two primary, and highest density tracks between LA Union Station (LAUS) and CMF – Main Tracks #3 and #4 – shifting Metrolink and Amtrak the "east bank tracks." (*Volume 3 Project Definition: PEPD Record Set Volume 1 Track*) The two east bank tracks are currently frequently used for non-revenue equipment moves between CMF and LAUS, occasionally used for revenue Metrolink and Amtrak trains and are moderately to heavily occupied by UPRR freight trains as they depart and arrive to their downtown Los Angeles Transportation Center yard and by through UPRR freight trains. In summary, there are four tracks between CMF and LA Union Station or CMF and the UPRR LA yards and the capacity and utility of these tracks cannot be reduced. Provisions for increased Metrolink, Amtrak and UPRR traffic must be considered. Three details are noted:

885-1676

885-1676

- There are currently three main tracks near CMF between CP Ormiston and CP Dayton. CAHSR's drawings only show two main tracks in the proposed condition. The third track must be added back in.
- Drawings (*Track Schematic GE-D6101)* show CHSRA constructing new tracks between CMF and LAUS. However, the report describes these as Metrolink's existing tracks. If these are not new (as is believed), please show them as solid blue (existing Amtrak/Metrolink/UPRR mainline track) and not green (new shared track)
- Access needs to be maintained between CMF and west bank tracks to LAUS.

SCRRA will not accept any reduction in capacity, speed or utility between CMF and Los Angeles Union Station and the UPRR LA yards which is provided by four tracks (two east and two west bank). CHSRA must build at least two separate new tracks in this segment in order to accommodate their needs and must preserve the current four tracks and associated capacity or equivalent for growth for the existing users of the corridor – SCRRA, Amtrak, and UPRR.

SCRRA acknowledges the feasibility of and is still supportive of the concept of a blended corridor. However, SCRRA has still not seen an operating plan or project design that it finds acceptable at the train volumes that CHSRA envisions. SCRRA looks forward to continuing to work with CHSRA on the development of such plans and is hopeful that SCRRA and CHSRA can reach a solution that is mutually agreeable to both parties as well as to other stakeholders.

C. Limitation on Overall Passenger and Freight Capacity between Burbank and CMF

SCRRA currently accommodates the material freight rights held by the UPRR through its easement for the UPRR Saugus Line on SCRRA's existing two shared tracks between Burbank and CMF. Currently, there is right-of-way to build a "third track" with passing sidings in the future. The potential tracks can accommodate the growth of both passenger and freight increases beyond what two existing tracks can carry. This is sometimes called the "third track for freight."

885-1677

CHSRA has proposed a four-track railroad between Burbank and CMF – two for Metrolink, Amtrak and freight and two for HSR service. As such, this confines both existing and future service for Metrolink, Amtrak and freight to two tracks – the "non-high speed" tracks – and would take up right-of-way reserved for capacity growth and would preclude a fifth track (or the "third track for freight") (*Volume 3 Project Definition – PEPD Record Set Volume 1 General, Track Alignment and Right-Of-Way*). No proposed solution for accommodating the growth of both Metrolink and UPRR freight rights is proposed in the EIR/EIS. This effectively transfers the burden for expanding capacity from the CHSRA to the SCRRA and UPRR. CHSRA needs to reach an agreement satisfactory to both SCRRA and UPRR regarding CHSRA improvements and operations inside UPRR's Saugus Line Freight Easement. This agreement is

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885-1677

necessary to define requirements and should be identified as a required mitigation measure for transportation impacts.

885-1678

D. Compliance with Design Standards and Agreements

SCRRA requests compliance with the most current SCRRA Design Criteria Manual. The proposed HSR designs have not been approved by SCRRA at this time, and it is possible that designs that can earn SCRRA approval may exceed the impacts currently described in this document. The current Design Criteria Manual is available at:https://metrolinktrains.com/globalassets/about/engineering/scrra_design_criteria_manual.pdf.

885-1679

1. Since Metrolink, Amtrak, UPRR, and CHSRA will share part of the corridor, and since doing so will require design approaches that do not align with the typical standards of any of these operators, a new consensus standard should be developed for the design of the shared rail corridors. The design criteria/practices/standard/plans would need to address all phases of the project development including conceptual design, environmental, right-of-way, operating patterns and allowable speeds, platform compatibility (high and low), temporary construction impacts, long term maintenance and operation, and future expansion/addition of SCRRA and UPRR Freight.

885-1680

2. Since the CHSRA is proposing changes that affect the position of tracks both within right-of-way owned by Metro and the UPRR, the CHSRA shall obtain approval through complete agreements with both entities and with SCRRA before advancing plans and designs for further project implementation. Also, since the CHSRA is proposing track speeds up to 125 mph along this section, a more rigorous maintenance regimen is required. The CHSRA should identify how SCRRA will be reimbursed or compensated to cover the additional expense of the more complex maintenance requirements.

885-1681

3. It should also be noted that the rail corridor from Burbank to LAUS is highly encumbered by longitudinal utilities (oil pipeline, numerous fiber optic, etc.) each with their own easement and transverse utilities. Any utility line relocation or associated property acquisitions and impacts should be included in the EIR/EIS.

885-1682

4. SCRRA acknowledges recent FRA regulatory decisions permit blended operations without physical or temporal separations in corridors such as the Burbank to LA trunk corridor, and thus no longer requires such separations as a general rule. Furthermore, as it seems the CHSRA's stated intent is to operate in a blended manner with Metrolink, Amtrak, and UPRR in this corridor, then CHSRA's design for added tracks should add further inter-compatibility between tracks by electrifying all tracks and by providing station platforms on all tracks

885-1683

E. Provision for Future Operations

CHSRA must acknowledge and incorporate provisions for growth in service that is planned in the corridor, especially potential new service and infrastructure (such as new stations) explored in Metro's Burbank – Glendale – Los Angeles Corridor Study and SCRRA's exploration of growth under the SCORE program. Compounding impacts should be acknowledged in the Cumulative Impacts analysis; impacts to the cost of these other projects or provision within the HSR project should be made so as not to preclude or negatively affect the implementation of these other projects or service growth.

885-1684

1. HSR design would seem to preclude the addition of future stations in this corridor. LA Metro has recently studied adding additional stations in this corridor, and there is stakeholder interest in such additions. Of particular note would be a potential station in the Glendale media district and one just north of CMF near the Rio de Los Angeles State Park and Taylor Yard.

885-1685

2. *Report Vol. 1, Chapter 2, Section 2.5.1.6*: The 2029 and 2040 projections should acknowledge the potential growth in Metrolink service associated with planning for SCORE which is in progress as of the writing of this letter.

885-1686

3. *Report Vol. 1, Chapter 2, Section 2.5.2.4*: CHSRA should clarify how the SCRRA will be compensated for high speed rail infrastructure maintenance expense. For example, the retaining walls on the Metrolink side of the corridor are required to raise both Metrolink and HSR track between Western Ave and Fairmont Ave.

885-1687

4. *Report Vol. 1, Chapter 3.2.5.5*: Section on Passenger Rail Service should also discuss the potential increase in Metrolink Service under the SCORE program.

885-1688

SCRRA will retain full control over scheduling and service levels in this corridor. The infrastructure proposed by CHSRA does not automatically confer on CHSRA the right to operate any specific level of service or schedule. The provision of high speed rail operations in this corridor would be contingent on the successful negotiation of access rights with SCRRA, Metro, and other stakeholders where relevant.

Closing

885-1689

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

In addition to comments applicable to the current environmental document, we have identified several unresolved design and right-of-way issues raised in past communications by SCRRA, Metro and UPRR. Letters that have raised these concerns are attached with this document. SCRRA intends to continue to work collaboratively

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885-1689

with the CHSRA to ensure our questions are answered and our concerns are adequately addressed for this and all subsequent phases of project development.

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)452-0455 or via e-mail at DiazR@scrra.net.

Sincerely,

Todd McIntyre
Chief Strategy Officer

Cc: Richard Clarke, LA Metro

Attachments:
1. Detailed Comments on Burbank to Los Angeles Project Segment EIR/EIS
2. Metro to CHSRA, *Comments on Preliminary Plans for the Burbank to Los Angeles to Anaheim project sections of the California High-Speed Rail (HSR) Project*, dated February 1, 2019.

METROLINK.
SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY
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metrolinktrains.com

Attachment 1 – Detailed Comments on Burbank to Los Angeles Project Segment EIR/EIS

885-1690

Detailed design comments are offered here on the alignment and other project details presented in the Burbank to Los Angeles Project Section EIR/EIS. The fact that SCRRA is offering detailed design comments does not necessarily signify approval of the alignment presented or agreement with CHSRA on corridor-wide issues. The comments presented here does not invalidate our prior statements on critical issues. Comments offered here are meant to identify the types of issues that need to be resolved.

Track Alignments

885-1691

1. *Design Plan TT-D1601*: Shoofly tracks must include a right-hand crossover, that appears to be removed at CP Katz, along with any signal equipment relocation.
2. *Report Vol. 1, Chapter 2, Section 2.5.2.2 and Design Plan TT-D1601 - D1603*: Write-up and plans should provide more details on what is required during the shoofly stage for Metrolink. (i.e. duration, typical sections, any temporary grading or retaining walls, signal and CP modifications, specific impacts to Vanowen St, impacts to businesses and residential properties along Vanowen St., etc.).
3. *Report Vol. 1, Chapter 2, Section 2.5.2.2*: The report notes that the industry wye tracks at Burbank Junction will be removed and that the existing business could be feasibly be served by trucks. It should be noted in the report that the business in question is a lumber yard. Being that it is a lumber yard, it would require a lot of trucks to make deliveries in an already highly congested area. A connection to this industry track should be maintained to avoid worsening the traffic impacts to the surrounding area. Deliveries could be made with a crossover across the HSR tracks during non-revenue hours in the late evenings.
4. *Design Plan TT-D3103*: Top left typical section does not appear to be correct. There are no retaining walls to support the HSR trench.
5. *Design Plan TT-D3103, TT-D1102 to D1104*: Plans show that Metrolink/UPRR tracks being shifted to the north towards existing Lockheed channel. Has the authority verified if the channel is now within the RR influence line (both Metrolink and UPRR requirements) and if the existing channel walls that are being protected in place are sufficient to handle RR loading?
6. *Design Plan TT-D1102, TT-D1601*: Is there adequate separation from the proposed Metrolink Shoofly track and the proposed HSR tracks around Station

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3065+00 (HSR) and 3221+00 (Metrolink) to allow the cut and cover structure to be constructed? Appears to be less than 10' from Shoofly centerline and face of cut and cover structure.

7. *Design Plan TT-D3103, TT-D1104 to D1106, CV-G1303 to G1305*:
    a. Typical section should show the large proposed RCB adjacent to the UPRR tracks.
    b. Proposed RCB on track plan appears to be shown incorrectly as is under the UPRR tracks, while the utility plans show it (slightly) further away from the UPRR track.
    c. Discussions with UPRR will need to take place to see if UPRR will allow a large RCH that close to their track.
8. *TT-D1202, TN-C1004, TN-C3006*: Track plan should accurately show all structures proposed for Metrolink tracks. Please identify limits of bridge structure for Metrolink tracks on track plan and profiles. How will Metrolink staff maintain and inspect the bridge if it is sitting on struts for the HSR trench?
9. *Design Plan TT-03105*: Top Left section, where space allows, all permanent clearances (i.e. retaining walls) to Metrolink track should be 12'-6" min per SCRRA ES 2101.
10. *Design Plan TT-D1201, TT-D1601*: Plans for Metrolink Shoofly tracks should identify impacts to the Metrolink tracks and signaling system (i.e. Impacts to crossover and signaling system at CP Katz) and how they will be returned to current conditions once the shoofly is removed. Costs should also be accounted for if not done so already.
11. *Design Plan TT-D1212, TT-D3105*: It appears that the Metrolink tracks are being elevated beneath the I-5 Freeway. The vertical clearance beneath I-5 is shown as 23.53'. Per SCRRA ES 2101, vertical clearance requirement is 24'-6".
12. *Design Plan TT-D1401, TT-D3106*: It is unclear if pier protection is being added under the Western Ave on the side with the single Metrolink track. Plans note a callout for pier protection, while typical section only shows pier protection on the HSR side. Pier protection will be required on the single Metrolink track side if columns are within 25' of the track centerline.
13. *Report Vol. 1, Chapter 2, Section 2.5.2.1, Design Plan TT-D3106*: Report Section 2.5.2.1 notes that the minimum spacing between electrified tracks and non-electrified tracks in constrained areas will be a minimum of 16.5', however, typical section shows 15.14' between HSR and Metrolink tracks beneath the Western Ave bridge. The HSR team should look at providing a minimum spacing of no less than 16.5' between HSR and Metrolink tracks.
14. *Design Plan TT-D1304*: Why is the vertical clearance over Grandview Ave 21.66' (5' higher than the standard minimum requirement)? The vertical clearance over Flower St (0.5 mile south of Grandview Ave) is 16.5'. Based on the proposed

885-1691

structure depths of Sonora and Flower, the rail profile could be lowered to save on structure cost and meet SCRRA 24'-6" vertical clearance requirement under the Fairmont Ave OH.

15. *Design Plan TT-D1407*: 24'-6" minimum vertical clearance required for Metrolink tracks beneath Fairmont Ave OH.
16. *Design Plan TT-D1316, TT-D3108*: HSR alignment through the Glendale Station should not preclude Metrolink's ability to convert the existing Glendale Station Center Platform into a standard center platform that allows for a pedestrian underpass to be built. Retaining wall supporting HSR should be set back a minimum of 30' from the existing western station track to allow for a standard 30' wide center platform and adequate clearance from the track to the face of the retaining wall.
17. *Design Plan TT-D1319, TT-D3109*: Is there enough separation between the Metrolink track and the Terry Lumber Yard tracks to allow the spur profile to climb down to existing grade while not being impacted by the mainline track section?
18. *Design Plan TT-D1513, Curve No 709 & 809:* SCRRA currently operates the majority of revenue service trains on the West Bank between LAUS and CMF. Track geometry on the West Bank allow trains to run up to 50 mph. On the East Bank, in this same stretch, maximum track speed is limited to 25 mph due to track geometry. If a majority (if not all) of all Metrolink trains are required to operate on the East Bank when HSR is in service, an equal or better alignment as the West Bank is required for the East Bank for Metrolink to maintain current and future service schedules. This includes existing track geometry to the south where no improvements are currently being planned. Importantly: this design critique in no way invalidates the previously mentioned comment about SCRRA being unable to accept any reduction in capacity or speed in this segment.
19. *Design Plan TT-D1901, Curve No 1304 & 1311 and existing coast connector track:* SCRRA currently operates the majority of revenue service trains on the West Bank between LAUS and CMF. Track geometry on the West Bank allow trains to run up to 25 mph in this area. On the East Bank, in this same stretch, maximum track speeds is limited to 15 mph due to track geometry. If a majority (if not all) of all Metrolink trains are required to operate on the East Bank when HSR is in service, an equal or better alignment as the West Bank is required for the East Bank for Metrolink to maintain current and future service schedules. This includes existing track geometry to the south where no improvements are currently being planned. Importantly: this design critique in no way invalidates the previously mentioned comment about SCRRA being unable to accept any reduction in capacity or speed in this segment.
20. *Design Plan TT-D1721*: Derails for siding tracks used for storage should be shown and walkways around them should be factored into any locations where space is limited due to proposed obstructions (i.e. retaining walls). Obstructions

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should be modified to accommodate the walkways for the derails. (typically all sidings and industry tracks)

885-1692

Utilities

1. *Report Vol. 1, Chapter 2, Section 2.5.2.8 – Table 2-14:* Missing Industry Spur to DWP facility at Station 3691+00. Has DWP been notified about planned removal of industrial spur?
2. *Design Plan UT-C1801*: *Utility #2, 54" sewer*: The City of LA is currently in the process of rehabilitating this large sewer line. It is approximately 25' deep and will require extension shoring adjacent to the existing Metrolink connection track for the rehabilitation work. Since the proposed alignment for the Metrolink track is over this sewer for a significant length and it would be the main alignment for Metrolink and Amtrak trains, the HSR project should relocate this line from out under the proposed Metrolink alignment to avoid future impacts to Metrolink and Amtrak service should the City need to repair this sewer again. Importantly: this design critique in no way invalidates the previously mentioned comment about SCRRA being unable to accept any reduction in capacity or speed in this segment.
3. *Design Plan TP-04001*: Since HSR speeds are limited to slow speeds (25 mph) at Main St, the proposed maintenance access road to the Traction Power Facility Paralleling Station should utilize a crossing over the HSR tracks on the West Bank to access the facility rather than the Metrolink/UPRR/Amtrak tracks on the East Bank, since this is specifically for HSR maintenance in a low speed section of track. Importantly: this design critique in no way invalidates the previously mentioned comment about SCRRA being unable to accept any reduction in capacity or speed in this segment.
4. *Design Plan CV-G1303*: Will the proposed Signal house foundation and conduit runs at station 96+25 conflict with the proposed shallow RCB? If so, need to adjust location of signal house (and ROW takes). Same questions with HSR interlocker equipment to the west.

885-1693

Grade Separations

1. *Design Plan ST-K1021*:
    a. Approach slab on north side of bridge is shown to conflict with roadway crossing panels on plan view and sitting on railroad tie in typical section view. Approach slab must not conflict with concrete crossing panel or track ties.
    b. The structure design must accommodate highway-rail active warning devices on the structures and associated equipment adjacent to (and possibly on) the structure, such as exit loops for the exit gate system.

885-1693

2. *Design Plan ST-K3101*: How will bridge damage from seismic activity be mitigated between the railroad and San Fernando West bridge structures, since they are very close to each other?

885-1694

Burbank Airport Station

1. *Report Vol. 1, Chapter 2, Section 2.5.2.2 and Section 2.5.2.3*: 2nd paragraph from the bottom mentions a detailed design modification for Burbank – Downtown station in Section 2.5.2.3. However, section 2.5.2.3 only talks about Burbank Airport - South Station and LAUS. No mention of Burbank – Downtown design. It is difficult to assess the impacts of a modified or relocated Burbank – Downtown Metrolink Station given the information provided.
2. *Report Vol. 1, Chapter 2, Section 2.9.5.3*: Cut and cover construction limits overlap the airport parking structure. Will a portion of the parking structure be removed for construction?
3. *Report Vol. 1, Chapter 3.2.5.5*: Section on Passenger Rail Service, 3rd paragraph notes a new Hollywood Burbank Airport Station is planned to be built by 2029. Clarify that this is the HSR station and not either Burbank Airport - North Station on the AV line or the Burbank Airport – South Station on the VC Line.
4. *Track Schematic GE-D6101*:
    a. Crossovers should be provided between new and existing tracks north of Burbank-Downtown
    b. Platforms should be provided at Burbank-Downtown and Glendale on new tracks
    c. Universal crossovers should be provided between Burbank and Glendale stations

885-1695

Roles and Responsibilities

1. *Report Vol. 1, Chapter 6.2.2*:
    a. 2nd bullet point, clarify if allowances for agreements with SCRRA are included
    b. 4th Bullet point, clarify if the cost for Buena Vista St, Victory Blvd, and Main St grade separations are included
2. *Report Vol. 1, Chapter 6.3.3*: In Table 6-3, clarify if dispatching on the Burbank to LAUS segment is to be assigned to SCRRA as per past correspondence and if the cost for dispatching is identified

885-1696

3. *Report Vol. 2. Appendix 2-C*: Section should clarify dispatching operations within the Burbank to LA segment. Specifically, the CHSRA should clarify if SCRRA will be responsible for dispatching of HSR trains within this segment and how the dispatcher will be properly compensated for dispatching requirements.

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885-1697

4. *Report Vol. 2, Appendix 3.19-A*: Table 3.19.A-1 should include SCRRA SCORE project, Burbank Speed and Safety Improvements, and CMF North End Connection and Tail Track to the list. In addition, the Metro Salem/Sperry Grade Separation project should be added to the list.

Attachment 2 - Metro to CHSRA, *Comments on Preliminary Plans for the Burbank to Los Angeles to Anaheim project sections of the California High-Speed Rail (HSR) Project*, dated February 1, 2019.

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Metro
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885-1698

February 1, 2019

Michelle Boehm
Southern California Regional Director
California High-Speed Rail Authority
355 S. Grand Avenue, Suite 2050
Los Angeles, CA 90012

Re: Comments on preliminary plans for the Burbank to Los Angeles and Los Angeles to Anaheim project sections of the California High-Speed Rail (HSR) project

Dear Michelle:

We have reviewed the California High Speed Rail Authority's (CHSRA) draft preliminary plans for the Burbank to Los Angeles and Los Angeles to Anaheim project sections. Listed below is an abbreviated summary of our comments:

885-1698

1. The Right of Way impact plan (drawing no. RW-M1504) for the Los Angeles to Anaheim project section refer to the Link Union Station (Link US) project for acquisition of the BNSF West Bank Yard north of First Street. The Link US Draft Environmental Impact Report (DEIR) and the 10% Conceptual Engineering Design drawings include a "sliver" property take, a temporary construction easement, an aerial easement from BNSF, conversion of the existing BNSF yard lead to a new shared lead for BNSF and Amtrak, and reconfiguration and replacement of theBNSF storage tracks impacted by the Link US viaduct bridge up to First Street bridge. The Link US proposed changes to the BNSF yard would NOT result in a reduction to storage capacity or impact BNSF operations. As we discussed at several Link US Coordination Team meetings with representatives from CHSRA, Southern California Regional Rail Authority (SCRRA), California State Transportation Authority (CalSTA) and Metro beginning in September 2018, the Link US project will NOT include or evaluate further acquisition of the BNSF property nor evaluating any studies that will impact BNSF operations. The CHSRA's Environmental Documents will be responsible to analyze and evaluate any impacts regarding full acquisition of the entire BNSF West Bank Yard and the required mitigations to maintain BNSF operations. In regards to the North Loop study, we discussed and agreed upon should the Link US funding partners decide to move forward with the elimination of the north loop, the alignment of the proposed Link US run-through tracks will change and any impacts to the BNSF operations will be the analyzed by CHSRA environmental document.

2. The track plan for the Burbank to Los Angeles (drawing no. TT-D1902) refer to the Link US project for modifications to existing tracks at Control Point (CP) Mission as a result of the proposed double tracking over the existing Mission Tower Bridge (also known as the "jug handle" bridge) by CHSRA. The Link US Draft EIR and the 10% Conceptual Engineering Design submittal (see Attachment A for Link US project limits and improvements near CP Mission) did not include modifications to CP Mission to accommodate the proposed double-tracking over the Mission Tower Bridge. Changes to the current Link US plans including a supplemental DEIR, if required, must be agreed to by the Link US funding partners and will be at the cost and responsibility of CHSRA.

3. The track plans for the Burbank to Los Angeles project section (drawing no. TT-D1331 to TT-D1335) show that SCRRA mainline tracks and operations between State Route 110 and Los Angeles Union Station (LAUS) would be relocated from the West Bank to the East Bank of the Los Angeles River and SCRRA would share the passenger rail operations with Union Pacific Railroad (UPRR) freight operations on the East Bank. Metro, in a joint letter with SCRRA to CHSRA dated October 5, 2016 (see Attachment B for the letter), provided our initial concerns and request for more information regarding the proposed relocation. Further discussions among CHSRA, SCRRA and Metro are required on the proposed relocation of Metrolink to the East Bank.

4. The track plans for the Burbank to Los Angeles section (drawing no. TE-D1307 to TE-D1309) show four main tracks and one siding track in the vicinity of the proposed Salem/Sperry Overpass for the Doran Street and Broadway/Brazil Grade Separation Project. This configuration would directly impact the column locations for the proposed Overpass. The proposed design for the Doran Street and Broadway/Brazil Grade Separation Project has been approved by the Metro Board, City of Los Angeles and City of Glendale, and therefore any significant design changes are subject to approval by the Metro Board, the Cities and would require additional public outreach. This design change to the proposed Salem/Sperry Overpass would result in $1.215 million in additional design and construction costs, at the sole responsibility of CHSRA should CHSRA decides to move forward with the proposed five-track configuration.

5. The track plan for the Los Angeles to Anaheim section (drawing no. TT-D1570) shows a minimum vertical clearance of 26'-0" from the proposed Rosecrans/Marquardt Grade Separation structure over the BNSF tracks. The 65% design plans for the grade separation, approved by Metro and CHSRA, provide a minimum vertical clearance of 24'-0" over the BNSF tracks. The Rosecrans/Marquardt Grade Separation is currently working on 90% engineering design plans. Per the Project Management Funding Agreement executed on May 1, 2018, any design changes that results in additional costs will be at the sole responsibility of CHSRA.

Attachments C and D include other comments on the preliminary plans and other technical documents for the Burbank to Los Angeles and Los Angeles to Anaheim project section, respectively. To ensure consistency between your plans and current and future Metro rail projects, Metro Regional Rail has provided a copy of these plans for review and comment and we will provide any additional comments Metro Countywide Planning separately.We look forward to our continued coordination with CHSRA regarding the Burbank to Los Angeles and Los Angeles to Anaheim project sections of the California HSR project.

Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

Sincerely,

Jeanet Owens, P.E.
Senior Executive Officer
Program Management/Regional Rail
Metro

Cc: Justin Fornelli and Liz Lun, SCRRA

Attachments:
A – Link US Project Limits near CP Mission
B – Letter to CHSRA from Metro and SCRRA dated October 5, 2016
C – Metro Regional Rail Comments on the preliminary plans for the Burbank to Los Angeles project section
D – Metro Regional Rail Comments on the preliminary plans for the Los Angeles to Anaheim project section

Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

Response to Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020)

885-1664

The commenter states that the HSR Build Alternative would severely impact the overall functionality of the CMF and its critical role in supporting Metrolink operations, and potentially jeopardize the momentum SCRRA has worked hard to develop with the communities surrounding the facility. The HSR Build Alternative design at the CMF has been refined to reconfigure the various yard and maintenance facilities within the CMF to accommodate HSR with no loss of CMF functionality. Details regarding how the HSR Build Alternative would reconfigure the CMF are provided in Section 2.5.2.2. Additionally, text has been added to Section 3.4, Impacts #4 and #5 to describe potential changes in noise and vibration near the Taylor Yard community; the changes in the freight tracks would not result in severe noise or vibration impacts.

885-1665

The commenter states that Metrolink cannot accept any reduction in capacity, travel time, and utility (speed) between CMF and Los Angeles Union Station. The Authority has completed operational modeling that shows the proposed design would not cause a reduction in capacity, travel time, or speeds. Throughout most of the project section (between Alameda Avenue and SR 110), two new electrified tracks would be placed along the west side of the existing railroad right-of-way; the two new electrified tracks would be usable for HSR and other passenger rail operators. The additional capacity of the new electrified tracks, combined with the capacity of the two existing non-electrified tracks, will be sufficient to accommodate the rail traffic volumes specified in Table 2-7 of this EIR/EIS. Throughout the project section, signaling system improvements will allow trains to operate at higher frequencies, thereby accommodating all train operators in the shared corridor with no reductions in capacity, travel time, or speeds. Prior to the start of high-speed rail operations between Burbank and Los Angeles, the Authority will work with other operators in the rail corridor to establish necessary shared use agreements pertaining to operating slots and timetables, train control and communications, maintenance of equipment and infrastructure, station and train cleaning, and emergency response.

885-1666

The commenter states that the HSR Build Alternative does not adequately account for the combined Metrolink, Amtrak and UPRR operations between Burbank, the CMF, and Los Angeles, and could unacceptably limit the capacity and utility of this corridor. Additionally, the commenter states that it is not apparent that the UPRR's shared use agreement and freight/utility easements were adequately considered in the design. Refer to Response to Comment 885-1665 in this Chapter of the Final EIR/EIS regarding the HSR Build Alternative's effects to rail operators in the corridor.

885-1667

The commenter states that the HSR project shall comply with active SCRRA design standards, required agreements, and regulations governing operations and infrastructure in the corridor. The HSR Build Alternative complies with SCRRA design standards, required agreements, and operational and infrastructure regulations to the best extent possible at this stage of design. The Authority will continue to work with SCRRA through subsequent design stages to ensure that the final design for the project meets the needs of all operators in the corridor.

885-1668

The commenter states that the EIR/EIS must acknowledge the impacts of the HSR project on the ability for existing services in the corridor to grow. The HSR Build Alternative and No Project Alternative are based on growth assumptions provided in Table 2-7 of this EIR/EIS. The Authority has completed operational modeling that shows the proposed design would not cause a reduction in capacity, travel time, or speeds. Additionally, the project would not preclude future growth in the corridor.

885-1669

The commenter states that the HSR Build Alternative must either avoid all negative impacts on the CMF's operations, in function, utility, or capacity and properly address surrounding community concerns or must mitigate all impacts both in the long-term permanent condition and during construction. Please see the responses to comments 885-1670 through 885-1675 in this chapter of the Final EIR/EIS for detailed responses to the commenter's concerns.

Response to Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

885-1670

The commenter states that any modification that could negatively impact CMF operations, in function, utility, or capacity, either during construction or in the permanent condition are unacceptable and that proper mitigations at every stage of development need to be identified in order to be acceptable. The HSR project would not negatively impact CMF operations. The design has been revised to maintain all functions, and is described in Section 2.5.2.8 of this Final EIR/EIS. The HSR Build Alternative includes new mainline-to-yard track connections, partial demolition and reconstruction of the existing maintenance shop, a revised roadway network with reconfigured parking areas, and track relocations. Additionally, several facilities would need to be relocated within the CMF, including a progressive maintenance and wheel trueing facility, a train-washing/reclamation building, a yard pump house, and two service and inspection tracks. Utilities would also need to be relocated within the CMF, including domestic and fire water, storm drain facilities including underdrains and reconstructed catch basins, power facilities including emergency generator and electric substation, hazardous materials storage, fueling facilities and storage tanks, oil and water separator, and sanitary sewer systems. The construction work at the CMF would be phased to minimize the disruption to existing operations and to maintain the key operational facilities.

885-1671

The commenter requests that the Authority develop and implement a Central Maintenance Facility (CMF) Operations Impact Mitigation Plan to address all impacts and all mitigations, at all stages of construction. The design has been updated to maintain all functions at the CMF, and no functions would need to be relocated to other SCRRA maintenance facilities. The Authority will enter into an agreement with SCRRA that defines future construction and operation in the corridor.

885-1672

The commenter states that the Authority must not propose elements that limit the ability for CMF operations to be improved in the short-term and that responsibility for designing and funding incremental needs must be articulated in a CMF Operations Mitigation Plan. The design has been updated to maintain all functions at the CMF, and no functions would need to be relocated to other SCRRA maintenance facilities. The Authority will enter into an agreement with SCRRA that defines future construction and operation in the corridor.

885-1673

The commenter states that proposals to move any mechanical functions from CMF to the EMF or other maintenance facility will compromise system servicing and repair of the Metrolink fleet and that preservation of a centralized location for these functions is necessary. The functionality of the CMF is generally preserved through construction phasing efforts in order to maintain the operation of a given facility or amenity until a replacement is constructed/provided. Construction sequencing is shown in Volume 3.6 (Construction Phasing Plans) of this Final EIR/EIS. The design has been updated to maintain all functions at the CMF, and no functions would need to be relocated to other SCRRA maintenance facilities.

885-1674

The commenter has expressed concerns over the potential squealing associated with train noise around curves. As required by mitigation measures N&VMM#5 and N&V #6, a specific technical report shall be completed during final design to ensure that the track design would not create any additional noise such as wheel squeal. Text has been added to Section 3.4, Impacts #4 and #5 to describe potential changes in noise and vibration near the Taylor Yard community; the changes in the freight tracks would not result in severe noise or vibration impacts.

Response to Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

885-1675

The commenter states that the removal of the progressive tracks must be replaced in-kind at the CMF to ensure adequate facilities for essential planned and unscheduled maintenance activities. Provisions for progressive tracks within the CMF will require additional coordination with SCRRA to gain understanding of functionality in relation to other yard infrastructure. Currently, the progressive tracks, including wheel trueing operation, are being relocated directly east of its existing location as part of the CMF yard reconfiguration. The Authority will coordinate with SCRRA throughout the design of the project.

