

Submission 628 (Christian N/A, June 5, 2020)

Burbank - Los Angeles - RECORD #628 DETAIL

Status : Action Pending
Record Date : 6/5/2020
Submission Date : 6/5/2020
Interest As : Business and/or Organization
First Name : Christian
Last Name : N/A

Stakeholder Comments/Issues :

628-645 | Hi my name is Christian. I represent some business owners in the Burbank area and I'm wondering how we can respond to the draft it's the draft is not available online on the right page at the website and there's no links I've been clicking around. There's a section called copies of the draft EIR/EIS that talks about how they might be electronic copies but they're not here. So can you please give me a call back 818-252-3016, 818-252-3016. Where is the draft it should be posted online so that everyone can download it. Please call me back thank you.

Response to Submission 628 (Christian N/A, June 5, 2020)

628-645

The commenter requested clarification as to the location of the online version of the Draft EIR/EIS. The commenter was directed to the online version of the Draft EIR/EIS document that is available on the Authority's website. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 665 (Luis N Martinez, July 2, 2020)

Burbank - Los Angeles - RECORD #665 DETAIL

Status : Completed
Record Date : 7/2/2020
Submission Date : 7/2/2020
Interest As : Business and/or Organization
First Name : Luis N
Last Name : Martinez

Stakeholder Comments/Issues :

Attention Customer Service:

665-1433

Please remove the following names from your mailing list, they are no longer part of this organization.

Laurence B. Frank
Los Angeles Trade Technical College(lattc)
400 W Washington Blvd
Los Angeles CA 90015-4108

Copy Mail Center

Los Angeles Trade Technical College

400 W. Washington Blvd, CA 90015

T:213-763-3798 E:lattc-copycenter@laccd.edu

Response to Submission 665 (Luis N Martinez, July 2, 2020)

665-1433

The commenter requests a name be removed from the paper mailing list. It has been confirmed that this commenter has been removed from the Outreach mailing list.

Submission 697 (Michael Banner, July 21, 2020)

Burbank - Los Angeles - RECORD #697 DETAIL

Status : Action Pending
Record Date : 7/21/2020
Submission Date : 7/21/2020
Interest As : Business and/or Organization
First Name : Michael
Last Name : Banner

Stakeholder Comments/Issues :

Check this out:

697-785

https://issuu.com/uscedu/docs/usc_state_of_the_neighborhood_repor

Michael Banner
Los Angeles LDC
NEW ADDRESS
520 N. La Brea Ave, Suite108
Inglewood, California 90302
800.366.1178 office
213.448.8043 mobile
www.losangelesldc.com
Make A Deal, Make A Difference
Sent from my iPhone

Response to Submission 697 (Michael Banner, July 21, 2020)

697-785

The comment provides a link to the University of Southern California's (USC) State of the Neighborhood Report. CEQA and NEPA require a final EIR and EIS to respond to the comments received on environmental issues (see California Code of Regulations [Cal. Code Regs.] Title 14, §15088(a) and the Federal Railroad Administration (FRA) Procedures for Considering Environmental Impacts 14(s)). This comment does not address any specific environmental issue related to the project but has been included in the project's administrative record.

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

Submission 709 (Michael Banner, July 27, 2020)

Burbank - Los Angeles - RECORD #709 DETAIL

Status : Action Pending
Record Date : 7/27/2020
Submission Date : 7/27/2020
Interest As : Business and/or Organization
First Name : Michael
Last Name : Banner

Stakeholder Comments/Issues :

CAHSR:

709-853

How has the EIR/EIS evaluated the impact of the building of the proposed bridge at Main Street and Albion as an overpass that fosters encampments for Lincoln Height's growing unsheltered populations? Currently, Lincoln Height has no shelters for its unhoused population.

Response to Submission 709 (Michael Banner, July 27, 2020)

709-853

The commenter questions how the EIR/EIS has evaluated the impact of the proposed bridge at Main Street and Albion as an overpass that fosters encampments for Lincoln Heights' growing unsheltered populations.

The Draft EIR/EIS did not evaluate the project's potential to complete infrastructure that could foster people experiencing homelessness (PEH) encampments because those impacts are overly speculative. The analysis of these speculative impacts are not required under NEPA and CEQA. 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 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 to address PEH encampments along or under these public areas and rights of way would be the responsibility of those agencies who have jurisdiction over those areas.

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

Submission 734 (Burbank Station, July 29, 2020)

Burbank - Los Angeles - RECORD #734 DETAIL

Status : Action Pending
Record Date : 7/29/2020
Submission Date : 7/29/2020
Interest As : Business and/or Organization
First Name : Burbank
Last Name : Station

Stakeholder Comments/Issues :

Including the Burbank to Los Angeles email in this request. Please provide the requested information immediately.

----- Forwarded message -----

From: Burbank Station <chsraburbankstation@gmail.com>
Date: Wed, Jul 29, 2020 at 10:37 AM
Subject: Re: Document Request
To: HSR records@HSR <records@hsr.ca.gov>

Hello-

734-1054

I made this request 5 days ago and have still yet to receive these documents. I request that these documents be sent ASAP as the comment period ends in two days or you extend the public comment period on the Burbank to Los Angeles EIR/EIS. Not providing the public the materials essential in the development of the EIS in a timely and expeditious matter is a serious breach of the Administrative Procedures Act and NEPA standards. The Authority's inability to provide critical documents in the selection of a Preferred Alternative would warrant your decision making responsibilities as arbitrary and capricious.

On Fri, Jul 24, 2020 at 4:22 PM HSR records@HSR <records@hsr.ca.gov> wrote:

> This is confirmation that the Authority has received your request.

>
>
>

> *From:* Burbank Station <chsraburbankstation@gmail.com>

> *Sent:* Friday, July 24, 2020 5:59 AM

> *To:* HSR records@HSR <records@hsr.ca.gov>

> *Subject:* Document Request

>
>
>

> CAUTION: This email originated from outside of the organization. Do not

734-1055

> click links or open attachments unless you recognize the sender and know
> the content is safe.

>
>
>

> Please provide the following so I may adequately respond to the Draft
> EIR/EIS:

- > 1. Palmdale to Burbank Project Section Supplemental Alternatives
- > Analysis (SAA)
- > 2. Palmdale to Burbank Project Section Scoping Report
- > 3. Burbank to Los Angeles Project Section Supplemental Alternatives
- > Analysis (SAA)
- > 4. Burbank to Los Angeles Project Section Scoping Report

> Please provide pdfs of these documents as soon as possible.

>
>
>

> Thank you.

>
>
>

Response to Submission 734 (Burbank Station, July 29, 2020)

734-1054

The commenter requested a copy of the Draft EIR/EIS. The commenter was directed to the online version of the Draft EIR/EIS. It should be noted that the public comment period was extended twice, resulting in a comment period of 94 days. The comment period ended on August 31, 2020 to ensure members of the public would have time to review the Draft EIR/EIS and submit comments. No revisions to this Final EIR/EIS have been made in response to this comment.

734-1055

The commenter requested copies of several Authority documents from various project sections. The commenter was directed to online versions of these documents. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 861 (Rob Davidson, August 27, 2020)

Burbank - Los Angeles - RECORD #861 DETAIL

Status : Action Pending
Record Date : 8/27/2020
Submission Date : 8/27/2020
Interest As : Business and/or Organization
First Name : Rob
Last Name : Davidson

Stakeholder Comments/Issues :

- 861-1573 | This is Rob Davidson. I own property on Gibbons Street in Los Angeles and I'm calling about the Main Street separation project part of the project and want to understand how this is going to impact commercial properties along given Street and want to understand if there is any kind of exposure from the point of view of my property being acquired by I suppose eminent domain or some kind of city authority to take my property and I'm wondering how to find out more about this particular issue as it pertains to my particular properties on Gibbon
- 861-1574 | Street. So I attended the town hall recently and didn't get much information on this particular part of the subject. So I would like to understand who is in in charge of that part of the project and how to directly contact that person. So my name is Rob Davidson and my phone number is 626-429-0340. Thank you.

Response to Submission 861 (Rob Davidson, August 27, 2020)

861-1573

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

The commenter expresses concern for his property on Gibbons Street in Los Angeles and is seeking information on how the Main Street Grade Separation would impact his property.

Refer to Appendix 3.12-D, Property Acquisitions and Easements, for a detailed map showing expected property acquisitions and easements required.

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. These changes have generally resulted in reduced displacement impacts. Additionally, as described in Section 3.12.4.2, Implementation of SOCIO-IAMF#2 and SOCIO-IAMF#3 would provide relocation assistance to all residents and businesses displaced by the HSR Build Alternative in compliance with the Uniform Act and establish an appraisal, acquisition, and relocation process in consultation with affected cities, counties, and property owners. Implementation of these IAMFs would minimize impacts from the permanent displacement and relocation of local residents and businesses from construction of the HSR Build Alternative.

The Authority understands that the proposed construction of the HSR Project would affect private property owners. In light of this fact, the Authority has committed to educate, inform, and work collaboratively with affected property owners. Please refer to the Authority's website for additional resources for affected property owners:
https://hsr.ca.gov/programs/private_property/

Property owners who believe they have suffered a loss may file a claim with the State of California Government Claims Board. More information may be obtained online at <https://www.dgs.ca.gov/ORIM/Services/Page-Content/Office-of-Risk-and-Insurance-Management-Services-List-Folder/File-a-Government-Claim>

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

861-1573

861-1574

This commenter requested to know who to talk to regarding specific questions he had about how his property might be affected. The commenter was contacted and an office hours appointment to respond to his questions was held on August 27, 2020.

Submission 845 (Steven Goodman, Atlas Investments, LLC, August 18, 2020)

Jon Marin

From: Elisabeth Rosenson
Sent: Tuesday, August 18, 2020 1:33 PM
To: Ricard, Diane@HSR; Chelsea Dickerson
Cc: Bonstead, Tyler R.; Jon Marin; Nancy Verduzco
Subject: RE: Notice of Objection from the Owners of 2515 N. Hollywood Way, Burbank, CA

Hi Diane,
 We'll add this to CommentSense.

Thank you,
 Elisabeth

From: Ricard, Diane@HSR <Diane.Ricard@hsr.ca.gov>
Sent: Tuesday, August 18, 2020 1:25 PM
To: Elisabeth Rosenson <ERosenson@ArellanoAssociates.com>; Chelsea Dickerson <chelsea.dickerson@vmapr.com>
Cc: Bonstead, Tyler R. <Tyler.Bonstead@stvinc.com>
Subject: FW: Notice of Objection from the Owners of 2515 N. Hollywood Way, Burbank, CA

Hi Elisabeth,

Please add this to the B-LA comments.

Thanks,
 Diane

Diane M. Ricard

Project Manager: Burbank to Los Angeles to Anaheim
 California High-Speed Rail Program
 355 S Grand Ave, Suite 2050, Los Angeles CA 90071
 Cell: 213-700-2476
Diane.Ricard@hcr.ca.gov

I am currently teleworking, and am reachable by email and cell phone during business hours.



From: Steve Goodman <steve@atlasrealestate.us>
Sent: Tuesday, August 18, 2020 12:54 PM
To: Ricard, Diane@HSR <Diane.Ricard@hcr.ca.gov>; Dana Goodman <dana@atlasrealestate.us>
Subject: Notice of Objection from the Owners of 2515 N. Hollywood Way, Burbank, CA

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

Dear Diane,

845-1488

Please be advised that the ownership of the subject property, which is at 2515 N. Hollywood Way, Burbank, California, strongly objects to anyone, including your agency, tunneling under our property. Our objections include but are not limited to the following:

845-1489

1. Tunneling underneath our property and/or the operation of rail service under our property may impact the structural integrity of our soil, its compaction, and the existing building improvements and/or infrastructure.

845-1490

2. Construction on, around, or under our property, and/or the operation of rail service under our property may cause health hazards, including but not limited to air borne contaminants, to affect our tenant, its employees and their customers.

845-1491

3. Construction on, around, or under our property, and/or the operation of rail service under our property may cause disruption to one or more of the utilities that service our property.

845-1492

4. Construction on, around, or under our property, and/or the operation of rail service under our property may cause disruption to our tenant's business.

845-1493

5. Construction on, around, or under our property, and/or the operation of rail service under our property may reduce the value of our property.

6. Construction on, around, or under our property, and/or the operation of rail service under our property may reduce the lease-ability of our property, as well as reduce the lease rate we would otherwise be able to achieve, as well as reduce the quality of tenant we would otherwise be able to attract.

7. Construction on, around, or under our property, and/or the operation of rail service under our property may reduce the finance-ability of our property or cause us to get less attractive loan terms.

845-1494

8. Construction on, around, or under our property, and/or the operation of rail service under our property may cause noise pollution at our property.

845-1495

9. Construction on, around, or under our property, and/or the operation of rail service under our property may cause traffic congestion at our property and/or affect the ingress/egress.

845-1496

10. Construction on, around, or under our property, and/or the operation of rail service under our property may cause vibration and sensory issues at our property.

845-1497

11. Construction on, around, or under our property, and/or the operation of rail service under our property may cause unappealing odors at our property.

845-1498

12. Construction on, around, or under our property, and/or the operation of rail service under our property may limit our development potential at the property.

Submission 845 (Steven Goodman, Atlas Investments, LLC, August 18, 2020) - Continued

- 845-1498 | 13. Construction on, around, or under our property, and/or the operation of rail service under our property may limit the types of uses we can have at the property.
- 845-1499 | 14. Ownership was only just informed by you yesterday of this project and has not been given any site specific information (See below email). All you have provided us with are links informing us about the general aspects of the project at large. To properly evaluate our situation and the threats your project poses, we need detailed site and construction plans that clearly show and explain how our property will be impacted, when and for how long. In this regard, please provide a color coded map showing where the proposed tunnel runs in relation to our property. Please show any staging and/or equipment storage areas on our site and the proposed ingress/egress to access these or to conduct actual construction. Please provide a color coded map showing any other activities related to the tunnel that could affect our property directly or indirectly.

Please forward this notice of objection to any people or agencies on your side that should be advised of this objection, and please copy us on the notices to them.

Kindly reply to this email to confirm receipt of this notice of objection.

Thank you.

Steven Goodman

Atlas Investments, LLC
11661 San Vicente Blvd., Suite 701
Los Angeles, CA 90049

O 310 820.4900
C 310 650.7993

From: Ricard, Diane@HSR <Diane.Ricard@hsr.ca.gov>
Sent: Monday, August 17, 2020 7:26 PM
To: Dana Goodman <dana@atlasrealestate.us>
Cc: Steve Goodman <steve@atlasrealestate.us>
Subject: Follow-up to Telephone Call this Morning

Hi Dana,

This is a follow-up to our telephone call this morning. The California High Speed Rail Authority mailed notices to all owners and occupants within 500 feet from the Burbank to Los Angeles project section alignment (or ¼ mile from a station or grade separation). During the Draft EIR comment period that began on May 29, 2020, and will end on August 31, 2020, we have sent four mailers to your property (2515 N. Hollywood Way, Burbank), as well as the owner address we have on file for you (11661 San Vicente Blvd #701, Los Angeles, per data from the Los Angeles County Assessor). If this is not your current address, please provide us with your correct address so we may update our database. We will also add you to our email notification system.

You asked about the depth of the tunnel in the vicinity of your property in Burbank. According to the 15% engineering plans, the top of the tunnel will be located between 18 feet and 25 feet underground, and the bottom of the tunnel will be between 50 feet and 60 feet underground.

You may download an electronic copy of the draft EIR/EIS by clicking on this link: https://hsr.ca.gov/programs/environmental/eis_eir/draft_burbank_los_angeles.aspx There is also information on the project, including videos at <https://www.meethrsocal.org/>

If you would like to discuss our plans near your property one-on-one with staff, we would be happy to make an appointment with you at your convenience. Please email a few date/time options to support@meethrsocal.com and we will get back to you ASAP.

Thank you.

Best wishes,
Diane Ricard

Diane M. Ricard
Project Manager: Burbank to Los Angeles to Anaheim
California High-Speed Rail Program
355 S Grand Ave, Suite 2050, Los Angeles CA 90071
Cell: 213-700-2476
Diane.Ricard@hsr.ca.gov

I am currently teleworking, and am reachable by email and cell phone during business hours.



Response to Submission 845 (Steven Goodman, Atlas Investments, LLC, August 18, 2020)

845-1488

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

The commenter objects to tunneling under the cited property. Tunneling at this location is necessary to avoid impacts to the Hollywood Burbank Airport and its operations. It should be noted that the design of the HSR Build Alternative is the culmination of many years of technical analysis and evaluation as described in BLA-Response-Chapter 2 Alt-01: Alternatives. Please refer to the responses to comments 1489 through 1498 for responses to the commenter's specific concerns. No revisions to this Final EIR/EIS have been made in response to this comment.

845-1489

The commenter expressed opposition to the High-Speed Rail (HSR) Project tunneling under their property, specifically how tunneling and operating rail service under their property may affect the structural integrity of the soil, its compaction, and the existing building improvements. As discussed in GEO-IAMF#1, described in Section 3.9.4.2 of this Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS), the contractor is required to prepare a Construction Management Plan (CMP) to address geologic and geotechnical constraints and resources and to minimize or avoid impacts to geologic hazards during construction, including the tunneling portion of the HSR Project. This CMP would address unstable and corrosive soils, soils with shrink-swell potential, groundwater withdrawal, subsidence, and erosion. As discussed in GEO-IAMF#10, also described in Section 3.9.4.2 of this Final EIR/EIS, the HSR Project design and construction must incorporate the guidelines, standards, and best practices of multiple manuals, publications, circulars, and codes from the American Association of State Highway and Transportation Officials, the Federal Highway Administration, the American Railway Engineering and Maintenance-of-Way Association, the California Building Code, the International Building Code, the American Society of Civil Engineers, the American Society for Testing and Materials, and California Department of Transportation (Caltrans) Design and Construction. Incorporation of and adherence to these guidelines, standards, and best practices will ensure that appropriate measures are in place during construction of the HSR Project to limit impacts on adjacent, nearby, and overlying properties. No revisions to this Final EIR/EIS have been made in response to this comment.

845-1490

This comment suggests that toxic pollutants will result in impacts to sensitive receptors in the project vicinity. Construction-related criteria pollutants and toxic air borne contaminants were assessed in Section 3.3.6.3. The Draft EIR/EIS, Section 3.3, Air Quality and Global Climate Change, provided a summary of the air quality impact analysis associated with the project, including the Burbank tunneling cut-and-cover segment (between the Burbank Airport Station and Victory Place). As shown in Table 3.3-22, the project would not result in a significant increase in cancer or noncancer health risk for receptors (including children) adjacent to the project site.

As described in Section 3.3.4.3, the project incorporated standardized HSR features to avoid and minimize air quality impacts. These IAMFs will substantially reduce emissions from the project.

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

Long-term health consequences of the project are not anticipated. Once operational, the project is expected to have a net benefit on regional air emissions. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 845 (Steven Goodman, Atlas Investments, LLC, August 18, 2020) - Continued

845-1491

The comment states that construction and operation of the proposed project on, around, or under Atlas Investments, LLC, property may cause disruption to one or more utilities that serve the property. Impacts to existing utilities in the RSA, which includes properties owned by Atlas Investments, LLC, 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 prepare a technical memorandum prior to project construction documenting how construction activities would be coordinated with service providers to minimize or avoid interruptions. This memorandum will be prepared in coordination with all utility providers with utility infrastructure that would be impacted by the proposed project, and Atlas Investments, LLC, would be included to ensure that all feasible measures are taken to avoid or minimize disruption to its properties. 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 addresses 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. No revisions to the Final EIR/EIS have been made in response to this comment.

845-1492

The commenter states that construction in the vicinity of their property at 2515 N. Hollywood Way may cause disruption to their tenant's business.

As described in Section 3.12.6.3, access to some neighborhoods, businesses, and community facilities may temporarily be disrupted from road closures and detours during construction. However, access to the neighborhoods, businesses, and community facilities would not be eliminated. If roadways require closure or relocation, alternate access would be identified, and detours would be provided prior to closure for continuity of access to neighborhoods.

Additionally, as detailed throughout this Final EIR/EIS, the project incorporates standardized HSR features to avoid and minimize project effects. These features are referred to as IAMFs and will be implemented during project design, construction, and operation, as relevant to the Burbank to Los Angeles Project Section, to avoid or reduce effects. These features are considered part of the project, and the EIR/EIS explains how they will work and describes their effectiveness. If significant impacts are determined to occur even with the implementation of IAMFs, feasible mitigation measures are identified and would be implemented as required under CEQA. As such, project impacts to any properties affected by the HSR Project would be avoided, minimized, or mitigated, as appropriate.

Property owners who believe they have suffered a loss may file a claim with the State of California Government Claims Board. More information may be obtained online at <https://www.dgs.ca.gov/ORIM/Services/Page-Content/Office-of-Risk-and-Insurance-Management-Services-List-Folder/File-a-Government-Claim>

Response to Submission 845 (Steven Goodman, Atlas Investments, LLC, August 18, 2020) - Continued

845-1493

Refer to Standard Response BLA-Response-Section 3.12 SOCIO-02: Impacts to Property Values.

The commenter states that construction in the vicinity of the HSR Project may reduce the value of their property and result in reductions in lease rates, and result in less attractive loan terms.

Section 6.3.4.1, Long-term Impact to Property Values, in the Community Impact Assessment (CIA) Technical Report summarizes the potential property value impacts of the HSR project (this report can be provided upon request to the Authority). Property value increases can result from both new access to an HSR transportation system and the associated intensification of development that can occur around station locations. However, given the potential for nuisance effects (e.g., noise and visual effects) resulting from operation of HSR trains, it is possible that some properties could experience a decrease in value. This potential for a decrease in property value may be particularly true for residences and businesses in locations considerably removed from train stations but exposed to nuisance effects of the HSR project. These non-station residences and businesses would enjoy relatively few benefits (mainly those deriving from improved accessibility) to offset the nuisance effects. This balance between the amount of benefit enjoyed compared to the nuisance effects would be unique for each property and would be only one of the many factors influencing the ultimate market value of any particular property.

Properties near the below grade alignment would experience fewer nuisance effects (e.g., noise and visual effects) resulting from operation of HSR trains.

As detailed throughout this Final EIR/EIS, the project incorporates standardized HSR features to avoid and minimize impacts. These features are referred to as IAMFs and will be implemented during project design and construction, as relevant to the Burbank to Los Angeles Project Section, to avoid or reduce impacts. These features are considered part of the project, and the EIR/EIS explains how they will work and describes their effectiveness. If significant impacts are determined to occur even with the implementation of IAMFs, feasible mitigation measures are identified and will be implemented as required under CEQA. The Authority will implement IAMFs during

845-1493

project design, construction, and operation. As such, project impacts to any properties affected by the HSR Project would be avoided, minimized, or mitigated, as appropriate.

Property owners who believe they have suffered a loss may file a claim with the State of California Government Claims Board. More information may be obtained online at <https://www.dgs.ca.gov/ORIM/Services/Page-Content/Office-of-Risk-and-Insurance-Management-Services-List-Folder/File-a-Government-Claim>

845-1494

The commenter states that the project will result in noise impacts at their property during construction and operation. Consistent with the FRA's High-Speed Ground Transportation Noise and Vibration Impact Assessment Manual (FRA 2012), the noise impacts to the areas near 2515 N Hollywood Way described in Section 3.4, Noise and Vibration, were classified as no impact as the noise levels did not exceed the thresholds shown in Figure 3.4-2. No mitigation is necessary for receptors classified as no impact. No changes have been made to the Final EIR/EIS in response to this comment.

845-1495

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 regarding construction and operational traffic impacts near their property. 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 discussed in Section 3.2.4.2, a CSTMP will be implemented as part of the project as TR-IAMF#2 will address construction detour routes, property access, lane and sidewalk closures, and minimization of localized impacts. This will be included in the construction plans to be reviewed by local jurisdiction.

Response to Submission 845 (Steven Goodman, Atlas Investments, LLC, August 18, 2020) - Continued

845-1496

Consistent with the FRA's High-Speed Ground Transportation Noise and Vibration Impact Assessment Manual (FRA 2012), the vibration impacts to the property areas near 2515 N Hollywood Way described in Section 3.4, Noise and Vibration, were found to be below the vibration criteria related to both damage and annoyance potential in Table 3.4-10. No mitigation is necessary for this property. No changes have been made to the Final EIR/EIS in response to this comment.

A noise and vibration mitigation plan for the construction is required before construction can start, this will address any noise or vibration issues from construction to the property and show how the contractor will mitigate any noise and vibration issues.

845-1497

As noted in Section 3.10.6.3 of this Final EIR/EIS, engineering controls would be applied to contain emissions. These controls may include, but would not be limited to, emission control for diesel off-road equipment and diesel generators, dust control through wetting or covering, short- and long-term ambient air monitoring in neighborhoods near and downwind from the construction or maintenance sites, and field olfactory measuring and quantification of odor strength in the ambient air. The HSR Build Alternative would comply with all other applicable federal, state, and local regulations, as well as with HMW-IAMF#6, HMW-IAMF#7, and HMW-IAMF#8 to reduce odors and other impacts resulting from construction of the proposed project.

No changes to this Final EIR/EIS were made in response to this comment.

Furthermore, operation and maintenance of the HSR Build Alternative would involve the use and generation of only small amounts of hazardous substances for the routine maintenance of stations. In addition, HMW-IAMF#9 includes procedures to limit the use of hazardous materials by replacing hazardous substances with nonhazardous materials, and HMW-IAMF#10 includes procedures to reduce the potential for hazardous substances releases through preparation and implementation of hazardous materials monitoring and spill prevention plans. HSR train operations would have no odors because the trains will operate on electric power.

845-1498

The commenter states that construction in the vicinity of their property may limit future development or the types of uses they can have at their property.

As detailed throughout this Final EIR/EIS, the project incorporates standardized HSR features to avoid and minimize impacts. These features are referred to as IAMFs and will be implemented during project design and construction, as relevant to the HSR Project section, to avoid or reduce impacts. These features are considered part of the project, and the EIR/EIS explains how they will work and describes their effectiveness.

If significant impacts are determined to occur even with the implementation of IAMFs, feasible mitigation measures are identified and implemented as required under CEQA. The Authority will implement IAMFs during project design, construction, and operation. As such, project impacts to any properties affected by the HSR Project would be avoided, minimized, or mitigated, as appropriate.

The property referenced at 2515 N. Hollywood Way would be affected by a temporary construction easement and permanent easement (access road, freight rail relocation, HSR tracks).

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

Response to Submission 845 (Steven Goodman, Atlas Investments, LLC, August 18, 2020) - Continued

845-1499

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

The commenter requests detailed site and construction plans that clearly show how the cited property is affected, when, and for how long. Detailed construction plans are not available at this stage of the project. However, preliminary design plans are provided in Volume 3 of this Final EIR/EIS. Additionally, the Authority coordinated with the commenter in August 2020 and provided all of the information regarding the design as was publicly available at the time. The Authority will work with the affected property owner as described in BLA-Response-Section 3.12 SOCIO-01: Relocations, ROW Process, Eminent Domain.

Submission 639 (Karen Barnett, Atwater Village Neighborhood Council, June 16, 2020)

Burbank - Los Angeles - RECORD #639 DETAIL

Status : Action Pending
Record Date : 6/16/2020
Submission Date : 6/16/2020
Interest As : Business and/or Organization
First Name : Karen
Last Name : Barnett

Stakeholder Comments/Issues :

639-658

A request was received by the outreach staff for 3 thumb drives with the Draft EIR to be sent to the Chair at the Atwater Village Neighborhood Council. Ms. Barnett was struggling with opening the environmental document online.

Response to Submission 639 (Karen Barnett, Atwater Village Neighborhood Council, June 16, 2020)

639-658

The commenter requested electronic copies of the Draft EIR/EIS on thumb drives. On June 16, 2020, the commenter was sent electronic copies of the Draft EIR/EIS. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020)



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AVNC Officers Co-Chairs: Courtney Morris, Edward Morrissey • Treasurer: Josh Hertz • Secretary: Karen Knapp

Submitted via email: Burbank_Los_Angeles@hsr.ca.gov re: "Draft EIR/EIS Comment"

Dear Burbank High Speed Rail Authority,

The Atwater Village Neighborhood Council has greatly appreciated the High Speed Rail Authority (HSRA)'s respectful and conscientious outreach efforts over the past several years, culminating in this document. We can clearly see that the HSRA has been listening and addressing our concerns, resulting in an improved project for all. Specifically, we appreciate the HSRA's working to modify the at-grade crossing at Chevy Chase Drive with the pedestrian underpass and the at-grade crossing at Goodwin Drive.

850-1513

While the High Speed Rail project, when complete, will enhance mobility and connection between communities throughout California, the impacts on our small neighborhood of the project and its construction threaten to leave our community even more isolated and transportation-poor than it is today, while failing to accrue complementary benefits or HSR goals as stated in the DEIR,

We list below the considerable impacts to Atwater Village from property taking, construction, street closures and more; what we cannot list nearly as extensively are benefits that our neighborhood can expect to enjoy. If High Speed Rail is implemented in our neighborhood as the current Draft Environmental Impact Review describes, it threatens to create the yet one more barrier around our community, compounding the disconnection already felt from the LA River and the 5 freeway on our western edge, the 2 freeway on our southern edge, and the 134 freeway on our northern edge.

We believe that not enough has been proposed to mitigate or even fully delineate the considerable impacts High Speed Rail and its construction will have on Atwater Village. Just as importantly, there is much more that can and must be done to ensure that Atwater Village residents have access to the new rail line and the substantial benefits it brings to the region.

The following are mitigation measures and investments that we believe are feasible and commensurate to the impacts our neighborhood will feel from this project. If all of these investments are implemented, High Speed Rail will constitute an opportunity, and not a burden, to Atwater Village:

850-1514

1. Frequent, reliable and rapid access to High Speed Rail for Atwater Village Residents: we understand the reasons for not having High Speed Rail stop at the Glendale Station. However, considering the substantial impacts of this project on Atwater Village, there must be a solution to bring Atwater Village residents to Burbank and Union stations conveniently. Either a solution must be made to bring Atwater Village residents to the Glendale Station more directly to catch Metro/Metrolink service to Burbank or Union Station, or a shuttle service must be provided. Since residents of Seneca Avenue oppose the construction of a path between their properties, perhaps an underground tunnel might be an appropriate option. Or, more feasibly, regular shuttle service must be provided to the residents of Atwater Village, with at least 1 stop each in North, Central and South Atwater, and enabling residents to access Burbank or Union Station for

850-1514

any High Speed Rail arrival or departure reliably and more quickly than by driving, and without multiple transfers. This will require coordination with Metro and/or LADOT to operate the service and ensure that it benefits from priority and separation from traffic, in order to ensure that HSR doesn't generate additional car trips. Anything less would be an injustice to our neighborhood.

850-1515

2. There should be a multi-use pedestrian and bicycle trail on the West Side of the HSR Corridor right-of-way with greening and shade, extending along the tracks from the Verdugo Wash to the future park at the Bowtie Parcel. This would mitigate the lack of local connectivity and provide access to public transportation to rail when combined with an overpass/underpass to Glendale Station.

850-1516

3. Sound Walls extending the full length of Atwater Village: The Draft EIR currently only details plans for a sound barrier between San Fernando Ct and Glendale Boulevard and a partial sound barrier in South Atwater. Specifically, the plans for a sound barrier south of Glendale Blvd terminate at Silver Lake Boulevard, leaving many businesses and residents in South Atwater, the most populous section of our neighborhood, unprotected from the noise of the train. This aggravates an existing impact to the community. We believe this is unfair and burdensome to our community members in South Atwater. Casitas Avenue, the street closest to the tracks, consists of several dense multi-family dwellings as well as single-family homes and a complex with restaurants, theatres, and offices. The patio of one restaurant has nothing but a fence and climbing vines between diners and the train tracks. Those residences and businesses, and the entirety of the neighborhood, should be protected from the noise of the trains. North Atwater from Los Feliz to Doran will include a two-mile-long siding for freight traffic; the planned doubling of freight activity; and increased MetroLink/Metro operations. All of those elements will increase noise, visual blight and impact to residents, businesses and Chevy Chase Recreation Center and Park. The sound barrier in South Atwater should extend the full length of the neighborhood down to the Bowtie Parcel.

850-1517

4. Students of Glenfeliz Elementary living in North Atwater used to be able to take a bus to school from Chevy Chase Recreation Center. This service should be restored, in coordination with LAUSD and LADOT, to mitigate increased pedestrian risk due to construction traffic, and increases in vehicle traffic along Brunswick after grade separation is complete.

850-1518

5. If any segments of purchased properties are undeveloped after construction, they should be returned to the community, which should have the power to decide their use.

850-1519

6. Street/sidewalk improvements that follow the community plan/river master plan including permeable pavement/impactful flood mitigation should be installed throughout the neighborhood.

850-1520

7. Native trees and/or greenery should be planted next to any structures that are taller than the train; the infrastructure should not be an eyesore for Atwater Village. The HSR rail corridor is also a utility corridor. This creates an additional visual eyesore with 25' cantilever structures which currently do not exist in the line of sight.

850-1521

8. Soundproofing must be installed around all switchers and transformer stations to protect Atwater Village residents from noise pollution.

850-1522

9. Upgrades to Chevy Chase Recreation Center: This is the only recreation center in Atwater Village, and comprises the majority of the indoor public space available in our community (with the exception of schools, which are not generally available to members of the public). The project will render it less accessible for many during construction and even after completion. A community benefit of enhanced recreational facilities and a dedicated community meeting room would substantially offset this impact.

Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1523

10. First Responders substation near Goodwin Ave w/Swift rescue team: The DEIR fails to note the significant changes to access in North Atwater Village by the Metro Doran Street and Broadway/Brazil Grade Separation project. Placing a substation in this area will increase the safety of the industrial area, which will be isolated by the river and rail corridors, accessible through only one street, San Fernando West, reached by bridge or overpass, through the City of Glendale. This would provide additional safety to the residential, equestrian, and business communities locked in the corridor south of Goodwin Ave. The cumulative impacts of Rail and River projects will make North Atwater Village a construction zone for decades. Increasing public safety is vital to all current and future projects.

850-1524

11. Maintenance for any changes made at Goodwin, Chevy Chase or any other street: So that the community is not impacted by changes for the HSR Corridor, HSR needs to create a long-term maintenance plan along the rail corridor to prevent dumping, and to realize benefits through beautification and ongoing maintenance along the corridor, overpasses, underpasses and closed streets.

850-1525

12. Utilities along the corridor: With the addition of 25' tall supports for overhead catenary every 200-250 feet, the visual landscape will be substantially altered. This change can be mitigated by ensuring that all overhead utilities which are relocated during the project are replaced with underground wiring.

850-1526

13. Work with the Army Corps of Engineers to clean out the river - construction could affect the cleanliness/quality of the river as well as vibration from the trains. Fish are extremely sensitive to vibrations. We ask that HSR mitigate this risk by collaborating with USACE on a plan to provide preventive maintenance to the riverbed.

850-1527

14. Extend the recycled water to the sidewalks so trees can be irrigated after they are planted: To mitigate the potential visual impacts, as well as noise, heat islands, and other potential infrastructure impacts, we ask that HSR provide a community benefit to ensure our street trees remain healthy and provide the cover needed for health and well-being.

850-1528

15. Public Art: with the addition of sound walls and utility structures in our community, we foresee the possibility of an increase in graffiti and visual blight. A strong investment in public art, hiring local Atwater Village and Northeast Los Angeles artists, to install murals and mosaics along such walls will deter vandalism and improve the community. This community benefit should include a long-term maintenance plan for such art, especially murals.

850-1529

16. Ongoing maintenance as necessary (tree-watering, etc.) for all of the above.

Analysis of Impacts

The HSR DEIR underreports the impacts to the Atwater Village. The assumption that the Sperry/Salem overpass and required Verdugo Wash overpass will be built prior HSR to construction impacts our ability to address and receive mitigation measures for impacts arising from: transportation changes, construction impacts, environmental impacts, aesthetics and view impacts and community cohesion and isolation.

CEQA gives the community a voice in land use decisions. It requires decision-makers to adopt alternatives or mitigation measures to reduce significant adverse environmental impacts. As such, it plays a critical role in preserving and enhancing California's public health, safety, and the environment.

The Act was designed to ensure that a project applicant—not the public—bears the costs of providing the necessary infrastructure to support a project. It also provides the public and decision-makers with

850-1530

"the big picture" and helps ensure that many small projects are not considered separately, only to overwhelm a community when taken as a whole. (<https://www.pcl.org/campaigns/ceqa/ceqa-faqs/>)

The HSR line is not operational without the Los Angeles County Metropolitan Transportation Authority (Metro) project "Doran Street and Broadway/Brazil Grade Separation". In March 2019, Metro applied for and received a NOE - Notice of Exemption for the Doran Street and Broadway/Brazil Grade Separation. As of today, the MTA Board has not yet approved total project budget and schedule (<https://mtadash.mlmprojectservices.com/projects/66318#/scope>).

The choice to divide the North Atwater Village segment between Metro and HSR is a social injustice in itself and runs counter to the intent of CEQA, by subverting the community's ability to evaluate the impact of the project on our lives.



For the rail corridor to be functional all the projects must be built within less than four(4) miles of our communities' eastern border (Glendale/Los Angeles). None of these projects connects us as a community to each other. Most of the projects have bike and pedestrian access, but there's a lack of connectivity for the community to safely access these opportunities for alternative transportation.

Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1530

Construction Impacts:

A generation of Atwater Village residents will be affected by the cumulative construction projects for this section of the corridor. There are more than 12 major projects in less than four miles, ten of which will impact North Atwater, the two mile section from Doran St. to Los Feliz Blvd. While some projects are technically in the City of Glendale, the visual, demolition and construction impacts are felt most by Atwater Village as it is an isolated land mass along the west side of the rail corridor.

This project will take more than a half-mile of property along the corridor. This does NOT include the properties which will be needed for the METRO Doran Street and Broadway/Brazil Grade Separation projects.

HSR Rail Corridor Projects impacting Atwater Village:

- Verdugo Wash Overcrossing J-Hook (NEW/Metro project)**
- Doran Street: At-Grade Closed (NEW/Metro project)**
- Salem/Sperry St: Overcrossing (NEW/Metro project)** (reference as proposed in technical documents: ex p59, 06.BLA_PEPD_Record_Set_Vol2_Aerial_Structures_Tunnels_Retaining_Walls.pdf)
- Brazil Street/Broadway: At-Grade Closed (NEW/Metro project)**
- Riverwalk Path Bridge: LA River/Verdugo Wash Bridge (NEW/Metro project)**
- Doran Street: San Fernando Rd. pedestrian Overpass (NEW/Metro project)**
- Colorado Street: Undercrossing (modified)**
- Goodwin Avenue: Undercrossing (new)**
- Chevy Chase Drive: At-Grade Closed**
- Chevy Chase Drive: Pedestrian Undercrossing (new)**
- Los Feliz Boulevard: Undercrossing (modified)**
- Storage Etc: Demolition rerouting of rail line (new)**
- Glendale Boulevard: Undercrossing (modified)**
- Fletcher Drive: none**

These major projects do not include the proposed:

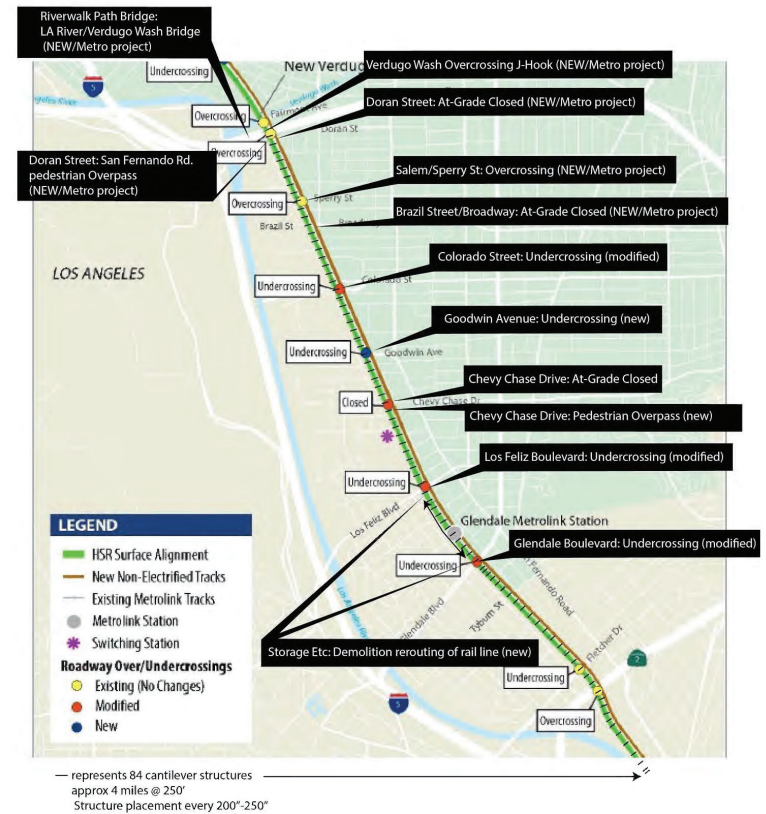
- Doran St:
 - Stand alone Communication tower (SEE VOL 4 DWG NO. CO-04003)
 - Signal house (SEE VOL 4 DWG NO. TC-04104)
- West San Fernando Rd (mid): Stand alone Communication tower (SEE VOL 4 DWG NO. CO-F4002)
- Verdant/New Life Vision Church: Switching Station (SEE VOLUME 4 DWG NO. TP-04101)
- South of Glendale Blvd/Hehr International Inc.: Signal house (SEE VOL. 4, DWG. NO. TC-04106s)
- South of Glendale Blvd/Hehr International Inc.: Communication tower (SEE VOL. 4, DWG. NO. CO-F4004)
- South of Glendale Blvd/West Casitas LLC: Interlocking site (SEE VOL. 4, DWG. NO. TC-04002)
- South of Glendale Blvd/West Casitas LLC: Interlocking site (SEE VOL. 4, DWG. NO. TC-04003)

The required HSR electrical needs will permanently change the Atwater Village view:
 Overhead contact system (OCS): A simple two-wire system consisting of a messenger wire and a contact wire that are supported by cantilever structures and attached to poles installed alongside the rail tracks.

- Cantilever Structures: 84 to 105 along the Atwater Village border
- Placement 200-250' (approx. four miles: 21,120 ft)
- Cantilever Structure (2 sets for each set of tracks): approximate area 42'
- Cantilever Structure Height: OCS Pole height 30'

850-1530

Contact wire: continuous with an approximate height 25'



The DEIR construction schedule assumes all projects will happen simultaneously. That is not possible due to the number and scale of the projects in North and Central Atwater Village. In North Atwater, if all projects were to happen concurrently there would be no in and out entry for demolition and construction, let alone the residents, businesses or emergency responders. We assume the major projects will have a timeline of three to seven years. If we use three years for every project on this map, assuming that some will take longer and others shorter, Atwater Village will be impacted by 39

Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1530

construction-years of project(s) preparation, demolition and construction. This is not including the proposed interlocking sites, signal housing, communication towers and switching station.

After the major projects are completed the rails would be laid down then the electrical system cantilever and wire structures would need to be constructed. When we look at this length of time, the cumulative projects in Atwater Village, every community member in Atwater Village will be impacted by the HSR project. Some severely with demolition noise, construction noise, related vibrations, in and out bound trucks, multiple (unknown) haul routes and related occurrences, all community members will experience detours, traffic and diminished quality of life for a substantial period of time, years.

850-1531

Currently, Atwater Village residents live next to the LA River (Flood Control Channel) which is fenced, in most areas and has high tension electrical towers running its length. We want to ensure that the HSR rail corridor does not mimic the LA River with fences, power lines and lack of connectivity. The residents of Atwater Village should not be imprisoned by infrastructure.

850-1532

Further, census tracts comprising much of Atwater rank in the 95-100% percentile of the CalEnviroScreen, meaning that they are in the top 5% of environmentally burdened census tracts in the State of California. Subjecting communities that are already suffering from extreme levels of environmental injustices to further construction, congestion and isolation without any significant mitigation or access to the High Speed Rail itself would be unacceptable.

Cumulative impacts:

“The cumulative impacts analysis considers planned development in the cities of Burbank, Glendale, and Los Angeles. Specifically, this analysis considers the list of reasonably foreseeable development plans and projects, transportation and transit projects, utility projects, bridge rehabilitation projects, and sewer projects listed in Volume 2, Appendix 3.19-A.”

The HSR Build Alternative would result in a redistribution of traffic from changes in the roadway network and from additional trips to and from the station areas. During operation, the HSR Build Alternative, combined with the other cumulative projects, would result in LOS impacts under NEPA on 24 intersections and 7 roadway segments along the Burbank to Los Angeles Project Section alignment. TRAN-MM#2 includes improvements to intersections along the alignment to reduce the delays and improve LOS at affected intersections. However, due to right-of-way and physical constraints, mitigation is not being considered to reduce the impacts at the 7 intersections and 1 roadway listed below, and a cumulative impact would remain under NEPA at these locations. Therefore, the HSR Build Alternative would result in a cumulatively considerable traffic impact under NEPA.

The DEIR acknowledges only one intersection “San Fernando Road at Chevy Chase Drive (2029 and 2040 a.m. and p.m. peak hours)” that the HSR Build Alternative would result in a cumulatively considerable traffic impact under NEPA

850-1533

The DEIR cumulative impact section does not include all the known projects within Metro’s “Doran Street and Broadway/Brazil Grade Separation” (Table 3.19-2 Cumulative Transportation and Transit Project List) Since they do not currently exist and will have to be built for the HSR rail corridor to be functional, they should be included and analyzed in the cumulative impact section of this project DEIR. These projects will be built in a 1-mile area of North Atwater Village (Los Angeles) and the City of Glendale: **Verdugo Wash** Overcrossing J-Hook (NEW/Metro project) **Doran Street:** At-Grade Closed

850-1533

(NEW/Metro project) **Salem/Sperry St:** Overcrossing (NEW/Metro project) **Brazil Street/Broadway:** At-Grade Closed (NEW/Metro project), **Riverwalk Path Bridge:** LA River/Verdugo Wash Bridge (NEW/Metro project), **Doran Street:** San Fernando Rd. pedestrian Overpass (NEW/Metro project).

We believe that a full analysis can’t be made without including the Metro’s “Doran Street and Broadway/Brazil Grade Separation” projects which impact the HSR corridor construction and operational timelines. This section is flawed under CEQA and NEPA requirements, these projects will bring more: traffic, construction, noise, vibration and air quality impacts at a minimum. In addition, there could be hazardous materials located at one or more of these sites. Without inclusion of these projects there is no relief for the Atwater Village community.

5.8.5 Environmental Justice Effects

“All populations close to the project footprint, including minority and low-income populations as well as nonminority and non-low income populations, would experience these impacts. The context and intensity of these impacts would be similar for minority and low-income populations as well as non-minority and non-low income populations. Therefore, the HSR Build Alternative would not result in any disproportionate impacts on low-income and minority populations.”

850-1534

Atwater Village is heavily impacted by required HSR projects. We include the missing projects in the Metro “Doran Street and Broadway/Brazil Grade Separation” and the impacts of the San Fernando Rd. Transit Oriented Communities (TOC) (*KEEP/DELETE: still active City of Glendale’s San Fernando Road Corridor Redevelopment Project Area*) on Atwater Village.

There should be a complete and full analysis of all the projects and impacts, temporary and permanent, on the community of Atwater Village for a realistic assessment of burden and benefits in the environmental justice section. Specifically, in this section the combined impacts of projects from HSR and METRO, and the Glendale TOC adverse effects include those for the following environmental resources: air quality, noise and vibration, transportation/traffic, displacements/relocations and community cohesion, and aesthetics/visual resources. Then a corrected assessment of operation impacts would need to be provided.

850-1535

We acknowledge that the HSR team worked with the community to reduce the taking of residential housing. There have been little efforts to improve community connectivity, improve local safe access to public transportation (especially the “benefits” of local, regional or statewide rail), provide alternative safe transportation options or safe routes to the bike/pedestrian facilities in planned HSR or Metro projects.

Atwater Village will be forever changed by the future HSR Rail Corridor.

Community Cohesion:

Atwater Village is an isolated community, surrounded by infrastructure, and at the City of Glendale/Los Angeles border. During the process leading up to the HSR DEIR, at community stakeholder meetings, we had to stand up to be recognized at a community (in Los Angeles) on HSR maps, in addition to demanding information on projects impacting the community along the HSR corridor.

This DEIR notes this in the areas of controversy S.10.1 (Burbank to Los Angeles Project Section Draft EIR/EIS Page S-57) Isolating impacts from street closures on adjacent communities specifically and we

Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1536	<p>are also a community along the HSR alignment already burdened with much of the area's existing and planned infrastructure. The DEIR doesn't go far enough in acknowledging the impacts to the community of Atwater Village.</p> <p>As noted in the DEIR:</p> <p>Finally, several NCAs in the city of Los Angeles that are within the communities and neighborhoods impacts RSAs have residential areas that are linked to commercial areas and public facilities that help define them as unique communities. Of these, the Atwater Village and Lincoln Heights NCAs appear to have the most residential areas in close proximity to various types of public facilities, such as schools and parks, and to commercial areas, which would point to stronger degrees of community cohesion for these neighborhoods. As discussed above, while the presence of residences, businesses, and important community facilities that are adjacent to each other or otherwise linked, as well as mobility/access between these key areas, are qualitative factors that indicate cohesion within a community, quantitative factors such as demographic statistics also indicate ties that hold a community together. (Page 5-20 Burbank to Angeles Project Section Community Impact Assessment)</p>	850-1540	<p>implementation of signalized intersections within the parking lot and/or circulation improvements.</p>
850-1537	<p>Atwater Village does have a strong sense of community, in spite of the fact that it is isolated. We have concerns of further community divisions physical and visual, temporary and permanent could impact the unity Atwater Village residents feel. Currently, along the LA River which is also a dividing corridor there are efforts to connect the North, Central and South Atwater Village along the east bank. These efforts are to undo the historic splintering of our community done in the early to late 1900s.</p> <p>in this day and age, the HSR corridor should not continue to divide along the route but address and provide connectivity for Atwater Village residents</p> <p>Specific site concerns:</p>	850-1541	<p>The project proposes to take four parcels on Casitas Ave. between Glendale Blvd. and Fletcher Dr. All lots affected (3445, 3403, 3265, 3145) are coded as currently in use as surface parking. The project should address the following concerns:</p> <ul style="list-style-type: none"> • The parcel slated for taking at 3265 Casitas includes an area which is built up. Permanent interlocking, radio, or power facilities are slated to be installed there; however, it is unclear if this will require that the Atwater Village Theater complex be demolished, as the Interactive Map lists the entire taking to be a parking lot, while only half of it actually is. • The TCE on the 3265 lot encompasses an entire parking lot that serves the site. If the theater isn't demolished, it is unclear whether that parking will be usable during normal theater-going times, or what impact this will have on the theater companies that use this space. • The four lots, together, comprise approximately 35,000 square feet of parking being removed from this highly-trafficked section of the neighborhood, or a loss of approximately 100 parking spaces. This street is unusual in that there is residential property, both single-family homes and multifamily apartments and condos, on one side, with light industrial on the other. Much of the light industry has in recent years been converted to more active uses such as theaters, galleries, workshops, and restaurants. Parking on this street is already extremely crowded. The loss of parking should be mitigated in a way that protects the residents and businesses, but does not encourage additional vehicle use. An example of such a mitigation would be a hybrid metered/permit zone, where residents can buy annual permits, and visitors would pay at metered parking which is right-priced to achieve an average 7% availability during peak times. Additionally, increased access to transit, especially during evening hours when theaters and restaurants are most in use, will assist in mitigating the loss of parking. <p>Additional issues or omissions are listed below:</p>
850-1538	<p>The project proposes to take property from New Life Vision Church (no address listed on the interactive map; however, the church has since been assigned 2861 Los Feliz Blvd. as an address) for construction easement, permanent systems infrastructure, and an access road. There are several unaddressed issues with this taking:</p> <ul style="list-style-type: none"> • The Interactive Map tool lists the property as a "vacant lot;" however, the church completed construction some time ago and is currently in use. It is unclear if the building will be left standing or will be usable during the construction. 	850-1542	
850-1539	<ul style="list-style-type: none"> • A Q condition currently bars entryways to this lot (and adjacent lots comprising the Franciscan Metro Center) other than those on Los Feliz Blvd. to be used for other than emergencies. Plans show an access road to be entered off of Verdant St., which would violate this Q condition unless the access road is to be used only for emergency access, rather than for routine access. 	850-1543	
850-1540	<ul style="list-style-type: none"> • An adjacent lot in the center of the surface parking area for the Franciscan Metro Center complex is labeled as a temporary construction easement, and appears to take up a significant parking area of a complex that is often crowded, especially on weekends. HSR should address the impact of this taking on the parking and traffic patterns at the Franciscan Metro Center. The requirement that traffic entering the center from Los Feliz be unimpeded, having right-of-way over traffic within the lot, currently causes delays and safety issues to both pedestrians and vehicles, and will only get worse with the taking. The Impacts may be mitigated by the 	850-1544	<p>Chevy Chase Closure Pedestrian/Bike access: naming conflicts in the DEIR Chevy Chase access is stated as undercrossing in doc: PROPOSED CHEVY CHASE DRIVE PEDESTRIAN UNDERPASS SEE VOL 3 DWG NO. ST-K1113 it's a bridge in another area: PROPOSED BRIDGE STRUCTURE SEE DWG. VOL 3, ST-K1113. We assume it's a bridge, overpass for pedestrians and bikes. Please confirm and correct the document.</p>
		850-1545	<p>Appendix 3.12-C, page 17, Safety and Security: The HSR needs to clarify what measures will be taken to ensure that "the general public would not have access to construction areas". We are aware of frequent issues along the tracks just south of Fletcher, where both unhusosed residents and students have crossed through damaged fences to get onto the rail right-of-way. Students traveling to Irving Middle School take this "shortcut" across the tracks instead of going around to the Fletcher underpass; unhusosed residents seek camping areas that afford more privacy and are out of the public right-of-way on sidewalks.</p>
		850-1546	<p>Appendix 3.12-C, page 18, Parks, Recreation, and Open Space: Permanent impacts to Chevy Chase Recreation Center and Park are dismissed here as inconsequential. This does not assess the impact of closing the railroad crossing just 250 feet from the park entrance. While the plans include a pedestrian and bicycle underpass to replace the current vehicle crossing, an assessment of the impact of this</p>

Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1546 | closure on access to the only recreation center in Atwater Village needs to be completed before we know whether additional mitigation is required.

850-1547 | Appendix 3.12-C, page 20, Hazardous Materials and Wastes: The acknowledged "minor amounts" of hazardous materials does not appear to account for the "high priority" Superfund site at Franciscan Metro Center, where construction of an interlocking, radio, or power facility site is planned.

850-1548 | Appendix 3.12-C, page 11, Parks and Recreation Resources: This list omits the Glenhurst Pocket Park in South Atwater.

850-1549 | Appendix 3.12-A, sheets 4 and 5 of 8: Chevy Chase Park is indicated as an Early Childhood Center, but it is also a park. There is no green triangle to indicate the park. North Atwater Park and Bond Park are indicated separately from Griffith Park. Glenhurst Park is indicated.

850-1550 | Appendix 4-A, page A-19: Discussion of impact to Chevy Chase Park and Recreation Center should include the change in access with the closure of the Chevy Chase at-grade crossing. An analysis of the traffic flow for people using this park is an important component of a full understanding of the project impact.

850-1551 | Chapter 4: section 4(f) and 6(f) evaluations: Chevy Chase Park is listed as having a "moderate" increase in noise from 63 to 65 dBA; however, while the increase in volume is moderate, there is no discussion of the increase in frequency of noise, which will have an impact.

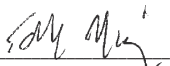
850-1552 | Community Impact Assessment, Appendix C: Chevy Chase Recreation Center is not listed or discussed.

In conclusion, while Atwater Village recognizes the enormous overall benefits from the HSR project, and looks forward to its funding and completion, we believe that the impact of construction and the project on our community has been dramatically understated and needs to be mitigated with significant community benefits, and steps to guarantee that the benefits of a High Speed Rail connection accrue to communities, such as ours, that it travels through.

We also would like to state that this is not a complete assessment of the Draft EIR, as the many hundreds of pages spread across nearly 100 files are simply beyond our capacity as an uncompensated public board to fully evaluate in the time given, especially without the ability to review paper copies of illustrations meant to be viewed at sizes much larger than a computer screen. The HSRA has worked to help us navigate and find the information we need, but we must acknowledge that the abbreviated window is not adequate for a complete commentary on this draft environmental impact report. We hope that future opportunities will be of a length that does justice to the tremendous amount of work involved in bringing High Speed Rail to fruition in Southern California.

850-1553 | Thank you.

850-1530 | _____
Courtney Morris
Co-Chair



Edward Morrissey
Co-Chair

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020)

850-1513

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

The commenter inquires about strategies to encourage transit-oriented development (TOD) near the Burbank Station. As discussed in Section 3.13.6.3 of this Final EIR/EIS, development of the HSR Build Alternative and provision of HSR services could have the indirect effect of stimulating TOD in the vicinity of proposed station areas. Combined with strong real estate market conditions, improved transit service (such as HSR) can attract public and private investment that accelerates the rate of development anticipated in adopted station-area plans. Where major changes in land development near stations (typically within 0.25 mile) have occurred concurrently with the development of new transit facilities, jurisdictions with supportive policies, land use controls, and direct incentives can facilitate TOD (Transit Cooperative Research Program 2004). The referenced study considered development within 0.25 mile of the station for the typical light-rail transit project. However, HSR service would attract a new market of intercity travelers because the system would provide new statewide accessibility to jobs, services, and housing, connecting the centers of the state's economic regions. HSR stations could have a stronger influence on local government planning for station-area land use than commuter and light rail; accordingly, HSR station-area development guidelines developed by the Authority focus on development occurring within 0.5 mile of a station. Furthermore, Burbank and Los Angeles planning documents including the City of Burbank General Plan Land Use Element (2013) and Mobility Element (2013); City of Los Angeles General Plan Land Use Element (2001); and City of Los Angeles Mobility Plan 2035 (2015), support the development of HSR stations because they would increase connectivity and support planned growth. No revisions to the Final EIR/EIS have been made in response to this comment.

Refer to Responses to Comments 850-1514 through 850-1529, contained within this chapter.

850-1514

The commenter requests a shuttle service for Atwater Village residents to access the proposed stations in Burbank and Los Angeles.

The analysis in the TTR found that the project would have no adverse impact on existing transit services that provide access between Atwater Village and Burbank and Los Angeles, and therefore no mitigation is required. The specific mitigation measure suggested, in other words, is directed at an impact that is not considered significant under CEQA. A new transit service might be established by another entity to connect Atwater Village to a HSR station, but if so it would be done outside the context of the Authority's environmental review of the HSR Project and in the realm of normal transit planning instead. No changes have been made to the document as a result.

850-1515

The commenter requests a multi-use pedestrian and bicycle trail on the west side of the HSR corridor right-of-way to connect to the future park at the Bowtie Parcel. The HSR Build Alternative does not include additional bicyclist/pedestrian improvements at this location and does not acquire property on the west side of the HSR alignment to provide for construction of a bike path. Additionally, although local agency plans do not include plans for a bike path that extends from Verdugo Wash to the future park at the Bowtie parcel, the City of Burbank has a planned Chandler Bikeway that connects to the proposed Burbank Western Channel Bike Path which then connects to the existing Burbank Western Channel Bike Path that terminates just south of the Glendale city boundary. As stated in Section 3.15.3 of this Final EIR/EIS, through implementation of 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 would 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. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1516

The commenter suggests a new mitigation measure, which is directed towards noise impacts in the area of South Atwater. As explained further below, these noise impacts are not considered significant and unavoidable under CEQA.

As the commenter suggests, and as shown on Figure 3.4-10 of this Final EIR/EIS, the proposed NB No. 1 along the southbound side of the HSR tracks extends from Fernando Court to south of Glendale Boulevard. While there are residential uses farther south of Glendale Boulevard, the noise impact analysis determined that none of the impacts to those residences would be classified as severe. Therefore, consistent with the Authority's Noise Mitigation Guidelines (Appendix 3.4-A), the barrier was designed to protect receptors that are expected to be severely impacted. Future planned and committed projects that may influence the future noise and vibration environment, including with respect to park facilities, are described in Section 3.19, Cumulative Impacts. No changes have been made to the Final EIR/EIS in response to this comment.

850-1517

The commenter requests restored access of bus service from Glenfeliz Elementary to Chevy Chase Recreation Center to mitigate impacts to pedestrians from construction. As discussed in Section 3.2.4.2 of this Final EIR/EIS, maintenance of existing transit and pedestrian access will be provided as part of TR-IAMF#2, Construction Transportation Plan, and TR-IAMF#4, Maintenance of Pedestrian Access. The Authority does not plan to add transit services as betterments as that is outside of the Authority's jurisdiction.

850-1518

The commenter states that if any segments of purchased properties are undeveloped after construction, they should be returned to the community.

