



March 8, 2021

California High-Speed Rail Authority
Attn: Draft 2020 Business Plan
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

Subject: San Bernardino County Transportation Authority (SBCTA) comments on the Revised Draft of the 2020 High Speed Rail Business Plan

Dear Board Members of the California High Speed Rail Authority:

This letter provides San Bernardino County Transportation Authority's (SBCTA) response to the Revised Draft of the 2020 High Speed Rail Business Plan issued by the California High Speed Rail Authority (CHSRA) on February 9, 2021. SBCTA serves as the County Transportation Commission for San Bernardino County, the largest county geographically in the continental United States with a population of over 2.1 million. Our members consist of the county's 24 cities plus the County of San Bernardino.

SBCTA's April 9, 2020 letter to Chief Executive Officer Brian Kelly, written in response to the First Draft 2020 High-Speed Rail Business Plan, voiced several concerns about a new Colton Intermodal Facility and Lenwood Staging Tracks as highlighted on page 94 of the first draft of the Business Plan under the "BNSF Partnership" heading. The Colton and Lenwood facilities were said to be needed so that CHSRA could fit two high speed rail tracks into the rail corridor currently owned and operated by BNSF running between Los Angeles and Anaheim. This would be facilitated by BNSF moving a significant portion of its intermodal operations to a new facility in the City of Colton. BNSF freight trains currently proceeding into Los Angeles would then terminate in Colton, where the truck-rail and rail-truck container lifts would occur.

Subsequent to that letter, the CHSRA began scheduling periodic briefings with SBCTA staff to provide additional details about the projects, particularly the Colton Intermodal Facility. Then in a letter dated September 24, 2020, SBCTA commented on the August 8, 2020 issuance of a Revised Notice of Preparation (NOP) of a Project Level Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Los Angeles (Union Station) to Anaheim (Anaheim Regional Transportation Intermodal Center [ARTIC]) Project Section of the California High-Speed Rail (HSR) System. This letter further documented our concerns about the Colton and Lenwood facilities and requested additional information.

While the meetings with CHSRA and BNSF have been appreciated, the staff representatives have indicated that most of the requested information will not be available until the draft EIR/EIS is publicly released. The Colton facility is projected to be a very major freight intermodal operation,

even larger than the San Bernardino Intermodal Facility, which is located immediately north of SBCTA offices. The opportunity to review the extensive analysis of traffic, air quality, noise, visual effects, and other community impacts will now be compressed into a maximum 60-day period, giving the distinct impression that the CHSRA is not living up to the level of transparency and collaboration that the State of California expects of other transportation agencies, like SBCTA. We expressed some of these concerns in our September 24th letter on the NOP. If the BNSF Colton facility had been its own separate project, and not an adjunct to the HSR Los Angeles to Anaheim segment, it would have received much more attention than it has received.

When the Revised Draft 2020 High Speed Rail Business Plan was released on February 9, 2021, we were extremely disappointed to find that the discussion about the CHSRA/BNSF partnership and the Colton and Lenwood facilities had been completely eliminated from the Business Plan. This gives an even further impression that the Authority is not being transparent with the communities it will most impact when implementing the Los Angeles to Anaheim segment of the HSR system. And as we have indicated in prior correspondence, these are some of the most disadvantaged communities in the State of California, based on CalEnviroScreen data.

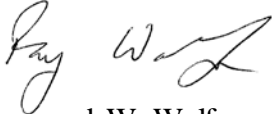
The concerns of SBCTA and our member agencies have been well documented in our prior letters to the CHSRA, and there is no need to repeat those here. Both letters are attached for reference and can be considered as part of our comments on this component of the HSR Business Plan. However, we would like to point out that the California Air Resources Board (CARB) issued a more recent letter to CHSRA dated December 21, 2020 stating its own concerns about the air quality impacts from the Colton project. An excerpt from Page 2 of the CARB letter is provided below:

“The Project, as proposed, has the potential to increase freight train and truck traffic along existing rail lines and roadways as a result of the proposed intermodal rail facility. If so, this increase in traffic will expose nearby disadvantaged communities to further elevated levels of air pollution. Addressing the disproportionate impacts that air pollution has on disadvantaged communities is a pressing concern across the State, as evidenced by statutory requirements compelling California’s public agencies to target these communities for clean air investment, pollution mitigation, and environmental regulation.”