885-1676

The commenter states that the capacity and utility of the four tracks between the CMF and LAUS or the CMF and UPRR Los Angeles yards cannot be reduced and that provisions for increased Metrolink, Amtrak, and UPRR traffic must be considered. The HSR Build Alternative proposes to electrify the two tracks on the West Bank of the Los Angeles River between the CMF and LAUS, and to operate its services over these two tracks. Additionally, all four tracks in the corridor from south of the Burbank Downtown Metrolink Station (near Alameda Street) to Los Angeles Union will be accessible to passenger rail operators. All tracks will be equipped with a signal system providing higher capacity than currently, and the western two tracks will be electrified.

The commenter also states that there are currently three main tracks near the CMF between Control Point Ormiston and Control Point Dayton, and that the design in Volume 3 of the Draft EIR/EIS only shows two main tracks in the proposed condition. The project design includes four tracks in this portion of the corridor (two west of the CMF, two east of the CMF) instead of the three current tracks, and using the blended operations concept described above this will provide more capacity through the area than the existing conditions. Additionally, the design at CMF has been revised to add a crossover at the south end of the CMF, providing rail connectivity from the west bank into the yard. Finally, the commenter states that it has not seen an operating plan that it finds acceptable at the train volumes that the Authority has assumed. The Authority has completed operational modeling that shows the proposed design would not cause a reduction in capacity, travel time, or speeds. The Authority is continuing to work with all rail operators in the corridor to ensure that the blended corridor concept mentioned meets their current and future needs.

885-1677

The commenter states that no proposed solution for accommodating the growth of both Metrolink and UPRR freight rights is proposed in the EIR/EIS. Refer to Response to Comment 885-1665 in this Chapter of the Final EIR/EIS regarding the HSR Build Alternative's effects to rail operators in the corridor.

885-1678

The commenter requests compliance with the most current SCRRA Design Criteria Manual. The HSR Build Alternative complies with SCRRA design standards, required agreements, and operational and infrastructure regulations to the best extent possible at this stage of design.

885-1679

The commenter states that a new consensus standard should be developed for the design of the shared rail corridors. The Authority is committed to working with SCRRA and the other operators in the corridor throughout all phases of the project to ensure that there are no conflicts during design, construction, and operations. The Authority will enter into an MOU with SCRRA detailing roles and responsibilities for future work that is to be completed.

885-1680

The commenter states that the Authority shall obtain approval through complete agreements with both entities and with SCRRA before advancing plans and designs for further project implementation. The Authority will enter into an MOU with SCRRA, UPRR, and LACMTA detailing roles and responsibilities for future work that is to be completed. While the tunnel of the portion of the alignment is designed for speeds up to 125 mph, HSR trains would operate at similar speeds as existing passenger rail trains throughout the rest of the corridor where there would be blended operations.

Response to Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

885-1681

The comment states that the rail corridor from Burbank to LAUS is highly encumbered by longitudinal utilities, utility easements, and transverse utilities, and requests that each relocation, property acquisition, and impact be addressed in the EIR/EIS. The RSA for public utilities and energy includes direct and indirect effects on utility facilities, resources provided by utilities, and energy sources. All utility infrastructure located within the geographic boundaries of the project footprint are considered part of the RSA and inherently incorporated into the discussion and analysis of impacted utilities, infrastructure, and providers. Impacts to existing utilities in the RSA, which includes longitudinal utilities, utility easements, and transverse utilities along the existing rail corridor, are discussed in Section 3.6.6.3 of this Final EIR/EIS, specifically in Impact PU&E#1, Temporary Interruption of Utility Service, and Impact PU&E#2, Accidents and Disruption of Services. As discussed in Impact PU&E#1, design characteristics of the HSR Build Alternative would include effective measures PUE-IAMF#3 and PUE-IAMF#4 to minimize temporary interruption of utility service. PUE-IAMF#3 would require the construction contractor to notify the public of any planned outages through a combination of media. PUE-IAMF#4 would require that the construction contractor to prepare a technical memorandum prior to project construction documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. The Authority would coordinate with all utility providers whose facilities would be impacted by the proposed project to ensure that all feasible actions that avoid or minimize disruption to existing utility infrastructure and service levels are incorporated into the project's final design. As discussed in impact PU&E#2, the potential for accidental disruption of utility systems during project operation is low due to the established practices of utility identification and notification. For these reasons, Section 3.6 of this Final EIR/EIS sufficiently addresses the extent of potential utility conflicts within the RSA, acknowledges the potential for disruptions, and provides design features that would adequately minimize impacts associated with utility relocations and property acquisitions. As such, no revisions to the Final EIR/EIS have been made in response to this comment.

885-1682

The commenter states that the Authority's design for added tracks should add further inter-compatibility between tracks by electrifying all tracks and by providing station platforms on all tracks. The project does not propose to blend high-speed rail operations with freight rail operations. In the 4-track section, the project plans to electrify only the two western tracks, leaving the eastern tracks without electrification to more easily accommodate freight operations. The electrified tracks will be able to accommodate diesel powered passenger trains as well as electrified trains. The project will not preclude the future electrification of the eastern tracks by others if necessary.

High-speed rail service would not serve stations between Burbank Airport and Los Angeles Union Station, so it is not necessary to have high-speed rail platforms at intermediate stations.

885-1683

The commenter states that the Authority must acknowledge and incorporate provisions for growth in service that is planned in the corridor, especially potential new service and infrastructure (such as new stations) explored in Metro's Burbank –Glendale –Los Angeles Corridor Study and SCRRA's exploration of growth under the SCORE program. As discussed in Section 3.1.3.5, the existing conditions baseline year used for analysis is generally 2015. The SCORE program was under initial development stages when the environmental documentation for the Burbank to Los Angeles project section began, and therefore wasn't included as a part of baseline conditions. The projected train volumes as a result of the totality of the SCORE program improvements are still under development and only portions of the program are funded and underway. Section 2.5.1.6, Table 2-7 includes the assumptions for existing and future train volumes within the Burbank to Los Angeles corridor. The additional capacity of the new electrified tracks under the HSR Build Alternative, combined with the capacity of the two existing non-electrified tracks, will be sufficient to accommodate the rail traffic volumes specified in Table 2-7 of the EIR/EIS. Relevant SCORE program projects that are within the cumulative study area have been added to Section 3.19, Cumulative Impacts of this Final EIR/EIS.

Response to Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

885-1684

The commenter states that the HSR Build Alternative would seem to preclude the addition of future stations in this corridor. The Authority has analyzed the HSR Build Alternative's impacts on adjacent properties as well as reasonably foreseeable projects. The Authority does not consider these future stations reasonably foreseeable at this time, as there is not funding or environmental clearance for them currently identified. If additional stations in the corridor do advance towards implementation, the Authority will work with SCRRA to determine how they can best be accommodated with the high-speed rail design.

885-1685

The commenter notes that the Metrolink SCORE program is not included. As discussed in Section 3.1.3.5, the existing conditions baseline year used for analysis is generally 2015. The SCORE program was under initial development stages when the environmental documentation for the Burbank to Los Angeles project section began, and therefore wasn't included as a part of baseline conditions. The projected train volumes as a result of the totality of the SCORE program improvements are still under development and only portions of the program are funded and underway. Section 2.5.1.6, Table 2-7 includes the assumptions for existing and future train volumes within the Burbank to Los Angeles corridor. The basis for the Metrolink train volumes is the 2016 Metrolink 10-Year Strategic Plan Implementation Plan, "Growth Scenario 2". No revisions to this Final EIR/EIS have been made in response to this comment.

885-1686

The commenter requested clarification on whether SCRRA would be compensated for maintenance expenses of HSR infrastructure. The Authority will enter into a maintenance agreement with the owner of the corridor prior to construction. The maintenance agreement will set forth the responsibilities of all parties.

885-1687

The commenter requests that a discussion of the SCORE program be included in Section 3.2. The SCORE program was under initial development stages when the transportation analysis and environmental documentation were being compiled. The SCRRA and SCAG published the SCORE technical report in 2019. It is noted that this is now an approved expansion plan for the Metrolink system. However, the projected train volumes as a result of the totality of the SCORE program improvements are still under development and only portions of the program are funded and underway. Section 3.2.3 has been revised in this Final EIR/EIS to acknowledge the SCORE program and that the HSR project would be consistent with it.

885-1688

This comment states the Southern California Regional Rail Authority (SCRRA) will retain full control over scheduling and service levels in the corridor and provision of HSR operations is contingent on negotiations of access rights among SCRRA, Metro, and stakeholders. The Authority acknowledges that SCRRA will maintain control of their operating rights. The Authority will coordinate with SCRRA on future HSR train service within the shared railroad corridor. Table 2-21, Anticipated Environmental Reviews, Permits, and Approvals, in Chapter 2 of this Final EIR/EIS has been revised to include SCRRA as a Regional Agency with the role of approval of construction at Metrolink CMF.

885-1689

This comment is a closing statement that provides a summary of the comments provided. Refer to responses to Comments 885-1664 through 885-1688, contained in this chapter of this Final EIR/EIS, for detailed responses to those comments. The Authority pledges to continue to coordinate with the Southern California Regional Rail Authority (SCRRA) as the project continues through final design and construction and to resolve design and right-of-way issues and other SCRRA concerns.

Response to Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

885-1690

This is an introductory paragraph providing context for the detailed comments provided later in the letter. The commenter states that it does not signify approval of the alignment or agreement with the Authority on corridor-wide issues. The Authority acknowledges that the comments do not signify approval or agreement. Please see responses to comments 885-1691 through 885-1700 contained in this chapter of the Final EIR/EIS for responses to the detailed comments provided.

885-1691

The commenter provides detailed comments on HSR Build Alternative track alignments.

· 1, 2, and 3—Shoofly track design is preliminary and used for the purpose of establishing the project footprint. Details of referenced shoofly track will be provided during final design.
· 4—The top left typical section shows HSR in a trench with OCS poles mounted on retaining walls. Retaining walls are shown.
· 5—The design of Lockheed Channel is preliminary and used for the purpose of establishing the project footprint. Given the approximately 25-foot clearance to the center of track, the existing channel section was assumed to satisfy lateral loads acting within the zone of influence. If any structural retrofit of the Lockheed Channel is necessary, it is anticipated to remain within project footprint. Additional detail will be provided during final design
· 6—The clearance between the trench wall and the shoofly track is 8.5 feet and will require approval for deviation. The shoofly track is temporary and SCRRA clearance will be met as a permanent condition. The Authority will coordinate with SCRAA during final design.
· 7—The referenced reinforced concrete box is shown in the cross-section in Volume 3 of this Final EIR/EIS. However, the location of the ground at the reinforced concrete box is correctly depicted on referenced typical section.
· 8—The limits of the cut-and-cover structure are depicted correctly and provide the extent of the structure supporting the Metrolink track. The limits of the tunnel on the TT-D1202 have been clarified in Volume 3 of this Final EIR/EIS. The design of the HSR Build Alternative is preliminary in nature and will be provided in more detail during final design.
· 9—The clearance to the referenced section is 13 feet to the right-of-way and adheres to SCRRA criteria.
· 10—The existing crossover and related point of switch located at the western end of the proposed shoofly (near Hollywood Boulevard) provides enough clearance to support existing train movements without the need to relocate/alter existing control point CP Katz. The existing crossover was designed to work with both the shoofly and the proposed HSR Build Alternative. Additionally, the signalization was intended to work similar to existing with minimal impacts to train operations and timetables. In all, the cutover from shoofly to permanent condition would work with existing control point.

Response to Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

885-1691

However, actual cutover times would require additional modelling and analysis during later stages of design. The design at this location is preliminary in nature and details on construction phasing, duration, and detailed costs will provided in final design.

· 11—The referenced vertical clearance will be investigated to meet the minimum 24-foot requirement per design criteria. A criteria deviation will be necessary in the case vertical clearance cannot be met.

· 12—Pier protection will be provided on both sides of the referenced pier is properly displayed in Volume 3 of this Final EIR/EIS.

· 13—Given the limited width of rail right-of-way and the location of the referenced pier at this location, horizontal clearance between tracks have been reduced, requiring a criteria deviation as identified in the Design Baseline Report. The design was based on a decision not to rebuild the overpass at Western Avenue.

· 14—Given the vertical clearance constraints at Western Avenue and Fairmont Avenue and the decision to provide a grade separation per restrictive UPRR criteria, both the maximum grades allowed on the vertical alignment and the mandatory 16.5-foot vertical clearance at Sonora Avenue and Flower Street led to increased vertical clearance at Grandview Avenue.

· 15—The referenced vertical clearance is a 24 feet per SCRRA Grade Separation Guideline 7.2.2, which states, “A permanent minimum vertical clearance of 24’-0” shall be provided for all Overhead Structures, measured from the top of the high rail to the lowest point of the structure. Additional vertical clearances may be required for features beyond those shown in the Engineering Standards, such as: correction of sag in the track(s); track raise; construction requirements; and future track raises [within the next five (5) years]. The elevation of the existing top of rail shall be verified prior to beginning construction. All discrepancies shall be brought to the attention of SCRRA prior to construction.”

· 16—The HSR Build Alternative was designed to avoid impacting the Glendale Station as an existing condition. The referenced retaining wall is currently offset from the western station track by approximately 15 feet. The Authority will continue to coordinate with SCRRA regarding this area.

· 17—The realigned Terry Lumber Spur is necessary to transition into the lumber yard at a similar elevation to existing. However, this design is preliminary in nature and a detailed design will be provided during final design.

· 18—The Authority and the SCRRA discussed provision of access to the yard from both

885-1691

east and west banks. Recent studies support the addition of a crossover between HSR1/MT01 (Northbound West Bank Track) and UPRR2/Metrolink2 (Southbound East Bank Track) for yard inbound/outbound movements from both banks. A crossover has been added at the south end of CMF to ensure West Bank access to the yard. Modifications to the track work unrelated to the HSR project are proposed in anticipation of future operations, including increases in capacity and impacts to operations that require further discussion between the SCRRA and the Authority.

· 19—Modifications to trackwork are proposed unrelated to the HSR project in anticipation of future operations including increases in capacity and impacts to operations that require further discussion between the SCRRA and the Authority. A crossover has been added at the south end of CMF to ensure West Bank access to the yard.

20—The design is preliminary in nature and more detail regarding siding tracks used for storage will be provided during final design.

Response to Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

885-1692

The comment contains four components. The first portion of the comment asks if LADWP has been notified about the planned removal of the industrial spur referenced in Table 2-14. LADWP has not yet been notified about this planned removal. As required under PUE-UAMF#4, throughout final design, the Authority will coordinate with all applicable utility providers regarding specific utility infrastructure. No revisions to the Final EIR/EIS have been made in response to this portion of the comment.

The second portion of the comment suggests that a sewer line currently located under the Metrolink track be relocated out to avoid future impacts to Metrolink and Amtrak service should the City of Los Angeles need to access this sewer line for future repairs. As discussed in Section 3.6, Public Utilities and Energy, of this Final EIR/EIS, the Authority would suitably relocate any utilities that would conflict with the proposed project and cannot be protected in place while also maintaining access to the facilities. During final engineering and design, the City of Los Angeles would be provided the opportunity by the Authority to consult on the most suitable plan of action for this sewer line. No revisions to the Final EIR/EIS have been made in response to this portion of the comment.

The third portion of this comment suggests that because the HSR system would operate at low speeds (25 miles per hour) at Main Street, a crossing over the HSR tracks on the west bank of the Los Angeles River should be constructed for the location of a proposed access road to the traction power facility paralleling station. The access road was not proposed to be on west bank, to avoid introducing an at-grade crossing with the proposed HSR tracks. The access road as proposed on the East Bank utilizes the existing roadway crossing over the railroad tracks.

The fourth portion of the comment asks if a proposed signal house foundation and conduit would conflict with a proposed shallow reinforced concrete box and interlocker equipment. The locations of systems facilities are approximate at the current 15% level of design, and could be shifted during final design if conflicts are identified.

885-1693

The commenter provides detailed comments on HSR Build Alternative grade separation design plans contained in Volume III. The design at the Buena Vista Grade Separation and Colorado Street bridge structure is preliminary in nature and further details such as roadway approach slabs, active warning devices, and deflection in a seismic event will be determined during final design. GEO-IAMF#7 discussed in Section 3.9.4.2 of this Final EIR/EIS requires that the project be designed to withstand large seismic ground shaking. The Authority will continue to work with SCRRA through final design on this issue.

885-1694

The commenter provides detailed comments on the Burbank Airport Station design.

· 1—The incorrect section was referenced and has been updated to state that details regarding the modifications to the Downtown Burbank Metrolink Station can be found in Section 2.5.2.9.

· 2—The proposed cut-and-cover structure requires the northeast corner of the Regional Intermodal Transportation Center parking structure to be removed from service during construction, and then returned to service after construction is complete.

·3—The Burbank Airport Station is a dedicated HSR facility and is planned within Hollywood Burbank Airport property.

· 4—This request is not related to the HSR project and is not required to address an impact of the project. The Authority will continue to coordinate with SCRRA regarding the provision of the referenced items.

885-1695

The commenter requests clarification on whether or not Section 6.2.2 includes an allowance for agreements with SCRRA and if the cost for the Buena Vista Street, Victory Boulevard, and Main Street grade separations are included. The commenter also requests clarification on whether or not Table 6-3 includes the assignment of dispatching on the Burbank to Los Angeles Project Section to SCRRA. Section 6.2.2 of the Final EIR/EIS has been revised to add that allowances for agreements with SCRRA are not included.

Response to Submission 885 (Todd McIntyre, Metrolink Southern California Regional Rail Authority (SCRRA), August 31, 2020) - Continued

885-1696

The commenter requested that Appendix 2-C should clarify if SCRRA would dispatch HSR trains and if compensation would be provided. The Authority will enter into an operating agreement with the SCRRA to dispatch California High Speed Rail trains from Burbank to Los Angeles at the appropriate stage of the project.

885-1697

The commenter requests the addition of the SCRRA SCORE project, Burbank Speed and Safety Improvements, CMF North End Connection and Tail Track and the Metro Salem/Sperry Grade Separation project to the list of cumulative projects list included in Section 3.19 of this Final EIR/EIS.

The SCORE program was adopted in 2018 and the projects included in the program were not reasonably foreseeable projects at the time the cumulative impact analysis for the Burbank to Los Angeles Project Section Draft EIR/EIS was initiated in 2015. However, relevant SCORE program projects that are within the cumulative study area have been added to this Final EIR/EIS.

With regard to the Metro Salem/Sperry Grade Separation project, refer to footnote 2 in Table 2-10 of the Draft EIR/EIS and this Final EIR/EIS which states “Salem Street/Sperry Street would be grade-separated as a part of the Metro Doran Street and Broadway/Brazil Grade Separation Project. The project also proposes closing the existing at-grade railroad crossings at Doran Street and Broadway/Brazil Street. As this project would be completed before the introduction of HSR service, the crossing configurations are considered part of the existing conditions for the HSR project”. Because this project was considered part of the existing conditions for the HSR project, it was not considered in the cumulative impact analysis as a reasonably foreseeable project.

However, Section 3.19 has been revised to include several projects discussed in Chapter 2, as well as the Metrolink SCORE project, the Upper Los Angeles River and Tributaries Revitalization Plan, and the Los Angeles River Master Plan Update.

885-1698

The commenter provides a letter from Metro dated February 1, 2019 with comments on preliminary plans for the Burbank to Los Angeles Project Section. The Authority has addressed the referenced comments in the PEPD drawings included in Volume 3 of this Final EIR/EIS.

885-1699

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

The commenter provides a letter from Metro dated October 5, 2016 with comments on the 2016 Supplemental Alternative Analysis Report for the Burbank to Los Angeles Project Section. The Authority received the SCRRA comments on the Supplemental Alternatives Analysis dated October 5, 2016 and used them to inform the Burbank to Los Angeles Project Section PEPD and subsequent environmental impacts evaluation in the Draft EIR/EIS.

885-1700

The commenter provides an attachment with Metro Regional Rail comments on the preliminary plans and reports for the Burbank to Los Angeles Project Section. The Authority received the SCRRA comments on the Supplemental Alternatives Analysis dated October 5, 2016 and used them to inform the Burbank to Los Angeles Project Section PEPD and subsequent environmental impacts evaluation in the Draft EIR/EIS.

Submission 903 (George Lange, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020)

MOUNTAINS RECREATION & CONSERVATION AUTHORITY
Los Angeles River Center & Gardens
570 West Avenue Twenty-Six, Suite 100
Los Angeles, California 90065
Phone (323) 221-9944 Fax (323) 221-9934

July 29, 2020

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

<<*Transmitted via electronic mail:* Burbank_LosAngeles@hsr.ca.gov >>

RE: Draft EIR for California High-Speed Rail Project-Burbank to Los Angeles Project Section

Dear California High-Speed Rail Authority:

The Mountains Recreation and Conservation Authority (MRCA) respectfully submits comments to the California High-Speed Rail Authority (Authority) on the Draft Environmental Impact Report (DEIR) for the proposed California High-Speed-Rail (HSR) Project-Burbank to Los Angeles Project Section (Project). The approximately 14-mile Project would provide HSR service between the Burbank Airport Station and Los Angeles Union Station, and provide an important new alternative mode for regional and statewide transportation. We recognize and appreciate the enormous investment and leadership required to undertake and complete this generational project linking Northern and Southern California.

The Project's proposed alignment would closely abut the largest natural habitat block along the main stem of the Los Angeles River. Within the Taylor Yard area, the proposed project abuts over a mile-long section of ecologically significant soft bottom river channel, which is only one of two unique conditions along the river directly interfacing with two State Park properties (Rio de Los Angeles State Park and the G1/Bowtie Parcel). Further downstream from the Bowtie Parcel is the 42-acre City of Los Angeles (City) owned riverfront G2 Parcel, of which the MRCA owns a 12.5-acre multipurpose easement, in perpetuity. It is also situated across the River from Lewis MacAdams Riverfront Park owned by the MRCA. The Authority only gets one chance to design and approve a project that maximizes permanent public benefit and minimizes permanent detrimental effects to the above-described regionally significant cluster of public resources. This letter highlights items the MRCA hopes to be addressed in order to approve the Project's DEIR. 903-1807

The MRCA is a public agency which was established in 1985 pursuant to the Joint Powers Act and is a partnership between the Santa Monica Mountains Conservancy (SMMC), the Conejo Recreation and Park District, and the Rancho Simi Recreation and Park District. The MRCA manages more than 75,000 acres of parkland and is dedicated to the preservation and management of local open space and parkland, wildlife habitat, watershed lands, and trails as well as ensuring public access to public parkland. As

A local public agency exercising joint powers of the Santa Monica Mountains Conservancy, the Conejo Recreation & Park District, and the Rancho Simi Recreation & Park District pursuant to Section 6500 et seq. of the Government Code.

advocates for the Los Angeles River, we have actively acquired and developed open spaces adjacent to the River. to undergo river restoration efforts, to develop and provide planning of River and tributary path greenways and existing parks and planned future parks, which provide habitat for Los Angeles' wildlife in an otherwise concretized city.

The MRCA with the City and California State Parks, through our "100-Acre Partnership at Taylor Yard" (Partnership) in development, are readying to begin a coordinated community-driven, design effort that will initiate phased improvements across the G1 (Bowtie) and G2 parcels to create a long-term interconnected Taylor Yard River Park, including Rio de los Angeles State Park. Any permanent encumbrance or restriction over these sites would greatly inhibit the Partnership's ability to design and implement any potential for floodplain reclamation and restoration of a natural river whose course flowed this same route, all of which are planned through a future park that is responsive to the needs of the surrounding communities. There are many factors that the Taylor Yard design process must consider, including environmental remediation, existing rail and utility easements, interior connectivity, potential relocation of the high voltage power transmission lines, and potential bridge and/or tunnel connections to the Sotomayor Arts and Sciences Magnet and Rio de los Angeles State Park. As with all MRCA and State Parks open space, the park will be designed as a day-use park that will be closed to visitors and vehicle traffic from sunset to sunrise.

The MRCA and SMMC have been monitoring the proposed Project over the last several years. We have compiled below a list of items with which we would like to share with you and hopefully will be thoroughly addressed before the DEIR is approved.

Compatibility with State Investment/Regional Serving Open Space
The State of California (through State Parks and several State grant funding agencies) and City of Los Angeles have combined to spend over $100 million dollars in public spending to acquire 100-acres of public open space at Taylor Yard. Park development has been implemented at Rio de los Angeles State Park, and is yet early in design planning for the Bowtie and G2 parcels. The adjacency of this Project could seriously impact the level of improvements that could be successfully developed and limit the State and regional public's ability to utilize those future improvements. The Project should seek to provide compatibility with State investments and uses, while being on par to support fruition of the regional open space improvements in planning.

Impact to the Los Angeles River and Wildlife
The proposed project is located in such a publicly important zone that it must be designed to buffer, complement, and blend in with public natural and recreation areas. As mentioned previously, the surrounding public properties are investments that have been acquired over a couple of decades at the cost of millions of public dollars. Development of high-quality habitat and ecological restoration are primary goals of the improvements to be constructed at the Bowtie and G2 parcels by the Partnership, as is hydrologically reconnecting the River into these sites. These future improvements are expected to

Submission 903 (George Lange, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

create significant new areas of restored riparian and upland riparian habitat that will be immediately adjacent to the Project, including daylighting of several underground drains that transverse beneath the existing rail corridor before outfalling into the Los Angeles River. As train activity and construction are known to impact wildlife, the habitat that surrounds the Project must be further bolstered in order to provide greater habitat density per square meter. Construction activities and HSR operations could greatly impact success of these restoration activities and the Burbank - Los Angeles project team should work with the Partnership's planning team to ensure that impacts to habitat restoration are minimized, and assess which mitigations from the Project should be implemented into the adjacent Taylor Yard River Park. 903-1808

The most obvious important project changes to include are minimum fifty-foot-wide alignment and lighting setbacks from the Los Angeles River public right-of-way, especially in the area near the Metrolink CMF. Minimum horizontal setbacks are critical to limit degradation of both existing and future restored habitat on high value urban public lands. No alternative should have less setback acreage than the above-requested "Minimum 50-Foot River and State Park Setback" alternative. At least one alternative must have twice that amount of contiguous River and State Park acreage setback to achieve a no significant biological and visual impact project. The MRCA urges a broad range of DEIR alternatives, however neither the proposed Project nor the no build alternative examine setbacks even nearing a "Minimum 50-Foot River Setback", a flaw requiring re-evaluation by the Authority for this specific alignment of the project. 903-1809

Proposed Alignment Behind Metrolink CMF

The Partnership (City, State Parks, and MRCA) were recently awarded State Proposition 1 grant funds from the SMMC to construct a greenway along the edge of the Bowtie and G2 Parcels, called Paseo del Río. Planning on this project has just begun and will require several years before it can be constructed. While this is the first funded project to link improvements within public open space on the east-bank of the River in the Taylor Yard area, it should not be the last. The Project's proposed alignment west of (behind) the Metrolink CMF and occupying the narrow remainder of land adjacent to the top of River channel appears from all available documents to prevent a future down-stream extension of the river-edge Paseo del Río from the G2 Parcel linking down to the Arroyo Seco. The existing public River path on the Elysian Valley (River's west-bank) has extremely high usership that will further increase when the Downtown Los Angeles and San Fernando Valley gaps are closed linking all 51-miles of the Los Angeles River through a multi-modal path. The success to date of this commuter and recreational path have created a regional need to provide an additional corridor that alleviates crowding, safely allows multiple types of users, and helps to provide an alternate route linking Northeast Los Angeles to Downtown. 903-1810

Planning documents including the City's *Los Angeles River Revitalization Master Plan* (LARRMP), County's *Los Angeles River Master Plan*, Army Corps of Engineer's *Los Angeles River Ecosystem Restoration Project*, and SMMC's *Upper Los Angeles River*

and Tributaries Revitalization Plan all identify and recommend greenways be implemented along both banks of the River, including within this stretch that links Glassell Park to Cypress Park. The proposed alignment by HSR between the Metrolink CMF and the River seems to preclude this possibility from ever happening, unless significantly cost preventative engineering designs such as a cantilevered path were to be built out over the River. However, an HSR alignment that follows the existing rail corridor to the east of the Metrolink CMF would not jeopardize future opportunities to construct an east-bank greenway that links the G2 Parcel to Cypress Park, the future Metro Downtown Bike Path and Arroyo Seco Greenway, and is the case throughout the remaining entirety of the Project. We urge you to consider shifting the alignment east of the Metrolink CMF, or at a minimum provide sufficient detail that a future Paseo del Río Greenway extension connecting downstream to the Arroyo Seco is feasible with your proposed alignment. 903-1811

Taylor Yard Park Permanent Access

Open space at Taylor Yard has been envisioned for years in the LARRMP and the Ecosystem Restoration Project, not only by the City of Los Angeles, but also by the U.S. Army Corps of Engineers; however the Partnership takes it one step further by envisioning connectivity and continuity between the three properties that make up the future 100-Acre Taylor Yard River Park. This vision has been community led and we want to deliver on that, which is why the Taylor Yard landowners want to ensure that the HSR project does not negatively impact the vision but instead invests in grade improvements that connect people and wildlife between these properties. Furthermore, the Burbank - Los Angeles project team should undertake an analysis in collaboration with the State Parks, MRCA, and the City to develop a concept for a grade separation of rail through the entire Taylor Yard area. 903-1812

Exhibits within the DEIR, RW-M4139 and RW-M4239, identify a Temporary Construction Easement (TCE) to be secured and built over the FedEx property at 2000 N. San Fernando Road in order to gain construction access to the Project site in the Taylor Yard area. The current access points to the Bowtie and G2 Parcels only exist from the north via Kerr Street and to the south through the Metrolink Access Road, respectively. While planning for the eventual build-out of both Parcels is underway, it is anticipated that an additional central access point to the 100-Acre Parcels is needed for the long-term development of public open space at Taylor Yard. As a Project mitigation, we recommend that you consider securing a permanent access easement (instead of a temporary one) through the FedEx property that would allow construction activities for the Project to occur, and could then remain as a permanent public accessway into the Taylor Yard River Park. The recommended Park accessway would need grade separation from the Project alignment, but represents a long-term need that has yet to be solved providing interior public access to the Taylor Yard River Park area. This opportunity to secure a permanent accessway easement could be a win-win for both the Project, the Partnership at Taylor Yard, and direct access for the community on the east side whose residents have been inadequately planned for. 903-1813

Submission 903 (George Lange, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

Community Displacement

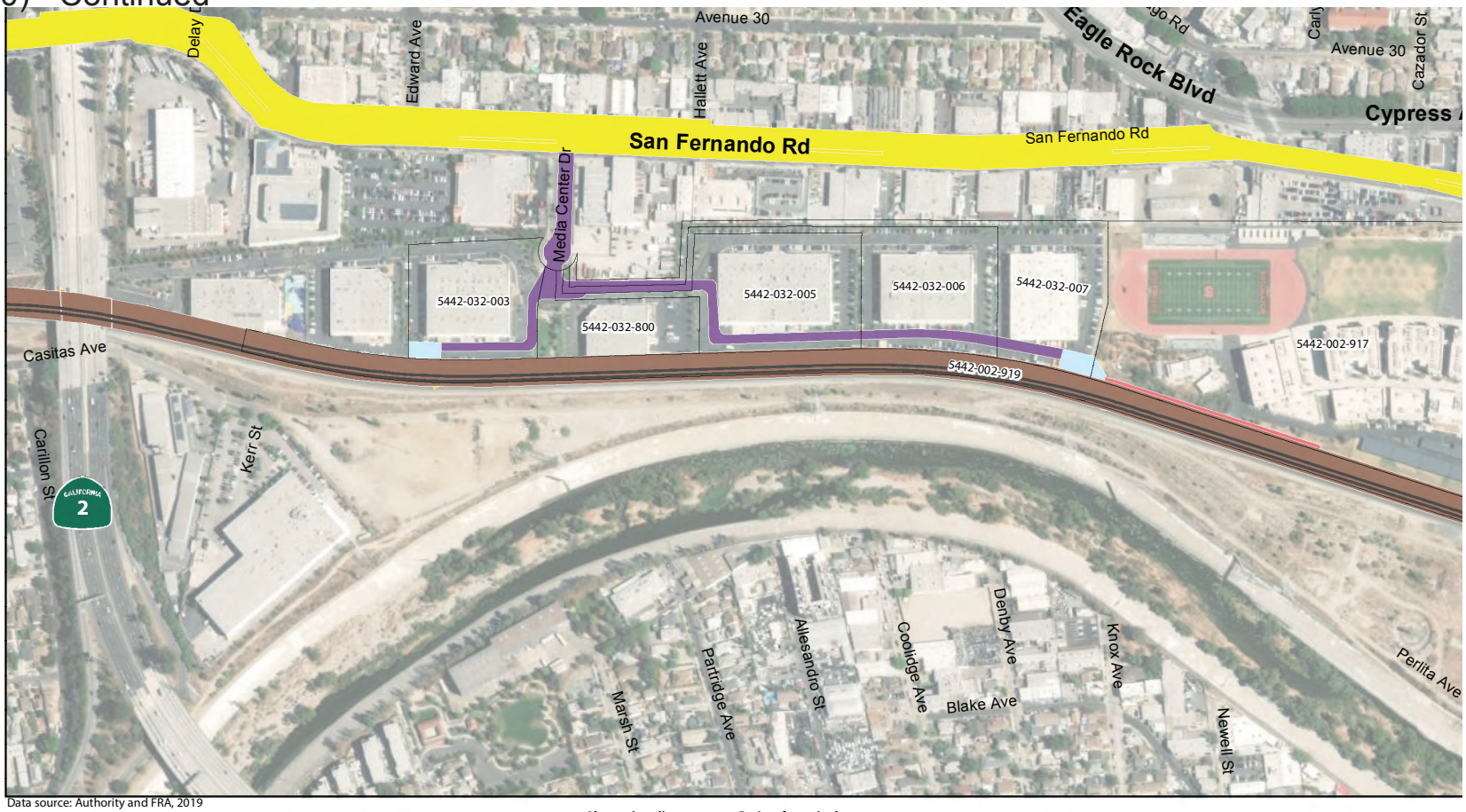
903-1814 While new housing, in-particular affordable and low-income housing, is desperately needed throughout Los Angeles, there is a wide-spread concern that large infrastructure improvements, such as the Project, will lead to gentrification of communities surrounding the Project's alignment and displacement of current residents. As a member organization of the Los Angeles Regional Open Space and Housing (LAROSAH) Collaborative, the MRCA does not believe that affordable housing and open space protection need to be mutually exclusive; however, all infrastructure improvements including this Project, should help to meet affordable housing and protection of open space objectives outlined by LA ROSAH. The MRCA supports investments in communities which also protect the social fabric of respective neighborhoods – and strongly encourages the Authority to ensure that this Project not adversely impact the already economically impacted communities along the River.