As described in Section 3.13.6.3, following construction of the HSR Build Alternative, the Authority would review the property acquisitions and evaluate whether all acquired land extending outside the area required for operation and maintenance of the HSR Build Alternative is needed. 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 the Authority. The Authority may sell the property to an adjoining landowner if it meets the criteria specified. The Authority may sell the property to municipalities or other local agencies at their request, without calling for competitive bids, at a price representing the fair market value thereof, and upon a determination that the intended use is for a public purpose. If it is improved property, the property may be sold to a former owner who has remained in occupancy or to a residential tenant of a tenure of five years or more with all rent obligations current or paid in full. 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 develop with uses in accordance with applicable local government land use plans and regulations.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1519

The commenter requests installation of street/sidewalk improvements throughout the neighborhood that follow the Atwater Village Community Plan/Los Angeles River Master Plan and that those improvements include permeable pavement/impactful flood mitigation. Improved street and/or sidewalk improvements would be developed only where such facilities would be affected by the HSR Build Alternative. It is outside of the Authority's purview to install improvements through the Atwater Village community if the HSR project does not affect existing facilities. Any Atwater Village Community Plan/Los Angeles River Master Plan improvements that interface with the HSR project would be subject to future coordination and formal agreements between the Authority and the City of Los Angeles. [Authority to confirm]

Refer to Section 3.8.4.2 of this Final EIR/EIS for a list of hydrology and water quality IAMFs included as part of the project design, as well as Section 3.8.7 for a list of hydrology and water quality mitigations identified by the Authority for impacts that cannot be avoided or minimized. No revisions to this Final EIR/EIS have been made in response to this comment.

850-1520

The commenter suggests that greenery be planted near proposed project structures in residential areas. The Authority is committed to an aesthetically acceptable design and has incorporated AVQ-MM#4 (Provide Vegetation Screening along At-Grade and Elevated Guideways Adjacent to Residential Areas). This mitigation measure, discussed in Section 3.16.7.1 of the Draft EIR/EIS, provides that the contractor will plant trees along the edges of the HSR rights-of-way in locations adjacent to residential areas to visually screen the elevated guideway and the residential area. In areas where the HSR Build Alternative is not adjacent to the residential areas of Atwater Village, AVQ-MM#4 would not be required since, as stated in Section 3.16.6.3, the HSR Build Alternative would introduce a moderate-low visual change in the area due to the industrial land uses separating Atwater Village from the railroad. No revisions have been made to this Final EIR/EIS in response to this comment.

850-1521

The commenter is requesting a mitigation measure directed towards operational noise impacts associated with HSR infrastructure such as switching stations. N&V-MM#6, described in Section 3.4.7 of the Draft EIR/EIS, sets forth specific approaches to reduce or offset severe noise impacts from HSR operations, including in some cases for sound insulation as the commenter suggests. Although specific projections for operational noise associated with the high-speed train alignment are included in Section 3.4.6 of the EIR/EIS, there are no specific projections for noise associated with infrastructure such as switching stations. However, any specific impact from switching stations and other mechanical equipment will be assessed to ensure compliance with the required criteria in N&V-MM#3 and, if applicable, mitigation will be applied. No changes have been made to this Final EIR/EIS in response to this comment.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1522

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

The comment suggests upgrades to Chevy Chase Recreation Center to offset project impacts. The commenter states that the HSR Project will render it less accessible for many during construction and operations. In other words, the commenter is proposing mitigation in the context of an impact analyzed in Section 3.15 under Impact-PK#2 that is determined to be less than significant for the Chevy Chase Recreation Center.

The HSR Project would not result in direct impacts related to temporary construction easements or permanent displacement or access impacts on the Chevy Chase Recreation Center, as described in Section 3.15. Additionally, as described in Section 3.12.6, Impact SOCIO#7, IAMFs would be incorporated as part of the HSR Build Alternative design to help avoid and minimize impacts. LU-IAMF#3 would ensure that construction and staging areas used temporarily during construction would be returned to a condition equal to the pre-construction staging condition. The HSR Build Alternative's temporary impacts related to noise would be minimized through compliance with NV-IAMF#1, which requires documentation of how federal guidelines for minimizing noise and vibration would be employed near sensitive receptors. The HSR Build Alternative's temporary impacts related to air quality would be minimized through compliance with AQ-IAMF#1, which requires the preparation of a fugitive dust control plan identifying the features that, at a minimum, would be implemented during ground-disturbing activities, and AQ-IAMF#2, which requires the use of low-volatile organic compound paint during construction.

Implementation of TR-IAMF#2, which requires the preparation of a construction transportation plan, would minimize access disruptions on 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. Implementation of these IAMFs would fully minimize the potential for temporary construction impacts to disrupt community facilities, and no mitigation would be required to address the potential for construction of the HSR Build Alternative to temporarily disrupt community facilities. With the implementation of these IAMFs during construction, the impact under CEQA would be less than significant. Therefore, CEQA does not require any mitigation.

850-1522

The comment also states that access to the Chevy Chase Recreation Center would be affected during operations. While the proposed Goodwin Avenue/Chevy Chase Drive Grade Separation Early Action Project would result in the closure of Chevy Chase Drive on either side of the rail alignment, a new pedestrian overcrossing would be provided, maintaining pedestrian and bicycle access to the park from Chevy Chase Drive. In addition, the new grade separation at Goodwin Avenue, located a quarter-mile north, would continue to provide vehicular access to Chevy Chase Park. The new roadway connection would provide an undercrossing from the intersection of Pacific Avenue/San Fernando Road on the east and the residential neighborhood on the west. On the west side of the alignment, the extended roadway would connect with the at-grade intersection of Brunswick Avenue/Goodwin Avenue. As described in the Transportation Technical Report (TTR, Authority) neither intersection #1011 (Brunswick Ave and Goodwin Ave) nor #1012 (San Fernando Rd and Pacific Ave) would operate at unsatisfactory LOS (LOS E or F) in the 2029 Opening Year or 2040 Horizon Year Plus Project conditions. Access to Chevy Chase Park would not be affected with the closure of the Chevy Chase Drive at-grade crossing with the provision of the pedestrian overcrossing.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1523

The commenter expresses concern regarding public safety during construction and the cumulative impacts of rail and river projects in the area. Refer to Response to Comment 850-1530 for information on the Metro Doran Street and Broadway/Brazil Grade Separation Project.

The commenter suggests a specific mitigation measure of a "First Responders substation" to provide safety and emergency services. This suggestion is directed towards the impact on emergency vehicle response times created by project construction, which Section 3.11 of the Draft EIR/EIS determined to be a less than significant impact under CEQA.

As a general matter, as discussed in Section 3.11.4.2, impact avoidance and minimization features (IAMF) are incorporated as part of the High-Speed Rail (HSR) Build Alternative design to help avoid and minimize impacts related to construction-related detours, including distractions, pedestrian and vehicle conflicts, and congestion. SS-IAMF#1 requires that the contractor develop a detailed Construction Safety Transportation Management Plan that would require coordination with local jurisdictions on emergency vehicle access. This plan will also include a traffic control plan that establishes procedures for temporary road closures, including access to residences and businesses during construction, lane closures, signage and flag persons, temporary detour provisions, alternative bus and delivery routes, emergency vehicle access, and alternative access locations. Additionally, TR-IAMF#4 and TR-IAMF#5 require the contractor to prepare specific construction management plans to address the maintenance of pedestrian and bicycle access during the construction period where feasible (i.e., meeting design, safety, and Americans with Disabilities Act requirements). If sidewalks are maintained along the HSR project construction site frontage, there would be covered walkways and fencing.

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

850-1524

The commenter requests that the Authority create a long-term maintenance plan along the rail corridor to prevent dumping and to realize benefits through beautification and ongoing maintenance along the corridor, overpasses, underpasses, and closed streets. The Authority will enter into maintenance agreements with the agencies with jurisdiction over any right-of-way acquired as part of the HSR project. Beautification efforts as part of the HSR Build Alternative are described in Measures AVQ-MM#3 through AVQ-MM#7. No further mitigation measures are necessary and no revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1525

The comment states that the visual landscape would be substantially altered by the proposed project and suggests that overhead utilities that are impacted by the project be relocated underground to mitigate visual impacts. As discussed in Section 3.6, Public Utilities and Energy, of this Final EIR/EIS, the RSA for public utility and energy systems contains both overhead and underground utility infrastructure. The HSR Build Alternative would conflict with existing utilities and require the protection or relocation of some of these utilities. Where the HSR Build Alternative would conflict with existing underground utilities, the Authority would protect these utilities in place or relocate them to a suitable underground location. Where overhead utilities would conflict with the HSR Build Alternative, the utility owner may determine that the overhead utilities should be relocated underground and placed in a conduit. However, final plans for the relocation of utility infrastructure will be prepared in coordination with respective providers during final design. During final design, utility plans would be completed and the Authority will work with utility providers that own impacted facilities within the RSA to determine the most suitable plan for relocation of utility infrastructure. Section 3.16, Aesthetics and Visual Quality, in this Final EIR/EIS addresses the visual landscape during the construction and operation of the HSR Project. AVQ-MM#3, Incorporate Design Aesthetic Preferences into Final Design and Construction of Non-Station Structures, and AVQ-MM#6, Screen Traction Power Distribution Stations and Radio Communication Towers, would reduce impacts to the visual landscape related to the implementation of supports and electrical lines necessary for HSR Project construction and operation. For additional details on mitigation incorporated as part of the HSR Project to minimize impacts to the visual landscape, refer to Section 3.16, Aesthetics and Visual Quality, specifically Section 3.16.6, Environmental Consequences, and Section 3.16.7, Mitigation Measures. No revisions to the Final EIR/EIS have been made in response to this comment.

850-1526

The commenter states that HSR project construction could affect water quality within the Los Angeles River, vibration from passing trains could negatively affect fish, and the Authority should collaborate with the U.S. Army Corps of Engineers (USACE) to clean out the river and maintain the riverbed. The comment does not dispute any impact conclusions made in the Draft EIR/EIS or dispute the effectiveness of mitigation measures included in the Draft EIR/EIS that cover impacts on water quality and sensitive species. The Authority acknowledges these concerns and refers the commenter to Sections 3.7.6.3 and 3.8.6.3 of this Final EIR/EIS for specific analyses related to direct and indirect impacts on sensitive species and water quality, respectively, along with measures included to avoid, reduce, minimize, and compensate for such impacts. The Authority has worked with USACE as a federal cooperating agency for the HSR project and will continue to do so during project design, construction, and operation. Long-term maintenance and clean out of the Los Angeles River will continue to be the responsibility of the USACE and/or the Los Angeles County Flood Control District, depending on the precise location. No revisions to this Final EIR/EIS have been made in response to this comment.

850-1527

The commenter requests that recycled water be extended to the sidewalks so trees could be irrigated after they are planted. As stated in Section 3.16.7.1 of this EIR/EIS, Measure AVQ-MM#1 requires that vegetation removed during construction would be replaced at a 1:1 or 2:1 ratio, depending on the maturity of the tree. Additionally, mitigation measure AVQ-MM#4 requires the provision of vegetation screening along at-grade and elevated guideways adjacent to residential areas and measure AVQ-MM#6 requires the screening of traction power distribution stations and radio communication towers. The details of these design features will be defined further as the design progresses to a 30% level as well as final phases of engineering design. The commenter also mentions trees as a way to mitigate for noise impacts; however, trees do not mitigate noise impacts, as they do not block sounds.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1528

The commenter suggests that the proposed project include a commitment to “public art” to reduce the chance of graffiti on the HSR structures. As discussed in Section 3.16.4.2, the Authority is committed to balancing a consistent, project-wide aesthetic with the local context for the HSR non-station structures (AVQ-IAMF#1, Aesthetic Options). Further, AVQ-MM#7 provides for sound barrier treatments that include designs to deter graffiti and materials that are easily maintained for graffiti removal, as discussed in Section 3.16.7.1. Therefore, the Draft EIR/EIS already includes IAMFs and mitigation measures to address the potential placement of for and deter graffiti on HSR Project structures.

In addition, tThe Authority will work with affected communities to develop aesthetic treatments for HSR Project structures consistent with Technical Memorandum 200.6, Aesthetic Guidelines for Non- Station Structures.

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

850-1529

The commenter requests ongoing maintenance as necessary (tree watering, etc.) for the items listed in comments 1514 through 1528. The Authority will enter into maintenance agreements with the agencies with jurisdiction over any right-of-way acquired as part of the HSR project. Mitigation Measure AVQ-MM#6 (Section 3.16.7.1 of this Final EIR/EIS) requires that landscaping be continuously maintained and appropriate irrigation systems be installed within the landscaped areas. Therefore, the measures included in the Final EIR/EIS address the request made in this comment and no revisions to this Final EIR/EIS have been made in response to this comment.

850-1530

The commenter states that by assuming the Sperry/Salem Overpass and the Verdugo Wash Overpass will be built prior to the HSR Project, the Atwater Village community is subject to impacts that require mitigation. The Sperry/Salem Overpass and the Verdugo Wash Overpass are part of the Doran Street and Broadway/Brazil Grade Separation Project. The Los Angeles County Metropolitan Transportation Authority (Metro) is the CEQA lead agency for the Doran Street and Broadway/Brazil Grade Separation Project, a grade separation for two at-grade rail crossings in Atwater Village and Glendale. Metro, as the CEQA lead agency, filed a Notice of Exemption for this project in December 2018, and, as an exempt project under CEQA, Metro did not adopt any mitigation measures. The Metro project will ultimately improve safety and mobility, thereby enhancing the quality of life for the affected communities. As identified in this Final EIR/EIS, the Authority has evaluated and mitigated for the environmental and community impacts associated with the HSR Project. For detailed discussion, refer to Responses to Comments 793-1419 through 793-1428, contained in Chapter 26 of this Final EIR/EIS.

The Doran Street Grade Separation Project is listed in Table 2-8 in Section 2.5.1.6 of this Final EIR/EIS. The Doran Street project is part of the list of programmed conventional passenger rail improvements included in the California Department of Transportation (Caltrans) Final 2013 California State Rail Plan (Caltrans 2013), the 2016 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016), and the Caltrans Final 2018 California State Rail Plan (Caltrans 2018). As noted in footnote 2 in Table 2-10 of the Draft EIR/EIS and this Final EIR/EIS “Salem Street/Sperry Street would be grade-separated as a part of the Metro Doran Street and Broadway/Brazil Grade Separation Project....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”. Therefore, the Doran Street project is considered to be part of the No Project Alternative in the Draft EIR/EIS and this Final EIR/EIS.

The commenter also states that the Doran Street and Broadway/Brazil Grade Separation Project is not analyzed in Section 3.19, Cumulative Impacts, of the Draft EIR/EIS. Because the Doran Street and Broadway/Brazil Grade Separation Project is considered part of the existing conditions in the No Project Alternative, it has been

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1530

considered in the cumulative impact analysis. Refer to Section 3.19.3, Methods for Evaluating Impacts, which states that the evaluation of cumulative impacts considers the impacts of past, present, and reasonably foreseeable projects. The project has been added to Figure 3.19-1 and Table 3.19-2 in Section 3.19, Cumulative Impacts, for clarity.

The Doran Street and Broadway/Brazil Grade Separation Project has also been added to the Cumulative Project List in Appendix 3.19-A of the Final EIR/EIS.

The commenter states that the HSR and Metro projects would divide the community. As described in Section 3.12.6, Impact SOCIO#15, of this Final EIR/EIS, because the HSR alignment would be located within the existing railroad corridor, it would not create a new barrier for pedestrians or cyclists. Barriers to entering the right-of-way exist at all of the current at-grade crossings except at Main Street and the private Los Angeles Department of Water and Power road. Implementation of the HSR Project and the early action projects would improve the existing environment for motorist, pedestrian, and bicyclist safety in several ways, including by removing train and automobile/bicycle/pedestrian conflicts at the existing at-grade intersections and implementing roadway improvements near the stations and along the HSR alignment.

The commenter also states that the introduction of the overhead catenary lines would permanently change the view in Atwater Village. Section 3.16.6.3 of the Draft EIR/EIS considered three key viewpoints (KVP) in Atwater Village: KVPs 13, 14, and 15. KVP 13 represents views for motorists using Glendale Boulevard. The visual simulation for KVP 13 (Figure 3.16-16) shows the addition of fencing and the overhead catenary lines for the HSR Build Alternative. As discussed in the Draft EIR/EIS, the HSR Build Alternative would be visually compatible with the existing natural and cultural environments and would not interrupt existing views motorists have of Glendale Boulevard. With implementation of AVQ-MM#7, the impacts of the HSR Build Alternative at KVP 13 would be less than significant under CEQA.

KVP 14 represents views for residents and pedestrians using Casitas Avenue. The impacts of the HSR Build Alternative at KVP 14 would be significant because residential groups nearby would experience a high level of exposure to the proposed project; however, with implementation of AVQ-MM#7 (Design a Range of Sound Barrier

850-1530

Treatments for Visually Sensitive Areas) and AVQ-MM#4 (Documentation of Species of Trees Planted Adjacent to Residential Areas), the HSR Build Alternative would be visually compatible with the existing cultural environment. The project's impacts to KVP 14 would be less than significant under CEQA.

KVP 15 represents views for residents or pedestrians using Casitas Avenue. As shown in the visual simulation on Figure 3.16-18, the scale of the HSR Build Alternative would be visually compatible with the surrounding two-story commercial uses that make up the cultural environment. The addition of the proposed project would be visually compatible with the existing rail corridor and project environment. The impacts of the HSR Build Alternative at KVP 15 would be less than significant under CEQA.

Therefore, the introduction of the HSR Build Alternative within the Atwater Village community, including the overhead catenary lines, would be less than significant.

With regard to potential cumulative impacts to Atwater Village, if the planned developments described in Section 3.19 (and Appendix 3.19-A) are all in the cities' planning pipelines, then no single project is likely to preclude another. All the projects listed by the commenter under "Construction Impacts" are accounted for either in Chapter 2, Alternatives (specifically, Tables 2-8 and 2-10) or in Section 3.19, Cumulative Impacts (specifically, the table in Appendix 3.19-A), of the Draft EIR/EIS. The other projects mentioned by the commenter are accounted for in Volume 3 as part of the HSR Preliminary Engineering Design in the Draft EIR/EIS. While it is true that all the projects listed by the commenter are in the vicinity of Atwater Village, the timeline for all the listed projects is unknown. A construction schedule for the Burbank to Los Angeles Project Section is provided in Section 2.9.3 (Table 2-18) of Chapter 2; this schedule spans the years 2020–2029. However, the schedule does not specify the construction duration in the vicinity of Atwater Village. The Authority is committed to overlapping construction of various project elements to the extent feasible. During peak construction periods, work would occur concurrently within different geographic subsections of the proposed HSR alignment. This concurrent work should compress the construction timeline along the rail corridor. The construction schedule is taken into account within each of the resource area discussions of Chapter 3, as well as in Section 3.19, Cumulative Impacts.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1530

Further, the Draft EIR/EIS acknowledges the impacts to communities that may occur during construction. As discussed in 3.19.8.12, construction of the HSR Build Alternative, combined with past, present, and reasonably foreseeable future projects, including the adjacent HSR project sections, would result in temporary cumulative impacts on community character and cohesion because there is no guarantee that construction of the cumulative projects could be conducted in a manner that would sufficiently reduce these impacts. While construction of the HSR Build Alternative would not permanently create a new physical barrier in, divide, or isolate established communities, the extent of construction activities required to build the HSR system would contribute to cumulative impacts on community character and cohesion.

Implementation of mitigation measure CUM-S&C-MM#1 would reduce this impact to a less than significant level and would require coordination with the project sponsors or other entities responsible for construction of the other cumulative projects, including local or regional governments, regarding construction schedules and potential closures, detours, and other elements of construction. Therefore, there is no cumulative socioeconomic and communities impact under CEQA, as discussed in Section 3.19.8.12 of this Final EIR/EIS.

850-1531

The commenter would like the Authority to ensure that the HSR rail corridor does not mimic the Los Angeles River with fences, power lines and lack of connectivity. As shown in Section 3.16.6.3, the existing conditions in the Atwater Village area consist of overhead utilities, fencing, and an existing rail corridor. Features of the HSR Build Alternative such as utilities and fencing are necessary for the operation and safety of the HSR. Refer to Section 2.3.1 for more detail on system design performance, safety, and security. Additionally, as stated in Section 3.16.7.1 of this Final EIR/EIS, AVQ-MM#6 requires the Authority to screen from public view the traction power substations (at approximately 30-mile intervals along the HSR guideway), including radio towers where required, through the use of landscaping or solid walls/fences. This would consist of context-appropriate landscaping of a type and scale that would not draw attention to the station or feature. Overhead catenary lines would be visible in some places but generally would not interrupt existing views. No revisions to this Final EIR/EIS have been made in response to this comment.

850-1532

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

The commenter states that much of Atwater Village is an environmentally burdened census tract and suggests that the HSR Project would subject communities already experiencing environmental injustices to further construction, congestion and isolation. The commenter suggests that significant mitigation or access to the HSR Project itself is required.

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 adverse impacts to low-income and/or minority populations would not occur.

When considering the proposed project with the incorporated 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. Refer to Responses to Comments 850-1530 and 850-1533, contained within this chapter.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1533

The commenter here states that the Doran Street and Broadway/Brazil Grade Separation Project is not analyzed in Section 3.19, Cumulative Impacts, of the Draft EIR/EIS. Refer to Response to Comment 850-1530 for information on Metro's Doran Street project which clarifies that the project was considered in the cumulative impact analysis because it was considered to be part of the existing conditions for the HSR Build Alternative.

850-1534

The comment states that Atwater Village is impacted by multiple projects in addition to the proposed HSR Project and states that the combined impacts of projects from HSR, and Metro, and the Glendale Transit Oriented Communities need to be assessed.

Refer to Response to Comment 850-1533, contained within this chapter.

Section 3.19 of this Final EIR/EIS addresses cumulative impacts of the HSR Project. Section 3.19 presents an analysis of the cumulative effects of implementing the HSR Build Alternative, which, in combination with other past, present, and reasonably foreseeable future projects, may result in cumulative environmental impacts.

Section 3.19.8.17 of this Final EIR/EIS provides a cumulative environmental justice impacts analysis. As discussed, with the proposed design measures, BMPs, offsetting benefits, and mitigation commitments, the Authority has concluded that the HSR Build Alternative would not result in disproportionately high and adverse environmental effects on low-income and minority populations.

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

850-1535

The commenter states that while the HSR team has worked with the community to reduce the acquisition of housing, there has been little effort to improve community connectivity, improve local safe access to public transportation, provide alternative safe transportation options, or safe routes to the bike/pedestrian facilities.

As described in Section 3.12.6, Impact SOCIO #15, of this Final EIR/EIS, because the HSR alignment would be within the existing railroad corridor, it would not create a new barrier for pedestrians or cyclists. Barriers to entering the right-of-way exist at all of the current at-grade crossings except at Main Street and the private Los Angeles Department of Water and Power road. Implementation of the HSR Project and early action projects would improve the existing environment for motorist, pedestrian, and bicyclist safety in several ways, including by removing train and automobile/bicycle/pedestrian conflicts at the existing at-grade intersections and implementing roadway improvements near the stations and along the HSR alignment.

Additionally, the Authority will continue to work to bring benefits to affected communities. Communities adjacent to the HSR Project would experience beneficial effects, such as sales tax gains, growth in regional employment, and improvement to regional transportation, transportation safety, and regional air quality. As discussed in the 2020 Sustainability Report (Authority 2020), approximately 50 percent of the investment in the system in fiscal year 2018–2019 occurred in designated disadvantaged communities throughout California, spurring economic activity in these areas. In support of the priorities listed in the 2020 Sustainability Report, the Authority has programs (i.e., a Community Benefits Policy, a Community Benefits Agreement, a Small and Disadvantaged Business Policy, and a Targeted Worker Program) in place to ensure that low-income and minority populations would benefit from HSR construction.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1536

The comment states that Atwater Village is a community along the HSR alignment already burdened with much of the area's existing and planned infrastructure and that the Draft EIR does not go far enough to acknowledging the impacts to the Atwater Village specifically.

Impacts to the Atwater Village community are included throughout the analysis in this Final EIR/EIS. Impacts to specific communities and cities are described where impacts differ from other communities or cities.

As discussed in Section 3.12.6, Impact SOCIO #2, in Los Angeles, commercial displacements within the Atwater Village and Historic Cultural Neighborhood Council Areas would generally be scattered, would occur adjacent to the existing rail corridor and on the peripheries of established neighborhoods and communities, and would not occur in areas where community gatherings takes place. Therefore, these acquisitions and displacements would not change the existing community character or cohesion.

Additionally, as discussed in Section 3.12.6, Impact SOCIO #15, increased traffic congestion could delay access to neighborhoods and businesses and disrupt communities. However, operation of the HSR Build Alternative would have a minimal effect on traffic. The HSR Build Alternative would be entirely grade-separated, meaning that crossings with roads, railroads, and other transportation facilities would be overcrossings or undercrossings, so that the HSR Build Alternative would neither interrupt nor interface with other modes of transport. As part of the overall California HSR System, the operation of the HSR Build Alternative would also provide permanent beneficial effects through improved regional accessibility, reduced vehicle trips on freeways, and roadway crossings featuring improvements to active transportation infrastructure. The grade-separation projects included as part of the HSR Build Alternative would reduce travel delays by removing the at-grade crossings at the existing railroad tracks. Therefore, changes in traffic from operation of the HSR Build Alternative would not disrupt existing communities.

850-1537

The commenter states that Atwater Village has a strong sense of community in spite of the fact that it is isolated and expresses concern regarding further community division. The commenter notes that along the Los Angeles River, there are currently efforts to connect Atwater Village and that the HSR Project should not continue to divide along the route but address and provide connectivity for Atwater Village residents.

As shown on Figure 3.12-4 in Section 3.12.5.3, the HSR Project would be constructed along the eastern boundaries of Atwater Village along the existing rail corridor. Therefore, the HSR Project would not physically divide the Atwater Village NCA.

Additionally, as discussed above under Response to Comment 850-1536, contained in this chapter, the HSR Build Alternative would be entirely grade-separated, meaning that crossings with roads, railroads, and other transportation facilities would be overcrossings or undercrossings, so that the HSR Build Alternative would neither interrupt nor interface with other modes of transport. These grade separations would create improved connectivity across the existing railroad corridor adjacent to Atwater Village and therefore, the HSR Project would not create an impediment to travel. As part of the overall California HSR System, the operation of the HSR Build Alternative would also provide permanent beneficial effects through improved regional accessibility, reduced vehicle trips on freeways, and roadway crossings featuring improvements to active transportation infrastructure. The grade-separation projects included as part of the HSR Build Alternative would reduce travel delays by removing the at-grade crossings at the existing railroad tracks. Therefore, changes in traffic from operation of the HSR Build Alternative would not disrupt existing communities.

As such, the HSR Project would address and provide connectivity for all communities along the alignment, including Atwater Village residents.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1538

The commenter states that the HSR Project proposes to acquire property from New Life Vision Church. The Authority acknowledges that construction of the New Life Vision Church began in 2016. As discussed in Section 3.1 of this Final EIR/EIS, the existing conditions baseline year for the Draft EIR/EIS is 2015, the time when the environmental analysis for the Burbank to Los Angeles Project Section began following issuance of the federal Notice of Intent and state Notice of Preparation for the project section. Therefore, the church was not included in the existing baseline conditions evaluated in the Draft EIR/EIS. However, based on comments received during the Draft EIR/EIS comment period, the Authority has determined that the switching station could be moved elsewhere within the existing project footprint, thereby avoiding impacts to the church. Refer to Section 2.5.2.5 of this Final EIR/EIS for an updated description of the switching station.

Additionally, refer to [Appendix XX] of this Final EIR/EIS for a description and analysis of design refinements incorporated after public review of the Draft EIR/EIS.

850-1539

The commenter states that the proposed access road off of Verdant Street would violate a Qualified or "Q" Condition unless the access road would be used only for emergency access, rather than for routine access. The proposed access road off of Verdant Street was intended for the Authority's use to access to the proposed HSR systems facility in the area and would not be gated at Verdant Street. However, this systems facility has been relocated to [TBD], and the access road near Verdant Street is no longer needed. Please see sheet TP-04101, contained within Volume 4 of this Final EIR/EIS, which shows the removal of the facility and associated access road.

850-1540

The commenter expresses concern related to the temporary construction easement (TCE) at the Franciscan Metro Center complex and impacts to parking. This is a temporary access easement for project construction, and the area required is only estimated for planning purposes during initial engineering of the alignment. This need for an easement and the duration of the TCE will be verified in more detail during final design which will occur after the certification of the Final EIR/EIS.

The temporary parking loss will not occur for all project phases, and when the related construction phase is complete, parking access will be restored and any potential impacts will be removed.

The particular issue cited by the comment, namely that traffic entering from the street is given right-of-way over traffic circulating in the parking lot, is widespread in California and considered best-practice. The point of this practice is to ensure that if long queues occur that they are in the parking lot of the development rather than impeding flow on the public streets. No mitigation in the form of signalized intersections would be required, and no revisions to this Final EIR/EIS have been made in response to this comment.

850-1541

The commenter states that the proposed HSR Project proposes to acquire four parcels on Casitas Avenue between Glendale Boulevard and Fletcher Drive. The commenter states the description of the displaced land use at 3265 Casitas Avenue is not correct as part of the parcel is occupied by the Atwater Village Theater.

The parcel with the Atwater Village Theater is not proposed to be acquired. However, the properties southeast of the Atwater Village Theater are proposed partial acquisitions. Refer to Appendix 3.12-D, Property Acquisitions and Easements, of this Final EIR/EIS for a detailed map showing expected property acquisitions and easements required. The HSR Project does not propose business displacements on these properties and therefore, the Atwater Village Theater complex is not proposed to be demolished.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1542

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

The commenter states that the temporary construction easement (TCE) on the parking lot on 3265 Casitas Avenue encompasses an entire parking lot that serves the site and states that if the theater is not demolished, it is unclear what the impact would be on the theater.

Although TCEs are shown to cover entire parcels in Appendix 3.12-D, actual easement areas may only be a portion of the property. Any portion of the parcel not included in the TCE would be available for continued use by the property owner.

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

Businesses near construction areas may need to close temporarily to allow for construction laydown areas in cases where access in and out of the facility would be restricted or where buildings would need to be modified to remain adjacent to the proposed project.

Due to the preliminary design evaluated in this Final EIR/EIS, identifying the individual circumstances surrounding potential TCE acquisitions is not possible at this time. In order to be conservative in the analysis, most of the residences and businesses on partially acquired parcels, including those that may ultimately be only temporarily affected, are counted as fully acquired and the land uses on the property displaced. This assumption allows for a preliminary understanding of the worst-case magnitude of potential property impacts. The final full- and partial-parcel acquisition decisions would ultimately be determined on a case-by-case basis during the land acquisition and real estate appraisal phase for the HSR Build Alternative.

Owners who believe they have suffered a loss of property value as a result of the project

850-1542

Owners who believe they have suffered a loss of property value as a result of the project may file a claim with the State of California's Government Claims Program. More information on filing a claim may be obtained online at the following link:
<https://www.dgs.ca.gov/ORIM/Services/Page-Content/Office-of-Risk-and-Insurance-Management-Services-List-Folder/File-a-Government-Claim#@ViewBag.JumpTo>.

850-1543

The commenter expresses concern related to impacts to parking and requests mitigation for loss of parking. The replacement of lost parking as a result of property acquisitions would be addressed as part of the right of way acquisition process as required by SOCIO-IAMF #2, Compliance with the Uniform Relocation Act.

850-1544

The commenter states that the Chevy Chase Drive access is stated as an undercrossing in the Draft EIR/EIS and a bridge in another area and requests that the Final EIR/EIS be corrected to clarify. It is assumed the commenter is referring to a note on drawing number CV-G1128 of Volume 3.4 of this Final EIR/EIS. It is further assumed that this refers to the structure carrying the HSR tracks over the pedestrian underpass, which is also notated on these plans. The design has been updated after coordination with the City of Glendale to provide a pedestrian bridge across Chevy Chase Drive. Section 2.5.2.9 of this Final EIR/EIS has been revised to describe the pedestrian bridge.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1545

The commenter expresses concern related to safety during construction of the HSR project, specifically restriction of access to construction areas by the general public. As stated in SS-IAMF#2: Safety and Security Management Plan (SSMP)—The contractor would prepare a technical memorandum describing how construction-related safety and security measures would be implemented. The SSMP would identify the local conditions and requirements unique to the construction site and work to be performed, and would address security fencing to prohibit unauthorized entry into the construction area.

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

850-1546

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

The comment states that potential impacts to the Chevy Chase Recreation Center and Park are dismissed in Appendix 3.12-C.

The High-Speed Rail (HSR) Project would not result in direct impacts related to or permanent displacement or in access impacts on the Chevy Chase Recreation Center.

The comment also states that access to the Chevy Chase Recreation Center would be affected during operations. While the proposed Goodwin Avenue/Chevy Chase Drive Grade Separation Early Action Project would result in the closure of Chevy Chase Drive on either side of the rail alignment, a new pedestrian bridge would be provided, maintaining pedestrian and bicycle access to the park from Chevy Chase Drive. In the Draft EIR/EIS, the design included a pedestrian undercrossing; however, the design has been updated after coordination with the City of Glendale to provide a pedestrian bridge across Chevy Chase Drive. Section 2.5.2.9 of this Final EIR/EIS has been revised to describe the pedestrian bridge. In addition, the new grade separation at Goodwin Avenue, located a quarter-mile north, would continue to provide vehicular access to Chevy Chase Park. The new roadway connection would provide an undercrossing from the intersection of Pacific Avenue/San Fernando Road on the east and the residential neighborhood on the west. On the west side of the alignment, the extended roadway would connect with the at-grade intersection of Brunswick Avenue/Goodwin Avenue. As described in the Transportation Technical Report (TTR, Authority) neither intersection #1011 (Brunswick Ave and Goodwin Ave) or #1012 (San Fernando Rd and Pacific Ave) would operate at unsatisfactory LOS (LOS E or F) in the both the 2029 Opening Year and 2040 Horizon Year Plus Project conditions. Access to Chevy Chase Park would not be affected with the closure of the Chevy Chase Drive at-grade crossing with the provision of the pedestrian bridge.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1547

The commenter refers to Appendix 3.13-C, Table 3.12-C-5, High-Speed Rail Build Alternative Operation Impacts on Children's Health and Safety, which states that "during operation of the HSR Build Alternative, only minor amounts of hazardous materials would be used, and all laws, regulations, and ordinances would be followed with respect to the transport, use, storage, and disposal of hazardous materials." Table 3.12-C-5 is intended to provide a brief summary of potential impacts and their relevance to children's health and safety after implementation of mitigation measures.

The summary provided in the table is accurate per the description of the site in Section 3.10.6.3, and Table 3.12-C-5 is not the appropriate place to discuss the San Fernando Groundwater Basin Superfund site in detail. This site is discussed in Section 3.10.5.1 of this Final EIR/EIS. Therefore, no revisions were made to Appendix 3.12-C of this Final EIR/EIS in response to this comment.

850-1548

The commenter states that Appendix 3.12-C, page 11, Parks and Recreational Resources omits the Glenhurst Pocket Park in South Atwater.

The commenter is correct about this omission, however the page reference is incorrect. Glenhurst Park has been added to Table 3.12-C-2, Parks, Recreation, and Open Space Resources within 0.5 mile of the High-Speed Rail Build Alternatives in Appendix 3.12-C of this Final EIR/EIS. In addition, Glenhurst Park is discussed in Section 3.15 of the Draft EIR/EIS.

850-1549

The commenter states that Chevy Chase Park is indicated as an Early Childhood Center, but it is also a park.

A park symbol has been added to Chevy Chase Park in Appendix 3.12-A Figure 3.12-1, Community Facilities, of this Final EIR/EIS.

850-1550

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

The commenter requests a discussion of the changes in access to Chevy Chase Park with the closure of the Chevy Chase Drive at-grade crossing and a traffic analysis for people using the park. Refer to Standard Responses BLA-Response-Section 3.2 TRAN-01: Temporary Traffic Impacts. While the proposed Goodwin Avenue/Chevy Chase Drive Grade Separation Early Action Project would result in the closure of Chevy Chase Drive on either side of the rail alignment, a new pedestrian bridge would be provided, maintaining pedestrian and bicycle access to the park from Chevy Chase Drive. In the Draft EIR/EIS, the design included a pedestrian undercrossing; however, the design has been updated after coordination with the City of Glendale to provide a pedestrian bridge across Chevy Chase Drive. Section 2.5.2.9 of this Final EIR/EIS has been revised to describe the pedestrian bridge. In addition, the new grade separation at Goodwin Avenue, located a quarter-mile north, would continue to provide vehicular access to Chevy Chase Park. The new roadway connection would provide an undercrossing from the intersection of Pacific Avenue/San Fernando Road on the east and the residential neighborhood on the west. On the west side of the alignment, the extended roadway would connect with the at-grade intersection of Brunswick Avenue/Goodwin Avenue. As described in the Transportation Technical Report (TTR, Authority) neither intersection #1011 (Brunswick Ave and Goodwin Ave) or #1012 (San Fernando Rd and Pacific Ave) would operate at unsatisfactory LOS (LOS E or F) in the both the 2029 Opening Year and 2040 Horizon Year Plus Project conditions. Section 4.6.1.11 of the Draft EIR/EIS stated that all project improvements and proposed work would be completed outside the resource boundaries and no access impacts would result from the project. Chapter 4 of this Final EIR/EIS has been updated to clarify that access to Chevy Chase Park would not be affected with the closure of the Chevy Chase Drive at-grade crossing with the provision of the pedestrian bridge.

Response to Submission 850 (Courtney Morris, Atwater Village Neighborhood Council, August 25, 2020) - Continued

850-1551

The commenter states that there is no discussion of the increase in frequency of noise at the Chevy Chase Recreation Center (referred to as Chevy Chase Park by the commenter). The frequency of HSR train operations was considered in the analysis of operational noise impacts discussed under Impact N&V #4 in Section 3.4.6 of this Final EIR/EIS. As discussed in Section 4.6.1.11 of the Draft EIR/EIS and this Final EIR/EIS, a moderate impact indicates that the introduction of the HSR Project will be noticeable to most people, but it may not be sufficient to cause strong reactions from the community. Therefore, proximity impacts would not substantially impair the activities, features, or attributes of the Chevy Chase Recreation Center. No revisions have been made to the Final EIR/EIS as a result of this comment.

850-1552

The commenter states that in Appendix C of the Community Impact Assessment, the Chevy Chase Recreation Center is not listed or discussed.

The Chevy Chase Recreation Center has been added to the Community Impact Assessment Appendix C, Table C-1, Analysis of Potential Project Effects on Community Facilities Within the Communities and Populations Indirect Impacts Resource Study Area of the High-Speed Rail Build Alternative.

850-1553

The commenter states that the public review period was not adequate for a complete commentary on the Draft EIR/EIS. In response to agency and stakeholder requests, and in consideration of limitations caused by the novel coronavirus pandemic, the California High-Speed Rail Authority (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 more than twice the minimum requirement of 45 days pursuant to CEQA (Pub. Res. Code Section 21091) and NEPA (40 C.F.R. Section 6203(C)(3)(v)). The Authority will continue to coordinate with local community groups through the remaining environmental review process, final design, construction, and throughout the life of the project.

Submission 675 (Marianne Vogel Bender, Atwater Village Neighborhood Council, Community Greening Committee, July 7, 2020)

Burbank - Los Angeles - RECORD #675 DETAIL

Status : Action Pending
Record Date : 7/7/2020
Submission Date : 7/7/2020
Interest As : Business and/or Organization
First Name : Marianne
Last Name : Vogel Bender
Attachments : High Speed Rail Noise Barriers - Jun 30 2020 - 1-19 PM-2.pdf (673 kb)

Stakeholder Comments/Issues :

****PUBLIC COMMENT****

TO: High Speed Rail Authority (Burbank to LA Section)

FROM: Marianne Bender, Atwater Village Neighborhood Council, Community Greening Committee

RE: Noise Barrier on the Southbound Track from Fernando Ct to Glendale Blvd (NB (Noise Barrier) No 1

675-694

PUBLIC COMMENT: The current HSPA EIS has the NB (Noise Barrier) No 1 only being built South to Glendale Blvd. Being that there are many residential streets South of Glendale Blvd, the residents of South Atwater would like the Rail Authority to consider extending NB (Noise Barrier) No 1 further south to Fletcher Blvd. Thank you.

*Documentation showing NB (Noise Barrier) No 1.

Noise & Vibration
 (Spreadsheet) Volume 1, Section 3.4, Page 50
 (Map) Volume 1, Section 3.4, Page 51

Marianne Vogel Bender
 mariannebender12@gmail.com
 (215) 262-8892 mobile

Table 3.4-21 Noise Barrier Analysis—High-Speed Rail Build Alternative

Barrier	Track	Location	Track Type	Total Length (feet)	Total Height (feet)	Area (square feet)	Total Cost	Beneficial Receivers	Cost per Beneficial Receiver	Cost Exceeds \$95,000?	Is Barrier Reasonable?	5 gBA Reduction?	Identified Severe Impacts	Severe Impacts with Mitigation
1	Southbound Track	Fernando Ct to south of Alameda Glendale Blvd	Alameda	3,200	10	32,000	\$2,240,000	48	\$46,875	No	Yes	Yes	52	25
					12	38,400	\$2,898,000	273	\$9,846	No	Yes	Yes	0	0
					14	44,800	\$3,138,000	273	\$11,487	No	Yes	Yes	0	0
2	Northbound Track	Glendale Blvd to Tylom Ave	Alameda	2,000	10	20,000	\$1,400,000	0	-	-	No	No	19	19
					12	24,000	\$1,680,000	208	\$8,077	No	Yes	Yes	0	0
					14	28,000	\$1,960,000	208	\$9,423	No	Yes	Yes	0	0
3	Southbound Track	Avila Ct to 5 Overpass	Alameda	4,900	10	49,000	\$3,430,000	0	-	-	No	No	11	4
					12	58,800	\$4,116,000	211	\$19,507	No	Yes	Yes	0	0
					14	68,600	\$4,902,000	211	\$22,758	No	Yes	Yes	0	0

May 2020
 Page | 3.4-50

California High-Speed Rail Project Environmental Document
 Report to Los Angeles Project Section Draft EIR/EIS

Submission 675 (Marianne Vogel Bender, Atwater Village Neighborhood Council, Community Greening Committee, July 7, 2020) - Continued

Section 3.4 Noise and Vibration

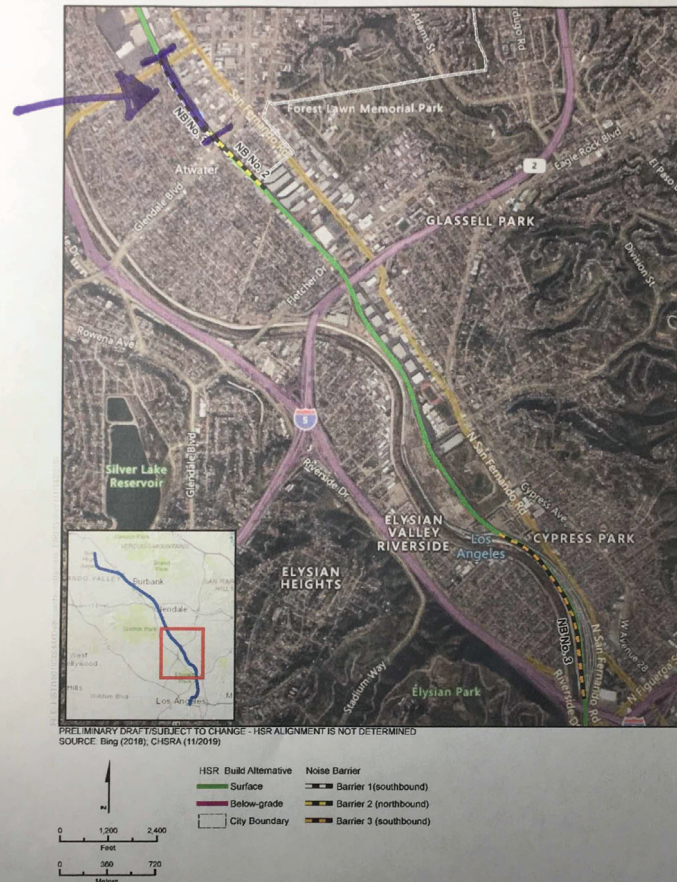


Figure 3.4-10 Sound Barrier Locations

Response to Submission 675 (Marianne Vogel Bender, Atwater Village Neighborhood Council, Community Greening Committee, July 7, 2020)

675-694

As the commenter notes, as shown on Figure 3.4-10 of this Final EIR/EIS, the proposed NB No. 1 along the southbound side of the HSR tracks extends from Fernando Court to south of Glendale Boulevard. While there are residential uses farther south of Glendale Boulevard, the noise impact analysis determined that none of the impacts to those residences would be classified as severe. Therefore, consistent with the Authority's Noise Mitigation Guidelines (Appendix 3.4-A), the barrier was placed in a location to protect receptors that are expected to be severely impacted. No changes have been made to the Final EIR/EIS in response to this comment.

Submission 683 (Ronald Lozano, Boys & Girls Club, July 8, 2020)

Burbank - Los Angeles - RECORD #683 DETAIL

Status : Unread
Record Date : 7/9/2020
Submission Date : 7/8/2020
Interest As : Business and/or Organization
First Name : Ronald
Last Name : Lozano
Attachments : [683]_[Lozano]_Helpline_[07820]_Original.pdf (1 kb)

Stakeholder Comments/Issues :

Yes, my name is Ronald Lozano. I'm with the Boys and Girls Club in Lincoln Heights and uh my spelling is R-O-N-A-L-D L-O-Z-A-N-O. And I have a comment regarding the alignment or the route of the High-Speed Rail at Main St. Wondering if it is going to cause delays at Main St why wasn't there a grade separation proposed? And if there was a grade separation because of the radius on one side of the street versus something you know something like that you could have purchased or did an eminent domain if that is taken into consideration but I mean raising the street up so I'm leaving the tracks where they're at and but I went through the enviros and I couldn't I couldn't frankly I couldn't take it any more. So I'll just spend more time on going through it but trying to come up to with where the acquisitions are gonna be in Lincoln Heights. Actually the 12 houses residential houses are gonna be in Lincoln Heights and if you could extend it some somehow I mean give us an allowance for this safer at home shut down that would be appreciated. Maybe sometime into August. Thank you very much and my number is area code 626-616-1317 thanks.

683-704

683-705

683-706

Burbank - Los Angeles - RECORD #683 DETAIL

Status : Unread
Record Date : 7/9/2020
Submission Date : 7/9/2020
Interest As : Business and/or Organization
First Name : Ronald
Last Name : Lozano

Stakeholder Comments/Issues :

Yes, my name is Ronald Lozano. I'm with the Boys and Girls Club in Lincoln Heights and uh my spelling is R-O-N-A-L-D L-O-Z-A-N-O. And I have a comment regarding the alignment or the route of the High-Speed Rail at Main St. Wondering if it is going to cause delays at Main St why wasn't there a grade separation proposed? And if there was a grade separation because of the radius on one side of the street versus something you know something like that you could have purchased or did an eminent domain if that is taken into consideration but I mean raising the street up so I'm leaving the tracks where they're at and but I went through the enviros and I couldn't I couldn't frankly I couldn't take it any more. So I'll just spend more time on going through it but trying to come up to with where the acquisitions are gonna be in Lincoln Heights. Actually the 12 houses residential houses are gonna be in Lincoln Heights and if you could extend it some somehow I mean give us an allowance for this safer at home shut down that would be appreciated. Maybe sometime into August. Thank you very much and my number is area code 626-616-1317 thanks.

Response to Submission 683 (Ronald Lozano, Boys & Girls Club, July 8, 2020)

683-704

The commenter asks if the HSR Build Alternative will cause delays at Main Street and why there is not a grade separation proposed for the area. As stated in Section 2.5.2.9 of this Final EIR/EIS, the HSR Build Alternative includes the Main Street bridge element, which would provide a grade separation of the Los Angeles River railroad crossing points on Main Street. Improvements to Main Street would remove traffic delays caused when the gates are down at the existing at-grade railroad crossing when trains pass by.

683-705

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

The commenter is unsure if a grade separation is proposed for Main Street, and if one is proposed, the commenter would like to understand what property acquisition or eminent domain would be required to construct the Main Street Grade Separation.

Main Street is an existing at-grade crossing. The HSR Build Alternative proposes a grade separation. A new Main Street bridge would be constructed that would span the tracks on the west bank, the Los Angeles River, and the tracks on the east bank. Please see the standard response in this chapter that discusses the impacts related to the Main Street Grade Separation.

The HSR project also would require property acquisitions to construct the Main Street Grade Separation. These property acquisitions, including full acquisitions, partial acquisitions, and temporary construction easements, are shown in Appendix 3.12-D, Property Acquisitions and Easements. Please see the standard response in this chapter that discusses relocation, the right of way acquisition process, and eminent domain.

683-706

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

Submission 698 (Marva Murphy, Burbank Advisory Council on Disabilities (BACOD), July 22, 2020)

Burbank - Los Angeles - RECORD #698 DETAIL

Status : Action Pending
Record Date : 7/22/2020
Submission Date : 7/22/2020
Interest As : Business and/or Organization
First Name : Marva
Last Name : Murphy

Stakeholder Comments/Issues :

body{font-size:10pt;font-family:arial,sans-serif;background-color:#ffffff;color:black;}p{margin:0px;}Good Day:
Please pass along this email to the department/individual responsible for insuring the proposed High Speed Rail station at Burbank Airport is in compliance with ADA guidelines?
I represent the Burbank Advisory Council on Disabilities (BACOD) and it has come to our attention that often, newly built train/bus stations in our area, are built to ADA guidelines, which are sorely outdated. Due to technology, the face of electric equipment, cell phone accessible programs etc., not included in existing ADA guidelines, are being used to improve the quality of life for those with functional needs. Members on our Council represent individuals with a variety of physical challenges, who are accustomed to doing an onsite inspection and/or reviewing architectural plans to insure compliance receives an updated reality check.
We hold monthly meetings (Zoom - as a result of COVID19) and would greatly appreciate a presentation/question and answer period from a staff person familiar with ALL THINGS Burbank Airport Station. We meet on the 4th Thursday of the month at 1:00 pm.
Please contact me to schedule a visit/presentation for an upcoming BACOD Zoom meeting.
Thank you,MM

698-786

Response to Submission 698 (Marva Murphy, Burbank Advisory Council on Disabilities (BACOD), July 22, 2020)

698-786

The commenter requests assurance that the Burbank Airport Station will comply with Americans with Disabilities Act guidelines. As stated in Section 2.3.3 of this Final EIR/EIS, all stations would be designed in accordance with Americans with Disabilities Act accessibility guidelines. Additional technologies may be identified in later stages of station planning and design.

In response to this comment, the Authority also met with the Burbank Advisory Council on Disabilities on Thursday, August 27, 2020 and provided an overview of the station planning efforts, including what the Authority is planning to ensure accessibility throughout station facilities, parking, and while riding the train. Points of discussion at that meeting also included accessible entrances, paths of travel, Americans with Disabilities Act-compliant parking, drinking fountains and other facilities, and accessible restrooms. The Authority explained the process for environmental clearance, design, and construction and committed to keeping the Burbank Advisory Council on Disabilities informed and involved in the process.

Submission 640 (Bronwen Keiner, Burbank Transportation Management Organization, June 16, 2020)

Burbank - Los Angeles - RECORD #640 DETAIL

Status : Action Pending
Record Date : 6/16/2020
Submission Date : 6/16/2020
Interest As : Business and/or Organization
First Name : Bronwen
Last Name : Keiner
Stakeholder Comments/Issues :
 Hi There,

640-716

We'd like to advertise the upcoming Public Hearing in July in our newsletters over the next couple weeks.

Would it be possible for you to send us a flyer for that meeting like the one below?

[cid:image001.jpg@01D643EB.53CA9810]

Thanks!
~Bronwen

Bronwen Trice Keiner
 Director
 [BTMO_black]
 Burbank Transportation Management Organization
 200 W. Magnolia Blvd.
 Burbank, CA 91502
 direct line: 213-425-0966
 office line: 818-736-5230
www.btmo.org

From: Burbank Chamber pf Commerce <bbj@burbankchamber.org>
 Sent: Tuesday, June 16, 2020 12:32 PM
 To: Bronwen Keiner <bronwen@btmo.org>
 Subject: Burbank Business Journal May-June 2020

[Signature]
[\[http://www.cbfs-net.com/HTML/Email/Images/bbj-mayjune-2020-banner.png\]](http://www.cbfs-net.com/HTML/Email/Images/bbj-mayjune-2020-banner.png)
 Dear Bronwen,

A MESSAGE FROM THE CHAIRMAN OF THE BOARD

You will notice the upbeat tone of the video I did more than a couple of weeks ago for the Burbank Business Journal. This was before we knew of Mr. Floyd's senseless and violent death.

At the Burbank Chamber we strive to create an environment that is welcoming, supportive and inclusive to all.

We are grateful to our Burbank Community for their peaceful protests as it was an unnerving time for many. We also know it was important to bring a spotlight to the injustices in our society. We are thankful for our Burbank Police and Fire departments for their courage and commitment to the citizens of our city.

We support all of the Black owned businesses in Burbank and will do everything we can to help promote them. I have listed a few that we have had a relationship with but would like to connect with others we may not know about. Please, if you know of others, email us at info@burbankchamber.org.

- Tansy- Florist
- Effleurage Studio- Facial and Waxing
- Lou, The French On The Block
- Gus's Fried Chicken
- My Other Office

For the past 100 years the Burbank Chamber of Commerce has continued to support our businesses and be a conduit in building a strong community. Our mission is to continue to do so.

Thank you,

Karen Volpei-Gussow
 Chairman of the Board
 Burbank Chamber of Commerce

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 CHAT WITH THE SUPERVISOR
[\[http://www.cbfs-net.com/HTML/Email/Images/barger-webcall-6-15-20.png\]](http://www.cbfs-net.com/HTML/Email/Images/barger-webcall-6-15-20.png)
 THANK YOU Supervisor Kathryn Barger
 Chairman of the LA County Supervisors

We appreciate you sharing your time, expertise and support for our Chamber members and the business community.

Submission 640 (Bronwen Keiner, Burbank Transportation Management Organization, June 16, 2020) - Continued

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2FQ3omkfK7wOdDh3hVyMzkbNs6NzhkdONJZudpfmamD-2F0wN8aBdFqqCYdPsG1JFCluvjLFPz8-3D>. To download or use the 2019-2020 Guide to Burbank. Click Here<https://u887902.ct.sendgrid.net/ls/click?upn=dhG1ukg57iHFueYiEDLXOkQM4mIANK3K6CQOY1ky5qvprSFqKDORFXN-2BNDmSvjCTP6px-2B3aj6cVtyoLWO59BePteZqFj6JtOMA-2Fhn-2FpSmnrVA4EoADJHVhWrLzxfG8huw3FaQUP8h6xSXFNHYB3-2B1PEIm4YYzHEsVhODSQyrU8F6KbDAFMq-2FireJznd1AwzMZ_INeMxsnw0iDjA8k5tDaRmqOCaK2wA3t7syBrDgOMz5k-2FzmTXyFWP3EdQBBhQLuDVQWNgg2GA4HZFDXtD7JaDui-2BR-2Bflu7bkeggKcFcxwsUSi3VjyrQXo2UyEvAiNrSjQ1vgt1-2FhSuC0HrVl8iGuox4fDXvJmJPs0uJ0iFjj4W6Cy4QD1ZRsdHEZz8dK4VhyjSEICIEa4GF7Vn0NtzR4q5Q5JINhJ6O1x3aHbbz9c-3D>. Contributions to the Burbank Chamber of Commerce are not deductible as charitable contributions for income tax purposes, but may be deducted as ordinary and necessary business expenses.

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Response to Submission 640 (Bronwen Keiner, Burbank Transportation Management Organization, June 16, 2020)

640-716

The commenter requested a flyer for a public meeting. The commenter was contacted on June 26, 2020 and the requested flyer was sent to her.

Submission 799 (Bronwen Keiner, Burbank Transportation Management Organization, August 10, 2020)


Burbank - Los Angeles - RECORD #799 DETAIL

Status : Unread
Record Date : 8/10/2020
Submission Date : 8/10/2020
Interest As : Business and/or Organization
First Name : Bronwen
Last Name : Keiner

Stakeholder Comments/Issues :

Hello!

799-1437

Is it possible for you to share the flyer below about the comment period extension?

Bronwen Trice Keiner
Director
[BTMO_black]
Burbank Transportation Management Organization
200 W. Magnolia Blvd.
Burbank, CA 91502
direct line: 213-425-0966
office line: 818-736-5230
www.btmo.org

From: California High-Speed Rail Authority <burbank_los.angeles@hsr.ca.gov>
Sent: Friday, June 26, 2020 3:31 PM
To: Bronwen Keiner <bronwen@btmo.org>
Subject: Thank You for Your Inquiry Regarding the Burbank to Los Angeles Project Section

Dear Ms. Keiner,

Thank you for your interest and support of the California High-Speed Rail Burbank to Los Angeles Project Section.

The flyer for upcoming public hearings is available here:
<https://drive.google.com/file/d/1oPsmkI5hMBv3YVsdSVpUkODrijD7rc29/view>

You may download, print and share.

Please let us know if you have any further questions.

Sincerely,

The Burbank to Los Angeles Project Team

California High-Speed Rail Authority
Burbank_los.angeles@hsr.ca.gov

(800) 977-1660

Burbank to Los Angeles Project Team
California High-Speed Rail Authority
burbank_los.angeles@hsr.ca.gov

Response to Submission 799 (Bronwen Keiner, Burbank Transportation Management Organization, August 10, 2020)

799-1437

The commenter requested a flyer for the comment period extension. The requested flyer was sent to the commenter on August 10, 2020.

Submission 846 (Juanita Myers, Central Atwater Residents, August 6, 2020)

To: California High Speed Rail Authority
 From: Juanita Myers (on behalf of central Atwater Village residents)
 Date: 8/06/20
 Re: The central Atwater Village section of the HSR project: specifically Seneca Ave between Los Feliz and Glendale Blvds, City of Los Angeles 90039

On 7/27/20 Chelsea and Tyler (of the HSR Authority) and I Zoom-conferenced for an hour to go through some questions I had after reviewing Volumes I-III of the Draft EIR/EIS. Some of the key points and issues raised/discussed in that meeting are as follows.

Noise concerns:

846-1500 | The storage facility, with 3 rows of large warehouses 20+ feet tall, parallels the existing Metrolink tracks for the whole stretch of Seneca Ave and serves as a substantial noise buffer to current existing train-related noise. Tearing down these structures (Volume I section 3.16, page 3.16-72) and then bringing additional and more frequent train noise into the area is a huge concern for our neighborhood which abuts this property.

846-1501 | In addition, Volume I section 3.19, page 3.19-34 (Operation/Noise, paragraph 2) states: "...a benefit of the HSR build Alternative is the elimination of freight train horns being sounded throughout the HSR corridor because of the replacement of existing at-grade crossings with grade separations." This, however, is not true for central Atwater. The Glendale station is, and will continue to be (as plans exist currently) at-grade, and therefore all horn-honking would remain.

846-1502 | Thus, with the dramatic increase in traffic and noise the HSR will bring, the loss of existing and substantial noise buffers, and zero reduction in loud horns, we as a community will require serious noise mitigation measures. We expect the Authority to earnestly engage in a design and review process with the community, before any construction begins, as required by AVQ-AIMF-s #1 and #2, Volume II, Appendix 2-B, page 2-B-3.

Aesthetics:

846-1504 | It was vastly disappointing to find Key Viewpoint 12 (Volume I section 3.16, pages 3.16-72&73) for central Atwater to be shown from the perspective of the Glendale station and its passengers. Passengers pass on through. Residents are the ones spending vast amounts of their time and lives in the vicinity and those who will most be affected by changes in their immediate surroundings.

Simulated views from the public street of Seneca Ave where residents and non-residents alike drive through should have been included here. As the storage property abuts residents all along Seneca, the property's aesthetics is an extremely sensitive issue, and a very important one to address with full disclosure.

Non HSR use of the storage property (ie, the "remainder"):

846-1505 | Volume I section 3.16, page 3.16-72 states "the existing storage units behind the HSR track/train would be removed."

Keeping at least some of the storage facility intact would be our ideal outcome for the following reasons: sound buffering, low noise impact to neighbors during business hours and silent after closing at 7:00pm every day, caretakers on property with security cameras and monitoring 24/7, structures are 20 feet in height and barely visible from the street, protecting the view-shed of the mountains etc., lighting at night is soft and minimal and barely exceeds building height.

Residents urge the Authority to reconsider the possibility of keeping some of the storage facility intact - if the owner of the property is willing.

846-1506 | Should negotiations (if any) toward this effort fail and/or operational requirements for the HSR call for total demolition, we respectfully insist the Authority earnestly engage with our community in discussions and/or workgroups towards deciding on alternatives for the remainder of this property, before any construction/demolition starts. Two alternatives our neighborhood will absolutely reject are as follows.