The CARB letter goes on to describe ways to mitigate these impacts, should the facility be implemented. Our concerns about air quality are similar to those of CARB. However, ours also go considerably beyond CARB’s air quality comments, covering a range of community impacts related to traffic, noise, and visual effects. We will deal with those in the course of the environmental process. But our specific request regarding the Business Plan would be that the language included in first draft of the Business Plan be re-inserted in the final Business Plan. The Plan needs to acknowledge the significance of the CHSRA plans to place the Colton and Lenwood facilities, with their potential adverse impacts, as a part of implementing the HSR system. The exclusion of this language also gives an appearance of inequity in the Business Plan, in that the benefits of HSR to the coastal counties are highlighted in the Plan, while the inland impacts of the major freight facilities, which are now part of the EIR/EIS project description, appear to be swept under the carpet.

While SBCTA is committed to continued collaboration with CHSRA and our agency partners in Southern California, it would be disingenuous of us not to also point out the major concerns we have about the likely impacts to the communities we represent. Both SBCTA and the San Bernardino Council of Governments (SBCOG) have the same 29-member Board, and together we are highlighting our concerns and the continued need for open dialogue on how to avoid, minimize, and mitigate the impacts of this project, should it move forward.

Sincerely,



Raymond W. Wolfe
Executive Director

April 9, 2020

Mr. Brian Kelly
Chief Executive Officer
California High Speed Rail Authority
770 L Street, Suite 620,
Sacramento, CA 95814

Subject: SBCTA Comments on the Draft 2020 High Speed Rail Business Plan

Dear Mr. Kelly,

The San Bernardino County Transportation Authority (SBCTA) appreciates the opportunity to comment on the California High Speed Rail Authority's (CHSRSA's) *Draft 2020 High Speed Rail Business Plan*. The Business Plan represents a significant update and provides a better indication of how the State High Speed Rail system will serve Southern California and integrate with our urban rail systems.

Our interest in the Business Plan pertains primarily to the section on page 94 regarding the BNSF Partnership. See excerpt from the Business Plan below:

(from page 94) BNSF PARTNERSHIP

The Los Angeles to Anaheim project section is an extremely constrained existing three-track rail corridor, with roads, overpasses, businesses and homes abutting nearly every mile of the rail right of way. The corridor also is heavily used by existing diesel passenger and freight rail, which interoperate on the three tracks. Preliminary plans to add electrified high-speed rail tracks in this corridor involved adding two new dedicated electric tracks roughly parallel to the existing tracks, which would require a meaningful widening of the existing right-of-way into existing roads, buildings and homes.

Through a partnership with BNSF Railway (BNSF), CalSTA and regional rail providers, a concept was developed to accomplish largely the same capacity results with a four-track configuration (two freight and two electrified passenger) that will fit mostly inside the existing right of way, thereby reducing impacts in the main corridor. Offsetting the capacity lost by reducing freight to two tracks will require new facilities to be constructed in the Inland Empire. These facilities include the Lenwood Staging Tracks near Barstow and the Colton Intermodal Facility.

Given that SBCTA is a governing member of the Southern California Regional Rail Authority (SCRRA), we have a great interest in seeing the overall passenger rail system succeed in serving San Bernardino County residents, businesses, and all Southern California. However, the specifics

Page 2
Mr. Brian Kelly
April 9, 2020


of the proposal are unclear regarding how Metrolink service might be impacted or improved in the process of accommodating High Speed Rail within the Los Angeles to Anaheim segment.

Beyond that, we have questions about the magnitude of the proposed BNSF intermodal facility in Colton, the amount of traffic it would generate (particularly truck traffic), where that traffic would access the freeway system, and what both the traffic and air quality impacts would be. While we expect the EIR/EIS to disclose those impacts, as the designated transportation planning agency for San Bernardino County, we would like to get an early look at those plans and be able to suggest mitigations to the impacts.

The schedule for completion of the draft EIR/EIS is shown in the Business Plan as January 2021, and yet there is essentially no information currently available about the intermodal facility's design or planned circulation system. We would request that CHSRA contact us to provide additional information at your earliest convenience. Please also help us understand how the environmental documentation is structured, how the environmental clearance of the intermodal facility fits within that structure, and what the stakeholder outreach process will involve through the environmental process.

