



**AGENDA ITEM 2**  
**REPORT**

Southern California Association of Governments  
Remote Participation Only  
November 5, 2020

**To:** Transportation Committee (TC)  
Regional Council (RC)

**EXECUTIVE DIRECTOR'S  
APPROVAL**

**From:** Stephen Fox, Senior Regional Planner,  
(213) 236-1855, fox@scag.ca.gov

**Subject:** California High-Speed Rail Los Angeles to Anaheim Section

**RECOMMENDED ACTION:**

Receive and File.

**STRATEGIC PLAN:**

This item supports the following Strategic Plan Goal 1: Produce innovative solutions that improve the quality of life for Southern Californians.

**EXECUTIVE SUMMARY:**

*The California High-Speed Rail Authority (CHSRA) is currently constructing or in the environmental review process for the various project sections for Phase 1 of the California High-Speed Train (HST) from downtown San Francisco to Anaheim. CHSRA is preparing a draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Los Angeles to Anaheim project section scheduled for completion in June 2021, and recently issued a Revised Notice of Preparation/Notice of Intent (NOP/NOI) on August 25, 2020 to incorporate additional scoping for significant new freight rail and goods movement facilities that would be required in Colton and Barstow in order to construct and operate the HST. These projects were not included when the project was initially scoped in 2007. This report discusses these facilities and their potentially significant impacts within the SCAG region.*

**BACKGROUND:**

The California High-Speed Rail Authority (CHSRA) is currently constructing or in the environmental review process for the various project sections for Phase 1 of the HST from downtown San Francisco to Anaheim. Civil construction work is underway in the San Joaquin Valley along a 119-mile segment between the cities of Madera and Shafter north of Bakersfield which began in 2015. This construction work is divided between three design-build construction packages being performed by three contractor teams and needs to be completed by December 2022 per federal grant agreement requirements. Full environmental clearance of the entire Phase 1 section from San Francisco to Anaheim must also be completed by December 2022 under the federal requirements. The Phase 1 sections in the SCAG region are described below.

**OUR MISSION**

*To foster innovative regional solutions that improve the lives of Southern Californians through inclusive collaboration, visionary planning, regional advocacy, information sharing, and promoting best practices.*