1. Unacceptable to central Atwater residents anywhere on this property would be a cell tower of any kind.

Background: In early 2017 our neighborhood fought and won against an application for a Verizon cell tower to be installed in the storage property. We gathered almost 1,700 signatures in opposition from citizens and business owners in the area and received the unanimous support of the Atwater Village Neighborhood Council. Basically, *no one* here wants a cell tower located anywhere on this property.

Verizon has since opted to co-locate on the pre-existing AT&T tower located on Casitas Ave, on the south side of Glendale Blvd. (Co-locating = multiple wireless companies sharing the same tower.) In addition, a developer has since constructed a 2-story housing complex on the remainder of the small parcel. Both structures abut the existing Metrolink tracks and will most likely need to be removed. Should it in fact happen that the HSR would need to move this tower, we as a community demand that it remain on that same parcel of land, as close as possible to where it stands now, or, at the very least, not be relocated to anywhere on the storage property.

2. Also unacceptable to central Atwater residents anywhere on this property would be the development of commercial and/or residential buildings.

We are already adversely impacted by traffic flowing through our streets from businesses on both Los Feliz and Glendale Blvds. Any such development would increase noise, traffic and most certainly impair our privacy, destroy views and completely alter the character of our neighborhood.

Misc:

846-1508 | Volume I section 3.5, page 3.5-10 shows plans for a radio transmitter site located near the Glendale train station in central Atwater. We strongly request the Authority find an alternative location for this transmitter, along with any other "extraneous" structures, that could be located elsewhere to non-residential areas.

846-1509 | As property owners and residents in a "severe impact" HSR-designated zone, we will be living with the consequences of this serious and permanent change to our immediate surroundings long after the HSR construction has come and gone. The concerns listed above will have grave implications for our property values and the peaceful enjoyment of our homes depending on how they are handled, and as such, our viewpoints and input should take precedent.

Thank you for your attention on behalf of central Atwater residents,



Juanita Myers
 3744 Seneca Ave., Los Angeles, CA 90039
 323-663-0844

Response to Submission 846 (Juanita Myers, Central Atwater Residents, August 6, 2020)

846-1500

While the removal of the existing warehouses has the potential to increase noise levels to the homes along Seneca Avenue as noted in this comment, there would be a reduction of noise due to the removal of loading and unloading activities that occur at the storage facilities. Furthermore, as part of the HSR project, a sound barrier in the vicinity of the residences along Seneca Avenue between Los Feliz Boulevard and Glendale Boulevard is proposed, which would reduce noise from all rail activities. No changes have been made to the Final EIR/EIS in response to this comment.

846-1501

The commenter notes that train horns would still be sounded at the Glendale Station. The Authority acknowledges this and has modified the text in Section 3.19.8.4 to state that “an operational benefit of the HSR Build Alternative would be the elimination of freight train horns being sounded where grade separations would replace at-grade crossings within the existing rail corridor.” In general, this would lower noise levels experienced by those receptors near existing at-grade crossings.

846-1502

In relation to noise level increases associated with the HSR project, daily train operations have been appropriately identified as severe. There are no expected significant noise increases related to increases in vehicular traffic. Lastly, it is expected that there will be reduction in horn noise due to the closure of the at-grade crossing at Chevy Chase Boulevard and the new grade separated crossing at Goodwin Avenue. This Final EIR/EIS has recommended a sound barrier in the vicinity of the residences along Seneca Avenue between Los Feliz Boulevard and Glendale Boulevard that would reduce operational impacts to less than significant under CEQA. No changes have been made to the Final EIR/EIS in response to this comment.

846-1503

The commenter requests that before any construction begins, the Authority engage in a design and review process with the community with regard to noise mitigation as required by AVQ-IAMF#1 and AVQ-IAMF#2. IAMFs are incorporated into the HSR Build Alternative and will be implemented by the Authority as an integral part of the HSR Build Alternative if the project is approved. Therefore, per AVQ-IAMF#1, the Authority will provide examples of aesthetic treatments to local jurisdictions prior to construction. In addition, per AVQ-IAMF#2, the Authority will consult with local jurisdictions on how best to involve the community in the process, solicit input from local jurisdictions on their aesthetic preferences, and work with local jurisdictions to review designs and local aesthetic preferences to incorporate them into final design and construction.

846-1504

The commenter expresses disappointment that Key View 12 is shown from the perspective of the Glendale Station and its passengers. Refer to response to comment 793-1423, contained in this chapter of this Final EIR/EIS for a discussion on why Key View 12 is representative of visual impacts in this area.

846-1505

The commenter has requested that at least some of the storage facility behind the railroad tracks be retained as to buffer noise impacts and protect the viewshed of the mountains. At this stage of project design, the removal of the storage facility is necessary. Refer to response to comment 793-1424 contained in this chapter of the Final EIR/EIS.

846-1506

The commenter requests that the Authority engage the community regarding any excess land from the acquisition of the storage facility. The commenter further states that a cell tower of any kind would be an unacceptable future use. Please refer to response to comment 793-1425 contained in this chapter of the Final EIR/EIS regarding excess property and location of a cell tower on that excess land.

Response to Submission 846 (Juanita Myers, Central Atwater Residents, August 6, 2020) - Continued

846-1507

The comment states that the development of commercial and/or residential buildings would be unacceptable on central Atwater property. The HSR Project does not propose the construction of any commercial and/or residential buildings.

846-1508

The commenter objects to the siting of one of the HSR project radio transmitters and asks that it be relocated to a nonresidential area. All proposed locations for HSR project radio sites—including the one in question—are in areas zoned commercial/industrial and are immediately adjacent to the existing railroad right-of-way.

The Authority notes that these transmitters are low power (10 watts) and operate at frequencies well separated from other radio uses. The Authority does not anticipate radio interference or health hazards of any kind from these transmitters, even when standing at the tower base.

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

846-1509

Refer to Responses to Comments 846-1500 through 846-1508, contained in this chapter.

Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020)

DATE 07/31/2020

TO: High Speed Rail, Burbank – Los Angeles Project Section

ATTN: Burbank to Los Angeles Draft EIR/EIS Comment, 355 S Grand Avenue, Suite 2050, Los Angeles, CA 90071
Burbank_LosAngeles@hsr.ca.gov / burbank_losangeles@hsr.ca.gov
Meethersocal.org www.hsr.ca.gov

CC:

FROM: Dr. Tom Williams, Senior Technical Adviser, Citizens Coalition for A Safe Community 4117 Barrett Rd., Los Angeles, CA 90032, 323-528-9682
Ctwilliams2012@yahoo.com

SUBJECT: Draft EIR/EIS Comment
RE: HSR - Burbank-LA DEIR/DEIS

Based on: https://hsr.ca.gov/programs/environmental/eis_eir/draft_burbank_los_angeles_comment.aspx

General Comments:

- 777-1262 Geological Conditions
What are the seismic magnitude, depth, distance, and duration parameters used for the designs for any elevated structure?
**Provide technical review and confirmation from the SCEC/Caltech-USC.
Provide fore-warning seismological stations along the LA County sections of HSR**
- 777-1263 CEQA requires inclusion of a Mitigation, Monitoring, and Reporting Plan (MMRP) in the FEIR.
Provide a draft copy of all MMRP elements as part of the DEIR, withdraw current version, revise, and recirculate. Include online quarterly reporting and annual summary for all past and project activities, including Scopes, Schedules, and Resources used/required.
- 777-1264 **Withdraw/Revise/Recirculate/Provide Publicly Accessible Documents for all referenced/cited reports/documents within the DEIR text, including page/paragraphs for those in documents of ten or more pages, either online or in appendices.
Eliminate all references/citations in footnotes and allow only clarification of issues within the text.**

Provide technical drawings as part of Project Description/Requirements for all above and below grade clearances required wherever crossing other infrastructures, waterways, and transportation rights-of-way.
- 777-1265 **What are clearances for Project Section:**
1. above LA River walls/levees and bridges along East/West sides railroad tracks
2. Beneath the Hi-Voltage Power Lines on both sides of the LA River
3. Above the SR-110/I-5 interchange structures
- 777-1266 **Provide single section for definitions for feasible, reasonable, and practical and consistently apply throughout. If definitions include financial/economic. Provide section for financial/economic quantitative assessment of all such usage.**
- 777-1267 **Provide a section for Environmental Justice, including racial/ethnic and economic (including incomes and assets) for populations within 10,000ft.**
- 777-1268 **Provide assessment of HSR section on the existing and probable land uses for Northeast Community Plan area, including B-LAHSR Project, Atwater Village, Cypress Park, Glassell Park,**

- 777-1268 Highland Park, Eagle Rock, El Sereno, Garvanza, Hermon, Lincoln Heights, Montecito Heights, Monterey Hills, and Mount Washington, among others.
- 777-1269 **Provide assessment of transportation for the HSR when the DTLA Congestion Pricing – ParkNRides is applied, e.g., say 2040.**
- 777-1270 **Provide thorough quantitative review/comparison/assessment of HSR with current projections to 2045 by SCAG's**
Population Households Employment Taxes
Hh > Employment = Out Commutes
Employment > Population or Households = In Commuting
Owner-Occupants vs Tenants 25% Annual Hh Inc
Transportation Analysis Zones (Census – Block Groups)
- 777-1271 **Provide assessment of Transportation Analysis Zones along the section**
http://qisdata-scaq.opendata.arcgis.com/datasets/aacd9bf03dfd4e778d969d1f193fd5a6_0?geometry=118.325%2C34.052%2C-118.064%2C34.102&selectedAttribute=ID_TAZ12a
http://qisdata-scaq.opendata.arcgis.com/datasets/aacd9bf03dfd4e778d969d1f193fd5a6_0
- 777-1272 Based on current draft Memorandum Of Understanding Between California High-Speed Rail Authority And State Water Resources Control Board...the Project is comprised of ten (10) separate project sections as set forth below: ... • Burbank to Los Angeles, • Los Angeles to Anaheim, • Los Angeles to San Diego.
The AUTHORITY understands that it shall enroll in, or apply for, any other necessary permits, including NPDES permits, as required under state and federal law. Expedited permitting is necessary to ensure that the time period stipulated in the granting of federal funds for construction of the Project is achieved.
**Provide all available information regarding the physical and operational relationships for the B-LAUS track and station sections and those of LA-Anah and LA-SD, specifically to north and south of the Union Station and to southerly to Anaheim and easterly to San Diego.
Provide impacts assessments for growth inducement and secondary effects of the B-LAUS completion for related extensions from LAUS.
Provide the economic relationships of the B-LAUS segment during construction and entail operations of the LAUS-SD and -Ana sections.**
- 777-1273 **More Detailed Comments (ES = Executive Summary, 5-18/1 = Section 5, pg. -18, paragraph 1)**

**ES 5-17/ Figure S-5 Preliminary Station Elements Plan, Los Angeles Union Station
Provide alternatives connections to ElMonte/SanDiego (Easterly) or Anaheim (Southerly) with the B-LA section.**

ES 5-18/1
S.6 Design Considerations to Avoid and Minimize Impacts The Authority has committed to integrate programmatic IAMFs into the HSR project consistent with the following:
(1) 2005 Statewide..., (2) 2008 Bay Area..., and (3) 2012 Partially Revised...
Project design includes considerations to avoid and minimize environmental and community impacts through incorporation of the following additional measures:
• Follow existing transportation corridors to the extent feasible
**Railroad corridors, not highway.
Port-Inland Freight Rail**
Provide definitions and assure consistent usage throughout for “Railroad” and “Highway” corridors for feasible, feasibility, practical, to extent practical, and other such verbal but unquantified generalities:
• Span water crossings where practical
• Use shared right-of-way when feasible
• Include passages for wildlife movement
• Include narrowed footprint with elevated or retained cut profile
- 777-1274
- 777-1275

Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

777-1275

- Avoid sensitive environmental resources **to the extent practical**
- Define and compare application of feasible and practical and of “extent practical”.**
- Provide locations where practical and feasible measures will be included.**
- Provide B-LAUS section map with indicators as to where IAMF measures would be located and provide samples of engineering drawing related to such examples.**
- Include vs where/when practical/feasible**
- Why differences-**
- Where practical/feasible vs to the extent practical/feasible**
- Where vs When practical/feasible**
- Identify such on map and by mileposts or bridgements**

https://hsr.ca.gov/high_speed_rail/project_sections/burbank_los_angeles.aspx_pargh.6 The approximately 14-mile project section proposes to utilize the existing railroad right-of-way to the **greatest extent possible**, adjacent to the Los Angeles River, through the cities of Burbank, Glendale and Los Angeles with proposed stations near the Hollywood Burbank Airport and at LAUS.

Define, compare, and provide application of “greatest extent possible” compared to where practical and when feasible.

777-1276

ES 5-17/ Figure S-5 Preliminary Station Elements Plan, Los Angeles Union Station
Provide drawings and descriptions for alternatives connections and passenger pathways for B-LAUS and those to ElMonte/San Diego and to Anaheim.

777-1277

Provide Publicly Accessible References as internet sources or amended appendices, and Provide footnotes for specific page/paragraphs in any document of greater than 10 pages, such as those below from the DEIR/DEIS, examples, many more included:

12-1 California High Speed Rail Authority (Authority).

..... 2012. Final Bay Area to Central Valley High-Speed Train (HST) Partially Revised Program Environmental Impact Report (EIR).

..... 2014. Burbank to Los Angeles Section: 2014 Scoping Report. November 2014.

.....

..... 2019a. Link Union Station Project Draft Environmental Impact Report/Environmental Impact Statement.

..... 2019b. Link Union Station Project Final Environmental Impact Report/Environmental Impact Statement. Los Angeles Department of Water and Power. 2016. 2015 Urban Water Management Plan.

.....

12-3 2014c. California Statewide Travel Demand Model, Version 2.0. October 2014.

..... 2012a. Bay Area to Central Valley High-Speed Train Partially Revised Final Program Environmental Impacts Report (EIR). Sacramento, CA: California High-Speed Rail Authority.

.....

12-11 2018a. California High-Speed Rail 2018 Business Plan. Technical Supporting Document: Ridership and Revenue Risk Analysis. June 1, 2018.

.....

California High-Speed Rail Authority and Federal Railroad Administration (Authority and FRA). 2008. Bay Area to Central Valley Final Program Environmental Impact Report/ Environmental Impact Statement for the Proposed California High-Speed Train System. May 2008.

..... 2008. Record of Decision for the Bay Area to Central Valley High-Speed Train Final Program Environmental Impact Report/Environmental Impact Statement. December 2, 2008.

No references are publicly available/accessible for these and many others, and they are not provided in appendices, please provide.

777-1278

Use of Footnotes rather than References

3.1-3 3.1.3.3 Consistency with Plans and Laws This section addresses CEQA and NEPA requirements to describe a proposed project’s inconsistencies or conflicts with applicable regulations, plans, and policies. The Council on Environmental Quality regulations require a **discussion of conflicts** between the proposed undertaking and the **objectives of federal, state, regional, and local, and tribal \2 land use regulations**, plans, policies, and controls for the areas concerned, as well as a description of the extent to which the

777-1278

Authority would reconcile the inconsistencies (...). A complete inventory of the pertinent regional and local policies....This includes the following:
Footnote \2 No designated tribal lands exist in the vicinity of the Burbank to Los Angeles Project Section; therefore, no analysis of tribal land use policies is provided.
No references are publicly available/accessible and not in appendices; Provide such.

777-1279

3.1-8 Projected future environmental conditions without the HSR Build Alternative....Some resources (transportation, air quality, and energy) include additional discussion of the impacts of the HSR Build Alternative in the **opening year, or “date of implementation,” of HSR operations (2029),....\3**
Footnote \3 For purposes of the analysis provided in this Draft EIR/EIS, **assumptions from the 2016 Business Plan** were used, including an existing conditions baseline of 2015, an opening year for HSR operations of 2029, and a horizon year for HSR operations of 2040.
No references are publicly available/accessible and not in appendices; Provide such.

777-1280

3.1-2

- Mitigation Measures—**Site-specific mitigation measures** where impacts cannot be otherwise avoided or reduced through design or through implementation of best management practices....

No references are publicly available/accessible and not in appendices; Provide such.

777-1281

The analyses in this chapter address the impacts of the HSR Build Alternative, including the track, new and modified stations, and other related HSR facilities described in Chapter 2, Alternatives. The analyses also evaluate impacts associated with related infrastructure changes required to accommodate the HSR Build Alternative, such as roadway and interchange modifications, utility relocation, and addition of power substations. **This chapter also analyzes mitigation, impacts resulting from mitigation, and the feasibility of mitigation.**
No references are publicly available/accessible and not in appendices; Provide such.

777-1282

Analysts used many sources to prepare this document. Chapter 12, **References, lists these sources.**
 3.1.2 Chapter 3 Organization Chapter 3 presents the **environmental resource topics** as follows:....
No references to Mitigation, Monitoring, and Report Plan/Program for CEQA/FEIR.

1-9/5 Responsible agencies under CEQA are defined in Public Resources Code § 21069 as “any public agency, other than the lead agency, which has responsibility for carrying out or approving a project.” Responsible agencies under CEQA for the Burbank to Los Angeles Project Section include the following agencies:

- California Department of Fish and Wildlife
- **Caltrans**
- California Public Utilities Commission, **Los Angeles Office**
- California State Lands Commission
- **State Water Resources Control Board**
- **Los Angeles County Flood Control Board**

777-1283

Responsible agencies are not consistently designated and revise and provide equivalences for transportation, transit, water, and air sectors and for relevant local, regional or state level offices, such as:

CalTrans District 7; CPUC-LAOffice; California/State Air Resources Board or South Coast Air Quality Management District; Per MOA with State Water Resources Board but not LA Regional Water Quality Control Board.

777-1284

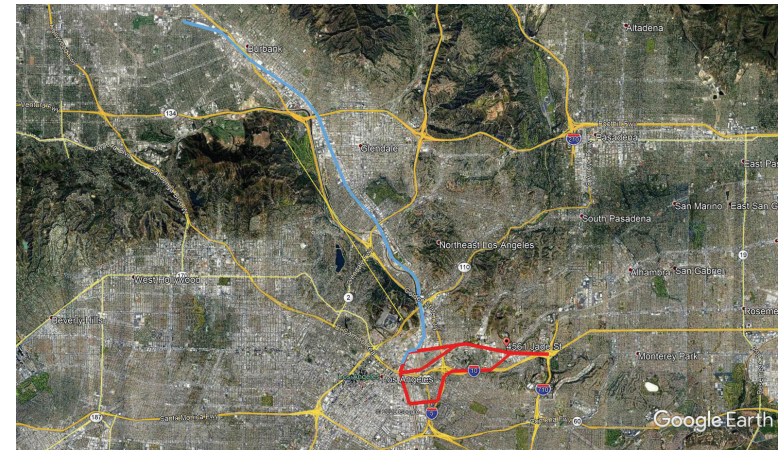
1-9 FNM4 The STB is an independent federal agency with jurisdiction over the construction and operation of new rail lines (49 U.S. Code §§ 10502, 10901). In **2013**, the STB **determined it has jurisdiction...**including the Burbank to Los Angeles Project Section, because of the HSR system’s connection to the existing interstate rail network (**STB, Docket No. FD 35724, April 18, 2013**).
Provide publicly accessible references for such discussion.

Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

777-1285	<p>1-10/3 As the most current expression of federal multimodal transportation policy, the FAST Act seeks to improve surface transportation infrastructure, including roads, bridges, transit systems, and the passenger rail network...., meaning states and local governments can move forward with critical transportation projects, such as new highways and transit lines, with the confidence that they will have a federal partner over the long term. Overall, the FAST act maintains current program structures and shares funding between highways and transit. The law also makes changes and reforms...., including streamlining the approval processes for new transportation projects and financing, providing new safety tools, and establishing new programs to advance critical freight projects. As an EIR/EIS, provide appropriate publicly accessible references or appendices to support this discussion.</p>	777-1292	<p>Implementation of the recommendations above would require special types of trackwork to eliminate gaps, which create noise impacts, to reduce noise levels generated from rail turnouts. This measure would be conducted within the HSR rail right-of-way and staging areas. The increase in noise and vibration would be minimal to negligible in comparison to the scope of the project. Therefore, the impacts of mitigation would be less than significant under CEQA. Provide basis for why any increase in noise/vibration by eliminating the gaps . Revise: "...reducing and eliminating the gaps would reduce noise/vibration to minimal to negligible." Revise and eliminate "in comparison to the scope of the project". Here statement indicates "less than significant" while below the vibration and noise remain severe. Clearly identify and require closure of all Rail-Rail gaps, provide for plastic/rubber absorbing pads/cushions for all Rail/Ties connector and include all isolation/insulation of Ties/Underlying Bases.</p>
777-1286	<p>1-11/2 1.2 Purpose of and Need for the High-Speed Rail System and the Burbank to Los Angeles Project Section Provide definitions and interrelations for Purposes, Needs, Goals, and Objectives along with appropriate references and/or appendices; Provide consistent application of such throughout the DEIR/DEIS.</p>	777-1293	<p>3.4-55/6 Under NEPA, operation of the HSR Build Alternative would result in noise impacts to sensitive receivers. Although the implementation of mitigation measures N&V-MM#3 through N&V-MM#5 would reduce HSR Build Alternative noise impacts, severe residual noise impacts would still remain at 48 locations. Ground-borne vibration and ground-borne noise impacts would occur at 12 locations. Here statement indicates less than significant" while below the vibration and noise remain severe and cannot be fully mitigated by #5. Here statement indicates "less than significant" while below the vibration and noise remain severe. Clearly identify/require closure of all Rail-Rail gaps and provide for plastic/rubber vibration-absorbing cushions for all Rail/Ties connectors, for all rail-on-tie isolation, and for isolation/insulation of Ties/Underlying Bases.</p>
777-1287 777-1288	<p>1.12/1 • Provide station locations with existing and planned transit-oriented development potential 1-12/2 While these CEQA project objectives are not directly incorporated into the purpose and need under NEPA, an alternative's ability to achieve these CEQA project objectives will be considered in evaluating the reasonableness of an alternative under NEPA. Provide definitions and interrelations for Purposes, Needs, Goals, and Objectives along with appropriate references and/or appendices; Provide comparisons of P&N and G&O and which are not included in the other. Provide consistent application of such throughout the DEIR/DEIS.</p>	777-1294	<p>S-1/4 The Los Angeles Metropolitan Transportation Authority (Metro) owns the railroad right-of-way, the Southern California Regional Rail Authority owns the track and operates the Metrolink commuter rail service, the National Railroad Passenger Corporation (Amtrak) provides intercity passenger service on the existing tracks, and the Union Pacific Railroad holds track access rights and operates freight rail in the corridor. With shared ROW, provide current and project rail traffic on all lines, including that of HSR for the same period as the SCAG Transportation Plan period, 2020-2045. Provide risk assessment of operations and maintenance requirements for all lines in Section corridor and risk of HSR disruption due to failures on associated rail section in this congested corridor.</p>
777-1289	<p>3.4-41/1 the receivers to the proposed track and the speed of the train. The results also indicate severe noise impacts to the ATX Arts and Innovation Complex, a theater at 3191 Casitas Avenue in the city of Los Angeles, and Atwater Village Theatre, a theater at 3265 Casitas Avenue in the city of Los Angeles. Mitigation measures N&V-MM#3 through N&V-MM#5 would be needed and are described in more detail in Section 3.4.7. These measures include the construction of sound barriers, noise insulation considerations, and vehicle specifications and special trackwork that would reduce noise impacts. Although the implementation of mitigation measures N&V-MM#3 through N&V-MM#5 would reduce the operational noise impacts of the HSR Build Alternative, noise impacts...would still remain. The sound barrier analysis in Table 3.4-21...shows that even with the implementation of mitigation measure N&V-MM-#3, severe residual impacts would remain. Provide detailed description of MM#5 and their successful and deficient applications/location in the B-LAUS Section. If in other documents provide report, page, and paragraphs.</p>	777-1295	<p>S-1/5 Impact avoidance and minimization features (IAMF) = Mitigation measures Provide definitions and distinctions of IAMF and mitigation measures. Eliminate use of IAMF and use only "programmatic mitigation measures" and PMM.</p>
777-1290	<p>3.4-43/3 Therefore, with implementation of mitigation measures...and N&V-MM#5, impacts on sensitive receivers from operational vibration would be less than significant after mitigation. No quantitative assessments and comparison are provided/ Provide such in revised DEIR/DEIS.</p>	777-1296	<p>S-19/2 These impacts are assessed assuming IAMFs have been incorporated as part of the proposed project, though mitigation may also be required to avoid or reduce significant impacts. Capital costs are presented as well as impacts on Section 4(f) and 6(f) resources and environmental justice populations Remove "assuming" and replace with "required". No impacts can be properly assessed based only on "assuming" rather than "requiring" and must be incorporated into the Mitigation, Monitoring and Reporting Plan for the FEIR, Provide draft in a revised/recirculated DEIR/DEIS.</p>
777-1291	<p>3.4-52/6 N&V-MM#5: Special Trackwork....The report shall address the minimization/elimination of rail gaps at turnouts. Because the impacts of HSR wheels over rail gaps at turnouts increases HSR noise by approximately 6 dB over typical operations, turnouts can be a major source of noise impact. If the turnouts cannot be moved from sensitive areas, the noise technical report will...53/1... recommend the use special types of track work that eliminate the gap. The Authority will require the project design to follow the recommendations in the approved noise impact report. Provide special track work measures and their location. Provide additional measures for reducing noise/vibrations from wheel/rail to the environment. Such as isolation pads between rail and ties, padded fasteners from rail/tie, pads between ties and underlying supporting base, especially for bridges, changes in slopes, and turns. Provide locations and further analyses as to unmitigated, mitigated, and remaining impacts.</p>	777-1297	<p>S-20/6 The impact analysis takes into account project design features, IAMFs, and compliance with regulatory requirements to avoid or reduce impacts prior to application of mitigation measures. Provide clarified definitions and distinctions of IAMF and "mitigation measures". Eliminate use of IAMF and use only "programmatic mitigation measures" and PMM.</p>
	<p>3.4-53/2 Impacts from Implementing Mitigation Measure N&V-MM#5</p>	777-1298	<p>Table S-3 included at the end of this document summarizes the IAMFs mentioned in the discussions. Provide definitions, distinctions, and summary of IAMF AND mitigation measures used by Section elements (say for each 2000ft of Section). Eliminate use of IAMF and use only "programmatic mitigation measures" and PMM.</p>

Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

- 777-1299 | Many regulations require **standard measures** to avoid and minimize environmental impacts. The Authority will comply with these regulations, and therefore, such measures are not summarized here. *Provide definitions, distinctions, and summary of standard measures, IAMF, and mitigation measures used by Section elements (say for each 2000ft of Section). Eliminate use of “standard measures” and IAMFs*
- Feasible** mitigation measures would be applied to avoid or reduce impacts from construction and operation of the HSR Build Alternative. A determination of the level of significance before and after mitigation measures are applied is required under CEQA. **In most cases**, these mitigation measures would **reduce impacts to a less than significant level**. *Provide definitions, distinctions, and summary of feasible and not-feasible mitigation measures used or considered by Section elements (say for each 2000ft of Section).*
- 5-15/1** 5.5.8 Oil and Gas Wells The Burbank to Los Angeles Project Section...Oil and gas wells within the RSA were evaluated for their potential release of hazardous gases such as methane, carbon dioxide, and **hydrogen sulfide**. According to the DOGGR online mapping system, there are no gas wells within the RSA, but multiple known oil wells are mapped within the RSA. See Figure 5-4 for the locations of the oil wells (DOGGR 2016). According to information provided in the DOGGR online map, there are four plugged and abandoned dry holes within the RSA.
- 777-1300 | *Provide historic aerial photographic (Fairchild aerial photos of 1923, -28, -33& -38 are available from EDR) review of Section corridor to identify and clarify locations of reported and unreported oil wells and dry holes in Section Corridor. Review ground gas conditions (CH4 and H2S, >100ppm in soil for both) encountered during the construction of the Red Line Station and tunnels which required specialized groundwater treatment and degassing for excavations and tunneling east of Alameda. Require methane gas surveys of Section Corridor as the corridor lies within the boundaries of several oil fields and the City of LA requires such surveys especially in vicinity of William Mead Housing and Union Station.*
- 777-1301 | *Provide the Section corridor rights-of-way south of Main Street to the south end of the Metro rail yard US 101 – East 4th Street and the Section interfaces with the Anaheim and San Diego Sections. Provide projected train traffic on and through such Sections and switching, say 2040 and 2045.*
- 6mi Yellow B-LA (Blue) LA-Anah/SDiego. (Red)



Response to Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020)

777-1262

The commenter has requested information regarding the seismic magnitude, depth, distance, and duration parameters used for the design of the elevated structures. The information that the commenter is requesting is beyond the current scope of the preliminary plans that comprise the PEPD. The seismic design parameters would be generated for each structure as part of a Preliminary Foundation Report, and subsequent Foundation Reports, in future stages of design as part of site-specific ground motion analyses. As site-specific geological/geotechnical data is required for seismic analyses at each individual site, this information would be available at that time.

777-1263

The commenter states that CEQA requires a Mitigation, Monitoring, and Reporting Plan (MMRP) in the Final EIR. The commenter requests that a draft copy of all MMRP elements be provided as part of the Draft EIR and that the Draft EIR be recirculated. An MMRP/MMEP has been prepared for the Final EIR/EIS and is included as part of the approval package which can be found on the Authority's website. Because it is not required by CEQA that an MMRP be included as part of the Draft EIR, the Authority will not be recirculating the draft environmental document.

The commenter also requests that online quarterly reporting and an annual summary for project activities be provided. The contract requirements that will be undertaken by the design-build contractor will be monitored throughout construction. Performance data will be collected through the Authority's Environmental Mitigation Monitoring Assessment (EMMA) database. This data, as well as Authority performance information, will be assembled into an annual report.

777-1264

The comment states that references should be provided as publicly accessible documents and recirculated with the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). The comment also requests that citations provide specific page/paragraph references, and that the footnotes within the Draft EIR/EIS eliminate all citations and contain only clarification issues within the text. Finally, the comment requests that the Draft EIR/EIS provide technical drawings as part of the Project Description/Requirements for all above- and below-grade clearances required wherever crossing other infrastructure, waterways, and transportation rights-of-way.

For the purpose of environmentally clearing a proposed project under the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA), it is not required that a Draft EIR/EIS include every reference as a publicly available document. Many references, such as those utilized for a cultural resources analysis, contain sensitive information that cannot be made publicly available in order to maintain the privacy and protection of valuable resources. Additionally, many references cannot feasibly be made available due to the costs associated with obtaining the rights that would be necessary for the California High-Speed Rail Authority (Authority) to distribute information previously published by another entity. Where references are already publicly available, URLs have been provided in Chapter 12, References, of the Draft EIR/EIS.

There is no requirement under CEQA or NEPA to provide and/or circulate all referenced reports and documents within the Draft EIR/EIS text, nor to provide specific page and paragraph references for these documents.

Refer to Volume 3 of both the Draft and Final EIR/EIS for technical drawings for all project components described in Chapter 2 of the EIR/EIS.

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

Response to Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

777-1265

The commenter has requested information regarding the clearances for the Project Section at three locations: 1) above the Los Angeles River walls/levees and bridges along the east and west sides of the railroad tracks, 2) beneath the high-voltage power lines on both sides of the Los Angeles River, and 3) above the State Route 110/Interstate 5 interchange structures. Vertical clearance information for the proposed HSR facilities above the walls of the Los Angeles River and below the State Route 110/Interstate 5 interchange structures including the Verdugo Wash Bridge, the Main Street Bridge, and improvements supported by the existing Downey Bridge and Mission Tower Bridge is provided in PEPD plans included in Volume 3 of this Final EIR/EIS. One exception is the recently constructed Riverside Drive Bridge which was under construction at the time of HSR project design. The proposed structures beneath high-voltage power lines to both sides of the Los Angeles River include proposed trackwork and OCS, the Downey Bridge and related improvements, HSR communication towers, and associated train control facilities spanning the length of the corridor from the CMF to Main Street. A survey of the overhead transmission lines is needed to provide the exact requested information, which would take place in a future phase of design. However, based on initial investigation as part of the PEPD process the project features are expected to not interfere with the existing power lines in the area.

777-1266

The commenter requests that a single section for definitions for feasible, reasonable, and practical be provided and that those terms be applied consistently throughout the document. Chapter 13 of the Draft EIR/EIS included a definition for feasible. Definitions for reasonable and practical have been added to Chapter 13 of this Final EIR/EIS. These terms have been applied consistently throughout the Final EIR/EIS.

777-1267

The commenter requests the inclusion of a section on environmental justice (EJ), including racial/ethnic demographics and economic analysis (including incomes and assets) for populations within 10,000 feet of the alignment. Section 5.4, Affected Environment, of Chapter 5, Environmental Justice, provides demographic information, including low-income and minority populations, within the EJ resource study area (RSA), which includes all census tracts within a 0.5-mile radius of the HSR Build Alternative footprint. The RSA was defined in accordance with the Authority's Environmental Methodology Guidelines Version 5.09 (Authority 2014) and considers the full range of reasonably foreseeable EJ impacts associated with the HSR project. As discussed in Section 5.3.2.2 of this Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS), individuals more than 0.5 mile from the HSR Build Alternative are not likely to experience the direct and indirect effects of construction and operation of the HSR Build Alternative. Therefore, the 0.5-mile radius of the HSR Build Alternative footprint is adequate for the EJ RSA.

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

Response to Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

777-1268

The commenter requests the inclusion of an assessment of the HSR project on the existing and probable land uses within the Northeast Community Plan area in Los Angeles. Section 3.13.6.3 in Section 3.13, Station Planning, Land Use, and Development, provides a detailed analysis of temporary and permanent conversion of existing and planned land uses within the station planning, land use, and development RSA, which includes the project alignment footprint plus a 150-foot buffer and a 0.5-mile buffer around the Burbank Airport Station and Los Angeles Union Station (LAUS). Portions of the station planning, land use, and development RSA are within the Northeast Community Plan area as shown on Figure 3.13-1, Resource Study Area for Station Planning, Land Use, and Development, in Section 3.13.4.1, and have been considered in the analysis.

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

777-1269

The commenter requests an assessment of future congestion pricing. The details of any downtown Los Angeles congestion pricing program are not currently available in sufficient detail to allow for meaningful analysis in either the TTR or Final EIR/EIS. Further, as the DTLA Congestion Pricing project was not identified in the 2014 FTIP by SCAG or other adopted long-range plans, and the information was not available for analysis under the Draft EIR/EIS. No revisions to this Final EIR/EIS have been made in response to this comment.

777-1270

The commenter requests the inclusion of a quantitative review/comparison/assessment of the HSR project with the Southern California Association of Governments' (SCAG) growth projections through 2045.

As discussed in Section 3.12.4, Methods for Evaluating Impacts in Section 3.12, Socioeconomics and Communities, of this Final EIR/EIS, the data used in the analysis are derived from various sources, including the U.S. Census Bureau, the California Department of Finance, the California Employment Development Department, and various county and city agencies. These data sources provide the context for the environmental analysis and the evaluation of impacts. SCAG's population growth forecasts to 2040 for the Cities of Burbank, Glendale, and Los Angeles are provided in Table 3.12-4, City and Population Growth, in Section 3.12.5. SCAG's employment growth forecasts to 2040 for Los Angeles County and the State are provided in Section 3.18, Regional Growth, in Table 3.18-4, Regional Long-Range Employment Projections, 2017 and 2040. Projected housing to 2040 was estimated based on SCAG's population growth estimates, divided by the average number of resident per housing unit in each jurisdiction, using the methodology described in Section 3.18.4, Methodology for Impact Analysis, as shown in Table 3.18-8, Existing and Projected Housing Units. The data used in these tables were from SCAG's 2016 Regional Transportation Plan/Sustainable Communities Strategy which were the most current data available at the time the analysis was initiated.

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

Response to Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

777-1271

The commenter provides a link to SCAG's GIS data portal showing the region's Transportation Analysis Zones, which are used in travel demand forecasting. According to SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Transportation Analysis Zones are similar to census block groups. Transportation Analysis Zones with a higher concentration of minority population or low-income households are used by SCAG when developing their environmental justice study areas for projects. For the Burbank to Los Angeles Project Section, the resource study area for the environmental justice analysis includes all census tracts within a 0.5-mile radius of the HSR Build Alternative footprint, including support facilities and stations.

Where minority or low-income populations were identified within the study area, the impacts experienced by that population were compared with the resource study area and the larger reference community (Los Angeles County) to determine whether the project would result in a disproportionately high and adverse impact. In addition, in determining whether the impact would be disproportionately borne by a minority and/or low-income population, the analysis considered if the project would implement measures to avoid or reduce the adverse effect, and/or provide benefits that would affect the minority and low-income populations.

777-1272

The commenter states that the Authority shall enroll in, or apply for, any other necessary permits, including National Pollutant Discharge Elimination System (NPDES) permits, as required under state and federal law. The Authority is fully committed to obtaining the necessary permits in a timely manner.

777-1273

This comment requests all available information regarding the physical and operational relationships for the Burbank to Los Angeles Project Section tracks and station locations to those of the connecting project sections.

The commenter also requests the assessment of impacts for growth inducement and the secondary effects of the completion of the project section for related extensions from LAUS. The commenter also requests the assessment of the economic relationship of the Burbank to Los Angeles segment during construction and operation to the neighboring project sections.

Refer to Section 3.19.8, which includes consideration of adjacent HSR project sections (Palmdale to Burbank and Los Angeles to Anaheim) where appropriate for each environmental resource under consideration. For cumulative impacts, the RSA includes the geographic extent of each affected resource within which project impacts would accumulate or interact with the impacts of other planned projects, including adjacent HSR project sections.

As described in Chapter 1.1.2, Purpose, Needs, and Objectives, the Authority and FRA used a tiered environmental review process to support tiered decisions for the HSR system. Tiering of environmental documents means addressing a broad program in "Tier 1" environmental documents, then analyzing the details of individual projects within the larger program in subsequent project-specific or "Tier 2" environmental documents. The Statewide Program EIR/EIS (Authority and FRA 2005) provided a programmatic analysis of implementing the HSR system across the state and compared it to the impacts of a No Project Alternative and a modal alternative that involved expanding airports, freeways, and conventional rail to meet the state's future transportation needs. In accordance with the tiered approach to environmental review described above, the Authority is preparing Tier 2 (project-level) EIR/EISs for individual sections of the statewide HSR system. Each Tier 2 EIR/EIS includes a section of the HSR system that serves a useful transportation purpose on its own and could function independently even if the adjacent sections were not completed. Consistent within this approach, this Final EIR/EIS was prepared as a Tier 2 EIR/EIS to analyze impacts specifically within the Burbank to Los Angeles Project Section.

Refer to Section 2.3 in Chapter 2, Alternatives, for general information about the

Response to Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

777-1273

performance criteria, infrastructure components and systems, and function of the proposed HSR system as a whole.

Additionally, refer to the 2020 Business Plan (Authority 2020) for the implementation and delivery strategy of the HSR project. As described in the 2020 Business Plan, the rail infrastructure provider will interface with the system operator and will be responsible for integrating the other elements of the HSR system (high-speed trains, civil works, and facilities) so the system works seamlessly.

Refer to Section 3.18.6.3 in Section 3.18, Regional Growth, for discussion of temporary and permanent impacts related to regional growth, including population and employment growth, in the project section. Additionally, refer to the Final Program EIR/EIS for the proposed California High-Speed Train System (Authority and FRA 2005), Chapter 5, Economic Growth and Related Impacts, for an assessment of economic impacts of the HSR project as a whole.

777-1274

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

The commenter requests that alternative connections to El Monte/San Diego or Anaheim be provided. The Burbank to Los Angeles Project Section would connect to the Los Angeles to Anaheim Project Section south of Los Angeles Union Station, and the overall HSR system will eventually connect to San Diego. Refer to BLA-Response-Chapter 2 Alt-01: Alternatives for a more detailed description of the development of alignment alternatives within the Burbank to Los Angeles Project Section. No revisions to this Final EIR/EIS have been made in response to this comment.

777-1275

The commenter requests that the Summary provide definitions and ensure consistent usage throughout for “Railroad” and “Highway” Corridors, as well as for “feasible,” “feasibility,” “practical,” “to extent practical,” and other such verbal but unquantified generalities. The Final EIR/EIS applies these terms consistent with their typical dictionary definition. The commenter also requests provision of locations where practical and feasible measures will be included. At this stage of project design, any locations of practical and feasible measures have been included in the Final EIR/EIS. Measures, including locations, will be further refined during final design.

777-1276

The commenter requests that drawings and descriptions for alternative connections and passenger pathways for Burbank to Los Angeles Union Station and those to El Monte/San Diego and to Anaheim be provided. Connections and passenger pathways for the HSR section from Burbank to LAUS are included in Volume 3 of the Final EIR/EIS. The Burbank to Los Angeles Project Section would connect to the Los Angeles to Anaheim Project Section south of Los Angeles Union Station, and the overall HSR system would eventually connect to San Diego (as a part of Phase 2). Plans and drawings for those sections would be presented to the public at the time the draft environmental documents are published for those sections. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

777-1277

The comment states that references should be provided as publicly accessible documents and requests that citations provide specific page/paragraph references. For the purpose of environmentally clearing a proposed project under CEQA and NEPA, it is not required that the Draft EIR/EIS include every reference as a publicly available document. Many references, such as those used for a cultural resources analysis, contain sensitive information that cannot be made publicly available in order to maintain the privacy and protection of valuable resources. Additionally, many references cannot feasibly be made available due to the costs associated with obtaining the rights that would be necessary for the Authority to distribute information previously published by another entity. Where references are already publicly available, URLs have been provided in Chapter 12, References, of the Draft EIR/EIS. There is no requirement under CEQA or NEPA to provide and/or circulate all reports and documents referenced within the EIR/EIS, nor to provide specific page and paragraph references for these documents in either the EIR/EIS text or in Chapter 12, References. As stated in Section S.2 of the EIR/EIS Summary, electronic copies of the Tier 1 documents noted in this comment are available at no cost on request by calling the Authority office at (916) 324-1541. The Tier 1 documents may also be reviewed at the Authority's offices during business hours at: 770 L Street, Suite 620, Sacramento, CA 95814 and 355 S Grand Avenue, Suite 2050, Los Angeles, CA. Documents from other agencies cited in this comment (e.g., Link Union Station Project Draft Environmental Impact Report/Environmental Impact Statement) are available on those agencies' websites or upon request from those agencies.

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

777-1278

The commenter states that there are no references publicly available or accessible to support the footnote that states that no designated tribal lands exist in the vicinity of the Burbank to Los Angeles Project Section. A reference has been added in Section 3.1.3.3 of this Final EIR/EIS to cite the source of this information. This source has also been added to Chapter 12 of this Final EIR/EIS.

777-1279

The commenter states that there are no references publicly available or accessible to support the footnote that states that assumptions from the 2016 Business Plan were used. A reference providing a link to the 2016 Business Plan has been provided in Section 3.1.3.6 of this Final EIR/EIS and has also been added to Chapter 12. Additionally, all documents cited in Chapter 3 are publicly available and references are included in Chapter 12.

777-1280

The commenter states that no references are publicly available/accessible regarding site-specific mitigation measures. Site-specific mitigation measures are included throughout Chapter 3. Therefore, a reference is not necessary. All documents cited in Chapter 3 are publicly available and references are included in Chapter 12. No revisions to this Final EIR/EIS have been made in response to this comment.

777-1281

The commenter states that no references are publicly available/accessible regarding mitigation, impacts resulting from mitigation, and the feasibility of mitigation. Details regarding mitigation, impacts resulting from mitigation, and the feasibility of mitigation are included throughout Chapter 3. Therefore, a reference is not necessary. Additionally, all documents cited in Chapter 3 are publicly available and references are included in Chapter 12. No revisions to this Final EIR/EIS have been made in response to this comment.

777-1282

The commenter states that there is no reference to an MMRP. Refer to response to comment 777-1263, contained in this chapter of this Final EIR/EIS, regarding the provision of an MMRP and MMEP in the Final EIR/EIS. An MMRP/MMEP has been prepared for the Final EIR/EIS and is included as part of the approval package which can be found on the Authority's website. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

777-1283

The commenter noted that the list of responsible agencies is missing relevant agencies. Section 2.10 includes a full list of CEQA responsible agencies in Table 2-21. No revisions to this Final EIR/EIS have been made in response to this comment.

777-1284

The commenter requested that a publicly accessible reference in regards to the Surface Transportation Board's (STB) jurisdiction be added to the document. A hyperlink was added to Chapter 1, footnote 4 to allow readers to access STB, Docket No. FD 35724, which describes STB's jurisdiction.

777-1285

The commenter requested a reference be made in regards to the FAST Act. Section 1.1.6 of this Final EIR/S was revised to include a reference to the Federal Highway Administration's website which describes the FAST Act, and Chapter 12 was revised to include the reference.

777-1286

The commenter requested that "purposes", "needs", "goals" and "objectives" be defined within the document. The terms "purpose and need" and "objectives" are used within the document to comply with NEPA and CEQA requirements for project definition. The term "goals" does not appear in Section 1.2 or elsewhere in the document except in reference to the use of the term in other reports. NEPA regulations (40 CFR 1502.13) require that an EIS contain a statement of the "purpose and need that "briefly specifies the underlying purpose and need to which the agency is responding in proposing the alternatives, including the proposed action." Section 15124(b) of the CEQA guidelines requires the project description contain a statement of the project objectives, including the underlying purpose of the project. These terms are introduced in Section 1.2 and used consistently throughout the document. "Purpose and need" is defined in the glossary, contained in Chapter 13. Chapter 13 was revised in response to this comment to include a definition of "objectives".

777-1287

The commenter requests the locations of stations with existing and planned transit-oriented development potential. As stated in Section 2.6.3, 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.

777-1288

The commenter requests that "purposes", "needs", "goals" and "objectives" be defined within the document. Refer to Response to Comment 777-1286 in this Chapter of this Final EIR/EIS.

Response to Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

777-1289

The commenter requests more information regarding mitigation measure N&V-MM#5, Special Trackwork. Final locations of crossovers and turnouts are confirmed during final design of the HSR project, and N&V-MM#5 commits the project to providing mitigation where required. No revisions to this Final EIR/EIS have been made in response to this comment.

777-1290

The commenter requests quantification of the noise reductions provided by mitigation measures N&V-MM #4 and N&V-MM #5. As stated in the description of N&V MM-#4 in the Draft EIR/EIS, "The analysis in this EIR/EIS does not assume for its quantitative calculations of post-mitigation impacts that trainsets will be able to comply with the US EPA standard (40 CFR Part 201.12/13), if applicable, cited earlier in this chapter, due to lack of currently-available compliant technology." Therefore, no revisions to this Final EIR/EIS have been made in response to this comment.

777-1291

The commenter requests clarification on proposed special trackwork measures and their locations. The level of design detail requested in this comment is not available at the 15% level of design shown in the project plans provided in Volume 3 of this Final EIR/EIS. Mitigation measure N&V- MM #5 is written to establish the standard that the Authority will adhere to during final design. No revisions to this Final EIR/EIS have been made in response to this comment.

777-1292

The commenter requests clarification on mitigation measure N&V-MM#5. The additional noise and vibration generated by crossovers and turnouts is due to the gap in the rails. With the use of special trackwork, such as spring-rail frogs, the gap in the rails is eliminated and there would be no increase in noise or vibration. The level of design detail requested in this comment is not available at the 15% level of design shown in the project plans provided in Volume 3 of this Final EIR/EIS. Mitigation measure N&V- MM #5 is written to establish the standard that the Authority will adhere to during final design. No revisions to this Final EIR/EIS have been made in response to this comment.

777-1293

The commenter requests clarification between the EIR/EIS text in Section 3.4.8, NEPA Impacts Summary and the text in Section 3.4.9, CEQA Significance Conclusions. The section has been revised to clarify that while there will be potential residual severe impacts related to noise, all ground-borne noise and vibration impacts will be reduced such that neither NEPA or CEQA impacts will remain post-mitigation. The level of design detail requested in the second part of this comment is not available at the 15% level of design shown in the project plans provided in Volume 3 of this Final EIR/EIS. Mitigation measure N&V- MM #5 is written to establish the standard that the Authority will adhere to during final design.

777-1294

The commenter requests current and projected rail traffic for the same period as the SCAG 2020-2045 RTP/SCS, as well as a risk assessment for the corridor. As discussed in Section 3.1.3.5, the existing conditions baseline year used for analysis is generally 2015. Section 2.5.1.6, Table 2-7 includes the assumptions for existing and future train volumes within the Burbank to Los Angeles corridor, as well as the sources for the current and projected train volumes. The sources used at the time the analysis was conducted were consistent with the time period of the SCAG 2016-2020 RTP/SCS, therefore, data from the SCAG 2020-2045 RTP/SCS was not used. In regards to the commenter's request for a risk assessment, Section 3.11.6.3 provides an analysis of train accidents during operation of HSR, the project would implement SS-IAMF #2 and SS-IAMF #3, in addition to complying with standard design practices and regulations, which would therefore reduce the risk of derailment and accidents. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 777 (Dr. Tom Williams, Citizens Coalition for A Safe Community, July 31, 2020) - Continued

777-1295

The commenter requests that definitions of and distinctions between IAMFs and mitigation measures be included in the Summary. Definitions of and distinctions between IAMFs and mitigation measures have been added to Section S.8.2 of this Final EIR/EIS. The commenter also requests that the term "IAMF" be eliminated and that only "programmatic mitigation measures" be used. The term "IAMF" is appropriate because these features are part of the project design and are not measures to mitigate impacts. No revisions to this Final EIR/EIS have been made in response to this portion of the comment.

777-1296

The commenter requests that the word "assuming" be replaced with "required" when referencing IAMFs that have been incorporated into the project design. The word "assuming" has not been replaced with "required," because IAMFs are part of the project definition. However, the word "assuming" has been replaced to state that IAMFs will be implemented because they are part of the project design. IAMFs would avoid and minimize impacts whereas mitigation measures are requirements to mitigate impacts.

777-1297

The commenter requests that definitions of and distinctions between IAMFs and mitigation measures be included in the Summary. Refer to response to comment 777-1295 contained in this chapter of this Final EIR/EIS.

777-1298

The commenter requests that definitions of and distinctions between IAMFs and mitigation measures be included in the Summary. Refer to response to comment 777-1295 contained in this chapter of this Final EIR/EIS.

777-1299

The commenter requests that definitions of and distinctions between IAMFs and mitigation measures be included in the Summary. Refer to response to comment 777-1295 contained in this chapter of this Final EIR/EIS.

777-1300

The commenter requests that the Authority review historical aerial photography of the section to identify and clarify locations of reported and unreported oil wells and dry holes. In addition, the commenter asks that the Authority review ground gas conditions and perform special methane gas surveys for the project. Historical aeriels were reviewed as part of the technical analysis performed for the HSR Project. Gas ground conditions were also evaluated as part of the technical analysis performed for the HSR Project and are discussed in Section 3.10.6.3 of this Final EIR/EIS. In addition, GEO-IAMF#3, Gas Monitoring, requires preparation of a Construction Management Plan addressing how gas monitoring would be incorporated into construction best management practices. Regarding methane surveys, as stated in Section 3.10.4.2, HMW-IAMF#2, Landfill, requires preparation of a technical memorandum that identifies additional methane protection construction procedures for work within 1,000 feet of a landfill, including detection systems and personnel training.

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

777-1301

The commenter is requesting that the Authority provide the section corridor proposed rights-of-way south of Main Street to the south end of the Metro railyard at U.S. Routes 101. The commenter also requests that the Authority provide projected train traffic on and through these sections for 2040 and 2045.

Information regarding right-of-way necessary for the Burbank to Los Angeles Project Section HSR Build Alternative is in Appendix 3.1-A of this Final EIR/EIS. Additionally, Section 2.5.1.6 of this Final EIR/EIS shows projected train volumes for the Burbank to Los Angeles Project Section. Proposed HSR system service from Anaheim to San Diego are not part of the project section evaluated in this Final EIR/EIS, but rather are part of project expansion in Phase 2. Projected train volumes for other project sections are not available at this time and would be presented to the public at the time the draft environmental document is published for those project sections.

Submission 705 (Dr. CLYDE T. WILLIAMS, Citizens Coalition for A Safe Community, 501-C3, July 26, 2020)

Burbank - Los Angeles - RECORD #705 DETAIL

Status : Action Pending
Record Date : 7/26/2020
Submission Date : 7/26/2020
Interest As : Business and/or Organization
First Name : Dr. CLYDE T.
Last Name : WILLIAMS

Stakeholder Comments/Issues :

705-834 | Please provide electronic copies to ctwilliams2012@yahoo.com.
Electronic copies of the technical reports vs appendices
B2LA Project Section Technical Report
available on request by calling Authority office 877-977-1660.

- Transportation Technical Report
- Air Quality and Global Climate Change Technical Report
- Noise and Vibration Technical Report
- Hydrology and Water Resources Technical Report
- Geology, Soils, and Seismicity Technical Report
- Paleontological Resources Technical Report
- Hazardous Materials and Wastes Technical Report

Response to Submission 705 (Dr. CLYDE T. WILLIAMS, Citizens Coalition for A Safe Community, 501-C3, July 26, 2020)

705-834

The commenter requested copies of several technical reports. The commenter was forwarded copies of the technical reports on July 27, 2020. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 688 (Oliver Shokouh, Dealer Operator, July 13, 2020)

Burbank - Los Angeles - RECORD #688 DETAIL

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

Stakeholder Comments/Issues :

Hello,

I am a property owner, and a business owner on San Fernando Road in Glendale.

The properties in question are the following;

3717 San Fernando Road
3711 San Fernando Road
1803 S. Brand Blvd (corner of Brand Blvd and San Fernando Road)
3721 San Fernando Road
3727 San Fernando Road
134 Mira Loma Ave

I checked on your map found on your website, and it states there will be utility lines run under the street at San Fernando Corridor.

688-710

My question is what approximate time frame will this construction take place, assuming all goes as planned and on schedule, and how long will this impact traffic on San Fernando Road adjacent to my business please?

Thank you,

Oliver Shokouh, Dealer Operator/Principle
West Coast Motorcycles, Inc.
dba Harley-Davidson of Glendale
UglyFighters Motorcycles, Inc.
dba Harley-Davidson of Santa Clarita
Mailing Address:
3717 San Fernando Road
Glendale, CA 91204
818-246-5618 XT 102
Fax 818-246-5785
Cell 818-355-1506

Response to Submission 688 (Oliver Shokouh, Dealer Operator, July 13, 2020)

688-710

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

More specific information addressing this comment is provided below. The commenter requests clarification on the HSR Project construction schedule and associated traffic impacts on San Fernando Road. Based on the location of the business identified from the commenter, construction impacts along San Fernando Road in this location would include utility line relocations under the roadway. As discussed in Section 2.9.3, Table 2-18, of this Final EIR/EIS, the construction period for construction-related utility relocation activities that could affect intersections along San Fernando Road would last approximately five years. Furthermore, as construction related to utility relocation would occur in a linear fashion, the entire segment of San Fernando Road near the commenter's business would not be under construction for the entirety of the five years. As discussed in Section 3.2.6.3 of this Final EIR/EIS, the Authority would implement the following IAMFs to address construction-related impacts on roadways, including San Fernando Road. SS-IAMF#1 would require the contractor to develop a detailed Construction Safety Transportation Management Plan (CSTMP) that would include a traffic control plan that would establish procedures for temporary road closures, including access to residences and businesses during construction, lane closures, signage and flagpersons, temporary detour provisions, alternative bus and delivery routes, emergency vehicle access, and alternative access locations. In addition, TR-IAMF#2 calls for a Construction Transportation Plan (CTP) that would require implementation of traffic controls during construction, such as temporary signage, identified construction routes, traffic speed limits, and flagpersons to direct traffic. The CTP would address how the contractor would carry out each phase of construction to maintain traffic flow during peak travel periods. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 656 (Carrie Sutkin, Elysian Valley Neighborhood Council, June 25, 2020)

Burbank - Los Angeles - RECORD #656 DETAIL

Status : Action Pending
Record Date : 6/25/2020
Submission Date : 6/25/2020
Interest As : Business and/or Organization
First Name : Carrie
Last Name : Sutkin

Stakeholder Comments/Issues :

656-720

Hi this is, my name is Carrie Sutkin, I live in Elysian Valley and I attended your steering committee meetings and I don't think you said that you're having a public hearing on the same night as our neighborhood council meeting. I've been inviting your staff to come and invited them to come to our land use committee meeting last night, there was a no show and I've been asked to have them come to our July 8th meeting. Can you please call me back 323-868-5383 thanks bye. Carrie Sutkin is my name, calling from Elysian Valley Neighborhood Council about your July 8th public hearing it conflicts with our land use committee meeting for the land use committee. Why did you choose this day? How are you gonna reach out to the Legion Valley residence in the neighborhood council? Okay thanks.

Response to Submission 656 (Carrie Sutkin, Elysian Valley Neighborhood Council, June 25, 2020)

656-720

The commenter requests that California High-Speed Rail Authority (Authority) staff attend a land use committee meeting for the Elysian Valley Neighborhood Council. The Authority's outreach team contacted the commenter via telephone, and the commenter, Ms. Sutkin, acknowledged there was a miscommunication and a request for a presentation was never made. An office hours appointment was scheduled to answer questions specific to Elysian Valley. The format of the public hearing was explained and noted that neighborhood council stakeholders could participate in the public hearing starting at 3:00 p.m., before the neighborhood council meeting began.

Submission 886 (Liliana Griego, Friends of the LA River (FoLAR), August 31, 2020)

Burbank - Los Angeles - RECORD #886 DETAIL

Status : Action Pending
Record Date : 9/1/2020
Submission Date : 8/31/2020
Interest As : Local Agency
First Name : Liliana
Last Name : Griego
Attachments : High Speed Rail Comment Letter - FoLARClockshop.pdf (777 kb)

Stakeholder Comments/Issues :

Dear California High-Speed Rail Authority,

Please find the attached comment letter for the High-Speed Rail Project - Burbank to Los Angeles. Feel free to reach out if you have any questions.

Best,
Liliana

[FOLAR Logo]<<http://folar.org/>>

Liliana Griego

Director of Policy, Advocacy & Engagement

570 West Avenue 26, Suite 250

Los Angeles, CA 90065

[<https://tinyurl.com/nyd89ts>][323 - 223 - 0585](tel:323-223-0585) [<https://tinyurl.com/m2svqq8>] <<mailto:liliana@folar.org>>

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[<https://tinyurl.com/lfrc8yr>]<<https://www.facebook.com/LosAngelesRiver/>>

[<https://tinyurl.com/ljrb2s3>]<<https://twitter.com/FoLARTweets>>

[<https://tinyurl.com/kj54dpp>]<<https://www.instagram.com/folarorg/>>



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323.223.0585
CONTACT@FOLAR.ORG

August 31, 2020

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

Via email to: 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,

Friends of the Los Angeles River (FoLAR) has been at the forefront of ensuring the Los Angeles River is publicly accessible and ecologically sustainable. We inspire River stewardship through community engagement, education, advocacy, and thought leadership. For over 30 years, we have worked to create an enduring vision of the River that acknowledges its legacy as a life-giving waterway and illuminates the critical benefits its restoration can bring to the surrounding communities.

Clockshop is an art organization based in Elysian Valley. Our core activity is the production of new projects and public programs. We bring this mission to our partnership with California State Parks on the [Bowtie Project](#), an underused public space along the Los Angeles River that will be the next urban state park in Los Angeles. Clockshop is the first art organization in the state to have a legal partnership with the Department of Parks and Recreation for the State of California. We have worked with the Los Angeles office of DPR for the past 6.5 years bringing arts and educational programming to the Bowtie site. We have directly experienced the need for open space that serves the surrounding park poor communities.

More recently, FoLAR and Clockshop have been advocating for 100 acres of continuous open space within the Taylor Yard area, including Río de Los Angeles State Park, Taylor Yard River Park Project, Mountains Recreation and Conservation Authority (MRCA) easement, and the future Bowtie State Park. In response to the growing momentum, the City of LA, CA State Parks, and MRCA established the 100-Acre Partnership at Taylor Yard to ensure that coordinated community driven efforts work to restore the LA River and create accessible river adjacent open space. The proposed California High-Speed Rail Project – Burbank to Los Angeles Project Section –will run through the largest natural habitat stretch along the LA River and will threaten the vision to create 100 acres of continuous open space. Due to FoLAR's and Clockshop's active role in realizing the 100 Acre Vision, we respectfully share some of our concerns.

1. Lack of acknowledgment for the 100 Acres

The 100 Acre Vision includes Río de Los Angeles State Park, Taylor Yard River Park Project, MRCA's easement, and the future Bowtie State Park. However, the report does not identify the

886-1701

LOWER RIVER OFFICE | 340 NIETO AVENUE | LONG BEACH | CA 90803

Submission 886 (Liliana Griego, Friends of the LA River (FoLAR), August 31, 2020) - Continued



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886-1701 | Bowtie as a Park. This report must acknowledge all current and future parks adjacent to the project to assess its impact adequately.