We also note in the Business Plan the multiple references to the Virgin Trains project between San Bernardino County and Las Vegas, a private sector venture being assisted by the State in their quest to obtain tax-exempt private activity bonds. We look forward to further information and coordination on that front as well. Again, thank you for the opportunity to comment, and we look forward to additional contacts with the CHSRA in the near future.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Wolfe". The signature is fluid and cursive, with the first name "Ray" and the last name "Wolfe" clearly distinguishable.

Raymond W. Wolfe
Executive Director

September 24, 2020

Mark A. McLoughlin
Director of Environmental Services
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

Subject: SBCTA Comments on Revised Notice of Preparation (NOP) of a Project Level Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Los Angeles (Union Station) to Anaheim (Anaheim Regional Transportation Intermodal Center [ARTIC]) Project Section of the California High-Speed Rail (HSR) System, primarily along the Los Angeles - San Diego – San Luis Obispo (LOSSAN) Rail Corridor, as well as freight accommodation project components in Colton and Lenwood to allow future cumulative passenger and freight traffic volumes.

Dear Mr. McLoughlin,

The San Bernardino County Transportation Authority (SBCTA) appreciates the opportunity to comment on the revised NOP issued by the California High-Speed Rail Authority (CHSRA) for the above project. SBCTA serves as the County Transportation Commission for San Bernardino County, the largest county geographically in the continental U.S., with a population of over 2.1 million. Our members consist of the county’s 24 cities plus the County of San Bernardino.

As you know, SBCTA’s April 9, 2020 letter to Brian Kelly, written in response to the draft 2020 High-Speed Rail Business Plan, voiced several concerns about the Colton and Lenwood facilities as highlighted on page 94 of the draft Plan under the “BNSF Partnership” heading. Having received no response from CHSRA, an agenda item was then included in the May 6, 2020 SBCTA Board agenda to adopt a resolution opposing a proposed BNSF intermodal facility in Colton and the proposed Lenwood Staging Tracks near Barstow, “absent meaningful SBCTA involvement in the environmental process and adequate CHSRA mitigation for the impacts brought about by the proposed BNSF facilities.” CHSRA then reached out to us several days prior to the Board meeting to voice interest in scheduling informational workshops for SBCTA on the project, and the agenda item was pulled from the Board agenda in anticipation of improved coordination.

While the three followup meetings so far have enabled us to better understand the scope and scale of the projects, we believe the CHSRA is not being entirely consistent with the State’s own policies on collaboration and early involvement in the crafting of constructive solutions, for reasons explained later in this letter.

MAM200924-ss

Our comments on the NOP focus on areas we would want to make sure the EIR/EIS covers, particularly with respect to the Colton and Lenwood facilities, and goes into additional detail about the need for avoidance, minimization, and mitigation of impacts. However, we would like to begin by saying that SBCTA and its member agencies have an appreciation for the logistics industry and the benefits it brings to the Inland Empire. Many of our residents are employed in that industry: those who work in our warehouse/distribution facilities, those who drive trucks locally as well as for interstate commerce, and those who work for the two Class 1 railroads that have been such a part of San Bernardino County's history. All of these individuals have been widely acknowledged as workers that were essential to keep on the job during the COVID-19 pandemic, and heroes in their own right.

The very offices in which SBCTA employees work – the Santa Fe Depot – carry two of the same initials as your BNSF partner on this project, and we have collaborated on many projects with BNSF before, such as: 1) the Colton Crossing project, providing a grade separation of the BNSF and Union Pacific lines just north of the proposed project (in fact, the actual rails of the crossing, originally built in 1883, are now embedded in the driveway in front of the Depot), and 2) the upcoming replacement of the Mount Vernon Avenue bridge over BNSF's intermodal facility in San Bernardino. We know the BNSF facility well, being able to look out over its operations from our north-facing windows on a daily basis. The lives of Colton and San Bernardino residents have been intertwined with the railroads for some 140 years.

Through our recent discussions with the CHSRA staff and consultants, we have begun to better understand the project and why the CHSRA and BNSF partnership was necessary. But our knowledge of the BNSF's proposed operations is accompanied by an awareness of the potential impacts, such as those on traffic, air quality, noise, and visual effects. It is our hope that by being forthright with our questions and concerns we can arrive at solutions that are in the interest of all parties, including the disproportionately impacted disadvantaged communities and local jurisdictions we represent.