**OUR VISION**

*Southern California's Catalyst for a Brighter Future*

**OUR CORE VALUES**

*Be Open | Lead by Example | Make an Impact | Be Courageous*

| 2020-21               |                      |                     |             |     |     |     |     |     |     |     |     |     |     |     | Total Mtgs<br>Attended<br>To Date |     |
|-----------------------|----------------------|---------------------|-------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----------------------------------|-----|
| MEMBERS               | CITY                 | Representing        | JUN<br>(GA) | JUL | AUG | SEP | OCT | NOV | DEC | JAN | FEB | MAR | APR | MAY |                                   | JUN |
| Ashton, Sean          | Downey               | District 25         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Bacerra, Phil         | Santa Ana            | District 16         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Baliley, Rusty        | Riverside            | WRCOG               |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Barger, Kathryn       | Los Angeles County   | Los Angeles County  |             |     |     |     |     |     |     |     |     |     |     |     |                                   |     |
| Beneit, Ben           | Wildomar             | South Coast AQMD    |             | 1   |     |     |     | 1   |     |     |     |     |     |     |                                   | 2   |
| Berg, Will            | Port Hueneme         | VCOG                |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Betts, Russell        | Desert Hot Springs   | CVAG                |             | 1   |     |     | 1   |     |     |     |     |     |     |     |                                   | 2   |
| Brown, Art            | Buena Park           | District 21         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Buscaino, Joe         | Los Angeles          | District 62         |             |     |     |     | 1   |     |     |     |     |     |     |     |                                   | 1   |
| Chun, Ross            | Aliso Viejo          | OCTA                |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Curtis, Jonathan      | La Cañada Flintridge | District 36         |             |     |     |     |     | 1   |     |     |     |     |     |     |                                   | 1   |
| Dixon, Diane          | Newport Beach        | OCCOG               |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Dutrey, J. John       | Montclair            | SBCTA               |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Gabel-Luddy, Emily    | Burbank              | AVCIPA              |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Gazeley, James        | Lomita               | District 39         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Grose, Dean           | Los Alamitos         | Dist 20             |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Hadjilian, Jack       | Montebello           | SGVCOG              |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Hagman, Curt          | San Bernardino Cnty  | San Bernardino Cnty |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Hamada, Ray           | Bellflower           | Bellflower          |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Harnik, Jan           | Palm Desert          | RCTC                |             | 1   |     |     |     | 1   |     |     |     |     |     |     |                                   | 3   |
| Hofbauer, Steven      | Palmdale             | District 43         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Judge, Mike           | Simi Valley          | VCCT                |             |     |     |     | 1   | 1   | 1   |     |     |     |     |     |                                   | 2   |
| Kelley, Trish         | Mission Viejo        | OCCOG               |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Krekorian, Paul       | Public Transit Rep   | District 49         |             |     |     |     |     |     |     |     |     |     |     |     |                                   |     |
| Krupa, Linda          | Hemet                | WRCOG               |             |     |     |     | 1   | 1   | 1   |     |     |     |     |     |                                   | 3   |
| Loa, Richard          | Palmdale             | NCTC                |             | 1   |     |     | 1   | 1   | 1   |     |     |     |     |     |                                   | 3   |
| Lorimore, Clint       | Eastvale             | District 4          |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Iv, Steven            | Rosemead             | District 32         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Manns, Steve          | Lake Elsinore        | District 63         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Marquez, Paul         | Caltrans District 7  | Ea-Oficio           |             | 1   |     |     |     | 1   |     |     |     |     |     |     |                                   | 2   |
| Marquez, Ray          | Chino Hills          | District 10         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| McCallion, Larry      | Highland             | SBCTA               |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| McLean, Marsha        | No. L.A. County      | District 67         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Michael, L. Dennis    | Rancho Cucamonga     | District 9          |             |     |     |     | 1   |     |     |     |     |     |     |     |                                   | 2   |
| Mhagar, Fred          | Laguna Niguel        | District 12         |             |     |     |     |     | 1   |     |     |     |     |     |     |                                   | 1   |
| Moore, Carol          | Laguna Woods         | OCCOG               |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Najarjan, Ara         | Glendale             | AVCIPA              |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Navarro, Frank        | Colton               | District 6          |             |     |     |     | 1   |     |     |     |     |     |     |     |                                   | 1   |
| Pacheco, Hector       | San Fernando         | District 17         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Puckett, Charles      | Tustin               | District 17         |             | 1   |     |     |     |     |     |     |     |     |     |     |                                   | 1   |
| Reece, Ed             | Claremont            | SGVCOG              |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Ruis, Crystal         | San Jacinto          | WRCOG               |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Saleh, Ali            | City of Bell         | GCCOG               |             |     |     |     |     |     |     |     |     |     |     |     |                                   | 2   |
| Sandoval, Tim         | Pomona               | District 38         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Santos, Ray           | Beaumont             | District 3          |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Schwank, Zak          | Terrace              | District 5          |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Simonoff, Marty       | Ira                  | District 22         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 2   |
| Small, Thomas         | Culver City          | Culver City         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Smith, Jeremy         | Canyon Lake          | Canyon Lake         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Smith, Larry          | Calimesa             | Calimesa            |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Smith, Ward           | Placentia            | OCCOG               |             | 1   |     |     | 1   |     |     |     |     |     |     |     |                                   | 2   |
| Solache, Jose Luis    | Lynwood              | District 26         |             |     |     |     |     | 1   |     |     |     |     |     |     |                                   | 1   |
| Spiegel, Karen        | Riverside County     | Riverside County    |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Sternquist, Cynthia   | Temple City          | SGVCOG              |             |     |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 2   |
| Talamantes, Jess      | Burbank              | AVCIPA              |             |     |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 2   |
| Tercero, Brent        | Pico Rivera          | GCCOG               |             |     |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 2   |
| Tye, Steve            | Diamond Bar          | District 37         |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Viegas-Walker, Cheryl | El Centro            | District 1          |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Wagner, Don           | Orange County        | Orange County       |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Wallace, Colleen      | Banning              | Banning             |             |     |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 2   |
| Wagner, Alan          | Ontario              | SBCTA               |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |
| Weintraub, Alicia     | Calabasas            | LVMCOG              |             | 1   |     |     | 1   | 1   |     |     |     |     |     |     |                                   | 3   |