886-1702 | 2. Noise impact on the current and future use of the 100 Acres

Currently, Rio de Los Angeles State Park is the only completed park within the 100 Acres. This park hosts both active and passive recreational activities. Noise from the high-speed rail will particularly impact the passive recreational users at this park. The restored native habitat and trails where people walk, bird watch, and recreate abuts the proposed project. There have also been sightings of the endangered Least Bell's Vireo in these restored habitats that could be disturbed by the noise emitted from the passing trains.

The three other parcels that make up the 100 Acres –Taylor Yard River Park Project, MRCA's easement, and Bowtie State Park – are all slated for restoring riparian habitat, hydrologically reconnecting the River into these sites, and providing passive recreational use. Noise from the construction and train activity will impact the wildlife we strive to create habitat for and impact future park visitors' experiences during their visit. Given the inevitable impact this project will have on the ecosystem we are trying to rehabilitate, the California High-Speed Rail Authority should fund future river restoration efforts adjacent to this stretch.

Sound mitigation should provide creative solutions that decrease noise impacts and do not impair the visual aspect of the 100 Acres. Although a sound wall would reduce noise levels, it will create a visual separation within the 100 Acres. Many have a vision to create 100 continuous acres of open space and building a wall will sever the area's connectivity. We hope the California High-Speed Rail Authority presents novel solutions to ensure that the sound and lack of connectivity do not disturb the wildlife and visitors of the 100 Acres.

886-1703 | 3. Adequate public access to the full 100 Acres

The 100 Acre Vision offers a unique opportunity to provide the largest stretch of open space along the LA River. Given that this project is proposing to build a major piece of infrastructure in the middle of it, the California High-Speed Rail Authority must present creative solutions to ensure that the 100 Acre vision is not at risk. The project must ensure equitable public access to the 100 Acres and not impede any opportunity for regional open space improvements. One solution may include overpasses or underpasses that provide all visitors unrestricted access to enjoy the 100 Acres.

886-1704 | 4. Lack of inclusion of current and future plans for the LA River

This report fails to mention or include LA River plans such as the recently completed Upper Los Angeles River and Tributaries Revitalization Plan, the soon to be released Los Angeles River Master Plan Update, and the future plans for the 100 Acre Partnership at Taylor Yard. Although some of these plans are not completed, they should still be recognized within this

886-1704 | report, as there are several opportunity areas that have been identified for future projects. The high-speed rail should not prevent stakeholders from implementing these improvements.


886-1705 | One example where the high-speed rail could impede a future project is the proposed alignment behind the Metrolink CMF. The 100 Acre Partnership at Taylor Yard was recently awarded \$10M to design and create a greenway at the River's edge called Paseo del Rio. The first round of funding supports the construction of this greenway within the Taylor Yard area. However, several planning documents identify the opportunity to extend this greenway and connect it down to the confluence of the Arroyo Seco. The proposed alignment between the Metrolink CMF and the River would preclude this greenway from expanding, thus eliminating the opportunity for the River to serve as a connectivity corridor with greenways lining both banks. If the high-speed rail aligns with the existing rail corridor east of the Metrolink CMF, it would allow this project or other future opportunities for multi-modal paths of connectivity along the River to proceed.

886-1706 | 5. Limit impact on the adjacent communities


The high-speed rail project should work directly with local community members to ensure a transparent process and limit adverse effects on the neighboring communities. This project should also protect adjacent communities impacted by development and consult groups like the Los Angeles Regional Open Space and Housing (LAROSAH) Collaborative to prevent gentrification and displacement.

886-1707 | Given our concerns, we encourage the Authority to consider innovative solutions that address these issues or to relocate the route outside of the area proposed for revitalization. The High-Speed Rail will undoubtedly disrupt the vision for connectivity, access, and naturalization along the river corridor. We hope as you move forward with this project that you take these concerns into serious consideration and ensure that this project does not preclude future generations from obtaining not only a world-renown park, but also a world-renown river. Please feel free to reach out if you have any questions.

Sincerely,



Liliana Griego
Director of Policy, Advocacy & Engagement
Friends of the LA River



Submission 886 (Liliana Griego, Friends of the LA River (FoLAR), August 31, 2020) - Continued



570 W. AVE 26 #250
LOS ANGELES
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Julia Meltzer

Director

Clockshop

LOWER RIVER OFFICE | 340 NIETO AVENUE | LONG BEACH | CA 90803

Response to Submission 886 (Liliana Griego, Friends of the LA River (FoLAR), August 31, 2020)

886-1701

The commenter requests the Taylor Yard G1 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, also known and referred to as 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.

886-1702

The commenter requests that the Authority consider creative solutions that decrease noise impacts and do not impair the visual aspect of the 100 Acres. The Authority acknowledges this request and since publication of the Draft EIR/EIS has met with the public agencies involved in the 100-Acre Partnership as well as the Friends of the Los Angeles River to address noise and other concerns. Currently, there is no proposed mitigation, including a sound barrier, at this location due to the finding of no severe impacts.

886-1703

The commenter expresses concern regarding equitable public access and opportunities for regional open space improvements, specifically in the 100-Acre Partnership area along the Los Angeles River. In response to the first part of the comment which states “that this project is proposing to build a major piece of infrastructure in the middle of it”, it should be noted that the HSR project would build new infrastructure within an existing railroad corridor that already goes through the middle of the 100-Acre Partnership area. As discussed in Section 3.15.7 of this Final EIR/EIS, Mitigation Measure PR-MM#1 would mitigate potential impacts related to temporary access during construction by requiring the contractor to prepare a technical memorandum documenting how connections to the unaffected trail portions and nearby roadways will be maintained during construction. PR-MM#2 would require the contractor to prepare a technical memorandum documenting how the contractor will ensure that connections to the unaffected park portions or nearby roadways will be maintained after construction. Lastly, Section 3.15.3 of this Final EIR/EIS has been revised to address the HSR Project’s consistency with the LARRMP Taylor Yard Opportunity Area, which discusses an emphasis to be placed on green connections between the east and west banks of the Los Angeles River and to parks and neighborhoods. With 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 Authority would coordinate with the authorities with jurisdiction on impacts to existing and planned bicycle routes and would ensure access is maintained for parks and recreational resources during and after construction of the HSR Build Alternative.

Response to Submission 886 (Liliana Griego, Friends of the LA River (FoLAR), August 31, 2020) - Continued

886-1704

The commenter requests that several projects related to the Los Angeles River be included in Section 3.19, Cumulative Impacts. The cumulative impacts section presents an analysis of the cumulative effects of implementing the HSR Build Alternative, which, in combination with other past, present, and reasonably foreseeable future projects, may result in cumulative environmental impacts. For the purposes of the Draft EIR/EIS analysis, “reasonably foreseeable future projects” are those likely to occur within the 2040 planning horizon for the HSR Project, including adjacent HSR project sections. As the commenter points out, not all the projects mentioned in the comment are completed, nor do they have publicly available environmental or project documents yet. Therefore, at the time that project studies for the Draft EIR/EIS were initiated in 2015, only certain projects were considered reasonably foreseeable. However, since publication of the Draft EIR/EIS in May 2020, updates have been made for some projects based upon information provided in public comments on the Draft EIR/EIS.

As stated in Section 3.19.8.8, it should be noted 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 EIS/EIR (U.S. Army Corps of Engineers 2015). While there would be some geographical overlap between the HSR Build Alternative and the Los Angeles River Ecosystem Restoration Project, specifically at Taylor Yard and the Bowtie Parcel, the HSR Build Alternative would not preclude or conflict with the restoration activities planned for the Los Angeles River. The project list in Section 3.19 of this Final EIR/EIS has been revised.

886-1705

The commenter states that the HSR Build Alternative would preclude the greenway within the Taylor Yard area from expanding, thus eliminating the opportunity for the Los Angeles River to serve as a connectivity corridor with greenways lining both banks. Section 3.15 of this Final EIR/EIS has been revised to include a discussion of the G1 Parcel (Bowtie Parcel) and the Paseo del Rio which is a proposed greenway between the G1 Parcel and G2 Parcel, as noted in the comment. The HSR Build Alternative footprint would also be located within the existing rail right-of-way, as suggested by the commenter. While the alignment would include the existing CMF area, the permanent impacts are still east of the planned extension of the Los Angeles River Bike Path (refer to Figure 3.15-2, Sheet 5 of 6). In addition, the commenter states future connections to Arroyo Seco are also proposed. As shown in Figure 3.15-2, the proposed extension of the Los Angeles River Bike Path is shown with multiple alignments that may occur along the Taylor Yard Area and extend approximately 8 miles to downtown. As described in Impact PK#3, the HSR Build Alternative may require permanent easements along the planned extension of the Los Angeles River Bike Path. The affected portions of the planned extension of the bike path appear to be minor in size in relation to the entire extension of the bike path, although exact acreages of impact were not generated because of the multiple alignment options for the path. Therefore, Mitigation Measure PR-MM#4 is provided conservatively depending on the final design of the planned resource. As connectivity between Rio de Los Angeles State Park and Taylor Yard is also 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 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

Response to Submission 886 (Liliana Griego, Friends of the LA River (FoLAR), August 31, 2020) - Continued

886-1705

connectivity. Therefore, through this mitigation measure the HSR Build Alternative is consistent overall with the applicable local plans, goals, and policies.

886-1706

The comment states that the Authority should work directly with local community members to ensure a transparent process and limit adverse effects on the neighboring communities. The commenter also asks that the project protect adjacent communities impacted by development and consult groups like the Los Angeles Regional Open Space and Housing (LAROSAH) Collaborative to prevent gentrification and displacement.

To understand the potential impacts, there has been an extensive public and agency outreach program to provide opportunities for public involvement throughout the EIR/EIS process. For minority/low-income identifying communities, EJ-related meetings were held with the appropriate local officials; public, local and regional organizations; and government agencies, as well as with representatives from affected communities, as shown in Table 5-8, Burbank to Los Angeles Project Section Environmental Justice Targeted Outreach Activity (August 2015–December 2018), in Chapter 5, Environmental Justice. The Authority's outreach efforts are ongoing, and outreach to minority and low-income populations will continue throughout the HSR Project. Chapter 9, Public and Agency Involvement, includes detailed information on the numerous opportunities for participation that have taken place. The purpose of these efforts was to gain the input of minority and low-income populations regarding the project and to obtain their comments as part of the public record. Therefore, the analyses and conclusions in this EIR/EIS accurately reflect the setting and potential impacts of the project in those communities.

886-1707

This comment is a closing statement that provides a summary of the comments provided. Refer to responses to comments 886-1701 through 886-1706, contained in this chapter of this Final EIR/EIS, for detailed responses to those comments. The Authority will continue to coordinate with the Friends of the LA River as the project continues.

Submission 622 (Helene Schpak, Glassell Park Improvement Association, June 2, 2020)

Burbank - Los Angeles - RECORD #622 DETAIL

Status : Action Pending
Record Date : 6/2/2020
Submission Date : 6/2/2020
Interest As : Business and/or Organization
First Name : Helene
Last Name : Schpak

Stakeholder Comments/Issues :

622-639 | Hi I'm the President of the Glassell Park Improvement Association, and I would like a hard copy of the draft EIR sent to me. My name is Helene and h-e-l-e-n-e, s-c-h-p-a-k is the last name and my address is 3769 Aguilar Street A-g-u-i-l-a-r Street LA 90065 and my phone number is 323-422-1330. Thanks.

Response to Submission 622 (Helene Schpak, Glassell Park Improvement Association, June 2, 2020)

622-639

The commenter requested a copy of the Draft EIR/EIS. On June 2, 2020, the commenter was directed to the online version of the Draft EIR/EIS document that is available on the Authority's website. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 630 (Christian Sookiasian, gotprint.com, June 8, 2020)

Burbank - Los Angeles - RECORD #630 DETAIL

Status : Action Pending
Record Date : 6/8/2020
Submission Date : 6/8/2020
Interest As : Business and/or Organization
First Name : Christian
Last Name : Sookiasian

Stakeholder Comments/Issues :

Hi,

630-714 | The EIR/EIS Draft for the Burbank to Los Angeles Project Section is not available for electronic download on this page: [https://hsr.ca.gov/programs/environmental/eis_eir/draft_burbank_los_angeles.aspx | https://hsr.ca.gov/programs/environmental/eis_eir/draft_burbank_los_angeles.aspx]
If it is on another page it is certainly not easy to find.

Please send me an electronic copy of the full draft ASAP.

Thank you,

Christian Sookiasian | Risk Strategist

o: (818) 252-3000 ext. 347 | e: [<mailto:Christian@GotPrint.com> | Christian@GotPrint.com] | w: [

<https://goo.gl/FkeDs7> | www.GotPrint.com]

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Response to Submission 630 (Christian Sookiasian, gotprint.com, June 8, 2020)

630-714

The commenter requested clarification as to the location of the online version of the Draft EIR/EIS. On June 9, 2020, the commenter was directed to the online version of the EIR/EIS document that is available on the Authority's website. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 803 (Historical Society of Southern California, Historical Society of Southern California, August 12, 2020)

Burbank - Los Angeles - RECORD #803 DETAIL

Status : No Action Required
Record Date : 8/12/2020
Submission Date : 8/12/2020
Interest As : Business and/or Organization
First Name : Historical
Last Name : Society of Southern California

Stakeholder Comments/Issues :

803-1441

Our organization does not comment on these projects. Please remove us from your list.
Thank you.

--

Historical Society of Southern California
PO Box 50019
Long Beach, CA 90815
323-222-0546
hssc@thehssc.org
thehssc.org
@thehssc

Response to Submission 803 (Historical Society of Southern California, Historical Society of Southern California, August 12, 2020)

803-1441

The comment states that the Society of Southern California does not provide comments on these projects and requests that they be removed from the distribution list. The Authority has acknowledged this request, and the project's distribution list will be updated accordingly.

Submission 874 (Kyle Kawakami, Irell & Manella, LLP, August 31, 2020)

874-1615

Burbank - Los Angeles - RECORD #874 DETAIL

Status : Action Pending
Record Date : 8/31/2020
Submission Date : 8/31/2020
Interest As : Business and/or Organization
First Name : Kyle
Last Name : Kawakami
Attachments : Glendale Operable Unit Well and Pipeline Locations.pdf (770 kb)
 Glendale Operable Unit Monitoring Locations on Goodwin Ave.pdf (270 kb)

Stakeholder Comments/Issues :

California High Speed Rail Authority:

I represent a group of potentially responsible parties (the "PRPs") in United States of America and the State of California v. ITT LLC, et. al., Case No. CV 99-005522 (the "Case") in the United States District Court for the Central District of California (Western Division) (the "Court"). In 2000, the Court entered a consent decree (such consent decree, as modified, the "Consent Decree") in the Case addressing the claims of plaintiffs United States of America and the State of California, on behalf of the California Department of Toxic Substances Control. Pursuant to the requirements of the Consent Decree, an interim remedy in the Glendale North and South Operable Units (collectively the "GOU") of the San Fernando Valley Superfund Site is currently ongoing. The interim remedy consists of groundwater extraction wells, groundwater monitoring wells, treatment of volatile organic compounds by air stripping and liquid-phase granular activated carbon, and conveyance to the City of Glendale Grandview Reservoir for blending prior to discharge to the municipal distribution system.

The remedy allows for beneficial use of groundwater by the residents of the eastern San Fernando Valley, specifically those within the service area of the Glendale Department of Water and Power (the "GWP"), who utilize the treated groundwater for potable supply. The extraction wells were installed in specific locations to improve the water quality and control the movement of the impacted water.

The PRPs have reviewed the Draft Environmental Impact Report/Environmental Impact Statement (the "Draft EIR/EIS") made available by the California High Speed Rail Authority for the Burbank to Los Angeles Project Section of the California High-Speed Rail Project (the "Proposed Rail Project"), and it appears that the Proposed Rail Project could impact the remedy required by the Consent Decree. Specifically, the Proposed Rail Project appears to potentially impact and impede access to wells GS-3 and GS-4, both of which are currently in use and are required to remain in use and accessible by the United States Environmental Protection Agency (the "US EPA") and the California Department of Toxic Substances Control pursuant to the Consent Decree. It does not appear that the interim remedy, including maintaining access to and the operation of these wells, required by the Consent Decree was considered in connection with the development of the Proposed Rail Project.

The residents of Glendale, the GWP, the US EPA, and the PRPs have collaborated for more than two decades to ensure that the environmental and economic benefits of restoring the aquifer and delivering clean potable water are achieved. The Draft EIR/EIS does not acknowledge the potential for the Proposed Rail Project to impede progress toward this goal. While the PRPs do not oppose the Proposed Rail Project itself, the PRPs object to the Draft EIR/EIS to the extent it does not consider mitigation measures for protecting monitoring

wells, extraction wells, conveyance piping, and other supporting utilities and equipment.

Attached to this email are plans for the interim remedy showing the locations of wells GS-3 and GS-4, the pipeline alignment along Goodwin Avenue, and the locations of the monitoring wells along Goodwin Avenue, all of which may be impacted by the Proposed Rail Project.

Please confirm receipt of this email.

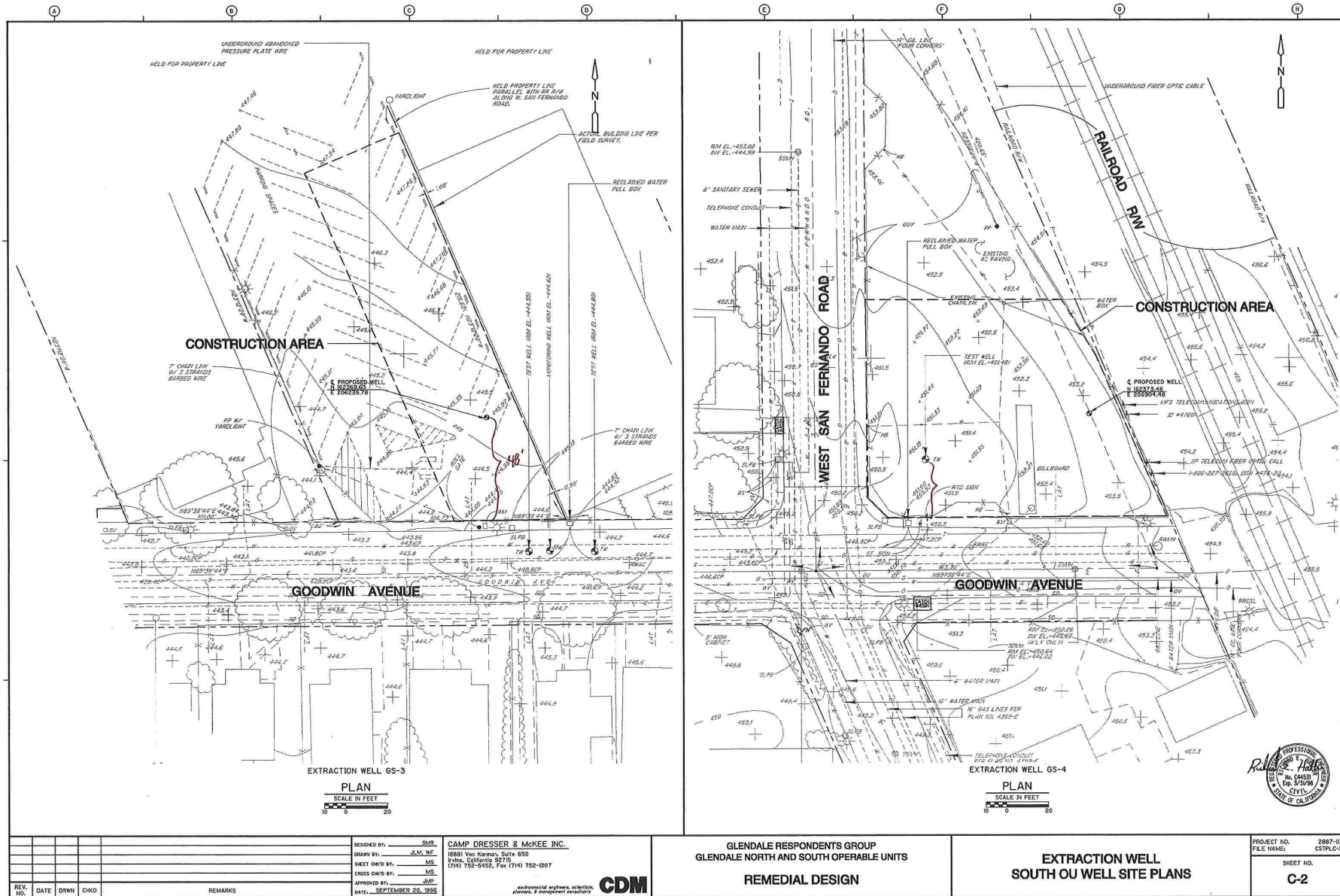
Kyle S. Kawakami
 Irell & Manella, LLP
 840 Newport Center Drive
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 Newport Beach, CA 92660-6324
 E-mail: KKawakami@irell.com<mailto:KKawakami@irell.com>

Attorney for the PRPs under the Consent Decree

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874-1615

Submission 874 (Kyle Kawakami, Irell & Manella, LLP, August 31, 2020) - Continued



REV. NO.	DATE	DRWN	CHKD	REMARKS

DESIGNED BY: SMR
 DRAWN BY: JLM, MF
 CHECKED BY: MS
 CROSS CHECKED BY: MS
 APPROVED BY: JMF
 DATE: SEPTEMBER 20, 2018

CAMP DRESSER & MCKEE INC.
 18881 Von Karman, Suite 650
 Irvine, California 92719
 (714) 752-9452, Fax (714) 752-1897

CDM
environmental engineering, architecture, planning, & management consultants

GLENDALE RESPONDENTS GROUP
GLENDALE NORTH AND SOUTH OPERABLE UNITS
REMEDIAL DESIGN

EXTRACTION WELL SOUTH OU WELL SITE PLANS

PROJECT NO. 2887-10
 FILE NAME: CSTPL-C-2

SHEET NO. **C-2**

Submission 874 (Kyle Kawakami, Irell & Manella, LLP, August 31, 2020) - Continued



Response to Submission 874 (Kyle Kawakami, Irell & Manella, LLP, August 31, 2020)

874-1615

The commenter states that the HSR Build Alternative appears to potentially impact and impede access to monitoring wells GS-3 and GS-4 which provide monitoring of the San Fernando Groundwater Basin Superfund site.

As design progresses, the Authority would coordinate with the U.S. Environmental Protection Agency (USEPA), the State Water Resources Board, the California Department of Toxic Substances Control, and the California Department of Health Services, Division of Drinking Water, to avoid impacts to wells and conveyance infrastructure necessary to implement the cleanup of impaired groundwater in the Superfund site.

As required under CERCLA, the Authority would coordinate the relocation of these wells with the USEPA. The relocated extraction wells would be installed and functional prior to the removal of the existing wells so that there would be no effect to the ongoing remediation program for the Superfund site. Clarifying text regarding the Superfund site and the extraction wells has been added to Impact HMW #3 in Section 3.10.6.3 of this Final EIR/EIS.

The following text has been added to Section 3.8, Impact HWR #6: Permanent Impacts on Groundwater Volume, Quality, and Recharge during Construction: "Additionally, the Authority will consult with the Upper Los Angeles River Area Watermaster to describe the disturbance related to the project footprint within the Upper Los Angeles River Area 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. At the time of the consultation, the Authority will 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 Upper Los Angeles River Area Watermaster and any Administrative Committee representatives.

Submission 876 (Kyle S. Kawakami, Irell & Manella, LLP, August 31, 2020)

876-1623

Burbank - Los Angeles - RECORD #876 DETAIL	
Status :	Action Pending
Record Date :	8/31/2020
Submission Date :	8/31/2020
Interest As :	Business and/or Organization
First Name :	Kyle S.
Last Name :	Kawakami
Attachments :	GlendaleOperableUnitMonitoringLocationsonGoodwinAve.pdf (270 kb) GlendaleOperableUnitWellandPipelineLocations.pdf (770 kb)

Stakeholder Comments/Issues :

This message was submitted to Burbank_Los.Angeles@hsr.ca.gov on 8/31. I have not yet received confirmation of e-mail receipt so am also submitting via the comment form.

California High Speed Rail Authority:

I represent a group of potentially responsible parties (the "PRPs") in United States of America and the State of California v. ITT LLC, et. al., Case No. CV 99-005522 (the "Case") in the United States District Court for the Central District of California (Western Division) (the "Court"). In 2000, the Court entered a consent decree (such consent decree, as modified, the "Consent Decree") in the Case addressing the claims of plaintiffs United States of America and the State of California, on behalf of the California Department of Toxic Substances Control. Pursuant to the requirements of the Consent Decree, an interim remedy in the Glendale North and South Operable Units (collectively the "GOU") of the San Fernando Valley Superfund Site is currently ongoing. The interim remedy consists of groundwater extraction wells, groundwater monitoring wells, treatment of volatile organic compounds by air stripping and liquid-phase granular activated carbon, and conveyance to the City of Glendale Grandview Reservoir for blending prior to discharge to the municipal distribution system.

The remedy allows for beneficial use of groundwater by the residents of the eastern San Fernando Valley, specifically those within the service area of the Glendale Department of Water and Power (the "GWP"), who utilize the treated groundwater for potable supply. The extraction wells were installed in specific locations to improve the water quality and control the movement of the impacted water.

The PRPs have reviewed the Draft Environmental Impact Report/Environmental Impact Statement (the "Draft EIR/EIS") made available by the California High Speed Rail Authority for the Burbank to Los Angeles Project Section of the California High-Speed Rail Project (the "Proposed Rail Project"), and it appears that the Proposed Rail Project could impact the remedy required by the Consent Decree. Specifically, the Proposed Rail Project appears to potentially impact and impede access to wells GS-3 and GS-4, both of which are currently in use and are required to remain in use and accessible by the United States Environmental Protection Agency (the "US EPA") and the California Department of Toxic Substances Control pursuant to the Consent Decree. It does not appear that the interim remedy, including maintaining access to and the operation of these wells, required by the Consent Decree was considered in connection with the development of the Proposed Rail Project.

The residents of Glendale, the GWP, the US EPA, and the PRPs have collaborated for more than two decades to ensure that the environmental and economic benefits of restoring the aquifer and delivering clean potable

water are achieved. The Draft EIR/EIS does not acknowledge the potential for the Proposed Rail Project to impede progress toward this goal. While the PRPs do not oppose the Proposed Rail Project itself, the PRPs object to the Draft EIR/EIS to the extent it does not consider mitigation measures for protecting monitoring wells, extraction wells, conveyance piping, and other supporting utilities and equipment.

Attached to this email are plans for the interim remedy showing the locations of wells GS-3 and GS-4, the pipeline alignment along Goodwin Avenue, and the locations of the monitoring wells along Goodwin Avenue, all of which may be impacted by the Proposed Rail Project.

Please confirm receipt of this email.

Kyle S. Kawakami
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Suite 400
Newport Beach, CA 92660-6324
E-mail: KKawakami@irell.com

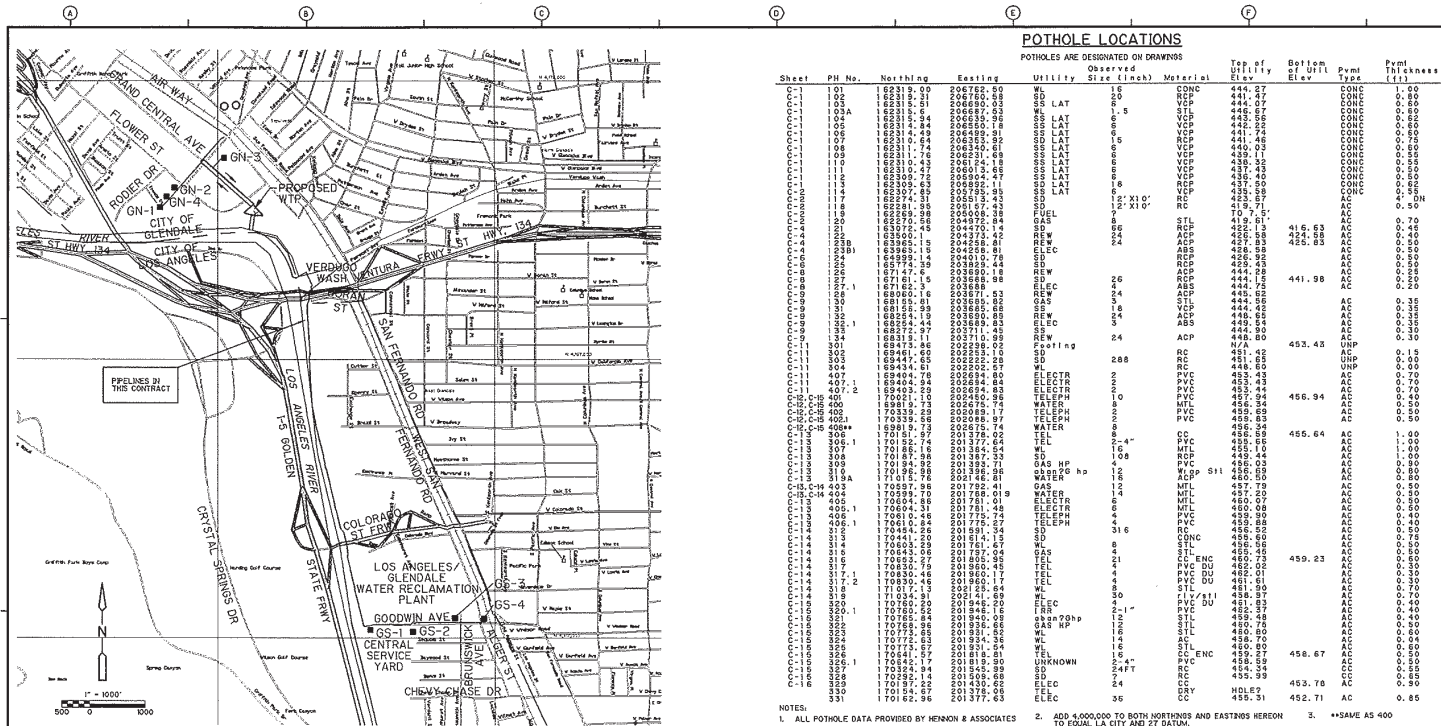
Attorney for the PRPs under the Consent Decree

876-1623

Submission 876 (Kyle S. Kawakami, Irell & Manella, LLP, August 31, 2020) - Continued



Submission 876 (Kyle S. Kawakami, Irell & Manella, LLP, August 31, 2020) - Continued

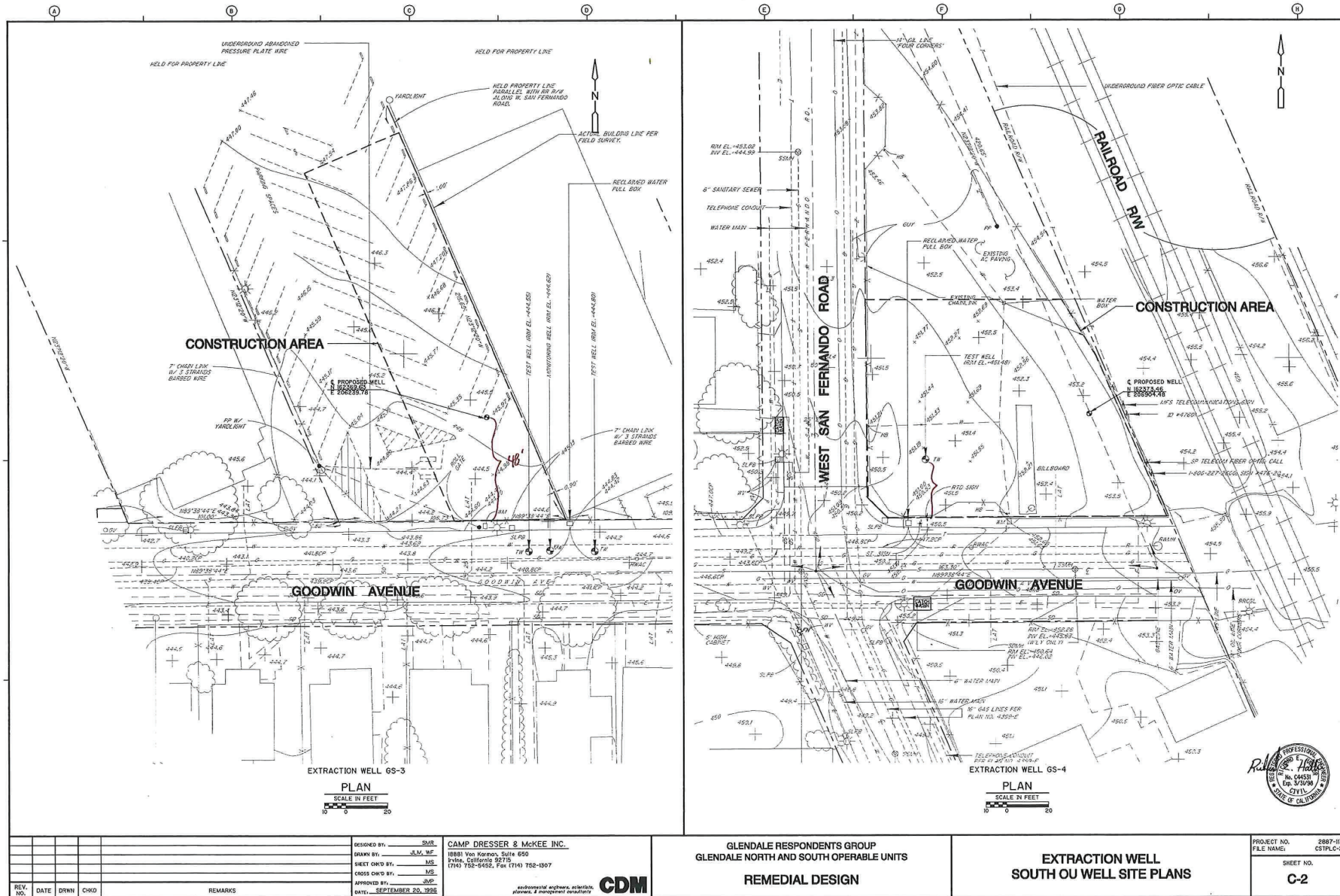


POT HOLE LOCATIONS

POT HOLES ARE DESIGNATED ON DRAWINGS

Sheet	PH No.	Northing	Easting	Utility	Size (Inch)	Material	Top of Utility Elev.	Bottom of Utility Elev.	Pvt Thick	Pvt Thickness
C-1	101	162315.00	206762.80	WL	16	CONC	444.27			1.00
C-1	102	162315.01	206760.88	SS	LAT	8	CONC	441.47		0.80
C-1	103	162315.02	206760.88	SS	LAT	8	CONC	444.07		0.80
C-1	103A	162315.06	206687.92	WL	6	STB	446.67			0.80
C-1	105	162315.48	206850.91	VCP	6	VCP	442.95			0.80
C-1	106	162315.49	206850.91	VCP	6	VCP	441.74			0.80
C-1	107	162315.49	206830.01	VCP	6	VCP	440.03			0.80
C-1	108	162315.49	206830.01	VCP	6	VCP	439.35			0.80
C-1	109	162315.49	206830.01	VCP	6	VCP	437.43			0.80
C-1	110	162315.49	206830.01	VCP	6	VCP	436.40			0.80
C-1	111	162315.49	206830.01	VCP	6	VCP	435.39			0.80
C-1	112	162315.49	206830.01	VCP	6	VCP	434.38			0.80
C-1	113	162315.49	206830.01	VCP	6	VCP	433.37			0.80
C-1	114	162315.49	206830.01	VCP	6	VCP	432.36			0.80
C-1	115	162315.49	206830.01	VCP	6	VCP	431.35			0.80
C-1	116	162315.49	206830.01	VCP	6	VCP	430.34			0.80
C-1	117	162315.49	206830.01	VCP	6	VCP	429.33			0.80
C-1	118	162315.49	206830.01	VCP	6	VCP	428.32			0.80
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Submission 876 (Kyle S. Kawakami, Irell & Manella, LLP, August 31, 2020) - Continued



REV. NO.	DATE	DRWN	CHKD	REMARKS

DESIGNED BY: SMR
 DRAWN BY: JLM, MF
 CHECKED BY: MS
 APPROVED BY: JMF
 DATE: SEPTEMBER 20, 1988

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 Irvine, California 92719
 (714) 752-9452, Fax (714) 752-1897

CDM
 environmental engineers, scientists,
 planners, & management consultants

**GLENDALE RESPONDENTS GROUP
 GLENDALE NORTH AND SOUTH OPERABLE UNITS
 REMEDIAL DESIGN**

**EXTRACTION WELL
 SOUTH OU WELL SITE PLANS**

PROJECT NO. 2887-10
 FILE NAME: CSTPL-C-2
 SHEET NO. **C-2**

Response to Submission 876 (Kyle S. Kawakami, Irell & Manella, LLP, August 31, 2020)

876-1623

Refer to response to comment 874-1615.

Submission 865 (Michael Faye, Kombucha Dog, August 28, 2020)

Burbank - Los Angeles - RECORD #865 DETAIL

Status : Completed
Record Date : 8/28/2020
Submission Date : 8/28/2020
Interest As : Business and/or Organization
First Name : Michael
Last Name : Faye

Stakeholder Comments/Issues :

865-1580

Yeah hi, I have a property in Downtown Los Angeles and we're worried that it's part of the High-Speed rail project. We're trying to find out information if our land is going to be taken over, or what that process is, or what's going to happen? If you could direct me to the right person to talk to, or if that's you that's great. My name is Michael Faye, F-A-Y-E, and my number is 213-700-7011. Thank you.

Response to Submission 865 (Michael Faye, Kombucha Dog, August 28, 2020)

865-1580

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

The commenter expresses concern about the HSR Project's impacts on their property and is seeking additional information on the property acquisition process.

Refer to Appendix 3.12-D, Property Acquisitions and Easements, for a detailed map showing expected property acquisitions and easements required.

The Authority understands that the proposed construction of the HSR system would affect private property owners. In light of this fact, the Authority has committed to educate, inform, and work collaboratively with affected property owners. Please refer to the Authority's website for additional resources for affected property owners:
https://hsr.ca.gov/programs/private_property/

Property owners who believe they have suffered a loss may file a claim with the State of California Government Claims Board. More information may be obtained online at <https://www.dgs.ca.gov/ORIM/Services/Page-Content/Office-of-Risk-and-Insurance-Management-Services-List-Folder/File-a-Government-Claim>

Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020)



Burbank - Los Angeles - RECORD #897 DETAIL

Status : Action Pending
Record Date : 9/3/2020
Submission Date : 8/31/2020
Interest As : Business and/or Organization
First Name : H. Tracey
Last Name : Brownfield
Attachments : 2020-08-31_HSR Burbank to LA Comment letter_Land Veritas_Final.pdf (6 mb)

Land Veritas Corp.
1001 Bridgeway, Suite 246
Sausalito, CA 94969

Stakeholder Comments/Issues :

Dear California High-Speed Rail Authority Representative,

August 31, 2020

Please find attached a comment letter on the California High Speed Rail Burbank to Los Angeles Draft EIR/EIS from Land Veritas.

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

Thank you,
Marlene

Subject: Draft EIR/EIS for the Burbank to Los Angeles Project Section

--

Dear High-Speed Rail Authority:

MARLENE TYNER-VALENCOURT, MESM |? ?Conservation Project Manager |? ?d: 858.682.2699 <(858)%20682-2699> | o: 858.842.1800 x 2210 <(858)%20842-1800> |? ?c: 248.499.0805 <(248)%20499-0805> |? ?tyner-valencourt@wra-ca.com WRA, Inc. |? ?www.wra-ca.com |? ?3033 5th Avenue, Suite 315, San Diego, CA 92103 |? ?San Rafael |? ?Emeryville |? ?Petaluma | Fort Bragg |? ?Denver *Our San Diego office has moved! Please note our new address.*

Thank you for the opportunity to provide comments on the joint Draft Environmental Impact Report (EIR) and Environmental Impact Statement (EIS) published for the California High Speed Rail (HSR) Burbank to Los Angeles section.

Land Veritas Corp. is the Bank Sponsor of the Petersen Ranch Mitigation Bank, located in Los Angeles County and the Soquel Canyon Mitigation Bank, located in San Bernardino and Orange Counties. The Banks were approved in 2016 and 2014 respectively by the Regional Water Quality Control Board (RWQCB), United States Army Corps of Engineers (USACE), the United States Environmental Protection Agency (EPA), and the California Department of Fish and Wildlife (CDFW) to sell mitigation credits for impacts to protected resources. The Banks include over 4,400 acres of natural habitats, the regular management and maintenance of which is funded through a non-wasting endowment. Importantly, each of these Banks' Service Areas, defining the area in which the Banks can sell credits, cover the region through which the HSR Burbank to Los Angeles section is aligned.

The Banks sell credits which can be used to offset impacts regulated by Sections 401 and 404 of the Clean Water Act, Section 1602 of the California Fish and Game Code, the Porter Cologne Water Quality Act, the California Endangered Species Act (CESA) and the California Environmental Quality Act (CEQA). The Banks' credits include aquatic resources such as seasonal wetlands, ephemeral streams, intermittent streams, perennial streams, alluvial floodplains, and riparian habitats, Swainson's hawk foraging credits, and covered habitats such as riparian forests, coast live oak woodlands, walnut woodlands, coastal sage scrub, valley and foothill grasslands, native grasslands, and mixed chaparral communities. Nearly all 4,100 acres of the Petersen Ranch Bank Property are credited for Swainson's hawk foraging habitat, and actively foraging Swainson's hawks have been observed onsite.

Both Banks are located within important wildlife migratory corridors, and while they have already been credited for the resources listed above, they are also suitable habitat for several other special status plant and animal species that HSR could potentially impact. Wildlife species potentially impacted by HSR and

Land Veritas Corp 1001 Bridgeway, Suite 246, Sausalito CA 94965 p 415.729.3733

Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued



observed at the Banks include but are not limited to Blainville’s horned lizard, red-diamond rattlesnake, western pond turtle, loggerhead shrike, burrowing owl, northern harrier, Crotch’s bumblebee, vernal pool fairy shrimp, tricolored blackbird and several special status plant species.

Approximately 2,500 acres of the Bank Properties are not yet under conservation easement. Mitigation projects can therefore be planned and implemented on unencumbered portions to match specific project impacts, including the possible translocation of impacted special-status plant species such as Joshua trees.

More information on both Banks, including credits offered and service area maps, are presented in Appendix A.

897-1762

Land Veritas has reviewed the HSR Burbank to Los Angeles Section DEIR/DEIS and supports this project as an important piece of infrastructure for the region. We respectfully present the following comment on the adequacy of the DEIR specific to Biology Mitigation Measure #47 (BIO-MM#47) included therein:

897-1763

Prepare and Implement a Compensatory Mitigation Plan (CMP) for Impacts to Aquatic Resources (BIO-MM#47): The CMP defined in BIO-MM#47 identifies several methods to provide mitigation for impacts to aquatic resources, including purchasing mitigation credits from an agency-approved mitigation bank. Both the joint USACE and EPA 2008 Mitigation Rule (33 C.F.R. 325 and 332, 40 C.F.R. 230) and the state wetland policy for California (California State Water Resource Control Board, 2019) specify a preference for purchasing credits from approved mitigation banks over other forms of compensatory mitigation. This preference was established because mitigation banks avoid temporal loss of function to impacted resources, must be managed and funded in perpetuity, are protected via permanent conservation easements, and are subject to a high degree of regulatory oversight relative to other mitigation options. Accordingly, for the CMP defined in BIO-MM#47 to be consistent with state and federal guidance, it should include a preference for the purchase of mitigation credits over other forms of compensatory mitigation. Not only with this provide consistency with these policies, it also ensures that impacts due to temporal loss are mitigated to “less than significant”.

We thank you for the opportunity to provide comments on this project and hope you consider the Petersen Ranch and Soquel Canyon Mitigation Banks as future partners, as we can provide compensatory mitigation that achieves regulatory compliance while providing superior environmental outcomes.

Sincerely,

H. Tracey Brownfield
President, Land Veritas Corp.
tracey@landveritas.com
P: 415.729.3733

References

California State Water Resources Control Board. 2019. State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State. Online: https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/procedures_conformed.pdf

Department of the Army, Corps of Engineers. 2008. Compensatory Mitigation for Losses of Aquatic Resources; Final Rule. Department of Defense 33 C.F.R. 325 and 332. Online: https://www.sac.usace.army.mil/Portals/43/docs/regulatory/Final_Mitigation_Rule.pdf

Environmental Protection Agency. 2008. Compensatory Mitigation for Losses of Aquatic Resources; Final Rule. EPA 40 C.F.R. 230. Online: https://www.sac.usace.army.mil/Portals/43/docs/regulatory/Final_Mitigation_Rule.pdf

Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued



LAND VERITAS MITIGATION BANKS:
PETERSEN RANCH AND SOQUEL CANYON



Appendix A

Bank Sponsor:
Land Veritas Corp
Contact: Tracey Brownfield
tracey@landveritas.com

Permitting & Marketing Consultant:
WRA, Inc.
Contact: Nate Bello
bello@wra-ca.com

Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued



Executive Summary

The purpose of this package is to introduce two mitigation banks—Petersen Ranch and Soquel Canyon—providing mitigation credits within Southern California. This document includes descriptions of each Bank, explanations of their various credits, a review of how each credit type is generated, and maps detailing service areas. Each Bank has been approved by the U.S. Army Corps of Engineers (USACE), U.S. Environmental Protection Agency (USEPA), California Department of Fish and Wildlife (CDFW), Santa Ana Regional Water Quality Control Board (Soquel Canyon), and Lahontan Regional Water Quality Control Board (Petersen Ranch). They are both located in southern California and are permitted to sell credits across portions of Los Angeles, Ventura, Kern, San Bernardino, Orange, and Riverside Counties.

Land Veritas Corp (LV), a Women-Owned Business Entity, is the sponsor of both Petersen Ranch and Soquel Canyon Mitigation Banks.

Petersen Ranch was approved by its Interagency Review Team (IRT) in 2016 and is being implemented in six different phases. The first phase was implemented in 2016 and included two portions of the Property (Areas A and E). This first phase is expected to generate over 1,150 various mitigation credits over the course of the next several years which can be used to mitigate for a range of impacts to aquatic features and terrestrial habitats. Four other portions of the Bank (Areas B, C, D, and F) have been approved, but not implemented yet. As such, their development plans—the restoration actions taken and the habitats or aquatic features targeted—can be altered with IRT approval to create specific mitigation credits for client needs. These Areas can be utilized to institute large scale restoration projects to meet project specific mitigation needs.

Soquel Canyon was approved by its IRT in 2014, and has received four of its six credit releases to date. Located adjacent to the northern boundary of Chino Hills State Park, Soquel Canyon protects or otherwise improves nearly 80,000 linear feet of ephemeral, intermittent, and perennial streams and their associated riparian habitats. To date, the bank has generated over 165 credits for a diverse array of stream systems, riparian buffers, and various terrestrial habitats. An additional 140 credits are planned to be generated through future credit releases.

List of Figures

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- Figure 1: Bank Location
- Figure 2: Bank Property, Petersen Ranch
- Figure 3: Bank Property, Elizabeth Lake
- Figure 4: 404 Service Area
- Figure 5: Lahontan RWQCB (PC Credits) Service Area
- Figure 6: CESA Service Area
- Figure 7: CEQA Service Area
- Figure 8: 1600 Service Area

Part 2: Soquel Canyon Mitigation Bank

- Figure 1: Bank Location
- Figure 2: Bank Property
- Figure 3: 404/401 Service Area
- Figure 4: CEQA Service Area
- Figure 5: 1600 Service Area

Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued



Contact
 Phone +1 (877) 445-8699
 Email bankmanager@landveritas.com
 Web <http://landveritasmitigationbanks.com/>

**Mitigation Banking vs.
 Applicant-Sponsored Mitigation**

Need a clearer understanding of your mitigation options? Our comparison table highlights the major differences between applicant-sponsored mitigation and mitigation banking.

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	Applicant-Sponsored	Mitigation Banking
1. Requires purchase and/or dedication of land for mitigation.	✓	
2. Requires approved Habitat Mitigation and Monitoring Plan (HMMP) prior to permit issuance.	✓	
3. Requires applicant to post letters of credits or bonds for permit issuance.	✓	
4. Requires conservation easement approved by Corps' legal counsel, often prior to grading.	✓	
5. Requires long-term management plan prior to grading.	✓	
6. Requires 3 rd party non-profit for CE compliance and long-term management plan.	✓	
7. Requires non-wasting endowments for CE compliance and long-term management, reporting, and maintenance.	✓	
8. Requires plant installation; five years of monitoring, maintenance; and reporting and compliance with performance standards, including CRAM report.	✓	
9. Requires purchase of credits from an approved mitigation bank only.		✓

All documents require review and approval by resource agencies. Estimated timing for items 1 through 6 above: 12 to 24+ months.

Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued



PETERSEN RANCH MITIGATION BANK

Summary

Land Veritas (LV), a Women-Owned Business Entity, is the sponsor of The Petersen Ranch Mitigation Bank (Bank). The Bank was approved and the first credit release occurred in June 2016. Located in unincorporated Leona Valley, Los Angeles County, California, the Bank contains approximately 4,103 acres and consists of two properties: The Petersen Ranch Bank Property (approximately 3,789 acres) and the Elizabeth Lake Bank Property (approximately 314 acres), as shown in Exhibit A. The Elizabeth Lake property is an inholding within the Angeles National Forest and therefore suitable for mitigation on federal lands (see attached maps). While the Elizabeth Lake property is located within the Santa Clara River watershed, the Petersen Ranch property is located at the headwaters of two major watersheds, as the divide between the Santa Clara River and Antelope Valley-Fremont Valley watersheds bisects the Ranch. The results in a large service area in which the Bank's credits can be sold.

Implementation of the Bank's Development Plan will result in the establishment/re-establishment, rehabilitation, enhancement, and/or preservation of many aquatic features including streams, wetlands, alluvial floodplains, and non-wetland riparian areas to mitigate for impacts authorized through Section 404 of the Clean Water Act, the Porter-Cologne Water Quality Control Act (Porter-Cologne), and Section 1600 of the California Fish and Game Code (CFG code), as well as mitigation for impacts authorized under CEQA and CESA. In addition to the features described above, the Bank Properties contain habitat for Swainson's hawk (state threatened species) as well as other special-status species including, but not limited to, western pond turtle, tricolored blackbird and coast horned lizard, as well as several sensitive vegetation communities. The United States Army Corps of Engineers (Corps), Environmental Protection Agency (USEPA), Lahontan Regional Water Quality Control Board (Lahontan RWQCB) and California Department of Fish and Wildlife (CDFW) are signatory participants in the Interagency Review Team (IRT) that reviewed and approved the Bank over a 5+ year entitlement process.

The Bank Properties are being established in multiple phases comprised of six geographic areas (Areas A – F) through implementation of the Development Plan and Bank Enabling Instrument (BEI). Phase 1 of the bank included the recordation of conservation easements and implementation of restoration actions within Area A on the Petersen Ranch Property and Area E of the Elizabeth Lake Property. Subsequent phases will be constructed and incorporated into the Bank over time. The Bank Properties will be managed in perpetuity with funding provided by a non-wasting endowment. Both the conservation easement and endowment are held by the Southwest Resource Management Association, a CDFW-approved non-profit land trust.

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Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued

**Regulations Covered**

The Bank has five categories of credits that can be used to mitigate impacts associated with the following regulations:

404 Credits:

- Section 10 of the Rivers and Harbors Act,
- Section 404 of the Clean Water Act,
- Section 401 of the Clean Water Act,

Porter Cologne Credits:

- the Porter Cologne Water Quality Control Act,

1600 Credits:

- Section 1600 et seq. of the California Fish and Game Code,

Swainson's Hawk Credits:

- the California Endangered Species Act,

CEQA Credits:

- the California Environmental Quality Act

Description of Credits

The Bank has been approved to sell credits by the U.S. Corps, EPA, CDFW and the Lahontan RWQCB. Though not a signatory to the Bank, the Los Angeles Regional Water Quality Control Board has authorized permittees to purchase mitigation credits from the Bank to satisfy 401 certification requirements. The Bank supports numerous sensitive habitats and special status species as well as a number of unique restoration opportunities.

It is important to note that habitat types at the Bank are somewhat interchangeable and need not match up exactly with the impacted habitat type.

Service Area

Attached are service areas for each category of credits that are available. Service areas are the areas in which Mitigation and Conservation Banks are allowed to sell credits, however, impacts outside of the service areas may be mitigated on a case-by-case basis upon regulatory approval.

Pricing

Each of the Bank's credit categories overlap to form a bundled credit that can be used to mitigate for multiple resources under multiple jurisdictions. As a result, each credit is assigned a "Price Tier" based on the highest valued component within the bundle. For example; a Chaparral CEQA credit that overlaps with a 404 credit is assigned a higher Price

Land Veritas Corp

1001 Bridgeway, Suite 246, Sausalito CA 94965

p 415.729.3733



Tier than a Chaparral CEQA credit that cannot be used for 404 mitigation. There are twelve different credit price tiers, ranging from the highest for 404 re-establishment credits to the lowest for Swainson's hawk credits. Credit prices vary across a wide range, and can be provided through a direct consultation.

404 Credits and Porter Cologne Credits

404 Credits and Porter Cologne Credits can be used to mitigate impacts associated with waters and wetlands of the United States and waters and wetlands of the State. All 404 Credits are either classified as re-establishment or preservation, including riparian and upland buffer preservation credits. These credits cover numerous habitats including:

- **Alluvial Floodplains:** Diverse alluvial fan habitats containing complexes of braided ephemeral streams and riparian habitats
- **Ephemeral Streams:** Single thread seasonal streams and associated riparian habitats
- **Freshwater Marsh:** Seasonal to Perennial wetlands containing cattails and rushes and supporting special status species including western pond turtle and tri-colored blackbird
- **Open Water:** Mostly perennial deeply ponded areas providing important food and water sources for wildlife and supporting aquatic habitat for western pond turtle and amphibians
- **Seasonal Wetland:** Seasonally flooded depressions and large meadow complexes dominated with wetland grasses, rushes and sedges.
- **Wetland Riparian:** Wetland habitats with understory similar to seasonal wetlands and a diverse shrub and tree canopy of mulefat, willows, elderberry, cottonwoods and other riparian species.

1600 Credits

1600 credits can be used to offset impacts to CDFW regulated stream, riparian or lake habitats authorized under a Lake and Streambed Alteration Agreement. These credits include the following habitats which are the same as those described under the 404 Credits and Porter Cologne Credits, except where noted:

- **Alluvial Floodplain**
- **Ephemeral Stream**
- **Freshwater Marsh**
- **Open Water**
- **Seasonal Wetland**
- **Wetland Riparian**
- **Non-wetland Riparian:** A diverse mixture of riparian habitats ranging from xeric desert riparian scrub to upland Fremont cottonwood forests.

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Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued



For each of the above habitats the Bank has the following 1600 credit types:

- **Re-established:** Restoration of an upland habitat into an aquatic habitat in a location that was historically aquatic but had been converted to uplands through past human disturbance. This credit type comes from restoration activities that increase the amount of aquatic habitats within the Bank.
- **Rehabilitated:** Restoration of an existing, but degraded, aquatic habitat into a high quality habitat. This credit type comes from multiple restoration activities that work together to repair a previously impacted habitat to its natural condition.
- **Enhanced:** Improvement of an existing aquatic habitat through vegetation management or planting.
- **Preserved:** Protection of a high quality existing habitat.

Swainson’s Hawk Credits

The Bank has foraging credits for Swainson’s hawk. Potential nesting habitat has also been identified within the Bank, but nesting Swainson’s hawks have not been observed. In addition to Swainson’s hawk, the Bank also supports numerous special status species including western pond turtle, tricolored blackbird, coast horned lizard, Parish’s sagebrush, and Pierson’s morning glory, among numerous others.

