



PALMDALE

a place to call home

April 28, 2020

STEVEN D. HOFBAUER
Mayor

RICHARD J. LOA
Mayor Pro Tem

LAURA BETTENCOURT
Councilmember

AUSTIN BISHOP
Councilmember

JUAN CARRILLO
Councilmember

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

RE: DRAFT EIR / EIS COMMENTS FOR THE BAKERSFIELD TO PALMDALE PROJECT SECTION

Dear Draft EIR / EIS Team:

Thank you for allowing the City of Palmdale to review and comment on the Draft Environmental Impact Report / Environmental Impact Statement for the California High-Speed Rail Bakersfield to Palmdale Section. Staff comments on the document are attached hereto.

Please contact Senior Planner Megan Taggart at mtaggart@cityofpalmdale.org / (661) 267-5213 or myself at mbehen@cityofpalmdale.org / (661) 267-5337 if you have any questions regarding the information provided.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Behen".

Michael "Mike" Behen
Deputy City Manager

ATTACHMENT 1

ec: Michael "Mike" Behen, Deputy City Manager
Chuck Heffernan, Director of Public Works
Ruben Hovanesian, Senior Civil Engineer
Bill Padilla, City Engineer
Drew Pletcher, Deputy Director of Economic and Community Development
Carlene Saxton, Deputy Director of Economic and Community Development

Auxiliary aids provided for

communication accessibility

upon 72 hours notice and request.

ATTACHMENT 1

PAGE OR EXHIBIT	DOCUMENT / COMMENT
	PROPOSED DRAFT EIR / EIS GENERAL COMMENTS
General	Please note that the Avenue M LMF site is partially located within the City of Palmdale. Please ensure that this is specified throughout the document.
General	Palmdale requests that Palmdale Boulevard be evaluated as an underpass as part of this EIR. This intersection was thoroughly evaluated through a joint effort by the City and LA Metro and an underpass was determined to be the most efficient design. The City has been on record for an extended period of time regarding this request.
General	Palmdale requests that Technology Drive be designed to connect under Sierra Highway and be evaluated as part of this EIR. The City has been on record for an extended period of time regarding this request.
General	Palmdale requests that the Authority re-evaluate better, less impactful design options for all remaining grade separations located within the City – and evaluate these options as part of this EIR. The City has been on record for an extended period of time regarding this request.
General	Palmdale requests that the Authority provide funding as a form of mitigation to update the City's General Plan/General Plan EIR and Master Plan of Drainage due to various project-related changes/impacts associated with the high speed rail project.
General	Palmdale requires that all proposed right-of-way acquisitions do not leave remnant, non-conforming and non-usable parcels.
General	Palmdale requests additional details on noise impacts and noise mitigation.
General	Palmdale requests additional details on visual impacts and visual impact mitigation.
General	Palmdale requests that the Authority reflect station design planning that is consistent with the Palmdale Transit Area Specific Plan (PTASP). The plans currently presented by the Authority are grossly inconsistent with the City's current plans.

CHSR Draft EIR / EIS (Bakersfield to Palmdale)
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General	Palmdale requests that the Authority coordinate with VTUSA (Virgin Trains USA), Metrolink, Metro, AVTA (Antelope Valley Transit Authority), Greyhound, Amtrak, etc. regarding the design and future development of an integrated, multi-modal high speed rail station.
General	Palmdale requests that the Authority coordinate with Union Pacific Railroad (UPRR) to collocate with the intent of reducing right of way and existing/future land use impacts.
General	Palmdale requests that the Authority coordinate with VTUSA regarding connecting the XpressWest high speed rail system with the CHSRA system. The rail designs associated with the "Wye" connection from XpressWest to the CHSRA, are geometrically inconsistent.
General	Palmdale requests additional evaluation regarding soil stabilization as it relates to avoidance of airborne illnesses, such as Valley Fever. Additional details on proposed mitigation is requested.
General	Palmdale requests that streets, intersections, bicycle lanes, trails, etc., are designed in compliance with the PTASP and either the current or future City General Plan (whichever is applicable at the time of construction).
General	This project encroaches on the existing Palmdale Transportation Center (PTC) and the EIR/EIS does not include any discussions regarding how or where this multi-modal transportation center will be relocated and/or integrated into the future multi-modal high speed rail station.
SECTION 1 – PROJECT PURPOSE, NEED AND OBJECTIVES	
Page 1-3	To ensure clarity and consistency, please spell out the first use of the acronym FRA.
Page 1-3	Please remove the letter 'a' from the sentence 'After completing the Statewide Program EIR / EIS, the Authority and FRA prepared a second Program EIR / EIS to identify <u>a</u> corridor and station locations for the HSR connection between the Pass....'
Page 1-27	This page indicates that periodic snowfall in the Antelope Valley presents hazards for motorists. Although snow does fall periodically in the Antelope Valley, snowfall is more common in Tehachapi and the document should be revised to reflect this.