Attachment: TC Attendance Sheet (Minutes of TC Meeting, October 1, 2020)

#### Bakersfield to Palmdale

This segment will run from Bakersfield to Palmdale via the “Bakersfield Gap” generally along the Union Pacific freight single track through the Tehachapi Mountains. Currently, the planned Palmdale HST station is located about 900 feet south of the existing Palmdale Transportation Center that serves Metrolink and Antelope Valley Transit Authority. The Draft EIR/EIS document was released in February 2020 and the public review period ended in April 2020.

#### Palmdale to Hollywood Burbank Airport

This section will run from Palmdale to Hollywood Burbank Airport. This segment is 38 miles long and the state-preferred alternative adopted in 2018 roughly follows SR 14, and is completely underground within the Santa Clarita City limits. The Draft EIR/EIS document is expected to be released in May 2021.

#### Hollywood Burbank Airport to Los Angeles

This section will run from Hollywood Burbank Airport to L.A. Union Station. The state preferred alternative is approximately 14 miles long and will operate on the existing Los Angeles-San Diego-San Luis Obispo (LOSSAN) Corridor. The Draft EIR/EIS was released in May 2020 and the public review period ended in August 2020.

#### Los Angeles to Anaheim

This section will run from L.A. Union Station to the Anaheim Regional Transportation Intermodal Center (ARTIC). The state-preferred alternative is approximately 30 miles in length and will operate on the existing LOSSAN Corridor. The Draft EIR/EIS document is expected to be released in June 2021.

On August 25, 2020, CHSRA issued a Revised NOI under the National Environmental Policy Act (NEPA) and a Revised NOP under the California Environmental Quality Act (CEQA) for the EIR/EIS for the Los Angeles to Anaheim Project Section. The purpose was to initiate additional scoping to solicit input on new freight rail and goods movement facilities that would be required in Colton and Barstow in order to build and operate the HST. These facilities were not identified and included when the project was initially scoped in 2007. These freight rail and goods movement facilities are large in scale with potentially significant environmental impacts within the SCAG region, notably in San Bernardino County.

#### New Facilities

CHSRA is proposing to build additional high-speed electrified tracks in order to operate the HST along the LOSSAN Corridor between Los Angeles Union Station and Anaheim. This corridor would be shared with existing and future passenger and freight rail services (e.g., Amtrack, Metrolink and Burlington Northern Santa Fe Railroad [BNSF]). In order to meet future freight and passenger

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service levels, coupled with the operation of the HST, CHSRA is proposing to evaluate new freight rail and intermodal facilities outside of the LOSSAN Corridor located in San Bernardino County. These facilities include a completely new intermodal yard in the City of Colton and new railroad staging tracks in the City of Barstow.

Barstow Facility: The Barstow facility, referred to as the Lenwood facility, would be required as a new freight train staging facility outside and east of the LOSSAN Corridor, which is owned by BNSF between downtown Los Angeles and Fullerton and is one of its major main lines in the SCAG region, to allow freight trains to be staged or held outside and east of the LOSSAN Corridor in the High Desert to permit adequate service windows for normal operation and maintenance in the corridor. It would consist of the following main elements: staging tracks, staging track leads, circulation and roadway modifications, and utility modifications. The Lenwood project site would generally be located along the six existing BNSF main line tracks and south and west of State Route 58 within the city of Barstow and unincorporated San Bernardino County.

Colton Facility: The Colton facility would be required to accommodate future freight train volumes (an average of 10 freight trains per day) that could not be accommodated in the LOSSAN Corridor due to future volumes of HST and other passenger and freight trains. It would be an entirely new intermodal rail yard and consist of the following main elements: intermodal rail yard, railroad lead tracks, circulation and roadway modifications, and utility modifications. The Colton project is in the southwest part of San Bernardino County, mostly within an unincorporated area while the remainder is primarily in the cities of Colton and Grand Terrace. It is generally south of Interstate 10 and the Union Pacific Railroad rail lines and north of the Santa Ana River and west of Colton Crossing.