CEQA Credits

CEQA credits can be used to offset impacts to natural vegetation communities. These credits cover multiple habitat types including the following:

- Bare Ground
- Chaparral
- Cismontane woodland, pinyon-juniper woodland
- Great Basin scrub
- Non-native woodland
- Open water
- Riparian forest
- Riparian scrub
- Seeps, meadows, marshes
- Valley and foothill grassland

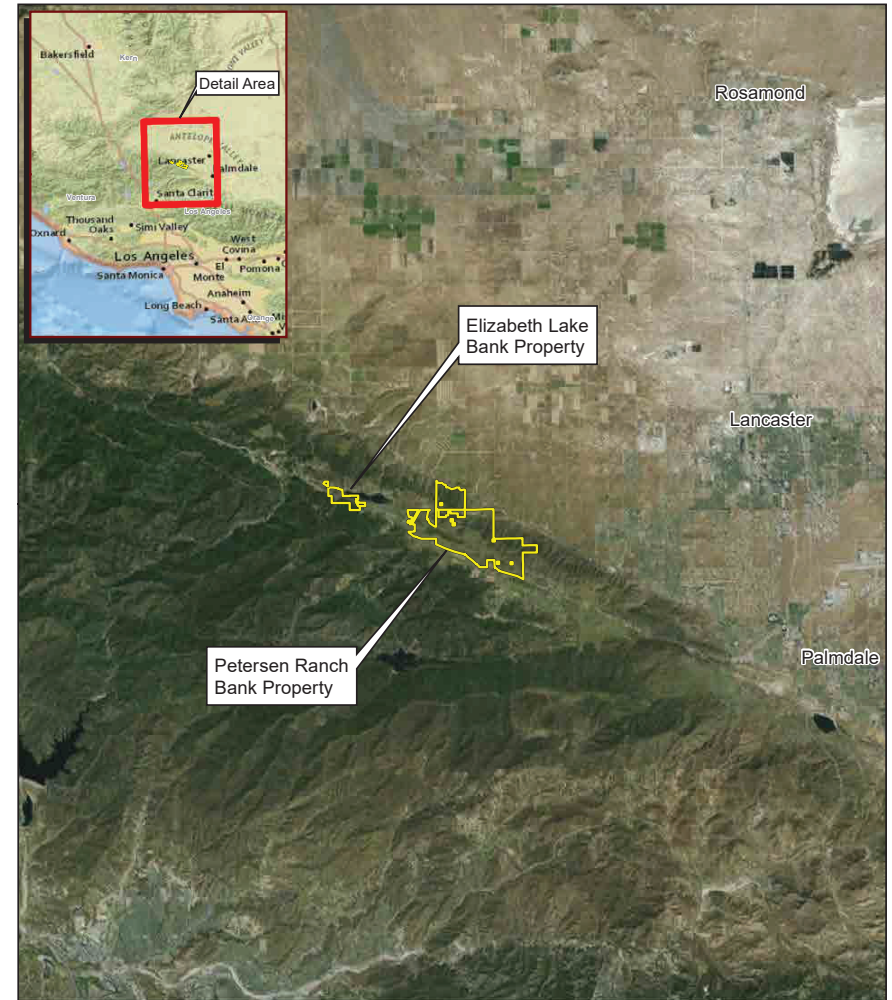


Figure 1: Location Map

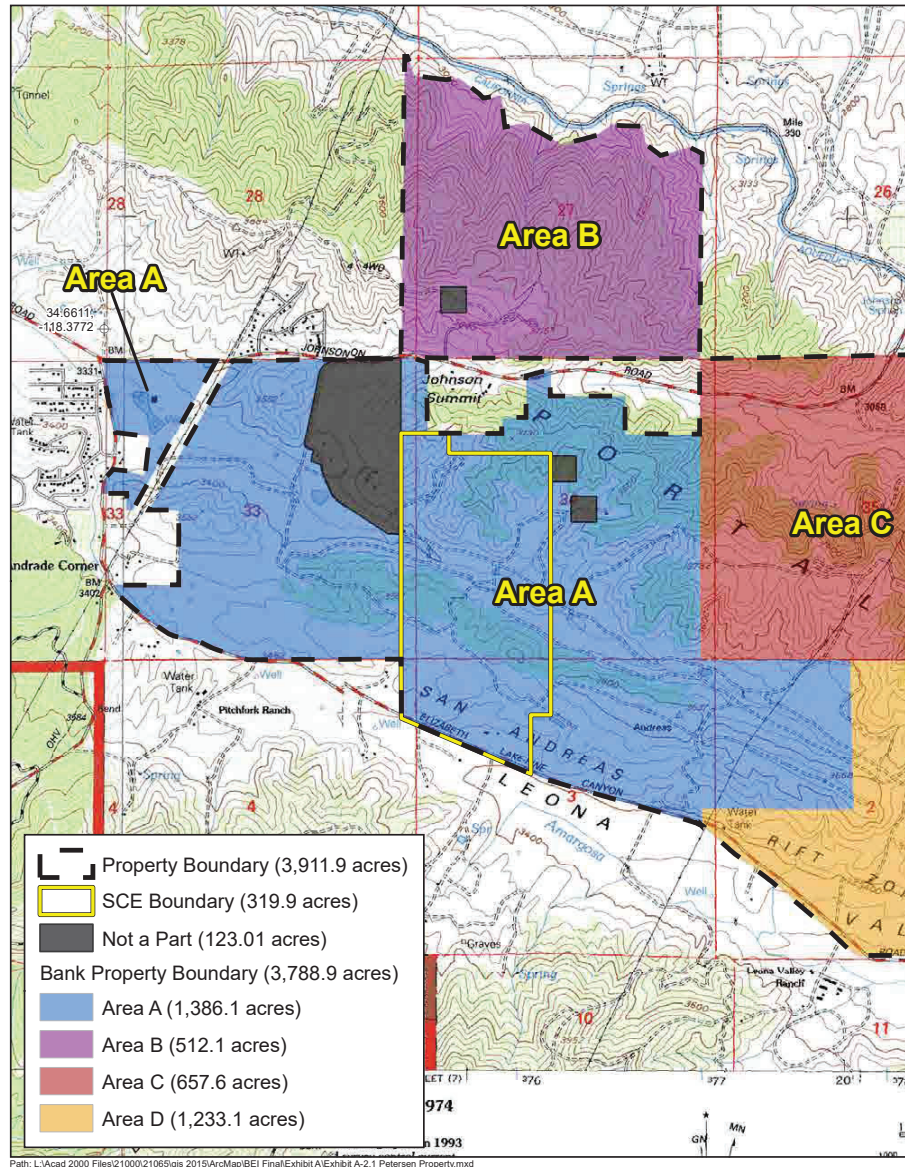
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Map By: Chris Zumwalt
Base Source: ESRI Microsoft 5/8/2010

Petersen Ranch Mitigation Bank
Los Angeles County, California

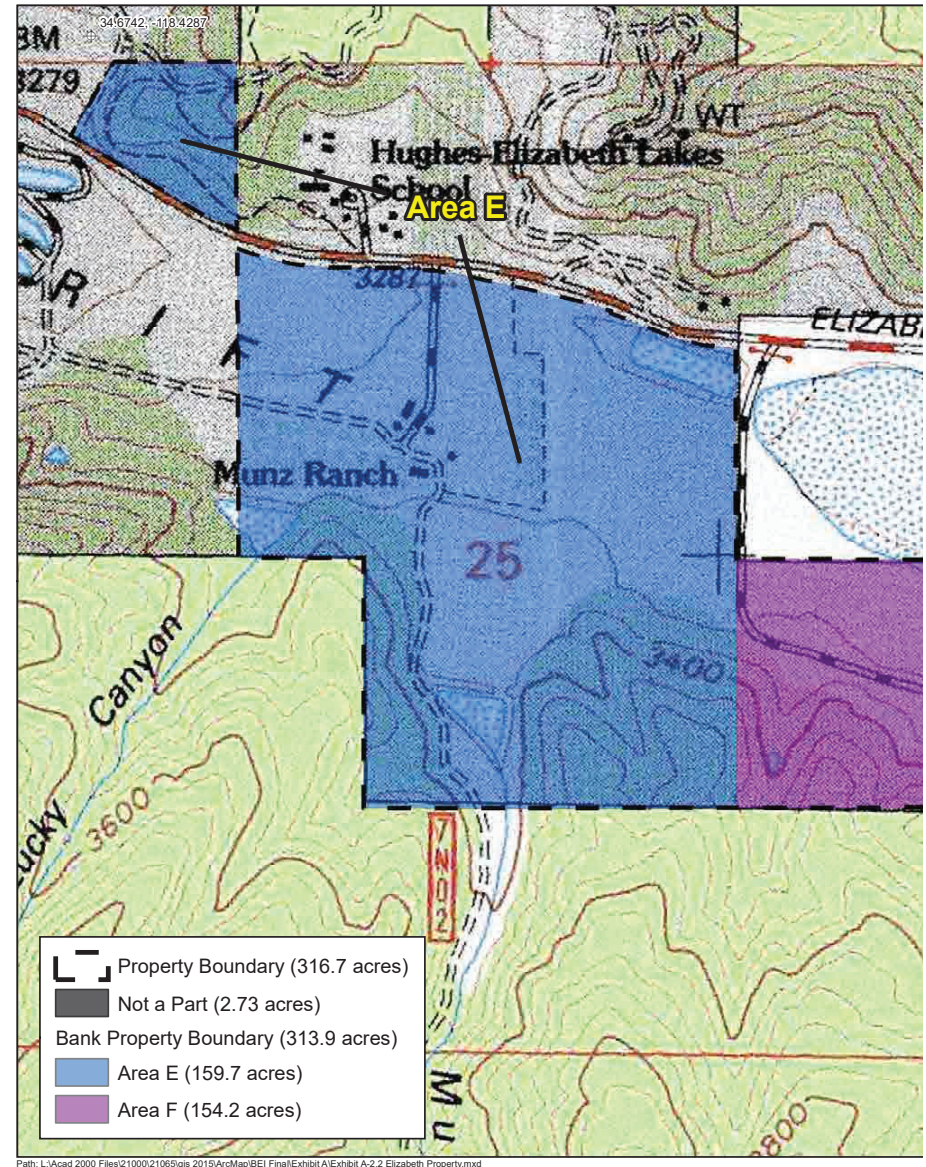
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Land Veritas Corp 1001 Bridgeway, Suite 246, Sausalito CA 94965 p 415.729.3733

Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued

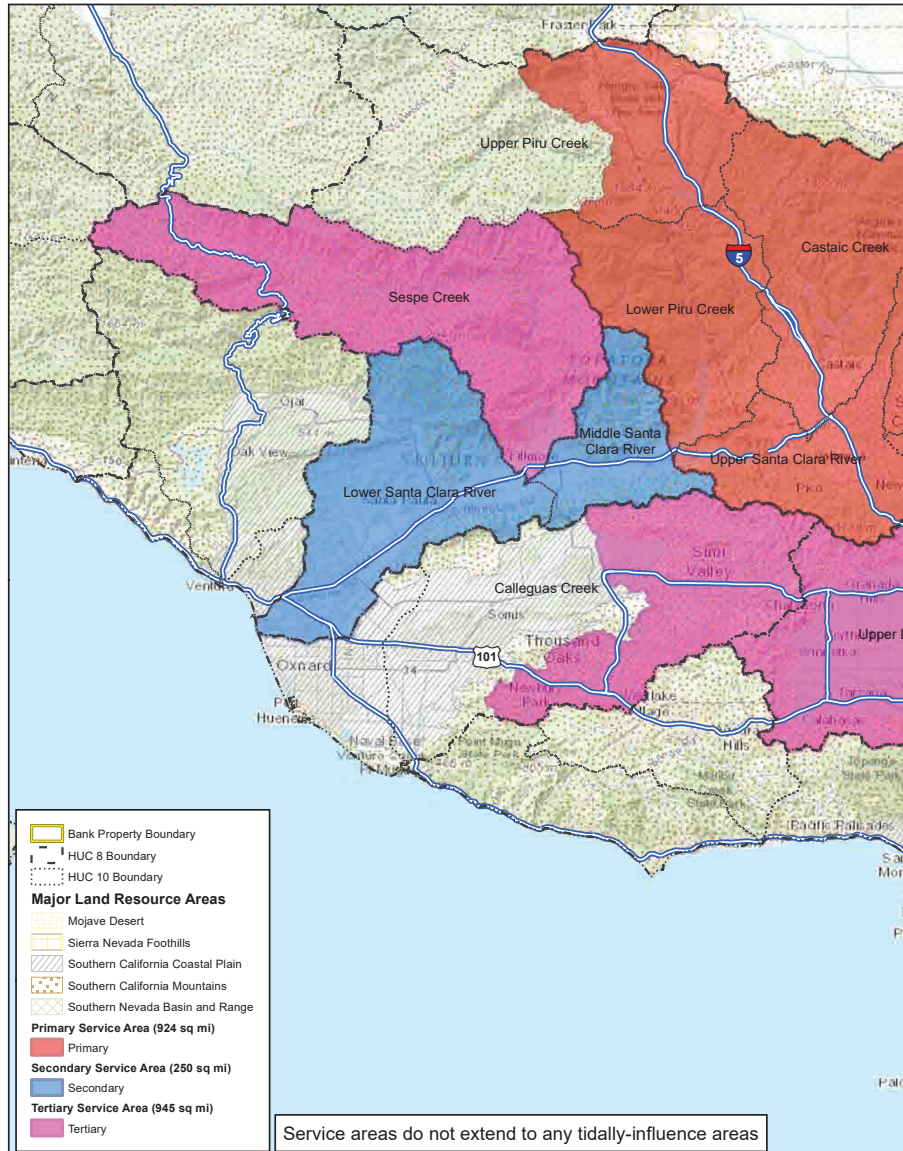


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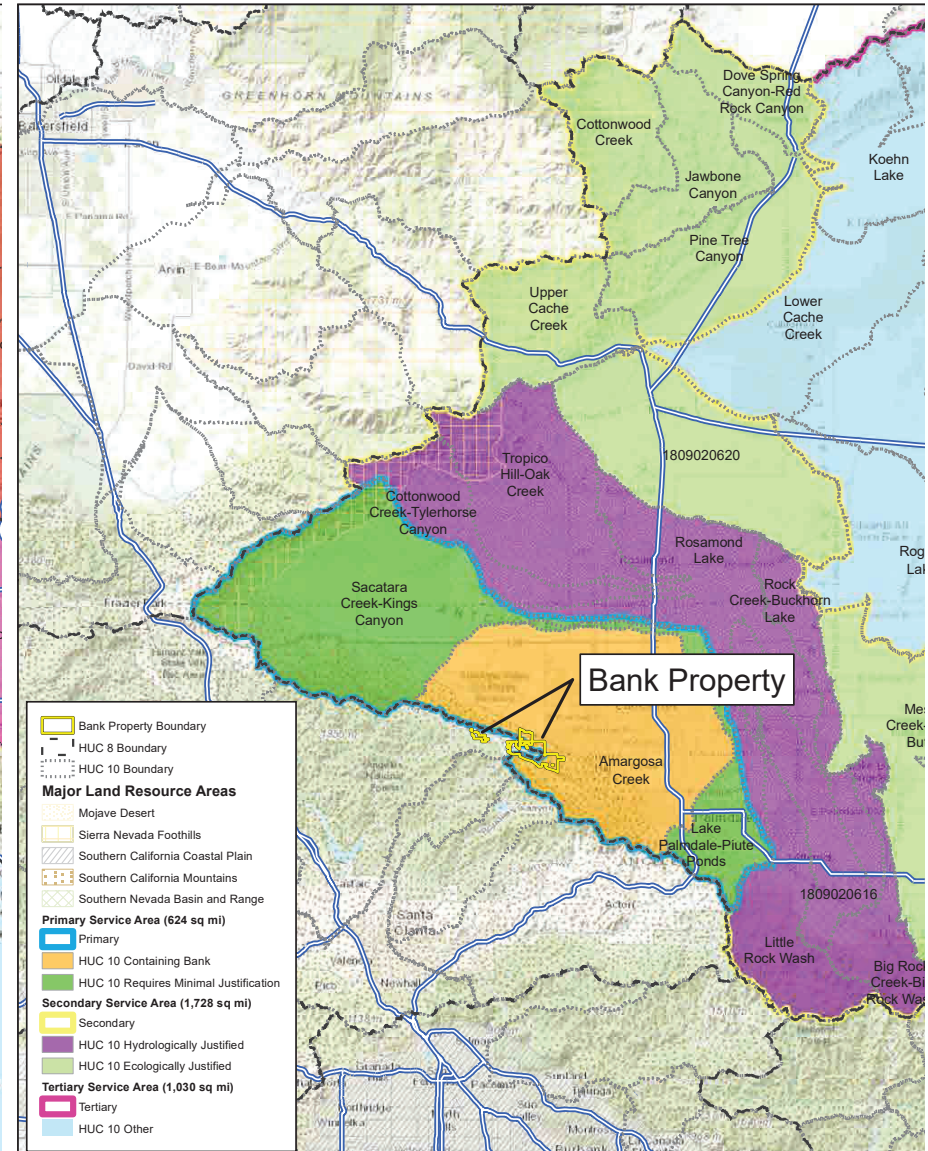


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Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued

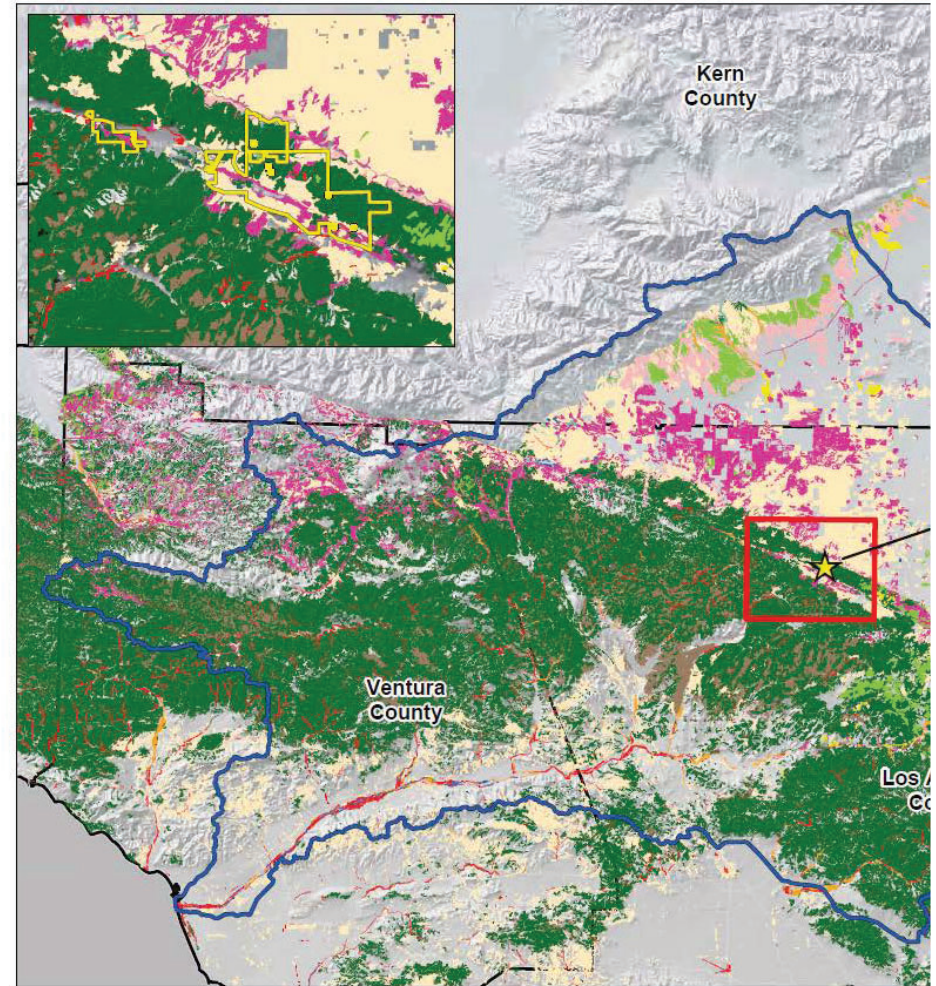
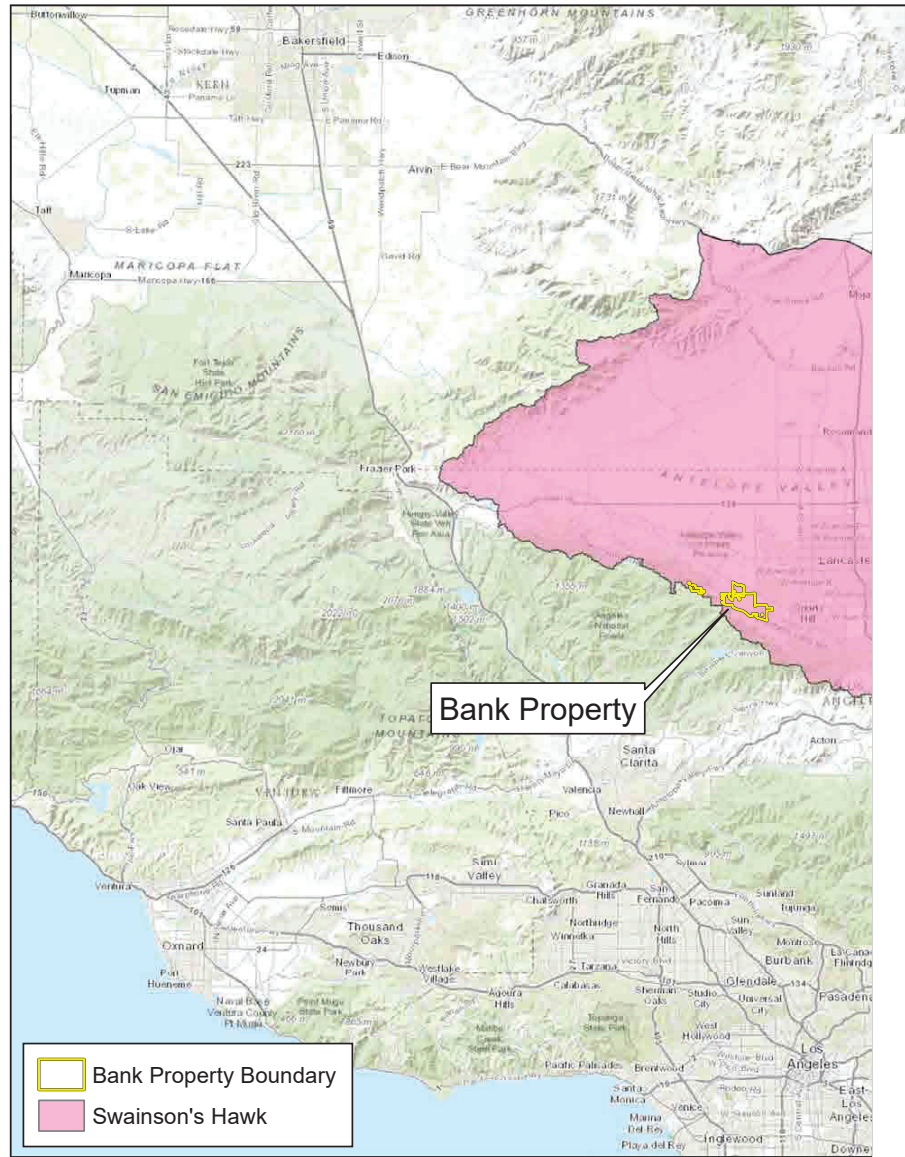


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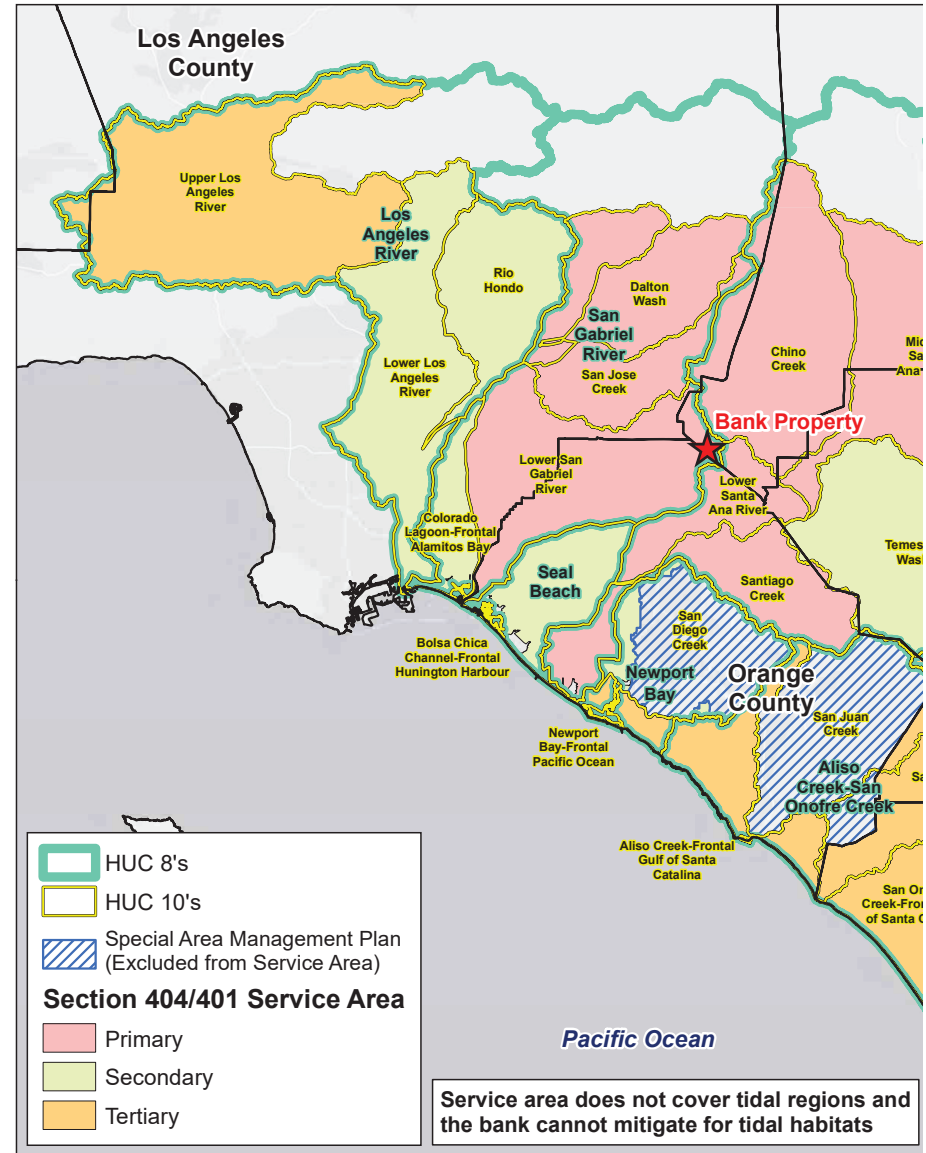
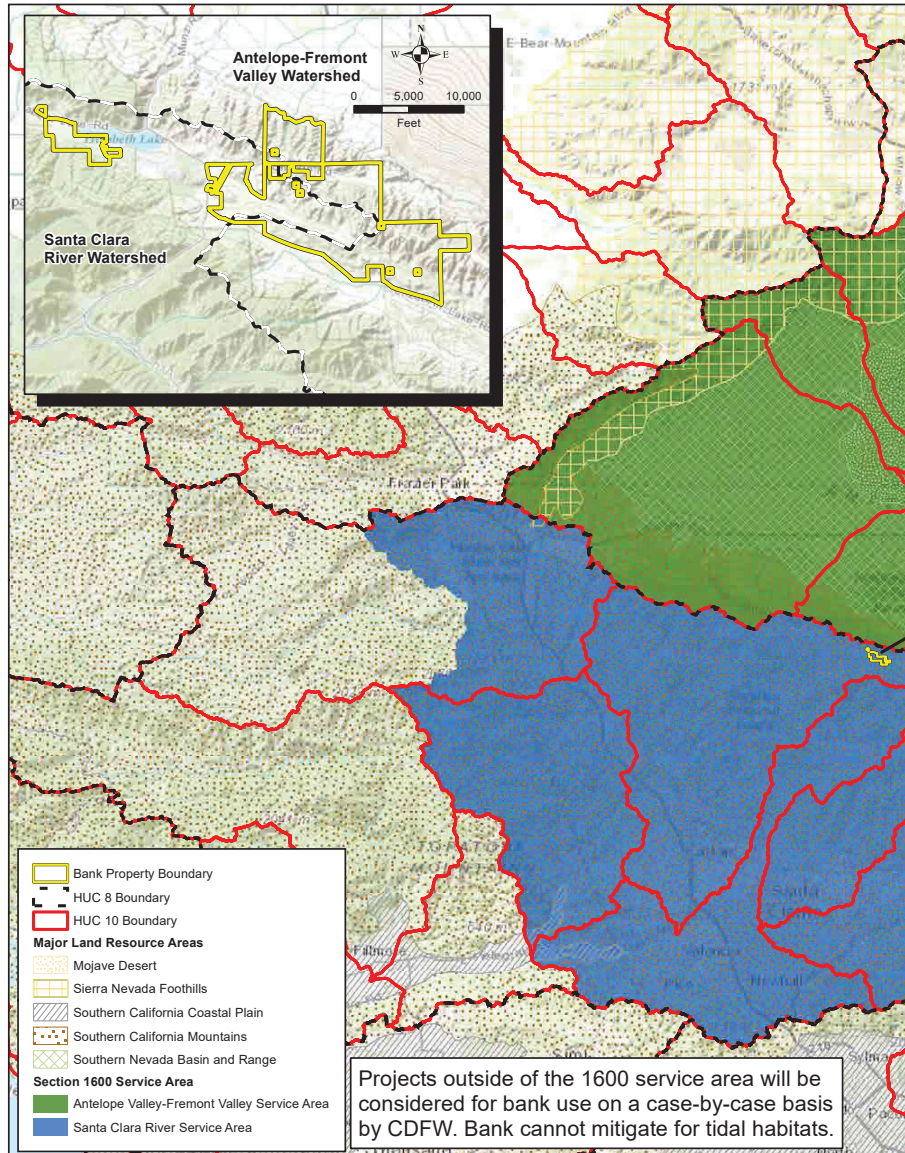


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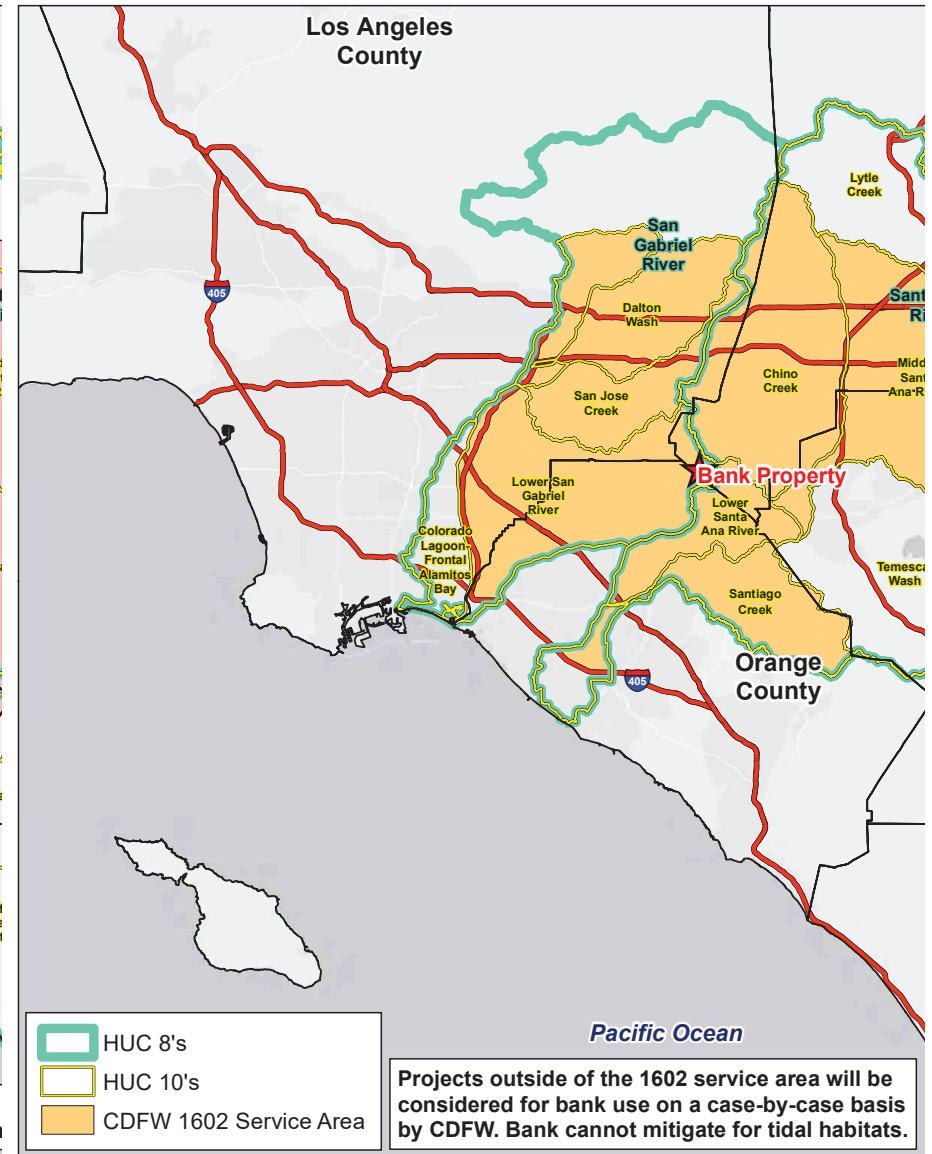
Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued



Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued



Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020) - Continued



Response to Submission 897 (H. Tracey Brownfield, Land Veritas Corp., August 31, 2020)

897-1762

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.

897-1763

The commenter provides suggested edits to mitigation measure BIO-MM#47, summarizing state and federal agency preferences for purchasing mitigation credits from an agency-approved mitigation banks as an acceptable method of fulfilling required compensatory mitigation for impacts to jurisdictional aquatic resources. The commenter suggests that BIO-MM#47 should be edited to state that there are agency preferences for the purchase of mitigation credits over other forms of compensatory mitigation. The Authority acknowledges the state and federal regulations and policies cited in the comment; however, there is no state or federal requirement for any project proponent to implement one acceptable form of mitigation over another. Therefore, no revisions to this Final EIR/EIS have been made in response to this comment.

The Authority has worked closely with state and federal resource agencies throughout multiple tiers of environmental analysis for the HSR Project, and has established project-specific permitting procedures and memoranda of understanding with various agencies. Further, the Authority refers the commenter to Response to Comment 882-1655, contained in this chapter of this Final EIR/EIS (submitted by the United States Army Corps of Engineers). The comment states that the United States Army Corps of Engineers considers all HSR Project impacts to concrete-lined channels (which include all impacts on aquatic resources for the HSR Project) as temporary impacts for Section 404 Clean Water Act permitting purposes. This letter also confirms that the United States Army Corps of Engineers would not require any compensatory actions outlined in mitigation measure BIO-MM#47.

Submission 795 (Misty Iwatsu, Lincoln Heights Benefit Assn of LA, June 25, 2020)

Burbank - Los Angeles - RECORD #795 DETAIL

Status : Action Pending
Record Date : 6/25/2020
Submission Date : 6/25/2020
Interest As : Business and/or Organization
First Name : Misty
Last Name : Iwatsu

Stakeholder Comments/Issues :

795-1430

Please send me relevant information regarding Lincoln Heights and surrounding areas in Los Angeles

Response to Submission 795 (Misty Iwatsu, Lincoln Heights Benefit Assn of LA, June 25, 2020)

795-1430

The commenter requests relevant information regarding Lincoln Heights. This community is a designated Neighborhood Council Area that is discussed extensively throughout the Draft EIR/EIS, and specifically analyzed in Section 3.12, Socioeconomics and Communities. In response to public comments on the Draft EIR/EIS, design changes were made to the Main Street Grade Separation to further reduce impacts to the Lincoln Heights community to the extent feasible. Refer to Section 3.12.6.3 of this Final EIR/EIS for an updated discussion of impacts. Design changes to the Main Street Grade Separation have resulted in 1 fewer single-family residential displacement and 4 fewer commercial displacements in the vicinity of the Main Street Grade Separation that were previously identified in the Draft EIR/EIS. Authority Outreach provided a presentation to the commenter and her organization (Lincoln Heights Benefit Association) at 12pm on July 21, 2020 and detailed the HSR Build Alternative in Lincoln Heights. Following this meeting, the commenter was provided the Executive Summary for the Draft EIR/EIS in English, Spanish, and Mandarin for community review. On August 18, 2020 the commenter was provided information about the Main Street workshop, and Authority Outreach worked with the commenter's organization to post a banner at the community's Farmers' Market on August 19, 2020. Information regarding impacts to this community in particular are discussed in Section 3.12.6.3. Most pointedly, the Final EIR/EIS discusses that within the Lincoln Heights Neighborhood Council Area, displacements would be clustered within the area of the new Main Street overcrossing. Businesses that would be subject to displacement in the area are generally industrial and commercial establishments directly adjacent to a residential neighborhood. The removal of these businesses (24 total businesses throughout the City of Los Angeles) and would change the nature and character of this community by removing swaths of businesses that are directly adjacent to the established neighborhood. Several neighborhoods within the city of Los Angeles show high community cohesion based on demographic indicators, including Lincoln Heights. Because Lincoln Heights possesses a high degree of community cohesion, it is reasonable to conclude that the right-of-way displacements in this neighborhood as a result of the HSR Build Alternative would have disruptive effects on the community and would contribute to a degradation of community character and cohesion within the Lincoln Heights neighborhood. However, research was conducted to address current business vacancy rates in the San Fernando Valley, Central Los Angeles, and Los Angeles Basin areas to provide the overall business vacancies and support the findings

795-1430

presented in Section 3.12.6.3 of the Draft EIR/EIS that there is sufficient relocation areas for the displaced businesses (in Table 3.12-48). This "gap analysis" concluded that the displacement and relocation of local businesses from permanent construction impacts would not degrade community character and cohesion within Lincoln Heights.

Submission 864 (Misty Iwatsu, Lincoln Heights Benefit Association of Los Angeles, August 27, 2020)

Burbank - Los Angeles - RECORD #864 DETAIL

Status : Action Pending
Record Date : 8/27/2020
Submission Date : 8/27/2020
Interest As : Business and/or Organization
First Name : Misty
Last Name : Iwatsu

Stakeholder Comments/Issues :

864-1579

Hoping we can get a model or some kind or 3D design to show impact to the community, property owners and businesses along the Lincoln Heights section of the project.

--

Misty Iwatsu, Executive Director
Lincoln Heights Benefit Assn of LA

Response to Submission 864 (Misty Iwatsu, Lincoln Heights Benefit Association of Los Angeles, August 27, 2020)

864-1579

The commenter requests a model or 3D design to show impacts on the community, property owners, and businesses along the Lincoln Heights section of the project. Visual simulations for Key Views 18 through 22 are provided in Section 3.16 of this Final EIR/EIS and depict the HSR Build Alternative from various areas along the existing rail corridor between State Route 110 and Interstate 10. In particular, Key View 19 is within the Lincoln Heights community and shows a rendering of the proposed project at Main Street. As discussed in Section 3.16.6 of this Final EIR/EIS, the HSR Build Alternative would not have a significant impact on any of these key views, including Key View 19. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 787 (Ellen Endo, Little Tokyo Business Association, August 1, 2020)



LITTLE TOKYO BUSINESS ASSOCIATION
LITTLE TOKYO BUSINESS IMPROVEMENT DISTRICT

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Jason Toyoshima (Sushi Gen Restaurant)

July 31, 2020

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

Subject: California High-Speed Rail Authority (CHSR) – Burbank to Los Angeles Project Section Project, Draft EIR/EIS Comment

Dear CHSR Board Members:

The Executive Committee of the Little Tokyo Business Association (LTBA) ardently supports the efforts of the California High Speed Rail Authority Board of Directors to create an efficient, world-class high speed rail system that will include express service from Hollywood-Burbank Airport to Union Station.

We are also pleased to add our support for the Burbank to Los Angeles Project Section of the Draft EIR/EIS.

Little Tokyo has developed into one of downtown L.A.'s most vibrant districts and will soon welcome Metro's Regional Connector hub. As managers of the Little Tokyo Business Improvement District (LTBID), which serves over 400 predominantly small businesses, we feel strongly that adding key improvements in Southern California and the Bay Area, while continuing high-speed rail construction in Central California, will maximize future mobility and connectivity and help address the needs of the diverse and culturally rich communities along the corridor.

We encourage your continuing efforts to ensure that the vision of a high speed rail system becomes a reality.

Yours truly,

Mike Okamoto
President
Little Tokyo Business Association

David Ikegami
Chair
LTBA Transportation Committee

787-1411

Response to Submission 787 (Ellen Endo, Little Tokyo Business Association, August 1, 2020)

787-1411

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

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

Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020)



California High Speed Rail Authority
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071
Burbank_Los.Angelas@hsr.ca.gov

August 31, 2020

RE: California High Speed Rail Authority Burbank to Los Angeles Draft EIR/EIS Comments

898-1764

This letter is submitted on behalf of Lockheed Martin Corporation (“Lockheed Martin”) to provide comments on the May 29, 2020 California High Speed Rail Authority Burbank to Los Angeles Draft EIR/EIS (“Burbank to Los Angeles Draft EIR/EIS”) for the California High Speed Rail Project (“Project”) for consideration in this California Environmental Quality Act (“CEQA”) and National Environmental Policy Act (“NEPA”) proceeding. Lockheed Martin objects to the approval of the Project and its implementation to the extent that the California High Speed Rail Authority (“Rail Authority”) does not consider the significant environmental impacts to Lockheed Martin’s remedial activities in the San Fernando Valley and the underlying soil and groundwater conditions in the cleanup area nor plan for avoidance/mitigation of such impacts as discussed below. The impacts of the Project to and the location of the referenced remediation infrastructure are included in the attached letter from Lockheed Martin’s technical consultant, CDM Smith (Exhibit A).

898-1765

Lockheed Martin is and has been conducting remediation activities in the San Fernando Valley Superfund Sites under the oversight of the United States Environmental Protection Agency (“EPA”), pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §§ 9606 and 9607 (“CERCLA”), as amended by the Superfund Amendments and Reauthorization Act of 1986 (“SARA”) and the Los Angeles Regional Water Quality Control Board (“Regional Board”), pursuant to the Porter-Cologne Water Quality Control Act, California Water Code section 13000 et seq. The Burbank to Los Angeles Draft EIR/EIS does not disclose or evaluate potential significant impacts of the Project to soil and groundwater subject to Lockheed Martin’s remediation activities and to the related supply of safe drinking water to local communities. Nor does the draft EIR/EIS identify alternatives or mitigation efforts that may be able to avoid or reduce such impacts. Lockheed Martin cannot support the adoption, approval or implementation of the Project based on an EIR/EIS that does not disclose or consider these significant environmental impacts and does not analyze how such impacts could be avoided or reduced by alternatives to the proposed Project path or through mitigation efforts.

EPA has issued a Record of Decision (“ROD”) prescribing an interim remedy for the San Fernando Valley Burbank Operable Unit (“BOU”)¹ (Exhibit B) and entered into a Consent Decree with Lockheed Martin to implement the remedy (Exhibit C). In addition, Lockheed

¹ The BOU is part of Area 1 of the San Fernando Valley Superfund Sites.

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California High Speed Rail Authority
August 31, 2020

Martin is responding to Cleanup and Abatement Order 87-161, issued by the Regional Board, to address sources of soil and ground water contamination at Lockheed Martin’s former facilities located in Burbank, CA (Exhibit D). The remedy includes extraction wells and pipelines that extract and convey the groundwater to a treatment plant in Burbank that ultimately provides drinking water to citizens in the Burbank area. The treatment plant removes groundwater contaminants, including trichloroethylene, tetrachloroethylene, and 1,2,3-trichloropropane, to drinking water levels established by the California Department of Health Services, Division of Drinking Water (“DDW”). The remediation infrastructure cannot be relocated without impairing the groundwater remedy itself and the ongoing supply of drinking water to the public. Such infrastructure, moreover, cannot be modified without the approval of multiple agencies including EPA, the Regional Board, and DDW. The Project, as described in the Burbank to Los Angeles Draft EIR/EIS, may adversely impact the wells and conveyance infrastructure that is necessary and required to implement the cleanup of impaired groundwater. These potential impacts of the Project were not disclosed or evaluated in the Burbank to Los Angeles Draft EIR/EIS, and thus no alternatives or mitigation to avoid or reduce such impacts were analyzed and presented to the public or decision-makers for review.

898-1766

898-1767

In addition, the construction of the tunnel and Burbank Airport Station may adversely impact the containment of existing contamination in the underlying soils, resulting in migration of contaminants to the aquifer, which is inapposite to the goals of the Regional Board-approved source remediation and the EPA-approved remediation of the San Fernando Valley Superfund Sites. The potential for the Project to cause migration of contaminants in soil and groundwater is not adequately discussed, nor are potential methods of avoiding or mitigating potential contaminant migration evaluated, in the Burbank to Los Angeles Draft EIR/EIS. Lockheed Martin submits that potential adverse impacts to groundwater plumes that have been under active remediation for decades must be avoided by the Project (and/or mitigated) to the greatest extent possible.

898-1768

The fundamental purpose of an EIR is “to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment.” (Public Resources Code § 21061.) An EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project. (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 405.) An EIR must contain facts and analysis, not just the agency’s bare conclusions or opinions. (Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn. (1986) 42 Cal.3d 929, 935.)

The Burbank to Los Angeles Draft EIR/EIS, as currently drafted, does not identify or discuss alternatives and/or mitigation that could avoid or reduce the likely adverse impacts on Lockheed Martin’s remediation efforts at the San Fernando Valley Superfund Sites, Area 1; impacts on contaminant plume containment and potential migration of such plume; and impacts on the supply of drinking water to local communities via the Burbank treatment plant. This results in an inadequate and deficient environmental document in violation of both CEQA and NEPA. Lockheed Martin requests that the Rail Authority fully consider the impacts of the Project on the ongoing remediation efforts at the San Fernando Valley Superfund Sites and evaluate alternatives and mitigation efforts that could avoid or reduce such impacts. Lockheed

Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued

898-1769

California High Speed Rail Authority
August 31, 2020

Martin objects to the approval of the Project to the extent the Rail Authority does not attempt to avoid or mitigate the significant environmental impacts identified in this comment letter.

By this letter, Lockheed Martin formally makes these comments, including all attachments, part of the Administrative Record for this CEQA and NEPA proceeding for consideration by the Rail Authority.

Thank you,



Kimberly L. Bick

EXHIBIT A

Attachments

Exhibit A – Comments from Technical Consultant CDM Smith
Exhibit B – BOU ROD
Exhibit C – BOU Consent Decree
Exhibit D – Regional Board Cleanup and Abatement Order

Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued



600 Wilshire Boulevard, Suite 750
 Los Angeles, California 90017
 tel: 213-457-2200

August 31, 2020

Subject: Draft Environmental Impact Report/Environmental Impact Statement
 California High-Speed Rail Project
 Burbank to Los Angeles Project Section

CDM Smith has conducted a review of Sections 3.8, 3.9 and 3.10 of the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the California High-Speed Rail Project (HSR Project), Burbank to Los Angeles Section. This review focuses on elements of the HSR Project within the City of Burbank, and more specifically, the Burbank Operable Unit (BOU). General comments are provided below.

Background

Between approximately 1925 and 1990 Lockheed Martin and other companies conducted aircraft and component manufacturing and testing in the City of Burbank, in and around what is now the Burbank Hollywood Airport. Figure 1 identifies ten former Lockheed Martin facilities in the City of Burbank area. After the discovery of environmental impacts to groundwater in the area, the US Environmental Protection Agency (USEPA) designated the regional groundwater plume in this vicinity as the BOU, within Area 1 of the San Fernando Valley Superfund Site. Under the USEPA 1989 Record of Decision, remediation was to be conducted by extracting groundwater in a manner that both removes contaminant mass and limits the migration of the impacted groundwater. The intent of the remedy is to restore the groundwater quality and to facilitate beneficial use of the aquifer for potable water supply. The HSR Project traverses the BOU from near Burbank Boulevard on the south to the Burbank Hollywood Airport property on the north.

The BOU groundwater remedy presently consists of eight, roughly 350-foot deep, groundwater extraction wells shown on the attached figure as Van Owen (VO)1 through VO8. Seven of the wells are adjacent to or within the HSR Project right of way (ROW). Four additional wells are planned for west of the existing wellfield to support the groundwater remediation effort in the North Hollywood area, but should not conflict with the currently proposed alignment. Groundwater pumped from the VO wells and the four future planned wells is conveyed to the BOU treatment plant located south of the HSR Project, and operated by the City of Burbank. After treatment, the water is blended with imported water and distributed to meet the potable supply needs of the City of Burbank and the City of Los Angeles. As such, these extraction wells serve two important functions: restoration of the aquifer and potable water supply. The DEIR/DEIS does not consider how the HSR Project will impact the continued function of the infrastructure that supports these two important functions.



August 30, 2020
 Page 2

In addition to the BOU groundwater remediation, Lockheed Martin is responsible for cleanup orders from the State Water Resources Control Board - Regional Water Quality Control Board - Los Angeles Region (RWQCB) associated with any of the former Plants identified on Figure 1, many of which are traversed by the HSR Project. The former Plant B-1 site, now the Burbank Empire Center, has environmental remediation infrastructure, consisting of wells, piping, and a soil vapor treatment plant, that is contributing to the restoration of the soil and protection of groundwater beneath the site and protection of public health. Former Plants A-1-North and B-6, both now redeveloped, also lie within the footprint of the HSR Project.

Potentially Significant Impacts

A number of features or activities associated with Lockheed Martin cleanup obligations could be impacted by the HSR Project. Most importantly the VO wells and associated infrastructure, all of which are currently in use and are required to remain in use and accessible by the USEPA, the City of Burbank, and Lockheed Martin pursuant to the Consent Decree. Attached to this comment letter are HSR Project Drawing Numbers TT-D1101B through TT-D1106 marked with the approximate locations of the VO wells.

A summary of potential impacts that were not identified or adequately addressed in the draft EIR/EIS includes:

- Interference with or loss of remediation/water supply wells; specifically VO2, VO3, VO4, VO5 and VO6, their associated observation wells (designated OW-VO on Figure 1), and infrastructure (e.g., underground well vaults, controls, pipelines, cathodic protection wells, motor controls, etc...).
 - VO2 and two observation wells – located within the Temporary Construction Easement (TCE)
 - VO3 and two observation wells – located roughly 10 feet from the TCE
 - VO4 and two observation wells – located within the proposed ROW for equipment
 - VO5 and two observation wells – located roughly 10 feet from the HSR retaining wall
 - VO6 and two observation wells – located a few feet from the HSR retaining wall, and on the Proposed Metrolink Shoofly (temporary construction track)
- Damage or loss of groundwater monitoring wells used to assess progress of the USEPA and RWQCB remedies. Up to 13 monitoring wells are located near the alignment that could be affected.

898-1770

898-1771

Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued



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- 898-1772 | • Loss of hydraulic containment of the BOU groundwater plume and off-site migration if extraction wells are taken off-line.
- 898-1773 | • Inability to provide required quantities of treated groundwater from the BOU plant to the cities of Burbank and Los Angeles.
- 898-1774 | • Delays to restoration of the eastern San Fernando Valley aquifer if the remedy is impacted.
- 898-1775 | • The proposed realignment of the existing open air stormwater channel east of Lincoln Street (DEIR/DEIS Figure 3.8-9) from the south side of the ROW to a new below ground channel on the north side, would place wells VO1, VO2 and VO3 closer, or adjacent to, the stormwater channel. While the DEIR/DEIS indicates that flooding would be reduced by this conversion, previously flooding from the channel in this area was on the opposite side of the ROW. Additionally, on page 3.8-56 it is noted that “*The placement of new structures associated with the Victory Place railroad bridge within the limits of the Lockheed Channel floodplain could result in additional flooding in a narrow strip along the north side of the Lockheed Channel, extending from N Buena Vista Street to Victory Place.*” The DEIR/DEIS should acknowledge that the VO drinking water supply wells (except VO8) are located in below-grade vaults and are not impervious to flooding. Flooding of supply wells with stormwater represents a significant risk to water supply and water quality. The relocation of the stormwater channel should include additional mitigation measures to prevent this from occurring.
- 898-1776 | • The HSR Project alignment along Van Owen Street lies essentially directly above the City of Burbank drinking water supply wells, and therefore mitigation measures identified to prevent infiltration of contaminants from the HSR Project construction and/or operation should acknowledge this.
- 898-1777 | • Potential impacts to the active Plant B-1 soil and soil vapor remediation infrastructure.

Other Comments

Should the well or conveyance line infrastructure be impacted, recent work within the BOU has highlighted the significant challenges of designing and building new wells and pipelines as highlighted below:

- New well locations must be selected such that they will maintain the hydraulic plume containment required by the USEPA remedy. Property is not always available at these locations, so in some cases well replacement may not be feasible.



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- 898-1778 | • New potable supply wells in an impaired water body, such as the BOU, must go through a lengthy permitting process with the State Water Resources Control Board, Division of Drinking Water (DDW). This process includes not only the new wells but may consider the entire water treatment process. Significant modifications to the BOU remedy could result, and DDW regulations should be recognized in the DEIR/DEIS.

898-1779 | Groundwater dewatering during construction would not be expected to be necessary within the BOU, contrary to the DEIR/DEIS assumption. Depth to first groundwater in 2019 ranged from 143 feet at well B-1-CW17 in the south, to 242 feet at well B-6-CW10 near the airport, and 284 feet at well 4948 in the north (Tetra Tech, 2019). Nonetheless, water levels fluctuate within the BOU and would rise appreciably if the VO extraction wells were shut off. Should dewatering of VOC impacted groundwater be necessary, treatment of the VOC containing water at the BOU treatment plant may not be feasible due to plant permit restrictions.

898-1780 | The USEPA, Burbank, and Lockheed Martin have collaborated for more than two decades to ensure that the environmental and economic benefits associated with restoring the aquifer and delivering potable water are achieved. The DEIR/DEIS does not acknowledge the potential for the HSR Project to impede progress toward this goal. Nor does it consider specific mitigation measures for protecting monitoring wells, extraction wells, conveyance piping, and other supporting utilities and equipment or specific mitigation measures for impacted soil/soil vapor within the Burbank area.

Prepared by:
Tom W. Davis, PG, CHG
Project Manager
CDM Smith Inc.

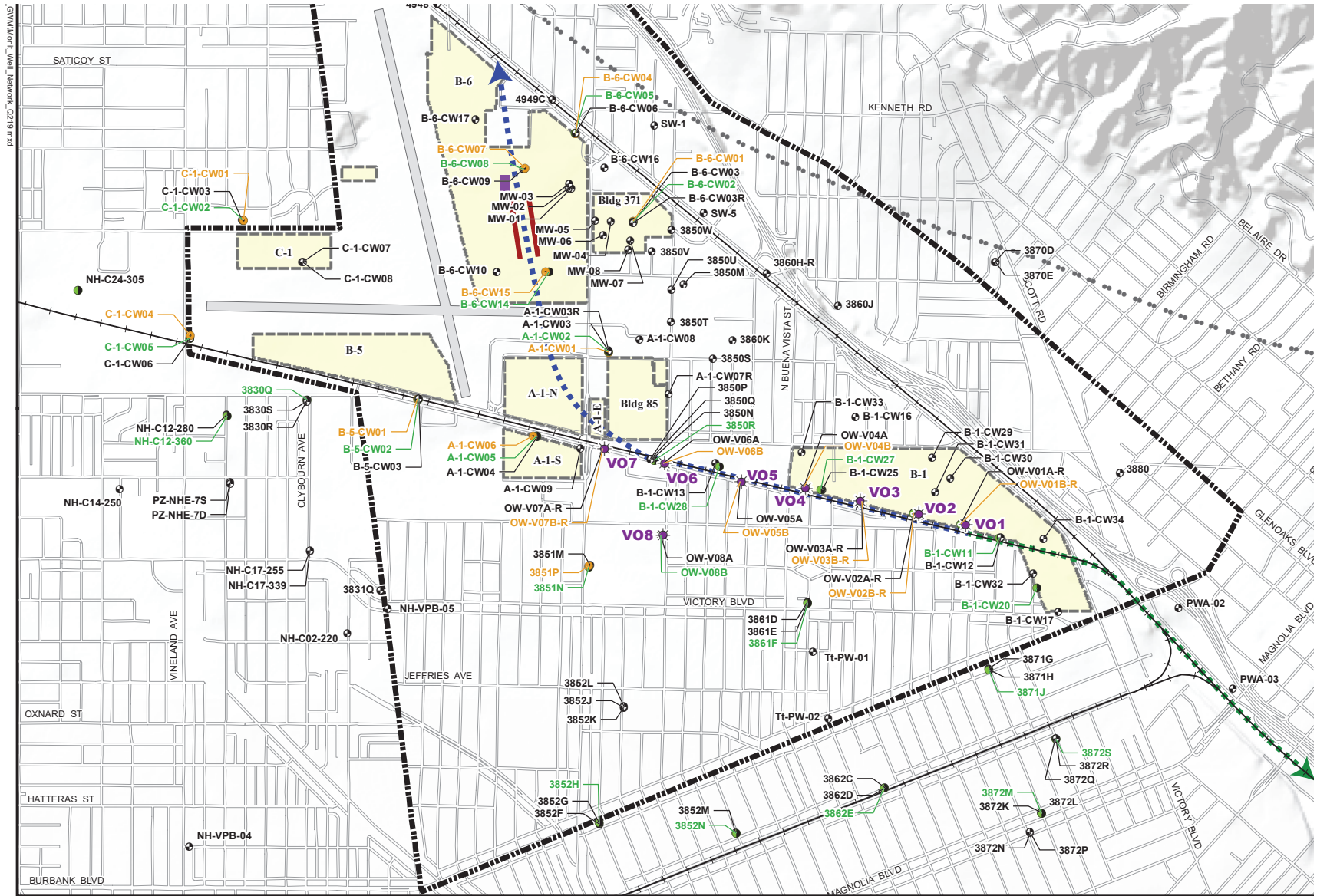
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Tetra Tech, 2019. *Annual Groundwater Monitoring Report Second Quarter 2019, Burbank Operable Unit*. September 2019.