Please address any future documents, notices, and questions to our Chief of Watershed Planning staff Brian Baldauf at the above letterhead address, by phone at (323) 221-9944 x 190, and email at brian.baldauf@mrca.ca.gov.

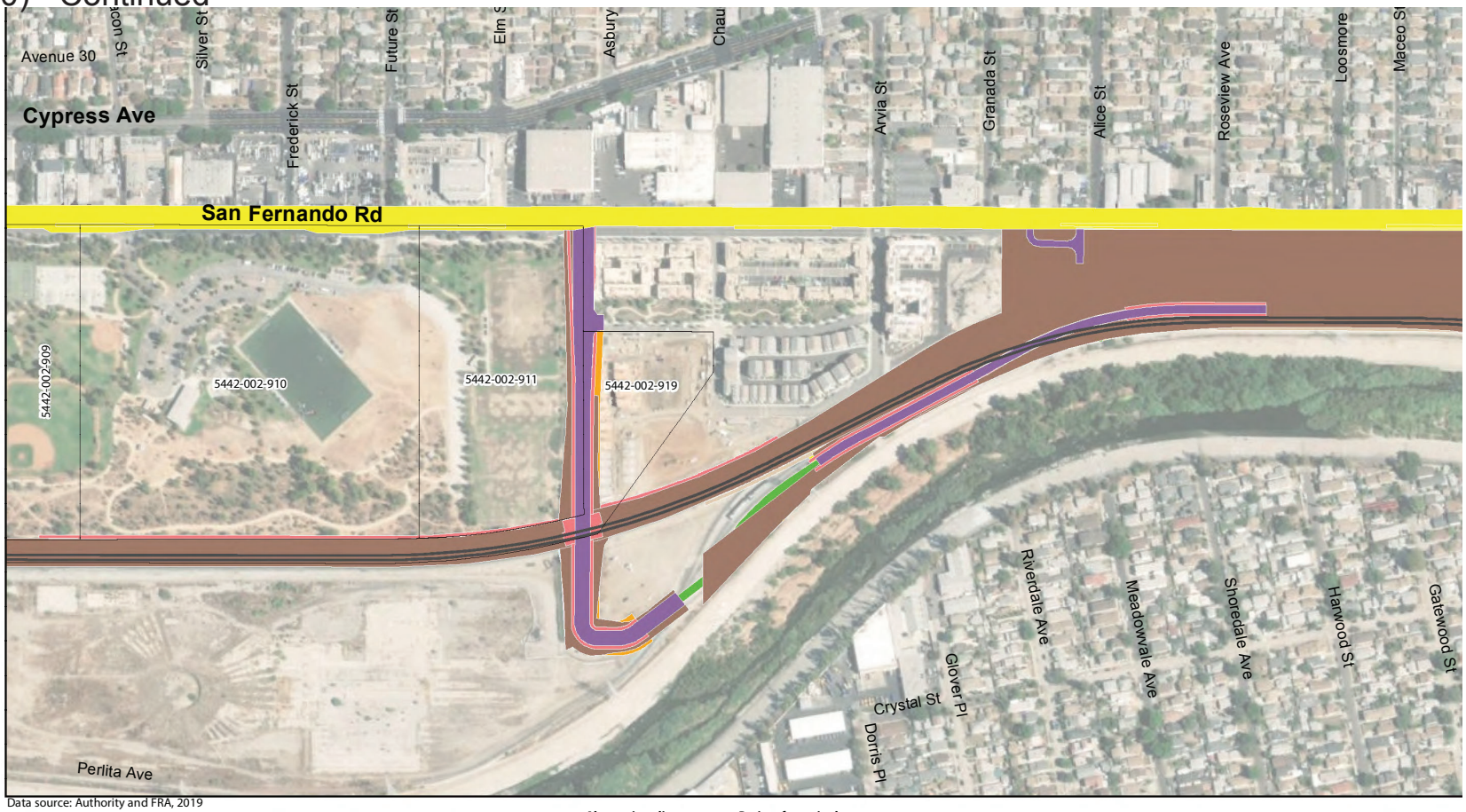
Sincerely,

George Lange
Chairperson

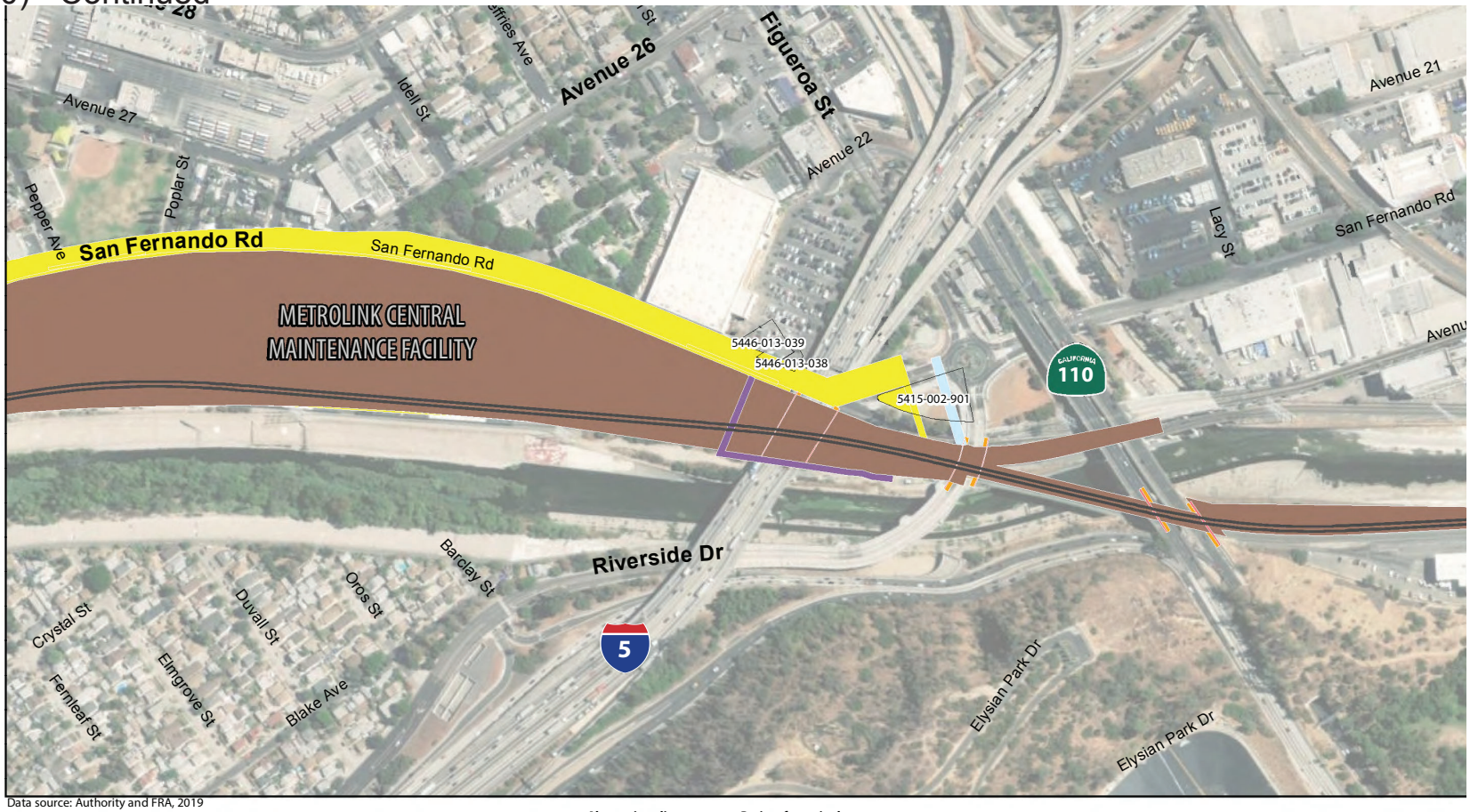
Submission 903 (George Lange, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued



Submission 903 (George Lange, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued



Submission 903 (George Lange, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued



CALIFORNIA High-Speed Rail Authority

Response to Submission 903 (George Lange, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020)

903-1807

The commenter expresses concern that the alignment would impact current and future access to 100 acres of public open space and parkland, including future improvements at Taylor Yard, such as the G1 Parcel (Bowtie Parcel) and G2 Parcel. Section 3.15 of this Final EIR/EIS has been revised to include a discussion of the HSR Build Alternative's consistency with the Los Angeles River Revitalization Plan, including the state funding allocated for the Taylor Yard Opportunity Area, which includes both the G1 Parcel (Bowtie Parcel) and Proposed G2 Taylor Yard Park. A discussion of potential impacts to the Bowtie Parcel has been added under Impact PK#2. As the HSR Build Alternative project footprint would not require right-of-way acquisition within this resource, project improvements would be completed outside the resource boundaries, and the resource is located near an existing rail corridor, the only potential impacts are related to Air Quality, Noise, and Visual Impacts during Construction as discussed under Impact PK#2. Impacts to the Proposed G2 Taylor Yard River Park are already included in the impact analysis in Section 3.15.6.3.

903-1808

The commenter expresses concerns that the HSR Project could impact planned restoration activities along the Los Angeles River and requests that the Authority work with the 100-Acre Partnership at Taylor Yard organization to ensure that impacts to planned restoration areas are minimized and to assess potential mitigation opportunities within the planned Taylor Yard River Park area. The Authority acknowledges the request; however, there is no nexus between impacts of the project on wildlife (refer to Impacts BIO #2 and BIO #8 discussed in this Final EIR/EIS) and a new measure to increase habitat density in the planned Taylor Yard River Park area as part of the project. The comment does not dispute any CEQA impact conclusions made in the Draft EIR/EIS or dispute the effectiveness of impact avoidance and minimization and mitigation measures included in the Draft EIR/EIS, although it should be noted that HSR Project would neither preclude nor conflict with the restoration activities proposed under the Los Angeles River Revitalization Master Plan or the Los Angeles River Ecosystem Restoration Final Feasibility Report and associated EIR/EIS. No revisions to this Final EIR/EIS have been made in response to this comment.

903-1809

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

The commenter requests that the design of the HSR Build Alternative be refined to include a minimum 50-foot-wide alignment and lighting setbacks from the Los Angeles River public right-of-way, especially in the area near the Metrolink CMF. The HSR alignment evaluated in this Final EIR/EIS has been refined through the Tier 1 and Tier 2 analyses to be as minimally impactful as possible while also meeting overall project objectives, as discussed in more detail in BLA-Response-Chapter 2 Alt-01: Alternatives. The HSR alignment proposed within the existing rail right-of-way, outside the limits of the CMF, would maintain similar clearance as the existing main line track. The HSR alignment proposed at the CMF would be approximately 15 feet closer to the referenced Los Angeles River right-of-way which, similar to the existing tracks, would not meet the minimum 50-foot-wide setback. The request for a 50-foot wide alignment is not possible without shifting the existing CMF infrastructure to the east and permanently altering yard operations which would not be economically or technically feasible.
The commenter also states that no alternatives should have less setback acreage than the minimum 50-foot river and state park setback and that at least one alternative must have twice that amount to achieve a no significant biological and visual impact project. Sections 3.7 and 3.16 of this Final EIR/EIS include specific analyses related to direct and indirect impacts on biological and aesthetic resources respectively, along with measures included to avoid, reduce, minimize, and compensate for such impacts. The Authority believes that it has fully identified the potential impacts on biological and aesthetic resources and provided adequate avoidance, minimization, and mitigation measures to address those impacts. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 903 (George Lange, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

903-1810

The commenter requests the Paseo del Rio project, a proposed greenway between the Bowtie Parcel and G2 Parcel, be added to the analysis. The planned Bowtie Parcel and planned Paseo del Rio have been added to Figure 3.15-2 and Table 3.15-3 and are now included in the impact discussion in Section 3.15.6.3. Section 3.15 of this Final EIR/EIS has been revised to include this discussion. Furthermore, the HSR Build Alternative project footprint would not encroach onto the Bowtie Parcel and no permanent acquisition of park property at the proposed Taylor Yard G2 River Park would occur. In addition, the proposed alignment of the HSR Build Alternative in relation to the Metrolink CMF and adjacent parcels can be seen on Page 13 of 16 in Appendix 3.1-A of this Final EIR/EIS. Therefore, as the planned Paseo del Rio would include a greenway connection between these two parcels along the western edge of these properties along the Los Angeles, the HSR Build Alternative would not preclude the implementation of this planned project.

The comment also states the proposed HSR Build Alternative alignment would preclude a future downstream extension of the river edge linking the G2 Parcel to Arroyo Seco. As described in Section 3.15.5 of this Final EIR/EIS, Table 3.15-3, Parks and Recreational Resources in the Resource Study Area, Resource #31 is the Los Angeles River Bike Path, which includes the 8-mile Planned Extension to Downtown Los Angeles. As described in Section 3.15.6 of this Final EIR/EIS, if the planned extension of the Los Angeles River Bike Path is not yet operational at the time the HSR Build Alternative is constructed, portions of the currently proposed alignments would be permanently converted to rail right-of-way. Through implementation of PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would provide alternative routes for the acquisition of existing or planned bicycle routes. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity.

903-1811

The commenter states that the proposed HSR alignment between the Metrolink CMF and the Los Angeles River seem to preclude the possibility of implementing the recommended greenways along both banks of the Los Angeles River and requests that the alignment be shifted to the east of the Metrolink CMF. Such an alignment was extensively studied as the project design was developed, and ultimately found to be infeasible due to operational concerns. The key operational issue with the suggested design is that all Metrolink trains entering and exiting the CMF would need to use or cross the two high-speed rail tracks at speeds of approximately 25 miles per hour at the south end of the facility under Interstate 5. This led to significant delays to rail operations in the corridor, and did not allow for reliable high-speed rail operations in the area which met the objectives of the project.

As connectivity between Rio de Los Angeles State Park and Taylor Yard is identified within the Los Angeles River Revitalization Master Plan, impacts on future planned connections are addressed in Section 3.15.3 of this Final EIR/EIS. As shown in Volume 3 of this Final EIR/EIS, there would be approximately 25 feet of space at the narrowest point between the HSR retaining wall and the lip of the riverbank in this area. Therefore, the HSR Build Alternative would not make the existing condition more narrow and the appropriate parties should be able to work with the USACE and LADWP to construct a path through this area. However, Section 3.15.3 of this Final EIR/EIS has been revised to include a conservative analysis and states, “The HSR Build Alternative would not result in a loss of parkland but may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreational as identified in the LARRMP under objectives related to the Taylor Yard Opportunity Area.” However, through implementation of mitigation measure PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would work with the affected jurisdiction to provide alternative routes where existing or planned bicycle routes are impacted. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity.

Response to Submission 903 (George Lange, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

903-1812

The commenter expresses their concern that the HSR Build Alternative is negatively impacting the vision of the 100-Acre Taylor Yard River Park and that the Authority should invest in grade improvements that connect people and wildlife. As connectivity between Rio de Los Angeles State Park and Taylor Yard is identified within the Los Angeles River Revitalization Master Plan, impacts on future planned connections are addressed in Section 3.15.3 of this Final EIR/EIS. Section 3.15.3 of this Final EIR/EIS has been revised to state, "The HSR Build Alternative would not result in a loss of parkland but may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreation as identified in the LARRMP under objectives related to the Taylor Yard Opportunity Area." However, through implementation of mitigation measure PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would work with the affected jurisdiction to provide alternative routes where existing or planned bicycle routes are impacted. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity.

903-1813

The commenter requests that, as a mitigation for project impacts on the 100-Acre Parcels, that the Authority consider securing a permanent access easement (instead of a temporary one) through the FedEx property that would allow for a permanent public accessway into the Taylor Yard River Park. Refer to Response to Comment 903-1812 in this chapter of the Final EIR/EIS regarding access to the Taylor Yard Opportunity Area. The Authority will not be securing a permanent access easement through the Fed Ex property.

903-1814

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

The commenter states that there is a widespread concern that large infrastructure improvements, such as the HSR Project, will lead to gentrification of communities surrounding the HSR Project's alignment and displacement of current residents. The commenter also states all infrastructure improvements, including this HSR Project, should help meet affordable housing and protection of open space objectives outlined by LAROSAH.

As shown in Table 3.12-43, a total of 12 residential units would be displaced by the HSR Build Alternative. As discussed under Impact SOCIO #3 in Section 3.12.6 of this Final EIR/EIS, the HSR Build Alternative in this project section is expected to result in 6 single-family residential displacements, 6 multifamily residential displacements, and 133 business displacements. As described in Section 3.12.6.3, Impact SOCIO#3 sufficient number of comparable replacement residences are available in all areas where there would be displacements and relocations. There are 58 vacant multifamily residential units within the city of Los Angeles, which exceeds the 4 multifamily residential displacements in the city of Los Angeles.

No residential or commercial buildings would be constructed as part of the HSR Project.

As discussed in Chapter 4, Section 4(f) and Section 6(f) Evaluations, of this Final EIR/EIS, the HSR Build Alternative would result in the permanent use of one resource, the San Fernando Railroad Bike Path (Planned) (B-5), and de minimis impacts on three recreational facilities (the planned Phase 3 of the San Fernando Bike Path, Rio de Los Angeles State Park, and Albion Riverside Park. PR-MM#4 would be implemented, which would require the Authority to consult with the official with jurisdiction over the San Fernando Railroad Bike Path regarding the permanent easement that would preclude this planned bike path from being implemented within the existing Metro right-of-way. Coordination with the official with jurisdiction will include discussion of alternative routes that would preserve the planned use and functionality of proposed San Fernando Railroad Bike Path. Therefore, recreational and open space resources would be protected under the HSR Project. As discussed in Section 5.6.2, gentrification may

Response to Submission 903 (George Lange, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

903-1814

occur in the vicinity of the HSR alignment regardless of whether the HSR Build Alternative is constructed because the project is within an existing rail corridor located in communities where these trends are already occurring.

Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020)

Burbank - Los Angeles - RECORD #908 DETAIL	
Status :	Action Pending
Record Date :	9/4/2020
Submission Date :	8/31/2020
Interest As :	Local Agency
First Name :	Brian
Last Name :	Baldauf

August 31, 2020

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

<<Transmitted via electronic mail: Burbank_LosAngeles@hsr.ca.gov >>

Re: Burbank to Los Angeles Draft Environmental Impact Report/Environmental Impact Statement Comments

To whom it may concern,

908-1815

On behalf of the newly-formed "100-Acre Partnership at Taylor Yard" (100-Acre Partnership), the California Department of Parks and Recreation (State Parks), the Mountains Recreation and Conservation Authority (MRCA), and the City of Los Angeles (City) request that the California High-Speed Rail (HSR) Authority, in planning and analyzing its potential alignment through Taylor Yard, must be responsive to the vision of the 100-Acre Partnership as well as to existing adopted planning documents, including but not limited to, the Los Angeles River Revitalization Master Plan (LARRMP) (2007) and the Los Angeles River Ecosystem Restoration Project/Feasibility Study Recommended Plan ("Ecosystem Project") (2016).

The 100-Acre Partnership envisions 100-acres of physically-connected and unified public open space, at Taylor Yard, that advances revitalization of the Los Angeles River and supports urban ecology. The 100-acre properties include: (1) The Rio de Los Angeles (RdLA) State Park, an existing 40-acre park owned by State Parks and managed cooperatively by State Parks and the City through its Department of Recreation and Parks (RAP); (2) The Taylor Yard G1 parcel, an 18-acre property also known as the "Bowtie" parcel for its distinctive boundary shape, which is owned and managed and in the process of design by State Parks; and (3) The Taylor Yard G2 parcel, a 42-acre property that is owned by the City. The MRCA purchased and now holds the rights to a 12.5-acre multi-purpose easement within the Taylor Yard G2 parcel.

Open space at Taylor Yard has been envisioned for years in the LARRMP and the Ecosystem Project, however the 100-Acre Partnership takes it one step further by envisioning connectivity and continuity between these three distinct properties. This vision has been community led and we want to deliver on that, which is why the Partnership wants to ensure that the HSR project does not negatively impact the vision but instead invests in grade improvements that connect people and wildlife between these

www.100acrepartnership.org

Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

properties. The planned improvements to Taylor Yard are expected to create significant new areas of restored riparian and upland riparian habitat that will be immediately adjacent to the HSR alignment, including daylighting of underground storm drains that transverse beneath the existing rail corridor before outfalling into the Los Angeles River. As train operation and construction activity are known to impact wildlife, the existing and planned habitat that surrounds the Project must be further bolstered in order to provide greater habitat density per square meter. Furthermore the Burbank - Los Angeles project team should undertake an analysis in collaboration with the State Parks, MRCA, and the City to develop a concept for a grade separation of rail through the entire Taylor Yard area.

908-1816

908-1817

State Parks, the MRCA and the City of Los Angeles, have also submitted individual agency comment letters, below you will find some of the comments made related to the 100-acres at Taylor Yard:

Items from MRCA Comment Letter

- The 100-Acre Partnership was recently awarded State Proposition 1 Water Bond grant funds from the Santa Monica Mountains Conservancy (SMMC) to construct an over 1-mile river greenway along the edge of the G1 and G2 Parcels, called Paseo del Río. Planning on this project has just begun and will require several years before it can be constructed. While this is the first funded project to link improvements within public open space on the east-bank of the River in the Taylor Yard area, it should not be the last. The Project's proposed alignment west of (behind) the Metrolink CMF and occupying the narrow remainder of land adjacent to the top of River channel appears from all available documents to prevent a future down-stream extension of the river-edge Paseo del Río from the G2 Parcel linking down to the Arroyo Seco. The existing public River path on the Elysian Valley (River's west-bank) has extremely high usership that will further increase when the Downtown Los Angeles and San Fernando Valley gaps are closed linking all 51-miles of the Los Angeles River through a multi-modal path. The success to date of this commuter and recreational path have created a regional need to provide an additional corridor that alleviates crowding, safely allows multiple types of users, and helps to provide an alternate route linking Northeast Los Angeles to Downtown. Planning documents including the *LARRMP*, County's *Los Angeles River Master Plan*, Army Corps of Engineer's *Ecosystem Project*, and SMMC's *Upper Los Angeles River and Tributaries Revitalization Plan* all identify and recommend greenways be implemented along both banks of the River, including within this stretch that links Glassell Park to Cypress Park. The proposed alignment by HSR between the Metrolink CMF and the River seems to preclude this possibility from ever happening, unless significantly cost preventative engineering designs such as a cantilevered path were to be built out over the River. However, an HSR alignment that follows the existing rail corridor to the east of the Metrolink CMF would not jeopardize future opportunities to construct an east-bank greenway that links the G2 Parcel to Cypress Park, the future Metro Downtown Bike Path and Arroyo Seco Greenway, and is the case throughout the remaining entirety of the proposed alignment. We urge you to consider shifting the alignment east of the Metrolink CMF, or at a minimum provide sufficient detail that a future Paseo del Río Greenway extension connecting downstream to the Arroyo Seco is feasible with your proposed alignment.

908-1818

908-1819

- Exhibits within the EIR/S, RW-M4139 and RW-M4239, identify a Temporary Construction Easement (TCE) to be secured and built over the FedEx property at 2000 N. San Fernando Road in order to gain construction access to the Project site in the Taylor Yard area. The current access points to the G1 and G2 Parcels only exist from the north via Kerr Street and to the south through the Metrolink Access Road, respectively. While planning for the eventual build-out of both Parcels is underway, it is anticipated that an additional central access point to the 100-acre area is needed for the long-term development of the integrated public open space at Taylor Yard. As a Project mitigation, we recommend that you consider securing a permanent access easement (instead of a temporary one) through the FedEx property that would allow construction activities for the Project to occur, and could then remain as a permanent public accessway into the Taylor Yard River Park. The recommended Park accessway would need grade separation from the HSR crossing, but represents a long-term need that has yet to be solved providing interior public access to the Taylor Yard River Park area. This opportunity to secure a permanent accessway easement could be a win-win for both the Project, the 100-Acre Partnership, and direct access for the community on the east side whose residents have been inadequately planned for.

908-1820

Items from City of Los Angeles Comment Letter

- The California High Speed Rail (HSR) Authority, in planning and analyzing its potential alignment through the City of Los Angeles and the Los Angeles River corridor, must be responsive to existing adopted planning documents, including but not limited to:
    - Los Angeles River Revitalization Master Plan (LARRMP) (2007)
    - Los Angeles River Ecosystem Restoration Project/Feasibility Study Recommended Plan ("Ecosystem Project") (2016)
    - Northeast Los Angeles (NELA) Riverfront Vision Plan (2014)
    - City of Los Angeles Mobility 2035 Plan (an element of the General Plan) (2016)
    - City of Los Angeles Sustainability Plan ("pLAn") (2015)
    - Plan for a Healthy Los Angeles (2015)
    - Cornfield Arroyo Specific Plan (CASP, 2014)
- The Taylor Yard area is one of the most important sites along the Los Angeles River for open space, recreation, wildlife habitat, and other community-serving uses. The overall Taylor Yard area was once a more than 250-acre rail yard. After its decommissioning, parcels were sold off; one of the parcels was the 42-acre G2 site, which the City purchased in 2017. The following comments specifically pertain to the approximately 100 acres that are comprised of the 42-acre G2 parcel (owned by the City of Los Angeles), the 40-acre Rio de Los Angeles State Park (owned by California State Parks and co-operated by California State Parks and the City of Los Angeles), and the 18-acre G1 Parcel (owned by California State Parks and also known as the "Bowtie Parcel"). Planned projects at Taylor Yard include riparian and wetland habitat restoration, public open space, and community access, among other elements.
- The Taylor Yard G1 parcel is not correctly represented or analyzed in the EIR/S for the River-related projects that are planned for its location (see impact PK #3). Such project plans exist in the LARRMP, the Ecosystem Plan, and elsewhere. In fact, an image from the LARRMP is shown on 3.16-28 of the document that exhibits a rendering of planned open space projects over the 100-acre Taylor Yard area, including on the G1 parcel.

908-1821

908-1822

Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

908-1823
- The Nature Conservancy (TNC) is pursuing a stormwater daylighting/wetland project on the G1 site in partnership with State Parks. Impacts to the G1 parcel must be addressed and mitigated, if possible. It appears that the G1 parcel is not included in consideration of impacts to recreational, park, open space, or cultural resources, which should be corrected. Mitigations are likely appropriate for impacts to the G1 parcel during construction and operation of the proposed HSR project.

908-1824
- The analysis fails to include analysis and evaluation of the State Parks-owned G1 Parcel adjacent to Taylor Yard G2 parcel. In addition, the analysis fails to address the long term operational impacts from additional tracks and trains that will significantly prevent the use of an established park, recreation, or open space, in particular the G1 "Bowtie" Parcel, G2 Parcel, and RdLA State Park, due to the aesthetic, noise, vibration, and visual impacts from the project discouraging residents to use the park. Therefore a new mitigation measure is required to mitigate the impact and the HSR tracks should be lowered in this section so that the tracks and train are hidden within a berm on either side to reduce noise and aesthetics and visual impacts on parks.

908-1825
- A key goal in coordinating the multiple planned and active projects at Taylor Yard, as discussed in community meetings, the LARRMP, and the Ecosystem Project is to enable connection between the Rio de Los Angeles and G2 parcel sites. The EIR/S does not analyze the project's significant impacts to that objective, nor propose mitigations.

908-1826
- Just as significant investments have already been made and are further planned for grade separations for vehicles along the Burbank - Los Angeles segment, the connection of people and wildlife between these important resources should be included as an early action project.

908-1827
- ***The Burbank - Los Angeles HSR project team should undertake an HSR-funded analysis in collaboration with the 100-Acre Partnership to develop a concept for a grade separation of rail through the entire Taylor Yard area.*** A possible approach that has been discussed with the HSR team is to establish a new lower grade for the tracking there that would dip though the site to allow for a sizable land bridge to be constructed over the track to link the RdLA State Park State Park and G2 Parcel sites to allow for human and wildlife movement. This would also lead to a different design for the bridge over the Metrolink Central Maintenance Facility access road or eliminate its necessity in favor of a different approach that uses the grade separation to allow for vehicle access.

908-1828
- As stated in section Impact BIO #11: Operation Effects on Wildlife Movement "Permanent Direct effects from daily train operation or regularly scheduled maintenance activities may interfere with wildlife movement…..Regularly passing trains may not provide enough undisturbed time between passing intervals for some wildlife species to cross the alignment in certain areas". The increase in the number of trains crossing will significantly increase the number of bird collisions and deaths in between the existing and planned habitat of the LA River and Taylor Yard and the adjacent Sonia Sotomayor Learning Academies and Rio de Los Angeles State Park. Birds at risk may include collisions and deaths of Bell's Vireo that occur in the LA River and at RdLA State Park. Therefore, a new mitigation measure is required to mitigate the impact, and the HSR tracks should be lowered in this section between so that the tracks and train are hidden within a berm on either side which would allow birds to easily navigate between the tops of berms without colliding with trains.

908-1829
- The document appears to show that the existing oil pipeline that runs along the Taylor Yard area on the River side of the track would be permanently relocated to San Fernando Blvd. The 100-Acre Partnership would like to understand if this is an accurate understanding and also strongly suggests that this relocation be considered for an Early Action project. It is not clear what is proposed for oil pipelines along the alignment -- they should be relocated entirely to public rights of way.

908-1830
- The HSR project perpetuates the disproportionately high and adverse human health and environmental effects to low-income and minority communities of Cypress Park and Glassell Park by increasing the size and frequency of trains into the area and further separating the community from the LA River and planned parks and natural areas leading to permanent noise, vibration, parks, and public service impacts. The EIR/S does not sufficiently analyze the project's significant impacts to these communities nor propose adequate mitigation. Therefore, to offset these impacts HSR should assist the with the clean-up of the legacy railway pollutants at Taylor Yard to ensure the community can have a clean environment and safe access to the LA River, Nature, Parks and Open Space.

