

April 16, 2020

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

SUBJECT: California High Speed Rail EIR Comments

Dear California High-Speed Rail Authority:

The City of Lancaster (City) has reviewed all relevant Environmental Impact Report (EIR) Documents. City staff would like to thank the High-Speed Rail Authority (HSRA) for the opportunity to provide written feedback on the EIR. Development of the EIR has been on-going for the past several years and throughout this process, HSRA staff have regularly had check-in meetings with City staff and routinely addressed the public within the Antelope Valley. The City would like to thank the HSRA for collaborating with the City and the residents of the Antelope Valley during this process. Overall, the City would like to see this project move forward; however, before doing so, the City would like the comments below addressed. The following is a list of the City's comments:

General

1. The City has reviewed the project alternatives presented in the EIR. Based on this review, the City concurs with HSRA's selection of Alternative 2 as the preferred alternative. The City does not support Alternative 5. Alternative 5 would dramatically increase the project's impacts within the City of Lancaster. These include 115 additional residential units, 19 additional businesses and 3 additional community facilities (which includes Lancaster's Sheriff Station, and the University of Antelope Valley Campus). The City cannot accept Alternative 5 because of the significant increase in project impacts.
2. The EIR presents two locations for the proposed MOWF and the proposed LMF. The locations are denoted as Lancaster North B and Avenue M LMF Zone. The City supports locating the MOWF at the Lancaster North B location and the LMF at the Avenue M LMF Zone. This approach provides a balance of facilities throughout the Antelope Valley and does not concentrate the future HSRA employees in one location. This will help balance the use of surrounding support businesses and land uses. The City requests the EIR be updated to reflect this comment.
3. All proposed uses at the Avenue M LMF Zone shall be coordinated with Plant 42. These future uses shall meet any height, noise, distance, and/or any other requirements that may be imposed on the HSRA by Plant 42 due to the sensitive nature of Plant 42's business operations.
4. Some of the information in the document is out of date. For example, Table 2-6 on page 2-67 lists planned residential developments based on information obtained in 2013 and 2016. These developments are between .3 and 1.1 miles away from the project site. However, it doesn't list residential developments that have been approved and which are located substantially closer (e.g., SWC of Sierra Hwy and I and the NEC of I and Division). The EIR shall be updated to

include all approved uses. HSRA staff shall coordinate with the City's Development Services staff to obtain all the necessary updates that shall be included.

5. The tables and text are not consistent in the information presented. For example, the text on page 3.2-51 references the 37 schools identified in table 3.2-13. However, that table only lists 22 schools. All text shall be updated to correct these issues.

Transportation

1. Based on conversations with HSRA staff, it is the City's understanding that all future Brightline Virgin trains either heading north from Victorville or coming from the north heading toward Victorville will bypass the proposed HSRA station in Palmdale. The City understands the importance to the Antelope Valley of creating a location to access these future north bound trains. As such, the City requests that a proposed Brightline Virgin Station be included in the EIR and all impacts studied. The station shall be located at Avenue D. This location will provide excellent SR 14 and SR 138 access which will allow the location to become a hub for future train users.

In addition to the HSRA station at Avenue D, the City requests that the HSRA study the relocation of the existing Metrolink Station at Sierra Highway and Lancaster Boulevard to the Avenue D location. The co-location of a Metrolink and HSRA Station will create a transportation hub with excellent access to both SR 14 and SR 138. This will provide great train access to the entire north western Antelope Valley where tremendous growth is modeled in the next 25 years. This future station location also provides close proximity to the proposed Lancaster North B MOWF Site which will allow for shared office amenities for HSRA authority staff, Metrolink Staff, and Brightline Virgin Staff.

The proposed Avenue D location shall also be studied for the inclusion of a future Antelope Valley Transit Authority (AVTA) Bus Transfer Station. This will provide a transfer location for users to move easily and rapidly back and forth between bus and train. This transfer station shall include the necessary charging amenities required by AVTA to properly service this location.