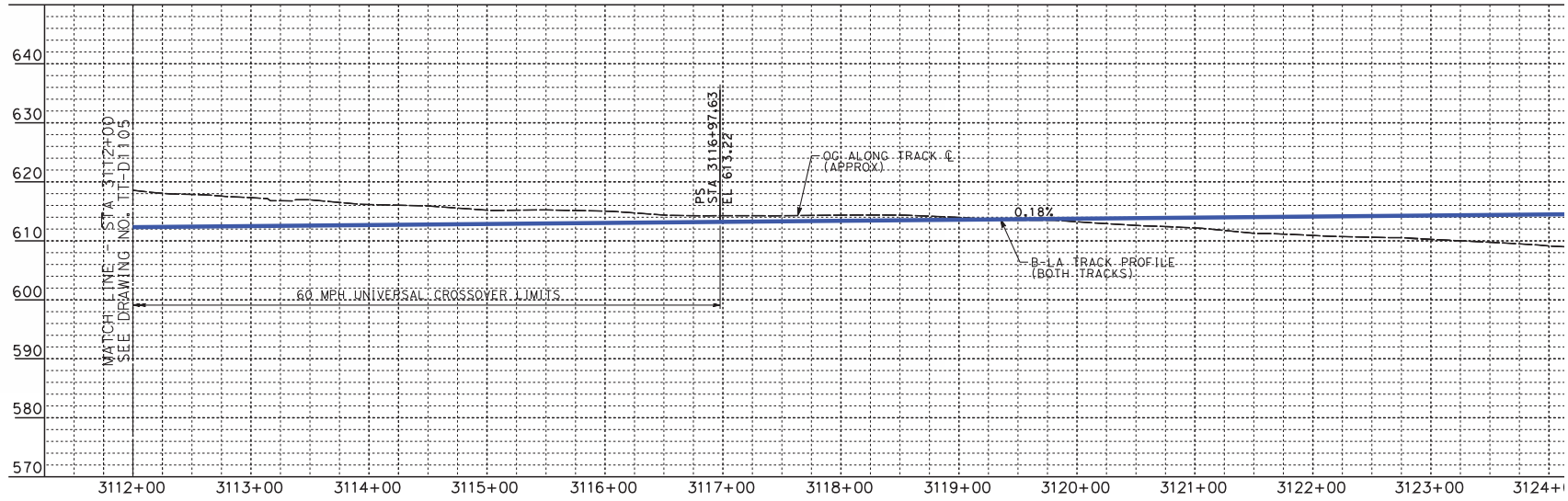
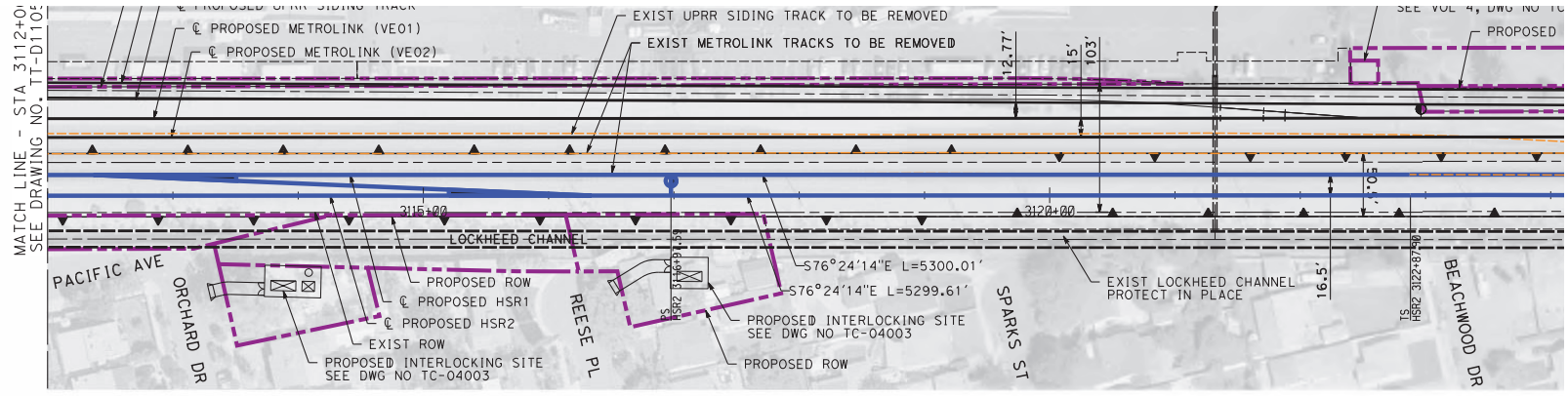
Attachments:

- Figure 1
- TT-D1101B
- TT-D1102
- TT-D1103
- TT-D1104
- TT-D1105
- TT-D1106

Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued



Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued



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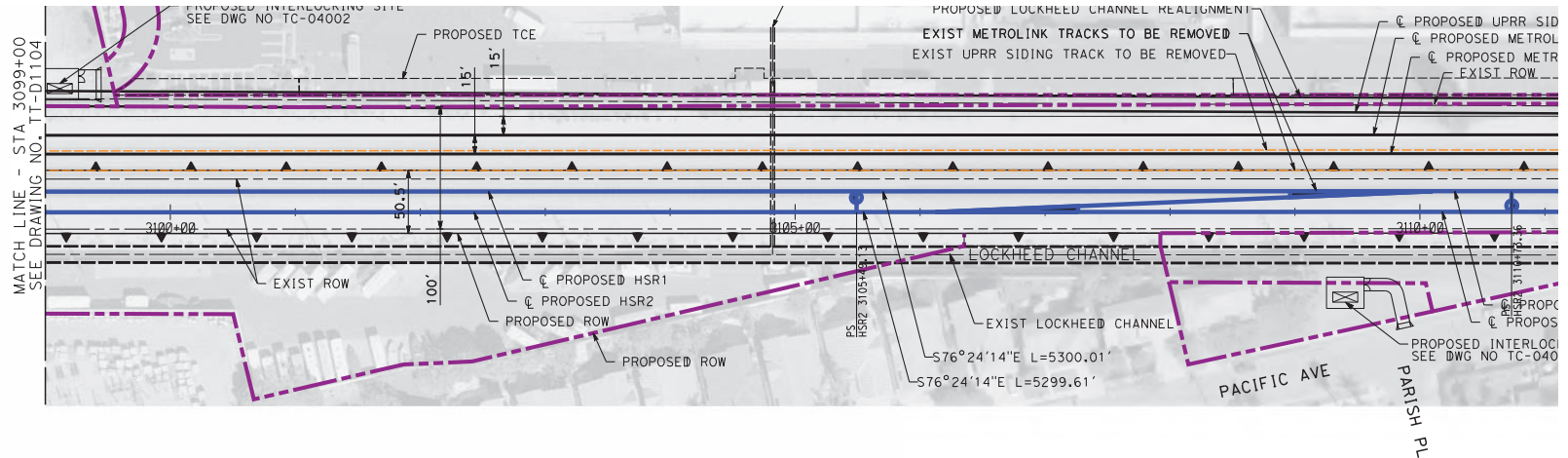
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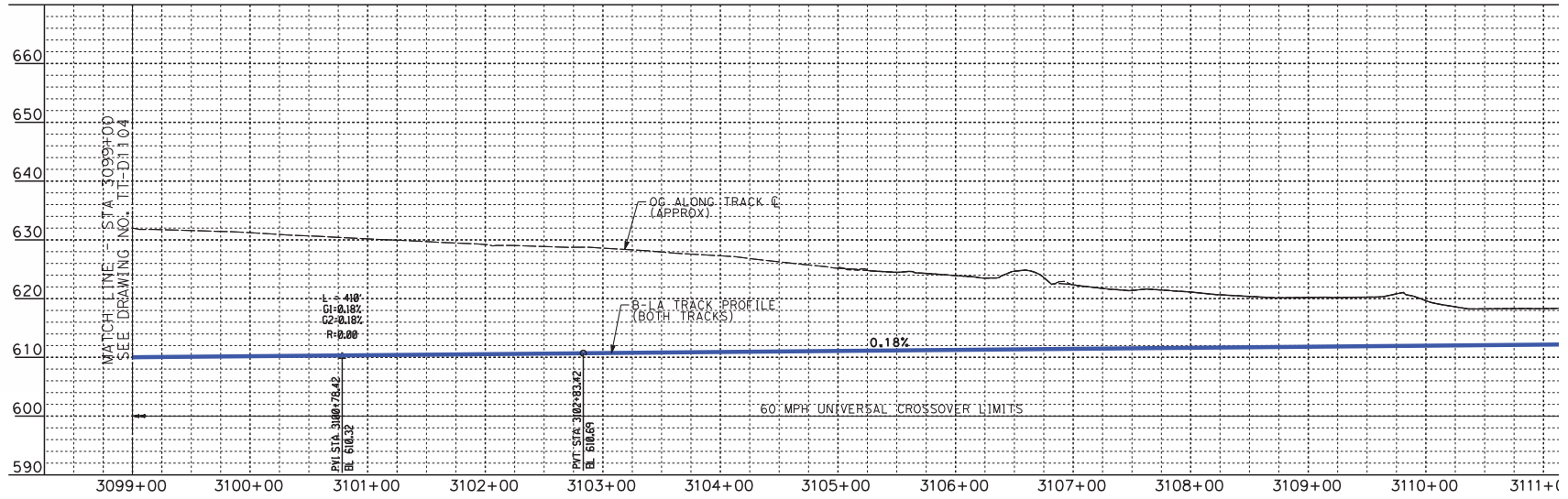


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Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued



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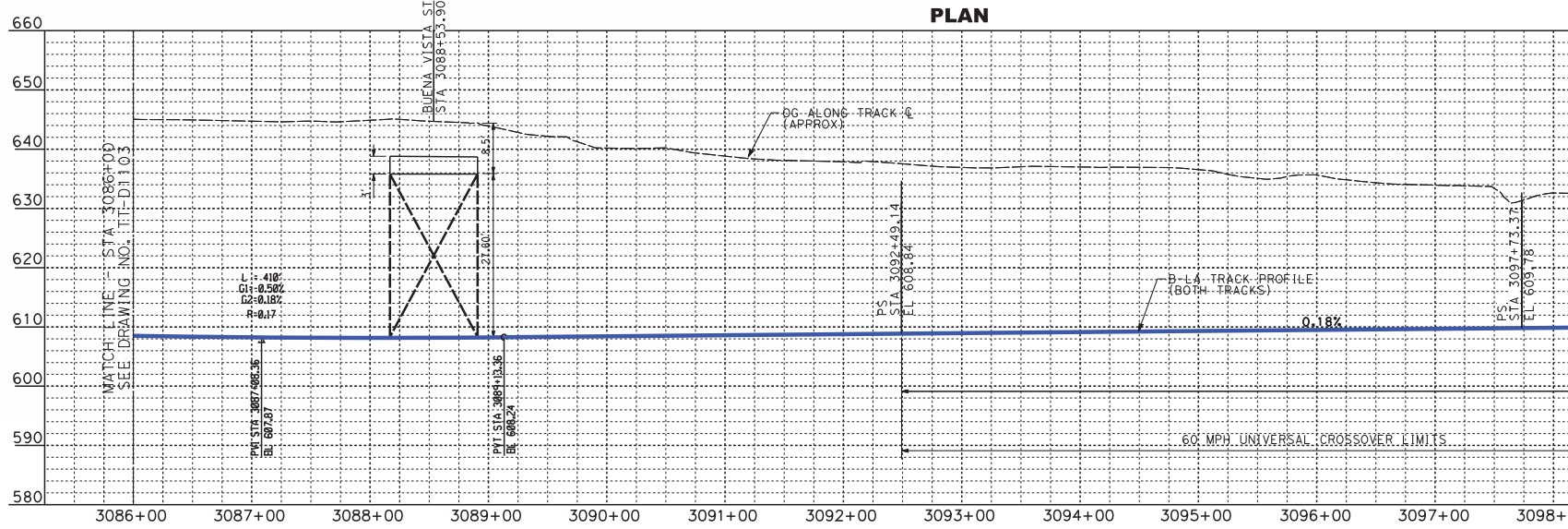
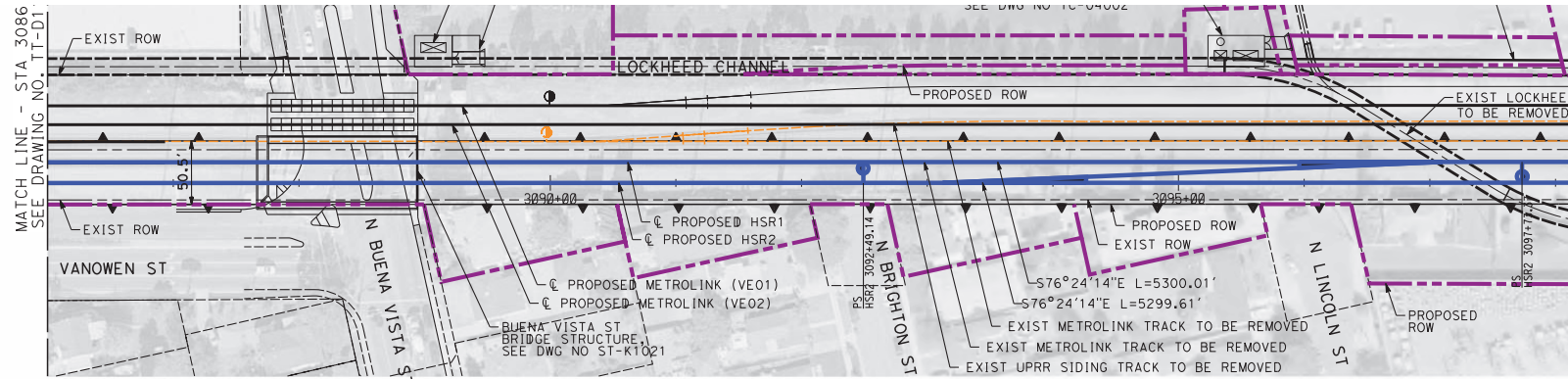
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Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued



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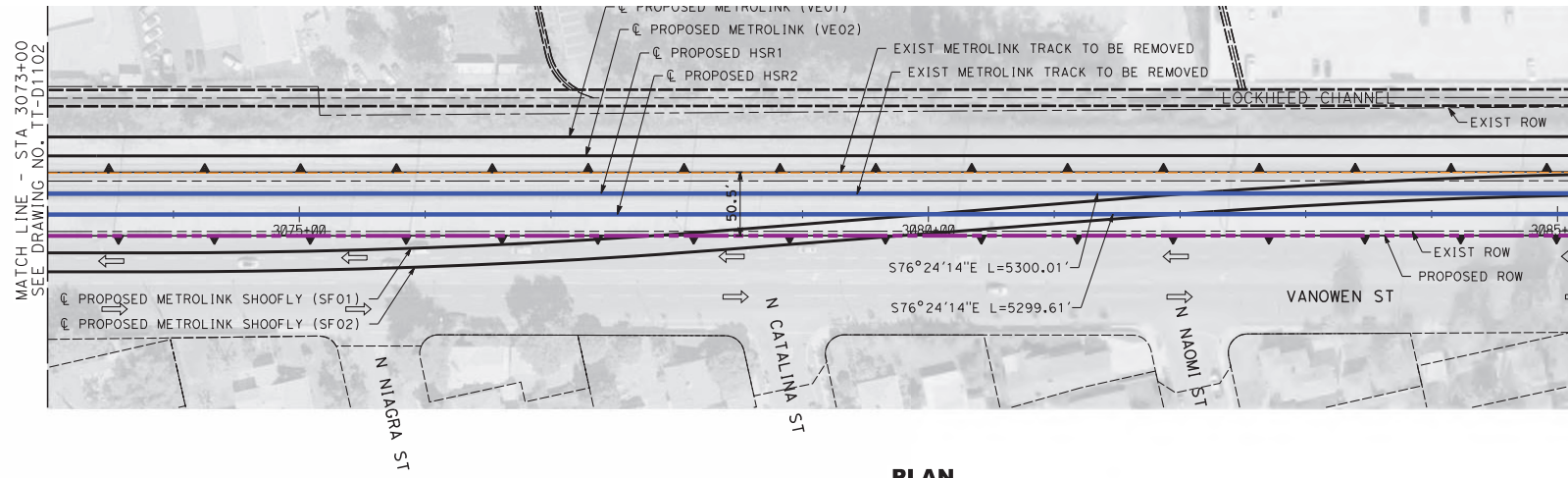
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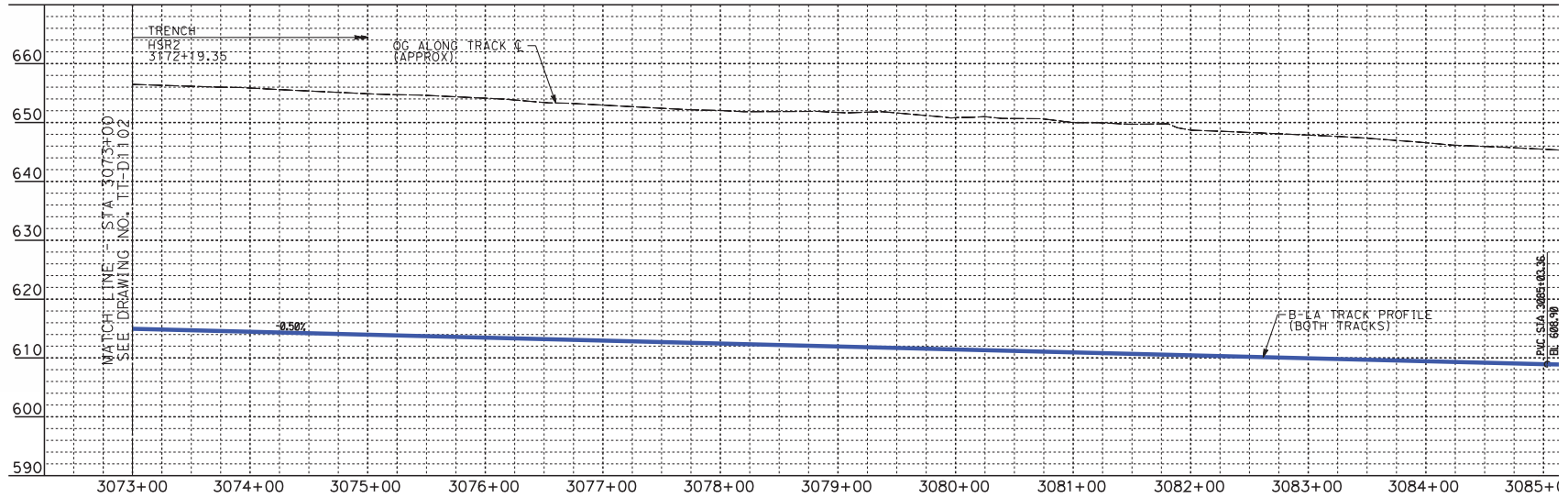


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Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued



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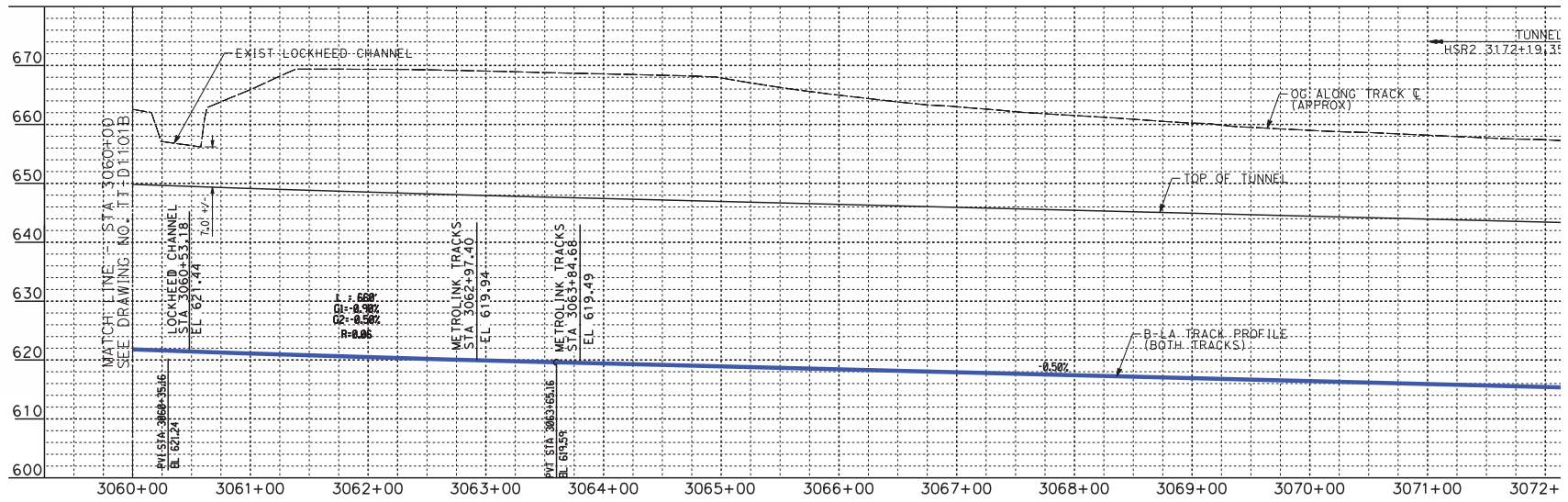
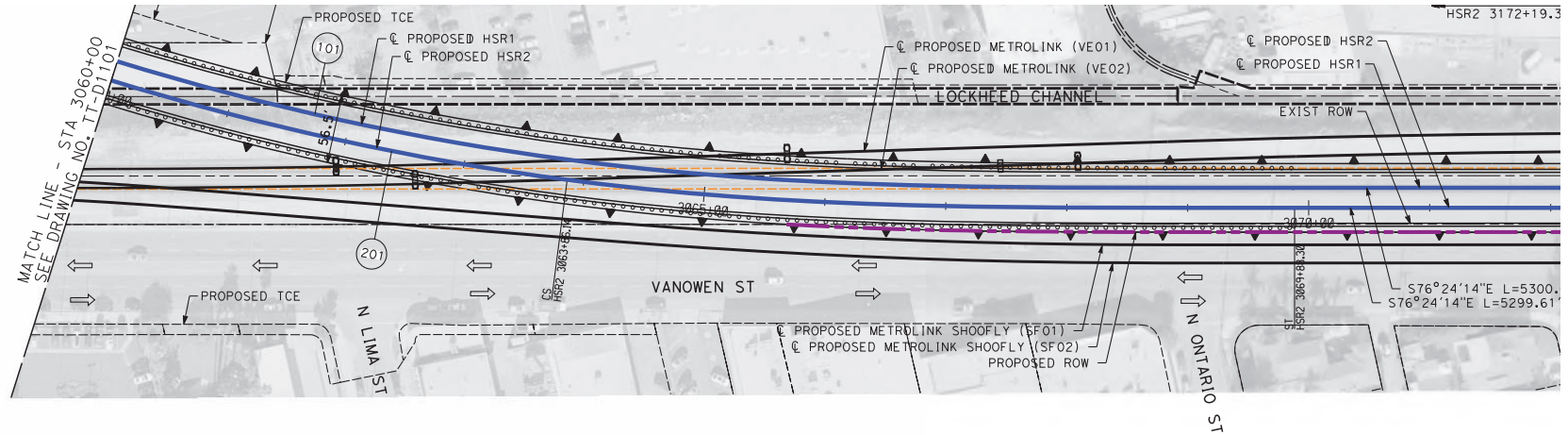
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Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued



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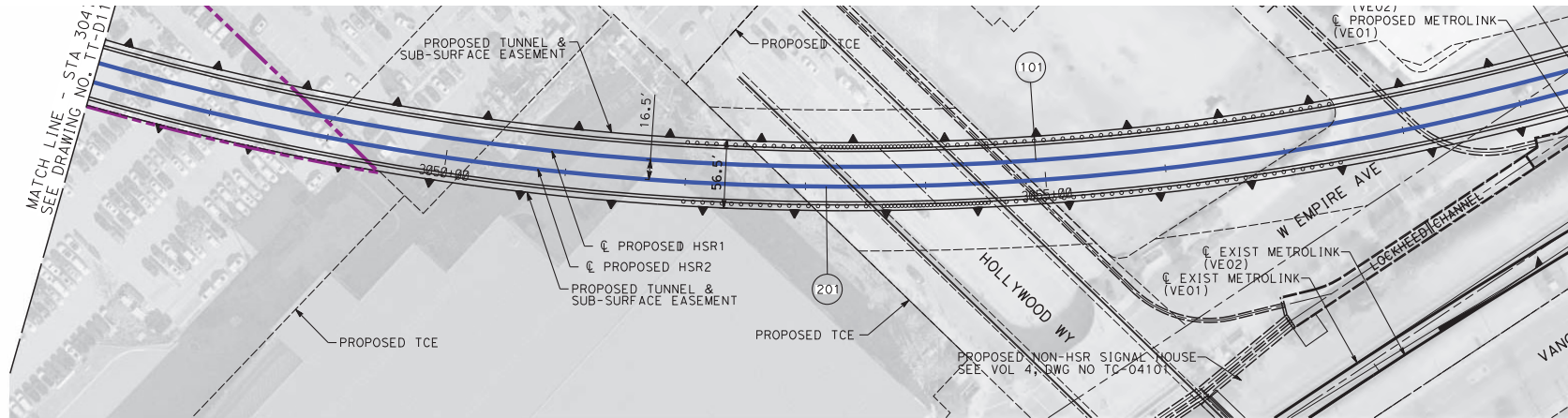
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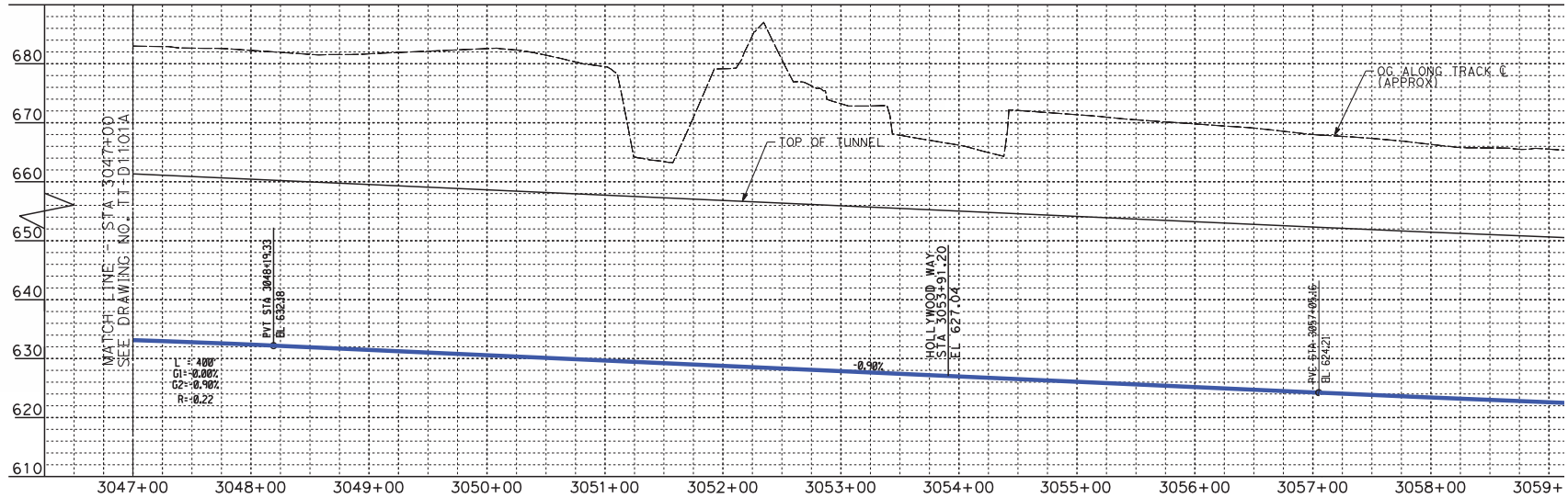


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Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued



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Response to Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020)

898-1764

Refer to Standard Response BLA-Response-GENERAL-03: General Opposition.

The commenter expresses their opposition to the HSR project because the Draft EIR/EIS did not consider the significant environmental impacts to Lockheed Martin's remedial activities in the San Fernando Valley. The commenter's concerns are acknowledged. The Draft EIR/EIS did assess and disclose impacts associated with the construction of the Build Alternative within contaminated sites. To clarify the discussion provided in the Draft EIR/EIS, the discussion contained within Section 3.10 of this Final EIR/EIS has been expanded to provide clarity related to the potential impacts of the project on the San Fernando Groundwater Basin Superfund Site and the ongoing remediation of the site. Refer to responses to comments 898-1765 through 898-1780 for detailed response to Lockheed Martin's specific comments.

898-1765

Lockheed Martin's remediation facilities are included in the list of PECs in Appendix 3.10-A. Section 3.10.5.1 of this Final EIR/EIS has been revised to clarify that the project is within the San Fernando Groundwater Basin Superfund site Areas 1, 2, and 4. 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. Text has been added to Section 3.10.6.3 stating that the Authority would coordinate the replacement of these wells with the USEPA as required under CERCLA. The replaced extraction wells would be installed and functional prior to the removal of any of the extraction wells for the San Fernando Valley Superfund site to avoid disruption of the ongoing remediation program for the Superfund site.

898-1766

The commenter states that potential impacts of the HSR Build Alternative to the remedies for the San Fernando Groundwater Basin Superfund site were not evaluated in the Draft EIR/EIS. Appendix 3.10-A in Volume 2 of the Draft EIR/EIS provided multiple references to the San Fernando Groundwater Basin Superfund site and those locations were identified in Table 3.10-6 of the Draft EIR/EIS under the discussion of Impact HMW #3, Hazards Due to Project Location on Potential Environmental Concern Sites or Cortese List Sites during Construction. Section 3.10.5.1 of this Final EIR/EIS has been revised to clarify that the project is within the San Fernando Groundwater Basin Superfund site Areas 1, 2, and 4. The discussion under Impact HMW #3 in Section 3.10.6.3 has also been revised to clarify the potential impacts of the HSR Build Alternative to the remedies for 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. Text has been added to Section 3.10.6.3 stating that the Authority would coordinate the replacement of these wells with the USEPA as required under CERCLA. The replaced extraction wells would be installed and functional prior to the removal of any of the extraction wells for the San Fernando Valley Superfund site to avoid disruption of the ongoing remediation program for the Superfund site.

Response to Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued

898-1767

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 Impact HWR #5: Temporary Impacts on Groundwater Volume, Quality, and Recharge during Construction explains 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. Previously conducted alternatives analysis considered the Antelope Valley line as an alternative to tunneling under the Burbank Airport; however, as discussed in the Burbank Airport Station Options Screening Report –Draft 2 (Authority 2018), this alternative was not carried forward due to its impacts to existing operation of the Antelope Valley line. Refer also to responses to comments 898-1765 and 898-1766.

898-1768

The commenter states that the Draft EIR/EIS did not identify or discuss alternatives and/or mitigation that could avoid or reduce the likely adverse impacts on Lockheed Martin's remediation efforts at the San Fernando Valley Superfund Sites. Appendix 3.10-A in Volume 2 of the Draft EIR/EIS provided multiple references to the San Fernando Groundwater Basin Superfund sites (including the Lockheed Martin site) and those locations were identified in Table 3.10-6 of the Draft EIR/EIS under the discussion of Impact HMW #3, Hazards Due to Project Location on Potential Environmental Concern Sites or Cortese List Sites during Construction.

Section 3.10.5.1 of this Final EIR/EIS has been revised to clarify that the project is within the San Fernando Groundwater Basin Superfund site Areas 1, 2 and 4. In addition, a reference to Appendix 3.10-A has been referenced in this section to direct the reader to additional detailed information. The discussion under Impact HMW #3 in Section 3.10.6.3 has also been revised to clarify the potential impacts of the HSR Build Alternative to the remedies for the San Fernando Groundwater Basin Superfund site.

898-1769

Refer to Standard Response BLA-Response-GENERAL-03: General Opposition.

The commenter expresses their opposition to the HSR project unless the Authority avoids or mitigates the significant environmental impacts identified in the comment letter. Please refer to responses to comments 898-1765 through 898-1780 for detailed responses to Lockheed Martin's specific comments.

Response to Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued

898-1770

The commenter expresses concern with the interference with or loss of remediation/water supply wells and related infrastructure necessary to control the spread of groundwater contaminants and provide residents with a water supply that meets local, state, and federal requirements. (e.g., underground well vaults, controls, pipelines, cathodic protection wells, motor controls). The HSR Build Alternative may result in the construction of new potable supply wells and pipeline conveyance. The discussion under Impact HMW #8 in Section 3.8.6.3 has been updated to state that the HSR Build Alternative would affect seven extraction wells in Area 1 used to extract contaminated groundwater from the Superfund site. Five of these wells (V01, V02, V03, V04, and V07) would be protected in place and their function would not be impaired. Two other wells would require replacement (V05 and V06). The design of the HSR Build Alternative would also require the relocation of the conveyance pipeline and some of the ancillary infrastructure, most notably the sampling cabinets, to allow for realignment of the Lockheed Channel. In Area 2, the HSR Build Alternative would conflict with one extraction well (GS-04), which would need to be replaced. The Authority would coordinate the replacement of these wells and infrastructure with the USEPA as required under CERCLA. The replaced extraction wells would be installed and functional prior to the removal of any of the extraction wells for the San Fernando Valley Superfund site to avoid disruption of the ongoing remediation program for the Superfund site. Groundwater modeling and all other studies required prior to the removal and installation of wells and other infrastructure will be performed consistent with applicable laws, regulations, and guidance, with prior approval of the EPA. Information from the USEPA Record of Decision for the San Fernando Valley (Area 1) Superfund site, issued in 1989; the Second Consent Decree for San Fernando Valley Superfund Site, Burbank Operable Unit; the Consent Decree for the San Fernando Valley Superfund Site, Glendale Operable Unit No. CV 99-00552 MRP (ANx); and the Cleanup and Abatement Order No. 87-161 dated December 17, 1987, were reviewed and incorporated into the Final EIR/EIS. Per the support documentation provided, the date given for implementation of groundwater remediation (1995), and the 20-year implementation period for operations and maintenance, the requirements for aquifer restoration should have been met in 2015.

898-1771

The commenter states that the Draft EIR/EIS does not adequately address the interference with or loss of specific Lockheed Martin remediation/water supply wells that are currently located within or near the proposed HSR Build Alternative right-of-way. VO2, VO3, VO4, VO5, and VO6 are located within or near the HSR Build Alternative right-of-way in the City of Burbank, along Vanowen Street. Figure 3.6-8, Water Lines, of this Final EIR/EIS identifies a portion of Vanowen Street near the Burbank Airport Station as an area of potential utility conflict. Impact PU&E#3, Conflicts with Existing Utilities, states that affected utilities within the RSA would be placed in a protective casing or relocated in order to maintain access for the respective provider. The discussion under Impact PU&E #3 in this Final EIR/EIS has been revised to identify specific conflicts with utilities and the eight existing extraction wells (7 wells in Area 1 of the Superfund site and 1 well in Area 2 of the Superfund site). Consistent with the discussion added under Impact HMW #3 in Section 3.10.6.3, IAMF-HMW#11 requires that the Authority coordinate with relevant stakeholders on an ongoing basis to review the permitting requirements as well as the project design and construction methods for proposed modifications to the extraction wells and ancillary infrastructure, to ensure that municipal water supplies and the effectiveness of the Superfund site clean-up remedies are not impaired by construction and operation of the HSR Build Alternative. The relevant stakeholders currently include the USEPA, the Regional Board, the California Department of Toxic Substances Control (DTSC), the California Department of Water Resources (DWR), the State Water Resources Control Board Division of Drinking Water (DDW), the Upper Los Angeles River Area (ULARA) Watermaster, the City of Burbank Water &Power (BW&P), the City of Glendale Water &Power (GW&P), Los Angeles, and Lockheed Martin with the other PRPs named in the Consent Decrees for the Area 1 and Area 2 Superfund sites. The Authority would coordinate with relevant stakeholders on issues such as ensuring system shutdowns occur within approved timeframes, maintaining operating of existing systems while testing new replacement systems, and providing additional groundwater or surface water supplies if needed. In addition, depending upon the scope of the potential modifications to the extraction wells and ancillary infrastructure, the Authority shall enter into enforceable agreements with the USEPA as the agency responsible for the Superfund Program.

Response to Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued

898-1772

The commenter states there would be a loss of hydraulic containment and off-site migration if extraction wells are taken off-line. As stated in Section 3.10.6.3 of this Final EIR/EIS, construction activities such as grading, cut-and-cover, trenching, or any other ground-disturbing activities could encounter contaminants or interfere with ongoing remediation efforts. Unless construction activities for the HSR Build Alternative are coordinated with site remediation activities, there could be a temporary increased risk of damage to or interference with remediation site controls (e.g., soil containment areas). Construction could also increase the risk of damage to or interference with groundwater remediation facilities (e.g., extraction and monitoring wells, pumps, and pipelines). Construction at sites with existing contamination could also result in the generation of additional waste materials and could expose workers to hazardous materials. For these reasons, construction activities would be coordinated with site remediation activities, reducing potential effects of damage or interfering with remediation site controls, such as soil containment areas. In addition, clarifying text has been added under Impact HMW #3 in Section 3.10.6.3 of this Final EIR/EIS to note that the Authority would coordinate the replacement of extraction wells with the USEPA as required under CERCLA and per HMW-IAMF#11 which requires coordination with relevant stakeholders on an ongoing basis to review the permitting requirements as well as the project design and construction methods for proposed modifications to the extraction wells and ancillary infrastructure to ensure that municipal water supplies and the effectiveness of the Superfund Site cleanup remedies are not impaired by construction and operation of the HSR Build Alternative. . The replaced extraction wells would be installed and functional prior to the removal of the existing wells so that there would be no effect to the ongoing remediation program for the Superfund site.

898-1773

The comment states that the Draft EIR/EIS does not adequately address the potential for the project to interrupt the ability of Lockheed Martin to meet its obligations to supply treated groundwater to the cities of Burbank and Los Angeles from the Burbank Operating Unit (BOU) (which is within Area 1 of the San Fernando Valley Superfund Site) to the Cities of Burbank and Los Angeles. Under the U.S. Environmental Protection Agency (USEPA) 1989 Record of Decision, remediation of this Superfund site was to be conducted by extracting groundwater in a manner that removes contaminant mass and limits the migration of impacted groundwater. The BOU groundwater remedy presently consists of eight groundwater extraction wells. Groundwater pumped from the extraction wells is conveyed to the BOU treatment plant (which is operated by the City of Burbank) and is then blended with imported water and distributed to meet the potable supply needs of the Cities of Burbank and Los Angeles. The Final EIR/EIS has been revised to identify specific conflicts with utilities and the eight existing extraction wells (7 wells in Area 1 of the Superfund site and 1 well in Area 2 of the Superfund site). As discussed in Impact PUE#3, all impacted utilities would be protected in place or replaced. Consistent with the discussion added under Impact HMW #3 in Section 3.10.6.3, IAMF-HMW#11 requires that the Authority coordinate with relevant stakeholders on an ongoing basis to review the permitting requirements as well as the project design and construction methods for proposed modifications to the extraction wells and ancillary infrastructure, to ensure that municipal water supplies and the effectiveness of the Superfund site clean-up remedies are not impaired by construction and operation of the HSR Build Alternative.

Response to Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued

898-1774

The commenter expresses concern that delays to the restoration of the eastern San Fernando Valley aquifer if impacted, is not adequately addressed in the Draft EIR/EIS. The HSR Project would incorporate IAMFs to avoid or minimize effects arising from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. HMW-IAMF#1 calls for conducting Phase 1 environmental site assessments to characterize each parcel and Phase 2 environmental site assessments (e.g., soil, groundwater, and soil vapor subsurface investigations) if sites are determined to be contaminated. Remediation or corrective action (e.g., removal of contamination, in-situ treatment) would be conducted as necessary. In addition, the Authority would coordinate the replacement of extraction wells with the USEPA as required under CERCLA and per HMW-IAMF#11 which requires coordination with relevant stakeholders on an ongoing basis to review the permitting requirements as well as the project design and construction methods for proposed modifications to the extraction wells and ancillary infrastructure to ensure that municipal water supplies and the effectiveness of the Superfund Site cleanup remedies are not impaired by construction and operation of the HSR Build Alternative. The relocated extraction wells would be installed and functional prior to the removal of the existing wells so that there would be no effect to the ongoing remediation program for the Superfund site.

898-1775

This comment states that the proposed realignment of the Lockheed Channel would result in flooding to supply wells VO1, VO2, and VO3. As shown on Figure 4.1 attached to the comment letter, supply wells VO1, VO2, and VO3 are located along the northern portion of the existing railroad right-of-way between Buena Vista Street and N Victory Place. As shown on Figure 3.8-8, Floodplains (Sheet 2 of 4), in Section 3.8, Hydrology and Water Resources, of this Final EIR/EIS, the 100-year floodplain associated with the Lockheed Channel between Buena Vista Street and N Victory Place is located north of the Burbank Empire Center shopping mall and not along the railroad right-of-way between Buena Vista Street and N Victory Place. In the existing condition, supply wells VO1, VO2, and VO3 are not within the 100-year floodplain associated with the Lockheed Channel where flooding occurs in the existing condition.

As discussed in Section 3.8.6.3 of this Final EIR/EIS under Impact HWR #8, and cited in the comment, the placement of new structures associated with the Victory Place railroad bridge within the limits of the Lockheed Channel floodplain could result in additional flooding in a narrow strip along the north side of the Lockheed Channel, extending from N Buena Vista Street to Victory Place. However, Section 3.8.6.3 of this Final EIR/EIS also states that the additional flooding would occur in an area that is already flooded during the 100-year storm event in the existing condition. As stated above, supply wells VO1, VO2, and VO3 are not located in the existing 100-year floodplain where flooding occurs in the existing condition. As such, the HSR Build Alternative would not result in the flooding of supply wells VO1, VO2, and VO3. No revisions to this Final EIR/EIS have been made in response to this comment.

Response to Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued

898-1776

The HSR Project alignment along Vanowen Street would be below grade. As stated in Section 3.8.6.3 of this Final EIR/EIS under Impact HWR #3, based on the historic groundwater levels in the city of Burbank, the below-grade sections 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 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 that passes through construction materials will be treated and tested in accordance with regulatory requirements. Groundwater that 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 through the area of improved ground would be minimal and the exposure to the groundwater regime would be isolated to the treated zones. As discussed under Impact HWR #5, 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, including the San Fernando Valley Burbank Operable Unit (BOU) which is located below the groundwater table. Groundwater levels, flow, 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 increase groundwater flows, drilling would stop and methods reevaluated 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 BOU or City of Burbank drinking water supply wells along Vanowen Street.

898-1777

As discussed in Section 3.10.6.3, Phase II ESAs will be prepared if sites are determined to be contaminated and remediation or corrective action (e.g., removal of contamination, in-situ treatment, or soil capping) would be conducted as necessary.

898-1778

The commenter expresses concern that the Draft EIR/EIS did not adequately address new wells in an impaired waterbody. Section 3.6.6.3 of this Final EIR/EIS has been revised to describe that new potable supply wells placed in impaired waterbodies would be required by law to follow the State Water Resources Control Board, Division of Drinking Water permitting process.

Response to Submission 898 (Kimberly L. Bick, Lockheed Martin Corporation, August 31, 2020) - Continued

898-1779

This comment states that groundwater dewatering within the San Fernando Valley Burbank Operable Unit (BOU) is not expected to be required based on measured depth to groundwater. Additionally, if dewatering of groundwater impacted by volatile organic compounds (VOC) is required, it may not be feasible to treat it at the BOU plant. It is acknowledged that based on historic water levels, groundwater dewatering may not be required in the BOU. As stated in Section 3.8.6.3 of this Final EIR/EIS under Impact HWR #3, based on the historic groundwater levels in the City of Burbank, the below-grade sections are anticipated to be above the groundwater table. However, as discussed in Section 3.8.6.3 of this Final EIR/EIS under Impact HWR #3, not enough groundwater information was available to completely rule out the potential for groundwater to be encountered during tunneling. Therefore, it was conservatively assumed that groundwater dewatering during tunnel construction in the City of Burbank would be required. The project would comply with the requirements of the Los Angeles Regional Water Quality Control Board Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2018-0125, NPDES No. CAG994004). Any groundwater extracted during construction would be tested and treated as required by the permit. For any contaminated groundwater, the water may be collected and off-hauled to a local sanitary sewer for disposal. If contaminated groundwater is disposed of via a local sanitary sewer, the Authority will coordinate with the appropriate jurisdictional agency or entity to obtain the necessary regulatory approvals and permits. Alternatively, an on-site active treatment system may be required to treat the water prior to discharge. It is not anticipated that groundwater would be treated at the BOU treatment plant. No revisions to this Final EIR/EIS have been made in response to this comment.

898-1780

The commenter expresses concern that the HSR Project may impede progress toward to the goals of restoring the aquifer and delivering potable water. The San Fernando Superfund site was identified in Section 3.10 and Appendix 3.10A in the Draft EIR/EIS, and text has been added to the Final EIR/EIS to provide more information and clarity.-- Impacts on the ongoing remediation efforts were analyzed in Impact HWM # 3 in the Draft EIR/EIS, and text has been added to the Final EIR/EIS to clarify and add more information on the Superfund site specifically--Impacts on the extraction/water supply wells were covered in Section 3.6, with clarifying text added to the Final EIR/EIS. The Authority acknowledges the concern about not interrupting the long-term efforts to restore aquifer and deliver potable water and shares that goal, and will implement proven techniques to accomplish the HSR project while protecting the remediation efforts.

Submission 879 (Michael Banner, Los Angeles LDC, August 31, 2020)

Burbank - Los Angeles - RECORD #879 DETAIL

Status : Action Pending
Record Date : 8/31/2020
Submission Date : 8/31/2020
Interest As : Business and/or Organization
First Name : Michael
Last Name : Banner

Stakeholder Comments/Issues :

- 879-1628 | The community of Lincoln Heights needs more time to be adequately briefed on the EIR/EIS impacts included in the draft report. Please extend the comment period until the COVID-19 restrictions are terminated and public in person meetings can be held.
- 879-1629 | Greater details, engineering specifications, beyond the 15% drawings/assessment must be presented in a public meeting with a question and answer session.
- 879-1630 | The equity platform requirements utilized by METRO, considered the local (LA COUNTY WIDE) best practices for community engagement must be offered to the low income community of Lincoln Heights.
- 879-1631 | The noise mitigation benefits are not completely disclosed in the EIR/EIS draft report. It must be made clear who has the authority to request Quiet Zone designation.
- 879-1632 | The new Main Street Bridge will potentially lead to homelessness encampments. The EIR/EIS fails to address this potential problem not does it offer mitigation procedures to protect children attending local schools or visiting the Albion RiverSide Park.

Response to Submission 879 (Michael Banner, Los Angeles LDC, August 31, 2020)

879-1628

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.

879-1629

The commenter requests that greater details, engineering specifications, beyond the 15% drawings be presented in a public meeting with a question and answer session. Detailed plans beyond 15% design are not available at this stage of the HSR project. The Authority will continue to work closely with community stakeholders as the project progresses into final design and construction.

879-1630

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

The comment states that the equity platform requirements used by Metro considered the local best practices for community engagement must be offered to the low income community of Lincoln Heights.

In March 2012, the High-Speed Rail Authority Board adopted a Title VI Program, in May 2012 the Board adopted a Limited English Proficiency (LEP) Policy, and in August 2012 the Board adopted Environmental Justice (EJ) guidance. The adoption of these policies formalized the Authority's long-standing efforts to ensure that no person in the state of California is excluded from participation in, nor denied the benefits of, its programs, activities, and services on the basis of race, color, national origin, age, sex, or disability as afforded by Title VI of the Civil Rights Act of 1964 and related statutes.

As described in Section 5.4.2 of this Final EIR/EIS, substantial low-income and minority populations are found in parts of the Lincoln Heights community. Therefore, the EJ analysis in Section 5.4.6 takes into consideration the HSR Project's potential for its actions to have disproportionately high and adverse environmental and health impacts on low-income and/or minority populations in Lincoln Heights.

To understand the potential impacts, there has been an extensive public and agency outreach program to provide opportunities for public involvement throughout the EIR/EIS process. EJ-related meetings were held with local officials; public, local and regional organizations; and government agencies, as well as with representatives from affected communities, as shown in Table 5-8, Burbank to Los Angeles Project Section Environmental Justice Targeted Outreach Activity (August 2015–December 2018), in Chapter 5, Environmental Justice. As shown in Table 5-8, outreach activities with the Lincoln Heights Neighborhood Council Area were conducted on July 21, 2016, and October 18, 2018. The Authority's outreach efforts are ongoing, and outreach to minority and low-income populations will continue throughout the HSR Project to ensure that these communities have the opportunity to comment on the project as described in Section 5.5 of this Final EIR/EIS. Chapter 9, Public and Agency Involvement, includes detailed information on the numerous opportunities for participation that have taken

Response to Submission 879 (Michael Banner, Los Angeles LDC, August 31, 2020) - Continued

879-1630

place. The purpose of these efforts was to gain the input of minority and low-income populations regarding the project and to obtain their comments as part of the public record, and so the analyses and conclusions in this EIR/EIS accurately reflect the setting and potential impacts of the project in those communities.

The Authority has adopted a Title VI Program, Limited English Proficiency (LEP) Policy and Environmental Justice (EJ) guidance which address equity throughout the HSR System, including the Burbank to Los Angeles Project Section. Similar to Metro's Equity Platform, the Authority's adopted policies would foster meaningful community engagement to address equity. Therefore, the Authority does not intend to apply Metro's Equity Platform Principles in implementing the project.

879-1631

The commenter requests clarification on who has the authority to request Quiet Zone designation. Designation of quiet zones is not part of the HSR Build Alternative. Quiet zones are considered by the FRA upon receipt of a request from public agencies. Information is available on the FRA website at <https://railroads.dot.gov/elibrary/how-create-quiet-zone>.

879-1632

The Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) did not evaluate the project's potential to complete infrastructure that could foster people experiencing homelessness (PEH) encampments, and it is not required to do so. 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 purely 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. As described in the Project Description, the HSR alignment would be fully enclosed/fenced to prevent human and wildlife intrusion.

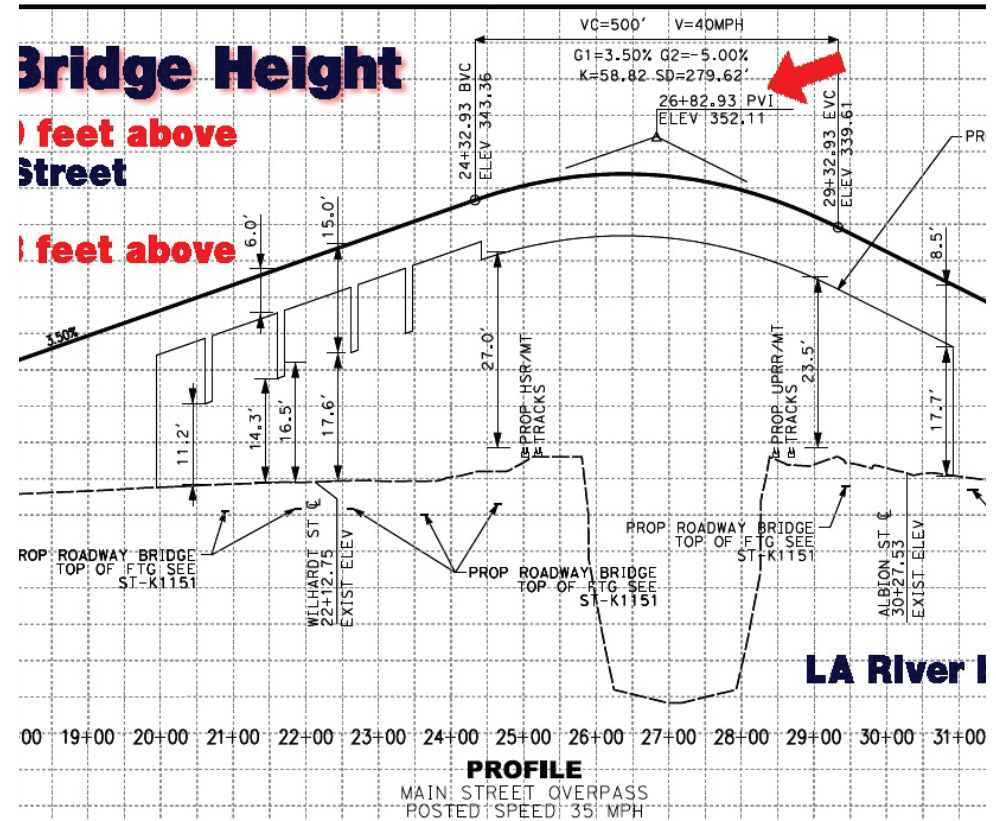
The roadways under the new grade separations and the area under the historic Main Street bridge, which will remain in place, could be used by PEH. However, any legal enforcement would be the responsibility of those agencies that have jurisdiction of those roadways.

Submission 853 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020)

Burbank - Los Angeles - RECORD #853 DETAIL	
Status :	Action Pending
Record Date :	8/25/2020
Submission Date :	8/25/2020
Interest As :	Business and/or Organization
First Name :	Michael
Last Name :	Banner
Attachments :	MainStreetBridgeOverPassGraphic.pdf (408 kb)
Stakeholder Comments/Issues :	

853-1556

The Historic Main Street Bridge could attract encampments much like exist today with freeway underpasses through LA. What mitigations, if any, are legally possible? Has the LA City Attorney been consulted with?



Response to Submission 853 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020)

853-1556

The commenter states that the Historic Main Street Bridge could attract encampments similar to what exists under freeway underpasses throughout Los Angeles and questions if mitigation is possible.

The Draft EIR/EIS did not evaluate the project's potential to construct infrastructure that could foster people experiencing homelessness (PEH) encampments, and it is not required to do so. 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 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 would remain in place, and could be used by PEH. However, any legal enforcement would be the responsibility of those agencies who have jurisdiction of those roadways.

Submission 854 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020)

Burbank - Los Angeles - RECORD #854 DETAIL

Status : Action Pending
Record Date : 8/25/2020
Submission Date : 8/25/2020
Interest As : Business and/or Organization
First Name : Michael
Last Name : Banner

Stakeholder Comments/Issues :

854-1557

Having shading studies been performed for any shadowing caused by the height of the new Bridge; especially, over the Albion RiverSide park?

Response to Submission 854 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020)

854-1557

The commenter asks if studies have considered potential shadows in the vicinity of the Main Street bridge. No shading studies were prepared for any of the new structures proposed under the HSR Build Alternative. The Main Street grade separation would add a nominal amount of shadow to the far south corner of the six acre park. As discussed in Section 3.15.6.3, this portion of the park includes a cell tower and has limited use for recreation. Additionally, the visual simulation for KVP 20 illustrates that by introducing a new elevated feature in the viewshed (road overcrossing), the HSR Build Alternative would introduce a high visual change in the area. The Draft EIR/EIS stated that the new elevated feature would introduce a new raised structure in the cultural environment.

The Main Street Bridge would be designed to reduce intrusiveness to viewer groups, as stated in the Draft EIR/EIS. Moreover, AVQ-IAMF#1 (Aesthetic Options) requires that the Authority design HSR non-station structures consistent with the local aesthetic context. This IAMF will be implemented throughout the design of the proposed project.

Submission 855 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020)

Burbank - Los Angeles - RECORD #855 DETAIL

Status : Action Pending
Record Date : 8/25/2020
Submission Date : 8/25/2020
Interest As : Business and/or Organization
First Name : Michael
Last Name : Banner
Attachments : MetroEquityPlatformPresentation2018.pdf (931 kb)

Stakeholder Comments/Issues :

Metro is collaborating with HSR and in moving forward with its Link US project. While METRO has adopted an Equity Platform which includes: . I. Define and Measure

II. Listen and Learn

III. Focus and Deliver

IV. Train and Grow

continuing my question: Has HSR adopted any of METRO's Equity Platform principles? If not why?

855-1558



Submission 855 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020) - Continued

Metro Equity Platform Framework

Access to opportunity: a core concept to public decision-making, public investment, and public service

- Vast disparity exists in LA County among neighborhoods and individuals:
 - To seize opportunity – jobs, housing, education, health, safety;
 - To improve their circumstances to drive economic growth
- Transportation is an essential lever to enable that access.



Metro Equity Platform Framework

Why an Equity Platform now?

- As a transportation leader, Metro can and should address disparities.
- Metro has already signaled a change:
 - Measure M: performance metric considerations
 - New Long Range Transportation Plan committed early to Equity
 - Recent, targeted community collaboration (First/Last Mile, Rail to Rail grant effort)
- Exploratory outreach to LA County equity thought leaders



Submission 855 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020) - Continued

Metro Equity Platform Framework

Multi-point Equity Platform built around four pillars:

- I. Define and Measure
- II. Listen and Learn
- III. Focus and Deliver
- IV. Train and Grow



Metro Equity Platform Framework

I. Define and Measure

Need a common basis to build an equity agenda

- “Equity” holds different perspectives and priorities—many.
- Inequity → fundamental differences in access to opportunity
- Race and Class—historically and currently—predominate disparities in LA County
 - Concentrated in poor, minority communities
 - Age, gender, disability, and residency also can expand or constrain opportunities



Submission 855 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020) - Continued

Metro Equity Platform Framework

I. Define and Measure (cont.)

- Pursue an inclusive conversation that commi
 - Establish meaningful goals around a sha definition of equity – and actions to achie those goals;
 - Define metrics to evaluate outcomes, inc investment decisions;
 - Ensure consideration at the front end, nc back end;
 - Seek out and involve the diverse range of voices that must collaborate on above.



Metro Equity Platform Framework

II. Listen and Learn

- Establish comprehensive, multiple forums to engage th community meaningfully and actively in defining, measuring and acting on equitable outcomes.
- Open the conversation with LA's community members to address:
 - where achieving equity has been problematic broadly, and specific to transportation;
 - where improved relationships, partnerships a actions can advance more equitable transportation outcomes going forward.



Submission 855 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020) - Continued

Metro Equity Platform Framework

II. Listen and Learn (cont.)

- Recognizing past experience provides foundation for a different future.
- Community-driven conversation is essential.
 - Seek best practices.
 - Establish distinct advisory body for the equity agenda.
 - Engage CBOs in community outreach and problem solving.
 - Build local government technical capacity serving historically underserved communities.



Metro Equity Platform Framework

III. Focus and Deliver

The Long Range Transportation Plan is unifying activity with major crosscutting Equity arenas:

- Where Metro Leads
 - Transportation planner, operator, builder and funder
 - Performance-based investment decisions that:
 - a) advance outcomes to promote and sustain equity opportunities;
 - b) avoid outcomes that aggravate disparities in equity opportunity;
 - Operating/maintaining the system impacts equity as much as infrastructure investments.



Submission 855 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020) - Continued

Metro Equity Platform Framework

III. Focus and Deliver (cont.)

- Where Metro **Partners**
 - Beyond Metro’s core transportation responsibilities—Land Use
 - Gentrification/displacement/affordable housing
 - An urgent issue in every corner of the city
 - Metro cannot address alone—Partners: essential: local government, business, community advocates, foundations



Metro Equity Platform Framework

IV. Train and Grow

A new equity agenda requires “top-to-bottom” ownership throughout the agency.

- Training in two important areas:
 - Methods to evaluate equity including data collection, measurement and analysis;
 - Approaches to effectively communicate and work with communities with priority and respect for equity issues.



Submission 855 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020) - Continued

Metro Equity Platform Framework

Next Steps

- The Equity Platform is a framework.
- It intends to shape specific analyses and actions forward.
- Experience may redirect and improve the platform.
- The PAC is an essential touchstone for input and checkpoint for progress.
- Presentations to the Metro Board are key.



Thank you



Response to Submission 855 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020)

855-1558

The comment questions if HSR has adopted any of Metro's Equity Platform principles.

In March 2012 the High-Speed Rail Authority Board adopted a Title VI Program, in May 2012 the Board adopted a Limited English Proficiency (LEP) Policy, and in August 2012 the Board adopted Environmental Justice (EJ) guidance. The adoption of these policies formalized the Authority's long-standing efforts to ensure that no person in the state of California is excluded from participation in, nor denied the benefits of, its programs, activities, and services on the basis of race, color, national origin, age, sex, or disability as afforded by Title VI of the Civil Rights Act of 1964 and related statutes.

The LEP Policy articulates the Authority's policy to communicate effectively, with respect, and to provide meaningful access to limited English proficient (LEP) individuals to all the Authority's programs, services, and activities. Consistent with the Authority's LEP Policy, the Authority has provided free language assistance services to LEP individuals encountered during public outreach or whenever requested by LEP individuals.

The EJ guidance articulates the Authority's position that fair treatment of people of all races, cultures, and income, is incorporated into all of the Authority's programs, policies and activities, and in particular during the development and evaluation of the environmental documents (under CEQA/NEPA). The EJ guidance seeks to both evaluate and mitigate disproportionately high and adverse impacts, particularly on minority and low-income populations that may occur as part of the Authority's activities and business.

As such, the Authority has adopted a Title VI Program, Limited English Proficiency (LEP) Policy and Environmental Justice (EJ) guidance which address equity throughout the HSR System, including the Burbank to Los Angeles Project Section. Similar to Metro's Equity Platform, the Authority's adopted policies would foster meaningful community engagement to address equity. Therefore, the Authority does not intend to adopt Metro's Equity Platform Principles.

Submission 856 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020)

Burbank - Los Angeles - RECORD #856 DETAIL

Status : Action Pending
Record Date : 8/25/2020
Submission Date : 8/25/2020
Interest As : Business and/or Organization
First Name : Michael
Last Name : Banner

Stakeholder Comments/Issues :

856-1559 | Negative impacts to business along North Main Street are highly likely during construction and potentially thereafter. Since METRO is a major beneficiary on this grade separation, METRO has utilized a Business Interruption Fund to assist small businesses. Will HSR consider its own Business Interruption Fund? Finally, 856-1560 | you have several large businesses with many employees have you considered a method to mitigate business losses

Response to Submission 856 (Michael Banner, Los Angeles LDC - Lincoln Height Business Association of Los Angeles, August 25, 2020)

856-1559

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

This commenter states that negative impacts to business along North Main Street are highly likely during construction and potentially thereafter. The commenter asks if the Authority is considering a program like Metro's Business Interruption Fund.

The Authority understands that construction of the HSR system would affect private property owners. In light of this fact, the Authority has committed to educate, inform, and work collaboratively with affected property owners. Please refer to the Authority's website for additional resources for affected property owners:

https://hsr.ca.gov/programs/private_property/.

Property owners who believe they have suffered a loss may file a claim with the State of California Government Claims Board. More information may be obtained online at <https://www.dgs.ca.gov/ORIM/Services/Page-Content/Office-of-Risk-and-Insurance-Management-Services-List-Folder/File-a-Government-Claim>

856-1560

The commenter states that several large businesses with many employees would be affected and questions if the Authority has considered a method to mitigate business losses.

Refer to Response to Comment 856-1159, contained in this chapter.

As discussed under Section 3.12.6.3, Impact SOCIO #4 of this Final EIR/EIS, IAMFs would be incorporated as part of the HSR Build Alternative design to help avoid and minimize impacts. As discussed in Section 3.12.4.2,

Implementation of SOCIO-IAMF#2 and SOCIO-IAMF#3 would provide relocation assistance to all persons displaced by the HSR Build Alternative in compliance with the Uniform Act and establish an appraisal, acquisition, and relocation process in consultation with affected cities, counties, and property owners.

Submission 651 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 23, 2020)

Burbank - Los Angeles - RECORD #651 DETAIL

Status : Action Pending
Record Date : 6/23/2020
Submission Date : 6/23/2020
Interest As : Business and/or Organization
First Name : Michael
Last Name : Banner

Stakeholder Comments/Issues :

651-719

My name is Michael Banner. My phone number is 213-448-8043. Again Michael Banner 213-448-8043. I noticed from the website electronic copies of tier one documents are available by calling this number and I'd like to request electronic copies. I'm assuming that means PDF it could be sent to me via email M-B-A-N-N-E-R at Los Angeles spelled all the way out, Lincoln David Charles.com. Again that's mbanner@losangelesldc.com. Appreciate a return phone call just to confirm you received my request.

Response to Submission 651 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 23, 2020)

651-719

The commenter requested an electronic copy of the Draft EIR/EIS. On June 9, 2020, the commenter was directed to the online version of the Draft EIR/EIS. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020)



Burbank - Los Angeles - RECORD #657 DETAIL	
Status :	Action Pending
Record Date :	6/26/2020
Submission Date :	6/26/2020
Interest As :	Business and/or Organization
First Name :	Michael
Last Name :	Banner
Attachments :	LDC HSR Request to Postpone EIR EIS Letter 06252020-tmi.pdf (53 kb) ULI LA North Broadway TAP Report 2018 .pdf (3 mb)

June 25, 2020

California High Speed Rail Authority
 770 L. Street, Suite 620
 Sacramento, CA 95814
info@hsr.ca.gov

California High Speed Rail Authority
 355 S. Grand Avenue, Suite 2050
 Los Angeles, CA 90071
Southern.california@hsr.ca.gov

To California High Speed Rail Authority:

657-675

Stakeholder Comments/Issues :

For your immediate consideration. The Lincoln Height North Broadway Corridor will be impacted by construction for the HSR.

Michael Banner

Los Angeles LDC, Inc.

1010 Wilshire Boulevard, Suite 807

Los Angeles, CA 90017

Phone# 213-362-9113

www.losangelesldc.com

657-676

We would like to request an extension of the deadline to respond to the EIR/EIS for the Los Angeles Project Section Draft Environmental Report/Environmental Impact Statement public comment phase.

We are requesting this extension until 90 days after the moratorium on public locations is lifted on January 31, 2021.

657-677

The Los Angeles LDC ("LDC") is a property owner at 1782 – 1786 North Spring Street, Los Angeles, CA 90031; additionally, we are one of the 202 property owners/members in the Lincoln Heights Benefit Association of Los Angeles ("BID"). We, like other property owners, along the North Broadway corridor, may not have been made aware of the release of this draft EIR/EIS nor have we been able to review the report. Given the magnitude of this High Speed Rail project, it is very possible that many of the low income Lincoln Heights community residents may not have on line access to view all the necessary documents. In our view, many in the Lincoln Heights community suffer from "digital divide" issues and access to the EIR/EIS documents through the Public Libraries might be the reasonable option for many; however, the Public Libraries have been closed due to COVID-19.

520 N. LA BREA AVE., STE. 108, INGLEWOOD, CA 90302
 OFFICE: (800) 366-1178
WWW.LOSANGELESLDC.COM

Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

California High Speed Rail Authority
June 25, 2020
Page 2

657-678

As a non-profit community development organization, we consider this HSR project has great potential for direct and indirect impacts in the Resource Study Areas affecting Lincoln Heights; furthermore, we believe that outreach and easy access to this information is critical. At this date, we believe all affected stakeholders (RAS) do not have access to the report, internet, or the ability to view this report in a language they speak.

657-679

As a property owner and BID board member, we need an appropriate amount of time to communicate with our property owners, members, tenants, and community stakeholders to insure that they are informed of the EIR/EIS and its analysis of the direct and indirect impacts.

We ask you to postpone the virtual public hearing scheduled for July 8th, 2020.

We were made aware of this release on June 23, 2020 and strongly urge the HSR Board and staff to consider this request.

Sincerely,



Michael Banner
President and CEO

Enclosures

CC: Steve Kasten LHBALA
Richard Larsen LHNC
Michelle Boehm HSR



A ULI ADVISORY SERVICES TECHNICAL ASSISTANCE PANEL REPORT

NORTH BROADWAY CORRIDOR

NOVEMBER 2018



Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

ULI MISSION STATEMENT

At the Urban Land Institute, our mission is to provide leadership in the responsible use of land and in creating and sustaining thriving communities worldwide.

ABOUT ULI TECHNICAL ASSISTANCE PANELS

In keeping with the Urban Land Institute mission, Technical Assistance Panels are convened to provide pro-bono planning and development assistance to public officials and local stakeholders of communities and nonprofit organizations who have requested assistance in addressing their land use challenges.

A group of diverse professionals representing the full spectrum of land use and real estate disciplines typically spend one day visiting and analyzing the built environments, identifying specific planning and development issues, and formulating realistic and actionable recommendations to move initiatives forward in a fashion consistent with the applicant's goals and objectives.

PANEL MEMBERS AND STAFF

TAP CLIENTS

Los Angeles LDC, Inc.
The Lincoln Heights Leadership Group

PANEL CHAIR

Cecilia Estolano
Estolano LeSar Advisors

PANELISTS

Andrew Fogg
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Mural at Lincoln Heights Recreation Center

Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

EXECUTIVE SUMMARY

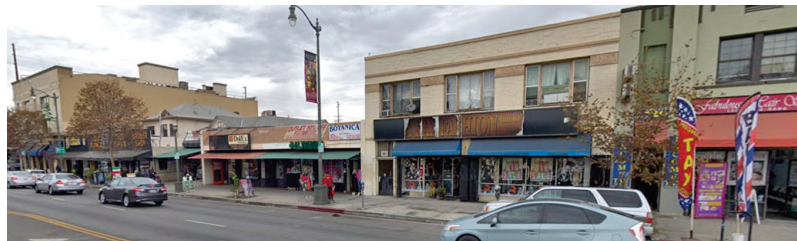
ASSIGNMENT AND PROCESS

One of Lincoln Heights's most unique characteristics is the small town feel of its North Broadway corridor, which is made even more special by the neighborhood's location just beyond the boundaries of Downtown Los Angeles.