Environmental Effects: The proposed new rail facilities could potentially have significant environmental effects in the Inland Empire, including on air quality, noise, traffic congestion, visual impacts, and environmental justice.

#### **Communication to CHSRA**

SCAG has sent two joint letters to CHSRA from the executive directors of the San Bernardino County Transportation Authority, SCAG and the South Coast Air Quality Management District in June and September of this year. These letters asked for more and better collaboration and communication between CHSRA, SCAG and its affected partner agencies for the Los Angeles to Anaheim segment and these new facilities; and also expressed concern on the potential air quality impacts from the new intermodal yard, the need to incorporate project specific mitigation measures and the potential challenges associated with various air quality conformity determinations, as this realignment of goods movement in the SCAG region was not modeled in SCAG's 2020 Connect SoCal Regional Transportation Plan and Sustainable Communities Strategy.



Other SCAG partner agencies, including the Riverside County Transportation Commission and Southern California Regional Rail Authority, have also submitted comment letters to CHSRA in response to the revised NOP/NOI scoping period. Major themes of these letters include the need for better early coordination by CHSRA and the need for a rigorous and thorough environmental analysis concerning the potential negative effects of the two facilities.

**NEXT STEPS:**

SCAG staff will continue to work with rail partner agencies in coordinating and reviewing the analysis performed on these new rail and intermodal facilities through the CHSRA environmental process and provide regular updates to TC and RC.

**FISCAL IMPACT:**

Staff work related to this project is included in the FY 2020-21 Overall Work Program (OWP) under Project 140.0121.02 (Regional High-Speed Transport).

**ATTACHMENT(S):**

1. SCAG, SBCTA and SCAQMD Joint Letter to CHSRA - June 4, 2020
2. SCAG, SBCTA and SCAQMD Joint Letter to CHSRA - September 3, 2020



June 4, 2020

Mr. Brian Kelly  
Chief Executive Officer  
California High Speed Rail Authority  
925 L Street, Ste. 1425  
Sacramento, CA 95814



Dear Brian:

It is our understanding that the CHSRA is getting ready to release a CEQA/NEPA document for the Los Angeles-Anaheim segment, and that this proposed project includes plans to move freight rail capacity out of Hobart Railyard to Colton.

While we understand the need to plan for the best alignment for the high speed rail system, and recognize that this might mean realignment of existing rail infrastructure, such planning should also consider local and regional implications. First, this plan concept for freight capacity realignment is not included in our Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The realignment would also likely result in local truck traffic and air quality impacts in conformity budgets and air quality attainment plans given both locations are in the same air district.

While the HSR project as a whole is expected to provide greenhouse gas benefits to the State, the proposed freight has the potential to impact San Bernardino County inordinately, and these environmental impacts must be disclosed, analyzed, and mitigated to the extent feasible.

This letter is to ask for more collaboration on CHSRA's plans for this segment. We want to work with you to find a way forward to minimize the likely impacts listed. We will certainly make further comments on the CEQA/NEPA document and we hope our teams could work together in the development of the EIR/EIS for the segment.

Thank you for the consideration.

Sincerely,

KOME AJISE  
Executive Director

Southern California  
Association of Governments

WAYNE NASTRI  
Executive Officer

South Coast Air Quality  
Management District

RAY WOLFE  
Executive Director

San Bernardino County  
Transportation Authority

c: David Kim, Secretary, California State Transportation Agency



September 3, 2020



Mr. Brian Kelly ([Brian.Kelly@hsr.ca.gov](mailto:Brian.Kelly@hsr.ca.gov))  
Chief Executive Officer  
California High Speed Rail Authority  
925 L Street, Ste. 1425  
Sacramento, CA 95814



Dear Brian,

Thank you for your July 24, 2020 response to our letter requesting additional collaboration between CHSRA and South Coast AQMD, SCAG, and SBCTA regarding the Los Angeles-Anaheim segment of the high speed rail project. We appreciate your commitment to work with us, and note that staff have had several productive briefings on the LA-Anaheim project segment. We believe continued early and open dialogue on a project of this magnitude will be important as you move forward, especially given the magnitude of the potential air quality impacts in San Bernardino County and the aggressive schedule your team is working towards.

