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September 24, 2020

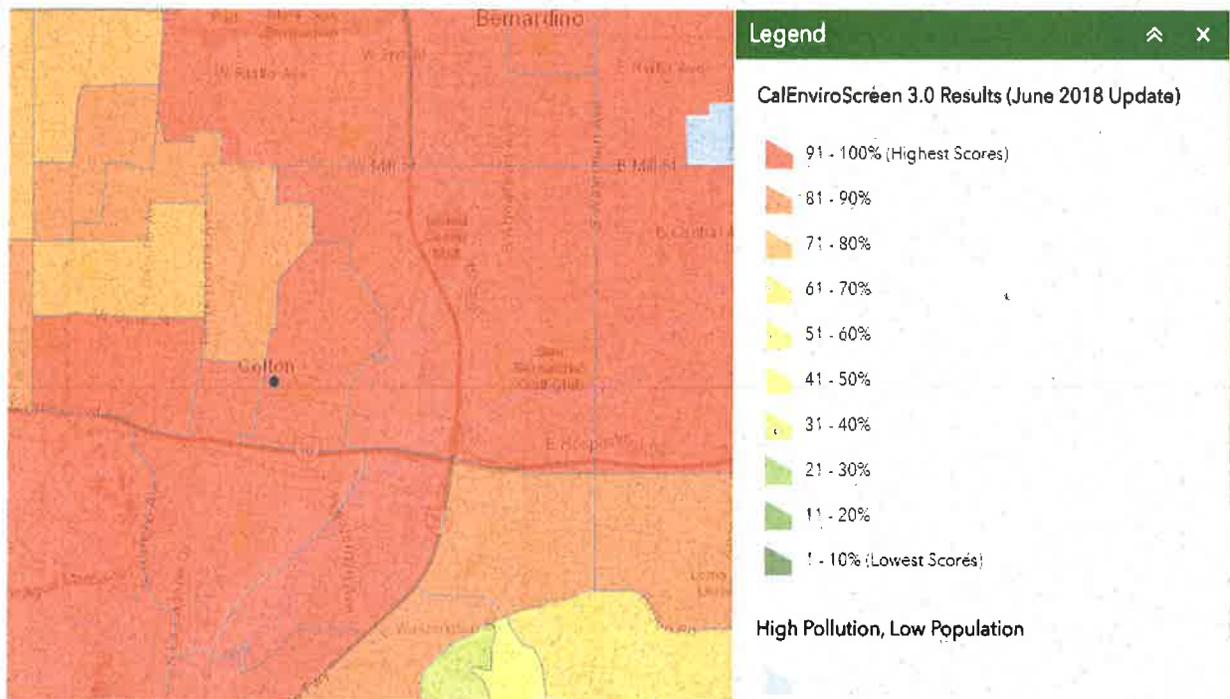
Mark A. McLoughlin, Director of Environmental Services
ATTN. Los Angeles – Anaheim, California High Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

SUBJECT: NOI/NOP for the California High Speed-Rail System, Los Angeles to
Anaheim Project Section – Colton Component

Dear Mr. McLoughlin:

Thank you for the opportunity to comment on the revised Notice of Intent to prepare an Environmental Impact Statement and Notice of Preparation to prepare an Environmental Impact Report for the California High-Speed Rail (HSR), Los Angeles to Anaheim Project Section; specifically the Colton Component. The City of Colton has many concerns and environmental issues that we request be addressed through the public outreach process, and in the EIR/EIS.

Our concerns and comments are provided in the context of Colton being a disadvantaged community that may be disproportionately impacted by this project. The majority of the census tracts in City of Colton, and all of the census tracts directly impacted by the project, have CalEnviroScreen 3.0 scores above the 90th percentile. Colton is most burdened by multiple sources of pollution and is vulnerable to the effects of 20 indicators of environmental quality and socioeconomic and public health conditions.



The City is also designated as a “Community of Concern” in Southern California Association of Governments (SCAG) planning documents. These are Census Designated Places (CDPs) that represent the top 33 percent of minority and low-income residents in the SCAG region. In other words, these are the most disadvantaged of the disadvantaged communities.

Public outreach conducted by California High-Speed Rail Authority (CHSRA) should be guided by the Transportation Action Plan Strategies prepared by the California State Transportation Agency (CalSTA) pursuant to Governor Newsom’s Executive Order (EO) N-19-19. Two strategies in particular are relevant to the Colton Component of the project:

“1. Reduce public health harms and maximize benefits to disproportionately impacted disadvantaged communities, low-income communities, and communities of color in urbanized and rural regions and involve these communities early in decision-making. Investments should also avoid placing new or exacerbating existing substantial burdens on communities, even if unintentional.