PAGE OR EXHIBIT	DOCUMENT / COMMENT
Page 1-32	Section 1.2.4.5 – Joshua Tree Woodland: This subsection indicates that trees are not protected and may be removed. This is incorrect. Palmdale Municipal Code Section 14.04 requires preparation and approval of a Native Desert Preservation Plan prior to removal or relocation of any Joshua trees.
Page 1-38	Section 1.4.1 – High Desert Corridor: Please revise the font color of the sentences ‘The High Desert Corridor project would serve as an HSR feeder service between Palmdale and Victorville. Toward this goal, studies have been conducted to identify...’
	SECTION 3 – STATION PLANNING, LAND USE AND DEVELOPMENT
Page 3.13-9	Please replace the word ‘must’ with ‘shall’ in the sentence, ‘The Authority must comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act, as amended...’
Page 3.13-10	Please replace the word ‘would’ with ‘shall’ in the sentence, ‘Before any acquisitions occur, the Authority would develop a relocation mitigation plan...’
Page 3.13-10	Please replace the word ‘would’ with ‘shall’ in the sentence, ‘...the relocation mitigation plan would be written in a style that also enables it to be used as a public...’
Page 3.13-11	Please replace the word ‘would’ with ‘shall’ in the sentence, ‘The relocation mitigation plan would include the following components:’
Page 3.13-11	Please replace the word ‘would’ with ‘shall’ in the sentence, ‘The Authority would establish and administer a farmland consolidation program to sell remnant parcels...’
Page 3.13-16	Please revise the word ‘north’ to ‘south’ within the sentence, ‘...Palmdale Transportation Center would be expanded to the north to accommodate the HSR system.’
Page 3.13-16	The statement, ‘Planned land uses near the Palmdale Station site include commercial and industrial uses and a specific plan,’ is inaccurate since there are also residential and recreational uses planned in the vicinity. Please revise.
Page 3.13-22	Indicates that the conversion of 528 acres of land to transportation of use is required, but Page 3.13-23 indicates 529 acres and Page 3.13-28 indicates 528 acres. Please clarify.

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Page 3.13-23	Impact LU #5 indicates 'Operation of the Palmdale Station is not anticipated to result in increased noise levels experienced by any adjacent land uses,' but the previous sections indicate the opposite. In addition, this impact indicates that the operation would not result in permanent conflicts because it 'would be designed to complement the surrounding land uses.' Please describe how.
	APPENDIX 2-E IMPACT AVOIDANCE AND MINIMIZATION FEATURES
Page X-4	Replace the word 'would' with 'shall' throughout.
Page X-5	Replace the word 'will' with 'shall' throughout.
Page X-6	Replace the word 'will' with 'shall' throughout.
Page X-8	Please discuss and provide additional detail regarding the required Native Desert Vegetation Plan.
	SUMMARY
Page S-29	Please remove the word 'at' within the sentence, 'Additionally, some of the direct impact area would occur <u>at</u> at-grate and cut locations that have already been heavily modified...'
Page S-30	While Joshua Trees are not a State or Federally protected species, the City of Palmdale requires preparation and approval of a Native Desert Vegetation Plan to relocate trees, as required by the Palmdale Municipal Code. Please include discussion of this requirement and process.