In that spirit, we wanted to share with you some of our early concerns based on the information we have been provided thus far. The four primary issues are 1) the potential air quality impacts from the new freight railyard in Colton, 2) the need to incorporate project specific mitigation measures, 3) the potential challenges associated with various conformity determinations, and 4) the need to establish an information sharing process between the agencies and interested stakeholders. Each of these issues are discussed in more detail in the attachment to this letter.

We recognize that the environmental documentation should present all these details, and we look forward to participating in that formal review process. However, it is our experience that early consultation and sharing of more detailed technical information enhances and streamlines the overall review process and timeline, particularly for projects with



tight schedules. We reiterate our request to engage up front on CHSRA's plans for the Los Angeles-Anaheim segment.

Thank you for your consideration.



Sincerely,



KOME AJISE  
Executive Director

Southern California  
Association of  
Governments

WAYNE NASTRI  
Executive Officer

South Coast Air  
Quality Management  
District

RAY WOLFE  
Executive Director

San Bernardino County  
Transportation  
Authority

### Air Quality Impacts

It is our understanding that one component of the LA-Anaheim project is a new BNSF intermodal freight rail yard located at the former Cal Portland Cement Company plant in unincorporated San Bernardino County near the city of Colton. The community living immediately adjacent to this site is already classified by the state Office of Environmental Health Hazard Assessment as being in the worst 95<sup>th</sup> percentile in the state using the CalEnviroScreen 3.0 tool. These already environmentally burdened nearby census tracts also include populations with much higher proportions of Hispanic and/or Black residents than the South Coast AQMD as a whole (see table below).

| Area             | Hispanic | Black | White | CalEnviroScreen 3.0 Score |
|------------------|----------|-------|-------|---------------------------|
| Tract 6071004004 | 71%      | 3%    | 21%   | 95-100%                   |
| Tract 6071007108 | 46%      | 26%   | 18%   | 95-100%                   |
| Tract 6071012500 | 88%      | 3%    | 7%    | 95-100%                   |
| Tract 6071006601 | 83%      | 2%    | 13%   | 95-100%                   |
| Tract 6071003612 | 68%      | 12%   | 12%   | 80-85%                    |
| South Coast AQMD | 47%      | 7%    | 30%   | N/A                       |

Freight rail yards have many sources of emissions that impact the air regionally and locally. These include onsite equipment (e.g., cargo handling equipment and switcher locomotives) and other mobile sources that travel to and from the site (e.g., on-road trucks and long haul locomotives). Based on the limited information we received during the briefing, it is our understanding that onsite cargo handling equipment will be zero emissions. However even if all onsite equipment is zero emissions, an intermodal facility like this will attract a significant number of on-road trucks and generate new locomotive activity as trains are built every day. The emissions from these activities will dwarf those saved from using zero emission cargo handling equipment. It is our

understanding that there are currently no project components that will address the local impacts from on-road trucks or locomotives.<sup>1</sup>

Further, the project team expressed that they anticipate that this project has the potential to reduce regional emissions, mainly due to lower truck traffic going to rail yards near downtown LA and going to this new rail yard instead. This is projected to occur because some BNSF trackage would be used for high speed rail, and the new rail yard would be designed to make up for this reduction in throughput from the Hobart yard. While this may be a potential outcome in the long term, the timing of project implementation should be addressed. As expressed to us during the briefing, the new freight rail yard would open as early as 2026, however the high speed rail project would not operate potentially until 2040. This project therefore would appear to increase the total capacity of BNSF's system in the short term, and the resulting regional emissions from this scenario are unclear. Given the significant challenges our region faces meeting federal air quality standards in milestone years of 2023, 2031, and 2037, better understanding these shorter term impacts are of paramount importance.