“7. Progress towards developing zero-emission freight transportation system that avoids and mitigates environmental justice impacts, reduces criteria and toxic air pollutants, improves freight’s economic competitiveness and efficiency, and integrates multi-modal design and planning into infrastructure development on freight corridors.”

Therefore, City of Colton residents should be involved early in decision-making regarding the Colton Component (i.e., intermodal facility, new rail connections and expansion of existing rail corridors through this city). While City of Colton staff and our City Council's Rail Subcommittee have had initial conversations with CHSRA, including review of preliminary ("PEPD") engineering plans, our involvement to date has been limited primarily to providing technical comments on plans, rather than having substantive conversations and conversations on solutions to issues of concern prior to release of the draft EIR/EIS. Likewise, our residents deserve to be consulted in a meaningful manner, and provided with as much technical information as available regarding preliminary rail alignments and specifications. The public workshops/scoping meetings conducted to date did not include the sharing of such information, leaving our residents unable to recommend solutions and alternatives that could be analyzed in the EIR/EIS.

The comments below address issues that we would expect the EIR/EIS to analyze and address and, as noted above, are focused on the Colton intermodal facilities and related rail improvements. Our comments are provided in six categories: Traffic (train and truck); Air Quality; Noise and Vibration; Hydrology/Water Quality; Visual Effects/Aesthetics; Land Use; and Energy.

Traffic (Train and Truck)

The City of Colton's Public Works/Engineering Division has provided the following comments which pertain to the requested traffic analysis in the EIR/EIS, appropriate mitigation measures, and related intermodal facility engineering and design issues.

1. Dedicate necessary RW for the ultimate width of the street along the intermodal facility frontage at Rancho Avenue (west side). Construct missing improvement such as sidewalk, Class 2 bike lane, sidewalk, curb and gutter along this street.
2. Dedicate necessary RW for the ultimate width of the street along the project frontage at Agua Mansa Road (north side). Construct missing improvement such as sidewalk, Class 2 bike lane, sidewalk, curb and gutter along this street.
3. Analyze the intersection of proposed Access Road at Rancho Avenue due to road curvature and proposed geometrics. Mitigation measures should include installation of a traffic signal due to number of trucks exiting and entering the intermodal facility.
4. In order to accommodate the projected increase in truck traffic, Slover Avenue, from the project entrance gate to Pepper Avenue, should be improved to include standard street section components (curb, gutter and sidewalk).

5. The projected increase in the anticipated truck traffic index will require mitigation to rehabilitate Pepper Avenue street pavement.
6. Analyze project impacts on segments of La Cadena Dr. and Rancho Ave., and all intersections along these corridors (between I-10 and I-215 Freeway). Construct mitigations identified by the analysis on these corridors and intersections.
7. Due to anticipated increase in train traffic, analyze the projected delay at BNSF track at-grade crossings at Valley Blvd. and at Olive St.
8. Reconstruction of the Fogg Street Underpass shall meet the vertical clearance requirement per applicable design standard.
9. As part of the proposed modifications to the BNSF rail corridor to Barton Road, the Barton Road Bridge (extending from S. La Cadena Drive over the BNSF tracks) should be realigned to better accommodate vehicular traffic.

Air Quality/Health

The addition of up to 10 freight trains per day and the associated increase in truck trips may offset any positive benefits of the HSR project. Residents who live or work near heavily-traveled roadways, railyards, bus yards, or trucking distribution centers can experience a high level of exposure to PM 2.5 (US EPA, 2002; Krivoshto et al., 2008). A study of US workers in the trucking industry found an increasing risk for lung cancer with increasing years on the job (Garshick et al., 2008). The same trend was seen among railroad workers, who showed a 40% increased risk of lung cancer (Garshik et al., 2004). Studies have found strong associations between diesel particulate exposure and exacerbation of asthma symptoms in asthmatic children who attend school in areas of heavy truck traffic (Patel et al. 2010, Spira-Cohen et al. 2011). Studies of both men and women demonstrate cardiovascular effects of diesel PM exposure, including coronary vasoconstriction and premature death from cardiovascular disease (Krivoshto et al., 2008). Another study of diesel exhaust inhalation by healthy non-smoking adults found an increase in blood pressure and other potential triggers of heart attack and stroke (Krishnan et al., 2013).

The City requests a Hot Spot Analysis, which can provide a weighted metric, based on rail operations that have high impacts on emissions. The Hot Spot Analysis should include a map of the local BNSF rail network hot spot locations, corresponding land use data, demographic data, rail tonnage and operations data. The additional air emissions should be calculated for the specific intermodal location using the methodology for location specific emissions and the weighted metric. The weighted metric should incorporate the number of trains, line haul operations, switching operations, and train speed. Total miles of track from BNSF currently in the

City of Colton should be provided as well displaying current emissions and the additional emissions with the ten added lines.