Items from California State Parks Comment Letter

908-1831
- In the Section 4(f) evaluation, the 18 acre G-1, or "Bowtie Parcel" of the former Taylor Yard complex was not included in the analysis and this oversight must be corrected. The Bowtie Parcel was acquired by DPR in 2003 with the intent of transforming this former railyard into park land. The undeveloped 18-acre parcel is designated as a sub-unit of Rio De Los Angeles State Park in Park General Plan as naturalized open space. Conceptual design for the full 18-acres is beginning in the next few months and DPR is currently involved in the design and development of two early activation projects on the site which would provide public amenities and habitat enhancement to the riverfront property. As such, impacts of the project on this property must be examined and included in the Final EIR/EIS.

908-1832
- With both the Bowtie Parcel and Rio De Los Angeles State Park, the frequency of High-Speed Rail trains, 16 per hour, is concerning, as is the potential noise associated with this intensity of rail traffic. Additionally concerning is the visual impact of fencing or sound walls that may be required as part of this project. DPR is concerned that both auditory and aesthetic impacts may negatively affect adjacent public parklands and that fencing and/or walls be carefully considered in the design of this project.

908-1833
- Finally, DPR questions the assertion that a de minimis impact is an appropriate finding regarding permanent alterations and grading proposed for 0.56 acres of Rio De Los Angeles State Park. Long term impacts to Rio de Los Angeles State Park, including the Bowtie Parcel, must be considered and mitigated as this project moves forward.

Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

The Partnership staff look forward to working with the Burbank - Los Angeles HSR project team and the Authority to plan, coordinate, and implement both important public serving projects. Please reach us through info@100acrepartnership.org or directly via the staff copied below.

Thank you for your consideration,

The 100-Acre Partnership at Taylor Yard Staff, representing State Parks, MRCA, and City of Los Angeles

Cc: California State Parks (Stephanie Campbell)
Mountains Recreation and Conservation Authority (Brian Baldauf, Sarah Rascon, Sarah Kevorkian)
City of Los Angeles, Mayor's Riverworks Office (Michael Affeldt, Stacy Farfan)
City Bureau of Engineering (Chris Johnson, Bryan Powell, Evann Gonzales, Atousa Gonchech)
City Recreation and Parks (Darryl Ford)

Response to Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020)

908-1815

The commenter requests that the Authority analyze the potential alignment through the planned Taylor Yard recreation area and be responsive to existing adopted planning documents, including the LARRMP (City of Los Angeles 2007) and the Los Angeles River Ecosystem Restoration Project/Feasibility Study Recommended Plan ("Ecosystem Project") (USACE, 2016). As described in Section 3.15.2 of this Final EIR/EIS, the LARRMP and Los Angeles River Ecosystem Restoration Project are both included in Table 3.15-1 Regional and Local Plans and Policies. Section 3.15.3 has been revised to state: "The HSR Build Alternative would not result in a loss of parkland and but may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreational experience." Section 3.15 of this Final EIR/EIS has been revised to incorporate the Bowtie Parcel as recreational resource. However, the impact analysis concludes that the HSR Build Alternative project footprint would not encroach onto the Bowtie Parcel; therefore, the HSR Project would not require any temporary construction easements, permanent easements, or permanent acquisition of the Bowtie Parcel. Furthermore, as described in Section 3.15.6.3 of this Final EIR/EIS, permanent impacts would occur to the Proposed Taylor Yard G2 River Park. However, permanent impacts would only occur in the form of permanent easements or grading, and no permanent acquisition of park property would be required for the HSR Project resulting in a permanent loss of parkland.

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

908-1816

The commenter expresses concerns that the HSR Project could impact planned restoration activities along the Los Angeles River and requests that the Authority work with the 100-Acre Partnership at Taylor Yard organization to ensure that impacts to planned restoration areas are minimized and to assess potential mitigation opportunities within the planned Taylor Yard River Park area. The Authority acknowledges the request; however, there is no nexus between the impacts of the project and a new measure to increase habitat density in the planned Taylor Yard River Park area as part of the project. The comment does not dispute any CEQA impact conclusions made in the Draft EIR/EIS or dispute the effectiveness of impact avoidance and minimization and mitigation measures included in the Draft EIR/EIS, although it should be noted that HSR Project would neither preclude nor conflict with the restoration activities proposed under the Los Angeles River Revitalization Master Plan or the Los Angeles River Ecosystem Restoration Final Feasibility Report and associated EIR/EIS. No revisions to this Final EIR/EIS have been made in response to this comment.

908-1817

The commenter requests that the Authority undertake an analysis in collaboration with the state parks, Mountains Recreation and Conservation Authority, and the City of Los Angles to develop a concept for a grade separation of rail through the entire Taylor Yard area. Refer to Response to Comment 903-1812 in this chapter of this Final EIR/EIS.

908-1818

The commenter expresses concern that the alignment would prevent a future downstream extension of the river edge from Paseo del Rio from the G2 parcel linking down to Arroyo Seco. This comment is a direct citation of comment 903-1810 from the Mountain Recreation and Conservation Authority (MRCA). Refer to response to comment 903-1810 in this chapter.

Response to Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

908-1819

The commenter states that the proposed HSR alignment between the Metrolink CMF and the Los Angeles River seem to preclude the possibility of implementing the recommended greenways along both banks of the Los Angeles River and requests that the alignment be shifted to the east of the Metrolink CMF. Such an alignment was extensively studied as the project design was developed, and ultimately found to be infeasible due to operational concerns. The key operational issue with the suggested design is that all Metrolink trains entering and exiting the CMF would need to use or cross the two high-speed rail tracks at speeds of approximately 25 miles per hour at the south end of the facility under Interstate 5. This led to significant delays to rail operations in the corridor, and did not allow for reliable high-speed rail operations in the area which met the objectives of the project.

As connectivity between Rio de Los Angeles State Park and Taylor Yard is identified within the Los Angeles River Revitalization Master Plan, impacts on future planned connections are addressed in Section 3.15.3 of this Final EIR/EIS. As shown in Volume 3 of this Final EIR/EIS, there would be approximately 25 feet of space at the narrowest point between the HSR retaining wall and the lip of the riverbank in this area. Therefore, the HSR Build Alternative would not make the existing condition more narrow and the appropriate parties should be able to work with the USACE and LADWP to construct a path through this area. However, Section 3.15.3 of this Final EIR/EIS has been revised to include a conservative analysis and states, “The HSR Build Alternative would not result in a loss of parkland but may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreational as identified in the LARRMP under objectives related to the Taylor Yard Opportunity Area.” However, through implementation of mitigation measure PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would work with the affected jurisdiction to provide alternative routes where existing or planned bicycle routes are impacted. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity.

908-1820

The commenter requests that, as a mitigation for project impacts on the 100-Acre Parcels, that the Authority consider securing a permanent access easement (instead of a temporary one) through the FedEx property that would allow for a permanent public access way into the Taylor Yard River Park. Refer to Response to Comment 903-1813 in this Chapter of this Final EIR/EIS.

Response to Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

908-1821

The comment states that the Authority in planning and analyzing its potential alignment through the city of Los Angeles and the Los Angeles River corridor, and therefore must be responsive to existing adopted planning documents.

The project is being undertaken by a state agency (the Authority). The project must conform to the policies and objectives of the statutes and regulations under which the Authority and the FRA operate. Because an agency of the state of California is the project proponent, the project is not subject to local government general plan policies or zoning regulations.

Nevertheless, the Authority recognizes that the project can be most successful if designed in a manner that is as sensitive as possible to the local environment through which it must travel, while still meeting the unique design constraints of HSR service. Through meetings with local agency staff and direct discussions with individual local government officials and staff, the Authority has endeavored to develop a project design that minimizes local impacts and is made as consistent with local plans as possible. Consistent with CEQA and NEPA requirements, the EIR/EIS discusses the project's consistency with local general plans and zoning regulations in Section 3.13, Station Planning, Land Use, and Development, and further in Appendix 3.1-B, Regional and Local Policy Consistency Analysis.

The Policy consistency analysis includes the Los Angeles River Revitalization Master Plan (LARRMP) (2007), Los Angeles River Ecosystem Restoration Project/Feasibility Study Recommended Plan ("Ecosystem Project") (2016), City of Los Angeles Mobility 2035 Plan (an element of the General Plan) (2016), City of Los Angeles Sustainability Plan ("pLAn") (2015), and Cornfield Arroyo Specific Plan (CASP, 2014). The Northeast Los Angeles (NELA) Riverfront Vision Plan (2014) does not contain any goals, objectives, or policies that are directly relevant to the HSR Project.

In response to this comment, the Plan for a Healthy Los Angeles (2015) was added to Section 3.13, Station Planning, Land Use, and Development, and in Appendix 3.1-B, Regional and Local Policy Consistency Analysis.

908-1822

The commenter requests that the Taylor Yard G1 Parcel (also known and referred to as the Bowtie Parcel) be added as a recreational resource and analyzed under Impact PK#3. Section 3.15 of this Final EIR/EIS has been revised to include the Taylor Yard G1 Parcel. This resource has been added to Figure 3.15-2 and Table 3.15-3 and is now included in the impact discussion in Section 3.15.6.3.

The impact analysis concludes that the HSR Build Alternative project footprint would not encroach onto the Bowtie Parcel; therefore, the HSR project would not require any temporary construction easements, permanent easements, or permanent acquisition of the Bowtie Parcel. As the HSR Build Alternative would not require any easements or construction activities that may impact access to the Bowtie Parcel, no impacts to this resource are discussed under Impact PK#1. The Bowtie Parcel is located within 250 feet of the HSR Build Alternative Project Footprint. With adherence to AQ-IAMF#1, N&V-IAMF#1, AVQ-IAMF#1, and AVQ-IAMF#2, impacts would be less than significant for construction air quality, noise, and vibration. As no permanent easements or acquisitions would be required, no impacts to this resource are discussed under Impact PK#3. Similarly, no changes to planned 100-acre Taylor Yard projects would occur as a result of the HSR Build Alternative. Therefore, no impacts to the Bowtie Parcel or resources within the 100-Acre Taylor Yard area are discussed under Impact PK#4. Based on the location of the Bowtie Parcel adjacent to an existing rail corridor, no impacts related to this resource from operation of the HSR Build Alternative are discussed under Impact PK#5. For the reasons stated above, neither construction nor operation of the HSR Build Alternative would result in significant impacts to the Bowtie Parcel. Section 3.15 of this Final EIR/EIS has been revised to include this discussion.

Response to Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

908-1823

The commenter requests the G1 Parcel or Bowtie Parcel be included in the impact analysis for recreational, parks, open space, and cultural resource impacts. Refer to Response to Comment 908-1822 contained in this chapter for the inclusion of the Bowtie Parcel in this Final EIR/EIS. In addition, as described in Section 3.17.5.1 of this Final EIR/EIS, the Area of Potential Effect (APE) for impacts on archaeological resources includes the project footprint and areas that could be subject to ground-disturbing activities. The APE for impacts on historic built (architectural) resources includes the project footprint plus all parcels abutting the railroad right-of-way, proposed grade separations, and other new construction, such as street improvements. Because the HSR Build Alternative would not encroach on the Bowtie Parcel and no ground-disturbing activities are proposed on this parcel, no revisions to the cultural resources analysis are required.

908-1824

The commenter requests the G1 Parcel (referred to herein as the Bowtie Parcel) be analyzed in terms of long-term operational impacts from additional tracks due to aesthetic, noise, vibration, and visual impacts. Section 3.15 of this Final EIR/EIS has been revised to include the Bowtie Parcel. This resource has been added to Figure 3.15-2 and Table 3.15-3 and is now included in the impact discussion in Section 3.15.6.3.

The HSR Build Alternative project footprint is adjacent to this proposed park; therefore, an analysis of impacts during construction was also added to Impact PK#2 in Section 3.15.6.3 of this Final EIR/EIS to determine if the HSR Project would result in indirect air quality, noise, or visual impacts to the proposed park. The impact under CEQA would be less than significant with implementation of AQ-IAMF#1, N&V-IAMF#1, AVR-IAMF#1, and AVR-IAMF#2 during construction of the HSR Build Alternative. Although fugitive dust, noise, vibration, and visual impacts during construction may influence users to choose alternative recreational resources and thereby increase the use of those resources, it is not anticipated that the temporary increase would be large enough to result in substantial physical deterioration of the alternative resources. Therefore, the impact under CEQA would be less than significant and CEQA does not require mitigation.

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

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

Response to Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

908-1824

Parcel.

For the reasons stated above, neither construction nor operation of the HSR Build Alternative would result in significant impacts to the Bowtie Parcel, and Section 3.15 of this Final EIR/EIS has been revised to include this discussion.

908-1825

The commenter requests that the planned projects at Taylor Yard, including a plan to connect the Rio de Los Angeles State Park and G2 Parcel sites, be included in the analysis. As described in Response to Comment 908-1815 contained in this chapter, Section 3.15.3 has been revised to state: "The HSR Build Alternative would not result in a loss of parkland and but may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreational experience" for the Los Angeles River Ecosystem Restoration Project Objective: Increase Recreation. However, through implementation of PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would provide alternative routes for the acquisition of existing or planned bicycle routes. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity. Therefore, the HSR Build Alternative is consistent overall with the applicable local plans, goals, and policies.

908-1826

The commenter states that the connection of people and wildlife between the resources planned for the Taylor Yard area should be included as an early action project. The HSR Build Alternatives does not include connectivity between Rio de Los Angeles State Park and Taylor Yard and therefore cannot be advanced as an early action project. As connectivity between Rio de Los Angeles State Park and Taylor Yard is identified within the Los Angeles River Revitalization Master Plan, impacts on future planned connections are addressed in Section 3.15.3. Section 3.15.3 of this Final EIR/EIS has been revised to state, "The HSR Build Alternative would not result in a loss of parkland but may preclude implementation of recreational resources (i.e., planned bikeways) inconsistent with the objective for increased regional recreational trails and improved recreational as identified in the LARRMP under objectives related to the Taylor Yard Opportunity Area." However, through implementation of mitigation measure PR-MM#4, Replacement of Property Acquired from Existing or Planned Bicycle Routes, the Authority would work with the affected jurisdiction to provide alternative routes where existing or planned bicycle routes are impacted. Where property that contains existing or planned bicycle paths required for HSR improvements involves the establishment of a permanent easement or permanent conversion to rail right-of-way from lands owned by Metro, the Authority will consult with the officials with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity. As it pertains to the connection of wildlife, the Authority acknowledges the ecological importance of the Los Angeles River as well as restoration activities being implemented and planned along the river corridor. A detailed assessment of impacts on wildlife during construction and operation of the HSR project is provided in Section 3.7.6 of this Final EIR/EIS. Mitigation measures to address these impacts are provided in Section 3.7.8 of this Final EIR/EIS.

908-1827

The commenter requests that the Authority should undertake an HSR-funded analysis in collaboration with the 100-Acre Partnership to develop a concept for a grade separation of rail through the entire Taylor Yard area. Refer to Response to Comment 903-1812 in this chapter of this Final EIR/EIS.

Response to Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

908-1828

The commenter summarizes the impact analysis included in Section 3.7.6.3 under Impact BIO #11 (Operation Effects on Wildlife Movement) of the Draft EIR/EIS and recommends a new mitigation measure that would lower the HSR tracks in specific areas for avoidance of bird strikes (with specific reference to least Bell's vireo near Rio de Los Angeles State Park and the Taylor Yard property). The comment does not dispute any impact conclusions made in the Draft EIR/EIS or dispute the effectiveness of impact avoidance and minimization and mitigation measures included in the Draft EIR/EIS that cover impacts on sensitive wildlife species, including BIO-IAMF#11, which requires that the project be designed to be bird-safe in accordance with applicable standards. Further, lowering the track profile in the area may result in additional impacts related to the removal of vegetation and/or bird habitat associated with additional ground disturbance. Although Section 3.7.6.3 has been updated to include new information regarding the status of least Bell's vireo in the HSR Project area, and corresponding measures have been added based on consultations with the United States Fish and Wildlife Service (as part of the project's Endangered Species Act Section 7 consultation), no further revisions to this Final EIR/EIS have been made in response to this comment.

908-1829

The commenter asks if the existing oil pipeline that runs along the Taylor Yard area on the river side of the track would be permanently relocated to San Fernando Boulevard and suggests that this relocation be considered for an Early Action Project. The Authority acknowledges the suggestion that this oil pipeline be considered an Early Action Project and will take this into consideration as the project advances to the next phase of development but cannot do so until the project is funded. The final location of the oil pipelines will be specified during the final design phase of the project. However, In general, utilities are usually not placed under railroad tracks (due to loading and maintenance access) and since there is no available space within the existing railroad right-of-way, the concept at this level of project design is to relocate this pipeline along San Fernando Road. The intent is to locate it within the public right-of-way to the extent feasible. The Authority cannot commit to a final alignment/design until input is received from the utility owners during final design and detailed guidance, in addition to other local criteria, are taken into consideration.

Impacts to public utilities and infrastructure are addressed under Impact PU&E #3 in Section 3.6.6.3 of the Draft EIR/EIS and this Final EIR/EIS. As stated in the EIR/EIS, the Authority would work with utility owners during final engineering design and construction of the HSR Build Alternative to relocate utilities or protect them in place. It is anticipated that all utilities can be relocated and modified within the construction footprint. No revisions to the Final EIR/EIS have been made in response to this comment.

Response to Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

908-1830

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

The comment states that the HSR Project perpetuates the disproportionately high and adverse human health and environmental effects to low-income and minority communities of Cypress Park and Glassell Park, and that the Draft EIR/EIS does not sufficiently analyze the project's significant impacts to these communities nor propose adequate mitigation.

The Authority is required to comply with all federal and state laws and regulations, including implementing mitigation to reduce significant project impacts as identified in the CEQA summary tables at the end of each section of Chapter 3. The project, however, is not required to mitigate existing or legacy environmental impacts related to Union Pacific Railroad and BNSF Railway operations.

Chapter 5, Environmental Justice, addresses environmental justice impacts. As detailed throughout Section 5.9 of this Final EIR/EIS, and summarized in Section 5.7 of this Final EIR/EIS, all populations close to the project footprint, including minority and/or low-income populations, would experience impacts related to transportation, air quality, noise and vibration, parks and recreation, socioeconomics and communities, displacements and relocations, station planning land use and development, and aesthetics and visual impacts. However, the HSR Build Alternative would not result in disproportionately high, adverse effects on low-income and/or minority populations living within the EJ RSA. This is because the percentage of transportation, air quality, noise and vibration, parks and recreation, socioeconomics and communities, displacements and relocations, station planning land use and development, and aesthetics and visual impacts in areas with substantial low-income and/or minority populations is lower than the respective percentages of low-income and/or minority populations in the reference community. Therefore, disproportionate impacts to low-income and/or minority populations would not occur.

908-1831

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

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

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

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

Response to Submission 908 (Brian Baldauf, Mountains Recreation & Conservation Authority (MRCA), August 31, 2020) - Continued

908-1831

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

908-1832

The commenter has expressed concerns regarding the number of trains and overall noise levels at the Bowtie Parcel and Rio De Los Angeles State Park. Consistent with the FRA's High-Speed Ground Transportation Noise and Vibration Impact Assessment Manual (FRA 2012), the noise impacts to Rio De Los Angeles State Park described in Section 3.4, Noise and Vibration, were classified as no impact. This is assessed at the center or average location of potential users within the park. No mitigation is necessary for receptors classified as no impact. The commenter also expressed concerns regarding fencing or sound walls and their aesthetic effect on the Bowtie Parcel and State Park and requests careful consideration of the project's fencing and walls designs. As shown in Section 3.16.6.3, the aesthetic impact to Rio de Los Angeles State Park is analyzed as part of Key Viewpoint (KVP) 16. The visual simulation for KVP 16 (Figure 3.16-19) shows the view of the existing Metrolink rail corridor and the Taylor Yard Parcel/G2 Site and Elysian Park. The HSR Build Alternative would introduce a moderate visual change in the area, but it would be visually compatible with the adjacent rail corridor, resulting in a neutral effect on visual quality or character. Therefore, no mitigation is required.
No changes have been made to the Final EIR/EIS in response to this comment.

908-1833

The commenter expresses concern regarding the *de minimis* finding for impacts to Rio de Los Angeles State Park and requests the inclusion of the Proposed Bowtie Parcel in the analysis. Refer to response to comment 900-1789 contained in this chapter.

In addition, refer to response to comment 908-1831 for a discussion on the inclusion of the Proposed Bowtie Parcel in this Final EIR/EIS.

Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020)

Burbank - Los Angeles - RECORD #888 DETAIL

Status :	Action Pending
Record Date :	9/2/2020
Submission Date :	8/31/2020
Interest As :	Local Agency
First Name :	Ginetta L.
Last Name :	Giovinco
Attachments :	BGPAA -- CHRSA EIR_EIS Comment Letter.PDF (265 kb)

Stakeholder Comments/Issues :

On behalf of the Burbank-Glendale-Pasadena Airport Authority, attached please find comments on the Draft Environmental Impact Report/Environmental Impact Statement for the Burbank to Los Angeles Project Section of the California High-Speed Rail Project.

Please contact me with any questions. We look forward to receiving your responses.

Ginetta L. Giovinco
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August 31, 2020

VIA ELECTRONIC MAIL & U.S. MAIL

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

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

Dear Members of the California High-Speed Rail Authority:

Our office represents the Burbank-Glendale-Pasadena Airport Authority (BGPAA), which operates the Hollywood Burbank Airport (Airport). We write to provide comments on the Draft Environmental Impact Report/Environmental Impact Statement (EIR) (State Clearinghouse No. 2014071073) for the Burbank to Los Angeles Project Section of the California High-Speed Rail Project (Project). The Project spans approximately 14 miles and would provide high-speed rail service between the Burbank Airport Station in Burbank and Los Angeles Union Station in Los Angeles. BGPAA's interests in this matter include ensuring that the Project does not adversely impact the safety and security of the Airport's operations or adversely affect the Airport's visitors, employees, and tenants.

888-1722

As discussed below, the Draft EIR fails to comply with the requirements of the California Environmental Quality Act (CEQA) (Pub. Res. Code § 21000, *et seq*.) and its implementing Guidelines (14 Cal. Code Regs § 15000, *et seq*.) The Draft EIR fails to fully analyze, disclose, and mitigate potential impacts to the Airport, including to the safety of its operations. Based on these defects and inadequacies in the Draft EIR, BGPAA requests that the California High-Speed Rail Authority (CHSRA) suspend any further consideration of the Project until a Draft EIR that fully complies with CEQA is prepared and recirculated for public review and comment. BGPAA objects to any further CHSRA action on the Project until the necessary environmental review has been completed.

Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020) - Continued

888-1722

BGPAA requests that written responses to each of the following comments be provided in accordance with CEQA Guidelines section 15088.

I. <u>The Project Description Is Neither Stable Nor Finite, and Is Incomplete</u>

888-1723

"An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185.) Failure to adequately describe the project undermines CEQA's general purposes, which include informing "governmental decision makers and the public about the potential significant effects of proposed activities" (CEQA Guidelines § 15002(a)(1).) The Draft EIR fails to comply with this requirement.

888-1724

For example, the Draft EIR states that CHSRA "would not acquire temporary construction staging areas through the right-of-way acquisition process. It would be the responsibility of the design-build contractor to negotiate with property owners to secure access and temporary use of their property for staging or laydown areas." (Draft EIR, p. 3.1-9.) First, it is unclear how this statement is reconciled with the statement that "the Authority [CHSRA] would negotiate with property owners to lease the land required for the TCE [temporary construction easement]." (Draft EIR, p. 3.13-49.) Second, it is not clear where construction staging areas will be located if property owners decline to negotiate with the contractor (or CHSRA) or allow any temporary access to or use of their property. While the Draft EIR asserts that it "includes an evaluation of the environmental impacts of various vacant parcels that are near parts of the project that would require construction staging and laydown areas" (Draft EIR, p. 3.1-9), this sidesteps the point. If there is no certainty that CHSRA will acquire the necessary staging areas that were evaluated in the Draft EIR, then other staging areas which have not been environmentally reviewed may be used. This would lead to potential adverse impacts that have not been analyzed, disclosed, or mitigated, in violation of CEQA and based on the unstable project description in the Draft EIR.

888-1725

The Draft EIR also contains incomplete information regarding the Project area and the Airport specifically:

- Page 1-13, Section 1.2.4.1: The northern extent of the Project, such as in the vicinity of the Airport, is also located within the San Fernando Valley, which is distinct from the LA Basin.
- Page 1-28, Section 1.2.4.3: The Airport's Regional Intermodal Transit Center (RITC) has been in operation since 2014.
- Page 1-29, Section 1.2.4.3: There are two official airport-serving Metrolink stations, now referred to by Metrolink as "Burbank Airport - North", which is nearest to the Project corridor and served by the Antelope Valley (AV) Line, and the older "Burbank Airport - South" station, served by the Ventura County (VC) line and closest in proximity to the RITC

888-1725

and current terminal. While the North station requires a shuttle connection, the relationship of this station would change under future conditions with a replacement passenger terminal at BGPAA's preferred location in the northeast quadrant of the Airport, whereby it would be the closer of the two Metrolink stations.

- Page 1-37, Section 1.4.1: The new station referred to is the "Burbank Airport – North" Station.

888-1726

- Page 2-30, Section 2.4.2.2 (Burbank Airport Station Subheading): Please revise the final paragraph: "Option B Refined was designed to locate the platforms closer to the planned relocation of the Hollywood Burbank Airport Terminal…."
- Page 2-36, Section 2.5.1.3, para. 1: The Airport's replacement passenger terminal will not include development of surplus airport property into commercial uses as stated. The adjacent commercial development is under rapid construction and being conducted by a private developer on property that is a separate, stand-alone project.
- Page 2-36, Section 2.5.1.3, para. 2: Please revise "…separate but adjacent commercial project at Hollywood Burbank Airport, using surplus land from the terminal replacement project" to reflect the fact that (i) there is no surplus land related to the proposed replacement passenger terminal project; (ii) the Avion Burbank project is not related to the replacement passenger terminal project; and (iii) it is not Airport property.
- Page 2-44, Section 2.5.2.3 and page 2-54, Figure 2-29: Although not Airport property, it is important to note that the current land associated with a large portion of the station site and its associated surface parking spaces as depicted in Figure 2-29 is undergoing rapidly advancing construction. As a result, the description of the area is no longer accurate.
- Page 2-92, Figure 2-42: The Air Operations Area fence in the southeast quadrant of the Airport (depicted approximately, but not precisely by the dashed orange line in the Figure) will be extended further south upon completion of the replacement passenger terminal, subsequent demolition of the current passenger terminal, and extension of Taxiway C, to approximately the current sequential excavation method-to-cut-and-cover transition line.

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- Page 3.4-23, Section 3.4.4.4: The Airport is a Medium Hub, not a small airport.

888-1728

- App. 3-12D, Sheets 2-9: Many of the Airport's parcels are placed under "Partial Acquisition." Please clarify what this means and whether it is intended to be limited to the purpose of tunneling rights, as no other acquisition is mentioned in the Draft EIR.

II. The Draft EIR's Analysis is Flawed in Several Critical Respects

CEQA is clear: "An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences." (CEQA Guidelines § 15151.) The Draft EIR in its present form fails to comply with this requirement as the analysis is flawed in several critical respects, as discussed below.

A. The Draft EIR Relies on Outdated Information, Including Applicable Regulations

888-1729

The Draft EIR is fundamentally flawed because it relies on baseline data that is already outdated and that does not provide a proper basis for comparison and analysis of Project impacts. By using Year 2015 as the baseline, the Draft EIR sets up a further and ongoing inaccurate analysis for air quality, greenhouse gas (GHG) emissions, and traffic impacts. Realistically, construction is unlikely to start for several years, and the analyses that assume construction will have commenced in 2020 already are outdated and inaccurate. Table 3-3.16 highlights this error; this Table purports to show construction-related air quality emissions during the nine year span from 2020 to 2028. But, practically, no construction will occur in the remaining five months of 2020 for a Project that has not yet been approved. The baseline year and construction and build-out years all should be updated to more accurately reflect the Project status and to close the gap between the year used for analysis and the likely Project construction and build-out years. These revisions are needed to accurately capture potential adverse impacts in multiple environmental impact areas.

888-1730

In addition, the Draft EIR references the 2016–2040 Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (see, e.g., Draft EIR § 1.3.4; Table 3.2-2), but then fails to carry it through for analysis. For example, the Transportation section of the Draft EIR states that a SCAG RTP/SCS baseline year of 2008 "was used for the growth projections in the traffic analysis" because "[t]his was the best available data source when the study was initiated." (Draft EIR, p. 3.2-29.) The leads to the Draft EIR using Year 2015 for "Existing Year" baseline conditions. (see, e.g., Draft EIR, p. 3.2-53.) The Draft EIR cannot use a lengthy delay in preparation of an analysis as a justification for using baseline traffic data that is several years old. Compounding this error, SCAG's 2020-2045 RTP/SCS ("Connect SoCal") was adopted May 7, 2020 and contains further updated information which is not considered; given the subsequent impacts of the COVID-19 pandemic, even this information may require additional consideration and still further revisions.

B. The Draft EIR Fails to Adequately Analyze and Disclose Potential Safety Hazards and Impacts to the Airport

888-1731

The Draft EIR fails to sufficiently analyze and disclose potential impacts to the Airport's operations, including critical airport safety zones. This is a significant deficiency given the nature

888-1731

of the issue and the potential impacts to the health and safety of the public and Airport employees.

888-1732

Draft EIR sections 2.5.2.2 and 2.9.5.3, and Figure 2-44, state that portions of the tunnel through Airport property, particularly outside of "critical airport safety zones," are proposed for a cut-and-cover method of tunneling, and then conclude that there is no potential impact to Airport operations. This conclusion rests on the assumption that Project construction will occur after the Airport's replacement passenger terminal is open. Even under these conditions, the southeast quadrant of the Airport, where cut-and-cover construction is proposed, still is anticipated to be programmed to accommodate some portion of the Airport's landside operations. Therefore, it is not accurate to conclude that there would be no operational impact to the Airport. Rather, there would be a construction-related impact to Airport operations.

888-1733

In addition, the curve of the alignment to bring the right-of-way tangent to the Metrolink Ventura Subdivision likely also would pass near or under the Airport's RITC. This would preclude cut-and-cover in that vicinity, as the Draft EIR states that connectivity with the RITC is a multimodal aim of the Project.

888-1734

This flawed approach to hazards analysis continues with the Draft EIR's analysis of potential hazards resulting from construction-related traffic. The analysis there is incomplete and again relies on assumptions and supposition to conclude that no impacts to Airport safety will occur. The Draft EIR states that the Project:

> "…would not create hazards to airport operations or disrupt air travel. A portion of the [Project] crosses under Runway 8-26, Taxiway D, the proposed extended Taxiway C, and critical airport safety zones at the Hollywood Burbank Airport. For the portion of the tunnel alignment under the Hollywood Burbank Airport runway and taxiways, the preferred method of construction would be the sequential excavation method, which would avoid disruption to runway and taxiways operations during construction. The runway and taxiways systems are expected to remain fully operational during construction because the SEM minimizes surface disruption, which would be limited to the tunnel entry and exit points. These areas are located outside the runway areas and associated safety zones. All areas needed for construction, including the tunnel launch box and staging areas, would be outside of the airfield and critical airport safety zones."

(Draft EIR, p. 3.2-67.)

Stating that the preferred method of construction "would avoid disruption," without more, is simply an unsupported conclusion. In addition, the assertion that "[a]ll areas needed for construction, including the tunnel launch box and staging areas, would be outside of the airfield and critical airport safety zones" is belied by the fact that, as noted above, CHSRA has declined

888-1734

to take any responsibility for ensuring that necessary staging areas are secured. Consequently, it is possible that the anticipated staging areas will not be used and other areas which **do** impact critical Airport safety zones will be used. As a result, there is no support for the Draft EIR's bare assertion that no impacts will occur.