Finally, from what we know today, a new railyard would likely have significant air quality impacts, locally and potentially regionally. Our understanding is that the only reason that this freight rail yard is being included as a component of the HSR project is that it would mitigate for lost trackage for BNSF. We would like to understand more about whether the freight railyard component of the project could move forward absent construction of HSR. We appreciate that these two projects are being considered collectively in the environmental analysis, however if the rail yard can move forward independently from HSR, then the air quality impacts for that component of the project should be presented separately and mitigated accordingly.

### **Need for Project Mitigation**

If our limited understanding of this project is correct, there are potentially significant air quality issues that must be addressed. We appreciate that the project team has initiated discussions with our staff about providing funding for mitigation. However, any mitigation that the project team is hoping that South Coast AQMD can accomplish on its

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<sup>1</sup> While zero emissions cargo handling equipment is welcome, note that recent emissions inventory information from 2017 provided by the railroads to South Coast AQMD indicates that the vast majority of onsite emissions are not from cargo handling equipment at southern California rail yards. Offsite emissions would also not be addressed by onsite cargo handling equipment mitigation.

behalf should only be considered after all feasible measures have been considered as part of the project itself.<sup>2</sup> South Coast AQMD should only be looked to as an implementer of another project's mitigation as a last resort after all feasible steps have been taken within the project itself. Before any further consideration of making South Coast AQMD responsible for mitigating HSR's air quality impacts, we recommend that time be dedicated to identifying what can be done within the project itself to reduce/avoid air quality impacts.

### **Conformity**

It is not fully clear at this stage, but it would appear that this project may need a conformity determination on three fronts. First, it is our understanding that the project must be included in a conforming regional transportation plan from SCAG. Second, the project may need to meet project-level transportation conformity requirements. Finally, the project must show that it meets general conformity tests. Each of these determinations require significant technical analysis. South Coast AQMD staff traditionally works with SCAG and EPA in a secondary role on the two transportation conformity tests, and we look forward to our involvement in those processes for this project. South Coast AQMD staff takes a lead role in regards to general conformity. The timing is beneficial for the project's general conformity analysis given that we are just now beginning our 2022 Air Quality Management Plan effort. However, given the significant challenges our region faces in meeting national ambient air quality standards on time, it is not clear what portion, if any, of the region's emissions budget can be dedicated to general conformity in the upcoming plan. We do not anticipate that the relatively simple first-come first-served set aside process from previous AQMPs will be sufficient for the 2022 AQMP. Given that there are three HSR sections in South Coast AQMD (i.e., Palmdale-Burbank, Burbank-LA, LA-Anaheim), we recommend working on general conformity for all three projects collectively, especially as emissions impacts may overlap in time.

### **Need for Additional Details and Engagement**

Each of the issues identified above will require substantial technical analysis and modeling. As that work is undertaken, we encourage HSR to communicate early with our staff to work through any methodological details as they arise. While this can

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<sup>2</sup> For example, if there are air quality impacts from locomotives and trucks, then the project should identify mitigation to lessen impacts from those sources.



initially take time, in our experience this additional upfront work can facilitate and streamline the review process.

In addition to the technical modeling analysis for this project, we would appreciate getting a better understanding of the whole of the HSR program in our region. For example, it appears that the Burbank-LA portion of the project will require relocation of a portion of Metrolink's maintenance activities to somewhere in the Inland Empire. Along with the relocation of freight activities to the Inland Empire from the LA-Anaheim project, we would appreciate hearing if there are other project components that will result in impacts from any of the HSR project sections that aren't associated directly with the construction of the high speed rail line itself.

Finally, during the July 1 briefing, my staff strongly encouraged the HSR project team to reach out specifically to local and environmental community groups to discuss this project. At the request of the project team, we provided you with a list of contacts for key organizations. Since that time, we have had initial conversations with many of these groups, and they have raised significant questions about air quality and environmental justice issues associated with this project. We are unable to answer these questions as we know that you all are still actively working on analyzing impacts. However, given the limited information about this project, and the significant concerns being raised, we would again encourage you to reach out to these groups. These groups provide unique perspectives about their own communities and valuable information to better inform projects as you consider the best way to move forward

