



April 28, 2020

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

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

Dear California High-Speed Rail Authority:

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

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

General Comments

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

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

[https://metrolinktrains.com/globalassets/about/engineering/scrra\\_design\\_criteria\\_manual.pdf](https://metrolinktrains.com/globalassets/about/engineering/scrra_design_criteria_manual.pdf).

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

### General Design

1. The Draft EIR/EIS notes that Sierra Avenue will be realigned for a stretch of 4.5 miles. Maintenance access must be provided for Metrolink personnel to main tracks and signals within this stretch of roadway realignment. CHSRA may need to provide maintenance underpasses beneath CHSRA/UPRR tracks to provide access to tracks where crossing at-grade is prohibited (Summary – Section 5.2.4, pg. 19).
2. Section AA shows a 24-foot wide drainage channel that appears to conflict with the proposed pedestrian underpass to the Metrolink platform (Alignment Plans – Part 1 of 4, TT-B3017, pg.32). Please clarify and ensure that such conflict does not exist.
3. In the Alignment Plans, no turnout size is shown for Metrolink. Please ensure the designs show a Number 24 turnout at a minimum. (Alignment Plans – Part 4 of 4, TT-D1253, pg. 30)
4. Bridge columns within 25 feet of centerline of Metrolink track will require pier protection per SCRRA's 2016 Grade Separation Guidelines (Section 7.2 and 7.7).

The requirements are available at:

[https://metrolinktrains.com/globalassets/about/engineering/scrra\\_grade\\_separation\\_guidelines.pdf](https://metrolinktrains.com/globalassets/about/engineering/scrra_grade_separation_guidelines.pdf).

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

### Track Infrastructure

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

### Lancaster Station

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

### Metrolink Lancaster Layover and Future Maintenance Facility

1. The Metrolink Layover Facility appears to be missing from the drawings in the appendix. This Layover Facility is critical to Metrolink's operations on the Antelope Valley Line and its capabilities must be sustained without interruption throughout construction – whether in its current location or if it is relocated to an expanded facility elsewhere.
2. Due to the service level projections from CHSRA and the associated demands on the infrastructure, CHSRA needs to provide for a larger maintenance facility for Metrolink north of the Metrolink Lancaster Station that preserves the functions of the existing Layover facility and expands its capacity to accommodate the larger fleet associated with expanded service prior to the start of CHSRA operations.

### Palmdale Station

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

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

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

Sincerely,



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