To do this, there will need to be more interaction between CHSRA, BNSF, and San Bernardino County entities than you originally anticipated. Our understanding is that material in the underlying studies will not be available for outside review until the release of the draft EIR/EIS in Spring 2021. This is going to inhibit attempts to craft win-win solutions and may build walls that significantly prolong the project's approval.

The CHSRA's approach, while it may be traditional, is not in the spirit of the draft Transportation Action Plan Strategies recently prepared by the California State Transportation Agency (CalSTA) pursuant to Governor Newsom's Executive Order N-19-19. The EO requires *“that every aspect of state government redouble its efforts to reduce greenhouse gas emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy.”* The CalSTA document includes 10 draft investment strategies, two of which are particularly relevant to the Colton and Lenwood portions 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 a 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.***"

With respect to the first strategy, the cities of Colton, Grand Terrace, and San Bernardino, plus the nearby unincorporated Bloomington area and City of Rialto, all have a majority of census tracts with CalEnviroScreen scores above the 80th percentile, and all but Grand Terrace have been designated as "Communities of Concern" (COC) in 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. You can see this visually in the two attached graphics at the end of this letter, derived from CalEnviroScreen 3.0, illustrating how much of the area is in the 90-100 percent category of disadvantaged communities in the State, by census tract. The first graphic is the overall rating; the second focuses just on the pollution burden, which represents a composite index of various pollutants. These visuals show how dramatically both the existing San Bernardino facility and the proposed Colton facility are surrounded by communities that are heavily disadvantaged already, relative to the rest of the State.

The point is that these communities, in particular, should be involved early in decision-making. And while SBCTA and the communities have had initial conversations with CHSRA, failing to have substantive conversations and collaboration on solutions prior to the release of the draft EIR/EIS could hardly be classified as "involvement in early decision-making," nor is it seen as a collaborative approach by the communities your project is poised to impact. By taking the approach you have, the CHSRA and BNSF are missing an opportunity to craft a more collaborative solution that could be beneficial to all parties. The Los Angeles to Anaheim High-Speed Rail segment is a good example of a type of unintended consequence referred to in CalSTA Strategy 1 above. It gives the impression that the Administration that introduced the "Regions Rise Together" initiative is using that as lip service and is not interested in actually tackling the hard problems at the community level, particularly for inland counties like San Bernardino and Riverside.

Further, it should be noted that the CHSRA selected a preferred alternative for the LA to Anaheim segment almost two years ago, absent the knowledge that the Colton and Lenwood facilities would be needed. The November 15, 2018 CHSRA staff report to the CHSRA Board stated that "Staff based this recommendation on the conceptual engineering, environmental analysis, and numerous public, stakeholder and agency meetings conducted to date." Therefore, the selection of the preferred alternative was made without full knowledge of the scope of the environmental impacts on the Inland Empire. Public outreach up to that point was limited to jurisdictions in the LA to Anaheim corridor, and there was no outreach to Inland Empire jurisdictions up to that time.

Given that the November 15 staff report states: "Identification of the State's Preferred Alternative is neither an approval nor a final decision, and the Authority may change the preferred

alternative based on comments received during public and agency review of the Draft EIR/EIS,” it is important for the public and Board to know that the preferred alternative is subject to revision based on the additional information being brought into focus now that the Colton and Lenwood facilities are included. We would urge the CHSRA Board to consider, in the interest of promoting a fair and impartial evaluation, that the decision on the preferred alternative be withdrawn until a full analysis and disclosure is available through the Draft EIR/EIS, which will have the Colton and Lenwood component analysis included. It is entirely possible that the CHSRA Board may have come to a different conclusion on the LA to Anaheim segment after consideration of the full scope of the project, and had Inland Empire stakeholders been able to provide comments on the preferred alternative from their perspective.

The bullet points below are posed as questions or issues that we would expect the EIR/EIS to address, or factors that the various analyses should consider. Most of the comments are on the proposed Colton BNSF Intermodal Facility, organized into four categories: traffic (train and truck); air quality; noise, vibration, and visual impacts; and community outreach. Several additional comments are offered on the Lenwood Staging Tracks.