The charms of North Broadway are in part a result of the corridor's history as the streetcar route for the oldest suburb in Los Angeles. That history gives the neighborhood the "good bones" of pedestrian scale and beautiful historic buildings.

The neighborhood's charms also stem from the active public life of a multi-generational community. The entrepreneurialism of the residents and business owners who live and work in Lincoln Heights matches a communitarian spirit that makes Lincoln Heights entirely unique in the city of Los Angeles.

The Broadway Corridor sits along the historic Route 66. The corridor is lined with a low-scale pre-WWII buildings and a mix of small businesses.



2 NORTH BROADWAY CORRIDOR Technical Assistance Panel

While Lincoln Heights is a gem, it's not entirely hidden. Rapid development in Downtown Los Angeles has spread north and east, to neighborhoods like Chinatown and Boyle Heights. Concerns about gentrification and displacement of the existing community have followed new housing developments and large public investments, like along the Los Angeles River. Ongoing investments in the Metro light rail system and technological advancements with app-based personal transportation are changing the mobility equation for Lincoln Heights residents, allowing new ways to explore and enjoy the neighborhood and access to more of the region's jobs and destinations.

Lincoln Heights is located on the doorstep of one of the fastest growing industries in the region. Nearby, major regional employers like the Los Angeles County+USC Medical Center and the USC Health Sciences Campus are expanding quickly, providing employment opportunities across a wide spectrum of career and income levels. There are also plans for a biotech corridor along Valley Boulevard nearby.

The Los Angeles Local Development Corporation and the Lincoln Heights Leadership Group engaged Urban Land Institute – Los Angeles (ULI) to undertake a Technical Advisory Panel (TAP) that would synthesize the underlying challenges and opportunities arising in the corridor as redevelopment investments are proposed along the North Broadway corridor. The TAP has been tasked with proposing solutions that will spur health and wealth in the corridor without displacing the existing community.

KEY QUESTIONS

The Leadership Group posed a number of questions to the ULI to set a scope of work for the TAP process.

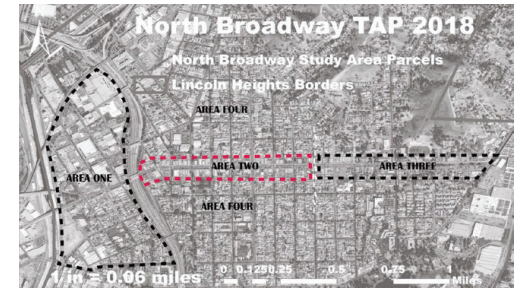
The TAP examined an area extending along North Broadway from the Los Angeles River to the west and Mission Street to the east. The study area also included the surrounding residential neighborhoods and the landmarks of the Lincoln Heights neighborhood, like the Los Angeles County+USC Medical Center and Lincoln Park.

Market Forces and Position

1. Evaluate the current retail market and identify any recent shifts in retail positioning along the North Broadway corridor. What is the likely future retail market position for this area?
 - a. What is the demand for new retail, potentially including national, regional, and local retailers, and how can the North Broadway corridor accommodate new retail? How can this market be best positioned to attract new investment in the area?
 - b. How can the corridor retain and sustain existing businesses and engage the surrounding community for future opportunities?
2. What are the parking capacity and demand issues and needs based on anticipated development, including potential reuse of existing public lots for housing or other uses?

Public Realm

3. What type of streetscape improvements can enhance and promote pedestrian activity along the North Broadway corridor? How can corridor partners facilitate the execution of these improvements?
4. The Lincoln Heights community will benefit from the improvements at the Albion Riverside Park, meeting the needs of youth for recreational activities. The park is slated for completion in the first quarter of 2019. What are the options for integrating and connecting the corridor to Albion Riverside Park?



Boundary map for North Broadway corridor

Financing

5. What financial tools and funding partners are available to fund streetscape, branding, and public realm improvements for the short- and long-term?

Proximity to Anchor Institutions

6. The University of Southern California's Health Sciences Campus is located just to the southeast of the corridor. How can the North Broadway corridor leverage its proximity to that campus, including enhancing physical connectivity, to become an anchor for the institution that drives greater commercial activity along the corridor?

Branding

7. What short-term steps could the corridor partners take to create a North Broadway Corridor brand for streetscape, signage, and store frontage to unite their respective constituents, properties, and business owners? What should be considered over the long term? Are there any organizations, other than a business improvement district, that could oversee and ensure the execution of a North Broadway corridor brand?

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MAJOR CONCLUSIONS AND RECOMMENDATIONS

All of the recommendations included in this report are designed to spur health and wealth in the community of Lincoln Heights—without displacing existing residents and business. These recommendations are about shaping the future of Lincoln Heights on terms defined by the community of Lincoln Heights.

The TAP believes that investments can be made while preserving the best qualities of the community, providing opportunities for retail that might still be needed in this area and adding the housing necessary to continue the neighborhood's tradition as a multi-generation community.

Change comes—it's always coming. The TAP report is written to empower the Lincoln Heights community to shape that change. Only by taking control and getting ahead of that change will this community protect the integrity of Lincoln Heights. The people of Lincoln Heights must determine how the community will change.

If the development and gentrification pressures continue to build in and around Lincoln Heights, eventually change will wash over the neighborhood in a way that isn't as beneficial to the existing community.

To achieve a balance of growth and investment, while preserving the community and charms of Lincoln Heights, the TAP recommends land use and zoning changes that would amend the Cornfield Arroyo Specific Plan (CASP), the Lincoln Heights Preservation Overlay Zone, and the existing "Q Conditions" that limit development along North Broadway. These land use regulation changes should be specifically targeted to produce workforce and middle-income housing opportunities. These programs would represent novel approaches to housing policy in the city of Los Angeles, but the TAP believes these reforms are necessary to control increasing rents and to provide new apartments and homes for the next generation of Lincoln Heights residents—the children and grandchildren of existing residents who otherwise won't be able to come home after concluding their studies and entering the workforce.

The Lincoln Heights community needs housing options that offer its children and grandchildren opportunities to enter the middle class, and to remain members of the community in which they were raised.

The TAP recommends a series of urban design improvements in the public realm to enhance North Broadway's existing strengths as a thriving pedestrian and commercial corridor. With the addition of the Albion Riverside Park, there are opportunities to connect to the commercial corridor and offer easy access to the park for residential communities. These improvements could contribute significantly to the quality of life of current residents.

The TAP addresses needs in terms of access—like parking, public transit, and new ride-hailing and ride-sharing technologies. The TAP suggests replacing existing parking when new developments are built, but also notes that the corridor already has sufficient supply to serve the existing demand along the North Broadway Corridor. Improved first and last mile connections to employment centers and the Lincoln/Cypress Station on the Metro Gold Line could

increase the number of customers accessing the commercial corridor while also providing quality of life and economic mobility improvements for the existing community. The TAP recommends an approach to branding and community engagement campaigns that will attract and retain the right kind of local investors and earn the buy-in of local residents and business owners. Community engagement processes in Lincoln Heights should include the community at every step in the process to ensure that investments come from within the community, and benefit the community first and foremost. The passions of people who know Lincoln Heights the most intimately must be heard to achieve these principles.

Finally, the TAP also recommends a strategic and incremental approach to achieving this ambitious vision for the North Broadway corridor, and the Lincoln Heights community.

The freeway is a physical barrier that separates Area One.

ULI convened a panel of professionals representing a variety of disciplines connected to land use and real estate development such as architecture and urban design, real estate development, economic analysis, marketing, and development financing.

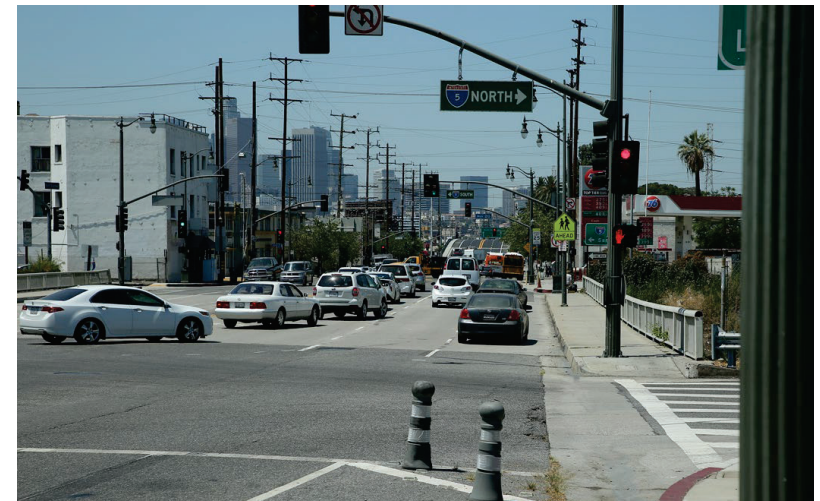
North Broadway Corridor TAP

Thursday, August 2 and Friday, August 3, 2018



Urban Land Los Angeles Institute

North Broadway Corridor TAP



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ULI'S TECHNICAL ASSISTANCE PANELS

TAP PROCESS

Prior to the TAP, ULI panel members met with representatives from the North Broadway Leadership Group (led by Michael Banner, president and CEO of the Los Angeles LDC, Inc.) to determine the scope of the panel assignment. ULI selected panel members with practiced and professional skills that address the stated objectives for the TAP. Panel members reviewed background materials prepared by Leadership Group staff prior to the TAP, including market and demographic data, economic data, the Cornfield Arroyo Specific Plan, the Northeast Los Angeles Community Plan, the Lincoln Heights Community Design Overlay District Ordinance, the Lincoln Heights Historic Preservation Overlay Zone, transit routes through the area, and development plans for large investments in locations, like the Los Angeles River, the Albion Riverside Park, the USC Health Sciences Campus, and the "Affordable Housing Opportunity Sites" proposed by the city of Los Angeles for locations in Lincoln Heights.

Stakeholder interviews are a key component of the TAP process.



Given the desire of the Leadership Group for a thorough study of the opportunities presented by the study area, this TAP lasted for two days. On the first day, panel members toured the study area by van with Michael Banner and team members from the Los Angeles LDC, Inc. The TAP also met with local business owners, community members, and representatives from a large collection of city departments. On the second day, panelists worked through an intensive analysis of the specified issues before presenting their findings at a public event attended by members of the community and the Leadership Group.

THE EXPERTS OF THE TECHNICAL ASSISTANCE PANEL

ULI convened a panel of professionals representing a variety of disciplines connected to land use and real estate development, including architecture and urban design, real estate development, transportation, economic analysis, development financing, branding, and community engagement. The ULI panel members brought professional expertise relevant to the Leadership Group's objectives for the study and a working knowledge of the real estate market, design typologies, regulatory schemes, and transportation engineering found in the study area. All panel members volunteered to participate in the panel process and did not receive compensation for their work.

OBSERVATIONS

BACKGROUND AND CONTEXT

From an engineer's perspective, the four lanes of North Broadway provide passage for 25,000 cars per day*. But for residents of Lincoln Heights, and aficionados of the unique cultural history of the city of Los Angeles, North Broadway is much more than just a way for cars to pass through Lincoln Heights. The street—including its sidewalks, public realm, and the businesses that line the corridor—forms the heart of one of Los Angeles' most uniquely historic and beautiful neighborhoods.

Lincoln Heights is the original streetcar suburb of Los Angeles—a heritage that is obvious in the grid and patterns of the neighborhood, as well as the low-scale development and the pedestrian orientation of the streets. The age of the buildings along the North Broadway corridor is a highly sought after characteristic of desirable neighborhoods in the contemporary United States—the buildings and street have "good bones," as planners and developers like to say. Given that the majority of buildings were built before World War II, many buildings are likely to need upgrades, but the bones and the scale of the neighborhood are a major benefit to the community. Many neighborhoods in the city and around the country would envy this kind of built environment. This authenticity of Lincoln Heights cannot be faked.

Lining each side of North Broadway is a mix of small businesses and name brands, mom and pop restaurants and cafes, national fast food chains, a high school, an elementary school, national drug stores, and four major banks. A lot of what the community wants and needs is already provided at a local scale—that local scale fits for this community.

But recent trends have begun to pressure businesses, and concerns about being priced out of the corridor are growing. Residents and business owners worry that more investment could bring more gentrification and displacement. Initiatives like the Spring Street Bridge renovation, the new Albion Riverside Park renovation, the Lincoln Heights Jail adaptive reuse, and the Los Angeles River Revitalization Master Plan are signs of hope to some. To others, these projects are harbingers of increasing rents and, inevitably, displacement.

Moreover, the city of Los Angeles is moving forward on plans to build five affordable housing projects on city-owned parking lots adjacent to the heart of the corridor. Many local business owners fear the loss of parking could depress economic growth.

Essential demographic characteristics of the Lincoln Heights community include its primarily Latino and Asian heritage and its relatively low income levels (the media household income in the area was approximately \$38,900 in 2018, according to Esri Business Analyst). The community is deeply rooted—residents and employees know each other personally, and each other's families, creating a feeling of connection that is hard to match anywhere else in Los Angeles.

Elysian Park Rail Car Map (1920's)



* Los Angeles Department of Transportation traffic count at N Broadway and Gates Street, October 28, 2015

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The North Broadway Corridor.

In that context of strong community ties, rising rents are perceived as a major threat to Lincoln Heights. The fear of displacement looms over many of the communities of color and low-income residents in Los Angeles, and particularly neighborhoods near Downtown. Significant outside investment is already flowing into nearby neighborhoods, and Lincoln Heights residents already feel rent pressure. Talk of additional investment and development provokes more fear about change.

Lincoln Heights is also presented with rare opportunities for inclusive economic development, based on its location adjacent to the LAC+USC Medical Center and USC Health Sciences Campus Healthcare. USC, the county and city of Los Angeles, and others have outlined ambitions for a “bioscience corridor” along Valley Boulevard. Medical services and bioscience research are some of the biggest and fastest growing fields in the county. Those institutions and industries offer several pathways for mid-level jobs—not just for PhDs and MDs. Residents attending community college can receive AA degrees or career technical certificates, gaining ready access to careers as lab techs, facilities managers, and more. These careers offer a path to the middle class, and these opportunities are located right on the doorstep of Lincoln Heights.

Another opportunity for inclusive economic development comes from the neighborhood’s location proximate to Downtown and the region’s light rail transit system. Lincoln Heights residents are a short bus or train ride from jobs centers located all over the region.

The study area examined by the TAP is quite large, stretching along the axis created by North Broadway from the Los Angeles River to the west and Mission Street to the east. The study area also included the surrounding residential neighborhoods, and the landmarks of the Lincoln Heights neighborhood—the Los Angeles County+USC Medical Center and Lincoln Park. Given the distinct communities within Lincoln Heights, the TAP approached the assignment by splitting the study area into four sub-areas.

This report refers to Area One, which is the neighborhood stretching from the Los Angeles River to the I-5 Freeway. This part of Lincoln Heights has a different feel and has a different set of zoning rules, as established by the Cornfield Arroyo Specific Plan (CASP).

Area Two stretches along North Broadway to the east until Eastlake Avenue. Area Two—what the TAP refers to as “The Heart” of the Lincoln Heights community—is where the majority of activity occurs on the corridor, with a farmers’ market and linkages to the major employers along Daley Street and Griffin Avenue.

Area Three is located farther east along North Broadway, where there is less retail and fewer linkages, but there are unique opportunities for development. In Area Three, the TAP envisions a more vibrant community, distinctive as a “gateway” to draw people to the heart of Lincoln Heights.

Finally, the TAP identified Area Four as the surrounding residential community, which provides the demand for the commercial businesses on the corridor and houses the existing, multi-generational community. If the retail corridor is going to change, changes must be made in service of the aspirations of the people who live in these surrounding residential neighborhoods.

MARKET ANALYSIS

In performing a market analysis, the TAP focused mostly on the retail market along North Broadway, but also touched on a few other property types found in the wider Lincoln Heights neighborhood.

There are just under 40,000 people living in Lincoln Heights. Nearly 75 percent of that population rents, rather than owns, their homes. The median age of the population skews young, at about 33 years old. The neighborhood’s income levels are also a bit below the median income for the city as a whole. The median income for Lincoln Heights residents is just under \$40,000 a year. (The TAP notes, however, that the income figure comes with a disclaimer: due to the strong informal economy in Lincoln Heights, some of that income data might be underreported.)

One feature that stands out about the Lincoln Heights real estate market is the astronomically high occupancy rate along the North Broadway corridor. A residential market in equilibrium, or “stabilized,” is usually defined by about 95 percent occupancy. For other product types—like retail, office, and more—equilibrium averages roughly 90 percent occupancy.

Across all property types in Lincoln Heights, the occupancy rate is above 97 percent. The retail spaces in Lincoln Heights are achieving occupancy rates over 99 percent, meaning that almost every available storefront is filled. When vacancies do occur, they are filled quickly. Local retail is in high demand.

Another noticeable trait of the neighborhood is the small lot sizes. With few exceptions, the retail buildings along the North Broadway corridor are just a few thousand square feet in size. Small lot sizes pose a challenge for investment in assembling useable parcels. If a developer needs 10,000 square feet,



they will either have to cross their fingers and hope for a vacancy of the one or two buildings that are that large, or they must piece together multiple parcels. That kind of assemblage can be difficult, expensive, and time consuming.

The small lot size of local businesses creates unique challenges.

The North Broadway corridor’s real estate market is also fairly fragmented. Along the corridor are more than 176 parcels, 134 landowners, and 143 buildings. That many individual owners can create additional difficulties in parcel assembly, as well as in building coalitions or partnerships that can free up additional space.

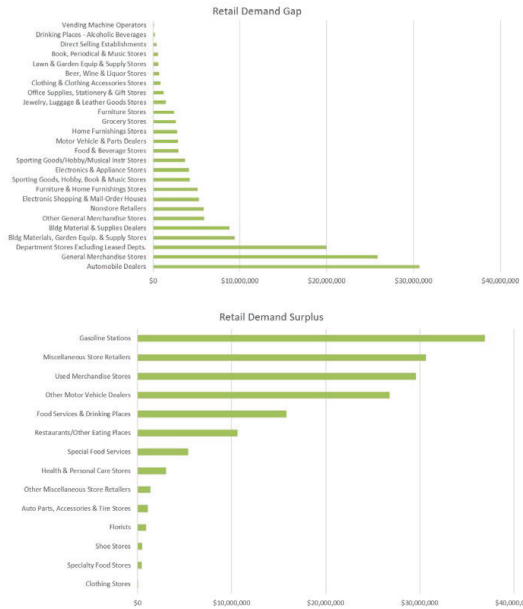
The majority of these buildings are quite old, with an average age of approximately 80 years, with many structures built before World War II and some even before the beginning of the 20th century. Some of the aged buildings in the neighborhood have been well maintained; others have not and will require significant capital expenditures to upgrade

Market analysis demographics and existing inventory.

Metric	1 mile	3 mile	5 mile
Population	34,553	338,212	1,011,933
Households	9,401	103,356	334,057
Average Household Size	3.60	3.10	2.94
% Renters	74.8%	70.6%	73.4%
Median Age	33.1	34.1	34.8
Median Income	\$38,930	\$41,429	\$44,488

Product Type	Inventory SF (units)	# of Buildings	Occupancy	Avg. Rent \$/SF (/unit)	Avg. Building Area	Avg. Lot Area	Avg. Year Built	Avg. Building Age
Industrial	5,293,931	146	97.8%	\$0.79	6,154	14,605	1967	51
Retail	1,380,143	214	99.2%	\$3.15	7,000	12,746	1952	66
Office	890,730	46	96.8%	\$2.56	6,328	7,552	1925	93
Multifamily	3,471	258	97.5%	\$1,263.25	3,503	6,511	1913	105

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Market analysis of the existing retail and unmet demand.

and modernize the buildings. Adding to the challenges of assemblage and redevelopment in the North Broadway corridor is a relative lack of transaction liquidity. There have only been three institutional (i.e., over \$2.5 million) transactions in the past 18 years, with few deals of smaller size, both in terms of building size and dollar amount, and few off-market deals in the area. Properties don't change ownership very frequently along the North Broadway corridor. When people are not selling buildings, it means there also have not been as many opportunities to renovate buildings to keep them current with contemporary standards for infrastructure like water, electricity, internet, and seismic safety.

Focusing specifically on the existing local retail offerings, many industries are already present in the North Broadway study area. There is a lot of miscellaneous retail—i.e., general merchandise retailers like Dollar Stores, 99 Cent Stores, or off-brand convenience stores that sell anything from soap to Cheetos. There are also many food establishments, but the distribution in terms of quality lacks balance. There is a lot of fast food, but minimal fresh or healthy fare. Even though there are already many fast food establishments, the market has room for additional food establishments of a broader variety in the area.

In terms of unmet demand, there is a relatively long list of categories that could find demand in the local community. The TAP does not suggest that a large mall, with national tenants like 24-Hour Fitness or Nordstrom, is a good fit for the neighborhood. But there is a place for independent retailers, like beauty salons, coffee shops, gyms, health services, hobby stores, or bookstores. These kinds of businesses can fit into buildings with a smaller footprint and serve the local community. These businesses are easily run independently and can serve as effective substitutes for national chains, allowing local residents to retain their entrepreneurial spirit as they serve their neighbors in Lincoln Heights.

There are gaps in the existing retail that are a poor fit for the neighborhood, and are poor opportunities for redevelopment. Lincoln Heights does not need an automotive dealer, for instance, which would take up a lot of space and can be found in other more appropriate parts of the city and region.

LAND USE AND DESIGN RECOMMENDATIONS

LAND USE AND ZONING

The TAP makes all of the recommendations that follow in this section of the report for the sake of building the “missing middle” of the housing supply. A historic lack of housing production of all types results in rising rents and growing competition for the same number of available units. Moreover, the system of land use and zoning regulations in place in most parts of the city only allow extremely large, expensive developments—the luxury condos and market-rate housing projects that spread gentrification. Those realities of the real estate market aren't just true for Lincoln Heights—they are true for the vast majority of urban areas in California.

Various policy incentives could be designed to spur the development of housing affordable to working class residents—usually defined by relation to the “Area Median Income” and filled by people in such critical jobs as nurses, teachers, and a variety of types of people employed in the healthcare and biosciences industries located nearby in Lincoln Heights. Without policy intervention, this means that many of the people working these jobs in the surrounding area have to live much farther away.

New density, and an easier development process, will be necessary for Lincoln Heights to house its children and grandchildren and to give the next generation opportunities for entrepreneurialism in the local business community. Poorly planned development might bring gentrification, but no development at all is also likely to fundamentally alter the character of this multi-generation community, making it too expensive and difficult for current residents and their children to afford to live and work here.



Area 1 Parkway to the Heights

That is where the community needs to step in and take control of where and how density is warranted and to shape the change that is coming to Lincoln Heights. The process of shaping the change must commence with rigorous reform of the land use and zoning regulations that govern development in Lincoln Heights.

The current system of land use and zoning regulations in Lincoln Heights obstructs investment into the kinds of housing developments that will be necessary to house the next generation of Lincoln Heights residents. A thriving, dense residential community is also desirable to support the businesses located along North Broadway.

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The zoning includes many structures that do not appear to have apparent historic value.

Residential densities and Q Conditions along the North Broadway Corridor create some of those impediments, but challenges to residential development expand beyond the corridor. There is also a Historic Preservation Overlay Zone (HPOZ) in effect in much of the Lincoln Heights residential area, which can make development much more difficult as a general rule—even when existing properties do not include a historic structure worthy of protection. Finally, the Cornfield Arroyo Specific Plan (CASP), located between the Los Angeles River and the I-5 Freeway, has not proven to be effective as intended in encouraging residential developments.

In fact, the current system of land use and zoning regulations in Lincoln Heights culminates an extensive history of downzoning, i.e., setting the densities allowed in the built environment at levels below the precedent set earlier in the neighborhood's history. In 1990, all the R4 densities in Lincoln Heights were eliminated. In 2000, the R3 zones were eliminated. In the place of those moderately permissive densities, the entire North Broadway corridor was set to RD1.5 and RD2. A Q Condition was added along the corridor to set all the residential equivalences at RD1.5.

For an understanding of the effects of the densities established by previous downzoning and the existing Q Conditions, examine the case of a standard commercial lot on the corridor—a lot of about 8,500 square feet. At a density more typical in transit rich areas around the city, a new development would be allowed about 21 units in a multi-family and mixed-use type project. Today, however, under the RD1.5 created by the Q Conditions, the allowable density along the North Broadway corridor would yield only six units. That represents a 75 to 80 percent reduction in the potential to develop residential units along the corridor. Most developers would take a look at this math and say the zoning code doesn't offer enough value to develop a mixed-use building along the corridor. This limits redevelopment opportunities that can create new residential opportunities for middle-income and middle-skilled workers.

Therefore, the TAP recommends revising or eliminating the Q Condition to remove the limitations of the RD1.5 density.

New densities must still be set carefully. The new Transit Oriented Community (TOC) program in the city of Los Angeles would establish a new standard for areas like the section of Lincoln Heights around the intersection of North Broadway and Daly Street. Under the TOC, that part of the neighborhood would be defined as "Tier 2," and be set at a fairly intense level of development. Everything in Area Two would be set as Tier 1 under the TOC program. Lincoln Heights will need to think carefully about how those TOC zoning changes could apply to the neighborhood, and make sure that new development is built to an appropriate level of density.

Additionally, the TAP recommends that the community revisit the HPOZ limitations in Area Four. The HPOZ was adopted in 2004—mostly for good reason. There are great, historic houses and buildings in the neighborhood. The HPOZ offers a lot of value for those kinds of historic buildings. The area covered by the HPOZ is very large, however, stretching all the way from the freeway to the west to Eastlake Avenue and beyond the corridor to the east. Parcels covered by the HPOZ have to go through a very extensive, difficult, and expensive

entitlement process. But there are many buildings in the HPOZ that are not historically significant and do not contribute to the character of the neighborhood.

The question is what to do with those buildings. There might be opportunities to revisit specific buildings, look at the boundaries of the HPOZ, and revisit the criteria used to determine historic significance and the redevelopment process within the HPOZ. The TAP believes HPOZ reform can be achieved without risking the kind of sweeping development that would destroy the neighborhood's character. But it ought to be possible to streamline investment where it could benefit the community. Lincoln Heights should identify the locations in the HPOZ that can handle additional density without diminishing the neighborhood's historic significance.

The area regulated by the CASP also needs a retooling of its regulatory scheme. The TAP was informed that no residential units have been added to the CASP area since its adoption in 2013. The TAP recognizes the distinct qualities of the CASP area in Lincoln Heights compared to the commercial corridor along North Broadway—a distinction made more obvious by the freeway separating the two areas. There are opportunities to either make an entirely new specific plan or to add additional zoning changes to the CASP specific to that corner of Lincoln Heights.

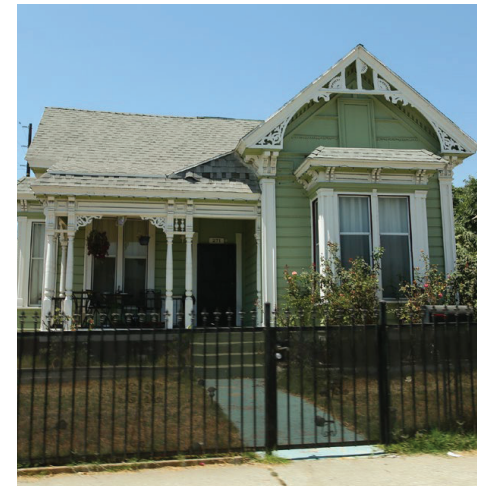
Carefully considered zoning changes could intensify development, particularly in the area surrounding Albion Riverside Park, and provide connectivity to the North Broadway corridor. Although the I-5 Freeway will remain a substantial barrier, there are opportunities for new development in Area One to enhance the connections between that corner of Lincoln Heights, the park, and the commercial corridor along North Broadway.

A critical element of all of these recommendations for loosening development regulations and increasing allowable densities is the need to leverage the new value created by the changes for benefit to middle income residents. Here, the TAP is recommending a novel approach to development incentives and value capture.

The TAP recommends a new kind of "Community Benefit Zoning," particularly in Area One, where new density creates funding for community benefits. Property owners get additional value, in the form of upzoning for additional density, but some of that value is invested directly back into the community. When developers and property owners build larger, multi-family or mixed-use development, projects can be built specifically at prices affordable for middle-income residents and can create a community benefit program that funds investments in the immediately adjacent neighborhood.

The TAP is suggesting that the city of Los Angeles has an opportunity in Lincoln Heights to create a first-of-its-kind density bonus program that ties new development incentives specifically to the development of new workforce, middle-income housing. That kind of program doesn't exist anywhere else in the city. The TAP thinks Area One of the North Broadway Corridor study would be a great testing ground for this new policy idea—with potential application in other locations of similar historic character and demographic makeup around the city.

Historic Preservation Overlay Zone adopted in 2004.



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PARKING

Just as important as the characteristics of the buildings on and around North Broadway are the roads in front of the buildings and the parking lots behind the buildings—the infrastructure that provides access to the corridor. Public parking lots provide a tremendous asset along the corridor. There are 290 parking spots on six parking lots in the immediate core, which would cost \$10.2 million to replace in total with a parking structure.

The TAP reviewed aerial photos of the city lots, and noted that at their busiest time, these lots had 168 cars parked in the 290 parking spaces, or an average of 58 percent occupancy. Some of the lots were full, and some of them were not so full. Parking planners consider 85 percent occupancy to be effectively “full”, requiring immediate action. Curb parking spaces showed close to the same occupancy rate, at about two-thirds.

Therefore, the TAP believes that parking supply isn’t a problem today, despite the perceptions of a few of the interviewees.

Parking recommendations



With some of the new developments the TAP is recommending, however, demand could go up, and supply could become a problem. Moreover, the city’s plans to develop affordable housing on five of the city-owned lots would reduce the number of parking spaces by a significant amount. The TAP recommends revising the plans for those affordable housing developments to include the replacement of a majority of the lost parking spaces.

Furthermore, the developments proposed by the TAP—middle-income housing, new retail along North Broadway, and additional residential units on upper floors along North Broadway—would require a few extra parking spaces. This doesn’t mean that parking requirements should be set at such high levels that they could kill the economics of the project, but some parking spaces must be provided to serve the demand.

Lastly, the TAP recommends consolidating public and private lots to reconfigure and create more spaces and better manage the reservoir of spaces. Throughout the neighborhood, fences separate immediately adjacent public and private lots. Consolidating those lots would yield more parking on the same footprint.

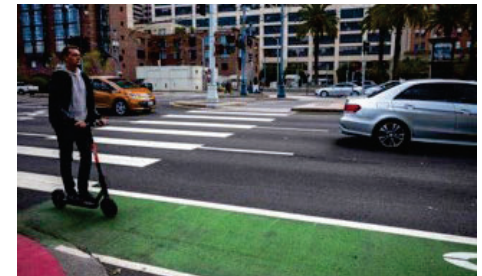
FIRST AND LAST MILE SOLUTIONS

The TAP also considered options for improving all of the non-automobile options for moving to and through the North Broadway corridor. One of the key considerations for improving alternate forms of mobility is the first and last mile problem—how to get to and from the end of a transit trip without reverting to a private automobile.

There are a number of important destinations adjacent to the core of Lincoln Heights, like the employment opportunities at the LAC+USC Medical Center and the USC Health Sciences Campus. The Metro Gold Line is another important destination, with connections to Downtown and the wider region. The Metro Gold Line is the perfect example of the need for first and last mile solutions—it’s not immediately adjacent to North Broadway, but it’s still close enough to be convenient with the right options for access.

Lincoln Heights stakeholders should seize opportunities to recommend that USC modify the routes of their existing shuttle system to extend through North Broadway and up to the Gold Line station. Similarly, Lincoln Heights should work toward similar adjustments to the DASH buses run by the Los Angeles Department of Transportation (LADOT). A simple rerouting of the route that runs through Lincoln Heights would require no capital investment in physical infrastructure, and could link all of these important employment centers, North Broadway, and the Gold Line. Metro could also increase the service frequencies of the existing bus lines like the 751 and 250, which connect north from North Broadway to the Gold Line station. With the NextGen bus system redesign currently underway at Metro, Lincoln Heights has a rare and critical opportunity to advocate for those changes.

The TAP also recognizes the potential of walking and biking infrastructure improvements to improve public health outcomes and reduce congestion by providing non-automobile mobility opportunities. The next section of this report will discuss pedestrian improvements in more detail.

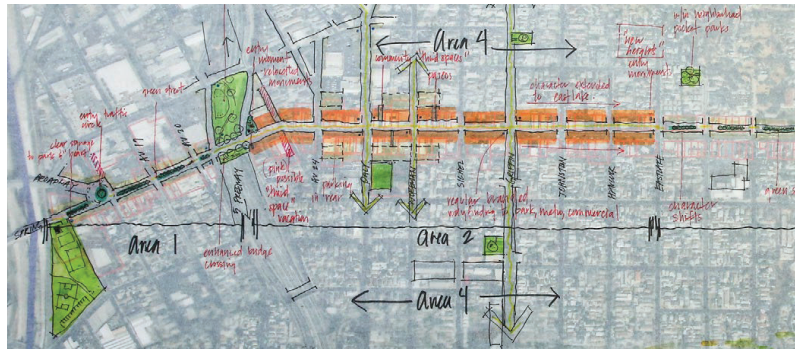


New app-based transportation systems, like dockless bike share systems, electric scooters, electric bicycles, electric vehicle car share, and Metro’s microtransit program, also represent innovative new solutions to first and last mile challenges. All of these new options can be targeted to the community and made affordable to the community through subsidies financed by both the public and private sector.

The Dash and dockless scooters will help strengthen the first last mile connections.

Because it was built to accommodate streetcars when it was originally developed, Lincoln Heights has great potential to become a transit rich environment again. It will take some modest, inexpensive adjustments to realize the full potential of its mobility options.

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Vision Plan

THE PUBLIC REALM

To discuss urban design in the public realm, the TAP followed the same logic as in the rest of the report by splitting the North Broadway corridor and the surrounding neighborhood into sections—Areas One through Area Four. The design recommendations proposed here focus on strategic interventions in the three areas located directly along the North Broadway corridor.

In Area One, the TAP suggests design interventions that improve connections to the Los Angeles River, as well as building direct connections between the new Albion Riverside Park and the North Broadway corridor. In Area Two, which the TAP design team referred to as “The Heart,” urban design should prioritize a dynamic street life and a vibrant pedestrian culture. In Area Three, the TAP recommends urban design interventions that will connect to surrounding neighborhoods, connecting the residential community to the commercial corridor. Improvements in Area Three should focus on walkability and the community character.

The theme of the “good bones” of Lincoln Heights continues into the design of the public realm. There’s a good pedestrian scale to the street—the sidewalks offer accommodating width, numerous street trees provide shade, and historic

street furniture and streetlights add to the unique character of the public realm. The TAP proposes only to strategically enhance those existing amenities—adding a layer of creativity to enhance the vibrancy of the public realm in an already vibrant neighborhood.

In more detail, the TAP proposes design interventions that enhance the boulevard character of the corridor in Area One. “The Boulevard,” as the TAP design team referred to this section of North Broadway, is designed to distinguish this stretch of the corridor from “The Heart” located to the east. The Boulevard is distinct with greenery: quality planters, bioswales, and a traffic median in the middle of the street. Improved lighting and signs will also be a critical improvement in Area One, to announce the park and the visitor’s arrival to Lincoln Heights. The signs should differentiate Lincoln Heights from Chinatown and Downtown and begin to celebrate the unique qualities of the neighborhood.

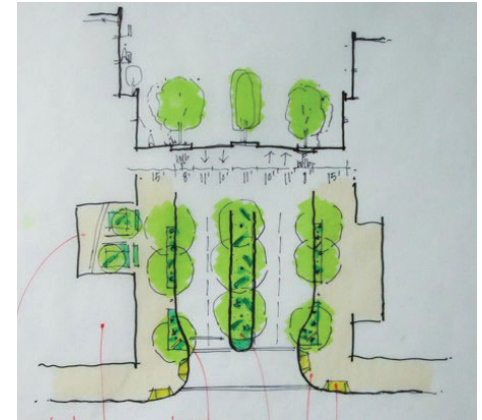
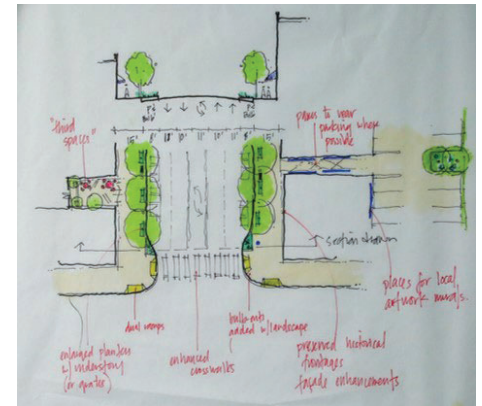
The TAP design team also proposed that a traffic circle be studied as a potential gateway to Lincoln Heights in Area One. Regardless of whether the final product is a traffic circle or some other large gateway feature, a large design feature should be added to announce the arrival to the neighborhood and the transition into “The Heart” of the corridor.

The TAP also envisioned a cap park over the I-5 freeway. There are examples of cap parks found around the country, such as in Dallas with Klyde Warren Park, and proposals for cap parks right here in Los Angeles, bridging the 101 Freeway in downtown and farther west to create a large Central Park in Hollywood. Freeways create a major barrier to connectivity, and can sever neighborhoods. The block between North Broadway and Pasadena Avenue is particularly well suited for a cap park—other sections of the freeway are precluded from a cap park by on- and off-ramps.

The cap park is a very speculative idea by the TAP, but it would be an ambitious and iconic approach to solving the connectivity challenges between Area One and Area Two in the study area, and a huge benefit to the neighborhood. A cap park in Lincoln Heights would quiet the freeway’s presence in the neighborhood, both figuratively and literally, and restore some of the connective tissues between the river, the new Albion Riverside Park, the North Broadway corridor, and the residential neighborhoods of Lincoln Heights. Although there would be numerous challenges in funding and planning before a cap park could be built, this idea represents the kind of ambition that is possible with the full political involvement of the Lincoln Heights community.

Drawings created by the TAP show the median of North Broadway in Area One, showing planters, bioswales, and greenery. The TAP does not recommend reconfiguring the street to alter the flow of traffic through the area. Another ambitious project would be to ground the overhead utilities, which would provide more space for street trees. The TAP created additional drawings to showcase the character of North Broadway in this area, highlighting the role of signs to connect people from Downtown into Lincoln Heights, and providing opportunities for whimsical experiences.

As North Broadway transitions into “The Heart” of the corridor, a lack of center median announces the transition to a new section of the corridor. Most of the suggested improvements in this area would be located on the sidewalk. To enhance the pedestrian experience, the TAP recommends



Typical plan view maps of Area 1: Parkway to the Heights and Area 2: Broadway at the Heights

Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

the design and implementation of safer crosswalks, bulbouts to slow traffic, and gathering areas along the sidewalk. These gathering spaces would serve as “third spaces” in the public realm. These gathering spaces could be of different sizes, carved out of the sidewalk, in little corridors along the street, in paseos, or even right in front of some of the businesses located along North Broadway. The TAP also recommends an increased presence of public art to supplement these gathering areas.

One of the TAP design team’s drawings shows bulbouts of the sidewalk, which pinch the street to slow traffic and to decrease crossing times for pedestrians. Bulbouts also create opportunities for signs and branding. This plan view of the street in Area Two also shows an increase in the number of street trees.

The heart of the commercial core.



Farther to the east, in Area Three near Eastlake Avenue, the TAP imagines another gateway feature. This proposed feature shares some of the green and natural character of the features proposed to the west, but a more neighborhood scale is appropriate on this side of the corridor. The TAP design team’s concept for the feature includes planters and biosvales, as well as rubber sidewalks, trail markers, neighborhood-oriented signage, community tree plantings, and community libraries.

Another key public realm feature the TAP noticed is the Lincoln Heights pylon signage in front of the gas station at the corner of North Broadway and South Avenue 24. The TAP recommends moving that pylon closer to the freeway to effectively extend the corridor and signal the presence of all the activities already occurring toward the edges of the corridor.

With more going on at the west and east ends of the corridor, the district should be branded accordingly. The entrances to the North Broadway Corridor should be found much closer to the freeway on the western edge, and much closer to Eastlake Avenue on the eastern end.

IMPLEMENTATION

FINANCING

The TAP gathered a list of financing options to provide the funding and incentives necessary to achieve these goals and ensure an inclusive era of community and economic development in Lincoln Heights. These financing ideas include options that will be more familiar, and more conventional, as well as options that could be considered non-conventional.

For transit and the first and last mile improvements, the TAP recommends sources from Metro and city of Los Angeles, such as the Local Return Program, the Wayfinding Signage Grant Program, and the Active Transportation Program.

Stakeholders should also apply for Safe Clean Water Program funding through Los Angeles County in the event the proposed property tax measure is approved in the November 2018 election. It would generate funding for green stormwater infrastructure projects like those proposed by the TAP for Lincoln Heights. If it passes, the new property tax would generate \$300 million in project funding every year.

Those are more conventional approaches to funding. The TAP’s recommendation for workforce housing is far from conventional, however, and will require more unconventional financing mechanisms. The TAP therefore recommends financing programs that can capture value from the zoning and development changes in the Cornfield Arroyo Specific Plan area in Area One of the study area—what the TAP referred to as “Community Benefit Zoning” earlier in this report. An Enhanced Infrastructure Financing District or a Community Facilities District could be used as the vehicle to capture the benefits and could also generate the funding from new development. Whatever specific value capture mechanism works best for Lincoln Heights, community benefits should be reserved for creating workforce and

middle-income residential units. Development fees could also be established with the specific purpose of financing workforce and middle-income housing projects in the immediate area.

Any development fees or value capture in Area One could be used to set up a relatively new financing program called an opportunity fund. The Opportunity Zone program recently created by the federal government and approved for Lincoln Heights by the state of California enables this novel form of financing. An opportunity fund could be complemented by the formation of an Enhanced Infrastructure Financing District or a Community Facilities District.

The biggest challenge of establishing any of these financing programs will come from harnessing the political and bureaucratic will to implement the financing program and to deliver the desired investments to the neighborhood.



Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

Transfer of development rights provides another non-conventional method to finance some of these private and public improvements. A transfer of development rights program allows development rights to be transferred from one parcel to another, without actually increasing the overall density, to create value for the development. That value can make it easier for developers to gather finances to make investments.

Finally, the major employers in the area, which employ blue collar, service workers, technicians, and other middle-income labor, value having a workforce living in the immediate area. These institutions have an incentive for investing and partnering with investors in the neighborhood. Those employers can and should contribute, potentially even by investing money in workforce housing developments. It's in these employers best interest to have an employment base that lives nearby.

Pop up workshops and community events are creative tools to allow the community to help shape change.



COMMUNITY ENGAGEMENT

Future community engagement processes in Lincoln Heights should include the community at every step in generating creative, fun ideas for the future. It's also essential to capture the ideas and concerns that matter most to existing residents and business owners. The passion of people who know Lincoln Heights the most intimately must be heard.

Community engagement processes also provide opportunities for transparency. Sometimes community engagement is about informing the community about changes coming to the neighborhood and how community members can participate and shape that change. Just a few of the variety of opportunities for the informative kind of community engagement include public workshops, community events, and booths at farmers' markets.

Additionally, the TAP recommends empowering official community ambassadors, calling on key leaders or influencers from the community to act as consistent points of contact with the local community. These community ambassadors can engage with the community to learn their needs and concerns while providing a clear, transparent path for the future. Multilingual ambassadors will be critical in Lincoln Heights.

The TAP also recommends engaging with a public relations firm—choosing a firm that really knows the area and can help manage the message to the media and residents. A PR firm can be of tremendous benefit when managing a communication flow.

Lastly, the TAP recommends building a strong online presence, where plans are laid out clearly, progress updates are posted regularly, and community members can provide feedback.

BRANDING

Lincoln Heights has a distinct, strong personality, and it should have a brand to match its unique qualities. The TAP recommends "New Heights" as an example of a branding campaign that refreshes that existing personality of the community while moving into the future.

The TAP wrote a mission statement to help direct the community toward some statements about the unique strengths and causes worth celebrating in Lincoln Heights:

The cherished community of Lincoln Heights is home to nearly 40,000 residents nestled within a mile radius. Tightly situated and tightly knit, Lincoln Heights is the oldest neighborhood in Los Angeles, steeped in its diverse, multi-cultural roots and multi-generation families and businesses that helped establish the region. Lincoln Heights flourished economically during America's economic boom in the 1920s, and 100 years later the neighborhood is poised for revitalization worthy of its roots. Coalescing old and new, the New Heights campaign will make all that's old new again.

A lifeline for the community, the North Broadway Corridor will serve as the hub for a vibrant thoroughfare anchored with national stores sitting alongside historic storefronts. Dynamic food and beverage outlets offer a "third space" for residents to congregate, and enjoy the future of the neighborhood. Newly developed and renovated housing options will offer elevated and accessible living experiences to residents, ensuring accommodation, not displacement. In support of the health and wealth of the community, accessible marketplaces will offer fresh, healthy grocery options.

The idea of bringing Lincoln Heights to New Heights is rooted in investing and growing from within, elevating the entire community. This approach offers several campaign slogans that further describe the goal and aim of the New Heights campaign:

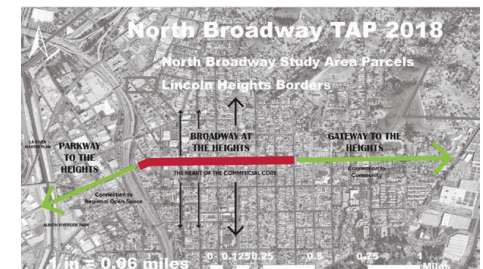
*Take your career to new heights.
Take your weekend to new heights.
Take your business to new heights.
Take your future to new heights.*

This branding campaign holds true to core values like staying authentic and inclusive, laying the foundation for investment in the community (for and by the community), invigorating the community with new investments, celebrating and protecting the soul of the neighborhood, looking forward into the future, and empowering the inherent entrepreneurialism of the community.

All of these core values empower the community to care for itself by improving its wealth and health on its own terms.

Any branding campaign adopted for the North Broadway corridor and for the wider Lincoln Heights community will have to achieve community buy-in, and will also require a champion from within the community. The TAP believes the Lincoln Heights Business Improvement District is the natural organization to fill the role of champion for whatever branding campaign the community decides to employ.

North Broadway Study area parcels including Lincoln Heights Borders



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TIMELINE

The TAP recommends breaking all of these tasks and action items into a manageable timeline to deliver changes and achieve goals incrementally and strategically. The early stages of the timeline also include recommendations about which organizations are best positioned to take a strong leadership role in the pursuit of these goals and objectives.

Short Term, Year One

- Position the Leadership Group to own the work plan.** This is the first step in shaping the change, and in the community being an active participant in whatever changes will come to the neighborhood. The proposal, from planning to financing to project delivery, must have a champion, and the Leadership Group is in the best position to gather resources and hold public and private institutions accountable. The Leadership Group might not agree on every point, but their stewardship will be necessary to ensure that desired results are achieved and undesirable results are avoided.
- Commence Q Condition zoning change for the corridor with the leadership of Council District 1.** This Q Condition is the key to unlocking new, desired development on the corridor. The Council District will have to spur the Planning Department to reconsider the Q Condition. The Council District can cut through a lot of red tape.



- Establish the Lincoln Heights Business Improvement District as the champion for the branding and marketing campaign.** A powerful and broadly adopted branding and marketing campaign must accompany whatever concerted effort of investment goes into the corridor and the neighborhood.
- Set-up a dedicated Lincoln Heights website.** A Lincoln Heights website could include transparent details of planning efforts, provide a forum for community engagement, and immediately amplify the discussion about the future of North Broadway and Lincoln Heights.
- Begin community engagement through the Leadership Group.** These events and education opportunities need to go out into the community immediately.
- Develop and design a stormwater capture and tree maintenance plan to apply for Safe Clean Water Program funding** through Los Angeles County, and track the success of the stormwater infrastructure initiative in the November 2018 countywide election.
- Install wayfinding signs to Albion Park and the Metro Gold Line station.** The park will be fabulous, and people need to know how to get there when it opens. The Metro Gold Line also offers great access to the rest of the city and region. People need to know the easiest ways to get to and from North Broadway and the surrounding community to the Lincoln Cypress Station on the Metro Gold Line.
- Revisit the Cornfield Arroyo Specific Plan (CASP)** where it's in effect in Lincoln Heights to leverage the investment in the Albion Riverside Park and to better connect this corner of the neighborhood to the Broadway Corridor.
- Monitor the Metro NextGen bus study** to advocate for increased bus frequencies on routes connecting to train lines nearby employment centers.

Mid Term, Years Two to Four

- Implement Cornfield Arroyo Specific Plan changes.
- Consolidate public and private parking lots.
- Complete the development deal for housing construction on city parking lots with selective parking replacement to settle the city's plans for developing those parking lots with affordable housing.
- Supplement the city's affordable housing development plans with a corresponding plan to deal with changes in the area's supply of parking, both on-street and off-street, and both public and private.
- Re-evaluate significance standards of the Historic Preservation Overlay Zones (HPOZ) and evaluate zone boundaries as appropriate.
- Complete Q Condition zoning changes to create incentives for workforce housing.
- Work with major local employers to develop a workforce housing program.
- Pursue bike share, electric scooter, and electric vehicle sharing options.
- Pursue Metro and city funding for transit and mobility improvements.
- Establish an opportunity fund and develop a complementary city program to take advantage of new Opportunity Zones.
- Enhance pedestrian crossings over the I-5 Freeway.
- Implement streetscape greening in Area One and Area Three.
- Move and enhance existing gateway signage to Area One edges.
- Hire a branding and public relations firm to implement the branding campaign adopted by the community.

Long Term, Five Years and Beyond

- Identify and build public third spaces (paseos, pocket parks, plazas).
- Evaluate development potential for the vacant lots in Area Three.
- Initiate initial workforce and middle-income housing developments.
- Connect LAC+USC Medical Center and USC Health Sciences Campus to the Gold Line Station via Griffin Avenue and the North Broadway corridor.
- Install branded signage and wayfinding.
- Employ a community ambassador to maintain and enforce the brand.



Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

CONCLUSION

Lincoln Heights is a profoundly rich cultural and historic community, with energetic productive activity and the potential for even more. As this report has repeated on several occasions, Lincoln Heights has "great bones," but that's only part of what makes it such a great community. The identity and culture of Lincoln Heights is too special and unique to ignore, and should be encouraged and protected. To flourish and persist, the residents and business owners of the Lincoln Heights community will have to take control and shape the change that is surely coming. If the community doesn't engage with the dynamics of the city and region now, someone else will be making these decisions for the community.

While this TAP report encourages investment and growth in Lincoln Heights, all of these recommendations are made with the goal of creating space and opportunities for the children and grandchildren of current residents. Investment is a necessary element to a future that allows the community of Lincoln Heights to continue to grow together. If the community stays invested, it can maintain the culture and the character of Lincoln Heights.



To achieve this inclusive vision of local and community-led growth in Lincoln Heights, the TAP suggests enhancing the heritage of the neighborhood as a streetcar suburb by focusing on improvements in the public realm and by revising land use and zoning regulations to return development opportunities that match the historic scale of the neighborhood.

Investments by both the public and the private sectors should focus on a moderate scale of building, made accessible to middle income residents who work at nearby employment centers, and on the improvement of mobility options that offer access to the economic opportunities of the area and the region.

The Lincoln Heights community is already strong enough to express and pursue its vision for the future. There shouldn't be any delay in beginning to implement that vision. It's time for the Lincoln Heights community to envision and shape its own change and move to New Heights.



The North Broadway Corridor

Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

ACKNOWLEDGEMENTS



Panelists conducting key stakeholder interviews.

The Technical Advisory Panel (TAP) wishes to acknowledge the sponsors of the study Michael Banner and the Los Angeles LDC, Inc.

The TAP is thankful for the commitment and participation of stakeholders. The following is a list of individuals who were interviewed or provided valuable information and perspective during the TAP process:

- Misty Iwatsu, LH Benefits Association of LA
- Miguel Acuna, City of Los Angeles
- Dave Solanki, Big Saver Foods
- Jose Rodriguez, City of Los Angeles/Council District 1
- Gerald Gubatan, City of Los Angeles/Council District 1
- Steve Kasten, Kasten Properties
- David Abasta, GAW Capital USA
- Mick Moody, Colliers International
- Jennifer Lopez, Bank of America
- David Galaviz, USC
- Richard Fisher, City of LA/Department of Public Works
- Henry DeGuevara, Resident of LH
- Angelica Campos, State Farm Insurance
- Natalie Gonzalez, Wells Fargo Bank
- David Masuku, CVS Pharmacy

PANEL CHAIR BIOGRAPHY

CECILIA V. ESTOLANO
Co-CEO, Estolano LeSar Advisors

Cecilia V. Estolano is a leading expert on contemporary urban planning issues, with experience in economic and workforce development, land use, environmental equity, and urban revitalization for cities and communities across the country. Cecilia is a Regent of the University of California and has served as President of the California Community College Board of Governors. She received an A.B. from Harvard-Radcliffe Colleges, an M.A. in Urban Planning from UCLA, and a J.D. from UC Berkeley. Prior to founding Estolano LeSar Advisors in 2011, Cecilia served as CEO of CRA/LA, practiced land use and environmental law at Gibson Dunn & Crutcher, and served as Senior Policy Advisor at the U.S. EPA.



Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

PANEL MEMBER BIOGRAPHIES

ANDREW FOGG

Partner, Cox, Castle & Nicholson LLP

Andrew Fogg is a partner with Cox, Castle & Nicholson LLP, where he is a member of the Land Use and Natural Resources team. Andrew represents private developers and public agencies in all aspects of land use and entitlement law, including compliance with the California Environmental Quality Act. Andrew focuses his practice on urban infill and transit oriented development projects, but has worked in virtually every sector, including retail, office, multi-family residential, medical, hospitality, planned communities, and industrial. Andrew is a Los Angeles native; he grew up in the nearby neighborhood of Ladera Heights, where his parents still live. Andrew received his BA from UC Berkeley and his law degree from UC Davis.

PATRICK A. GIBSON, P.E., PTOE

President, Gibson Transportation Consulting

Pat Gibson has nearly 50 years of experience in preparing traffic and parking analyses for both public and private sector projects, including business districts, mixed-use developments, event centers and stadia, theme parks, movie studios, schools and universities, hospitals and medical centers, office buildings, shopping centers, residential projects, and industrial uses. Current and recent projects include The Disneyland Resort®, Dodger Stadium, DubaiLand Theme Parks, The Huntington Library, LAX Northside Plan Update, Levi's Stadium, Lucas Museum of Narrative Art, The Village at Westfield Topanga, Universal Studios Hollywood, and the University of Southern California. Pat also currently serves as the City Traffic Engineer for the City of Monrovia, California.

Pat co-authored both editions of Shared Parking as well as Parking Requirements for Shopping Centers, 2nd Edition for the Urban Land Institute and International Council of Shopping Centers. Pat was named Outstanding Transportation Educator by the Institute of Transportation Engineers Western District and was twice awarded the Civil and Environmental Engineering Department Lecturer of the Year at the University of California, Los Angeles.

AMBER HAWKES, AICP

Principal and Co-Director, Here LA

Amber Hawkes, AICP is Principal and Co-Director of Here LA, an interdisciplinary urban design and planning practice. Amber leads a diverse portfolio of projects - from large-scale open space concept planning and streetscape design, to strategic planning surrounding first mile / last mile and mobility solutions. Many of the firm's projects use out-of-the-box strategies to design and test urban improvements, including "tactical urbanism," pilot projects, and art-filled pop-up workshops. Amber has worked on vision and master planning projects for cities and clients throughout the US, with a focus on creative problem solving and community engagement through in-the-field trainings, walk and bike audits, consensus-building, and design charrettes. Amber is also an instructor at the UCLA Luskin School of Public Affairs in the Graduate School of Urban Planning, and speaks at conferences, forums, and universities about urban design-related topics.

MEGAN HORN

Managing Principal, Creative, BrightView

Megan Horn is a Managing Principal at the creative arm of BrightView – the nation's leading fully integrated landscape services company. Believing in the importance of landscape architecture, her practice is built on a professional commitment to the built environment and its interface with natural systems and processes. She has more than 14 years of experience in the planning and design of complex landscape projects within the Los Angeles metropolitan area and has a substantial award-winning portfolio across both public and private sectors. Megan's approach to design is performance driven and she synthesizes project information into clear, consistent and achievable strategies that resolve the site's challenges with creative solutions. Her systems-oriented perspective results in truly performative spaces, that enrich the ecological health of the site, as well as the user's experience.

Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

SHELLY LEVIN

Director of Communications,
Hirsch Bedner Associates

Shelly Levin is the Director of Communications for Hirsch Bedner Associates (HBA), the world's leading hospitality interior design firm. She manages the international activity of multiple PR firms, brand divisions, project campaigns and the firm's branding division, HBA dna, reporting directly to company shareholders. She leads the firm's communications across six continents, spanning from Los Angeles across to international hubs such as London, Dubai, Hong Kong and Singapore.

TAYLOR NEIMAN

Cofounder & Managing Partner,
Team Kalsman Partners

Taylor Neiman is the Cofounder & Managing Partner of Team Kalsman Partners, a syndicator focusing on value-add multifamily product in California. Taylor also spent over two years at the boutique consultancy RCLCO, working across all their practice groups to provide objective third-party analysis and portfolio management services to clients nationally. In June 2017 he earned his MBA from UCLA Anderson School of Management with a specialization in Real Estate. Prior to graduation Taylor had interned at RCLCO and with the Real Estate Investments team at LACERA, a local pension fund consistently ranked in the global top 100 largest pension funds by AUM. He began his real estate career six years prior with his first equity investment here in Los Angeles. He is an active member of ULI Los Angeles and sits on the TAP and YLG Programs Committees. Taylor earned a B.S. in Chemistry with a minor in Economics from Harvey Mudd College, is an avid world traveler who has visited 13 countries on 4 continents, and is a licensed skydiver with nearly 50 jumps to date.

JAMES RABE

Senior Principal, Keyser Marston Associates

James Rabe has more than 35 years of financial and real estate advisory experience. He provides public sector clients with public finance, development strategy, developer selection and deal structuring capabilities. He has been involved in the analysis and implementation of public/private residential, retail, industrial, office and mixed-use projects in California, Nevada and Arizona. He has been involved in major P3 developments in Anaheim, Commerce, Huntington Beach, Long Beach, Los Angeles, Rialto, and Ventura. He has provided asset advisory services to Los Angeles and Orange Counties and the Cities of Anaheim, Long Beach and Torrance among others.

JAMES SUHR

President, James Suhr & Associates LLC

Jim Suhr, principal of James Suhr & Associates LLC, has focused on urban infill development of all product types throughout his career in Southern California real estate. His 35 years in the field encompass experience in acquisitions, entitlements, development and asset management of a wide range of land uses. Jim has been involved in developing a number of transit-oriented mixed-use projects, including Washington National Station in Culver City and Wilshire Vermont Station in Koreatown, as well as industrial, office, apartment, condominium and historic rehab projects in markets across Southern California. Jim provides development management and economic advisory services to a range of public and private sector clients, including Hackman Capital Partners, Hilton Universal City, Four Seasons Hotel Westlake Village, and Black Equities Group among others. He is a graduate of UCLA's Anderson School of Management and School of Urban Planning.

Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued



TAP Panelists from left to right: Andrew Fogg, James Brasuell, Pat Gibson, Marty Borko, Jim Rabe, Cecilia Estolano, James Suhr, Megan Horn, Amber Hawkes, Taylor Neiman, Shelly Levin, Cyrice Griffith.

Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

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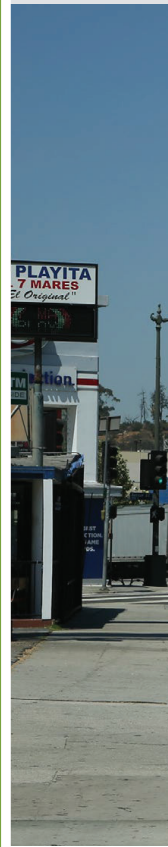
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Response to Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020)

657-675

The commenter states that the Lincoln Heights North Broadway Corridor would be affected by construction of the HSR project. Actually, no physical improvements are proposed on North Broadway. As described in Section 3.2.6, North Broadway is not a roadway that would be affected by project construction activities or permanent roadway changes. Further, the boundary map for the North Broadway Corridor presented on page 3 of *The North Broadway Corridor Briefing Book* prepared by the ULI-LA Technical Assistance Panel provided by the commenter indicates that Areas 1 through 4 of the North Broadway Corridor are located east of the proposed HSR alignment. Moreover, as shown in Appendix 3.12-D, Property Acquisitions and Easements, a temporary construction easement would be required on North Broadway, west of the Los Angeles River and outside of the Lincoln Heights North Broadway Corridor area boundary.