2. The City does not support the closing of Lancaster Boulevard to thru traffic at Sierra Highway as proposed in the current EIR. City staff have on numerous occasions discussed this with HSRA staff and to date they have failed to mitigate the City's concern on this issue. The City requires that Lancaster Boulevard remain open to thru traffic. In 2010, the City completed a road diet project on Lancaster Boulevard between 10th Street West and Sierra Highway. This project significantly improved the environment of the area which has spurred significant economic development in this area. "The Blvd", as Lancaster residents affectionately refer to this area as, is heavily reliant on vehicular, pedestrian, and bicycle access. If the eastern access point was severed by the future HSRA, this would have significant economic and level of service impacts to this entire area. As such, the City demands the HSRA study a future below grading crossing of Lancaster Boulevard with the future HSR tracks. In most cases, below grade crossings have a smaller footprint than above grade crossing and should therefore provide a less impactful crossing solution at this location.

All proposed designs for the future Lancaster Boulevard connection shall be coordinated with the City's Development Services staff. City staff shall accept the proposed concept prior to the HSRA moving the EIR forward.

3. The City does not support a future above grade crossing at Milling Street. Milling Street west of Sierra Highway is not designed to handle the Average Daily Traffic that would be placed there if this connection were made. Milling Street west of Sierra Highway is a residential street designed for low traffic volumes. Milling Street shall remain a residential street to preserve the quality of life the existing and future residents of this neighborhood currently have.

Acquisition of Right of Way

1. City staff identified several locations where the right of way acquisitions needed by the HSRA will create issues that need to be mitigated. Below is a list of comments by location:
 - a. Avenue H Impacts:
 - i. City Maintenance Yard Impacts: The HSRA shall re-establish all displaced parking along the frontage of the City Maintenance Yard, this also includes any impacted solar canopies. In addition, the recycling center shall be relocated. All work shall be done at the cost of the HSRA.
 - ii. All temporary impacts to the BYD parking lot shall be offset with temporary parking to accommodate the employee parking demand of BYD. All parking and shuttle services shall be subject to the approval of the City's Traffic Engineer and paid for by HSRA.
 - b. Avenue I Impacts:
 - i. HSRA is proposing a temporary easement over the entire site along the southside of Avenue I west of Sierra Hwy. This is the location of a proposed City affordable housing project and it will likely be constructed prior to the installation of the HSRA. HSRA shall coordinate with the City to minimize impacts to this site. HSRA shall pay for the cost of any redesign needed for this site. The City is rapidly advancing this project towards construction so this coordination shall occur ASAP.
 - ii. North of Avenue I on the eastside of Beech Avenue - The right of way acquisitions being proposed appear to render several properties unproductive. Specifically, APN's 3135-027-017 and 3135-005-026 are not acquired and appear to have no reasonable access points; meaning they appear unproductive. These parcels along with any other parcel similar to this in the City shall be included in the right of way acquisitions by the HSRA. Similarly, there are properties south of Avenue I along the westside of Trevor Avenue rendered unproductive. These shall be addressed.
 - c. Avenue K/Avenue L Impacts:
 - i. HSRA shall work with the City to complete/amend the Specific Plan for the area to the west of Sierra Highway. These parcels are being included in the development of a larger Specific Plan. All costs to update the City's Specific Plan shall be paid for by the HSRA.
 - d. From approximately Avenue L-8 south to Avenue O-4, there is a pocket of parcels that are not being taken by the HSRA. It would appear that this is the same location of the proposed Avenue M LMF Zone. These parcels shall be shown as the Avenue M LMF Zone on the Footprint Map book pages.

- e. Any and all properties that become rendered unproductive by the future right of way acquisitions shall be shown as being acquired by the HSRA. The Footprint Mapbook shall be amended accordingly and submitted to the City for review and acceptance prior to moving the EIR process forward.