COLTON BNSF INTERMODAL FACILITY

1. Traffic (train and truck) and the regional supply chain
 - a. Fundamentally, it is difficult to understand how the addition of the Colton Intermodal Facility will alter the regional supply chain and its connections to the national supply chain. We believe that CHSRA owes the community information that will enable us to better understand this, so that we can put the impacts in context. How does this impact the competitiveness of the logistics sector in a way that benefits the Inland Empire? If the proposed facility is expected to bring more benefits to San Bernardino County, it is imperative that we understand how this will occur. If there are only negative impacts and no benefits, you can understand why local communities and transportation agencies like SBCTA would be opposed. We urge the CHSRA to be more transparent about this aspect of the proposal. Otherwise, we have no choice but to assume the worst.
 - b. It is understood from the NOP that BNSF expects there to be an average of 10 trains per day. Please provide a profile of how those train volumes are likely to vary by day of week and season of year. Please provide estimates of containers per train and the directional movement of those trains into and out of the Colton intermodal facility.
 - c. What is the expected growth profile for trains into and out of the facility? What is an expected opening day number of trains versus a horizon year number of trains?
 - d. How will the train volumes and container lifts at the Colton facility affect train volumes and container lifts at the San Bernardino yard? What is the growth profile for the San Bernardino yard with and without the Colton yard?
 - e. What are the current volumes and travel patterns of trucks that service BNSF trains, and how will the project change them?
 - f. How will the project change truck trip volumes and travel patterns at the San Bernardino intermodal yard?

- g. What will the impact of these trucks be on I-10, I-215, and SR-60, as well as the interchanges (I-10/Pepper Avenue, I-10/Rancho Avenue, I-10/Riverside Avenue, I-10/Mount Vernon Avenue, I-215/La Cadena Drive, SR-60/Rubidoux Boulevard) and arterial routes that provide access into and out of the facility, to include: Pepper Avenue, Rancho Avenue, La Cadena Drive, Agua Mansa Road, Rubidoux Boulevard, and Riverside Avenue, among others?
- h. What mitigations are proposed for these impacts? This is one of the most important topics for which “involvement in early decision-making” is needed.
- i. Please note that only minimal growth within the area to be occupied by the proposed BNSF site was assumed for recent modeling for the SCAG Regional Transportation Plan and for SBCTA and local project development activities. No major new developments were assumed in the project area when the I-10/Pepper interchange was designed and construction completed just three years ago.
- j. While traffic Level of Service (LOS) is no longer considered an impact under CEQA, Caltrans recently issued (July 2020) a document entitled: “Interim Land Development and Intergovernmental Review (LDIGR) Safety Review Practitioners Guidance.” This document serves as an interim guide for conducting safety reviews for projects that impact State facilities. We believe two types of impacts will particularly need to be evaluated in the case of the Colton facility, as quoted from the document:
 - “Queuing at off-ramps resulting in slow or stopped traffic on the mainline or speed differentials between adjacent lanes.
 - Queuing exceeding turn pocket length that impedes through-traffic.”

These reviews will need to occur at all the interchanges listed previously, at a minimum. The impact of trucks on queue length will be particularly adverse at the I-10/Pepper Avenue and I-10/Rancho Avenue interchanges. The July 1, 2020 Caltrans Memorandum transmitting the Interim Safety Guidelines can be viewed at:

<https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/policy/interim-ldigr-safety-guidance-memo.pdf>.

The attachment to the memo is available from Caltrans.

2. Air Quality

- a. 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 emissions output?
- b. What will be the distribution of locomotive tiers coming to and from the facility in terms of emissions output (i.e. what tier locomotives)? What will be the dwell times of the locomotives, and what will be the idling limitations?
- c. What will be the distribution of truck sizes and powertrains coming to and going from the facility in terms of emissions output?
- d. How will the emissions output collectively impact nearby residential areas, schools, parks, and other sensitive receptors, based on the levels of train and truck traffic forecast?