657-676

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 California High-Speed Rail Authority (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 the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA), of 45 days.

657-677

The commenter states that property owners along the North Broadway Corridor may not have been made aware of the release of the Draft EIR/EIS and have not been able to review the report.

The Notice of Availability of the Draft EIR/EIS was mailed to the last known address of all organizations and individuals who have previously requested notices and persons who own or live on properties within 500 feet of the project footprint, 0.5 mile from each proposed and existing station location, and 0.5 mile from each of the grade separation footprints.

The commenter also states that it is possible that many of the low-income Lincoln Heights community residents may not have online access to view all the project documents as a result of the public library closure due to COVID-19.

In addition to posting sections of the Draft EIR/EIS on the Authority's website and providing copies of the Draft EIR/EIS to public libraries, a printed copy of the Draft EIR/EIS was made available at Caltrans District 7 Headquarters, 100 S Main Street, Los Angeles, CA 90012. Printed and/or electronic copies of the Draft EIR/EIS and electronic copies of associated technical reports were also made available for review during business hours at the Authority's Southern California Regional Office at 355 S Grand Avenue, Suite 2050, Los Angeles, CA 90071. Moreover, as discussed in the Notice of Availability of the Draft EIR/EIS, interested parties were able to request a copy of the Draft EIR/EIS by calling (877) 977-1660.

Therefore, the Draft EIR/EIS was made accessible to those without access to the Authority's website or public libraries.

Response to Submission 657 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, June 26, 2020) - Continued

657-678

The commenter states that the affected individuals in the Lincoln Heights area do not have access to the report, internet access, or the ability to view this report in a language they speak.

As described in the response to Comment 657-677, contained in this chapter, physical copies of the Draft EIR/EIS were made available to the public. The Authority made a good faith effort to have copies of the Draft EIR/EIS available to the public at the libraries; but circumstances surrounding the continued COVID-19 closures did not allow the anticipated accessibility of the libraries. Therefore, beginning in July, the Authority placed printed copies of the Draft EIR/EIS at Caltrans District 7 Headquarters in Los Angeles and noted this location on the website. Printed and/or electronic copies of the Draft EIR/EIS and electronic copies of associated technical reports were also made available for review during business hours at the Authority's Southern California Regional Office at 355 S Grand Avenue, Suite 2050, Los Angeles, CA 90071. In March 2012, the Authority Board adopted a Title VI Program; in May 2012, the Board adopted a Limited English Proficiency (LEP) Policy; and in August 2012, the Board adopted environmental justice (EJ) guidance. The adoption of these policies formalized the Authority's longstanding efforts to ensure that no person in the State of California is excluded from participation in, or denied the benefits of, its programs, activities, and services on the basis of race, color, national origin, age, sex, or disability as afforded by Title VI of the Civil Rights Act of 1964 and related statutes.

The LEP Policy articulates the Authority's policy to communicate effectively and with respect, and to provide meaningful access to LEP individuals to all the Authority's programs, services, and activities. Consistent with the Authority's LEP policy, the Authority has provided free language assistance services to LEP individuals encountered during public outreach or whenever requested by LEP individuals.

Community Open House meeting material are generally also translated into Spanish and posted on the Authority's Webpage. If an individual needs a particular document on the California High-Speed Rail Authority website translated, a document translation request may be submitted to the Title VI Coordinator via email at TitleVICoordinator@hsr.ca.gov.

657-678

The Summary, available in English, Arabic, Armenian, Chinese, Japanese, Korean, Spanish, Tagalog, and Vietnamese, provides an overview of the substantive chapters. It includes a table listing the potential environmental impacts for each environmental resource topic and directs the reader to where additional information can be found elsewhere in the document.

The Authority will provide reasonable accommodation to ensure equal access to its programs, services, and activities.

657-679

The commenter requests additional time to review the document in order to inform their property owners, members, tenants, and community stakeholders of the direct and indirect impacts of the HSR project. Refer to response to comment 657-676, contained in this chapter of this Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS), regarding the extension of the public comment period to August 31, 2020. Additionally, the commenter requested that the virtual public hearing schedule for July 8, 2020 be postponed. The Authority provided a variety of forums for the public to engage directly with the project team to ask questions and discuss concerns, including virtual "office hours" meetings throughout the public review period; information meetings with the Taylor Yard community on July 20 and with the Lincoln Heights community on August 25; and, telephone town hall meetings for the entire project section on June 29 and August 19. These meetings were in addition to the required public hearing held on July 8.

Submission 693 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, July 20, 2020)

Burbank - Los Angeles - RECORD #693 DETAIL

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

Stakeholder Comments/Issues :

High Speed Rail Staff:

693-1434

Its my understanding that you are offering office conferences until 7/21/2020. How do I arrange for a conference for the EIR/EIS?

Sent from Mail for Windows 10

Response to Submission 693 (Michael Banner, Los Angeles LDC Community Development Financial Advisors, July 20, 2020)

693-1434

The commenter requested information on how to arrange a conference. In response to this comment, the commenter was contacted and an office-hours appointment occurred on July 27, 2020.

Submission 784 (Christine Mills, Los Angeles River Communities for Environmental Equity, August 3, 2020)

Christine Louise Mills, Director, Los Angeles River Communities for Environmental Equity
 Hans Johnson, President, East Area Progressive Democrats
 Cecilia Dominguez, President, Elysian Valley Seniors
 David De La Torre, Chairperson, Elysian Valley Neighborhood Watch

784-1390

Protect the Los Angeles River and Access to Green Space

Regarding the Los Angeles River as a cultural and environmental treasure, we urge the Authority to exercise care and caution to protect the Los Angeles River as a wildlife habitat, and not infringe upon the planned 100 Acres Vision which includes Río de Los Angeles State Park, Taylor Yard River Park Project, MRCA's easement, and the future Bowtie State Park. It's concerning that this area is not even listed as a park in the Draft EIR. Considering this land as precious, much-needed green space, a sensitive and creative approach is needed, especially for noise mitigation. We ask that the CA High-Speed Rail work closely with community groups and nonprofits such as Friends of the LA River (FOLAR) to both ensure community access to the Los Angeles River and support its revitalization and biodiversity.

July 31, 2020

Burbank to Los Angeles Draft EIR/EIS Comment
 355 S Grand Avenue, Suite 2050
 Los Angeles, CA 90071
Burbank_LosAngeles@hsr.ca.gov

RE: High-Speed Rail Burbank - Los Angeles Segment EAPD Comments from Los Angeles River Communities for Environmental Equity, East Area Progressive Democrats, Elysian Valley Seniors, Elysian Valley Neighborhood Watch

784-1391

Improve, Don't Worsen the Ongoing Public Health Problem from Metrolink CMF

Our primary concern is that this project will exacerbate **the ongoing noise, air and water pollution from the Metrolink CMF**. Funds allocated for Southern California regional rail and the Union Station "LINK US" project should also be used to:

- ameliorate the long-standing pollution problems of the CMF, that predate this project and LINK US by decades.
- include efforts to relocate the CMF if it cannot be sufficiently modernized by implementing strategic, innovative sound mitigation strategies, hood technology, and improved workflow to insure that load tests happen in designated hooded zones, protecting the ecological resource that is the LA River and the public health of Elysian Valley, Cypress Park and all who come to recreate on the LA River Greenway shared path.

784-1388

Dear California High-Speed Rail Authority,

We are writing in support of the California High-Speed Rail (CA HSR) project and to comment on specific issues pertaining to the Burbank - Union Station segment. As voted upon, the CA HSR project has the potential to alleviate much of the pollution generated by short-leg air travel for which there is currently no alternative. By providing CA HSR as intended, we can help CA meet climate goals and amend public health inequities in our neighborhoods by providing a clean, safe, accessible, and swift electric rail connection between northern, central and southern California as intended.

The east area of Los Angeles, in particular, experiences dire air pollution and lives with its health effects. The Burbank-LA line will further impact communities that are already particularly vulnerable to respiratory illness and higher than normal cancer rates due to gross pollution from Metrolink's Central Maintenance Facility (located a few feet from residents homes, schools, pedestrian paths and the LA River) and surrounding freeways.

Although Metrolink has a decades-old pattern of unkept promises, fired auditors, missed deadlines, failed compliance and ambiguous use of public funds, the new CEO, Stephanie Wiggins, has been proactive in wanting to restore the community's trust, and should be consulted regarding the current needs and challenges of this site.

784-1389

Alleviate, Don't Aggravate Our Pollution Burden

Construction of the electrified High-Speed Rail offers **an opportunity to finally right an historic wrong and relocate the CMF**, which was improperly built in 1992 without authority from the City of Los Angeles, CEQA or equivalent assessment of impact. As Metrolink has no Office of Inspector General, documenting this impact has fallen to community members, as seen in [this video](#) of respirable silica dust from sand towers that were being operated by Metrolink without filters.

784-1392

Given how narrow and inherently ill-suited this piece of land along the LA River is to house a massive maintenance facility, the slenderizing of the footprint and loss of the Progressive Maintenance Shop **could worsen unnecessary idling and shuttling of Metrolink engines**, leading to more air pollution for the community, and increased activity on the northern end of the track less than 100 feet from homes and near the pedestrian bridge currently under construction.

We contended that rather than squeeze this dangerous facility that services approximately 25 trains a day into a smaller footprint, **it's finally time to relocate the CMF away from homes, parks, schools, and the Los Angeles River to an appropriate and safe location**, where modern air and noise pollution controls can be implemented. Doing so would allow the HSR tracks to move away from the river's edge, keeping open the possibility for revitalization of the LA River in this section.

784-1393

CMF Area Construction Impact on Community

These negative impacts on Elysian valley residents and workers will be redoubled during HSR construction so we must ask:

- How will this site continue to service engines while also relocating stretches of railway?
- What hours of operation are expected for this work? Contracted work must adhere to the same guidelines for hours of operation as laid out in the Draft EIR and EIS. For example, if Metrolink is contracted to do the rail work through the CMF, then Metrolink

Submission 784 (Christine Mills, Los Angeles River Communities for Environmental Equity, August 3, 2020) - Continued

784-1393

and its subcontractors must find a way to adhere to legal construction work hours and sound ordinances of Los Angeles.

784-1394

Over the years, Metrolink has proven itself untrustworthy in this respect. We already have daily activity from 6:30am - 10:30pm with frequent late night, early morning and weekend operations to service additional trains. We fear that both the building and shifting of current tracks to make way for the HSR tracks, as well as subsequent physical adjustments to this facility may lead to a further extension of an already-long weekday work schedule and frequent additional work on the weekends. In other words, please, do not allow them to build tracks at night.

784-1395

Conforming to Pollution Mitigation Strategies

All contractors and subcontractors must similarly adhere to best practices regarding air pollution from the construction sites, such as measures to contain fugitive dust. Our communities have witnessed all-too-often, construction work being approved only to see flagrant disregard for fugitive dust both at the job site and in construction trucks carrying loads without proper covering. Given that this work will be happening in areas with many sensitive receptors, it is crucial that all contractors follow the strictest guidelines for public health. Empower the community with **tools to identify and report violations** of best practices.

784-1396

Safe Streets: Preserve Bicycle and Pedestrian Pathways

The potential impact on bike paths and pedestrian zones must also be considered and we encourage exploring **preserving space for planned off-street bike paths** or to accommodate a parallel in-roadway Class IV separated bikeway adjacent to where existing or planned Class I bike paths need to be removed. Any substitute or parallel bikeway that needs to be implemented as a result of HSR eliminating the possibility for Class I bike path should provide an equivalent level of protection and user-experience.

784-1397

Proposed transportation impact mitigations include various travel lane additions, street widenings, and intersection signalizations. These mitigations are discussed in the context of impacts to Level of Service (LOS), however California has adopted Vehicle Miles Traveled (VMT) as the primary metric for measuring transportation impacts and vehicle delay mitigations **based on LOS are inconsistent with State policy goals** aimed at reducing greenhouse gas emissions. The document states several times that "LOS is no longer the performance standard for transportation impacts for CEQA" yet proceeds to propose several intersection lane additions and optimizing intersections for vehicle throughput and LOS.

784-1398

Rather than implementing mitigation measures that will exacerbate existing barriers and safety concerns for pedestrians and transit users on city streets, the project **should incorporate project design features that support active transportation and improve connections to public transit**. It is encouraging that a multimodal access plan will be developed prior to the design and construction of parking facilities at each HSR station. HRS stations should be pedestrian-oriented and designed for first/last mile connections via public transit and active transportation rather than serve as glorified parking lots where bicycles, public transit and pedestrians are an afterthought.

784-1399

Acquisition of Personal Property

And we urge that the handful of families whose homes are slated for full acquisition be compensated in a fair and just way, should the design truly necessitate those acquisitions. There are many commercial entities impacted along this route. Those enterprises will surely negotiate fair compensations for themselves, and will have the legal tools and funds to do so. We have an obligation to make sure that the families who do not have those resources are also treated with proper equity.

784-1400

Fully Fund this Project As Voted Upon

We wish to see the HSR project fully funded, with all segments receiving electrification as currently outlined. For the record, we strongly oppose the proposed, cannibalistic redirection of money intended to electrify the Central Valley spine, to Metrolink as lobbied by California State Assemblymembers Laura Friedman and Anthony Rendon and HSR Board Member Daniel Curtin. To be effective, and to stay aligned with the voters' intentions, CA High-Speed Rail must serve the expanse of our State.

784-1401

In closing, we ask for a timely response to our stated concerns to Christine Louise Mills, from Los Angeles River Communities for Environmental Equity via larivercee@gmail.com.

Respectfully,



Christine Louise Mills, Director, LA River Communities for Environmental Equity



Hans Johnson, President, East Area Progressive Democrats



Cecilia Dominguez, President, Elysian Valley Seniors



David De La Torre, Chairperson, Elysian Valley Neighborhood Watch



Response to Submission 784 (Christine Mills, Los Angeles River Communities for Environmental Equity, August 3, 2020)

784-1388

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. Refer to Response to Comments 784-1389, 784-1391, 784-1392, and 784-1395 contained in this chapter of this Final EIR/EIS for detailed responses to comments regarding air pollution in the project area.

784-1389

The commenter expresses a desire for the Metrolink CMF to be relocated as it causes environmental impacts on the surrounding community. The CMF is an important facility to Metrolink and provides major daily servicing location and maintenance facility in the region. Although various yard and maintenance facilities within the CMF would be reconfigured to accommodate HSR, many of the existing yard operations would be retained to the extent feasible (see Section 2.5.2.2 of this Final EIR/EIS for more detail). It is not under the Authority's purview to relocate the CMF if it is not required by the HSR Build Alternative. No revisions to this Final EIR/EIS have been made in response to this comment.

784-1390

The commenter expresses concern for the protection of the Los Angeles River and planned 100 Acres Vision and expresses concern that the Draft EIR/EIS does not list the Bowtie Parcel as a park. The commenter requests that the Authority coordinate with community groups and nonprofits to ensure community access to the Los Angeles River. Section 3.15 of this Final EIR/EIS has been revised to include an analysis of potential construction and operation impacts of the HSR Build Alternative on 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. Furthermore, the discussion in Table 3.15-6 has been revised in this Final EIR/EIS to replace the words "acquisition" and "incorporation" with "improvements" to clarify the impact on Rio de Los Angeles State Park described in Impact PK#3, which 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." Access to parks and recreational resources will be maintained during construction with implementation of TR-IAMF#2, TR-IAMF#4, TR-IAMF#5, TR-IAMF#7, and PK-IAMF#1. Furthermore, based on the Burbank to Los Angeles Project Section Noise and Vibration Technical Report (Authority 2018), noise levels after HSR Build Alternative implementation would not result in substantial changes to facility character or use at recreational facilities.

Response to Submission 784 (Christine Mills, Los Angeles River Communities for Environmental Equity, August 3, 2020) - Continued

784-1391

The commenter asks that the HSR Build Alternative improve, not worsen, ongoing public health problems (air, noise, and water pollution) associated with the Metrolink CMF.

Per CEQA and NEPA, the Authority is not obligated to ameliorate air, noise, and/or water pollution as a result of the existing CMF. However, the EIR/EIS does assess HSR project impacts in addition to the existing condition (which includes the CMF). The CMF will not be relocated as part of the HSR Build Alternative.

As stated in Section 3.3.8 of this Final EIR/EIS, the implementation of the HSR Build Alternative would result in a net air emission decrease of criteria pollutants and GHG emissions compared to the No Project Alternative, resulting in beneficial effects to regional air quality and global climate change. Localized air quality impacts from roadways are discussed in Section 3.3.6.3. Results of the analysis indicate that predicted CO concentrations would not cause violations of CO air quality standards during the HSR Build Alternative Operation.

Additionally, consistent with the FRA criteria, the existing conditions for the noise analysis include noise measurements that capture existing freight train activities, which cause temporary increases in noise levels. The noise analysis is based on daily noise levels for residential uses and peak-hour noise levels for nonresidential sensitive uses. The assessment of potential sound barriers was completed consistent with the Authority's Noise Mitigation Guidelines (Appendix 3.4-B of this Final EIR/EIS). These guidelines establish specific criteria for a barrier to be considered for construction, one of which is the cost of the barrier relative to the number of benefited receptors. This methodology is also consistent with Caltrans' methodology for determining reasonable barriers to build related to cost. For locations where a sound barrier is not built, additional methods of mitigation, as described in detail in Mitigation Measure N&V-MM#3 (Section 3.4.7 of this Final EIR/EIS), will be implemented to reduce severe impacts. The proposed barriers considered within this Final EIR/EIS would be consistent with the Authority's Noise Mitigation Guidelines (Appendix 3.4-A of this Final EIR/EIS). The level of mitigation analysis completed in this Final EIR/EIS is appropriate for the current level of design and stage of project development. Additional mitigation beyond sound barriers would be specifically assessed during final project design. Similarly, any site specific modifications, such as redesign of the CMF, would be completed when the

784-1391

necessary level of detail is available. If at that time a specific impact is identified, noise reduction features would be recommended.

Finally, as stated in Section 3.8.6.3 of this Final EIR/EIS, through adherence to HYD-IAMF#1, HMW-IAMF#9, and HMW-IAMF#10, operations impacts on surface water quality would be less than significant through implementation of an environmental management system, a hazardous materials plan, and operational BMPs to prevent pollutants from reaching surface waters.

It is not under the Authority's purview to allocate Southern California Regional Rail Authority (SCRRA) and/or Metro funds to ameliorate impacts related to Metrolink's CMF facility. The Authority has been and will continue to coordinate with Metro and SCRRA regarding the design of the HSR Build Alternative, including any modifications to Metrolink's CMF facility.

Response to Submission 784 (Christine Mills, Los Angeles River Communities for Environmental Equity, August 3, 2020) - Continued

784-1392

This comment suggests that Metrolink Central Maintenance Facility (CMF) is not an appropriate facility adjacent to the Los Angeles River and the proposed project would lead to more air pollution for the community. All emissions associated with the Metrolink locomotives are under the jurisdiction of the Los Angeles Metropolitan Transportation Authority (Metro). The Draft EIR/EIS concluded that the regional construction analysis would be significant for nitrogen oxides (NOX) and CO pollutants, as shown in Table 3.3-16 in Section 3.3.6.3. All other criteria pollutants VOC, SO₂, PM₁₀ and PM_{2.5} were found to be less than significant.

With the dispersion modeling analysis for the Metrolink CMF construction area, the Draft EIR/EIS concluded that the construction emission concentration would be significant for the 1-hour NO₂ pollutant, as shown in Table 3.3-21 under Impact AQ #5. All other criteria pollutant concentrations were found to be less than significant. After the completion of construction in 2028, the emissions from the construction activity would cease. Because HSR trains would be electrically powered, the operation of HSR trains through the CMF area would not result in any emissions. Additionally, the design at CMF has been revised to maintain the majority of existing yard operations, including the progressive maintenance shop.

784-1393

The commenter states that negative impacts on Elysian Valley residents and workers will be redoubled during HSR construction and requests information regarding the activities at the CMF. As stated in Section 2.5.2.2 of this Final EIR/EIS, the HSR project would reconfigure the CMF while allowing the CMF to maintain as many services as possible. The hours of operation for the CMF would not change due to HSR activity and construction associated with the HSR project would continue to adhere to legal construction work hours and sound ordinances of the City of Los Angeles. The contractor also would adhere to the requirements set forth by Metrolink and to construction sound levels set by the City of Los Angeles. This information will be included at the 30% project engineering design after the completion of the environmental review process.

784-1394

The commenter states that negative impacts on Elysian Valley residents and workers will be redoubled during HSR construction and requests information regarding the activities at the CMF. As stated in Section 2.5.2.2 of this Final EIR/EIS, the HSR project would reconfigure the CMF while maintaining as many services as possible. The hours of operation for the CMF would not change due to HSR activity and would continue to adhere to legal construction work hours and sound ordinances of Los Angeles. The contractor will adhere to the requirements set forth by Metrolink and to construction sound levels set by the City of Los Angeles and based on local conditions, the Authority may limit nighttime activities to staging equipment and material for the next day's shifts and restricting pile driving.

784-1395

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 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.

Response to Submission 784 (Christine Mills, Los Angeles River Communities for Environmental Equity, August 3, 2020) - Continued

784-1396

The commenter requests that space is preserved for planned off-street bike paths or to accommodate a parallel in-roadway, Class IV, separated bikeway adjacent to where existing or planned Class I bike paths need to be removed. As discussed in Section 3.15.6.3 of this Final EIR/EIS, permanent impacts on current or planned bike paths would require mitigation. Mitigation measure PR-MM#4 would require that the Authority consult with the agency with jurisdiction to identify an alternative route for the continuation of the lost use and functionality of the resource, including maintaining connectivity. The level of classification or specific design of the alternative routes for these resources would be designed in coordination with the officials with jurisdiction. No revisions to this Final EIR/EIS have been made in response to this comment.

784-1397

Refer to Standard Response BLA-Response-Section 3.2 TRAN-02: Permanent Traffic Impacts.

The commenter expresses concern regarding the inclusion of mitigation measures to address LOS. The TTR (Authority 2020) and the Draft and Final EIR/EIS provide information on the HSR Build Alternative's effects on both LOS and vehicle miles traveled (VMT). 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, the Authority uses LOS as part of the NEPA analysis to characterize the transportation setting and consequences of the action.

As stated in the comment, the State has a policy goal to de-emphasize driving and to promote other modes of travel. The HSR project is the single biggest example of the State's commitment to this goal. Although HSR is first and foremost a rail project, it is necessary to make limited street capacity improvements near the station areas so that HSR can be used to its full potential. This is not inconsistent with the State's overall goal. No revisions to this Final EIR/EIS have been made in response to this comment.

784-1398

The commenter requests that the project incorporate design features at stations that support active transportation and improve connections to public transit. As stated in Section 2.3.3 of this Final EIR/EIS, the design of the station areas has not progressed beyond the conceptual stage, but would provide intermodal connectivity. Additionally, as stated in Section 2.5.2.3 of this Final EIR/EIS, stations would be designed to optimize access to the California HSR System, particularly to allow for intercity travel and connections to local transit, airports, highways, and the bicycle and pedestrian networks. No revisions to this Final EIR/EIS have been made in response to this comment.

784-1399

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

The commenter states that residents and businesses displaced by the HSR project need to be compensated in a fair and just way.

Refer to Appendix 2-B in Volume 2 of this Final EIR/EIS which describes impact avoidance and minimization measure SOCIO-IAMF#2, Compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act. The Authority will negotiate on a case-by-case basis with property owners whose land would be acquired by the Authority for the California HSR System. The Authority will acquire land with the payment of just compensation. Just compensation is an amount paid to a property owner for property acquired for public purposes that is not less than the fair-market value of the property acquired, including damages or benefits to the remaining property. In addition, please refer to Appendix 3.12-B, Relocation Assistance Benefits.

784-1400

The commenter expresses their support for the HSR project. Refer to response to comment 784-1388 contained in this chapter of this Final EIR/EIS.

Response to Submission 784 (Christine Mills, Los Angeles River Communities for Environmental Equity, August 3, 2020) - Continued

784-1401

The commenter expresses their opposition to the proposed redirection of money intended to electrify the Central Valley spine to Metrolink. The commenter's opposition to the proposed redirection of money is acknowledged. The Authority does not intend to redirect money for this proposed effort.

Submission 637 (Alison Hahm, NATURAL RESOURCES DEFENSE COUNCIL, June 15, 2020)

Burbank - Los Angeles - RECORD #637 DETAIL

Status : Action Pending
Record Date : 6/15/2020
Submission Date : 6/15/2020
Interest As : Business and/or Organization
First Name : Alison
Last Name : Hahm

Stakeholder Comments/Issues :

Dear California High-Speed Rail Authority Records team,

637-715 | I am reaching out because I would like to access all of the environmental documents for the Burbank to Los Angeles section. Please let me know whether any additional information is required.

Sincerely,

Alison

Alison hahm (SHE / HER)

Access to Nature Legal Fellow, Nature Program

NATURAL RESOURCES DEFENSE COUNCIL

Please save paper.
Think before printing.

Response to Submission 637 (Alison Hahm, NATURAL RESOURCES DEFENSE COUNCIL, June 15, 2020)

637-715

The commenter requested access to the Draft EIR/EIS. On June 15, 2020, the commenter was directed to the online location of the Draft EIR/EIS that is available on the Authority's website. No revisions to this Final EIR/EIS have been made in response to this comment.

Submission 887 (Damon Nagami, Natural Resources Defense Council (NRDC), August 31, 2020)

Burbank - Los Angeles - RECORD #887 DETAIL

Status : Action Pending
Record Date : 9/1/2020
Submission Date : 8/31/2020
Interest As : Business and/or Organization
First Name : Damon
Last Name : Nagami
Attachments : NRDC comments on HSR Burbank-LA DEIR 8.31.20.pdf (268 kb)

Stakeholder Comments/Issues :

Dear California High-Speed Rail Project Team:

On behalf of the Natural Resources Defense Council (NRDC) and Los Angeles River State Park Partners (LARSP), attached please find our joint comments on the Draft EIR/EIS for the Burbank to Los Angeles Section of the California High-Speed Rail project. Thank you for the opportunity to comment and for considering our views.

Best regards,
Damon Nagami
NRDC

DAMON NAGAMI
Senior Attorney, Nature Program
Director, Southern California Ecosystems Project

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Please save paper.
Think before printing.



August 31, 2020

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

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

Dear California High-Speed Rail Project Team:

On behalf of the Natural Resources Defense Council (NRDC), we appreciate this opportunity to submit comments on the Draft EIR/EIS for the Burbank to Los Angeles Section of the California High-Speed Rail project. We are also submitting these comments on behalf of Los Angeles River State Park Partners (LARSP). NRDC and other allied groups have been engaged in this environmental review process for several years, participating on stakeholder working groups, meeting with CHSRA staff and consultants, and providing comments and feedback on alternative analyses and other preliminary documents. We are appreciative that those discussions in some cases may have helped lead to route design changes and mitigation measures that have improved the project and lessened its likely environmental impacts.

As we have expressed many times previously, the concept of high-speed rail (HSR) is promising and could provide a much-needed clean energy alternative for long-distance travel within California. However, from the very beginning, our main concerns with the Burbank to Los Angeles Section have been the project's potential impacts to the urban state parks and low-income communities of color that lie along the proposed route. As you know, our organizations and many others have long supported the movement to restore the natural ecology of the Los Angeles River and bring riverfront green spaces to urban Los Angeles. We are part of a broad coalition of groups and individuals that has played a critical role over decades in envisioning, helping to create, and now nurturing the growth of state parks at the Cornfield site and Taylor Yard – Los Angeles State Historic Park, Rio de Los Angeles State Park, and the future state park at the Bowtie. These are sorely needed open spaces of urban respite for the park-poor communities of color that surround downtown Los Angeles, and we envision these parks as eventually becoming the crown jewels of the downtown area.

NATURAL RESOURCES DEFENSE COUNCIL

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A key cornerstone of this vision is now taking shape as three agencies and entities have announced the formation of the 100-Acre Partnership at Taylor Yard.¹ We are excited about and energized by this joint effort by the City of Los Angeles, California State Parks, and the Mountains Recreation and Conservation Authority to actively coordinate and collaboratively plan what is now the largest contiguous public open space along the River: Rio de Los Angeles State Park (40 acres), the Taylor Yard G1 Bowtie parcel (18 acres), and the Taylor Yard G2 parcel (42 acres).

887-1708

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

887-1709

In addition, given the high level of uncertainty around future available funding for this project, we encourage CHSRA to build maximum flexibility into the Burbank to Los Angeles Section to allow for improvements to the route as technology advances. As the reality of high-speed rail along this section could conceivably have a 20, 30, or 40-year horizon (or more), future innovations might allow for advances such as electrifying Metrolink and/or freight, sharing electrified tracks, reducing the project's footprint to allow trains to go down into a trench through the 100 acres, and/or improving noise walls to safeguard sensitive receptors. In other words, we urge CHSRA to avoid making planning and engineering decisions now that might preclude innovations in the future that would benefit the environment, the state parks, and/or Los Angeles River restoration efforts without contravening the project's overall purpose and need.

887-1710

With these overall concerns in mind, NRDC would like to share a few other specific comments regarding the proposed Burbank to Los Angeles Section:

I. The proposed project could significantly impact parkland intended for passive use.

The Burbank to Los Angeles Section travels adjacent to at least ten parks that host passive and active recreational activities. Yet, the DEIR provides less than a 250-foot buffer zone for at least six of these ten passive use areas (see Table 1). Although the EIR states that "any properties outside the 250-foot threshold would be unlikely to be affected by substantial noise impacts from the project," it should also address whether or how passive-use areas that are less than 250 feet from the project would be affected by the noise, light, and vibration impacts of HSR trains, or how CHSRA would mitigate any such impacts. Because HSR trains are being proposed to run much more frequently than trains currently run through this corridor, the potential impacts described above could be substantial.

¹ 100 Acre Partnership at Taylor Yard, <https://www.100acpartnership.org/> (last visited Aug. 31, 2020).

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Table 1: Passive Use Areas Within 250 feet of Burbank to LA Project Section

1. Five Points Plaza (Figure 3.15-2, Sheet 2)	<ul style="list-style-type: none"> a. 100 feet (approximately). b. Pocket park with passive recreation areas.
2. Confluence Park (Figure 3.15-2, Sheet 5)	<ul style="list-style-type: none"> a. 0 feet (adjacent to the project footprint). b. Passive park with seating and usable open space.
3. Taylor Yard G2 River Park (Figure 3.15-2, Sheet 5)	<ul style="list-style-type: none"> a. 0 feet (within the project footprint). b. A former rail yard that is now divided into three open space parcels that total 100 acres and include the completed 40-acre Rio de Los Angeles State Park, the 18-acre Bowtie parcel, and the 42-acre G2 site along the LA River. c. Taylor Yard includes walking trails to the LA River. (HSR Map ID No. 52). Taylor Yard is 0 feet (within the project footprint). d. In the DEIR, Bowtie is not included in the park description.
4. Robert E. Gross Park	<ul style="list-style-type: none"> a. 9 feet (approximately) from the project footprint. b. This park includes picnic tables and restrooms on-site. c. The DEIR claims that no mitigation measures are required. Yet, the project will impede on well-established passive use areas.
5. Rio de Los Angeles State Park	<ul style="list-style-type: none"> a. 0 feet (within the project footprint). This park includes picnic areas and hiking trails. b. The DEIR questionably asserts that no mitigation measures are required.

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6. Griffith Manor Park	a. 240 feet (approximately) from project footprint. b. The park includes picnic areas, trails, and open space. The DEIR questionably claims that no mitigation measures are required.
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887-1711

The Burbank to Los Angeles Section travels through numerous park-poor environmental justice communities that struggle with extreme heat, high rates of asthma, and language isolation. These disadvantaged communities rely on the few natural spaces that they have to seek relief from rising temperatures, exercise, and connect with friends and neighbors. Reducing noise, vibrations, and lights from passing trains is critical to preserve invaluable community-centered spaces and ensure equitable access to quality parks for all Angelenos.

II. It is unclear whether mitigations are required to compensate for impacts to Rio De Los Angeles State Park.

The DEIR states on page 3.15-62 (Table 3.15-6 Summary by Resource of CEQA Significance Conclusions and Mitigation Measures for Parks, Recreation, and Open Space) that:

"The HSR Build Alternative would **require the permanent acquisition** of a 0.56-acre portion of land from the park. The permanent incorporation would be minor in size and would not adversely affect the activities or features of this resource."

887-1712

Based on correspondence between NRDC and CHSRA on June 25, 2020, we understand that all construction impacts associated with 0.56 acres of Rio de Los Angeles State Park (currently owned by California State Parks) include a (1) temporary construction easement and (2) grading on an existing vegetated slope, which will eventually be restored and revegetated once CHSRA's temporary construction easement expires. If this is the case, CHSRA should clarify in the EIR that such impacts do not constitute a permanent acquisition of 0.56 acres of Rio de Los Angeles State Park. If the 0.56 acres at issue are ultimately acquired or if State Parks is not able to activate this land in the future due to CHSRA's construction activities, then CHSRA would owe State Parks "sufficient compensation or land, or both" as required by the Park Preservation Act of 1971.

III. The 100-Acre Partnership includes the future Bowtie State Park.

As referenced above, NRDC and LARSPP stand with Friends of the Los Angeles River and many other groups and local community members in ongoing efforts to re-wild and restore Taylor Yard, the former rail yard that has long been the prime target for riverfront

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public access, passive and active recreation, riparian habitat, and natural climate and flood management solutions.

887-1713

The Bowtie Parcel is a critical piece of this 100-Acre Partnership. Yet, the DEIR does not acknowledge the Bowtie as a park. CHSRA should identify the Bowtie parcel as a park in the EIR, and acknowledge all current and future parks adjacent to the Burbank to Los Angeles Section to fully assess the project's impact on parkland and surrounding communities.

IV. Building along a floodplain risks harming construction workers, the railway, and those using HSR if a flood were to occur.

887-1714

The CHSRA alternative would be near a FEMA-designated floodplain, which runs the risk of injuring construction workers and those using HSR if a flood were to occur. NRDC encourages CHSRA to fully consider how the final Taylor Yard G2 projects—adjacent to the Burbank to Los Angeles Section—would affect the floodplain and flood risk.² Although the River Park projects' designs have not been finalized, contemplated changes to the river and adjacent lands at Taylor Yard are core components of the City's plans to restore the Los Angeles River and reconnect the River to revitalized parkland.

As of now, the City is still in the process of finalizing the Taylor Yard projects; however, little information about specifics is available to the public or decision makers who are not involved in the project design itself. It would be unknown to those not in the projects' design process how the CHSRA alternative may affect the floodplain. But basing an environmental impact analysis on baseline conditions that do not fully consider the Taylor Yard projects (*e.g.*, the Bowtie Parcel was not included in DEIR) does not give an accurate picture of what the floodplain near the Burbank to Los Angeles Section will be like when the route is operational.

For example, the proposed project is sited adjacent to a section of the Los Angeles River planned to undergo 300 feet of widening, near a parcel modeled by the Army Corps to experience flooding from 100-year storms.³ Construction of the HSR alternative could prevent the City from acquiring land along the Los Angeles River to be used for selective

² CITY OF LOS ANGELES BUREAU OF ENGINEERING, TAYLOR YARD G2 PROJECTS, <https://tayloryardriverprojects.lacity.org/> (last visited Aug. 31, 2020).

³ Gary L. Moore, Strategic Plan 2019-2021, CITY OF LOS ANGELES BUREAU OF ENGINEERING at 27 ("[t]he 42-acre Taylor Yard G2 River Park Project is the 'Crown Jewel' of Los Angeles River revitalization"). See also Carren Jao, Mayor Garcetti Addresses Gentrification Concerns Along L.A. River, KCET (June 2, 2014), <https://www.kcet.org/shows/earth-focus/mayor-garcetti-addresses-gentrification-concerns-along-la-river> ("[t]he purchase of the land has been a 'priority' for Mayor Eric Garcetti, who hailed the council's move Friday. He said the 42-acre parcel is 'the crown jewel in our plan to enliven the Los Angeles River so that Angelenos can reclaim access to its natural wonder and rich history'"); CITY OF L.A., READER'S GUIDE FOR THE LA RIVER ECOSYSTEM RESTORATION PROJECT (Apr. 2016).

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flooding. The Burbank to Los Angeles Section might also push future projects closer to the floodplain, placing construction workers and local community members in harm's way.

The EIR should analyze and craft mitigations and alternative designs to address project impacts on flood control and hydrology within the floodplain in further detail. Future innovations might allow for alternative routes or mitigation strategies that CHSRA has yet to consider. For example, while today's trenching technology may not be considered feasible along the River, future (unknown) trenching techniques might effectively shield sensitive receptors, *e.g.*, parkland and residential areas, from flood risk, noise, light, and vibration from passing trains for years to come. As expressed previously, we encourage CHSRA to avoid finalizing plans before future innovations are discovered.

887-1715

V. CHSRA should acknowledge Los Angeles River restoration plans.

CHSRA should also account for current and future Los Angeles River plans that will restore riparian habitat along the River and reconnect this waterway to parkland. For example, NRDC encourages CHSRA to include in its analyses the completed Upper Los Angeles River and Tributaries Revitalization Plan,⁴ the soon to be released Los Angeles River Master Plan Update,⁵ and future plans for the 100-Acre Partnership at Taylor Yard.⁶ In addition, CHSRA also should consider the over \$30M of County funding that is now available for Upper and Lower Los Angeles River restoration efforts and ensure opportunity areas for housing and ecological restoration are not diminished by the proposed project.

Additional resources such as the Northeast Los Angeles (NELA) Vision Plan⁷ should also be included to ensure the proposed project does not interfere with the NELA community vision. The NELA Vision Plan complements the Los Angeles River Revitalization Master Plan, the U.S. Army Corps of Engineers L.A. River Ecological Restoration Study, and the L.A. City Cornfield Arroyo Seco Specific Plan.

887-1716

VI. CHSRA should consult with low-income communities of color to mitigate potential impacts on aesthetic and visual resources.

Furthermore, the immediate and long-term impacts around construction staging areas should be meaningfully considered. The DEIR has established multiple locations that CHSRA would like to use for temporary construction staging areas. Building these staging

⁴ SANTA MONICA MOUNTAINS CONSERVANCY, UPPER LA RIVER AND TRIBUTARIES REVITALIZATION PLAN, <https://upperlriver.konveio.com/> (last visited Aug. 31, 2020).

⁵ LOS ANGELES COUNTY, LOS ANGELES RIVER MASTER PLAN: Program Environmental Impact Report, <https://pw.lacounty.gov/swq/peir/> (last visited Aug. 31, 2020).

⁶ LA River Park at Taylor Yard Partnership: Letter of Intent, https://f6435985-e6ec-4ea5-b97b-717789c55d50.filesusr.com/ugd/1965cf_3f58f3394e4248d5b61cb850dab3c48b.pdf, (last visited Aug. 31, 2020).

⁷ NORTHEAST LOS ANGELES (NELA) VISION PLAN, <https://kctet.s3.amazonaws.com/pdf/NELA-Vision-Plan-FINAL.pdf> (last visited Aug. 31, 2020).

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887-1716

areas would entail demolishing existing structures, creating vacant lots, and developing new structures for construction equipment. This would introduce major visual changes, with unsightly, visually chaotic aggregations of stored materials and equipment. CHSRA should minimize and mitigate any such visual and aesthetic impacts and, after construction activities are completed, consider conveying these properties to entities committed to building new community-serving resources and replacing current and planned resources (*e.g.*, planned bike paths) that would be impacted by HSR construction.

887-1717

For example, the DEIR warns that "if a feasible alternative route is not identified" the HSR Build alternative could result in a complete loss of connectivity of the planned bicycle network for the (1) San Fernando Bike Path and (2) Metro's Los Angeles River Bike Path. NRDC encourages CHSRA to consult with low-income communities of color living near these planned bike routes to plan and design alternative routes and compensate the surrounding communities for this potential loss.

887-1718

Community-based organizations, community members, and government agencies have been collaborating for years to realize the Los Angeles River Park Project and 100 Acre Vision, in hopes of strengthening community connection to re-wilded spaces in Los Angeles. NRDC encourages CHSRA to work with stakeholders and community advocates to help realize this shared vision.

887-1719

VII. Anti-displacement safeguards should be included to protect community cohesion.

NRDC also encourages CHSRA to more explicitly acknowledge the communities of color and low-income communities that would be disproportionately impacted by the Burbank to Los Angeles Section. As such, CHSRA should craft long-term solutions to compensate communities for the proposed project's impact on schools, local businesses, and community cohesion.

887-1720

NRDC is concerned that the DEIR has overlooked the proposed project's potential impacts on affordable housing developments, including opportunity sites for affordable housing rehabilitation. NRDC urges CHSRA to craft additional "displacement safeguards" for communities impacted during the construction phase and following construction of the proposed project. Such safeguards could include (1) creating an affordable housing land bank, (2) relocating impacted residents during construction, and (3) ensuring the right to return for those impacted following construction.

The EIR should also include resources like the Los Angeles County Board of Supervisors' report *Prioritizing Affordable Housing in Areas with Displacement Risk*. This report as well as various tools identified in this report would be a useful guide for understanding how public infrastructure investments contribute to housing displacement and gentrification, as well as determining how to prevent these harmful patterns. Large-scale public infrastructure projects should respond to the actual needs of the communities

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887-1720

in which they are built, and should not worsen existing needs or ignore the people already living there.

Conclusion

887-1721

While high-speed rail may have the potential to lessen the impacts and effects of climate change on California's communities, economy, and environment, we remain concerned about the Burbank to Los Angeles Section's potential impacts on the state parks located along the route, as well as the numerous low-income communities of color there that are already nature-deprived and unduly burdened by environmental pollution. We urge CHSRA to address our concerns outlined above, while also reaching out to impacted communities to better understand local concerns and ensure equitable access to parkland, affordable housing, and community resources for those that may be disproportionately impacted by HSR construction and operation.

Structural inequalities and institutional racism have deprived low-income communities of color of the myriad physical, mental, and social benefits that equitable access to nature and quality affordable housing provide in major cities like Los Angeles. These existing shortcomings have only been exacerbated by the COVID-19 pandemic and could be reinforced by large public infrastructure projects like HSR if impacted communities are not given a seat at the table to craft community benefits agreements and mitigation measures that offset project impacts and preserve community resources.

We appreciate this opportunity to comment and look forward to engaging in CHSRA's outreach efforts and discussions with Los Angeles-based community partners and impacted community members.

Very truly yours,



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CC: Office of Congressman Adam Schiff

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Office of Congressman Jimmy Gomez
Office of State Senator Maria Elena Durazo
Office of Assembly Member Wendy Carrillo
Office of Mayor Eric Garcetti, City of Los Angeles
Office of Supervisor Hilda Solis, County of Los Angeles
Mark A. McLoughlin, Director of Environmental Services, CHSRA
Jill Sourial, The Nature Conservancy

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887-1708

This comment is an opening statement for the detailed comments that follow. The commenter urges the Authority to fully consider the comprehensive planning efforts around the 100 acres, and to work collaboratively with the 100-Acre Partnership to address and mitigate any and all project impacts on the public's current and future access to and enjoyment of the parkland and open space. Refer to response to comments 887-1709 through 887-1721 contained in this Chapter of this Final EIR/EIS. The Authority will continue to coordinate with the officials with jurisdiction through the development of the final project design.

887-1709

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

The commenter encourages the Authority to avoid making planning and engineering decisions now that might preclude innovations in the future that would benefit the environment, the state park, and/or Los Angeles River restoration efforts without contravening the project's overall purpose and need. The HSR alignment evaluated in this Final EIR/EIS has been refined through the Tier 1 and Tier 2 analyses to avoid impacts on important existing and planned resources to the extent feasible while also meeting overall project objectives, as discussed in more detail in BLA-Response-Chapter 2 Alt-01: Alternatives. 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 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. Therefore, the HSR Build Alternative does not preclude innovations in the future that would benefit the environment and the Authority will continue to coordinate with agencies with jurisdiction as the project progresses.

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887-1710

The commenter expresses concern regarding noise, light, and vibration impacts on passive-use areas less than 250 feet from the proposed HSR Build Alternative footprint, specifically in reference to Five Points Plaza, Confluence Park, Taylor Yard G2 River Park, Robert E. Gross Park, Rio de Los Angeles State Park, and Griffith Manor Park. As described in Section 3.15.6.3 of this Final EIR/EIS, Impact PK #5, addressed changes to park or recreation facility use or character due to operation of the HSR Build Alternative resulting from operational noise, vibration, or visual impacts. As stated in Section 3.15.6.3 of this Final EIR/EIS, based on the Burbank to Los Angeles Project Section Noise and Vibration Technical Report (Authority 2020), noise levels after HSR Build Alternative implementation would not result in substantial changes to facility character or use at recreational facilities. As described in Section 3.4, Noise and Vibration, of this Final EIR/EIS, parks are considered Category 3 for sensitive receptors as institutional land uses with primarily daytime use. No significant impacts to parks were identified for operational noise and vibration. Regarding visual impacts from operation, visual impacts would occur at Rio de Los Angeles State Park and Griffith Manor Park. With implementation of AVR-MM#3, the contractor would incorporate the Authority-approved aesthetic preferences for nonstation structures into final design and construction to reduce visual impacts during operation. Other resources in the RSA that might have views of the HSR Build Alternative would have no operations impact related to visual changes due to a neutral effect on visual quality because of compatibility with the existing railroad corridor. This includes Five Points Plaza, Confluence Park, the Proposed Taylor Yard G2 River Park, the proposed Bowtie Parcel, and Robert E. Gross Park. The impact under CEQA related to the physical deterioration of nearby recreational facilities resulting from changes to the use and character of recreational facilities from the HSR Build Alternative would be less than significant. This includes both passive and active recreational resource uses. The comment accurately states the Bowtie Parcel was not included in the Draft EIR/EIS. This Final EIR/EIS has been updated to include the Bowtie Parcel as a recreational resource in Section 3.15. However, as the noise measurements taken did not identify a significant impact at the proposed Taylor Yard G2 River Park, and the proposed Bowtie Parcel would be located immediately adjacent to the proposed Taylor Yard G2 River Park and at the same distance from the HSR Build Alternative footprint, impacts related to operational noise and visual character would be less than significant under CEQA for the proposed Bowtie Parcel.

887-1711

The comment states that the Burbank to Los Angeles Project Section travels through numerous park-poor environmental justice communities and reducing noise, vibration, and lights from passing trains is critical to preserve invaluable community-centered spaces and ensure equitable access to quality parks. As discussed in Section 3.12.4.2, the Authority has incorporated IAMFs into the HSR Build Alternative to help avoid and minimize impacts. LU-IAMF#3 would ensure that construction and staging areas used temporarily during construction would be returned to a condition equal to the pre-construction staging condition. The HSR Build Alternative's temporary impacts related to noise would be minimized through compliance with NV-IAMF#1, which requires documentation of how federal guidelines for minimizing noise and vibration would be employed near sensitive receptors. The HSR Build Alternative's temporary impacts related to air quality would be minimized through compliance with AQ-IAMF#1, which requires the preparation of a fugitive dust control plan identifying the features that, at a minimum, would be implemented during ground-disturbing activities, and AQ-IAMF#2, which requires the use of low-volatile organic compound paint during construction. Implementation of TR-IAMF#2, which requires the preparation of a construction transportation plan, would minimize access disruptions on 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. SS-IAMF#2 requires the preparation of a Safety and Security Management Plan to protect construction workers and the public, and it would minimize impacts on public safety from construction of the HSR Build Alternative. Implementation of these IAMFs would fully minimize the potential for temporary construction impacts to disrupt community facilities, and no mitigation would be required to address the potential for construction of the HSR Build Alternative to temporarily disrupt community facilities. In addition, as described in Sections 5.6.3.1 and 5.6.3.2, of this Final EIR/EIS, the Authority will implement several additional IAMFs (EJ-IAMF #2, EJ-IAMF #3, and EJ-IAMF #5) that were not identified in the Draft EIR/EIS. EJ-IAMF#2 would require the Authority to seek input on aesthetic preferences of visually impacted EJ communities within the EJ Resource Study Area to minimize any adverse construction effects relating to aesthetics and visual resources on low-income and minority populations. EJ-IAMF#3 would require the operation noise technical report to include an assessment of whether remaining severe noise impacts, after application of recommended noise treatments and mitigation, may adversely impact EJ communities and the assessment of whether any

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887-1711

additional practicable measures may be undertaken to avoid, eliminate, or reduce any adverse noise impacts. EJ-IAMF#5 would require the Authority to seek input from impacted EJ communities on the relocation of planned or existing bike paths located within EJ communities.

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

Refer to Section 3.19.8.14, of this Final EIR/EIS for an evaluation of the HSR Project's cumulative impacts on parks, recreation, and open space. As described, planned projects, including adjacent HSR project sections, could result in access, noise, and visual impacts on park and recreational resources. Noise and visual impacts from the passing high-speed trains for the HSR Build Alternative and adjacent HSR project sections would be short in duration and would not contribute to cumulative impacts.

Although operation of the HSR Build Alternative would result in significant unavoidable access impacts on one planned bike path and visual impacts on one park, none of the other cumulative projects, including the adjacent HSR project sections, would result in access or noise impacts on these same recreational resources. There would not be a cumulative access, noise, or visual impact on parks and recreational facilities to which the HSR Build Alternative would contribute.

887-1712

The commenter states the impacts to Rio de Los Angeles State Park described in the Draft EIR/EIS should be clarified to state that acquisition of park property is proposed and compliance with the Park Preservation Act is required. Section 3.15.6.3 of this Final EIR/EIS has been revised to clarify that permanent impacts to Rio de Los Angeles State Park would only occur in the form of permanent easements or grading, and that no permanent acquisition of park property would be required for the HSR Project resulting in a permanent loss of parkland. There would be no loss of access to, or inability to use, any parks as a result of the HSR Build Alternative. The discussion in Table 3.15-6 has been revised in this Final EIR/EIS to replace the words "acquisition" and "incorporation" with "modifications" to clarify the impact to Rio de Los Angeles State Park stated in Impact PK #3, which states: "Construction of the HSR Build Alternative would require permanent modifications to 0.56 acre of land along the southern boundary of the park. The existing access road would be lowered adjacent to the park, which would require grading of the existing vegetated slope within the park boundary." Furthermore, these improvements would not remove any existing recreational facilities or amenities and would not adversely affect the activities, features, or attributes of the properties. Because no acquisition of park property would be required, the requirements of the Park Preservation Act would not apply.

887-1713

The commenter expresses concern that the HSR alignment would impact current and future parks adjacent to the Burbank to Los Angeles Project Section, including efforts to re-wild and restore Taylor Yard, including the Bowtie Parcel. Section 3.15 of this Final EIR/EIS has been revised to include a discussion of the G1 Parcel (Bowtie Parcel). Therefore, all existing and planned parks within the RSA are analyzed in the impact analysis in Section 3.15.6.3 of this Final EIR/EIS.

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887-1714

The commenter states that the project would risk injuring construction workers and HSR users were a flood to occur. While the HSR Build Alternative would involve construction within the 100-year floodplain, construction activities would cease during storm events. As discussed in Section 3.8.6.3 under Impact HWR #7 of this Final EIR/EIS, construction activities within floodplains would be short-term, and equipment and materials would be required to be stored outside of the floodplain to minimize the potential flood risk. Additionally, consistent with typical Storm Water Pollution Prevention Plan (SWPPP) requirements, weather conditions would be monitored for heavy storms (and potential flood flows) so that construction equipment can be relocated out of the floodplain prior to the storm event. Additionally, as it is not feasible or practical to continue construction during storm events, all construction activities would cease during storm events. As such, construction workers would not be exposed to risk from flooding during storm events. Additionally, as detailed in Section 3.8.6.3 under Impact HWR #12 of this Final EIR/EIS, no operation or maintenance activities are anticipated to be required within floodplains. Additionally, the tracks and stations would be elevated above the floodplain and would therefore not expose passengers to flooding risk during storm events. As such, workers and riders of the HSR would not be exposed to risk from flooding during storm events.

This comment also states that the Authority should consider how the Taylor Yard G2 project would affect the floodplain and flood risk. Section 3.19 of this Final EIR/EIS has been revised to include the G1 Parcel (Bowtie Parcel) as a separate cumulative project. The impact analysis in Section 3.19 already includes impacts to the Proposed G2 Taylor Yard River Park. Although the Bowtie Parcel was not listed in the Draft EIR/EIS as a separate cumulative project, the parcel itself was considered in the cumulative hydrology and water resources analysis in Section 3.19.8.8. As discussed in Section 3.19.8.8 of the Draft EIR/EIS and this Final EIR/EIS, the HSR Build Alternative would neither preclude nor conflict with the restoration activities proposed for the Los Angeles River. While there would be some geographical overlap between the HSR Build Alternative and the Los Angeles River Ecosystem Restoration Project, specifically at Taylor Yard and the Bowtie parcel, the HSR Build Alternative would not preclude or conflict with the restoration activities planned for the Los Angeles River. Additionally, the HSR Build Alternative would not encroach on the 100-year floodplain in the vicinity of the Taylor Yard projects.

This comment further states that the project should analyze and include mitigation and

887-1714

alternative designs to address impacts on flood control and hydrology within floodplains. The Authority has reviewed flood control alternatives and developed the HSR Build Alternative design in a manner that will increase the capacity of flood control facilities in some areas through the reconstruction of facilities within the project alignment. Other facilities will be reconstructed to existing condition hydraulic capacity. These designs comply with the requirements of the Los Angeles County Flood Control District Hydraulic Design Manual, which requires the design of the drainage facilities to maintain the existing hydraulic grade when joining a new or realigned facility to the existing facility. Floodplain impacts from the HSR Build Alternative was discussed in Section 3.8.6.3 of this Final EIR/EIS under Impact HWR #8. The HSR Build Alternative would include flood protection measures that would minimize effects on the vertical profile, horizontal extent, flow patterns, and peak flows of 100-year floodplains. Project features include the development and implementation of a Flood Protection Plan that would include specific measures to minimize development within floodplains, prevent increases in 100-year water surface elevations by more than 1 foot, and optimize bridge designs to minimize backwater (as required by HYD-IAMF#2).

As described above, the Authority would design the shape and alignment of piers proposed within the floodplain to minimize adverse hydraulic effects. The HSR Build Alternative would also comply with the requirements set forth in U.S. Executive Order (USEO) 11988, Floodplain Management and FEMA regulations. USEO 11988 requires compliance with the National Flood Insurance Program, which aims to reduce the effect of flooding on private and public structures. FEMA regulations require a floodplain analysis to demonstrate that projects are prevented from increasing the base flood elevation by greater than 1 foot in floodplains or substantially changing the floodplain limits. Additionally, the Authority would obtain a Conditional Letter of Map Revision/Letter of Map Revision from FEMA. The Conditional Letter of Map Revision would serve as FEMA's acknowledgement that the HSR Build Alternative would affect the base flood elevation or modify the boundaries of a floodplain. The Letter of Map Revision would officially revise the flood insurance rate map (FIRM) to reflect the change in the floodplain. Modifying the FIRM ensures that future development can account for the change in the conditions of the floodplain to reduce the risk of flooding to future development proposed in the area. Through compliance with HYD-IAMF#2, the requirements set forth in USEO 11988, and FEMA requirements, permanent effects from construction within floodplains would be minimized, and mitigation measures are

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not required.

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The commenter suggests that several projects related to the Los Angeles River be included in Section 3.19, Cumulative Impacts. The cumulative impacts section presents an analysis of the cumulative effects of implementing the HSR Build Alternative, which, in combination with other past, present, and reasonably foreseeable future projects, may result in cumulative environmental impacts. For the purposes of the Draft EIR/EIS analysis, “reasonably foreseeable future projects” are those likely to occur within the 2040 planning horizon for the HSR Project, including adjacent HSR project sections. As the commenter points out, not all the projects mentioned in the comment are completed, nor do they have publicly available environmental or project documents yet. Therefore, at the time that project studies for the Draft EIR/EIS were initiated in 2015, only certain projects were considered reasonably foreseeable.

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

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The commenter states that mitigation should be included to minimize and mitigate construction impacts related to visual quality and that the Authority should consult with low-income communities of color to create such mitigation. Chapter 9 of this Final EIR/EIS provides information regarding the outreach activities undertaken, which have been ongoing since 2014 and include low-income communities of color. Additionally, Section 5.5 of Chapter 5, Environmental Justice, provides more detailed information on outreach to minority and low-income persons. These meetings provided opportunities for low-income communities of color to provide comments and input regarding the proposed project and to talk one-on-one with Authority staff. Additionally, the Draft EIR/EIS does include such a mitigation measure: AVQ-MM#1 (Minimize Visual Disruption from Construction Activities). As discussed in Section 3.16.7.1, this mitigation measure includes provisions to: limit the removal of buildings to only those that would conflict with project components; preserve existing vegetation, particularly vegetation along the edge of construction areas that may help screen views; and not locate construction staging sites within the immediate foreground distance (0 to 500 feet) of existing residential neighborhoods, recreational areas, or other land uses that include highly sensitive viewers. Additionally, the Authority has striven to limit property impacts, and parcels that are identified for temporary construction easements or staging areas, within the footprint to those that typically do not require the use of the entire parcel or require demolition of existing structures. Therefore, the commenter’s concerns are addressed in the Draft EIR/EIS and no revisions to this Final EIR/EIS were made in response to this comment.

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The comment requests minimization and mitigation of visual and aesthetic impacts after construction activities are completed. As described in Section 3.15.6.3 of this Final EIR/EIS, AVR-IAMF#1, AVR-IAMF#2, and AVR-MM#3 would be implemented to address visual impacts after construction through project design features. Through implementation of AVR-IAMF#1, the Authority is seeking to balance a consistent aesthetic throughout the state with the local context for the nonstation structures in the Burbank to Los Angeles Project Section. Through implementation of AVR-IAMF#2, the Authority would consult with local jurisdictions on how best to involve the community in the process and would work with the contractor and local jurisdictions to review designs and local aesthetic preferences and incorporate them into final design and construction. With implementation of AVR-MM#3, the contractor would incorporate the Authority-approved aesthetic preferences for nonstation structures into final design and construction to reduce visual impacts during operation. No revisions to the Final EIR/EIS have been made in response to this comment.

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The commenter states that organizations and agencies have been collaborating for years to realize the Los Angeles River Park Project and 100 Acre Vision and encourages the Authority to work with stakeholders to help realize this vision. The Authority is supportive of this project and has designed the Burbank to Los Angeles Project Section of the HSR project to avoid and/or minimize impacts to parks and the Los Angeles River to the greatest extent feasible. The Authority will continue to work closely with stakeholders as the project progresses into final design and construction. The Authority is appreciative of the ongoing coordination with Los Angeles River stakeholders that has occurred since 2014, including the participation of the Los Angeles River Working Group and the Los Angeles River Cooperation Committee. Community and stakeholder groups represented at those meetings included the Natural Resources Defense Council, the Trust for Public Land, Friends of the Los Angeles River, the Arroyo Seco Foundation, and the River Project. In addition, the Authority has met with the Los Angeles River Revitalization Corp and the Alliance of River Communities in the course of project development. A complete log listing all community meetings is found at the back of Chapter 9 in this Final EIR/EIS.

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

The comment states that the Authority should more explicitly acknowledge the minority and low-income communities that would be disproportionately impacted by the HSR Project and states that the Authority should craft long-term solutions to compensate communities for the proposed project's impact on schools, local businesses, and community cohesion.

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.

Refer to Section 3.19.8.17 of this Final EIR/EIS for an analysis of the HSR Project's cumulative impacts related to environmental justice. The HSR Build Alternative would not contribute to disproportionate, adverse cumulative impacts on low-income and minority populations.

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.

Applicable mitigation measures are listed in Section 5.8.2, Mitigation Measures, of Chapter 5, Environmental Justice, of this Final EIR/EIS. These measures described in Section 3.2.7, Section 3.3.7, Section 3.4.7, Section 3.13.7, Section 3.15.7, Section 3.16.7, and Section 3.17.8 of this Final EIR/EIS. The mitigation measures would be

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applied to all populations, including low-income and minority communities.

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The commenter expresses concern that the Draft EIR/EIS has overlooked the HSR Project's potential impacts on affordable housing developments, including opportunity sites for affordable housing rehabilitation. The commenter urges the Authority to craft additional "displacement safeguards" for communities impacted.

As described in Section 3.12.3.1, Impact SOCIO #6 of this Final EIR/EIS, residential displacements would include six single-family residences and six multifamily residences for the entire project section. None of the full-parcel residential acquisitions is listed on the database of housing in Los Angeles that is subject to affordability covenants, which was prepared and updated pursuant to Assembly Bill 987. No Impact Avoidance and Minimization Features were applied, and no Mitigation Measures are required. The Authority is a transportation agency and does not have the implementing regulations required to purchase property that is not necessary for its right-of-way.

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This comment is a closing statement that provides a summary of the comments provided. Refer to responses to comments 887-1708 through 887-1720, contained in this chapter of this Final EIR/EIS, for detailed responses to those comments. The Authority will continue to coordinate with the Natural Resources Defense Council as the project continues.