Air Quality

1. There is no discussion under Local Agencies of the City of Lancaster, its general plan or its policies (pgs. 3.3-13 to 3.3-16). Only the cities of Bakersfield, Tehachapi and Palmdale were included. The EIR shall be amended to include a discussion for the City of Lancaster.
2. Table 3.3-17 has several receptors misclassified. St. Vincent is not a hospital and Penny Lane Centers should not be classified as a health care facility. AV Pulmonary Care should not be listed in the table. It is a medical equipment supplier, not a health care facility. The EIR shall be amended.
3. There does not appear to be a discussion regarding fugitive dust and its impacts on sensitive receptors, only a calculation of the amount of PM10 and PM2.5 that would be generated. There also is no discussion regarding valley fever. Given that the Antelope Valley has the highest incidents of asthma and other respiratory conditions in LA County, this really needs to be addressed. The EIR shall be amended to include these discussions along with appropriate mitigation measures.

Noise

1. Construction and operation of the HSR would not be able to meet the noise standards identified in the general plan or the noise ordinance as construction is also proposed to occur at night. The HSRA shall propose and present a study demonstrating that all construction and operation noise is mitigated to meet the standards in the City's general plan and noise ordinance.
2. The EIR used 80 dBA as the daytime threshold and 70 dBA as the nighttime threshold. These thresholds are substantially above the noise levels allowed in the City's general plan for any land use type. For construction and depending upon the type of work being performed, the 80-dBA contour would occur between 50 and 316 feet from the project boundary. For nighttime operations, the 70-dBA contour would occur between 158 and 998 feet from the project boundary. The EIR shall be updated to meet City of Lancaster standards.
3. All impacts to pile driving shall be mitigated. Provide updated mitigation measures and studies demonstrating this.
4. Operationally, the HSR would have moderate and severe noise impacts on a lot of sensitive receptors without mitigation between Bakersfield and Palmdale. It doesn't break it out for just within Lancaster. The EIR shall break out all impacts within the City of Lancaster and demonstrate acceptable mitigation of the noise. The HSRA shall obtain the City's concurrence of the mitigation measure prior to proceeding with the EIR process.
5. 7 schools within Lancaster would have a severe or moderate noise impacts from operations. Impacts to other sensitive receptors were not individually listed. The HSRA shall mitigate.

6. The only mitigation identified to address the noise impacts appears to be sound walls, which will not reduce the impacts to less than significant levels. These sound walls were described as needing to be at least 800 feet long and approximately 14 feet high but would be designed on a case by case basis. Provide adequate data demonstrating noise is mitigated to less than significant. In addition, all proposed sound walls shall be reviewed by the City prior to the acceptance. The review will include but not be limited to height, location, and aesthetics.

Hydrology

1. The HSRA shall evaluate and construct all required City of Lancaster Masterplan of Drainage Facilities required within the proposed Footprint of the HSR necessary to mitigate all future stormwater impacts. Please refer to the Masterplan proposed facilities on the attached Proposed Facilities Map attached to this letter. The HSRA shall amend the attached map as necessary to account for the realignment of Sierra Highway. The City requires the HSRA to address this comment prior to moving the EIR forward and provide a discussion in Section 3.8 on this analysis. In addition, the mitigation measures presented in Section 3.8 shall be amended to include any of the required Masterplan of Drainage Facilities.

Masterplan of Trails and Bikeways

1. Section 3.15 of the EIR references the City's adopted Masterplan of Trails and Bikeways but fails to adequately analyze the impacts to the existing and proposed trails identified in the masterplan. The EIR shall be amended to include an analysis of the impacts of the project on these trails and mitigation measures shall be presented.

All comments presented by the City shall be addressed to the satisfaction of the City prior to the HSRA moving the EIR forward. Should you have any comments or questions as it pertains to this letter, please feel free to contact Trolis Niebla at either (661) 945-6860 or tniebla@cityoflancasterca.org. The City looks forward to working with HSRA to address all of our comments.

Sincerely,



Jason Caudle
City Manager
City of Lancaster

TN/jew

cc: Jeff Hogan, Development Services Director
Trolis Niebla, City Engineer
Larissa De La Cruz, Planning Manager
Jocelyn Swain, Principal Planner
Matt Simons, Senior Traffic Engineer