- e. What mitigations are proposed for these impacts? What thought has been given to how the operation of this facility can be used to encourage fleet turnover to zero-emission and near-zero emission technology within the logistics industry overall?
 - f. How will pollution levels be monitored within the Colton community both during construction and on an ongoing basis following construction?
3. Noise, vibration, and visual effects
- a. How much will noise levels increase, both on the periphery of the intermodal facility as well as on train and truck routes to and from the facility?
 - b. Container lifts come with noise impacts as well, both night and day. We know this very well from being an adjacent neighbor to BNSF's San Bernardino facility. What impacts can be expected from this activity, particularly nighttime?
 - c. What will be the overall increases in daytime noise levels versus nighttime? Will the Colton facility have 24-hour operation? We are assuming that it will.
 - d. What measures will be taken to mitigate noise levels and to what extent will those levels be mitigated both during the day and at night?
 - e. What type of nighttime lighting will be used? How high will the lighting masts be, and what will be the light intensity? How will night lighting spillover effects be contained to the site? Please explain in a way that affected communities can understand.
 - f. As we understand it, the entry point to the facility from the BNSF mainline will require structures that turn westerly toward the intermodal facility, and the retaining walls for the structures and their approaches could extend up to 35 feet higher than existing grade, with houses nearby.
4. Community outreach
- a. When we first read the draft High-Speed Rail Business Plan earlier this year, we noticed on page 94 that the relationship of CHSRA and BNSF is characterized as a partnership. We would request that this concept of partnership be extended to Inland Empire agencies and to those local communities that will be impacted. Clearly, the way in which this project began could not at this time be characterized as a partnership with any of the communities in the Inland Empire. In fact, the project gives the impression that, once again, the benefits will accrue to the coastal counties and the impacts will be borne by the inland counties, their residents, and disproportionately impacted disadvantaged communities. It makes the "Regions Rise Together" initiative, announced by the Governor over a year ago, appear as mere talking points to placate our concerns, and reinforces the point that the administration is not serious about solving the challenges of disadvantaged and low-income communities in the inland counties.
 - b. Although there is great concern over the project itself, and its impacts, how the project was introduced and is being managed by CHSRA is an even greater concern. We had to find out about this project through Metrolink, with no other evidence of its existence until the draft 2020 High-Speed Rail Business Plan was published – no heads up, no courtesy calls, but rather we happened across the first written evidence of it buried on page 94 of the Business Plan. And the more we find out, the more significant the project has turned out to be.
 - c. We believe the outreach process is still salvageable, and we would like to see how we can navigate through this for some win-win opportunities, skeptical though we

may be at this point. Several areas of mitigation have been mentioned previously. But since this is a new facility, there is an opportunity to make this an example of a facility that exemplifies sustainability. It could also be an opportunity to incentivize the logistics industry in general to leverage its success into paying more attention to zero and near-zero emission technology, mitigation of community impacts and sensitivity to the environment in which it operates.

- d. We recognize that this type of partnership approach may have some limitations in terms of feasibility and cost. Being an implementing agency, SBCTA recognizes that solutions must be practical and affordable. But had CHSRA come to us with this intent in mind, it would have become easier to work together on constructive solutions. That said, we would propose that the transportation and air quality agencies and local government representatives be able to interact with CHSRA collectively in the coming months on ways to forge more creative solutions that will help the Colton intermodal facility better fit into the community that surrounds it. Keeping these agencies at arms' length, with NOPs, NOIs, and comment letters going back and forth is not going to create the more constructive environment that will help this project succeed. It means playing by the State's own rules, such as the investment strategies cited earlier. If the State is willing, then we can have more serious conversations about how to properly establish this process and renew more of a sense of trust in that process.

LENWOOD STAGING TRACKS

1. Drainage and Street improvements - Please identify additional street improvements or grade separations, as well as drainage improvements, which will be required to implement the staging tracks.
2. Train staging activity – please provide an estimate of the amount and time of staging activity, and train operations while the staging is in process (e.g. amount of time that trains are expected to spend idling)
3. Please identify the potential air quality, noise, and vibration impacts of the staging activity on the local area. Noise impacts should be differentiated by daytime and nighttime.
4. It is understood that there would be no intermodal activity at this location, but please identify any additional traffic/truck activity anticipated and the distribution of those additional vehicles.
5. Clarify if any additional lighting will be provided or what other visual impacts could occur.

We appreciate the opportunity to provide comments and look forward to further discussions with CHSRA and BNSF, in partnership with our local communities.

Sincerely,



Raymond W. Wolfe
Executive Director

cc: San Bernardino County Delegation