888-1735

Similarly, the Draft EIR's reliance on the Federal Aviation Administration's (FAA) determination that it does not object to the construction of the portion of the tunnel under Runway 8-26, Taxiway D, the proposed extended Taxiway C, and critical airport safety zones (Draft EIR, p. 3.2-68; Draft EIR Appendix 3.11-B-3) is unavailing. The submission of Form 7460-1 is required under 14 C.F.R. Part 77, pursuant to 49 U.S.C. Section 44718. Section 77.5(c) ("Applicability") of the regulations provides that Form 7460-1 will be used to:

- (1) Evaluate the effect of the proposed construction or alteration on safety in air commerce and the efficient use and preservation of the navigable airspace and of airport traffic capacity at public use airports;
- (2) Determine whether the effect of proposed construction or alteration is a hazard to air navigation;
- (3) Determine appropriate marking and lighting recommendations, using FAA Advisory Circular 70/7460-1, Obstruction Marking and Lighting;
- (4) Determine other appropriate measures to be applied for continued safety of air navigation; and
- (5) Notify the aviation community of the construction or alteration of objects that affect the navigable airspace, including the revision of charts, when necessary.

As such, none of the Form's listed uses relates to evaluating proposed below ground structures. Furthermore, Section 77.31(e) (Determinations) of the regulations provides that "[t]he FAA will issue a Determination of No Hazard to Air Navigation when a proposed structure does not exceed any of the obstruction standards and would not be a hazard to air navigation." All of the obstruction determinations in Section 77.17 are *based on height* (e.g., an object would obstruct air navigation if it is taller than "a height of 499 feet AGL at the site of the object"). Thus, a Determination of No Hazard to Air Navigation is not an approval of proposed *below ground* construction projects. The proposed impact avoidance and minimization feature related to this issue likewise focuses only on airspace conflicts and does not address potential hazards to Airport operations from underground construction, nor does the land use consistency analysis address this issue. (Draft EIR, Appendix 2-B-26 through 2-B-27; Draft EIR Appendix 3.1-B-75.)

888-1736

With respect to the proposed Airport station site, a significant portion of land referred to as "underdeveloped… due to the prevalence of surface parking lots surrounding Hollywood Burbank Airport" (see Draft EIR § 3.13.5.1) falls within the Airport's Runway Protection Zone, and

888-1736

thus it is not eligible for additional or more intense development as is required to become fallow as soon as practical with the development of a replacement passenger terminal.

888-1737

The Draft EIR skirts all of these serious safety and hazards issues by proposing "if necessary, coordination with the Hollywood Burbank Airport to amend the current Airport Layout Plan (ALP) for any permanent construction-related facilities required for the [Project], to be submitted to the FAA for approval." (Draft EIR, p. 3.11-70; Draft EIR Appendix 2-B-27.) There are several flaws in this approach. First, this constitutes impermissibly deferred analysis by proposing to figure out if there is a concern or an impact at a later time. Second, the Draft EIR does not discuss or analyze what amendments would be necessary or what impacts might result from the amendments. Third, this approach fails to grapple with what happens if BGPAA objects to an amendment of its ALP or if FAA approval is not granted.

888-1738

The Draft EIR also appears to be internally inconsistent. The Draft EIR states, without any support, that the Project "would not permanently encroach on any areas that have height or land use restrictions associated with the Los Angeles County Airport Land Use Plan (Los Angeles County Airport Land Use Commission 2004). Consequently, there would be no potential for permanent safety hazards resulting from interference with airport safety." (Draft EIR, Appendix 3.11-B-2.) Yet, the land use consistency analysis finds in many cases that the Project is *incompatible* with other elements of that same Land Use Plan (see, e.g., Draft EIR, Appendix 3.1-B-13) and with the Airport Land Use Commission's Review Procedures, including as it relates to safety and security. (Draft EIR, Appendix 3.1-B-71.)

888-1739

The Draft EIR similarly avoids any meaningful analysis of potential electromagnetic interference (EMI) and electromagnetic fields (EMF) impacts on Airport operations. The Draft EIR correctly notes that the Airport is considered a sensitive receptor (Draft EIR, p. 3.5-18) and that the applicable threshold of significance provides that no interference with Airport communications equipment is allowed (Draft EIR, p. 3.5-16). Yet, the Draft EIR contains no substantive analysis to ensure that this threshold is not exceeded. Instead, the Draft EIR states only that "[p]otential impacts would be avoided through implementation of EMI/EMF-IAMF [impact avoidance and minimization feature]#2, which would provide the necessary third-party coordination…." (Draft EIR, p. 3.5-30.) The Draft EIR then admits to deferred analysis, stating, that "[d]uring the planning stage through system design, [CHSRA] would perform additional EMC [electromagnetic compatibility]/EMI safety analyses…." (Draft EIR, p. 3.5-30.) Performing studies at a future time, with no stated benchmark standards or means of ensuring that there will be no impacts to the Airport's safe operations, constitutes impermissible deferred analysis and mitigation.

888-1740

Finally, please also note that as an FAR Part 139-certificated airport receiving Federal Grants-in-Aid, BGPAA is required to maintain a Wildlife Hazard Mitigation Plan (WHMP) that is itself based on a 12-month-long Wildlife Hazard Assessment (WHA), last completed in 2014 and 2012, respectively. Based upon these studies, the current condition of the site proposed for the

Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020) - Continued

888-1740

Burbank Airport Station, as well under Avion development post-project conditions, has not been deemed incompatible with Federal guidelines for land uses surrounding airports with respect to wildlife habitats. The FAA requires off-airport proponents of potentially incompatible land uses to notify the local airports and the FAA of their plans and to present evidence demonstrating that the land use will not cause a wildlife hazard to aviation.

C. The Draft EIR Fails to Properly Analyze and Disclose Potential Transportation Impacts

888-1741

The Draft EIR appears to use level of service (LOS) selectively, leading to a lack of clear analysis and disclosure of impacts. For example, Impact TR #1 uses LOS methodology for the entirety of the impact analysis, only to state as follows in the CEQA conclusion: "This threshold is not applicable to CEQA because LOS is no longer the performance standard for transportation impacts for CEQA." (Draft EIR, p. 3.2-57.) This same approach and impact conclusion statement appears in Impact TR #2 and Impact TR #3. As a result, the Draft EIR fails to adequately disclose potential adverse impacts from the Project. If LOS is not used for any impact conclusions, why was it used to analyze the impact?

888-1742

In addition, some corrections to the Draft EIR are needed:

- Page 3.2-46, Section 3.2.5.4, para. 2: There are two Airport Metrolink stations: "Burbank Airport - North" on Metrolink's AV Line and "Burbank Airport - South" on Metrolink's VC Line.
- Page 3.2-46, Section 3.2.5.4, para. 3: The B-6 Parcel is a former portion of the Lockheed Martin Corporation's manufacturing property. The eastern part is not owned by BGPAA nor is it the preferred site of the proposed Replacement Passenger Terminal project. Certain statements contained in this section are factually incorrect.
- Page 3.2-47, Section 3.2.5.5: The Burbank Airport Station ("Burbank Airport - North") on the Antelope Valley Line is currently open and in service.
- Page 3.2-49, Section 3.2.6.2, Aviation Subsection: The Avion Burbank commercial development referenced is "separate but adjacent to Hollywood Burbank Airport." The parcel is owned by a private developer who is well underway with the project.

888-1743

III. The Draft EIR Must Be Revised and Recirculated

CEQA requires that an EIR be recirculated when "significant new information is added to the EIR" prior to certification of the document. (CEQA Guidelines § 15088.5.)

Here, given the substantial new information that must be included in the Draft EIR to comply with CEQA, and to ensure that CHSRA complies with its mandate under CEQA to ensure

RICHARDS WATSON GERSHON

888-1743

that its EIR "demonstrate[s] to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action" (CEQA Guidelines § 15003(d)), the EIR must be revised and recirculated for public review and comment.

BGPAA therefore objects to any further action on the Project until the necessary and proper environmental review has been completed and the public has been provided a meaningful opportunity to comment on the revised EIR.

IV. Written Request for Notices

888-1744

Pursuant to Public Resources Code section 21092.2(a), BGPAA intends that this letter serve as a written request for a copy of all notices that may be issued or filed related to this Project or any part or component thereof. Please direct all such notices to me at the address on this letter.

Very truly yours,

Ginetta L. Giovinco

cc (by email only):
Frank R. Miller, Executive Director, BGPAA
John T. Hatanaka, Senior Deputy Executive Director, BGPAA
Patrick J. Lammerding, Deputy Executive Director
Planning & Development, BGPAA
Mark D. Hardyment, Director, Transportation & Environmental Affairs, BGPAA
Aaron K. Galinis, AICP, Airport Planner, BGPAA
Terence Boga, General Counsel, BGPAA

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RICHARDS WATSON GERSHON

Response to Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020)

888-1722

The commenter states the Draft EIR/EIS fails to fully analyze, disclose, and mitigate potential impacts to the Hollywood Burbank Airport. The commenter specifically requests that written responses to each of the individual comments submitted in the comment letter be provided in accordance with CEQA Guidelines Section 15088. Impacts related to the Hollywood Burbank Airport are discussed in Sections 3.2 Transportation; 3.3 Air Quality; 3.4 Noise and Vibration; 3.5 EMI/EMF; 3.8 Hydrology; 3.9, Geology, Soils, Seismicity, and Paleontology; 3.11 Safety and Security; 3.12 Socioeconomics and Communities; 3.13 Station Area Planning, Land Use and Development; 3.16 Aesthetics and Visual Quality; 3.19 Cumulative; and Chapter 5 Environmental Justice. Chapters 1 and 2, and Sections 3.2, 3.4, 3.11, and 3.13 have been revised in response to comments from the BGPAA. Refer to Responses to Comments 888-1723 to 888-1744 for detail on how the Final EIR/EIS has been revised. Per 14 CCR Section 15151, an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Consistent with 14 CCR Section 15151, the analysis included in the HSR Burbank to Los Angeles Project Section EIR evaluated the environmental effects based on the project design plans provided in Volume 3 of the Draft EIR/EIS. The Authority will make the Final EIR/EIS (including responses to all comments received on the Draft EIR/EIS) available to the public at least 30 days prior to certification of the Final EIR by the Authority Board of Directors. The Final EIR/EIS will be published on the Authority's website and the BGPAA will receive a Notice of Availability of the Final EIR/EIS at the time of publication. Additionally, the Authority will continue to coordinate with the BGPAA during final design as well as during construction to minimize impacts to the airport facility and operations.

888-1723

The commenter asserts that the Draft EIR/S does not adequately describe the project, and provides examples of where they found incomplete information to support this comment.

The Draft EIR/EIS meets NEPA and CEQA requirements for level of detail in the proposed action. Under either statute, a description of a proposed project and project alternatives in an EIR/EIS should be brief, but sufficient detail must be available to fully analyze environmental impacts and propose mitigation measures.

For all of the Tier 2 CEQA/NEPA documents for individual project sections within the California High-Speed Rail system, the Authority has followed a consistent process to advance the definition of the project from the program level description in the Tier 1 documents to a project level definition.

As with all HSR project section EIR/EIS documents, Chapter 2 describes detailed elements for the project, including text and graphic descriptions of vehicles, stations, grade separations, signaling, alignment and track, and where these project elements would be located within the project section limits. Chapter 2 also includes a detailed narrative and mapped description of the location of proposed HSR infrastructure along the alignment, on local roadways, and at the station sites.

In order to provide detailed information about which parcels may be impacted by the project, Appendix 3.1-A includes all parcels that may be partially or fully acquired in a geographically -specific format to show what land is needed to construction, operate, and maintain the project.

Whereas Chapter 2 is intended to describe what the project includes and where it will be located, it is not intended to provide environmental impact analysis. Potential environmental impacts associated with construction and operation of the project described in Chapter 2 can be found in Sections 3.1-3.19 and Chapters 4.0, 5.0, 6.0 and 7.0 of the EIR/EIS.

Response to Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020) - Continued

888-1724

The commenter noted a discrepancy in the description of the Authority's role in determining temporary construction easement areas. Revisions to this Final EIR/EIS have been made in response to this comment. Section 3.13.6.3 was revised to delete the sentence stating that the Authority would lease the land from property owners for construction staging areas. As Section 3.1.3.6 states, this would be the responsibility of the future contractor. Chapter 2 was revised to state that if other areas not identified within this Final EIR/EIS are required for construction staging in the future, subsequent NEPA and CEQA analysis would be required.

888-1725

The commenter states that several items are incomplete regarding the project area and the airport. The commenter's bullet points are addressed as follows within the Final EIR/S:

Section 1.2.4.1: The description of the project area was revised to include the San Fernando Valley.

Section 1.2.4.3: The commenter seems to suggest that the airport's Regional Intermodal Transit Center (RITC) is incorrectly described. Section 1.4.1 accurately describes the RITC as having been in operation since 2014. No revisions were made.

Section 1.2.4.3: The name of the Hollywood Burbank Airport Station has been updated to the most recent name: Burbank Airport –South. The Burbank Airport –North Station was added to the description of lines serving the airport.

888-1726

The commenter states that several items are incomplete regarding the project area and the airport. The commenter's bullet points are addressed as follows within the Final EIR/S:

Section 2.4.2.2 (Burbank Airport Station Subheading): The sentence describing the refinement of Option B was revised to describe the relocation of the airport terminal as "planned".

Section 2.5.1.3, paragraph 1: The sentence regarding the development of surplus airport property into commercial uses was deleted.

Section 2.5.1.3, paragraph 2: The sentence the development of surplus airport property into commercial uses was revised to delete the reference to "surplus land".

Section 2.5.2.3: The Authority acknowledges that the private Avion development project is currently under construction. Section 2.5.2.3 and Figure 2-29 accurately describe the proposed project, and were not revised. Section 3.19 of this Final EIR/S has been updated to describe the current status of the Avion project.

Figure 2-42: The figure was revised to include more detailed information, including the future border of the air operations area.

888-1727

Per the commenter's request, the text in Section 3.4.4.4 of this Final EIR/EIS has been revised to clarify Hollywood Burbank Airport as a medium-hub general aviation airport.

888-1728

The comment requests clarification on what "Partial Acquisition" means.

A "partial acquisition" means only a portion of the parcel would be purchased and the owner would retain ownership of the remaining portion. Parcels affected by tunneling rights are referred to as permanent subsurface easements in the Final EIR/EIS.

Subsurface easements would be required on parcels in the vicinity of the Burbank Airport Station where tunneling rights are needed as shown in Appendix 3.1-A.

Response to Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020) - Continued

888-1729

The commenter states that the Draft EIR is fundamentally flawed because it relies on baseline data that is already outdated (2015) and does not provide a proper basis for the comparison and analysis of project impacts. As the technical analysis for the Burbank to Los Angeles Project Section Transportation Technical Report (Authority 2019) was initiated in 2015, that year provided the appropriate baseline conditions for the analyses conducted to support the Draft EIR/EIS, including the Burbank to Los Angeles Project Section Air Quality and Global Climate Change Technical Report (Authority 2020). For the Air Quality and GHG analysis, the 2015 analysis was used to evaluate operational emissions with and without the project. The EIR also presents other scenarios, with and without the project, including 2029 and 2040. As shown in Section 3.3, Table 3.3-25 of this Final EIR/EIS, for the year 2040, operation of the project would continue to result in a net benefit in air quality, even with increased vehicle efficiency. Additionally, for the construction analysis, the annual project emissions would remain the same regardless of what year the analysis is presented for since AQ-IAMF#4 would require the use of construction equipment that would meet the Tier 4 engine requirements, which would have the same emission factors regardless of the year of construction. Similarly, traffic impacts during construction would remain the same regardless of what year construction starts because the duration of any lane closures and/or detours would be the same based upon the durations of construction phases shown in Table 2-18 of the EIR/EIS. The construction period of 2020 to 2028 assumed in the analysis was based on the schedule presented in the Authority's 2016 Business Plan which was the most current plan at the time the analysis was performed. No revisions to this Final EIR/EIS have been made in response to this comment.

888-1730

The commenter expresses concern related to the existing year baseline traffic conditions and growth projections. The 2040 RTP/SCS was current at the time of the transportation technical analysis conducted for the environmental documentation. The use of data available at the time the technical studies commenced is consistent with the requirements of the baseline for CEQA analysis. The baseline of data is a snapshot of existing and future baseline conditions that is defined at the start of the environmental analysis, and the transportation analysis is synched with the assumptions of the overall environmental review effort.

According to the Transportation Technical Report (Authority 2020), the HSR Build Alternative would provide benefits to the regional transportation system by reducing vehicle trips on the freeways through the diversion of intercity trips from road trips to HSR. This is a net benefit to transportation and traffic operations because a reduction in VMT helps maintain or potentially improve the operating conditions of regional roadways. This reduction in future vehicle trips would potentially improve the LOS of the regional roadway system and reduce the overall VMT compared with existing conditions and compared with the No Project Alternative. While the 2040 RTP/SCS was the current data available at the time of the transportation analysis, the improvements to LOS and VMT would still be expected to occur using more recent 2020-2045 RTP/SCS because of the continued population and employment growth projected in the SCAG region.

The long-term effects of the COVID-19 pandemic on travel and traffic conditions are not known at this time. As described in the TTR (Authority 2020), the transportation analysis uses pre-COVID traffic data and traffic counts taken in 2015, when societal restrictions on commercial and other activity did not exist. Therefore, the existing traffic volumes used for the analysis are conservative and appropriate. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020) - Continued

888-1731

The commenter expresses a concern that the Draft EIR fails to sufficiently analyze and disclose potential impacts to Hollywood Burbank Airport's operations, including critical airport safety zones. As stated in Section 3.11.6.3, a portion of the HSR project crosses under Runway 8-26, Taxiway D, the proposed extension of Taxiway C, and critical airport safety zones at Hollywood Burbank Airport. This section of the HSR project would be constructed by utilizing the sequential excavation method (SEM), working under the runway and taxiway systems to avoid any airside operations impacts. The runway and taxiway systems are expected to remain fully operational during construction because the SEM minimizes surface disruption, which would be limited to the tunnel entry and exit points, located outside of the critical airport safety zones.

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

888-1732

The commenter states that the description of construction impacts does not take into account airport landside operations. Section 2.5.2.2 and 2.9.5.3 contain an accurate description of the SEM and cut-and-cover tunnels, and were not revised. However, Section 3.2.6.3 was revised to clarify that although construction of the cut-and-cover tunnel would not have an impact on airfield operations, it would have an impact on landside operations. Per Section 3.2.4.2, TR-IAMF#2, the Authority will work with the airport to develop a Construction Transportation Plan to minimize this impact.

888-1733

The commenter states that the cut-and-cover portion of the alignment near the Metrolink Ventura Subdivision would be precluded because it passes near or under the Airport's Regional Intermodal Transportation Center because connectivity with the Regional Intermodal Transportation Center is a multimodal aim of the HSR project. The proposed cut-and-cover structure would require a portion of the Regional Intermodal Transportation Center parking structure to be removed pre-construction and to be replaced post-construction. The HSR project would support multimodal development with future connections to other modes of transportation. However, this design is preliminary in nature and details will be determined during final design.

Current design is preliminary and based on 15% level of completion. The proposed HSR tunnel/cut and cover structure recognizes temporary impact to the RITC facility with the southeast portion temporarily impacted and inaccessible during construction. The final design solution, per ongoing coordination with the BGPAA, will also address and resolve conflicts with the project's interface with airport facilities.

Response to Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020) - Continued

888-1734

The commenter expresses concern with the analysis in the Draft EIR/EIS as it relates to airport safety and hazards associated with staging areas. As stated in Section 3.11.6.3 of this Final EIR/EIS, to address the potential for disruption of airfield and airspace operations at Hollywood Burbank Airport as a result of operation of the HSR Build Alternative, the HSR Build Alternative incorporates SS-IAMF#5, which requires the Authority to provide BGPAA with designs and/or information for submittal to the Federal Aviation Administration (FAA) as required by the Code of Federal Regulations (C.F.R.), Title 14, Part 77, to ensure the design of permanent HSR features within and adjacent to the boundary of Hollywood Burbank Airport would not adversely affect imaginary surfaces as defined in 14 C.F.R. Section 77.9 (b). SS-IAMF#5 also requires the implementation of measures required by the FAA to ensure continued safety of air navigation during HSR Build Alternative operation pursuant to 14 C.F.R Section 77.5 (c) and, if applicable, coordination with the Burbank-Glendale-Pasadena Airport Authority to amend the current Airport Layout Plan to depict permanent above-ground facilities required for the HSR project, to be submitted to the FAA for approval. Text has been added to Section 3.11.6.3 of this Final EIR/EIS to further clarify how the HSR Build Alternative's below-ground construction activities do not obstruct air navigation or cause hazards related to operation.

888-1735

The commenter states that the Draft EIR/EIS relies on the FAA's lack of objection to constructing the portion of the tunnel under Runway 8-26, Taxiway D, the proposed extended Taxiway C, and critical airport safety zones. As stated in Section 3.11.6.3, to address the potential for disruption of airfield and airspace operations at Hollywood Burbank Airport as a result of operation of the HSR Build Alternative, the HSR Build Alternative incorporates SS-IAMF#5, which requires the California High-Speed Rail Authority (Authority) to submit designs and/or information to the FAA as required by the Code of Federal Regulations (C.F.R.), Title 14, Part 77, to ensure the design of permanent HSR features within and adjacent to the boundary of Hollywood Burbank Airport does not adversely affect imaginary surfaces as defined in 14 C.F.R. Section 77.9 (b). SS-IAMF#5 also requires the implementation of measures required by the FAA to ensure continued safety of air navigation during HSR Build Alternative operation pursuant to 14 C.F.R Section 77.5 (c) and, if applicable, coordination with Burbank-Glendale-Pasadena Airport Authority to amend the current Airport Layout Plan (ALP) to depict permanent above-ground facilities required for the HSR project, to be submitted to the FAA for approval. In addition, SS-IAMF#6 requires continued coordination with the FAA and the Burbank-Glendale-Pasadena Airport Authority to avoid conflicts due to overlapping construction schedules and future operations at the Hollywood Burbank Airport as design of the HSR Build Alternative progresses. SS-IAMF#6 would require coordination to support full operations of the runway and taxiway systems r during construction. Text has been added to Section 3.11.6.3 of this Final EIR/EIS to clarify how the Authority is consulting with the FAA to ensure that below-ground construction activities do not obstruct air navigation or cause hazards related to airfield operations.

It should be noted that the FAA was not a cooperating agency at the time of the Draft EIR/EIS publication; however, pursuant to its September 3, 2020, letter to the Authority, the FAA is a cooperating agency under 40 C.F.R. Sec. 1501.6. The FAA is a cooperating agency for this Final EIR/EIS and has been consulted on the project, including the tunnel construction under Hollywood Burbank Airport.

Response to Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020) - Continued

888-1736

The comment states that a significant portion of land referred to as "underdeveloped… due to the prevalence of surface parking lots surrounding Hollywood Burbank Airport" falls within the Airport's Runway Protection Zone; thus, it is not eligible for additional or more intense development as it is required to become fallow as soon as practical with the development of a replacement passenger terminal. This comment is noted for the record. While many of the surface parking lots surrounding the Hollywood Burbank Airport are within the Airport's Runway Protection Zone, a large portion of the underdeveloped land referred to in this statement is either currently being developed with the Avion Burbank Project or would be part of the planned replacement terminal site. Refer to Appendix 3.11-B, Airport Obstructions, in this Final EIR/EIS for a discussion on how the HSR Project would avoid conflicts with the Hollywood Burbank Airport Runway Protection Zone and the height restrictions established by Federal Aviation Administration regulations at 14 C.F.R. Part 77.

888-1737

The commenter states that the Draft EIR/EIS does not address safety and hazards issues related to airport operations and defers this analysis to a later time. Section 3.11.6.3 of this Final EIR/EIS has been revised to clarify the actions to be taken if an amendment is needed, including the process to be taken to obtain FAA approval of the amendment. More specifically, Section 3.11.6.3 was revised to state that, if applicable, the Authority will work with the Burbank-Glendale-Pasadena Airport Authority to amend the current Airport Layout Plan consistent with FAA's Standard Operating Procedures, specifically Standard Operating Procedure No. 2. In addition to the Airport Layout Plan amendment, as stated in SS-IAMF#5, the Authority will provide designs and/or information to the BGPAA for their submittal to the FAA as required by C.F.R, Title 14, Part 77.

888-1738

The commenter states that there are internal inconsistencies in the Draft EIR/EIS related to consistency with the Los Angeles County Airport Land Use Plan and the land use consistency analysis. Section 3.11 of this Final EIR/EIS has been revised to support the statement that the HSR project "would not permanently encroach on any areas that have height or land use restrictions associated with the Los Angeles County Airport Land Use Plan." In addition, this Final EIR/EIS has been revised to clarify that even though the HSR project may result in inconsistencies with elements of the Los Angeles County Airport Land Use Plan, those inconsistencies do not include permanent encroachment on any areas that have height restrictions or land use restrictions.

Response to Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020) - Continued

888-1739

The commenter objects to what they refer to as a "deferred analysis" of potential impacts at Hollywood Burbank Airport and a reliance on the provisions in EMI/EMF-IAMF#2 to ensure less than significant impacts.

The design of the Burbank to Los Angeles Project Section is based on a preliminary design that is sufficient to disclose environmental impacts but will become more detailed as the design progresses. The current level of design is considered to be 15% of what will be required for project construction. The analysis of EMI/EMF impacts in the EIR/EIS is based on the level of design currently available.

In the case of Hollywood Burbank Airport, the California Environmental Quality Act (CEQA) threshold is "interference with any sensitive equipment." There are three main sources of potential interference with airport communications and aviation systems from the California High-Speed Rail (HSR) Project: the on-board and wayside communications systems, the train traction power systems, and arcing between the train pantograph and the overhead contact system (OCS).

Hollywood Burbank Airport operates a range of communications and radio navigation systems that are potentially susceptible to EMI/EMF. Certain potential HSR project impacts (for example, related to the magnetic fields from the traction power system or from the project's communications radios) are addressed directly and compared against the specific impact thresholds identified in Section 3.5 of the EIR/EIS. However, the Federal Aviation Administration (FAA) considers any interference with radio-navigation aids to be unacceptable and will require a direct demonstration of no impact, not an analysis that shows EMI levels will be below a particular numeric value. EMI/EMF-IAMF#2 provides the mechanism to satisfy this requirement. Radio frequency (RF) emissions due to arcing are believed to be the most consequential source in terms of potential interference at the frequencies used by airport communications and aviation systems. The requirements set forth in EMI/EMF-IAMF#2 provide the procedures that will ensure impacts will be avoided and minimized through compliance with international standards and state and federal regulations.

To ensure that is the case, the Authority will produce an Electromagnetic Compatibility Program Plan (EMCPP) during project planning and implementation to ensure

888-1739

compatibility with all radio systems operated by Hollywood Burbank Airport. Potential impacts would be identified and avoided through implementation of EMI/EMF-IAMF#2, which would provide all necessary coordination with the FAA and BGPAA through the EMCPP and Implementation Stage Electromagnetic Capability Program Plan (ISEP). Through the ISEP, the Authority would monitor field conditions to determine if electromagnetic compatibility (EMC) issues arise and provide the necessary coordination with affected third parties and the construction contractor to resolve any problems.

It is also not the case that the future analysis or studies would be conducted "…with no stated benchmark standards…" EMI/EMF-IAMF#2, through the EMCPP and ISEP, would provide for:

1. Coordination with FAA's Spectrum Engineering office and airport staff.
2. Identification of existing airport radio systems.
3. Selection of systems to prevent EMI/EMF with identified airport uses and incorporation of these requirements into bid specifications used to procure radio systems.
4. Monitoring and evaluation of system performance for compatibility with airport systems. The benchmark for compatibility is no interference with the airport communications or radio-navigation aids.

The Authority has had ongoing coordination with the BGPAA and FAA regarding potential effects of the HSR Build Alternative's effects on the Hollywood Burbank Airport. The Authority held an EMI/EMF workshop with the BGPAA and the FAA on April 14, 2021 to discuss the EMI/EMF evaluation at and in the vicinity of Hollywood Burbank Airport.

Response to Submission 888 (Ginetta L. Giovinco, Richards Watson Gershon, August 31, 2020) - Continued

888-1740

The commenter summarizes federal requirements of the Hollywood Burbank Airport related to wildlife hazards, specifically noting that the Federal Aviation Administration requires off-airport proponents of potentially incompatible land uses to notify the local airports and the Federal Aviation Administration of their plans and to present evidence demonstrating that the land use will not cause a wildlife hazard to aviation. The Burbank Airport Station, which is situated primarily underground, and the aboveground project features including a station building, pick-up and drop-off facilities, a transit center, surface parking, and stormwater capture and drainage facilities, would not attract wildlife because the Burbank Airport Station would be located in a dense urban setting along an existing rail corridor and would not create any habitat or conditions that would be more favorable to wildlife than the existing conditions, and would therefore not cause a wildlife hazard to aviation. No revisions to this Final EIR/EIS have been made in response to this comment.

888-1741

Refer to Standard Response BLA-Response-Section 3.2 TRAN-02: Permanent Traffic Impacts.

The commenter expresses concern related to the use of LOS in the transportation impact analysis. Refer to Standard Response BLA-Response-Section 3.2 TRAN-02: Permanent Traffic Impacts. Both LOS and VMT metrics were provided in the transportation analysis for the project. Per current CEQA guidelines, LOS metrics cannot be used to determine the significance of impacts under CEQA. Vehicle delay and LOS metrics are provided in the transportation analysis to show patterns of traffic impacts for review by local agencies and for NEPA analysis. For CEQA impacts, the VMT metric is analyzed, and this is provided as a regionwide value for each analyzed project year, as the mobility network must be evaluated as a whole in the statewide HSR model to acknowledge shifts between auto and rail modes and travel routes and provide the resulting regional VMT change. As this is a joint EIR / EIS and LOS is required for NEPA analysis, it was included to characterize the transportation setting and consequences of the action and determine the significance of the action as a whole. No revisions to this Final EIR/EIS have been made in response to this comment.

888-1742

The commenter provided four corrections to be incorporated into Section 3.2 of the Final EIR/EIS. The Authority appreciates the commenter's input and the corrections provided have been included in Section 3.2 of this Final EIR/EIS.

888-1743

The commenter states that the Draft EIR must be recirculated given that there is substantial new information related to Hollywood Burbank Airport. According to CEQA Guidelines Section 15088.5, recirculation of an EIR prior to certification is required when “significant new information” is added after the draft EIR is circulated for public review.

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

Revisions to the EIR/EIS between the Draft EIR/EIS circulated for public review and this Final EIR/EIS clarify and amplify information provided in the Draft EIR/EIS and do not introduce significant new information under CEQA Guidelines Section 15088.5 5 or 40 C.F.R. 1502.9(c)(1)(ii), and do not meet the supplementation requirements under NEPA. Recirculation of the Draft EIR/EIS is not required.

888-1744

The commenter requests that they receive a copy of all notices issued or filed regarding the project. In response to this comment, the commenter was added to the outreach database. The commenter was already included in the distribution list in Chapter 10 of this Final EIR/EIS. The commenter has also been added to the Authority’s list of recipients for copies of the CEQA Notice of Determination and the NEPA Notice on Limitation of Claims.

Submission 647 (Ginetta Giovinco, RWG Law, June 19, 2020)

Burbank - Los Angeles - RECORD #647 DETAIL

Status :	Action Pending
Record Date :	6/19/2020
Submission Date :	6/19/2020
Interest As :	Business and/or Organization
First Name :	Ginetta
Last Name :	Giovinco

Stakeholder Comments/Issues :

647-1235

Good Morning,

May I get a copy of the presentation from yesterday's Open House, or will they be posted on the website?

Thank you.

Ginetta L. Giovinco
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Response to Submission 647 (Ginetta Giovinco, RWG Law, June 19, 2020)

647-1235

The commenter requested a copy of the Information Session presentation. On June 19, 2020, the commenter was directed to the online archive with the video recording of the session. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 727 (Ray W. Wolfe, San Bernardino County Transit Authority, July 28, 2020)

Burbank - Los Angeles - RECORD #727 DETAIL

Status :	Action Pending
Record Date :	7/28/2020
Submission Date :	7/28/2020
Interest As :	Local Agency
First Name :	Ray
Last Name :	Wolfe

Stakeholder Comments/Issues :

Good Afternoon,

Attached, please find San Bernardino County Transportation Authority's comment letter on the Draft EIR / EIS.