Mitigations would have to be extensive to assist in lowering any additional emissions when Colton is already at its highest score for environmental burdens. Governor Newsom's Executive Order 13045, states agencies must "ensure that its policies, programs, activities and standards address disproportionate [environmental health and safety] risk to children" (62 FR 19885). Woodrow Wilson elementary school is 1.1 mile from the project site and San Salvador Pre School is directly in the project boundary. This project is a risk to children's health.

Questions that should be addressed in the EIR/EIS include:

- What on-site equipment (truck, locomotive, and container lift equipment) will be provided to support intermodal facility activity and what will be the distribution of that equipment in terms of pollution output?
- What will be the distribution of locomotive tiers coming to and from the facility in terms of pollution output? What will be the dwell times of the locomotives, and what will be the idling limitations?
- What will be the distribution of truck sizes and powertrains coming to and going from the facility in terms of pollution output?
- What will be the schedule for required fleet transition to zero-emission technology – for all trucks permitted to serve the intermodal facility?

Noise and Vibration

1. The EIR/EIS should analyze and mitigate the increase in noise levels, both on the periphery of the intermodal facility as well as near train and truck routes to and from the facility.
2. Container lifts come with noise impacts, both night and day. What affects can be expected from this activity, particularly nighttime?
3. The overall increases in both daytime and nighttime noise levels associated with operations at the intermodal facility (both onsite and offsite) should be analyzed and mitigated in accordance with local noise standards. This should include truck traffic, onsite equipment and train traffic.

Visual Effects/Aesthetics

1. The City shall be involved in the approval of the aesthetics of the bridges, underpasses and any structures that are part of the project within the City of Colton.
2. The EIR/EIS should analyze and mitigate the visual impact of wall and elevated rail height (up to 35 feet above the existing grade at various locations) associated with the project, particularly adjacent to residential neighborhoods.
3. The City and BNSF shall enter into a Maintenance Agreement for maintenance of improvements related to the rail structure (bridge, retaining wall, etc.). Maintenance of these facilities shall be the responsibility of BNSF, including removal of graffiti.
4. What type of nighttime lighting will be used? How high will the lighting masts be, and what will be the light intensity? The EIR/EIS should explain this, including mitigation measures, in a way that any affected layperson can understand.

Hydrology/Water Quality

1. All water quality basins associated with the project outside of the Cal Portland site shall be within BNSF property and shall be maintained by BNSF.
2. Historically, storm water from the site flows to Agua Mansa Road. Provide analysis and mitigation on how this runoff will be addressed.

Land Use

1. The Land Use analysis should address consistency with goals and policies of the City of Colton's General Plan Land Use Element, specifically:
 - a. Residential Neighborhood Preservation and Protection Goal and Policies (Goal LU-6, Policies LU-6.1 to LU-6.7).
 - b. Industrial Districts Goal and Policies (Goal LU-11, Policies LU-11.1 to LU-11.5).
 - c. South Colton Community Focus Area Goals and Policies (Goal LU-18, Policies LU-18.1 to LU-18.6; and Goal LU-19, Policies LU-19.1 to LU-19.7).
2. The Land Use analysis should address how the project will further the guidelines and recommendations contained in the South Colton Livable Corridor Plan. Recommendations include Land Use and Zoning Policy Updates (some updates have been completed, others are in process), Recommended Improvements and Design Standards.

Both documents are available on the City of Colton's website.

Mark A. McLoughlin, Director of Environmental Services

September 24, 2020

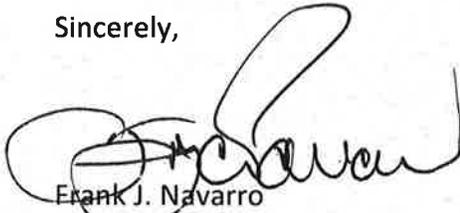
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Energy

As a new, "state of the art" facility that will co-exist with residential neighborhoods, the intermodal facility should be an example of energy sustainability. The EIR/EIS should address how the project will move towards energy sustainability, in both on-site operations and trains and trucks servicing the site.

We appreciate the opportunity to provide comments for inclusion in the design of the project components, for analysis in the EIR/EIS, and for mitigation of environmental impacts. The City of Colton looks forward to working collaboratively with CHSRA in the coming months on ways to forge more creative solutions that will shape the Colton intermodal facility to be a benefit to our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank J. Navarro". The signature is stylized with a large, looping initial "F" and "N".

Frank J. Navarro
Mayor

Cc: Colton City Council
Bill Smith, City Manager