Don't hesitate to reach out to Carrie Schindler, Director of Transit & Rail Programs, at 909-884-8276 or cschindler@gosbcta.com<mailto:cschindler@gosbcta.com> with any questions. 727-1012

Thank you,

Ashley Izard
Deputy Clerk of the Board
1170 West Third Street, 2nd Floor
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909.884.8276 | Office 727-1013

[cid:image004.png@01D2EE5E.F39A7C10] 727-1014

July 27, 2020

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

To Whom It May Concern:

Thank you for the opportunity to provide the California High-Speed Rail Authority (CHSRA) with comments related to the scope and content of the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for the Burbank to Los Angeles Project Section of the California High-Speed Rail (HSR) Project.

DEIR/EIS Section 2 – Alternatives, S2.5.2.8 discusses the impact of the CHSRA alignment on the Metrolink Central Maintenance Facility (CMF), see below for report extract. Also, alignment drawings MY-D1102 to MY-D1104 show the proposed modifications to the CMF that allow for the CHSRA alignment. These show significant works to the throat tracks, storage and maintenance tracks, utilities, and roads. However, the CHSRA's proposed design of the CMF modifications appear to show a reinstatement of all the current (existing condition) CMF facilities, including the provision for a wheel truing facility and two future storage tracks. The design drawings do not appear to be consistent with the S2.5.2.8 statement that these facilities are being relocated elsewhere. I also noted that there is approximately $45 million in the CHSRA capital cost estimate as budget for the work to the CMF.

There are several issues that SBCTA may be concerned with as outlined below:

1. Due to the discrepancy, CHSRA should confirm that all existing facilities at Metrolink's CMF are being reinstated as part of the CHSRA design presented in the Preliminary Engineering for Project Definition (PEPD), specifically drawing numbers MY-D1102 to MY-D1104. 727-1015
2. CHSRA should clarify the statement in Section 2.5.2.8 that relates to the wheel truing and progressive maintenance bays within Metrolink's CMF? Does the CHSRA proposed CMF design allow for the inclusion of a wheel truing facility and future storage tracks (as shown in the PEPD drawings) or do these facilities need to be relocated to another Metrolink maintenance facility as stated in Section 2.5.2.8? If all CMF facilities are not being replaced, the DEIR should address impacts, and corresponding mitigation, related to the relocation of Metrolink maintenance activates to other maintenance facilities such as the Eastern Maintenance Facility in San Bernardino County. This should be done for both interim displacement of maintenance activities as well as permanent displacement of maintenance activities if that is going to occur. 727-1016
3. As the SCORE Program is currently being implemented, it should be considered as part of the baseline scenario when looking at impacts. To what extent has the CHSRA design of Metrolink's CMF taken into account the requirements for implementation of Metrolink's future service improvements such as the SCORE Program? Has CHSRA considered and allowed for future growth in Metrolink service and the associated maintenance requirements? 727-1017
4. If certain maintenance facilities need to be relocated to another Metrolink facility, (and assuming that Metrolink and its member agencies have not already been consulted and agreed to the location of this), has the operational impact of this change been analyzed in terms of Metrolink's ability to maintain existing operations and its ability to implement and operate its planned service improvements? If so, the associated mitigation requirements should be included in the final document. 727-1018
5. How will the temporary impacts to Metrolink's CMF be accommodated and will this require the diversion of Metrolink trains to other maintenance and storage facilities? If so, has the operational impact of this been considered and discussed with Metrolink and has any required temporary modifications to Metrolink/Southern California Regional Rail Association infrastructure been identified?

chsra200722-cs

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Submission 727 (Ray W. Wolfe, San Bernardino County Transit Authority, July 28, 2020) - Continued

DEIR/EIS – Section 2 Alternatives - "S2.5.2.8 Modifications to Metrolink Central Maintenance FacilityModifications to Metrolink Central Maintenance Facility Metrolink's CMF is the major daily servicing location and maintenance facility in the region. The HSR Build Alternative proposes reconfiguration of the various yard and maintenance facilities within the CMF to accommodate HSR, ***while maintaining as many of the existing yard operations as possible.*** *Figure 2-27 in Section 2.5.2.2 is a schematic diagram of the existing CMF and the proposed changes, which include new mainline-to-yard track connections; partial demolition of the existing maintenance shop; a revised roadway network with reconfigured parking areas; and track relocation shifts and construction to provide additional storage capacity. Additionally, several facilities would need to be relocated or rebuilt within the CMF, including a train-washing/ reclamation building, a yard pump house, and two service and inspection tracks. Utilities would also need to be relocated with the CMF, including domestic and fire water; underdrains and reconstructed catch basins; power facilities; fueling facilities and storage tanks; and sanitary sewer systems. The* ***proposed design would not be able to accommodate wheel truing operations or progressive maintenance bays; these would be relocated to another Metrolink facility.*** *All* ***other facilities and infrastructure would remain in place****. The construction work at the CMF would be phased to minimize the disruption to existing operations and to maintain the key operational facilities."*

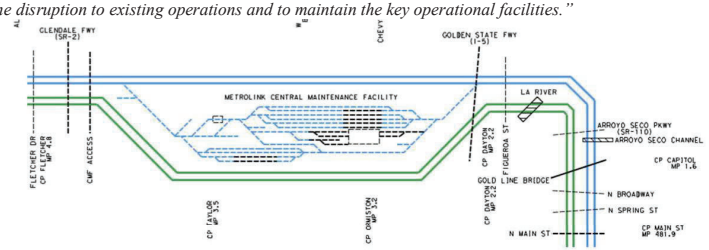

Figure 1 - Extract from PEPD Schematic Drawing GE-D6501 (shows impact and final condition)

Regards,

Raymond W. Wolfe
Executive Director

Cc: Frank Navarro, City of Colton
Julie McIntyre, City of Barstow
Darcy McNaboe, City of Grand Terrace
Larry McCallon, City of Highland
Alan Wapner, City of Ontario
John Dutrey, City of Montclair
Ray Marquez, City of Chino Hills
John Valdivia, City of San Bernardino
Stephanie Wiggins, Chief Executive Officer, Metrolink

Response to Submission 727 (Ray W. Wolfe, San Bernardino County Transit Authority, July 28, 2020)

727-1012

The commenter notes that the PEPD drawings seem to show a reinstatement of all facilities at the Metrolink CMF, whereas Section 2.5.2.8 describes facilities that would have to be relocated. Based on comments received from stakeholders on the Draft EIR/EIS, the HSR Build Alternative design at the CMF has been refined to reconfigure the various yard and maintenance facilities within the CMF to accommodate HSR.

727-1013

The commenter requests confirmation that all existing facilities at Metrolink's CMF are being reinstated, referring specifically to maintenance facility sheets MY-D1102 and MY-D1104 of Volume 3.5 of this Final EIR/EIS. As stated in Section 2.5.2.8 of this Final EIR/EIS, the HSR Build Alternative includes new mainline-to-yard track connections, partial demolition and reconstruction of the existing maintenance shop, a revised roadway network with reconfigured parking areas, and track relocations. Additionally, several facilities would need to be relocated within the CMF, including a progressive maintenance and wheel trueing facility, a train-washing/reclamation building, a yard pump house, and two service and inspection tracks. Utilities would also need to be relocated within the CMF, including domestic and fire water, storm drain facilities including underdrains and reconstructed catch basins, power facilities including emergency generator and electric substation, hazardous materials storage, fueling facilities and storage tanks, oil water separator, and sanitary sewer systems. The construction work at the CMF would be phased to minimize the disruption to existing operations.

727-1014

See Response to Comment 1012, contained in this chapter of this Final EIR/EIS.

727-1015

The commenter states if all Metrolink's Central Maintenance Facility (CMF) structures are not being replaced, the EIR/EIS should address impacts and corresponding mitigation related to the relocation of Metrolink's maintenance activities to other maintenance facilities.

The design at CMF has been revised to maintain the majority of existing yard operations with the exception of slightly reduced train storage capacity. The new storage tracks would have slightly less capacity than the existing storage tracks, with a decrease of 5 units; however, these units could be accommodated at the existing Keller Yard between US-101 and Cesar Chavez Avenue. With the revised design, maintenance activities would not need to be relocated to other maintenance facilities.

The discussion of the CMF facility and operations has been updated in Section 2.5.2 of this Final EIR/EIS in response to this comment.

727-1016

The commenter states that the SCORE Program be considered as part of the baseline scenario. The Authority acknowledges the development of the SCORE Program, but it should be noted that the program had not been adopted at the time the design at the CMF was initially developed for the HSR project; therefore, it is not considered in the baseline conditions evaluated in the EIR/EIS. The design at the CMF was initially developed to maintain existing yard operations and train storage capacity. However, in recent coordination between the Authority and SCRRA's operations and engineering staff, the Authority acknowledges that Metrolink prefers that the HSR project accommodate the SCORE Program so that trains can use a south end mainline to yard connection to support all inbound and outbound rail traffic. This, combined with additional rail vehicle storage capacity, would accommodate the improvements planned under the SCORE Program. The Authority will continue to coordinate with Metrolink to further assess the needs of the program and the Authority's ability to accommodate it. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 727 (Ray W. Wolfe, San Bernardino County Transit Authority, July 28, 2020) - Continued

727-1017

The commenter has requested clarification regarding the operational impact of relocating certain maintenance facilities from the existing CMF. The Authority did examine operational impacts and assumed in the analysis that Metrolink would utilize a system-wide equipment cycle and have the ability to move trains periodically to the San Bernardino Line and/or the IEOC Line so that they could access the Eastern Maintenance Facility (EMF) as part of normal operations. The relocation of certain functions to the EMF, or to have new equipment installed at the EMF prior to relocation, was considered. For example, a new wheel truing machine could be installed at the EMF prior to decommissioning the unit at the CMF. It should be noted that the current concept does show an alternative location of the wheel truing machine on the CMF property (refer to the plans provided in Volume 3.5 –General, Maintenance Facilities, and Trackside Access of this Final EIR/EIS). Other maintenance functions or equipment would be relocated or built new prior to the relocation or replacement at the CMF.

727-1018

The commenter has requested clarification of how temporary impacts on Metrolink's CMF will be accommodated and if it would require the diversion of Metrolink trains to other maintenance and storage facilities. Given the current preliminary level of design and considering that the construction phasing/duration analysis has not yet been developed, it is assumed that impacts to the CMF would require the temporary diversion of trains to other facilities for the purposes of maintenance and storage. With the exception of wheel truing, it would be possible to accommodate existing operations at the CMF during construction, but with anticipated schedule delays, as there may be temporary restrictions on yard movements resulting in a diversion of train traffic around phased limits of construction. The Authority did examine operational impacts and assumed in the analysis that Metrolink would utilize a system-wide equipment cycle and have the ability to move trains periodically to the San Bernardino Line and/or the IEOC Line so that they could access the Eastern Maintenance Facility (EMF) as part of normal operations.

Submission 873 (Lijin Sun, South Coast Air Quality Management District, August 29, 2020)

Burbank - Los Angeles - RECORD #873 DETAIL

Status :	Action Pending
Record Date :	8/31/2020
Submission Date :	8/29/2020
Interest As :	Local Agency
First Name :	Lijin
Last Name :	Sun
Attachments :	LAC200526-01 DEIR-EIS California High-Speed Rail Project Burbank to Los Angeles Project Section_20200828.pdf (274 kb) [873]_[Sun]_ProjectEmail_[083120]_Original.pdf (253 kb)

Stakeholder Comments/Issues :

Dear Mr. McLoughlin,

Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the Proposed California High-Speed Rail Project Burbank to Los Angeles Project Section (SCH No.: 2014071073) (South Coast AQMD Control Number: LAC200526-01).

Thank you,
Lijin Sun, J.D.
Program Supervisor, CEQA IGR
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Direct: (909) 396-3308
Fax: (909) 396-3324
*Please note that the building is closed to the public.
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873-1591

South Coast
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SENT VIA E-MAIL: August 28, 2020
Burbank_Los.Angeles@hsr.ca.gov
Mark.Mcloughlin@hsr.ca.gov
Mark A. McLoughlin, Director
California High-Speed Rail Authority, Environmental Services
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071

Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the California High-Speed Rail Project – Burbank to Los Angeles Project Section (Proposed Project) (SCH No.: 2014071073)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The High-Speed Rail Authority (Authority) is the CEQA Lead Agency for the Proposed Project. The following comments include recommended revisions to the air quality analysis, air dispersion modeling, Impact Avoidance and Minimization Features (IAMFs), and mitigation measures that the Authority should include in the Final EIR/EIS.

Based on the Draft EIR/EIS, the High-Speed Rail (HSR) system is an important transportation strategy. It provides intercity travel in California on electrically powered, high-speed railroad tracks of more than 800 miles[1]. The Proposed Project is one of 12 project sections in the HSR system and spans 14 miles between Hollywood Burbank Airport in the City of Burbank and Los Angeles Union Station in the City of Los Angeles. Construction of the Proposed Project will occur over a nine-year period from 2020-2028[2]. It is anticipated that operations will begin in 2029[3].

Based on a review of the Draft EIR/EIS and supporting technical documents, South Coast AQMD staff has seven main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. CEQA Air Quality Analysis for Regional Construction Impacts: In the Draft EIR/EIS, the Authority used 10 miles (one-way) of truck trip length to quantify the Proposed Project's hauling emissions from exporting contaminated soil and construction materials. Since most of the off-site landfill disposal facilities identified in the Draft EIR/EIS are located more than 10 miles away (one-way), and it is likely that contaminated soil may need to be disposed at a permitted hazardous disposal facility that is located in a different county or state, using a one-way trip length of 10 miles likely underestimated the Proposed Project's hauling emissions, particularly NOx emissions. Additionally, the Authority quantified the Proposed Project's construction emissions from removing 80,000 cubic yards of contaminated soil but did not explain how this amount was developed. The Authority identified that 47 properties within the

[1] Draft EIR/EIS. Summary. Page S-1.
[2] *Ibid.* Section 3.3 Air Quality. Page 3.3-38.
[3] *Ibid*. Page 3.2-41.

Submission 873 (Lijin Sun, South Coast Air Quality Management District, August 29, 2020) - Continued

873-1591

Proposed Project's footprint have known or suspected contamination. It is not clear if removal of contaminated soil for those 47 properties was in addition to or included in 80,000 cubic yards and should be clarified in the Final EIR/EIS.

873-1592

2. CEQA Air Quality Analysis for Regional Operational Impacts: In the Draft EIR/EIS, the Authority quantified emissions reductions from aircraft due to reduced air travel in Southern California and included those reductions to determine the level of significance for the Proposed Project's operational air quality impacts. Since the Proposed Project is one of three Southern California sections of the HSR system, it is not clear if the Proposed Project in itself will cause a reduced demand in air travel and decrease in aircraft emissions. Therefore, it is not appropriate to include emissions reductions for all of Southern California to analyze the Proposed Project's operational air quality impacts in the Draft EIR/EIS. The Authority should quantify the portion of aircraft emissions that will be reduced because of the Proposed Project in the Final EIR/EIS.

873-1593

3. CEQA Air Quality Analysis for Localized Operational Impacts: In the Draft EIR, the Authority states that, due to the Proposed Project's design constraints, existing operational Metrolink Central Maintenance Facility (CMF) yard activities will be required to be relocated. However, the Draft EIR does not provide additional information or analysis of the environmental impacts associated with this direct impact of the Proposed Project. The Authority should provide more information on the proposed relocation site, the activities which would occur at this relocation site, the site's proximity to sensitive receptors (e.g. residents, schools, etc.) and analyze the localized air quality impacts from activities that will be relocated from the Metrolink CMF in the Final EIR/EIS.

873-1594

4. Air Dispersion Modeling Parameters: The air dispersion modeling performed in the Draft EIR/EIS and technical supporting documents placed sensitive receptors locations along the fence line boundary, used the non-default regulatory option, and modeled emissions from construction equipment as an "Open Pit" source. The Authority should provide additional information to justify these modeling parameters in the Final EIR/EIS.

873-1595

5. Recommended Revisions to Existing Impact Avoidance and Minimization Features: Based on an estimated construction timeframe of 2020 to 2028, the Authority will require the use of off-road Tier 4 construction equipment and an average fleet mix of on-road haul trucks that meet or exceed model year 2010 engine standard. However, it is possible that the construction could be delayed beyond these timeframes. Therefore, to achieve additional emission reductions to the maximum extent feasible, South Coast AQMD staff recommends that the Authority strengthen the existing IAMFs in the Final EIR/EIS by requiring the use of zero-emissions (ZE) off-road construction equipment and ZE or near-zero emissions (NZE) material delivery and soil import/export haul trucks during construction. The Authority should also require truck routes be clearly marked with trailblazer signs.

873-1596

6. Additional Recommended Air Quality Mitigation Measures: In the Draft EIR/EIS, the Authority proposes to purchase emissions credits from South Coast AQMD to offset the Proposed Project's construction emissions. South Coast AQMD staff looks forward to further discussions with the Authority on the approach and mechanism to demonstrate that General

873-1596

Conformity requirements have been met. In the Final EIR/EIS, the Authority can and should require additional mitigation measures to achieve direct reductions of construction emissions, especially for regional pollutants, before purchasing offset credits. It is important to note that emissions credits can be used to offset regional impacts, but not localized impacts. The Authority should develop performance standards to require the use of zero-emissions or near-zero emissions trucks during construction (e.g., material delivery trucks and soil import/export) in the Final EIR/EIS. Additional recommended mitigation measures during operation are also included in the attachment.

873-1597

7. South Coast AQMD Rules and Permits: In the Draft EIR/EIS, the Authority will require the use of concrete batch plants, conduct gas monitoring and collection, and abandon active oil and gas wells within 200 feet of the proposed rail tracks. The Final EIR/EIS should discuss how the Proposed Project will comply with South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil[4] and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Containments[5]. The Authority should consult with South Coast AQMD's Engineering and Permitting staff to determine if any permits from South Coast AQMD will be required. If permits from South Coast AQMD are required, the Authority should identify South Coast AQMD as a Responsible Agency in the Final EIR/EIS.

873-1598

In conclusion, the Draft EIR/EIS likely underestimated the Proposed Project's construction emissions and overestimated the Proposed Project's air quality benefits by considering aircraft emissions occurring in Southern California. South Coast AQMD staff recommends that the Authority revise the air quality analysis in the Final EIR/EIS.

South Coast AQMD staff is available to work with the Authority to address any air quality questions that may arise from this comment letter. Please feel free to call me at (909) 396-3176 if you have questions or wish to discuss our comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment
SN/IM/VT/JW:LS/AM
LAC200526-01
Control Number

[4] South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: http://www.aqmd.gov/docs/default-source/rule book/reg-xi/rule-1166.pdf.
[5] South Coast AQMD. Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Containments. Accessed at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf.

Submission 873 (Lijin Sun, South Coast Air Quality Management District, August 29, 2020) - Continued

873-1599

ATTACHMENT

South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment

The Authority analyzed the Proposed Project's regional and localized construction air quality impacts after incorporating six construction air quality Impact Avoidance Minimization Features (IAMFs) as project requirements. The Proposed Project's mitigated regional nitrogen oxide (NOx) and carbon monoxide (CO) emissions would be significant and unavoidable at 482.11 pounds/day (lbs/day) and 708.97 lbs/day, respectively[6]. The Authority performed air dispersion modeling to analyze the Proposed Project's localized construction air quality impacts and found that concentrations would not exceed the air quality standards, except for nitrogen dioxide (NO2). The Proposed Project would result in a maximum 1-hour NO2 concentration of 643 micrograms per cubic meter (µg/m^3) during construction[7], which exceeds the 1-hour National Ambient Air Quality Standard of 188 µg/m^3 and the 1-hour California Ambient Air Quality Standard (CAAQS) of 339 ug/m^3. The Proposed Project would also result in a maximum annual NO2 concentration of 77.3 µg/m^3 during construction[8], which exceeds the annual CAAQS of 57 µg/m^3. The Authority also conducted a Health Risk Assessment (HRA) for the Proposed Project's construction activities, which would result in a cancer inhalation risk of 2.6 in one million[9], which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk[10].

The Authority quantified the statewide and regional operational emissions for the medium (46.8 million) and high (56.8 million) ridership scenarios with a planning horizon of 2040[11]. Both direct emissions from HSR station operations and fugitive dust from train operations and indirect emissions from regional vehicle travel, aircraft, and electricity generation were calculated in the Draft EIR/EIS[12]. The Authority found that operation of the HSR system would result in a net regional decrease in emissions for all criteria pollutants because of reductions in regional vehicle and air travel[13]. Therefore, the HSR system would have a beneficial air quality impact under CEQA[14].

South Coast AQMD staff's detailed comments on the CEQA air quality impacts analysis and air dispersion modeling are provided as follows.

873-1600

[6] Draft EIR/EIS. Section 3.3. Pages 3.3-49 to 54.
[7] *Ibid.* Page 3.3-61 to 63.
[8] *Ibid.*
[9] *Ibid.*
[10] South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.
[11] Draft EIR/EIS. Section 3.2 Air Quality. Page 3.3-28.
[12] *Ibid.* Section 3.3. Pages 3.3-62 to 71.
[13] *Ibid.*
[14] *Ibid.*

1. CEQA Air Quality Analysis for Regional Construction Impacts

Truck Trip Length

The Authority reduced the default one-way truck trip length from 20 miles to 10 miles to quantify the Proposed Project's construction emissions from hauling construction materials and importing or exporting soil. In the Public Utilities and Energy Section of the Draft EIR/EIS, the Authority identified five off-site disposal landfill facilities for solid waste collections: Burbank Landfill Site No. 3 in the City of Burbank, Scholl Canyon Landfill in the City of Glendale, Chiquita Canyon Landfill in the community of Castaic in Los Angeles County, Calabasas Landfill in the community of Agoura Hills in Los Angeles County, and Sunshine Canyon Landfill in the community of Sylmar in the City of Los Angeles[15]. As shown in Table A below, the majority of the landfill facilities are more than 10 miles away (one-way). Additionally, as discussed in Comment No. 2, the Proposed Project will require the removal of contaminated soil. Depending on the type of contamination, contaminated soil may not be accepted at any of these off-site disposal landfill facilities identified in the Draft EIR/EIS and may need to be disposed at a permitted hazardous disposal facility outside Los Angeles County with a one-way trip length that is likely longer than 39 miles. During the earth moving construction phase, which spans over a five-year period between 2020 and 2025, an estimated 398,750 one-way truck trips would be required for hauling 3,190,000 cubic yards of soil[16]. Using a one-way truck trip length of 10 miles likely underestimated the Proposed Project's construction emissions. Therefore, South Coast AQMD staff recommends that the Authority identify the permitted hazardous disposal facility that the Proposed Project will use to dispose contaminated soil, disclose it in the Final EIR/EIS, and re-calculate the Proposed Project's construction emissions from haul truck trips based on the appropriate one-way trip length.

Table A: Trip Lengths to Landfills Identified in the Draft EIR/EIS

Off-site Disposal Landfill Facilities Identified in the Draft EIR/EIS	One Way Truck Trip Length from the Proposed Project (Hollywood Burbank Airport)	One Way Truck Trip Length from the Proposed Project (Los Angeles Union Station)
Burbank Landfill No. 3	6 miles	12 miles
Scholl Canyon Landfill	15 miles	13 miles
Chiquita Canyon Landfill	28 miles	39 miles
Calabasas Landfill	26 miles	32 miles
Sunshine Canyon Landfill	15 miles	26 miles

Source: South Coast AQMD staff generated using Google Maps. Date: July 2020.

Removal of Contaminated Soil

In the Draft EIR/EIS, the Authority quantified the Proposed Project's construction emissions from removing 80,000 cubic yards of contaminated soil but did not explain how this amount of soil export was developed. Additionally, in the Hazards and Hazardous Materials Section of the Draft EIR/EIS, the Authority lists 47 properties within the Proposed Project's footprint that present a

[15] *Ibid.* Section 3.6 Public Utilities and Energy. Page 3.6-18.
[16] *Ibid.* Air Quality Technical Report, Appendix A: *CalEEMod Construction Emissions*. CalEEMod Annual Run "HSR B-LA Earthmoving Phase". PDF page 1417.

Submission 873 (Lijin Sun, South Coast Air Quality Management District, August 29, 2020) - Continued

873-1600

potential environmental concern (PEC) due to known or suspected site contamination. Six of them are listed as "high-risk", which is defined as a property where "additional investigation and review indicated contamination is present and likely to be encountered during construction, and abatement of building materials will be required prior to construction"[17]. It is unclear if additional amount of contaminated soil will need to be removed for cleaning up those 47 properties or is included in 80,000 cubic yards of contaminated soil for export. The Authority should include additional information to clarify that in the Final EIR/EIS. If more than 80,000 cubic yards of contaminated soil will need to be removed, the Authority should re-calculate the Proposed Project's construction emissions for hauling from soil export in the Final EIR/EIS.

2. CEQA Air Quality Analysis for Regional Operational Impacts

In the Draft EIR/EIS, the Authority quantified statewide and regional operational emissions associated the HSR system based on the medium and high ridership scenarios[18]. Although emissions from electrical demands are expected to increase, vehicle and air travel are expected to be reduced[19]. As such, the Authority found that the HSR system will result in net decreases in criteria pollutants emissions, both statewide and regionally[20]. For example, in the regional air quality analysis, the Authority found that, with implementation of the Proposed Project (based on a high ridership scenario), changes to air travel in Southern California would result in NOx emissions reductions ranging from 254 tons/year to 465 tons/year[21].

The California HSR system includes more than 800 miles of rail tracks throughout the state, connecting the major population centers of Sacramento, the San Francisco Bay Area, the Central Valley, Los Angeles, the Inland Empire, Orange County, and San Diego[22]. It is appropriate to assume that the HSR system will, collectively, reduce the demand for air travel and include aircraft emissions reductions in the first-tier, programmatic-level environmental documents[23].

The Proposed Project involves a 14-mile rail track for freight and passenger services and has a limited geographic scale between Hollywood Burbank Airport in the City of Burbank and Los Angeles Union Station in the City of Los Angeles. The Authority is also developing two other project sections of the HSR system (the Palmdale to Burbank Project Section and the Los Angeles to Anaheim Project Section) in Southern California. While the statewide HSR system and the three Southern California project sections of the HSR system are expected to provide an alternative transportation mode to air travel and reduce aircraft emissions, there is not enough information in the Draft EIR/EIS to support that the Proposed Project in itself will cause a reduced demand in intrastate or regional air travel. Including reductions in aircraft emissions from changes to air travel for all of the Southern California project sections may have improperly credited the Proposed Project with emissions reductions that are independent of the Proposed Project. Therefore, South Coast AQMD staff recommends that the Authority quantify the portion of emissions from air travel that will be reduced because of the Proposed Project and include those emissions in the Proposed Project's operational emissions profile to be compared to South Coast AQMD's regional air

873-1601

[17] *Ibid.* Section 3.10 Hazardous Materials and Wastes. Table 3.10-6. Pages 3.10-32 and 33.
[18] *Ibid.* Section 3.3. Pages 3.3-62 to 71.
[19] *Ibid.* Section 3.2 Transportation. Page 3.2-81.
[20] *Ibid.* Section 3.3. Page 3.3-62 to 71.
[21] *Ibid.* Air Quality and Global Climate Change Technical Report. Pages 7-14 to 7-17.
[22] *Ibid.* Page S-1.
[23] *Ibid.* Section 3.2. Page 3.2-81.

873-1601

quality CEQA significance thresholds for operation to determine the level of significance. This recommendation facilitates the intended use of this EIR/EIS as a second-tier, project-level environmental document[24].

3. CEQA Air Quality Analysis for Localized Operational Impacts

873-1602

In the Draft EIR/EIS, the Authority explains that, as a part of the Proposed Project, the existing Metrolink CMF will be redesigned to accommodate both the HSR operations and most existing CMF yard operations. The new configuration will require that wheel turning operations and progressive maintenance bays be relocated to another Metrolink facility; however, the Authority did not identify a relocation site or analyze the localized air quality impacts from operation of the relocated railyard activities at the relocation site in the Draft EIR/EIS[25]. Since the relocation of wheel turning operations and progressive maintenance bays from the Metrolink CMF to another Metrolink facility is directly related to the Proposed Project, the environmental impacts associated with the activities occurring at the relocation site should be analyzed and disclosed to the public in the Final EIR/EIS. The Authority should provide more information regarding the relocation site, including the proximity to nearby sensitive receptors (e.g. residents, schools, etc.), and analyze the localized air quality impacts from the relocated activities for comparison to South Coast AQMD's CEQA air quality localized significance thresholds or the National Ambient Air Quality Standards and the California Ambient Air Quality Standards in the Final EIR/EIS[26]. In addition, if Metrolink train activity is altered to accommodate this new maintenance location in the system, then any potential air quality impacts from that relocation should be analyzed along with other project air quality impacts, and mitigated if found to be significant.

4. Air Dispersion Modeling Parameters

873-1603

To analyze the Proposed Project's localized construction air quality impacts, the Authority performed project-specific air dispersion modeling in the Draft EIR/EIS. South Coast AQMD staff recommends that the Authority revise the modeling parameters based on the following comments.

- In Appendix G: *Health Risk Assessment Technical Report*, the Authority explains that sensitive receptors were set at the Proposed Project's fence line boundary extending out to 1,000 feet (300 meters) at a 25-meter spacing[27]. Upon review of the air dispersion modeling files, South Coast AQMD staff found that sensitive receptors were only placed along the fence line boundary. This placement may not have captured the maximum predicated receptors and the peak concentrations. Therefore, South Coast AQMD staff recommends that the Authority use a uniform Cartesian grid with a spacing of 100 meters or less for all distances less than 1,000 feet[28], or provide information to demonstrate that the peak concentrations were identified with placement of discrete receptor locations along the fence line boundary.

[24] *Ibid.* Page S-4.
[25] *Ibid.* Chapter 2 Alternatives. Page 2-48.
[26] South Coast AQMD. *Localized Significance Thresholds*. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.
[27] *Ibid.* Appendix G: *Health Risk Assessment Technical Report*. Pages 3-3 to 3-4.
[28] South Coast AQMD. "Modeling Guidance for AERMOD". Accessed at: http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance

Submission 873 (Lijin Sun, South Coast Air Quality Management District, August 29, 2020) - Continued

873-1604

- In the air dispersion model, the Authority used the non-regulatory default option "FASTAREA". South Coast AQMD staff recommends using the regulatory default option or providing justification for using the non-regulatory default FASTAREA option.

873-1605

- Emissions from construction equipment were modeled as an "Open Pit" source. The "Open Pit" source in AERMOD is used to model emissions from surface coal mines and rock quarries. South Coast AQMD staff recommends the Authority provide additional information to explain how the emission characteristics of off-road construction equipment are representative of those of an "Open Pit" source to justify the use of this source in the air dispersion model.

5. Recommended Revisions to Existing Impact Avoidance and Minimization Features

In the Draft EIR/EIS, the Authority is committed to six air quality and 12 transportation Impact Avoidance and Minimization Features (IAMFs). Among them, AQ-IAMF#4 requires that all off-road diesel construction equipment meet Tier 4 engine requirements. AQ-IAMF#5 requires that all on-road construction haul trucks consist of an average fleet mix of model year 2010 or newer engine standards. Transportation (TR) IAMF #7 requires the use of construction truck routes away from sensitive receptors[29]. Since the Proposed Project will result in significant and unavoidable construction air quality impacts, particularly for NOx and CO, to further reduce construction emissions and their impacts on nearby sensitive receptors, South Coast AQMD staff recommends that the Authority strengthen the existing measures AQ-IAMF#4, AQ-IAMF#5, and TR-IAMF#7 in the Final EIR/EIS.

873-1606

AQ-IAMF#4 Reduce Criteria Exhaust Emissions from Off-Road Construction Equipment

The Proposed Project is anticipated to be constructed over a nine-year period beginning in 2020; however, it is likely that construction could be delayed beyond this timeframe and cleaner off-road construction equipment may become available as the construction schedule extends further out. Therefore, it is recommended that the Authority require the use of Tier 4 Final or cleaner construction equipment, electric powered construction equipment (also see Comment No. 6 for more details), and include additional information on implementation and monitoring of this IAMF in the Final EIR/EIS.

873-1607

South Coast AQMD staff's recommended revisions AQ-IAMF#4 are in strikethrough and underline as follows.

- All heavy-duty off-road construction diesel equipment used during the construction phase would meet Tier 4 Final or newer engine requirements, which includes the use of zero-emission off-road construction equipment. Include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any construction activities. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. Require periodic reporting and provision of written

[29] Draft EIR/EIS. Appendix 2-B *Impact Avoidance and Minimization Features*. Pages 2-B-2 through 2-B-3 and 2-B-11.

873-1607

construction documents by construction contractor(s) to ensure compliance and conduct regular inspections to the maximum extent feasible to ensure compliance.

AQ-IAMF#5 Reduce Criteria Exhaust Emissions from On-Road Construction Equipment

In the Draft EIR/EIS, the Authority is committed to requiring an average fleet mix of 2010 model year trucks or newer. This means that not all haul trucks for the Proposed Project will need to meet or exceed 2010 model year engine standards. South Coast AQMD staff recommends that all on-road trucks used to haul construction materials and soil import/export meet and/or exceed 2010 model year engine standard. However, it is possible that the construction could be delayed beyond the construction timeframe of 2020 to 2028 that the Draft EIR/EIS used to estimate the Proposed Project's construction emissions. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of zero-emissions (ZE) and near-zero-emissions (NZE) trucks such as the Advanced Clean Trucks Rule[30] and the Heavy-Duty Low NOx Omnibus Regulation[31], ZE and NZE trucks will become increasingly more available to use. Since the Proposed Project's construction air quality impacts would be significant and unavoidable, particularly for NOx emissions, the Authority should require the use of ZE or NZE trucks during construction. (Also see Comment No. 6 for more details).

873-1608

South Coast AQMD staff's recommended revisions to AQ-IAMF#5 are in strikethrough and underline as follows.

- Prior to issuance of construction contracts, the Authority would incorporate the following material hauling truck fleet mix requirements into the contract specifications:

  At a minimum, all on-road trucks used to haul construction materials, including fill, ballast, rail ties, and steel would consist of ~~an average fleet mix of equipment~~ model year 2010 or newer haul trucks that meet California Air Resources Board's (CARB) 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions. ~~but no less than the average fleet mix for the current calendar year as set forth in the CARB's EMFAC 2014 database~~. […]. Alternatively, require the use of ZE or NZE material delivery and soil import/export haul trucks during construction.

873-1609

TR-IAMF#7: Construction Truck Routes

South Coast AQMD staff's recommended revisions TR-IAMF#7 is in strikethrough and underline as follows.

[30] California Air Resources Board. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.

[31] CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox.

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873-1609

- The Contractor shall deliver all construction-related equipment and materials on the appropriate truck routes and shall prohibit heavy-construction vehicles from using alternative routes to get to the site. Truck routes would be established away from schools, day care centers, and residences, or along routes with the least impact if the Authority determines those areas are unavoidable. This measure shall be addressed in the CTP. The Authority should also require that truck routes are clearly marked with trailblazer signs, so that trucks will not enter areas where sensitive receptors are present.

6. Additional Recommended Air Quality Mitigation Measures

Construction-related Air Quality Mitigation Measures

In the Draft EIR/EIS, the Authority will require implementation of one air quality mitigation measure (AQ-MM#1). AQ-MM#1 would require the purchase of emission offsets through an anticipated contractual agreement between the Authority and South Coast AQMD to reduce the Proposed Project's construction NOx emissions[32].

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CEQA requires that the Lead Agency considers mitigation measures to minimize significant adverse impacts (CEQA Guidelines Section 15126.4) and that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. The Authority can and should require additional air quality mitigation measures to generate direct reductions of emissions from regional pollutants before purchasing offset emission credits. The Authority can and should incorporate emissions reductions outside the area of the Proposed Project by requiring the use of cleaner construction equipment and heavy-duty haul trucks that will be used for material delivery trucks and soil import/export. Specifically, the Authority can and should require the use of ZE or NZE trucks, such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr).

Technology is transforming the transportation sector at a rapid pace. ZE construction equipment and cleaner trucks, such as ZE or NZE trucks that meet the newly approved CARB standard or optional low NOx standard, will become increasingly more feasible and commercially available as technology advances. If using ZE or NZE construction equipment and heavy-duty haul trucks as a mitigation measure to reduce the Proposed Project's construction air quality impacts is not feasible today, they could become feasible in a reasonable period of time during the Proposed Project's nine-year construction period, which may be extended into the future due to funding uncertainty for the Proposed Project[33] (CEQA Guidelines Section 15364). Therefore, it is recommended that the Authority develop a process with performance standards to require and/or accelerate the deployment of the lowest emission technologies and the utilization of ZE or NZE construction equipment and heavy-duty haul trucks (CEQA Guidelines Section 15126.4(a)). The Authority can and should develop the performance standards as follows or any other comparable standards in the Final EIR/EIS.

[32] *Ibid*. Section 3.3. Page 3.3-54.
[33] *Ibid*. Page S-1.

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- Develop a minimum amount of ZE or NZE construction equipment and heavy-duty haul trucks that the Proposed Project must use during each year of construction to ensure adequate progress. Include this requirement in the Proposed Project's construction bid documents.
- Establish a construction contractor(s)/truck operator(s) selection policy that prefers construction contractor(s)/truck operator(s) who can supply ZE or NZE construction equipment and heavy-duty haul trucks. Include this policy in the Request for Proposal for selecting construction contractor(s)/truck operator(s).
- Develop a target-focused and performance-based process and timeline to review the feasibility to implement the use of ZE or NZE construction equipment and heavy-duty haul trucks during construction. Include this process and timeline in the Construction Management Plan.
- Develop a project-specific process and criteria for periodically assessing progress in implementing the use of ZE or NZE construction equipment and heavy-duty haul trucks during construction. Include the assessment process and criteria in the Construction Management Plan.

Implementation of the Proposed Project contributes to Basin-wide NOx emissions. Requiring the use of ZE or NZE construction equipment and heavy-duty haul trucks supports South Coast AQMD's efforts to attain state and federal air quality standards as outlined in the 2016 Air Quality Management Plan (AQMP), specifically an additional 45 percent reduction in NOx emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment[34,35]. Requiring the use of ZE or NZE construction equipment and heavy-duty haul trucks also fulfills the Lead Agency's legal obligation to mitigate the Proposed Project's significant construction air quality impacts and complies with CEQA's requirements for mitigation measures.

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Operation-related Air Quality Mitigation Measures

- Require at least six percent of the Proposed Project's 5,210 vehicle parking spaces (or 313 parking spaces) at the Burbank Airport Station and the Los Angeles Union Station[36] to provide electric vehicle (EV) charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles to plug-in. The Authority should quantify emissions from generating additional electricity for the EV charging stations and combine them with emissions from energy consumption for the electrified trains to analyze the Proposed

[34] South Coast AQMD. March 3, 2017. *2016 Air Quality Management Plan.* Accessed at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.
[35] Based on the air dispersion modeling that was performed to analyze the Proposed Project's localized air quality impacts, the Lead Agency found that the Proposed Project would result in NO2 concentrations that would exceed the federal 1-hour standard and the state annual standard during construction. (Draft EIR/EIS. Chapter 3. 3 Air Quality. Page 3.3-61 and 62). In the Appendix I: *Health Effects* of the 2016 AQMP, South Coast AQMD staff discussed a 2016 health study by the U.S. EPA. The study found that when adults with asthma are exposed to NO2 at the 100 parts per billion (ppb) to 300 ppb concentrations, they experienced an increase in airway responsiveness, which in asthmatics can worsen symptoms and reduce lung function. (Page I-54. Accessed at: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf).
[36] *Ibid*. Page S-14.

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873-1611

Project's operational air quality impacts in the Final EIR/EIS (See Comment No. 2 above). The Authority should also evaluate and identify sufficient power available for passenger vehicles and supportive infrastructures (e.g., EV charging stations) in Section 3.6, Public Utilities and Energy, of the Final EIR/EIS, where appropriate.

- Consider implementation of Smart Parking systems to reduce vehicle idling time in parking facilities.
- Collaborate with local and regional agencies and transportation providers to develop incentive programs or other methods to increase ridership.

7. South Coast AQMD Rules and Permits

In the Draft EIR/EIS, the Authority will require the use of concrete batch plants outside the Burbank Airport Station area during construction (AQ-IAMF#6), implement best management practices for gas monitoring, including installation of gas venting, collecting, and monitoring systems during construction [Geologic Resources (GEO)-IAMF #3], and abandon any active oil and gas wells within 200 feet of the Proposed Project's rail tracks [Safety and Security (SS)-IAMF#4]. The Authority should include discussions on how construction activities will comply with South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil[37] and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Containments[38].

873-1612

873-1613

It is also recommended that the Authority consult with South Coast AQMD's Engineering and Permitting staff to determine if any permits from South Coast AQMD will be required, and if compliance with other applicable South Coast AQMD rules is required and should be discussed in the Air Quality Section of the Final EIR/EIS. In the event that the Proposed Project requires permits from South Coast AQMD, the Authority should identify South Coast AQMD as a Responsible Agency in the Final EIR/EIS. Any assumptions used in the Final EIR/EIS will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

873-1614

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Authority provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR/EIS. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned

[37] South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: http://www.aqmd.gov/docs/default-source/rule book/reg-xi/rule-1166.pdf.

[38] South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Containments. Accessed at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf.

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analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Authority makes the finding that the recommended revisions to the existing IAMFs and additional mitigation measures are not feasible, the Authority should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR/EIS (CEQA Guidelines Section 15091).

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Burbank - Los Angeles - RECORD #873 DETAIL

Status :	Action Pending
Record Date :	8/31/2020
Submission Date :	8/31/2020
Interest As :	Local Agency
First Name :	Lijin
Last Name :	Sun
Attachments :	LAC200526-01 DEIR-EIS California High-Speed Rail Project Burbank to Los Angeles Project Section_20200828.pdf (274 kb)

Stakeholder Comments/Issues :

Dear Mr. McLoughlin,

Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the Proposed California High-Speed Rail Project Burbank to Los Angeles Project Section (SCH No.: 2014071073) (South Coast AQMD Control Number: LAC200526-01).

Thank you,
Lijin Sun, J.D.
Program Supervisor, CEQA IGR
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SENT VIA E-MAIL: August 28, 2020
Burbank_Los.Angeles@hsr.ca.gov
Mark.Mcloughlin@hsr.ca.gov
Mark A. McLoughlin, Director
California High-Speed Rail Authority, Environmental Services
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071

Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the California High-Speed Rail Project – Burbank to Los Angeles Project Section (Proposed Project) (SCH No.: 2014071073)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The High-Speed Rail Authority (Authority) is the CEQA Lead Agency for the Proposed Project. The following comments include recommended revisions to the air quality analysis, air dispersion modeling, Impact Avoidance and Minimization Features (IAMFs), and mitigation measures that the Authority should include in the Final EIR/EIS.

Based on the Draft EIR/EIS, the High-Speed Rail (HSR) system is an important transportation strategy. It provides intercity travel in California on electrically powered, high-speed railroad tracks of more than 800 miles[1]. The Proposed Project is one of 12 project sections in the HSR system and spans 14 miles between Hollywood Burbank Airport in the City of Burbank and Los Angeles Union Station in the City of Los Angeles. Construction of the Proposed Project will occur over a nine-year period from 2020-2028[2]. It is anticipated that operations will begin in 2029[3].

Based on a review of the Draft EIR/EIS and supporting technical documents, South Coast AQMD staff has seven main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. CEQA Air Quality Analysis for Regional Construction Impacts: In the Draft EIR/EIS, the Authority used 10 miles (one-way) of truck trip length to quantify the Proposed Project's hauling emissions from exporting contaminated soil and construction materials. Since most of the off-site landfill disposal facilities identified in the Draft EIR/EIS are located more than 10 miles away (one-way), and it is likely that contaminated soil may need to be disposed at a permitted hazardous disposal facility that is located in a different county or state, using a one-way trip length of 10 miles likely underestimated the Proposed Project's hauling emissions, particularly NOx emissions. Additionally, the Authority quantified the Proposed Project's construction emissions from removing 80,000 cubic yards of contaminated soil but did not explain how this amount was developed. The Authority identified that 47 properties within the

[1] Draft EIR/EIS. Summary. Page S-1.
[2] *Ibid.* Section 3.3 Air Quality. Page 3.3-38.
[3] *Ibid*. Page 3.2-41.

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Proposed Project's footprint have known or suspected contamination. It is not clear if removal of contaminated soil for those 47 properties was in addition to or included in 80,000 cubic yards and should be clarified in the Final EIR/EIS.

2. CEQA Air Quality Analysis for Regional Operational Impacts: In the Draft EIR/EIS, the Authority quantified emissions reductions from aircraft due to reduced air travel in Southern California and included those reductions to determine the level of significance for the Proposed Project's operational air quality impacts. Since the Proposed Project is one of three Southern California sections of the HSR system, it is not clear if the Proposed Project in itself will cause a reduced demand in air travel and decrease in aircraft emissions. Therefore, it is not appropriate to include emissions reductions for all of Southern California to analyze the Proposed Project's operational air quality impacts in the Draft EIR/EIS. The Authority should quantify the portion of aircraft emissions that will be reduced because of the Proposed Project in the Final EIR/EIS.

3. CEQA Air Quality Analysis for Localized Operational Impacts: In the Draft EIR, the Authority states that, due to the Proposed Project's design constraints, existing operational Metrolink Central Maintenance Facility (CMF) yard activities will be required to be relocated. However, the Draft EIR does not provide additional information or analysis of the environmental impacts associated with this direct impact of the Proposed Project. The Authority should provide more information on the proposed relocation site, the activities which would occur at this relocation site, the site's proximity to sensitive receptors (e.g. residents, schools, etc.) and analyze the localized air quality impacts from activities that will be relocated from the Metrolink CMF in the Final EIR/EIS.

4. Air Dispersion Modeling Parameters: The air dispersion modeling performed in the Draft EIR/EIS and technical supporting documents placed sensitive receptors locations along the fence line boundary, used the non-default regulatory option, and modeled emissions from construction equipment as an "Open Pit" source. The Authority should provide additional information to justify these modeling parameters in the Final EIR/EIS.

5. Recommended Revisions to Existing Impact Avoidance and Minimization Features: Based on an estimated construction timeframe of 2020 to 2028, the Authority will require the use of off-road Tier 4 construction equipment and an average fleet mix of on-road haul trucks that meet or exceed model year 2010 engine standard. However, it is possible that the construction could be delayed beyond these timeframes. Therefore, to achieve additional emission reductions to the maximum extent feasible, South Coast AQMD staff recommends that the Authority strengthen the existing IAMFs in the Final EIR/EIS by requiring the use of zero-emissions (ZE) off-road construction equipment and ZE or near-zero emissions (NZE) material delivery and soil import/export haul trucks during construction. The Authority should also require truck routes be clearly marked with trailblazer signs.

6. Additional Recommended Air Quality Mitigation Measures: In the Draft EIR/EIS, the Authority proposes to purchase emissions credits from South Coast AQMD to offset the Proposed Project's construction emissions. South Coast AQMD staff looks forward to further discussions with the Authority on the approach and mechanism to demonstrate that General

Conformity requirements have been met. In the Final EIR/EIS, the Authority can and should require additional mitigation measures to achieve direct reductions of construction emissions, especially for regional pollutants, before purchasing offset credits. It is important to note that emissions credits can be used to offset regional impacts, but not localized impacts. The Authority should develop performance standards to require the use of zero-emissions or near-zero emissions trucks during construction (e.g., material delivery trucks and soil import/export) in the Final EIR/EIS. Additional recommended mitigation measures during operation are also included in the attachment.

7. South Coast AQMD Rules and Permits: In the Draft EIR/EIS, the Authority will require the use of concrete batch plants, conduct gas monitoring and collection, and abandon active oil and gas wells within 200 feet of the proposed rail tracks. The Final EIR/EIS should discuss how the Proposed Project will comply with South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil[4] and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Containments[5]. The Authority should consult with South Coast AQMD's Engineering and Permitting staff to determine if any permits from South Coast AQMD will be required. If permits from South Coast AQMD are required, the Authority should identify South Coast AQMD as a Responsible Agency in the Final EIR/EIS.

In conclusion, the Draft EIR/EIS likely underestimated the Proposed Project's construction emissions and overestimated the Proposed Project's air quality benefits by considering aircraft emissions occurring in Southern California. South Coast AQMD staff recommends that the Authority revise the air quality analysis in the Final EIR/EIS.

South Coast AQMD staff is available to work with the Authority to address any air quality questions that may arise from this comment letter. Please feel free to call me at (909) 396-3176 if you have questions or wish to discuss our comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment
SN/IM/VT/JW:LS/AM
LAC200526-01
Control Number

[4] South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: http://www.aqmd.gov/docs/default-source/rule book/reg-xi/rule-1166.pdf.
[5] South Coast AQMD. Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Containments. Accessed at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf.

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ATTACHMENT

South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment

The Authority analyzed the Proposed Project's regional and localized construction air quality impacts after incorporating six construction air quality Impact Avoidance Minimization Features (IAMFs) as project requirements. The Proposed Project's mitigated regional nitrogen oxide (NOx) and carbon monoxide (CO) emissions would be significant and unavoidable at 482.11 pounds/day (lbs/day) and 708.97 lbs/day, respectively[6]. The Authority performed air dispersion modeling to analyze the Proposed Project's localized construction air quality impacts and found that concentrations would not exceed the air quality standards, except for nitrogen dioxide (NO2). The Proposed Project would result in a maximum 1-hour NO2 concentration of 643 micrograms per cubic meter (µg/m^3) during construction[7], which exceeds the 1-hour National Ambient Air Quality Standard of 188 µg/m^3 and the 1-hour California Ambient Air Quality Standard (CAAQS) of 339 ug/m^3. The Proposed Project would also result in a maximum annual NO2 concentration of 77.3 µg/m^3 during construction[8], which exceeds the annual CAAQS of 57 µg/m^3. The Authority also conducted a Health Risk Assessment (HRA) for the Proposed Project's construction activities, which would result in a cancer inhalation risk of 2.6 in one million[9], which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk[10].

The Authority quantified the statewide and regional operational emissions for the medium (46.8 million) and high (56.8 million) ridership scenarios with a planning horizon of 2040[11]. Both direct emissions from HSR station operations and fugitive dust from train operations and indirect emissions from regional vehicle travel, aircraft, and electricity generation were calculated in the Draft EIR/EIS[12]. The Authority found that operation of the HSR system would result in a net regional decrease in emissions for all criteria pollutants because of reductions in regional vehicle and air travel[13]. Therefore, the HSR system would have a beneficial air quality impact under CEQA[14].

South Coast AQMD staff's detailed comments on the CEQA air quality impacts analysis and air dispersion modeling are provided as follows.

[6] Draft EIR/EIS. Section 3.3. Pages 3.3-49 to 54.
[7] *Ibid.* Page 3.3-61 to 63.
[8] *Ibid.*
[9] *Ibid.*
[10] South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.
[11] Draft EIR/EIS. Section 3.2 Air Quality. Page 3.3-28.
[12] *Ibid.* Section 3.3. Pages 3.3-62 to 71.
[13] *Ibid.*
[14] *Ibid.*

1. CEQA Air Quality Analysis for Regional Construction Impacts

Truck Trip Length

The Authority reduced the default one-way truck trip length from 20 miles to 10 miles to quantify the Proposed Project's construction emissions from hauling construction materials and importing or exporting soil. In the Public Utilities and Energy Section of the Draft EIR/EIS, the Authority identified five off-site disposal landfill facilities for solid waste collections: Burbank Landfill Site No. 3 in the City of Burbank, Scholl Canyon Landfill in the City of Glendale, Chiquita Canyon Landfill in the community of Castaic in Los Angeles County, Calabasas Landfill in the community of Agoura Hills in Los Angeles County, and Sunshine Canyon Landfill in the community of Sylmar in the City of Los Angeles[15]. As shown in Table A below, the majority of the landfill facilities are more than 10 miles away (one-way). Additionally, as discussed in Comment No. 2, the Proposed Project will require the removal of contaminated soil. Depending on the type of contamination, contaminated soil may not be accepted at any of these off-site disposal landfill facilities identified in the Draft EIR/EIS and may need to be disposed at a permitted hazardous disposal facility outside Los Angeles County with a one-way trip length that is likely longer than 39 miles. During the earth moving construction phase, which spans over a five-year period between 2020 and 2025, an estimated 398,750 one-way truck trips would be required for hauling 3,190,000 cubic yards of soil[16]. Using a one-way truck trip length of 10 miles likely underestimated the Proposed Project's construction emissions. Therefore, South Coast AQMD staff recommends that the Authority identify the permitted hazardous disposal facility that the Proposed Project will use to dispose contaminated soil, disclose it in the Final EIR/EIS, and re-calculate the Proposed Project's construction emissions from haul truck trips based on the appropriate one-way trip length.

Table A: Trip Lengths to Landfills Identified in the Draft EIR/EIS

Off-site Disposal Landfill Facilities Identified in the Draft EIR/EIS	One Way Truck Trip Length from the Proposed Project (Hollywood Burbank Airport)	One Way Truck Trip Length from the Proposed Project (Los Angeles Union Station)
Burbank Landfill No. 3	6 miles	12 miles
Scholl Canyon Landfill	15 miles	13 miles
Chiquita Canyon Landfill	28 miles	39 miles
Calabasas Landfill	26 miles	32 miles
Sunshine Canyon Landfill	15 miles	26 miles

Source: South Coast AQMD staff generated using Google Maps. Date: July 2020.

Removal of Contaminated Soil

In the Draft EIR/EIS, the Authority quantified the Proposed Project's construction emissions from removing 80,000 cubic yards of contaminated soil but did not explain how this amount of soil export was developed. Additionally, in the Hazards and Hazardous Materials Section of the Draft EIR/EIS, the Authority lists 47 properties within the Proposed Project's footprint that present a

[15] *Ibid.* Section 3.6 Public Utilities and Energy. Page 3.6-18.
[16] *Ibid.* Air Quality Technical Report, Appendix A: *CalEEMod Construction Emissions*. CalEEMod Annual Run "HSR B-LA Earthmoving Phase". PDF page 1417.

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potential environmental concern (PEC) due to known or suspected site contamination. Six of them are listed as "high-risk", which is defined as a property where "additional investigation and review indicated contamination is present and likely to be encountered during construction, and abatement of building materials will be required prior to construction"[17]. It is unclear if additional amount of contaminated soil will need to be removed for cleaning up those 47 properties or is included in 80,000 cubic yards of contaminated soil for export. The Authority should include additional information to clarify that in the Final EIR/EIS. If more than 80,000 cubic yards of contaminated soil will need to be removed, the Authority should re-calculate the Proposed Project's construction emissions for hauling from soil export in the Final EIR/EIS.

2. CEQA Air Quality Analysis for Regional Operational Impacts

In the Draft EIR/EIS, the Authority quantified statewide and regional operational emissions associated the HSR system based on the medium and high ridership scenarios[18]. Although emissions from electrical demands are expected to increase, vehicle and air travel are expected to be reduced[19]. As such, the Authority found that the HSR system will result in net decreases in criteria pollutants emissions, both statewide and regionally[20]. For example, in the regional air quality analysis, the Authority found that, with implementation of the Proposed Project (based on a high ridership scenario), changes to air travel in Southern California would result in NOx emissions reductions ranging from 254 tons/year to 465 tons/year[21].

The California HSR system includes more than 800 miles of rail tracks throughout the state, connecting the major population centers of Sacramento, the San Francisco Bay Area, the Central Valley, Los Angeles, the Inland Empire, Orange County, and San Diego[22]. It is appropriate to assume that the HSR system will, collectively, reduce the demand for air travel and include aircraft emissions reductions in the first-tier, programmatic-level environmental documents[23].

The Proposed Project involves a 14-mile rail track for freight and passenger services and has a limited geographic scale between Hollywood Burbank Airport in the City of Burbank and Los Angeles Union Station in the City of Los Angeles. The Authority is also developing two other project sections of the HSR system (the Palmdale to Burbank Project Section and the Los Angeles to Anaheim Project Section) in Southern California. While the statewide HSR system and the three Southern California project sections of the HSR system are expected to provide an alternative transportation mode to air travel and reduce aircraft emissions, there is not enough information in the Draft EIR/EIS to support that the Proposed Project in itself will cause a reduced demand in intrastate or regional air travel. Including reductions in aircraft emissions from changes to air travel for all of the Southern California project sections may have improperly credited the Proposed Project with emissions reductions that are independent of the Proposed Project. Therefore, South Coast AQMD staff recommends that the Authority quantify the portion of emissions from air travel that will be reduced because of the Proposed Project and include those emissions in the Proposed Project's operational emissions profile to be compared to South Coast AQMD's regional air

[17] *Ibid.* Section 3.10 Hazardous Materials and Wastes. Table 3.10-6. Pages 3.10-32 and 33.
[18] *Ibid.* Section 3.3. Pages 3.3-62 to 71.
[19] *Ibid.* Section 3.2 Transportation. Page 3.2-81.
[20] *Ibid.* Section 3.3. Page 3.3-62 to 71.
[21] *Ibid.* Air Quality and Global Climate Change Technical Report. Pages 7-14 to 7-17.
[22] *Ibid.* Page S-1.
[23] *Ibid.* Section 3.2. Page 3.2-81.

quality CEQA significance thresholds for operation to determine the level of significance. This recommendation facilitates the intended use of this EIR/EIS as a second-tier, project-level environmental document[24].

3. CEQA Air Quality Analysis for Localized Operational Impacts

In the Draft EIR/EIS, the Authority explains that, as a part of the Proposed Project, the existing Metrolink CMF will be redesigned to accommodate both the HSR operations and most existing CMF yard operations. The new configuration will require that wheel turning operations and progressive maintenance bays be relocated to another Metrolink facility; however, the Authority did not identify a relocation site or analyze the localized air quality impacts from operation of the relocated railyard activities at the relocation site in the Draft EIR/EIS[25]. Since the relocation of wheel turning operations and progressive maintenance bays from the Metrolink CMF to another Metrolink facility is directly related to the Proposed Project, the environmental impacts associated with the activities occurring at the relocation site should be analyzed and disclosed to the public in the Final EIR/EIS. The Authority should provide more information regarding the relocation site, including the proximity to nearby sensitive receptors (e.g. residents, schools, etc.), and analyze the localized air quality impacts from the relocated activities for comparison to South Coast AQMD's CEQA air quality localized significance thresholds or the National Ambient Air Quality Standards and the California Ambient Air Quality Standards in the Final EIR/EIS[26]. In addition, if Metrolink train activity is altered to accommodate this new maintenance location in the system, then any potential air quality impacts from that relocation should be analyzed along with other project air quality impacts, and mitigated if found to be significant.

4. Air Dispersion Modeling Parameters

To analyze the Proposed Project's localized construction air quality impacts, the Authority performed project-specific air dispersion modeling in the Draft EIR/EIS. South Coast AQMD staff recommends that the Authority revise the modeling parameters based on the following comments.

- In Appendix G: *Health Risk Assessment Technical Report*, the Authority explains that sensitive receptors were set at the Proposed Project's fence line boundary extending out to 1,000 feet (300 meters) at a 25-meter spacing[27]. Upon review of the air dispersion modeling files, South Coast AQMD staff found that sensitive receptors were only placed along the fence line boundary. This placement may not have captured the maximum predicated receptors and the peak concentrations. Therefore, South Coast AQMD staff recommends that the Authority use a uniform Cartesian grid with a spacing of 100 meters or less for all distances less than 1,000 feet[28], or provide information to demonstrate that the peak concentrations were identified with placement of discrete receptor locations along the fence line boundary.

[24] *Ibid.* Page S-4.
[25] *Ibid.* Chapter 2 Alternatives. Page 2-48.
[26] South Coast AQMD. *Localized Significance Thresholds*. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.
[27] *Ibid.* Appendix G: *Health Risk Assessment Technical Report*. Pages 3-3 to 3-4.
[28] South Coast AQMD. "Modeling Guidance for AERMOD". Accessed at: http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance

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- In the air dispersion model, the Authority used the non-regulatory default option "FASTAREA". South Coast AQMD staff recommends using the regulatory default option or providing justification for using the non-regulatory default FASTAREA option.

- Emissions from construction equipment were modeled as an "Open Pit" source. The "Open Pit" source in AERMOD is used to model emissions from surface coal mines and rock quarries. South Coast AQMD staff recommends the Authority provide additional information to explain how the emission characteristics of off-road construction equipment are representative of those of an "Open Pit" source to justify the use of this source in the air dispersion model.

5. Recommended Revisions to Existing Impact Avoidance and Minimization Features

In the Draft EIR/EIS, the Authority is committed to six air quality and 12 transportation Impact Avoidance and Minimization Features (IAMFs). Among them, AQ-IAMF#4 requires that all off-road diesel construction equipment meet Tier 4 engine requirements. AQ-IAMF#5 requires that all on-road construction haul trucks consist of an average fleet mix of model year 2010 or newer engine standards. Transportation (TR) IAMF #7 requires the use of construction truck routes away from sensitive receptors[29]. Since the Proposed Project will result in significant and unavoidable construction air quality impacts, particularly for NOx and CO, to further reduce construction emissions and their impacts on nearby sensitive receptors, South Coast AQMD staff recommends that the Authority strengthen the existing measures AQ-IAMF#4, AQ-IAMF#5, and TR-IAMF#7 in the Final EIR/EIS.

AQ-IAMF#4 Reduce Criteria Exhaust Emissions from Off-Road Construction Equipment

The Proposed Project is anticipated to be constructed over a nine-year period beginning in 2020; however, it is likely that construction could be delayed beyond this timeframe and cleaner off-road construction equipment may become available as the construction schedule extends further out. Therefore, it is recommended that the Authority require the use of Tier 4 Final or cleaner construction equipment, electric powered construction equipment (also see Comment No. 6 for more details), and include additional information on implementation and monitoring of this IAMF in the Final EIR/EIS.

South Coast AQMD staff's recommended revisions AQ-IAMF#4 are in strikethrough and underline as follows.

- All heavy-duty off-road construction diesel equipment used during the construction phase would meet Tier 4 Final or newer engine requirements, which includes the use of zero-emission off-road construction equipment. Include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any construction activities. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. Require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance and conduct regular inspections to the maximum extent feasible to ensure compliance.

[29] Draft EIR/EIS. Appendix 2-B *Impact Avoidance and Minimization Features*. Pages 2-B-2 through 2-B-3 and 2-B-11.

AQ-IAMF#5 Reduce Criteria Exhaust Emissions from On-Road Construction Equipment

In the Draft EIR/EIS, the Authority is committed to requiring an average fleet mix of 2010 model year trucks or newer. This means that not all haul trucks for the Proposed Project will need to meet or exceed 2010 model year engine standards. South Coast AQMD staff recommends that all on-road trucks used to haul construction materials and soil import/export meet and/or exceed 2010 model year engine standard. However, it is possible that the construction could be delayed beyond the construction timeframe of 2020 to 2028 that the Draft EIR/EIS used to estimate the Proposed Project's construction emissions. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of zero-emissions (ZE) and near-zero-emissions (NZE) trucks such as the Advanced Clean Trucks Rule[30] and the Heavy-Duty Low NOx Omnibus Regulation[31], ZE and NZE trucks will become increasingly more available to use. Since the Proposed Project's construction air quality impacts would be significant and unavoidable, particularly for NOx emissions, the Authority should require the use of ZE or NZE trucks during construction. (Also see Comment No. 6 for more details).

South Coast AQMD staff's recommended revisions to AQ-IAMF#5 are in strikethrough and underline as follows.

- Prior to issuance of construction contracts, the Authority would incorporate the following material hauling truck fleet mix requirements into the contract specifications:

  At a minimum, all on-road trucks used to haul construction materials, including fill, ballast, rail ties, and steel would consist of ~~an average fleet mix of equipment~~ model year 2010 or newer haul trucks that meet California Air Resources Board's (CARB) 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions. ~~but no less than the average fleet mix for the current calendar year as set forth in the CARB's EMFAC 2014 database~~. […]. Alternatively, require the use of ZE or NZE material delivery and soil import/export haul trucks during construction.

TR-IAMF#7: Construction Truck Routes

South Coast AQMD staff's recommended revisions TR-IAMF#7 is in strikethrough and underline as follows.

[30] California Air Resources Board. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.

[31] CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox.

- The Contractor shall deliver all construction-related equipment and materials on the appropriate truck routes and shall prohibit heavy-construction vehicles from using alternative routes to get to the site. Truck routes would be established away from schools, day care centers, and residences, or along routes with the least impact if the Authority determines those areas are unavoidable. This measure shall be addressed in the CTP. The Authority should also require that truck routes are clearly marked with trailblazer signs, so that trucks will not enter areas where sensitive receptors are present.

6. Additional Recommended Air Quality Mitigation Measures

Construction-related Air Quality Mitigation Measures

In the Draft EIR/EIS, the Authority will require implementation of one air quality mitigation measure (AQ-MM#1). AQ-MM#1 would require the purchase of emission offsets through an anticipated contractual agreement between the Authority and South Coast AQMD to reduce the Proposed Project's construction NOx emissions[32].

CEQA requires that the Lead Agency considers mitigation measures to minimize significant adverse impacts (CEQA Guidelines Section 15126.4) and that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. The Authority can and should require additional air quality mitigation measures to generate direct reductions of emissions from regional pollutants before purchasing offset emission credits. The Authority can and should incorporate emissions reductions outside the area of the Proposed Project by requiring the use of cleaner construction equipment and heavy-duty haul trucks that will be used for material delivery trucks and soil import/export. Specifically, the Authority can and should require the use of ZE or NZE trucks, such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr).

Technology is transforming the transportation sector at a rapid pace. ZE construction equipment and cleaner trucks, such as ZE or NZE trucks that meet the newly approved CARB standard or optional low NOx standard, will become increasingly more feasible and commercially available as technology advances. If using ZE or NZE construction equipment and heavy-duty haul trucks as a mitigation measure to reduce the Proposed Project's construction air quality impacts is not feasible today, they could become feasible in a reasonable period of time during the Proposed Project's nine-year construction period, which may be extended into the future due to funding uncertainty for the Proposed Project[33] (CEQA Guidelines Section 15364). Therefore, it is recommended that the Authority develop a process with performance standards to require and/or accelerate the deployment of the lowest emission technologies and the utilization of ZE or NZE construction equipment and heavy-duty haul trucks (CEQA Guidelines Section 15126.4(a)). The Authority can and should develop the performance standards as follows or any other comparable standards in the Final EIR/EIS.

[32] *Ibid*. Section 3.3. Page 3.3-54.
[33] *Ibid*. Page S-1.

- Develop a minimum amount of ZE or NZE construction equipment and heavy-duty haul trucks that the Proposed Project must use during each year of construction to ensure adequate progress. Include this requirement in the Proposed Project's construction bid documents.
- Establish a construction contractor(s)/truck operator(s) selection policy that prefers construction contractor(s)/truck operator(s) who can supply ZE or NZE construction equipment and heavy-duty haul trucks. Include this policy in the Request for Proposal for selecting construction contractor(s)/truck operator(s).
- Develop a target-focused and performance-based process and timeline to review the feasibility to implement the use of ZE or NZE construction equipment and heavy-duty haul trucks during construction. Include this process and timeline in the Construction Management Plan.
- Develop a project-specific process and criteria for periodically assessing progress in implementing the use of ZE or NZE construction equipment and heavy-duty haul trucks during construction. Include the assessment process and criteria in the Construction Management Plan.

Implementation of the Proposed Project contributes to Basin-wide NOx emissions. Requiring the use of ZE or NZE construction equipment and heavy-duty haul trucks supports South Coast AQMD's efforts to attain state and federal air quality standards as outlined in the 2016 Air Quality Management Plan (AQMP), specifically an additional 45 percent reduction in NOx emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment[34,35]. Requiring the use of ZE or NZE construction equipment and heavy-duty haul trucks also fulfills the Lead Agency's legal obligation to mitigate the Proposed Project's significant construction air quality impacts and complies with CEQA's requirements for mitigation measures.

Operation-related Air Quality Mitigation Measures

- Require at least six percent of the Proposed Project's 5,210 vehicle parking spaces (or 313 parking spaces) at the Burbank Airport Station and the Los Angeles Union Station[36] to provide electric vehicle (EV) charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles to plug-in. The Authority should quantify emissions from generating additional electricity for the EV charging stations and combine them with emissions from energy consumption for the electrified trains to analyze the Proposed

[34] South Coast AQMD. March 3, 2017. *2016 Air Quality Management Plan.* Accessed at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.
[35] Based on the air dispersion modeling that was performed to analyze the Proposed Project's localized air quality impacts, the Lead Agency found that the Proposed Project would result in NO2 concentrations that would exceed the federal 1-hour standard and the state annual standard during construction. (Draft EIR/EIS. Chapter 3. 3 Air Quality. Page 3.3-61 and 62). In the Appendix I: *Health Effects* of the 2016 AQMP, South Coast AQMD staff discussed a 2016 health study by the U.S. EPA. The study found that when adults with asthma are exposed to NO2 at the 100 parts per billion (ppb) to 300 ppb concentrations, they experienced an increase in airway responsiveness, which in asthmatics can worsen symptoms and reduce lung function. (Page I-54. Accessed at: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf).
[36] *Ibid*. Page S-14.

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Project's operational air quality impacts in the Final EIR/EIS (See Comment No. 2 above). The Authority should also evaluate and identify sufficient power available for passenger vehicles and supportive infrastructures (e.g., EV charging stations) in Section 3.6, Public Utilities and Energy, of the Final EIR/EIS, where appropriate.

- Consider implementation of Smart Parking systems to reduce vehicle idling time in parking facilities.

- Collaborate with local and regional agencies and transportation providers to develop incentive programs or other methods to increase ridership.

7. South Coast AQMD Rules and Permits

In the Draft EIR/EIS, the Authority will require the use of concrete batch plants outside the Burbank Airport Station area during construction (AQ-IAMF#6), implement best management practices for gas monitoring, including installation of gas venting, collecting, and monitoring systems during construction [Geologic Resources (GEO)-IAMF #3], and abandon any active oil and gas wells within 200 feet of the Proposed Project's rail tracks [Safety and Security (SS)-IAMF#4]. The Authority should include discussions on how construction activities will comply with South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil[37] and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Containments[38].

It is also recommended that the Authority consult with South Coast AQMD's Engineering and Permitting staff to determine if any permits from South Coast AQMD will be required, and if compliance with other applicable South Coast AQMD rules is required and should be discussed in the Air Quality Section of the Final EIR/EIS. In the event that the Proposed Project requires permits from South Coast AQMD, the Authority should identify South Coast AQMD as a Responsible Agency in the Final EIR/EIS. Any assumptions used in the Final EIR/EIS will be used as the basis for evaluating the permits under CEQA and imposing permit conditions and limits. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: http://www.aqmd.gov/home/permits.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Authority provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR/EIS. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned

[37] South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: http://www.aqmd.gov/docs/default-source/rule book/reg-xi/rule-1166.pdf.

[38] South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Containments. Accessed at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf.

analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Authority makes the finding that the recommended revisions to the existing IAMFs and additional mitigation measures are not feasible, the Authority should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR/EIS (CEQA Guidelines Section 15091).

Response to Submission 873 (Lijin Sun, South Coast Air Quality Management District, August 29, 2020)

873-1591

This comment questions whether the hauling trip length of 10 miles was appropriate to account for the project's hauling emissions. The trip length for soil disposal was based on preliminary estimates identified by the project engineering team. The distance represents the average of all soil-hauling activities, which may be longer or shorter than 10 miles. Actual emissions are anticipated to have some variation, as the estimates for the project were based on a 15% design plan. During the construction equipment analysis it was determined that the locations of haul facilities were unknown and related distance required to transport contaminated soils would result in inaccurate data. The 10-mile trip was to represent travel to staging and stockpile locations within the B-LA corridor either to be treated or later transported off-site. It should be noted, however, that the Draft EIR/EIS identified NOX emissions during the construction period as significant and unavoidable, and this conclusion would not change with an increased haul length. The Authority will work with the SCAQMD during the construction period to track actual emissions in order to determine the exact number of credits needed during the construction period by tracking equipment usage. The Authority intends to log all equipment and duration of use to use in the determination of offset requirements. The 80,000 CY soil quantity was based on the assumption that all soil excavated within the rail corridor and along the tunnel would be unsuitable for use as fill. The estimate includes soil removal at the 47 properties identified in the Final EIR/EIS.

873-1592

Flight data was broken down by regions within the state. As such the emission reductions for Southern California were included in this document and highlighted in the regional analysis of the project. The proposed project on its own would not lead to reduced air travel demand, however analysis results shown in Table 3.3-23 through 3.3-30 show both the statewide and regional emission change with implementation of the project. This is an analysis of future year scenarios with reasonable assumptions that HSR Phase 1 would become operational in 2029 and in a mature operation by 2040. The analysis does not assume that the Burbank to Los Angeles segment would be functioning on its own.

873-1593

The commenter requests more detailed information about the Metrolink CMF relocation site. Details regarding how the HSR Build Alternative would reconfigure the CMF are provided in Section 2.5.2.2. As described in Section 2.5.2.2, the north end of the Metrolink CMF would be modified to shift the non-electrified tracks east within the right-of-way to accommodate the electrified tracks within the right-of-way. This reconfiguration of the CMF has been accounted for in the overall air quality analysis and health risk assessment prepared for the project. Construction emission concentrations in the Metrolink CMF area are provided in Table 3.3-21 of the EIR/EIS. Any yard activities that would be required to be relocated are proposed to be relocated to Metrolink's Eastern Maintenance Facility in Colton, California. CEQA and NEPA approvals for the Eastern Maintenance Facility were issued in 2011.

873-1594

The commenter requests additional information on the modeling parameters used in the air dispersion modeling. The initial model runs prepared for the project included the AERMOD model set up in a rough 100-meter spacing Cartesian receptor grid out to 6,560 feet (2,000 meters) and the fine 25-meter spacing Cartesian receptor grids at the specific locations of sensitive receptors such as residential units, schools, and recreational parks extending out to 1,000 feet (300 meters) from the project site boundary. Based on the results from the initial model run, it was determined the maximum concentrations would occur along the fence line boundaries.

As such, subsequent revisions and refinements to the AERMOD model were evaluated using the project's fence line boundaries with a 25-meter spacing and placed discrete Cartesian receptor points at specific locations with known sensitive receptors. Maximum concentrations were identified along the fence line boundary. None of the concentrations were greater than the maximum concentrations were found for the distances beyond the fence line boundary out to 1,000 feet.

The FASTAREA mode optimizes the area source algorithm appropriate for use in the dispersion analysis and reduces the execution run time during the AERMOD model analyses. The predicted concentrations of the criteria pollutants would not change due to the selection of the FASTAREA mode in AERMOD model. No revisions to this Final EIR/EIS have been made in response to this comment.

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873-1595

The commenter is recommending revisions to the IAMFs. The Authority recognizes that there are potential opportunities for the use of zero-emissions (ZE) off-road construction equipment and ZE or near-zero-emissions (NZE) material delivery and soil import/export haul trucks in the near future. According to the SCAQMD's Off-Road Equipment White Paper for the 2016 Air Quality Management Plan, the SCAQMD acknowledged that there is a need to develop new off-road engines and equipment that will be at ZE and NZE levels. New mechanisms must be developed to significantly increase deployment of ZE and NZE technology equipment. Such mechanisms may take the form of regulations or monetary and nonmonetary incentives. Under TR-IAMF #2 (Construction Transportation Plan), the Authority will direct all construction activities that would attract diesel truck trips avoid using local residential streets by clearly marked routes with way-finding signs.

873-1596

The Authority recognizes that there are potential opportunities for the use of zero-emissions (ZE) off-road construction equipment and ZE or near-zero-emissions (NZE) material delivery and soil import/export haul trucks in the near future. According to the SCAQMD's Off-Road Equipment White Paper for the 2016 Air Quality Management Plan, the SCAQMD acknowledged that there is a need to develop new off-road engines and equipment that will be at ZE and NZE levels. New mechanisms must be developed to significantly increase deployment of ZE and NZE technology equipment. Such mechanisms may take the form of regulations or monetary and nonmonetary incentives. Under TR-IAMF #2 (Construction Transportation Plan), the Authority will direct that all construction activities that would attract diesel truck trips avoid using local residential streets by clearly marked routes with way-finding signs.

873-1597

The commenter is requesting consultation for potential construction and operations permitting of the proposed project. The railroad corridor is owned and managed by Metro. Any work activities or projects associated with the railroad corridor, such as gas monitoring and collection, and the abandonment of active oil and gas wells within 200 feet of the rail tracks would be the responsibility of Metro. For the use of concrete batch plants, the Authority will consult with the SCAQMD's Engineering and Permitting staff for the permitting requirements of such operations. All soil handling will be conducted with strict adherence to all rules and regulations, including those of the SCAQMD. Compliance with South Coast AQMD Rule 1166 –Volatile Organic Compound Emissions from Decontamination of Soil and Rule 1466 –Control of Particulate Emissions from Soils with Toxic Air Containments is addressed in Section 3.10, Hazardous Materials and Wastes, in this Final EIR/EIS where text has been updated to refer to compliance with these rules.

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873-1598

The commenter provides a concluding statement to summarize comments on the Draft EIR/EIS, which states the concern that construction emissions are underestimated while operational air quality benefits are overestimated. It should be noted that the construction emission estimates for the project were based on 15% design plans. As such, the trip length for soil disposal was based on preliminary estimates identified by the project engineering team based on the best available data at the time. The distance represents the average of all soil-hauling activities, which may be longer or shorter than 10 miles. Actual emissions are anticipated to have some variation as the estimates for the project. It should be noted, however, that the Draft EIR/EIS identified NOX emissions during the construction period as significant and unavoidable, and this conclusion would not change if an increased haul route length was assumed in the analysis.

The proposed project is part of the larger HSR system within California and the Southern California region. The EIR/EIS evaluation of the emissions reduction benefits from HSR system operations was based on the Authority's 2016 Business Plan, which included assumptions that Phase 1 would be open and operational by 2029, and HSR operations would build to higher levels in 2040. The emissions reductions benefits described in Chapter 3.3, Impacts AQ # 9 and AQ # 10 are therefore calculated based on the assumption that Phase 1 is complete, and that Burbank to Los Angeles section would be functioning as part of the larger system, not as its own 14-mile segment disconnected from other sections of the HSR. If Burbank to Los Angeles were constructed and operated completely independent of the larger Phase 1 HSR system, it would still have some level of emissions reductions benefits, however, those benefits would be far less than if it operates as part of Phase 1 to provide connectivity between San Francisco and Los Angeles.

873-1599

This comment questions whether the hauling trip length of 10 miles was appropriate to account for the project's hauling emissions. The trip length for soil disposal was based on preliminary estimates identified by the project engineering team. The distance represents the average of all soil-hauling activities, which may be longer or shorter than 10 miles. Actual emissions are anticipated to have some variation, as the estimates for the project were based on a 15% design plan. During the construction equipment analysis it was determined that the locations of haul facilities were unknown and related distance required to transport contaminated soils would result in inaccurate data. The 10-mile trip was to represent travel to staging and stockpile locations within the B-LA corridor either to be treated or later transported off-site. It should be noted, however, that the Draft EIR/EIS identified NOX emissions during the construction period as significant and unavoidable, and this conclusion would not change with an increased haul length. The Authority will work with the SCAQMD during the construction period to track actual emissions in order to determine the exact number of credits needed during the construction period by tracking equipment usage. The Authority intends to log all equipment and duration of use to use in the determination of offset requirements.

873-1600

This comment requests an explanation of how the quantity of soil export was developed. The soil off-haul quantities were estimated by the project engineer. Emissions associated with soil removal are anticipated to have some variation, as the estimates for the project were based on a 15% design plan which provides sufficient detail to determine impacts based upon estimated construction quantities.

The 80,000 CY soil quantity was based on the assumption that all soil excavated within the rail corridor and along the tunnel would be unsuitable for use as fill. The estimate includes soil removal at the 47 properties identified in the Final EIR/EIS.

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873-1601

The commenter is suggesting that the Southern California aircraft emission reductions used in the Draft EIR/EIS should be refined to be specific to only the proposed project. Based on the ridership estimates presented in the Authority's 2016 Business Plan, travel demand modeling analyses provided the estimated amount of passenger air travel expected to be reduced from the implementation of the entire HSR system. Flight data was broken down by regions within the state. As such, the emission reductions for Southern California were included in the Draft EIR/EIS and highlighted in the regional analysis of the project.

873-1602

The commenter requests more detailed information about the Metrolink CMF relocation site. Details regarding how the HSR Build Alternative would reconfigure the CMF are provided in Section 2.5.2.2. This reconfiguration of the CMF has been accounted for in the overall air quality analysis and health risk assessment prepared for the project. Any yard activities that would be required to be relocated are proposed to be relocated to Metrolink's Eastern Maintenance Facility in Colton, California. CEQA and NEPA approvals for the Eastern Maintenance Facility were issued in 2011..

873-1603

The commenter is requesting revised modeling inputs. The initial model runs prepared for the project included the AERMOD model set up in a rough 100-meter spacing Cartesian receptor grid out to 6,560 feet (2,000 meters) and the fine 25-meter spacing Cartesian receptor grids at the specific locations of sensitive receptors such as residential units, schools, and recreational parks extending out to 1,000 feet (300 meters) from the project site boundary. Based on the results from the initial model run, it was determined the maximum concentrations were identified along the fence line boundaries.

As such, subsequent revisions and refinements to the AERMOD model were evaluated using the project's fence line boundaries with a 25-meter spacing and placed discrete Cartesian receptor points at specific locations with known sensitive receptors. Maximum concentrations were identified along the fence line boundary. None of the concentrations greater than the maximum concentrations were found for the distances beyond the fence line boundary out to 1,000 feet. No revisions to this Final EIR/EIS have been made in response to this comment.

873-1604

The commenter is providing recommendations for model inputs. All construction activities throughout the Burbank to LA corridor would occur on flat elevation terrain. According to the User's Guide for the AMS/EPA Regulatory Model for AERMOD (EPA-454/B-19-027 August 2019), area sources on flat surfaces can be modeled using the FASTAREA option. The FASTAREA option is used to optimize model runtime for area sources (including AREA, AREAPOLY, and OPENPIT source types).The FASTAREA mode optimizes the area source algorithm appropriate for use in the dispersion analysis and reduces the execution run time during the AERMOD model analyses. The predicted concentrations of the criteria pollutants would not change due to the selection of the FASTAREA mode in AERMOD model. Both AREAPOLY and OPENPIT source types were used as model inputs to represent the shape of the surface construction areas and the depth of the excavation areas, respectively. No revisions to this Final EIR/EIS have been made in response to this comment.

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873-1605

The commenter is requesting additional information on model selections. According to the User's Guide for the AMS/EPA Regulatory Model for AERMOD (EPA-454/B-19-027 August 2019), the OPENPIT source type can be used to model open rectangular pits, such as the excavation of the rail tracks under the runway at Hollywood Burbank Airport. The OPENPIT source option was used for the modeling of the off-road construction equipment activity associated with the installation of the rail tracks below the surface. Under the runway, the exhausts from the equipment would leave the tunnel through the open pit areas on the north and south sides of the runway. No revisions to this Final EIR/EIS have been made in response to this comment.

873-1606

The commenter is recommending revisions to the IAMFs. The Authority recognizes that there are potential opportunities for the use of ZE off-road construction equipment and zero emission (ZE) or near-zero emission (NZE) material delivery and soil import/export haul trucks in the near future. According to the SCAQMD's Off-Road Equipment White Paper for the 2016 Air Quality Management Plan, the SCAQMD acknowledged that there is a need to develop new off-road engines and equipment that will be at ZE and NZE levels. New mechanisms must be developed to significantly increase deployment of ZE and NZE technology equipment. Such mechanisms may take the form of regulations or monetary and nonmonetary incentives. Therefore, further research, demonstration, and deployment programs by the USEPA, CARB, and SCAQMD need to be initiated to develop cleaner off-road engines. Mitigation measure AQ-MM#2 has been added to the FEIR/EIS. With implementation of Mitigation measure AQ-MM#2, the Authority and all project construction contractors will require that a minimum of 25 percent, with a goal of 100 percent, of all light-duty on-road vehicles (e.g., passenger cars, light-duty trucks) associated with the project (e.g., on-site vehicles, contractor vehicles) use ZE or NZE technology.

In addition, the Authority will recommend that all construction activities that would attract diesel truck trips avoid using local residential streets by clearly marked routes with way-finding signs No changes to the IAMFs have been made in response to comments on the Draft EIR/EIS because the IAMFs are part of the project description and have been considered in the environmental analyses prepared for the EIR/EIS.

873-1607

The commenter is suggesting the construction may be delayed and cleaner equipment may become available. The Authority recognizes that the schedule has been delayed; however, emission estimates presented in the Draft EIR/EIS present a worst-case scenario, given the likelihood of cleaner equipment availability in the future. Mitigation measure AQ-MM#1 would require the Authority to work with the SCAQMD to offset construction emissions through a contractual agreement to fund emission reduction programs. Under this measure, the Authority will continue to participate in ongoing coordination to reduce emissions to the extent feasible, will use cleaner off-road construction equipment, and will offset the remaining emissions. Mitigation Measure AQ-MM#2 has been added to Final EIR/EIS in response to this comment. With implementation of Mitigation measure AQ-MM#2, the Authority and all project construction contractors will require that a minimum of 25 percent, with a goal of 100 percent, of all light-duty on-road vehicles (e.g., passenger cars, light-duty trucks) associated with the project (e.g., on-site vehicles, contractor vehicles) use ZE or NZE technology.

873-1608

Refer to response to comment 873-1595 of this chapter of this Final EIR/EIS.

873-1609

The commenter requests a modification to TR-IAMF#7. No revisions have been made to any IAMFs in response to comments on the Draft EIR/EIS because IAMFs are part of the project description which is fixed and they provide the basis of the impact analysis. However, the requested signage is a good example of the type of measure that could be included in the CTP based upon site conditions at the time of construction and in close consultation with the local jurisdiction having authority over the site.

873-1610

Refer to response to comment 873-1595. No changes to the IAMFs have been made in response to comments on the Draft EIR/EIS because the IAMFs are part of the project description and have been considered in the environmental analyses prepared for the EIR/EIS.

Response to Submission 873 (Lijin Sun, South Coast Air Quality Management District, August 29, 2020) - Continued

873-1611

The commenter is recommending operation-related air quality mitigation measures. It should be noted that based on the findings of the Draft EIR/EIS Impact AQ#9, once operational, the proposed project would result in a net benefit for all criteria pollutants. The parking lots at the Burbank Airport and Los Angeles Union Station (LAUS) train stations are under the control of the City of Burbank, the City of Glendale, the Pasadena Airport Authority, and Metro. Due to the reconstruction of the parking areas for HSR and non-HSR-related projects, the Authority will work with these two agencies to explore and implement electric vehicle charging stations consistent with current and future local and state guidelines. The Authority appreciates the suggested mitigation measure refinements s offered by the South Coast AQMD; however, none have been incorporated into this Final EIR/EIS because the Authority believes that the existing measures presented in Section 3.3.7 of this Final EIR/EIS are sufficient to mitigate impacts that can be mitigated.

873-1612

The commenter is requesting consultation for potential construction and operations of the proposed project. The railroad corridor is owned and managed by Metro. Any work activities or projects associated with the railroad corridor, such as the gas monitoring and collection, and the abandonment of active oil and gas wells within 200 feet of the rail tracks, would be the responsibility of Metro. For the use of concrete batch plants, the Authority will consult with the SCAQMD's Engineering and Permitting staff for the permitting requirements of such operations. All soil handling will be conducted with strict adherence to all rules and regulations, including those of the SCAQMD.

873-1613

The commenter is requesting consultation with SCAQMD Engineering and Permitting staff. Authority staff will consult with all local and regional agencies, including the SCAQMD, prior to initiating construction activities. For the use of concrete batch plants, the Authority will consult with the SCAQMD's Engineering and Permitting staff for the permitting requirements of such operations. No revisions to this Final EIR/EIS have been made in response to this comment.

873-1614

The commenter requests that the Authority provide written responses to the South Coast Air Quality Management District (SCAQMD) prior to certification of the EIR. The Authority, as required by CEQA, will provide written responses to SCAQMD 10 days prior to certification of the EIR. These responses will address the SCAQMD comments in detail, giving reasons why specific comments and suggestions are not accepted. The Authority will make the response to comments available along with the Final EIR/EIS on its website at least 30 days prior to Authority Board's action to certify the Final EIR/EIS and approve the project. The Authority will publish and mail out a Notice of Availability of the Final EIR/EIS.

Submission 763 (Richard Slade, Upper Los Angeles River Area, July 30, 2020)

ULARA
UPPER LOS ANGELES RIVER AREA WATERMASTER
Richard C. Slade - Watermaster

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July 30, 2020

To: Burbank to Los Angeles Draft EIR/EIS Comment
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071
Sent via email (Burbank_Los.Angeles@hsr.ca.gov)

From: Richard Slade, Watermaster
Upper Los Angeles River Area (ULARA)
www.ULARAwatermaster.com

Cc: ULARA Administrative Committee
Sent via email

Re: ULARA Watermaster Comments
Draft Environmental Impact Report/Environmental Impact Statement
Burbank To Los Angeles Project Section
California High-Speed Rail Authority
(https://hsr.ca.gov/programs/environmental/eis_eir/draft_burbank_los_angeles.aspx?)

As the Court-appointed Watermaster for the Upper Los Angeles River Area (ULARA), my office has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (DEIR) for the California High-Speed Rail (HSR): Burbank to Los Angeles Project Section. Descriptions of the project in the DEIR state that temporary, or possibly permanent, dewatering activities will occur within the alignment of the HSR that lies within the boundaries of ULARA, as part of the construction of the rail line. Specifically, the local part of that alignment is located within the adjudicated ULARA Watershed, and the valley fill sediments of the San Fernando Groundwater Basin. Because of this adjudication, all extractions of groundwater from anywhere within the ULARA boundaries must be reported to the ULARA Watermaster. Extraction of groundwater from ULARA may impact the water rights of the right's holders as set forth in *The City of Los Angeles v. City of San Fernando, Los Angeles Superior Court Case No. 650079, dated January 26, 1979* (ULARA Judgment)[1]. 763-1166

Whereas the DEIR does mention the adjudication on Page 3.8-29, the document does not appear to describe the necessary reporting of groundwater extractions from ULARA to the Watermaster. Throughout the DEIR document, where temporary or permanent extraction of groundwater is discussed, additional language should be included so that all groundwater extractions from ULARA are reported to the ULARA Watermaster, and to the City of Los Angeles (via the Los Angeles Department of Water and Power); the City of Los Angeles holds prior and paramount pueblo water rights to native groundwater in the San Fernando Groundwater Basin. 76:

[1] The ULARA Judgment is available online via the ULARA Watermaster website:
http://ularawatermaster.com/public_resources/City-of-LA-vs-City-of-San-Fernando-et-al-JUDGMENT.pdf

Additional specific comments are as follows:

- Section 3.8.2 (page 3.8-2) of the DEIR does not include the ULARA Judgment in the list of "federal, state, and local laws, regulations, orders, and plans that are relevant to hydrology and water resources" of the project. Reference to the ULARA Judgement should be included in this section. 763-1167
- Table 3.8-5 (page 3.8-29) the tables lists "Typical Well Depths" ranging from 1,220 to 3,240 ft. There are no groundwater production wells in ULARA that extend to depths of 3,240 ft. Typical water well depths are on the order of 800 to 1,000 ft below ground surface. 763-1168
- Section 3.8.6.3 (page 3.8-49) states "*Because there is not an adopted GSP applicable to the groundwater basins within the project alignment, construction activities would not result in permanent impacts related to conflict with or obstruction of the implementation of a sustainable groundwater management plan."* This statement is repeated elsewhere in the document. This statement (and similar statements) should be edited to accurately reflect the Court-adjudicated status of ULARA. While there is no "sustainable groundwater management plan" for ULARA, groundwater within ULARA is adjudicated, and groundwater is managed in accordance with the ULARA Judgment. The ULARA Judgment requires safe yield operations for the ULARA groundwater basins to help ensure groundwater extractions over the long-term do not create a condition of overdraft. Basin management in ULARA is achieved by collective efforts between the Court-appointed ULARA Watermaster and an Administrative Committee consisting of representatives from the Parties to the ULARA Judgment. 763-1169
- Appendix 3.1-B: Regional and Local Policy Consistency Analysis - This section does not discuss the ULARA Watermaster, or the necessity of reporting groundwater extractions to the ULARA Watermaster. Such information should be included in this Appendix. 763-1170

Submission 763 (Richard Slade, Upper Los Angeles River Area, July 30, 2020) - Continued

ULARA Watermaster Comments
Draft Environmental Impact Report/Environmental Impact Statement
Burbank To Los Angeles Project Section
California High-Speed Rail Authority

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ULARA

We thank you for the opportunity to provide comments on this California High-Speed Rail Authority project. Should you have any questions, please do not hesitate to contact my office (www.ULARAwatermaster.com).

Respectfully submitted,

Richard C. Slade, ULARA Watermaster

Response to Submission 763 (Richard Slade, Upper Los Angeles River Area, July 30, 2020)

763-1166

The commenter requests that language be added to the EIR/EIS to state that all groundwater extractions from ULARA be reported to the ULARA Watermaster. Text was added to Impact HWR #6: Permanent Impacts on Groundwater Volume, Quality, and Recharge during Construction, of the Final EIR/EIS to specify that the Authority will consult with the ULARA Watermaster to describe the disturbance related to the HSR Project within the ULARA watershed and then ask for terms and conditions based on the disturbance. At the time of the consultation, the Authority would present the anticipated volume of groundwater that may be extracted and a proposed dewatering plan. During the consultation, the Authority will also gather information pertaining to notification or encroachment permit conditions required by the ULARA Watermaster and any Administrative Committee representatives.

763-1167

The commenter states that the EIR/EIS should discuss the Upper Los Angeles River Area (ULARA) Judgment. A discussion has been added to Section 3.8.2 in Section 3.8, Hydrology and Water Resources, of this Final EIR/EIS to describe the City of Los Angeles v. City of San Fernando, Los Angeles Superior Court Case No. 650079, dated January 26, 1979 (ULARA Judgment). This discussion includes the ULARA Judgment, including provisions and stipulations regarding: water rights; the calculation of imported return water credit; storage of water; stored water credit; and arrangements for physical solution water for certain parties as recommended by the California Supreme Court. The discussion of the ULARA Judgment also provides for a Court-appointed Watermaster to enforce the judgment.

763-1168

The commenter provides typical well depths in the ULARA jurisdiction. The typical well depths in Table 3.8-5 in Section 3.8, Hydrology and Water Resources, of this Final EIR/EIS, were obtained from the California's Groundwater: Bulletin 118, published by the Department of Water Resources in 2004. This information was updated in Section 3.8.5.6 of this Final EIR/EIS to include the well depths of 800 to 1,000 feet below ground surface provided by the ULARA Watermaster.

763-1169

The commenter requests that Section 3.8 be revised to clarify that groundwater be managed in accordance with ULARA judgement. Refer to response to comment 763-1166 contained in this chapter for the Authority's anticipated consultation with ULARA. In addition, the conclusion provided in Section 3.8 of this Final EIR/EIS that the HSR Project would not conflict with a groundwater management plan is accurate, because as noted by the commenter, there is no "sustainable groundwater management plan" for ULARA. No revisions have been made to the Final EIR/EIS in response to this comment.

763-1170

The commenter states the ULARA Watermaster is not included in Appendix 3.1-B. Refer to response 763-1166 contained in this chapter for the Authority's anticipated consultation with ULARA. As Appendix 3.1-B only provides a consistency analysis of plans and policies and does not include all anticipated coordination planned as part of the HSR Project and future design phases, no revisions to the Final EIR/EIS have been made in response to this comment.